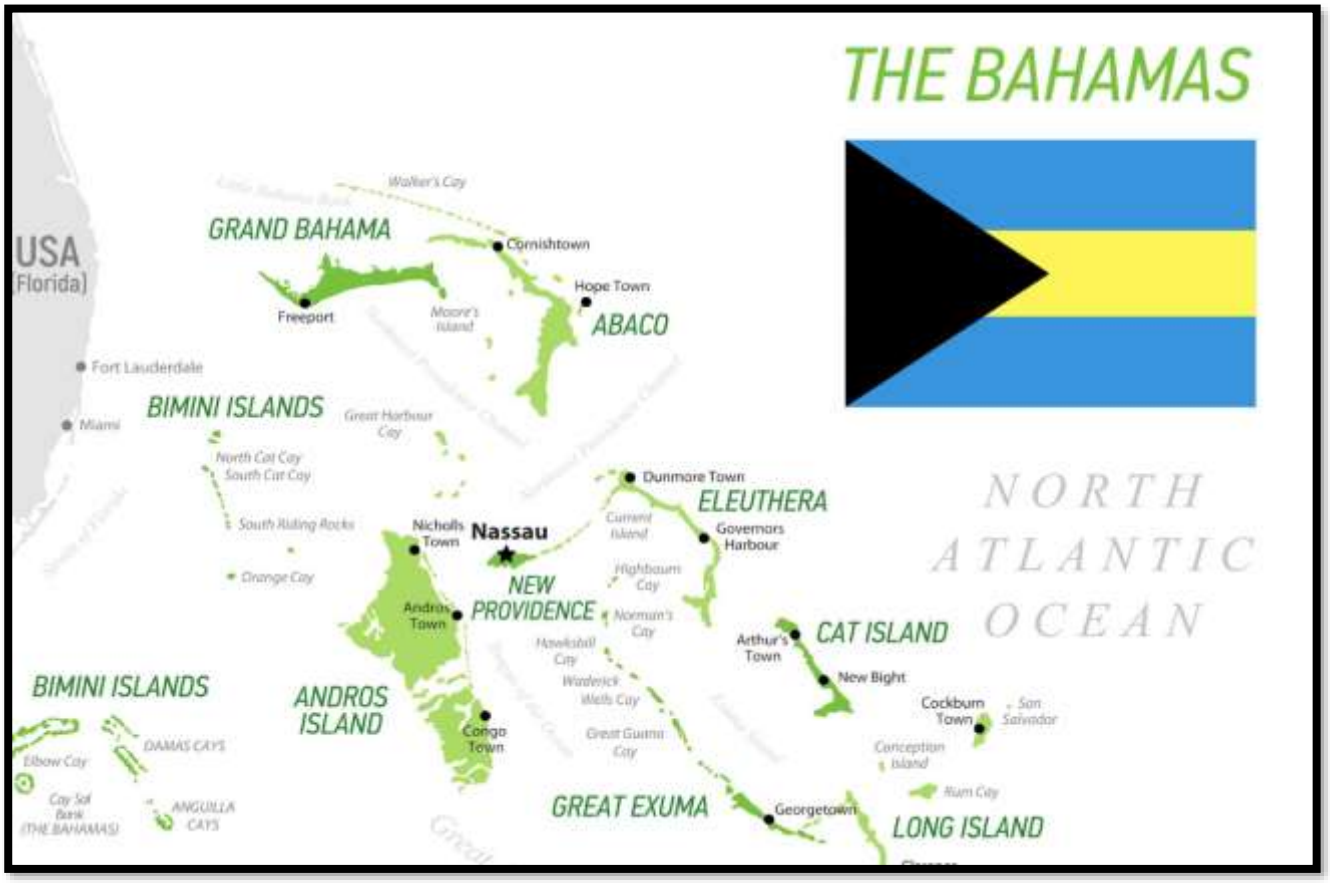


Environmental and Social Management System (ESMS)

Sustainable Housing for Urban Transformation (BH-L1064)

4climate resilience

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LIST OF ACRONYMS AND ABBREVIATIONS

Abbreviation	Definition
CESMP	Contractor Environmental and Social Management Plan
DEPP	Department of Environmental Planning and Protection
EA	Executing Agency
E&S	Environmental and Social
EHS	Environmental, Health and Safety
EPPA	Environmental Planning and Protection Act
ESA	Environmental and Social Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESPF	IDB Environmental and Social Policy Framework
ESPS	Environmental and Social Performance Standard
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
IDB	Inter-American Development Bank
LMP	Labor Management Procedures
MOHLR	Ministry of Housing and Land Reform
OHS	Occupational Health and Safety
PIU	Program Implementation Unit
PPP	Public-Private Partnership
RAP	Resettlement Action Plan
SEA	Sexual Exploitation and Abuse
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan

Abbreviation	Definition
SH	Sexual Harassment
ToR	Terms of Reference

1 EXECUTIVE SUMMARY

This Environmental and Social Management System (ESMS) has been prepared for the Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064) (the Program), to be financed by the Inter-American Development Bank (IDB), in compliance with Environmental and Social Performance Standard 1 (ESPS 1) of the IDB's Environmental and Social Policy Framework (ESPF). ESPS 1 requires Borrowers to establish and maintain an ESMS that is proportionate to the nature, scale, and level of environmental and social risk associated with the operation.

The Program will be implemented over a six-year period with a total budget of US$50 million. The Ministry of Housing and Land Reform (MOHLR), as the Executing Agency, will deliver the Program through a dedicated Project Implementation Unit (PIU). Implementation is structured around four components: (1) New Housing; (2) Sustainable Urban Investments – Improvement of the Existing Housing Stock; (3) Institutional Strengthening and Regulatory Reform; and (4) Project Administration, Management, and Audit.

A representative sample of projects, accounting for a minimum of 30% of Program costs, has been assessed in parallel with the preparation of this ESMS. The remaining, non-sample investments identified during Program execution will be screened and managed through the Program's Environmental and Social Management Framework (ESMF), which operationalizes this ESMS at the level of new individual projects.

The ESMS is organized around the seven elements required under ESPS 1. The procedures and processes supporting each element are set forth in the Program's ESMF and the associated environmental and social instruments.

Key features of the system, as required by the seven elements of the IDB ESMS established under this ESMS, include:

- Mandatory environmental and social screening and risk classification of every project prior to financing, using the Environmental and Social Screening Form (ESMF, Chapter 5, Annex A);
- Dedicated environmental, social, resettlement, and occupational health and safety specialist profiles within the PIU, with minimum qualifications and responsibilities set out in Annexes A.1–A.4 of this ESMS;
- A Grievance Redress Mechanism (GRM), available at no cost to project-affected people and other stakeholders throughout the Program lifecycle;
- A layered reporting structure, comprising monthly environmental and social compliance reports from contractors to the PIU, and semi-annual compliance reports from the PIU to the IDB; and
- A continual improvement process pursuant to which this ESMS is reviewed and updated in response to changes in Program scope, audit findings, newly identified risks, and IDB requirements.

MOHLR, as the Executing Agency, holds institutional responsibility for the implementation of this ESMS and for ensuring compliance throughout the Program's execution with the environmental and social legal and regulatory framework of The Bahamas and the IDB's ESPF.

2 INTRODUCTION

This document presents the ESMS for the Program to be implemented by the MOHLR with financing from the IDB.

The Program seeks to increase access to adequate, affordable, resilient, and sustainable housing for low- and middle-income households in The Bahamas. To achieve this objective, the Program will finance investments that increase the supply of housing, improve the resilience and quality of the existing housing stock, strengthen institutional capacity, and modernize the policy and regulatory framework for housing and urban development.

The Program is organized around four components:

1. New Housing, including the development, rehabilitation, and construction of housing on serviced land;
2. Sustainable Urban Investments, focused on improving the resilience and quality of the existing housing stock and public housing estates;
3. Institutional Strengthening and Regulatory Reform, including policy development, planning studies, and institutional capacity building; and
4. Project Administration, Management, and Audit, supporting Program implementation, monitoring, evaluation, and financial management.

As the Program Executing Agency, MOHLR is responsible for ensuring compliance with the environmental and social requirements applicable to Program activities. Day-to-day implementation will be carried out by the PIU, which will coordinate project preparation and implementation, oversee environmental and social management, monitor compliance, and report Program performance to the IDB.

The Program will be implemented over a six-year period, at a total estimated cost of US$50 million. During Program preparation, representative sample projects accounting for at least 30 percent of the total Program value were assessed through project-specific Environmental and Social Assessments (ESAs). The remaining investments will be managed through project-specific Environmental and Social Management Plans (ESMPs), developed in accordance with the process established in the ESMF. The ESMF which forms part of the ESMS, establishes the procedures for environmental and social screening, risk classification, assessment, management, monitoring, and reporting for all future projects financed under the Program.

This ESMS has been prepared in accordance with the requirements of ESPS 1: Assessment and Management of Environmental and Social Risks and Impacts, of the IDB's ESPF. ESPS 1 requires Borrowers to establish and maintain an Environmental and Social Management System that is proportionate to the nature, scale, and significance of the environmental and social risks and impacts associated with the Program.

The ESMS and the ESMF are complementary instruments. The ESMS establishes the institutional framework, governance arrangements, roles and responsibilities, and management processes for environmental and social risk management at the Program level. The ESMF operationalizes the ESMS by providing the procedures, methodologies, templates, and guidance required to implement environmental and social management at the project level, including screening, environmental and social assessment, stakeholder engagement, management plans, monitoring, and reporting.

The ESMS is structured around the seven elements established under ESPS 1:

- Program Environmental and Social Framework;
- Identification of Environmental and Social Risks and Impacts;

- Management Programs;
- Organizational Capacity and Competence;
- Emergency Preparedness and Response;
- Stakeholder Engagement; and
- Monitoring, Reporting, and Evaluation.

Together, these elements provide a systematic framework to ensure that environmental and social risks and impacts are effectively identified, managed, monitored, and continually improved throughout the implementation of the Program.

The Program's ESMF forms an integral part of the ESMS and is provided as Appendix A to this document. The ESMF establishes the technical framework, procedures, screening and eligibility criteria, trigger mechanisms, and project-level environmental and social instruments required to identify, assess, and manage environmental and social risks and impacts under the Program. The ESMS establishes the institutional and management arrangements through which these requirements will be implemented, monitored, reported, and continually improved. The ESMS and ESMF shall therefore be read and applied together throughout Program implementation, with the ESMF serving as the primary technical reference for project-level environmental and social due diligence.

3 ELEMENTS OF THE ESMS

The IDB requires borrowers to have a Program level ESMS commensurate with the level of risk and impacts associated with the operation, in accordance with the seven required elements of ESPS 1 (Figure 3.1), without specifying a predetermined format.

Figure 3.1 Elements of the environmental management system



Source: IDB, 2021

The ESMS draws on the principles of the established management process of "Plan-Do-Check-Act" to provide a methodological approach for the ongoing, structured, and systematic management of environmental and social risks and impacts.

As described in the figure above, the ESMS is comprised of seven elements, which are described in the table below.

Table 3.1 ESMS elements

Elements of the ESMS		Description
I	Program environmental and social framework (ESMF)	Establishes the environmental and social objectives and principles that guide the Program to achieve good environmental and social performance; indicates the national and local regulatory framework, as well as international standards and requirements.
II	Identification of Risks and Impacts	Presents the identification of environmental and social risks and impacts associated with the project and establishes environmental and social assessment.
III	Management Programs	Establishes guidelines for the preparation of ESMPs, contemplating different environmental Management Programs with the corresponding mitigation measures to address the environmental and social risks and impacts that have been identified in the sample.
IV	Organizational capacity and competence	Establishes the roles and functions for the implementation of the Program.
V	Emergency Preparedness and Response	Establishes the Environmental and Social Management Plans to be implemented in the event of an emergency based on the identification of environmental and social risks and impacts.
VI	Stakeholder Engagement	Defines the processes of interaction with the parties (consultation processes, grievance mechanisms)
VII	Monitoring and Evaluation	Establishes the procedure for monitoring and evaluating progress in the implementation of the Program and its management programs.

Source: IDB, 2021

The following sections describe each of the elements of the ESMS and the corresponding procedures, instruments, and management tools that will be implemented throughout the Program lifecycle.

3.1 ELEMENT 1: PROGRAM ENVIRONMENTAL AND SOCIAL FRAMEWORK (ESMF)

This Section sets out the environmental and social objectives that will guide the implementation of the Program and support the achievement of compliant environmental and social performance across financed projects. The ESMF establishes the environmental and social assessment and management processes to be followed during Program implementation and identifies the applicable institutional and legal framework aligned with the provisions of the IDB's ESPS.

3.1.1 MOHLR Environmental Policy

While the MOHLR does not have a standalone environmental and social policy, the Program adopts the principles and requirements of the IDB ESPF as the foundation for environmental and social management. Through the ESMS, MOHLR commits to integrating environmental and social considerations into all phases of the Program and ensuring that environmental and social risks and impacts are identified, assessed, managed, monitored, and reported throughout the financed project's cycle.

The PIU will include qualified environmental and social specialists responsible for implementing the ESMS and ensuring compliance with national legislation, the IDB's ESPF, and applicable international good industry practice (GIIP).The following subsections describe the principles and objectives that provide the foundation for this approach, translating the requirements of the IDB ESPF into the context of the Program and guiding the identification, assessment, management, monitoring, and reporting of environmental and social risks and impacts throughout the project cycle. The objectives further define the intended outcomes of the ESMS and provide the basis for evaluating the effectiveness of its implementation.

3.1.1.1. Environmental and Social Principles

The **following principles** will guide the implementation of the Program:

- Integrate environmental and social considerations into decision-making throughout the project life cycle, including planning, design, procurement, construction, operation, maintenance, and closure, as applicable.
- Apply the mitigation hierarchy by avoiding, minimizing, mitigating, and, where residual impacts remain, compensating for adverse environmental and social impacts.
- Ensure compliance with the laws and regulations of The Bahamas, the requirements of the IDB ESPF, and applicable international good industry practice.
- Promote sustainable, climate-resilient, and disaster-resilient housing development that protects natural resources and strengthens community resilience.
- Maintain transparent, timely, and inclusive communication with stakeholders through effective stakeholder engagement and accessible grievance mechanisms.
- Protect the health, safety, security, and well-being of workers, nearby communities, and the public.
- Promote equality, inclusion, non-discrimination, accessibility, and respect for human rights, including the prevention of gender-based violence, sexual exploitation and abuse, and sexual harassment (GBV/SEA/SH).
- Foster continual improvement in environmental and social performance through monitoring, evaluation, and adaptive management.

3.1.1.2. Objectives

The ESMF establishes the objectives of the Program's ESMS:

- Integrate environmental and social risk management into all Program activities and decision-making processes.
- Ensure that Program activities are environmentally and socially sustainable and consistent with the requirements of the IDB's ESPF.

- Identify, assess, and manage environmental and social risks and impacts through proportionate assessment and implementation of appropriate mitigation measures.
- Apply meaningful stakeholder engagement and information disclosure throughout the Program lifecycle.
- Establish and operate an effective GRM that is accessible, transparent, and responsive.
- Strengthen institutional capacity within MOHLR to implement environmental and social risk management consistently across all Program projects.
- Promote continual improvement through monitoring, reporting, periodic review, and corrective actions where necessary.

3.1.1.3. Regulatory Framework

All financed projects are required to comply with the applicable legal and regulatory framework of the Commonwealth of The Bahamas, including environmental, planning, occupational health and safety, labor, cultural heritage, and other relevant legislation.

The legal, regulatory, policy and institutional framework applicable to the Program is described in Chapter 4 of the ESMF.

The ESMF establishes the procedures for screening, assessment, management, monitoring, and reporting of environmental and social risks and serves as the primary reference for preparing project-specific environmental and social instruments in accordance with applicable national legislation, the IDB's ESPF, and relevant international good industry practice.

3.1.1.4. Institutional Capacity and Competencies

The organizational structure, roles, responsibilities, staffing requirements, and competency requirements for implementation are described under ESMS Element 4: Organizational Capacity and Competence.

3.1.1.5. Environmental and Social Assessment and Management Processes

The environmental and social assessment and management process is established in the ESMF, which includes:

- Environmental and Social Eligibility and Exclusion Criteria
- Environmental and Social Screening and Risk Classification
- Environmental and Social Assessment requirements
- Preparation of project-specific environmental and social instruments
- Environmental and Social Management Plans and monitoring requirements
- Roles and responsibilities of MOHLR, contractors, supervision consultants, and other relevant entities
- Environmental and social management throughout the project cycle.

3.1.1.6. Emergency Preparedness and Response

This Program's Emergency Preparedness and Response Procedures are described under ESMS Element 5: Emergency Preparedness and Response.

3.1.1.7. Stakeholder Engagement and Grievance Redress Mechanism

The Stakeholder engagement, information disclosure, consultation requirements, and the GRM are described under ESMS Element 6: Stakeholder Engagement and the Program Stakeholder Engagement Framework (SEF).

3.1.1.8. Monitoring, Reporting and Evaluation

Procedures for monitoring environmental and social performance, reporting, compliance verification, corrective actions, and continual improvement are set out in ESMS Element 7: Monitoring, Reporting, and Evaluation.

3.1.1.9. Communication and Dissemination of the ESMS

To ensure effective implementation, the ESMS shall be communicated and made accessible to all relevant MOHLR personnel, the PIU, supervision consultants, contractors, and other entities responsible for Program implementation.

MOHLR will coordinate communication and dissemination of the ESMS through appropriate communication channels, including induction sessions, training workshops, electronic distribution, internal meetings, and other communication platforms.

The objective of these activities is to ensure that all personnel understand their environmental and social responsibilities, consistently apply the procedures established in the ESMS, and contribute to continual improvement in the Program's environmental and social performance.

3.2 ELEMENT 2: IDENTIFICATION OF RISKS AND IMPACTS

The MOHLR, through the PIU, shall ensure that all Program financed projects undergo an environmental and social risk identification and assessment process prior to approval and throughout implementation, as required by the IDB's ESPF.

The detailed procedures, methodologies, screening tools, risk classification process, environmental and social instruments, and management requirements are established in the Program's ESMF. The ESMS establishes the institutional responsibilities for ensuring that these procedures are consistently applied.

The PIU shall ensure that:

- all proposed projects are screened against the Program's Environmental and Social Eligibility and Exclusion Criteria;
- environmental and social risks and impacts are identified and assessed using the procedures established in the ESMF; including Disaster and Climate Change Risk Assessments for new projects;
- the appropriate environmental and social instruments are prepared in accordance with the project's risk classification;
- all applicable environmental permits and regulatory approvals are obtained prior to implementation;
- environmental and social requirements are incorporated into procurement documents and construction contracts; and
- environmental and social mitigation measures are implemented, monitored, and reported throughout the project lifecycle.

The following subsections describe the Bahamian environmental licensing requirements and IDB Environmental and Social Requirements that all new projects will need to comply with.

3.2.1 Environmental Licensing

All projects financed under the Program are required to comply with the environmental permitting requirements established under the laws and regulations of the Commonwealth of The Bahamas.

Although the MOHLR has statutory authority under the Housing Act (Chapter 199) and the Urban Renewal Authority Act, 2024, projects remain subject, as applicable to the environmental authorization requirements established under the Environmental Planning and Protection Act, 2019 (EPPA) and the Environmental Impact Assessment Regulations, 2020.

The Department of Environmental Planning and Protection (DEPP) is responsible for determining the environmental authorization requirements applicable to each project. The procedures and regulatory requirements for environmental permitting are described in Chapter 4 of the ESMF.

3.2.2 Compliance with IDB's Environmental and Social Requirements

The Program is required to be implemented in accordance with the applicable Environmental and Social Performance Standards (ESPS) of the IDB's ESPF, national legislation, and international good industry practice, as appropriate.

The ESMF provides the procedures for identifying the applicable ESPS, assessing environmental and social risks and impacts, determining the required environmental and social instruments, and establishing mitigation, monitoring, and reporting measures.

The environmental and social risks identified through the representative sample Environmental and Social Assessments (ESAs) undertaken during Program preparation informed the development of the environmental and social management procedures, mitigation measures, and guidance contained in the ESMF. These procedures must be applied, as appropriate, to all projects financed under the Program.

3.3 ELEMENT 3: MANAGEMENT PROGRAMS

Through the PIU, MOHLR will ensure that appropriate environmental and social management programs are developed and implemented for all projects financed under the Program. These management programs are designed to be proportionate to the nature and significance of the environmental and social risks and impacts identified during the environmental and social assessment process and to be consistent with the mitigation hierarchy.

The ESMF establishes the requirements, templates, and guidance for the preparation and implementation of project-specific ESMPs and other environmental and social management instruments required under the Program.

The PIU will ensure that:

- Project-specific management measures, including the Project's Disaster and Climate Change Risk Management Plan (DRMP), are incorporated into the applicable environmental and social instruments;
- Environmental and social obligations are included in the technical specifications, bidding documents, and construction contracts;
- Contractors prepare and implement Construction Environmental and Social Management Plans (CESMPs), where required, prior to the commencement of works;
- Sufficient financial, human, and technical resources are allocated for the implementation of environmental and social management measures; and

- Environmental and social management programs are monitored throughout project implementation and updated, as necessary, to address changes in project conditions, unforeseen impacts, or lessons learned.

The minimum content and requirements for ESMPs and CESMPs are provided in the ESMF. Project-specific environmental and social management programs will be implemented by the responsible parties identified in this ESMS. The institutional roles and responsibilities for implementation, supervision, monitoring, and reporting are described in ESMS Element 4: Organizational Capacity and Competence.

3.4 ELEMENT 4: ORGANIZATIONAL CAPACITY AND COMPETENCIES

As Executing Agency for the Program, the MOHLR is responsible for ensuring effective implementation of the ESMS.

The PIU is responsible for coordinating environmental and social management throughout the Program and ensuring compliance with the requirements of the IDB ESPF, applicable national legislation, and the ESMF.

The detailed roles and responsibilities of the entities involved in environmental and social management throughout the project cycle are described in the ESMF. Table 3.2 summarizes the institutional responsibilities established under the ESMS.

The following subsections describe the organizational structure, roles and responsibilities, contractor capacity, and training and institutional strengthening requirements necessary to support effective implementation of the ESMS.

3.4.1 Organizational Structure

The PIU has been established within MOHLR to manage Program implementation and coordination of all activities financed under Loan BH-L1064.

To effectively implement the ESMS, the PIU must maintain adequate environmental and social capacity throughout the Program, ensuring, at a minimum, that qualified personnel are available to provide:

- Environmental risk management;
- Social risk management, including stakeholder engagement and grievance management;
- Occupational health and safety oversight; and
- Environmental and social monitoring and reporting.

The final organizational structure and staffing arrangements shall be submitted to the IDB for No Objection prior to Program implementation and are required to be maintained throughout Program execution.

The recommended minimum qualifications and responsibilities for key environmental and social personnel are provided in Annexes A.1–A.4 of this ESMS.

3.4.2 Roles and Responsibilities

The PIU is responsible for ensuring implementation of the ESMS throughout the Program. Its responsibilities include:

- Coordinating environmental and social management activities;
- Ensuring implementation of the procedures established in the ESMF and other relevant environmental and social instruments agreed upon with the IDB;

- Verifying compliance with applicable environmental and social requirements;
- Coordinating environmental permitting, as required;
- Overseeing implementation of Environmental and Social Management Plans (ESMPs);
- Reviewing environmental and social monitoring reports submitted by contractors;
- Reporting environmental and social performance to the IDB; and
- Coordinating corrective actions where non-compliance is identified.

The allocation of responsibilities among MOHLR, the PIU, contractors, supervising consultants, and other entities during the pre-construction, construction, and operational phases is summarized in Table 3.2.

3.4.3 Contractor Capacity

All contractors engaged under the Program must demonstrate adequate environmental and social capacity to fulfill their contractual obligations.

The Environmental and Social Technical Specifications included in project bidding documents shall establish the minimum environmental, social, labor, occupational health and safety, and reporting requirements applicable to contractors.

Prior to contract award, contractors must demonstrate that they have qualified personnel responsible for environmental and social management, including occupational health and safety.

At a minimum, contractors shall designate:

- An Environmental and Social Manager; and
- A Health and Safety Manager.

The PIU will evaluate the qualifications and experience of the designated personnel as part of the procurement process.

3.4.4 Training and Institutional Strengthening

As maintenance of adequate institutional capacity is essential to ensure effective implementation of the ESMS, the PIU will implement a capacity-building program that includes, as appropriate:

- Training on the IDB Environmental and Social Policy Framework (ESPF);
- Implementation of the Program's ESMS and ESMF;
- Environmental and social risk assessment and management;
- Stakeholder engagement and grievance management;
- Labor and working conditions;
- Occupational health and safety;
- Emergency preparedness and response;
- Monitoring and reporting; and
- Lessons learned and continual improvement.

Training shall be provided to PIU personnel, supervising consultants, contractors, and other relevant stakeholders, as appropriate.

Table 3.2 Institutional responsibilities for E&S management

Project Phase	PIU	Contractor	Supervision Consultant	IDB
Planning & Design	Screening, risk classification, permits, ESA/ESMP review, stakeholder engagement	—	Technical review	No Objection / supervision
Procurement	Include E&S requirements in bidding documents	Submit E&S personnel and methodology	Review	Oversight
Construction	Supervision, monitoring, reporting	Implement CESMP, permits, monitoring, incident reporting	Verify compliance	Supervision missions
Operation	Monitor implementation during initial operation	O&M (if applicable)	Support (if applicable)	Implementation support

Source: 4CR, 2026

3.5 ELEMENT 5: EMERGENCY PREPAREDNESS AND RESPONSE

MOHLR, through the PIU, is responsible for ensuring that emergency preparedness and response measures are incorporated into all projects Program financed projects in accordance with the ESMF, applicable national legislation, and the requirements of the IDB's ESPF.

The level of emergency preparedness required for each project must be commensurate with its potential environmental, social, occupational health and safety, and community health and safety risks.

The ESMF provides guidance for the preparation of project-specific Emergency Preparedness and Response Plans as part of the ESMP or CESMP, as appropriate.

The PIU is responsible to ensure that:

- Emergency preparedness and response measures are incorporated into project-specific ESMPs and CESMPs;
- Emergency response procedures are consistent with the risks identified during the environmental and social assessment process;
- Contractors establish appropriate emergency response procedures, assign responsibilities, and provide the personnel, equipment, and resources necessary to respond effectively to emergency situations;
- Workers receive appropriate training on emergency response procedures and participate in periodic drills, as appropriate;
- Incidents and emergencies are reported, investigated, and corrective actions implemented in accordance with the ESMS and contractual requirements; and
- Lessons learned from emergencies and drills are incorporated into updated emergency response procedures, where necessary.

Project-specific emergency preparedness and response procedures shall address, as appropriate:

- Natural hazards, including hurricanes, flooding, storm surge, and other climate-related events;
- Occupational accidents and medical emergencies;
- Fires, hazardous material spills, and environmental incidents;
- Community health and safety emergencies; and
- Any other foreseeable emergency situations identified during the environmental and social assessment process.

The detailed requirements, minimum content, and implementation procedures for Emergency Preparedness and Response Plans (EPRP) are provided in the Program's ESMF. Based on the potential environmental and social risks and impacts identified in the ESA of the representative sample projects, the ESMF provides guidance for preparing project-specific ESMPs, which will incorporate emergency preparedness and response measures for each new project, along with other applicable plans, such as the DRMP. These plans will be developed as part of the ESMP to maximize coordination and minimize duplication of processes and responsibilities.

3.6 ELEMENT 6: STAKEHOLDER ENGAGEMENT

Stakeholder engagement is a fundamental component of effective environmental and social management. Accordingly, the Program requires transparent, timely, inclusive, and culturally appropriate engagement with project-affected people and other interested stakeholders throughout the project life cycle, in accordance with the requirements of the IDB's ESPF.

The Program's SEF, included in the ESMF, establishes the procedures for stakeholder identification and analysis, information disclosure, consultation, public participation, and the operation of the GRM. Project-specific Stakeholder Engagement Plans (SEPs) must be prepared in accordance with the SEF for all future projects.

The PIU is responsible for ensuring that:

- Stakeholders are identified and engaged throughout project planning, implementation, and operation, as appropriate;
- Relevant environmental and social information is disclosed in a timely and accessible manner;
- Meaningful consultation is undertaken for projects requiring stakeholder engagement under the IDB's ESPF or national legislation; where project-affected people and other stakeholders are subject to identified risks and adverse impacts from a project,
- Stakeholder feedback is documented and considered during project decision-making;
- An accessible, transparent, and responsive GRM is maintained throughout program implementation; and
- Stakeholder engagement activities and grievances are monitored, documented, and reported as part of the Program's environmental and social management system.

The detailed stakeholder engagement procedures, consultation requirements, and operation of the GRM are described in the Program's SEF, included in the ESMF.

3.7 ELEMENT 7: MONITORING AND EVALUATION

MOHLR, through the PIU, is required to establish and maintain procedures to monitor, evaluate, and report on the environmental and social performance of projects financed under the Program. Monitoring and evaluation activities shall verify compliance with the requirements of the ESMS, the ESMF, the IDB ESPF, applicable national legislation, and project-specific environmental and social instruments.

The monitoring system shall be used to:

- Verify the implementation and effectiveness of environmental and social mitigation measures;
- Assess compliance with contractual environmental and social obligations;
- Identify non-conformities and implement corrective actions;
- Evaluate environmental and social performance throughout the project lifecycle; and
- Support continual improvement of the ESMS through lessons learned and adaptive management.

The following subsections describe the monitoring and reporting responsibilities, and supervision, audits, and continuous improvement required to successfully implement the Program's ESMS.

3.7.1 Monitoring and Reporting Responsibilities

During and at the conclusion of construction, contractors are must monitor the implementation of the CESMP and submit periodic environmental and social monitoring reports to the PIU. Unless otherwise specified in the contract documents, these reports shall be submitted on a monthly basis to the PIU and document implementation of mitigation measures, monitoring results, incidents, grievances, corrective actions, and compliance with contractual environmental and social requirements.

Upon completion of construction, the contractor shall submit a Final Environmental and Social Completion Report, summarizing implementation of the CESMP, compliance with environmental and social commitments, monitoring results, outstanding corrective actions, and lessons learned.

The PIU is required to review contractor reports, conduct supervision activities, verify compliance with the ESMS and project-specific environmental and social instruments, and prepare semi-annual environmental and social monitoring reports for submission to the IDB in accordance with the Loan Agreement and Program reporting requirements.

3.7.2 Supervision, Audits, and Continual Improvement

The PIU is responsible for conducting periodic supervision visits and compliance reviews to verify implementation of environmental and social requirements throughout project execution. The IDB may undertake implementation support missions, supervision visits, or environmental and social audits, while the relevant government authorities may conduct inspections to verify compliance with applicable national legislation.

Monitoring findings, audit results, incidents, non-compliance events, stakeholder feedback, and lessons learned shall be used to identify opportunities for corrective actions and continual improvement of the ESMS. Where necessary, environmental and social management measures and procedures shall be updated to improve the effectiveness of the Program's environmental and social performance.

4 SUMMARY

Table 4.1 provides a cross-reference between the seven elements of the ESMS and the principal environmental and social instruments that support their implementation. While the ESMS establishes the institutional framework and management commitments for the Program, the detailed procedures and operational guidance are provided in the ESMF and its associated instruments.

Table 4.1 Cross reference of ESMS elements, instruments and responsibilities

ESMS Element	Purpose	Supporting Instrument(s)	Primary Responsibility
1. Program Environmental and Social Framework	Establishes the Program's environmental and social policy, principles, objectives, and regulatory framework.	ESMF (Legal and Institutional Framework); ESMS	MOHLR / PIU
2. Identification of Risks and Impacts	Ensures projects are screened, classified, and assessed according to their environmental and social risks.	ESMF (Screening, Eligibility, ESA Guidance, Risk Assessment)	MOHLR / PIU
3. Management Programs	Ensures appropriate mitigation measures and management plans are prepared and implemented.	ESMF (ESMP Guidance, CESMP, LMP, Technical Specifications)	MOHLR / PIU / Contractors
4. Organizational Capacity and Competence	Defines institutional arrangements, staffing, responsibilities, and capacity-building requirements.	ESMS; ESMF Roles and Responsibilities; ToR Annexes	MOHLR / PIU
5. Emergency Preparedness and Response	Ensures emergency planning and response measures are integrated into project implementation.	ESMF (Emergency Preparedness and Response Plan; Disaster and Climate Risk Guidance)	MOHLR / PIU / Contractors
6. Stakeholder Engagement	Establishes stakeholder engagement, consultation, information disclosure, and grievance management procedures.	Stakeholder Engagement Framework (SEF); Project-specific SEP, where required	MOHLR / PIU
7. Monitoring, Reporting, and Evaluation	Establishes procedures for monitoring performance, reporting, audits, corrective actions, and continual improvement.	ESMF (Monitoring and Reporting Procedures); ESMS	Contractors / MOHLR / PIU / IDB

Source: 4CR, 2026

5 DOCUMENT CONTROL AND CONTINUAL IMPROVEMENT

The ESMS is a living management system that must be periodically reviewed and updated to ensure its continued effectiveness and relevance throughout Program implementation.

The PIU will be responsible for maintaining the ESMS, ensuring that it reflects changes in the Program, applicable legislation, institutional arrangements, and the requirements of the IDB's ESPF.

The ESMS shall be reviewed periodically and updated, as necessary, based on:

- changes to the Program scope or activities;
- Revisions to the legal and regulatory framework;
- Organizational or staffing changes affecting environmental and social management;
- Findings from environmental and social monitoring, inspections, and audits;
- Incidents, accidents, grievances, and non-compliance events;
- Lessons learned during program implementation;
- Changes to the ESMF or other supporting environmental and social instruments; and
- Recommendations or corrective actions issued by the IDB or other competent authorities.

The PIU must maintain document version control to ensure that only the current approved version of the ESMS is used during Program implementation. All revisions must be documented in the Document Revision History and communicated to relevant personnel and implementing entities, as appropriate.

The effectiveness of the ESMS shall be evaluated as part of the Program's monitoring and reporting process, and opportunities for continual improvement shall be incorporated into future revisions of the system.

ANNEX A.1 MINIMUM QUALIFICATIONS FOR AN ENVIRONMENTAL SPECIALIST

EDUCATION

- Degree in Environmental Engineering, Environmental Science, or related field
- Postgraduate training in environmental management or occupational health and safety

EXPERIENCE

- Minimum 5 years of experience in environmental and social management
- Knowledge of national environmental, social, and OHS regulatory frameworks
- Experience with ISO 14001 and/or IDB, World Bank, or IFC safeguard policies (desirable)

KEY RESPONSIBILITIES

- Integrate environmental and social considerations into project design
- Review contractor reports and approve ESMPs
- Prepare environmental and social requirements in tender documents
- Manage environmental permitting processes
- Monitor compliance with the ESMP during construction
- Track environmental, social, and EHS indicators
- Prepare semi-annual and final program reports
- Deliver training to contractor staff on the Program's IDB requirements.

ANNEX A.2 MINIMUM QUALIFICATIONS FOR A SOCIAL SPECIALIST

EDUCATION

- Degree in Sociology, social work, communications, or related field
- Postgraduate training in social development or project management

EXPERIENCE

- Minimum 8 years of experience in social project management
- Knowledge of national regulations and international standards related on labor, gender inclusion, stakeholder engagement, disability, and child labor.
- Experience working with IDB, World Bank, IFC, or other development agencies safeguards (desirable)

KEY RESPONSIBILITIES

- Integrate social considerations into project design
- Systematize management of social issues across the program
- Prepare environmental and social requirements for tender documents
- Review and approve contractor ESMPs
- Manage the Grievance Mechanism
- Conduct social monitoring and audits during implementation
- Develop community social management plans
- Monitor gender and participation indicators during construction
- Prepare semi-annual and final social reports
- Train contractor staff on social management and IDB ESPS

ANNEX A.3 MINIMUM QUALIFICATIONS FOR A RESETTLEMENT SPECIALIST

EDUCATION

- A bachelor's degree in sociology, anthropology, social sciences, or another relevant discipline.
- A postgraduate degree in a related field is desirable.

EXPERIENCE

- At least seven (7) years of progressively responsible professional experience in land acquisition, involuntary resettlement, social safeguards, or social risk management for infrastructure or urban development projects.
- Demonstrated experience in the preparation or implementation of at least three (3) Resettlement Action Plans (RAPs), Livelihood Restoration Plans (LRPs), or equivalent resettlement instruments, preferably for projects financed by international financial institutions.
- Experience conducting or supervising socioeconomic surveys, household censuses, asset inventories, stakeholder engagement activities, grievance management, and livelihood restoration programs.
- Demonstrated ability to engage effectively with affected communities, including vulnerable and disadvantaged groups, and to facilitate conflict resolution and consensus-building.
- Experience coordinating multidisciplinary teams and working collaboratively with government agencies, contractors, valuation specialists, and other stakeholders.
- Strong analytical, report writing, and communication skills.

KEY RESPONSIBILITIES

- Supervise the detailed census, socioeconomic survey, and asset inventory.
- Oversee the Resettlement Action Plan implementation per IDB ESPS5
- Coordinate stakeholder engagement and operation of the GRM
- Serve as the primary technical focal point for resettlement matters with MOHLR, the IDB, contractors, and affected communities.

ANNEX A.4 MINIMUM QUALIFICATIONS FOR AN OCCUPATIONAL, HEALTH AND SAFETY (OHS) SPECIALIST

EDUCATION

- Degree in Occupational Health, Safety and Hygiene
- Postgraduate training in occupational risk management (desirable)

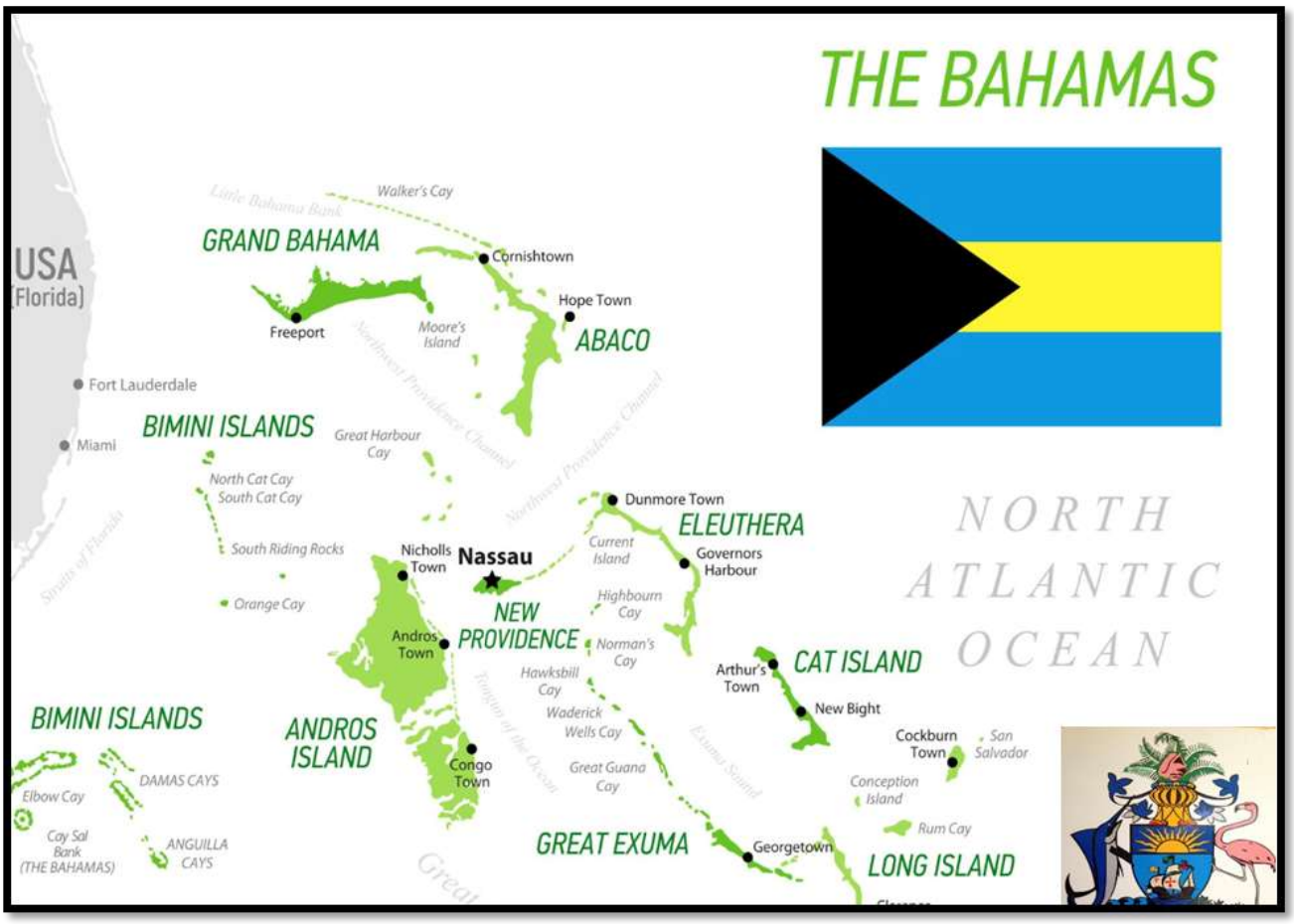
EXPERIENCE

- Minimum 5 years of experience implementing in OHS plans on construction sites
- Knowledge of national EHS regulatory frameworks
- Experience with ISO 14001/ISO 45001 and IDB, World Bank, or IFC ESPS 2 (desirable)

KEY RESPONSIBILITIES

- Integrate occupational, health and safety considerations into project design
- Review contractor OHS reports and approve ESMPs
- Incorporate safety requirements into bidding documents
- Oversee OHS compliance across project sites and surrounding communities
- Conduct regular monitoring and audits of health and safety performance
- Track occupational health and hygiene indicators during construction
- Prepare semi-annual and final program reports
- Coordinate training delivery to project and contractor teams

APPENDIX A – ESMF



Appendix A: Environmental and Social Management Framework (ESMF)

Sustainable Housing for Urban Transformation (BH-1064)

4climate resilience

September 16, 2026

Document Revision:

Rev.	Description	Prepared by	Controlled by	Approved by	Comment
2	ESMF	KA/AC/GP/DC/JE	NV	JE	Fit for Disclosure

4climate resilience

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LIST OF ACRONYMS AND ABBREVIATIONS

Abbreviation	Definition
CESMP	Contractor Environmental and Social Management Plan
DEPP	Department of Environmental Planning and Protection
EA	Executing Agency
EBA	Environmental Baseline Assessment
EIA	Environmental Impact Assessment
E&S	Environmental and Social
EHS	Environmental, Health and Safety
EMP	Environmental Management Plan
EPPA	Environmental Planning and Protection Act
ESA	Environmental and Social Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESPF	IDB Environmental and Social Policy Framework
ESPS	Environmental and Social Performance Standard
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
IDB	Inter-American Development Bank
ILO	International Labour Organization
LMP	Labor Management Procedures
MOHLR	Ministry of Housing and Land Reform
OHS	Occupational Health and Safety
PIU	Program Implementation Unit

Abbreviation	Definition
PPP	Public-Private Partnership
RAP	Resettlement Action Plan
SEA	Sexual Exploitation and Abuse
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
ToR	Terms of Reference

1 EXECUTIVE SUMMARY

This Environmental and Social Management Framework (ESMF) has been prepared for the Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064) ("the Program") to establish the environmental and social management procedures applicable to approved Program projects. The Program is financed by the Inter-American Development Bank (IDB) and implemented by the Ministry of Housing and Land Reform (MOHLR) as a Global of Multiple Works (GOM) project. The Program seeks to improve access to safe, affordable, inclusive, and climate-resilient housing for low- and middle-income households throughout The Bahamas through three complementary components: (i) development of new housing and supporting infrastructure; (ii) rehabilitation and improvement of existing housing stock, including private and public housing; and (iii) institutional strengthening to enhance housing policies, land management, and Program implementation.

The ESMF forms part of the Program's Environmental and Social Management System (ESMS), which provides the overarching system for managing environmental and social performance across the Program. The ESMS establishes the institutional arrangements, organizational responsibilities, procedures, capacity-building requirements, monitoring and reporting protocols, and continual improvement processes necessary to ensure that environmental and social requirements are integrated throughout the Program lifecycle. Within this system, the ESMF establishes the project-level procedures for identifying, assessing, managing, monitoring, and reporting environmental and social risks and impacts associated with Program projects. In this way, the ESMS provides the overall management system for environmental and social performance, while the ESMF provides the framework and procedures through which the ESMS is applied to individual projects.

A representative sample of projects was assessed during preparation of this ESMF, with additional investments to be identified throughout implementation. The representative sample of projects underwent detailed environmental and social assessments (ESAs) during preparation of this Framework to establish the procedures that will govern environmental and social due diligence for all future investments financed under the Program.

To facilitate consistent implementation across the Program, the ESMF includes standardized environmental and social screening procedures, eligibility criteria, an exclusion list, mitigation measures, monitoring requirements, and templates for the preparation of site-specific environmental and social instruments. These project-level procedures are implemented within the institutional and management arrangements established through the ESMS. The ESMF therefore does not establish a separate environmental and social management process but provides the project-level requirements through which the broader ESMS is operationalized for individual Program investments.

The ESMF adopts a risk-based approach to ensure that the level of environmental and social assessment is commensurate with the nature, scale, location, and potential impacts of each project. It establishes procedures for environmental and social screening, risk classification, identification of applicable IDB Environmental and Social Performance Standards (ESPSs), determination of environmental and social instruments, stakeholder engagement, monitoring, reporting, and adaptive management. Through this process, environmental and social risks are identified early in project planning and appropriate avoidance, minimization, mitigation, and monitoring measures are integrated into project design and implementation.

The Program has been classified by the IDB as Environmental and Social Impact Classification (ESIC) Category B, with a Substantial Environmental and Social Risk Rating and a Moderate Disaster and Climate Change Risk Classification. Potential environmental impacts associated with future housing developments and rehabilitation activities include occupational health and safety hazards, dust, noise, construction waste, traffic disruptions, localized flooding, pollution

prevention, and resource efficiency considerations. Potential social impacts include labor management, temporary and permanent physical or economic displacement, community health and safety, differentiated impacts on vulnerable groups, labor influx in the Family Islands, gender-based violence risks, and stakeholder engagement requirements. While these risks are expected to be site-specific and generally manageable through established mitigation measures, the ESMF provides the procedures necessary to ensure that they are consistently identified and addressed across all future projects.

The ESMF supports implementation of applicable IDB ESPSs. Based on the characteristics of each future project, the screening process will determine the applicability of ESPS 1 (Assessment and Management of Environmental and Social Risks and Impacts), ESPS 2 (Labor and Working Conditions), ESPS 3 (Resource Efficiency and Pollution Prevention), ESPS 4 (Community Health, Safety and Security), ESPS 5 (Land Acquisition and Involuntary Resettlement), ESPS 8 (Cultural Heritage), ESPS 9 (Gender Equality), and ESPS 10 (Stakeholder Engagement and Information Disclosure). Although ESPS 6 (Biodiversity Conservation and Sustainable Management of Living Natural Resources) is not anticipated to apply to most Program activities, the Framework includes screening procedures to identify any future projects where biodiversity considerations may require additional assessment. ESPS 7 is not anticipated to apply to any project, as no Indigenous Peoples meeting the requirements of ESPS 7 have been identified in The Bahamas. This approach recognizes that not every project will trigger every ESPS and ensures that environmental and social requirements remain proportionate to the identified risks.

To assist MOHLR in applying the Framework consistently, the ESMF includes a Project Environmental and Social Screening Form (Annex A) to guide users through the environmental and social review process and assist in determining the applicable ESPSs and the environmental and social instruments required for each project. The ESMF also includes an Overall ESMF Application Roadmap (Figure 5.1), which provides a practical roadmap for integrating environmental and social considerations into the MOHLR's project development process. The process begins with verification that a proposed housing project satisfies MOHLR's eligibility criteria before proceeding to environmental and social screening, identification of applicable ESPSs, preparation of environmental and social instruments, implementation, monitoring, and project close-out.

Successful implementation of this Framework will strengthen the MOHLR's capacity to integrate environmental and social considerations into housing investments while promoting transparency, accountability, stakeholder participation, climate resilience, and sustainable development. By establishing consistent procedures for identifying and managing environmental and social risks, and procedures scaled to project nature, the ESMF will help ensure that future Program investments achieve their intended development objectives while complying with the IDB ESPF, applicable national legislation, and international good practice.

2 INTRODUCTION

The Government of the Commonwealth of The Bahamas, through the MOHLR, is implementing the Program with financing from the IDB. The Program supports the Government's efforts to improve access to safe, affordable, inclusive, and climate-resilient housing while strengthening institutional capacity for sustainable housing development and urban resilience.

As part of the IDB's environmental and social due diligence, representative sample projects were assessed prior to loan approval through project-specific ESAs, Environmental and Social Management Plans (ESMPs), and Stakeholder Engagement Plans (SEPs). As additional projects will be identified and designed during Program implementation, this ESMF establishes procedures to ensure that all future investments are assessed consistently and in accordance with the IDB's ESPF.

2.1 OBJECTIVES

The overall objective of this ESMF is to provide a systematic approach for identifying, assessing, managing, monitoring, and reporting environmental and social risks and impacts associated with projects financed under the Program that were not included in the representative sample assessed during Program preparation.

The specific objectives of the ESMF are to:

- Establish a methodology and set of procedures to ensure the environmental and social sustainability of all Program-financed activities;
- Provide a framework for the screening, categorization, assessment, management, and monitoring of environmental and social risks and impacts associated with future projects;
- Define the environmental and social management measures, instruments, and processes required throughout the project cycle, from planning and design through construction, operation, closure and post-closure;
- Provide guidance for compliance with applicable national environmental, social, labor, health and safety, land administration, and planning legislation and regulations;
- Establish procedures to ensure compliance with the IDB's ESPF and the ESPSs applicable to the Program;
- Define institutional roles, responsibilities, and capacity-building requirements for effective implementation of environmental and social risk management measures;
- Establish procedures for stakeholder engagement, information disclosure, grievance management, and ongoing consultation with affected communities and interested parties; and
- Provide mechanisms for environmental and social monitoring, supervision, reporting, and adaptive management during Program implementation.

2.2 RELATIONSHIP BETWEEN THE ESMF AND ESMS

The ESMF forms one component of the Program's ESMS and is presented as Appendix A of the ESMS.

The ESMS establishes the Ministry's institutional framework for managing environmental and social performance throughout the Program. It defines the environmental and social policy, organizational structure, responsibilities, competencies, procedures, monitoring systems,

reporting requirements, and continual improvement processes necessary to implement the Program in accordance with the IDB ESPF.

The ESMF, in contrast, provides the technical framework used to screen, assess, and manage environmental and social risks at the project level. It defines the environmental and social review process, establishes screening criteria, identifies the applicable ESPS, and specifies the environmental and social instruments that may be required for individual projects at project scale.

Accordingly, the ESMF describes what environmental and social due diligence is required for each project, while the ESMS establishes how the Ministry will implement, oversee, monitor, and continually improve these processes throughout the life of the Program.

2.3 SCOPE OF THE ESMF

The ESMF applies to all projects and activities financed under the Program, regardless of location or component, that were not included in the representative sample assessed during Program preparation. It covers activities associated with new housing developments, rehabilitation of existing housing, supporting infrastructure, and other eligible investments implemented under the Program.

The ESMF addresses environmental and social issues that may arise during planning, design, construction, operation, maintenance, and project close-out. It provides procedures to identify and manage impacts and risks related to labor and working conditions, resource efficiency, pollution prevention, community health and safety, land acquisition and involuntary resettlement, cultural heritage, gender equality, stakeholder engagement, climate resilience, and disaster risk, as applicable to each project.

Because future projects may differ in scale, complexity, and location, the ESMF adopts a risk-based approach under which the environmental and social review process and required management measures are commensurate with the potential environmental and social risks and impacts identified during screening.

The ESMF shall be applied by MOHLR, as well as by contractors, consultants, and other entities involved in the planning, design, construction, operation, and maintenance of Program-financed investments.

2.4 APPLYING THE ESMF

The ESMF is intended to serve as the Ministry's operational guide for environmental and social due diligence throughout Program implementation. Figure 5.1 illustrates the Environmental and Social Screening and Approval Process for Program Projects. The process begins with verification that a proposed housing project under the loan satisfies the Ministry's eligibility criteria before proceeding to environmental and social screening, determining the applicable ESPSs, preparation of environmental and social instruments, implementation of mitigation measures, and ongoing monitoring throughout the project lifecycle.

To support consistent application of the Framework, the ESMF includes a Project Environmental and Social Screening Form (Annex A), which assists Ministry staff in identifying environmental and social impacts and risks, determining the applicable ESPSs, and establishing the environmental and social instruments required for each project based on its respective characteristics.

3 PROGRAM DESCRIPTION

The Program seeks to improve access to adequate, resilient, and affordable housing for households in The Bahamas while strengthening the institutional capacity of the housing sector. The Program responds to persistent housing deficits, vulnerability to natural hazards, and the need for more sustainable and inclusive urban development, particularly in communities affected by hurricanes and other climate-related events.

The Program will support investments in housing construction, housing rehabilitation and upgrading, and institutional strengthening activities to improve the planning, delivery, and management of housing programs throughout the country. Activities are expected to be implemented primarily in New Providence, Grand Bahama, and Abaco, although additional locations may be identified during implementation. The Program has been designed as a multiple-works operation. Representative sample projects were assessed during Program preparation, while additional projects will be identified and developed during implementation. This ESMF establishes the procedures for environmental and social due diligence for those additional projects.

3.1 COMPONENTS

The Program has the following components:

Table 3.1 Component and cost

Component and Cost	Description
Component I – New Housing (36 US million)	Increase the supply of adequate housing by delivering 3 types of products on land with clear titles: (i) well-located lots located in or adjacent to an urban footprint. Provide adequate zoning, development rights, and direct access to urban services for private investment in new housing; (ii) direct construction of housing in well-located and serviced lots; and (iii) projects for the rehabilitation of clusters of underused or abandoned housing units that are well-located and adequately serviced.
Component II – Improvement of the Existing Housing Stock (10 US million)	Expand access to housing improvement solutions through grants and concessional financing for home repairs, resilience retrofits, and construction of auxiliary housing units while supporting rehabilitation and upgrading of public housing estates
Component III – Institutional Strengthening and Regulatory Reform (2 US million)	Strengthen institutional capacity and improve the regulatory environment governing housing development, land management, permitting, urban regeneration and housing finance.
Project Administration and Management (2 US million)	These activities will finance the implementation unit management costs, including staffing, auditing, monitoring, and supervision, as well as the program's intermediate and final evaluation.

Source: IDB, 2026

3.2 BENEFICIARIES

The primary beneficiaries of the Program are low- and moderate- income households that face housing deficits, inadequate living conditions, or increased vulnerability to natural hazards and climate-related risks. Beneficiaries may include homeowners, tenants, and households requiring access to new affordable housing opportunities.

Particular attention will be given to vulnerable and underserved groups, including female-headed households, older persons, persons with disabilities, low-income families, and households affected by hurricanes or other natural disasters.

The Program will also generate indirect benefits for local communities through improved neighborhood infrastructure, enhanced resilience to climate and disaster risks, increased access to basic services, improved public health and safety conditions, and job creation associated with construction and rehabilitation activities.

Institutional beneficiaries include the Ministry of Housing and Land Reform (MOHLR) and other public sector entities involved in housing policy, planning, regulation, and service delivery. Through technical assistance and capacity-building activities, the Program will strengthen the government's ability to develop, implement, and monitor sustainable housing initiatives throughout The Bahamas.

3.3 EXECUTION ARRANGEMENT

The execution of the Program will be governed by the Loan Contract between the Government of The Commonwealth of Bahamas and the IDB, as well as any subsidiary agreements, implementation arrangements, and operational instruments required for Program implementation.

The MOHLR will serve as the Executing Agency (EA) and will be responsible for ensuring compliance with the provisions of the Loan Contract, applicable national legislation, and the IDB ESPF.

Contractors, consultants, and other entities engaged under the Program will be required to comply with the environmental, social, health and safety, labor, and stakeholder engagement requirements established in the Program's environmental and social instruments, including this ESMF.

3.4 TYPICAL ACTIVITIES DURING PROJECT IMPLEMENTATION

It is anticipated that Projects to be financed under the Program will have the following activities. The E&S Management of the activities is presented in Section 5 of this report.

Table 3.2 Typical project activities per program component

Component	Description	Typical Phase	Typical Activities per phase
Component I – New Housing	Increase the supply of adequate housing by delivering 3 types of products: on land with clear titles: (i) well-located lots located in or adjacent to an urban footprint. Provide adequate zoning, development rights, and direct access to urban services for private investment in new	• Design Phase	i, ii) New housing • Rezoning, Subdivision surveying, Engineering concept and design iii) Rehabilitation of clusters: • In addition to the above, hazardous waste

Component	Description	Typical Phase	Typical Activities per phase
	housing; (ii) direct construction of housing in well-located and serviced lots; and (iii) projects for the rehabilitation of clusters of underused or abandoned housing units that are well-located and adequately serviced.		assessment prior to demolition
		• Pre-Construction	iii) Rehabilitation of clusters: • Abatement of any Hazardous waste materials and demolition
		• Construction	i, ii and iii) • Housing development construction activities (clearing, excavation, construction of single or multifamily units, utilities, septic tanks, etc.)
		• Closure*	i, ii and iii) • Closure of temporary installations
		• Operation and Maintenance	i, ii and iii) • Maintenance associated with housing (regular and after storms/hurricanes)
Component II – Improvement of the Existing Housing Stock	Expand access to housing improvement solutions through grants and concessional financing for home repairs, resilience retrofits, and construction of auxiliary housing units while supporting rehabilitation and upgrading of public housing estates	• Pre-mobilization	• Agreement with Homeowner • Rehabilitation works design
		• Construction	• Rehabilitation/repairs inside home or outer perimeter
		• Operation and Maintenance	• Maintenance associated with the rehabilitation works (regular and post storm/hurricane)

Source: IDB, 2026 Adapted 4CR.

Note*: For the purposes of this report, the closure phase refers to the decommissioning and removal of temporary facilities related to construction of the housing development.

3.5 SUMMARY OF POTENTIAL E&S IMPACTS IDENTIFIED IN THE SAMPLE PROJECTS

In this section, we describe the main potential environmental (physical and biological) and social risks associated with projects under the Program during construction and operation.

Table 3.3 Potential environmental and social impacts

Project Phase	Physical	Biological	Socioeconomic
Design			Increased safe housing stock for low-middle income families
			Social exclusion of vulnerable groups
			Inequitable access to housing benefits
Construction	Land disturbance	Vegetation removal	Occupational injuries and health impacts
	Soil erosion and sediment generation	Temporary habitat loss	Community health and safety impacts
	Air emissions and dust generation	Wildlife disturbance	Exposure of communicable disease transmission
	Noise and vibration generation	Fauna displacement	Labor and community conflicts
	Soil and water contamination	Small fauna mortality	Sexual Exploitation, Abuse and Sexual Harassment Risk
	Waste generation	Impacts on ecosystem services	Physical and economic displacement
	Hazardous substance releases		Cultural heritage disturbance
	Increased resource consumption		Reduced local employment opportunities
	Wastewater generation		
	Utility disruptions		
	Traffic impacts		
Operation	Wastewater generation	Reduction in vegetation cover	Improved housing conditions and resilience

Project Phase	Physical	Biological	Socioeconomic
	Soil and groundwater contamination	Long-term ecosystem disturbance	Community health impacts
	Increased demand for water and energy		Unequal distribution of project benefits
	Infrastructure failure during extreme events		
Closure	Residual contamination	Habitat recovery	Reduction in employment opportunities
	Demobilization emissions	Vegetation regeneration	Reduction in construction-related disturbances
	Construction waste generation		

Source: 4CR, 2026

4 LEGAL AND INSTITUTIONAL FRAMEWORK APPLICABLE TO THE PROGRAM

4.1 INTRODUCTION

This chapter provides an overview of the institutional roles and responsibilities required for Program implementation, together with the applicable legal, regulatory, and policy framework. The legal and regulatory framework comprises environmental legislation, land-use planning regulations, public health requirements, labor legislation, disaster risk management policies, housing regulations, utility regulations, and cultural heritage protection measures.

As the IDB-financed Program aims to improve access to resilient, safe, and affordable housing while strengthening the Government of the Commonwealth of The Bahamas' capacity to address housing deficits and climate vulnerability, it is subject to both the national legal and regulatory framework of The Bahamas and the requirements of the IDB's ESPF.

For each project financed under the Program, the applicable legal, regulatory, policy and institutional requirements should be identified and assessed as part of the environmental and social due diligence process.

4.2 INSTITUTIONAL ROLES AND RESPONSIBILITIES FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT

Implementation of the Program will require coordination among multiple national, local, and utility agencies responsible for environmental management, development planning, housing, infrastructure, public health, labor regulation, disaster risk management, land administration, cultural heritage protection, and utility service provision.

The institutions described below will have primary responsibilities for project planning, permitting, implementation, compliance monitoring, and environmental and social oversight.

4.2.1 Ministry of Housing and Land Reform (MOHLR)

The MOHLR is the Executing Agency for the Program and is responsible for national housing policy, affordable housing programs, urban renewal initiatives, community development, and government-supported residential development projects.

The MOHLR is responsible for:

- Overall project implementation and coordination;
- Land acquisition;
- Management of IDB financing requirements;
- Beneficiary identification and housing allocation processes;
- Oversight of environmental and social risk management;
- Stakeholder engagement and public consultation;
- Oversight of land tenure verification and housing eligibility;
- Monitoring compliance with environmental and social commitments; and
- Coordination with regulatory agencies and utility providers.

4.2.2 Grand Bahama Port Authority (GBPA)

If a project under the Program is located in Grand Bahama, The Grand Bahama Port Authority (GBPA) is the primary regulatory authority and plays a central role in development regulation within Grand Bahama and exercises planning and development control functions under the Hawksbill Creek Agreement.

Through its Building and Development Services Department and Environmental Management Unit, GBPA is responsible for:

- Development approvals;
- Building permit review;
- Site development approvals;
- Utility coordination;
- Environmental review of proposed developments, including demolition permits;
- Construction inspections; and
- Compliance monitoring within the Port Area.

4.2.3 Ministry of the Environment and Natural Resources

The Ministry of the Environment and Natural Resources is the principal authority responsible for environmental policy development, environmental protection, natural resource management, biodiversity conservation, climate policy, and environmental governance in The Bahamas.

The Ministry provides strategic oversight of environmental planning and is responsible for the administration and implementation of environmental legislation, including the Environmental Planning and Protection Act (EPPA), 2019.

The Ministry oversees several agencies relevant to the Project, including:

- Department of Environmental Planning and Protection (DEPP);
- Department of Environmental Health Services (DEHS);
- Department of Forestry.

4.2.3.1 Department of Environmental Planning and Protection (DEPP)

DEPP is the primary environmental regulatory authority in The Bahamas and is responsible for:

- Environmental screening;
- Review of environmental assessment documentation;
- Issuance of Environmental Clearance Certificates where required;
- Review of environmental management measures;
- Monitoring compliance with permit conditions; and
- Investigation of environmental complaints and incidents.

DEPP also coordinates reviews with other technical agencies where biodiversity, wetlands, coastal resources, groundwater resources, or other environmentally sensitive receptors may be affected.

4.2.3.2 Department of Environmental Health Services (DEHS)

DEHS is responsible for environmental health protection, sanitation, waste management oversight, public health protection, vector control, and environmental nuisance management.

The Department provides technical review and oversight regarding:

- Construction waste management;
- Waste collection and disposal;
- Sanitation requirements;
- Public health protection measures;
- Vector control; and
- Community health concerns.

4.2.3.3 Department of Forestry

The Department of Forestry is responsible for the conservation and sustainable management of forests, native vegetation, terrestrial ecosystems, and protected plant species in The Bahamas. Where project activities involve the removal of protected trees, the Department administers the permit process and reviews applications. A permit to harvest a protected tree must be obtained before any protected tree is removed.

4.2.4 Disaster Risk Management Authority

The Disaster Risk Management Authority is responsible for disaster preparedness, response, recovery, and resilience planning in The Bahamas.

Given Grand Bahama's exposure to hurricanes, storm surge, flooding, and climate-related hazards, the Authority provides technical guidance regarding:

- Hurricane resilience;
- Flood risk management;
- Emergency preparedness planning;
- Disaster recovery planning; and
- Community resilience measures.

4.2.5 Department of Gender and Family Affairs

The Department of Gender and Family Affairs is responsible for promoting gender equality, social inclusion, and protection of vulnerable populations.

The Department support the Project through guidance on:

- Gender-responsive housing allocation;
- Vulnerable household considerations;
- Gender-based violence prevention measures;
- Social inclusion initiatives; and
- Community outreach activities.

4.2.6 Department of Labor

The Department of Labor administers labor legislation and oversees compliance with employment standards and occupational health and safety requirements.

Responsibilities relevant to the Project include:

- Enforcement of labor legislation;
- Occupational health and safety oversight;
- Worker welfare;
- Employment dispute resolution; and
- Monitoring compliance with labor standards.

4.2.7 Antiquities, Monuments and Museums Corporation (AMMC)

The Antiquities, Monuments and Museums Corporation is the statutory body responsible for the protection, preservation, conservation, and management of the cultural heritage of The Bahamas. Established under the Antiquities, Monuments and Museums Act, the Corporation oversees archaeological, historical, and cultural resources, including monuments, heritage sites, and artifacts. In the context of the proposed Project, the AMMC may be consulted where development activities have the potential to affect known or previously unidentified cultural heritage resources and may provide guidance regarding heritage protection measures and chance finds procedures.

4.2.8 Department of Lands and Surveys

The Department of Lands and Surveys, under the office of the Prime Minister, is responsible for land administration, cadastral surveys, Crown Land management, and land tenure verification.

The Department supports the Project through:

- Verification of land ownership;
- Survey review;
- Boundary confirmation;
- Land tenure assessment; and
- Administration of Crown Land transactions where applicable.

4.2.9 Ministry of Works

The Ministry of Works, through the Department of Physical Planning (DPP), reviews development applications for demolition and building construction as part of the building permit approval process. The Department assesses submitted plans and supporting documentation for compliance with the Bahamas Building Code, applicable planning requirements, and other relevant regulations before construction permits are issued.

4.2.10 The Ministry of Finance

The Ministry of Finance is the Government entity responsible for overseeing the national Public-Private Partnership (PPP) framework in The Bahamas. Under the Government's PPP Policy Framework, the Ministry provides oversight of PPP program implementation, evaluates fiscal

and financial implications of proposed PPP transactions, and supports the governance, procurement, and approval processes associated with PPP projects.

For the Bahamas Housing Program, should housing developments be implemented through a PPP model, the Ministry of Finance would play a key role in reviewing project affordability, assessing value for money, evaluating fiscal risks and contingent liabilities, and supporting the approval and contractual oversight of PPP arrangements to ensure alignment with national fiscal and development objectives.

4.2.11 Utility Service Providers

Utility service providers with responsibilities relevant to the housing project include:

- Water and Sewerage Corporation (WSC);
- Bahamas Power and Light Company;
- Telecommunications providers; and
- Solid waste management service providers.

In Grand Bahama, utility services providers with responsibilities relevant to housing projects include:

- Grand Bahama Utility Company;
- Grand Bahama Power Company.

These entities will review servicing requirements and coordinate utility connections and infrastructure upgrades necessary to support the Project.

4.3 APPLICABLE LEGAL AND REGULATORY FRAMEWORK

The following tables summarize the principal national and local legislation, regulations, policies, and international agreements applicable to the Program. Together, these instruments establish the legal and regulatory requirements governing the planning, construction, operation, and environmental and social management of the Program.

4.3.1 National Legislation and International Conventions Applicable to the Project

Table 4.1 Principal national legislation and International Conventions

National Legislation / Regulation	Relevance
Hawksbill Creek Agreement (1995, as amended)	Establishes the governance framework for the Freeport Port Area and confers planning and development control responsibilities on the Grand Bahama Port Authority (GBPA), including the review of development applications, building approvals, and coordination of infrastructure and utility services.
Environmental Planning and Protection Act, 2019	Principal environmental legislation establishing DEPP and the framework for environmental planning, pollution control, biodiversity conservation, climate adaptation, environmental permitting, monitoring, enforcement, and public participation.

National Legislation / Regulation	Relevance
Environmental Impact Assessment Regulations, 2020	Establishes environmental screening, EIA requirements, environmental authorization certificates, public consultation, monitoring, compliance inspections, and enforcement procedures.
Environmental Planning and Protection (Extension of Application) Order, 2020	Extends the application of the EPPA and associated regulations throughout The Bahamas, including all islands and cays.
Planning and Subdivision Act, 2010	Provides the framework for land-use planning, subdivision approvals, development control, zoning compliance, and planning permissions.
Crown Lands Act 1917	Governs the administration, allocation, leasing, and disposal of Crown Lands relevant to housing developments on government-owned land.
Acquisition of Land Act 1913	Provides procedures for compulsory acquisition of private property and compensation requirements.
Forestry Act, 2010	Regulates conservation and management of forest resources and protected terrestrial ecosystems.
National Parks Act 1959	Provides for establishment and management of national parks and protected areas.
Disaster Risk Management Act, 2022	Establishes the DRM Authority and the framework for disaster preparedness, mitigation, response, recovery, and resilience.
Bahamas Building Code 2003	Establishes minimum standards for building design, construction, safety, accessibility, and hurricane resilience.
PPP Policy Framework 2018	Governs development, procurement, risk allocation and implementation of PPP projects.
Public Roads Act 1968	Governs planning, construction, maintenance, and management of public roads and associated infrastructure.
Water and Sewerage Corporation Act 1976	Regulates public water supply and wastewater services and supporting utility infrastructure.
Health Services Act and Environmental Health Services Regulations for fees (1989) and collection and disposal of waste (2004)	Establishes public health, sanitation, environmental health inspection, wastewater, and nuisance control requirements.
Employment Act 2001	Establishes minimum employment standards and worker protections.
Health and Safety at Work Act, 2002	Establishes occupational health and safety requirements and employer responsibilities.

National Legislation / Regulation	Relevance
Industrial Relations Act 1970	Regulates labor relations, collective bargaining, and dispute resolution.
National Insurance Act 1972	Establishes social insurance obligations for employers and workers.
Antiquities, Monuments and Museums Act 1998	Protects archaeological resources, historic sites, monuments, and cultural heritage assets.
Local Government Act 1996 repealed by the Local Government Act 2024	Establishes local government authorities and supports community participation and local coordination.
Physical Landscape of The Bahamas (Protection and Conservation) Act 1997	Provides for protection of significant natural landscapes and environmentally sensitive areas.
Bahamas National Climate Change Policy 2005	Supports climate adaptation, resilience, and low-carbon development.
Nationally Determined Contribution (NDC) under the Paris Agreement (latest update on 2022)	Provides national commitments related to climate mitigation and adaptation.

Source: 4CR, 2026

4.3.2 International Agreements applicable to the Program

Table 4.2 International Agreements

International Convention / Policies	Relevance
The Ramsar Convention	The Bahamas is signatory to the Convention on Wetlands of International Importance, also known as the Ramsar Convention. This Convention provides a framework for the international protection of wetlands as contributors for human resources and for avifauna, which do not adhere to international boundaries.
The Convention on Biological Diversity	The Bahamas is a signatory to the Convention on Biological Diversity, which came into force December 1993. It has three main goals: 1. The Conservation of biological diversity. 2. The sustainable use of components of biological diversity. 3. The fair and equitable sharing of the benefits arising out of the utilization of genetic resources.
International Labor Organization	The Bahamas is a member of the International Labor Organization (ILO), a United Nations agency that promotes labor rights, decent work, and fair working conditions. Ratified ILO conventions provide a framework for the protection of workers and the implementation of internationally recognized labor standards. The following Fundamental Conventions are in Force:

International Convention / Policies	Relevance
	• C029 - Forced Labor Convention, 1930 (No. 29), 25 May 1976 • C087 - Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87), 14 Jun 2001 • C098 - Right to organize and Collective Bargaining Convention, 1949 (No. 98), 25 Mat 1976 • C100 - Equal Remuneration Convention, 1951 (No. 100), 14 Jun 2001 • C105 – Abolition of Forced Labor Convention, 1957 (No. 105), 25 May 1976 • C111 – Discrimination (Employment and Occupation) Convention, 1958 (No. 111), 14 Jun 2001 • C138 - Minimum Age Convention, 1973 (No. 138), 31 Oct 2001 (Minimum age specified: 14 years), 31 Oct 2001 • C182 – Worst Forms of Child Labor Convention, 1999 (No. 182), 14 Jun 2001 The following Fundamental Conventions will enter into Force on June 12, 2027: • C155 - Occupational Safety and Health Convention, 1981 (No. 155), 12 Jun 2026 • C187 – Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187)
The United Nations Convention to Combat Desertification	This Convention provides a framework for addressing land degradation, promoting sustainable land management, and enhancing resilience to drought and environmental change.
United Nations Framework Conventions on Climate Change	This Convention establishes the global framework for addressing climate change through greenhouse gas mitigation, adaptation, and international cooperation.
Vienna Protocol for the Protection of the Ozone Layer	This international agreement promotes cooperation among countries to protect the ozone layer from activities that may adversely affect human health and the environment.
International Convention on Oil Pollution Preparedness, Response and Cooperation (OPRC)	This Convention establishes measures for preparedness, response, and international cooperation in the event of marine oil pollution incidents.
Montreal Protocol on Substances that Deplete the Ozone Layer	This Protocol establishes legally binding measures to phase out substances that contribute to ozone layer depletion.
Stockholm Convention on Persistent Organic Pollutants, 2004	This Convention aims to eliminate or restrict the production and use of persistent organic pollutants (POPs).
International Convention for the Safety of Life at Sea (SOLAS), 1974 and the Protocols of 1978 and 1988	The SOLAS Convention primarily specifies minimum standards for the construction, equipment, and operation of ships, compatible with their safety. Flag States are

International Convention / Policies	Relevance
	responsible for ensuring that ships under their flag comply with its requirements, and several certificates are prescribed in the Convention as proof that this has been done.

