

# Haiti Social Impact Assessment

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Key Impacts and Recommendations for  
Stakeholders of the Caracol Industrial Park

Prepared for the Unité Technique d'Exécution by the Environmental  
Safeguards Unit (VPS/ESG)

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## I. Caracol Industrial Park: Background and Context

1. The Caracol Industrial Park (PIC, *Parc Industriel du Caracol*) is the result of an unprecedented partnership between the U.S. Government (USGOV), the Government of Haiti (GOH), and the Inter-American Development Bank (IDB). Together, these partners have committed to establishing the necessary infrastructure for a globally competitive 250ha full-service industrial park, including solid waste disposal, state of the art waste water treatment facilities, modern industrial buildings, and the infrastructure necessary to support the integration of PIC into the Northern region. Related investments include accessible roads, new port facilities, reliable supply of electricity and the construction of housing in commuting distance.
2. The garment industry accounts for 90% of Haiti's exports, valued at about US\$ 450 million per year. With 24 factories employing over 25,000 workers, the sector is a potential engine of growth and employment. In 2008 the Haitian Hemispheric Opportunity through Partnership Encouragement Act (HOPE II) was approved by the US Congress and initiated support efforts to expand the industry in Haiti by extending duty-free treatment of textiles, apparel, and other goods until 2018. In addition, the US Congress passed the Haiti Economic Lift Program (HELP) Act in May 2010 in the wake of the January 2010 earthquake. HELP expanded duty free access to the US market for additional Haitian textile and apparel exports, and extended existing trade preference programs for the country through 2020.
3. In January 2011, Sae-A, one of the world's leading garment manufacturers, signed an agreement with the GOH to become the PIC anchor tenant and establish a leading-edge apparel manufacturing complex. Sae-A's investments will create approximately 8,000 permanent jobs over the next three years.
4. Total committed public investments in the project exceed \$100 million. The IDB has provided US\$ 55 million in financing to the Government of Haiti to build factory shells and related park infrastructure through the Haiti Infrastructure Program. Sae-A will contribute \$39.4 million to the project (with financing from the IDB and others). The USGOV will commit approximately \$124 million to power generation and 5,000 new housing units.
5. PIC represents an important economic priority identified by the Government of Haiti to spur job growth and economic opportunity beyond Port-au-Prince. Its location in the north of the country, away from the overcrowded capital of Port-au-Prince, will support the decentralization of development, services, and population. PIC is owned by the Haitian Government's "*Société Nationale des Parcs Industriels*(SONAPI)" and will be managed by a private firm.
6. Such large-scale development carries with it a series of impacts and challenges. PIC will create thousands of jobs, decentralize the population, as well as trigger demand for new services and businesses in the northern region of Haiti. However, it also carries with it a series of social risks with respect to population

influx, security, increased demands for social infrastructure (housing, education, health, among others), and food security, among others.

7. In this context the partners of PIC have developed plans to address the potential impacts on two complementary scales: (1) the Direct Area of Influence (DAI) of PIC, which concerns the natural environment and group of cities directly surrounded and affected by the presence of the Park and; (2) a Regional Area of Influence (RAI) which concerns impacts not immediately apparent, but which over time will irreversibly change the nature of the region. In order to analyze both areas of influence: the Committee for Territorial Development (CIAT), with support from the IDB, will carry out: (1) an Urban Development Plan of affected cities and municipalities; and (2) a Regional Master Plan, extending from Cap Haitien to Ouanaminthe. A regional view will guide the distribution of public services and infrastructure along this corridor, offer guidelines on improving existing economic potential, and provide a framework for future public and private investment.



**Figure 1 Cap Haitien-Ouanaminthe Corridor**

8. The Regional Master Plan is being developed by the IDB, UTE, CIAT, and the American Institute for Architecture (AIA).

9. In this context of technical studies to advance the development of the northern region, the IDB considered it critical to assess the potential social impacts of PIC in order to incorporate appropriate mitigation measures into development plans and investments in the area.

10. In addition, the IDB recently approved the Operational Policy on Gender Equality in Development (OP-270), in which the Bank will seek opportunities to promote gender equality and empowerment through its operations, as well as prevent and mitigate adverse risks of exclusion due to gender in its operations. As part of the Gender Action Plan (GAP) to launch the policy, resources were made

available for the undertaking of Social Impact Assessments (SIAs) during the preparation phase for a select number of innovative projects. As the workforce in PIC will include a high percentage of women, the project presented a unique opportunity to strengthen its gender dimensions, and as a result increase the sustainability of the operation, based on principles of shared value.

11. Shared value can be defined as policies and operating practices that enhance the competitiveness of a company while simultaneously advancing the economic and social conditions in the communities in which it operates.<sup>1</sup> A proactive approach to social issues based on the concept of shared value would help maintain the integrity of the project among local stakeholders and could reduce some of the potential risks to the operation.

## II. Social Impact Assessment: Background and Scope

12. A Social Impact Assessment (SIA) includes processes of analyzing, monitoring and managing the intended and unintended social consequences, both positive and negative, of planned interventions and any social change processes invoked by those interventions. Its primary purpose is to bring about a more sustainable and equitable physical and human environment.

13. This SIA, which was conducted in December 2011, defines the **operationally relevant social and gender impacts and risks** associated with the establishment of the Caracol Industrial Park (PIC). The SIA consisted of a three-phase process that assessed social and gender issues within the context of IDB investments in PIC (including the Haiti Infrastructure Program (HA-L1055) as well as the Sae-A Haiti Investment Plan (HA-L1070)).<sup>2</sup> As mentioned above, the SIA complements a larger context of development in the northern region of Haiti, which involves the coordinated institutional partnership of the IDB, GOH, and USGOV, among many others.

