



**Government of Antigua and Barbuda**

Ministry of Legal Affairs, Public Safety and Labour

Labour Department

**Environmental Management Framework**

For the

World Bank-Funded

Public and Social Sector Transformation Project

Active Labour Market Component: Temporary Employment Programme

**“ABSTEP”**

Antigua and Barbuda Skills Training and Empowerment Programme

**VERSION 2: REVISED JULY 2016**



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## ACRONYMS

DCA	Development Control Authority
EIA	Environmental Impact Assessment
EMF	Environmental Management Framework
EMP	Environmental Management Plan
GOAB	Government of Antigua and Barbuda
LD	Labour Department
LDTU	Labour Department Technical Unit
LO	Local Organization (Statutory Body, Civil Society Organization, Community Based Organization, Faith Based Organization, Nonprofit Organization)
PCRMP	Physical Cultural Resources Management Plan
PMP	Pest Management Plan
PMU	Project Management Unit
PSST	Public and Social Sector Transformation
TEP	Temporary Employment Programme

## INTRODUCTION

The Labour Department in the Ministry of Legal Affairs, Public Safety and Labour is implementing an active Labour market programme that aims to empower people to contribute to increased opportunities for employment. Framed in this programme, and as a component thereof, the Government of Antigua and Barbuda (GOAB) has decided to develop a Temporary Employment Programme (TEP), in order to improve employability among the most vulnerable through training and work experience. The Antigua and Barbuda Skills Training and Empowerment Programme (ABSTEP), referred to as ABSTEP-TEP will be implemented through public service, community interest projects (ABSTEP Subprojects, subprojects, or projects) prepared and implemented by Local Organizations (LOs).

The implementation of ABSTEP Subprojects may have a negative environmental impact. To this end, negative environmental impacts must be assessed and evaluated. Additionally, any remedial actions to mitigate those risks must be considered and put in place. Such actions must be documented and put into practice and be monitored regularly.

This document establishes the framework to evaluate ABSTEP Subproject proposals, jointly with the mitigation actions. It aims to ensure that ABSTEP Subprojects are in line with local legislation and the minimum standards defined by the World Bank for this type of activity.

ABSTEP provides monetary support to active job seekers, conditional on their participation in public service projects, as approved by the Labour Department. The TEP will: (i) develop and, or enhance work experience of the beneficiaries (ii) develop basic life, vocational and employment skills of the beneficiaries, and (iii) provide improvements in the physical condition, access to service, or other meaningful community based public service improvement throughout Antigua and Barbuda.

This document presents the Environmental Management Framework that will guide the approval and monitoring of ABSTEP Subprojects submitted for approval by Local Organizations (LOs). These guideline take into account national policy, local developments, and environmental responsibilities assigned by environmental law and other regulations.

When TEP subprojects are of low complexity in design, implementation and operation, the possible negative environmental impact may be smaller and often nonexistent; also, the environmental impact may be positive. In general, the impact is related to managing the environmental conditions of ABSTEP Subprojects during construction. It should be noted, that no subprojects to construct new infrastructure in health or education would be approved. This will result in lower environmental risks in the subprojects to be financed by the TEP.

Therefore, this Environmental Framework describes the Temporary Employment Programme and the activities to be developed, and identified in such activities, the risks or potential negative or positive environmental impact. It defines the procedures either to ensure the proper

management of these issues, for prevention or to mitigate negative impact. It also identifies and recognizes the positive impact of ABSTEP Subprojects.

The project was restructured in June 2016. The original EMF was written for the ABSTEP component of the project, and was developed for simple works that exclude environmentally complex subprojects such as those that would trigger the natural habitat, physical cultural resources, or pest management policies. The PMU and Labour Department are seeking to expand the base of project beneficiaries and have identified a number of projects that would trigger the referenced policies. As the project is currently undergoing a Level 1 restructuring, the policies can be triggered and the EMF revised and re-disclosed. Accordingly, the EMF has been revised and includes guidelines to develop Environmental Management Plans (EMPs) with specific procedures to mitigate impact of more complex projects (i.e., those triggering the referenced policies), as well as additional consultation of EMPs for projects with potential negative environmental impacts.

## 1. CHAPTER ONE: The Antigua and Barbuda Skills Training and Empowerment Programme (ABSTEP)

The following section summarizes the cycle of the ABSTEP and the associated subprojects.

### 1.1 Objectives

The overall objective of ABSTEP is to improve the employability and expand the possibilities of employment among the most vulnerable, and to contribute to improving the physical environment of Antigua's low-income communities.

Some specific objectives of ABSTEP are:

- (a) To train beneficiaries in the basic vocational skills, specific to the assigned ABSTEP Subproject to improve their skills;
- (b) To provide a job experience that increases the capacity of beneficiaries to interact as a team;
- (c) To pay beneficiaries for their participation with a direct cash transfer;
- (d) To contribute to improved physical conditions of low income communities through the construction and development of community interest projects that require Labour;
- (e) To help improve conditions of access and use of public services.

### 1.2 Description

ABSTEP is a transfer of an instrument of financing of unskilled Labour for the completion of public service projects. ABSTEP consists of a regular monetary transfer to its beneficiaries, subject to their participation in small public service work projects, as well as their participation in a training course on life, basic vocational and basic employment skills.

ABSTEP follows a structured cycle that defines the scope and duration of the participation of beneficiaries. This cycle is summarized as follows in *Table 1. Summary of the ABSTEP Cycle*.

Process	Responsibilities
1. Launch Public Media Campaign	Labour Department
2. Train Local Organizations (LOs) on Proposal Preparation	Labour Department (LD)
3. Prepare and Submit Proposals Includes the preparation of the technical, environmental and institutional aspects of the proposed project	Local Organizations

<b>Table 1: Summary of the ABSTEP Cycle</b>	
<b>Process</b>	<b>Responsibilities</b>
4. Conduct Ex-Ante Evaluation and Approval of Proposals Includes aspects of viability established in the Environmental Framework	Labour Department
5. Enroll, Rank and Select Eligible Beneficiaries This includes formalizing participation agreements with beneficiaries	Labour Department
6. Formalize Agreements with the LOs selected This includes notifying those LOs that were not selected of that decision.	Labour Department
7. Engage Training Facilitators	Contracted LOs
8. Match and Assign Beneficiaries to LOs	Labour Department
9. Establish Reporting Procedure with the Beneficiaries	Contracted LOs
10. Remit Payment for Procurement of Tools and Materials This includes an advancement of training costs, as approved. The resources to train Trainers will be made on a monthly basis.	PSST Project Management Unit
11. Procure Goods and Materials for the Implementation of ABSTEP Subproject	Contracted LOs
12. Implement ABSTEP Subproject This activity includes the induction and orientation of ABSTEP beneficiaries on best practices of work that incorporates environmental aspects, as well as occupational safety and health	Contracted LOs
13. Preparatory, On-Site and Hands-On Vocational Skills Training of ABSTEP Beneficiaries	Contracted LOs
14. Prepare and Submit Reports on Beneficiary Participation This includes weekly payroll reports for ABSTEP beneficiary workers to be submitted to the Labour Department	Contracted LOs
15. Monitor ABSTEP Subprojects This includes monitoring of the environmental impact of ABSTEP Subprojects, the delivery of the training courses, and beneficiary participation as agreed with the LO	Labour Department
16. Submit TEP Beneficiary Worker Payroll Report to PMU	Labour Department
17. Remit Scheduled Beneficiary Payments	Project Management Unit
18. Remit Payment to Facilitators	Contracted LOs
19. Prepare Summary Report This activity will include the reporting of the expenses incurred by the Local Organizations with the advanced fund on items such as tools, materials and training.	Contracted LOs

### **1.3 Scope**

The scope of ABSTEP is as follows:

- (a) ABSTEP will be executed over four (4) years in Antigua and Barbuda (2015 to 2018).
- (b) The target population will be economically disadvantaged citizens aged 17 to 50, with long-term unemployment and low employment qualifications, preferably persons who have completed at least the second grade of secondary education and are not registered as active employees or self-employed in the Social Security Board Register.
- (c) The scheduled payment to beneficiaries will be the National Minimum Wage, calculated at an hourly rate, for beneficiaries who comply with the requisite agreements. That is, participation in ABSTEP Subprojects and life, vocational and employment training
- (d) Each ABSTEP Subproject will run for six (6) consecutive months and may not employ more than fifteen (15) or less than five (5) beneficiaries.
- (e) The beneficiaries will spend five (5) hours per day, four (4) days a week on the activities of the subprojects and one (1) day a week in training, during the six (6) months of ABSTEP Subprojects.

### **1.4 ABSTEP Subprojects**

Given the characteristics of ABSTEP, in relation to the profile of beneficiaries and the objectives of contributing to the improvement of employability, ABSTEP Subprojects must meet the following guidelines:

- (a) Be of community interest;
- (b) Generate public benefits;
- (c) Be fully executed in six (6) months;
- (d) Components and activities should be adequate to ensure assignment of no more than fifteen (15) and no less than five (5) ABSTEP beneficiary workers;
- (e) Be of low complexity, that is they (i) should not require specialized structural designs; (ii) if any specialized studies are required (e.g. seismology, natural habitat or ecological effects, historical or anthropological resource evaluations, pesticide management plans, etc.), then projects should rely on existing studies which have been previously developed and established; and (iii) should not require sophisticated mechanisms for the implementation, in which beneficiaries cannot participate;
- (f) Subprojects for which construction and, or development involves the intensive use of skilled Labour do not qualify.

ABSTEP Subprojects should be framed within the following sectors of national and community development:

- Education and Health
- Community Centers
- Cultural, Recreational and Sport
- Social Services
- Urban Development
- Roads
- Environment Protection and Development
- Agriculture

The types of ABSTEP Subprojects that fall within these sectors and their accepted scope or dimensions are presented in *Table 2. Sectors, Types and Scope of ABSTEP Subprojects*, below.