Source: 4CR, 2026. Adapted from The Ministry of Foreign Affairs.

4.4 PERMITTING REQUIREMENTS

Program projects will require a number of national and local permits, approvals, authorizations, and utility clearances prior to and during implementation. The final permitting requirements will depend on the detailed design, demolition requirements, utility upgrades, infrastructure rehabilitation activities, environmental risks identified during final design, and any modifications to the project footprint.

Table 4.3 Anticipated permitting and approval requirements

Permit/ Approval	National or Local Authority
Environmental Screening Determination	DEPP
Environmental Clearance Certificate	DEPP
Cultural Heritage Clearance (if required)	AMMC
Subdivision Permit	Department of Physical Planning - Ministry of Works and Family Islands Affairs
Site Clearance Authorization	DEPP / Forestry
Road Access Approval	Department of Public Works
Water, Wastewater and Utility Servicing Approval	WSC
Waste Disposal Approval	Department of Public Works
Demolition Permit	Department of Public Works
Crown Land Lease / Allocation	Department of Lands and Surveys / Ministry of Housing and Land Reform
Building Permit	Ministry of Works and Family Islands Affairs
Electrical Connection Approval	BPL

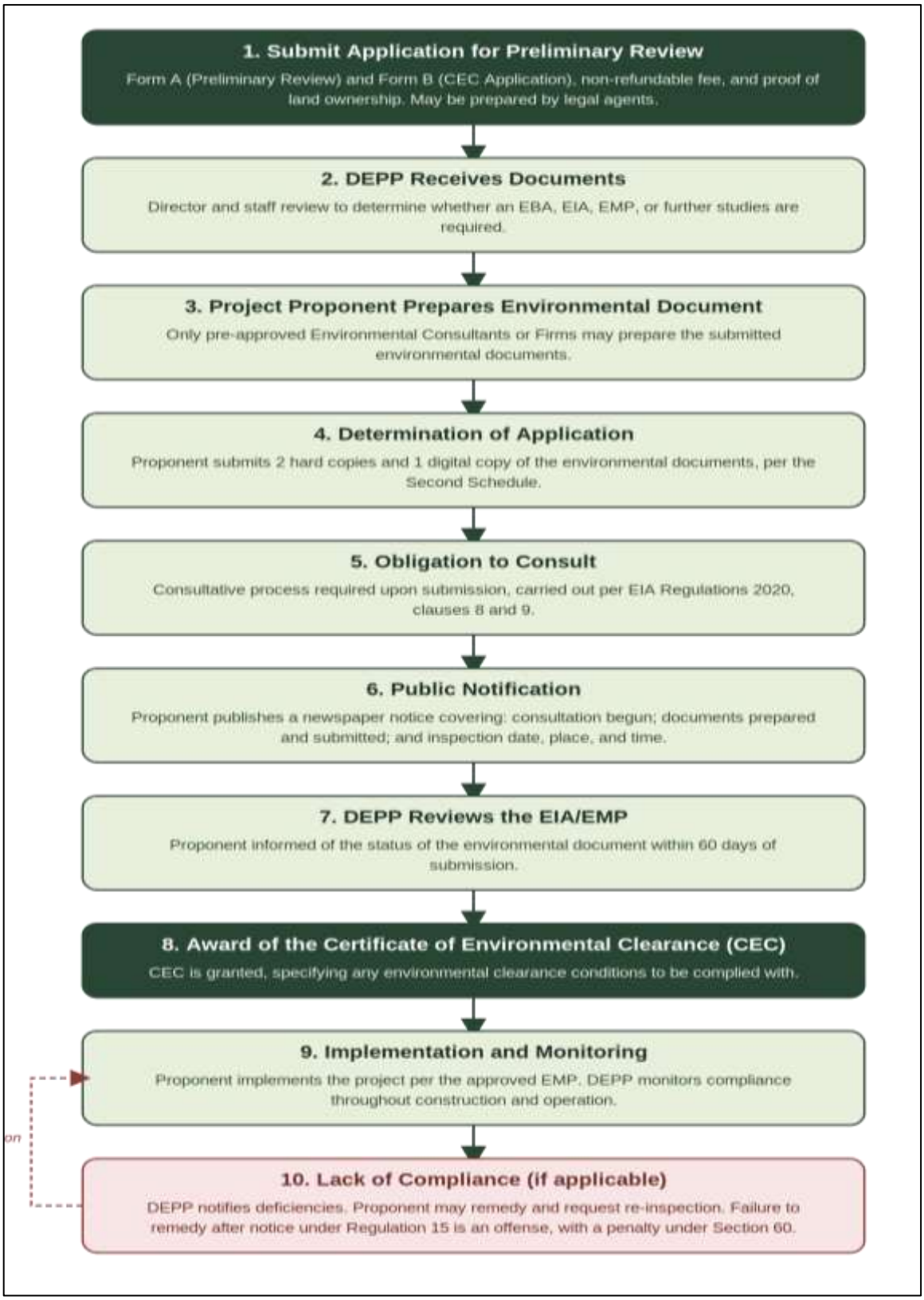
Permit/ Approval	National or Local Authority
Fire Safety Clearance	Fire Services Department

Source: 4CR, 2026. Adapted from The Ministry of Works and Family Islands Affairs and GBPA.

4.4.1 DEPP Environmental Clerance Process

The following figure describes the process for obtaining the Environmental Clearance Process.

Figure 4.1 DEPP Environmental clearance process



Source: DEPP, 2026 *EBA: Environmental Baseline Assessment; EIA: Environmental Impact Assessment; EMP: Environmental Management Plan

4.5 IDB ENVIRONMENTAL AND SOCIAL POLICY FRAMEWORK

The ESPF establishes ten ESPSs designed to identify, avoid, minimize, mitigate, and manage environmental and social risks and impacts associated with IDB-financed operations, identified below based on applicability.

Table 4.4 Applicability of IDB environmental and social performance standards to the Program

ESPS	Applicability	Justification
ESPS 1 – Assessment and Management of Environmental and Social Risks and Impacts	Applicable	The Program includes new housing developments, rehabilitation of existing housing, demolition, site preparation, infrastructure improvements, and associated facilities. These activities require environmental and social screening and assessment to identify and evaluate potential environmental and social risks and impacts.
ESPS 2 – Labor and Working Conditions	Applicable	The Program will involve direct workers, contracted workers, subcontractors, and suppliers engaged in construction, rehabilitation, housing improvements, and Program management activities. Occupational health and safety risks, labor influx and contractor management are relevant considerations.
ESPS 3 – Resource Efficiency and Pollution Prevention	Applicable	Construction and rehabilitation activities will generate construction waste, wastewater, dust, noise, air emissions, and the use of fuels and hazardous materials. Activities will also require the consumption of water, energy, and construction materials.
ESPS 4 – Community Health, Safety and Security	Applicable	Construction, demolition, and rehabilitation activities may affect surrounding communities through traffic disruptions, dust, noise, vibration, temporary access restrictions, and construction-related hazards. Some rehabilitation activities may occur while residents remain in their homes. The Project is also exposed to hurricane, flooding, sea-level rise, and storm surge hazards.
ESPS 5 – Land Acquisition and Involuntary Resettlement	Applicable	The Program includes redevelopment of deteriorated residential areas, land acquisition, land consolidation, and rehabilitation activities that will require temporary or permanent physical displacement, economic displacement, or loss of access to assets and livelihoods.
ESPS 6 – Biodiversity Conservation and Sustainable Management	Applicable	The Program includes the potential development of housing on sites that may have involved the conversion or degradation of natural habitats

ESPS	Applicability	Justification
of Living Natural Resources		within the preceding five years. These sites shall be screened and assessed in accordance with IDB ESPS 6.
ESPS 7 – Indigenous Peoples	Not Applicable	No Indigenous Peoples meeting the requirements of ESPS 7 have been identified in The Bahamas.
ESPS 8 – Cultural Heritage	Applicable	Ground disturbance, excavation, and construction activities may result in the accidental discovery of previously unidentified archaeological, paleontological, historical, or cultural heritage resources.
ESPS 9 – Gender Equality	Applicable	Housing allocation, land acquisition, resettlement, labor influx, construction activities, and stakeholder engagement may result in differentiated impacts on women and vulnerable groups and may present risks related to sexual and gender-based violence.
ESPS 10 – Stakeholder Engagement and Information Disclosure	Applicable	The Program affects existing residents, homeowners, tenants, businesses, government agencies, and surrounding communities and requires stakeholder engagement and information disclosure throughout the project lifecycle.

Source: 4CR, IDB, 2026

Because individual projects may present different site-specific conditions, each project shall be screened against all the applicable ESPSs for the Program, using the process and criteria set out in Section 5, including Table 5.2 to definitively determine specific applicability of the ESPSs.

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

5.1 INTRODUCTION

The ESMF establishes the environmental and social management procedures applicable to projects proposed for financing under the Program. It provides a systematic framework for identifying, assessing, managing, monitoring, and reporting environmental and social risks and impacts associated with projects that were not included in the representative sample assessed during Program preparation.

All projects proposed for financing under the Program shall follow the environmental and social management process established in this Section. The process is designed to ensure that environmental and social requirements are proportionate to the nature, scale, location, and potential risks and impacts of each project and are consistent with the IDB ESPF, applicable Bahamian legislation and regulatory requirements, and the commitments established for the Program. The ESMF is intended to provide MOHLR with a practical and integrated process for incorporating environmental and social considerations into project development and implementation, rather than creating separate or parallel assessment processes.

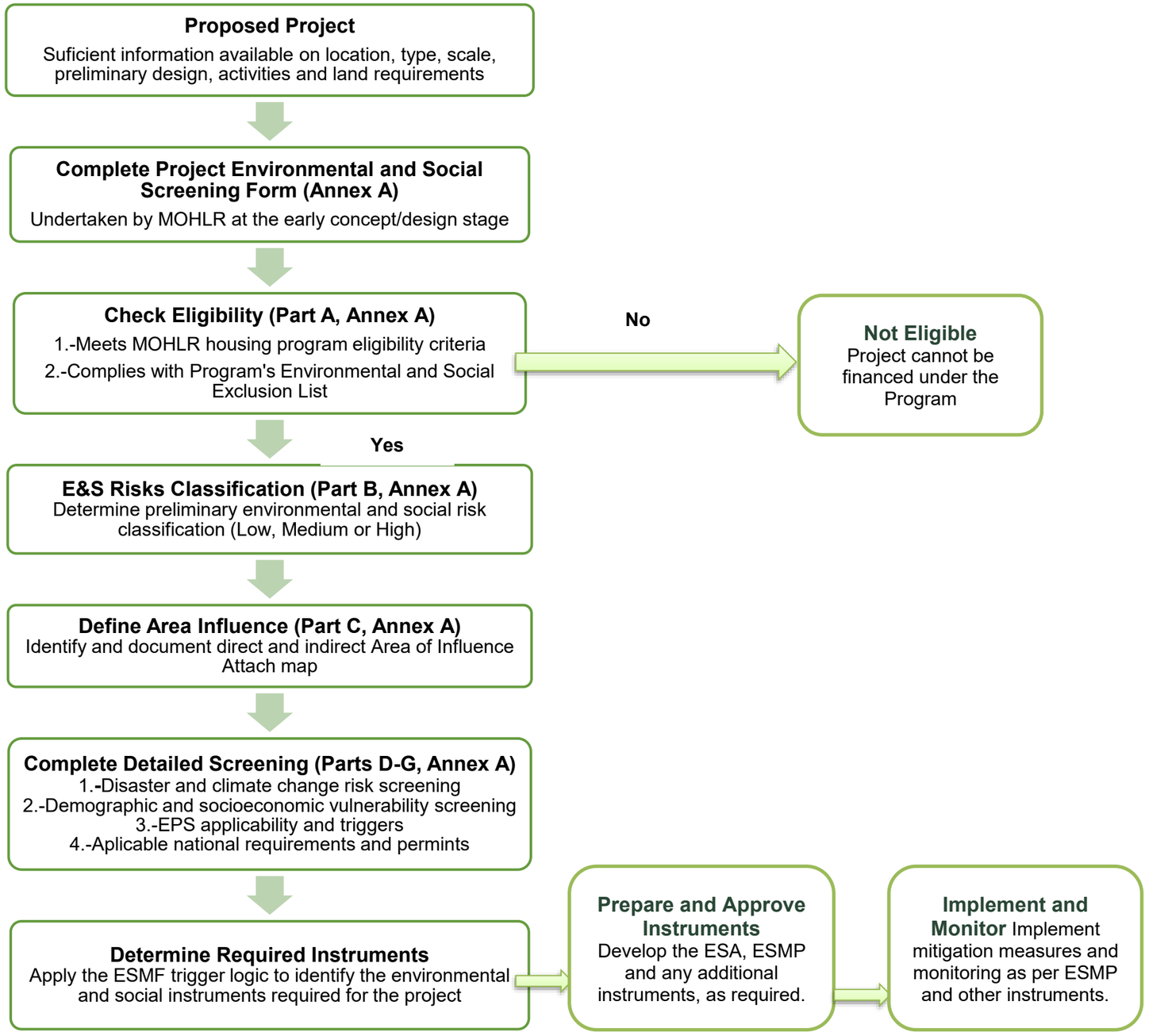
The Project Environmental and Social Screening Form in Annex A is the primary project-level screening and decision-support tool for applying the ESMF. Screening shall be undertaken at the early project concept and design stage, once sufficient information is available regarding the proposed project's location, type, scale, activities, preliminary design, land requirements, and potential Area of Influence, and before preparation of the project-specific ESA, ESMP, or other environmental and social instruments. The completed Annex A establishes the project's eligibility, preliminary environmental and social risk classification, applicable ESPSs, national environmental requirements, disaster and climate change risk requirements, and the environmental and social assessment and management requirements applicable to the project. It therefore provides the principal link between project eligibility, environmental and social screening, assessment, and management.

The application of the ESMF follows a clear process, illustrated in Figure 5.1. Section 5 establishes the overall ESMF process and requirements, while Annex A provides the project-specific screening and decision record. The screening results are used to determine the project's environmental and social eligibility, applicable ESPSs, preliminary risk classification, national environmental requirements, and environmental and social assessment and management needs. Table 5.2 provides the corresponding trigger logic, linking the results of screening to the appropriate assessment or management response. It provides a concise reference for determining what action is required when a particular environmental or social risk, impact, or another trigger is identified. The detailed provisions of Sections 5.2–5.9 explain how these screening results are translated into the appropriate assessment, risk management, stakeholder engagement, monitoring and implementation requirements throughout the project cycle.

The ESMF annexes provide Guidance Documents that include templates, procedures, technical guidance, and management requirements to support implementation of the project-level requirements identified through screening. The Guidance Documents are not automatically applicable to every project. Their applicability shall be determined through Annex A and the subsequent project assessment. Depending on the nature and significance of the identified risks and impacts, requirements contained in an ESMF Guidance Document may be incorporated directly into the project ESA and/or ESMP, developed as a section or subsection of those documents, or prepared as a standalone project-specific instrument where warranted. Where a Guidance Document is triggered, its applicable requirements shall be coordinated with the ESA, ESMP, Stakeholder Engagement Plan (SEP), and other applicable project instruments to

ensure consistency, avoid duplication, and maintain a coherent set of environmental and social commitments.

Figure 5.1 ESMF Roadmap for BH-L1064 Projects



Source: 4CR, 2026.

5.2 PROJECT ELIGIBILITY

Before initiating the environmental and social screening process, MOHLR shall review each proposed project to confirm that it is consistent with the objectives, scope, and requirements of the Program. This initial Program eligibility review is separate from the environmental and social screening undertaken through Annex A and is intended to determine whether the proposed project is suitable to proceed for further consideration under the Program.

5.2.1 Housing Project Eligibility

At the initial stage, MOHLR shall review the project proposal and confirm that the proposed project is consistent with its housing priorities, policies, programs, and eligibility requirements. MOHLR shall determine whether the project is acceptable for consideration and whether it falls within the scope of activities intended to be supported under the Program.

The outcome of the initial eligibility review shall be documented in Part A of the Project Environmental and Social Screening Form (Annex A). Where MOHLR determines that the project does not meet the Program's eligibility requirements, the project shall not proceed to environmental and social screening unless the proposal is revised and resubmitted for eligibility review.

Where MOHLR confirms that the project is eligible for further consideration, the project shall proceed to the environmental and social eligibility and screening process described in the Section below. Confirmation of Program eligibility does not constitute environmental or social approval or confirm that the project is eligible for financing. The project must subsequently satisfy the applicable environmental and social eligibility, risk classification, assessment, permitting, consultation, and management requirements established under this ESMF.

5.2.2 Environmental and Social Eligibility / Exclusion Criteria

Following confirmation of Program eligibility by MOHLR, the proposed project shall be screened against the Program-specific exclusion criteria established under this ESMF.

The exclusion screening shall be documented in Part A of Annex A. Annex A includes the applicable IDB exclusion criteria as well as Program-specific criteria relating to protected areas, critical habitat, and involuntary resettlement exceeding the scale identified for the Garden Village sample project.

If an exclusion criterion applies, the project shall be considered ineligible for financing under the Program unless the circumstance giving rise to the exclusion can be eliminated through project redesign and the revised proposal subsequently satisfies the Program's eligibility requirements.

Where an exclusion criterion is identified, MOHLR shall determine whether:

- the proposed activity or circumstance can be eliminated through project redesign;
- the project should be discontinued; or
- the revised proposal should be resubmitted for eligibility review and screening.

A project that appears to meet Category A criteria shall not proceed under the Program. Such cases shall be escalated to MOHLR management and the IDB for review, consistent with the procedures established in Annex A.

5.3 E&S RISK CLASSIFICATION

Projects that satisfy the Program's eligibility and exclusion requirements shall be assigned a preliminary environmental and social risk classification based on the nature, scale, location, and potential environmental and social risks and impacts of the project.

For BH-L1064, individual projects may be classified as Category B or Category C. Category A projects are not eligible under the Program. Table 5.1 establishes the basis for assigning the project-level risk classification. The classification shall be recorded in Part B of Annex A, together with the justification for the assigned category.

Table 5-1 E&S Risk Classification

E&S Risk	Description	Typical Project under the Program	Program Eligibility
Category A	Projects with the potential to cause significant adverse environmental and social impacts that are diverse, irreversible, unprecedented, or that may significantly affect natural resources.	NA	Not Eligible
Category B	Projects with limited, site-specific environmental and social risks and impacts that can be avoided, minimized, mitigated, or managed through appropriate environmental and social measures.	Construction of new single-family or multi-family housing; subdivision infrastructure (roads, drainage and utilities); rehabilitation of public housing; redevelopment of existing residential communities.	Eligible, subject to environmental and social screening and preparation of the required environmental and social instruments.
Category C	Projects expected to have minimal or no adverse environmental and social risks and impacts.	Home repairs and rehabilitations of existing structures (i.e., roof repair or replacement, hurricane-resistant windows, additions) that won't require temporary relocation of families.	Eligible, subject to environmental and social screening and implementation of good environmental and social practices.

Source: 4CR, 2026

The risk classification established during screening is preliminary and shall be reviewed as project information becomes more detailed. Where subsequent assessment identifies risks or impacts inconsistent with the assigned category, MOHLR shall revise the classification and apply the requirements appropriate to the revised classification.

Projects financed under the Program shall have an environmental and social risk profile comparable to, and shall not entail greater potential adverse environmental and social impacts or risks than those identified for the representative sample projects assessed during Program preparation

5.3.1 Project Environmental and Social Screening

Following confirmation of Program and environmental and social eligibility, MOHLR shall undertake project-level environmental and social screening using the Project Environmental and Social Screening Form in Annex A. The screening shall be undertaken at an early stage of project preparation, when sufficient information is available regarding the project's location, type, scale, activities, preliminary design, land requirements, and potential Area of Influence. The purpose of the screening is to identify the project's potential environmental and social risks and impacts, determine the applicable ESPSs and national environmental requirements, identify disaster and climate change risks and vulnerable or disadvantaged groups, and establish the environmental and social assessment and management requirements that will apply to the project. The screening results shall inform the project's preliminary risk classification and the scope of the subsequent ESA, ESMP, or other project-specific instruments, as applicable.

5.3.1.1 Screening Process and Annex A

Annex A is the primary project-level environmental and social screening and decision-support tool under the ESMF. MOHLR shall complete Annex A once sufficient project information is available and before preparation and finalization of the project-specific ESA, ESMP, or other environmental and social instruments. The form shall document the project's eligibility and exclusion screening, preliminary Area of Influence, disaster and climate change risks, demographic and socioeconomic vulnerabilities, applicable ESPSs, national environmental requirements, and preliminary environmental and social risk classification. The completed form shall provide the basis for determining the scope of the project-specific environmental and social assessment and management requirements and shall be retained as part of the project's environmental and social documentation. Where material changes to the project occur during preparation or implementation, Annex A shall be reviewed and updated as necessary.

5.3.1.2 Area of Influence

MOHLR shall identify the project's preliminary Area of Influence (AoI) as part of the screening process, based on the proposed project location, activities, associated facilities, and potential direct and indirect environmental and social risks and impacts. Part C of Annex A shall be used to document the preliminary AoI, including areas directly affected by project activities and areas that may experience indirect or cumulative effects or impacts associated with project-related activities or associated facilities. The preliminary AoI identified during screening shall be reviewed and refined during preparation of the ESA as project design and baseline information become more detailed. The final Area of Influence used for assessment shall be sufficient to capture the environmental and social receptors and risks that could reasonably be affected by the project.

5.3.1.3 Disaster and Climate Change Risk Screening

MOHLR shall undertake an initial disaster and climate change risk screening using Part D of Annex A to identify whether the proposed project may be exposed to natural hazards, climate-related hazards, or other disaster risks that could affect the project or its surrounding communities. The screening shall consider the project's location, proposed activities, physical characteristics, and available hazard and climate information. Where the screening identifies potentially material disaster or climate change risks, a Disaster and Climate Change Risk Assessment (DRA) shall be undertaken in accordance with Annex I. The DRA shall be proportionate to the level and nature of the identified risks and shall be integrated into the project's ESA and/or ESMP. A DRA is therefore not automatically required as a separate

standalone document; where appropriate, its findings and recommended measures may be incorporated directly into the project assessment, design, and management measures.

5.3.1.4 Demographic and Socioeconomic Vulnerability Screening

MOHLR shall use Part E of Annex A to identify demographic and socioeconomic characteristics that may increase the vulnerability of individuals, households, or groups to the project's potential environmental and social risks and impacts. The screening shall consider, as applicable, factors such as poverty, age, disability, gender, household characteristics, tenure status, livelihood dependence, access to services, and other circumstances that may affect a person's ability to participate in project processes or benefit from project activities. The results shall inform the scope and approach of the project's environmental and social assessment and stakeholder engagement and shall be used to determine whether additional measures are required to address vulnerability or ensure meaningful participation. Where relevant, the findings shall also inform the project SEP, gender assessment and SEA/SH measures, resettlement or livelihood restoration planning, community health and safety measures, and other project-specific instruments.

5.3.1.5 ESPS Applicability and Trigger Screening

Following completion of the preliminary eligibility, Area of Influence, disaster and climate change risk, and demographic and socioeconomic vulnerability screening, MOHLR shall determine which ESPSs apply to the proposed project. This determination shall be documented in Part F of the Project Environmental and Social Screening Form (Annex A).

ESPS 1, ESPS 2, and ESPS 10 are always applicable to projects financed under the Program and shall therefore be considered triggered for every project. The remaining ESPSs shall be assessed based on the characteristics, location, activities, potential risks and impacts, and affected stakeholders associated with the proposed project.

The screening questions in Part F of Annex A are intended to identify whether a specific environmental or social issue is relevant to the project. A "Yes" response indicates that the corresponding ESPS is triggered and requires further assessment, management measures, or other action, as specified in Table 5.2. A "No" response indicates that the specific trigger identified in the screening question is not present based on the information available at the time of screening. The screening decision shall be supported by the information available for the project and, where appropriate, by the findings of site visits, preliminary design information, maps, existing studies, consultations, or other available sources.

Table 5.2 provides the trigger logic and corresponding assessment or management response for the environmental and social issues identified in Annex A. It shall be read together with the project-specific screening results recorded in Annex A.

Table 5.2: ESPS Trigger Logic and Required Assessment/Management Response

ESPS / Topic	Trigger identified during screening	Required assessment / management response	ESMF Guidance
ESPS 1 – Assessment and Management of E&S Risks and Impacts	Applicable to all projects	Category B: prepare ESA including ESMP. Category C: prepare Category C ESMP and apply proportionate measures.	Annex B / Annex C

ESPS / Topic	Trigger identified during screening	Required assessment / management response	ESMF Guidance
ESPS 2 – Labor and Working Conditions	Workers, contractors, subcontractors, or primary supply workers involved	Incorporate applicable labor, OHS, worker grievance, and contractor management requirements into ESA/ESMP and/or project-specific measures.	Annex D / Annex E / Annex P
ESPS 3 – Resource Efficiency and Pollution Prevention	Waste, wastewater, emissions, hazardous materials, pollution risks, or significant resource use	Assess risks and incorporate resource efficiency, pollution prevention, waste, and hazardous materials measures into ESA/ESMP and/or project-specific plan.	Annex F.1 / F.2
ESPS 4 – Community Health, Safety and Security	Construction, traffic, hazardous conditions, emergency risks, worker-community interaction, or security risks	Incorporate community health and safety measures; prepare specific traffic or emergency measures where warranted.	Annex G / Annex H.1 / H.2
ESPS 5 – Land Acquisition and Involuntary Resettlement	Land acquisition, physical/economic displacement, temporary relocation, restrictions on land use, or loss of access to assets/livelihoods	Assess displacement and livelihood impacts. Prepare RAP, livelihood restoration measures, or other appropriate measures where required.	Annex J
ESPS 6 – Biodiversity Conservation	Natural habitats, protected areas, wetlands, mangroves, sensitive ecosystems, biodiversity, or ecosystem services potentially affected	Undertake proportionate biodiversity assessment and incorporate avoidance, minimization, mitigation, and management measures.	Annex K
ESPS 7 – Indigenous Peoples	Indigenous Peoples identified within the project Area of Influence	Reassess applicability and undertake the assessment, consultation, and management requirements of ESPS 7, as applicable.	—
ESPS 8 – Cultural Heritage	Known cultural heritage or potential for chance finds from excavation, demolition, construction, or ground disturbance	Incorporate cultural heritage assessment and/or management measures. Apply Chance Finds Procedure where appropriate.	Annex L
ESPS 9 – Gender Equality	Potential differentiated gender impacts, gender-based risks, or SEA/SH risks	Incorporate gender-responsive measures into ESA/ESMP; prepare additional gender or SEA/SH measures where warranted.	Annex M

ESPS / Topic	Trigger identified during screening	Required assessment / management response	ESMF Guidance
ESPS 10 – Stakeholder Engagement and Information Disclosure	Applicable to all projects	Undertake proportionate stakeholder engagement, information disclosure, and grievance management. Prepare project-specific SEP where required.	Annex N
Disaster and Climate Change Risk	Project exposed to potentially material natural hazard or climate risks	Undertake proportionate DRA and incorporate findings into project design, ESA/ESMP, and management measures.	Annex I

Annex A records the project-specific screening decision, while Table 5.2 establishes the corresponding response. A trigger does not automatically require preparation of a separate standalone instrument; the applicable requirements shall be incorporated into the ESA, ESMP, a section or subsection thereof, or a standalone project-specific instrument, as determined in accordance with Section 5.4.

5.4 DETERMINATION OF REQUIRED INSTRUMENTS

The ESPS screening is not intended to determine that every triggered ESPS requires a separate standalone document. The purpose of the screening is to identify the environmental and social issue and determine the appropriate assessment or management response.

For each ESPS identified as triggered, MOHLR shall consult Table 5.2 and the corresponding ESMF Guidance Document to determine the required project-level response. Depending on the nature and significance of the risk or impact, the applicable requirements may be:

- incorporated directly into the ESA;
- incorporated into the ESMP;
- developed as a section or subsection of the ESA/ESMP; or
- prepared as a standalone project-specific instrument where warranted by the nature, scale, complexity, legal requirements, or implementation arrangements.

The ESMF Guidance Documents provide the templates, procedures, frameworks, and technical guidance to support the development and implementation of the applicable project-specific requirements. They are therefore not automatically applicable to every project. Their use is determined through the screening documented in Annex A.

Where a standalone project-specific instrument is prepared, it shall remain consistent with and be referenced by the project ESA and/or ESMP. The ESA and ESMP shall remain the principal project-level documents for consolidating the project's environmental and social risks and impacts, mitigation and management measures, responsibilities, monitoring requirements, and commitments.

5.4.1 Screening Results and Updating

The completed screening in Annex A shall form part of the project's environmental and social documentation and shall be used to establish the scope of the subsequent ESA/ESMP or Category C ESMP, as applicable. The screening results shall also be used to identify the applicable requirements in Table 5.2 and the ESMF Guidance Documents.

The screening shall be reviewed and updated if there is a material change in the project design, location, activities, land requirements, potential Area of Influence, or other circumstances that could change the project's environmental or social risks and impacts.

Where subsequent assessment, stakeholder engagement, site investigations, or project implementation identifies a risk or impact that was not identified during the initial screening, MOHLR shall reassess the applicable ESPSs and update the project's environmental and social assessment and management requirements accordingly. Where necessary, Annex A, the ESA/ESMP, and applicable project-specific instruments shall be revised.

5.4.2 National Environmental Requirements and Permits

Following the environmental and social screening, MOHLR shall identify the national environmental permits, approvals, and other regulatory requirements applicable to the proposed project. These requirements shall be recorded in Part G of Annex A and shall be confirmed and updated as project design and regulatory requirements become more defined.

Depending on the location, nature, scale, and activities of the project, applicable national requirements may include environmental screening and authorization by the Department of Environmental Planning and Protection (DEPP), Environmental Impact Assessment (EIA) or Environmental Management Plan (EMP) requirements, cultural heritage clearance, subdivision or site clearance approvals, road access approvals, utility and wastewater approvals, demolition and building permits, fire safety clearances, and other approvals identified during project preparation.

For projects located within the Grand Bahama Port Area, applicable requirements of the Grand Bahama Port Authority (GBPA) shall also be identified and addressed.

The national environmental assessment and approval process shall be coordinated with the environmental and social assessment process established under this ESMF. Where DEPP or another competent authority requires an EIA, EMP, EBA, technical study, or other assessment, the information generated through that process shall be incorporated into the project ESA, to the extent practicable.

Where a national assessment does not address environmental or social requirements applicable under the IDB ESPF, the ESA and/or ESMP shall provide the necessary additional assessment and management measures. The objective is to establish one coherent project assessment and management process, rather than requiring parallel or duplicative national and IDB assessments.

MOHLR shall ensure that all required national permits and approvals are obtained before the activities to which they relate commence. Applicable permit conditions shall be incorporated into the ESA/ESMP and, where relevant, into bidding documents, contracts, and contractor requirements.

5.4.3 Identification of Required E&S Instruments

The results of the screening process shall be used to identify the environmental and social assessment and management requirements applicable to the project. These requirements shall be recorded in Part H of Annex A.

The ESA and ESMP are the principal project-level environmental and social documents. The other environmental and social instruments identified through screening are not automatically required to be prepared as separate standalone documents. Rather, the screening determines which environmental or social issues require specific assessment or management and the appropriate form of the response.

Where an ESMF Guidance Document is identified as applicable, it shall be used to develop the corresponding project-specific requirements. Depending on the nature, scale, complexity, and significance of the identified risks and impacts, these requirements may:

- be incorporated directly into the ESA;
- be incorporated into the ESMP;
- form a section or subsection of the ESA/ESMP; or
- be prepared as a standalone project-specific instrument where a separate document is warranted.

Where a standalone instrument is prepared, it shall be consistent with and referenced by the ESA and/or ESMP. Its commitments shall also be reflected, as appropriate, in project design, procurement documents, contracts, permits, monitoring requirements, and another applicable project documentation.

This approach is intended to avoid unnecessary duplication while ensuring that all identified environmental and social risks and impacts are adequately assessed and managed.

The completed Annex A shall therefore provide the project-specific record of the screening decisions and required instruments, while the ESA/ESMP and applicable project-specific instruments establish the detailed assessment findings, mitigation measures, management commitments, responsibilities, and monitoring requirements.

5.5 ENVIRONMENTAL & SOCIAL ASSESSMENT AND MANAGEMENT INSTRUMENTS

The environmental and social assessment and management requirements established through Annex A shall be proportionate to the project's environmental and social risk classification and to the nature, scale, location, and significance of its potential risks and impacts.

5.5.1 Category B Projects

For Category B projects, MOHLR shall prepare an Environmental and Social Assessment **(**ESA) that provides the principal integrated assessment of the project's environmental and social risks and impacts.

The ESA shall address, at a minimum:

- Project Description;
- Area of Influence;
- physical, biological, and socioeconomic baseline;
- alternatives analysis, where appropriate;
- environmental and social risk and impact assessment;
- disaster and climate change risk, where triggered;
- Environmental and Social Management Plan;
- stakeholder engagement; and
- other thematic assessments or management requirements identified through Annex A screening.

The ESA shall incorporate applicable requirements of the IDB ESPF, relevant ESPSs, Bahamian legislation and regulatory requirements, and the commitments established under the Program.

The ESMP shall form part of the ESA or be incorporated into it, as appropriate. The ESMP shall consolidate the mitigation and management measures necessary to address the risks and impacts identified through the assessment and shall establish responsibilities, monitoring requirements, implementation arrangements, and reporting requirements.

Where a thematic ESMF annex is triggered, its applicable requirements shall be incorporated into the ESA and/or ESMP unless the nature, scale, complexity, legal requirements, or implementation arrangements warrant preparation of a standalone project-specific instrument.

The minimum content and guidance for preparation of the ESA and ESMP are provided in Annex B.

5.5.2 Category C Projects

Category C projects are expected to have minimal or no adverse environmental and social risks and impacts.

MOHLR shall manage Category C projects through the Category C Environmental and Social Management Plan provided in Annex C, together with any specific measures or permits identified through the Annex A screening process.

The Category C ESMP shall incorporate the applicable mitigation and management measures identified through screening and shall establish proportionate implementation, monitoring, and reporting requirements.

Where an ESMF annex is triggered for a Category C project, the relevant requirements shall normally be incorporated into the Category C ESMP rather than automatically prepared as a separate standalone document.

If subsequent assessment or implementation identifies risks or impacts that are inconsistent with the Category C classification, MOHLR shall re-screen the project and revise its classification and environmental and social management requirements as necessary.

5.6 USE OF ESMF GUIDANCE DOCUMENTS

The ESMF annexes provide standardized frameworks, templates, procedures, and technical guidance to support the preparation and implementation of project-specific environmental and social requirements. They are not automatically applicable to every project.

The need to use each Guidance Document shall be determined through the screening process documented in Annex A. Where a trigger is identified, the relevant Guidance Document shall be consulted to determine the appropriate assessment, management measure, procedure, or project-specific instrument.

The Guidance Documents may therefore be used to develop, as applicable:

- thematic assessments;
- management plans;
- procedures;
- management measures;
- project-specific protocols; or
- standalone project-specific instruments.

The resulting requirements shall be proportionate to the identified risks and impacts.

For example, a project that triggers cultural heritage requirements may require a Chance Finds Procedure, cultural heritage management measures, or both. Similarly, a project with biodiversity risks may require additional biodiversity assessment or management measures. The screening result does not, by itself, mean that every instrument listed in the relevant Annex must be prepared as a separate document.

5.6.1 Integration and Coordination of Project Instruments

All applicable environmental and social requirements shall be developed and implemented as part of an integrated project environmental and social management process.

The ESA and ESMP shall serve as the principal documents for consolidating the project's environmental and social risks, impacts, mitigation measures, commitments, responsibilities, and monitoring requirements.

Where additional project-specific instruments are prepared, they shall be coordinated with the ESA and ESMP and with other applicable project instruments, including the:

- Stakeholder Engagement Plan;
- Grievance Redress Mechanism;
- Contractor Environmental and Social Management Plan;
- Disaster and Climate Risk Assessment and related management measures;
- Resettlement Action Plan or livelihood restoration measures;
- biodiversity management measures;
- cultural heritage procedures;
- gender and SEA/SH measures; and
- Operations and Maintenance requirements.

The purpose of this coordination is to ensure that the project does not contain conflicting or duplicated requirements and that commitments identified during assessment are carried through to implementation.

Where a thematic instrument is incorporated into the ESA/ESMP, the relevant requirements shall be clearly identifiable within those documents. Where a standalone instrument is prepared, the ESA/ESMP shall reference the instrument and summarize its key commitments and linkages.

5.6.2 IDB No Objection

The environmental and social instruments identified through the screening and assessment process shall be submitted to the IDB for review and No-Objection where required under the Program and applicable financing arrangements.

MOHLR shall verify that the required environmental and social assessments, management measures, permits, consultations, and other commitments have been completed before the project proceeds to the applicable procurement, bidding, or implementation stage.

The requirements for IDB review and No-Objection shall be coordinated with national environmental approval requirements. Obtaining a national environmental approval does not replace the requirement to satisfy applicable IDB environmental and social requirements, and

IDB No-Objection does not replace any national permit or approval required under Bahamian law.

5.6.3 Project Cycle implementation

Environmental and social requirements identified during screening and assessment shall be carried through all stages of the project cycle. The purpose of this process is to ensure that environmental and social commitments are incorporated into project design and procurement and remain applicable throughout construction, operation and maintenance, and, where relevant, closure or decommissioning.

The level of environmental and social management required at each stage shall remain proportionate to the project's risks and impacts. The requirements identified through Annex A, the ESA and/or ESMP, and any applicable project-specific instruments shall be translated into clear actions, responsibilities, monitoring requirements, and contractual obligations.

5.6.4 Project Design and Preparation

Environmental and social considerations shall be incorporated as early as practicable into project design. The results of the screening and assessment process shall inform, as applicable:

- site selection and layout;
- design alternatives;
- avoidance and minimization of environmental and social risks;
- climate and disaster resilience measures;
- accessibility and inclusion considerations;
- biodiversity and cultural heritage avoidance measures;
- measures to minimize land acquisition and displacement;
- community health and safety considerations;
- construction methods and sequencing; and
- applicable permits and regulatory requirements.

Where material changes are made to the project during preparation, MOHLR shall determine whether the changes could alter the project's environmental or social risks. Where appropriate, Annex A shall be updated and the need for additional assessment or modification of the environmental and social instruments shall be determined.

5.6.5 Procurement and Contracting

Environmental and social requirements applicable to contractors and subcontractors shall be incorporated into procurement and contracting documentation.

Depending on the nature and risk of the works, bidding and contract documents shall include, as applicable:

- relevant ESA and ESMP requirements;
- environmental and social specifications;
- occupational health and safety requirements;
- labor and working conditions requirements;

- community health and safety requirements;
- traffic and construction management requirements;
- emergency preparedness and response requirements;
- waste and pollution management requirements;
- cultural heritage and chance find procedures;
- biodiversity protection measures;
- stakeholder engagement and community communication requirements; and
- requirements for preparation and implementation of a Contractor Environmental and Social Management Plan (CESMP).

Contractors and subcontractors shall be contractually required to comply with the applicable environmental and social requirements of the Program and to ensure that their workers and subcontractors are informed of and comply with those requirements.

5.6.6 Pre-construction

Before construction begins, MOHLR shall verify that the environmental and social conditions required for commencement have been satisfied.

Depending on the project, this may include confirmation of:

- required national environmental permits and approvals;
- IDB No-Objection, where applicable;
- completion and disclosure of required environmental and social instruments;
- implementation of applicable stakeholder engagement measures;
- establishment of the project grievance mechanism;
- completion of required land acquisition, compensation, or resettlement measures before displacement occurs;
- preparation and approval of the CESMP;
- required worker and community health and safety arrangements;
- emergency preparedness and response arrangements;
- required cultural heritage procedures;
- required biodiversity protection measures; and
- other pre-construction actions identified in the ESA, ESMP, or applicable project-specific instruments.

No construction activity shall commence where doing so would result in non-compliance with applicable national requirements, IDB requirements, or commitments established in the approved environmental and social instruments.

5.6.7 Construction

During construction, the contractor shall implement the applicable environmental and social requirements established in the project ESMP and CESMP and any other applicable project-specific instruments.

MOHLR shall oversee implementation and shall verify that environmental and social measures are being effectively implemented.

Construction-stage management shall include, as applicable:

- environmental and social inspections;
- occupational health and safety management;
- worker grievance management;
- community health and safety measures;
- traffic and access management;
- waste and pollution control;
- erosion and sediment control;
- protection of biodiversity and natural habitats;
- cultural heritage and chance find procedures;
- stakeholder communication;
- management of construction-related nuisances; and
- monitoring and reporting of environmental and social performance.

Where deficiencies or non-compliances are identified, corrective actions shall be established and followed up through the project's monitoring and reporting arrangements.

As a condition of approval of the construction, no pending or unresolved complaints related to environmental and social impacts shall remain outstanding, unless a documented corrective action plan has been agreed with the affected party and is being implemented.

5.6.8 Operations and Maintenance

As a condition of project completion and prior to occupancy, each housing development financed under the Program shall prepare and implement an Operations and Maintenance Plan consistent with the requirements established in this ESMF. Annex O contains an Operations and Maintenance Guidance Document to support preparation and implementation of the required Operations and Maintenance Plan.

Environmental and social requirements shall continue to apply during operation and maintenance to the extent relevant to the nature and risks of the project.

Routine operation and maintenance activities that do not introduce material new risks shall be managed through the established operational procedures and applicable ESMP commitments.

Where planned maintenance, rehabilitation, demolition, expansion, or other operational activities could create new or materially different environmental or social risks, MOHLR shall undertake appropriate screening before the activity begins. This may include updating Annex A, revising the ESMP, or preparing additional project-specific environmental and social measures, as appropriate.

Particular attention shall be given to activities involving:

- construction or demolition;
- hazardous materials or waste;
- occupational health and safety risks;
- community health and safety;

- traffic or access restrictions;
- significant resource use;
- environmental releases; or
- impacts on cultural heritage or biodiversity.

5.6.9 Closure and Decommissioning

Where a project includes closure, demolition, or decommissioning activities, these activities shall be subject to appropriate environmental and social planning.

The applicable requirements shall be determined based on the nature and scale of the proposed activities and may include management of:

- demolition waste and hazardous materials;
- occupational health and safety;
- community health and safety;
- traffic and access;
- contamination or environmental releases;
- cultural heritage;
- biodiversity; and
- restoration or rehabilitation of affected areas.

Where closure or decommissioning was not anticipated during initial project preparation and introduces material new risks, the project shall be re-screened and the applicable environmental and social instruments updated as necessary.

5.7 STAKEHOLDER ENGAGEMENT AND GRIEVANCE REDRESS

Each project financed under the Program shall undertake stakeholder engagement proportionate to its nature, scale, location, and potential environmental and social risks and impacts, in accordance with ESPS 10 and the Program's Stakeholder Engagement Framework (SEF).

The SEF provides the framework and requirements for stakeholder engagement across Program-financed projects. Each project requiring project-specific stakeholder engagement shall prepare a Stakeholder Engagement Plan (SEP) based on the SEF. The project-specific SEP shall be proportionate to the project's potential risks and impacts and shall be incorporated into or referenced by the project ESA/ESMP, as appropriate.

The project-specific SEP shall identify:

- affected communities and interested stakeholders;
- vulnerable or disadvantaged groups requiring additional engagement measures;
- information disclosure requirements;
- consultation and engagement methods;
- timing and frequency of engagement;
- responsibilities for stakeholder engagement;
- mechanisms for receiving and responding to stakeholder feedback; and

- the applicable project grievance mechanism.

Stakeholder engagement shall begin as early as practicable in project development and shall continue throughout the project lifecycle, proportionate to the nature and significance of the project's risks and impacts.

The project ESA/ESMP shall document stakeholder engagement undertaken during project preparation and explain how stakeholder feedback was considered and incorporated into project design and environmental and social management measures.

Detailed procedures and requirements for stakeholder consultation and engagement applicable to Program-financed projects are provided in the SEF in Annex N.

5.8 GRIEVANCE REDRESS MECHANISM

The MOHLR is required to establish and maintain a Program-wide Grievance Redress Mechanism (GRM) to provide project-affected people and other stakeholders accessible, transparent, and timely channels to submit inquiries, concerns, complaints, suggestions, and grievances related to Program activities. Annex N contains a GRM Guidance Document to facilitate the development of the Program GRM.

The objectives of the GRM are to:

- facilitate the prompt receipt, registration, assessment, and resolution of grievances;
- promote dialogue and negotiated solutions where conflicts arise;
- strengthen stakeholder trust and accountability;
- identify recurring issues to support adaptive environmental and social management; and
- Provide feedback on the effectiveness of Project-level environmental and social management measures.

The project-specific SEP shall identify how stakeholders can access the applicable GRM and how grievances will be received, recorded, assessed, responded to and resolved.

The GRM shall not prevent affected people or other stakeholders from accessing judicial or administrative remedies available under Bahamian law.

Grievances involving SEA/SH, GBV, child protection, or other sensitive matters shall be managed through confidential, survivor-centered procedures and shall not be included in publicly accessible grievance records.

5.9 MONITORING, REPORTING AND EVALUATION

Environmental and social monitoring and reporting shall be undertaken throughout Program implementation to verify compliance with the ESMF, project-specific environmental and social instruments, applicable national requirements, and contractual environmental and social obligations.

Monitoring shall also assess the effectiveness of mitigation and management measures, identify emerging or recurring environmental and social issues, and provide information to support corrective actions and adaptive management.

5.9.1 Contractor Monitoring and Reporting

The Contractor shall be responsible for implementing and monitoring the approved CESMP throughout construction. Monitoring activities include routine site inspections, implementation

of mitigation measures, environmental and social monitoring, occupational health and safety inspections, stakeholder engagement activities, grievance management, and incident reporting.

The Contractor must maintain appropriate environmental and social records and submit monthly Environmental and Social Compliance Reports to the MOHLR through the Supervising Engineer. These reports shall summarize implementation of the CESMP, monitoring results, incidents and accidents, grievances received and resolved, corrective actions implemented, and compliance with contractual environmental and social obligations.

5.9.2 MOHLR Monitoring and Reporting

MOHLR is responsible for supervising implementation of environmental and social commitments through periodic site inspections, review of Contractor reports, compliance audits, verification of corrective actions, and consultation with affected stakeholders.

MOHLR shall also evaluate the effectiveness of the environmental and social management measures implemented under the Program. This evaluation shall include, as appropriate:

- assessment of environmental and social performance indicators;
- identification of trends and recurring issues;
- review of compliance with the ESMF and project-specific environmental and social instruments;
- review of the effectiveness of mitigation and management measures;
- review of grievances and stakeholder feedback;
- verification of corrective actions; and
- determination of whether additional mitigation measures or revisions to management plans are required.

The results of the evaluation process shall support adaptive management, enabling MOHLR to improve environmental and social performance throughout Program implementation.

MOHLR shall submit semiannual Environmental and Social Compliance Reports to the IDB, in accordance with the applicable reporting requirements established under the Program and Loan Agreement.

5.9.3 IDB Supervision and Evaluation

The IDB will provide implementation support and oversight in accordance with the Loan Agreement through review of environmental and social documentation, supervision missions, technical meetings, and review of the Program's Environmental and Social Compliance Reports.

The IDB may evaluate the overall effectiveness of the Program's environmental and social management system by reviewing compliance with the ESPF, implementation of agreed environmental and social commitments, monitoring results, corrective actions, and lessons learned. Where necessary, the IDB may recommend additional actions, revisions to environmental and social instruments, or capacity-building measures to strengthen Program implementation.

Table 5-2 Monitoring, Reporting and Evaluation Framework

Level	Monitoring	Reporting	Evaluation
Contractor	Daily inspections, implementation of mitigation measures, environmental and social monitoring	Monthly Environmental and Social Compliance Reports	Internal review of C-ESMP implementation and corrective actions
MOHLR	Site inspections, audits, review of Contractor reports	Semiannual Environmental and Social Compliance Reports to the IDB	Evaluation of Program environmental and social performance, effectiveness of mitigation measures, KPI review, adaptive management
IDB	Supervision missions and technical review	Review of MOHLR reports	Evaluation of compliance with the ESPF and Loan Agreement; recommendations for continual improvement

Source: 4CR, 2026

Table 5-3 Typical Environmental and Social Performance Indicators

Theme	Performance Indicator	Frequency	Responsible Party
Environmental Compliance	Percentage of mitigation measures implemented	Monthly	Contractor
Waste Management	Construction waste properly managed and disposed (%)	Monthly	Contractor
Occupational Health and Safety	Lost-time injuries; near misses; safety inspections completed	Monthly	Contractor
Labor	Worker grievances received and resolved	Monthly	Contractor
Community Health and Safety	Community complaints; traffic incidents	Monthly	Contractor
Stakeholder Engagement	Consultation activities completed	Quarterly	MOHLR
Grievance Redress	Grievances resolved within the established timeframe (%)	Monthly	MOHLR
Resettlement (where applicable)	Compensation and livelihood restoration completed (%)	Quarterly	MOHLR
Environmental Compliance	Number of non-compliance notices issued and closed	Quarterly	MOHLR
Program Performance	Semiannual E&S Compliance Reports submitted on time	Semiannual	MOHLR

Source: 4CR, 2026

6 ANNEXES AND SUPPORTING GUIDANCE

Annex A	Project Environmental and Social Screening Form
Annex B	Guidance for Preparation of Environmental and Social Assessments
Annex C	Category C Projects Environmental and Social Management Plan
Annex D	Labor Management Procedures
Annex E	Occupational Health and Safety Plan
Annex F.1 Annex F.2	Pollution Prevention and Waste Management Plan Erosion and Sediment Control Plan
Annex G	Community Health and Safety Plan
Annex H.1 Annex H.2	Traffic Management Plan Emergency Preparedness and Response Plan
Annex I	Disaster and Climate Change Risk Assessment Guidance
Annex J	Resettlement Framework and Livelihood Restoration Guidance
Annex K	Biodiversity Screening and Management Guidance
Annex L	Chance Finds Procedure
Annex M	Gender Based Violence/ (GBV), Sexual Exploitation and Abuse (SEA) Prevention and Response Measure
Annex N	Stakeholder Engagement Plan and Grievance Redness Mechanism
Annex O	Operations and Maintenance (O&M)
Annex P	Contractor Environmental and Social Management Plan (CESMP)

Annex A

Project Environmental and Social Screening Form

The Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

> *This form shall be completed by MOHLR (or its designated E&S professional) for every project financed under the Program that was not included in the representative sample assessed at Program approval. A separate form shall be completed for each project. Screening shall be undertaken at the early project concept/design stage, once sufficient information is available on the proposed location, type, scale, preliminary design, activities, land requirements, and potential Area of Influence (AoI), and before preparation of the project-specific ESA, ESMP or other project-specific E&S instruments. The screening should also inform, and where practicable precede, detailed national environmental approval applications.*

Acronyms used in this form

Acronym	Meaning	Acronym	Meaning
AoI	Area of Influence	BAP	Biodiversity Action Plan
BMP	Biodiversity Management Plan	CESMP	Contractor Environmental and Social Management Plan
CHSP	Community Health and Safety Plan		
DCRA	Disaster and Climate Risk Assessment	DRMP	Disaster and Climate Risk Management Plan
EIA	Environmental Impact Assessment	EPRP	Emergency Preparedness and Response Plan
ESA	Environmental and Social Assessment	ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan	ESPS	Environmental and Social Performance Standard
GBPA	Grand Bahama Port Authority	GRM	Grievance Redress Mechanism
IDB	Inter-American Development Bank	LMP	Labor Management Procedures

Acronym	Meaning	Acronym	Meaning
MOHLR	Ministry of Housing and Land Reform	OHS	Occupational Health and Safety
RAP	Resettlement Action Plan	SEP	Stakeholder Engagement Plan
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment	TMP	Traffic Management Plan
WSC	Water and Sewerage Corporation		

Project Name: _____

Project Type : _____

Select the category that best describes the project. Where a project combines elements of more than one type (e.g., a grant that finances construction of an auxiliary unit), select all that apply.

☐ Construction or physical works (new housing, rehabilitation of existing structures, supporting infrastructure)

☐ Public Rental home repairs

☐ Private home repairs (construction of auxiliary unit or minor repair works)

☐ Institutional strengthening / technical assistance (no physical works or direct beneficiary payments)

Location (Island / Settlement): _____

Program Component: _____

Estimated Cost (Bahamian dollars): _____

Brief Description: _____

Screened By (Name / Role): _____

Date of Screening: _____

Part A – Preliminary Eligibility and Exclusion Screening

A.1 Housing Program (BH-L1064) Eligibility

Does the project meet MOHLR's housing eligibility criteria? ☐ **Yes** ☐ **No**

A.2 Program Environmental and Social Exclusion List

Confirm the project does NOT involve any of the following. If any box is checked "Yes," the project is NOT ELIGIBLE for financing under the Program and screening shall not proceed.

Exclusion Criterion	Applies?
Production or activities involving forced labor or harmful child labor	☐ Yes ☐ No
Production of or trade in illegal products or substances under national or international law	☐ Yes ☐ No
Trade in wildlife or wildlife products regulated under international conventions	☐ Yes ☐ No
Production of or trade in hazardous materials prohibited by international agreements	☐ Yes ☐ No
Activities involving significant destruction or degradation of critical habitats	☐ Yes ☐ No
Commercial logging operations in primary tropical forests	☐ Yes ☐ No
Production or trade in radioactive materials (except medical/quality-control equipment)	☐ Yes ☐ No
Production or trade in asbestos-containing materials	☐ Yes ☐ No
Production or trade in banned pesticides, herbicides, or other hazardous substances	☐ Yes ☐ No
Activities involving gambling, casinos, or equivalent enterprises	☐ Yes ☐ No
Activities prohibited under ratified international environmental agreements	☐ Yes ☐ No
Project is in a Protected Area	☐ Yes ☐ No
Project is in Critical Habitat	☐ Yes ☐ No
Requires involuntary resettlement exceeding the scale identified in the Garden Village Sample Project	☐ Yes ☐ No

Once the Project environmental and social eligibility have been confirmed, the screening shall establish the geographic area within which the project may result in environmental and social risks and impacts. This Area of Influence (AoI) provides the geographic basis for the subsequent screening of disaster and climate change risks, vulnerable and disadvantaged groups, stakeholder engagement needs, and applicable ESPSs.

Part B – Environmental and Social Risk Classification

Based on the nature, scale, location, and potential environmental and social risks and impacts of the project, assign the Environmental and Social Impact Classification, consistent with Table 5.1 of the ESMF.

Category	Description	Program Eligibility
A	Significant adverse environmental and social impacts that are diverse, irreversible, or unprecedented	NOT ELIGIBLE – do not proceed
B	Limited, site-specific risks and impacts that can be avoided, minimized, mitigated, or managed through standard measures	Eligible, subject to screening and required instruments

Category	Description	Program Eligibility
C	Minimal or no adverse environmental and social risks and impacts	Eligible, subject to screening and good E&S practice

Assigned Category (B or C):

Justification:

> *If the project appears to meet Category A criteria, it is not eligible for financing under the Program. Escalate to MOHLR management and the IDB immediately.*

Part C – Area of Influence

Identify the preliminary Area of Influence (AoI) for the proposed project**.** The AoI is the geographic area within which the project's direct and indirect environmental and social risks and impacts may reasonably occur. The preliminary AoI shall be identified based on the proposed project location, activities, physical footprint, construction and operational requirements, associated facilities, access routes, and other activities or facilities that may reasonably influence environmental or social conditions.

The AoI shall be sufficiently broad to capture potentially affected communities, vulnerable or disadvantaged groups, natural and physical resources, cultural heritage, and other environmental and social receptors that may be affected by the project. The preliminary AoI identified during screening shall be reviewed and refined during preparation of the project ESA as project design, baseline information, and understanding of potential risks and impacts become more detailed.

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Direct Area of Influence (AOI):

Describe the areas expected to experience direct environmental and social risks and impacts from project activities.

Indirect Area of Influence (AII):

Describe areas where indirect, secondary, or associated environmental and social effects may occur as a result of the project.

☐ Attach a map showing the proposed project site and preliminary Area of Influence (required)

The preliminary AoI established above shall be used as the geographic reference for the remainder of the environmental and social screening. In particular, MOHLR shall use the AoI to identify exposure to disaster and climate change hazards, demographic and socioeconomic vulnerabilities, potentially affected communities and other stakeholders, and environmental and social receptors relevant to the applicable ESPSs. The AoI shall be updated during project preparation if additional

information indicates that project-related risks or impacts may extend beyond the area initially identified.

Part D – Disaster and Climate Change Risk Screening

Identify the natural hazards to which the project site is exposed and indicated in ESMF Annex I: Disaster and Climate Change Risk Assessment Guidance.

☐ Hurricane / high wind

☐ Storm surge

☐ Flooding (pluvial / fluvial)

☐ Sea-level rise

☐ Coastal or other erosion

☐ Other (specify):

Disaster/Climate Risk Classification: _____

(Low / Medium / High / Very High – consistent with the IDB Disaster and Climate Change Risk Assessment Methodology)

> *Where the classification is Medium or High, a Disaster and Climate Risk Assessment (DRA) and a Disaster and Climate Risk Management Plan (DRMP) are required, consistent with Annex I.*

Part E – Demographic and Socioeconomic Vulnerability Screening

Identify whether the following groups are present within the project's Area of Influence (AoI) and may be affected, directly or indirectly, by the project.

Group	Present in AoI?	Potentially Affected?
Women-headed households	☐ Yes ☐ No	☐ Yes ☐ No
Older persons	☐ Yes ☐ No	☐ Yes ☐ No
Persons with disabilities	☐ Yes ☐ No	☐ Yes ☐ No
Low-income or informal households	☐ Yes ☐ No	☐ Yes ☐ No
Migrant or minority-language-speaking populations	☐ Yes ☐ No	☐ Yes ☐ No
LGBTIQ+ individuals	☐ Yes ☐ No	☐ Yes ☐ No
Informal or undocumented occupants	☐ Yes ☐ No	☐ Yes ☐ No
Other at-risk or marginalized groups (specify)	☐ Yes ☐ No	☐ Yes ☐ No

Does the project involve land acquisition, restrictions on land use, or physical or economic displacement? ☐ **Yes** ☐ **No** *(If Yes, complete Part G and coordinate with the Resettlement Framework, Annex J)*

Land tenure status of affected parcel(s):

Part F – ESPS Applicability Screening

For each ESPS, answer the screening question and indicate whether it is triggered. ESPS 1, ESPS 2, and ESPS 10 are always applicable and should therefore be considered triggered for every project. For the remaining ESPS, determine whether they are triggered based on the screening questions and, identify the required instrument(s) using the guidance and trigger criteria in Table 5.2 of Section 5 of the ESMF.

ESPS	Screening Question	Triggered?	Required Instrument(s) (if triggered)/ESMF Guidance Document Annex
ESPS 1	Does the project involve activities with potential environmental or social risks and impacts requiring assessment?	☐ Yes	ESA / ESMP Annex B
ESPS 2	Will the project employ direct, contracted, or community workers, or subcontractors?	☐ Yes	LMP (Annex D); OHS Plan (Annex E); CESMP (Annex P)
ESPS 3	Will the project generate erosion, waste, emissions, wastewater, or hazardous materials, or require significant use of natural resources?	☐ Yes ☐ No	Pollution Prevention & Resource Efficiency Plan; Waste Management Plan (Annex F.1); Erosion and Sediment Control Plan (Annex F.2)
ESPS 4	Could the project affect surrounding communities through construction activities, traffic, hazardous conditions, or natural hazards?	☐ Yes ☐ No	CHSP (Annex G); TMP (Annex H.1); EPRP (Annex H.2); DRA/DRMP (if ≥ Medium risk) (Annex I)
ESPS 5	Will the project require land acquisition or restrictions on land use, physical displacement, or economic displacement, either permanently or temporally	☐ Yes ☐ No	If physical displacement: RAP. If economic displacement: LRP. (Annex J) (Complete both if applicable.)
ESPS 6	Is the project located within or near natural habitats, protected areas, wetlands, or other ecologically sensitive areas?	☐ Yes ☐ No	Biodiversity screening within ESA; CHA if potential critical habitat identified; BMP if non-significant or significant impacts identified; BAP if habitat conversion identified or location near/within an internationally recognized

ESPS	Screening Question	Triggered?	Required Instrument(s) (if triggered)/ESMF Guidance Document Annex
			(and unprotected) area (Annex K)
ESPS 8	Could excavation, demolition, or construction activities result in the discovery of previously unidentified cultural heritage resources?	☐ Yes ☐ No	Chance Finds Procedure (Annex L) ;
	Could excavation, demolition, or construction activities affect known cultural heritage resources or sites?	☐ Yes ☐ No	Cultural Heritage Management Measures (Annex L)
ESPS 9	Could the project result in material gender-differentiated impacts, risks, opportunities or barriers affecting women and men, including potentially vulnerable groups?	☐ Yes ☐ No	Gender Assessment within ESA, if needed; where the nature, scale or complexity of the identified gender-differentiated risks warrants it, a standalone Gender Assessment may be prepared (Annex M).
ESPS 10	Are there affected communities or interested parties requiring consultation, disclosure, or access to a grievance mechanism?	☐ Yes	Project SEP; Grievance Mechanism access (all projects) (Annex N)

Note: ESPS7 – Indigenous Peoples is not applicable Program Wide

Part G – Applicable National Permits and Approvals

Indicate which national permits and approvals apply, based on Table 4.2 of the ESMF.

Permit / Approval	Authority	Applicable?
Environmental Screening Determination	DEPP	☐ Yes ☐ No
Environmental Authorization (EIA approval)	DEPP	☐ Yes ☐ No
Cultural Heritage Clearance (if required)	AMMC	☐ Yes ☐ No
Subdivision Permit	Department of Physical Planning	☐ Yes ☐ No
Site Clearance Authorization	DEPP / Forestry	☐ Yes ☐ No
Road Access Approval	Department of Public Works	☐ Yes ☐ No
Water, Wastewater and Utility Servicing Approval	WSC	☐ Yes ☐ No
Waste Disposal Approval	Department of Public Works	☐ Yes ☐ No
Demolition Permit	Department of Public Works	☐ Yes ☐ No

Permit / Approval	Authority	Applicable?
Crown Land Lease / Allocation	Department of Lands and Surveys / MOHLR	☐ Yes ☐ No
Building Permit	Department of Public Works	☐ Yes ☐ No
Electrical Connection Approval	BPL	☐ Yes ☐ No
Fire Safety Clearance	Fire Services Department	☐ Yes ☐ No
Approvals within the Port Area (if in Grand Bahama)	GBPA	☐ Yes ☐ No

Part H – Summary of Required Environmental and Social Instruments

Based on Parts A–G above, identify the project-level E&S requirements. The ESA and ESMP are the primary project-level E&S instruments, and the requirements arising from the other applicable instruments identified below should, wherever appropriate, be developed as part of and incorporated into the ESA and/or ESMP. Where an instrument is not incorporated directly into the ESA or ESMP, its preparation and implementation shall, at a minimum, be coordinated with the ESA and ESMP and its requirements reflected in those instruments. The ESMF Annexes include guidance documents for developing each applicable E&S instrument. A standalone document may be prepared where warranted by the nature, scale, complexity, legal requirements, or implementation arrangements of the project.

☐ Environmental and Social Assessment (ESA)

☐ Environmental and Social Management Plan (ESMP)

☐ Labor Management Procedures (LMP)

☐ Contractor Environmental and Social Management Plan (CESMP)

☐ Occupational Health and Safety (OHS) Plan

☐ Pollution Prevention and Resource Efficiency Plan / Waste Management Plan

☐ Erosion and Sediment Control Plan

☐ Community Health and Safety Plan (CHSP)

☐ Traffic Management Plan (TMP)

☐ Emergency Preparedness and Response Plan (EPRP)

☐ Disaster and Climate Risk Assessment (DCRA) / Disaster and Climate Risk Management Plan (DRMP)

☐ Resettlement Action Plan (RAP)

☐ Livelihood Restoration Plan (LRP)

☐ Critical Habitat Analysis (CHA)

☐ Biodiversity Management Plan (BMP)

☐ Biodiversity Action Plan (BAP)

☐ Chance Finds Procedure (CFP) / Cultural Heritage Management Measures

☐ Gender Assessment / SEA-SH Prevention and Response Measures

☐ Project Stakeholder Engagement Plan (SEP)

☐ Operations and Maintenance (O&M) Plan for all housing developments prior to occupancy

☐ Eligibility and allocation screening checklist (financial assistance / grant projects)

☐ Category C Projects require a proportionate risk assessment and implementation of applicable ESPS 2 labor/OHS measures, stakeholder engagement and consultation, grievance arrangements, and good E&S practice through Annex C and applicable supporting requirements

Part I – Determination and Sign-Off

Overall E&S Risk Classification (B / C):

Is IDB No-Objection required prior to bidding/procurement? ☐ **Yes** ☐ **No**

Target date for completion of required instruments:

Role	Name	Signature	Date
Screened by (MOHLR / Consultant)			
Reviewed by (SEP / ESMF Coordinator, MOHLR)			
Approved by (MOHLR Director General)			

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Annex B

Guidance for Preparation of Environmental and Social Assessments (ESA)

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

1. PURPOSE AND SCOPE

This Annex sets out the minimum structure, content, and quality requirements for the Environmental and Social Assessment (ESA) to be prepared for each project financed under the Program, consistent with ESPS 1 and the other IDB Environmental and Social Performance Standards (ESPS 2–10), as applicable.

This guidance applies to every project classified as Category B during screening (Annex A). Category A projects are not eligible for financing under the Program (Section 5.1.1). Category C projects are not required to prepare a full ESA; they instead follow the generic good-practice measures set out in Annex C, unless MOHLR determines that project-specific circumstances warrant a fuller assessment.

The ESA shall be proportionate to the nature, scale, location, and significance of the environmental and social risks and impacts identified during screening. A project with limited, well-understood, and readily mitigated risks does not require the same level of technical depth as a project located in a sensitive area or involving land acquisition. The screener and preparer shall agree on the appropriate level of effort at the outset, consistent with this proportionality principle.

2. GENERAL REQUIREMENTS

- The ESA shall be prepared by qualified environmental and social specialists with demonstrated experience applying IDB ESPS or comparable Multilateral Development Bank performance standards.
- All baseline data, impact analyses, and conclusions shall be evidence-based and traceable to primary or secondary sources; where primary data collection was not possible, the limitation shall be clearly stated (see Section 8).
- The ESA shall include GIS-based maps and spatial data compatible with standard GIS software, showing the project site and its Area of Influence.
- The ESA shall be prepared in English, in electronic editable format, and in a version suitable for public disclosure consistent with Section 5.1 of the ESMF (technical annexes containing sensitive personal data may be withheld from public versions, consistent with confidentiality requirements).
- The ESA and its findings shall directly inform the corresponding Environmental and Social Management Plan (ESMP), the project's Stakeholder Engagement Plan (SEP), and any other instruments identified through the screening process (Table 5.2).

3. MINIMUM STRUCTURE AND CONTENT OF THE ESA

At minimum, the ESA shall follow the structure set out below. Sections may be combined or expanded proportionate to project complexity, but no section may be omitted without documented justification agreed with MOHLR.

A. EXECUTIVE SUMMARY

A concise, non-technical summary (2–3 pages) including:

- A summary of the project.
- The ESA's objective, including a statement of compliance with the IDB ESPF and ESPS 1–10.
- Key negative and positive environmental and social impacts anticipated during construction, operation, and closure.
- A summary of the principal mitigation, control, monitoring, and prevention measures and their alignment with the ESPS, national regulations, and other applicable requirements.
- Key data gaps or limitations (e.g., access constraints, limited data availability, seasonality, timing).
- Main conclusions and recommendations.

B. INTRODUCTION AND BACKGROUND

- Background and scope of the project, including its justification in relation to national and local development strategies and the Program's objectives.
- A description of the project's relevance for environmental and social development outcomes.
- An overview of the ESA's structure and content.

C. PROJECT DESCRIPTION

- Description of project activities and processes across the design, pre-construction, construction, operation, and closure/post-closure phases (consistent with the phases in Table 5.3).
- Description of the number of people directly and indirectly affected, disaggregated by sex where possible.
- Description of the geographic location and environmental and social context, including associated facilities and third-party infrastructure (e.g., utility connections, access roads, borrow/disposal sites).
- Description of materials, goods, and resources required for construction and operation, including supply-chain considerations where relevant (e.g., aggregate sourcing, imported materials).
- Analysis of project alternatives considered, including site selection, design alternatives, renewable or low-carbon options, greenhouse gas (GHG) reduction considerations, and climate-resilience alternatives.

- Provision of the project information necessary to support the IDB's assessment of alignment with the Paris Agreement, including information on climate risks, resilience measures, greenhouse gas considerations, and relevant low-carbon alternatives, where applicable.
- Maps showing the project site(s) and the direct, indirect, and, where relevant, cumulative Areas of Influence.

D. LEGAL AND INSTITUTIONAL FRAMEWORK

- Applicable national and local environmental and social laws, regulations, and permitting requirements (see Table 4.1 and Table 4.2 of the ESMF for the baseline legal and permitting framework; confirm continued applicability and identify any project-specific requirements).
- Institutional roles and responsibilities for environmental and social management relevant to the project(see Section 4.2).
- Any differences identified between the national/local regulatory framework and the requirements of the ESPF and ESPS for this specific project, beyond those already identified at Program level in Table 4.4.
- Measures proposed to address any project-specific gaps through administrative, regulatory, contractual, or institutional strengthening actions.

E. ENVIRONMENTAL AND SOCIAL BASELINE

This section shall describe baseline conditions in the Direct Area of Influence (AID) and Indirect Area of Influence (AII), building on the preliminary Area of Influence identified in the project's Screening Form (Annex A, Part C).

E.1 *Area of Influence*

- Definition and justification of the AID and AII, including the criteria used to delineate each.

E.2 *Environmental Baseline*

Using primary and secondary data, describe baseline conditions relevant to the project, which may include, as applicable to the Bahamian context:

- Geology, geomorphology, and karst topography.
- Hydrology, groundwater (including freshwater lens vulnerability, where relevant), and surface water.
- Soils and site drainage.
- Climatology, including hurricane season exposure and seasonal variation.
- Air quality and noise.
- Water quality (coastal, marine, or inland as relevant).
- Biodiversity, habitats, and ecosystem services, including coastal and marine ecosystems where the project is near the shoreline.
- Cultural heritage resources (tangible), where identified.
- Natural hazards, consistent with the disaster and climate risk screening in Annex A, Part E, and the methodology in Annex I.

E.3 *Social Baseline*

The social baseline shall build on, and provide greater depth than, the vulnerability screening completed in Annex A, Part F, and shall include:

- Demographic characteristics of the affected and beneficiary population, including age and sex disaggregation.
- Socioeconomic conditions, including formal and informal employment, income sources, and economic activities in the Area of Influence.
- Land use and land tenure, including formal and informal/customary arrangements.
- Sociocultural characteristics, including languages spoken (including Haitian Creole-speaking populations where present), nationalities, and other relevant cultural attributes.
- Presence of vulnerable or minority groups — including women-headed households, older persons, persons with disabilities, migrant or minority-language-speaking populations, LGBTIQ+ individuals, and low-income or informal households — consistent with the groups identified in Annex A, Part F, and an assessment of how project activities may differentially affect them.
- Land tenure and any known archaeological, historical, or cultural/spiritual sites (tangible and intangible) in the Area of Influence, including associated practices and vulnerabilities.
- Use of natural resources and ecosystem services by different groups and communities.
- Identification of key stakeholders in the Area of Influence, cross-referenced to the stakeholder mapping in the Program's Stakeholder Engagement Framework (SEF) and the project's Stakeholder Engagement Plan (SEP).
- Potential social liabilities associated with the project site or its history.
- Assessment of health aspects of the population that may be affected by project activities, particularly for vulnerable groups.
- Analysis of existing consultation, community participation, and grievance mechanisms in the area.
- Access to, and quality of, basic and social services (water, sanitation, energy, schools, health centers, social services, and services for survivors of gender-based violence).
- Current or emerging social conflicts, situations of violence, or insecurity in the project area.
- Any known allegations of human rights violations in the Area of Influence.

E.4 *Spatial Data and Receptors*

- GIS-based maps and spatial datasets compatible with standard GIS software.
- Identification of abiotic, biotic, and human receptors relevant to impact evaluation.

F. IMPACT AND RISK ASSESSMENT

This section shall present the impact and risk assessment organized by ESPS, consistent with ESPS 1–10 and the applicability determined through screening (Annex A, Part G).

F.1 *ESPS 1 – Assessment and Management of Environmental and Social Risks and Impacts*

- Identification of direct, indirect, and cumulative risks and impacts using recognized methodologies.
- Consideration of other existing and planned developments that may contribute to cumulative impacts.
- Identification of disproportionate impacts on vulnerable individuals and groups identified in the social baseline.
- Assessment of potential impacts on worker and community health and safety, including communicable diseases.
- Assessment of project-related GHG emissions and climate change risks.
- Assessment of natural hazards and disaster risks, including criticality and failure scenarios, consistent with Annex I.
- Assessment of potential transboundary impacts, where relevant.
- Assessment of potential impacts related to digital risks (e.g., data misuse, use of AI in service delivery, cyber insecurity), where the project has a digitalization component.
- Assessment of contextual risks, which may include political instability, conflict or violence, discrimination against vulnerable groups, land or resource disputes, curtailed civic space, restrictions on freedom of association, risk of reprisals against stakeholders, governance weaknesses, risk of child or forced labor in the project's supply chain, and any known influx of migrants, refugees, or asylum seekers in the Area of Influence.