14. **Phase I involved a mission to Haiti to meet with diverse stakeholders and benchmark key issues** within the Industrial Parks CODEVI and SONAPI. Meetings took place with communities affected by the Park project, including the Women Associations (with members from Caracol, Terrier Rouge, Limonade, Trou-du-Nord and Sainte Suzanne), the Association of the Natural Leaders of Caracol and Trou-du-Nord (ALENAC), the Association (ADTC), the Elected Officials of Caracol (mayors, ASEC and CASEC), the representatives of the Chambers of Commerce & Industry of the North-East, the representatives of CODEVI/ Ouanaminthe, the representatives of the CODEVI union, and the food vendors near CODEVI/ Ouanaminthe.

15. **Phase II involved qualitative collaborative research to validate and modify initial reflections as well as prioritize recommendations.** The interviews, surveys and focus groups were conducted with some of the potentially

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<sup>1</sup> Porter, Michael E. and Mark R. Kramer; Harvard Business Review; January 2011.

<sup>2</sup> Upon disclosure of this document, the Sae-A Haiti Investment Plan Project did not proceed for financing through the IDB.

affected social groups (i.e., women and employees) from four surrounding communities of Caracol (Caracol, Trou-du-Nord, Terrier Rouge, and Ouanaminthe)

16. **Phase III involved a mission to visit Sae-A operations in Nicaragua for the purpose of benchmarking an existing Sae-A facility** to understand the relationship between operations, the workforce and the community.<sup>3</sup>

### III. Phase I: Critical impacts anticipated by Local Communities

17. **Issues raised by local stakeholders.** During the meetings conducted in Phase I, stakeholders raised a variety of issues. They shared their concerns, opportunities anticipated, as well as fears and challenges, particularly based on the experience of other industrial parks in the country such as CODEVI in Ouanaminthe, and SHODECOSA and the Metropolitan Industrial Park of SONAPI in Port-au-Prince.

The main issues raised were:

- (1) **Need for ongoing dialogue and consultation** with responsible PIC officials and affected communities. This includes measures to support the full implementation of the Compensation Plan developed under the Haiti Infrastructure Program (HA-L1055), which includes resources to support local stakeholders and communities.
- (2) **Transparency in recruitment** by *EstrellaIngenieria* today and concerns on how the process will continue with Park management and future PIC tenants. Many expressed fear of potential discrimination between foreign and local workers.
- (3) **Training opportunities** so that the local communities can be prepared to compete for both low and high-skilled jobs.
- (4) **Security needs** due to the lack of existing police and security infrastructure, the anticipated population influx and the obvious need to establish a security presence. Particular fears were expressed over the potential negative impacts on the security of women and youth, particularly in the context of the security situation in Cite Soleil, outside the Industrial Park SONAPI.
- (5) **Adequate basic infrastructure** is required e.g., roads, water & sanitation, health, education, housing.
- (6) **Labor conditions** that guarantee that all tenants operating in PIC comply with the core labor standards and the Haiti labor Code program implemented by ILO Better Work. Additionally, the need to prevent potential discrimination between men and women in the workplace, in particular, was expressed.
- (7) **Population Influx and Shantytown Prevention** surrounding the Park noting that, as an example, for every 1 job created in Tipitapa, Nicaragua where Sae-A has current operations, 7 additional people moved to the area. Communities expressed particular fear regarding the potential development of shantytowns outside PIC.

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<sup>3</sup> A VPS/ESG mission to Sae-A Nicaragua took place from December 20-22, 2011.

**(8) Food security, including price, availability and access** as a result of the decreased food production with the installation PIC, the level of poverty of the local population, and the anticipated population influx.

#### **IV. Phase II: Qualitative Research<sup>4</sup>**

18. **Methodology.** The qualitative research phase utilized a collaborative research methodology to gather socio-demographic data and perceptions on critical issues related to PIC impacts. Collaborative research is a process by which researchers, program developers, and community members debate, collaborate, and ultimately move toward processes of social change together. This methodology involved a sample population of 67% females and 33% males from four communities surrounding PIC (Caracol, Ouanaminthe, Terrier Rouge, and Trou-du-Nord).

19. **Research Areas.** Based on an initial participatory diagnosis of key issues for local stakeholders in Phase I (see Section III above), the issues discussed with the sample population included: (i) basic socio-demographic data; (ii) general knowledge of PIC; (iii) food security and availability on site at PIC; (iv) potential areas of training; (v) labor issues and unions; (vi) compensation mechanisms for PIC employees; (vii) gender issues on site such as day care centers and lactation rooms.

20. Based on these surveys, several issues emerged as priorities to consider as recommendations for PIC Stakeholders: GOH, Park Management, PIC Tenants, and the IDB. In line with the collaborative research methodology of the SIA, these final recommendations will be validated with stakeholders in a participatory manner. The most critical issues resulting from the surveys include: (i) Training Plans; (ii) Formal Transportation System for PIC employees; (iii) Operation of the Formal Banking System; and (iv) Child Care.

21. **Training.** Local stakeholders recognize that capacity building and training will increase the competitiveness of the local labor pool. Less than 2% of the local population has vocational or professional training, and very few have experience in the textile industry. However, a majority of those interviewed have the necessary skills to adapt to the needs of the textile industry and other future industry needs in PIC (74% have at least 5 years of schooling). Local stakeholders have already identified two available spaces for training, if material, equipment, and trainers could be provided. Such spaces include the Caritas Center in Jacquesyl/ Caracol and the vocational school in Trou-du-Nord. Stakeholders interviewed supported the decision to train 20 Haitians in Nicaragua, and hope that women will also have opportunities to be trained by Sae-A, the first PIC tenant, and eventually join management staff.

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<sup>4</sup> Additional information on the Qualitative Research phase can be found in the *Rapport Final d'Etude Impact Social et sur les Genres du Parc Industriel de Caracol*.