<i>Table 2: Sectors, Types and Scope of ABSTEP Subprojects</i>		
<b>Sector</b>	<b>Orientation of Typology</b>	<b>Scope and Maximum Dimension</b>
a. Education and Health	<ul style="list-style-type: none"> <li>• Repairs or adjustments of public schools or public health centers</li> <li>• Expansion of public schools or public health centers</li> <li>• Campaigns on different health and/or education issues</li> <li>• Other projects related to the sector</li> <li>• Projects to construct new schools and health centers may not be submitted</li> </ul>	<ul style="list-style-type: none"> <li>• Do not require structural studies or handling of asbestos materials</li> <li>• Areas maximum of 200 m2, if you include water facilities on two levels.</li> <li>• Bounded by time and the number of beneficiaries</li> </ul>
b. Community Centers	<ul style="list-style-type: none"> <li>• Repair, adaptation or expansion of care infrastructure, including community kitchens, community centers etc.</li> <li>• Other projects related to the sector</li> </ul>	<ul style="list-style-type: none"> <li>• Do not require structural studies or handling of asbestos materials</li> <li>• Areas maximum of 200 m2, if you include water facilities on two levels.</li> <li>• Bounded by time and the number of beneficiaries</li> </ul>
c. Cultural, Recreational and Sport	<ul style="list-style-type: none"> <li>• Repair, adjustment or extension of public spaces such as plazas, parks,</li> </ul>	<ul style="list-style-type: none"> <li>• Do not require structural studies or design</li> </ul>

*Table 2: Sectors, Types and Scope of ABSTEP Subprojects*

<b>Sector</b>	<b>Orientation of Typology</b>	<b>Scope and Maximum Dimension</b>
Infrastructure	sports fields, etc.	
d. Social Services	<ul style="list-style-type: none"> <li>• Attention to the users of soup kitchens or any public social service e.g. nursing home, daycare, etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Limited to the space available and the number of people that can be attended to</li> </ul>
e. Urban Development	<ul style="list-style-type: none"> <li>• Repair or expansion of access (tertiary) roads, rural roads, channels, gullies, etc.</li> <li>• Maintenance and patching of roads.</li> </ul>	<ul style="list-style-type: none"> <li>• Routes with a maximum width of 4.00m</li> <li>• Patching of tertiary roads</li> <li>• Repairs that do not involve the construction of waterworks and sewers.</li> </ul>
f. Roads	<ul style="list-style-type: none"> <li>• Repair, expansion or adequacy of access (tertiary) roads, rural access, canals, emergency lanes, etc.</li> <li>• Maintenance and patching of roads.</li> </ul>	<ul style="list-style-type: none"> <li>• Routes with a maximum width of 4.00m</li> <li>• Patching of tertiary roads</li> <li>• Repairs that do not involve the construction of waterworks and sewers.</li> </ul>
g. Environmental and Historical Protection and Development	<ul style="list-style-type: none"> <li>• Sanitation projects, cleaning of streams, management of contaminated areas, etc.</li> <li>• Projects related to managing the buffer zones of protected areas.</li> <li>• ABSTEP Projects to protect or restore degraded areas or seabed.</li> <li>• Environmental campaigns.</li> <li>• Trail building or restoration in protected or natural areas, National Parks, etc., or other projects affecting natural habitat</li> <li>• Stabilization or restoration of historical structures, buildings, or other projects affecting physical cultural resources</li> <li>• Other projects with low complexity related to this sector</li> </ul>	<ul style="list-style-type: none"> <li>• Support for low-flow runoff, that does not require design of hydraulic structures</li> <li>• Limited to the general conditions of ABSTEP Subprojects.</li> <li>• Works affecting natural habitat or physical cultural resources must have the accompanying EMP and approvals, permits, and oversight from appropriate authorities.</li> </ul>

*Table 2: Sectors, Types and Scope of ABSTEP Subprojects*

<b>Sector</b>	<b>Orientation of Typology</b>	<b>Scope and Maximum Dimension</b>
h. Agricultural	<ul style="list-style-type: none"> <li>Projects involving any use or purchase of pesticide or herbicide, for example those related to the eradication or control of invasive species, fumigation or extermination of buildings, works related to nurseries or greenhouses, etc.</li> </ul>	<ul style="list-style-type: none"> <li>Works involving pest management must have the accompanying EMP and approvals, permits, and oversight from appropriate authorities.</li> </ul>

To avoid or minimize potential adverse impact of subprojects, the chosen strategy is to restrict the scope of proposals to be presented in competitive selection processes. Besides simplifying evaluation, this will also imply diminishing potential negative environmental impact, since subprojects of complexity will have been excluded through the negative list. This is done to ensure that only projects with low negative impact will be supported.

For subprojects that involve the use or purchase of pesticides or herbicides, or those that may affect natural habitats or physical cultural resources, an EMP must be prepared and accompany the subproject proposal. The EMP must be adapted from the guidelines in Annex B, C and D of this EMF.

## **2. CHAPTER TWO: Legal Framework**

The Environmental Protection and Management Act, 2015 (“the Act”) provides an integrated framework for sustainable environmental protection and management, to establish effective allocation of administrative responsibilities for environment management, the undertaking and coordination of environmental management, and related activities, and the incorporation of international treaty obligations with respect to the environment into national and law related matters. In addition the Act establishes and consolidates in one legal regime the implementation of Multilateral Environmental Agreements and provides the framework financial mechanism to implement the Act.

The Act contains detailed provisions for pollution control, monitoring and auditing, and lists controlled and hazardous substances as well as limits or standards for air and water quality, including drinking water, freshwater, and marine receiving bodies. Natural resources management is addressed by definition and protection of watersheds and wetlands, and listing of protected areas; in addition, wildlife protection and trade is addressed in the Act as well as genetic resources. Public information and registries are to be required, and a Policy Framework is to be developed as soon as practicable, which will include the basis for screening and evaluating development approvals by the EIA (environmental impact assessment) process.

The Act is supported by several pieces of legislation addressing different environmental aspects, a compendium of which can be found in Annex A. It is not likely that any of the proposed subprojects would fall under the stipulations of the Act, but in such case the relevant requirements must be followed as regards permits or other matters.

### **The objectives of the Environmental Protection and Management Act, 2015 are to:**

(a) ensure the establishment of an integrated environmental management system in which environment is managed in a sustainable manner;

(b) ensure that decisions pertaining to the environment are made in an integrated manner in which the Environment Department, in collaboration with appropriate authorities, non-governmental organizations and other persons, determines priorities and facilitates coordination among governmental entities to effectively harmonize activities and where necessary, take action to protect, enhance and conserve the environment;

(c) Provide for preventive and remedial measures for the control and mitigation of all forms of environmental degradation or pollution including the management of hazardous substances and wastes for the purposes of protecting human health and maintaining the quality of the environment;

(d) Facilitate the implementation of obligations assumed by Antigua and Barbuda under multilateral environmental agreements;

(e) Make provision for the sustainable financing for the management of the environment and conservation of natural resources in Antigua and Barbuda;

(f) Promote and encourage among all persons a better understanding and appreciation of the environment; and

(g) Enhance the legal, regulatory and institutional framework for environmental management in Antigua and Barbuda.

**This Act shall regulate the social relations with regard to:**

(a) protection of the environment for the present and future generations and protection of human health;

(b) conservation of biological diversity in conformity with the natural biogeographic characteristics of Antigua and Barbuda;

(c) the conservation and use of environmental media;

(d) the control and management of factors damaging the environment;

(e) the exercise of control over the state of the environment and over the sources of pollution;

(f) the prevention and limitation of pollution;

(g) the establishment and management of the National Environmental Monitoring System;

(h) environmental strategies, programmes and plans;

(i) collection of, and access to, environmental information;

(j) the economic organization of environmental protection activities;

(k) the rights and the obligations of the State, the municipalities, the juristic and natural persons in respect of environmental protection.

**The purposes of this Act shall be achieved by means of:**

(a) regulation of the regimes of conservation and use of environmental media;

(b) control over the status and use of environmental media and of the sources of pollution and damage;

(c) establishment of permissible emission levels and of environmental quality standards;

- (d) management of the environmental media and of environmental factors;
- (e) environmental impact assessment (EIA);
- (f) issuance of integrated permits for pollution prevention, limitation and control;
- (g) designation and management of areas placed under a special regime of protection;
- (h) development of the monitoring system for environmental media;
- (i) introduction of economic regulators and financial mechanisms for environmental governance;
- (j) regulation of the rights and obligations of the State, the juristic and natural persons.

As regards labor health and safety, the governing regulations are found in *Division D of the Antigua and Barbuda Labour Code, Cap 27, as amended* as further explained in Chapter 4.3 of this EMF.

### **3. CHAPTER THREE: Institutional Framework**

#### **3.1 General**

Activities related to environmental management and natural resources at the national level are consolidated under the responsibility of the Department of Environment in the Ministry of Health and the Environment.

#### **3.2 Department of Environment in the Ministry of Health and the Environment**

The Ministry of Health and the Environment is the principal public institution of the government responsible for financing, regulating, creating policies, guidance, human resource management, and delivering of all public health care services and to implement policy and strategy to promote activities and initiatives which are geared towards safeguarding and preserving the environment. It formulates and implements the Government's policies and strategies and monitors and coordinates the work of various agencies and bodies that support the sector. It executes its responsibilities through various Departments and Divisions and collaborates with a range of national organizations in the public and private sectors, as well as regional and international agencies. Besides the Ministry, the Minister has responsibility for several public sector entities, Boards and Committees in the sector.

The Department of Environment is the body within the government that coordinates the management and sustainable use of the twin-island state's natural resources through collaboration with the agencies responsible for the natural resources.

The Department also has a mandate towards the protection of the environment. The Environmental Protection and Management Act 2015 states that environmental protection shall be based on the following principles:

- (a) sustainable development;
- (b) prevention and reduction of risk to human health;
- (c) priority of pollution prevention over subsequent elimination of pollution damage;
- (d) public participation in and transparency of the decision making process regarding environmental protection;
- (e) public awareness regarding the state of the environment;
- (f) polluter pays for damage caused to the environment;
- (g) conservation, development and protection of ecosystems and the biological diversity inherent therein;

- (h) restoration and improvement of environmental quality in polluted and disturbed areas;
- (i) prevention of pollution and damage and of other adverse impacts on clean areas;
- (j) integration of environmental protection policy into the sectorial and regional economic and social development policies;
- (k) access to justice in environmental matters.

### **3.3 Involvement of the TEP**

With the description of the institutional framework, it can be concluded that Antigua and Barbuda has the relevant regulations and instruments to control and manage environmental issues arising from public investments.

Institutional intervention in the environmental aspects of all ABSTEP Subprojects will be conducted by the Department of Environment. The intervention of the Department of Environment is part of the implementation of its policies and functions and will be given in three directions:

- (a) Respond to requests for technical information on environmental aspects of the ABSTEP Subproject, to be submitted by the local organization, based on the requirements of the instrument designed for the preparation of subprojects. That is the local organization will consult the Department of Environment on environmental permitting requirements, standards to be met, mitigation measures or management, etc.
- (b) Respond to requests for information and assistance to the Labour Department's Technical Unit (LDTU) in the process of evaluating the environmental aspects of the subprojects, according to the guidelines of the instruments designed for this purpose. The Department of Environment will provide all information to the LDTU on local regulations applicable to ABSTEP Subproject and facilitate technical developments it has for the environmental aspects and that type of project.
- (c) The Department of Environment will monitor the environmental aspects of public investment as part of its functions. This includes ABSTEP Subprojects. Similarly if the LDTU considers it necessary, it will request technical assistance and comments and observations of the Department of Environment that it considers necessary in the course of the project monitoring.