F.2 *ESPS 2 – Labor and Working Conditions*

- Assessment of child labor, forced labor, discrimination, and SEA/SH risks associated with the project workforce.
- Assessment of occupational health and safety (OHS) hazards — physical, chemical, biological, and radiological — associated with project activities.
- Assessment of labor risks in primary supply chains, where relevant (e.g., imported construction materials).
- Assessment of workers' freedom of association and collective bargaining, and of potential discrimination based on gender, sexual orientation, gender identity, ethnicity, race, age, migratory status, disability, or other characteristics.

F.3 *ESPS 3 – Resource Efficiency and Pollution Prevention*

- Assessment of energy, water, and material consumption associated with construction and operation.
- Assessment of pollutant emissions to air, water, and soil.
- Assessment of hazardous and non-hazardous waste generation and the use of hazardous materials.

F.4 *ESPS 4 – Community Health, Safety and Security*

- Assessment of impacts on vulnerable groups identified in the social baseline.
- Assessment of risks posed by any security personnel engaged in connection with the project.

- Assessment of potential impacts on ecosystem services that affect community health and safety.
- Assessment of disaster and climate-related risks affecting surrounding communities, cross-referenced to the Disaster and Climate Risk Assessment (Annex I) where the screening classification is Medium risk or higher.
- Assessment of potential digital-risk impacts on the community, where applicable (e.g., data privacy, AI-enabled systems, cybercrime).

F.5 *ESPS 5 – Land Acquisition and Involuntary Resettlement*

- Assessment of displacement risks (physical and/or economic) and land-related impacts.
- Identification of differentiated impacts by gender and on vulnerable populations.
- Identification of feasible alternatives to avoid or minimize displacement, consistent with the mitigation hierarchy.

> *Where physical or economic displacement is confirmed, this section shall be coordinated with the Resettlement Framework (Annex J) and shall trigger preparation of a Resettlement Action Plan (RAP) and/or Livelihood Restoration Plan (LRP), consistent with Table 5.2.*

F.6 *ESPS 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources*

- Assessment of direct, indirect, and cumulative impacts on biodiversity and ecosystem services.
- Identification of natural, modified, and critical habitats within the AID and AII, consistent with the biodiversity screening guidance in Annex K.

F.7 *ESPS 7 – Indigenous Peoples*

- Where Indigenous Peoples, as defined by ESPS 7, are confirmed present within the Area of Influence, a culturally appropriate assessment of potential impacts shall be conducted. This is not currently anticipated for projects in The Bahamas but shall be confirmed on a project basis.

F.8 *ESPS 8 – Cultural Heritage*

- Identification and assessment of risks to tangible and intangible cultural heritage, cross-referenced to the Chance Finds Procedure in Annex L.

F.9 *ESPS 9 – Gender Equality*

- Gender-differentiated impact analysis, including risks related to SEA/SH and trafficking, consistent with Annex M.

F.10 *ESPS 10 – Stakeholder Engagement*

- Identification and analysis of stakeholders, including disadvantaged or vulnerable groups, consistent with the Program's Stakeholder Engagement Framework (SEF).
- Documentation of engagement processes carried out during ESA preparation and how stakeholder feedback was incorporated into project design and mitigation measures.

G. MITIGATION HIERARCHY AND LINKAGE TO THE ESMP

The ESA's findings shall be organized to directly inform the Environmental and Social Management Plan (ESMP), applying the mitigation hierarchy (avoid, minimize, mitigate, and, where unavoidable, compensate) to each significant impact identified in Section F. For each significant impact, the ESA shall identify: the affected receptor, the significance of the impact (pre- and post-mitigation), the proposed mitigation measure, and the ESPS and/or national requirement to which it responds. This linkage table shall carry directly into the ESMP's impact-and-measures summary.

4. DATA QUALITY, GAPS, AND LIMITATIONS

All data, baseline information, and impact analyses shall be evidence-based, traceable, and, where necessary, supported by primary data collected during field visits. Any information gaps or limitations — including restricted site access, limited data availability, seasonality, or time constraints — shall be clearly identified and documented, together with their implications for the confidence of the ESA's conclusions and any recommended follow-up studies.

5. CONSULTATION REQUIREMENTS LINKED TO ESA PREPARATION

Preparation of the ESA shall be informed by, and coordinated with, the consultation activities required under the project's Stakeholder Engagement Plan (SEP), consistent with the Program's Stakeholder Engagement Framework (SEF). At minimum, the fit-for-disclosure draft ESA shall be disclosed and consulted upon prior to finalization, consistent with the minimum consultation requirements in Section 4.2 of the SEF.

6. PREPARER QUALIFICATIONS

The ESA shall be prepared by a multidisciplinary team with demonstrated experience applying the IDB ESPF and ESPS, or comparable Multilateral Development Bank standards, to housing, urban development, or infrastructure projects. At minimum, the team shall include an Environmental Specialist and a Social Specialist with the qualifications described in the governing Terms of Reference for environmental and social instrument preparation under the Program; additional specialists (e.g., Disaster and Climate Risk, Occupational Health and Safety) shall be engaged where the project's risk profile warrants.

7. DISCLOSURE AND APPROVAL

- The final ESA, incorporating consultation feedback, shall be submitted to DEPP (and/or GBPA, where applicable) as part of the national environmental permitting process (Section 5.1.3) and to the IDB as part of the No-Objection process (Section 5.1.4), prior to commencement of any bidding process.

Annex B-1 – ESA Content Compliance Checklist

MOHLR (or its designated reviewer) shall use this checklist to verify completeness of each ESA prior to disclosure and submission for national and IDB approval.

Section	Content Element	Included?
A	Executive Summary	☐ Yes ☐ No
B	Introduction and Background	☐ Yes ☐ No
C	Project description, alternatives analysis, and Paris Agreement alignment determination	☐ Yes ☐ No
C	Maps of project site, AID, AII	☐ Yes ☐ No
D	Legal and institutional framework, including project-specific gaps	☐ Yes ☐ No
E	Environmental baseline	☐ Yes ☐ No
E	Social baseline, including vulnerability analysis	☐ Yes ☐ No
E	GIS maps and spatial data	☐ Yes ☐ No
F	Impact and risk assessment addressing each ESPS triggered in Annex A, Part G	☐ Yes ☐ No
G	Mitigation hierarchy applied and linked to ESMP	☐ Yes ☐ No
–	Data gaps and limitations documented	☐ Yes ☐ No
–	Consultation feedback incorporated (or consultation still pending, noted)	☐ Yes ☐ No
–	Fit-for-disclosure draft published prior to consultation	☐ Yes ☐ No

Role	Name	Signature	Date
Prepared by			
Reviewed by (MOHLR)			

Annex C

Minimum Environmental, Social and Occupational Health and Safety Requirements for Category C In-Home Rehabilitation Works

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

1. PURPOSE AND APPLICABILITY

This Annex establishes the minimum environmental, social, health and safety requirements applicable to Category C projects involving home Repairs/Rehabilitation works within or immediately adjacent to occupied residential properties. Category C projects should not involve temporary relocation of residents to conduct the rehabilitation works. This Annex applies after the project has been screened using Annex A and confirmed as Category C.

The measures presented herein are proportionate to the low environmental and social risk profile of these activities and complement, but do not replace, the requirements of the Environmental and Social Management Framework (ESMF).

2. MINIMUM CONTRACT CLAUSES

MOHLR shall ensure that the following environmental, social, labor, occupational health and safety (ESHS) clauses are incorporated into all bidding documents, contracts, and subcontracts for in-home repairs financed under the Program. Compliance with these requirements shall be a contractual obligation of the contractor and its subcontractors.

- Compliance with the ESMF and applicable ESMP.
- Compliance with all applicable ESMF Annexes.
- Preparation of contractor-specific CESMPs where required.
- Compliance with Labor Management Procedures.
- Compliance with Occupational Health and Safety requirements.
- Worker Code of Conduct signed by all workers.
- Implementation of the Program GRM.
- Immediate reporting of significant incidents.
- Access for MOHLR and IDB inspections and audits.
- Implementation of corrective actions within agreed deadlines.
- Flow-down of ESHS obligations to subcontractors.

3. ROLES AND RESPONSIBILITIES

Role	Responsibilities
MOHLR (PIU)	Confirm Category C classification via Annex A; approve the contractor or work crew engaged for in-home works; make notification letters (Section 5) available in accessible formats; monitor implementation on a sample basis; ensure access to the Program Grievance Mechanism (Annex N) is communicated to homeowners and neighbors. Verify that the proposed works remain within the approved Category C scope throughout implementation.
Contractor / Work Crew	Comply with the In-Home Code of Conduct (Section 4) and OHS requirements (Section 5); deliver notification letters to the homeowner and neighbors prior to commencing work (Section 6); report any condition encountered that exceeds the anticipated scope of minor works (Section 6); maintain basic records of work performed. Maintain the completed compliance checklist and make it available to MOHLR upon request.
Beneficiary	Provide reasonable access to the work area; raise concerns or requests through the contractor or the Program Grievance Mechanism; acknowledge receipt of the notification letter and confirm satisfactory completion of works.

4. IN-HOME CODE OF CONDUCT

Workers entering an occupied home remain subject to the Program Code of Conduct (Annex D-1) in full, including its provisions on non-discrimination, zero tolerance for SEA/SH, and prohibition of child and forced labor. The following additional provisions apply specifically to work carried out inside or immediately around an occupied private home and shall be included in the induction given to any worker assigned to in-home works.

4.1 ACCESS AND PRESENCE IN THE HOME

- Workers shall only enter the home at the times agreed in advance with the homeowner (see Section 5.1) and shall not enter outside those hours without the homeowner's consent.
- Workers shall confine their presence to the areas of the home directly involved in the agreed scope of work and shall not enter other rooms or areas of the property without the homeowner's permission.
- Where practicable, at least two workers should be present for in-home works; a worker should avoid being alone with a child or a household member who is alone and should not be left alone in the home without the homeowner or another household member present, unless otherwise agreed with the homeowner.
- Workers shall not bring visitors, family members, or other non-project personnel onto the property.

4.2 RESPECT FOR THE HOUSEHOLD

- Workers shall treat the homeowner, household members, and neighbors with courtesy and respect at all times, consistent with the principles in Annex D-1.
- Workers shall protect the homeowner's belongings, furnishings, and property from damage, and shall use dust sheets, protective coverings, or similar measures where the nature of the work may create dust, debris, or damage risk.
- Workers shall not use the homeowner's utilities (water, electricity, sanitary facilities), telephone, or other property for personal purposes without permission.
- Workers shall not solicit or accept gifts, favors, or payments from the homeowner beyond what is provided for under the project.
- Photography or video of the interior of the home shall be limited to what is strictly necessary to document the works (e.g., before/after progress photos for the project record) and shall not include household members without their consent.

4.3 CONFIDENTIALITY

- Workers shall respect the privacy of household members and shall not disclose personal information, photographs, or observations regarding the household outside the Project.

4.4 DAILY CONDUCT AND HOUSEKEEPING

- Work areas shall be left in a safe and reasonably tidy condition at the end of each working day, with tools and materials safely stored or removed, particularly where children or older persons are present in the household.

- Any damage to the homeowner's property caused in the course of works shall be reported to the homeowner and to the Contractor's supervisor immediately and shall be remedied as part of the works.
- Workers shall immediately report any concern regarding the safety or welfare of a household member, consistent with the reporting channels described in Annex D-1.

5. OCCUPATIONAL HEALTH AND SAFETY FOR IN-HOME WORKS

The full Occupational Health and Safety Plan (Annex E) applies to Program works generally. The following minimum measures apply specifically to minor repair works carried out in and around occupied homes, where the scale of works does not warrant a full site-specific OHS plan but where hazards specific to occupied residential settings must still be actively managed.

5.1 TRADE-SPECIFIC HAZARDS

- Roofing and working-at-height tasks: use of appropriate fall protection (e.g., harnesses, guardrails, or equivalent), secure ladder placement, and exclusion of household members from the area directly beneath the work zone.
- Electrical repairs: isolation of relevant circuits before work, use of qualified/licensed electricians, and testing before re-energizing.
- General repairs (plumbing, carpentry, minor structural work): use of appropriate hand and power tool safety practices and Personal Protective Equipment (PPE) such as gloves, eye protection, and dust masks as relevant to the task.

5.2 ASBESTOS AND HAZARDOUS MATERIALS AWARENESS

Older houses may contain hazardous materials such as asbestos-containing materials, lead-based paint, mold, or contaminated electrical components. Prior to commencing work that may disturb such materials:

- Workers shall be trained to recognize materials that may indicate the presence of asbestos or lead-based paint (e.g., aging cement roofing sheets, older painted surfaces).
- Where asbestos-containing material, lead-based paint, or another hazardous material may be disturbed by the proposed works, work in the affected area shall stop. The activity shall be re-screened under Annex A before any disturbance, removal, or abatement occurs. Hazardous-material abatement requiring temporary relocation shall not proceed as a Category C activity. It may resume only after the project has been reclassified, the necessary assessment and management instruments have been approved, and safe temporary relocation arrangements have been implemented. Please, see section 7 of this document.
- Workers shall not attempt to remove, cut, sand, or otherwise disturb suspected asbestos-containing material without appropriate training, controls, and, where required, a licensed asbestos removal contractor.

5.3 HOUSEHOLD SAFETY DURING WORKS

- Tools, materials, and equipment shall be kept secure and out of reach of children when not in active use and shall not be left unattended in areas accessible to the household.
- Temporary hazards (e.g., exposed wiring, open floor sections, wet paint or finishes) shall be clearly marked and, where practicable, physically barriered from household access.
- Materials with strong fumes or requiring curing/ventilation time (e.g., certain paints, adhesives, sealants) shall be scheduled and ventilated in a manner that minimizes exposure to household members, particularly children, older persons, and anyone with respiratory sensitivities.
- A basic first aid kit shall be available on-site for the duration of works, and the contractor's emergency contact information shall be provided to the homeowner (Section 5.1).

5.4 ENVIRONMENTAL / SOCIAL PROTECTION

Contractors shall maintain good practices throughout the works to minimize environmental impacts and nuisance to homeowners and neighbouring properties. At a minimum, contractors shall:

- Collect construction waste regularly and dispose of it only at authorized municipal disposal facilities; waste shall not be burned, buried, or dumped on-site.
- Minimize dust and noise through appropriate work practices and limit noisy activities to agreed working hours where practicable.
- Store materials, tools, paints, solvents, fuels, and other hazardous substances safely to prevent spills, leaks, or accidental exposure.
- Protect existing landscaping, utilities, and property features from unnecessary damage and promptly repair any damage caused during the works.
- Prevent construction materials, waste, or wash water from entering stormwater drains, waterways, or neighboring properties.
- Remove all temporary materials, equipment, and waste upon completion of the works and leave the property in a clean, safe, and orderly condition suitable for normal household use.

5.5 CULTURAL HERITAGE

If excavation is required for any auxiliary unit or associated infrastructure, the Contractor shall comply with the Project Chace Finds Procedure (ESMF Annex L) throughout all excavation activities

6. RESIDENT AND NEIGHBOR NOTIFICATION

Prior to commencing in-home rehabilitation works, the Contractor (or MOHLR, where works are managed directly) shall provide written notice to the resident and to immediately adjacent neighbors, consistent with the Program's disclosure principles (ESMF Section 5.1) and the Stakeholder Engagement Framework. Notices shall be delivered at least 7 calendar days before works commence, in a format and language accessible to the recipient (including French or Haitian Creole where relevant), and shall be accompanied by a verbal explanation where literacy or accessibility needs require it.

6.1 TEMPLATE – NOTICE TO HOMEOWNER

[MOHLR / Program Letterhead]

Date: [DATE]

To: [RESIDENT NAME]

Address: [PROPERTY ADDRESS]

Subject: Notice of Home Rehabilitation Works – Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Dear [RESIDENT NAME],

We are writing to confirm that repair works have been approved for your home under the above Program. This letter explains what work will be done, when it will take place, and who to contact with any questions or concerns.

Scope of works: [DESCRIBE WORKS – *e.g.*, roof repair, structural repair, interior repair]

Anticipated start date: [DATE] Anticipated duration: [NUMBER OF DAYS]

Working hours: [*e.g.*, 8:00 AM – 4:00 PM, Monday to Friday]

Contractor / work crew: [CONTRACTOR NAME] On-site contact: [NAME AND PHONE NUMBER]

During the works, you may experience the following temporary conditions:

- Noise from tools and equipment during working hours.
- Dust or debris in and around the work area; workers will use protective coverings and clean the work area daily.
- Presence of workers and delivery of materials to your property during working hours.
- Temporary disruption to [*e.g.*, water, electricity – specify if applicable], which will be communicated to you in advance where possible.

What we ask of you:

- Please allow reasonable access to the work area during the agreed working hours.
- Please let the on-site contact know of any household members with specific health or safety needs (*e.g.*, respiratory conditions) so that the work can be planned accordingly.

If you have any concerns, questions, or complaints at any time — before, during, or after the works — you may contact:

- The Contractor's on-site contact listed above; or

- The Program Grievance Mechanism: [PHONE NUMBER] / [EMAIL] / [OFFICE ADDRESS], free of charge and confidential.

Thank you for your cooperation. We look forward to completing these improvements to your home.

Sincerely,

[NAME AND TITLE]

[MOHLR / PIU]

Acknowledgment of Receipt

I confirm that I have received and understood this notice.

Homeowner signature: _____ Date: _____

6.2 TEMPLATE – NOTICE TO NEIGHBORS

[MOHLR / Program Letterhead]

Date: [DATE]

To: Neighbors of [PROPERTY ADDRESS]

Subject: Notice of Nearby Home Rehabilitation Works – Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Dear Neighbor,

We are writing to let you know that minor repair works will be carried out at [PROPERTY ADDRESS], near your home, under the above Program.

Anticipated start date: [DATE] Anticipated duration: [NUMBER OF DAYS]

Working hours: [e.g., 8:00 AM – 4:00 PM, Monday to Friday]

During this period, you may notice:

- Some noise from tools and equipment during working hours.
- Occasional deliveries of materials and the presence of a small work crew and vehicle in the area.
- Minor, temporary dust in the immediate vicinity of the property, which the work crew will manage and clean up daily.

Works will be limited to the property noted above and to the agreed working hours. If you have any concerns or questions, please contact:

- The Program Grievance Mechanism: [PHONE NUMBER] / [EMAIL] / [OFFICE ADDRESS], free of charge and confidential.

Thank you for your understanding.

Sincerely,

[NAME AND TITLE]

[MOHLR / PIU]

Both templates shall be adapted to reflect the specific works, schedule, and any project-specific conditions. Where a household includes members, who do not read English, the on-site contact shall verbally explain the content of the notice in a language understood by the household, consistent with the Stakeholder Engagement Framework.

7. ESCALATION AND RE-SCREENING TRIGGER

Category C classification reflects an expectation, at the time of screening, that a project's risks and impacts will be minimal. This Annex applies only for as long as that expectation holds. If, once works are underway, actual conditions are found to exceed what was anticipated at screening, the project shall not continue to be managed under this Annex alone. The Contractor shall immediately notify MOHLR, and MOHLR shall re-screen the project using the ESMF Annex A, where any of the following occur:

- Suspected asbestos-containing material, lead-based paint, or other hazardous material is identified (Section 4.2).
- The need for temporary relocation of residents until the area has been abated of asbestos, lead-based paint, or other hazardous materials.
- The condition of the structure is found to require repairs materially beyond the scope of “minor” repairs (e.g., structural work affecting the building's stability, requiring engineering design and a building permit beyond what was anticipated).
- A chance find (suspected cultural heritage material or human remains) is encountered, in which case the Chance Finds Procedure (Annex L) shall apply immediately.
- A safety incident, serious complaint, or allegation (including any SEA/SH allegation) arises in connection with the works.
- Works are found to require physical or economic displacement of any household member, however limited.

Where re-screening results in a revised classification of Category B, the project shall proceed under the full requirements of the ESMF, including preparation of an ESA and ESMP (Annexes B and, as applicable, the thematic management plans), before further works resume in the affected area.

8. MONITORING AND DOCUMENTATION

- The Contractor shall retain, for each project completed under this Annex: a copy of the signed homeowner notification and acknowledgment (Section 5.1); confirmation that neighbor notification was delivered (Section 5.2); and a brief record of works completed, including before/after photographs.
- MOHLR shall confirm satisfactory completion with the homeowner upon completion of works, including confirmation that no damage to the property remains unresolved.
- MOHLR shall periodically verify compliance through field inspections of a representative sample of Category C projects, prioritizing contractors with high work volumes, newly engaged contractors, or projects where complaints have been received.

9. GRIEVANCE MECHANISM FOR IN-HOME REHABILITATION WORKS

Ensure that the GRM is available to those receiving the rehabilitation. Homeowners, household members, neighboring residents, workers, and any other stakeholder affected by the in-home rehabilitation works shall have access to the Program Grievance Mechanism (GM) throughout the implementation of the work.

9.1 GUIDING PRINCIPLES

The Grievance Mechanism shall be:

- Free of charge and accessible to all stakeholders.
- Available before, during, and after completion of the works.
- Confidential, with anonymous complaints accepted where requested.
- Fair, transparent, and free from retaliation.
- Responsive, with complaints addressed promptly according to their nature and urgency.
- Accessible to vulnerable persons through appropriate communication and assistance where required.
- Survivor-centered for complaints involving Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), or Sexual Harassment (SH), which shall be handled confidentially and immediately referred through the Program's established procedures.

9.2 TYPES OF GRIEVANCES

Typical grievances associated with Category C works may include:

- Noise, dust, or temporary access restrictions.
- Damage to private property.
- Contractor conduct or worker behavior.
- Health and safety concerns.
- Temporary interruption of utilities.
- Poor housekeeping or waste management.
- Delays or quality of rehabilitation works.
- Environmental concerns.
- Suggestions or requests for additional information.

9.3 SUBMISSION OF GRIEVANCES

Grievances may be submitted verbally or in writing through any of the following channels:

- Directly to the Contractor's site supervisor or to MOHLR by telephone, email, letter, or through the Program website.
- Through the Program GM using the contact information provided in the homeowner notification letter.
- Anonymously, where the complainant prefers not to disclose their identity.

The Contractor shall make reasonable efforts to resolve minor site-related issues immediately. Complaints that cannot be resolved promptly, or that involve health and safety incidents, environmental damage, allegations of misconduct, or SEA/SH, shall be referred to MOHLR without delay for management under the Program Grievance Mechanism (ESMF Annex N).

9.4 GRIEVANCE RESOLUTION PROCESS

The grievance process consists of the following steps:

1. Receipt and Registration: All grievances shall be recorded by the Contractor or MOHLR upon receipt.

2. Assessment: The grievance shall be reviewed to determine its nature, urgency, and the appropriate responsible party.

3. Resolution: The Contractor shall address routine construction-related grievances where possible. More complex grievances shall be managed by MOHLR through the Program GM.

4. Communication: The complainant shall be informed of the proposed resolution and the actions taken.

5. Closure: A grievance shall be considered closed once the agreed corrective actions have been implemented or the complainant has been informed of the final decision.

Where a complainant is not satisfied with the proposed resolution, the grievance may be escalated to MOHLR for further review in accordance with the Program Grievance Mechanism.

9.5 RESPONSE TIMEFRAMES

Grievance Type	Target Response
Minor site issues (noise, dust, housekeeping)	Within 5 working days
Routine complaints requiring investigation	Within 15 calendar days
Serious health, safety, environmental, or misconduct incidents	Immediate notification to MOHLR and action initiated within 24 hours

These timeframes are indicative and may be adjusted depending on the nature and complexity of the grievance.

9.6 MONITORING AND DOCUMENTATION

The Contractor shall maintain a simple grievance log recording:

- Date received.
- Description of the grievance.
- Action taken.
- Date resolved.
- Current status.

MOHLR shall periodically review grievance records as part of its supervision of Category C projects and include summary information in the Program's environmental and social monitoring reports.

Annex C-1 - Code of Conduct

All workers, supervisors, subcontractors, and other personnel engaged under the Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064) shall comply with this Code of Conduct while performing project-related activities. Failure to comply may result in disciplinary action, removal from the Project, or referral to the appropriate authorities where warranted.

Workers shall:

- Comply with applicable laws, Project requirements, and instructions provided by the Contractor and MOHLR.
- Treat homeowners, household members, neighbors, fellow workers, and the public with courtesy, professionalism, and respect.
- Respect the privacy of households by remaining only in authorized work areas and protecting confidential information.
- Maintain a workplace free from discrimination, harassment, bullying, violence, sexual exploitation and abuse (SEA), and sexual harassment (SH).
- Never engage in child labor, forced labor, human trafficking, or exploitative labor practices.
- Follow all occupational health and safety requirements, including the proper use of personal protective equipment (PPE) and safe work practices.
- Protect the homeowner's property, keep work areas clean and orderly, and manage waste and hazardous materials responsibly.
- Respect agreed working hours and minimize unnecessary disturbance to occupants and neighbors.
- Refrain from using alcohol or illegal drugs while on duty or reporting to work impaired.
- Not solicit or accept gifts, money, or favors from homeowners or beneficiaries.
- Immediately report accidents, unsafe conditions, environmental incidents, grievances, suspected hazardous materials, chance finds, or any allegation of misconduct, including SEA/SH.

Worker Acknowledgement

I acknowledge that I have read and understood this Code of Conduct and agree to comply with its requirements throughout my involvement in the Project. I understand that failure to comply may result in disciplinary action, removal from the Project, or other measures consistent with applicable laws and Project procedures.

Name: _____

Company _____

Signature:_____

Date: _____

Annex C-2 – Compliance Checklist

To be completed by the Contractor (or MOHLR, where works are managed directly) for each project and retained per Section 7.

☐ Homeowner notification letter delivered ≥ 7 days before works commenced, and acknowledgment signed

☐ Neighbor notification letter(s) delivered ≥ 7 days before works commenced

☐ Workers assigned to the project inducted on the In-Home Code of Conduct (Section 3)

☐ Applicable OHS measures in place for the trades involved (Section 4.1)

☐ Workers briefed on hazardous material awareness (Section 4.2)

☐ First aid kit and emergency contact information available on-site

☐ Work area left safe and reasonably tidy at completion; any property damage resolved

☐ Homeowner confirmation of satisfactory completion obtained

☐ Grievance Mechanism contact information provided to homeowner and neighbors

Role	Name	Signature	Date
Completed by (Contractor)			
Verified by (MOHLR)			

Annex D

Labor Management Framework (LMF)

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

1. INTRODUCTION

The purpose of this Labor Management Framework (LMF) is to establish the scope and application of IDB Environmental and Social Performance Standards (ESPS) 2: “Labor and Working Conditions” across all projects financed under the BH-L1064 Program (the Program).

This LMF shall be managed as part of each project's Environmental and Social Management Plan (ESMP). It is a dynamic document and shall be revised and updated as necessary throughout the Program life cycle. The Ministry of Housing and Land Reform (MOHLR), contractors, and subcontractors may develop additional procedures, as needed, to support its implementation for a specific project.

This LMF establishes the guidelines and requirements for labor management, including working conditions and terms of employment, applicable to all workers engaged in Program activities –including MOHLR's own Project Implementation Unit (PIU) staff, contracted workers, subcontractors, and primary supply chain workers. MOHLR is responsible for the overall implementation of this LMF; contractors are responsible for implementation at the worksite level for their own workforce.

This LMF is governed by the principles of equality, opportunity, and fair treatment, ensuring that no employment decisions are made based on personal characteristics outside the inherent requirements of the job, and refraining from discrimination in any aspect of the employment relationship – including recruitment and hiring, remuneration, access to training, job assignment, promotion, dismissal, retirement, and disciplinary practices. Measures shall be taken to prevent and address violence, harassment, intimidation, or exploitation, especially regarding women, persons of diverse sexual orientations and gender identities, persons with disabilities, migrant workers, and other vulnerable people. Under no circumstances shall child or forced labor be permitted.

The Program shall provide workers with a safe and healthy working environment, considering the risks inherent to construction and housing-related activities and the specific risks and vulnerabilities that may affect women, persons of diverse sexual orientations and gender identities, persons with disabilities, migrant workers, and other groups represented within the workforce. Measures shall be implemented to prevent and analyze accidents, injuries, and illnesses, and to minimize, to the extent reasonably practicable, the causes of occupational hazards and risks.

2. LABOR POLICY

The Program shall adopt and implement a Labor and Working Conditions Policy (“Labor Policy”) applicable to all direct workers (including PIU staff), contracted workers, primary supply chain workers.

The Labor Policy shall establish the Program's commitment to:

- Compliance with applicable national labor legislation and the requirements of IDB ESPS 2.
- Operations, Health and Safety (OHS)
- Equal employment opportunities and non-discrimination.
- Equal remuneration for work of equal value.
- Prevention of child labor and forced labor under any circumstances.
- Respect for freedom of association and collective bargaining rights in accordance with national law.
- Fair and transparent terms and conditions of employment.
- Protection against retaliation for reporting grievances, concerns, or violations.
- Respectful treatment of workers and promotion of a workplace free from harassment, discrimination, and violence.

The Labor Policy shall be communicated to all workers and contractors and shall be available in languages and formats accessible to the workforce.

3. OBJECTIVES AND SCOPE

IDB ESPS 2 embodies the following objectives:

- Respect for and protection of the fundamental principles and rights of workers.
- Promoting fair treatment, non-discrimination, and equal opportunities for workers.
- Establishing, maintaining, and improving relations between workers and employers, and ensuring compliance with national legislation on employment and labor.
- Protecting workers, including those in vulnerable situations, such as women, persons of diverse sexual orientations and gender identities, persons with disabilities, children (of working age, in accordance with this ESPS), migrant workers, workers hired by third parties, and workers in the primary supply chain.
- Promoting safe and healthy working conditions and workers' health and preventing the use of child labor and forced labor (as defined by the International Labor Organization - ILO).

Requirements relating to gender equality, stakeholder engagement, and the project grievance mechanism shall be integrated into the implementation of ESPS 2, consistent with the requirements of ESPS 9 and ESPS 10. The use of child labor and forced labor is strictly prohibited under all circumstances.

4. DESCRIPTION OF THE PROGRAM'S WORKFORCE

The workforce is expected to vary based upon the activities required by each project and to be organized as follows:

- **Direct workers:** MOHLR, through the PIU, recruits personnel necessary to implement the Program and oversee project implementation. The PIU is expected to include, at a minimum, qualified Environmental and Social Specialists, technical specialists responsible for assessing beneficiary eligibility against the Program's selection criteria, and other personnel as determined by the Institutional Capacity Assessment. This category also includes individual consultants hired directly by the Program to provide specialized technical, environmental, social, fiduciary, or implementation support.
- **Contracted workers:** the largest proportion of the workforce is expected to be comprised of contracted workers employed by construction contractors and subcontractors engaged to implement civil works under the various Program components, including skilled, semi-skilled, and unskilled labor, as well as supervisory and technical personnel.
- **Primary supply chain workers:** workers employed by suppliers providing materials, equipment, and other essential inputs for Program construction activities. The Program shall conduct due diligence in accordance with the Program-level Supply-Chain Labor Risk Assessment (Annex D-2) to ensure that goods and materials are not produced using child or forced labor and that primary suppliers comply with applicable labor legislation and maintain safe and fair working conditions.

4.1 ASSESSMENT OF LABOR AND WORKING CONDITIONS RISKS

Program projects will require the recruitment, management, and supervision of direct workers, contracted workers, and primary supply chain workers throughout the pre-construction, construction, and operational phases. In accordance with ESPS 2 and applicable labor legislation in The Bahamas, the following risks and associated responsible entities have been identified at Program level; each project's ESA/ESMP shall confirm and, where necessary, supplement this assessment based on project-specific circumstances and needs.

Activity Group	Risk	Responsible Entity
Recruitment and Hiring	Discrimination and unequal opportunity during recruitment and hiring	Contractor / PIU
Recruitment and Hiring	Unethical recruitment practices, charging of recruitment fees, and fraudulent practices	Contractor
Workforce Management	Non-compliance with employment terms and conditions	Contractor / PIU
Workforce Management	Excessive working hours, insufficient rest periods, and non-compliance with leave entitlements	Contractor
Workforce Management	Unequal remuneration and unequal treatment	Contractor

Activity Group	Risk	Responsible Entity
Workforce Management	Workplace harassment, bullying, intimidation, and retaliation	Contractor
Workforce Management	Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH)	Contractor
Workforce Management	Child labor and forced labor	Contractor
Contractor Management	Non-compliance with labor requirements by contractors and subcontractors	PIU / Contractor
Supply Chain Management	Child labor, forced labor, or poor labor conditions within the primary supply chain	PIU / Contractor
Worker Relations	Labor disputes, poor communication, and worker dissatisfaction	Contractor
Worker Relations	Lack of access to an effective worker grievance mechanism or inadequate grievance resolution	PIU / Contractor
Workforce Reduction	Unfair termination practices and inadequate consultation processes	PIU / Contractor

4.2 ASSESSMENT OF OCCUPATIONAL HEALTH AND SAFETY HAZARDS

Program projects will involve a range of activities during the pre-construction, construction, and operational phases that may expose workers to occupational health and safety (OHS) hazards. The type and magnitude of these hazards will vary depending on the nature of the work performed. Potential hazards shall be identified through task-specific risk assessments conducted prior to the commencement of activities and updated as work progresses.

The primary objective of occupational health and safety management is to prevent work-related injuries, illnesses, incidents, and fatalities through the hierarchy of controls – hazard elimination, engineering controls, administrative controls, safe work process, and appropriate use of personal protective equipment (PPE). Contractors shall ensure that workers are adequately trained, competent to perform their assigned tasks, and provided with the tools, equipment, and supervision necessary to work safely.

Specific occupational health and safety hazards and the corresponding prevention, mitigation, emergency preparedness, and incident response measures for civil works are addressed in the Occupational Health and Safety Plan (Annex E), prepared in accordance with applicable Bahamian legislation, ESPS 2, and Good International Industry Practice (GIIP).

5. PREVENTION AND MITIGATION MEASURES

5.1 WORKER FACILITIES AND ADMINISTRATIVE AREAS

- Provide induction and periodic training on workers' rights and responsibilities, the Code of Conduct, non-discrimination, prevention of child labor and forced labor, GBV/SEA/SH, and the Worker Grievance Mechanism.
- Maintain records of training activities and worker participation.
- Ensure workers have access to adequate sanitation facilities, drinking water, and welfare facilities.
- Promote a respectful, inclusive, and harassment-free work environment.
- Ensure workers are informed of available grievance channels and are protected against retaliation when raising concerns.

OHS requirements applicable to worker facilities and administrative areas are addressed in the OHS Plan (Annex E).

5.2 RECRUITMENT, HIRING, AND WORKFORCE MANAGEMENT

- Recruitment and hiring processes shall be conducted in a fair, transparent, and non-discriminatory manner. Employment decisions shall be based exclusively on qualifications, experience, and job requirements, and shall not be influenced by gender, race, ethnic or social origin, Indigenous identity, religion, political opinion, nationality, disability, sexual orientation, gender identity, or any other protected characteristic.
- Each Contractor shall prepare and implement its own Contractor LMF, aligned with this LMF and applicable national legislation, including process for recruitment, workforce management, worker grievance management, disciplinary measures, and actions to prevent discrimination, harassment, GBV, SEA, and SH.
- Contractors shall adopt a gender-sensitive approach to recruitment and shall promote equal employment opportunities for women, persons with disabilities, migrant workers, and other vulnerable groups.
- Contractors shall develop, implement, and communicate a Code of Conduct (Annex D-1) applicable to all workers, establishing a workplace free from discrimination, harassment, intimidation, violence, and retaliation. Child labor and forced labor shall be prohibited under all circumstances.
- Where feasible, Contractors shall seek to maximize local employment, including skilled and unskilled labor, with consideration for workers from the project's area of influence and surrounding communities.
- Personnel with records of serious offenses that may pose a risk to workers or communities – including sexual offenses, sexual harassment, prostitution, human trafficking, and related crimes – shall not be hired, subject to applicable legal requirements.
- Workers shall be informed of their terms of employment, rights, responsibilities, applicable workplace rules, and available grievance mechanisms.
- All workers shall receive induction and periodic training on the Code of Conduct and shall formally acknowledge their understanding of its requirements.

- All workers shall receive a contract or employment agreement, describing pay, scope or work or tasks.

All worker-related information – employment terms, OHS requirements, Codes of Conduct, grievance mechanisms, training materials, and Program communications – shall be prepared and disclosed in a manner that is understandable, accessible, and culturally appropriate to the workforce. Where necessary, materials shall be translated into languages spoken by workers, including Haitian Creole, to ensure all workers can effectively understand their rights, responsibilities, and available procedures and resources.

The minimum content necessary to include in the Code of Conduct is provided in Annex D-1.

5.3 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

- Workers shall be informed during induction training of their rights regarding freedom of association and collective bargaining under national legislation.
- A commitment to non-interference with workers' organizations in employment contracts shall be included in the Code of Conduct and contractor management process

5.4 PREVENTION AND MITIGATION OF GENDER-BASED VIOLENCE, SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT

- All workers shall receive training on the Code of Conduct and expected standards of behavior.
- Awareness activities shall be conducted on GBV, SEA, and SH.
- Confidential reporting channels shall be available to workers.
- Allegations of GBV, SEA, or SH shall be managed confidentially and in accordance with survivor-centered principles.
- Appropriate disciplinary measures shall be applied when violations occur.

Detailed GBV/SEA/SH prevention and response measures are provided in Annex M (Gender Equality, GBV/SEA/SH Measures).

5.5 CONTRACTORS AND SUBCONTRACTORS

- All contractors and subcontractors shall comply with the applicable requirements established in this LMF.
- The Program shall monitor contractor performance through periodic supervision activities.
- Primary suppliers shall be screened, where appropriate, for risks related to child labor, forced labor, and unsafe working conditions in accordance with Annex D-2 (Program-level Supply-Chain Labor Risk Assessment).
- Corrective actions shall be implemented when labor-related non-compliance is identified.

5.6 WORKFORCE REDUCTION AND RETRENCHMENT

Where workforce reduction (retrenchment) becomes necessary, the Program and its Contractors shall apply the following minimum requirements:

- Retrenchment criteria shall be objective, transparent, and non-discriminatory (*e.g.*, based on operational requirements or skills needed), and shall not be based on personal characteristics unrelated to job performance.
- Workers shall receive advance notice of termination, or payment in lieu of notice, consistent with national labor legislation.
- Severance payments and other termination benefits shall be calculated and paid in accordance with national law and the terms of employment.
- Where collective retrenchment affecting a significant number of workers is anticipated, MOHLR shall be notified in advance to assess broader social impacts, in alignment with Annex N (Stakeholder Engagement Plan and Grievance Mechanism) to receive community concerns and prepare a retrenchment plan.

6. CONTRACTOR MANAGEMENT

The Program shall establish a process for the selection, management, monitoring, and evaluation of contractors and subcontractors. The Borrower shall ensure that bidding documents and contracts financed under the Program include appropriate provisions requiring contractors, subcontractors, consultants, service providers, good suppliers, and other relevant third parties in the contracting chain to comply with the applicable requirements of this LMF, the applicable labor legislation, OHS requirements, Code of Conduct, ESPSs and other relevant environmental and social instruments applicable to the Program.

Such contractual provisions include, as applicable, requirements to comply with child labor, forced labor, environmental, labor and social risks, Sexual Exploitation, Abuse and Harassment. These requirements shall be appropriately flowed down through the contracting chain.

The Program shall monitor contractor performance through periodic supervision activities, including document reviews, inspections, worker interviews, and audits, as appropriate. Where non-compliance is identified, corrective actions shall be agreed and monitored until closure. Repeated or serious non-compliance may result in contractual sanctions or termination.

Labor-related risks specific to the primary supply chain, including the risk of child labor, forced labor, or serious safety issues among suppliers of goods and materials, are managed through Annex D-2 (Program-level Supply-Chain Labor Risk Assessment) (, which forms part of this LMF.

7. WORKERS GRIEVANCE MECHANISM

The Program shall establish and maintain a dedicated Workers' Grievance Mechanism (WGM), separate and distinct from the Community Grievance Mechanism, to provide all Program workers, including PIU staff, contracted workers, and, where relevant, primary supply, chain workers, with a transparent, accessible, confidential, and timely process to raise workplace concerns, queries, complaints, suggestions, or grievances and obtain a response and resolution. While certain channels, procedures, or administrative arrangements may be shared wit the community grievances mechanism, the WGM shall remain a distinct mechanism designed specifically to address workplace-related concerns.

The Borrower shall be responsible for providing the WGM for direct workers. For contracted workers, the party responsible for their employment shall provide and appropriate workers' grievance mechanism, the Borrower, directly or through the Executing Agency, shall work with the relevant party to establish an appropriate mechanism and, where feasible and necessary, extend the Program's WGM to contracted workers.

The WGM shall be available to all Program workers and may be used for issues related to labor and working conditions, occupational health and safety, wages and benefits, working hours, accommodation conditions, discrimination, harassment, gender-based violence, freedom of association, collective bargaining, retaliation, termination of employment, and any other employment-related matter.

Use of the WGM should be free of charge and shall not prevent workers from accessing judicial mechanisms available under applicable national legislation.

7.1 RESPONSIBILITIES

- MOHLR shall oversee implementation of the WGM across the Program and verify that each project, including contractors and subcontractors, establishes and maintains grievance process consistent with this LMF. MOHLR shall periodically (at least quarterly) review grievance records, monitor trends, and confirm timely resolution.
- Contractors and subcontractors shall be responsible for receiving, registering, investigating, responding to, and resolving grievances raised by their workers, and shall maintain grievance records and periodically report grievance statistics, significant cases, and unresolved grievances to MOHLR.
- Supervisors and managers shall cooperate with grievance investigators and implement corrective actions when required.

Critical grievances – including allegations related to fatalities, serious occupational incidents, forced labor, child labor, discrimination, retaliation, GBV, SEAH, or freedom of association violations – shall be promptly reported to MOHLR for oversight and monitoring.

7.2 PRINCIPLES OF THE WGM

Each project shall have a feedback/claims management system that includes reception, analysis, monitoring, resolution, and follow-up with the worker who raised the concern. The system shall observe the same principles that govern the Program's general Grievance Mechanism, adapted for the workplace context:

- Mechanisms shall be appropriate to the local context and sociocultural characteristics of the people involved in each project, with special consideration for the most vulnerable groups (young workers, women, persons with disabilities, migrants, among others).

- Complaint management, timelines, and resolution mechanisms shall be widely disseminated to direct workers, contractors, and primary suppliers.
- A record shall be kept of the reception, analysis, and resolution of all claims and conflicts.

7.3 WGM GUIDELINES

- **Accessibility:** the WGM shall be designed in a clear and simple way, understandable to all workers, with no associated cost. Workers may submit grievances verbally or in writing and may request assistance in preparing or submitting grievances.
- **Transparency and predictability:** the process and operation of the WGM shall be transparent, predictable, and readily available. Procedures, responsible persons, timelines, and the resolution process shall be communicated to all workers during inductions and periodic awareness activities.
- **Culturally appropriate:** the WGM shall be designed to consider local customs and social characteristics and shall be implemented in a manner understandable to all workers.
- **Confidentiality:** information related to grievances shall be handled confidentially and shared only with personnel directly involved in resolution.
- **Anonymity:** the WGM shall include an option whereby complaints may be submitted anonymously. Anonymity differs from confidentiality in that, for anonymous grievances, the complainant's personal information is not collected or recorded.
- **Non-retaliatory:** workers raising concerns, participating in investigations, acting as witnesses, or supporting complainants shall be protected from retaliation, intimidation, discrimination, harassment, or any adverse employment action.
- **Fairness and impartiality:** grievances shall be reviewed objectively and without conflicts of interest.
- **Documentation and traceability:** all grievances, actions taken, communications, and resolutions shall be appropriately documented.

7.4 PROTECTION AGAINST RETALIATION

The Program, contractors, and subcontractors shall:

- Communicate the non-retaliation policy to all workers during induction and periodic refresher training.
- Include retaliation as a prohibited behavior under the Code of Conduct.
- Investigate allegations of retaliation promptly and document findings and corrective actions.
- Implement corrective and disciplinary measures for personnel found responsible for retaliatory actions.
- Monitor grievance records periodically to identify potential patterns of retaliation or intimidation.
- Ensure workers involved in grievance investigations do not suffer adverse employment consequences while the grievance remains under review.

7.5 SENSITIVE GRIEVANCES

Sensitive grievances – including allegations of SEAH, GBV, discrimination, workplace harassment, bullying, retaliation, forced labor, child labor, or violations of freedom of association – shall be managed through a confidential, survivor-centered, and safe process that prioritizes the rights, dignity, and well-being of affected individuals.

Sensitive complaints shall be handled only by personnel specifically designated and trained to manage such cases. Information shall be shared strictly on a need-to-know basis. Complainants shall be protected from retaliation, intimidation, or further harm resulting from the submission of a grievance.

Where appropriate and with the informed consent of the survivor, cases involving SEAH or other forms of violence shall be referred to qualified service providers and, where required by law, to the competent authorities. The Worker Grievance Mechanism shall not seek to investigate or adjudicate criminal allegations but shall facilitate confidential reporting, appropriate referrals, and timely implementation of workplace corrective actions where warranted.

7.6 MANAGEMENT OF THE WGM

The Program's WGM shall be managed to ensure it is accessible and operational throughout the Program's lifecycle and communicated at induction and through regular awareness activities.

The grievance process commences with the submission of a complaint, concern, suggestion, or inquiry by any worker, orally or in writing, through the channels established by the contractor or the PIU. Upon receipt, each grievance shall be acknowledged, recorded, assessed, and classified according to its nature and sensitivity. The responsible party shall investigate the grievance, implement appropriate corrective actions, and communicate the proposed resolution to the complainant. The process concludes when the grievance has been resolved to the satisfaction of both parties or when all available resolution procedures have been exhausted. All grievances and resolutions shall be documented and maintained in physical and/or electronic records.

Contractors shall be responsible for implementing the WGM for their own workforce and maintaining grievance records. The PIU shall provide oversight, monitor contractor performance, and ensure grievances are managed consistent with this LMF. Complaints received directly by the PIU, contractors, subcontractors, or other implementing entities shall be consolidated into the Program's grievance register.

7.6.1 Receipt and Registration of Grievances

Workers may submit grievances, complaints, suggestions, or inquiries, openly or anonymously, through:

- Contractor site offices (for contractor and subcontractor personnel);
- Suggestion boxes or complaint registers located at project sites;
- Online grievance forms or other digital channels established by the Program, which shall allow workers to submit grievances anonymously.
- The MOHLR PIU, by telephone, email, in person, or other established communication channels;
- Municipal or other designated government offices, where applicable; and
- Any additional communication channels established during a project's implementation.

All grievances shall be treated confidentially, documented in a grievance register, and assigned a unique identification number for tracking.

7.6.2 Grievance Screening and Assessment

Upon receipt, each grievance shall be acknowledged, registered, and screened to determine: the nature of the grievance; the level of risk and potential impact; whether it is routine or sensitive; the responsible entity for resolution; and the urgency of the required response.

Grievances concerning contractor personnel shall be investigated and addressed by the respective contractor under PIU oversight. Grievances involving PIU personnel or matters within the Ministry's direct responsibility shall be investigated and resolved by the PIU. Where a grievance is found to be outside the scope of the Grievance Mechanism, the complainant shall be informed of the reasons and, where appropriate, referred to the appropriate authority or mechanism.

7.6.3 Investigation and Resolution

The responsible entity shall investigate the grievance, identify appropriate corrective actions, and communicate the proposed resolution to the complainant. Resolutions shall be proportionate to the nature and severity of the grievance and implemented as soon as practicable. The PIU shall oversee implementation of corrective actions and verify grievances have been resolved consistent with this LMF.

Risk Classification	Target Resolution Time
High-risk or urgent grievances	Within 7 calendar days
Medium-risk grievances	Within 15 calendar days
Low-risk grievances	Within 30 calendar days

These timeframes may be adjusted where justified by the complexity of the grievance. The complainant shall be informed whenever additional time is required.

7.6.4 Monitoring, Documentation, and Reporting

The PIU shall maintain a centralized grievance database containing, at minimum: grievance identification number; date received; method of submission; description and classification; responsible entity; investigation undertaken; corrective actions implemented; date the response was communicated; date of closure; and evidence of complainant acceptance or the reason for closure if acceptance was not achieved.

The grievance register shall be updated regularly and used to monitor trends, identify recurring issues, and improve labor management practices.

7.6.5 Post-Closure Monitoring

Where appropriate, particularly for grievances involving corrective actions, the PIU shall monitor implementation following closure to confirm the underlying issue has been effectively resolved. Follow-up monitoring should normally be conducted for a period of up to six months, depending on the nature and significance of the grievance.

8. ROLES AND RESPONSIBILITIES

Actor	Responsibility
MOHLR (PIU)	Overall responsibility for LMF compliance, including direct worker/PIU labor process; approval of the Labor Policy; oversight of contractor labor management and worker grievance mechanisms, including support to contractors where appropriate; and liaison with the IDB.
Contractors / Subcontractors	Implementation of the LMF at the worksite level; provision of compliant employment terms, OHS measures, and worker grievance channels; receipt, handling, investigation, and timely response to worker grievances raised at the project site; and flow-down of requirements to subcontractors and primary suppliers.
Environmental and Social Supervision Specialists	Independent verification of LMF compliance through inspections, document reviews, and worker interviews; tracking of corrective actions.
Gender/SEA-SH Focal Point	Coordination with Annex M on gender-based and SEA/SH-related labor risks.
IDB	Periodic review of LMF implementation as part of Program supervision.

9. MONITORING AND REPORTING

- Periodic labor compliance inspections (at minimum quarterly) of all active worksites, covering contracts, wages, working hours, OHS, and grievance handling.
- Worker grievance log maintained and reviewed by MOHLR and the Supervision team, with case resolution times tracked.
- Labor indicators (workforce numbers, incident rates, grievance statistics, disaggregated by sex where applicable) included in the Program's periodic environmental and social monitoring reports to the IDB.
- Any fatality, serious injury, case of child or forced labor, or substantiated discrimination/harassment case reported to MOHLR and the IDB within 24 hours of detection.

9.1 KEY PERFORMANCE INDICATORS

Topic	Indicator	Unit	Frequency
Workforce	Total workforce (disaggregated by sex)	Number	Quarterly
Workforce	Percentage of female workers	%	Quarterly
Workforce	Percentage of local workers[1] employed	%	Quarterly
Training	Percentage of workers trained on the Code of Conduct, WGM, and GBV/SEA/SH requirements	%	Quarterly
Labor Grievance Mechanism	Total number of labor grievances received	Number	Quarterly
Labor Grievance Mechanism	Percentage of grievances appropriately addressed[2] within the established timeframe	%	Quarterly
Gender and Inclusion	Number of reported cases of discrimination, GBV, SEA/SH, harassment, or retaliation	Number	Quarterly
Contractor Management	Number of labor-related non-compliances identified during inspections or audits	Number	Quarterly

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[1] Local workers: refers to workers who are ordinarily resident in the municipality or local administrative area where the Project activity or worksite is located. The indicator measures the percentage of the total workforce employed under the Program who are local, based on the workers' ordinary placed residence at the time of employment.

[2] A grievance is considered appropriately addressed when it has been reviewed, the complainant has been informed of the outcome and, where applicable, the actions or measures to address the grievance have been identified or initiated

Topic	Indicator	Unit	Frequency
Contractor Management	Percentage of corrective actions closed within the agreed timeframe	%	Quarterly

10. REVIEW AND UPDATE

This LMF shall be reviewed at least annually and updated whenever there is a material change in Program scope, applicable legislation, or following significant labor-related findings or incidents, consistent with its nature as a dynamic, living document throughout the Program life cycle.

11. IMPLEMENTATION SCHEDULE

Activity	Phase	Timing / Frequency
Adoption and disclosure of LMF	Design or concept phase	Prior to mobilization of any worker
Program and Contractor LMF compliance clauses incorporated into bidding documents	Design or concept phase	Prior to tender issuance
Worker induction (Code of Conduct, OHS Plan, WGM)	Pre-construction / ongoing	Prior to each worker's mobilization; refreshers semi-annually
Labor compliance inspections	Construction	At least quarterly, per Section 9
Internal labor audit (incl. supply chain, Annex D-2)	Construction	Annually
LMF review and update	Construction	Annually, or upon material change

12. RELATED ESMF INSTRUMENTS

This LMF is implemented together with the following ESMF annexes, which address specific labor-related risk areas in greater detail:

Annex	Document	ESPS Reference
D-1	Code of Conduct (part of this Annex)	ESPS 2
D-2	Program-Level Supply-Chain Labor Risk Assessment (part of this Annex)	ESPS 2
E	Occupational Health and Safety Plan	ESPS 2
G	Community Health and Safety Plan (CHSP)	ESPS 4
H	Traffic Management Plan and Emergency Preparedness and Response Plan	ESPS 4
M	Gender Equality, GBV/SEA/SH Measures (including SEA/SH Prevention and Response Program and Security Risk considerations)	ESPS 4, 9
N	Stakeholder Engagement Plan and Grievance Mechanism Template	ESPS 10

Annex D-1 – Code of Conduct: Minimum Content

This sub-annex sets out the minimum required content for the Code of Conduct that MOHLR, contractors, and subcontractors must adopt, disseminate, and have signed by all personnel engaged in Program projects, in accordance with ESPS 2 (Labor and Working Conditions), ESPS 4 (Community Health and Safety), and ESPS 9 (Gender Equality), and in direct response to the risks identified in Section 4.1.

The Code of Conduct consists of two complementary, mandatory instruments: (i) a Company/Contractor Code of Conduct, setting out institutional commitments and management measures; and (ii) an Individual Code of Conduct, signed by each worker, supervisor, security personnel, and subcontractor prior to site access.

D-1.1 Company / Contractor Code of Conduct – Minimum Content

Purpose

This Code of Conduct (the "Code") establishes the mandatory standards of behavior applicable to all personnel engaged in a Program project, financed under BH-L1064. The Code gives binding effect to the commitments set out in the project's Environmental and Social Management Plan (ESMP), including the Labor Policy and this guidance for Labor Management Plan (LMF), the Community Health and Safety Plan (CHSP), and applicable gender/SEA-SH measures, and implements the requirements of the IDB Environmental and Social Framework.

Its objectives are to: (i) prevent harm to workers, to project-affected communities, and to the environment; (ii) set clear standards of professional behavior; (iii) prevent SEA/SH, child labor, forced labor, and discrimination; and (iv) establish accessible reporting and grievance channels and consistent disciplinary consequences for non-compliance.

Scope and Applicability

This Code applies to all individuals and entities engaged in or visiting project sites, including:

- MOHLR, as Executing Agency.
- The Project Implementation Unit (PIU).
- Contractors and their employees.
- Subcontractors at all tiers.
- Consultants, including resettlement/census and hazardous materials specialists, where engaged.
- Supervision Consultants.
- Suppliers performing work on site.
- Security personnel, whether privately or publicly engaged.
- Visitors to project sites.

Adherence to this Code is a condition of access to project sites and of continued engagement on the project, and shall be incorporated by reference into all contracts, subcontracts, and terms of engagement.

Legal and Policy Framework

This Code is grounded in:

- The Laws of The Bahamas, including applicable labor, occupational safety, immigration, child protection, and anti-discrimination legislation.
- The IDB Environmental and Social Policy Framework (ESPF) and Environmental and Social Performance Standards (ESPS) 1–10, in particular ESPS 2 (Labor and Working Conditions), ESPS 4 (Community Health, Safety, and Security), and ESPS 9 (Gender Equality).
- The core conventions of the ILO, including on child labor, forced labor, freedom of association, and non-discrimination.
- The project's ESMP and its component instruments, including this LMF, the project's Stakeholder Engagement Plan (SEP), applicable gender/ Sexual Exploitation and Abuse – Sexual Harassment (SEA-SH) measures, and the Community Health and Safety Plan (CHSP).

Where a conflict arises between national law and the requirements of this Code or the ESPF, the more stringent standard shall apply, to the extent permitted by national law.

Principles of Conduct

All persons covered by this Code shall act in accordance with the following principles, which underpin every standard set out herein and shall guide conduct in situations not expressly addressed:

- Integrity
- Respect
- Accountability
- Transparency
- Respect for Human Rights
- Inclusion
- Professionalism
- Respect for Communities
- Environmental Stewardship

Standards of Professional Behavior

- Statement of commitment from senior management to compliance with national labor legislation, IDB ESPS 1–10, and the ESMP, including zero tolerance for SEA/SH.
- Designation of a Code of Conduct Compliance Officer and a SEA/SH Focal Point, with the authority and resources to investigate complaints and impose sanctions.
- Recruitment process that prohibit child labor and forced labor, including age verification and verification of the worker's freedom of movement.
- Mandatory Code of Conduct induction for every worker, subcontractor, and security personnel prior to their first day on site, with a signed attendance record.
- Periodic training (at least quarterly) on SEA/SH prevention, non-discrimination, and occupational health and safety standards.
- A confidential, differentiated grievance mechanism for workers, including a specific, safe channel for SEA/SH complaints, separate from the community-level grievance mechanism.

- A non-retaliation protocol for complaints or reports made in good faith.
- A graduated and proportionate disciplinary regime, including immediate removal from the project in confirmed cases of SEA/SH, violence, or child exploitation, without prejudice to applicable legal action.
- A contractual obligation extending these requirements to all subcontractors, with contract-termination clauses for serious non-compliance.
- A procedure for reporting incidents to the Supervision team and MOHLR within 24 hours of becoming aware of them, for cases of SEA/SH, fatalities, or serious injuries.

D-1.2 Individual Code of Conduct – Minimum Content (signed by each worker)

The individual document, written in plain language and made available in English and other applicable languages (including French, where relevant), shall include at least the following worker commitments:

- **General compliance:** comply with the laws of The Bahamas, Program policies, and site safety instructions; treat all persons – co-workers, supervisors, and community members – with respect, without discrimination based on gender, age, disability, ethnic origin, nationality, migratory status, religion, or sexual orientation.
- **Occupational health and safety:** use required PPE at all times and comply with site safety procedures; not consume alcohol or illegal drugs while performing work duties or while on duty and not report for work or perform work duties while impaired by alcohol or drugs; immediately report any unsafe condition, accident, or near-miss.
- **Prohibition of child labor and forced labor:** not employ, hire, or subcontract anyone below the legal minimum working age; not participate in forced labor, debt bondage, or the retention of other workers' identity documents.
- **Prohibition of child abuse**: not engage in, facilitate, or tolerate any form of abuse, exploitation, neglect, or other harmful conduct toward children, whether in the workplace or in interactions with the community.
- **SEA/SH – zero tolerance:** not engage in SEA/SH under any circumstance, including sexual contact with anyone under 18 years of age under any pretext; the exchange of money, employment, goods, or services for sexual acts (“transactional sex”); non-consensual sexual contact obtained through intimidation, coercion, or abuse of a position of power; and unwanted sexual comments, gestures, or display of sexual material. Workers must immediately report any suspicion or knowledge of SEA/SH by another worker, regardless of position. Violation constitutes grounds for immediate removal from the project and may give rise to criminal liability under Bahamian law.
- **Interaction with the community:** limit interaction with the community to what is strictly necessary for work duties, avoiding asymmetric power relations with individuals in vulnerable situations; respect the practices, property, and culturally significant sites of the affected community and apply the Chance Finds Procedure (Annex L) upon any evidence of archaeological material; not use Program vehicles or equipment for purposes unrelated to work, and comply with the Traffic Management Plan (Annex H).
- **Safe driving behaviors:** when operating Program vehicles or equipment, comply with applicable traffic laws and project traffic management requirements or plan (if applicable); drive safely and defensively, observe applicable speed limits and seat-belt requirements, and not operate vehicles or equipment while impaired by alcohol, illegal

drugs, or any medication that may impair their ability to drive or operate equipment safely.

- **Confidentiality and data protection:** maintain confidentiality regarding the personal information of beneficiaries and workers accessed in the course of duties.
- **Reporting channels and non-retaliation:** be aware of, and able to use, the Grievance Mechanism and the confidential channel specific to SEA/SH cases, with the guarantee that no retaliation will follow a complaint made in good faith.
- **Acknowledgment and signature:** the individual document shall close with an explicit statement that the worker has received the corresponding induction, understood its content in their preferred language, and accepted the disciplinary consequences of non-compliance, with space for signature, date, worker's name, position, employer/subcontractor, and the name of the person who conducted the induction.

Dissemination and Verification Requirements

Requirement	Responsible Party	Means of Verification
Develop a project-specific Code of Conduct	Contractor	Translated versions available on site
Translation into English and other languages as appropriate (plain language)	Contractor	Translated versions available on site
Induction prior to first day of work	Contractor – HSE Officer	Signed induction record, 100% of personnel
Periodic training on SEA/SH and non-discrimination	Contractor – SEA/SH Focal Point	Quarterly attendance lists
Visible display of the Code of Conduct and reporting channels	Contractor	Verification during supervision visits
Inclusion of the Code of Conduct in bidding documents and contracts	MOHLR – Procurement	Contractual clause verified prior to signature
Monitoring	MOHLR	Monthly Environmental and Social supervision report

Annex D-2 – Program-Level Supply-Chain Labor Risk Assessment

> *This assessment shall be conducted at Program level and updated periodically (at least annually, or upon material change in suppliers or scope), rather than repeated for each project, since primary supply categories and associated labor risks are expected to be materially consistent across Program projects.*

D-2.1 Introduction and Purpose

This Supply-Chain Labor Risk Assessment (the “Assessment”) is prepared as part of the Program's environmental and social instruments, in compliance with IDB ESPS 2, which requires Borrowers to identify the Program's primary suppliers and assess the risk of child labor, forced labor, and serious safety issues within their operations.

The Assessment applies to Primary Supply Chain Workers: workers employed or engaged by primary suppliers providing goods and materials essential for the core functions of the Program (*e.g.*, aggregate, cement, steel, fuel, precast elements, and other construction inputs).

Where significant risks of child labor, forced labor, or serious safety issues are identified within the primary supply chain, the Program shall not use, and shall require Contractors to avoid using, goods or materials produced by entities engaging in such practices, and shall apply the due diligence and monitoring measures described in this Assessment.

Given that the Program may incorporate rooftop solar photovoltaic (PV) systems as part of climate-resilient housing design, this Assessment also considers labor risks associated with the global solar PV supply chain, with particular attention to the risk of forced labor associated with polysilicon, wafers, cells, and PV modules sourced from high-risk regions, including the Xinjiang Uyghur Autonomous Region (XUAR) of China, consistent with ESPS 2 and internationally recognized responsible sourcing principles.

D-2.2 Objectives

- Identify the Program's primary suppliers and characterize the labor risks associated with their operations.
- Assess labor risks associated with high-risk global supply chains, including solar photovoltaic components, and establish enhanced due diligence measures where internationally recognized forced labor risks have been identified.
- Establish a risk-based due diligence, monitoring, and corrective action process proportionate to identified risks.
- Define roles, responsibilities, and reporting lines for ongoing supply-chain labor risk management throughout the Program life cycle.

D-2.3 Regulatory and Policy Framework

Instrument	Relevance to Supply-Chain Labor
IDB ESPS 2 – Labor and Working Conditions	Requires identification of primary suppliers and risk assessment for child labor, forced labor, and serious safety issues.
ILO Core Conventions (29, 105, 138, 182, 87, 98, 100, 111)	International reference standards on forced labor, child labor, freedom of association, and non-discrimination; provide internationally recognized due diligence expectations for global supply chains, including high-risk sectors such as solar PV manufacturing.
National Labor Code and Occupational Health and Safety Regulations	Minimum domestic legal requirements applicable to all suppliers operating in-country.
Program Labor Policy	Establishes the Program's zero-tolerance commitment to child and forced labor across the supply chain.

D-2.4 Methodology

The risk assessment follows a four-step, risk-based methodology, applied prior to contract award and periodically thereafter:

- **Mapping:** identify all primary suppliers providing goods/materials critical to core Program functions and where the volume of throughput is such that the Program is a significant customer of the supplier.
- **Screening:** apply a standardized screening questionnaire (Section D-2.7) covering workforce composition, recruitment practices, presence of migrant or seasonal workers, wages and working hours, and prior labor inspection findings.
- **Risk rating:** classify each supplier as Low, Moderate, High, or Severe risk, based on sector profile, country/region risk context, workforce vulnerability, and screening results.
- **Due diligence and monitoring:** apply proportionate due diligence measures based on the supplier's risk level and its relationship to the Program (desk review, site visit, third-party audit). Suppliers shall be monitored according to their risk rating and reassessed annually or whenever there is a material change in the supplier's operations or scope of services.

Suppliers operating in sectors or regions internationally recognized as presenting elevated risks of forced labor (including certain segments of the solar photovoltaic supply chain) shall automatically be classified for enhanced due diligence irrespective of country-level screening results.

Materiality Threshold

A supplier is considered a “primary supplier” subject to this Assessment when it meets either of the following criteria:

- It provides goods or materials essential to the core construction functions of the Program (*e.g.*, aggregate, cement, steel, fuel, precast elements, timber/formwork), regardless of contract value; or
- The value of the Program's purchases from the supplier represents 10% or more of that supplier's annual output, such that the Program is considered a significant customer with corresponding leverage and due-diligence responsibility.

Minor or incidental suppliers (*e.g.*, office supplies, small hardware items not critical to core functions) fall outside the scope of this Assessment.

Solar PV Supply Chain – Enhanced Due Diligence

If a project includes procurement of PV systems for climate-resilient housing, all suppliers of solar modules, cells, wafers, and polysilicon shall be subject to enhanced supply chain due diligence. Contractors shall demonstrate, through verifiable documentation, that PV products supplied to the Program are not manufactured using forced labor and are not sourced from facilities linked to forced labor practices.

At a minimum, suppliers shall provide:

- Full supply chain traceability to the polysilicon production stage;
- Country of origin information for polysilicon, wafers, cells, and modules;
- Evidence of independent third-party supply chain verification, where available;
- Confirmation that manufacturing facilities are not located in, nor source polysilicon from, the XUAR or other regions identified through internationally recognized due diligence as presenting a high risk of forced labor; and
- A declaration of compliance with the Program's Forced Labor Policy.

Where adequate traceability cannot be demonstrated, or where credible evidence indicates a connection with forced labor, such suppliers shall not be eligible to provide PV products to the Program.

D-2.5 Primary Supply Categories

Based on the nature of Program works (construction and demolition) and the regional context, the following primary supply categories have been preliminarily identified as warranting risk screening:

Supply Category	Preliminary Risk Profile	Key Risk Factors
Aggregate / quarry materials	Moderate – High	Possible informal extraction sites; manual labor; potential undocumented or underage workers at small quarries.
Cement, steel, and manufactured construction materials	Low	Typically sourced from formal, regulated industrial suppliers with documented labor practices.
Fuel and lubricants	Low	Regulated, formal distribution sector.

Supply Category	Preliminary Risk Profile	Key Risk Factors
Precast concrete elements / culverts	Low – Moderate	Depends on whether produced by formal manufacturers or informal/local producers.
Timber and formwork materials	Moderate	Risk of informal logging operations and undocumented labor in some sourcing areas.
Solar photovoltaic panels, cells, wafers, and polysilicon	High	Global supply chain exposure to documented forced labor risks, particularly where components originate from or are linked to XUAR, China. Complex multi-tier supply chains may reduce traceability.

D-2.6 Roles and Responsibilities

Actor	Responsibility
MOHLR (PIU)	Overall responsibility for compliance with ESPS 2; review and approval of supplier risk ratings; escalation of severe findings to the IDB.
Contractor	Identification and disclosure of its primary suppliers; completion of screening questionnaires; implementation of corrective actions; contractual flow-down of labor requirements to suppliers.
Environmental and Social Specialists (Supervision)	Verification of screening results; conducting or commissioning site visits and audits; tracking corrective action plans.
IDB	Periodic review of supply-chain risk management as part of Program supervision; No-Objection on remediation plans for severe findings.

D-2.7 Supplier Screening Questionnaire (Summary Topics)

- General supplier and facility information.
- Workforce composition (age, nationality/migration status, gender, contract type).
- Recruitment and contracting practices (use of recruitment agencies/fees, identity document retention).
- Wages, working hours, and overtime practices.
- Occupational health and safety conditions and incident history.
- Freedom of association and grievance channels available to workers.
- Prior labor inspections, audits, or sanctions.

For the solar PV supply chain, additionally:

- Does the supplier manufacture or supply PV modules, cells, wafers, or polysilicon?
- Country of origin of polysilicon, wafers, cells, and modules.
- Complete supply chain traceability documentation.
- Has the supplier conducted forced labor due diligence within its solar supply chain?
- Are any manufacturing facilities or upstream suppliers located in or sourcing materials with documented cases of forced labor or child labor?
- Evidence of third-party verification or equivalent due diligence.

D-2.8 Monitoring and Reporting

- Supplier risk register updated at each procurement cycle and reviewed at least annually.
- Supply-chain labor risk findings included in the Program's periodic environmental and social monitoring reports to the IDB.
- Any severe finding (credible indication of child or forced labor) reported to MOHLR and the IDB within 5 business days of detection.
- Grievances related to supply-chain labor conditions channeled through the Labor Grievance Mechanism (Section 7).

D-2.9 Implementation Schedule

Activity	Phase	Timing / Frequency
Initial supplier mapping and materiality screening	Design or concept phase / Pre-construction	Prior to award of supply contracts
Screening questionnaires and risk rating	Pre-construction	Prior to contract award; before first delivery
Site verification (Moderate/High risk)	Construction	Within 60 days of contract award, then per risk rating (Section D-2.4)
Corrective Action Plan monitoring	Construction	Per CAP timeline; tracked monthly until closure
Supplier re-screening	Construction / Operations	Per frequency defined in Section D-2.4 (semi-annual to biennial, by risk level)
Assessment review and update	Program-level, ongoing	Annually, or upon material change in suppliers or scope

Annex E

Occupational Health and Safety Framework

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

1 INTRODUCTION AND SCOPE

1.1 INTRODUCTION

The Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064) (the Program) is intended to improve housing conditions in The Bahamas through the new housing development or redevelopment of aging, deteriorated, or vacant residential properties and the provision of safe, affordable, and climate-resilient housing. The Program is executed by the Ministry of Housing, Land, and Urban Renewal (MOHLR).

Individual housing development sites (projects) financed under the Program will be identified and confirmed during Program implementation. Projects may involve, among other activities:

- Earth works and typical construction activities for new housing solutions;
- Demolition and redevelopment of occupied or vacant residential structures in advanced states of deterioration;
- Demolition and redevelopment of vacant deteriorated buildings; and
- Rehabilitation of occupied buildings, which following rehabilitation may serve as permanent or temporary housing for residents displaced during redevelopment of other Program sites.

1.2 SCOPE

For the purposes of this Occupational Health and Safety Management Framework (OHSMF), references to “the Project” mean the Program and/or any project financed under it. The OHSMF establishes the occupational health and safety management requirements and procedures to be applied across projects financed under the Program. These requirements will be incorporated, as applicable, into a site-specific Occupational Health and Safety Management Plan (OHSMP) for each project, prepared in accordance with the Project Screening and Preparation of Site-Specific OHSMPs section of this OHSMF.

1.3 OBJECTIVES

The objective of this Occupational Health and Safety Management Framework (OHSMF) is to establish the management framework, responsibilities, procedures, and control measures necessary to eliminate or minimize occupational health and safety risks associated with the demolition, construction, operation and closure phases of Program projects, and to guide the preparation of site-specific Occupational Health and Safety Management Plans (OHSMPs) for each project.

The Plan aims to:

- Protect workers, contractors, subcontractors, and visitors who may be affected by Project activities.
- Prevent occupational injuries, illnesses, fatalities and occupational diseases.
- Identify occupational hazards and implement appropriate risk controls using the Hierarchy of Controls.
- Integrate occupational health and safety considerations into Project planning and daily construction activities.
- Establish minimum occupational health and safety requirements for all contractors and subcontractors.

- Promote a proactive safety culture through leadership, worker participation, consultation, training and continuous improvement.
- Ensure workers receive appropriate induction, task-specific training and supervision.
- Establish procedures for hazard identification, risk assessment, incident reporting, investigation and corrective action.
- Ensure emergency preparedness and response arrangements are available and coordinated with the Emergency Preparedness and Response Plan (EPRP).
- Monitor occupational health and safety performance through inspections, audits and key performance indicators.

It is important to note that this Framework has been developed to ensure compliance with:

- Applicable occupational health and safety legislation and regulatory requirements of The Bahamas.
- The Inter-American Development Bank (IDB) Environmental and Social Policy Framework (ESPF) and Environmental and Social Performance Standards, and
- The World Bank Group's General Environmental, Health and Safety (EHS) Guidelines.

1.4 PROJECT-SPECIFIC OHS

The OHS Plan to be developed following this Framework applies to all Project-related activities throughout the Project lifecycle, including mobilization, pre-construction (including demolition), construction, operation (where applicable), and closure phases. This Plan applies to all Project personnel, contractors, subcontractors, consultants, suppliers working on site, delivery drivers, temporary workers, and visitors undertaking activities in project areas.

The Plan applies to all project areas, including:

- Temporary site offices or admin areas
- Site clearing areas
- Demolition areas
- Excavation works
- Earthworks and grading activities
- Fuel and chemical storage facilities
- Equipment maintenance areas
- Temporary laydown areas
- Temporary access roads
- Temporary material storage areas
- Utility installation corridors
- Drainage and stormwater work areas
- Electrical work areas
- Landscaping areas
- Vehicle parking and washdown areas
- Waste storage areas

- Worker welfare facilities (locker rooms, dining areas, toilets, etc)
- Lodging or accommodation camps (if provided to project workers).
- Transport of project workers (if provided).