22. **Transportation Plan.** At present, the population in the Cap Haitien-Ouanaminthe corridor uses the following modes of transportation: pedestrian travel, moto-taxi, tap-taps (informal truck taxis), and commercial buses. However, each week deadly accidents occur throughout this corridor, and many of the people interviewed have lost a relative due to motor accidents. Following the inauguration of the Cap Haitien-Ouanaminthe road in 2008, the *Police National D'Haiti* (PNH) reported more than 150 deaths and hundreds of injuries due to road accidents, unsafe driving practices, and vehicles that do not meet highway safety requirements. Due to the high incidence of accidents, a formal, comprehensive Transportation Plan would provide safety and security along the corridor through: (i) collecting employees at certain key points; (ii) ensuring vehicle and employee safety and traffic during shift collection and drop-off; and (iii) providing codes of conduct for bus drivers.

23. **Formal Banking System (FBS).** Best international practice promotes the formalization of compensation through banking and other credit systems, as cash compensation often leads to risks of violence, theft, and informality. In addition, *Unité Technique d'Exécution* (UTE) has used the FBS to compensate farmers affected by land acquisition for PIC. The majority of the sample population interviewed would prefer payment directly through a bank account (71%) or by check (17%). A collaboration of the IDB, GOH, PIC Tenants and other stakeholders could incentivize the commercial banking sector to open branches and financial services (bank accounts, debit cards and ATM terminals in the northern region of Haiti. Such services would have significant positive socioeconomic impacts which include literacy, savings, formal credit record, and security, among others. The IDB, GOH, PIC Tenants, and Park Management could potentially reach an agreement to compensate workers through the FBS if the Commercial Banking sector agrees to expand services to the PIC site area.

24. **Child Care.** Poverty and population mobility have resulted in a high incidence of young and/or single mothers in the Cap Haitien-Ounaminthe corridor. In addition, as PIC will employ many of these young single mothers, childcare in an area which lacks social services should be a priority for PIC partners (IDB, PIC Tenants, GOH). It is recommended that: (i) Park Management and PIC Tenants provide on-site daycare for children from 0-2 years old, which would be managed by an independent contractor through a competitive bidding process at a cost accessible to employees; and, if this is not possible, that (ii) Park Management and PIC Tenants provide a lactation room with the necessary lighting and refrigeration services for nursing mothers.

## V. Phase III: Site Visit to Sae-A Nicaragua

25. The mission to the Sae-A operation in Nicaragua comprised the third phase of the SIA and had the objective of benchmarking key environmental and social issues within the existing Sae-A facility to gain insight into Sae-A's internal operations and vision, including the environmental and social systems in place, in order to more fully prepare for operations in Haiti, as they will be the flagship tenant in PIC.

26. The team gained invaluable insights in five main areas: (i) Transportation Systems; (ii) Labor Issues; (iii) Health care; (iv) the Sae-A Nicaragua recruitment process and; (v) oversight systems to ensure labor compliance. These issues are taken into account in the final recommendations section.

## **VI. Recommendations for PIC Stakeholders**

27. Based on the three phases of research, a series of recommendations has been made for the various stakeholders: GOH, Park Management, PIC Tenants, and the IDB. These recommendations serve as a starting point for dialogue on many of the critical issues and impacts affecting PIC. The recommendations contained in this SIA must be discussed and negotiated in a participatory and collaborative fashion with the various international, national, regional, and local stakeholders before being converted into actions. In addition, many of the responsibilities for specific stakeholders have yet to be defined, and therefore the recommendations presented in this report could shift as a result of this forthcoming definition.

28. The recommendations are categorized into three components: (Component I) PIC Employment and Labor Issues; (Component II) Local Stakeholders and Community Support; and (Component III) Monitoring and Evaluation.

### **Component I: PIC Employment and Labor Issues**

29. **Labor Laws and Relevant Standards.** A stable, healthy, and productive workforce is enhanced by establishing and maintaining high workplace standards. The Haitian Labor Code<sup>5</sup>, conventions of the International Labor Organization (ILO) and industry best practice form the basis for this recommendation.

- **Recommendation for GOH.** (1) Enforce labor laws and standards at a national level; (2) Support PIC Tenants and Park Management in implementation of such laws and standards.
- **Recommendation for Park Management.** (1) Comply fully with the Haitian Labor Code and internationally recognized standards related to the ILO Declaration on Fundamental Principles and Rights at Work<sup>6</sup>, whichever provides for the greater protection of employees; (2) In addition, regulate labor concerns as part of management functions/grievance mechanism.
- **Recommendation for PIC Tenants.** (1) Comply fully with the Haitian Labor Code and internationally recognized standards related to the ILO Declaration on Fundamental Principles and Rights at Work<sup>7</sup>, whichever provides for the

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<sup>5</sup>Droit du Travail Haitien dated 24 February 1984 as amended.

<sup>6</sup>The ILO Declaration on Fundamental Principles and Rights at Work, adopted in 1998, calls upon Member States to respect and promote these principles and rights in four areas, whether or not they have ratified the relevant Conventions. These categories, or clusters, are: freedom of association and collective bargaining, the elimination of forced or compulsory labor, the abolition of child labor and the elimination of discrimination in employment and occupation. The conventions on which the 1998 Declaration is based are Nos. 29, 87, 98, 105, 100, 111, 138, 182, and they form the reference base in assessing factory compliance with fundamental rights for all the Better Work programs in various countries.

<sup>7</sup> The ILO Declaration on Fundamental Principles and Rights at Work, adopted in 1998, calls upon Member States to respect and promote these principles and rights in four areas, whether or not they have ratified the relevant Conventions. These categories, or clusters, are: freedom of association and collective bargaining, the elimination of forced or compulsory labor, the abolition of child labor and the elimination of discrimination in employment and occupation. The conventions on which the

- greater protection of employees; (2) Regulate labor concerns as part of management functions/grievance mechanism.
- **Recommendation for IDB.** Support and supervise implementation labor laws and standards in PIC.