ABSTEP Subprojects that could cause minor environmental impact are referenced as "Category B" projects by the World Bank in its "Environmental Assessment" Policy OP4.01. Most ABSTEP Subprojects are not expected to be environmentally complex and will therefore not require environmental impact studies, or trigger additional studies and environmental safeguard

policies. Some ABSTEP Subprojects, however, may involve somewhat complex environmental management questions, as discussed in Chapter 4 of this EMF. In these cases it is anticipated that the institutional intervention of the Department of Environment will support and provide technical assistance in the preparation and implementation of the subproject to ensure proper management of mild, moderate and manageable impact that may arise in the development and implementation of these Subprojects.

#### 4. CHAPTER FOUR: Analysis of Potential Impact of Investments

The participation of ABSTEP in the execution of small works and environmental management activities triggers the World Bank’s safeguard policy related to Environmental Assessment, *Operational Policy (OP4.01)*. ABSTEP Subprojects are generally classified as “Category B” due to the probability of generating only minor and easily mitigated impact, and some may be “Category C” if they generate no impact at all. Environmental review is required of ABSTEP Subprojects to determine potential positive and negative impact; to make recommendations to avoid, minimize and mitigate adverse impact; and to compensate communities where impact are unavoidable. At the same time, beneficiaries should be consulted about the interventions and their potential environmental and social impact.

##### 4.1. Categories of ABSTEP Subprojects

According to *World Bank Groups’ Definition of Projects Categories*, projects to be funded could belong to “Category B”, meaning that in some cases their approval may require the authorization of the Department of Environment. Projects under environmental “Category A” are not acceptable for ABSTEP since those classifications refer to projects that involve major, irreversible, or significant environmental impact, which would be excluded from ABSTEP. ABSTEP Subprojects involving extensions, improvements, and infrastructural adjustments do not require an environmental license or permit.

“Category B” projects have moderate environmental impact, are easily preventable and correctable, and there are viable and economic alternative technologies. They are considered projects with moderate or low environmental impact. Projects classified as “Category B” generally may include water, wastewater, storm water networks, solid waste and interventions in water sources. Activities that are on the "negative" list are detailed in *Table 3 List of Subproject Types Excluded* below. This list will be referenced when preparing and evaluating ABSTEP Subproject proposals. The LDTU is responsible to ensure that during the promotion phase of the programme, proponents know the project types and scope allowed.

1. Projects related to potable water and basic sanitation
2. Treatment plants
3. Landfills
4. Slaughterhouses
5. Storm water networks
6. New construction of social infrastructure (health, education, welfare, cultural)
7. Construction of new Dwelling/ Housing
8. Opening of new roads where there were no roads in protected areas

9. Projects that generate involuntary displacement of people or which involve the non-voluntary acquisition of private property
10. New urban roads
11. Projects involving the use of protected plants or animals
12. Projects categorized as “A” (with major, significant, irreversible or long-term impact)
13. Projects that would affect forests or that may change the management or use of forest lands

All subprojects considered in ABSTEP will adhere to the guidelines in Table 2 and Table 3 of the present EMF. In addition, all projects will undergo a review that will consider the magnitude and nature of potential impact as described in Table 4, and will follow the guidelines to prepare mitigation measures in Table 5.

#### **4.2. Potential Impact of ABSTEP Subprojects**

*Table 4 Potential Impact of ABSTEP Subprojects*, below, describes some of the most common negative impact of subprojects in the identified sectors. It is possible, that depending on the specifications of each ABSTEP Subproject they will have other impact. These will be found during the proposal preparation process with the support of the Department of Environment.

<b>Sector</b>	<b>Types</b>	<b>Possible Impact</b>
a. Education and Health	<ul style="list-style-type: none"> <li>• Repairs or adjustments of schools or health centers</li> <li>• Expansion of schools or health centers</li> <li>• Campaign on different health and/or education issues</li> <li>• Other projects related to the sector</li> <li>• Projects to construct new construction of schools and health centers cannot be presented</li> </ul>	<p><b><i>During construction:</i></b></p> <ul style="list-style-type: none"> <li>• Deterioration or invasion of urban public space</li> <li>• Disposal of construction waste</li> <li>• Effect on air quality (dust and odors)</li> <li>• Deterioration of surrounding green areas</li> <li>• Increased traffic and access limitations</li> <li>• Temporary hazards for pedestrians and residents</li> <li>• Noise</li> <li>• Occupational hazards and risks to workers</li> </ul> <p><b><i>During the operation:</i></b></p> <ul style="list-style-type: none"> <li>• Increase of wastewater in relation to the capacity of the disposal system</li> <li>• Affecting space comfort, ventilation and light (positively or negatively)</li> </ul>
b. Community	<ul style="list-style-type: none"> <li>• Repair, adaptation or</li> </ul>	<p><b><i>During construction:</i></b></p>

*Table 4: Potential Impact of ABSTEP Subprojects*

Sector	Types	Possible Impact
Centre	expansion of care infrastructure, including community kitchens, community centers etc. • Other projects related to the sector	<ul style="list-style-type: none"> <li>• Deterioration or invasion of urban public space</li> <li>• Disposal of construction waste</li> <li>• Effect on air quality (dust and odors)</li> <li>• Deterioration of surrounding green areas</li> <li>• Increased traffic and access limitations</li> <li>• Temporary hazards for pedestrians and residents</li> <li>• Noise</li> <li>• Occupational hazards and risks to workers</li> </ul> <p><i>During the operation:</i></p> <ul style="list-style-type: none"> <li>• Increase of wastewater in relation to the capacity of the disposal system</li> <li>• Affecting space comfort, ventilation and light (positively or negatively)</li> </ul>
c. Cultural, Recreational and Sport Infrastructure	<ul style="list-style-type: none"> <li>• Repair, adjustment or extension of public spaces such as plazas, parks, sports fields, etc.</li> </ul>	<p><i>During construction:</i></p> <ul style="list-style-type: none"> <li>• Deterioration or invasion of urban public space</li> <li>• Disposal of construction waste</li> <li>• Effect on air quality (dust and odors)</li> <li>• Deterioration of surrounding green areas</li> <li>• Increased traffic and access limitations</li> <li>• Temporary hazards for pedestrians and residents</li> <li>• Noise</li> <li>• Occupational hazards and risks to workers</li> </ul> <p><i>During the operation:</i></p> <ul style="list-style-type: none"> <li>• Increase of wastewater in relation to the capacity of the disposal system</li> <li>• Affecting space comfort, ventilation and light (positively or negatively)</li> </ul>
d. Social Services	<ul style="list-style-type: none"> <li>• Attention to the users of soup kitchens or any public social service e.g. nursing home, daycare, etc.</li> </ul>	<ul style="list-style-type: none"> <li>• No negative impact other than possible poor food safety handling practices.</li> <li>• You can present positive impact in terms of waste management, which can improve by</li> </ul>

*Table 4: Potential Impact of ABSTEP Subprojects*

Sector	Types	Possible Impact
		increasing people serving the population.
e. Urban Development	<ul style="list-style-type: none"> <li>• Repair or expansion of access (tertiary) roads, rural roads, channels, gullies, etc.</li> <li>• Maintenance and patching of roads.</li> </ul>	<p><b><i>During construction:</i></b></p> <ul style="list-style-type: none"> <li>• Potential conflicts with the urban plan orders</li> <li>• Provision and management of construction debris or other waste</li> <li>• Airway obstruction or increased traffic</li> <li>• Inconvenience to pedestrians</li> </ul> <p><b><i>During the operation:</i></b></p> <ul style="list-style-type: none"> <li>• No negative impact</li> </ul>
f. Roads	<ul style="list-style-type: none"> <li>• Repair, expansion or adequacy of access (tertiary) roads, rural access, canals, emergency lanes, etc.</li> <li>• Maintenance and patching of roads.</li> </ul>	<p><b><i>During construction:</i></b></p> <ul style="list-style-type: none"> <li>• Deforestation</li> <li>• Effect on bodies of water</li> <li>• Alteration of public space</li> <li>• Management and disposal of removed material</li> <li>• Obstruction of roads, increased machinery and traffic</li> <li>• Worker health and safety</li> <li>• Emission of dust and particles</li> </ul> <p><b><i>During the operation:</i></b></p> <ul style="list-style-type: none"> <li>• Emission of pollutants caused by traffic growth</li> <li>• Increased noise</li> <li>• Alteration of air conditions for nearby residents</li> <li>• Stability risks</li> <li>• Increase the possibility of intervention in protected areas</li> </ul>
g. Environmental Protection and Development	<ul style="list-style-type: none"> <li>• Sanitation projects, cleaning of streams, management of contaminated areas, etc.</li> <li>• Projects related to managing the buffer zones of protected areas.</li> </ul>	<p><b><i>During execution:</i></b> (These impact can be positive or negative depending on the activities of ABSTEP Subprojects):</p> <ul style="list-style-type: none"> <li>• Effect on bodies of water</li> <li>• Alteration of vegetation (undergrowth)</li> <li>• Risk of encouraging deforestation for fuel</li> </ul>

*Table 4: Potential Impact of ABSTEP Subprojects*

Sector	Types	Possible Impact
	<ul style="list-style-type: none"> <li>• Projects to protect or restore degraded areas or riverbeds.</li> <li>• Trail rehabilitation</li> <li>• Historic structure stabilization or restoration</li> <li>• Environmental campaigns.</li> <li>• Other projects with low complexity related to this sector</li> </ul>	<ul style="list-style-type: none"> <li>wood</li> <li>• Selection of species incompatible with the ecosystem</li> <li>• Erosion or destruction of trees, plants, or protected species</li> <li>• Inadvertent damage to historic structures</li> <li>• Conflicts over land use</li> <li>• Handling and disposal of waste in inappropriate places</li> </ul>
h. Agricultural Projects	<ul style="list-style-type: none"> <li>• Campaigns to eradicate invasive species</li> <li>• Greenhouse or nursery construction or rehabilitation</li> <li>• Fumigation or extermination of buildings</li> </ul>	<ul style="list-style-type: none"> <li>• Soil contamination by herbicides or pesticides</li> <li>• Runoff of chemicals to streams or infiltration to groundwater</li> <li>• Unintentional damage to non-target species</li> <li>• Improper training or application causing damage to workers or the public</li> </ul>

The types of projects involving construction that will be accepted by ABSTEP generally have minor impact related to the disposal of construction debris, air impact, or minor discomfort typical of small construction works. Therefore, the environmental aspects to be considered during implementation or development of ABSTEP Subprojects, must take into account construction practices, safety measures and occupational hygiene. This type of impact can be addressed through the minimum and standard mitigation measures in Section 4.3 and 4.4 below, and must be applied to all subprojects as the standard Environmental Management Plan (EMP).