This Plan addresses occupational health and safety risks associated with routine and non-routine activities, including work undertaken by subcontractors, including the operation and closure phases of the Project, for which the Plan must be reviewed and updated before commencing such activities and works.

This Plan shall be implemented in conjunction with the following Project management plans, as applicable. It should be noted that guidance and framework documents are included in the other Annexes of the ESMF for their preparation and are listed here for convenience:

- (Annex H.2) Emergency Preparedness and Response Plan
- (Annex F.1) Pollution Prevention and Waste Management Plan
- (Annex F.2) Erosion and Sediment Prevention and Control Management Plan
- (Annex H.1) Traffic Management Plan
- (Annex N) Stakeholder Engagement Plan
- (Annex D) Labor Management Plan, and
- Any applicable Permit to Work Procedures (needed for high-risk activities such as working at heights, working in confined spaces, excavation/trenching, use of cranes, welding, etc).

Where overlap exists, this Plan shall complement, rather than duplicate, the requirements of those documents.

It is important to note that monitoring, inspection, incident reporting and investigation, corrective actions, and periodic review of performance of this Plan will be carried out to ensure continual improvement and compliance with applicable legal requirements and the IDB ESPF and ESPS.

1.5 PROJECT SCREENING AND PREPARATION OF SITE-SPECIFIC OHS

As specific projects under the Program are identified during implementation, the following process shall be applied to ensure occupational health and safety risks are appropriately assessed and managed:

- **Screening:** Prior to mobilization, each project shall be screened to identify its location, scope of works (e.g., demolition, new construction, rehabilitation), site conditions, and associated occupational health and safety hazards, including the potential presence of asbestos-containing materials or other hazardous building materials.
- **OHSMP preparation:** Based on the screening results, a site-specific Occupational Health and Safety Management Plan (OHSMP) shall be prepared for the project, applying the roles and responsibilities, risk management measures, general OHS requirements, monitoring arrangements and reporting requirements established in this Framework, tailored to the project's specific activities and site conditions.
- **Review and approval:** Each project OHSMP shall be reviewed and approved by the MOHLR and/or EHS Manager before mobilization or commencement of works.
- **Update:** The project OHSMP shall be reviewed and updated where the scope of works changes materially, and prior to commencing operation or closure phases, where applicable.

- **Consistency:** Project OHSMPs shall be at least as stringent as this Framework and shall comply with applicable national occupational health and safety legislation, the IDB Environmental and Social Policy Framework (ESPF) and Environmental and Social Performance Standards (ESPS), and the World Bank Group's General EHS Guidelines.

The requirements set out in the remainder of this Framework (including roles and responsibilities, typical activities and risks, management measures, general OHS requirements, documentation, monitoring, key performance indicators, and reporting) constitute the minimum standards to be incorporated into each project-specific OHSMP.

1.6 ROLES AND RESPONSIBILITIES

Occupational health and safety are the responsibility of all Project personnel. The following responsibilities shall apply. It is the MOHLR's responsibility to ensure that this Framework's requirements are implemented consistently across all projects, and that project-specific OHSMPs are prepared, reviewed and approved in accordance with this Framework. Contractors will implement the practices established in each project's OHSMP and establish detailed procedures to apply them on the ground. In order to properly implement this Framework, the involvement of the people listed below is necessary.

Role	Responsibilities
MOHLR	• Review and approve the Plan. • Ensure the availability of resources necessary for the implementation of the Plan. • Review of OHS performance statistics. • Ensure that accidents and/or significant incidents are reported to the IDB and relevant Government authorities where required. • Promote OHS policies, Stop Work Authority and continual improvement.
Contractor's Project Manager	The Project Manager has overall responsibility for ensuring the effective implementation of the Plan, including: • Providing adequate resources (personnel and equipment) to implement the Plan. • Ensuring contractors comply with the Plan and contractual requirements. • Supporting corrective actions following inspections, audits, or incidents. • Ensuring OHS controls are incorporated into construction planning, ensuring that high-risk activities are appropriately planned. • Ensure that OHS policies and Stop Work Authority are applied and reported where unacceptable OHS risks exist. • Approve and ensure closure of corrective actions following accidents and/or significant incidents.
Contractor's EHS Manager	The EHS Manager is responsible for overseeing the implementation, monitoring and reporting, and review and update of the Plan. Specific responsibilities include: • Developing, maintaining, and periodically reviewing the Plan. • Coordinate implementation of the OHSMP with other environmental and

Role	Responsibilities
	social management plans. • Ensure the OHSMP meets and complies with applicable requirements, national regulations, IDB ESPF and ESPS, and EHS General Guidelines, • Review of hazard identification and risk assessments, such as Job Hazard Analysis (JHA) or Job Safety Analysis (JSA). • Monitoring compliance through inspections and audits, particularly monitoring contractor performance. • Participating in investigations of accidents or incidents, identifying appropriate additional control measures, and monitoring implementation of corrective actions. • Coordinate OHS monitoring and investigations of accidents and/or incidents. • Coordinate training, toolbox talks, emergency drills, and investigation of accidents or incidents. • Review and/or recommend corrective actions. • Review and/or prepare monitoring and investigation reports. • Report and liaise with regulatory authorities where required. • Reporting Plan´s performance to project management and IDB.
Construction/Site Manager	The Construction or Site Manager is responsible for implementing the Plan´s management measures in the field by: • Integrate OHS controls into daily construction activities. • Planning site activities to minimize OHS risks. • Supervise implementation of control measures. • Ensuring site personnel are trained in OHS risk prevention, first aid, and emergency response requirements. • Investigating OHS accidents and/or incidents to ensure that corrective actions are implemented. • Ensure high-risk work activities are planned and undertaken safely. • Ensure that required permits, inspections, and controls are in place before commencing high-risk activities. • Ensure adequate OHS supervision is present in work areas, with the required first aid and emergency response equipment.
OHS Officers	• Supervise and inspect work areas to ensure compliance with OHSMP. • Conducting daily pre-start inspections of work areas and daily toolbox talks when required. Carry out OHS inductions to all project workers, contractors, subcontractors, and visitors. • Exercise the Stop Work Authority where unacceptable OHS risks exist. Report these events to the Construction Manager, Project Manager, and EHS Manager. • Keep track of planned high-risk activities and supervise them. • Carry out and/or review hazard identification and risk assessments (i.e.

Role	Responsibilities
	JHA or JSA), particularly for high-risk activities. • Inspect work areas and verify that required OHS permits and controls are in place before commencing high-risk activities. • Ensure that first aid and emergency response equipment is present, particularly for high-risk work activities. • Carry out OHS risk prevention training, first aid, and emergency response. Keep track of personnel training, keep documentary evidence, and report training statistics to the EHS manager. • Verify in the field that workers follow safe work procedures, particularly focusing on contractors and subcontractors. • Ensure PPE is provided and correctly used. • Document all identified or reported unsafe conditions, hazards, incidents, and/or accidents. Keep track and report these to EHS Manager. • Participating in investigations of accidents or incidents, keeping OHS statistics and preparing relevant reports, and implementing OHS corrective actions. • Document follow up care for injuries and ensure a return to work assessment is completed before workers return to work
Project workers	All project workers shall: • Comply with OHS plan, procedures, and instructions. • Participate in carrying out JHA or JSA development, and understand the required OHS controls, particularly for high-risk activities. • Exercise Stop Work Authority where an imminent danger exists. • Correctly wear all PPE. • Actively participate in required OHS awareness training and toolbox talks. • Immediately report unsafe conditions, hazards, incidents, and/or accidents. • Comply with the Code of Conduct of the Project.
Subcontractors	Subcontractors are responsible for: • Complying with the requirements of this Plan. • Implement OHS controls and immediately report unsafe conditions, hazards, incidents, and/or accidents. • Training all personnel in relevant OHS aspects. • Developing and implementing task specific OHS procedures, where required. • Present documentary evidence of implementation of OHS management measures. • Prior to commencing any activity, carry out JHA or JSA and implement appropriate control measures in accordance with the Hierarchy of Controls. Particular focus should be placed on high-risk activities.
Visitors	• Comply with site induction requirements

Role	Responsibilities
	• Remain under escort where required • Wear the minimum required PPE • Follow OHS and emergency response instructions provided by authorized personnel.

Source: 4CR, 2026

1.7 ACTIVITIES

The following Project activities may present occupational health and safety risks requiring implementation of the OHSMP.

Activity	Potential Source of OHS risks
Site establishment	Vehicle movements, manual handling, utility strikes, slips, trips and falls
Demolition of existing houses	Structural collapse, falling debris, dust, noise, asbestos-containing materials, hazardous materials, mobile plant interactions
Demolition - Hazardous material removal (where required)	Exposure to asbestos-containing materials, lead-based paint, hazardous dusts and hazardous waste
Site clearing and earthworks	Mobile plant, heat stress, dust, noise, manual handling, excavation collapse
Excavation and trenching	Trench collapse, engulfment, underground utility strikes, confined spaces (where applicable)
Foundation and concrete works	Manual handling, concrete burns, slips, mobile equipment, falling objects
Structural works	Falls from height, falling objects, scaffolding failure, lifting operations
Roofing works	Falls from height, weather exposure, falling materials
Electrical installation	Electric shock, arc flash, fire, energized equipment
Plumbing and utility installation	Excavations, manual handling, confined spaces (where applicable), biological hazards
Welding, cutting and grinding	Fire, burns, hot work, eye injuries, fumes
Crane and lifting operations	Dropped loads, equipment failure, struck-by incidents
Equipment operation and maintenance	Vehicle collisions, entanglement, fuel spills, mechanical failure
Fuel storage and refueling	Fire, explosion, chemical exposure, environmental contamination

Activity	Potential Source of OHS risks
Material storage and handling	Manual handling injuries, unstable stockpiles, falling materials
Waste handling	Cuts, biological hazards, hazardous waste exposure, manual handling
Hazardous material and waste	Exposure to materials and hazardous waste
Worker welfare facilities, lodging facilities and worker transport	Heat stress, food hygiene, infectious diseases, sanitation, overcrowding, sexual harassment, and accidents of vehicles transporting project personnel.
Landscaping and reinstatement	Heat stress, equipment operation, manual handling, chemical exposure (if herbicides or pesticides are used)
General site activities	Slips, trips and falls, fatigue, ergonomic hazards, adverse weather, interaction with the public

Source: 4CR, 2026

1.7.1 High-Risk Activities

The high-risk activities requiring specific risk assessments and a Permit to Work (where applicable) include:

- Demolition of existing structures.
- Removal of asbestos-containing materials or
- Removal of hazardous materials or waste
- Excavation and trenching.
- Working at height.
- Crane and lifting operations.
- Hot works (welding, cutting and grinding).
- Electrical works involving energized systems.
- Confined space entry (where applicable).
- Work adjacent to live traffic.
- Fuel transfer and refuelling operations.

All project workers, contractors and subcontractors shall ensure that these activities are planned, supervised and monitored by competent persons, and that work shall not commence until all required controls, permits and emergency response controls and arrangements are in place.

1.8 RISK, IMPACTS AND MANAGEMENT MEASURES

The following sections describe the key impacts and management measures associated with Project's activities.

1.8.1 Key risks and Impacts

The following table identifies the principal occupational health and safety risks associated with the demolition, construction, operation and closure phases of the Project.

- Demolition of existing buildings presents risks from structural instability, falling debris, dust generation, uncontrolled collapse, and interaction with heavy equipment. These activities require careful planning, competent supervision and controlled exclusion zones.
- Existing buildings may contain asbestos-containing materials, lead-based paint, mercury-containing lamps, refrigerants or other hazardous materials. Disturbance during demolition may expose workers and nearby communities to hazardous substances if not properly identified and managed.
- Roofing, scaffolding, ladders, elevated work platforms and structural works expose workers to falls that may result in serious injury or fatality.
- Materials, tools, equipment or structural elements may fall from elevated work areas, posing risks to workers below and other persons entering construction areas.
- Excavations may collapse due to unstable soils, water ingress or inadequate support systems, resulting in worker entrapment, serious injury or fatality.
- Construction equipment including excavators, loaders, cranes, trucks and forklifts may strike workers or other vehicles due to poor visibility, reversing movements or inadequate traffic management.
- Increased construction traffic may expose workers to collisions involving heavy vehicles, public traffic and pedestrians both within and outside the construction site.
- Crane operations and mechanical lifting present risks from dropped loads, equipment failure, overloading and contact with structures or utilities.
- Temporary electrical installations, portable tools, energized systems and damaged cables may result in electric shock, burns, arc flash or fire.
- Welding, cutting and grinding generate sparks, heat, fumes and molten metal that may cause burns, fires or explosions if not properly controlled.
- Lifting, carrying, repetitive movements and awkward postures may result in musculoskeletal disorders and soft tissue injuries.
- Power tools, generators and heavy machinery may expose workers to excessive noise and vibration, potentially resulting in hearing loss or other health effects.
- Demolition, earthworks, concrete cutting and material handling may generate respirable dust, including silica-containing dust, affecting worker health if inhaled.
- Expose workers to high temperatures, humidity and solar radiation, increasing the risk of heat exhaustion, heat stroke, dehydration and sun-related illnesses.
- Fuels, oils, lubricants, solvents, paints, concrete additives and cleaning chemicals may present health risks through inhalation, ingestion or skin contact.
- Storage and use of flammable materials, fuel handling, hot works and electrical faults may result in fires or explosions affecting workers and Project assets.
- Poor storage of materials, accumulated waste, trailing cables and uneven surfaces may create slip, trip and fall hazards and obstruct emergency access.

- Inadequate sanitation, drinking water, rest facilities or welfare arrangements, including lodging or accommodation, and transport provided to workers, which may adversely affect workers' physical and mental health conditions. Potentially caused by bad sleeping, unsafe spaces or potential sexual harassment, and inadequate maintenance or operation of vehicles transporting project personnel
- Extended working hours, physically demanding activities and inadequate rest may impair judgement and increase the likelihood of incidents.
- Workers may be exposed to communicable diseases through poor hygiene, contaminated food or water, or contact with infected individuals, affecting workforce health and productivity.

1.8.2 Management measures

The Project shall adopt and implement the following best practices to address the risks and impacts described above.

Impact or Risk	Mitigation / Management
Demolition activities	• For demolition activities, prepare Hazard Identification Risk Assessment (HIRA), Safe Work Method Statements (SWMS) and site-specific Job Hazard Analysis (JHA) prior to commencing work. • Complete a Pre-Demolition Hazardous Materials Survey before demolition begins. • Implement management measures from the Pre-Demolition Hazardous Materials Survey results. • Establish exclusion zones with controlled access. • Disconnect utilities before demolition. • Sequence demolition to maintain structural stability. • Wear all required PPE at all times. • Implement dust control measures. • Use competent and trained operators for demolition equipment.
	• Continuously supervise demolition activities and stop work if unsafe conditions develop.
Asbestos-containing materials (ACM) and hazardous building materials	• Implement the requirements of the Waste and Hazardous Materials Management Plan. • Complete a Hazardous Materials Survey prior to demolition. • Remove ACM only by qualified and competent personnel using approved procedures. • Establish exclusion zones and appropriate warning signage.

Impact or Risk	Mitigation / Management
	• Provide suitable respiratory protection and disposable protective clothing where required. • Package, label, transport and dispose of ACM in accordance with applicable legislation and Good International Industry Practices (GIIP). • Immediately stop work if suspect ACM is discovered unexpectedly and implement the required management measures.
Falls from height	• Eliminate work at height where reasonably practicable. • Use engineered working platforms and guardrails. • Inspect scaffolding before use and at regular intervals. • Use certified fall arrest systems where collective protection cannot be provided. • Secure ladders and restrict their use to short-duration tasks. • Implement a Permit to Work for high-risk work at height. • Provide rescue procedures for workers working at height.
Falling objects	• Install toe boards, debris netting and overhead protection where required. • Establish exclusion zones beneath elevated work areas. • Always secure tools and materials while working at heights. • Prohibit work directly beneath lifting operations or working at heights, secure area with barriers, implement area access restriction for authorized personnel only and warning signage. • Require workers to wear approved safety helmets at all times within construction areas.
Excavation and trench collapse	• Undertake utility surveys prior to excavation. • Prepare excavation risk assessments (JHA/JSA)
	• Install trench support systems or benching where required. • Inspect excavations daily and after rainfall. • Prevent unauthorized access using barriers and warning signage. • Provide safe means of entry and exit.

Impact or Risk	Mitigation / Management
	• Suspend work if excavation stability cannot be assured.
Mobile plant and heavy equipment	• Implement the Traffic Management Plan. • Separate pedestrians and vehicles wherever practicable. • Designate plant operating zones. • Fit mobile equipment with reversing alarms and warning devices. • Use trained and authorized operators only. • Conduct daily pre-start inspections. • Enforce speed limits and traffic control measures.
Vehicle and traffic hazards	• Implement the Traffic Management Plan. • Provide trained traffic controllers where required. • Clearly mark pedestrian routes. • Schedule deliveries to minimize congestion. • Maintain emergency vehicle access at all times. • Inspect traffic control devices regularly.
Lifting operations	• Prepare lift plans for complex lifts. • Use certified lifting equipment. • Inspect lifting gear before use. • Appoint competent lifting supervisors and riggers where required. • Establish exclusion zones and appropriate warning signage. • Do not exceed equipment rated capacities. • Suspend crane operations during high winds or severe weather.
Electrical hazards	• De-energies systems before work where practicable. • Implement lockout/tagout (LOTO) procedures. • Inspect electrical equipment regularly. • Use Ground Fault Circuit Interrupters (GFCIs) for temporary electrical installations.

Impact or Risk	Mitigation / Management
	• Protect cables against damage and water contact. • Restrict electrical work to competent and authorized personnel.
	• Remove combustible materials from work areas. • Maintain suitable fire extinguishers nearby. • Assign trained fire watches where required. • Inspect work areas after completion to confirm no ignition sources remain. • Coordinate emergency arrangements with the Emergency Preparedness and Response Plan.
	• Use mechanical lifting aids (e.g. forklifts, hoists, wheelbarrows and lifting devices). • Assess manual handling tasks during JHAs / JSAs. • Train workers in safe lifting techniques. • Rotate repetitive tasks to reduce fatigue. • Store materials at appropriate heights to minimize awkward lifting and bending. • Encourage early reporting of musculoskeletal discomfort.
Noise and vibration	• Select low-noise equipment where practicable. • Maintain equipment in good operating condition. • Isolate noisy equipment where feasible. • Limit worker exposure through work rotation. • Provide hearing protection where required. • Conduct periodic noise monitoring to ensure that occupational exposure noise limits are not exceeded.
	• Restrict high-noise activities to normal daytime working hours where practicable.
Dust and airborne contaminants	• Implement dust suppression measures, including water spraying during demolition and earthworks. • Minimize dust generation during material handling.

Impact or Risk	Mitigation / Management
	• Cover trucks transporting loose materials and clean roads from debris into access streets to site • Maintain good housekeeping. • Provide appropriate respiratory protective equipment where required. • Monitor airborne dust where necessary. • Refer to the Pollution Prevention and Resource Efficiency Management Plan for environmental dust control measures.
Heat stress, ultraviolet (UV) radiation and dehydration	• Develop and implement a Heat Stress Management Procedure. • Schedule physically demanding tasks during cooler periods of the day where practicable. • Provide shaded rest areas close to work locations. • Ensure continuous access to cool potable drinking water • Establish regular hydration periods. • Implement work/rest regimes during periods of elevated heat stress. • Acclimatize new workers gradually. • Train workers and supervisors to recognize signs and symptoms of heat-related illness. • Monitor weather conditions and suspend strenuous outdoor work where heat conditions become unsafe. • Require suitable sun-protective clothing, sunscreen and wide-brim hard hat attachments where appropriate.
Hazardous substances and chemicals	• Maintain an inventory of hazardous substances used on site (location, volume, units). • Ensure current Safety Data Sheets (SDS) are available on site. • Label all chemical containers using international standards.
	• Store hazardous substances in designated bunded storage areas. • Provide suitable PPE for chemical exposure risks and ensure that workers use them. • Train workers in safe handling procedures of chemicals and use of PPE.

Impact or Risk	Mitigation / Management
	• Implement spill prevention and response measures in accordance with the Pollution Prevention and Resource Efficiency Management Plan. • Dispose of hazardous wastes in accordance with the Waste and Hazardous Materials Management Plan.
Fire and explosion	• Store fuels and flammable materials in approved locations. • Maintain adequate fire extinguishers throughout the site and at flammable materials storage areas. • Control ignition sources through a Permit to Work system. • Conduct routine inspections of fuel storage areas. • Prohibit smoking except in designated areas. • Coordinate emergency response with the Emergency Preparedness and Response Plan. • Conduct regular fire drills.
Poor housekeeping	• Maintain clean and orderly work areas. • Remove waste regularly. • Store materials safely and securely. • Keep walkways, emergency exits and access roads clear. • Immediately clean spills. • Inspect housekeeping conditions during daily site inspections.
Worker welfare, hygiene, hydration, shading, lodging, and transport	• Provide clean and potable drinking water at all work locations and lodging (if provided to workers). • Provide adequate toilets, handwashing facilities and rest shelters. Specific toilets for women and sufficient numbers across site and lodging (if provided to workers). • Maintain welfare facilities in a clean and hygienic condition across site and lodging (if provided to workers). • Ensure appropriate waste collection and disposal with approved waste and wastewater collectors. • Provide separate welfare facilities (accommodation rooms, locker rooms, showers and toilets for women) where required. • Conduct routine inspections of welfare facilities, lodging facilities and

Impact or Risk	Mitigation / Management
	vehicles transporting project workers (if provided to workers by project, contractors or subcontractors).
Fatigue and fitness for work	• Establish working hour limits consistent with national legislation and good practice. • Schedule adequate rest breaks. • Monitor and document overtime. • Encourage workers to report fatigue. • Prohibit work while impaired by alcohol or drugs. • Implement a Fitness for Work program for safety-critical activities where appropriate.
Infectious and communicable diseases	• Promote good personal hygiene practices. • Maintain clean welfare and lodging (if applicable) facilities. • Provide handwashing stations. • Encourage workers to report illness. • Exclude workers with communicable diseases from work where necessary. • Follow public health guidance issued by the Government of The Bahamas. • Conduct awareness training on communicable disease prevention.

Source: 4CR, 2026

1.9 GENERAL OHS REQUIREMENTS

The following general OHS requirement must be implemented as part of this Plan.

1.9.1 Hazard Identification and Risk Assessment (HIRA)

Establish and maintain procedures to identify occupational hazards and assess risks before work commences and whenever work activities change. All risk assessments shall:

- Identify hazards associated with each work activity.
- Evaluate the likelihood and severity of potential consequences.
- Identify appropriate control measures using the Hierarchy of Controls.
- Be reviewed whenever work methods change or following incidents.
- Be communicated to affected workers.

High-risk activities shall be supported by documented Job Hazard Analyses (JHAs) or Job Safety Analyses (JSAs).

1.9.2 Safe Work Method Statements (SWMS)

Establish and maintain procedures to develop and implement Safe Work Method Statements (SWMS) for high-risk activities before work commences and whenever work activities change. All SWMS shall:

- Clearly state the specific high-risk activity covered by the SWMS (e.g., work at heights, confined spaces).
- List the hazards associated with the task and the risks they pose (e.g., falls, structural collapse)
- Specify the exact controls to eliminate or minimize risks (engineering, administrative, PPE)
- Describe how controls will be applied, monitored, and reviewed (responsible persons, job sequence, supervision).
- Validation of competency and training before carrying out the works.

High-risk activities shall be supported by documented Job Hazard Analyses (JHAs) or Job Safety Analyses (JSAs).

1.9.3 Hierarchy of Controls

All occupational risks shall be managed using the following hierarchy:

- Elimination.
- Substitution.
- Engineering controls.
- Administrative controls.
- Personal Protective Equipment (PPE).

PPE shall not be relied upon as the sole means of risk control where higher-order controls are reasonably practicable.

1.9.4 Permit to Work (PTW)

Establish and implement a Permit to Work (PTW) system for activities presenting elevated occupational risks. The PTW must define the scope of work, hazards, required controls, emergency arrangements, competent persons responsible, duration of permit, and permit close-out requirements. As a minimum, permits shall be required for:

- Demolition activities.
- Hazardous material removal, including asbestos-containing materials.
- Hot works.
- Excavation and trenching.
- Working at height.
- Crane and lifting operations.
- Electrical isolation and energized electrical work.
- Confined space entry (where applicable).
- Work adjacent to live traffic.

1.9.5 Personal Protective Equipment (PPE)

Employers must provide to their workers with appropriate PPE at no cost to workers. The minimum mandatory PPE shall include:

- Safety helmet.
- High-visibility clothing.
- Safety footwear.
- Safety glasses.

Additional PPE shall be provided according to task-specific risk assessments, including:

- Hearing protection.
- Respiratory protection.
- Fall arrest equipment.
- Welding shields.
- Chemical-resistant gloves and clothing.
- Face shields.
- Cut-resistant gloves.

Note. All Workers shall receive training in the correct use, inspection, maintenance and limitations of PPE.

1.9.6 Training and Competency

All personnel must receive appropriate health and safety training prior to carrying out work. Such training shall include:

- Site induction.
- Task-specific training.
- Emergency response procedures.
- Hazard communication.
- Manual handling.
- Heat stress awareness.
- Working at height.
- Excavation safety.
- Traffic safety.
- Hazardous materials awareness.
- Incident reporting.

Note: Competency shall be verified before workers undertake high-risk activities.

1.9.7 Toolbox Talks

Toolbox talks shall be conducted:

- At least daily or weekly.
- Prior to commencing new work activities.

- Following significant incidents or near misses.
- Prior to high-risk activities.
- Following changes to work methods or identified hazards.
- Attendance records shall be maintained, documented and reported.

1.9.8 Fitness for Work

All workers shall be physically and mentally fit to perform their assigned duties. The Project shall:

- Prohibit work under the influence of alcohol or illicit drugs.
- Manage fatigue through appropriate work scheduling.
- Encourage early reporting of illness.
- Assess workers returning from injury before resuming duties where appropriate.

1.9.9 Stop Work Authority

- Every worker shall have the authority and responsibility to immediately stop work where they reasonably believe an activity presents an imminent risk to health, safety, property or the environment.
- No worker shall be subject to disciplinary action for exercising Stop Work Authority in good faith.
- Work shall only be recommended once hazards have been assessed and appropriate controls implemented.

1.9.10 Worker Consultation and Participation

Workers shall be encouraged to actively participate in OHS management through:

- Toolbox talks.
- Safety meetings.
- Hazard reporting.
- Safety observations.
- Accident and Near miss reporting.
- Incident investigations.
- Risk assessments.
- Workers Grievance Mechanism.

Suggestions from workers will be considered for continuous improvement of the OHSMP.

1.9.11 Inspections and Audits

As part of this Plan, routine inspections must be conducted, and these shall include:

- Daily supervisor inspections.
- Weekly HSE inspections.
- Monthly management inspections.
- Contractor compliance inspections.

- Equipment inspections.
- Inspection to welfare facility on site, lodging or accommodation facilities, and vehicles transporting project personnel (if provided to project workers).
- PPE compliance inspections.

Internal audits shall be undertaken periodically to verify implementation of this Plan and compliance with Project requirements.

1.9.12 Incident Reporting and Investigation

All OHS incidents (i.e. accidents, near misses, illnesses, unsafe conditions, unsafe behaviors, environmental spills and property damage shall be reported immediately. An investigation must be conducted to:

- Identify root causes.
- Determine contributing factors.
- Identify corrective and preventive actions.
- Assign corrective actions and responsibilities.
- Verify completion of corrective actions.
- Share lessons learned across the Project.

All incidents shall be incorporated in the Contractor's ESMP reporting.

Environmental and social incidents, accidents, complaints, or unforeseen conditions that may pose significant environmental, health, safety, or social risks shall be reported immediately (within 24 hours for a notification and 10 days for a preliminary report).

1.9.13 Workers Grievance Mechanism

Ensure that all project workers, including workers of contractors and subcontractors, shall have access to the Workers Grievance Mechanism:

- workers must be informed about the mechanism during induction and toolbox talks, and explained about anonymous option for making a complaint, and about the anti-retaliation policy where no worker will be punished for raising a grievance.
- All OHS grievances received must be considered and feed the hazard identification, incident prevention, corrective actions, and general OHS management system of the Project.
- The Project must provide feedback to complainant about the response and corrective actions taken.

1.9.14 Contractor Management

All Project contractors and subcontractors shall:

- Develop activity-specific safe work procedures.
- Comply with this OHSMP.
- Participate in Project inspections and audits.
- Maintain competent supervision.
- Provide evidence of worker competency where required.

- Cooperate during incident investigations.
- Implement corrective actions within agreed timeframes.

Contractor performance will be monitored throughout the Project and OHS performance shall be considered during general contractor performance evaluations.

1.10 DOCUMENTATION AND MONITORING

Evidence of the Plan's implementation will be required to be documented and retained to demonstrate compliance. Implementation documentation shall be retained on-site and made available upon request. The implementation evidence shall be done in physical records and digital (including native and scanned files, as well as photography where appropriate), including but not limited to the following:

- Project organizational chart and OH&S responsibilities.
- Job Hazard Analyses (JHAs) / Job Safety Analyses (JSAs).
- Safe Work Method Statements (SWMS), where applicable.
- Permit to Work (PTW) records.
- Daily pre-start inspection checklists.
- Plant and equipment inspection records.
- Preventive maintenance records.
- Scaffolding inspection records.
- Excavation inspection records.
- Lifting equipment inspection and certification records.
- PPE issue and replacement records.
- Occupational exposure monitoring results (where undertaken).
- Health surveillance records (where applicable).
- Heat stress monitoring records.
- Training, induction and competency records.
- Toolbox talk attendance records.
- Safety meeting minutes.
- Contractor competency records.
- Visitor induction records.
- Emergency response and evacuation drill reports.
- Incident, accidents, illness and near-miss investigation reports.
- Corrective Action Register.
- Safety inspection reports.
- Internal audit reports.
- Contractor OHS performance monitoring.
- Monthly OHS Reports, including review of accident trends and OHS corrective actions.

- Monthly / Quarterly compliance reports.

All records shall be retained for the duration of the Project and for any additional period required by applicable legislation or contractual obligations.

1.11 KEY PERFORMANCE INDICATORS

The following KPIs shown below will be useful to determine if the Plan has been effectively implemented. Based on the level of compliance with indicators, the Project can identify if changes are necessary and can consider improvement measures.

Impact / Aspect	KPI	Target	Method	Monitoring Tool	Frequency
Legal compliance	Regulatory notices or enforcement actions	Zero	Compliance review	Compliance Register	Monthly
Worker induction	Personnel receiving OH&S induction before commencing work	100%	Training record review	Training Matrix	Prior to mobilization and for all new personnel
Toolbox talks	Planned toolbox talks completed	100%	Attendance review	Toolbox Talk Register	Weekly
Permit to Work	High-risk activities undertaken under an approved Permit to Work	100%	Permit review	Permit Register	Continuous
PPE compliance	Workers provided with required PPE	100%	Site inspections	PPE Inspection Checklist	Monthly
Plant and equipment	Scheduled inspections completed	100%	Inspection review	Plant and equipment inspection records	Monthly
Heat stress	Confirmed heat stress illnesses requiring medical treatment	Zero	Incident review	Incident Register	Continuous
Occupational exposure	Occupational exposure limits exceeded (noise, dust, chemicals)	Zero exceedances	Monitoring	Exposure Monitoring Records	As required
First aid	First aid kits inspected and fully stocked	100%	Inspection	First Aid Checklist	Weekly

Impact / Aspect	KPI	Target	Method	Monitoring Tool	Frequency
Emergency preparedness	Planned emergency drills completed	100%	Record review	Emergency Drill Schedule, Register and Evaluation Reports	Every drill
Incident reporting	Incidents, accidents and near misses reported within 24 hours	100%	Record review, OHS Incident and Accident statistics	Incident Register, Investigation Reports, Notification of accident records to authorities.	Continuous and included in monthly OHS reporting
Incident investigation	Recordable incidents investigated	100%	Record review and Accident statistics	Investigation Reports	Each incident and included in monthly OHS reporting
Corrective actions	Corrective actions closed by due date	≥95%	Register review	Corrective Action Register	Monthly
Lost Time Injuries	Lost Time Injury Frequency Rate (LTIFR)	Zero target / continuous improvement	Record review and Accident statistics	OH&S Performance Report, monthly OHS accident investigation and reports	Monthly
Total Recordable Injuries	Total Recordable Injury Frequency Rate (TRIFR)	Continuous improvement; no increasing trend	Record review and Accident statistics	OH&S Performance Report, monthly OHS accident investigation and reports	Monthly
Fatalities	Worker fatalities reported <24 hours.	Zero	Record review and Accident statistics	OH&S Performance Report, monthly OHS accident investigation and reports, Notification of accident records to authorities.	Continuous and included in monthly OHS reporting
Near miss reporting	Near misses reported	Increasing trends demonstrated proactive reporting	Record review	Near Miss Register	Monthly

Impact / Aspect	KPI	Target	Method	Monitoring Tool	Frequency
Safety inspections	Scheduled OHS inspections completed	100%	Inspection review	Inspection Schedule	Monthly
Contractor compliance	Contractor OH&S audit score	≥90% compliance	Audit	Contractor Audit Checklist	Quarterly
Worker consultation - OHS Grievances	OHS grievances received from project workers, attended and responded within required timeframe.	100% of grievances responded within required timeframe	Record review of OHS Worker Grievances	OHS Worker Grievance matrix	Monthly
Worker welfare	Welfare facilities meeting Project requirements and WBG´s General EHS standards	100% compliance	Inspection and Record review	Welfare Inspection Checklist	Weekly
Fitness for work	Workers assessed fit for safety-critical activities where required	100%	Supervisor verification	Fitness Records	Prior to assignment
Stop Work Authority	Valid Stop Work interventions investigated and closed	100%	Investigation review	Stop Work Register	Each occurrence

Source: 4CR, 2026

1.12 REPORTING

The Contractors are required to report to the Project EHS Manager the following:

- Weekly inspection reports.
- Monthly OHS Monitoring Reports summarizing:
  - inspection findings;
  - monitoring results;
  - incidents and non-conformances;
  - statistics of accidents, illnesses, near misses, etc.
  - Investigation reports and corrective actions;
  - Received workers complaints or grievances; and
  - Corrective actions were implemented and closed within the due date.

Under the IDB ESPF and ESPS1, the Plan implementation should be included in the Project's regular Environmental and Social monitoring reports (typically quarterly during construction, unless otherwise agreed with IDB). Reporting should include:

- Status of Plan implementation.
- Results of OHS inspections and monitoring.
- Compliance with OHS requirements.
- Summary of incidents, accidents, fatalities, near misses, workers OHS complaints and non-conformances.
- Corrective and preventive actions implemented.
- Outstanding actions and recommendations.
- Photographic evidence where appropriate.

A summary of the reporting activities, frequency, and responsibilities is outlined in the following table.

Reporting Activity	Frequency	Responsible
Daily Pre-Start Safety Inspection Report	Daily	Site Supervisor / OHS Officer
Daily High-Risk Activity Inspection Report (where applicable)	Daily	Site Supervisor / OHS Officer
Incident (Accidents and Near Miss) Reports	Immediately following occurrence	Supervisor / OHS Officer / HSE Manager
Accident and Fatality Notification	Immediately	OHS Officer / Construction Manager / HSE Manager / Project Manager
Weekly Safety Inspection Report	Weekly	Site Supervisor / OHS Officer
Toolbox Talk Attendance Records	Weekly (minimum)	Site Supervisor / OHS Officer
Permit to Work Register	Continuous	OHS Officer / HSE Manager
Corrective and Preventive Actions registers and reports	Updated continuously	Contractors and Subcontractors / Construction Manager / OHS Officer / HSE Manager
Monthly OHS Performance Report	Monthly	OHS Officer / HSE Manager
Internal OHS Audit Report	Quarterly (minimum)	Project Manager / HSE Manager
Contractor Performance Review	Quarterly	Project Manager
Worker OHS grievances or complaints reports	Weekly	Contractor / Community Liaison Officer

Reporting Activity	Frequency	Responsible
Environmental and Social monitoring report to IDB	Quarterly (or as agreed with the IDB)	Project Proponent

Source: 4CR, 2026

1.12.1 Corrective and Preventive Actions registers and reports

Where deficiencies are identified, the Construction Manager, Contractors and Subcontractors are required to:

- Investigate immediate and root causes.
- Identify corrective and preventive actions.
- Assign responsibilities.
- Establish implementation deadlines.
- Allocate appropriate resources.
- Verify completion of actions.
- Confirm effectiveness through follow-up inspections.
- Update risk assessments where required.
- Revise Safe Work Method Statements, Job Hazard Analyses or Permit to Work procedures as necessary.
- Deliver additional training where deficiencies relate to worker competency.
- Communicate lessons learned to all relevant personnel.

The HSE Manager is responsible for reviewing the reports and following up with the implementation of the corrective actions. Corrective actions shall be tracked through the Corrective Action Register until formally closed.

1.12.2 Monthly OHS Performance Report

The Monthly OHS Performance Report shall include, as a minimum:

- Summary of construction activities.
- Workforce statistics (including contractor personnel by gender).
- Hours worked in the period.
- OHS KPI performance.
- Incident and accident statistics, with a brief description of each event, and status and results of investigation process, evidence of notification to relevant stakeholders and government agencies.
- Accident statistics and indicators:
    - Lost Time Injury Frequency Rate (LTI)
    - Total Recordable Injury Frequency Rate (TRIFR)
    - Medical Treatment Cases (MTC).
    - Restricted Work Cases (RWC).

    - First Aid Cases (FAC).
    - Near misses.
    - Dangerous occurrences.
- Safety inspections planned vs completed.
- Schedule of audits planned vs completed.
- Training planned vs completed.
- Toolbox talks planned vs completed.
- Permit to Work statistics.
- Occupational exposure monitoring results (where applicable), including heat stress monitoring results.
- Emergency response drills planned vs completed
- Outstanding corrective actions.
- Updated HIRA matrix based on OHS risks reviews.
- Worker grievances relating to OHS, response to each grievance, timeframe of response and pending responses.
- Planned improvement actions.

1.12.3 Incident Notification Procedure

All OHS incidents shall be reported immediately to the OHS Officer, the Site Supervisor and HSE Manager. The following incidents shall receive immediate notification to the Project Manager:

- Fatalities.
- Accidents
- Significant hazardous material exposure.
- Any asbestos-containing material related exposure or incidents.
- Traffic incidents involving Project personnel.
- Any incident with potential significant environmental or community impacts.

The initial notification shall include:

- Date and time.
- Location.
- Persons involved.
- Description of the incident.
- Immediate actions taken.
- Current status.
- Assistance required.

A formal investigation report shall follow as soon as practicable.

The EHS Manager and Project Manager will be responsible for coordinating the formal investigation and notification to key stakeholders such as MOHLR and IDB.

1.12.4 Reporting to Government Authorities

Where required under applicable legislation or permit conditions, the MOHLR shall notify the relevant Government authorities of The Bahamas of reportable OHS incidents (i.e. fatalities and accidents). Such notifications may include and shall include:

- Date of incident
- Description of incident
- Type of incident (Fatality, Accident, or other incidents required under national legislation).
- Persons affected.
- Preventive actions taken
- Investigation process status
- Root cause analysis.
- Follow up monitoring and next steps
- Channels for communication and engagement between parties

Copies of submitted notification and reports shall be documented, retained, maintained within the Project documentation system.

1.13 REVIEW AND UPDATE

This Plan shall be treated as a living document and reviewed throughout the Project to ensure continued effectiveness. The Project EHS Manager will review and update the Plan annually or in response to significant changes, monitoring results, or design changes. The Plan should be reviewed, updated and approved by the EHS Manager annually or in response to the following:

- Prior to commencement of demolition and construction, operation or closure phases.
- Before major changes in construction methods or sequencing.
- Following the identification of significant findings and/or deficiencies after OHS inspection or audits. In these cases, it is necessary to:
    - Investigate the root cause.
    - Implement corrective and preventive actions.
    - Assign responsibilities and completion dates.
    - Verify effectiveness following implementation.

The review process shall evaluate the following:

- Compliance with applicable OHS legislation and regulations.
- Compliance with IDB ESPS requirements.
- Achievement of OH&S objectives and KPI performance.
- Effectiveness of OHS management controls (i.e. risk assessment, hierarchy of controls).
- Adequacy of OHS training programs and competency of key personnel.
- OHS inspection and monitoring results (i.e. emergency equipment and first aid response).

- Trends analysis of OHS incidents (Accident statistics) and workers' complaints.
- Adequacy of welfare facilities for Project workers (including dining areas, toilets, locker rooms, showers, rest areas), and lodging and transport of project personnel (if provided).
- Contractor OHS performance and compliance.
- Effectiveness of corrective actions.
- Opportunities to improve OHS performance through adaptive management.

Annex F.1

Pollution Prevention and Waste Management Plan Guidance Document

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

> *Annex F comprises two parts:*
>
> *Annex F.1 Pollution Prevention and Waste Management Plan*
>
> *Annex F.2 Erosion and Sediment Prevention and Control Management Plan.*

1. INTRODUCTION AND SCOPE

1.1 INTRODUCTION

This Pollution Prevention and Waste Management Plan Guidance Document (the Plan) provides guidance on the procedures, responsibilities, and management measures to be considered when preparing project-specific Pollution Prevention and Waste Management Plan to prevent, minimize, and control pollution arising from project activities, while promoting the efficient use of natural resources, throughout the design, pre-construction (including demolition), construction, operation, and closure phases of projects financed under the Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064).

The project-specific Plan should be developed based on the guidance provided in this document and adapted to the nature, scale, location, and potential environmental and social risks and impacts of each project. The objectives are to:

- Prevent or minimize pollution to air, land, surface water, groundwater, and the surrounding environment resulting from project activities.
- Promote the efficient use of water, energy, construction materials, and other natural resources.
- Reduce waste generation through the application of the waste management hierarchy (avoid, reduce, reuse, recycle, and recover before disposal).
- Prevent contamination arising from the storage, handling, and use of fuels, oils, chemicals, hazardous substances, concrete washout, and other potentially polluting materials.
- Control erosion and sediment generation arising from site clearing, earthworks, and demolition activities (Section 6.3).
- Minimize greenhouse gas (GHG) emissions associated with construction activities through efficient equipment operation and resource management.
- Protect nearby communities and environmentally sensitive receptors from pollution-related impacts.
- Establish monitoring, reporting, inspection, and corrective action procedures to verify the effectiveness of pollution prevention and resource efficiency measures.
- Ensure compliance with the environmental requirements of The Bahamas, the IDB Environmental and Social Policy Framework (ESPF), including ESPS 1 and ESPS 3, and Good International Industry Practice (GIIP).

1.2 SCOPE

This Guidance Document provides guidance for the preparation of project-specific Pollution Prevention and Waste Management Plans for all project-related activities throughout the project lifecycle, including mobilization, pre-construction (including demolition), construction, operation (where applicable), and closure phases, consistent with the phases in described in the ESMF. This project-specific Plan should apply to all project personnel, contractors, subcontractors, suppliers, and visitors undertaking activities that may generate pollution, consume resources, or disturb soil during the pre-construction, construction, and site reinstatement phases.

The project-specific Plan should address, as applicable, all project areas, including:

- Site clearing and earthwork areas

- Demolition work areas
- Excavation works
- Temporary access roads
- Fuel, chemical, and material storage areas
- Laydown and stockpile areas
- Waste storage and segregation areas
- Borrow fill storage areas (if applicable)
- Construction compounds
- Concrete batching or concrete washout areas (where applicable)
- Vehicle parking and refueling areas
- Utility installation corridors
- Drainage works
- Stormwater management infrastructure
- Landscape and rehabilitation areas

The project-specific Plan should also address, as applicable, off-site activities undertaken on behalf of a project or associated facilities, which may include:

- Transportation of construction materials.
- Transportation and disposal of waste.
- Procurement and delivery of construction materials.
- Borrow areas or approved disposal facilities used by the project (where applicable).

Monitoring, inspection, incident reporting and investigation, corrective actions, and periodic review of the project-specific Plan's performance shall be carried out to ensure continual improvement and compliance with applicable legal requirements and the IDB ESPF and ESPS.

2. ROLES AND RESPONSIBILITIES

MOHLR is responsible for ensuring that project-specific Plans are prepared and implemented by employees, contractors, and subcontractors in alignment with this Guidance Document and international requirements and best practice. Contractors shall implement the practices established in the project-specific Plan and shall establish detailed procedures to apply the management practices on the ground. MOHLR shall review and approve project-specific Plan prior to implementation.

Role	Responsibilities
MOHLR	Review and approve the Plan for each project; ensure the availability of resources necessary for implementation.
Project Manager (PIU)	Overall responsibility for effective implementation, including: providing adequate resources (personnel and equipment); ensuring contractors comply with the Plan and contractual requirements; supporting corrective actions following inspections, audits, or incidents; and ensuring pollution prevention and resource efficiency are incorporated into construction planning.
EHS Manager (Contractor)	Overseeing implementation and monitoring, including: developing, maintaining, and periodically reviewing the Plan at project level; monitoring compliance through inspections and audits; investigating incidents and identifying additional control measures; coordinating environmental monitoring; reviewing and recommending corrective actions; liaising with regulatory authorities where required; and reporting the Plan's performance to the PIU and the IDB.
Construction / Site Manager	Implementing the Plan's management measures in the field, including: integrating pollution prevention and resource efficiency measures into daily construction activities; planning site activities to minimize pollution and improve resource efficiency; supervising implementation of control measures; ensuring site personnel are trained; and investigating pollution incidents, particularly those related to community complaints.
Project workers	Participating in required pollution prevention and resource efficiency awareness training; identifying and reporting control deficiencies or opportunities for improvement; and complying with environmental procedures.
Contractors and subcontractors	Complying with the requirements of this Plan; installing and maintaining pollution prevention and resource efficiency measures and reporting deficiencies; training personnel in relevant environmental aspects; developing and implementing task-specific procedures where required; and presenting documentary evidence of implementation.

3. PROJECT ACTIVITIES AND POTENTIAL IMPACTS

The following activities have the potential to generate pollution or consume natural resources during project implementation.

Activity	Potential Environmental Aspect
Site establishment	Waste generation, energy and water consumption
Demolition of existing structures	Dust, noise, waste generation, debris management, hazardous materials such as asbestos-containing materials or wastes (if encountered)
Clearing and grubbing	Dust emissions, vegetation waste, fuel consumption
Utility relocation	Excavated material, spoil management, fuel use
Earthworks and excavation	Dust emissions, sediment runoff, fuel consumption
Cut-and-fill operations	Dust, equipment emissions, material and natural resource use
Foundation construction	Concrete washout, wastewater generation, cement handling
Concrete placement	Wash water, material wastage, water consumption
Building construction	Construction waste, packaging waste, material efficiency
Utility installation	Excavated spoil, fuel consumption, wastewater generation
Internal road construction	Dust emissions, asphalt or concrete waste, fuel use
Vehicle and equipment operation	Exhaust emissions, fuel consumption, oil and lubricant leaks, noise
Equipment maintenance	Waste oils, used filters, oily rags, hazardous waste, spill risks
Fuel storage and refueling	Potential fuel spills, soil and groundwater contamination
Storage and handling of chemicals	Hazardous material management, spill prevention
Temporary worker facilities	Domestic wastewater, solid waste generation, water and electricity consumption

Activity	Potential Environmental Aspect
Hazardous and non-hazardous waste segregation, storage, transport, and disposal	Generation of construction and general waste (including hazardous wastes such as asbestos-containing materials), segregation, recycling, disposal, and resource recovery

The Contractor shall plan and sequence activities to minimize pollution generation and maximize resource efficiency throughout the project. Pollution prevention shall be prioritized through source reduction and good housekeeping before relying on treatment or disposal measures. Resource efficiency shall be promoted through responsible procurement, efficient equipment operation, waste minimization, reuse, recycling, and continual improvement of construction practices.

4. KEY RISKS AND IMPACTS

The following describes the key impacts associated with project activities, which occur primarily during pre-construction (demolition) and construction phases:

- Demolition, excavation, earthworks, material handling, vehicle movements, and operation of construction equipment may generate dust (particulate matter) and exhaust emissions, affecting local air quality, nearby communities, workers, and sensitive receptors.
- Construction equipment, demolition activities, heavy vehicles, generators, and powered tools may generate elevated noise and vibration levels that could disturb nearby residents and other sensitive receptors.
- Stormwater sediment runoff, concrete wash water, domestic wastewater, fuels, oils, chemicals, and other pollutants may contaminate drainage systems, groundwater, wetlands, and coastal waters if not properly managed.
- Accidental spills or leaks of fuels, oils, lubricants, chemicals, concrete, paints, solvents, and hazardous substances may contaminate soils and require remediation.
- Improper storage, handling, or disposal of fuels, chemicals, waste oils, contaminated materials, batteries, or other hazardous waste (including asbestos-containing wastes from demolition) may create environmental pollution and health and safety risks.
- Demolition and construction activities generate significant quantities of construction debris, packaging materials, scrap metal, timber, concrete, plastics, and domestic waste. Poor waste management may result in pollution, inefficient resource use, and unnecessary disposal.
- Construction activities may result in excessive consumption of potable water, electricity, fuel, aggregates, timber, steel, concrete, and other materials, increasing environmental impacts and project costs.
- Fuel consumption by construction equipment, generators, heavy vehicles, and transportation of materials contributes to direct and indirect greenhouse gas emissions; equipment servicing, refueling, and fuel/lubricant storage may result in leaks, spills, wastewater generation, and contamination if controls are inadequate.
- Poor site housekeeping, uncontrolled waste storage, litter, material stockpiles, and accumulated debris may reduce site safety, increase pollution risks, attract pests, and negatively affect the surrounding community.
- Site clearing, demolition, and earthworks on exposed or sloped surfaces may generate erosion and sediment runoff affecting drainage systems, adjacent properties, and downstream water bodies (see Section 6.3).

5. ENVIRONMENTAL MANAGEMENT MEASURES

The project shall adopt and implement the following best-practice measures to address the risks and impacts described in Section 5.

5.1 AIR EMISSIONS AND DUST GENERATION

- Implement dust suppression measures (e.g., water spraying) on exposed surfaces, haul roads, and stockpiles during dry conditions.
- Cover trucks transporting fine or loose materials.
- Establish site speed limits to reduce dust generation.
- Maintain construction equipment per manufacturer recommendations to minimize exhaust emissions.
- Prohibit unnecessary idling of vehicles and equipment.
- Investigate and respond promptly to community complaints regarding dust emissions.
- Locate generators and high-emission equipment away from sensitive receptors where practicable.

5.2 NOISE AND VIBRATION

- Restrict noisy construction activities to approved working hours.
- Maintain construction equipment per manufacturer recommendations to minimize excessive noise and vibration.
- Schedule particularly noisy activities in consultation with nearby communities where required.
- Position stationary equipment away from sensitive receptors where practicable.
- Investigate and respond promptly to community complaints regarding noise.

5.3 EROSION AND SEDIMENT CONTROL

The following measures apply to site clearing, earthworks, demolition, and excavation activities with potential to generate erosion or sediment runoff:

- Minimize the area and duration of exposed soil at any given time through phased clearing and progressive stabilization.
- Install and maintain sediment and erosion controls (e.g., silt fencing, sediment traps, diversion berms) at the perimeter of disturbed areas and around stockpiles, prior to the commencement of earthworks.
- Direct stormwater runoff away from exposed or disturbed areas where practicable.
- Stabilize disturbed areas as soon as practicable following completion of earthworks (e.g., temporary or permanent vegetation, mulching, or hardstanding).
- Inspect erosion and sediment controls regularly, particularly before and after rainfall events, and repair or reinstate as needed.
- Maintain stockpiles of topsoil and excavated material in stable configurations, away from drainage lines.

5.4 SURFACE WATER AND GROUNDWATER POLLUTION

- Prevent discharge of untreated wastewater or contaminated runoff into unauthorized areas or local natural drainage.
- Provide designated concrete washout areas.
- Install spill containment around fuel and chemical storage areas and maintain spill response kits; store hazardous substances within designated, bunded areas capable of containing at least 110% of the largest container volume.
- Store fuels and chemicals away from drainage systems and environmentally sensitive receptors.
- Manage domestic wastewater through approved sanitation facilities.
- Inspect drainage systems regularly to ensure they remain free of contaminants.

5.5 SOIL CONTAMINATION

- Install spill containment around fuel and chemical storage areas and maintain spill response kits at these locations.
- Refuel equipment only in designated areas where practicable.
- Maintain spill kits at fuel storage, refueling, and maintenance locations.
- Immediately contain and clean up spills using appropriate materials.
- Dispose of contaminated soil through approved waste management procedures.
- Train personnel in spill prevention and emergency response procedures.

5.6 HAZARDOUS MATERIALS AND HAZARDOUS WASTE

- Maintain an inventory of hazardous materials.
- Ensure all hazardous substances are appropriately labelled and accompanied by Safety Data Sheets (SDS).
- Segregate hazardous waste from general waste.
- Store hazardous waste in secure, weatherproof areas with secondary containment.
- Dispose of hazardous waste through licensed or approved facilities.
- Inspect hazardous material storage areas regularly for leaks or deterioration.

5.7 CONSTRUCTION AND DOMESTIC WASTE GENERATION

- Apply the waste hierarchy: avoid, reduce, reuse, recycle, recover, and dispose.
- Segregate waste streams at source.
- Maximize reuse of excavated materials and construction offcuts where feasible.
- Recycle metals, cardboard, plastics, timber, and other suitable materials where facilities are available.
- Provide adequate waste collection containers throughout the site.
- Dispose of domestic waste through licensed or approved facilities.

5.8 RESOURCE EFFICIENCY (WATER, ENERGY, AND MATERIALS)

- Monitor water and electricity consumption throughout construction.
- Use water-efficient equipment and promptly repair water leaks.
- Switch off equipment, lighting, and generators when not in use.
- Optimize procurement to reduce over-ordering and material waste.
- Incorporate energy-efficient design and solar panels into housing units to reduce operational energy consumption.
- Encourage suppliers to minimize packaging materials.
- Promote environmental awareness among workers regarding resource conservation.

5.9 GREENHOUSE GAS EMISSIONS

- Maintain equipment to optimize fuel efficiency.
- Minimize unnecessary vehicle and equipment idling.
- Utilize energy-efficient generators and equipment where feasible.
- Monitor fuel consumption throughout construction to identify opportunities for improvement.

5.10 VISUAL NUISANCE AND HOUSEKEEPING

- Maintain a clean and orderly work site.
- Remove waste regularly from active work areas.
- Store materials in designated locations.
- Secure waste containers to prevent wind-blown litter.
- Conduct regular housekeeping inspections and promptly address deficiencies.

6. DOCUMENTATION AND MONITORING

Evidence of this Plan's implementation shall be documented and retained to demonstrate compliance, in both physical and digital form (including native and scanned files, and photography where appropriate), including but not limited to:

- Daily and weekly environmental inspection reports (with photographs) of pollution prevention and resource efficiency control implementation.
- Corrective Action Register.
- Register of community complaints related to pollution or nuisance from the project.
- Register of environmental permits and approvals.
- Fuel, water, and electricity consumption registers for each project phase.
- Waste generation, recycling, and disposal registers for each project phase.
- Hazardous material inventory and Safety Data Sheets (SDS).
- Hazardous waste manifests and disposal certificates.
- Equipment maintenance and servicing records.
- Spill reports and incident investigation reports.
- Environmental monitoring records (air quality, noise, wastewater, etc., where required).
- Pollution prevention and resource efficiency awareness training records.
- Monthly / quarterly Environmental Compliance Monitoring Reports.

Monitoring shall adopt an adaptive management approach whereby mitigation measures are modified where inspections indicate recurring pollution or nuisance, or ineffective controls.

7. KEY PERFORMANCE INDICATORS

The following KPIs will be used to determine whether this Plan has been effectively implemented. Based on the level of compliance with these indicators, MOHLR and the Contractor can identify whether changes or additional improvement measures are necessary.

Impact	KPI	Target	Method	Monitoring Tool	Frequency
Air emissions and dust generation	Dust suppression measures implemented	≥95% compliance during inspections	Site inspection	Inspection checklist	Weekly
Air emissions and dust generation	Construction equipment with excessive visible exhaust emissions	Zero non-compliant equipment operating on site	Visual inspection	Equipment inspection records	Weekly
Noise and vibration	Noise-related community complaints	≤2 substantiated complaints per month	Review grievance records	Grievance register	Monthly
Noise and vibration	Construction activities undertaken within approved working hours	100% compliance	Site inspection	Site diary, inspection reports	Weekly
Soil, surface water and groundwater pollution	Unapproved discharge of contaminated water	Zero uncontrolled or unapproved discharges	Site inspection	Environmental inspection reports	Continuous
Soil, surface water and groundwater pollution	Fuel and chemical storage areas with secondary containment	100% compliance	Inspection	Inspection checklist	Weekly
Soil, surface water and groundwater pollution	Concrete washout managed in designated areas	100% compliance	Site inspection	Inspection checklist	Weekly
Soil, surface water and groundwater pollution	Spill response initiated immediately following a spill	100% of spill events	Incident review	Incident investigation reports	Each occurrence

Impact	KPI	Target	Method	Monitoring Tool	Frequency
Hazardous materials and hazardous waste	Hazardous materials appropriately labelled and stored	100% compliance	Site inspection	Hazardous material inventory	Monthly
Hazardous materials and hazardous waste	Spill kits available and fully stocked at all hazardous storage areas	100% of designated locations	Inspection	Inspection checklist	Weekly
Hazardous materials and hazardous waste	Hazardous waste disposed of through approved facilities	100% compliance	Record review	Waste manifests and disposal certificates	Monthly
Construction and domestic waste generation	Waste correctly segregated	≥95% compliance	Site inspection	Waste inspection checklist	Weekly
Construction and domestic waste generation	Waste containers not exceeding capacity	100% compliance	Inspection	Housekeeping inspection	Weekly
Resource efficiency	Water consumption monitored	100% of monthly consumption recorded	Meter reading	Water consumption log	Monthly
Resource efficiency	Electricity consumption monitored	100% of monthly consumption recorded	Meter reading	Electricity consumption log	Monthly
Resource efficiency	Fuel consumption monitored	100% of monthly fuel use recorded	Record review	Fuel consumption register	Monthly
Resource efficiency	Material wastage identified and corrective actions implemented	100% of significant wastage events investigated	Material audits	Procurement and material use records	Monthly
Greenhouse gas emissions	Unnecessary equipment idling observed	≤2 observations per month	Site inspection	Inspection reports	Weekly

Impact	KPI	Target	Method	Monitoring Tool	Frequency
Greenhouse gas emissions	Preventive maintenance completed according to schedule	≥95% compliance	Maintenance review	Equipment maintenance records	Monthly
Equipment maintenance and refueling	Fuel or oil leaks identified during inspections	Zero unresolved leaks	Site inspection	Equipment inspection checklist	Weekly
Equipment maintenance and refueling	Refueling undertaken in designated areas	100% compliance	Site inspection	Inspection reports	Weekly
Overall Plan implementation	Pollution-related community complaints	≤2 substantiated complaints per month	Review grievance records	Grievance register	Monthly
Overall Plan implementation	Environmental inspections completed as scheduled	100% completed as scheduled	Inspection programmed review	Inspection records	Weekly
Overall Plan implementation	Corrective actions completed by due date	100% of corrective actions completed by due date	Corrective action review	Corrective Action Register	Monthly
Overall Plan implementation	Environmental awareness training completed	100% of project personnel trained	Training record review	Training matrix	Prior to mobilization and annually thereafter

8. REPORTING

Contractors are required to report to the (Contractor) EHS Manager:

- Daily environmental inspection records.
- Weekly environmental inspection reports.
- Monthly Environmental Monitoring Reports summarizing inspection findings; pollution prevention performance; resource consumption trends; waste generation and recycling performance; spill incidents and investigations; environmental and community complaints; non-conformances; corrective actions implemented and closed within the due date; and opportunities for continual improvement.

Under the IDB ESPF and ESPS 1, Plan implementation shall be included in the project's regular Environmental and Social monitoring reports (typically quarterly during construction, unless otherwise agreed with the IDB). Reporting shall include:

- Status of Plan implementation.
- Results of inspections and monitoring.
- Compliance with control requirements and KPIs.
- Summary of environmental or pollution incidents, complaints, and non-conformances.
- Corrective and preventive actions implemented.
- Outstanding actions and recommendations.
- Photographic evidence where appropriate.

> *Any significant pollution event (e.g., major fuel or chemical spill, uncontrolled discharge to surface waters, or environmental incident with significant off-site impacts) shall be promptly reported to the PIU Project Manager and the IDB.*

Reporting Activity	Frequency	Responsible
Routine environmental and pollution inspections	Weekly / Monthly	Contractor
Formal review of the Plan	Every six months or following significant changes	Contractor / Supervision Consultant
Environmental and pollution compliance monitoring	Monthly	Contractor
Community complaint reports	Weekly	Contractor / Community Liaison Officer
Environmental and Social monitoring report to IDB	Quarterly (or as agreed with the IDB)	MOHLR

9. REVIEW AND UPDATE

This Plan shall be treated as a living document and reviewed throughout each project to ensure continued effectiveness. The (Contractor) EHS Manager shall review and update the Plan annually or in response to significant changes, monitoring results, or design changes, including:

- Prior to commencement of demolition, construction, operation, or closure phases.
- Before major changes in construction methods or sequencing.
- Following recurring community complaints relating to pollution or nuisance issues.
- Following the identification of significant findings and/or deficiencies after inspection or audits — in which case: investigate the root cause; implement corrective and preventive actions; assign responsibilities and completion dates; and verify effectiveness following implementation.

The review process shall evaluate:

- Compliance with ESPS 3 requirements.
- Effectiveness of pollution prevention measures.
- Resource consumption trends.
- Waste minimization and recycling performance.
- Environmental incidents and complaints.
- Contractor performance.
- Progress toward KPI targets.
- Effectiveness of corrective actions.
- Opportunities for continual improvement.

Annex F.2

Erosion and Sediment Prevention and Control Management Guidance Document

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

> *Annex F comprises two parts:*
>
> *Annex F.1 Pollution Prevention and Waste Management Plan)*
>
> *Annex F.2 Erosion and Sediment Prevention and Control Management Plan.*

1. INTRODUCTION AND SCOPE

1.1 INTRODUCTION

This Erosion and Sediment Prevention and Control Guidance Document provides guidance for the preparation of project-specific Erosion and Sediment Prevention and Control Plans for projects financed under the Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064).

The Guidance outlines recommended procedures, responsibilities, and control measures to prevent, minimize, and manage soil erosion and sediment transport associated with demolition, site preparation, construction, and rehabilitation activities. The measures should be adapted to the nature, scale, location, and potential risks and impacts of each project and incorporated into the applicable project-specific environmental and social management instruments and contractor plans.

The Guidance should be used in conjunction with applicable requirements of The Bahamas and the IDB Environmental and Social Policy Framework (ESPF), including ESPS 1 and ESPS 3. It is intended to support application of the mitigation hierarchy by prioritizing the prevention of erosion, minimizing unavoidable impacts, and restoring disturbed areas as soon as practicable.

1.2 SCOPE

This Guidance applies to the preparation of project-specific Erosion and Sediment Prevention and Control Plans for activities that have the potential to disturb soil or generate sediment throughout the project lifecycle, including mobilization, pre-construction (including demolition), construction, operation (where applicable), and closure phases, consistent with the phases of a project described in the ESMF.

The Guidance is intended for use by MOHLR, project personnel, contractors, subcontractors, and other parties responsible for preparing, implementing, or supervising project-specific erosion and sediment control measures.

The measures and procedures provided in this Guidance should be used to develop project-specific requirements that are appropriate to the identified risks and site conditions. The resulting project-specific Plan should establish the measures, responsibilities, monitoring, inspection, maintenance, reporting, and corrective actions necessary for effective erosion and sediment control during the relevant project activities.

2. OBJECTIVES

The objective of this Erosion and Sediment Prevention and Control Guidance Document is to establish the procedures, responsibilities, and control measures necessary to prevent, minimize, and manage soil erosion and sediment transport associated with the demolition, site preparation, construction, and rehabilitation activities of projects financed under the Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064).

Each project-specific Erosion and Sediment Control Plan should be developed to:

- Prevent soil erosion resulting from land clearing, excavation, grading, stockpiling, and construction activities.
- Minimize the transport of sediment from the project site to adjacent properties, drainage systems, wetlands, coastal waters, and other environmentally sensitive receptors.
- Protect surface water quality, groundwater recharge areas, and existing drainage infrastructure.
- Reduce the risk of flooding caused by sediment blockage of drainage channels and stormwater systems.
- Maintain compliance with the environmental requirements of The Bahamas and the IDB Environmental and Social Policy Framework (ESPF), including ESPS 1 and ESPS 3.
- Apply the mitigation hierarchy by preventing erosion where practicable, minimizing unavoidable impacts, and restoring disturbed areas as soon as practicable.
- Establish monitoring, inspection, maintenance, reporting, and corrective action procedures to ensure the effectiveness of erosion and sediment control measures throughout the project lifecycle.

3. APPLICABILITY

This Guidance Document applies to all project-related activities throughout the project lifecycle, including mobilization, pre-construction (including demolition), construction, operation (where applicable), and closure phases, consistent with the phases described in the ESMF. This Plan applies to all project personnel, contractors, subcontractors, suppliers, and visitors undertaking activities that may disturb soil or generate sediment during the demolition, construction, and site reinstatement phases.

The project-specific Erosion and Sediment Control Plan applies to all project areas, including:

- Site clearing areas
- Demolition areas
- Excavation works
- Earthworks and grading activities
- Temporary access roads
- Material storage areas
- Stockpile areas
- Borrow fill storage areas (if applicable)
- Construction compounds
- Utility installation corridors
- Drainage works
- Stormwater management infrastructure
- Landscaping areas
- Temporary laydown areas
- Vehicle washdown areas
- Waste storage areas

This Plan also applies to off-site areas where project activities may affect public drainage systems, roadways, watercourses, wetlands, coastal environments, or neighboring properties through sediment transport.

The requirements of this Plan shall be implemented prior to commencement of earth-disturbing activities and shall remain in force until all disturbed areas have been permanently stabilized and accepted by MOHLR.

Monitoring, inspection, incident reporting and investigation, corrective actions, and periodic review of this Plan's performance shall be carried out to ensure continual improvement and compliance with applicable legal requirements and the IDB ESPF and ESPS.

4. ROLES AND RESPONSIBILITIES

MOHLR is responsible for ensuring that employees, contractors, and subcontractors implement this Plan's policies and procedures, aligned with international requirements and best practice. Contractors shall implement the practices established in this Plan and shall establish detailed procedures to apply the management practices on the ground. MOHLR shall review and approve project-specific application of this Plan prior to implementation.

Role	Responsibilities
MOHLR	Review and approve the Plan for each project; ensure the availability of resources necessary for its implementation.
Project Manager (PIU)	Overall responsibility for effective implementation, including: providing adequate resources (personnel and equipment); ensuring contractors comply with the Plan and contractual requirements; supporting corrective actions following inspections, audits, or incidents; and ensuring erosion and sediment controls are incorporated into construction planning.
EHS Manager (Contractor)	Overseeing implementation and monitoring, including: developing, maintaining, and periodically reviewing the Plan at project level; monitoring compliance through inspections and audits; investigating incidents and identifying additional control measures; coordinating environmental monitoring; reviewing and recommending corrective actions; liaising with regulatory authorities where required; and reporting the Plan's performance to the PIU and the IDB.
Construction / Site Manager (Contractor)	Implementing the Plan's management measures in the field, including: integrating erosion and sediment controls into daily construction activities; planning site activities to minimize erosion and sediment risks; supervising implementation of control measures; ensuring site personnel are trained; and investigating erosion and sediment incidents, particularly those related to community complaints.
Project workers	Participating in required erosion and sediment awareness training; reporting control deficiencies or opportunities for improvement; complying with environmental procedures and implementing sediment and erosion prevention and control measures; and operating machinery in accordance with designated work areas, avoiding unnecessary disturbance of vegetation and stabilized areas.
Contractors and subcontractors	Complying with the requirements of this Plan; installing and maintaining erosion and sediment controls and reporting damaged controls; training personnel in relevant environmental aspects; developing and implementing task-specific procedures where required; and presenting documentary evidence of implementation.

5. PROJECT ACTIVITIES AND POTENTIAL IMPACTS

The following project activities have the potential to generate soil erosion, sediment transport, or degradation of stormwater quality.

Activity	Potential Source of Erosion and Sediment
Demolition of existing structures	Exposed soils and sediment-laden runoff
Land clearing and site establishment	Removal of vegetation exposing bare soil
Temporary use of access roads	Soil debris and material over access roads
Utility relocation	Excavation and trenching
Bulk earthworks	Large areas of exposed soil susceptible to erosion
Excavation and grading	Soil instability and sediment generation
Cut-and-fill operations	Increased runoff and erosion of exposed slopes
Installation of underground utilities	Open trenches and spoil stockpiles
Construction of foundations	Excavated material exposed to rainfall
Stockpiling of topsoil and fill	Wind and water erosion of stockpiles
Construction of roads and parking areas	Exposed subgrade and disturbed drainage patterns
Drainage installation	Temporary diversion of stormwater flows
Material handling and storage	Sediment generation from disturbed surfaces
Vehicle movements on unpaved surfaces	Dust generation and sediment tracking onto public roads
Dewatering of excavations	Discharge of sediment-laden water if uncontrolled
Concrete works	Potential contamination of runoff from wash water and fine materials
Landscaping	Temporary soil exposure until vegetation is established

Activity	Potential Source of Erosion and Sediment
Removal of temporary facilities	Localized soil disturbance
Final grading	Potential erosion until permanent stabilization is achieved
Revegetation	Establishment of permanent erosion protection through vegetation
Rehabilitation of disturbed areas	Long-term stabilization of soils and drainage pathways

6. KEY RISKS AND IMPACTS

Erosion and sediment impacts will occur primarily during the pre-construction (demolition) and construction phases, and may include:

- Site clearing, vegetation removal, excavation, grading, and earthworks expose soil to rainfall and wind erosion, potentially resulting in the loss of fertile topsoil, reduced soil stability, increased dust generation, and degradation of land required for landscaping and rehabilitation.
- Eroded soil may be transported by stormwater runoff into drainage channels, stormwater infrastructure, wetlands, ponds, coastal waters, and other receiving environments; sediment accumulation can reduce drainage capacity, degrade water quality, increase turbidity, and adversely affect aquatic habitats and ecosystem functions.
- Temporary removal of vegetation, soil compaction, and modification of natural drainage patterns during construction may increase the volume and velocity of stormwater runoff, accelerating erosion, overwhelming drainage systems, transporting sediment off-site, and contributing to localized flooding during rainfall events.
- Sediment, mud, and dust generated by construction activities may be deposited on adjacent roads, neighboring properties, and public infrastructure through runoff or vehicle tracking, creating road safety hazards, reducing visibility, increasing maintenance requirements, and affecting the amenity of surrounding communities.
- Uncontrolled erosion and sediment transport may adversely affect nearby environmentally sensitive receptors, including wetlands, coastal waters, drainage channels, vegetation, and groundwater recharge areas, with potential impacts including habitat degradation, reduced water quality, sediment deposition, and disruption of ecological processes.

7. MANAGEMENT MEASURES

The project shall adopt and implement the following best-practice measures to address the risks and impacts described in Section 5.

7.1 SOIL EROSION AND LOSS OF TOPSOIL

- Minimize the area and duration of exposed soil through staged construction and progressive stabilization.
- Limit vegetation clearing to areas required for immediate construction activities.
- Clearly delineate disturbance limits prior to commencement of works.
- Strip, stockpile, and protect topsoil separately for reuse during rehabilitation.
- Stabilize disturbed areas as soon as practicable using vegetation, mulch, erosion control blankets, or temporary cover.
- Schedule major earthworks outside periods of forecast heavy rainfall where practicable.
- Minimize unnecessary vehicle movements on exposed soils.

7.2 SEDIMENTATION OF DRAINAGE SYSTEMS AND RECEIVING WATERS

- Install erosion and sediment controls prior to commencing earthworks.
- Install silt fences, sediment barriers, sediment traps, or sediment basins as appropriate to site conditions.
- Protect existing drainage channels from sediment entry.
- Divert clean runoff away from disturbed areas where practicable.
- Treat sediment-laden water prior to discharge.
- Inspect and maintain sediment controls following rainfall events.
- Prevent direct discharge of untreated runoff to wetlands or coastal waters.

7.3 INCREASED STORMWATER RUNOFF AND LOCALIZED FLOODING

- Maintain natural drainage patterns where practicable.
- Construct temporary drainage channels and diversion berms to safely convey runoff.
- Install temporary check dams where necessary to reduce runoff velocity.
- Ensure drainage infrastructure remains free of sediment and debris.
- Avoid stockpiling materials within drainage pathways.
- Prepare the site for forecast storm events, particularly during hurricane season, consistent with Annex I (Disaster and Climate Change Risk Assessment Guidance).
- Maintain adequate stormwater conveyance capacity throughout construction.

7.4 OFF-SITE SEDIMENT DEPOSITION AND NUISANCE

- Install stabilized construction entrances to minimize tracking of mud onto public roads.

- Install wheel-wash facilities where necessary.
- Sweep public roads as required to remove soil and sediment deposited by construction traffic.
- Cover trucks transporting soil or loose materials.
- Apply water or other approved dust suppression measures during dry conditions.
- Store fine materials in designated protected areas.
- Maintain good housekeeping throughout the site.

7.5 DEGRADATION OF ENVIRONMENTALLY SENSITIVE RECEPTORS

- Establish buffer zones around wetlands, drainage channels, and coastal environments.
- Prevent construction activities within designated protection zones unless approved.
- Monitor runoff quality where sensitive receptors may be affected.
- Prevent stockpiling of soil or construction materials adjacent to watercourses or drainage systems.
- Restore disturbed areas as soon as practicable.
- Immediately implement corrective measures where sediment releases are observed.