30. **Better Work Haiti (BWH).** Better Work is an international partnership between the ILO and the International Finance Corporation (IFC) which aims to improve both compliance with labor standards and competitiveness in global supply chains. Additionally, labor standards compliance was included as a prerequisite of the HOPE II legislation. In the future, all PIC tenants can consider joining other international labor associations (such as the Fair Labor Association) and partnerships which offer access to additional training and capacity building in order to provide additional transparency to efforts to comply with high workplace standards and satisfy critical stakeholders.<sup>8</sup>

- **Recommendation for GOH.**Support BWH on a national level in addressing policy and infrastructure needs country wide
- **Recommendation for Park Management.**Allow access of BWH to collaborate with PIC tenants.
- **Recommendation for PIC Tenants.** (1) Obtain an advisory opinion from BWH, in advance of operations, on the adequacy of their respective and procedures related to the workplace; (2) Participates fully in the assessments, capacity building and related programs of BWH; (3) Take proactive steps to correct all noncompliance issues identified in the BWH or other assessment processes in a timely fashion, including the adoption of an accountability management system with senior management to ensure that any noncompliance issues do not reoccur.
- **Recommendation for IDB.** Provide technical assistance as needed.

31. **Hiring Plan.** Multi-year Hiring Plans will support PIC tenants' short and long-term business needs. Current projections indicate that the first PIC tenant (Sae-A), plans to hire approximately 8,000 employees in Phase I of operations (three years). Given the importance of maintaining community stakeholder support for operations amidst transformation of the northern region, it is recommended that no less than 35% of employment opportunities within PIC come from local populations (this includes Caracol, Trou-du-Nord, Terrier Rouge, Fort Liberte, Saint Suzanne, Ferrier, Limonade and Quartier Morin).

- **Recommendation for GOH.** Support Park Management and PIC tenants in providing adequate training, as well as necessary logistics and infrastructure for local communities to access employment.
- **Recommendation for Park Management.** (1)No less than 35% of employment opportunities with Park Management come from local

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1998 Declaration is based are Nos. 29, 87, 98, 105, 100, 111, 138, 182, and they form the reference base in assessing factory compliance with fundamental rights for all the Better Work programs in various countries.

<sup>8</sup> For a listing of the obligations of participation in the Fair Labor Association, see FLA Stakeholder Obligations, <http://fairlabor.org/fla/go.asp?u=/pub/mp&Page=FAQ> or contact Benan Vey, FLA Participating Supplier Manager, email: [bvey@fairlabor.org](mailto:bvey@fairlabor.org), tel: +90-212-2783379

- populations<sup>9</sup>; (2) Support PIC tenants in coordination/implementation of Hiring Plans, as needed.
- **Recommendation for PIC Tenants.** (1) No less than 50% of employment opportunities with PIC Tenants come from local populations<sup>10</sup>; (2) Develop a Hiring Plan will list the number, skills, and experience of needed line assistants, line operators, line supervisors, section managers and plant managers over time. It will also include the number, skills and experience anticipated for food vendors (see also: #34 Food Vendors), factory-based health professionals (see also #33 Health Care Facilities and Health Insurance), Day Care providers, if required, (see also #43 Day Care Center), and necessary personnel required to support other required functions.
  - **Recommendation for IDB.** Support PIC stakeholders in providing priority employment for local populations.

32. **Training Plan.** Training will be an important component for building a base of support for PIC with stakeholders that have the necessary skills but little experience in the textile and other industrial sectors. In addition, local stakeholders have already identified two training centers in the area that could be utilized by PIC tenants for training activities (Caritas Center in Jacquesyl/ Caracol and the vocational school in Trou-du-Nord). Finally, it is recommended that PIC Tenants and Park Management engage the Local Stakeholders Consultative Body (see also #45 LCSB) to determine community training programs that will best support PIC's short- and long-term business needs.

- **Recommendation for GOH.** Support Park management and PIC tenants in developing Training Plan and related training programs.
- **Recommendation for Park Management.** Coordinate screening and access of potential employees, visitors, among others, to PIC tenant sites for training and other related activities.
- **Recommendation for PIC Tenants.** (1) Develop Training Plan that lists the necessary training needs for needed line assistants, line operators, line supervisors, section managers, and plant managers, among others over time. (2) Liaise with CSR Committee/LCSB to disseminate information regarding training opportunities; (3) Provide equipment and personnel for training opportunities.
- **Recommendation for IDB.** Provide technical assistance as needed.

33. **Health Care Facilities and Health Insurance.** Proactive steps to maintain employees' health will be essential to having a reliable and productive workforce. The Haitian Labor Code (Code du Travail) states that each factory employing over 200 employees must be equipped with an infirmary for first aid and emergency care, and that all employees must be affiliated to a healthcare program in order to have access to medical consultations and services at no cost to employees. In addition to OFATMA, there are many NGOs that provide low cost health insurance to factory employees that includes medical consultations, hospitalization,

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<sup>9</sup> Local Populations or Local Communities refers to populations from the following municipalities: Caracol, Trou-du-Nord, Fort Liberte, Saint Suzanne, Terrier Rouge, Ferrier, Limonade and Quartier Morin

<sup>10</sup> Ibid.

prescriptions, laboratory exams, maternity care, and discounted dental care. NGOs such as DASH charge US\$500 month per site and 1US\$/employee/month and require 4-6 rooms on site to provide such comprehensive health care. In addition, DASH has social mission that includes free care for all children of the serviced population (0-5 years).

- **Recommendation for GOH.**(1) Call on OFATMA/NGOs to provide services in PIC; (2) Negotiate terms of installation with provider; (3) Negotiate fee transfer for such services with PIC tenants; (4) Provide physical space on site for health clinic.
- **Recommendation for Park Management.** (1) Collaborate with GOH and other stakeholders to call on OFATMA/NGOs to provide services in PIC; (2) Negotiate terms of installation with provider; (3) Negotiate fee transfer for such services with PIC tenants; (4) Provide physical space on site for health clinic at each PIC tenant factory; (5) Develop emergency protocols for accidents which exceed clinic capacity.
- **Recommendation for PIC Tenants.** (1) Participate in low-cost health insurance scheme as stipulated by law, which covers accidents, preventive care, hospitalization, maternity, among others; (2) Provide physical space for clinic on factory site; (3) Develop emergency protocols for accidents which exceed clinic capacity with Park Management.
- **Recommendation for IDB.** Provide technical assistance as needed.