Some ABSTEP subprojects may have a negative potential impact to natural habitats, physical cultural resources, or have pest management issues. In these cases there are additional requirements that must be included in a separate EMP specially developed for the specific situation, as described in Section 4.5 below.

### **4.3. Standard Mitigation Measures for All Subprojects**

Mitigation measures for ABSTEP Subprojects include best practices in construction, safety and health. Attention will be paid to *Division D of the Antigua and Barbuda Labour Code, Cap 27, as amended* and the *Environmental, Health and Safety Guidelines* of the World Bank. Therefore,

all the authorities involved in the direct implementation of ABSTEP Subproject - the LOs, the PMU and the LDTU- must remain knowledgeable and be aware of national regulations and the World Bank guidelines.

All ABSTEP Subprojects that involve construction activities should incorporate the costs of safety/traffic equipment, signage and other expenses related to safety and health of both workers (TEP beneficiaries) and residents in the area of direct influence.

From an analysis of the data in *Table 4 Potential Impact of ABSTEP Subprojects*, we conclude that the main preliminary effect identified, refer to those generated in the construction phase of small social infrastructure, mainly for the disposal of construction waste materials, and the impairment of air dust, noise or increased traffic. These effects are of short duration, localized, reversible, not cumulative, and remediable by mitigation at low cost. Cited below are the main steps to follow for standard mitigation of such impact. Although the list is not exhaustive, it identifies specific negative effects and the preparation stage of ABSTEP Subprojects as follows:

#### **4.3.1 Noise and Dust Control**

- a) Maintain the speed of the vehicles involved in the works below 20 mph;
- b) Keep noise levels of teams below 90 db;
- c) In residential areas or those near to hospitals, measures to mitigate the noise level may be more stringent, such as restricting the hours and number of hours allowed for the use of equipment that generate noise;
- d) Minimize the production of dust and particles, by spraying water in the areas close to the dust source;
- e) Cover areas with vegetation to avoid exposure to wind.

#### **4.3.2 Cleanliness of the Work Site**

- a) Define the daily activities involved with cleaning ABSTEP Subprojects areas and fulfill these tasks;
- b) Review daily hygiene conditions in which workers operate, and ensure water and sanitary facilities area available;
- c) In the case of healthcare services projects, cleaning of the facility where services are provided must be checked daily;
- d) Trash and debris should be stored in designated areas and collected by licensed haulers;
- e) Standing water shall not be permitted to accumulate at work sites;
- f) Sediment and silt will be stopped from leaving the site to drains or canals by barriers, berms, catchments, or other measures

#### **4.3.3 Safety and Access**

- (a) Clearly mark paths for workers and restrict access for people who can go through the project. For example in the case of works of urban development, crosswalks should be noted and clean;

- (b) Safety and health training for workers;
- (c) In cases where required, provide personal protective equipment;
- (d) All paints and preservatives shall only be used with the approval of the supervisor;
- (e) For all works alongside roadways, appropriate safety signage and barriers shall be used to ensure the safety of any foot traffic or vehicular traffic.

These mitigation measures will form the basis for the environmental management plans for each subproject. These measures shall be included into the Operations Manual and into individual contracting arrangements to insure they are carried out.

#### **4.4. Aspects of Occupational Safety and Health**

This section shall apply to work and activities involving the participation of the beneficiaries, from preparation to completion thereof, according to *Division D of the Antigua and Barbuda Labour Code Cap 27, as amended*. During execution, the LOs will be required to develop and implement a minimum safety and health standard for workers, adapting to the risks employees are exposed to. The safety and health plan shall indicate the applicable safety procedures, equipment and technical aids, and corrective measures to avoid and/or reduce risks.

Coordination efforts to implement safety and health measures based on general and specific risks are foreseen. When worksite verification visits are conducted by the LD, the activities completed, the observations and recommendations made, and compliance recorded.

- (a) **Safety Signs:** ABSTEP Subproject area should be equipped with appropriate signage designed to identify risk areas and to warn of the dangers of accidental contact; the risks of falls; and to detail the required use of protective equipment specific to each activity executed. There must be well-equipped first aid kits at easily accessible locations for the treatment of minor injuries;
- (b) **Information and Training:** Beneficiaries should be suitably informed of the risks to their safety and health to which they can be exposed in the workplace. Education and training on the means available to prevent and control such risks and to protect themselves shall be made available.

*Table 5 Characteristics and Possible Measures below*, highlights preventative measures that can be applied in projects involving infrastructure and environmental sanitation.

<b>Table 5: Project Characteristics and Possible Mitigation Measures</b>
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<b>Sector</b>	<b>Characteristics</b>	<b>Possible Measures</b>
Infrastructure	<ul style="list-style-type: none"> <li>• Repairs, adjustments or extensions of small infrastructure, especially from the second story level.</li> <li>• Demolition and debris removal by hand</li> <li>• Mixtures of cement, lime etc.</li> <li>• Other industry-related</li> </ul>	Standard or Generic EMP with: <ul style="list-style-type: none"> <li>• Training in Occupational Health and Safety</li> <li>• Use of Masks</li> <li>• Belts to support lifting weights</li> <li>• Protective Helmet</li> <li>• Corresponding Signage</li> </ul>
Environmental Sanitation	<ul style="list-style-type: none"> <li>• Recovery of riverbeds</li> <li>• Cleaning of gullies</li> <li>• Management of contaminated areas</li> <li>• Cleaning of gutters etc.</li> </ul>	Standard or Generic EMP with: <ul style="list-style-type: none"> <li>• Training in Occupational Safety and Health</li> <li>• Use of masks, gloves,</li> <li>• Corresponding Footwear</li> <li>• Corresponding Signage</li> </ul>
Environmental Protection and Development	<ul style="list-style-type: none"> <li>• Trail rehabilitation</li> <li>• Historic structure stabilization or restoration</li> </ul>	Separate and Special EMP (see Annex B and C for details)
Agricultural	<ul style="list-style-type: none"> <li>• Campaigns to eradicate invasive species</li> <li>• Greenhouse or nursery construction or rehabilitation</li> <li>• Fumigation or extermination of buildings</li> </ul>	Separate and Special EMP (see Annex D for details)

#### **4.5. Special Mitigation Measures for Complex Projects**

If a subproject has any potential negative environmental impacts, such as upon natural habitat or physical cultural resources, or if it involves pesticides, then it will require the preparation of a separate and specialized EMP, as indicated in Table 5 above.

Activities proposed for work at historic sites, for example those to be considered under the restructuring, could have a potential impact on physical cultural resources, thus triggering OP4.11. For these types of subprojects, a separate additional EMP must be prepared in accordance with the guidelines in Annex B. The EMP must include reinforcement of the provision that any and all works take place under direct supervision of NPA staff, and that additional training is given to workers to avoid unintentional activities that could inadvertently harm physical cultural resources. This will avoid any ambiguity with the intent of the Policy objective to “assist in the preservation of cultural property and prevent any destruction or damage.” The EMP adapted will provide guidance for labour activities such as weed-cutting to clear brush and help maintain areas which have previously been investigated and/or restored; the

capping of brick walls to preserve them until future restoration efforts can begin; and, other clearly defined tasks which are conducted under the direct supervision of the designated authority (NPA) and its site expert.

Another type of project which requires a separate EMP is for works within the National Park system regards natural habitats. Work on restoration or maintenance of nature trails will require EMPs to ensure that environmental aspects are addressed and that provisions of OP4.04 (Natural Habitat) are adhered to. For these cases, the subproject must have a separate EMP and include direct supervision of works in these areas by NPA staff. Annex C contains guidance to develop EMPs for these types of projects.

Finally, some potential projects may involve the use or purchase of pesticides, herbicides, or other chemicals to manage pests. For example, Antigua has developed a programme to monitor and remove the Giant African Land Snail, which is an invasive species highly destructive to crops and gardens, and which carries human disease (rat lungworm nematode). Most work involves accurate monitoring and observation, as well as community involvement in reporting and collecting the snail, but eradication is also pursued by using bait stations with iron phosphate and metaldehyde. Other projects that could involve pest management issues include termite treatment for building foundations, extermination or fumigation of buildings, or use of pest control agents in the Botanical Gardens, if needed. Annex D contains guidelines to develop EMPs for these types of projects. If a subproject will involve the significant use or purchase of pest control agents, then a separate Pest Management Plan (PMP) would need to be developed, and Annex D has guidelines for this as well; however, this situation is not anticipated for ABSTEP, since most temporary labor activities will center on monitoring, data collection, and reporting, and not on actual purchase or use of chemical agents.

It is important to note that any projects with potential negative environmental impacts on natural habitat, physical cultural resources, or involve pesticides, will require the preparation of a separate EMP. In addition the EMP must be disclosed and a public consultation must be held, to ensure that any concerns are addressed. Additional details are given in Annex B, C, and D.

#### **4.6. Questions Regarding Potential Involuntary Resettlement**

This TEP excludes proposals that could lead to the involuntary displacement of persons or the acquisition or expropriation of land or other assets that adversely affect the socio-economic well-being of the population that will acquire these assets, and the communities that live there. These adverse impact, generally defined as involuntary resettlement, include physical relocation, disruption of living environments, forfeiture or damage to crops or other assets, and could result in economic harm or the potential bankruptcy of the communities or individuals involved. In addition the involuntary acquisition of lands by expropriation or any other economic displacement would trigger the Involuntary Resettlement Policy and so require additional studies to mitigate potential damages or harm to the affected parties. Therefore, this will be avoided by

identifying and excluding any potential subprojects where involuntary settlement might occur, relying on informed consultation and expert advice as required.

To prevent activation of proposals that may involve potential involuntary resettlement, ABSTEP will incorporate a strategy for identifying whether or not there is any potential land acquisition, and if so that it is strictly voluntary. If there is any type of land acquisition being considered for a subproject, a high priority will be to identify those characteristics in subproject proposals, and for personnel to provide advice to the executing agencies, and monitor approved and implemented ABSTEP Subprojects. The following details the criteria used for identification and selection of these projects and to ensure that any potential subproject activities would not be undertaken without the displaced or compensated persons' informed consent or power of choice, and thereby screen out any subprojects that would trigger the Involuntary Resettlement Policy and therefore require the preparation and administrative processing of associated mitigation plans, studies and other requirements.