8. DOCUMENTATION AND MONITORING

Evidence of this Plan's implementation shall be documented and retained to demonstrate compliance, in both physical and digital form (including native and scanned files, and photography where appropriate), including but not limited to:

- Daily and weekly inspection reports (with photographs) of erosion and sediment control implementation.
- Inspection of all erosion and sediment controls before forecast major rainfall events.
- Routine maintenance records for erosion and sediment control measures.
- Records of sediment removal from traps, basins, and drainage systems.
- Corrective Action Register.
- Register of community complaints related to erosion, sediment, or stormwater management.
- Project personnel erosion and sediment awareness training records.
- Monthly / quarterly compliance reports.

Monitoring shall adopt an adaptive management approach whereby mitigation measures are modified where inspections indicate recurring erosion, sediment releases, or ineffective controls.

9. KEY PERFORMANCE INDICATORS

The following KPIs will be used to determine whether this Plan has been effectively implemented. Based on the level of compliance with these indicators, MOHLR and the Contractor can identify whether changes or additional improvement measures are necessary.

Impact	KPI	Target	Frequency
Sedimentation of drainage systems and receiving waters	Sediment control measures functioning effectively	≥95% of installed controls fully functional	Weekly
Sedimentation of drainage systems and receiving waters	Sediment releases to receiving waters	Zero uncontrolled sediment discharges	Continuous
Sedimentation of drainage systems and receiving waters	Sediment accumulation in drainage systems	No drainage obstruction attributable to the project	Monthly and after rainfall events
Off-site sediment deposition and nuisance	Public roads free of mud and sediment	≥95% compliant inspections	Daily during earthworks; weekly otherwise
Off-site sediment deposition and nuisance	Complaints regarding sediment, mud, or dust	≤2 substantiated complaints per month	Monthly
Off-site sediment deposition and nuisance	Trucks transporting loose materials covered	100% compliance	Daily
Degradation of environmentally sensitive receptors	Sediment controls protecting sensitive receptors	100% installed and maintained where required	Weekly
Degradation of environmentally sensitive receptors	Environmental incidents affecting sensitive receptors	Zero significant incidents	Continuous
Overall Plan implementation	Weekly erosion and sediment inspections completed	100% completed as scheduled	Weekly
Overall Plan implementation	Corrective actions completed by agreed due date	100% completed within agreed timeframe	Monthly
Overall Plan implementation	Personnel completing environmental awareness training	100% of relevant personnel	Prior to commencing work and annually

Impact	KPI	Target	Frequency
			thereafter

10. REPORTING

Contractors are required to report to the (Contractor) EHS Manager:

- Weekly inspection reports.
- Monthly Environmental Monitoring Reports summarizing: inspection findings; monitoring results; maintenance activities; incidents and non-conformances; corrective actions implemented and closed within the due date; and community complaints.

Under the IDB ESPF and ESPS 1, Plan implementation shall be included in the project's regular Environmental and Social monitoring reports (typically quarterly during construction, unless otherwise agreed with the IDB). Reporting shall include:

- Status of Plan implementation.
- Results of inspections and monitoring.
- Compliance with erosion and sediment control requirements.
- Summary of incidents, complaints, and non-conformances.
- Corrective and preventive actions implemented.
- Outstanding actions and recommendations.
- Photographic evidence where appropriate.

Reporting Activity	Frequency	Responsible
Routine erosion and sediment inspections	Weekly	Contractor
Formal review of the Plan	Every six months or following significant changes	Contractor / Supervision Consultant
Erosion and sediment monitoring	Monthly	Contractor
Community complaint reports	Weekly	Contractor / Community Liaison Officer
Environmental and Social monitoring report to IDB	Quarterly (or as agreed with the IDB)	MOHLR

> *Community complaints regarding erosion, sediment, or drainage shall be received and addressed through the Program Grievance Mechanism (Annex N).*

11. REVIEW AND UPDATE

This Plan shall be treated as a living document and reviewed throughout each project to ensure continued effectiveness. The (Contractor) EHS Manager shall review and update the Plan annually or in response to significant changes, monitoring results, or design changes, including:

- Prior to commencement of demolition, construction, operation, or closure phases.
- Before major changes in construction methods or sequencing.
- Following recurring community complaints relating to sediment, runoff, or drainage issues.
- Following the identification of significant findings and/or deficiencies after inspection or audits — in which case: investigate the root cause; implement corrective and preventive actions; assign responsibilities and completion dates; and verify effectiveness following implementation.

The review process shall evaluate:

- Effectiveness of erosion and sediment controls.
- Inspection and monitoring results.
- Trends in incidents and complaints.
- Contractor compliance.
- Effectiveness of corrective actions.
- Opportunities to improve erosion prevention through adaptative management and lessons learnt from monitoring and experience.

Annex G

Community Health and Safety Framework

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

1 INTRODUCTION AND SCOPE

1.1 INTRODUCTION

This Community Health and Safety Framework (CHSF) has been prepared for the Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064) (the Program), financed by the IDB and executed by the Ministry of Housing, Land, and Urban Renewal (MOHLR), which comprises housing redevelopment projects to be identified and confirmed during Program implementation.

The CHSF has been prepared in accordance with the requirements of Environmental and Social Performance Standard 4 (ESPS 4): Community Health and Safety of the IDB's ESPF and applicable legislation of the Government of the Bahamas.

The CHSF is required because the Project includes activities that may pose risks to surrounding communities, including the demolition of deteriorated residential buildings, the identification, removal, transport, and disposal of hazardous building materials, the relocation of affected households, and the construction of new climate-resilient affordable housing. These activities may give rise to community health and safety risks related to structural instability, hazardous materials, construction traffic, worker–community interactions, security arrangements, impacts on vulnerable groups, disruption of essential services, natural hazards and climate-related events, and the management of personal information collected during the census, relocation, and grievance management processes.

This CHSF provides the framework, measures, procedures, roles, and responsibilities that the MOHLR, the Project Implementation Unit (PIU), contractors, and other implementing entities shall apply to avoid, minimize, mitigate, and monitor risks to the health, safety, and well-being of communities within the Project's area of influence throughout the Project lifecycle.

The CHSF shall be used in conjunction with, and provide guidance for the preparation of, the Environmental and Social Management Plan (ESMP), Occupational Health and Safety Plan (OHSP), Traffic Management Plan (TMP), Emergency Preparedness and Response Plan (EPRP), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and other relevant environmental and social management instruments prepared for the Project.

For the purposes of this Framework, references to "the Project" mean the Program and/or any project financed under it, and references to "the Plan" mean the community health and safety requirements established herein, to be implemented for each project through a site-specific Community Health and Safety Management Plan (CHSMP) prepared in accordance with the Project Screening and Preparation of Site-Specific CHSMPs section below.

1.2 SCOPE

This Framework provides the basis for addressing community health and safety risks associated with all pre-construction, demolition, hazardous materials removal, site clearance, relocation-support, and construction activities financed under the Program, at each project site, and all Program-related activities that may affect surrounding communities.

It is intended to guide the preparation of site-specific Community Health and Safety Management Plans (CHSMPs). It covers the pre-construction phase, the demolition and site clearance phase, the construction phase, and the operational phase of the completed housing units at each project.

2 OBJECTIVES

- Anticipate and avoid adverse risks and impacts on the health and safety of the Project-affected community arising throughout the Project life cycle.
- Avoid or minimize community and worker exposure to asbestos-containing materials (ACMs), polychlorinated biphenyls (PCBs), lead-based paint, and other hazardous substances identified or suspected at project sites, during demolition, rehabilitation and site clearance.
- Ensure the safety of the community is given due consideration in design, construction, and equipment, including the safety of people with disabilities, children, older people, and other vulnerable groups.
- Avoid or minimize the potential for community exposure to communicable diseases associated with Project activities, including those potentially exacerbated by an influx of workers.
- Ensure appropriate emergency preparedness and response measures are in place for foreseeable emergency situations that could affect Project-affected communities.
- Ensure that the provision of security personnel does not pose risks to community members and is provided in a manner consistent with applicable law and good international practice.
- Identify and manage digital-related risks to the community arising from Program activities, including surveillance, data misuse, use of Artificial Intelligence in welfare-related systems, cyber-insecurity, and censorship.

3 PROJECT SCREENING AND PREPARATION OF SITE-SPECIFIC CHSMPS

As specific projects under the Program are identified during implementation, the following process shall be applied to ensure community health and safety risks are appropriately assessed and managed:

- **Screening:** Prior to mobilization, each project shall be screened to identify its location, scope of works (e.g., demolition, new construction, rehabilitation), proximity to surrounding communities, presence of vulnerable groups, and associated community health and safety hazards, including the potential presence of hazardous building materials and site-specific traffic, security, and emergency considerations.
- **CHSMP preparation:** Based on the screening results, a site-specific Community Health and Safety Management Plan (CHSMP) shall be prepared for the project, applying the roles and responsibilities, risk management measures, and monitoring and reporting arrangements established in this Framework, tailored to the project's specific activities, site conditions, and surrounding community context.
- **Review and approval:** Each project CHSMP shall be reviewed and approved by the MOHLR prior to mobilization or commencement of works.
- **Update:** The project CHSMP shall be reviewed and updated where the scope of works, site conditions, or surrounding community context changes materially, or following any significant community health, safety, or security incident.
- **Consistency:** Project CHSMPs shall be at least as stringent as this Framework, and shall comply with applicable national legislation, the IDB Environmental and Social Policy Framework (ESPF) and Environmental and Social Performance Standards (ESPS), including ESPS 4: Community Health and Safety.

The requirements set out in the remainder of this Framework (including roles and responsibilities, community health and safety risks and impacts, management measures, documentation and reporting, key performance indicators, and review and update procedures) constitute the minimum standards to be incorporated into each project-specific CHSMP.

4 ROLES AND RESPONSABILITIES

Unit / Role	Responsibilities
MOHLR (Executing Agency)	Overall responsibility for oversight of the CHSMP implementation; ensuring adequate resources for its implementation; supervising Contractor compliance; coordinating with local authorities, emergency services, and utility providers; overseeing the management and reporting of significant community health and safety incidents.
Community Liaison Officer (CLO) - Contractor	Serve as the primary point of contact between the Project and affected communities; support implementation of the CHSMP; coordinate community notifications prior to demolition and construction activities; organize community meetings; receive and facilitate resolution of community concerns; support emergency communications; maintain records of stakeholder engagement activities.

Unit / Role	Responsibilities
Contractor / Environmental and HSE Team	Day-to-day implementation of all mitigation measures associated with hazardous materials management; worksite fencing, signage, and lighting; traffic control; incident reporting; community notification for planned disruptions.
Social and Environmental Supervision Specialists	Independent verification of CHSMP implementation; review of incident and monitoring reports; community liaison and feedback integration; coordination with CLOs engaged under the SEP.
Security Providers	Implementation of security protocols consistent with the Security Risk Assessment, Voluntary Principles, and this CHSMP Section 6.10; security incidents reporting.
Gender/SEA-SH Specialist (per SEA/SH Plan)	Oversight of SEA/SH prevention and response measures; liaison with women's community groups and affected-community members.
Digital/Data Protection Focal Point	Review of any Project digital tool involving community or worker personal/biometric data; oversight of data protection impact assessments; review of AI tools for transparency and contestability; coordination on cybersecurity controls.

5 COMMUNITY HEALTH AND SAFETY RISKS AND IMPACTS

This section identifies the principal community health and safety risks and impacts that may arise during the pre-construction, demolition, rehabilitation, construction, relocation, and early operational phases of the Project. These risks have been identified based on the Project activities, site conditions, and surrounding community context, and form the basis for the mitigation measures established in this CHSMP:

- Deteriorated condition of structures poses an imminent risk of collapse or injury to occupants.
- Fire hazards associated with demolition activities, the temporary use of deteriorated structures at relocation sites (where applicable), and the construction and early operational phases.
- Traffic increase and road safety issues
- Worksite hazards / public access to construction areas
- Potential asbestos-containing materials, PCB-containing pole-mounted transformers
- Expose community to wastewater or contaminate groundwater
- Increase transmission risk of communicable diseases due to influx of workers and project activities.
- Sexual exploitation, abuse, or harassment due to workers -community interactions.
- Disruption to utilities/services and structural safety
- Community exposure to air emissions, noise, and vibration
- Impacts on ecosystem services affecting community health and safety

- Digital risks at Program level (data misuse, surveillance, Artificial Intelligence and Automated Decision-Making, cyber insecurity, censorship)
- Potential use of force, intimidation, and other inappropriate conduct by security personnel affecting workers, community members, or visitors.

6 MANAGEMENT MEASURES

To address the community health, safety, and security risks identified in Section 5, the Project will implement the management measures presented below. These measures are applied throughout the Project lifecycle, with specific requirements tailored to each Project phase and activity, as appropriate.

6.1 PHYSICAL HAZARD CONTROL, STRUCTURAL SAFETY AND DEMOLITION RISK MANAGEMENT

- Continuous perimeter fencing with a minimum height of 2 meters, appropriate signage in English and other languages relevant to the local community (e.g., Haitian Creole where applicable), and adequate nighttime lighting shall be maintained at all active worksites, excavations, and material storage areas throughout the construction period.
- Access points to worksites shall be staffed during working hours and secured outside working hours, with clear emergency contact information displayed externally.
- Community information and awareness sessions on worksite hazards, covering the risks of unauthorized entry, the location of worksite boundaries, and how to report concerns, shall be conducted prior to mobilization at each site, with specific sessions targeting schools and youth programs in adjacent areas.
- Daily housekeeping, including removal of loose debris and progressive reinstatement of disturbed pedestrian and road surfaces, to minimize community exposure to worksite hazards.
- A structural risk assessment of all buildings to be demolished shall be completed, with findings shared with local authorities where an imminent risk is identified.
- Exclusion zones with perimeter fencing, signage, and barriers shall be established around all active demolition areas to protect neighboring residents and passersby from falling debris and uncontrolled structural failure.
- Demolition methodology shall be sequenced to minimize the duration and spatial extent of structural instability, with controlled demolition techniques applied where proximity to occupied properties requires them.
- Prior to occupancy, all rehabilitated and newly constructed residential buildings shall undergo a Life and Fire Safety inspection to verify that fire protection measures, means of egress, emergency access, and life safety provisions are complete, functional, and suitable for safe occupancy. Electrical installations shall be inspected and tested prior to occupancy to verify compliance with applicable safety requirements and to minimize fire and electrocution risks.
- Prior to occupancy, residents shall receive information on basic fire safety measures, emergency procedures, emergency contact numbers, evacuation routes (where applicable), and the safe use of electrical and other housing services.

6.2 AIR QUALITY (DUST AND EMISSIONS), NOISE AND VIBRATION

Environmental aspects such as air emissions, dust, noise, and vibration will be managed through the Pollution Prevention Plan. This CHSMP complements the Environmental Management Plan by establishing measures to protect nearby communities through communication, advance notification, complaint management, monitoring of community concerns, and adaptive management where Project activities may affect community health and well-being.

- Residents shall be notified in advance of demolition activities or other works expected to generate elevated noise, vibration, or dust levels.
- Effective communication channels shall be maintained to receive and respond promptly to community concerns and grievances related to dust, noise, vibration, or other Project nuisances. The community grievances related to air quality, noise, or vibration shall be recorded through the Project Grievance Mechanism, investigated, and addressed in coordination with the Environmental Management Plan.
- Where monitoring or community feedback indicates that Project activities are causing unacceptable nuisance to nearby residents, additional mitigation measures shall be implemented in coordination with the Environmental Management Plan.

6.3 HAZARDOUS LEGACY MATERIALS MANAGEMENT

- A pre-demolition/pre-rehabilitation hazardous materials survey covering asbestos-containing materials, PCB-containing equipment, and other legacy contaminants shall be conducted by qualified professionals prior to issuing the bidding documents to ensure that identified hazardous materials management requirements are incorporated into the project design, technical specifications, and cost estimates. The findings shall be reviewed and, where necessary, updated prior to demolition, site clearance, or rehabilitation works to account for any changes in site conditions and to confirm that the required hazardous materials management measures are in place.
- Design-Build procurement, the Contractor shall conduct a pre-demolition/pre-rehabilitation hazardous materials assessment/survey covering asbestos-containing materials, PCB-containing equipment, and other legacy contaminants as part of the Contractor’s Environmental and Social Management Plan (C-ESMP) and prior to any demolition or site clearance activities.
- Community shall be notified in advance of any hazardous materials removal operation.
- If hazardous materials are identified, dust suppression measures (water misting, sealed demolition equipment, debris containment) shall be applied at all demolition faces adjacent to occupied residential properties to limit community exposure to demolition dust and any residual hazardous particulates.

6.4 TRAFFIC AND ROAD SAFETY

Traffic-related community risks shall be managed through the Project's dedicated Traffic Management Plan (TMP), which shall be implemented in conjunction with this CHSMP and forms part of the Contractor's contractual obligations. Key measures include:

- Signposted detours and advance community notification prior to any road closure or access restriction affecting neighborhood streets.
- Flag persons and traffic controllers’ position at all active worksite access points and at intersections with principal pedestrian routes.

- Speed restrictions on all construction vehicle routes through the residential area, enforced through physical measures (speed humps or chicanes at site access points) in addition to signage.
- School-zone protection protocols, including prohibition of heavy vehicle movements on routes adjacent to schools during arrival and dismissal periods, and a dedicated pedestrian passage always maintained.
- Scheduling of peak demolition debris and construction material transport outside peak community activity hours, coordinated with residents and commercial establishments.
- Monthly road safety monitoring along construction vehicle routes, with incident data reported to MOHLR.

6.5 COMMUNICABLE DISEASE PREVENTION

- Workforce health screening at mobilization, as legally permissible and consistent with applicable confidentiality standards, to prevent the introduction of communicable diseases into the community.
- Adequate hygiene and sanitation facilities maintained on-site throughout the construction period, including handwashing and toilet facilities in numbers and condition consistent with applicable workforce health standards.
- Information, education, and communication (IEC) materials on communicable disease prevention distributed to workers and made available to the surrounding community through neighborhood notice points and the Project's community engagement channels.
- Vector control measures (elimination of standing water, management of waste accumulation) applied within and immediately adjacent to all worksites.
- Coordination with local public health authorities in the project locality on any emerging communicable disease risk associated with Project activities.

6.6 ECOSYSTEM SERVICES AND GREEN SPACE

- Green areas, shade trees, drainage features, and other ecosystem services that contribute to community health and safety (e.g., heat mitigation, stormwater management, erosion control, and pedestrian comfort) shall be protected or restored, where feasible, during Project implementation. Detailed vegetation management and landscaping measures are addressed in the ESMP.

6.7 GENDER-BASED VIOLENCE AND SEA/SH PREVENTION

Risks of Sexual Exploitation, Abuse, and Harassment (SEA/SH) arising from worker-community interaction shall be managed in accordance with the Annex M SEA/SH Prevention and Response. .Community-facing measures include:

- All Contractor personnel shall sign and comply with the Program Code of Conduct, which includes a zero-tolerance policy on SEA/SH and always requires respectful conduct toward community members. Additionally, the personnel should provide in the labor induction the topics associated with prevention SEA/SH.
- Community information and awareness sessions prior to mobilization at each site shall include information on the Code of Conduct, the prohibition on SEA/SH, and accessible reporting channels, with specific sessions for women's groups and youth.

- Worksite lighting and access management measures shall be designed and maintained with attention to the safety of women and girls in the surrounding neighborhood during and after working hours.
- A dedicated, confidential SEA/SH reporting channel is maintained for community members separately from the general Project GRM, according to the SEA/SH Prevention and Response Plan.

6.8 EMERGENCY PREPAREDNESS AND RESPONSE

- Emergency Preparation and Response Plan shall be prepared for the Project sites covering fire, traffic accidents, structural collapse, flooding, and medical emergencies, with clear procedures for community notification.
- Coordination protocols shall be established with local emergency services, health facilities, and civil protection authorities in the project locality before mobilization.
- Emergency contact information and procedures shall be posted in English and other languages relevant to the local community (e.g., Haitian Creole where applicable) at all worksite perimeter access points, in a format visible to the public.
- Community notification procedures shall be activated within one hour of any emergency originating from Project activities and affecting or potentially affecting neighboring residents.
- According to the EPRP, emergency drills shall be conducted with participation records maintained and community representatives invited where appropriate. In addition, for hurricane and tropical storm scenarios, the EPRP shall include procedures for timely community notification of any Project-related risks and protective measures associated with the event.

6.9 SECURITY PERSONNEL

Where the Project or its Contractors engage private or public security personnel, this CHSMP incorporates the security management measures defined, including:

- Background screening of all security personnel prior to deployment.
- Training on the use-of-force continuum and the Voluntary Principles on Security and Human Rights, prior to deployment and refreshed semi-annually.
- Restrictions on the use of firearms in community-facing roles.
- Posting of clear rules-of-conduct for security personnel at all public-facing worksite access points, in English and other languages relevant to the local community (e.g., Haitian Creole where applicable).
- A clear protocol for reporting security-related incidents through the Project reports to BID and access in the Grievance Mechanism.

6.10 DIGITAL-RELATED RISKS

For digital tools or data systems in connection with Project activities (biometric or geospatial data collection, CCTV or access-control systems at worksites, digital platforms for beneficiary registration or compensation payments or grievance-triage tools), associated community health, safety, and security risks shall be managed through the following measures:

- A data protection impact assessment shall be conducted before deploying any digital tool that collects personal or biometric data from community members or workers.

- Data collection shall be limited to what is necessary and proportionate for the stated purpose; affected persons shall receive informed consent information and accessible non-digital alternatives.
- Grievance-triage tool shall be subject to meaningful human review and an accessible channel for affected persons to contest automated decisions.
- Appropriate cybersecurity controls (access restriction, encryption, defined data-retention periods) shall be applied to all Project databases containing community or worker personal data.
- Project digital systems should not be used to monitor, restrict, or retaliate against community members for raising concerns or participating in consultation.

These measures are coordinated with the Stakeholder Engagement Plan and, where personal data of potentially affected persons is involved, with the Resettlement Action.

7 DOCUMENTATION AND REPORTING

- Monthly CHSMP compliance inspections by the Contractor's HSE team, with findings verified by the Supervision team through independent periodic inspections.
- Incident and accident register maintained for all community-related health, safety, and security events across all project sites, including near-misses, structural observations, hazardous materials incidents, and traffic events.
- Air quality, Noise and vibration monitoring at sensitive community receptors (occupied residences, schools, places of worship), at least monthly during active demolition and construction, with results disclosed publicly.
- Community-related incidents classified by severity; mandatory notification to MOHLR and the IDB for any fatality, serious injury, or SEA/SH allegation within 24 hours of detection.
- All community concerns and complaints channeled through the Project Grievance Redress Mechanism (SEP), with a dedicated confidential pathway for SEA/SH-related complaints.
- Data breach, unauthorized surveillance, or censorship incidents reported to MOHLR and the IDB within 24 hours of detection.

7.1 KEY PERFORMANCE INDICATORS (KPIS)

The following indicators will be used to monitor CHSMP implementation and community health and safety outcomes throughout the Project:

Topic	Indicator	Unit	Frequency
Structural & Demolition Safety	Number of community health or safety incidents linked to construction and demolition activities (near misses, injuries, structural events)	Number	Monthly
Traffic & Road Safety	Number of road traffic accidents around influence linked to Project activities involve community members or external stakeholders	Number	Monthly

Topic	Indicator	Unit	Frequency
Noise & Vibration Dust & Air Quality Utility Disruption Water & Wastewater	Number of community health and safety grievances.	Number	Monthly
Communicable Disease	Percentage of workforce completing health screening at mobilization	%	Quarterly
SEA/SH	Number of reported SEA/SH allegations	Number	Monthly
Security	Number of reported security-related incidents involving use of force or misconduct toward community members or workforce.	Number	Monthly
Digital Risk	Number of reported data breaches, unauthorized surveillance, or censorship incidents	Number	As occurs (24h report)

8 REVIEW AND UPDATE

This CHSMP is a living document and shall be reviewed before the start of construction at each Project site, and updated whenever there are material changes in scope, location, community context, or following any significant community health, safety, or security incident. Results of community consultations and grievance feedback shall be considered in each review cycle.

9 IMPLEMENTATION SCHEDULE

Activity	Phase	Timing / Frequency
Life and Fire Safety (L&FS) review, verification and inspections	Design / Pre-construction/ Construction/Demolition/Operation	Prior to construction and before occupancy
Hazardous materials survey	Pre-demolition / pre-rehabilitation	Prior to demolition at each site Prior to rehabilitation activities, where applicable
Community awareness campaigns (worksite hazards, Code of Conduct, reporting channels)	Pre-construction	Prior to mobilization at each site; refreshed annually
Worksite fencing, signage, lighting installation	Pre-construction / Construction	Prior to and maintained throughout active works
First community drill	Pre-construction	Prior to mobilization at each site
Noise and vibration monitoring	Construction/Demolition	During active construction and demolition.

Annex H.1

Traffic Management Plan (TMP) Guidance Document

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

> *Annex H combines the Traffic Management Plan (H.1) and the Emergency Preparedness and Response Plan (H.2)*

1. INTRODUCTION AND SCOPE

1.1 INTRODUCTION

This Traffic Management Plan (TMP) Guidance Document provides guidance for the preparation of project-specific Traffic Management Plans for projects financed under the Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064).

The Guidance provides a framework for identifying, assessing, and managing traffic and road safety risks and impacts associated with project activities, particularly the movement of workers, vehicles, equipment, construction materials, fuels, waste, and other loads to and from project sites. It also addresses potential impacts on pedestrians, cyclists, motorcyclists, public transport users, local communities, and other road users within a project's Area of Influence.

The Guidance is intended to support MOHLR and project teams in preparing and reviewing project-specific TMPs and to assist contractors and other relevant parties in implementing the traffic management measures established in those Plans. The project-specific TMP should be adapted to the nature, scale, location, traffic conditions, and potential environmental and social risks and impacts of each project.

1.2 SCOPE

This Guidance applies to the preparation of project-specific Traffic Management Plans for all project-related traffic activities throughout the project lifecycle, including pre-construction/mobilization, construction, operation (where applicable), and closure/demobilization and site rehabilitation, consistent with the phases described in the ESMF. The project-specific TMP should cover all project personnel, contractors, subcontractors, suppliers, and visitors whose activities involve the operation or movement of vehicles and mobile equipment associated with the project.

Specifically, the project-specific TMP should address, as applicable:

- All project vehicles, mobile plant, heavy equipment, and contractor and supplier vehicles used for project purposes.
- The transportation of personnel, equipment, materials, fuels, chemicals, waste, and oversized or hazardous loads associated with the project.
- All project access roads, temporary roads, site entrances and exits, laydown areas, loading and unloading zones, parking areas, and any public roads used by project traffic within the project's Area of Influence.
- Traffic interactions between project vehicles and other road users, including pedestrians, cyclists, motorcyclists, public transport, and, where relevant, livestock and wildlife.
- Traffic management measures at work sites and interfaces with public roads, including signage, speed control, temporary traffic control, and safe access arrangements.
- Measures to manage traffic-related environmental and social impacts, including noise, vibration, dust, emissions, congestion, road deterioration, and community disturbance.
- Coordination with relevant government authorities, emergency services, and affected communities regarding traffic management, road safety, and temporary traffic disruptions.
- Monitoring, inspection, incident reporting and investigation, corrective actions, and periodic review of traffic management performance to ensure continual improvement and compliance with applicable legal requirements and the IDB ESPF and ESPS.

This project specific TMP shall be implemented in conjunction with the following Project management plans, as applicable. It should be noted that guidance and framework documents are included in the other Annexes of the ESMF for their preparation and are listed here for convenience:

- (Annex H.2) Emergency Preparedness and Response Plan
- (Annex E) Occupational Health and Safety
- (Annex G) Community, Health and Safety Plan
- (Annex N) Stakeholder Engagement Plan

2. OBJECTIVES

The objectives of a project-specific Traffic Management Plan (TMP) are to identify, assess, and manage traffic-related risks and impacts associated with project activities in order to protect the health and safety of workers, road users, and affected communities; maintain safe and efficient traffic flow; minimize disruption to local transportation networks; and ensure compliance with applicable national regulations and the requirements of the IDB Environmental and Social Policy Framework and Environmental and Social Performance Standards.

This project-specific TMP should present strategies and measures to mitigate potential traffic and safety risks associated with the transportation of construction materials and other activities affecting populations within a project's Area of Influence.

The measures established in the TMP are intended to:

- Provide a safe environment for project drivers, passengers, pedestrians, workers, local communities, and wildlife within the project's Area of Influence.
- Establish requirements for traffic routing, access to project sites, and the safe movement of project vehicles and equipment.
- Identify and implement preventive and mitigation measures to avoid, reduce, and manage traffic accidents, road safety risks, and disturbances to nearby communities.
- Minimize damage and deterioration to public roads and other transport infrastructure resulting from project-related traffic.
- Minimize traffic-related environmental impacts, including noise, vibration, dust, and vehicle emissions, through appropriate traffic management and operational controls.

A standalone project-specific TMP shall be prepared where screening identifies material traffic or road-safety risks, including heavy-vehicle movements, road closures, traffic diversions, hazardous or oversized loads, school-zone exposure, constrained access routes, material pedestrian risks, or significant community disruption. For lower-risk activities, proportionate traffic-management measures may be incorporated directly into the ESMP or Annex C requirements.

3. ROLES AND RESPONSIBILITIES

MOHLR is responsible for ensuring that employees, contractors, and subcontractors implement these TMP's policies and procedures, aligned with international requirements and best practice. Contractors shall implement the practices established in this Plan and shall establish detailed procedures to apply the management practices on the ground. MOHLR shall review and approve project-specific application of this TMP prior to implementation.

Role	Responsibilities
MOHLR	Review and approve the TMP for each project; ensure the availability of resources necessary for its implementation.
Project Manager (PIU)	Overall responsibility for effective TMP implementation, including: providing adequate resources; ensuring traffic management requirements are integrated into project planning and scheduling; ensuring contractors comply with the TMP and contractual requirements; supporting corrective actions following inspections, audits, or incidents; and liaising with regulatory authorities and MOHLR on significant traffic-related matters.
EHS Manager (Contractor)	Overseeing implementation and monitoring, including: developing, maintaining, and periodically reviewing the TMP at project level; conducting traffic risk assessments and identifying control measures; monitoring compliance through inspections and audits; investigating traffic incidents and near misses and ensuring corrective actions; delivering or coordinating traffic safety awareness and training; and reporting traffic performance and incidents to the PIU.
Construction / Site Manager	Implementing the TMP in the field, including: planning site activities to minimize traffic risks; ensuring traffic control measures, signage, barriers, and designated routes are in place and maintained; coordinating vehicle movements and deliveries; suspending activities where traffic conditions present unacceptable risks; and ensuring site personnel comply with traffic management requirements.
Vehicle drivers and equipment operators	Holding valid licenses and required certifications; conducting pre-use vehicle inspections; complying with speed limits, designated routes, and traffic controls; wearing seat belts and ensuring passengers do the same; avoiding distracted or impaired driving; immediately reporting vehicle defects, incidents, near misses, and unsafe road conditions; and driving defensively, exercising particular caution around pedestrians, schools, communities, and, where relevant, livestock and wildlife.
Project workers	Complying with the Code of Conduct (Annex D-1); following designated pedestrian routes and traffic controls; reporting unsafe traffic conditions; participating in required traffic safety training; and complying with site traffic rules and instructions.
Contractors and subcontractors	Complying with the requirements of the TMP; developing and implementing task-specific traffic management procedures where required; presenting documentary evidence that vehicles are roadworthy and properly maintained; ensuring drivers are competent, medically fit where required, and appropriately trained; and reporting traffic incidents and cooperating in investigations.

4. TRAFFIC-GENERATING ACTIVITIES

Projects will generate traffic on local roads primarily during the pre-construction (demolition) and construction phases, through activities such as worker commuting, mobilization of equipment and machinery to and from the site, demolition of existing structures, removal of demolition debris, construction material deliveries (e.g., concrete), waste collection and transport for disposal, and traffic restrictions arising from utility disconnections/relocations and road maintenance or repair needs.

5. KEY TRAFFIC IMPACTS

Traffic impacts to the community will occur primarily during project construction and include:

- Increased traffic volumes and congestion due to worker commuting, heavy equipment mobilization, material deliveries, waste transport, and future resident, visitor, and service vehicle movements, potentially resulting in delays or reduced road capacity during peak traffic periods.
- Road safety risks from increased interactions between construction vehicles, private vehicles, pedestrians, cyclists, and other vulnerable road users, resulting in a higher potential for traffic accidents, property damage, injury, or mortality.
- Temporary disruption to local access roads, including road closures or traffic restrictions, traffic diversions, restricted access to adjacent properties, impacts on public transport, and potential delays for emergency vehicles.
- Road infrastructure deterioration (pavement), mud and debris on roads, dust and sediment leaving the site (reducing visibility), queuing at site entrances, and parking pressures from construction workers.
- Community nuisance and amenity impacts associated with increased traffic, including noise, vibration, air emissions, and reduced quality of life for nearby residents.

6. TRAFFIC MANAGEMENT MEASURES

The project shall adopt and implement the following best-practice measures to address the traffic and transport impacts described in Section 5.

6.1 INCREASED TRAFFIC VOLUMES AND CONGESTION

- Schedule deliveries and waste haulage outside peak traffic periods where practicable.
- Designate approved haul routes in consultation with local authorities.
- Stagger worker shifts to reduce peak-hour commuting.
- Encourage worker carpooling or provide shuttle buses where feasible.
- Coordinate oversized or high-volume deliveries to minimize disruption.
- Provide adequate on-site loading, unloading, and vehicle queuing areas.

6.2 ROAD SAFETY RISKS

- Implement site-specific traffic control measures, including trained traffic controllers where required.
- Install clear warning signs, speed limits, and directional signage on-site.
- Establish segregated pedestrian walkways and safe crossing points.
- Maintain adequate sight distances at site entrances and exits.
- Require all drivers to complete defensive driving training, prohibit the use of cell phones while driving, and ensure strict compliance with seatbelt use, speed limits, and all traffic signals and regulations.
- Inspect vehicles regularly and ensure drivers are appropriately licensed and trained.
- Establish random and/or for-cause drug and alcohol testing, consistent with applicable laws.
- Require drivers to sign a Code of Conduct establishing driver safety standards and disciplinary measures for noncompliance, consistent with Annex D-1.
- Develop and implement an emergency response procedure for traffic incidents, coordinated with Annex H-2 (Emergency Preparedness and Response Plan).
- Ensure loads are covered at all times

6.3 TEMPORARY DISRUPTION TO LOCAL ACCESS ROADS

- Implement site-specific traffic control measures, including trained traffic controllers where required.
- Install clear warning signs, speed limits, and directional signage.
- Establish segregated pedestrian walkways and safe crossing points.
- Maintain adequate sight distances at site entrances and exits.
- Require all drivers to comply with defensive driving and speed management requirements.
- Inspect vehicles regularly and ensure drivers are appropriately licensed and trained.

- Develop and implement an emergency response procedure for traffic incidents.

6.4 ROAD INFRASTRUCTURE DETERIORATION, MUD, DUST, QUEUING, AND PARKING

- Regularly clean public roads affected by construction traffic.
- Cover haul trucks transporting loose materials.
- Apply dust suppression measures (e.g., water spraying) on unpaved surfaces.
- Repair any project-related damage to public roads in coordination with the relevant authority.
- Provide sufficient on-site parking for workers and contractors.
- Manage site access to prevent vehicle queuing onto public roads.

6.5 COMMUNITY NUISANCE AND AMENITY IMPACTS

- Restrict heavy vehicle movements to approved working hours where practicable.
- Select haul routes that avoid sensitive receptors such as schools, hospitals, and residential streets where feasible.
- Maintain project vehicles and equipment to minimize noise and emissions.
- Minimize unnecessary idling of vehicles while on-site.
- Communicate construction schedules and traffic changes to affected communities, consistent with the project's Stakeholder Engagement Plan.
- Ensure traffic-related complaints can be received and addressed through the Program Grievance Mechanism (Annex N).
    - Ensure project vehicles are numbered and identified as such and include a “how am I driving” sticker with the phone number for the GRM.

7. DOCUMENTATION AND MONITORING

Evidence of TMP implementation shall be documented and retained to demonstrate compliance, in both physical and digital form (including native and scanned files, and photography where appropriate), including but not limited to:

7.1 DRIVER RECORDS

- Contractual requirements and registry of drivers' licenses.
- Records of driver training, testing, and adherence to the Code of Conduct.
- Records of driver incidents or policy violations (e.g., speed limits, other moving violations, drug or alcohol use).

7.2 VEHICLE RECORDS

- Registry of vehicles used, roadworthiness certificates, and evidence of tenure payment/verification; registry of vehicle insurance policies.
- Logbook of vehicle inspections, maintenance, and repair records.

7.3 TRAFFIC MANAGEMENT RECORDS

- Vehicle manifests.
- Records of travel plans for convoys and oversized loads.
- Registry of notifications to affected communities of anticipated project-related traffic.
- Transport plan identifying peak traffic periods and truck delivery schedules, avoiding times of peak pedestrian or road traffic volumes and night-time travel through residential areas.
- Authorizations from relevant authorities for temporary traffic restrictions on public roads or works on public roads.

7.4 ROAD CONDITION RECORDS

- Records of road maintenance/repair needs reported to government authorities.
- Pre-construction road survey and action plan, and post-construction update of road conditions.
- Records of any contracts or agreements regarding cost-sharing between the project and local authorities for road maintenance and repairs.

7.5 STAKEHOLDER ENGAGEMENT RECORDS

- Record of communications with public authorities and community leaders.
- Record of public education events, publications, and meetings, including attendees and comments received.
- Record of road traffic-related grievances and their resolution.

7.6 TRAFFIC EVENTS

- Traffic accident (collisions, fatalities, injuries), incident (breakdowns), and near-miss statistics and investigation reports, including corrective actions and evidence of closure.

8. KEY PERFORMANCE INDICATORS

The following KPIs will be used to determine whether this TMP has been effectively implemented. Based on the level of compliance with these indicators, MOHLR and the Contractor can identify whether changes or additional improvement measures are necessary.

Impact	KPI	Target	Frequency
Increased traffic congestion and disruption to local access roads	Traffic congestion events attributable to project activities	≤ 2 events/month; no recurring congestion without corrective action	Weekly and after complaints
Increased traffic congestion and disruption to local access roads	Heavy vehicle movements outside designated peak traffic periods	≥ 90% compliance	Monthly
Increased traffic congestion and disruption to local access roads	Unplanned road closures	Zero	Weekly
Increased traffic congestion and disruption to local access roads	Planned road closures communicated in advance	100% notified ≥48 hours before implementation	Each occurrence
Road safety risks	Fatalities involving project vehicles	Zero	Continuous; reported immediately
Road safety risks	Traffic accidents involving project vehicles	Zero	Continuous
Road safety risks	Traffic incidents / near misses involving project vehicles	≤ 10 per quarter	Monthly
Road safety risks	All traffic-related events investigated and reported	100% within 48 hours	Monthly
Road safety risks	Compliance with posted speed limits	≥ 95% compliance	Weekly
Road safety risks	Drivers trained in defensive driving	100% before operating project vehicles	Prior to mobilization and quarterly review
Road infrastructure deterioration, mud, dust, and parking	Inspections confirming roads free of mud/debris	≥ 95% compliant inspections	Daily during active earthworks;

Impact	KPI	Target	Frequency
			weekly otherwise
Road infrastructure deterioration, mud, dust, and parking	Unauthorized worker parking incidents	≤ 2 isolated incidents/month; no repeat offenders	Weekly
Community nuisance and amenity	Traffic-related community complaints	≤ 3 substantiated complaints/month	Monthly
Community nuisance and amenity	Traffic-related grievances resolved within the established timeframe	100% resolved within 30 days	Monthly
Community nuisance and amenity	Heavy vehicles operating outside approved hours	Zero unauthorized movements	Monthly

9. REPORTING

Contractors are required to report to the (Contractor) EHS Manager:

- Notifications of planned road closures or traffic diversions, including oversized or abnormal loads.
- Any permit requests submitted and obtained from authorities for temporary traffic control measures, where required.
- Significant traffic events (accidents, incidents, near misses) affecting public roads.
- Any complaint received.
- Any project-related damage to public infrastructure and proposed repairs.
- Updates on implementation of agreed traffic management measures where required by permit conditions.

Under the IDB ESPF and ESPS 1, TMP implementation shall be included in the project's regular Environmental and Social monitoring reports (typically quarterly during construction, unless otherwise agreed with the IDB). Reporting shall include:

- Status of TMP implementation.
- Traffic monitoring results.
- Traffic incidents, near misses, and corrective actions.
- Community traffic-related complaints and their resolution.
- Non-compliances identified during inspections or audits.
- Progress on corrective and preventive actions.
- Any revisions made to the TMP.
- Confirmation of contractor compliance with TMP requirements.
- Any significant traffic-related events requiring notification to the IDB.

Reporting Activity	Frequency	Responsible
Routine TMP inspections	Weekly	Contractor
Formal TMP review	Every six months or following significant changes	Contractor / Supervision Consultant
Traffic monitoring	Monthly	Contractor
Event investigation	Immediately following any event (accidents, incidents, near misses, complaints)	Contractor
Community complaint reports	Weekly	Contractor / Community Liaison Officer

Reporting Activity	Frequency	Responsible
Reports to relevant authorities	As required by permits and for road closures, diversions, incidents, or infrastructure damage	MOHLR
Environmental and Social monitoring report to IDB	Quarterly (or as agreed with the IDB)	MOHLR
Notification of serious events (accidents, incidents, near misses, complaints) to IDB	Promptly after becoming aware, followed by a detailed investigation report	MOHLR

10. REVIEW AND UPDATE

The (Contractor) EHS Manager shall review and update this TMP annually or in response to significant changes, monitoring results, accidents or incidents, or design changes, including:

- Prior to commencement of demolition and construction activities.
- Before each major change in construction activities or traffic patterns (e.g., commencement of bulk earthworks, concrete works, or commissioning).
- Following any traffic event (accident, incident, near miss) or public complaint related to traffic.
- Following significant changes to haul routes, access roads, or construction sequencing.
- Following severe weather events that affect road conditions or traffic management arrangements.

Annex H.2

Emergency Preparedness and Response Framework (EPRF)

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

> *Annex H combines the Traffic Management Plan (H.1) and the Emergency Preparedness and Response Plan (H.2)*

1. INTRODUCTION AND SCOPE

1.1 INTRODUCTION

The Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064) (the Program) is intended to improve housing conditions in The Bahamas through the redevelopment of aging, deteriorated, or vacant residential properties and the provision of safe, affordable, and climate-resilient housing. The Program is executed by the Ministry of Housing, Land, and Urban Renewal (MOHLR).

Individual housing redevelopment sites (projects) financed under the Program will be identified and confirmed during Program implementation. Projects may involve, among other activities:

- Construction of 2-storey housing developments (single or multifamily) and associated infrastructure;
- Demolition and redevelopment of occupied or vacant residential structures in advanced states of deterioration;
- Demolition and redevelopment of vacant deteriorated buildings; and
- Rehabilitation of occupied buildings, which following rehabilitation may serve as permanent or temporary housing for residents displaced during redevelopment of other Program sites.

For the purposes of this Emergency Preparedness and Response Framework (EPRF), references to “the Project” mean the Program and/or any project financed under it, and references to “the Plan” mean the emergency preparedness and response requirements established herein, to be implemented for each project through a site-specific Emergency Preparedness and Response Plan (EPRP) prepared in accordance with the Project Screening and Preparation of Site-Specific EPRPs section below.

1.2 SCOPE OF EPRF

This Framework applies to all activities financed under the Program, including mobilization, pre-construction (including demolition), construction, operation (where applicable), and closure phases of each project. This Framework applies to all Program and project personnel, contractors, subcontractors, suppliers, and visitors undertaking activities on behalf of the Program.

It is important to note that monitoring, inspection, incident reporting and investigation, corrective actions, and periodic review of performance of each EPRP will be carried out to ensure continual improvement and compliance with applicable legal requirements and the IDB ESPF and ESPS.

1.3 OBJECTIVES

The objective of this Emergency Preparedness and Response Framework (EPRF) is to establish the management framework, responsibilities, resources, and response measures necessary to prepare for, respond to, and recover from emergencies that may occur during the demolition, construction, operation, and closure phases of Program projects, and to guide the preparation of site-specific Emergency Preparedness and Response Plans (EPRPs) for each project.

The Plan has been developed to:

- Define responsibilities for emergency preparedness, incident management, evacuation, rescue, and emergency communications.

- Ensure appropriate emergency equipment, trained personnel, and emergency resources are available throughout the Project.
- Minimize disruption to construction activities and reduce potential damage to project assets and surrounding communities.
- Establish procedures for incident reporting, investigation, corrective actions, and continuous improvement.
- Ensure emergency preparedness and response through regular inspections, emergency drills, and training.
- Ensure compliance with applicable legislation of The Bahamas, the Inter-American Development Bank (IDB) Environmental and Social Policy Framework (ESPF), including ESPS1, ESPS2, ESPS3 and ESPS4, and WBG´s EHS Guidelines.

1.4 PROJECT SCREENING AND PREPARATION OF SITE-SPECIFIC EPRPS

As specific projects under the Program are identified during implementation, the following process shall be applied to ensure emergency preparedness and response risks are appropriately assessed and managed:

- **Screening:** Prior to mobilization, each project shall be screened to identify its location, scope of works (e.g., demolition, new construction, rehabilitation), site conditions, proximity to surrounding communities, and associated emergency risks, including exposure to hurricanes, flooding, fire, and other natural or technological hazards relevant to the project site.
- **EPRP preparation:** Based on the screening results, a site-specific EPRP shall be prepared for the project, applying the roles and responsibilities, risk management measures, general emergency protocols, monitoring arrangements and reporting requirements established in this Framework, tailored to the project's specific activities, site conditions, and surrounding community context.
- **Review and approval:** Each project EPRP shall be reviewed and approved by the MOHLR and/or EHS Manager before mobilization or commencement of works.
- **Update:** The project EPRP shall be reviewed and updated where the scope of works changes materially, following significant emergency events, and prior to commencing operation or closure phases, where applicable.
- **Consistency:** Project EPRPs shall be at least as stringent as this Framework, and shall comply with applicable national legislation, the IDB Environmental and Social Policy Framework (ESPF) and Environmental and Social Performance Standards (ESPS), and the World Bank Group's General EHS Guidelines.

The requirements set out in the remainder of this Framework (including roles and responsibilities, typical activities and risks, management measures, general emergency preparedness protocols, documentation, monitoring, key performance indicators, and reporting) constitute the minimum standards to be incorporated into each project-specific EPRP.

Each EPRP shall be implemented in conjunction with the following Project management plans, as applicable. It should be noted that guidance and framework documents are included in the other Annexes of the ESMF for their preparation and are listed here for convenience:

- (Annex F.1) Pollution Prevention and Waste Management Plan
- (Annex F.2) Erosion and Sediment Prevention and Control Management Plan
- (Annex H.1) Traffic Management Plan

- (Annex N) Stakeholder Engagement Plan
- (Annex I) Disaster and Climate Change Risk Assessment

1.5 ROLES AND RESPONSIBILITIES

It is the MOHLR's responsibility to ensure that this Framework's requirements are implemented consistently across all projects, and that project-specific EPRPs are prepared, reviewed and approved in accordance with this Framework. Contractors will implement the practices established in each project's EPRP and will establish detailed procedures to apply the management practices on the ground. In order to properly implement this Framework, the involvement of the people listed below is necessary.

Role	Responsibilities
MOHLR	Review and approve the Plan. Ensure the availability of resources necessary for the implementation of the Plan
Contractor's Project Manager	The Project Manager has overall responsibility for ensuring the effective implementation of the Plan, including: • Providing adequate resources (personnel and equipment) to implement the Plan. • Ensuring contractors comply with the Plan and contractual requirements. • Supporting corrective actions following inspections, audits, or incidents. • Ensuring emergency preparedness and response measures are incorporated into construction planning. • After an emergency give authorization for resuming construction activities
Contractor's EHS Manager	The EHS Manager is responsible for overseeing the implementation and monitoring of the Plan. Specific responsibilities include: • Developing, maintaining, and periodically reviewing the Plan. • Monitoring compliance through inspections and audits, investigations of incidents, and identifying appropriate additional control measures. • Coordinate environmental monitoring; investigate incidents; prepare monitoring reports. • Review and recommend corrective actions. • Liaise with regulatory authorities where required. • Reporting Plan´s performance to project management and IDB.
Construction/ Site Manager	The Construction or Site Manager is responsible for implementing the Plan´s management measures in the field by: • Integrating emergency preparedness and response measures into planned activities. • Supervise the implementation of control measures and ensure that all emergency equipment and personnel are operational on site. • Ensuring site personnel are trained on emergency preparedness and control management requirements.

Role	Responsibilities
	• Investigating emergency incidents to ensure that corrective actions are implemented. • Issue emergency call and suspend work where emergency conditions exist. Inform Project Manager. • Ensure work areas remain accessible for emergency response. After an emergency • Carry out the business continuity and recovery protocol, and • obtain authorization from the Project Manager before resuming construction activities
Contractor's Site supervisors	Conduct daily inspections. Ensure emergency access routes remain unobstructed. Verify emergency equipment is available and operational. Immediately report emergency hazards; ensure personnel understand emergency procedures
Contractor's Emergency Coordinator / Incident Controller	Plan emergency response drills with project´s response teams, emergency services and affected communities. Assume overall control during emergency situations. Assess emergency conditions and activate emergency response procedures when required. Coordinate project emergency response personnel and communicate with emergency services. Authorize evacuation when required and activate community communications protocols (inform the community liaison officer / refer to the Community Health and Safety Management Plan). Maintain incident records and prepare reports.
Contractor's Community liaison officer	Implement the community communications protocols and the Community Health and Safety Management Plan.
Contractor's OHS Officers / Fire Wardens	Implement emergency response drills periodically as planned. Implement the emergency evacuation procedure as directed by Emergency Coordinator. Account for personnel at assembly points and inspect work areas where safe to do so. Report evacuation status to the Emergency Coordinator during emergency events. Report on the effectiveness of evacuation procedures and implement opportunities for improvement
First Aid Coordinator / First Aiders	Participate in the implementation of emergency response drills periodically as planned. Provide immediate first aid within the limits of their training.

Role	Responsibilities
	Coordinate ambulance response. Document and know where to send people to receive additional medical care. Maintain first aid equipment; assist with casualty management until emergency medical services arrive.
Project workers	All project workers shall: • Participate in required emergency response awareness training. • Report emergency response deficiencies or opportunities for improvement are identified. • Comply with relevant procedures and implement emergency response measures.
Subcontractors	Contractors and subcontractors are responsible for: • Complying with the requirements of this Plan. • Training all personnel in relevant emergency preparedness and response aspects. • Developing and implementing task-specific emergency preparedness and response procedures, where required. • Present documentary evidence of implementation of management measures. • Carry out and participate in emergency drills as planned. • Maintain emergency equipment under their control. • Cooperate fully during emergency response activities.

Source: 4CR, 2026

1.6 ACTIVITIES

Project activities have the potential to create emergency situations that require preparedness and response measures. These activities may include, but are not limited to, the following emergency situations.

Project Phase	Activity	Potential risks / events
Pre-construction	Site establishment	Vehicle incidents, utility strikes, fire, severe weather
	Demolition of existing buildings	Structural collapse, asbestos discovery, dust release, falling debris, worker injury, fire.
	Utility disconnections	Electrical shock, gas leaks (if present), service interruption
	Project designs	Designs not considering Life and Fire requirements compliance and certification, and consideration of WBG EHS Guidelines.

Project Phase	Activity	Potential risks / events
	Site clearing and earthworks	Equipment rollover, excavation collapse, flooding, severe weather
	Excavation and trenching	Trench collapse, worker entrapment, underground utility strike
	Foundation works	Equipment incidents, concrete burns, and collapse of temporary works
	Building construction	Falls from height, structural instability, fire, and electrical incidents
	Welding, cutting and hot works	Fire, explosion, burns
	Electrical installation	Electric shock, arc flash, fire.
	Fuel storage and refueling	Fuel spills, fire, explosion, soil and water contamination
	Chemical storage and handling	Hazardous substance exposure, spills, and environmental contamination
	Equipment maintenance	Oil spills, fire, injuries, hazardous waste generation
	Crane and lifting operations	Dropped loads, equipment collapses, collision with overhead utilities
	Vehicle movements	Traffic accidents involving workers or the public
	Temporary worker facilities	Fire, medical emergency, food safety incident, infectious disease outbreak
	Waste management	Fire, hazardous waste exposure, spills, pest infestation
	Material storage	Material collapse, fire, wind damage during storms
	Removal of temporary facilities	Equipment incidents, waste handling injuries, fire
	Landscaping	Heat stress, equipment incidents, chemical exposure (where herbicides or pesticides are used)
	Life and Safety requirement inspection and certifications	Failure to obtain life and fire certification and compliance with WBG EHS Guidelines.
Operation	Operation and Maintenance of housing buildings	Failure to implement and maintain life and safety procedures systems such as fire alarms and emergency response plans.
All Phases	Hurricane season	Hurricanes, tropical storms, flooding, storm surge, high winds, flying debris, prolonged power outages

Project Phase	Activity	Potential risks / events
All Phases	Severe weather	Lightning, heavy rainfall, flash flooding, strong winds, heat stress

Source: 4CR, 2026

Emergency preparedness activities shall be integrated into all construction planning and scheduling. Prior to commencement of high-risk activities, the Contractor shall verify that appropriate emergency procedures, trained personnel, emergency equipment, communication systems, evacuation routes, and external emergency contacts are in place and operational.

1.7 RISKS, IMPACTS AND MANAGEMENT MEASURES

The following sections describe the key risks as emergency events, potential impacts and management measures associated with Project's activities.

1.7.1 Key Risks and Impacts

For the Project the following key risks as, emergency events may include:

- Fires or explosions may occur during demolition, hot works (welding and cutting), electrical works, fuel storage, refueling, equipment maintenance, or improper storage of flammable materials. These events may result in injury or fatality, damage to project assets, interruption of construction activities, and environmental pollution.
- Accidental spills or leaks during storage, handling, transport, refuelling or equipment maintenance may contaminate soil, drainage systems, groundwater, coastal waters, and other environmentally sensitive receptors, while also creating fire and health hazards.
- Workers, contractors or visitors may experience illnesses or injuries requiring immediate medical attention, including heat stress, dehydration, cardiac events, allergic reactions, insect bites, or other medical conditions.
- Partial or complete collapse of existing buildings, excavations, temporary works or partially completed structures may endanger workers and nearby communities, damage adjacent property and interrupt project activities.
- Project construction vehicles, heavy equipment and public traffic may be involved in collisions affecting workers, nearby communities, pedestrians, cyclists or other road users.
- The Project may be subject to hurricanes and tropical storms, which present significant risks, including high winds, storm surge, flooding, flying debris, infrastructure damage, prolonged power outages, and disruption of emergency services. Lightning presents a direct risk to workers, particularly during outdoor activities and crane operations.
- Significant environmental incidents, including uncontrolled sediment releases, major fuel spills, fires affecting hazardous materials, or contamination of receiving waters.

1.7.2 Management measures

The Project shall adopt and implement the following best practices to address the risks and impacts described above.

Impact or Risk	Mitigation / Management
Fire and explosion	• Develop and implement a Fire Prevention Procedure in compliance with legal requirement and Life and Fire requirements under WBG EHS Guidelines. • Maintain appropriate fire extinguishers throughout the site and inspect them monthly.
	• Establish designated smoking areas away from flammable materials. • Control ignition sources through a Hot Work Permit system. • Store flammable materials in designated, ventilated areas.
	• Maintain clear emergency access routes at all times. • Conduct regular fire drills and fire extinguisher training. • Display emergency evacuation routes and assembly points throughout the site.
Fuel, oil and chemical spills	• Store fuels and chemicals within bunded areas with secondary containment. • Maintain spill response kits at all storage, refueling and maintenance locations. • Train personnel in spill prevention and response procedures. • Stop, contain, recover and dispose of spilled materials in accordance with approved procedures. • Prevent spills from entering drainage systems or environmentally sensitive receptors. • Report and investigate all significant spills.
Medical emergencies	• Maintain trained first aid personnel on site at all times. • Provide appropriately stocked first aid kits and emergency medical equipment. • Maintain communication systems for contacting emergency medical services. • Clearly display emergency contact information. • Ensure access routes remain available for emergency vehicles. • Record and investigate all medical emergencies.
Serious injury or fatality	• Stop work immediately and secure the area. • Notify emergency services and the Project Manager. • Preserve the incident scene unless required to protect life or prevent further injury. • Notify regulatory authorities the PIU and the IDB • Conduct a formal incident investigation and implement corrective actions before work resumes.
	• Maintain emergency vehicle access at all times. • Ensure operators of Project vehicles are appropriately trained and licensed.

Impact or Risk	Mitigation / Management
	• Establish emergency communication procedures for traffic incidents. • Coordinate with local emergency services where public roads are affected.
Hurricanes, tropical storms and storm surge	• Monitor official weather forecasts throughout hurricane season. • Develop, implement and maintain a Hurricane Preparedness Checklist. • Secure cranes, scaffolding, temporary structures, fuel tanks, stockpiles and loose materials before forecast storm events. • Suspend construction activities when severe weather warnings are issued. • Evacuate personnel where required. • Conduct post-event inspections before recommencing work.
	• Repair damaged environmental controls prior to restarting construction.
Severe rainfall, flooding and lightning	• Monitor weather forecasts daily. • Suspend crane operations and outdoor work during lightning events or severe storms. • Maintain stormwater drainage systems free of debris. • Protect excavations against flooding. • Inspect work areas after heavy rainfall before resuming activities.
Security incidents	• Control site access during an emergency event through fencing and security personnel where appropriate. • Maintain site entry registers and procedures (workers, visitors and emergency personnel) • Implement the Community Health and Safety Management Plan
Environmental emergencies	• Immediately contain environmental releases. • Notify the EHS Manager and Project Manager. • Implement environmental remediation where required. • Notify regulatory authorities and the IDB of significant environmental incidents in accordance with project reporting procedures.

Source: 4CR, 2026

1.8 GENERAL EMERGENCY PREPAREDNESS PROTOCOLS

1.8.1.1 Emergency Protocols for Internal Communications

During an emergency, the following alarm notification and communication principles shall apply:

- Protect life as the first priority.
- Raise the alarm immediately.
- Notify the Project Manager and EHS Manager without delay.
- Contact external emergency services where required.
- Communicate clear instructions to all personnel.

- Maintain communication with the Project Manager and EHS Manager throughout significant incidents.
- Record all emergency events, response actions and lessons learned for continual improvement.

1.8.1.2 Community Communication Protocols

During an emergency and if there is a risk that local residents or community may be affected by the emergency. The Community Liaison Officer will implement the relevant communication protocols below and implement the Community Health and Safety Management Plan. The following alarm notification and communication principles shall apply:

- Activate communication protocols
- Raise the alarm immediately and notify local residents or the general community, through agreed communication channels.
- Contact external emergency services and advice activation of evacuation of local communities, if required.
- Communicate clear instructions to the community.
- Maintain communication with the Project Manager and EHS Manager throughout significant incidents.
- Record all emergency events, response actions and lessons learned for continual improvement.

1.8.1.3 Business Continuity and Recovery Protocols

After a significant emergency event, the Construction Site Manager shall:

- Conduct structural and environmental inspections before recommencing work.
- Assess damage to project infrastructure, equipment and environmental controls.
- Verify that utilities have been safely restored.
- Remove debris in accordance with the Waste and Hazardous Materials Management Plan.
- Review the effectiveness of the emergency response.
- Implement corrective and preventive actions.
- Obtain authorization from the Project Manager before resuming construction activities.

1.9 DOCUMENTATION AND MONITORING

Evidence of the Plan's implementation will be required to be documented and retained to demonstrate compliance. Implementation documentation shall be retained on-site and made available upon request. The implementation evidence shall be done in physical records and digital (including native and scanned files, as well as photography where appropriate), including but not limited to the following:

- Emergency Evacuation Plan, including evacuation routes and meeting points.
- Emergency contact directory.
- Emergency equipment inventory.
- Emergency drill schedule, attendance records and evaluation reports.

- First aid and emergency training awareness records.
- Inspections of emergency access roads and evacuation routes to ensure that these are kept unobstructed.
- Verification that emergency contact lists remain current.
- Inspection of emergency signage and assembly points
- Weather monitoring reports, alerts and hurricane preparedness records.
- Daily and weekly inspection (with photographs) records and reports of emergency preparedness and response equipment, first aid kits, spill response kits, and Fire extinguishers.
- Corrective Action Register.
- Monthly / Quarterly compliance reports.

Monitoring shall adopt an adaptive management approach whereby mitigation measures are modified where inspections indicate recurring events.

1.10 KEY PERFORMANCE INDICATORS

The following KPIs shown below will be useful to determine if the Plan has been effectively implemented. Based on the level of compliance with indicators, the Project can identify if changes are necessary and can consider improvement measures.

Impact	KPI	Target	Method	Monitoring Tool	Frequency
Emergency preparedness	Personnel receiving emergency induction and awareness training	100% prior to commencing work	Training record review	Training matrix	Prior to mobilization and for all new personnel
Emergency preparedness	Personnel participating in scheduled emergency drills	≥95% participation	Attendance review	Drill attendance register	Every drill
Emergency preparedness	Scheduled emergency drills completed	100% completed according to annual schedule	Programme review	Drill schedule	Six-monthly minimum
Fire preparedness	Fire extinguishers inspected and serviceable	100% compliance	Physical inspection	Fire extinguisher inspection checklist	Monthly
Medical preparedness	First aid kits fully stocked and available	100% compliance	Physical inspection	First aid inspection checklist	Monthly

Impact	KPI	Target	Method	Monitoring Tool	Frequency
Spill preparedness	Spill kits available, accessible and fully stocked	100% compliance	Physical inspection	Spill kit inspection checklist	Monthly
Emergency communications	Emergency contact lists current	100% accurate and updated	Document review	Emergency contact register	Monthly
Emergency access	Emergency access roads, exits and assembly points unobstructed	100% compliance	Site inspection	Emergency inspection checklist	Weekly
Emergency equipment	Emergency lighting, alarms and communication devices operational	100% operational	Functional testing	Equipment inspection records	Monthly
Emergency response	Response initiated following emergency notification	Initial response initiated within 5 minutes of notification (where practicable)	Incident review	Incident reports	Each incident
Fire incidents	Uncontrolled fires on site	Zero	Incident investigation	Incident register	Continuous
Fuel and chemical spills	Significant uncontrolled spills	Zero	Incident investigation	Spill register	Continuous
Hurricane preparedness	Hurricane preparedness checklist completed prior to forecast hurricane or tropical storm	100% completion before suspension of works	Checklist verification	Hurricane preparedness checklist	Prior to each forecast severe climatic event
Severe weather	Post-event inspections completed before recommencing work	100% compliance	Inspection	Post-event inspection reports	Following each severe weather event

Impact	KPI	Target	Method	Monitoring Tool	Frequency
Incident management	Emergency incidents investigated	100% investigated	Incident review	Investigation reports	Each incident
Corrective actions	Corrective actions closed by agreed due date	≥95% completed on time	Corrective action review	Corrective Action Register	Monthly
Regulatory reporting	Reportable incidents notified within required timeframes	100% compliance	Record review	Incident notification log	Each reportable incident
Community safety	Substantiated community complaints regarding emergency preparedness	≤1 per month	Complaint review	Grievance register	Monthly

Source: 4CR, 2026

1.11 REPORTING

The Contractors are required to report to the Project EHS Manager the following:

- Weekly incident report for emergency events.
- Monthly Emergency Preparedness and Response Monitoring Reports summarizing:
    - emergency inspections of work sites and equipment, including findings;
    - emergency training completed;
    - emergency drills undertaken;
    - emergency equipment inspections;
    - completion of emergency response training;
    - emergency drills outcomes, findings and recommendations;
    - emergency incidents and non-conformances report. These reports shall include:
        - Date and time.
        - Location.
        - Description of the incident.
        - Immediate response actions.
        - Environmental and social impacts.
        - Injuries or fatalities.
        - Corrective and preventive actions.
        - Status of recovery activities.

Corrective actions were implemented and closed within the due date.

Under the IDB ESPF and ESPS1, the Plan implementation should be included in the Project's regular Environmental and Social monitoring reports (typically quarterly during construction, unless otherwise agreed with IDB). Reporting should include:

- Status of Plan implementation.
- Results of inspections and monitoring.
- Compliance with emergency preparedness and response requirements.
- Summary of incidents and non-conformances.
- Corrective and preventive actions implemented.
- Outstanding actions and recommendations.
- Photographic evidence where appropriate.

A summary of the reporting activities, frequency, and responsibilities is outlined in the following table.

Reporting Activity	Frequency	Responsible
Routine inspections	Weekly	Contractor
Formal review of the Plan	Every six months or following significant changes	Contractor / Supervision Consultant
Environmental and Social monitoring report to IDB	Quarterly (or as agreed with the IDB)	Project Proponent

Source: 4CR, 2026

1.12 REVIEW AND UPDATE

This Plan shall be treated as a living document and reviewed throughout the Project to ensure continued effectiveness. The Project EHS Manager will review and update the Plan every six months, , or in response to significant changes, monitoring results, or design changes. The Plan should be reviewed, updated, and approved by the EHS Manager. As a minimum, the Plan shall be reviewed:

- Prior to commencement of demolition and construction, operation or closure phases.
- Before major changes in construction methods or sequencing.
- Following the identification of significant findings and/or deficiencies after inspection or audits.

The review process shall evaluate the following:

- Compliance with applicable requirements.
- Adequacy of emergency preparedness arrangements.
- Availability and condition of emergency equipment.
- Performance during emergency drills.
- Effectiveness of emergency communications.
- Incident trends.
- KPI performance.

- Community concerns and complaints.
- Coordination with external emergency services.
- Lessons learned from incidents and exercises.
- Effectiveness of corrective actions.

ANNEX I

Disaster and Climate Change Risk Assessment Guidance Document

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

1. INTRODUCTION

In accordance with the requirements of the Inter-American Development Bank's (IDB) Environmental and Social Performance Standard (ESPS) 4, projects are required to undertake a simplified qualitative assessment of disaster and climate-related risks. This assessment evaluates the potential impacts of natural hazards on the project's structural integrity, functionality, and operational performance throughout its lifecycle. It also considers the potential risks that the project may pose to surrounding communities, assets, and the environment because of failures in project components, as well as the possibility of exacerbating existing natural hazard conditions.

Based on the results of the assessment, each project is assigned an overall risk rating (high, moderate, or low). Appropriate risk management and mitigation measures are then identified to address the relevant hazards and reduce potential adverse impacts to acceptable levels.

The disaster risk assessment is conducted in accordance with the IDB's Methodology for Disaster and Climate Change Risk Assessment (Technical Note No. IDB-TN-01771, 2019). Reference methodology

This Guidance Document is based on the requirements of the Environmental and Social Performance Standard (ESPS) 4 on Community Health and Safety and the Methodology for Disaster and Climate Change Risk Assessment, which provides a practical framework for identifying and appropriately addressing disaster and climate change risks in projects.

The methodology evaluates the Hazard, Vulnerability, and Exposure variables for the infrastructure project. The interaction among these components determines the qualitative risk level associated with each hazard considered. These components are defined as follows:

- Hazard: a phenomenon, event, or process that has the potential to cause adverse social and/or economic consequences, as well as environmental damage.
- Vulnerability: the characteristics and circumstances of a community, system, or asset that make it susceptible to the damaging effects of a hazard.
- Exposure: the spatial and temporal coincidence of people, assets (both physical and environmental), and natural hazards, resulting in the potential for adverse impacts or damage.

Figure 1.1: Composition of Disaster and Climate Change Risk



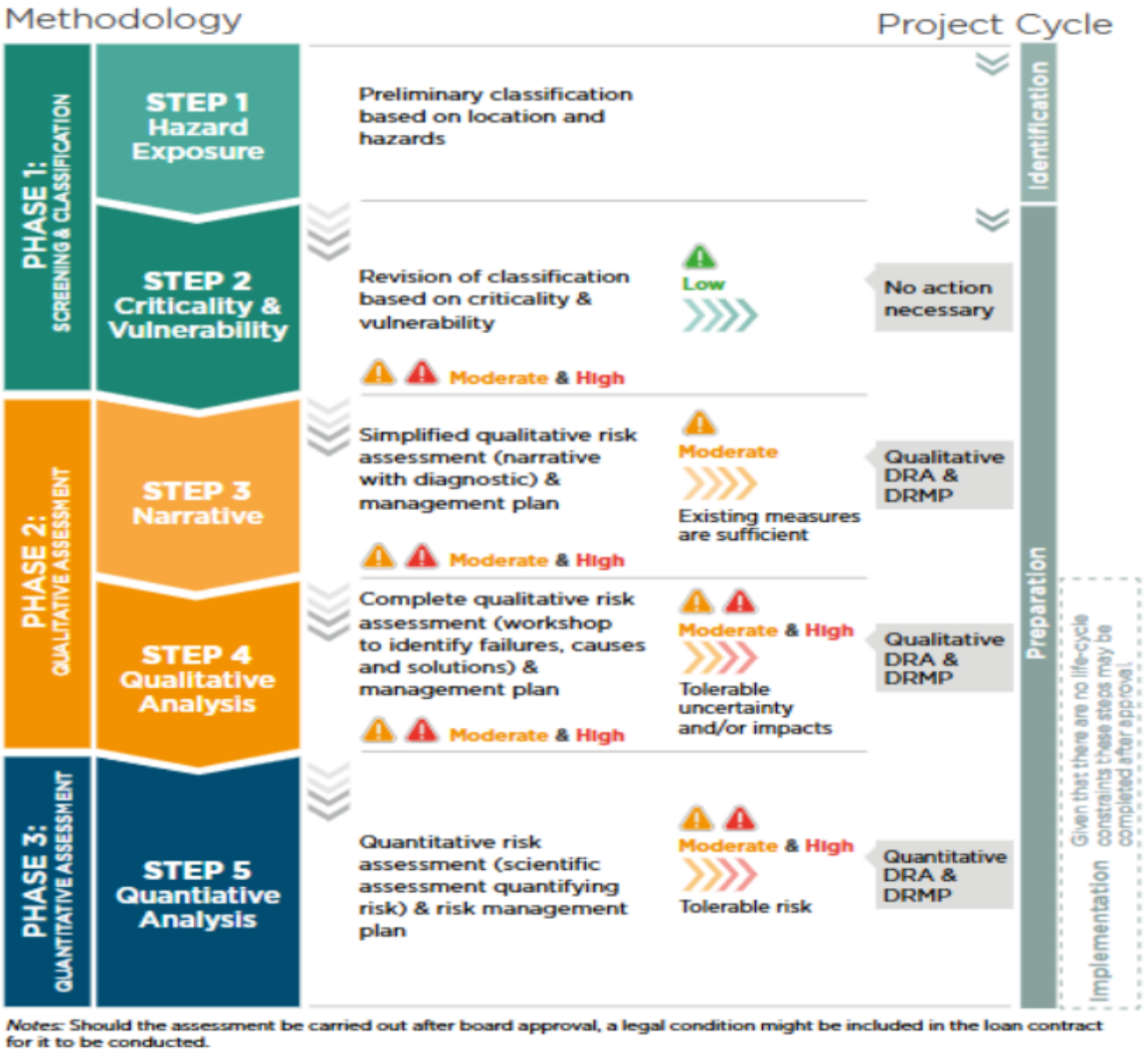
Source: IDB (2019)

The methodology is based on three fundamental pillars:

1. Hazard and vulnerability identification: identifying the natural hazards that may affect a project, as well as the physical, social, and economic characteristics that make it vulnerable to those hazards. In addition to hazard and vulnerability, the assessment must also consider the project's criticality: the potential magnitude of losses, damage, or disruption that would result should the asset fail, relative to its physical, social, and economic context (see Step 2, "Criticality and vulnerability," and Figure 2.1). For example, individual private housing units generally present lower criticality than shared or public infrastructure, such as schools, health posts, or water and sanitation systems, since the consequences of an isolated failure are more limited and easier to manage, whereas failure of critical infrastructure has broader and more severe consequences for the surrounding community.
2. Risk assessment: estimating the likelihood of an adverse event occurring and the potential consequences it could have on the project.
3. Risk management: implementing measures to reduce disaster and climate change risks, including prevention, mitigation, and preparedness measures.

The IDB Methodology is flexible and allows its application to be adapted to the specific needs of each type of project. It includes various phases and steps in which the level of effort and resources is proportional to the level of risk. The steps considered in the IDB Methodology are illustrated in the following figure.

Figure 1.2 : Methodology for risk and climate change risk assessment from the IDB



Source: IDB (2019)

The methodological structure proposed by the IDB is applied to meet the following objectives:

- Ensure compliance with the core policy mandate of not financing projects that increase social, economic, or environmental risk in absolute terms relative to the baseline.
- Consider risk as an integral variable, addressing both the potential impacts on the operation itself and those the project could have on nearby communities, including the possible exacerbation of existing risks.
- Improve the processes and outputs derived from screening and classification (Disaster and Climate Change Risk Analyses – DRA) and Disaster and Climate Change Risk Management Plans (DRMP), by strengthening the conceptual framework, developing practical tools and recommendations, and piloting the methodology across different IDB sectors.