34. **Food Vendors.** Services such as the provision of healthy meals at an employee canteen can be provided through contracting independent food vendors on site (as is the practice of a future PIC tenant in Nicaragua (Sae-A)). Additionally, other industrial parks in Haiti (such as CODEVI) that lack such services have witnessed the development of unhygienic and unmanaged informal food vendors that place employee and community health at risk. Given discussions with the Northeast Chamber of Commerce during Phase I of the SIA, the private sector is ready and willing to be mobilized in order to contribute to necessary PIC services, both on and off site. Finally, provided that the Formal Banking System has been mobilized (see also #42 Formal Banking System) and in operation, meals can be purchased using the employee's bank card, if available, or payroll deduction (as observed in Sae-A Nicaragua).

- **Recommendation for GOH.** (1) Invite independent food vendors to submit proposals for on-site business; (2) Negotiate with potential vendors to ensure quality, cost, and proper hygienic training; (3) Ensure adequate space available on site for PIC employee canteen.
- **Recommendation for Park Management.** (1) Invite independent food vendors to submit proposals for on-site business; (2) Negotiate with potential vendors to ensure quality, cost (one meal should not exceed market price or 20% of legal minimum base wage), and proper hygienic training; (3) Ensure adequate space available on site for PIC employee canteen.
- **Recommendation for PIC Tenants.** (1) Support Park Management in food allocation/distribution that meets the needs of PIC tenants; (2) Make factory payroll system available for payment of meals to food vendors as deduction

from wages, upon request of employees; (3) Consider own food provision services, if necessary.

- **Recommendation for IDB.** Provide technical assistance to GOH and PIC tenants on food vendor selection, training, cost structure.

35. **Transportation Plan.** Given the high incidence of motor vehicle accidents in the Cap Haitien-Ouanaminthe corridor and the widespread use of unregulated and informal transportation systems, a formal, comprehensive transportation plan for PIC employees will support employee safety, security, and timely arrival/departure, as well as provide a driver for additional private sector growth.

- **Recommendation for GOH.** Support Park Management in developing Transportation Plan.
- **Recommendation for Park Management.** (1) Develop Transportation Plan for PIC employees given current tenant employment projections; (2) Ensure vehicle safety through maintenance and passenger limits on board; (3) Ensure road and passenger safety through traffic management during transportation pick-up and drop-off; (4) Provide codes of conduct and training for drivers; (5) Ensure pick-up/drop-off at key locations discussed with LCSB and CSR Committee.
- **Recommendation for PIC Tenants.** (1) Provide Park Management with necessary employment projections, shift schedules, among others; (2) Contribute a pro rata share of the cost of transportation services to/from PIC based on respective number of employees. The cost structure (full or partial subsidy) will be determined in the future; (3) Develop Transportation Plan, if necessary.
- **Recommendation for IDB.** (1) Provide technical assistance as needed; (2) Engage Transport Specialists within IDB to discuss current related operations in the Northern region.

36. **Gender Based Violence.** The IDB's Operational Policy on Gender Equality in Development Policy (OP-270) states that the Bank will introduce measures to prevent, avoid, or mitigate any adverse impacts and/or risks of GBV or exclusion in its operations. Additionally, verbal and physical abuse by supervisors has been widely reported in the textile industry worldwide and is exacerbated by the level of social violence and sexual harassment against women that exists already.

- **Recommendation for GOH.** (1) Enforce legal obligations of OP-270 as well as Haitian legislation on GBV; (2) Support PIC in developing proactive policies to mitigate any risks of GBV.
- **Recommendation for Park Management.** (1) Develop proactive policies for addressing GBV and abuse within the workplace, including training and awareness, as well as sanctions and/or consequences as a result of noncompliance. These programs will be included in hiring and training plans, as well as with initiatives related to CSR.
- **Recommendation for PIC Tenants.** Develop proactive policies for addressing GBV and abuse within the workplace, including training and awareness, as well as sanctions and/or consequences as a result of

noncompliance. These programs will be included in hiring and training plans, as well as with initiatives related to CSR.

- **Recommendation for IDB.** (1) Ensure application of OP-270 throughout PIC operations; (2) Develop trainings and technical cooperations to support such initiatives.

37. **Physical Disability.** Impacts of the 2010 earthquake, as well as violence, have resulted in a substantial population of disabled persons who are otherwise capable of performing work. The provision of access to employment opportunities for physically disabled persons will benefit this disadvantaged population.

- **Recommendation for GOH.** (1) Ensure physical layout of PIC includes wheelchair accessible ramps, toilets, and work stations, among other issues to be identified; (2) Support Park Management and PIC Tenants in developing non-discriminatory policies for physically disabled populations
- **Recommendation for Park Management.** Adopt a policy that no person will be subject to any discrimination based on physical disability in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of disability.
- **Recommendation for PIC Tenants.** Adopt a policy that no person will be subject to any discrimination based on physical disability in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of disability.
- **Recommendation for IDB.** Support GOH, Park Management, and Tenants in ensuring non-discriminatory practices and policies, as well as consideration of disability in construction phase

38. **Employee Security.** Several measures will support the development of employee safety and security within PIC, including access to proper identification, access to the formal banking system, as well as separate entrances in PIC for pedestrians and motor vehicles.

- **Recommendation for GOH.** Develop separate entrances to PIC for pedestrians, which will increase safety at peak entrance and departure times.
- **Recommendation for Park Management.** (1) Manage safe and secure employee entrance and departure during peak hours, during visits, and throughout the day as needed; (2) Provide PIC employees with identification.
- **Recommendation for PIC Tenants.** Provide Park Management with necessary employee information to allow for standardization of employee identification within PIC.
- **Recommendation for IDB.** Provide technical assistance as needed.