Guidance criteria to determine whether there is Informed Consent in the acquisition of land appears below:

- (a) The infrastructure does not have to be specific to site where ABSTEP Subproject is located;
- (b) The impact should be minor, i.e., should not involve more than 10% of the area involved or require physical adjustment;
- (c) The land required to meet the technical requirements of ABSTEP Subproject must be identified by the affected community, not by executing agencies or authorities of the TEP however, the technical authorities can help ensure that the land will be appropriate for the purposes of the project and it will not have harmful consequences in terms of health or the environment;
- (d) The land in question must be free of intruders, usurpers or other impediments;
- (e) Verification, (e.g., attorney or witnesses), of the voluntary nature of donations must be obtained from each person who donates land;
- (f) In anticipation of any loss of income or physical movement, it will be necessary to verify the voluntary acceptance of the community, along with mitigation measures, by those who will be adversely affected;
- (g) If there are community services to be provided under a ABSTEP Subproject, the land must pre-exist in the community, or there should be signed guarantees by the owner allowing public access;
- (h) Lands cannot be acquired if they are in use for the economic benefit of the individual or community, such as crop production, shops or stores, fruit stands, or other such use;
- (i) Mechanisms to receive complaints shall be provided.



## 5. CHAPTER FIVE: Procedures for Environmental Management

Five basic measures comprise the strategy to address environmental safeguards: (a) the preparation of this EMF, which may be subject to periodic revision as needed; (b) appointing the Department of Environment of the Government as responsible to manage the environmental issues; (c) the provision of training workshop for Local Organizations in charge of subprojects implementation to train them in the process of subproject proposal presentation to ensure inclusion of adequate environmental and health and safety measures and/or equipment; (d) training for teams of workers in regard to environmental management and health and safety; and (e) a detailed OM that includes guidelines based on the EMF to be followed during the project cycle.

### 5.1. Preparation and Submission of ABSTEP Subprojects

To assist LOs with the preparation of subprojects a training workshop will be held. The workshops for LOs will provide a detailed training to present proposals. The workshops will be provided by the Programme Coordinator of the programme and a representative of the Department of Environment. The course will provide an overview of the institutional and legal framework that regulates the activities to be undertaken in the subprojects as reported in the EMF, which will guide the evaluation of the proposals. In the case of presentation of proposals with potential adverse impact, they will be highlighted and special attention will be paid to the complementary pieces of information to be attached to the presentation, such as suggested mitigation measures by the implementing institution.

The preparation and presentation of ABSTEP subprojects by the LOs will be made through a format that contains information relevant to determining the feasibility of the subproject in different aspects: technical, institutional, environmental, social and financial. The main issues to consider in the preparation of ABSTEP Subprojects are:

#### (a) Subproject Identification

- i. **Name:** The name of subproject should include the main activity, the intervention sector and location. For example:

Principal Activity	Sectorial Intervention	Location
Improvement	of the school...	Community/Parish
Tree planting	of the river bank	(Name)in the district
Repair	of the health center	(Name)
Attention	to community dining	Community/Parish
Construction	of sidewalks	Community/Parish

- ii. **Sector or Typology:** All ABSTEP Subprojects must meet the following criteria:

- Be of Community interest;
- Generate public benefits;
- Be fully implemented for six (6) months;
- The components and activities should be adequate to ensure an allocation of no more than fifteen (15) and no less than five (5) ABSTEP beneficiaries;
- Be of low complexity. That is they, (i) do not require specialized structural designs, (ii) do not require other specialized studies as soils, seismology, etc. and, (iii) do not require sophisticated mechanisms for implementation, in which the beneficiaries cannot participate;
- Subprojects which construction and, or development involve the intensive use of skilled Labour do not qualify.

ABSTEP Subprojects should be framed within the following sectors of local and community development:

- Education and Health
  - Community Centres
  - Cultural, Recreational and Sport Infrastructure
  - Social Services
  - Urban Development
  - Roads
  - Environmental Protection and Development
  - Agriculture
- iii. **Location:** ABSTEP Subprojects must clearly identify the city, section, place or neighborhood in which they will conduct the subproject activity. In the case of urban development ABSTEP Subprojects, the community will be chosen from the list of communities presented in the TEP.
- iv. **Address:** The place where ABSTEP Subprojects will be executed. Where there is no accurate address, explain the location.
- v. **Duration:** The number of months of implementing the activities proposed in ABSTEP Subprojects, which will be six (6) months.
- vi. **Number of ABSTEP Beneficiaries:** Number of people who provide the unskilled Labour and who will receive training provided by ABSTEP. This number will be estimated according to the needs of ABSTEP Subproject and maximum capacity workforce. The ceiling of beneficiaries allocated to each ABSTEP Subprojects will be fifteen (15).

## **(b) Information on the Local Organization**

The local organization responsible for ABSTEP subproject is the executing agency and is responsible for the preparation, financing and proper execution of the subproject. The executing agency shall ensure full compliance with the objectives of ABSTEP in relation to the direct beneficiaries and their on-the-job and classroom training.

- i. **Name and Type of Executing Agency:** Write the full name of the local organization (LO) and the acronym for which it is known. Indicate the type of institution- Statutory Body, Friendly Society, or nonprofit association.
- ii. **Address:** Address of the headquarters of the LO. If the LO has one or more other locations where some action related to ABSTEP subproject will take place, include it.
- iii. **Telephone Number:** Include the telephone number for the headquarters and phone numbers for those directly responsible for ABSTEP subproject.
- iv. **Email:** Include the email address of the legal representative and the head of ABSTEP Subproject.
- v. **Name of the Head/Responsible Person for ABSTEP subproject**
- vi. **Specialty of the Institution:** In the case of Statutory Bodies, it is especially necessary to explain this point, as they are public bodies that manage public investment as determined by law, in search of national development. For non-profit associations, explain the field or fields of social development in which it performs its functions. This explanation should be short (no more than three sentences) but accurate. Some short examples of what to include in this section are:
  - To promote the social development of the region, through investment projects in the areas of health and housing.
  - To promote recreation and sport.
  - Supporting the most vulnerable communities in management processes to achieve improvements in their conditions.
  - Contribute to social development through research, education and training, and advisory and consultancy services.
  - Contribute to the protection and improvement of the environment through environmental investment projects, campaigns and training.
  - Facilitate and provide training and development courses in topics defined by the Employer Skills Demand Survey

- Develop recreational activities, crafts, workshops, and sports for the elderly.
- vii. **Experience in Similar Projects:** Present and explain briefly (three lines) the kind of experience the LO has had in similar projects related to the theme for which ABSTEP Subproject is presented.
- viii. **Community Project Experience:** Mention the last three (3) projects developed in the relevant sector, with the respective cost, duration and end date. The project name must include sufficient information to understand the main activity, the development sector and location of the project, similar to how the name of ABSTEP Subproject is presented.

### (c) Objectives and Goals

- i. **Goal of Subproject:** The purpose of the ABSTEP Subproject is to improve conditions and get goals from different sectors of development (service coverage, improved conditions for health, facilitate access to goods, improve environmental conditions, reduce risk, etc.).
- ii. **Specific Objectives:** In some cases, the overall goal frames and defines all the activities but in other cases, there are projects with activities that have objectives that are more specific. In this case, these must be submitted. For example, in environmental projects, it is common for the overall project objective to be recovery of a degraded area. However, with the efforts to achieve this recovery, they also have other objectives such as training specific to the population of the buffer zone, improved cropping practices, etc.
- iii. **Physical Targets:** Refers to the main physical products of the works or activities related targets to be developed in compliance with the objectives. For example, Xm of infrastructure repair, Xm of extension, Xm of paint, X ml of perimeter fences, X hectares of tree planting with X units of plant commissioning. In any case, the selected unit must be a measurable unit.
- iv. **Goals of Services:** ABSTEP Subproject service goals will be the number of people per day to be serviced by the project. For example, 100 children/day (for soup kitchens), 59 elderly/day (attention), etc. For other services such as grooming, the unit may be cleaning a number of health units, etc. The units of measurement depend on the type of project.
- v. **End Users:** This refers to the population that will receive the benefits of ABSTEP Subproject; these may be direct or indirect beneficiaries. These end users are NOT ABSTEP beneficiaries. It is assumed that, in general, all of society are indirect beneficiaries of social development projects. This is NOT the information requested in

the preparation of ABSTEP Subprojects. What is required is information on the population directly affected by ABSTEP Subproject. For example, in environmental projects the direct beneficiaries are those closest to the project that will benefit from the change to environmental conditions caused by the project. In the case of service projects to assist vulnerable populations, this population directly benefits from ABSTEP Subproject (number of beneficiaries). In the case of expansion of health and education infrastructure, the population served by ABSTEP Subproject may be current users who benefit from improvements in physical conditions and/or new users who benefit from expanded coverage.

#### **(d) Information Sources and Preparation of ABSTEP Subprojects**

- i. **Origin:** Explain briefly, how the project originated, with evidence of community interest or participation. Some examples are:
  - Project originated in the budget submitted by the community;
  - The population located in the area expressed interest in improving conditions;
  - The local organization identified a problem affecting certain communities, and organized community meetings to verify the problems identified.

This section will explain the process of consultation with the beneficiaries of the subprojects. Since ABSTEP subprojects can arise from requests from the community, the LO needs to describe this process.

For cases where projects involve communities larger than the applicants, the LO will convene a meeting with all the communities that could be affected positively or negatively by ABSTEP subproject and present all aspects of the project and its anticipated impact with the aim of receiving acceptance of the proposed TEP Subproject by the communities.

- ii. **Situation to Change:** Explain precisely and summarize the problem, need or status to be changed by ABSTEP Subproject in a measurable format. Some examples are:
  - 25 families affected by pollution generated by the clogging of water in the canyon caused by trash and debris are thrown into it
  - An area of X sq. km of environmental conservation is being affected by agricultural activities and the use of firewood for the inhabitants located in the buffer zone

- About 50 children who attend the soup kitchen located in X community are served by 3 people, so they must wait a considerable time for treatment because of lack of staff. Additionally, the dining space (X sq. m) generates discomfort and limitations of user access
- Wastewater from the community causes odors, pollution, and risks of infection for children who may be in contact with them
- This school has X health services, which has been inadequate, causing discomfort, pollution, odors, etc.

iii. **General Description of ABSTEP Subproject:** Briefly describe the activities that will be developed under the projects aimed at overcoming the situation described above. Use statistics to help understand the dimension of ABSTEP Subprojects. Some examples are:

- ABSTEP Subproject will plant an area of X sq. m with appropriate species for fuel wood use and empower people of the buffer zone in the use and management of the conservation area. Additionally, agricultural production will be rearranged so that it does not affect surrounding environmental conditions.
- ABSTEP Subproject is to expand the dining area of the soup kitchen by X sq. m and increase the kitchen, care and grooming staff by X people, so that the conditions of food intake is adequate.
- ABSTEP Subproject is to build closed channels and channel wastewater from X number of houses, and do the work necessary for final disposition, etc.

iv. **Benefits and Beneficiary Population during Execution:** Summarize the benefits to be received by the population directly affected by ABSTEP Subproject. For some cases, this information is directly related to the change in the situation presented in the section on "Situation to Change with ABSTEP Subproject," but in other direct benefits may be more. In all cases, the group directly affected must be explained. Some examples are:

- 25 families living in the conservation area, will be directly benefit from ABSTEP Subproject, not only through changing environmental conditions, but also from the optimization of production systems and improved access to renewable natural resources.
- 30 children will benefit from improvements in the conditions of the soup kitchen and the food they receive, and 20 additional children have access to the dining room because of the expansion.