2. PROCEDURE

According to the IDB Methodology, to conduct a simplified qualitative risk analysis, the following steps must be taken:

This Disaster and Climate Change Risk Assessment (DRA) is carried out as part of the identification of environmental and social risks and impacts under the Environmental and Social Assessment (ESA) instruments applicable to the Program, consistent with the Environmental and Social Management Framework (ESMF). The DRA must be incorporated into the ESA process, at least at the initial screening and criticality stages (Steps 1 and 2), so that disaster and climate change risks are addressed as an integral part of the Program's overall identification of risks and impacts.

i. Step 1: Hazard Exposure

The first step consists of a preliminary screening of the project location to identify its exposure to natural hazards and climate-related threats. This assessment is based on available hazard maps, climate information, and relevant datasets and provides an initial classification of the project's exposure level.

The purpose of this step is to establish an initial understanding of the environmental conditions and hazard context of the project area before evaluating the specific characteristics, vulnerabilities, and criticality of the proposed infrastructure in subsequent stages of the assessment.

The following information sources are recommended to support the hazard exposure assessment, where applicable: ThinkHazard! Tool developed by the World Bank, the Climate Change Knowledge Portal (CCKP), the National Oceanic and Atmospheric Administration (NOAA), and relevant national or regional hazard datasets. Additional technical studies and project-specific information may also be used to complement the assessment.

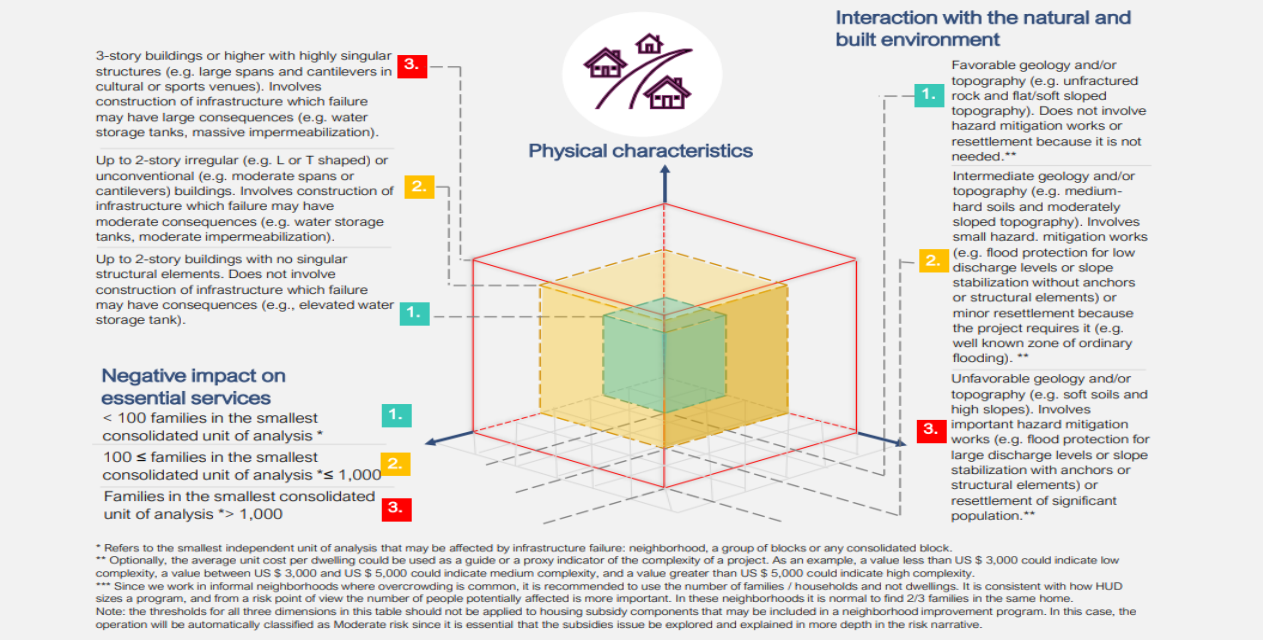
The information sources can be accessed in the following links:

- https://thinkhazard.org/en/report/20-the-bahamas.
- https://climateknowledgeportal.worldbank.org/country/bahamas
- https://coast.noaa.gov/hurricanes/#map=4/32/-80

ii. Step 2: Criticality and vulnerability.

Determine the project’s vulnerability and criticality, considering the potential for losses and damage that could occur in case of failure, in relation to existing physical, environmental, and socioeconomic conditions.

Figure 2.1: Criticality graphic for urban interventions and neighborhood improvement



Source: IDB (2019)

iii. Step 3: Risk Narrative

For projects with moderate or high criticality, a qualitative risk narrative must be developed. This narrative identifies, analyzes, and describes the main risk factors that could affect infrastructure performance, considering location, preliminary design, function within the territorial system, and exposure to natural hazards. This structured evaluation does not require quantitative modeling but must be grounded in sound technical reasoning and available evidence. Its purpose is to determine whether the residual risk—after applying proposed mitigation measures—is acceptable, or whether a more detailed assessment (Steps 4 or 5) is needed.

For the analyzed works – urban housing developments – the narrative should focus particularly on hurricane-related hazards, including strong winds, storm surge, coastal flooding, and extreme rainfall, due to their potential effects on housing structures, residents, and essential services.

To help teams structure the analysis, the Risk Narrative can generally follow this outline:

1. Hazard characterization – summary of the natural hazards identified in Step 1 that are relevant to the project location.

2. Vulnerability and criticality description – the physical, social, and economic factors that affect the project's susceptibility and criticality, per Step 2.

3. Risk narrative – a qualitative discussion of how the identified hazards could affect the project's structural integrity, functionality, and the surrounding community, considering location, design, and exposure.

4. Proposed mitigation measures – the design and management measures proposed to reduce the risk to an acceptable or tolerable level.

5. Conclusion – a determination of the residual risk (acceptable/tolerable) and a recommendation on whether a more detailed assessment (Steps 4 or 5) is required.

iv. Step 4: Qualitative assessment:

This step consists of undertaking a qualitative assessment for projects classified as high risk, as well as for moderate-risk projects that require further analysis. This assessment aims to identify potential failure mechanisms, vulnerabilities, and adverse impacts that natural hazards could generate on the project, surrounding communities, and the environment.

The risk assessment is based on a risk matrix methodology, a qualitative or semi-quantitative tool that defines categories of frequency (probability) and severity/impact (consequences) of a risk, plotting each on intersecting axes. The matrix uses thresholds to classify frequency and severity of impacts.

Hazard frequency is assessed using a 3-level classification system that reflects the probability of occurrence and expected recurrence of a hazard event. The categories range from low to high, representing events that are respectively extremely unlikely to highly likely to occur during the project lifetime.

This classification provides a consistent basis for evaluating the likelihood component of risk and supports the determination of overall risk levels within the risk matrix, as shown in the table below.

Table 2.1 Frequency level categories

#	Frequency Level	Return Period	Qualitative Description
3	**High**	< 50 years (> 2% annual probability)	Likely to occur at least once or multiple times during the project lifetime.
2	**Moderate**	50–100 years (1–2% annual probability)	Events may occur during project lifetime
1	**Low**	>100 years (<1% annual probability)	Unlikely or extremely unlikely to occur during the project lifetime.

Source: 4CR, 2026

Impact severity is assessed using a three-level classification system that reflects the magnitude of the potential consequences associated with a hazard event. The categories range from low to high, considering potential effects on human health and safety, infrastructure and assets, service continuity, environmental conditions, and overall project performance.

Lower ratings correspond to negligible or easily manageable impacts, while higher ratings represent increasingly severe consequences that may result in significant damage, prolonged disruption, or threats to project viability. This classification provides a consistent basis for evaluating the consequence component of risk and supports the determination of overall risk levels within the risk matrix, as shown in the table below.

Table 2.2. Impact level categories

#	Impact Level	Description
4	**High**	Fatalities, permanent disabilities, or serious injuries; significant to irreversible damage to assets, environment, or services; or extended disruption (weeks to months). Required major intervention

#	Impact Level	Description
3	**Moderate**	Treatable injuries, partial damage, or service disruption of weeks. Reversible with intervention.
2	**Low**	Minor or no injuries; minimal or easily repairable damage; negligible or very short disruption (hours to days).

Source: 4CR, 2026

The overall risk level is determined by combining the estimated frequency of a hazard event with the severity of its potential consequences through a risk matrix.

This methodology provides a structured framework for evaluating how likely a hazard is to occur and the magnitude of its potential impact on the project. The intersection of the frequency and impact ratings results in a risk classification ranging from low to high, allowing risks to be prioritized and informing the identification of appropriate mitigation, adaptation, and risk management measures.

The risk matrix applied in this assessment is presented in the table below.

Table 2.3. Risk Matrix

Frequency	Impact		
	Low	Moderate	High
Low	Low	Low	Moderate
Moderate	Low	Moderate	High
High	Moderate	High	High

Source: 4CR, 2026

For each identified hazard, an initial risk level will be determined using the risk matrix based on the estimated frequency and potential consequences of the event. Mitigation and resilience measures will then be identified and incorporated into the project. Following their implementation, the risk will be reassessed to determine the residual risk level. That assessment shall determine whether the remaining risk is acceptable or tolerable, whether additional risk-reduction measures are reasonably feasible, and whether further qualitative or quantitative analysis is required. A Moderate Low level residual risk could be appropriate, depending on the context.

3. DISASTER AND CLIMATE CHANGE RISK MANAGEMENT PLAN

The Disaster Risk Management Plan (DRMP) is a technical instrument forming part of project design and planning. Its purpose is to anticipate, prevent, reduce, and manage risks from natural hazards and climate change that could affect infrastructure throughout its lifecycle. Its goal is not only to prevent physical damage but also to ensure operational continuity and protect people, services, and the surrounding environment. To avoid duplication of processes, the DRMP should be integrated into, or clearly cross-referenced with, the Program's Environmental and Social Management Plan (ESMP), so that implementation, monitoring, and reporting arrangements remain consistent across both instruments.

In practical terms, the DRMP for each project must address the risks identified during the assessment, including required technical studies, design criteria, and structural and non-structural measures that allow the infrastructure to adapt to its risk context. For housing projects, this may include conducting flooding assessments analysis to manage flows and reduce the impacts of intense rainfall events. During project phases (e.g. design, construction), planning measures must be implemented such as runoff control, proper soil management, and slope stabilization practices.

To adequately manage risks that may exceed the Project's structural design parameters, an Emergency Preparedness and Response Plan (EPRP) will be developed or, where one already exists for the site or facility, updated in a complementary manner, to establish the procedures, roles, communication protocols, and response actions to be implemented before, during, and after emergency events, including hurricanes and other natural hazards.

Within this Program, disaster risk management seeks to reduce losses in lives, livelihoods, and public health, while protecting economic, physical, social, cultural, and environmental assets to ensure stability after disruptive events. The approach integrates preparedness and response measures for climate and natural hazards, particularly coastal flooding, hurricanes, and storm surges.

Annex J

Resettlement and Livelihood Restoration Framework (RLRF)

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

LIST OF ACRONYMS AND ABBREVIATIONS

AoI	Area of Influence
CLO	Community Liaison Officer
DAI	Direct Area of Influence
DEPP	Department of Environmental Planning and Protection
E&S	Environmental and Social
EA	Executing Agency
EIA	Environmental Impact Assessments
ESA	Environmental and Social Assessment
ESAP	Environmental and Social Action Plan
ESBA	Environmental & Social Baseline Assessment
ESMP	Environmental & Social Management Plan
ESMP	Environmental and Social Management Plan
ESMPc	Environmental and Social Management Plan at the Construction Phase
ESPF	Environmental and Social Policy Framework
ESPS	Environmental and Social Performance Standards
GoB	Government of the Bahamas
GRM	Grievance Redress Mechanism
HAE	Human-Altered Environment
IAI	Indirect Area of Influence
IDB	InterAmerican Development Bank
LRP	Livelihood Restoration Plan
MOHLR	Ministry of Housing and Land Reform
NbS	Nature-based Solutions
PAHs	Program Affected Households
PAPs	Project Affected Persons
PwD	People with disabilities
RAP	Resettlement Action Plan
RoW	Right of Way
RP	Resettlement Plan
SuDS	Sustainable Drainage Systems
USD	United States Dollars

1 INTRODUCTION

1.1 BACKGROUND

The Bahamas is highly vulnerable to natural disasters due to its archipelagic geography, low-lying coastal settlements, and location within the Atlantic hurricane belt. This exposure has significant implications for the housing sector, as demonstrated by Hurricane Dorian in 2019, which caused an estimated US$3.4 billion in total impacts, equivalent to more than one quarter of national GDP, affected 29,472 people, and resulted in approximately US$1.49 billion in housing damage.[1] These impacts reflect the vulnerability and the need for safer, more resilient, and affordable housing solutions to reduce disaster risks and strengthen the country's capacity for sustainable recovery and long-term climate resilience.

Accordingly, the Government of The Bahamas is preparing the Investment Program Sustainable Housing Opportunities for Urban Transformation BH-L1064 (hereinafter referred to as the "Program") with financing from the Inter-American Development Bank (IDB). Led by the Ministry of Housing and Land Reform (MOHLR), this Program aims to improve the supply and sustainability of housing for low- and middle-income households through:

- Developing an attractive Public-Private Partnership (PPP) window and more sustainable housing finance.
- Improving the development attractiveness of vacant land tracts and derelict properties.
- Expanding the capacity and useful life of the existing housing stock.
- Reforming the regulatory environment for mixed-use development, multi-family housing, urban regeneration rent control, and Transit-Oriented Development.
- The BH-L1064 Program is structured as a Global of Multiple Works (GOM) operation under which individual projects will be identified and prepared during Program Implementation.

The Table below presents representative sample projects selected to serve as the basis for assessing the environmental and social risks and impacts associated with the Program, informing its environmental and social risk classification, and supporting the preparation of the Environmental and Social Management Framework (ESMF) and other environmental and social instruments applicable to future investments.

Table 1-1 Representative sample BH-L1064 projects

#	Project Name	Location / Island	Description
1	Clifford Darling Estates – Pinecrest	New Providence	Fund Infrastructure - Serviced lots for private investment
2	Clifford Darling Est's (PINECREST II)	New Providence	Serviced lots for direct construction - Build High Density (Condominium)
3	Central Pines	Abaco	Serviced lots for direct construction - Build Single Family

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[1] IDB, 2019. Damages and Other Impacts on The Bahamas by Hurricane Dorian Estimated at $3.4 Billion: Report. Accessible at: https://www.iadb.org/en/news/damages-and-other-impacts-bahamas-hurricane-dorian-estimated-34-billion-report

#	Project Name	Location / Island	Description
4	Garden Village	Grand Bahama	Rehabilitation of Clusters of Underused or Abandoned Housing Units
5	Private Housing	TBD	Minor repairs/auxiliary unit/resilient retrofits; existing stock improvement
6	Public Housing	TBD	Maintenance and capacity expansion; existing stock improvement

Source: TOR-IDB, 2026

While the Program is expected to generate substantial social benefits by improving housing conditions and enhancing resilience to climate change and natural hazards, certain projects may, for safety reasons, require land acquisition, temporary or permanent restrictions on land use or access to assets, or physical and/or economic displacement. Such measures may be necessary where households occupy areas that are unsafe or highly vulnerable to natural hazards, or where redevelopment is required to provide resilient housing and supporting infrastructure. These impacts are anticipated to be site-specific and can be effectively managed through appropriate planning and mitigation measures.

1.2 PROGRAM COMPONENTS

The Program is organized around four main components with the general goal to improve access to adequate housing for low-to middle-income households in The Bahamas.

- Component I – Institutional Strengthening and Regulatory Reform. Strengthens MHLR's institutional capacity and the housing regulatory framework, with a focus on modernizing the Bahamas Mortgage Corporation (BMC) – its governance, systems, underwriting, and credit-scoring systems - and broadening mortgage-market access. This component may also include creating a Public Housing Authority and Housing Development Agency, plus zoning, permitting, and rent-control reforms.
- Component II – New Housing. Increases the housing supply via serviced lots for private investment, direct construction, and rehabilitation of underused or abandoned units. The rental share of new solutions was raised from 35% to 77%, since the BMC currently can't mortgage-finance more for-sale units than that.
- Component III – Improvement of the Existing Housing Stock. Provides concessional micro-loans (not grants) to existing homeowners for urgent repairs, auxiliary/rental unit additions, and resilience retrofits, and also covers repairs, maintenance, and capacity expansion of public housing estates. The BMC will administer the loans, initially limited to its ~2,500 current mortgagors.
- Project Administration and Management. Covers the implementation unit's staffing, auditing, monitoring, supervision, and evaluation costs.

1.3 PROGRAM BENEFICIARIES

The primary beneficiaries of the Program are low- and moderate- income households that face housing deficits, inadequate living conditions, or increased vulnerability to natural hazards and climate-related risks. Beneficiaries may include homeowners, tenants, and households requiring access to new affordable housing opportunities. Particular attention will be given to

vulnerable groups, including female-headed households, older persons, persons with disabilities, persons with mental and physical health problems, low-income families, and undocumented persons, among others.

The Program will also generate broader community benefits through improved neighborhood infrastructure, enhanced resilience to climate and disaster risks, increased access to basic services, improved public health and safety conditions, and job creation associated with construction and rehabilitation activities.

2 LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

Program activities may have the potential to cause involuntary resettlement and, consequently, temporary or permanent physical and/or economic displacement. Where such impacts are identified, they will be avoided where feasible, minimized where unavoidable, and managed through project-specific measures consistent with this RLRF and IDB ESPS 5.

This Resettlement and Livelihood Restoration Framework (RLRF) is a Program-level framework prepared to guide the Government of The Bahamas in managing potential land acquisition, restrictions on land use or access, and physical and/or economic displacement under BH-L1064. It is not a site-specific RAP or LRP. It establishes minimum principles, procedures, eligibility and entitlement rules, institutional responsibilities, and minimum content requirements to be applied during screening and, where impacts are confirmed, to the preparation and implementation of project-specific RAPs and/or LRPs in accordance with IDB ESPS 5 and applicable national law.

2.1 OBJECTIVE

The objective of this RLRF is to establish the principles, procedures, and institutional responsibilities that will guide the management of any potential land acquisition, restrictions on land use, physical displacement, economic displacement, or loss of access to assets, housing, services, or livelihoods that may arise under the Program, and in compliance with national regulations and IDB ESPS 5: Land Acquisition and Involuntary Resettlement. Its planning and implementation focus on preventing impoverishment of affected populations.

At this stage, because the locations, designs, land requirements, affected persons, and magnitude of displacement are not yet fully defined for all future projects, this RLRF is applied before and during project screening. Once a project is sufficiently defined, the framework requirements will be translated into a project-specific RAP, LRP, or combined instrument, as applicable. The RLRF therefore explains what must be assessed, why it is required, when project-specific planning is triggered, and how minimum ESPS 5 requirements are to be implemented.

2.2 SCOPE

The RLRF applies to all Program activities that may directly or indirectly result in permanent or temporary land acquisition, restrictions on land use or access, loss of housing, loss of assets, loss of income, impacts on businesses, or impacts on formal or informal users of land, housing, or other assets. It will also apply to associated impacts that may affect tenants, renters, leaseholders, informal occupants, small businesses, workers, community facilities, or vulnerable persons and groups.

It applies to all Program components and future projects, including new housing, redevelopment, rehabilitation, infrastructure, housing improvement, and use of public areas, where people, assets, access, occupancy, or livelihoods may be affected.

Project activities that may cause physical or economic displacement shall not proceed to land acquisition, relocation, restrictions on land use or access, or related civil works until the required RAP/LRP measures have been prepared, disclosed, consulted on, approved as applicable, and implemented in accordance with ESPS 5.

2.2.1 Approach for Future Projects

This RLRF identifies the general ESPS 5 principles, procedures, and responsibilities that will apply to future projects under BH-L1064 where land acquisition, land-use restrictions, physical

displacement, economic displacement, or livelihood impacts may occur. It should be used when specific sites, designs, affected persons, or displacement impacts are not yet fully known.

Each future project will be screened to identify potential resettlement and livelihood risks (See ESMF Annex A - E&S Screening Form). Where impacts are identified, the Program will prepare a site-specific Resettlement Action Plan and Livelihood Restoration Plan, , following this framework guidance and proportional to the nature and scale of the impacts and consistent with IDB ESPS 5.

2.2.2 Guiding Principles of ESPS 5

The RLRF is based on the following guiding principles, consistent with the IDB ESPS 5, which applies where land acquisition or restrictions on land use, assets, or natural resources may result in physical displacement, economic displacement, or both.

Its core guiding principles are:

- **Avoidance and minimization of displacement:** Program design and project selection will seek to avoid or minimize land acquisition, restrictions on land use, involuntary resettlement, and both physical and economic displacement. Where displacement cannot be avoided, impacts will be reduced through design alternatives, implementation measures, and careful planning.
- **Restoration or improvement of livelihoods and living standards:** Where displacement is unavoidable, the Program will support affected persons to improve or restore their livelihoods and standards of living. Livelihood restoration is not limited to payment of compensation; it may include financial measures, in-kind support, technical assistance, employment support, transitional support, or other measures needed to help affected persons regain or improve their pre-Program income levels and living conditions.
- **Compensation at full replacement cost:** Losses of land, housing, structures, improvements, assets, income, access, or livelihood sources will be compensated at full replacement cost, as applicable. Compensation will consider the cost of replacing or reestablishing affected assets and activities, including transaction costs, transfer costs, restoration costs, and other costs necessary to avoid leaving affected persons worse off. The IDB Guidelines define replacement cost as market value plus transaction costs, such as taxes and legal fees.
- **Eligibility of all categories of affected persons:** Eligibility for compensation, resettlement assistance, and livelihood restoration will be based on the type of impact suffered and presence before the cut-off date, not only on formal legal title. The RLRF will cover persons with formal legal rights, persons with recognizable claims, and persons without recognizable legal rights or claims, as well as economically displaced persons. This may include landowners, tenants, renters, informal occupants, business owners and workers, and persons depending on subsistence or informal livelihoods.
- **Support for persons without formal legal rights or claims:** Persons without formal legal title will not be excluded from assistance solely because of their tenure status. Where they are present before the cut-off date, they will be eligible for appropriate resettlement assistance, livelihood restoration support, and compensation for eligible non-land assets, in accordance with ESPS 5.
- **Consideration of host communities:** Where physical relocation is required, the Program will assess and manage potential impacts on host communities receiving displaced persons. Host communities will be consulted, informed, and included in planning where relevant. Measures will be taken to avoid or mitigate pressure on housing, services, infrastructure, social cohesion, public health, natural resources, and

community facilities, and to ensure that resettlement does not create adverse impacts for either displaced persons or host communities.

- **Special measures for poor and vulnerable persons:** The Program will identify persons and households that may be disproportionately affected by displacement and will provide differentiated support to avoid further disadvantage. This may include low-income households, elderly persons, women-headed households, persons with disabilities, persons with health conditions, informal workers, tenants, informal occupants, undocumented persons and others who face barriers to restoring their housing, livelihoods, or access to services.
- **Adequate housing and tenure security:** Where physical displacement occurs, affected persons will be provided with access to adequate replacement housing, relocation assistance, basic services, and security of tenure, as relevant to the nature of the impact. Resettlement measures will seek to avoid homelessness, increased informality, loss of access to services, or deterioration in living conditions.
- **Livelihood restoration beyond compensation alone:** For cases involving economic displacement, the Program shall design measures to restore or improve income-generating capacity, production levels, employment opportunities, access to customers, business activity, rental income, or other livelihood sources. Cash compensation alone shall not be considered sufficient where it does not enable affected persons, particularly poor or vulnerable persons, to restore their livelihoods.
- **Participatory planning and meaningful consultation:** Affected persons and communities shall be consulted meaningfully throughout screening, planning, implementation, monitoring, and close-out of resettlement and livelihood restoration measures. Their views will inform eligibility criteria, compensation options, relocation arrangements, livelihood restoration strategies, support for vulnerable persons, and grievance procedures.
- **Disclosure of information:** Information on potential impacts, eligibility, entitlements, compensation, livelihood restoration measures, cut-off dates, consultation processes, and grievance procedures will be disclosed in a timely, accessible, and culturally appropriate manner. Information will be provided early enough to allow affected persons to understand their rights, consider their options, and participate effectively.
- **Gender-responsive and inclusive approach:** Resettlement planning and livelihood restoration will consider the different needs, risks, and preferences of women, men, elderly persons, persons with disabilities, lesbian, gay, bisexual, transgender, and gender-non confirming (LGBTQ) persons, and other vulnerable groups. Women's perspectives will be considered in relation to compensation, housing options, livelihood restoration, tenure documentation, consultation, and grievance redress.
- **Eligibility cut-off date:** A cut-off date will be established, documented, and publicly disclosed to determine eligibility and prevent opportunistic occupation or ineligible claims. The Executing Agency will not be required to compensate or assist persons who occupy or use the project area after the clearly established and disclosed cut-off date.
- **Accessible grievance redress mechanism:** An accessible, confidential, transparent, and timely grievance mechanism will be available to affected persons and communities. It will address concerns related to eligibility, valuation, compensation, relocation, livelihood restoration, vulnerable persons, construction impacts, and other resettlement-related issues. The mechanism will not prevent access to judicial or administrative remedies.

- **Monitoring, evaluation, corrective action, and completion audit:** The Program will monitor the implementation and outcomes of resettlement and livelihood restoration measures. Monitoring will include baseline socioeconomic data, delivery of compensation and assistance, performance of livelihood restoration measures, recovery of living standards and income sources, and support to vulnerable persons. Corrective actions will be implemented where needed, and completion audits will verify whether compensation, resettlement assistance, and livelihood restoration objectives have been achieved. The IDB Guidelines note that completion audits may be required to confirm whether RAP and/or LRP provisions have been met.

These principles will guide the screening, planning, implementation, monitoring, and close-out of all Program activities that may cause physical or economic displacement, ensuring that affected persons are not made worse off and that resettlement and livelihood restoration measures are implemented in accordance with IDB ESPS 5.

3 LEGAL FRAMEWORK

3.1 LEGAL NATIONAL FRAMEWORK

The Bahamas, unlike some jurisdictions with detailed land acquisition and resettlement laws, does not have a standalone, comprehensive resettlement legal framework. This section outlines the current legal framework relevant to the Program, alignment with the ESPS 5 and legislative gaps. Relevant legal aspects of Bahamian law applicable to resettlement and compensation are:

The Constitution of the Commonwealth of The Bahamas (Article 27):

- Protects only legal property owners providing them guarantees protection, due process, compensation, and judicial appeal.
- Informal users or occupants are not considered nor included therefore have no constitutional legal protection.
- Compensation is only for the land not for the livelihood losses.
- No constitutional mandate for livelihood restoration, vulnerability support, or consultation.

Acquisition of Land Act (Ch. 252):

- Provides compensation for land based on fair market value.
- Establishes a legal process for land acquisition, including formal notice and procedural steps for acquisition.
- Provides mechanisms for objections, claims, or appeals related to land acquisition and compensation; but does not establish a broader project-level grievance mechanism covering resettlement, livelihood restoration, vulnerable persons, or non-land impacts.
- Focuses primarily on compensation for land acquisition and does not include measures to restore or improve the livelihoods of economically displaced persons.
- Lack of recognition of informal land users, occupants without formal title or persons without recognizable legal rights or claims to the affected land, therefore no compensation for these groups (tenants, informal occupants, informal landowners).
- Lack of assistance or specific provisions for vulnerable persons or households, such as low-income households, elderly persons, women-headed households, persons with disabilities, or persons with health conditions.
- Absence of transitional assistance, relocation support, moving assistance, or other support required to help physically displaced persons reestablish housing and living conditions.
- No requirement for a Resettlement Action Plan or Livelihood Restoration Plan or public consultation process on livelihood impacts where land acquisition causes physical or economic displacement.
- Lack of provision for monitoring, evaluation, or auditing compensation outcomes or livelihood restoration.

Quieting Titles Act, 1959

Under Bahamian law, long-term occupants without formal land title may acquire legal rights through the doctrine of adverse possession, subject to satisfying the requirements of the Limitation Act (Ch.83), including continuous, exclusive, open and adverse occupation for the

applicable statutory period. Occupation alone does not automatically confer ownership, and any claim to legal title must be determined in accordance with Bahamian law. Therefore, occupants without documentary title who assert long-term occupation should be individually assessed during the RAP census and eligibility verification process

3.2 GAP ANALYSIS BETWEEN BAHAMIAN DOMESTIC LAW AND IDB ESPS 5

The following table presents a gap analysis between the requirements of IDB ESPS 5 and the relevant provisions of Bahamian domestic law, focused on the legal framework governing land acquisition and compensation. The project-specific mechanism column identifies where additional project-level measures will be required to ensure compliance with ESPS 5.

Table 3-1 Gap analysis: IDB ESPS 5 vs. Bahamian domestic law

Resettlement Principle / Element	IDB ESPS 5 Requirement	Applicable Bahamian Law	Gap Analysis	Measures to Address the Gaps
Eligibility and assistance across tenure categories*	ESPS 5 recognizes displaced persons across tenure categories. Persons with no recognizable legal right or claim to the land are not entitled to compensation for the land itself, but, if present before the cut-off date, are eligible for resettlement assistance, adequate housing with security of tenure where physically displaced, and compensation at replacement cost for eligible non-land assets.	Acquisition of Land Act (Ch. 252): Limits compensation strictly to legal titleholders, registered lessees, or those with proven lawful interest.	Local law considers informal, non-paying occupants as trespassers with no rights to compensation or housing.	The project-specific RAP/LRP will apply ESPS 5 eligibility and entitlement requirements together with applicable Bahamian law. Each PAP will be assessed by tenure category and by the type and duration of physical and/or economic displacement. Persons without recognizable legal rights or claims will receive the resettlement assistance and eligible non-land asset compensation required by ESPS 5; land compensation depends on formal legal rights or claims recognized or recognizable under national law.
Valuation & Compensation Standard	Demands compensation at Full Replacement Cost. This includes market value of materials,	Acquisition of Land Act (Ch. 252): Values property based on "market value" at the time of	Bahamian law would pay nothing for "falling apart" structures.	The project must not apply depreciation. The RAP must budget for in-kind replacement

Resettlement Principle / Element	IDB ESPS 5 Requirement	Applicable Bahamian Law	Gap Analysis	Measures to Address the Gaps
	labor to build an equivalent structure, plus transition/moving costs, with *no depreciation* for age.	acquisition. Dilapidated structures are valued at near-zero or demolition cost.	IDB requires providing a safe, newly built asset regardless of previous structural decay.	(providing a structurally sound, safe unit) or cash calculated at modern construction material/labor costs.
Security of Tenure Post-Relocation	Requires that the relocation process results in improved security of tenure for the displaced persons (moving them up the tenure ladder).	Housing Act (Ch. 115) / Crown Lands Act: Relocation relies on discretionary government public housing placement or temporary tenancies, often without formal title transfer.	Local mechanisms do not inherently guarantee permanent legal tenure or ownership for relocated squatters.	The government must provide PAPs with formalized security of housing at a new site, such as a long-term lease.
Provision of Alternative Housing	Prohibits eviction or demolition until adequate alternative housing is physically available, safe, serviced (water, power, sanitation), and ready for occupancy.	Building Regulations Act / Health Services Act: Allows the government to condemn and demolish unsafe/dilapidated structures immediately as a matter of public safety.	The government can legally use "public safety and health hazards" to fast-track demolition before alternative housing is ready.	No demolition can proceed until a "No Objection" is issued by the IDB, verifying that replacement housing is built, fully serviced, and handed over to the PAPs.
Protection of Vulnerable Groups	Requires specific socio-economic assessments to identify and provide targeted assistance to vulnerable groups (elderly, disabled, single mothers, undocumented migrants).	Bahamian Immigration Act: Undocumented non-citizens are subject to immediate detention and deportation; local welfare laws prioritize citizens.	Non-Bahamian informal occupants face immediate eviction and deportation.	The RAP's socio-economic census must screen for vulnerability blindly. All PAPs, regardless of nationality or legal status, must receive safe housing alternatives to prevent homelessness, impoverishment and satisfy IDB human rights safeguards.
Livelihood Restoration	Mandates that the socio-economic status and livelihoods of PAPs are restored to pre-	No domestic statutory mandate exists to restore livelihoods or provide business	Domestic law treats economic displacement as a private	The RAP must include a Livelihood Restoration Plan (LRP), providing moving stipends,

Resettlement Principle / Element	IDB ESPS 5 Requirement	Applicable Bahamian Law	Gap Analysis	Measures to Address the Gaps
	project levels or better, even if their work was informal.	re-establishment stipends for displaced informal workers.	loss; no structural safety nets or business restoration funds are legally required.	transport allowances, or micro-enterprise support if the physical move disrupts PAPs informal income.
Dispute Resolution / Grievance Redress	Requires a free, accessible, project-level Grievance Redress Mechanism (GRM) to resolve disputes outside the formal court system.	Supreme Court of The Bahamas: Property disputes and compensation claims must be adjudicated via formal, costly, and lengthy judicial litigation.	Court litigation is inaccessible to low-income, non-paying occupants due to cost and legal standing restrictions.	The project must fund and operationalize a local GRM committee (including community representatives and executing agency officers) to resolve asset and eligibility disputes within 14 days at no cost to the PAPs.

* For example: Squatter / informal occupant: For purposes of this RLRF, “squatter” is used descriptively for a person who occupies or uses land or a structure without formal documentary title and whose legal right or claim has not been recognized. IDB ESPS 5 does not use “squatter” as an eligibility category; it refers to persons who have no recognizable legal right or claim to the land or assets they occupy or use. If present before the cut-off date, such persons are eligible for the resettlement assistance and compensation for eligible non-land assets required by ESPS 5; where physically displaced, adequate housing with security of tenure is required. Under Bahamian law, an asserted land interest must be determined under applicable law; the Quieting Titles Act, 1959, s.3 permits a person claiming an estate or interest in land to apply to the Supreme Court for determination of title, and the Limitation Act, Ch.83, ss.24-25 addresses adverse possession and vesting. Such persons remain stakeholders for disclosure, meaningful engagement and access to the project GRM.

Currently, the Government of The Bahamas is undertaking a significant modernization of the country’s land administration system through the proposed Registered Land Bill, 2025 and Land Adjudication Bill, 2025[2]. The legislation is intended to transition from the current deeds-based system to a title registration system, improve certainty of land ownership, reduce land disputes, and establish a modern framework for adjudicating and registering land rights. At the time of preparation of this RAP, the Bills had been approved by Parliament and were awaiting commencement following the required constitutional process.

Because of the impending changes to the national legal framework, every project to be financed under the Program should conduct a legal review to include applicable current national law.

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[2] https://opm.gov.bs/bahamaslandreform/

4 CLASSIFICATION OF DISPLACED AND PROJECT AFFECTED PERSONS - VULNERABILITY AND IMPACT

4.1 VULNERABILITY

Although all persons affected by displacement are entitled to be resettled under conditions equivalent to or better than those existing prior to displacement, the measurements, instruments, and procedures to be applied will vary depending on: (i) the severity of the impacts and effects generated by the project; and (ii) the degree of vulnerability of the displaced population.

The MOHLR is required to carry out a vulnerability analysis to classify displaced persons and define the applicable compensation package under this framework, in addition to assessing the project impacts on each affected person, household, or group.

The following table presents the criteria to consider in conducting a vulnerability analysis for displaced persons.

Table 4-1 Classification of displaced persons by level of vulnerability

Level of Vulnerability	Criteria
High	• Displaced persons who suffer loss of land and/or housing and lack the means to replace them. • Displaced persons who do not have formalized land or property tenure or who do not have recognizable rights or claims to the affected land or property. • Displaced persons who suffer loss of economic activities, employment, or other means of livelihood on which they depend for subsistence and who do not have alternative sources of income. • Displaced persons whose livelihoods depend on access to and use of natural resources, or on economic opportunities linked to their current location, and who do not have alternative means to generate income or obtain food, medicine, and/or materials for domestic use. • Displaced persons with low levels of education or functional illiteracy, female headed household, elderly persons, and persons with disabilities. • Displaced persons belonging to other ethnic or religious minorities who experience disproportionate social, economic, or cultural impacts compared with other population groups. • Displaced persons who suffer the loss of social support networks on which they depend for childcare, care of elderly persons, food security, credit, and other needs. • Displaced persons belonging to minority groups (i.e., undocumented migrants, LGBTQ) with weak or no representation or recognition before the State.
Medium	• Displaced persons who depend only partially on the affected land, dwelling, or business and have alternative means of livelihood. • Displaced persons who, although they do not hold formal legal title to the affected land, have tenure rights that are recognizable under national law.

Level of Vulnerability	Criteria
	• Displaced persons who depend only partially on the affected land, dwelling, or business; have an intermediate level of education; have access to services and institutional social support networks; do not belong to ethnic minority groups; and are able to access legal representation services before the State.
Low or not vulnerable	• Persons who do not reside on the affected land or in the affected dwelling, do not use the affected land, and are not economically dependent on it. • Displaced persons who have registered and formally recognized tenure rights, or who carry out duly registered formal economic activities. • Persons with medium to medium-high levels of income and education, who have access to services and State institutions, as well as access to legal representation.

4.2 IMPACTS AND RISKS

The following are direct impacts that may constitute or result from physical and/or economic displacement under ESPS 5:

- Partial or total loss of land or property.
- Partial or total loss of housing and other structures on the property.
- Temporary or permanent restrictions on infrastructure construction or to the productive use of the property.
- Restrictions on access to green areas.
- Interruption of roads or access routes.
- Loss of employment that depends on the current location.

The following are potential downstream risks and adverse socioeconomic consequences associated with involuntary resettlement if displacement is not adequately managed:

- Impoverishment.
- Loss or deterioration of assets.
- Homelessness or loss of shelter.
- Marginalization.
- Unemployment.
- Deterioration in health (physical and mental).
- Food insecurity.
- Reduced educational outcomes for children
- Social disarticulation or weakening of social networks.
- Loss of access to community property and services.

Given the diversity of PAPs, households, and other affected groups, it is recognized that individual circumstances may be complex and involve multiple, overlapping sources of vulnerability that cannot always be captured through a simplified classification system.

Accordingly, vulnerability assessments should not rely solely on predefined categories but should consider the specific socioeconomic conditions, risks, and support needs of each affected person or household. The final determination of vulnerability should be based on the professional judgment of qualified social specialists with demonstrated experience in involuntary resettlement, livelihood restoration, and the identification and assessment of disadvantaged or vulnerable groups. Such assessments should be supported by objective evidence obtained through socioeconomic surveys, consultations, and other relevant information to ensure that appropriate assistance measures are tailored to the needs of each affected person.

4.3 COMPENSATION

The following table provides a reference framework for identifying Project-Affected Persons (PAPs) and their potential eligibility for compensation, resettlement assistance, livelihood restoration, transitional support, social assistance, and other measures under IDB ESPS 5. The table combines three complementary dimensions relevant to resettlement planning: PAP status, type of displacement or impact, and vulnerability or other circumstances requiring differentiated assistance. These dimensions should be considered jointly and should not be interpreted as mutually exclusive classifications.

Accordingly, a PAP may fall under more than one row of the table. For example, a tenant or a person with formal legal rights may experience temporary physical displacement while also experiencing temporary or permanent economic displacement due to loss of employment, business activity, customers, rental income, or another livelihood source. The table is therefore intended as a multidimensional screening and planning tool, rather than a mechanism for assigning each PAP to a single category.

To apply the table, the project should: **(i)** identify the PAP's legal, tenure, occupancy, or livelihood status; **(ii)** determine whether the impact involves physical displacement, economic displacement, or both, and whether it is temporary or permanent; and **(iii)** assess vulnerability and, where applicable, impacts on host communities. These findings, together with presence before the established cut-off date, will inform the applicable entitlements. Final eligibility and measures will be confirmed on a case-by-case basis through the census and socioeconomic survey, asset inventory, livelihood and vulnerability assessments, valuation, and stakeholder consultation, and documented in the applicable RAP and/or LRP.

Table 4-2 Reference Framework for PAP Categories, Displacement Impacts, and Eligibility under IDB ESPS 5

Classification of affected person	Description	Eligibility
Persons with formal legal rights to land or assets	Persons, households, or entities with registered title, leasehold, ownership rights, or other formal legal rights over affected land, housing, structures, or assets.	Eligible for compensation at replacement cost for affected land and assets; resettlement assistance where physical displacement occurs; livelihood restoration and transitional support where income or livelihoods are affected; and social assistance where vulnerability is identified.

Classification of affected person	Description	Eligibility
Persons without formal legal rights but with recognizable claims	Persons who do not have formal title but have claims to land or assets that are recognized or recognizable under national law, administrative procedures, inheritance, long-term occupation, or other legitimate tenure arrangements.	Eligible for compensation and assistance consistent with ESPS 5, subject to verification and presence before the cut-off date. This may include replacement housing, support for tenure regularization, livelihood restoration, transitional support, and social assistance as applicable.
Persons without recognizable legal rights or claims to the land they occupy or use	Informal occupants, users, squatters, or encroachers who occupy or use affected land, housing, or structures before the cut-off date but do not have recognizable legal rights or claims to the land.	Not eligible for compensation for land itself, but eligible for resettlement assistance, compensation at replacement cost for eligible non-land assets, relocation assistance, livelihood restoration, transitional support, and social assistance where needed.
Impact classification - Physical displacement	Persons or households who must relocate or lose housing, shelter, residential land, or residential structures as a result of land acquisition, restrictions on land use, redevelopment, rehabilitation, safety measures, or other Program activities.	Eligible for adequate replacement housing or housing assistance, relocation assistance, moving support, security of tenure, access to basic services, compensation for affected assets at replacement cost, transitional support, and targeted assistance for vulnerable households.
Impact classification - Economic displacement	Persons, households, workers, enterprises, or livelihood actors who lose income sources, assets, access to assets, customers, employment, productive areas, rental income, or other means of livelihood, with or without physical displacement.	Eligible for compensation for loss of assets or income, as applicable; livelihood restoration measures; transitional support; technical assistance; employment or business support; access restoration; and monitoring until livelihoods and standards of living are restored or improved.
Occupancy category - Tenants, renters, leaseholders, and other occupants	Persons or households occupying affected housing, land, rooms, commercial premises, or other spaces under rental, lease, use, or occupancy arrangements, whether formal or informal.	Eligible for relocation assistance, support to secure alternative accommodation or premises, compensation for eligible tenant-owned improvements or assets, transitional support, livelihood restoration where income is affected, and social assistance where vulnerability is identified.

Classification of affected person	Description	Eligibility
Livelihood category - Home-based livelihood actors	Persons who carry out income-generating activities from affected housing or residential premises, including home shops, food preparation, childcare, small services, repairs, rental rooms, or other home-based activities.	Eligible for compensation for affected business assets or verified income losses, support to reestablish activities, transitional support, livelihood restoration measures, and assistance to avoid interruption of income during relocation, housing rehabilitation, or construction works.
Livelihood category - Business owners/operators, formal or informal	Owners or operators of formal or informal businesses affected by land acquisition, relocation, redevelopment, construction disruption, loss of access, loss of customers, or demolition of premises.	Eligible for compensation for affected structures, equipment, inventory, and verified business losses; assistance to relocate or reestablish operations; transitional support; and measures to restore access to customers, suppliers, services, and markets.
Livelihood category - Workers and employees	Wage workers, casual workers, self-employed persons, informal workers, or employees whose employment, income, or access to work is affected by Program activities.	Eligible for livelihood restoration support, transitional income support where justified, employment assistance, skills training, referral to social programs, and targeted assistance where vulnerability is identified.
Impact classification - Loss of access to land, assets, services, customers, or natural resources	Persons or groups who may not lose land or housing directly but lose access to productive areas, community facilities, customers, roads, services, natural resources, or other assets as a result of restrictions or works.	Eligible for measures to restore access, alternative access arrangements, compensation for verified losses, livelihood restoration, transitional support, and social assistance where impacts affect income, living standards, or livelihoods.
Duration classification - Temporary physical and/or economic displacement	Persons, households, businesses, workers, or users experiencing temporary physical displacement (for example, temporary relocation) and/or temporary economic displacement (for example, temporary loss of access, income, customers, or services) due to Project activities.	Eligible measures depend on the impact: temporary physical displacement may require temporary accommodation, moving and return assistance; temporary economic displacement may require compensation for eligible losses, access restoration, transitional support, and livelihood restoration measures until normal conditions are reestablished.

Classification of affected person	Description	Eligibility
Cross-cutting factor - Poor and vulnerable PAPs/households	Persons or households who may be disproportionately affected or less able to restore their livelihoods and living standards, including low-income households, women-headed households, elderly persons, persons with disabilities, persons with health conditions, informal occupants, informal workers, tenants, undocumented persons and persons with limited literacy or access to information.	Eligible for differentiated and targeted assistance in addition to standard entitlements. This may include priority support, accessible information, assistance with documentation, additional relocation or transitional support, tailored livelihood measures, accompaniment in consultation and grievance processes, and post-relocation or post-impact monitoring.
Cross-cutting factor - Host communities	Communities or households that receive physically displaced persons, either temporarily or permanently, or that may be affected by increased pressure on housing, infrastructure, services, land, natural resources, public health, or social cohesion.	Eligible for consultation, information disclosure, access to the grievance mechanism, and mitigation measures where resettlement creates adverse impacts on services, infrastructure, resources, or community conditions.
Eligibility timing - Persons entering the project area after the cut-off date	Persons who occupy, use, build on, or establish new activities in the project area after the cut-off date has been clearly established, documented, and publicly disclosed.	Not eligible for compensation or resettlement/livelihood restoration assistance for new occupation, structures, or activities established after the cut-off date. Any emergency or humanitarian response would be considered separately, as appropriate.

Note: Eligibility and entitlements will depend on the nature, duration, severity, and location of impacts, and on whether the affected person is physically displaced, economically displaced, temporarily affected, vulnerable, or part of a host community. Persons who occupy or use a project area after a clearly established and publicly disclosed cut-off date are not eligible for compensation or assistance for new occupation, structures, or activities established after the cut-off.

4.4 COMPENSATION ALTERNATIVES AND ASSISTANCE

If a project under this Program causes physical or economic displacement, the MOHLR will ensure that displaced persons are able to exercise their right to choose among feasible resettlement options, livelihood restoration measures, compensation packages, and assistance measures.

4.4.1 Alternative Resettlement Packages

The following alternatives may be considered case-by-case in the project RLRPs, depending on the impacts and risks generated, the level of vulnerability, and the specific circumstances of the affected groups:

- Provision of subsidized housing, or other infrastructure within the same redevelopment area or at another feasible location to be agreed by the parties.

- Socioeconomic support for the relocation of household goods and belongings, animals, and other movable assets, as well as support for preparation of the new site and connection to basic public utilities.
- Assistance to access social support networks in cases where relocation to another site if required.
- Technical assistance to restore the affected economic activity within new location, or on another location to be agreed by the parties.
- Technical assistance and training for job search or development of alternative income-generating activities for affected persons who lose employment as a result of Project activities.
- Financial advisory support if final compensation package is cash.

4.4.2 In Kind Compensation

In-kind compensation may be provided through the direct provision of a housing unit by the MOHLR, followed by the transfer of ownership or lease to the affected person, as applicable.

To reduce risks of impoverishment, asset deterioration, and marginalization, particularly for vulnerable displaced persons, the MOHLR will consider, as an alternative to cash compensation, the provision of subsidized housing until unemployed PAPs enter the workforce.

4.4.3 Cash Compensation

The IDB recognizes that cash compensation is not typically the best option, as cash alone for poor and vulnerable displaced persons is generally insufficient to ensure the restoration or improvement of affected living conditions and livelihoods. However, cash compensation may be appropriate or acceptable for undocumented PAPs.

In cases in which it is used, cash compensation should be complemented by in-kind compensation, resettlement assistance, livelihood restoration measures, transitional support, legal and social assistance, and other differentiated measures necessary to enable displaced persons to reestablish adequate housing, income sources, and standards of living in accordance with IDB ESPS 5.

Therefore, although cash compensation is an option to which affected persons may be entitled, the MOHLR will encourage in-kind compensation or other replacement-based options that ensure the replacement of affected assets, housing, and livelihood activities, and reduce risks of impoverishment, asset deterioration, marginalization, and other adverse impacts associated with displacement.

4.4.4 Compensation Packages

The provision of social, economic, psychological, technical, and legal assistance to displaced persons is a key element for achieving the objectives of the RLRP. Depending on the specific circumstances, the impacts generated, and the level of vulnerability of affected persons, the MOHLR will consider the following types of assistance:

- **Social assistance** to support PAPs ability to optimize benefits (employment preference, subsidized housing, etc.) from the new neighborhood revitalization.
- **Technical and economic assistance** to restore affected businesses, or other economic activities, to secure new employment, or to undertake new income-generating activities.
- **Legal assistance** for the registration and formalization of businesses.

- **Special assistance** to ensure that highly vulnerable individuals or groups have access to government services or special programs available to them.

Where assistance packages are implemented by other government agencies, private entities, or civil society organizations with relevant competence, the MOHLR will establish the necessary inter-institutional agreements or memoranda of understanding, including corresponding financing arrangements.

5 ELEGIBILTY AND CUT-OFF DATE

The purpose of establishing a cut-off date for the resettlement of involuntarily displaced persons is to determine which groups are eligible for resettlement, compensation, livelihood restoration, and assistance.

The cut-off date is also a measure to help prevent opportunistic occupation or encroachment in areas required by a project, which could create additional risks for project implementation.

The cut-off date should be established once the demographic and socioeconomic census of displaced persons and the inventory of affected land, assets, and improvements have been completed. After the cut-off date, persons who build on, occupy, or use land or structures affected by a project will not be eligible for resettlement, livelihood restoration, compensation for losses (including improvements) or any form of project-related social assistance.

The cut-off date must be widely disclosed in the project's Area of Influence through appropriate written and verbal means, including information on the period during which the cut-off date restriction will apply and use a gender-sensitive communication strategy.

The document establishing the cut-off date shall be formally notarized, published and registered as an executive resolution of the MOHLR.

6 GENDER APPROACH

The RLRF includes the application of a gender-responsive approach consistent with IDB ESPS 5 and ESPS 9 on Gender Equality. This requires resettlement planning to identify and address the differentiated impacts, risks, needs, and priorities of project affected women.

Under ESPS 5, women's perspectives must be obtained and considered in all aspects of resettlement planning and implementation, including compensation, replacement housing, livelihood restoration, consultation, and monitoring.

In practical terms, resettlement and livelihood restoration must identify how women, men, and people of diverse gender identities may be affected differently, and must design compensation, relocation, consultation, and livelihood measures accordingly.

To ensure meaningful participation of women, women's groups, and people of diverse gender identities in resettlement-related consultations and decision-making, the MOHLR should treat gender as a cross-cutting issue and apply the following procedures:

1. Collect gender-disaggregated socioeconomic baseline information as part of the census, socioeconomic survey, and livelihood assessment, in order to identify differentiated impacts, needs, risks, and restoration measures for women, men and people of diverse gender identities.
2. Pay particular attention to including and responding to the concerns of women and people of diverse gender identities in the affected community, ensuring that their views are considered in resettlement planning, livelihood restoration, compensation, consultation, and monitoring.
3. Consider and respond to women's and people of diverse gender identities' recommendations and expectations regarding replacement or improvement of land, housing, economic activities, social support networks, access to services, and compensation options.
4. Establish mechanisms to enable the participation of affected women, and people of diverse gender identities considering mobility constraints, consultation schedules compatible with care and livelihood responsibilities, cultural barriers, literacy, safety, and other factors that may limit participation. The Program will ensure women's representation in decision-making bodies related to resettlement, including through quotas, voting requirements, or other appropriate measures.
5. Ensure women's participation and people of diverse gender identities in direct Program benefits, including training, employment, livelihood restoration, income-generation, and other social or economic opportunities generated by the Program.
6. Adopt a gender-equity approach throughout the resettlement process, ensuring that women's voices are reflected in planning, implementation, monitoring, and final evaluation of resettlement and livelihood restoration outcomes.
7. Assess and manage gender-based violence risks The IDB ESPS Guidelines recognize that resettlement can increase stress and may increase violence against women, children, and people of diverse gender identities. Compensation that increases women's economic empowerment can also alter household power dynamics and potentially trigger violence. The MOHLR should define actions to detect and minimize gender-based violence risks.

8. Adopt a gender-sensitive and confidential Grievance Redress Mechanism, especially for Sexual and Gender-Based Violence (SGBV). ESPS 9 requires effective grievance mechanisms that minimize the reporting burden on survivors, provide services in a gender-sensitive manner, reduce reprisal risks, and include specific procedures for SGBV, including confidential reporting and safe, ethical documentation.

7 INDICATIVE ENTITLEMENTS AND MITIGATION MEASURES

This section translates the eligibility framework established in Section 4.3 into indicative entitlements and mitigation measures according to the type of impact identified. It covers three distinct but complementary responses under ESPS 5: (i) compensation for loss of land and other assets at replacement cost; (ii) resettlement and transitional assistance for physical displacement; and (iii) livelihood restoration measures for economic displacement. Cross-cutting measures, including differentiated assistance for vulnerable persons, stakeholder engagement, grievance redress, and monitoring, may apply to any of these situations.

For purposes of this Framework, livelihood restoration is not synonymous with compensation. Livelihood restoration applies where economic displacement affects income sources, income-earning capacity, productive activities, employment, or access to assets and resources on which livelihoods depend. Compensation addresses eligible losses, while livelihood restoration and other assistance are provided, where required, to enable economically displaced persons to restore or improve their livelihoods and standards of living in accordance with ESPS 5.

Table 7-1 complements Table 4-2 but serves a different purpose. Table 4-2 provides the reference framework for identifying PAP status, displacement impacts, and potential eligibility, while Table 7-1 links the type of impact identified to the indicative compensation, resettlement assistance, livelihood restoration, and other support measures that may be required. Final entitlements and measures will be determined for each project through screening, census and socioeconomic assessment, asset inventory, livelihood and vulnerability assessments, valuation, and stakeholder consultation, considering the disclosed cut-off date, and will be documented in the applicable RAP and/or LRP.

Table 7-1 Indicative impact-to-entitlement and mitigation measures matrix

Type of impact identified	Affected persons / situations	Restoration measures and/or programs to consider	Main ESPS 5 Purpose
Permanent loss of housing or shelter	Households losing houses, rooms, informal shelters, residential structures, or requiring permanent relocation.	Physical Resettlement Program: adequate replacement housing; relocation assistance; moving support; security of tenure; access to basic services; restoration of community infrastructure; support for vulnerable households.	Restore or improve living standards and avoid homelessness, tenure insecurity, or further informality.
Temporary relocation during works	Households temporarily moved because of rehabilitation, construction, safety risks, utility works, or housing repairs.	Temporary Relocation and Transitional Support Program: temporary accommodation or rental support; transport and moving assistance; continuity of access to schools, health services, employment, and utilities; return arrangements after works.	Ensure temporary displacement does not reduce living conditions or access to services.

Type of impact identified	Affected persons / situations	Restoration measures and/or programs to consider	Main ESPS 5 Purpose
Permanent loss of land	Owners, persons with recognizable claims, customary or long-term users, or eligible occupants affected by land acquisition.	Land Compensation and Replacement Program**:** compensation at full replacement cost; replacement land where feasible; transaction costs; registration support; land regularization support where applicable.	Replace affected land and avoid economic or tenure-related impoverishment.
Loss of structures, improvements, or non-land assets	Owners, tenants, informal occupants, businesses, or users losing structures, fences, extensions, septic systems, utilities, crops, trees, or other improvements.	Asset Valuation and Compensation Program: asset inventory; valuation at replacement cost without depreciation; compensation for structures and improvements; compensation for eligible non-land assets, including for persons without formal land title.	Ensure affected assets can be replaced or restored.
Loss of business premises or commercial activity	Formal or informal businesses, vendors, shops, service providers, or enterprises affected by relocation, demolition, access restriction, or construction disruption.	Business Restoration Program: compensation for affected business assets; reestablishment or relocation support; replacement premises where feasible; income-loss compensation; support to restore customers, suppliers, permits, and market access.	Restore business operations and income-earning capacity.
Loss of employment or wage income	Employees, casual workers, informal workers, domestic workers, service workers, or self-employed persons affected by business closure, relocation, or construction impacts.	Employment and Income Restoration Program: transitional income support; employment referral; skills training; job placement; priority access to project-related employment where feasible; social protection referrals.	Restore wage-based or informal income sources.
Loss of home-based livelihoods	Households using homes for shops, rental rooms, childcare, food preparation, tailoring, repairs, storage, or other income-generating activities.	Home-Based Livelihood Restoration Program: replacement housing design that allows livelihood activities; compensation for income interruption and business assets; support to reestablish activities; permits or equipment support where needed.	Restore household income linked to housing and avoid hidden livelihood losses.

Type of impact identified	Affected persons / situations	Restoration measures and/or programs to consider	Main ESPS 5 Purpose
Loss of rental income or housing-related income	Owners or households losing rental rooms, units, informal rentals, or other housing-based income.	Rental Income Restoration Program: compensation for verified income loss; transitional support; assistance to replace rental capacity where feasible; monitoring of income restoration.	Restore income sources linked to housing assets.
Loss of access to land, assets, customers, roads, services, or natural resources	Persons who may not relocate but lose access to productive areas, customers, roads, services, markets, community facilities, or natural resources.	Access Restoration Program: alternative access routes; temporary access plans; signage and traffic management; compensation for verified losses; livelihood support where access loss affects income or living standards.	Restore access or provide equivalent alternatives and compensation.
Temporary economic displacement during construction	Businesses, workers, vendors, households, or service users affected by road closures, restricted access, dust, noise, utility disruption, or reduced customer flow.	Construction-Phase Livelihood and Access Management Program: temporary access maintenance; business interruption compensation; advance notice; traffic and pedestrian management; utility continuity measures; transitional support.	Prevent temporary impacts from causing lasting income or livelihood losses.
Impacts on poor or vulnerable persons	Low-income households, women-headed households, elderly persons, persons with disabilities, persons with health conditions, tenants, informal occupants, persons with limited literacy, or informal workers.	Vulnerable Persons Assistance Program: differentiated assistance; priority support; accessible information; help with documentation; accompaniment during valuation, compensation, relocation, GRM, and livelihood restoration; additional transitional support; post-relocation monitoring.	Prevent disproportionate impacts and ensure vulnerable persons can access benefits and remedies.
Gender-differentiated impacts	Women, women-headed households, caregivers, home-based workers, informal workers, and persons affected by gender-based barriers or risks.	Gender-Responsive Resettlement Program: gender-disaggregated baseline data; separate or tailored consultations; joint compensation or tenure documentation where applicable; support for women's livelihoods; SGBV risk management; gender-sensitive GRM.	Ensure women's views, rights, livelihoods, safety, and access to compensation are protected.

Type of impact identified	Affected persons / situations	Restoration measures and/or programs to consider	Main ESPS 5 Purpose
Impacts on host communities	Communities receiving displaced persons temporarily or permanently, or affected by additional demand on housing, services, infrastructure, land, or natural resources.	Host Community Support Program: consultation with host communities; assessment of service and infrastructure pressure; mitigation measures for community facilities, public health, social cohesion, natural resources, and local services.	Avoid transferring resettlement impacts to host communities.
Disputes over eligibility, valuation, compensation, relocation, or livelihood restoration	PAPs, displaced persons, host communities, tenants, informal occupants, businesses, or vulnerable persons raising complaints.	Grievance Redress Mechanism (GRM): accessible, transparent, timely, confidential complaint channels; appeals process; tracking and reporting; special access measures for vulnerable persons and SGBV-related grievances.	Provide early, fair, and accessible resolution of resettlement-related concerns.
Delays, incomplete compensation, or insufficient livelihood recovery	Any project where compensation, relocation, or livelihood restoration outcomes are delayed or not achieved.	Monitoring, Corrective Action, and Completion Audit Program: baseline indicators; performance monitoring; outcome monitoring; livelihood recovery tracking; corrective action plans; completion audit or close-out review.	Verify that compensation, resettlement, and livelihood restoration commitments have been fulfilled.

The specific measures to be applied in each project will be determined through ESPS 5 screening and detailed planning.

8 ASSET VALUATION AND COMPENSATION

The RLRF is be based on the principle of compensation at full replacement cost, consistent with IDB ESPS 5. This means that affected land, housing, structures, improvements, productive assets, business assets, and other eligible losses will be valued at a level sufficient to replace the lost asset without depreciation, and including transaction costs such as taxes, registration fees, transfer costs, legal fees, and any other costs necessary to restore the affected asset or activity.

The following table presents the valuation principles and methodologies to be applied where Program activities result in land acquisition, restrictions on land use, physical displacement, economic displacement, temporary impacts, or livelihood losses. The specific valuation methodology and compensation measures shall be determined on a project-specific basis and informed by the census, socioeconomic survey, asset inventory, livelihood assessment, eligibility cut-off date, and any additional studies required to assess replacement values.

Consistent with IDB ESPS 5, compensation is to be provided at full replacement cost, together with any applicable transitional assistance, livelihood restoration, and other support measures necessary to restore, and where feasible improve, the living standards and livelihoods of affected persons. All compensation and required assistance shall be provided prior to physical or economic displacement, restrictions on land use or access, or the commencement of civil works in the affected area.

Table 8-1 Valuation methodology reference

Valuation item / impact	Valuation methodology	Compensation principle under ESPS 5
Land	Determine replacement cost using comparable land with similar location, use, productive potential, access, and services. Include transaction costs, registration fees, taxes, and administrative costs.	Compensation should enable replacement of land with equivalent or better characteristics. Where livelihoods are land-based, land-based replacement should be prioritized where feasible.
Housing and residential structures	Value housing, rooms, shelters, extensions, and residential structures based on the cost of constructing replacement housing of equivalent or better standard, without depreciation.	Physically displaced persons should receive adequate replacement housing, relocation assistance, and security of tenure. Households should not be left worse off.
Non-residential structures and improvements	Value shops, fences, walls, utility connections, storage areas, paving, wells, septic systems, productive installations, and other improvements at replacement or reconstruction cost.	Eligible non-land assets should be compensated at replacement cost, including assets held by persons without formal legal rights to land.
Tenants' improvements and personal assets	Identify and value improvements made by tenants or renters, movable assets, fixtures, and other tenant-owned investments.	Tenants and renters should receive compensation for eligible assets they own, plus relocation or transitional assistance where physical or economic displacement occurs.

Valuation item / impact	Valuation methodology	Compensation principle under ESPS 5
Businesses and commercial activities	Value business assets, equipment, inventory, relocation costs, reinstallation costs, and verified temporary or permanent loss of net income.	Business owners and operators should be assisted to reestablish operations and restore income. Compensation alone is not sufficient where livelihoods are not restored.
Wage-based and informal livelihoods	Assess verified income losses from employment, casual work, informal trade, services, or other income sources affected by relocation, access restrictions, or construction disruption.	Economically displaced persons should receive livelihood restoration support and transitional assistance for the period needed to restore income-earning capacity.
Home-based livelihoods	Identify impacts on income-generating activities carried out from the home, such as small shops, food preparation, rental rooms, childcare, repairs, or services.	Replacement housing and livelihood measures should allow home-based activities to continue or be reestablished.
Rental income	Assess loss of rental rooms, units, or other housing-related income based on verified income history or reasonable local market estimates.	Loss of income sources should be mitigated through compensation, transitional support, and livelihood restoration measures.
Crops, trees, and productive assets	Value affected crops, trees, gardens, productive plants, and related assets based on replacement cost, lost production, maturity, and time required to restore production.	Compensation should cover market-oriented and subsistence production where affected.
Temporary impacts	Assess temporary relocation, loss of access, business interruption, service disruption, or temporary livelihood losses for the expected duration of the impact.	Temporary impacts are displacement impacts under ESPS 5 and require mitigation, compensation, and/or transitional support.
Access restrictions	Assess loss of access to roads, customers, services, natural resources, community facilities, productive areas, or other livelihood-related assets.	The preferred approach is to restore access. Where this is not possible, alternative access, compensation, or livelihood restoration measures should be provided.
Vulnerable persons	Identify additional costs, barriers, and risks faced by vulnerable persons, including low-income households, women-headed households, elderly persons, persons with disabilities, informal occupants, and persons with limited literacy.	Differentiated assistance should be provided in addition to standard entitlements where needed to avoid disproportionate impacts or further impoverishment.
Relocation and transition costs	Calculate moving costs, temporary accommodation, transport, reconnection to utilities, school or service access, business reinstallation, and other transitional	Relocation assistance and transitional support should be sufficient to restore living conditions and livelihoods.

Valuation item / impact	Valuation methodology	Compensation principle under ESPS 5
	expenses.	
Transaction costs	Include legal fees, valuation fees, registration fees, taxes, permits, transfer costs, bank charges, and other administrative costs required to replace assets.	Compensation at replacement cost should not be reduced by transaction costs or fees necessary to restore affected assets.

This valuation table is a reference; it should be detailed and adapted for each project.

9 PROJECT-SPECIFIC RESETTLEMENT AND LIVELIHOOD RESTORATION PLANNING

Table 9-1 Key steps for project-specific resettlement planning

Steps	Indicative Activities
1. Preliminary Assessment	Identification and assessment of PAPs subject to physical and/or economic displacement.
	Identification and assessment of host community (if applicable)
	Baseline study of the population located in the DAI.
	Identification and assessment of the project's social risks and impacts.
2. Institutional Arrangement and Capacity	Designation of a dedicated internal team for preparation and implementation of the RAP/LR plan.
	Staff training (land acquisition, involuntary resettlement, livelihood restoration, stakeholder engagement, confidentiality and grievance management).
	Identify relevant government agencies, NGOs, and service providers and establish coordination mechanisms (including MOUs, where appropriate) to deliver livelihood restoration, housing assistance, social services, employment support, and other measures identified in the RAP/LRP.
3. Socioeconomic Surveys and Asset Inventory	Demographic and Socioeconomic Census of affected households, groups, and other project-affected persons.
	Inventory of properties, assets, structures, improvements, and economic activities affected by the Project.
	Cadastral survey of affected plots or properties.
	Land tenure assessment of affected properties, including formal rights, recognizable claims, and informal occupation or use.
	Valuation of affected real estate, non-land assets, improvements, and affected economic activities at replacement cost, as applicable by the relevant professional.
	Vulnerability analysis of affected persons, households, and groups to be displaced or otherwise affected.
4. Resettlement Planning and Government decisions	Establishment and disclosure of the eligibility cut-off date.
	Finalize compensation packages.
	GRM resolution strategy
	Adjustment of the proposed plan based on consultation with PAPs and preparation of the final RAP/LRP.

Steps	Indicative Activities
5. RAP/LRP Review and Approval	Submission of the RAP/LRP to IDB involved in the project for review and no objection, as applicable.
6. RAP/LRP Implementation, Monitoring and Completion	Payment of compensation and assistance; implementation of livelihood restoration measures; physical relocation (if applicable); post-relocation support; monitoring and evaluation; completion audit (where required); corrective actions and close-out.
7. Stakeholder Engagement and Information Disclosure (Crosscutting throughout all the stages)	Disclosure of Project impacts related to involuntary resettlement, including physical displacement and economic displacement.
	Disclosure of information on the demographic and socioeconomic census and the inventory of affected assets and businesses.
	Information disclosure and consultation with affected persons on eligibility criteria, resettlement options, livelihood restoration measures, compensation, and assistance.
	Disclosure of the eligibility cut-off date, the grievance redress mechanism (GRM), and mechanisms for feedback and participation of affected persons during plan implementation.
	Disclosure of the final RAP/LRP.

10 CONSULTATION, PARTICIPATION AND DISCLOSURE

Before the acquisition of land for a project takes place, or before imposing restrictions on land use that may result in physical or economic displacement, the MOHLR will design and implement a project-specific PAP Consultation Plan for displaced persons, covering all steps described in Section 9 of this RLRF. The Consultation Plan will include specific provisions tailored to the characteristics and needs of the affected persons and groups identified.

Information disclosure and consultation with displaced persons will be an iterative process, beginning at the initial design stage of the RAP/LRP, and continuing through completion of Plan implementation and ex-post evaluation of its outcomes.

For this purpose, the MOHLR will use a range of communication channels, including meetings with community leaders, meetings with directly affected groups, written publications, radio communications, and digital media. These channels will be used to ensure two-way communication between affected groups and the assigned resettlement personnel.

The MOHLR will ensure the consultation and participation of affected persons in decision-making processes related to resettlement. This will include disclosure and consultation on the draft of the RAP/LRP, and other related plans, so that the final document reflects inputs provided by PAPs, the results of consultations, and the records of agreement on compensation and assistance packages.

In general, the consultation process will have the following phases:

- **Orientation and information disclosure.** This phase will provide information about the Project, the need for resettlement of households to be displaced, and responses to concerns raised by affected persons. During this phase, it is recommended that MOHLR announce the date or period for the census of persons, properties, and structures, as well as the cut-off date that will determine eligibility under the Plan and the non-eligibility of new persons occupying or using the affected area after that date.
- **Consultation on baseline results and proposed measures.** Once the baseline study of affected persons, properties, and structures has been completed, the MOHLR will disclose information to the PAPs and will present the proposed Plan, including options for restoring living conditions and livelihoods. MOHLR will receive and address concerns and questions from affected persons. During this phase, the lead executing agency will also present the GRM for displaced persons.
- **Disclosure of the final Plan and confirmation of agreements.** The MOHLR will present the RLRP, including the specific procedures agreed with affected persons, the detailed action plan, and the mechanisms for feedback and participation during Plan implementation. This phase will also include the signing of agreement records, as applicable, including agreements on compensation, resettlement assistance, livelihood restoration, and other support measures.

11 GRIEVANCE REDRESS MECHANISM

The Program may use the same project/community Grievance Redress Mechanism (GRM) established under ESPS 10 to address ESPS 5 grievances, provided it is adapted with the procedures, responsibilities and capacity needed to receive and resolve resettlement-related concerns. These procedures shall cover, as applicable, eligibility, valuation, compensation, relocation, livelihood restoration, temporary impacts, and concerns raised by displaced persons and host communities. The MOHLR will remain responsible for ensuring that the GRM is operational and appropriately resourced.

The GRM shall be established as early as possible, be readily accessible to affected persons and host communities, and provide a fair, transparent and timely process at no cost and without retribution. It shall not impede access to judicial or administrative remedies. Resettlement-related grievances requiring specialized review may be routed through dedicated internal procedures or qualified personnel within the same GRM.

The management of grievances may not be delegated to the Project works contractor or to any other third party, unless agreed with the IDB. This mechanism will be independent from the team responsible for implementing the RAP/LRP, and all costs incurred in resolving complaints, claims, or conflicts will be covered by the MOHLR.

The GRM will include at a minimum, the following elements:

1. A program for broad dissemination among PAPs, explaining the GRM, access channels, and response timeframes.
2. A local office or kiosk near the Project Area of Influence, with complaint boxes in publicly accessible areas, a dedicated telephone number or WhatsApp chat, or any combination of these channels considered most appropriate for receiving grievances allowing for either oral or written communication of grievances.
3. A standard grievance and complaint registration form.
4. A system for registering and managing anonymous grievances.
5. A clear and expedited procedure for processing and resolving grievances and complaints.
6. A grievance classification system based on the associated level of risk, with response timeframes defined according to the level of risk and seriousness of the grievance.
7. A response system that clearly explains the admissibility or relevance of the grievance, the investigation or analysis carried out for each case, and the remedial action taken.
8. A record system documenting whether the affected person is satisfied or dissatisfied with the solution provided.
9. Management indicators.
10. A monitoring and evaluation system for the management of grievances and complaints.
11. A system for periodic reporting, monthly or quarterly as specified in the RLRP.

The grievance management system, procedures, and criteria will be easily accessible to affected persons and will be culturally and linguistically appropriate.

Where necessary, the MOHLR will establish a special committee with sufficient authority to address and resolve: (i) grievances that, due to their nature, present a high level of material or reputational risk for affected persons, the MOHLR or the IDB; and (ii) grievances not resolved at first instance that require mediation or intervention by other State institutions.

The MOHLR will maintain an updated file of grievance cases, including the processing and resolution of each case, and will periodically inform the Project management team and IDB about grievances with a high level of material and/or reputational risk, the treatment given to each case, and the resolution reached.

12 INSTITUTIONAL AND ORGANIZATIONAL ARRANGEMENTS

The MOHLR will be responsible for applying this Framework and ensuring that all land acquisition and resettlement activities comply with the requirements of ESPS 5 and other applicable ESPS, as well as overseeing necessary institutional coordination.

The RLRF requires strong coordination among key institutional stakeholders from the national and local levels and from utility agencies responsible for environmental management, development planning, housing, infrastructure, public health, labor regulation, social and family affairs, disaster risk management, land administration, cultural heritage protection, and utility service provision.

Other public institutions that will have responsibilities to be defined based on the assigned tasks are:

- Ministry of Environment and Natural Resources
- Disaster Risk Management Authority
- Department of Gender and Family Affairs
- Department of Labor
- Department of Lands and Surveys
- Ministry of Finance
- Ministry of Grand Bahama

12.1 RESETTLEMENT TRAINING AND LINKED ESPS

Training the Project professionals on resettlement matters is essential to ensure compliance with the applicable environmental and social standards, including IDB ESPSs 5 and 9, as the ESPS compliance is a requirement for Bank financed operations.

If a project causes involuntary resettlement, whether through physical displacement or economic displacement, MOHLR will ensure that decision-making staff and personnel involved in the establishment of land and real estate acquisition, asset valuation, compensation, and resettlement of displaced persons receive training from qualified resettlement specialists. This is consistent with ESPS 5, which applies to land acquisition and restrictions on land use that may result in physical or economic displacement and requires these impacts to be managed through appropriate planning and mitigation measures.

The training will focus on the international resettlement standards applicable to the Project, ESPSs 5 and 9 (as incorporated, discussed above), the mandate, scope, opportunities, and limitations of applicable national legislation, strategies to address gaps between national law and IDB requirements, and internationally recognized good practice in land acquisition, compensation, resettlement assistance, livelihood restoration, stakeholder engagement, grievance management, monitoring, and completion verification.

