Audit - application of environmental, social and occupational health and safety mitigation and monitoring measures

Caracol industrial park – Haiti

# EXECUTIVE SUMMARY

The Caracol Industrial Park (PIC) has been established since 2012 in the northeastern region of Haiti, 25 km from the city of Cap-Haitian. After several expansion phases, the Inter-American Development Bank (IDB) in partnership with the Technical Execution Unit (UTE) wished to assess the implementation of the mitigation and monitoring measures established in the various assessment as well as in existing environmental, social and health and safety management programs (PGESSS).

Tetra Tech QI inc. (Tetra Tech) obtained the mandate to carry out this audit. In the current global context of the COVID-19 pandemic, some of the Tetra Tech experts located in Canada were unable to come to the site to carry out the verifications and interviews. The findings of this fit-for-disclosure audit report are therefore based on the documentary review, interviews conducted by videoconference and by a short field visit by our local resources. Visits to the PIC are planned for the next few weeks to confirm or refute some of the findings.

The scope of the audit integrates the environmental, social and health and safety aspects of the PIC.

The findings of the audit break down as follows:

|  |  |  |  |
| --- | --- | --- | --- |
|  | Non-conformity | Observation | Improvement opportunity |
| Environment | 20 | 19 | 5 |
| Social | 9 | 12 | 1 |
| Health-Safety | 5 | 4 | 1 |

From a general point of view, the main findings are related to the documentation framing the activities of the CIP in the area of ​​environmental, social and health and safety management. If the basic structure is present, namely the PIC rules and regulations, and an Environment, Health and Safety (EHS) manual, it should be noted the absence of a large number of procedures provided for in this manual, and an absence of up-to-date documentation which sometimes makes it difficult to apply and implement.

Regarding the PIC staff dedicated to environmental, social and health and safety issues, several positions have been vacant for several months. This reduces the ability to monitor tenant activity and train workers and surrounding populations. It is important to ensure that key positions are filled by competent people to ensure compliance with expected follow-up measures.

If verification measures are implemented with regard to tenant activities, PIC EHS staff do not have sufficient means to enforce park rules and regulations. We can note the discharge of wastewater into the PIC network by the company Everest without it having been authorized.

From an environmental point of view, the main issues raised on this subject in the context of this audit are:

* Management of both common and hazardous waste, with the absence of a viable long-term solution for all types of waste produced.
* Management of the water supply with faulty installations and data between the quantities pumped and the quantities consumed tending to demonstrate a high rate of leakage or poor monitoring of the water actually consumed.
* The protection of the banks of the river which bear witness to erosion problems. This situation is amplified by illegal use by certain individuals who cultivate there and who collect sand to make construction materials upstream of the park.
* At the wastewater treatment plant, some treatment processes no longer work and the solutions envisaged do not seem to be well mastered by the staff of the plant.
* With regard to environmental emergencies, there is no document governing them, which does not guarantee effective interventions in the event of spills or other emergencies.

In addition, certain issues are not covered by environmental and social impact assessment or the ESMPs, such as the issue of air quality with monitoring of tissue incinerators and diesel boilers or of greenhouse gas emissions. There is also no mention of the risks associated with natural disasters, so these issues are not always found in the PIC documentation.

From a social point of view, the main issues are:

* The identification of vulnerable populations and the measures put in place to ensure their access to PIC jobs and safe conditions in and around the PIC.
* The safety of women from physical and sexual assault in PIC facilities and in transport.
* Transport management where 25% of workers reside in regions that are not served by the PIC transport network.
* Regarding the social development of the area, no social investment plan has been put in place to guarantee an improvement in the quality of life for the entire neighboring population.

And finally, in terms of health and safety, the main issue concerns:

* The lack of staff of the EHS team of the PIC which reduces the capacity to carry out checks and to give training in health and working conditions (no training given for several months).

The initial documents such as the environmental and social impact assessments as well as the various ESMPs provide few measures to be respected in terms of occupational health and safety.

The PIC project is framed by four policies in terms of environmental, social, and health and safety protection. Thus, 87 requirements of these policies are applicable to the project. Of this total:

* 55 requirements are adequately covered in the project.
* 28 requirements have been taken into account in the framework of the project, but the related measures are not correctly implemented.
* 4 requirements are not covered by the project.

The assessment of the degree of implementation of these mitigation and monitoring measures shows that overall the policy requirements were met at the time of planning and construction of the project. However, major shortcomings are observed in terms of measures relating to operations and follow-ups. The formulation of mitigation measures for the next PIC expansion operation will need to be more precise for the operation phase in order to better manage these risks.