- 20 families in the community receive the benefits of the wastewater pipeline and the risk of disease to about 80 children who inhabit the area is reduced.

In the case of some environmental projects in which the direct beneficiaries are not immediately identifiable, populations or communities that receive the benefits may be indicated. For example, for the protection of water sources for waterworks in which beneficiaries are the users of such waterworks.

- v. **Schedule of Key Activities:** Based on the description of ABSTEP Subproject, identify the main activities (not more than 5) and the expected duration for execution during the six (6) months of the project duration. Some examples are: (a) infrastructure: i) excavation and foundation, ii) masonry, and iii) construction of toilets; and (b) for cleaning up beaches and mangroves: i) drainage, ii) cleaning, iii) tree planting, and iv) training.

The guidelines to be considered for the preparation of environmental issues are presented in the preceding section E. Environmental Issues.

#### **(e) Environmental Issues**

In this section, we try to identify the possible effects or negative or positive environmental impact that can be generated by ABSTEP Subprojects. Since Antigua and Barbuda has its own policy, environmental laws and regulations, ABSTEP Subprojects should consider these. If ABSTEP Subproject requires an environmental permit or certificate, the relevant authority, shall provide such permit or certificate.

Even if the types of subprojects under the TEP are generally of low environmental risk, the points presented below, should at least be reviewed.

Whereas the project must be of community interest, the preparation process should involve the beneficiaries. The events to facilitate consultation and participation should be described as indicated in Section D above.

- i. **Does the ABSTEP Subproject Affect Water Resources?** Responses will be marked with an **X** to indicate **Yes or No**. If **yes**, explain management measures to be taken to mitigate these effects or measures to improve the conditions of the sources. For example, the case of access paths can affect streams, for which the mitigating measures must be explained. Or, if a new water supply will be required, then this should also be indicated as a potential impact.

- ii. **Management of Debris and Waste Generated by the Construction of ABSTEP Subprojects:** In general, during the construction of ABSTEP Subprojects, especially infrastructure, common risks include the invasion of public spaces (green areas or water sources) or improper disposal of rubble and construction waste. In the case of ABSTEP Subprojects that have this situation, explain how the waste will be handled.
- iii. **Management of Waste Water Generated by ABSTEP Subprojects:** For ABSTEP Subprojects involving expansion of coverage or other services that generate new flows of wastewater, explain whether the existing system is sufficient for the disposal and management of these flows, or whether measures are taken to prevent improper disposal. For example, caution should be exercised in cases where there are septic tanks whose capacity and duration is limited and can be altered with increasing flow.
- iv. **Effects on Public Space:** Explain whether during construction or operation of the subproject, if public spaces such as sidewalks, streets, parks, roads, access to sources of water may be affected, and the relevant mitigating measures. In the case of ABSTEP Subprojects that lead to better conditions in these areas, explain these conditions.
- v. **Impact on Air Quality:** Explain whether during construction or operation of ABSTEP Subproject, if noise, dust or particulate emissions that may affect the air are generated. In the case of extensions or repairs to infrastructure, explain what will be used during construction so as not to affect the environmental conditions of the users of the site.
- vi. **Effects on the Soil:** Explain if ABSTEP Subproject may affect green areas, protected areas, or native flora. For example in the case of rural roads, soils can be affected. Also in the case of sewage projects, there may be risk of contamination of soils.
- vii. **Adverse Environmental Hazards:** Describe the potential risks of ABSTEP Subprojects in terms of general conditions for the population, such as reduced ventilation or lighting, odors, etc. This is to prevent deterioration in environmental conditions for users of the projects. This is especially true in cases of ABSTEP Subprojects to expand education, health or social infrastructure. It should accommodate the risk of people's loss of comfort.
- viii. **Impact to Natural Habitat, Physical Cultural Resources, or Pest Management Issues:** If the project has any of these potential effects, use the guidelines in Annex B, C, and/or D to develop an EMP specific to the proposed activity. If there is already an existing, established set of environmental procedures for a particular project, then those can be adapted to form the EMP specific to the temporary ABSTEP workers. The EMP for these activities must be disclosed to the public and a consultation workshop held and

documented to ensure that any public concerns or comments are recognized and addressed.

**(f) Organization for Performance**

- i. **Alliances with Other Institutions:** If the LO has some alliances, whether financial, technical or operational support. Explain who is included in the alliance for ABSTEP Subprojects and the type of alliance;
- ii. **Personnel Assigned to the Project:** Identify the number of staff, different to ABSTEP beneficiary workers, assigned by the LO for implementation of the ABSTEP Subproject.

**(g) Information on ABSTEP Beneficiary Workers**

The LO is required to:

- i. Submit the number of workers to contribute unskilled labour to implementation of the subproject.
- ii. Submit the number of trainers that will provide required training to workers
- iii. Describe how training will be organized and where it will be taught
- iv. Draft the weekly schedule for training of workers
- v. Draft the daily time scheduled for training (hours) and total hours.

**(h) ABSTEP Subproject Costs**

Identify the total costs of ABSTEP Subproject according to the major cost items as presented in the *Table 6: Cost Items* below. If the cost of ABSTEP subproject is funded by various bodies and institutions, include the details in the necessary columns. This format presents the contribution of ABSTEP, the LO and any other potential funder, which in many cases may be the community. Costs will be expressed in Eastern Caribbean dollars (EC\$) and in round figures.

<b>Cost Item</b>	<b>ABSTEP</b>	<b>LO</b>	<b>Other(s)</b>	<b>Total</b>
<b>Materials and Supplies</b>				
Training Supplies and Materials				
Project Supplies, Tools and Equipment				
<b>Personnel</b>				
Technical				
Training				
Unskilled Labour				
<b>Administrative</b>				
<b>Total Cost</b>				

**(i) Operation and Maintenance**

This information is intended to determine whether the ABSTEP subproject, once constructed or implemented, will be operated, used and maintained properly. For example, for expansion of education infrastructure, with the objective of expanding coverage, you must ensure that the responsible institution receiving the equipment agrees with the LO to guarantee its use. In the event that the receiving institution is the LO, this will apply to agreed spaces under the operation and maintenance of the ABSTEP Subproject.

**5.2. Evaluation**

This section solicits general information about the possible environmental impact of the ABSTEP Subproject in order to identify the type of information required for the themes related to the potential environmental risks, taking into account those mentioned in this Environmental Framework.

The evaluation process has the aim to determine the viability of the ABSTEP Subproject for approval. This feasibility is comprised of the following components:

- Technical Feasibility
- Institutional Viability
- Environmental Sustainability
- Financial Viability

The environmental viability determined by the Labour Department reviews information submitted on ABSTEP subproject especially that related to Sections C and E of 5.1, above. This review will follow the guidelines detailed in *Table 7: Guidelines for Environmental Sustainability*, below. Any project which is found to not be environmentally viable will be excluded from consideration as an ABSTEP Subproject, because such project would be

considered environmentally complex and so would require more exhaustive and extensive permitting, which would not be in keeping with the goals of ABSTEP.

The LDTU will carefully review the environmental viability guideline information for every subproject proposed under ABSTEP, and will conduct field verifications to get additional information as necessary to clarify any uncertainties. The LDTU will also consult with the Department of Environment as necessary for assistance with determinations of environmental viability where there is any question about particular circumstances or information needs.

Additional screening criteria may be added to Table 7 as necessary.

<i>Table 7: Guidelines for Environmental Sustainability</i>			
<b>1. Based on the review of activities and goals of ABSTEP Subproject(Section C)</b>			
	Yes	No	Not Applicable
1.1 Do some of the proposed activities have negative environmental impact?			
1.2 Does the project require an environmental permit or government approval?			
1.3 Was the documentation required for the permit or approval submitted?			
1.4 Does the project require a prior field visit to assess the surrounding environment?			
If you did visit, were risks identified?			
- Are there risks of flooding?			
-Instability of soils?			
-Are there nearby water bodies, wetlands or fragile ecosystems?			
- Are there areas of vegetation that may be affected by the project?			
1.5 Does the project involve pest management issues, or possible impact to natural habitat or physical cultural resources? - If so has a separate EMP been prepared? - Has the public been consulted on the EMP?			
<b>2. Based on the review of environmental aspects (Chapter V)</b>			
2.1 Are potential environmental risks identified?			
2.2 Are these risks appropriate to the activities of projects?			
2.3 Are there other risks not identified?			

<i>Table 7: Guidelines for Environmental Sustainability</i>			
<b>1. Based on the review of activities and goals of ABSTEP Subproject(Section C)</b>			
2.4 Are the actions taken to mitigate the risks explained?			
2.5 Are these actions appropriate?			
Evaluator Assessment: 1. Explain if the project requires a previous visit, why. 2. Explain potential environmental risks not covered by the Environmental Framework 3. Explain the requirements of adjustments (if any) 4. General assessment:			
Environmental Viability	Positive _____	Negative _____	Requires Adjustments _____

### **5.3. Department of Environment in the Ministry of Health and the Environment**

The Department of Environment is responsible for the management of environmental issues. The Labour Department, through the LDTU, will request technical support from the Department of Environment, if the LDTU has questions or needs to verify the potential impact identified by the LO, or to review the proposed mitigation measures and the feasibility environment.

### **5.4. Monitoring ABSTEP Subprojects**

The LDTU will visit each ABSTEP Subproject at least twice during its execution. In this process, the LDTU will review compliance with all elements and guidelines that form part of the approved project. Technical assistance from the Department of Environment will be requested as necessary.

The LDTU will review the technical aspects of the project (related to the objective, scope and goals), and environmental issues through a compliance checklist in coordination with the Department of Environment. The topics under the environmental aspects as detailed in *Table 8: Guidelines for Monitoring Environmental Aspects*, below will be reviewed as part of the overall supervision of ABSTEP Subprojects:

<i>Table 8: Guidelines for Monitoring Environmental Aspects</i>
Is the project located in the target area?
Is the removal and disposal of debris adequate?
Are public spaces affected?
Have the predicted environmental risks taken place?