13 MONITORING AND EVALUATION

The Monitoring and Evaluation mechanism will guide and verify the implementation of the RPLR Plan, ensuring that all commitments are carried out in accordance with IDB ESPS 5 and that displaced persons are able to restore or improve their livelihoods and living standards. The monitoring will assess whether compensation, resettlement assistance, livelihood restoration measures, transitional support, assistance to vulnerable persons, consultation, and grievance redress are implemented effectively, transparently, and in a timely manner.

The objectives for establishing a monitoring and evaluation system are:

- verifying the implementation of project components and scheduled actions, including relocation of displaced persons, livelihood restoration, compensation, restoration of social support networks, social, technical and legal assistance, and special programs for displaced groups;
- verifying compliance with the RLRP, the agreements signed with displaced persons, and the resettlement standards of project financing agencies;
- identifying, in a timely manner, difficulties and opportunities for Plan implementation;
- identifying, in a timely manner, unforeseen changes among population groups located in the Project's DAI;
- monitoring the process of restoring the socioeconomic conditions of displaced persons; and
- formulating corrective measures in the event of deviations or non-compliance.

To verify the level of restoration of the socioeconomic conditions of displaced persons, at minimum the following variables will be monitored:

- Housing: quality, location, and size.
- Public services: water, electricity, telephone, transport, and solid-waste collection.
- Access to education and health: distance to facilities, transport costs, and travel time.
- Level of satisfaction of displaced persons.

For monitoring the restoration of displaced productive activities, at minimum the following dimensions will be considered:

- Income: average monthly household income and income stability.
- Performance of the new economic activity: distance from the household, access to suppliers and buyers, changes in operating costs, working conditions, and safety.

Monitoring will be a continuous and systematic process of observation, analysis, verification, and adjustment, with special attention given to poor and vulnerable persons, women-headed households, elderly persons, persons with disabilities, tenants, informal occupants, undocumented and economically displaced persons.

13.1 FREQUENCY AND DURATION OF MONITORING

It is recommended that monitoring of resettlement operations and restoration of living conditions be carried out on a quarterly basis. Although the duration of monitoring will depend on the complexity and characteristics of the resettlement and livelihood restoration process, the vulnerability and adaptive capacity of affected persons, and other relevant factors. However, the RLRP should define and justify the monitoring period required for each specific project.

14 COMPLETION AUDIT

The objective of the Completion Audit is to determine whether implementation of the RAP and, where applicable, LRP, has achieved the objectives of ESPS 5 by restoring, and where feasible improving, the livelihoods and living standards of the PAPs.

A Completion Audit shall be carried out once mitigation measures have been substantially completed and implemented and displaced persons have been provided adequate opportunity and assistance to sustainably restore their livelihoods. The MOHLR shall ensure that completion of the RAP/LRP is verified through the preparation and approval of a Completion Audit to formal close-out of the resettlement process.

The Completion Audit shall verify whether compensation, resettlement assistance, livelihood restoration, transitional support, consultation, grievance redress, and support to vulnerable persons have been implemented in accordance with the RAP/LRP, and whether displaced persons have had adequate opportunity and assistance to restore their livelihoods and standards of living. Any outstanding gaps identified through the completion audit will be addressed through a corrective action plan before close-out.

The completion audit is more in-depth than regular monitoring and must include, at minimum:

- a review of all mitigation measures for physical and/or economic displacement;
- a comparison of outcomes against baseline conditions;
- a comparison of implementation outcomes against agreed objectives;
- a conclusion on whether monitoring can end; and
- a Corrective Action Plan listing outstanding actions needed to meet ESPS 5 objectives (when needed). Close-out occurs only after all corrective actions are addressed.

ESPS 5 requires that competent resettlement professionals undertake the completion audit upon conclusion of the monitoring period. Depending on the scale and/or complexity of physical and economic displacement, the MOHLR may need to consider commissioning an external reviewer to conduct the completion audit.

The Completion Audit should bring the MOHLR responsibility for resettlement, compensation, livelihood restoration, and development benefits to a close.

15 MINIMUM CONTENT FOR A CENSUS AND SOCIO-ECONOMIC SURVEY

A Census and Socio-Economic Survey is a mandatory and fundamental step in the preparation of any project triggering environmental and social performance standards. This is most critical under IDB ESPS 5: Land Acquisition and Involuntary Resettlement. For projects in The Bahamas where reliable and sufficiently detailed census information on potentially affected households, persons, businesses, assets, and livelihoods is not available, project-specific primary data collection is necessary to establish an accurate baseline. ESPS 5 requires a census where involuntary resettlement is unavoidable in order to identify displaced persons, determine eligibility for compensation and assistance, discourage ineligible claims, and establish a cut-off date where appropriate. The IDB also emphasizes that a robust demographic census is central to determining the nature and scale of impacts on households and businesses and provides the foundation for monitoring whether affected persons receive appropriate compensation and assistance.

The Census and Socio-Economic Survey should identify all Project-Affected Persons (PAPs) and establish the nature, magnitude, severity, and duration of the impacts they may experience. Therefore serves several related purposes: it establishes who is affected and how; documents tenure and occupancy status; inventories affected assets; identifies income sources and livelihood dependencies; assesses vulnerability and differentiated impacts; provides information for establishing eligibility and entitlements; supports valuation, compensation, resettlement assistance, and livelihood restoration measures; and establishes the baseline against which restoration outcomes can subsequently be monitored and evaluated. Particular attention should be given to persons who may be disadvantaged or vulnerable and may require differentiated assistance. The IDB ESPF emphasizes social inclusion, non-discrimination, gender equality, stakeholder engagement, and differentiated measures for vulnerable groups.

This section outlines the minimum content of the Census and Socio-Economic Surveys under BH-L1064. The scope and level of detail should be adapted to the location, type and scale of the project, characteristics of the affected population, tenure arrangements, type and severity of physical and/or economic displacement, livelihood patterns, vulnerability conditions, and information needed to prepare the applicable specific RAP and/or LRP.

The following requirements define the minimum activities and information that should be covered when designing and implementing a Census and Socio-Economic Survey for projects involving physical and/or economic displacement.

- **Preparatory Requirements**

Define the survey area and affected population; review project design and relevant Bahamian land/tenure requirements; define methodology, schedule and limitations; prepare household census, socioeconomic, asset-inventory and vulnerability tools; establish data-management and confidentiality protocols; train enumerators on ethics, informed consent, gender-sensitive engagement and vulnerable groups.

- **Census Coverage and PAP Identification**

Undertake a census of all households, individuals, businesses and other economic or community units residing in or using the affected area. Assign unique IDs and record household composition, age, sex/gender, disability and other relevant vulnerability characteristics; tenure/occupancy status; length of residence/use; absentee owners where relevant; and

whether the PAP may experience physical displacement, economic displacement, or both, including whether impacts are full/partial and temporary/permanent.

- **Socio-Economic Baseline**

Collect information on income sources and levels, employment and self-employment, household expenditures, housing and living conditions, access to water, sanitation, electricity, education, health and transport, social support networks, land/resource use, and business activities/revenue. Data shall be sufficient to establish pre-displacement conditions against which restoration or improvement of livelihoods and living standards can be monitored.

- **Land Tenure, Occupancy and Residency**

Record ownership, lease/rental, recognizable claims, informal occupation/use and available documentation. Identify persons without recognizable legal rights or claims separately from persons whose claims may be recognized or recognizable under Bahamian law. Record length and basis of occupation/use and any pending title or land-interest process.

- **Asset Inventory and Valuation Support**

Identify and geo-reference affected land parcels, residential/commercial/ancillary structures, improvements, crops/trees, business assets and community assets; record ownership/use rights and condition; and collect the information needed for valuation at replacement cost. Valuation itself may be undertaken separately by qualified professionals.

- **Livelihood and Economic Displacement Assessment**

Identify wage-based, enterprise-based, home-based, informal, rental-income and land/resource-based livelihoods; determine dependence on the current location, customers, suppliers, access routes and services; estimate temporary/permanent income impacts; identify workers and dependents; and document measures needed to restore or improve income-earning capacity and standards of living.

- **Vulnerability Assessment**

Identify context-specific vulnerability, including low-income households, female-headed households, older persons, persons with disabilities or health conditions, persons with insecure tenure, households at risk of livelihood disruption and other groups facing barriers to participation or restoration. Record the nature/severity of vulnerability, displacement-related risks and targeted assistance required. Vulnerability should not be determined solely through a rigid score; professional social assessment and consultation should inform final classification.

- **Displacement Impact Classification**

For each PAP or economic unit, classify the impact as physical displacement, economic displacement, or both; identify the affected asset/livelihood/access; determine severity (full/partial) and duration (temporary/permanent); and identify host-community implications where relocation is proposed.

- **Resettlement Preferences and Assistance Needs**

Document PAP preferences and feasible options for replacement housing, relocation location, compensation in cash or in kind, livelihood restoration, transitional assistance, accessibility needs and social support. Women and other potentially disadvantaged groups shall have meaningful opportunities to express preferences.

- **Cut-Off Date and Eligibility Support**

Use the census to support establishment and disclosure of the cut-off date and to create the verified PAP register. Record persons present before the cut-off date and information needed to determine ESPS 5 eligibility and entitlements. Procedures should address absentee households and potential under-coverage.

- **Stakeholder Engagement and GRM**

Explain the purpose of the census, rights and entitlements, confidentiality and data use; obtain informed consent; provide information on the project GRM; record concerns raised during fieldwork; and ensure accessible communication for vulnerable persons. The community/project GRM may be used where adapted for ESPS 5 matters.

- **Data Management, Confidentiality and Quality Assurance**

Protect personal information in accordance with applicable Bahamian requirements and good practice; restrict access to identifiable data; anonymize public reporting; prohibit use of census information for unrelated enforcement purposes; conduct field supervision, spot checks, back-checks and consistency checks; document census completeness, absentee households and hidden or hard-to-reach populations/groups.

The following table complements the requirements presented above by summarizing the key information to be collected and explaining how each information area supports eligibility, compensation, resettlement, livelihood restoration, monitoring, and other requirements under IDB ESPS 5 and ESPS 10.

Table 15-1> Structural Summary of Minimum Content for the Census and Socio-Economic Survey

Information Area	Minimum Information Required	Purpose under IDB ESPS 5 / ESPS 10
Who is affected?	PAP identification; household composition; businesses and economic units; demographic characteristics; occupancy/use; unique PAP identification.	Establish the affected population, support the cut-off date, and determine who must be considered in resettlement planning.
What rights or claims do they have?	Ownership, tenancy, rental, recognizable claims, informal occupation/use, available documentation, duration and basis of occupation.	Determine the applicable ESPS 5 eligibility category and distinguish compensation for land from compensation for non-land assets and resettlement assistance.
What will the Project affect?	Housing, land, structures, assets, businesses, employment, income, access, services, and natural resources.	Identify the nature and magnitude of physical and/or economic displacement.
How significant is the impact?	Full/partial impact; temporary/permanent impact; relocation requirement; duration of income or access loss.	Determine the scale of mitigation and the need for a RAP, LRP, or combined instrument.

Information Area	Minimum Information Required	Purpose under IDB ESPS 5 / ESPS 10
What is the pre-displacement situation?	Housing and living conditions; income; expenditure; employment; services; education; health; transport; social networks.	Establish the socioeconomic baseline against which restoration or improvement of livelihoods and living standards will be measured.
How are livelihoods affected?	Income sources; formal/informal employment; businesses; home-based activities; rental income; location dependence; customers, suppliers, and workers.	Identify economic displacement and design livelihood restoration and transitional support measures.
Who may require differentiated assistance?	Low income; disability; age; gender-related factors; insecure tenure; health conditions; literacy/access barriers; livelihood dependency and other context-specific vulnerability.	Identify disproportionate impacts and define differentiated assistance for poor or vulnerable PAPs.
What assets must be valued?	Land, housing, structures, improvements, business/productive assets, crops/trees, and community assets.	Establish the asset inventory and information required to determine compensation at replacement cost.
What does the PAP prefer or need?	Replacement housing/location preferences; cash/in-kind options; livelihood restoration; relocation and transitional support; accessibility and social-support needs.	Inform feasible resettlement and livelihood restoration options through meaningful consultation.
How will eligibility be established?	Verified presence/use; census date; PAP register; absentee households; potential under-coverage.	Support establishment and disclosure of the cut-off date and transparent determination of eligibility and entitlements.
How will PAPs participate and raise concerns?	Information disclosure; meaningful consultation; communication needs; informed consent; GRM access; concerns and grievances.	Meet ESPS 5 and ESPS 10 requirements for meaningful engagement, disclosure, and accessible grievance management.
How will information be protected and verified?	Confidentiality; data security; anonymization; consent; quality control; back-checks; completeness verification.	Protect PAPs and ensure eligibility, compensation, and RAP/LRP decisions are based on reliable information.

Note: The table is an executive cross-reference tool, not a second set of survey modules. The detailed A–L requirements define what the census and socio-economic survey should cover; this table shows what information those requirements should produce and how that information will be used under ESPS 5 and ESPS 10.

The information collected during the Census and Economic Survey should be sufficient to establish a reliable baseline that will enable the preparation of an entitlement matrix, compensation and assistance measures, livelihood restoration measures, resettlement options, support for vulnerable persons, implementation budgets, establish monitoring indicators, and completion verification in accordance with IDB ESPS 5.

Annex K

Biodiversity Screening and Management Guidance

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

1 INTRODUCTION AND SCOPE

1.1 INTRODUCTION

This Biodiversity Screening and Management Guidance Framework (BSMGF) establishes the minimum requirements for preparing project-specific Biodiversity Management Plans (BMP) and Biodiversity Action Plans (BAP) under the BH-L1064 Program (the Program), as well as guidelines for conducting a Critical Habitat Assessment (CHA).

1.2 SCOPE

The Framework is intended to support implementation of the IDB Environmental and Social Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources and applies to all future projects screened under the Environmental and Social Management Framework (ESMF).

As this document focusses on CHA/BMP/BAP development, prior requisites such as biodiversity screening, baseline studies, impact assessment and habitat classification are assumed to have already been completed during the Environmental and Social Assessment (ESA) process. If the biodiversity screening identified potential critical habitat, the CHA (described in Chapter 3) called for in the evaluation process should be undertaken before any other elements described here, because BH-L1064 projects will not be implemented in areas confirmed as critical habitat by a CHA. Projects found to be located inside legally protected areas by biodiversity screening are also excluded from BH-L1064 financing.

2 TARGET DOCUMENTS

Where the biodiversity screening indicates that one or more of the IDB ESPS 6 Critical Habitat criteria may be triggered, a formal CHA should be completed before the preparation of a BMP and/or BAP. A CHA is usually led by an experienced biodiversity specialist, often requiring the participation of species or ecosystem experts where publicly available information is not enough for each species or ecosystem evaluated to be clearly identified as a critical habitat triggering element or not.

A BMP is an implementation-focused document usually directed at contractors that defines their responsibilities in biodiversity management. A BMP will always be incorporated into the project ESMP as a chapter or stand-alone appendix document. A BMP is typically a static operational document that provides practical guidance for applying, monitoring, and reporting on avoidance, minimization, and restoration measures that contractors are required to undertake. BMPs generally only require updating when there are significant project changes and/or new mitigation requirements. In many simple projects, a BMP alone is sufficient to manage biodiversity impacts where significant residual impacts requiring compensation measures are not anticipated and any potential non-significant negative biodiversity impacts have simple, known and widely applied management measures.

A BAP is more of a strategic document for project developers that summarizes relevant findings, establishes biodiversity objectives, assigns responsibilities, develops monitoring programs and provides adaptive management procedures. A BAP can be incorporated into the project ESMP as a chapter or stand-alone appendix document. In contrast to a BMP, a BAP should be treated as a living management document that is periodically updated throughout the project lifecycle as objectives are completed and new information during implementation and monitoring becomes available, therefore it is usually a stand-alone document to facilitate constant updating. It should demonstrate how the full mitigation hierarchy –avoidance, minimization, restoration and compensation– is being applied to address project biodiversity impacts and manage residual biodiversity risks. In contrast to a BMP, a BAP will usually focus on and describe in detail the justification and implementation of strategic programs not relevant to construction contractor responsibilities, often to be undertaken by specialized biodiversity contractors or the MOHLR itself. Such strategic objectives usually include the project's No Net Loss objectives for biodiversity offsets.

The separation of biodiversity management into the static BMP for construction contractor responsibilities and the dynamic BAP for evolving issues handled by biodiversity contractors is usually a contractual advantage. However, for a small percentage of cases in very small projects still requiring a BAP, it may be convenient for the contents of a BMP to be incorporated into a single, integrated BAP.

Both the BMP and BAP may require a separate Biodiversity Monitoring and Evaluation Plan (BMEP) to lay out the details of monitoring programs, data analysis protocols, interpretation guidelines and Key Performance Indicators (KPIs). This information is often incorporated into the BMPs/BAPs, but the development of a separate BMEP document will usually be preferable in situations where:

- The complexity of monitoring is high (many biological groups with multiple methodologies) with potential for evolving methodologies;
- The scale of the required monitoring and evaluation far exceeds the project direct influence area;
- A diversity of different and specialized contractors is required; and/or
- The BMEP implementation is mostly outside the project construction timeline (where the BMP may no longer be relevant).

3 OBJECTIVES

The objective of this BSMGF is to ensure that biodiversity risks and impacts are identified, assessed, avoided, minimized, restored, and, where necessary, offset in accordance with the mitigation hierarchy. It provides a standardized methodology for biodiversity screening, habitat classification, impact assessment, mitigation planning, monitoring, and adaptive management for future subprojects financed under the Program. This approach ensures consistency across all housing, urban development, rehabilitation, and associated infrastructure investments financed under the Global of Multiple Works (GOM) modality.

The BSMGF should be used to (i) undertake a project specific CHA if potential critical habitat was identified in the biodiversity screening (ii) develop a project specific BMP whenever biodiversity-specific mitigation measures are required for contractors to reduce non-significant or significant impacts to biodiversity values, as well as (iii) develop a project specific BAP whenever biodiversity screening identifies that a project may trigger any of the following:

- Significant impacts or conversion of natural habitats or modified habitats with significant ecological value;
- Significant impacts or conversion of areas supporting priority ecosystem services, containing threatened species or species of conservation concern and/or within ecologically sensitive coastal, wetland, terrestrial, freshwater or marine environments; or
- Location within internationally recognized areas that are not protected.

4 INFORMATION REQUIREMENTS

While a BMP should be acutely focused on mitigation measure implementation and monitoring, a BAP should summarize key findings from the ESA including habitat classifications, sensitive receptors, threatened species, ecosystem services, critical habitat conclusions, and assessed impact pathways. The BAP should avoid duplication of technical baseline chapters and instead focus on translating assessment findings into management actions. Any material changes in project design or new biodiversity information should trigger targeted updates.

The following sections summarize the specific information requirements that should have been undertaken prior to triggering and developing a BMP and/or BAP. Should there be gaps in the required information presented below, the BAP should also serve as a place to present any supplementary or updated information if appropriate.

4.1 INITIAL BIODIVERSITY SCREENING

All projects should undergo biodiversity screening during the drafting of the project's ESA. A desktop biodiversity screening should review at a minimum:

- Protected area databases;
- National biodiversity inventories;
- International Union for the Conservation of Nature (IUCN) Red List data;
- Key Biodiversity Areas (KBA);
- Government conservation plans;
- Existing scientific literature;
- Previous environmental studies.

Habitat Screening should be undertaken to identify and map modified, natural and critical habitat (according to ESPS 6 definitions), ecologically sensitive areas, habitat connectivity corridors and ecosystem service areas.

Species Screening should be undertaken to identify threatened, endemic, restricted-range and migratory species, as well as species of national conservation concern. Species Screening is a subset of the critical habitat screening described in the CHA Methodology chapter below.

Screening Outcomes should determine whether impacts on biodiversity are likely, whether seasonal surveys are required, whether a project-specific BAP and/or BMP is required and whether there is a potential to trigger critical habitat criteria requiring a CHA (see section 3, CHA Methodology, below).

4.2 BIODIVERSITY BASELINE REQUIREMENTS

Where the ESA recommends a BAP, the biodiversity baseline developed for the ESA should be reviewed and, where necessary, supplemented or replaced with a new study to ensure that the minimum requirements outlined below are met.

The baseline should be proportionate to project risk and include primary and secondary information.

- **Area of Influence** should be assessed to the scale of Direct Area of Influence (DAI), Indirect Area of Influence (IAI) and Cumulative Area of Influence (where applicable).

- **Field Surveys** should account for ecological seasonality and may require surveys during different periods of the year where biodiversity values vary substantially. Survey design should address flora, birds, mammals, reptiles, amphibians, freshwater/marine biota and invasive species.

- **Habitat Mapping** should include GIS-compatible habitat mapping identifying habitat extent and condition, fragmentation, connectivity and any sensitive receptors.

- **Ecosystem Services** potentially affected by the project should be identified, including but not limited to coastal protection, flood regulation, water supply, groundwater recharge, recreation, cultural values, fisheries, pollination and supporting services.

4.3 BIODIVERSITY IMPACT ASSESSMENT

Where the ESA recommends a BAP and/or BMP, the biodiversity impact assessment developed for the ESA should be reviewed and, where necessary, supplemented or replaced with a new assessment to ensure that the minimum requirements outlined below are met.

The BAP and/or BMP should summarize the pertinent direct, indirect, induced, and cumulative biodiversity impacts identified. Impact assessment should consider the following impacts typical of housing construction phases:

- **Construction Phase** impacts will generally include vegetation clearance, habitat loss, habitat fragmentation, disturbance from noise/vibration/lighting, soil disturbance, pollution risks, increased access and human activity and wildlife mortality among others.

- **Operational Phase** impacts will generally include long-term habitat conversion, barrier effects, invasive species introduction, human-wildlife interactions, stormwater impacts, altered hydrology and increased vehicle traffic among others.

- **Cumulative Impacts** will generally include the combined effects of existing developments, reasonably foreseeable future developments, regional habitat loss trends, and other infrastructure projects among others.

5 CRITICAL HABITAT ASSESSMENT METHODOLOGY

The CHA should principally determine whether critical habitat is present within the project's direct, indirect, or cumulative Area of Influence, in which case the project would not be compatible with the BH-L1064 Program investment criteria (see Annex A).

A CHA must be completed and reviewed by qualified biodiversity specialists. The assessment should generally proceed with the following workflow:

1. Identify biodiversity features (see below) potentially qualifying under IDB ESPS 6 critical habitat criteria, reviewing the IUCN Red List, the Global Biodiversity Information Facility (GBIF), legally protected areas, Key Biodiversity Areas (KBA), Ramsar Sites, Important Bird Areas (IBA) and national datasets;
2. Identify ecological processes supporting biodiversity values;
3. Evaluate each species and/or ecosystem by each relevant IDB ESPS 6 critical habitat criterion;
4. Undertake targeted field verification if required;
5. Document conclusions in a specialist report reviewed by qualified biodiversity experts.

The CHA should evaluate, as applicable, the following biodiversity features potentially qualifying under IDB ESPS 6 critical habitat criteria:

- Habitat supporting Critically Endangered (CR), Endangered (EN) or Vulnerable (VU) species;
- Habitat supporting endemic or restricted-range species;
- Habitat supporting migratory or congregatory species;
- Highly threatened or unique ecosystems;
- Ecological processes necessary for maintaining critical biodiversity features; &
- Legally protected and internationally recognized conservation areas including KBAs, Ramsar Sites, IBAs, Alliance for Zero Extinction (AZE) sites, natural or mixed World Heritage Sites and equivalent conservation designations.

A CHA for the BH-L1064 Program might include some or all of the following chapters:

- **Executive Summary**: Summarizes the project, assessment approach, critical habitat findings, BH-L1064 Program compliance implications, and any key project changes required for project implementation.
- **Introduction and Objectives**: Defines the purpose, scope, and objectives of the CHA and its role in demonstrating compliance with IDB ESPS 6 biodiversity requirements.
- **Applicable Standards and Regulatory Framework**: Describes the requirements of IDB ESPS 6 (in the context of the BH-L1064 Program), applicable national biodiversity legislation, and any other international biodiversity commitments relevant to the project.
- **Project Description**: Provides an overview of project activities, footprint, associated facilities, construction and operational components, and potential pathways for biodiversity impacts.

- **Area of Influence and Assessment Boundaries**: Defines the spatial and ecological boundaries of the assessment, including areas potentially affected by direct, indirect, induced, and cumulative impacts.

- **Methodology**: Describes the assessment process, including literature review, biodiversity databases, stakeholder consultation, field surveys, habitat mapping, and application of critical habitat criteria and thresholds.

- **Biodiversity Baseline Conditions**: Characterizes the existing biodiversity values within the Area of Influence, including habitats, ecosystems, species of conservation concern, ecological processes, protected areas, and KBAs.

- **Habitat Classification**: Modified habitat, natural habitat, and critical habitat screening: Classifies habitats within the Area of Influence according to ESPS 6 habitat definitions and identifies biodiversity features requiring detailed critical habitat evaluation.

- **Screening of Potential Critical Habitat Features**: Identifies species, ecosystems, and biodiversity features that may qualify as critical habitat and determines which warrant detailed assessment against ESPS 6 criteria.

- **Critical Habitat Assessment**: Evaluates each candidate feature against the ESPS 6 critical habitat criteria, including threatened species, endemic or restricted-range species, migratory or congregatory species, threatened ecosystems, and key evolutionary processes.

- **Critical Habitat Trigger Analysis and Justification**: Documents the quantitative and qualitative evidence used to determine critical habitat status, including threshold analyses, species population estimates, habitat extent calculations, and supporting scientific rationale.

- **Critical Habitat Delineation and Mapping**: Defines and maps the spatial boundaries of confirmed critical habitat features within the Area of Influence and their relationship to project components.

- **Assessment of Project Risks and Impacts on Critical Habitat**: Evaluates the project's direct, indirect, induced, and cumulative impacts on critical habitat values, ecological integrity, and conservation outcomes.

- **Conclusions and Recommendations**: Summarizes critical habitat determinations, key compliance conclusions, residual risks, and recommended actions required to maintain ESPS 6 compliance.

- **Appendices**: Provides supporting technical documentation including species screening tables, habitat maps, GIS outputs, survey methodologies, threshold calculations, consultation records, and detailed analytical results.

The outcome of the CHA should determine whether the project is suitable for the BH-L1064 Program financing. No project-specific BMP and/or BAP should be finalized until the CHA clearly demonstrates that the project is not located in critical habitat. The location of a project within critical habitat will require project redesign in order to be suitable.

6 APPLICATION OF THE MITIGATION HIERARCHY

In many projects, a BMP alone might be sufficient to manage biodiversity impacts where significant residual impacts are not anticipated. A BAP will be more commonly required when the project results in residual impacts to biodiversity features, when biodiversity offsets or other compensation measures are needed, and/or when threatened and priority biodiversity features have been identified within the project's area of influence and additional management actions are necessary to demonstrate compliance with ESPS 6.

The objectives of a BMP and/or BAP should include preventing avoidable habitat loss, demonstrating compliance with all relevant requirements of ESPS 6, maintaining ecological integrity and ecosystem functions, protecting threatened and priority biodiversity features, safeguarding ecosystem services that support affected communities and biodiversity values, achieving No Net Loss outcomes where required, managing residual impacts through appropriate compensation measures, and ensuring that biodiversity considerations are fully integrated into project design, procurement, construction, operation, and, where applicable, decommissioning.

Priority should be given to the **Avoidance** of impacts through strategies such as alternative site selection, reduced project footprint, retention of natural habitat, protection of sensitive ecological features, seasonal restrictions and conservation buffers among others.

Where impacts cannot be avoided, **Minimization** of impacts should be achieved by measures such as reduced vegetation clearing, lighting controls, noise controls, erosion prevention, access management and construction timing restrictions among others.

Post-construction **Restoration** of impacts areas might be possible through strategies such as native vegetation planting, habitat rehabilitation, wetland restoration, invasive species control & soil stabilization among others.

Offsets and Compensatory measures for residual impacts should only be considered after avoidance, minimization, and restoration measures have been fully evaluated, and should comply with ESPS 6 requirements to achieve No Net Loss for affected natural habitat.

6.1 AVOIDANCE & MINIMIZATION MEASURES

For public housing and apartment developments, avoidance measures should have highest priority. Candidate sites should preferentially be located in previously disturbed urban land. Project layouts should avoid wetlands, coastal vegetation, native forest remnants, mature trees, species breeding areas and drainage features. Building footprints should be consolidated to minimize habitat fragmentation. Utility corridors should follow existing roads where feasible. Construction compounds, borrow areas, stockpiles and worker facilities should be situated in disturbed areas. Design teams should retain native vegetation patches and maintain ecological connectivity wherever practical.

Where impacts cannot be eliminated, measures should reduce magnitude and duration. These include restricting clearing limits through surveyed boundaries, erecting exclusion fencing, maintaining buffers around sensitive habitats, controlling dust, noise and lighting, reducing vehicle speeds, preventing off-road driving, implementing erosion and sediment controls, controlling stormwater runoff, avoiding unnecessary night works, and applying invasive-species prevention protocols. Temporary disturbances should be restored immediately upon completion of activities.

For projects implemented under the Program, avoidance and minimization measures should be tailored to the scale and type of housing activity. Single-family affordable housing should prioritize use of previously disturbed lots, retention of native vegetation within parcels, avoidance of wetlands and natural drainage features, and strict limitation of vegetation

clearance to the building footprint. Multi-unit apartment blocks should use compact layouts and urban densification to reduce land take, avoid remnant habitat patches, integrate native vegetation into communal open space, and incorporate nature-based stormwater controls. Supporting infrastructure, including roads, drainage and utilities, should be routed along existing disturbed corridors wherever feasible, avoid fragmentation of pine forest, coppice, mangroves and wetlands, maintain hydrological connectivity through appropriately designed culverts or crossings, and implement erosion, sediment, spill and invasive-species controls during construction.

As part of the avoidance-minimization strategy in a BMP, contractors should implement biodiversity awareness training, vegetation clearing procedures, wildlife encounter protocols, invasive species management and environmental incident reporting procedures.

All these measures should be reflected in contractor method statements, site plans, drainage designs, revegetation plans and monitoring checklists, and should be verified through construction-phase biodiversity supervision. Below are project specific measures that should be considered for the BMP and/or BAP of each project where impacts to biodiversity values have been identified.

6.1.1 Single-Family Housing Developments

These measures apply to all developments and are inclusive for small clusters of individual houses, such as the single-family housing lots described for New Providence, Grand Bahama and Abaco.

6.1.1.1 Avoidance Measures

Prioritize already-cleared or degraded lots over intact native habitat. Single-family housing should be preferentially located on previously disturbed, cleared, filled, derelict or urbanized parcels rather than on intact pine forest, coppice, wetland, mangrove, or coastal vegetation. This is particularly important in Grand Bahama and Abaco, where pine forest and coppice habitats can support endemic or restricted Bahamian wildlife and have been affected by hurricane damage and development pressure.

Avoid siting houses in wetlands, swales, tidal creeks, mangrove margins or natural drainage depressions. No housing footprint, septic system, access track, storage area, or construction compound should be placed in mangrove swamp, marsh, freshwater wetland, tidal creek, seasonal ponding area, or natural drainage feature unless there is no feasible alternative and the impact has been assessed under ESPS 6. Wetlands and mangroves in The Bahamas provide flood attenuation, shoreline stabilization, fisheries nursery habitat, and climate resilience functions.

Retain mature native trees and native vegetation patches within individual lots wherever feasible. Lot layout should be adjusted to retain native vegetation, especially mature Caribbean pine, native coppice trees, palms, and shrubs that provide shade, bird habitat, soil stability and local ecological connectivity. Where feasible, clearing should be limited to the building pad, access path, utility corridor and minimum safety clearance, rather than the full parcel by default.

Avoid fragmenting small remnant habitat patches. Where remnant coppice, pine or wetland edge vegetation exists within or adjacent to the housing site, individual house footprints should be clustered or shifted to retain contiguous habitat rather than creating isolated, unusable fragments. This is especially relevant where small lots adjoin undeveloped land, protected areas, known ecological corridors, or wetland margins.

Avoid removal of vegetation during sensitive breeding periods where relevant species are identified. If the ESA or pre-construction inspection identifies nesting birds, roosting bats, reptiles, or other sensitive fauna, vegetation clearance should be delayed or phased to avoid

active nests, breeding sites, burrows or roosts. This measure should be applied particularly in coppice and pine forest areas that may support resident and migratory birds.

Avoid introducing ornamental invasive species in landscaping. Landscaping plans for affordable housing should avoid invasive or potentially invasive ornamental species and should instead use hardy native Bahamian plants suited to low-maintenance urban conditions. This reduces long-term management cost and avoids spreading invasive species into nearby coppice, pine forest, wetland or coastal habitats.

6.1.1.2 Minimization Measures

Demarcate the approved clearing footprint before construction begins. The contractor should physically mark the construction footprint and no-go zones before vegetation clearance. Any vegetation outside the approved boundary should be treated as a biodiversity exclusion zone.

Flush out fauna prior to clearing. Prior to clearing natural vegetation (the day before), a team should walk through the site to look for bird nests and other similar features, as well as overturn rocks etc., to locate any wildlife that might be injured or killed during vegetation clearing and displace them from the site into adjacent vegetation. The finding of active threatened species nests should result in the suspension of clearing activities until the nest is naturally abandoned, which should be specified in site-specific nest and burrow protection measures.

Use small-scale, low-impact clearing methods. Clearing should be undertaken using hand-operated tools or small machinery where feasible, especially in constrained lots near retained vegetation. Bulldozing entire lots should be avoided unless technically justified.

Strip and store topsoil separately for reuse. Where soils are suitable, topsoil from cleared areas should be stripped, stored separately from subsoil, protected from erosion, and reused for site stabilization and native revegetation. This is particularly useful in sandy or thin-soil Bahamian settings where natural recovery may be slow.

Control sediment and runoff from small house lots. Basic low-cost erosion controls such as silt fences, straw wattles, berms, gravel check dams, sediment traps and staged clearing should be used to prevent sediment from entering wetlands, drainage ditches, swales, mangroves or nearshore waters.

Use wildlife-friendly site practices. Open trenches, pits and excavations should be inspected daily and provided with escape ramps where feasible. Workers should be instructed not to capture, harm, feed or disturb wildlife. Any fauna encountered during clearing should be allowed to move away or should be handled by an approved specialist where necessary.

Minimize night lighting and light spill. Construction lighting should be temporary, downward-directed and limited to working areas. Permanent lighting should use shielded fixtures and warm-color lamps where feasible to reduce disturbance to birds, bats and other fauna.

Stabilize disturbed areas rapidly after construction. Exposed soil should be stabilized quickly using mulch, gravel, native groundcover or other low-cost measures. Native planting should be prioritized over ornamental lawns where water supply or maintenance capacity is limited.

Develop a fauna rescue protocol. The protocol should provide contractors with the means to deal with any event of fauna injury during the construction phase. The guidelines should include the contact details of an approved wildlife veterinarian or organization who has agreed to receive any injured fauna related to the project.

6.1.2 Multi-Unit Apartment Blocks

These additional measures apply specifically to denser housing blocks, such as the proposed multi-unit housing within the program and similar future urban infill or densification investments.

6.1.2.1 Avoidance Measures

Use densification to avoid expansion into undeveloped habitat. Multi-unit apartment blocks should be sited within existing urban, peri-urban or already disturbed housing estates wherever possible. The biodiversity advantage of apartment blocks is that they can accommodate more households on a smaller footprint, reducing pressure to convert pine forest, coppice, wetlands or coastal vegetation elsewhere.

Avoid locating apartment blocks on remaining Natural Habitat islands within urban areas. Even in urban or peri-urban settings, remnant coppice patches, mature tree stands, drainage swales and wetland pockets may provide habitat steppingstones, shade, stormwater regulation and community ecosystem services. Where such features exist, apartment footprints and parking areas should be designed around them rather than replacing them.

Avoid filling low-lying flood-prone or wetland-influenced parcels. Low-lying areas that naturally retain water should not be used for apartment blocks unless hydrological and ecological impacts have been assessed. Filling these areas can increase flood risk elsewhere, reduce stormwater retention, and affect wetland functions. Wetlands and mangroves are recognized as important ecosystems across the islands of The Bahamas.

Avoid creating impermeable layouts that sever natural drainage. Site design should preserve natural water flow paths where feasible. Buildings, parking lots and perimeter walls should not block surface drainage to wetlands, swales or mangrove systems unless drainage replacement measures have been designed.

Avoid excessive parking footprints. Parking should be right-sized and designed efficiently to reduce land take. Permeable paving, shared parking, compact layouts and retention of planted areas should be considered where feasible.

6.1.2.2 Minimization Measures

Concentrate the construction footprint and use vertical design efficiency. Apartment blocks should use compact layouts that reduce the total cleared area per household. Where feasible, the design should consolidate building, parking, waste storage and utilities within a defined envelope to avoid scattered disturbance.

Integrate retained vegetation into site design. Mature native trees and vegetation patches should be incorporated into communal open space, shaded walkways, setback areas or stormwater features. Retained vegetation should be fenced before construction and protected from root compaction, storage, trenching and equipment damage.

Use nature-based stormwater management where feasible. Apartment blocks should incorporate low-cost nature-based drainage features such as vegetated swales, rain gardens, infiltration basins, retention ponds, planted setbacks and permeable surfaces. These measures can reduce runoff, protect downstream wetlands and lower flood risk.

Control construction noise, dust and lighting near retained habitats. Dust suppression, working-hour controls, localized acoustic barriers, shielded lighting and equipment maintenance should be used where works are adjacent to coppice, pine forest remnants, wetlands, mangroves or residential green spaces.

Minimize excavation impacts. Excavation for foundations, underground utilities, drainage and septic systems should be limited to approved areas. Excavated material should not be dumped into vegetated areas, swales, mangroves, wetlands or informal open spaces.

Manage waste to avoid attracting nuisance wildlife and invasive species. Construction and domestic waste areas should be enclosed, regularly removed, and protected from wind dispersal. Food waste should not be left exposed because it can attract rats, dogs, cats, birds and other nuisance species that may affect native fauna.

Use native, drought-tolerant landscaping. Landscaping should use native Bahamian species suited to the island, soil and exposure conditions. Native landscaping improves habitat value, reduces irrigation demand, and minimizes the risk of invasive plant spread.

6.1.3 Supporting Infrastructure: Roads, Drainage and Utilities

These additional measures apply specifically to subdivision roads, local access roads, drainage channels, culverts, stormwater infrastructure, water supply, sewerage, power lines, communications, and utility trenches associated with housing developments. Roads, drainage and utilities are supporting infrastructure for certain housing works.

6.1.3.1 Avoidance Measures

Route roads and utilities along existing disturbed corridors wherever possible. New access roads, service tracks, drainage lines and utility corridors should follow existing roads, tracks, property boundaries or disturbed land to avoid new fragmentation of pine forest, coppice, wetlands or mangroves.

Avoid road alignments that cut across wetlands, mangrove systems or tidal creeks. Roads and utility corridors should not bisect mangrove creeks, wetland basins, tidal channels or seasonally inundated areas unless there is no feasible alternative. Causeways and poorly designed crossings can restrict water flow and degrade mangrove creeks.

Avoid unnecessary widening of access roads. Road widths should be minimized consistent with safety, emergency access and engineering requirements. Oversized roads increase habitat loss, stormwater runoff, heat-island effects and maintenance costs.

Avoid locating untreated drainage outfalls directly into sensitive receiving habitats. Stormwater should not discharge untreated sediment, oils, concrete washout, sewage, waste or high-volume runoff directly into wetlands, mangroves, tidal creeks, ponds or nearshore marine environments.

Avoid utility corridors through intact habitat when alternative alignments are available. Water, power, communications and sewer infrastructure should be co-located in shared trenches or existing corridors to reduce repeated disturbance and cumulative habitat fragmentation.

6.1.3.2 Minimization Measures

Use narrow, clearly demarcated construction corridors. For roads, drainage works and utilities, contractors should define the maximum working width and prohibit clearing, parking, stockpiling or equipment movement outside the approved corridor.

Install culverts and crossings that maintain hydrological connectivity. Where roads or utilities must cross drainage pathways, swales, wetlands or tidal-influenced areas, culverts or bridge structures should be sized and placed to maintain natural flow, prevent upstream ponding, avoid downstream drying, and allow movement of aquatic and semi-aquatic fauna where relevant.

Use erosion and sediment control before earthworks begin. Silt fencing, sediment basins, check dams, geotextiles, staged clearing, rock aprons and temporary diversion drains should be installed before road grading, trenching or drainage excavation. This is especially important on sandy soils and near wetlands, mangroves or coastal waters.

Design drainage to mimic natural flow rather than simply accelerating runoff. Drainage designs should prioritize infiltration, detention and vegetated conveyance rather than rapid discharge. Swales, retention basins, infiltration trenches and vegetated buffers can reduce sediment loads and protect downstream wetlands and mangroves.

Prevent concrete washout, fuel and chemical contamination. Designated washout areas, spill kits, secondary containment and refueling controls should be required. No washing of concrete trucks, tools or equipment should occur near drains, wetlands, mangroves, swales or unprotected soils.

Restore temporary access tracks and utility trenches. Temporary roads, laydown areas and utility trenches should be backfilled, stabilized and revegetated using native species or appropriate substrate as soon as works are complete.

Manage roadside vegetation with biodiversity sensitivity. Permanent road verges should retain native vegetation where safe, avoid invasive ornamental planting, and be managed through selective trimming rather than complete clearance.

Control invasive species along disturbed corridors. Roads and utilities often create corridors for invasive species spread. Construction equipment should arrive clean, fill material should be weed-free where practicable, and post-construction monitoring should include invasive plant checks along road edges, drainage channels and utility corridors.

Use wildlife-sensitive traffic controls. In areas adjacent to Natural Habitat, speed limits, signage and worker awareness should be used to reduce wildlife mortality. Where repeated wildlife crossings are recorded, additional control measures such as traffic calming or small fauna passages should be considered.

6.2 RESTORATION AND REHABILITATION

All temporarily disturbed areas should be restored using native species consistent with local ecological conditions. Restoration plans should include soil stabilization, invasive species management, revegetation standards, maintenance obligations, performance criteria and monitoring requirements. Success should be evaluated against measurable ecological indicators. Project specific restoration plans should follow best practices such as the restoration recommendations in the Fire Management Assessment of Caribbean Pine Forest Ecosystems on Andros and Abaco[1] among other similar studies. Below are some general principles that restoration plans should generally follow:

- **Use Only Local Bahamas Pine Genetic Stock** (Plant: *Pinus caribaea* var. *bahamensis*). Seed should ideally originate from the same island or ecological region being restored to maintain local adaptation and genetic integrity.

- **Restore Natural Fire Regimes.** Bahamian pine forests are described as fire-climax communities. Without periodic fire, broadleaf coppice expands, pine recruitment declines and long-term conversion to hardwood forest can occur. A prescribed fire program is therefore often a critical restoration measure.

- **Control Broadleaf Encroachment.** Site preparation may be required where dense shrub layers exist and where coppice species dominate. The goal should be reducing competition while retaining native biodiversity.

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[1] Myers, R., D. Wade, and C. Bergh, Fire Management Assessment of the Caribbean Pine (Pinus caribea) Forest Ecosystems on Andros and Abaco Islands, Bahamas. GFI publication no. 2004-1. The Nature Conservancy, Arlington, VA.

- **Prioritize Natural Regeneration.** Natural regeneration should generally be assessed before planting because Caribbean pine often regenerates effectively from seed when seed trees remain present, when the fire regime is suitable and the hydrology remains intact. Planting should be used primarily where regeneration failure is evident.

- **Maintain Hydrological Conditions.** Many Bahamian pine forests occur on low-relief limestone landscapes with shallow freshwater lenses. Restoration should, where possible, avoid altered drainage, excessive filling, persistent flooding and saltwater intrusion. Hydrological degradation can prevent successful pine establishment.

- **Restore Native Understory Communities.** Successful restoration should aim for the entire ecosystem, not just pine trees. Target components should include native grasses, palmetto, native shrubs, ground orchids and pine-specialist wildlife habitat. This is particularly important where restoration is intended to support species such as Bahama Warbler and Bahama Parrot.

- **Consider Hurricane Resilience.** In the Bahamas, hurricanes are natural ecosystem drivers. Restoration designs should promote structural diversity, avoid monoculture plantations, maintain landscape connectivity and encourage natural regeneration patterns.

6.3 NO NET LOSS STRATEGIES

The BAP should establish measurable biodiversity outcomes. For natural habitat, the objective should be No Net Loss of biodiversity values after application of the mitigation hierarchy. Performance metrics should be quantifiable and auditable and may include habitat area, habitat condition scores, ecosystem functionality, species occupancy, abundance indicators and connectivity indices. Compensatory measures, conservation agreements, restoration programs or offsets may only be considered after avoidance, minimization and restoration opportunities have been exhausted.

Methods for achieving No Net Loss may include:

- Habitat restoration;

- Habitat enhancement;

- Long-term conservation agreements;

- Protected area support;

- Biodiversity offsets;

- Ecological corridor conservation;

- Biological and ecological studies of threatened or priority biodiversity values (when lacking); and

- Biodiversity-focused local education programs.

7 BIODIVERSITY MONITORING PROGRAM

7.1 MONITORING FRAMEWORK

A BAP should include a monitoring framework for its different objectives:

- Compliance monitoring should verify implementation of mitigation measures.
- Effects monitoring should evaluate ecological responses.
- Outcome monitoring should assess achievement of No Net Loss goals.

The monitoring framework should also apply to a BMP that contains minimization and restoration measures; a BMP containing only simple, known and widely applied avoidance measures would not usually warrant a monitoring framework.

The monitoring framework should generally include objectives, indicators, baseline values derived from the ESA, monitoring locations, methods, frequency, responsibilities, reporting requirements and corrective-action thresholds.

Monitoring frequency should be risk-based and continue throughout construction and operation as necessary. Construction monitoring should generally occur monthly while operational monitoring may continue annually until performance criteria are met.

Monitoring indicators vary depending on the monitoring goal and may include, but are not limited to:

- **Habitat Indicators -** area of habitat lost, area restored, vegetation survival, invasive species occurrence, habitat condition scores, connectivity metrics and compliance with exclusion zones.
- **Species Indicators -** species presence/absence, population abundance, breeding success, mortality incidents.
- **Ecosystem Service Indicators -** wetland function, coastal stabilization performance, water quality metrics and vegetation cover.

Adaptive management should be triggered where monitoring demonstrates that performance objectives are not being met.

7.2 ADAPTIVE MANAGEMENT PROCEDURES

Adaptive management should provide a structured process for responding to monitoring results. Where monitoring indicates performance objectives are not being achieved, the responsible environmental specialist should identify the deviation, investigate root causes, assess ecological significance, propose corrective actions, implement revised mitigation measures and monitor effectiveness.

Corrective actions might include increasing restoration effort, expanding buffer areas, revising construction controls, modifying lighting designs, increasing biodiversity supervision, or undertaking supplemental habitat enhancement measures among others. All adaptive-management decisions should be documented and incorporated into updated versions of the BMP/BAP.

8 BMP/BAP PROGRAM MANAGEMENT

BMP/BAP implementation should be documented through regular monitoring reports that include progress against biodiversity objectives, monitoring results, incidents and corrective actions, compliance status, updated risk assessment and recommendations for improvement. Where performance targets are not achieved, adaptive management measures should be developed and implemented.

Ideally, the BMP/BAP managers should integrate biodiversity requirements into general site clearing procedures, excavation activities, traffic management plans, erosion and sediment control plans and stormwater management systems.

8.1 ROLES AND RESPONSIBILITIES

The MOHLR should oversee implementation and reporting. Contractors should implement BMP mitigation measures and maintain qualified environmental personnel. Biodiversity specialists should undertake inspections, evaluate monitoring results and recommend adaptive-management actions. Independent experts may be required for BAPs where offset obligations apply.

Project-specific BMPs/BAPs should clearly define responsibilities for the different participants:

- **MOHLR**, as the Executing Agency, is generally responsible for oversight of BAP implementation, reporting to IDB and compliance verification.
- **Environmental Staff** are generally responsible for biodiversity supervision, monitoring review and adaptive management recommendations.
- **Contractors** are generally responsible for daily compliance, workforce training and incident reporting.
- **Biodiversity Specialists** are generally responsible for CHAs, baseline surveys, monitoring audits and the verification of No Net Loss outcomes.

8.2 REPORTING REQUIREMENTS

Monthly construction reports and periodic operational reports should summarize mitigation implementation, monitoring results, incidents, corrective actions, stakeholder concerns and progress toward biodiversity objectives. Significant biodiversity incidents should be reported immediately and investigated, with corrective actions to be implemented.

In terms of specific biodiversity incident reporting, when relevant, a BMP or BAP should establish procedures for reporting:

- Unauthorized vegetation clearing;
- Wildlife mortality incidents;
- Habitat damage;
- Introduction of invasive species;
- Spills affecting biodiversity receptors;
- Any other non-compliance with biodiversity commitments.

Annex L

Cultural Heritage Chance Finds Guidance Document

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

1. PURPOSE AND USE OF THIS GUIDANCE DOCUMENT

This Guidance Document provides a practical framework for identifying and managing chance finds of tangible cultural heritage that may be encountered during implementation of projects financed under the Program. It is intended to guide MOHLR, consultants, contractors, and other project personnel in applying the requirements of IDB ESPS 8 and applicable Bahamian requirements to project activities that may result in the discovery or disturbance of previously unidentified cultural heritage resources.

The need to apply this Guidance Document is determined through the Project Environmental and Social Screening Form (Annex A). Where screening identifies a potential risk that excavation, demolition, construction, or other project activities could uncover or affect previously unidentified cultural heritage resources, the relevant guidance and procedures in this document shall be incorporated into the project's Environmental and Social Assessment (ESA) and Environmental and Social Management Plan (ESMP), as appropriate. Where the nature, scale, complexity, legal requirements, or implementation arrangements warrant a standalone instrument, the guidance may be developed into a project-specific Chance Finds Procedure (CFP).

The ESA will identify known cultural heritage receptors within the project's Area of Influence and assess the potential for impacts to both known and previously unidentified resources. Where known cultural heritage resources could be affected, project-specific assessment and management measures shall be developed in consultation with the relevant cultural heritage authorities and stakeholders. Where the ESA identifies a risk of encountering previously unidentified cultural heritage during project implementation, the applicable chance-find procedures described in this Guidance Document shall be incorporated into the project's E&S management arrangements.

The project-specific procedures should be coordinated with the ESA/ESMP and, as relevant, the Stakeholder Engagement Plan (SEP), Grievance Redress Mechanism (GRM), Contractor Environmental and Social Management Plan (CESMP), and any project-specific cultural heritage assessment or management measures.

This Guidance Document therefore does not automatically constitute a separate project-level instrument. Rather, it provides guidance to support the preparation and implementation of the project-level E&S instruments identified through Annex A screening.

The following sections provide the practical guidance for developing and implementing a project-specific procedure (CFP) where required based on the results of the project's Environmental and Social Screening Form (Annex A) and the ESA. The guidance describes the types of cultural heritage resources that may be encountered, the roles and responsibilities for managing chance finds, and the procedures for identifying, documenting, evaluating, reporting, and managing such finds. Where a project-specific CFP is required, its provisions should be incorporated into the project's ESA and Environmental and Social Management Plan (ESMP) or, where warranted by the nature, scale, complexity, legal requirements, or implementation arrangements of the project, prepared as a standalone instrument. The CFP should also be coordinated with the project's Stakeholder Engagement Plan (SEP), Grievance Redress Mechanism (GRM), Contractor Environmental and Social Management Plan (CESMP), and any project-specific cultural heritage assessment or management measures, as applicable.

This Guidance Document provides the basis for developing and implementing a project-specific Chance Finds Procedure (CFP), where required based on the results of the project's Environmental and Social Screening Form (Annex A) and Environmental and Social Assessment (ESA). As part of the preparation of the ESA, IDB ESPS 8 requires projects to identify cultural heritage receptors within the project Area of Influence and assess potential impacts to previously recorded cultural heritage receptors and the risk of impacting previously

undiscovered receptors during project construction and operations. Efforts to identify cultural heritage receptors, determine their cultural importance/value to stakeholders and sensitivity to impacts, the significance of project impacts, and development of management measures will be done in consultation with cultural heritage stakeholders and national cultural heritage regulators as part of the project Stakeholder Engagement Plan (SEP).

If the project specific ESA determines the project is located in an area or location where cultural heritage is expected to be found or there is a risk of impacts to previously unidentified cultural heritage during construction or operations, the project will implement the CFP provided in this Annex. The objectives of the CFP are to:

- Define the procedures to be followed to ensure appropriate management of chance finds, while also minimizing disruption to the construction schedule;
- Provide a consistent approach to chance find management to streamline project team acceptance of and compliance with the CFP; and
- Align project activities with relevant provisions of Bahamian law and IDB ESPS 8.

The CFP will be implemented by Contractors during construction of a project, but MOHLR, through its Project Implementation Unit (PIU), is ultimately accountable for its implementation.

2. APPLICABILITY

The CFP applies to all forms of tangible cultural heritage that could be encountered during project construction activities. IDB ESPS 8 defines tangible cultural heritage as:

> *"tangible forms of cultural heritage, such as tangible moveable or immovable objects, property, sites, structures, or groups of structures, having archaeological, paleontological, historical, cultural, artistic, and religious value; and (ii) unique natural features or tangible objects that embody cultural values, such as sacred groves, rocks, lakes, and waterfalls."*

ESPS 8 defines a "chance find" as the discovery of cultural remains of an archaeological, historical, or paleontological nature during project construction. Under this definition, chance finds can be divided into two categories: archaeological and paleontological receptors.

Resource Type	Definition
Archaeological Resources	Archaeological sites, which can be terrestrial or underwater, are the material remains of past human activities. Terrestrial archaeological sites include, but are not limited to, the remains of human settlements, concentrations of artifacts such as pottery sherds and stone tools, and human burials. Terrestrial archaeological sites can be on the surface, buried beneath the surface, or both. Underwater archaeological sites include, among other things, shipwrecks and terrestrial archaeological sites along the coast that have been inundated by sea level rise.
Paleontological Resources	Any fossilized remains, traces, or imprints of organisms, preserved in or on the Earth's crust, which are of paleontological interest and provide information about the history of life on Earth.

Consistent with the IDB's definition of chance finds and the Program's commitment to safeguarding all forms of cultural heritage, this CFP is designed to manage the unanticipated discovery of tangible cultural heritage that may be encountered and affected during construction activities. A Cultural Heritage Professional (CHP) and project personnel are jointly responsible for implementing this procedure. The CHP is responsible for identifying previously undocumented cultural heritage resources within the project footprint, assessing potential impacts, and ensuring that appropriate management measures are initiated, including immediate reporting, temporary suspension of works in the affected area, and coordination with relevant authorities and stakeholders to determine culturally appropriate treatment and mitigation strategies.

2.1 ACTIVE AND PASSIVE CULTURAL HERITAGE MONITORING

The CFP utilizes two types of monitoring to identify chance finds: active and passive construction monitoring. Active monitoring is performed by a professional CHP who observes construction activities with the sole purpose of identifying previously undocumented archaeological, built heritage, and living heritage within and adjacent to project work areas.

Passive construction monitoring refers to monitoring performed by non-cultural-heritage specialists during their day-to-day activities. Passive monitoring relies on project staff and subcontractors being aware of the potential for cultural heritage to be present in their work area, the types of resources that may be present, and an understanding of the stop-work and reporting protocols of this CFP. Cultural heritage awareness training will be provided to all project personnel and subcontractors to increase the effectiveness of passive monitoring efforts (Section 7).

2.2 CULTURAL HERITAGE PROFESSIONAL

The Contractor will engage a qualified, professional Cultural Heritage Professional (CHP) to respond to tangible cultural heritage encountered during construction. The CHP may either be on site during construction works or be on call to respond to potential chance finds. The CHP will meet the following professional qualifications:

- An advanced degree (Master of Arts [MA] or equivalent) in the archaeology, anthropology, history, or paleontology of the Caribbean region;
- A minimum of five (5) years of experience directing archaeological investigations, or a minimum of two (2) years of experience supervising/monitoring construction works; and
- Professional experience consulting with national government regulatory agencies, ministries, and/or departments.

3. TIERED APPROACH TO CHANCE FINDS

The CFP implements a two-tiered strategy for identifying, documenting, evaluating, and reporting chance finds. This approach aims to minimize the impact on resources and timelines associated with addressing chance finds while ensuring compliance with the cultural heritage laws and regulations of The Bahamas and IDB ESPS 8.

To prevent significant project delays and to reduce the consultation burden, the CFP defines two chance find tiers with different reporting, documentation, and consultation requirements:

- **Minor Chance Finds:** tangible cultural heritage that has limited or no cultural or scientific value to local, national, or international stakeholders, such as isolated/individual archaeological artifacts, isolated trace fossils, and historic materials.
- **Significant Chance Finds:** tangible cultural heritage resources that have significant cultural and/or scientific value to local, national, or international stakeholders, such as large intact, complex archaeological sites, historic building ruins, or vertebrate fossil remains.

If the CHP determines that a chance find is a Significant Find, all work will be stopped in the vicinity of the find, and the Contractor and the CHP will consult with the AMMC to develop and implement a Resource-Specific Management Plan (RSMP) to avoid, minimize, and/or mitigate project impacts to the Significant Find.

Under the CFP, the CHP will be empowered by the Antiquities, Monuments and Museums Corporation (AMMC) to address minor chance finds through in-field documentation and implementation of expedient management measures to avoid, minimize, and/or mitigate impacts, without consultation or a site visit by AMMC representatives.

4. CHANCE FINDS PROCEDURE

The following steps will be followed whenever a potential chance find is identified during project activities.

1. **Stop Work –** In the case of a potential chance find, Contractor or subcontractor staff will stop all work in the vicinity of the find.
2. **Initial Notification –** Construction supervisors, field personnel, and staff will be notified of the stop work. If the CHP is not already present, they will be notified of the potential chance find within two (2) hours of discovery.
3. **Demarcation and Site Protection –** The Contractor will cordon off an area around the potential chance find, with a minimum buffer of 15 m, established as a no-go area / total protection zone to secure the find and prevent disturbance. Further measures will be taken to protect the potential chance find, including the installation of warning tape, fencing, and/or avoidance signs, as necessary.
4. **Document Find –** The CHP will document the potential chance find using narrative notes, digital photography, GPS coordinates, and hand-drawn or digital maps, as appropriate.
5. **Evaluation –** The CHP will perform a preliminary evaluation to determine whether the find is a cultural heritage resource and, if so, whether it is a minor or significant chance find. The CHP will also assess whether it is isolated or part of a larger site or structure. The evaluation will result in one of the following outcomes:
6. If the find is not cultural, the CHP will authorize the removal of site protection measures and activity can resume.
7. If it is a minor chance find, the CHP will document the find and develop temporary management measures to avoid or minimize potential impacts, which could include documenting and collecting/removing isolated archaeological artifacts or fossils.
8. If it is a significant chance find, human remains, or a minor find that cannot be collected or avoided, the CHP will work with the construction team to install protective measures around the find and, if possible, develop a plan to allow construction works to proceed around the find buffer.
9. **Notification of Authorities –** Significant chance finds and human remains require notification of relevant government authorities.
10. If the find is determined to be a significant chance find, the CHP will notify the AMMC within twenty-four (24) hours of evaluating the find.
11. If the find is determined to include human remains, the CHP will immediately notify the Contractor, who will in turn notify local law enforcement and relevant community or religious leadership to alert the community of the find, respecting legal requirements and local sociocultural and faith-based traditions.
12. **Chance Find Report –** The type and timing of reporting depend on the results of the chance finds assessment performed by the CHP:
13. If the find is determined to be a minor chance find, the CHP will document the find in the field, implement expedient management measures, allow construction to continue, and provide the AMMC with a summary report of the find within five (5) days.

14. If the find is determined to be a significant chance find or a minor find that cannot be collected or avoided, work will be suspended around the find and the CHP will provide the AMMC with a summary report of the find within forty-eight (48) hours.
15. **AMMC Response –** After receiving notification of a significant chance find, the AMMC will determine within twenty-four (24) hours of notification whether to send a representative to conduct a site visit to assess the find. If a site visit is deemed necessary, it will occur within forty-eight (48) hours of notification. Costs for transportation and additional expenses for the site visit will be paid by the Contractor.
16. **RSMP –** For Significant Chance Finds or Minor Finds that cannot be avoided, the CHP will prepare a report that includes recommendations to manage the find (the RSMP). If the AMMC chooses to conduct a site visit, the RSMP will be developed in consultation with the AMMC representative during the visit. Options to be considered in the RSMP include:
    - **Avoidance:** minimizes impact to the resource through partial project redesign or relocation of project components. This is the preferred option from a cultural heritage management perspective and aligns with international standards.
    - **In-situ Protection or Management:** application of site protection measures, such as fencing or barricades, or capping the site area with fill during construction, followed by removal of all protective measures after construction activities are complete.
    - **Surface Collection:** for archaeological or paleontological resources, if a site is assessed as having limited salvage excavation potential but contains significant surface artifacts or fossils, those surface finds may be mapped and collected.
    - **Evaluation Excavations:** for archaeological and paleontological resources, if the CHP and AMMC representatives cannot determine, based on available information, whether the resource requires a rescue excavation, they may recommend conducting a test excavation to further evaluate the find.
    - **Rescue Excavation:** if a significant archaeological or paleontological resource is encountered and the project cannot sufficiently avoid or minimize impacts, the AMMC may require a more extensive rescue excavation, consisting of the controlled excavation and documentation of the portion of a resource that will be impacted, conducted by a team of trained/qualified archaeologists or paleontologists.
17. **RSMP Review –** The AMMC will review the RSMP for the significant chance find and will provide comments/revisions or approve the plan within five (5) days of receiving it. The CHP will revise the plan to address AMMC comments and resubmit it within two (2) days of receiving comments.
18. **RSMP Implementation –** Upon receiving AMMC approval, the CHP will implement the RSMP with the support of the Contractor and experts from the AMMC. While treatment is ongoing, the CHP will coordinate with on-site personnel to keep them informed of the status and schedule of the RSMP and when construction may resume.
19. **Resume Work –** After the RSMP is complete, the AMMC will provide the project with written approval to resume construction activities. After receiving approval, construction activity will be allowed to resume at the chance find location.

5. MANAGEMENT OF CHANCE FINDS – HUMAN REMAINS

If skeletal remains or bones are discovered, the CFP detailed in Section 4 will apply. The CHP will attempt to identify whether the skeletal remains/bones are human. If they are determined to be human remains, the Contractor will immediately notify the AMMC and local police authorities. Construction activities will not resume until all legal requirements, and the reasonable requests of local communities and stakeholders have been adequately addressed.

6. RECORD KEEPING

The CHP will maintain chance finds documentation and RSMP records, including:

- Weekly reports summarizing chance finds identified, assessments and evaluations, internal and external communications and instructions, and supporting photographic documentation (or other reference materials as appropriate);
- Monthly reports summarizing monitoring and evaluation results, the status of any active RSMPs, and other internal and external communications;
- Technical reports detailing the results of any RSMPs implemented to address chance finds; and
- Any additional reports prepared to fulfil specific requirements of the AMMC.

Weekly and monthly chance finds procedure reports will be submitted to the AMMC for review and comment in lieu of formal technical reports. Technical reports will be submitted to the AMMC for any RSMPs implemented to resolve chance finds.

> *Chance finds documentation, RSMP status, and any significant findings shall also be summarized in the project's periodic Environmental and Social monitoring reports to the IDB, consistent with Section 5.1 of the ESMF.*

7. CULTURAL HERITAGE AWARENESS TRAINING

The Contractor will develop cultural heritage awareness training materials, including training specific to the identification of chance finds and the implementation of this CFP, for all on-site project staff. The goal of the training is to develop a basic understanding of the following:

- Types and characteristics of archaeological resources that could be encountered during construction activities;
- Stop-work, site protection, and reporting procedures in the CFP; and
- The importance of cultural heritage resources to local, national, and international stakeholders.

Training materials will be developed by a cultural heritage specialist and reviewed and approved by the AMMC to ensure they accurately reflect the CFP and Bahamian regulatory requirements. Cultural heritage awareness training will be provided to all project personnel and subcontractors with the potential to encounter cultural heritage resources during their day-to-day activities, as part of the standard project induction training (consistent with Annex D-1, Code of Conduct).

Annex M

Sexual, Exploitation and Abuse/ Sexual Harassment Prevention and Response Guidance Document

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

1. INTRODUCTION AND SCOPE

1.1 INTRODUCTION

This Guidance Document establishes the Program-level framework and minimum requirements for preventing and responding to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH). It is intended to guide the Program and project implementing entities in identifying, assessing, preventing and managing SEA/SH risks throughout the project lifecycle.

This Guidance Document shall be applied when the screening process established under the ESMF Annex A identifies SEA/SH risks that require specific management measures. The findings of the screening and, where applicable, the environmental and social assessment shall determine whether project-specific SEA/SH measures are required. Where such risks are identified at project level, the relevant requirements of this document shall be incorporated into the applicable project-level environmental and social management instruments, including the ESMP, as appropriate.

1.2 SCOPE

The purpose of this document is to ensure that identified SEA/SH risks are addressed through a consistent, proportionate and context appropriate approach across the Program. While SEA/SH forms part of the broader spectrum of gender-based violence (GBV), this document does not constitute a comprehensive GBV prevention and response plan. It establishes minimum requirements for risks assessment, prevention, reporting, referral, response, monitoring, and institutional responsibilities. Project-specific measures should be proportionate to the level and nature of the identified risks and adapted to the local context, including the availability and accessibility of appropriate referral and support services.

The implementation of this document is based on the principles of confidentiality, survivor safety, respect, non-discrimination, informed consent, and accountability, ensuring that allegations are managed through a survivor-centered approach consistent with national legislation and the requirements of the IDB's ESPF.

1.3 KEY DEFINITIONS

The following definitions are based on internationally recognized standards and guidance, including the IDB ESPS, United Nations terminology, and other Guidelines on Gender-Based Violence.

Term	Definition
Sexual and gender-based violence (SGBV)	Refers to any act that is perpetrated against a person's will and is based on gender norms and unequal power relationships. It encompasses threats of violence, coercion, and harassment. It can be physical, emotional, psychological, or sexual in nature, and can take the form of a denial of resources or access to them. It inflicts harm on people of all genders (IDB ESPF).
Sexual Exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another.
Sexual Abuse	Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Term	Definition
Sexual Harassment	Any unwelcome sexual advance, request for sexual favors, or other unwelcome verbal, non-verbal, or physical conduct of a sexual nature that interferes with work, is made a condition of employment, or creates an intimidating, hostile, or offensive working environment.
Survivor-Centered Approach	An approach that places the rights, needs, safety, dignity, and informed choices of the survivor at the center of all prevention and response measures, ensuring confidentiality, respect, non-discrimination, and access to appropriate services.

1.4 OBJECTIVES

- Prevent and mitigate SEA/SH risks through Codes of Conduct, training, awareness activities, and risk mitigation measures integrated into the Program's ESMP and related management plans.
- Provide safe, confidential, accessible, and survivor-centered reporting channels for Program and Program-sponsored project workers and affected communities.
- Monitor the implementation and effectiveness of SEA/SH prevention and response measures and report to the MOHLR and the IDB in accordance with Program reporting requirements, while protecting survivor confidentiality.

1.5 APPICABILITY

This document applies to the MOHLR, contractors, subcontractors, consultants, supervision personnel, security personnel, and any other Program-related workers engaged in Program or related project activities. It also applies to all interactions between Program and Program-related project workers and affected communities, including residents, relocated households, neighboring communities, visitors, suppliers, and other stakeholders who may be exposed to SEA/SH risks associated with the Program.

The SEA/SH measures developed under this document shall be implemented in conjunction with the Project's ESMP, LMP, SEP, Grievance Mechanism, Code of Conduct, Community Health and Safety Plan (CHSP), and other relevant Program and project management instruments, as applicable. Where SEA/SH Plan is required, the Plan developed under this framework may be incorporated into the Project's ESMP, as appropriate, provided that all applicable requirements of this framework are addressed.

2. ROLES AND RESPONSIBILITIES

Role	Responsibilities
MOHLR/PIU	Provides overall oversight of implementation of the SEA/SH measures established under this framework and incorporated into the applicable project-level environmental and social management instruments, including the SEA/SH plan where required; ensures adequate resources are available; monitors contractor compliance; reviews SEA/SH performance reports; ensures contractual enforcement of the Code of Conduct; and reports significant incidents to the IDB in accordance with applicable reporting requirements.
Gender/SEA-SH Focal Point (Contractor level)	Serves as the first point of contact for SEA/SH concerns at the worksite; promotes awareness of the Code of Conduct and SEA/SH prevention measures; coordinates worker training and induction; receives complaints through designated channels; immediately refers survivors to the appropriate focal point and service providers without investigating allegations; maintains confidentiality; and reports incidents in accordance with the Plan and contractual requirements.
Social/Gender/SEA-SH Specialist (MOHLR/Supervision level)	Oversees implementation of the SEA/SH Prevention and Response Plan across the Program; provides technical guidance and capacity building; maintains a confidential incident register; coordinates referral pathways with qualified service providers; monitors implementation of preventive measures; prepares anonymized reports for MOHLR management and the IDB; and ensures compliance with survivor-centered principles and confidentiality requirements.
Ethics/Disciplinary Committee	Reviews substantiated findings or investigation outcomes involving Program personnel or contractors, as appropriate; determines disciplinary or contractual measures in accordance with applicable legislation, employment policies, and contractual provisions; and ensures that administrative actions are implemented while maintaining confidentiality and protecting survivors and complainants from retaliation.
External Service Providers	Provide survivor-centered health, psychosocial, legal, security, and protection services. Service providers shall be identified and mapped prior to construction mobilization in accordance with the Gender/SEA/SH Risk Assessment. Where adequate services are unavailable locally, MOHLR shall ensure that survivors have timely access to appropriate support through Program-funded transportation to the nearest available service, agreements with qualified providers, or other appropriate service delivery arrangements, so that survivors are not denied access to care due to local service gaps.

2.1 CONFLICT OF INTEREST AND RECUSAL

Where a SEA/SH allegation involves a member of MOHLR, the Supervision Consultant, the Gender/SEA/SH Specialist, or any designated SEA/SH Focal Point, that individual shall be

immediately recused from all aspects of case management, including the receipt of complaints, case assessment, referral, investigation, decision-making, and follow-up.

The case shall be escalated immediately to a designated senior official within MOHLR who has no actual or perceived conflict of interest and who is authorized to oversee the case in accordance with this Plan. Where appropriate, MOHLR shall appoint an independent investigator or engage qualified external expertise to ensure an impartial process.

All allegations shall continue to be managed in accordance with survivor-centered principles, maintaining strict confidentiality, protecting survivors and complainants from retaliation, and complying with applicable legal requirements and the reporting obligations established under the IDB Environmental and Social Policy Framework.

3. MANAGEMENT MEASURES

3.1 SEA/SH RISKS ASSESSMENT

Where the screening under Annex A identifies SEA/SH-related risks and impacts, the ESA shall assess the relevant gender-related risks and differentiated impacts associated with the Project. Based on the findings of the ESA and the nature, scale and complexity of the Project, the ESA shall determine whether further gender analysis is required and whether a project-level SEA/SH Prevention and Response Plan shall be prepared. A more detailed gender assessment may be included in the ESA or prepared as a separate instrument where warranted.

3.2 GENERAL PREVENTION MEASURES

3.2.1 Code of Conduct

All direct workers, contracted workers, and security personnel engaged by the Program and related projects shall sign the applicable Code of Conduct prior to mobilization. The Code of Conduct may address SEA/SH and other relevant worker and community conduct requirements, including, as appropriate, substance, use, respectful workplace behavior, driving and road safety, and other project-specific risks. A single Code of Conduct or separate codes may be used, as appropriate to the Project and workforce arrangements. The applicable Code (s) of Conduct shall be consistent with the Labor Management Framework and project-site specific one and other relevant ESMS instruments.

For this Annex, the Code of Conduct shall at minimum:

1. Prohibit SEA/SH in absolute terms, including exchange of money, employment, goods, or services for sex, and sexual relationships with minors regardless of local age-of-consent laws.
2. Establish disciplinary consequences for violations, up to and including termination and referral to law enforcement with a survivor approach.
3. Require respectful conduct toward community members and prohibit the use of language or behavior that is sexually coercive, threatening, abusive, or exploitative.
4. Be available in languages and formats accessible to the workforce.

3.2.2 Training

- Mandatory pre-mobilization training for all workers and supervisors on the Code of Conduct, the definitions of SEA/SH, and reporting channels. Training shall be delivered in English with Haitian Creole interpretation available (as required).
- Periodic (at minimum bimonthly) refresher training, with attendance records maintained.
- Specialized training for the Gender/SEA-SH Focal Points and Ethics/Disciplinary Committee members on survivor-centered response and case management.
- Community awareness sessions on the Code of Conduct and how to report concerns, coordinated with the SEP.