39. **Park Security.** Private security operations play an important role in protecting clients, with potentially negative and positive impacts on local populations, general security in the identified area, and the enjoyment of human rights and the rule of law. The International Code of Conduct for Private Security

Service Providers (the Code) establishes the guiding principles for the development of standards, implementation, and oversight mechanisms.

- **Recommendation for GOH.** Support Park Management and PIC tenant stakeholders in adoption of the Code.
- **Recommendation for Park Management.** Adopt the Code and implement it within its security operations on site.
- **Recommendation for PIC Tenants.** If tenants have own security operations, they will also adopt and implement the Code.
- **Recommendation for IDB.** Provide technical assistance as needed.

40. **Grievance Mechanism.** Grievance mechanisms instill positive relations between employees and management. The grievance mechanisms in PIC shall be established based on the principles of effective grievance mechanisms adopted by the United Nations Human Rights Council in June 2011, which state that grievance mechanisms shall be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source for continuous learning and based on engagement and dialogue.<sup>11</sup> The respective policies and protocols to prevent Gender Based Violence (GBV) in the workplace can also be included in the grievance mechanism.

- **Recommendation for GOH.** Ensure application of grievance mechanisms within PIC.
- **Recommendation for Park Management.** (1) Develop proactive protocols and procedures for PIC level grievances in accordance with UN Principles and the IDB's Operational Policy on Gender Equality in Development; (2) Manage communication channel for grievances at central level and relay concerns to appropriate entities and tenants within PIC; (3) Develop internal grievance mechanism for Park Management employees.
- **Recommendation for PIC Tenants.** (1) Engage in development and implementation PIC level grievance mechanisms as developed by Park Manager; (2) Develop proactive factory specific mechanisms which are consistent with the central grievance system which includes foreign/local labor relations among others and adequate measures to address GBV and the IDB's Policy on Gender Equality.
- **Recommendation for IDB.** (1) Ensure application of Grievance Mechanism; (2) Provide technical assistance as needed, particularly with reference to its Operational Policy on Gender Equality in Development.

41. **Trade Union Access.** Conventions No. 87 and No. 98 of the International Labor Organization provide a sound basis for the rights of workers to freedom of association and include the right to organize workers and bargain collectively. In cases where a factory is located within an Industrial Park, the Park and the factory will need to provide reasonable access of trade union representatives to the workforce so as not to infringe on those rights.

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<sup>11</sup> See paragraphs 28 – 31, *Report of the Special Representative of the Secretary-General on the issue of human rights and transnational corporations and other business enterprises, John Ruggie; Guiding Principles and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework*, see: <http://www.business-humanrights.org/media/documents/ruggie/ruggie-guiding-principles-21-mar-2011.pdf>.

- **Recommendation for GOH.** Support the policies and protocols as needed.
- **Recommendation for Park Management.** (1) If requested, provide physical space on site for trade unions activities; (2) Work with PIC tenants where necessary to allow full participation in BWH.
- **Recommendation for PIC Tenants.** If requested, provide physical space on site and liaise with Park management to ensure adequate space on site.
- **Recommendation for IDB.** Provide technical assistance as needed.

42. **Formal Banking System.** Best international practice promotes the formalization of compensation through banking and other credit systems, as cash compensation often leads to risks of violence, theft, and informality. As the FBS has been mobilized to provide compensation for farmers affected by PIC land acquisition, experience demonstrates that this is a viable option in the northern region. A collaboration of the IDB, GOH, Park Management, PIC Tenants and other stakeholders could incentivize the commercial banking sector to open branches and financial services (bank accounts, debit cards and ATM terminals) in the northern region of Haiti. Such services would have significant positive socioeconomic impacts which include literacy, savings, formal credit records, and security, among others. PIC Stakeholders could potentially reach an agreement to compensate workers through the FBS if the commercial banking sector agrees to expand services to the PIC site area.

- **Recommendation for GOH.** Engage with FBS during high-level stakeholder meeting to mobilize their participation, negotiate terms, among other items.
- **Recommendation for Park Management.** (1) Liaise with GOH to support negotiations with FBS stakeholders; (2) Liaise with FBS and GOH to allow for installation on site, as required.
- **Recommendation for PIC Tenants.** Support GOH, Park Management, and IDB in mobilizing the FBS including communications with employees..
- **Recommendation for IDB.** (1) Support GOH in mobilizing the FBS during high-level meetings; (2) Provide technical assistance as needed.

43. **Day Care Center.** Poverty and highly mobile populations contribute to a high incidence of young and/or single mothers in Cap Haitien-Ouanaminthe corridor. In addition, social services and related infrastructure are lacking in the area. Maternal and child health statistics from the World Health Organization state that exclusive breastfeeding for the first six months-one year of life is the best infant feeding practice for enhancing child survival, growth, and development. As many of the young, single mothers will be eligible candidates for employment in PIC, the installation of an on-site daycare center for children 0-2 years old is recommended, to allow for access to lactation and healthy child development. As mentioned in the introduction to Section VI, this and other recommendations must be discussed and negotiated with stakeholders before becoming an action item.

- **Recommendation for GOH.** (1) Make land and space available on site for construction of daycare facilities where requested; (2) Negotiate best cost to

- provide such services; (3) Support Park Management in preparation of bidding documents and selection of proposals for daycare centers on site.
- **Recommendation for Park Management.** (1) Make land and space available on site for construction of daycare facilities, where requested; (2) Negotiate best cost to provide such services; (3) Prepare bidding documents and selection of proposals for daycare centers on site.
  - **Recommendation for PIC Tenants.** Contribute to daycare center cost, if this service is offered on site. The cost of daycare, if on site, would be shared between tenants and employees.
  - **Recommendation for IDB.** (1) Support Park Management and GOH in preparation of bidding documents and selection of daycare providers; (2) Support GOH in accessing technical cooperations and financing for daycare provision, and training.