Have steps have been taken to prevent, mitigate or compensate?
Are the environmental conditions suitable for beneficiaries?
Have environmental risks been detected other than those predicted?
Have occupational health and safety measures been implemented?
Do the works follow the special EMPs for pest management, natural habitats, and/or physical cultural resources (if applicable)?
General overview on environmental issues:

The LDTU may develop additional compliance checklists for specific subprojects if they are merited. These checklists may be developed with assistance from the Department of Environment.

The most relevant environmental information obtained during the project cycle of ABSTEP Subprojects will be included in the monitoring and evaluation system of the subproject. This monitoring and evaluation will determine the feasibility of implementing the subproject in other areas of Antigua and in Barbuda, and determine the required adjustments to optimize the procedures and the achievement of objectives.

### **5.5. Institutional Responsibility**

The direct responsibility for compliance with the environmental aspects of the project lies with the Labour Department. It will implement the criteria and guidelines established in this Environmental Framework and ensure proper implementation of standards.

During project implementation the LDTU will visit each subproject at least once monthly during its execution. The LDTU, in coordination with the DoE, will review the technical aspects of the subproject and environmental issues through a compliance checklist and other analysis as necessary.

## **ANNEX A: Related Legislation and Policies**

### **Local**

The following laws can be accessed through the official website of the Government of Antigua and Barbuda, [www.ab.gov.ag](http://www.ab.gov.ag) or the individual links provided below.

1. [Antigua and Barbuda Labour Code, Division D](#)
2. [Antigua Public Utilities Act](#)
3. [Beach Control Act](#)
4. [Beach Control Protection Act](#)
5. [Disaster Management Act](#)
6. [Dumping At Sea Act](#)
7. [Environmental Protection and Management Act](#)
8. [Fisheries Act](#)
9. [Forestry Act](#)
10. [Litter Act](#)
11. [Marine Areas \(Preservation and Enhancement Act\)](#)
12. [Maritime Areas Act](#)
13. [National Parks Act](#)
14. [National Solid Waste Management Authority](#)
15. [Noise Abatement Act](#)
16. [Oil Pollution of Marine Areas Act](#)
17. [Pesticides and Toxic Chemicals Act](#)
18. [Plant Protection Act](#)
19. [The Physical Planning Act](#)
20. [The Public Health Act](#)

### **World Bank**

21. [World Bank Environmental, Health and Safety Guidelines](#)
22. [World Bank Safeguard Policies](#)

## ANNEX B. GUIDANCE FOR PROJECTS AFFECTING NATURAL HABITAT

**Policy Background.** Operational Policy 4.04 (Natural Habitats) seeks to ensure that World Bank-supported infrastructure and other development projects take into account the conservation of biodiversity, as well as the numerous environmental services and products which natural habitats provide to human society. The policy strictly limits the circumstances under which any Bank-supported project can damage natural habitats (land and water areas where most of the native plant and animal species are still present). Specifically, the policy prohibits Bank support for projects which would lead to the significant loss or degradation of any Critical Natural Habitats, whose definition includes those natural habitats which are either (i) legally protected, (ii) officially proposed for protection, or (iii) unprotected but of known high conservation value. In other (non-critical) natural habitats, Bank supported projects can cause significant loss or degradation only when (i) there are no feasible alternatives to achieve the project's substantial overall net benefits; and (ii) acceptable mitigation measures, such as compensatory protected areas, are included within the project.

**Guidance for preparing EMPs.** If it is determined that a subproject within ABSTEP may potentially affect natural habitat, then a special EMP must be developed and applied. The EMP should be consistent with and adhere to the policy background information above. Most projects involving natural habitat under ABSTEP will be to support existing plans or programmes already being undertaken by the National Parks or other agency. In these cases, the EMP should be adapted from the existing procedures and plans of the supervising agency. In addition, all works should be done under the supervision of the National Parks or relevant authority who is conducting the programme.

One example of works which may affect natural habitat is that of trail restoration or maintenance. For these types of projects, the EMP would address possible impact such as not allowing the creation of new trails, cutting of vegetation or trees that are protected, avoiding erosion and properly channeling runoff waters, and so forth. The EMP would be taken from existing guidelines, procedures, and requirements from the existing plan or programme already being undertaken, and would be carried out under the direct guidance and supervision of the implementing agency (in this case, National Parks).

The EMP should reference the standard generic mitigation measures in the EMF section 4.3 and 4.4, as well as the following information specific to work in areas where natural habitat is a factor:

- Background and discussion of larger works programme
- Description of types of works and tasks being undertaken
- Training specific to temporary workers
- Supervision by NPA, Environment Department, or other relevant agency
- Access, ingress and egress to protected sites
- Health and Safety specific to the site and activities
- Sensitive ecosystems or areas to avoid disruption
- Protected or sensitive species

If there is no EMP then one would need to be developed from scratch in accordance with the policy; in this way, only those projects are favoured which are already approved, established and underway. As well, if there is some kind of new project proposed with potential impact to natural habitat, then an Environmental Impact Assessment and relevant permitting procedures would need to be followed. As this would be time-consuming and complex, the process favours those projects with low impact and which are already approved, established and underway.

It must be underscored that any possible subproject which could affect critical natural habitat is not eligible under ABSTEP. As well, any project which could result in significant loss or degradation to natural habitat would not be eligible under ABSTEP, because it would be a Category A project.

It should also be emphasized that any projects involving forests, such as harvesting of forest resources or projects that may change the use or management of forest resources, are excluded from ABSTEP projects (see section 4.1).

Finally, an EMP developed under these guidelines should be disclosed to the public, and a consultation or workshop conducted to solicit public input. Any comments received should be documented as an Annex to the EMP, along with a discussion of the manner in which the EMP was changed to address those comments.

## ANNEX C. GUIDANCE FOR PROJECTS AFFECTING PHYSICAL CULTURAL RESOURCES

**Policy Background.** The Physical Cultural Resources Policy (OP4.11) addresses physical cultural resources, which are defined as movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Physical cultural resources may be located in urban or rural settings, and may be above or below ground, or under water. Their cultural interest may be at the local, provincial or national level, or within the international community. Physical cultural resources are important as sources of valuable scientific and historical information, as assets for economic and social development, and as integral parts of a people's cultural identity and practices. The Bank assists countries to avoid or mitigate adverse impact on physical cultural resources from development projects that it finances. The impact on physical cultural resources resulting from project activities, including mitigating measures, may not contravene either the borrower's national legislation, or its obligations under relevant international environmental treaties and agreements.

**Guidance for preparing EMPs.** If it is determined that a subproject within ABSTEP may potentially affect physical cultural resources, then a special EMP must be developed and applied. The EMP should be consistent with and adhere to the policy background information above. Most projects involving natural habitat under ABSTEP will be to support existing plans or programmes already being undertaken by the National Parks or other agency. In these cases, the EMP should be adapted from the existing procedures and plans of the supervising agency. In addition, all works should be done under the supervision of the National Parks or relevant authority who is conducting the programme.

One example of works which may affect physical cultural resources is that of historic wall stabilization, or restoration of historic buildings. Clarence House is one such project which is already underway by National Parks and is a site of great cultural and historic relevance to the island of Antigua. Another case involves clearing and stabilization of walls on the island of Barbuda. In these types of projects, the EMP would address possible impact such as inadvertent damage to historic structures, conflicts over land use, or loss of artifacts. The EMP would be taken from existing guidelines, procedures, and requirements from the existing plan or programme already being undertaken, and would be carried out under the direct guidance and supervision of the implementing agency (in these cases, National Parks).

The EMP should reference the standard generic mitigation measures in the EMF section 4.3 and 4.4, as well as the following information specific to work in areas where physical cultural resources are a factor:

- Background and discussion of larger restoration programme
- Description of types of works and tasks being undertaken
- Training specific to temporary workers
- Supervision by NPA or other relevant agency
- Access, ingress and egress to protected sites
- Health and Safety specific to the site and activities

If there is no EMP then one would need to be developed from scratch in accordance with the policy; in this way, only those projects are favored which are already approved, established and underway. As well, if there is some kind of new project proposed with potential impact to natural habitat, then an Environmental Impact Assessment and relevant permitting procedures would need to be followed. As this would be time-consuming and complex, the process favors those projects with low impact and which are already approved, established and underway.

Finally, it should be noted that in all cases of works involving excavation or earth moving, a “chance find” procedure must be in place, as follows:

“If, during the execution of the activities contained in this contract, any material is discovered onsite which may be considered of historical or cultural interest, such as evidence of prior settlements, native or historical activities, evidence of any existence on a site which may be of cultural significance, all work shall stop and the supervising contracting officer shall be notified immediately. The area in which the material was discovered shall be secured, cordoned off, marked, and the evidence preserved for examination by the local archaeological or cultural authority. No item believed to be an artifact must be removed or disturbed by any of the workers.”

Finally, an EMP developed under these guidelines should be disclosed to the public, and a consultation or workshop conducted to solicit public input. Any comments received should be documented as an Annex to the EMP, along with a discussion of the manner in which the EMP was changed to address those comments.

## ANNEX D. GUIDANCE FOR PROJECTS INVOLVING PEST MANAGEMENT

**Policy Background.** Operational Policy 4.09 on Pest Management seeks to ensure that projects avoid using harmful pesticides. A preferred solution is to use Integrated Pest Management (IPM) techniques and encourage their use in the whole of the sectors concerned. The Bank requires that any pesticides it finances be manufactured, packaged, labeled, handled, stored, disposed of, and applied according to standards acceptable to the Bank. The Bank does not finance formulated products that fall in WHO classes IA and IB, or formulations of products in Class II, if (a) the country lacks restrictions on their distribution and use; or (b) they are likely to be used by, or be accessible to, lay personnel, farmers, or others without training, equipment, and facilities to handle, store, and apply these products properly.

**Guidance for preparing EMPs.** Any subproject that will use or purchase pesticides, herbicides, or other pest control agents will require a special EMP. The EMP should be consistent with and adhere to the policy background information above. The types of subprojects can be divided into three categories: those with minimal or incidental pesticide use; those in which some exposure to pesticides is a potential risk to be actively managed; and those in which significant amounts of pesticides may be used or purchased. The EMPs will differ for each type of subproject, as described below.