3.2.3 Risk-Informed Design Measures

The following physical and operational measures shall be calibrated to the specific context of a Project, a setting with pre-existing SGBV risks and vulnerabilities, lessons and vulnerabilities identified following major disasters such as Hurricane Dorian social, and, where applicable, the

characteristics and composition of the project workforce, including the potential presence of migrant workers:

- **Worksite perimeter**: all active worksites shall maintain continuous perimeter fencing and adequate nighttime lighting to deter unauthorized access and to improve the safety of the surrounding area, particularly for women and girls, consistent with the requirements established in the Community Health and Safety Management Plan (CHSMP) based in ESPS4, where required. The need for a project-specific CHSMP shall be determined through the Environmental and Social Assessment (ESA) or risks and impacts assessment.
- **Worker accommodation:** Where workers are housed in temporary accommodation near the worksites, accommodation sites shall be located and managed to limit unsupervised worker–community interaction. Rules of conduct for accommodation occupants shall be established and enforced through the Code of Conduct. Accommodation arrangements shall respect workers' rights, dignity, privacy, and freedom of movement, and shall not involve any form of coercion or forced confinement.
- **Alcohol management**: sale or consumption of alcohol shall be prohibited within worksite boundaries and at worker accommodation facilities.
- **Supervision hours:** Worksite supervision shall not be limited to standard working hours; supervisory presence or CCTV coverage shall be maintained at site boundaries during the early morning and evening hours when worker-community interaction risk is highest in a residential setting. CCTV should only be used where justified by the risks identified in the ESA and its use should include clear purpose, data access controls, retention periods, notice, and complaint procedures through the Grievance Mechanism.
- **Gender/SEA-SH Focal Point**: SEA/SH focal point shall be regularly present in the immediate surrounding residential blocks, not limited to formal engagement events, to monitor community safety perceptions and identify early warning signs of worker-community tension.

3.3 SEA/SH MANAGEMENT

The Program shall establish and maintain an effective Grievance Mechanism (GM), which may serve as the community grievance process applicable under ESPS 1 and ESPS 10. The GM shall include specific procedures for receiving and managing SEA/SH complaints in a safe, confidential, gender sensitive, and survivor-centered manner. These SEA/SH specific procedures should include:

- **Multiple reporting channels:** Survivors or third parties may report incidents in person to the Gender/SEA-SH focal point, through a dedicated telephone hotline (operational 24 hours, 7 days week); in writing (including anonymous reporting boxes located in a community location accessible without entering the worksite)
- **Language accessibility**: all reporting channels shall be available in English and English/Haitian Creole with interpretation.
- **Confidentiality:** Survivor and case details should be strictly confidential. Case details shall only be shared with personnel directly involved in case management on a strict need-to-know basis.
- **Non-retaliation guarantees for complainants and witnesses,** including for Haitian origin members who may fear immigration-related consequences; the reporting channel shall be explicitly documented as accessible regardless of immigration status.

- **Report Anonymously:** option to report anonymously, recognizing this may limit the scope of possible response.
- **Child sensitive:** mitigation measures for reports involving minors, including mandatory referral to child protection services.

3.4 REFERRAL PATHWAY AND SERVICE MAPPING

The Contractor shall develop and maintain a documented SEA/SH referral pathway, identifying and establishing formal referral arrangements with qualified service providers in the area of influence. The referral pathway shall include, at a minimum:

- Medical care, including emergency treatment, post-assault and reproductive health services
- Psychosocial support / mental health
- Legal assistance and protection
- Support for Haitian-origin survivors
- Child protection services where the survivor is underage
- Emergency shelter and protection services
- Interpretation and culturally appropriate support services for vulnerable groups

The service map shall be maintained as a living document by the Gender/SEA/SH Specialist and updated at least every two months. Where service gaps cannot be addressed by local providers, the MOHLR and the contractor shall identify appropriate interim referral arrangements and implement measures to strengthen survivors' access to available services.

3.5 MONITORING AND REPORTING

- Update the community-level SGBV baseline screening results reported to MOHLR before mobilization and used as the reference baseline for monitoring any change in community-level SGBV risk during the construction period.
- Maintenance of a confidential SEA/SH case register, accessible only to designated personnel, on a need-to-know basis.
- Aggregate, de-identified reporting on the number and nature of SEA/SH cases, response times, referral outcomes, and Code of Conduct training coverage, included in the Project's quarterly environmental and social monitoring reports.
- Immediate notification (within 24 hours of detection) to MOHLR and the IDB of any case involving a minor or any case presenting an immediate safety risk.
- Bimonthly review of the community SGBV risk context, training coverage, use of reporting channels, adequacy of referral pathways, and overall effectiveness of the response system to support continuous improvement.

3.5.1 Key Performance Indicators (KPIs)

Indicator	Unit	Frequency
Percentage of workforce completing pre-mobilization Code of Conduct training	%	Pre-mobilization; quarterly

Indicator	Unit	Frequency
Number of SEA/SH reports received through each reporting channel	Number by channel	Monthly
Number of SEA/SH allegations involving Project workers reported to MOHLR/IDB	Number	Monthly (immediate if minor involved)
Number of community awareness sessions conducted (disaggregated by audience including Haitian Creole sessions)	Number	Quarterly
Referral pathway updated/confirmed operational	Yes/No	Annually; after service gap identified

3.6 REVIEW AND UPDATE

This SEA/SH Prevention and Response Plan is a living document and shall be reviewed before the start of construction at each Project site, and updated whenever there are material changes in scope, location or community context or incident. Results of community consultations and grievance feedback shall be considered in each review cycle.

Annex N

Stakeholder Engagement Framework and Grievance Redress Mechanism Framework

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

1. INTRODUCTION

This Stakeholder Engagement Framework (SEF) establishes the principles, criteria, and procedures that will guide stakeholder engagement across new Projects financed under the Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064). It serves two purposes: i) to provide the framework and requirements that each new project shall follow in preparing its Stakeholders Engagement Plan (SEP) and ii) to provide the requirements and requirements and guidance for establishing the Program-wide Grievance Redress Mechanism (GRM).

Because some of the specific Projects, sites, and beneficiary communities to be financed under the Program are not fully defined at this stage, this Framework does not set out project-specific engagement activities, schedules, or named stakeholders. Instead, it establishes the process and criteria by which such details will be defined and updated for each new project as it is identified during Program implementation. Each project shall prepare its own SEP in accordance with this framework once its scope, location, and affected people are known. The Program wide GRM shall be established in accordance with the requirements and template provided in this framework and shall apply across the Program, with project-level arrangements established as necessary to address project-specific circumstances.

The GRM is an integral component of the stakeholder engagement under BH-L1064 and is intended to provide affected and interested stakeholders with an accessible, inclusive, timely, and transparent means of raising concerns, submitting complaints, and seeking resolution of project-related issues. The GRM shall be designed to be accessible to all stakeholders, including potentially vulnerable or disadvantaged groups, and shall include appropriate procedures for the confidential handling of complaints where necessary. The operation of the GRM shall be documented, monitored, and reported in accordance with the requirements established in this Framework.

This Framework is prepared in accordance with Environmental and Social Performance Standard (ESPS) 10: Stakeholder Engagement and Information Disclosure, as well as ESPS 1: Assessment and Management of Environmental and Social Risks and Impacts, and ESPS 9: Gender Equality.

Stakeholder engagement is an inclusive, continuous, and iterative process that takes place throughout the Program and project lifecycle, including preparation, implementation, and closure. The process must be properly designed and implemented to foster constructive, responsive, and lasting relationships with stakeholders, thereby supporting the effective management of environmental and social risks and impacts.

The nature, scope, and frequency of stakeholder engagement for each project shall be commensurate with its nature, scale, implementation schedule, and potential environmental and social risks and impacts. The Ministry of Housing and Land Reform (MOHLR), as the Executing Agency, is responsible for planning, applying, and evaluating stakeholder engagement and information disclosure activities across the Program.

The entire stakeholder engagement process must be appropriately documented. MOHLR shall take necessary steps to maintain confidentiality where required and to protect personal data in accordance with applicable legal and institutional requirements.

Where a project requires land acquisition and may result in physical and/or economic displacement of Project Affected Persons (PAPs), stakeholder engagement activities related to resettlement will require a more intensive, iterative, and household-centered approach than the general engagement activities described in this Framework. Project-specific resettlement consultation requirements are addressed in Section 8.

1.1 PROGRAM DESCRIPTION

The Program aims to improve housing conditions in the Bahamas through the redevelopment and/or construction of safe, affordable, and climate-resilient housing, including the rehabilitation of deteriorated residential structures and associated infrastructure. Projects financed under the Program may involve demolition of unsafe structures, site clearance and remediation, construction of new housing, installation or upgrading of supporting infrastructure and utilities, landscaping, and other associated site improvements, in locations to be determined during Program implementation.

Because project locations, scale, and specific affected populations are defined progressively as the Program is implemented, this Framework provides the criteria and process for identifying stakeholders, disclosing information, and conducting consultation for each new project once it is identified, rather than committing to fixed activities or dates in advance.

1.2 OBJECTIVE OF THE FRAMEWORK

The objective of this SEF/GRM framework is to establish the principles, criteria and procedures for stakeholder engagement across Projects financed under the Program. It has two main purposes:

- To provide the requirements and guidance that each new Project shall follow to prepare and implement its Project-specific SEP, and
- To provide the requirements, guidance, and template for establishing and implementing the Program-wide Grievance Redress Mechanism (GRM).

1.3 PRINCIPLES OF STAKEHOLDER ENGAGEMENT

Stakeholder engagement under this Framework, and under all project SEPs prepared pursuant to it, shall be guided by the following principles:

- **Inclusive:** engagement processes shall seek the participation of all relevant stakeholders, including those who are vulnerable or disadvantaged, and shall use methods appropriate to the local context.
- **Meaningful:** engagement shall provide stakeholders with sufficient, accessible, and timely information to enable them to provide informed feedback that can genuinely influence project design and management measures.
- **Transparent:** the objectives, process, and outcomes of engagement activities shall be clearly communicated and documented.
- **Culturally** appropriate: engagement methods, language, and materials shall be adapted to the customs, literacy levels, and preferences of the stakeholders involved.
- **Gender-responsive:** engagement shall actively seek the participation of women and consider differentiated impacts and barriers to participation, consistent with ESPS 9.
- **Free of manipulation,** interference, coercion, or intimidation: stakeholders shall be able to participate without fear of retaliation.
- **Documented and adaptive:** engagement activities and their outcomes shall be recorded, and engagement approaches shall be adjusted based on lessons learned and stakeholder feedback.

1.4 APPLICABLE IDB ESPS

This Framework, and any project SEP prepared under it, shall be implemented in a manner consistent with the following IDB Environmental and Social Performance Standards, as applicable to each project:

ESPS	Title	Relevance to Stakeholder Engagement
ESPS 1	Assessment and Management of Environmental and Social Risks and Impacts	Determines the level and intensity of stakeholder engagement required based on project risk categorization
ESPS 5	Land Acquisition and Involuntary Resettlement	Requires intensive, household-centered consultation where land acquisition or displacement is involved
ESPS 9	Gender Equality	Requires gender-disaggregated data, inclusion of women and vulnerable groups, and GBV protocols in the grievance mechanism
ESPS 10	Stakeholder Engagement and Information Disclosure	Establishes requirements for continuous, inclusive, and transparent engagement; meaningful consultation; and a grievance mechanism

2. INSTITUTIONAL ARRANGEMENTS FOR FRAMEWORK IMPLEMENTATION

MOHLR, as the Borrower and Executing Agency, is responsible for leading and applying this Framework across the Program, and for ensuring that each project SEP is prepared and implemented consistently with it. To ensure compliance with IDB ESPS, MOHLR will establish and maintain a dedicated team, which may comprise a Stakeholder Coordinator, Community Liaison Officers, and a Grievance Mechanism office, including a GBV focal point, as described below.

2.1 INSTITUTIONAL STRUCTURE AND RESPONSIBILITIES

Unit / Role	Responsibilities	Reporting Line
SEP Coordinator (MOHLR)	Overall coordination, planning, monitoring, and reporting of stakeholder engagement across the Program, including oversight of project SEP preparation	MOHLR Director General / IDB
Community Liaison Officers (CLOs)	Community outreach, event facilitation, local-level complaint intake, follow-up, at project level	SEP Coordinator
GRM Officer	Complaint receipt, registration, tracking, classification, escalation, and closure Program-wide	SEP Coordinator
GBV Focal Point	GBV complaint intake, referral to health/psychosocial services, confidential management	SEP Coordinator, in coordination with MOHLR Social Unit
Contractor E&S Supervisor	On-site complaint intake and implementation of E&S mitigation measures during works, per project	MOHLR SEP Coordinator

3. STAKEHOLDER IDENTIFICATION AND MAPPING

Because new Projects under the Program are not yet individually defined, this Framework does not include a fixed list of named stakeholders. Instead, it establishes the criteria and generic categories that shall be used to identify and map stakeholders once a specific project, and its location, are known, to create a project-specific SEP.

3.1 STAKEHOLDER IDENTIFICATION CRITERIA

For each project, stakeholders shall be identified based on, at minimum, the following criteria:

- Project Affected Persons (PAPs): persons, communities, households, and businesses within or adjacent to the project's construction zone or area of influence.
- Regulatory or institutional role: government bodies with permitting oversight, service provision functions, or other regulatory interest in the project.
- Advocacy and civil society role: NGOs, community-based organizations (CBOs), and associations with interests in housing, environment, or social equity in the project area.
- Vulnerable groups: including, as relevant to the project location, women-headed households, persons with disabilities, older persons, LGBTIQ+ individuals, migrant or minority-language-speaking populations, and low-income residents.

The stakeholder identification criteria above are minimum requirements. Additional stakeholders may be included where MOHLR or the project SEP determines that doing so is necessary to ensure a broad, representative, and meaningful participatory process.

3.2 GENERIC STAKEHOLDER CATEGORIES

The following table presents the generic categories of stakeholders typically relevant to housing redevelopment Projects under the Program. Each project SEP shall populate this structure with the specific stakeholders identified for that project, together with their relationship to the project, interest level, influence level, and the phase(s) at which they should be engaged.

Type	Generic Category	Typical Basis for Inclusion	Typical Engagement Stage(s)
Institutional	Executing Agency	Overall responsibility for the project	All phases
Institutional	National/local permitting or regulatory authorities	Permitting, land use, or environmental regulatory oversight applicable to the project location	Preparation, Construction
Institutional	Public health and safety authorities	Public health or safety oversight relevant to the project	Construction
Institutional	Utility providers	Service continuity affected by works	Construction
Institutional	Security/public order authorities	Security and social order during works	Construction

Type	Generic Category	Typical Basis for Inclusion	Typical Engagement Stage(s)
Community	Residents in the project's direct area of influence	Directly affected by project risks and impacts	All phases
Community	Women-headed households / vulnerable groups	Priority beneficiaries; heightened vulnerability	All phases
Community	Minority-language-speaking or migrant community members (where present in the project area)	Language/cultural access barriers; potentially affected	All phases
Community	Businesses and informal workers in the area of influence	Economic disruption during construction	Construction
Civil Society	Schools, health centers, and places of worship in the area of influence	Service disruption, dust/noise impacts	Construction
Civil Society	Civil society organizations (housing, environment, social equity)	Advocacy; monitoring of implementation	Preparation, Operation
Community	Potential Project Affected Persons (PAPs) for resettlement	Directly affected by displacement risk and/or benefits	All phases

This table is illustrative and non-exhaustive. It shall be adapted and completed for each project based on the specific context of that project's location and affected population.

3.3 PROJECT-LEVEL STAKEHOLDER MAPPING

For each project, MOHLR (or its designated consultant) shall prepare a stakeholder mapping, using the criteria and categories above, as an integral part of the project SEP. The stakeholder mapping shall be considered a living document and shall be updated before each engagement phase to reflect the evolving project context, new information gathered through community liaison, or changes in scope.

4. SCREENING AND DETERMINATION OF ENGAGEMENT REQUIREMENTS

4.1 ENVIRONMENTAL AND SOCIAL CATEGORIZATION

Each new project financed under the Program shall be screened and categorized in accordance with ESPS 1. Category A projects will not be eligible for finance under the Program. Eligible projects shall therefore be classified as category B or C, reflecting the significance of their potential environmental and social risks and impacts, following Annex A. The level of stakeholder engagement and consultation required for a given project shall be commensurate with its category, as set out below.

4.2 MINIMUM CONSULTATION REQUIREMENTS BY CATEGORY

In accordance with ESPS 10, the stakeholder engagement shall be conducted throughout the project lifecycle and shall include timely disclosure of information, meaningful consultation with Project Affected People, and ongoing reporting on environmental and social performance. The level and nature of the stakeholder engagement shall be proportionate to the project's environmental and social risks and impacts. As part of the environmental and social assessment and screening process, the project shall determine whether:

- Meaningful consultation with affected stakeholders is required in accordance with ESPS 1, paragraphs 32 and 33; or
- Informed Consultation and Participation (ICP) is required in accordance with ESPS, paragraph 34, where the Project may result in significant adverse impacts on the affected communities.

All stakeholder engagement process shall be commensurate with the nature, scale and significance of their environmental and social risks and impacts. This determination shall be documented in the project's environmental and social assessment and shall inform the preparation and implementation of the project-specific Stakeholder Engagement Plan, where applicable. At a minimum, and subject to the above determination:

- **Category B Projects**: Consultation shall be undertaken at appropriate stages of project preparation and implementation. At a minimum, where two rounds of consultation are warranted based on the project's risks and impacts, the first shall take place when the draft ESA/ESMP is ready and fit for disclosure, to obtain feedback for consideration in project design and management measures, and the second shall take place prior to project approval to disclosure the final E&S documentation and provide feedback on comments received during the consultation process.
- **Category C Projects:** given their minimal or no adverse environmental or social risks, may be subject to reduced engagement requirements, focused primarily on information disclosure; the applicable requirements shall be confirmed on a case-by-case basis and documented in the project's environmental and social screening record.

Where a project involves land acquisition and/or resettlement, the minimum consultation requirements above shall be complemented by the resettlement-specific consultation requirements described in Section 8, consistent with ESPS 5.

The project-specific SEP shall specify the stakeholders to be engaged, the information to be disclosed, the consultation methods and timing, the mechanisms for receiving and responding to feedback, and the measures to ensure that engagement is inclusive and accessible to potentially affected people.

5. STAKEHOLDER ENGAGEMENT PROCESS

Stakeholder engagement for each project shall be designed as a continuous, inclusive, and iterative process throughout the project lifecycle (preparation, construction, operation, closure). At minimum, the process shall:

- Ensure meaningful participation of all identified stakeholders, including vulnerable groups.
- Use culturally and linguistically appropriate communication, including minority languages where relevant to the project's location.
- Document all interactions and integrate stakeholder feedback into project design, environmental and social management measures, and monitoring frameworks.
- Monitor effective participation through defined indicators (gender-disaggregated data, grievance resolution rates, satisfaction surveys).

5.1 INFORMATION DISCLOSURE AND ACCESS TO INFORMATION

Timely and accessible disclosure of information is a prerequisite for meaningful stakeholder engagement for every project. Disclosure must occur before consultation events and must be maintained throughout the project lifecycle. At minimum, the following documents shall be disclosed for each project, as applicable:

- Non-Technical Project Summary (NTS)
- Environmental and Social Assessment (ESA) -- fit-for-disclosure draft
- Environmental and Social Management Plan (ESMP)
- Project-specific Stakeholder Engagement Plan (SEP)
- Grievance Mechanism -- community flyer
- Consultation Report (post-consultation)
- Semi-annual Compliance Reports (E&S)

Where a project involves resettlement, the following shall additionally be disclosed:

- Resettlement Action Plan (RAP) -- Non-Technical Summary
- Eligibility criteria
- Cut-off date
- Entitlement Matrix
- Compensation methodology
- Livelihood restoration measures
- Relocation schedule
- Grievance mechanism for the resettlement process and Frequently Asked Questions (FAQ)
- Contact information for resettlement assistance

To ensure information is accessible and clear to all stakeholders, for each project MOHLR shall:

- Publish all key documents in English, with non-technical summaries available in other languages relevant to the project's affected population.

- Make printed copies available at MOHLR offices, community centers, and public libraries serving the project area.
- Ensure digital documents are compatible with screen readers (accessible PDF format).
- Provide large-print or audio formats upon request for persons with disabilities.
- Post information on MOHLR's social media platforms in plain language.
- Distribute informational flyers door-to-door in the project's direct area of influence, with sufficient advance notice before construction begins, as specified in the project SEP.

MOHLR shall maintain a dedicated Program page on its institutional website throughout the Program duration. The page shall include Program and project descriptions, key E&S documents (ESA, ESMP, project SEPs, consultation reports), GRM contact information, and a digital grievance submission form. All documents must remain publicly accessible and shall not be removed from the site without IDB's prior agreement.

5.2 PUBLIC CONSULTATION AND COMMUNICATION

Every effort shall be made, for each project, to engage groups likely to be affected by its activities, as well as other interested stakeholders, regardless of whether they are directly affected.

Particular attention shall be given to ensuring the meaningful participation of vulnerable and disadvantaged groups that may face barriers to accessing consultation and engagement activities. These may include women, persons with disabilities or reduced mobility, persons experiencing homelessness, LGBTQI+ individuals, older persons, youth, migrant or minority-language-speaking populations, and other groups identified during project implementation. Consultation methods, communication channels, venues, and scheduling shall be designed to address these barriers and promote inclusive and equitable participation.

The stakeholder consultation process for each project shall include, at minimum, the following elements:

- Stakeholder mapping
- Identification of the information and documents to be disclosed
- Dissemination of consultation opportunities through the MOHLR website, social media, and other appropriate communication channels
- Development of content and documentation to be socialized
- Public consultation procedure
- Report of the public consultation process

5.2.1 Consultation Stages and Timing Criteria

Rather than fixed calendar dates, this Framework establishes the process stage and trigger at which each engagement activity shall occur. Each project SEP shall translate these triggers into a specific schedule once the project's implementation timeline is known.

Phase	Engagement Activity	Key Topics	Target Audience	Timing Trigger
Preparation	Formal Public Consultation Event(s)	Project description, E&S impacts, ESMP, GRM, alternatives considered	All identified stakeholders (per mapping)	Per the minimum rounds required for the project's ESPS category (Section 4.2 of this document)
Pre-construction	Community Information Campaigns (per worksite)	Construction schedule, traffic/noise/dust management, GRM contacts	Direct area of influence	Sufficiently in advance of works commencing at each site, as specified in the project SEP
Construction	Periodic community liaison meetings	Progress updates, complaints received, upcoming works, mitigation measures	Community representatives, CLOs, contractor	On a recurring basis (minimum quarterly), throughout construction
Construction	Vulnerable-groups-focused sessions	GBV risks, household-level impacts, service access, GRM	Women, older persons, persons with disabilities, migrants	At project start and as needed thereafter
Operation / Closure	Satisfaction survey and close-out consultation	Project outcomes, residual complaints, lessons learned	Beneficiaries and affected communities	At works completion

The specific timing of engagement activities for each project shall be established in its SEP based on good international industry practice and the project's implementation schedule.

5.2.2 Formal Public Consultation Events

For each project, the project SEP shall specify the number, format (in-person, virtual, or hybrid), and location of formal consultation events, consistent with the minimum requirements in Section 4.2 of this document. Consultation events shall be complemented by community information campaigns conducted prior to the start of works at each site, once engineering design details are known.

MOHLR shall be responsible for issuing invitations to consultation events. Invitations shall be issued directly to interested parties identified in the project's stakeholder mapping with sufficient advance notice, and in no case less than 14 days prior to the event date.

To ensure maximum stakeholder participation, each consultation event shall also be disclosed to the public starting at least 14 days prior to the event date, through publication in relevant information media (radio, local TV, digital media, print media) and on MOHLR's institutional website and social media profiles. Personal email submissions and brochure handouts may also be used to ensure adequate dissemination.

5.2.3 Preparation Requirements

- Publish all relevant project documents on the MOHLR and IDB project webpages at least 14 days prior to each consultation event.

- Issue formal invitations to all identified stakeholders (per mapping) at least 14 days in advance, via email, letter, and phone, providing clear information on the GRM, including how and where to submit a grievance, available submission channels, and how to obtain further information or assistance.
- Ensure that the applicable GRM is operational and accessible prior to the consultation event.
- Announce the event through local radio, local TV, digital media, newspaper, MOHLR website and social media, and printed flyers distributed in the direct area of influence.
- Prepare a Non-Technical Summary (NTS) of the ESA/ESMP for distribution at the event.
- Arrange for interpretation into relevant minority languages where a significant population speaking that language is identified in the project's area of influence.
- Ensure accessibility for people with disabilities (wheelchair access, large-print materials, assistance).

5.2.4 Content of the Invitation

At minimum, invitations to consultation events shall include:

- Project Proponent: MOHLR
- Project / Program identification
- Website where documentation (ESA/ESMP) is published and where queries or concerns may be submitted
- Procedure of the consultation process
- Duration of the consultation process
- Topics to be addressed, including project works, associated benefits, parties involved and institutional responsibilities, applicable regulatory framework and relevant standards, main environmental and social impacts identified, main management measures, and the grievance redress mechanism, including how further information or assistance may be obtained.
- Documentation available

5.2.5 Agenda and Content of Consultation Events

Consultation events shall cover, at minimum, the following topics:

- Welcome and introduction (MOHLR authority)
- Project objectives, description of works, and timeline
- Environmental and Social Assessment summary: main impacts and risks identified
- Environmental and Social Management Plan: key mitigation and monitoring measures
- Benefits associated with project operation (housing, infrastructure, services)
- Institutional responsibilities and organizational structure
- Applicable regulatory framework and IDB Environmental and Social Standards
- Grievance Mechanism: channels (Program GM: https://new.moh-ur.com/grievance) procedures, timelines.
- Gender-Based Violence risks and response protocols (adapted for public presentation)

- Open Q&A session (minimum 45 minutes), including questions from in-person and virtual participants
- Closing: next steps, consultation report publication schedule, and how feedback will be incorporated

See Section 9 for the Consultation Report structure to be completed following each event.

5.2.6 Engagement with Vulnerable Groups

For each project, MOHLR shall ensure targeted engagement with groups facing barriers to standard consultation processes, which may include, as relevant to the project location:

- **Women and women-headed households**: dedicated sessions at accessible community locations; female CLO presence; childcare arrangements may be recommended during meetings.
- **Minority-language-speaking residents**: translated materials; interpreter availability; culturally appropriate messaging.
- **Older persons and persons with disabilities**: home visits where mobility is limited; large-print or audio materials.
- **Informal and undocumented residents**: assurance of confidentiality; no requirement to provide formal identification to participate or file grievances.
- **LGBTIQ+ individuals**: safe and anonymous GRM channels; training on non-discrimination.

5.3 MONITORING FRAMEWORK AND PROJECT SEP EFFECTIVENESS

The following indicators shall be tracked by the Stakeholder Unit for each project and reported in MOHLR's Semi-annual Compliance Reports to the IDB:

Indicator	Baseline / Target	Frequency
% of identified stakeholders reached through disclosure/invitation	Target: 100% of mapped stakeholders	Per consultation round
Gender-disaggregated participation in consultation events	Target: ≥ 40% women participants	Per event
% of complaints acknowledged within the applicable deadline	Target: 100%	Quarterly
% of complaints resolved within the applicable deadline (by category)	Target: ≥ 90%	Quarterly
% of complainants who report that they were satisfied with the accessibility and fairness of the GRM process	Target: ≥80% of complaints processed in accordance with the established GRM procedure and applicable standards.	Quarterly
Number of GBV/SEA-SH complaints referred to support services	Tracked, no numeric target	Quarterly

Indicator	Baseline / Target	Frequency
Complainant satisfaction with GRM process (survey)	Target: ≥ 80% satisfied	Annually
Number of community information campaigns conducted per work site	Target: ≥ 1 prior to works at each site	Per site

6. PROJECT STAKEHOLDER ENGAGEMENT PLANS

This Framework does not itself establish a fixed implementation schedule, since Projects are identified progressively over the Program's execution period. Instead, it requires that a project-specific SEP be prepared for each project, consistent with this Framework, once the project's scope, location, and affected population are known.

6.1 PREPARATION AND UPDATE OF PROJECT SEPS

For each project, MOHLR shall prepare a project SEP that, at minimum:

- Applies the stakeholder identification criteria and generic categories in Section 3 to produce a project-specific stakeholder mapping.
- Confirms the project's ESPS 1 categorization and the corresponding minimum consultation requirements per Section 4.
- Translates the timing triggers in Section 5.2.1 into a specific consultation and disclosure schedule aligned with the project's implementation timeline.
- Identifies any project-specific vulnerable groups, communication needs (e.g., languages), or access barriers.
- Where applicable, incorporates or is coordinated with stakeholder engagement requirements of the Resettlement Action Plan (RAP), including the resettlement stakeholder strategy, in accordance with Section 8.

During preparation of each project, activities will include updating the stakeholder mapping, disclosing draft environmental and social documentation, and conducting the required rounds of stakeholder consultation. Consultation outcomes will be documented and incorporated, where appropriate, into the final project documentation.

During pre-construction and construction, stakeholder engagement activities will focus on maintaining the Program Grievance Mechanism (Section 7), implementing community information campaigns prior to the commencement of works at each site, and conducting ongoing stakeholder engagement and communication.

Monitoring and reporting on SEP implementation will be undertaken throughout project implementation as part of the Program's environmental and social management and reporting processes. Each project SEP shall be reviewed periodically and updated as necessary to reflect project progress and stakeholder engagement needs.

6.2 RESOURCING

The Program shall ensure that adequate financial and human resources are made available for the implementation of this Framework, of each project SEP, and of the Grievance Mechanism. Resource requirements shall be assessed during the preparation phase of each project and incorporated into the corresponding annual planning and budgeting processes.

7. GRIEVANCE MECHANISM

The Program and its Projects will have a single, consistent feedback/claims management system that includes entry/reception, analysis, monitoring, and resolution. The Grievance Mechanism (GM) provides structured and systematic processes for all stakeholders across all Projects.

7.1 GM PRINCIPLES

- **Proportional:** The Mechanism will proportionally consider the level of risk and possible negative impacts on the affected areas.
- **Culturally appropriate:** The Mechanism will be designed to consider local customs relevant to each project area.
- **Accessible**: The Mechanism will be designed in a clear and simple way so that it is understandable to all people. There will be no cost associated with its use.
- **Anonymous**: a complaint may be raised anonymously. Anonymity is distinguished from confidentiality: for an anonymous complaint, the personal data (name, address) of the complainant are not recorded.
- **Confidential:** The Program will respect the confidentiality of the complaint. Information and details about a confidential report will only be shared internally, and only when necessary to report or coordinate with authorities.
- **Transparent:** The process and operation of the Mechanism will be transparent, predictable, and readily available for use by the population.
- **GBV-sensitive**: Gender-Based Violence (GBV) complaints are handled by a trained GBV focal point with access to referral pathways for health and psychosocial support services. A survivor-centered approach is required.

7.2 MANAGEMENT OF THE GM

The procedure begins with the presentation of a consultation, grievance, claim, complaint, and/or suggestion (orally or in writing) by any person linked to the actions of the Program or a specific project. The process ends with closure and agreement on the resolution by both parties. The process will be documented by means of a record (in physical and digitized form).

Complaints received at the level of individual Projects (via contractors, or departmental or municipal agencies) must be redirected to MOHLR for management and follow-up.

7.3 SCOPE

The GM applies and may be used by any person who expresses any type of claim, grievance, complaint, or query related to the activities of any project financed by the Program.

7.4 DISSEMINATION OF THE GRIEVANCE REDRESS MECHANISM

For the registration of claims, a dedicated email address will be maintained, as well as complaint mailboxes at each project's site(s). Information on these channels must be disseminated through the Program's various dissemination channels, which may include:

1. Signs at worksites: each project will include the contact details of the Executing Agency for receiving complaints (telephone, email, and website).

2. Formal and informal community meetings near project works, used both to communicate environmental and social matters and to disseminate the means to address concerns and claims.
3. MOHLR's social media channels (e.g., WhatsApp, Instagram, Facebook).
4. Other channels, to be agreed with each project's affected community.

The specific dissemination mechanisms for a given project shall be detailed in that project's SEP, based on information collected on the specific communities to be affected.

7.5 RECEIPT AND REGISTRATION OF GRIEVANCES

At minimum, the following channels shall be available for the reception of grievances and concerns, for every project:

- Letters submitted to MOHLR
- By phone
- Institutional email
- Online form on MOHLR's webpage: https://new.moh-ur.com/grievance
- Project worksites of contractor companies, which will have available a telephone line and/or email to address concerns

In the case of complaints related to Gender-Based Violence, in addition to the anonymous and confidential nature of the complaint, the GM must ensure that complainants can access health and psychological support services.

All grievances shall be handled through confidential procedures. Additionally, grievances and complaints involving Sexual, Exploitation and Abuse/ Sexual Harassment (SEAH/SH), Gender-Based Violence (GBV), or child protection concerns shall not include personally identifiable information, and they should be included a survivor approach.

Such complaints shall be assigned to unique confidential referral procedures, including appropriate referral to specialized and qualified service providers where required and with the survivor's consent. Access to confidential case records shall be strictly restricted to authorized MOHLR personnel on a need-to-know basis. Information shall be collected, stored, shared, and retained in accordance with applicable data protection requirements and the principles of confidentiality, informed consent, survivor-centeredness, and do-no.harm.

7.6 GRIEVANCE EVALUATION AND CATEGORIZATION

Grievances or concerns related to project works will be considered and responded to by the contractor company or MOHLR, as applicable. If a claim or complaint is rejected, the complainant will be informed of the decision and the reasons for it, in a manner that is relevant and understandable given their sociocultural characteristics.

Grievances and complaints received will be categorized as follows:

- **Not admissible:** grievances, complaints, or claims not directly related to a Program project, its activities, risks and impacts, contractors, subcontractors, or associated workforce.
- **Low priority:** requests for information, clarification, or minor concerns that do not involve actual or potential adverse impacts and can be readily addressed.

- **Medium priority:** grievances related to project activities that may result in limited or localized impacts, including nuisance issues, traffic, noise, dust, access restrictions, contractor conduct, or minor environmental or social concerns.
- **High priority:** grievances involving actual or potential significant impacts or risks on workers, communities, the environment, or human rights, including serious health and safety incidents, allegations of discrimination, harassment, GBV/SEA/SH, or other significant adverse effects.

Grievances related to labor and working conditions are not covered under this Program-wide GRM. Such grievances will be addressed through the dedicated worker grievance mechanism established under the Project's Labor Management Plan (LMP), which sets out the applicable procedures for receiving, reviewing, and addressing worker grievances.

Upon receipt of a complaint, the contractor's social manager for the unit in which the complaint is registered shall acknowledge receipt to the complaint within three (3) working days. The acknowledgement shall, to the extent possible, confirm the registration of the complaint, provide the complainant with a reference number, and explain the next steps and expected timeframe for its review. Where the complaint is submitted anonymously, the acknowledgement requirement shall apply to the extent that a means of communication with the complainant is available.

The contractor's social manager shall conduct an initial review of the complaint and the documentation provided by the claimant within the applicable response timeframe established in Section 7.6. Where additional information is required, the complainant shall be contacted as soon as reasonably practicable to request the information necessary to assess the complaint. Any time reasonably required from the complainant to provide such information shall not be counted against the applicable response timeframe.

Once the complaint is completed and reviewed, the complaints shall be assigned the appropriate priority category and handled in accordance with the response deadlines established in Section 7.6. Project staff shall maintain a record of the complaint, including a summary, date of receipt, priority category, person responsible for its handling, actions taken, and status. The record shall be updated periodically until the complaint is resolved and formally closed.

7.7 GRIEVANCE CLOSURE AND MONITORING

The resolution of grievances or claims will be conducted through two instances:

1. Internal: the reception of grievances or claims and resolution of conflicts is the responsibility of MOHLR and will be referred to the competent agency according to the complaint/claim.
2. Mediation: cases of claims and conflicts not resolved in the first instance will be addressed under a mediation mechanism. The person responsible for this instance must have sufficient authority to mediate the resolution of claims and conflicts, and sufficient independence to be credible to the parties.

7.8 CONFLICT RESOLUTION

Where there is no agreement between MOHLR and a complainant, because a concern was rejected or there is no agreement on the solution to be implemented, reasonable efforts to reach a mutually acceptable resolution between the parties shall continue to be pursued. . This may include, among others, the participation of technical third parties, dialogue tables, mediation, or conciliation.

MOHLR shall ensure that grievance handling and dispute resolution are conducted in an appropriate, transparent and comprehensive manner. The grievance mechanism does not prevent or restrict complaints from seeking other avenues of redress available under applicable law. If grievance or claim cannot be resolved through the project's grievance mechanism, or falls outside its scope, the interested party may pursue the matter through the applicable judicial or administrative procedures.

In addition, PAPs and communities may also submit complaints directly to the IDB through its general complaint channel, available at https://www.iadb.org/en/who-we-are/file-complaint. PAPs and communities may also access the IDB Group's Independent Consultation and Investigation Mechanism (MICI: https://www.iadb.org/mici/), an independent accountability mechanism that addresses environmental and social complaints from individuals and communities who believe they have been or may be adversely affected by an IDB Group-financed operation. MICI provides a channel through which complainants may raise concerns regarding the IDB Group's compliance with its environmental and social policies and standards. MICI is independent of the Bank's management and project teams and is independent of the project-level grievance mechanism.

The project and MOHLR shall not require complainants to submit their grievances directly to the IDB or to MICI as a means of resolving or closing a complaint under the project's grievance mechanism.

7.9 DEADLINES FOR RESPONSE TO GRIEVANCES

All grievances must be registered, and the proposed solution communicated to the interested party, within the following deadlines: low priority within a maximum of 30 calendar days; medium priority within 15 calendar days; and high priority within a maximum of 7 calendar days. These deadlines may be adjusted by MOHLR.

In all cases, a grievance response report will be drawn up and signed by the person who filed the grievance, in accordance with the handling of the case. MOHLR will systematize the grievance records and the corresponding minutes of attention. Information provided will be relevant and understandable according to the sociocultural characteristics of the person consulting. MOHLR will oversee the process, detect deviations, and ensure resolution.

7.10 MONITORING AND DOCUMENTATION

MOHLR will be responsible for maintaining an up-to-date database with all documentation and information related to grievances submitted, for following up on grievance processing in coordination with the areas involved, and for facilitating participation in the process as appropriate.

A grievance tracking form will be completed for each case. Once an agreement is reached, follow-up activities will be conducted to verify that agreed corrective or resolution measures have been effectively implemented. The grievance registry shall provide evidence that all actions and procedures have been carried out in accordance with the requirements established in this mechanism. At minimum, the grievance register shall include:

- Unique grievance identification number
- Date on which the complaint was received and registered
- Description of the grievance
- Whether anonymity was requested by the complainant
- Whether the grievance belongs to or identifies as a vulnerable person or group

- Person responsible for the grievance
- Proposed resolution measures and actions taken (where applicable)
- Grievance status
- Date the response was communicated to the complainant
- Date for grievance closure

As part of the Semi-annual Compliance Reports, MOHLR will report to the IDB on the implementation and effectiveness of the GM, including the number, nature, status, follow-up, and resolution of grievances received across the Program's Projects.

Grievances closed to the satisfaction of the complainant may be subject to follow-up monitoring to verify that agreed corrective actions have been effectively implemented. The duration and frequency of follow-up shall be commensurate with the priority and complexity of the grievance: high-priority grievances may require monitoring for up to six (6) months after closure, while low- and medium-priority grievances may be subject to shorter follow-up periods, as appropriate. The GM will be available throughout the entire execution of the Program.

8. RESETTLEMENT CONSULTATION AND PARTICIPATION STRATEGY GUIDELINES

Should land acquisition and/or physical or economic displacement be confirmed during the preparation of a project, MOHLR shall prepare a Resettlement Action Plan (RAP), as appropriate, consistent with this framework. The stakeholder engagement strategy for resettlement shall form part of the RAP and shall be developed and implemented in accordance with the applicable requirements set out in these guidelines.

The strategy shall complement this Framework by defining the consultation and engagement approach for Project Affected Persons (PAPs) throughout the resettlement process for that project. At minimum, the strategy should address the following elements:

- **Purpose and scope:** objective, scope, and relationship with this Framework and the applicable Resettlement Policy and RAP.
- **Guiding principles:** meaningful consultation, informed participation, transparency, inclusion, gender-responsive engagement, accessibility, confidentiality, good-faith consultation, documentation, and adaptive management.
- **Stakeholder identification** and mapping: identification of PAPs and other stakeholders requiring targeted engagement, including landowners, tenants, informal occupants, affected businesses (formal or informal), vulnerable households, government agencies, NGOs, and other relevant stakeholders.
- **Engagement throughout the resettlement process:** consultation objectives, methods, and expected outcomes for each stage of the resettlement process, including screening, census, asset inventory, valuation, eligibility determination, RAP preparation, compensation, relocation, livelihood restoration (Livelihood Restoration Management Plan -- LRMP), monitoring, and completion.
- **Informed and participative process planning:** consultation methods for the RAP or LRMP, responsible parties, participants, gender and vulnerability considerations (including differentiated engagement measures for vulnerable households), timing, documentation requirements, and records to be maintained, as well as disclosure materials, communication channels, and arrangements for accessible and culturally appropriate information.
- **Resettlement-specific grievance process:** procedure for managing grievances related to eligibility, valuation, compensation, relocation, livelihood restoration, and other resettlement-related matters, in coordination with the Program Grievance Mechanism (Section 7).
- **Monitoring and reporting:** indicators to monitor stakeholder engagement and consultation activities, including gender and vulnerable-groups approaches, during resettlement development and implementation.
- **Roles, responsibilities, and schedule:** institutional responsibilities and an indicative stakeholder engagement schedule aligned with the development and implementation of the RAP/LRMP.

9. CONSULTATION REPORT GUIDELINES

Following each formal public consultation event held for a project, a Consultation Report will be prepared containing the main concerns raised (during the event and in any prior or subsequent written submissions), indicating how they were addressed at the time or, where appropriate, what responses were subsequently prepared and how they were communicated to stakeholders and the public.

Although consultation is not legally binding, proposals received should be evaluated and an explanation of their relevance (or non-relevance) included in the report. Where relevant, the report will result in proposals for changes to: (i) project design; (ii) mitigation measures; and (iii) the mechanism for handling complaints and grievances.

The Consultation Report shall be prepared based on information gathered at the public consultation and shall include the invitation process, links to the webpages where the project and its environmental and social documentation have been published, a description of the call mechanism used, the list of participants, photographs or screenshots of the process, informative banners, publications made in local media, and other dissemination materials used.

At minimum, the Consultation Report shall include the following:

1. Participation strategy: description of how the consultation process was developed (prior coordination with authorities and key stakeholders, methodology, selection of topics to be addressed, etc.).
2. Stakeholder mapping (groups, institutions, or persons invited) and selection criteria applied; invitation mechanism.
3. Dissemination: invitations issued and publication of the event on institutional websites and media.
4. Website used for disclosure of information.
5. Analysis of the people who participated compared to those invited.
6. Gender-disaggregated data of participants.
7. Materials disclosed during the consultation process.
8. Questions and answers (suggestions, claims, or questions made by stakeholders, and how they were addressed).
9. Indication of how suggestions and/or complaints received were, or will be, incorporated into project design; any formal agreements reached with consulted persons.
10. Main conclusions on positive or negative perception of the project by participants, including agreements reached.
11. Feedback collected from consultations and included in the final version of the ESA and ESMP.
12. Annex: copies of presentations made (must ensure impacts and mitigation measures of the specific project were presented).
13. Annex: sample copy of invitation letters sent.
14. Annex: copies of RSVPs to invitation letters.
15. Annex: list of invited persons.

16. Annex: list of participants (interested/affected persons, governmental, institutional, and general public).
17. Annex: photographs of the activity / screenshots of the online event.

The Consultation Report must be published on MOHLR's institutional website, as communicated to persons participating in the consultation event.

9.1 CONSULTATION REPORT -- STRUCTURE AND TEMPLATE

This section provides the structure to be used for the Consultation Report following each formal public consultation event. The report shall be prepared by MOHLR (or its designated consultant) and published on the MOHLR institutional website. The template structure is provided in Annex B.

Annex A.1 - Project Stakeholder Mapping Template

Each project SEP shall complete the following table, based on the criteria and generic categories in Section 3, using stakeholders specific to that project.

Type	Stakeholder	Relationship to Project	Interest Level	Influence Level	Engagement Stage
[Add additional rows as needed]					

Annex A.2 - Consultation Report Template

Cover and Identification

Field	Detail
Operation Name	Bahamas Sustainable Housing Opportunities for Urban Transformation
Operation Number	BH-L1064
Executing Agency	Ministry of Housing and Land Reform (MOHLR)
Project	[Project name and location]
Consultation Date	[To be completed]
Consultation Location	[To be completed]
Format	[In-person / Hybrid -- specify]
Report Prepared By	[Name, Organization]
Report Date	[Date]
Report Version	[V1.0 -- Final]

Section 1 -- Executive Summary

Provide a 1-2-page summary of: the consultation process, number and profile of participants, main concerns raised, key agreements reached, and how feedback will be incorporated into the project. This section should be accessible to non-technical readers.

Section 2 -- Participation Strategy

Describe how the consultation process was planned and conducted, including: prior coordination with authorities and key stakeholders (dates, contacts); methodology used (plenary presentation, open Q&A, focus groups, etc.); selection criteria for topics and stakeholders invited; accessibility measures taken (language, disability access, childcare, etc.); and special measures for vulnerable groups.

Section 3 -- Stakeholder Mapping and Invitation Process

Document the final list of stakeholders invited (by type/category) and selection criteria applied; the invitation mechanism used (email, letter, phone, media); the date invitations were issued (must be ≥ 14 days before the event); and the number of invitees who confirmed attendance (RSVPs received).

Stakeholder Type	Total Invited	RSVPs Received	Invitation Method
Institutional stakeholders			
Civil society / community organizations			

Stakeholder Type	Total Invited	RSVPs Received	Invitation Method
Directly affected residents			
Vulnerable groups (targeted)			
General public (open invitation)	N/A	N/A	Media / website / social media
TOTAL			

Section 4 -- Information Disclosure

Confirm and document: URL(s) of the MOHLR project webpage where documents were published; list of documents published, date of publication, and date of last update; date documents were made available (must be ≥ 14 days before the event); and languages in which documents were available.

Section 5 -- Participants: Analysis and Gender Disaggregation

Provide a disaggregated analysis of actual event participation:

Participant Category	Total	Women	Men	Gender Not Specified	%
Institutional / Government					
Civil society / NGOs					
Directly affected residents					
General public					
Virtual participants					
TOTAL					

Include qualitative analysis.

Section 6 -- Materials Disclosed During the Event

List and describe all materials presented or distributed during the event:

Material	Description / Format	Language(s)	Distributed To (Audience)
Presentation slides	PowerPoint / PDF	English	All participants
Non-Technical Project Summary	Printed brochure (1 page)	English / [other]	All participants
GRM Flyer	Printed	English / [other]	All participants

Material	Description / Format	Language(s)	Distributed To (Audience)
[Add additional rows as needed]			

Section 7 -- Questions, Answers, Concerns, and Commitments

Document all questions, comments, concerns, and suggestions raised during the event (and in any prior or subsequent written submissions), and the responses provided:

#	Raised By (category, anonymous if requested)	Question / Concern / Suggestion	Response / Commitment Made	Responsible Party and Deadline	Status
1					
2					
3					
[Add rows as needed]					

Section 8 -- Incorporation of Feedback into Project Design and ESMP

Describe specifically how stakeholder feedback from this consultation (and any prior processes) has been or will be incorporated into: (i) project design (layout, schedule, access routes, community facilities, etc.); (ii) ESMP mitigation measures (new or modified); (iii) the GRM (improvements to channels, protocols, staffing); and (iv) the project SEP (adjustments to engagement activities, frequency, target groups).

Feedback / Concern	Proposed Change or Response Measure	Document Modified (ESMP / SEP / Design / N/A)

Section 9 -- Perception Analysis and Main Conclusions

Provide a qualitative assessment of stakeholder perceptions based on the consultation, including: overall perception of the project (favorable / mixed / unfavorable) with justification; main concerns and their relative frequency; level of support observed (with nuance by stakeholder group); key messages communicated by community members; notable agreements reached with consulted persons; and identified risks for project implementation arising from stakeholder feedback.

Section 10 -- Next Steps and Follow-up Commitments

List the follow-up actions committed to during the consultation, with the party responsible and timeline:

#	Action Committed	Responsible	Deadline	Status
1	Publish final Consultation Report on MOHLR website	MOHLR / SEP Coordinator	Within 30 days of event	Pending
2	Update ESMP with agreed mitigation measures	MOHLR / Consultant	[TBD]	Pending
3	Activate GRM channels before construction begins	MOHLR / GRM Officer	Before works start	Pending
4	[Add additional follow-up commitments as appropriate]			

Section 11 -- Annexes

Include, as applicable, the documents generated during the consultation process. The following table provides illustrative examples of supporting documentation:

#	Annex Description	Format	Status
A	Copies of all presentations made during the event (must include E&S impacts and mitigation measures)	PDF / PPT	[ ]
B	Sample copy of invitation letters sent	PDF / scan	[ ]
C	Copies of RSVPs / confirmations received	Email screenshots / PDF	[ ]
D	Full list of invited stakeholders (names, organizations, categories)	Table (Word/Excel)	[ ]
E	Signed attendance register from the event (with gender column; anonymized if requested)	Scan or Excel	[ ]
F	Photographs of the in-person event, with prior authorization	JPG / PNG	[ ]
G	Screenshots or recording link for virtual/hybrid component (if applicable)	Link / PDF	[ ]
H	Copies of media publications / social media posts announcing the event	Screenshots / print	[ ]
I	Written questions or submissions received before/during/after the event	PDF / scan	[ ]
J	Evidence of document publication on MOHLR website (screenshots with URL and date)	Screenshots / PDF	[ ]
K	Informational banners or posters used	JPG / PDF	[ ]

Annex A.3 – Program Grievance Submission Form

Minor Home Repairs Program

Sustainable Housing Opportunities for Urban Transformation (BH-L1064)

INSTRUCTIONS

This form may be completed by the complainant or by MOHLR staff receiving the grievance. Anonymous grievances will be accepted.

Section 1 – Complainant Information

Name (optional)	
Address	
Telephone	
Email	
Preferred method of communication	☐ Telephone ☐ Email ☐ Letter ☐ In Person
Keep identity confidential?	☐ Yes ☐ No
Anonymous submission?	☐ Yes ☐ No

Section 2 – Relationship to the Program

☐ Applicant
☐ Beneficiary/Homeowner
☐ Neighboring Resident
☐ Contractor/Subcontractor
☐ Project Worker
☐ Government Agency
☐ Community Organization
☐ Other: _____

Section 3 – Grievance Information

Date of incident (if applicable): _____

Location (property/worksite): _____

Describe the grievance or concern:

_____

_____

_____

Section 4 – Desired Resolution (Optional)

How would you like this matter to be resolved?

_____

_____

Section 5 – Supporting Information

Previously reported? ☐ Yes ☐ No
If yes, to whom? _____
Supporting documents attached? ☐ Yes ☐ No
☐ Photographs ☐ Letter ☐ Other: _____

Section 6 – For MOHLR Use Only

Reference Number	
Date Received	
Received By	
Complaint Category	☐ Eligibility ☐ Construction Quality ☐ Contractor Conduct ☐ Noise/Dust ☐ Access ☐ Property Damage ☐ Health & Safety ☐ Environmental ☐ SEA/SH (Confidential) ☐ Other
Priority	☐ Low ☐ Medium ☐ High
Acknowledgement Sent	☐ Yes ☐ No
Remarks	

Annex A.4 - Program Grievance Register

Minor Home Repairs Program

Sustainable Housing Opportunities for Urban Transformation (BH-L1064)

Ref. No.	Date Received	Complainant/ Anonymous	Stakeholder Category	Grievance Category	Property/ Location	Assigned To	Priority	Action Taken	Status	Date Closed	Remarks

A. GRIEVANCE CATEGORIES

- Eligibility/Application
- Construction Quality
- Contractor Conduct
- Property Damage
- Noise/Dust
- Access Restrictions
- Community Health & Safety
- Environmental
- Information Request
- Suggestion
- SEA/SH (Confidential)
- Other

B. STATUS DEFINITIONS

Status	Description
Open	Complaint received and under review
Under Investigation	Investigation in progress
Resolved	Corrective action completed and communicated
Closed	Resolution accepted or no further action required

C. CONFIDENTIAL COMPLAINTS

Complaints involving SEA/SH, GBV or child protection shall not include personally identifiable information in the grievance register. These complaints shall be assigned a confidential reference number and managed through the Program's confidential referral procedures. Access to confidential records shall be restricted to authorized MOHLR personnel.

ANNEX O

Operations & Maintenance Guidance Document

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

1 OPERATIONS AND MAINTENANCE FOR CLIMATE-RESILIENT HOUSING ASSETS

1.1 INTRODUCTION

An Operations and Maintenance (O&M) Plan is required for every housing development financed under the Program, as identified in Part H of the Project Environmental and Social Screening Form (Annex A). This Annex is the corresponding Guidance Document: it is not the O&M Plan itself, but sets out the minimum elements – an asset inventory, inspection and preventive maintenance programs, hurricane and post-disaster procedures, corrective maintenance, asset replacement planning, record keeping, and capacity building – that MOHLR, or the property management entity responsible for a given project, shall address when preparing the project-specific O&M Plan, proportionate to the nature, scale, and asset composition identified for that project through screening.PURPOSE

To ensure the long-term resilience, safety, functionality, and sustainability of housing developments and associated infrastructure throughout their operational life.

1.2 ASSETS INVENTORY

Each project shall prepare and maintain an inventory of all buildings, roads, drainage systems, utilities, community facilities, and other infrastructure assets. The inventory shall identify critical infrastructure and climate-sensitive assets.

1.3 ROLES AND RESPONSIBILITIES

The O&M Plan shall define responsibilities of the MOHLR and Communities, homeowners, homeowner associations, property management entities, utility providers, and maintenance contractors.

1.4 INSPECTION PROGRAM

The O&M Plan shall establish periodic inspections for roofs, building envelopes, drainage systems, roads, electrical systems, water supply and wastewater infrastructure, hurricane protection systems, and community facilities. Inspection frequencies shall be based on engineering standards, manufacturer recommendations, and local environmental conditions.

1.5 PREVENTIVE MAINTENANCE PROGRAM

Preventive maintenance procedures shall be established to preserve the condition and performance of assets and reduce the likelihood of failures during extreme weather events.

1.6 HURRICANE AND EXTREME WEATHER PREPAREDNESS

The O&M Plan shall include procedures for pre-hurricane inspections, securing buildings and infrastructure, protecting critical equipment, emergency communications, and rapid post-event assessments.

1.7 POST-DISASTER ASSESSMENT AND RECOVERY

The O&M Plan shall establish procedures for safety inspections following hurricanes, flooding, and other extreme events; damage classification; temporary stabilization measures; and reconstruction and restoration activities.

1.8 CORRECTIVE MAINTENANCE AND REPAIRS

The O&M Plan shall establish procedures for identifying, documenting, prioritizing, and correcting deficiencies identified during routine inspections or following extreme weather events.

1.9 ASSET REPLACEMENT PLANNING

The O&M Plan shall establish criteria for asset replacement and identify indicative service lives for major infrastructure components to support long-term budgeting and asset management.

1.10 RECORD KEEPING

Records shall be maintained for inspections, maintenance activities, repairs, replacements, storm damage assessments, warranties, and equipment manuals.

1.11 CAPACITY BUILDING

Homeowners, homeowner associations, and property managers shall receive training on maintenance requirements, hurricane preparedness, and emergency response procedures.

1.12 ESMF REQUIREMENT

As a condition of project completion and prior to occupancy, each housing development financed under the Program shall prepare and implement an Operations and Maintenance Plan consistent with the requirements established in this ESMF.

Annex P

Contractor Environmental and Social Requirements Framework

Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064)

Environmental and Social Management Framework (ESMF)

1 INTRODUCTION AND SCOPE

1.1 INTRODUCTION

This Annex establishes mandatory environmental, social, labor, occupational health and safety (ESHS) requirements applicable to all contractors, subcontractors and suppliers engaged under BH-L1064. These requirements shall be incorporated into procurement documents and contracts and are contractually binding.

1.2 SCOPE

The scope of this Annex is set out in seven sub-annexes, which provide the standard templates, checklists, and forms that MOHLR and contractors shall use to implement these requirements:

- Annex P-1 Standard E&S Contract Clauses
- Annex P-2 Contractor Prequalification Form
- Annex P-3 Mobilization Checklist
- Annex P-4 Monthly ESHS Report
- Annex P-5 Contractor E&S Inspection Checklist
- Annex P-6 Corrective Action Register
- Annex P-7 Contractor E&S Performance Evaluation

2 HIERARCHY OF E&S DOCUMENTS

Contractors shall comply with the following hierarchy:

ESMF → Project-specific ESMP → This Annex → Contractor-specific Environmental and Social Management Plans (CESMPs) and other contractor specific procedures.

3 INTEGRATION INTO PROCUREMENT

MOHLR shall incorporate ESHS requirements into all procurement documents, contracts, purchase orders and work orders, as required by the loan agreement. The contractor shall ensure that the equivalent requirements are incorporated into all subcontract agreements.

Annex P-1 - Standard Environmental and Social Contract Clauses BH-L1064

The following clauses shall be incorporated, as applicable, into bidding documents, requests for quotations, contracts, purchase orders and work orders issued under the Bahamas Sustainable Housing Opportunities for Urban Transformation Program (BH-L1064). These clauses establish the minimum environmental, social, labor, health and safety (ESHS) obligations applicable to contractors and subcontractors.

1 COMPLIANCE WITH ENVIRONMENTAL AND SOCIAL REQUIREMENTS

The Contractor shall comply with the Environmental and Social Management Framework (ESMF), the applicable Environmental and Social Management Plan (ESMP), all relevant ESMF annexes, applicable permits and approvals, and all applicable laws and regulations of The Bahamas.

1.1 CONTRACTOR ENVIRONMENTAL AND SOCIAL MANAGEMENT

Prior to mobilization, the Contractor shall prepare and implement all contractor-specific environmental and social management plans required by the ESMP, including CESMPs and any trade-specific procedures, for review and acceptance by MOHLR.

1.2 OCCUPATIONAL HEALTH AND SAFETY

The Contractor shall provide a safe and healthy workplace, implement appropriate occupational health and safety measures, provide personal protective equipment at no cost to workers, conduct inductions and toolbox talks, and investigate all incidents.

1.3 LABOUR AND WORKING CONDITIONS

The Contractor shall comply with the Program Labor Management Procedures, prohibit child labor, forced labor and discrimination, respect workers' rights, maintain a worker grievance mechanism, and comply with applicable labor legislation.

1.4 WORKER CODE OF CONDUCT

All Contractor and subcontractor personnel shall sign and comply with the Program Code of Conduct prior to commencing work. Violations may result in disciplinary action or removal from the Project.

1.5 COMMUNITY HEALTH AND SAFETY

The Contractor shall minimize impacts on neighboring communities through appropriate traffic management, dust and noise control, housekeeping, public safety measures, advance notification of disruptive activities, and implementation of the Program Grievance Mechanism.

1.6 ENVIRONMENTAL PROTECTION

The Contractor shall prevent pollution, manage wastes appropriately, protect natural resources, prevent spills, and restore disturbed areas upon completion of the works.

1.7 HAZARDOUS MATERIALS AND CHANCE FINDS

The Contractor shall immediately stop work and notify MOHLR upon discovery of suspected hazardous materials, archaeological resources, cultural heritage, or human remains, and shall follow the applicable ESMF procedures.

1.8 INCIDENT NOTIFICATION

The Contractor shall notify MOHLR immediately of any fatality, serious injury, significant environmental incident, community protest, allegation of SEA/SH, or other material environmental or social incident, and cooperate in all investigations.

1.9 MONITORING AND REPORTING

The Contractor shall maintain records demonstrating compliance with the contract and submit periodic ESHS reports in the format and frequency established by MOHLR.

1.10 SUBCONTRACTORS

The Contractor shall ensure that all subcontractors are contractually bound by the same ESHS obligations contained in the principal contract and shall remain responsible for subcontractor performance.

1.11 ACCESS AND AUDITS

The Contractor shall provide MOHLR, the Inter-American Development Bank (IDB), and authorized regulatory agencies with reasonable access to worksites, personnel, documents, and records for inspections and audits.

1.12 NON-COMPLIANCE AND REMEDIES

Failure to comply with these ESHS requirements may result in corrective action requests, suspension of works, withholding of payments, removal of personnel, termination of the contract, or other remedies available under the contract.

1.13 CONTRACTOR ACKNOWLEDGEMENT

The Contractor acknowledges that compliance with these Environmental and Social Contract Clauses is a material condition of the Contract and agrees to implement them throughout the duration of the Project.

Contractor	
Authorized Representative	
Signature	
Date	

Annex P-2 - Contractor Prequalification Form BH-L1064

This form shall be completed by MOHLR during the prequalification and evaluation of contractors. It provides a standardized assessment of a contractor's technical, financial, environmental, social, labor, health and safety (ESHS) capacity prior to invitation to bid or contract award. This form is not itself incorporated into the bidding documents; rather, it is administered by MOHLR during the prequalification stage, and a "Pass" rating shall be a precondition for a contractor's inclusion on the shortlist of eligible bidders invited to submit a bid, consistent with the Integration into Procurement requirements set out in the main body of this Annex

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A. COMPANY INFORMATION

Requirement	Evidence Submitted	Pass / Fail / Comments
Legal name		
Business registration		
Company address		
Authorized representative		
Years in operation		
Number of employees		

B. TECHNICAL CAPACITY

Requirement	Evidence Submitted	Pass / Fail / Comments
Experience with similar projects		
References from last 5 years		
Qualified project manager		
Qualified ESHS personnel		
Availability of equipment		
Quality management system		

C. ENVIRONMENTAL AND SOCIAL CAPACITY

Requirement	Evidence Submitted	Pass / Fail / Comments
Environmental policy		
Occupational Health and Safety policy		
Labour management procedures		
Worker Code of Conduct		
Incident reporting procedure		
Emergency response arrangements		

Requirement	Evidence Submitted	Pass / Fail / Comments
Community engagement experience		

D. LEGAL AND FINANCIAL COMPLIANCE

Requirement	Evidence Submitted	Pass / Fail / Comments
Valid business licenses		
Insurance certificates		
Financial statements		
Pending litigation		
Regulatory violations in last five years		
Tax compliance		

E. PAST PERFORMANCE

Requirement	Evidence Submitted	Pass / Fail / Comments
Contract completion record		
Environmental performance		
Health and safety performance		
Labor compliance		
Community complaints history		
Previous MDB-funded projects		

F. OVERALL RISK RATING

Technical Capacity	
ESHS Capacity	
Financial Capacity	
Overall Risk Rating (Low/Moderate/High)	
Recommendation (Prequalify/Conditional/Reject)	

G. EVALUATION TEAM

Evaluator	
Position	
Signature	
Date	

Guidance Notes

Prequalification should consider not only technical capability and cost, but also the contractor's demonstrated capacity to implement environmental and social requirements. Contractors with poor ESHS performance, unresolved regulatory violations, repeated serious incidents, or inadequate management systems should not be prequalified until deficiencies have been satisfactorily addressed.

Annex P-3 - Contractor Mobilization Checklist BH-L1064

This checklist shall be completed jointly by the Contractor and MOHLR before the Notice to Proceed is issued. Its purpose is to verify that all environmental, social, labor, health and safety (ESHS) requirements have been met prior to mobilization.

1 PROJECT INFORMATION

Project	
Contract No.	
Contractor	
Location	
Mobilization Date	
MOHLR Representative	

A. CONTRACT DOCUMENTATION

Requirement	Yes	No	Comments
Contract signed			
Performance security provided (if applicable)			
Insurance certificates submitted			
Environmental and Social clauses included in contract			

B. ESHS DOCUMENTATION

Requirement	Yes	No	Comments
CESMP approved (if required)			
Occupational Health and Safety Plan approved			
Emergency Preparedness and Response Plan available			
Waste Management Plan available			
Traffic Management Plan approved (if applicable)			

Requirement	Yes	No	Comments
Hazardous Materials Procedure available			

C. PERSONNEL AND TRAINING

Requirement	Yes	No	Comments
Project Manager appointed			
ESHS Officer appointed			
Workers inducted			
Workers signed Code of Conduct			
First aid personnel identified			

D. PERMITS AND APPROVALS

Requirement	Yes	No	Comments
Required permits obtained			
Utility clearances obtained			
Site access authorization received			

E. SITE READINESS

Requirement	Yes	No	Comments
Site boundaries established			
Safety signage installed			
PPE available			
First aid kits available			
Emergency contacts displayed			

Requirement	Yes	No	Comments
Fire extinguishers available			
Spill kits available			
Sanitary facilities provided			

F. COMMUNITY READINESS

Requirement	Yes	No	Comments
Stakeholders notified (where required)			
Grievance mechanism displayed			
Community contact person identified			
Traffic notifications issued (if required)			

G. ENVIRONMENTAL READINESS

Requirement	Yes	No	Comments
Waste collection arrangements confirmed			
Protected areas identified			
Sensitive receptors identified			
Erosion and sediment controls installed (if applicable)			

1.1 MOBILIZATION DECISION

Approved to Mobilize (Yes/No)	
Outstanding Actions	
MOHLR Signature	

Date	

Instructions

Mobilization shall not commence until all critical ESHS requirements have been verified by MOHLR. Items marked 'No' shall be addressed through a corrective action plan before the Notice to Proceed is issued.

Annex P-4 - Monthly Contractor Environmental and Social Performance Report BH-L1064

This report shall be submitted by the Principal Contractor to MOHLR on a monthly basis. It summarizes environmental, social, labor, occupational health and safety (ESHS) performance during the reporting period.

1 PROJECT INFORMATION

Project	
Contract Number	
Contractor	
Reporting Period	
Site Manager	
ESHS Officer	
Date Submitted	
Prepared By	

1.1 WORKFORCE SUMMARY

Indicator	Value
Total workforce	
Female workers	
Subcontractor workers	
Hours worked	
New workers inducted	
Toolbox talks conducted	
Training sessions completed	

1.2 PROGRESS OF WORKS

Provide a summary of construction progress, key activities completed, activities planned for the next reporting period, and any significant changes to the works.

1.3 ENVIRONMENTAL AND SOCIAL PERFORMANCE

Aspect	Status	Comments
Waste management		
Dust control		
Noise control		
Spill prevention		

Aspect	Status	Comments
Hazardous materials		
Community health and safety		
Traffic management		
Stakeholder engagement		
Labor compliance		
Code of Conduct implementation		

1.4 INCIDENTS AND NEAR MISSES

Date	Type	Description	Corrective Action	Status

1.5 GRIEVANCES

Date	Source	Issue	Resolution	Status

1.6 INSPECTIONS AND AUDITS

Inspection	Completed	Findings	Follow-up
Daily inspections			
Weekly inspections			
Joint inspections			
Environmental inspections			
OHS inspections			
Internal audits			

1.7 CORRECTIVE ACTIONS

Action	Responsible	Due Date	Status	Verified

1.8 KEY PERFORMANCE INDICATORS

Indicator	Target	Actual
Workers inducted	100%	
Code of Conduct signed	100%	
Monthly inspections completed	100%	
Serious incidents reported within 24 hours	100%	
Corrective actions closed on time	>95%	
Repeat major non-conformances	0	

1.9 PHOTOGRAPHIC RECORD

Attach representative photographs showing work progress, environmental controls, housekeeping, community protection measures, and any notable events.

1.10 CONTRACTOR DECLARATION

Prepared by	
Reviewed by	
Signature	
Date	

Annex P-5 - Contractor Environmental and Social Inspection Checklist BH-L1064

This checklist shall be used by MOHLR, the Supervising Engineer, or the Contractor's ESHS Officer during routine site inspections to verify compliance with the ESMF, the project ESMP, and contractual environmental, social, labor, health and safety (ESHS) requirements.

1 INSPECTION INFORMATION

Project	
Contract No.	
Contractor	
Location	
Inspection Date	
Inspector	
Weather	
Type of Inspection	

A. DOCUMENTATION

Inspection Item	Compliant	Non-Compliant	N/A	Comments
Workers' contracts (with worker GRM and code of conduct information)				
Required permits available on site				
Approved ESMP/CESMP available				
Worker induction records current				
Incident register maintained				
Grievance register maintained				

B. OCCUPATIONAL HEALTH AND SAFETY

Inspection Item	Compliant	Non-Compliant	N/A	Comments
Workers wearing PPE	☐	☐	☐	

Inspection Item	Compliant	Non-Compliant	N/A	Comments
Toolbox talk conducted	☐	☐	☐	
First aid kits available	☐	☐	☐	
Emergency contacts displayed	☐	☐	☐	
Fire extinguishers inspected	☐	☐	☐	
Safe access and housekeeping	☐	☐	☐	
Electrical safety measures in place	☐	☐	☐	
Fall protection implemented (if applicable)	☐	☐	☐	
Follow up documentation on medical care for injuries and return to work assessment	☐	☐	☐	

C. ENVIRONMENTAL MANAGEMENT

Inspection Item	Compliant	Non-Compliant	N/A	Comments
Waste properly segregated	☐	☐	☐	
Waste containers labelled	☐	☐	☐	
No evidence of uncontrolled dumping	☐	☐	☐	
Dust adequately controlled	☐	☐	☐	
Noise minimized	☐	☐	☐	

Inspection Item	Compliant	Non-Compliant	N/A	Comments
No spills or leaks	☐	☐	☐	
Spill kits available	☐	☐	☐	
Hazardous materials properly stored	☐	☐	☐	
Drainage protected	☐	☐	☐	

D. COMMUNITY HEALTH AND SAFETY

Inspection Item	Compliant	Non-Compliant	N/A	Comments
Warning signs installed				
Public access controlled				
Traffic management implemented				
Community notifications completed				
Safe pedestrian access maintained				
No unnecessary nuisance to neighbors				

E. LABOR AND WORKING CONDITIONS

Inspection Item	Compliant	Non-Compliant	N/A	Comments
Code of Conduct signed				
No child labor observed				
No forced labor indicators				

Inspection Item	Compliant	Non-Compliant	N/A	Comments
Worker grievance mechanism communicated				
Sanitary facilities adequate				
Drinking water available				

F. BIODIVERSITY AND CULTURAL HERITAGE

Inspection Item	Compliant	Non-Compliant	N/A	Comments
Vegetation protected				
No unauthorized clearing				
Chance finds procedure understood				
No impacts to cultural heritage observed				

G. CORRECTIVE ACTIONS

Inspection Item	Compliant	Non-Compliant	N/A	Comments
Previous corrective actions closed				
Outstanding issues addressed				

1.1 SUMMARY OF FINDINGS

Strengths Observed:

Non-Conformances:

Recommended Corrective Actions:

1.2 OVERALL COMPLIANCE RATING

Rating (Excellent/Good/Fair/Poor)	
Follow-up Inspection Required (Yes/No)	
Inspector Signature	
Date	

Annex P-6 - Corrective Action Register BH-L1064

This register shall be used to document environmental, social; labor, occupational health and safety (ESHS) non-conformances identified during inspections, audits, incident investigations, or grievance investigations. It shall be maintained by the Contractor and reviewed by MOHLR until all corrective actions have been verified and closed.

Instructions

Each non-conformance shall be assigned a unique reference number. Corrective actions should be proportionate to the significance of the finding and tracked until satisfactory close-out. High-risk findings should be addressed immediately.

1.1 NON-CONFORMANCE REGISTRATION

CAR No.	Date Identified	Source	Description of Non-Conformance	Risk Rating(L/M/H)	Corrective Action Required	Responsible Person	Target Date	Status (Open/In Progress/Closed)	Verification / Close-out Comments	Verified By & Date

1.2 NON-CONFORMANCE CLASSIFICATION

Classification	Examples	Required Response
Minor	Incomplete records, housekeeping issues, missing signage	Correct within agreed timeframe.
Major	Repeated non-compliance, inadequate PPE, improper waste management	Immediate corrective action and follow-up inspection.
Critical	Fatality, serious injury, major pollution event, significant community impact, repeated willful non-compliance	Immediate stop works if necessary, notify MOHLR, investigate, implement corrective and preventive actions before work resumes.

1.3 ROOT CAUSE ANALYSIS

For all major and critical non-conformances, the Contractor shall identify the root cause, describe preventive measures to avoid recurrence, assign responsibilities, and verify effectiveness.

1.4 SUMMARY OF OUTSTANDING CORRECTIVE ACTIONS

Risk Level	Open	Closed This Period	Overdue
High			
Medium			
Low			

1.5 CERTIFICATION

Prepared by	
Reviewed by (MOHLR)	
Signature	
Date	

Annex P-7 - Contractor Environmental and Social Performance Evaluation BH-L1064

This form is intended for use by the MOHLR Project Implementation Unit during routine site visits, quarterly reviews, and contract close-out. It provides a simple assessment of the Contractor's overall environmental and social performance without requiring a complex scoring methodology. While Annex P-5 (Contractor Environmental and Social Inspection Checklist) is used for routine, item-level compliance verification during site inspections, this evaluation is completed periodically by the MOHLR Project Implementation Unit to provide a consolidated, higher-level rating of the Contractor's overall ESHS performance for contract administration purposes, drawing on the findings recorded in the Annex P-5 inspections and the corrective actions tracked in Annex P-6.

1 PROJECT INFORMATION

Project	
Contract No.	
Contractor	
Evaluation Date	
Evaluator	
Reporting Period	
Type (Interim/Final)	

1.1 PERFORMANCE ASSESSMENT

Performance Area	Satisfactory	Needs Improvement	Comments
Environmental management (waste, dust, noise, spills)			
Occupational health and safety			
Labor and working conditions			
Community health and safety			
Code of Conduct compliance			
Grievance management			
Quality of reporting			
Timely implementation of corrective actions			
Overall compliance with the ESMP			

1.2 MAJOR ISSUES IDENTIFIED

1.3 REQUIRED FOLLOW-UP ACTIONS

Action Required	Responsible	Target Date

1.4 OVERALL ASSESSMENT

Overall Rating (Satisfactory ☐ Needs Improvement ☐ Unsatisfactory)	
Contractor Eligible for Continued Work? (Yes No)	
MOHLR Representative	
Date	

Guidance

A 'Needs Improvement' rating should trigger a corrective action request. An 'Unsatisfactory' rating should prompt consideration of increased supervision, withholding of payments where permitted under the contract, or other contractual remedy.