## **Component II: Local Stakeholders and Community Support**

44. **Stakeholder Engagement.** Local communities are highly organized and highly articulate about their desires and concerns. During the preparation of the Compensation Plan for the land acquisition process for PIC, the permanent on-the-ground presence of a Haitian consulting firm (ERICE-AZ) was critical for providing a two-way channel of communication for leaders of the community and PIC. Communities seek to proactively engage with and participate in the development of PIC and the surrounding areas, particularly in this phase. Such activities include training, job opportunities, insight on Corporate Social Responsibility (CSR) activities, and the mobilization of existing community organizational structures to proactively prevent social unrest. Surrounding communities are a potential source of support to development of PIC.

45. **Local Stakeholders Consultative Body (LCSB).** The role of local stakeholders in collaboration with PIC is recommended to be institutionalized through the formation of a Local Stakeholders Consultative Body (LSCB) comprised of already existing organizations which include the *Association des Leaders Naturels de Caracol et du Trou-du-Nord* (ALENAC) and the Federation of Women's Associations, as a gender-balanced LCSB is supported by the IDB's Operational Policy on Gender Equality in Development (OP-270). The objective of the LSCB shall be to serve as a liaison for the local PIC communities and proactively engage with and participate in the development of PIC through training, employment, and participation in CSR Committee initiatives. The LCSB can also support related developments such as incentivizing the local private sector and community based mediation/conflict resolution outside PIC, which is particularly critical during the initial phase as population influx begins to occur.

- **Recommendation for GOH.** (1) Support the formalization of Natural Leaders into LCSB through Compensation Plan resources; (2) Increase resources of this component within the Compensation Plan to allow for female participation in LCSB; (3) Expand functions to include community

- based conflict mediation activities and recommendations to incentivize the local private sector for related services that could be needed outside PIC.
- **Recommendation for Park Management.**(1) Provide access (identification etc.) and physical space for operation of LCSB on PIC site; (2) Convoke regular meetings with LCSB in collaboration with CSR Committee;
  - **Recommendation for PIC Tenants.** Engage with LCSB on demand basis.
  - **Recommendation for IDB.** Provide technical assistance as needed, particularly related to initiatives and technical cooperations related to gender equality within LCSB.

46. **Corporate Social Responsibility (CSR) Committee.** The CSR Committee has the responsibility of promoting PIC and engaging the local community through a collaborative effort of PIC tenants, Park management, and local communities (represented by the Local Stakeholders Consultative Body). This committee can play an important role in coordination, planning, policy setting and communication. The CSR Committee will be the primary vehicle within the Park to address stakeholder concerns.

- **Recommendation for GOH.**Support Park Management and PIC tenants in engaging stakeholders.
- **Recommendation for Park Management.**(1) Develop policies and procedures for CSR Committee operations; (2) Convoke regular (monthly, then quarterly as needed) meetings with PIC tenants and LCSB representatives to discuss CSR initiatives and issues; (3) Support community input dimension of Transportation Plan, among others; (4) Refer stakeholders to appropriate entity for specific concerns.
- **Recommendation for PIC Tenants.** Full participation in CSR Committee and its related initiatives.
- **Recommendation for IDB.** Provide technical assistance as needed on this issue and potential technical cooperations in this area.

47. **Security/Influx in PIC Vicinity.** As indicated above, the creation of industrial parks in other areas of Haiti has led to the rise of shantytowns outside their borders. The negative impacts of such shantytowns and unmitigated population influx include increased risks of insecurity, violence, illness (due to lack of public infrastructure), among many others. Maintaining a safe environment outside PIC is imperative for maintaining stakeholder support, mobilizing additional investment, and creating a sustainable environment for residents and employees. A comprehensive plan to address security must be prepared by the GOH and infrastructure for necessary security should be included in the Master Plan.

- **Recommendation for GOH.**(1) Issue Executive Order to freeze land transactions and new constructions within 15 mile radius of PIC until Master Plan is completed (*Prime Minister/President of Haiti/Ministry of Justice/Ministry of Interior*); (2) Provide LCSB with necessary responsibility to perform community based conflict mediation.
- **Recommendation for Park Management.**Support discussions as needed.
- **Recommendation for PIC Tenants.** Support discussions as needed.

- **Recommendation for IDB.** (1) Include security infrastructure in Master Plan and related development plans surrounding PIC; (2) Provide technical assistance as needed.

48. **Public Information.** The rise in employment opportunities in the Northeast Region, made available by PIC's operations, will require clear communication about the availability of jobs and will require orderly processes in order to avoid confusion, as well as maintain a high level of support for the project from area communities. The physical size of the kiosks will be expanded as needed to accommodate their anticipated usage levels. The locations, services offered and times of operation of each kiosk will be publicized broadly in the affected communities. Signage at the PIC entrance shall communicate the location of the kiosks and well as transportation pick up and drop off locations for PIC employees in Creole.

- **Recommendation for GOH.** (1) Promote the communication/information program to incentivize communities around PIC in order to reinforce their support. (2) Conduct recruitment-related activities at remote sites (including completing application forms and interviews), preferably near recruitment kiosks and away from Park or factory gate(s) in order to prevent job seekers from congregating outside the gates; (3) Expand staffing and services at the 5 existing recruitment kiosks to include information on about job openings, training opportunities, access to the grievance mechanism and other related information.
- **Recommendation for Park Management.** (1) Coordinate with the GOH and PIC Tenants to provide the larger exposure to all information related to recruitment and employment opportunities; (2) Liaise with the 5 existing kiosks and the LSCB to ensure that all job seekers find the proper information in a timely fashion.
- **Recommendation for PIC Tenants.** (1) Conduct recruitment-related activities at remote sites (including completing application forms and interviews), preferably near recruitment kiosks and away from Park or factory gate(s) in order to prevent job seekers from congregating outside the gates; (2) Expand staffing and services at the 5 existing recruitment kiosks to include information on about job openings, training opportunities, access to the grievance mechanism and other related information.
- **Recommendation for IDB.** Provide technical assistance as needed.