For the majority of subprojects considered in ABSTEP, for example building construction or rehabilitation, pesticides will not be used, or only small amounts may be used for such activities as extermination or termite foundation treatments. These are considered subprojects with inimical or incidental pesticide use. For these routine activities, the following procedures would apply as a standard or generic minimum EMP:

- Any use of pesticides shall be approved by the contracting officer and shall conform to the manufacturers' recommendations for use and application.
- Any person using pesticides shall demonstrate that they have read and understood these requirements and are capable of complying with the usage recommendations to the satisfaction of the contracting officer.
- All pesticides to be used shall conform to the list of acceptable pesticides that are not banned by the relevant local authority.
- If termite treatment or vector control treatment is to be utilized, ensure appropriate chemical management measures are implemented to prevent contamination of surrounding areas, and use only licensed and registered pest control professionals with training and knowledge of proper application methods and techniques.

It is also possible that some ABSTEP Subprojects may involve pest management in the role of supporting existing plans or programmes already being undertaken by the Ministry of Agriculture, Environment Department, or other agency. Those are considered subprojects in which some exposure to pesticides is a potential risk to be actively managed. In these cases, the EMP should be adapted from the existing procedures and plans of the supervising agency. In addition, all works should be done under the supervision of the Ministry of Agriculture, Environment Department, or relevant authority who is conducting the programme.

One example of works which may involve pest management is the control and eradication programme for the Giant African Land Snail. The Government has been addressing the problem since 2008 and in 2015 the Ministry of Agriculture's Chief Plant Protection Officer attended training in Miami-Dade County, where years of experience have kept the pest in check. Most work involves accurate monitoring and observation, as well as community involvement in reporting and collecting the snail, but eradication is also pursued by using bait stations with iron phosphate and metaldehyde. There have been a number of EIAs and studies in Florida that will provide guidelines and the basis for an EMP, and another set of guidelines have also been published by the U.S. Department of Agriculture.<sup>1</sup> Caution and consideration must be given in regard to potential impacts to non-target native species of snails and invertebrates if pertinent.

Other subprojects that could involve pest management issues include termite treatment for building foundations, extermination or fumigation of buildings, or use of pest control agents in the Botanical Gardens, if needed. In these cases the EMP would be taken from existing guidelines, procedures, and requirements from the existing plan or programme already being undertaken, and would be carried out under the direct guidance and supervision of the implementing agency (in these cases, Ministry of Agriculture or Environment Department).

The EMP for these subprojects in which some exposure to pesticides is a potential risk to be actively managed should reference the standard generic mitigation measures in the EMF section 4.3 and 4.4, as well as the following information specific to pest management:

- Background and discussion of larger pest control or eradication programme
- Description of types of works and tasks being undertaken by temporary workers
- Training specific to temporary workers
- Supervision by Agriculture, Environment, or other relevant agency
- Specific information on pesticides being used:
  - Type of pesticide
  - Packaging, labeling, and storage precautions
  - Handling, transport, application, and disposal information
  - Protective gear and application equipment, if applicable
- Reporting in case of spills or accidents

If there is no EMP then one would need to be developed from scratch in accordance with the policy; in this way, only those subprojects are favoured which are already approved, established and underway. As well, if there is some kind of new subproject proposed with potential impact to natural habitat, then an Environmental Impact Assessment and relevant permitting procedures would need to be followed. As this would be time-consuming and complex, the process favours those subprojects with low impact and which are already approved, established and underway.

The Bank requires that any pesticides it finances be manufactured, packaged, labeled, handled, stored, disposed of, and applied according to standards acceptable to the Bank. The Bank does

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<sup>1</sup><https://extension.entm.purdue.edu/CAPS/pdf/datasheets/GiantAfricanLandSnail.pdf>

not finance formulated products that fall in WHO classes IA and IB, or formulations of products in Class II, if (a) the country lacks restrictions on their distribution and use; or (b) they are likely to be used by, or be accessible to, lay personnel, farmers, or others without training, equipment, and facilities to handle, store, and apply these products properly.

Finally, it should be noted that if a subproject will involve the significant use or purchase of pest control agents, then a separate Pest Management Plan (PMP) would need to be developed. A pest management plan is a comprehensive plan, developed when there are significant pest management issues such as:

1. New land-use development or changed cultivation practices in an area;
2. Significant expansion into new areas;
3. Diversification into new crops in agriculture, particularly if these tend to receive high usage of pesticide, like cotton, vegetables, rice, etc.;
4. Intensification of existing low-technology systems;
5. Proposed procurement of relatively hazardous pest control products or methods;
6. Specific environmental or health concerns (e.g., proximity of protected areas or important aquatic resources; worker safety).

Integrated Pest Management (IPM) should be followed when developing a pest management plan, as referenced in the World Bank Operational Policy OP4.09. Any use of pesticides should also be consistent with FAO International Code of Conduct on Pesticide Management and corresponding guidelines.<sup>2</sup>

A pest management plan is also developed when proposed financing of pest control products represents a large component of the subproject. The determination of whether or not a Pest Management Plan should be prepared is whether or not the subproject would involve procurement of pesticides or pesticide application equipment (either directly through the project, or indirectly through on-lending, co-financing, or government counterpart funding), and whether the subproject may (i) lead to substantially increased pesticide use and subsequent increase in health and environmental risk, (ii) maintain or expand present pest management practices that are unsustainable, not based on an IPM approach, and /or pose significant health or environmental risks. This situation is not anticipated for ABSTEP, since most temporary labor activities will center on monitoring, data collection, and reporting, and not on actual purchase or use of chemical agents.

Finally, an EMP developed under these guidelines should be disclosed to the public, and a consultation or workshop conducted to solicit public input. Any comments received should be documented as an Annex to the EMP, along with a discussion of the manner in which the EMP was changed to address those comments.

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<sup>2</sup> [http://www.fao.org/fileadmin/templates/agphome/documents/Pests\\_Pesticides/Code/CODE\\_2014Sep\\_ENG.pdf](http://www.fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/Code/CODE_2014Sep_ENG.pdf)

## ANNEX E. RECORD OF PUBLIC DISCLOSURE AND CONSULTATION

In the preparation of this revised Draft of this EMF, consultations were held during the first two weeks of June 2016 by requesting input from the Department of Environment, and from local experts on historic restorations, national parks, and the Plant Protection Unit of the Ministry of Agriculture. This feedback fed into the revised Draft document which was then disclosed for public consultation on the Government of Antigua and Barbuda web portal ([http://www.ab.gov.ag/notice\\_page.php?page=37](http://www.ab.gov.ag/notice_page.php?page=37)) on 4<sup>th</sup> July 2016.

The Draft EMF was resubmitted to the key stakeholders for final review, and accompanied by a public notification to provide comments. Persons were invited to submit comments no later than 15<sup>th</sup> July 2016. Additionally, the draft document was emailed to the following key individuals, Community Groups, Agencies and Ministries:

Mrs. Diann Black-Layne, Chief Environment Officer, Department of Environment, Ministry of Health and the Environment

Dr. Janil Gore-Francis, Chief Plant Protection Officer, Ministry of Agriculture, Lands, Fisheries and Barbuda Affairs

Mr. Frederick Southwell, Chief Town and Country Planner, Development Control Authority

Mr. Clarence Pilgrim, Chairman, Pesticides and Toxic Chemicals Control Board

Dr. Reginald Murphy, Manager, Heritage Resources, National Parks

Mrs. Helena Jeffery-Brown, Sr. Environment Officer, Department of Environment

Mr. Ato Lewis, Sr. Environment Officer, Department of Environment

The result was that additional comments were not received from any of the Agencies or individuals that the document was emailed to. Comments were not received from the public based on the website disclosure. Additional comments were received through the World Bank reviewers and these were incorporated into this final document.

Evidence of disclosure and consultation appears on the following pages.

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## ABSTEP Environmental Management Framework

### ENVIRONMENTAL MANAGEMENT FRAMEWORK GUIDELINES

The Labour Department in the Ministry of Legal Affairs, Public Safety and Labour is implementing the Antigua and Barbuda Skills Training and Empowerment Programme (ABSTEP), an Active Labour Market Programme. A component of ABSTEP is the Temporary Employment Programme (TEP), which aims to improve the employability and income of individuals between 17-50 years of age. ABSTEP-TEP is implemented in partnership with local organizations, which execute small public service and community interest projects. The implementation of ABSTEP-TEP sub-projects may have a negative environmental impact. To this end, negative environmental impacts must be assessed and evaluated. Additionally, any remedial actions to

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**ABSTEP ENVIRONMENTAL MANAGEMENT FRAMEWORK**

The General Public is invited by the **Labour Department Antigua/Barbuda** to provide comments and express concerns, before July 15, 2016, regarding the provisions of the Environmental Management Framework for ABSTEP'S Temporary Employment Programme. Any input on this document can be sent via e-mail to [abstep@ab.gov.ag](mailto:abstep@ab.gov.ag).

This document establishes the framework to evaluate ABSTEP's sub-project proposals, jointly with the mitigation actions. It aims to ensure that ABSTEP sub-projects are in line with local legislation and the minimum standards defined by the World Bank for this type of activity.

The Temporary Employment Programme aims to improve the employability and income of individuals between 17-50 years of age. Click here for more information about the document [http://www.ab.gov.ag/notice\\_page.php?page=37](http://www.ab.gov.ag/notice_page.php?page=37)

**Government of Antigua and Barbuda**  
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**VIDEOS**




**NOTES**

**FREQUENTLY ASKED QUESTIONS (JOB-SEEKE...**  
January 26, 2015

**VISITOR POSTS**

 ABSTEP EMF - revdraft2...  
221 KB

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Dear All:

The Labour Department ABSTEP Programme is going through a restructuring. The list of eligible sectors that can participate in the Temporary Employment Programme has been widened. As a result, the Environmental Management Framework (EMF) was revised.

The Advisory Committee of the World Bank has given approval to revise the said EMF. However, under the Bank's rules we are required to publish the EMF to solicit any further input from those organisations that were consulted during the drafting of the revision. Other members of the public are also being asked to submit any comments.

I would appreciate it if you could review the attached EMF and if you have any further comments please send them to email address [abstep@ab.gov.ag](mailto:abstep@ab.gov.ag) on or before July 8, 2016.

*Pascall Kentish*

F. Pascall Kentish  
Assistant Labour Commissioner  
Department of Labour  
Antigua and Barbuda

 ABSTEP EMF - revdraft2...  
221 KB

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Dear All:

The attached Environmental Management Framework (EMF) was sent yesterday for your final review and comments. The deadline date for the submission of comments was set at July 8, however, this date has been revised and the new deadline date for the submission of your comments is **July 15, 2016**.

We look forward to any comments you may have regarding the revised Environmental Management Framework (EMF).

If you know of any other entity that may be interesting in commenting on the EMF, you can pass it on to them and ask them to send their comments to [abstep@ab.gov.ag](mailto:abstep@ab.gov.ag).

*Pascall*

F. Pascall Kentish  
Assistant Labour Commissioner