### **Component III: Monitoring and Evaluation of the Social Impact Assessment**

49. **Monitoring and Evaluation.** Monitoring and Evaluation is critical for providing information to improve decision-making and project management, assessing development effectiveness, and demonstrating results, particularly in the context of PIC where local communities play a large role in ensuring project success. M&E will support community empowerment, as well as ensure greater transparency and accountability. The IDB recommends that PIC (including tenants and Park management), submit a quarterly report to both the GOH and the IDB detailing steps taken to implement the recommendations contained in this Social Impact

Assessment. The IDB shall reserve the right to independently assess the adequacy of PIC implementation of these recommendations.

- **Recommendation for GOH.** Engage IDB, Park Management, and PIC tenants on regular basis to ensure adequate implementation of recommendations and information collection for M&E.
- **Recommendation for Park Management.** Ensure implementation of recommendations and coordinate with PIC tenants for successful implementation of M&E framework.
- **Recommendation for PIC Tenants.** Ensure implementation of respective recommendations and provide information to allow for successful M&E.
- **Recommendation for IDB.** Develop Monitoring and Evaluation framework based on implementation of recommendations to include in supervision of related IDB investments in PIC.

## VII. Conclusion

The recommendations contained in this SIA are the result of a rigorous three-phase process that assessed the critical social and gender impacts and risks related to the development of PIC. As an operational document, these recommendations must be discussed with all the necessary stakeholders (international, national, regional, and local) in a collaborative fashion in order to be transformed into concrete actions. The table that follows in Annex I summarizes the key issues and recommendations.

The main messages of the recommendations contained in this SIA are:

- 1) **Risk mitigation measures are also positive opportunities to market and increase PIC's value for stakeholders.** There is inherent value for PIC stakeholders in developing proactive measures to engage communities and therefore build a base of sustained support for economic development in the region.
- 2) **The governance structures promoted by this SIA build upon existing networks that need support in formalization.** The recommendations contained in this SIA promote the formalization of already existing organizational structures to liaise with communities, promote a healthy and productive workforce, and incentivize the local private sector.
- 3) **A high-level meeting to discuss these recommendations is critical,** as they are starting points for dialogue and negotiation between all the involved stakeholders.

## VIII. Annex 1: Summary of PIC Stakeholder Recommendations

Issue	GOH	Park Management	PIC Tenant	IDB
<b>Labor Laws</b>	1) Enforce labor laws and standards at a national level, 2) Support PIC Tenants and Park Management in implementation of such laws and standards	1) Comply fully with Haitian Labor Code and ILO Declaration on Fundamental Principles and Rights at Work, whichever provides for the greater protection of employees, including specific provision for protection of women's rights 2) Regulate labor concerns as part of management functions/grievance mechanism.	1) Comply fully with Haitian Labor Code and standards related to the ILO Declaration on Fundamental Principles and Rights at Work. 2) Ensure equal pay and benefits for equal work between female and male employees. 3) Regulate labor concerns as part of mgmt functions/grievance mechanism that offers equal consideration of issues raised by female or male employees. 4) Establish gender sensitive work place practices/policies taking into account, for example, measures to prevent harm or accommodate temporary needs of women who are pregnant or lactating.	1) Support and Supervise implementation of labor laws and standards in PIC
<b>Better Work Haiti</b>	1) Support BWH on national level in addressing policy and infrastructure needs country wide	1) Allow access of BWH to collaborate with PIC tenants.	1) Obtain advisory opinion from BWH 2) Full participation in assessments, capacity building etc. of BWH. 3) Take proactive measures to address all noncompliance issues.	1) Provide technical assistance as needed.
<b>Hiring Plan</b>	1) Support Park Mgmt and PIC tenants in providing training for local communities & necessary infrastructure and logistics.	1) No less than 50% of employment opportunities with Park management come from local populations. 2) Support PIC tenants in coordination/implementation of Hiring Plans.	1) No less than 35% of employment opportunities with PIC Tenants come from local populations 2) Develop hiring plan with number, required skills & experience	1) Support PIC stakeholders in priority employment for local populations.
<b>Training Plan</b>	1) Support PIC tenants/Park Management in developing Training Plan and related programs.	1) Coordinate screening and access of potential employees, visitors, among others, to PIC tenant sites.	1) Develop list of training needs by position, including operator and management positions, for Phase I 2) Liaise with CSR Committee/LCSB to disseminate training needs and opportunities. Engage dissemination strategies that promote the inclusion of women for both operator and management level training. 3) Provide equipment and personnel for training opportunities.	1) Provide technical assistance on Training Plan to PIC stakeholders.
<b>Health Care/Health Clinic</b>	1) Call on OFATMA/NGOs to provide services in PIC. 2) Negotiate terms of installation with provider. 3) Negotiate fee transfer for such services with PIC tenants. 4) Provide physical space on site for health clinic.	1) Call on OFATMA/NGOs to provide health services in PIC. 2) Negotiate terms of installation with provider. 3) Negotiate fee transfer for such services with PIC tenants. 4) Provide physical space on site for health clinic at each PIC tenant factory. 5) Develop emergency protocols for accidents, which exceed clinic capacity.	1) Participate in low-cost health insurance scheme as stipulated by law, which covers accidents, preventive care, including maternal and prenatal care, hospitalization, among others. 2) Provide physical space for clinic on factory site. 3) Develop emergency protocols for accidents, which exceed clinic capacity with Park management.	1) Provide technical assistance to GOH and PIC stakeholders as needed.
<b>Food Vendors</b>	1) Invite independent food vendors to submit proposals for on-site business. 2) Negotiate with potential vendors to ensure quality, cost, and proper hygienic training. 3) Ensure adequate space available on site for PIC employee canteen.	1) Invite independent food vendors to submit proposals for on-site business. 2) Negotiate with potential vendors to ensure quality, cost (market price or no more than 20% of legal minimum base wage), and proper hygiene training. 3) Ensure adequate space available on site for PIC employee canteen.	1) Support Park Management in food allocation distribution that meets the needs of PIC tenants. 2) Make factory payroll system available for payment of meals to food vendors as deduction from wages, upon request of employees. 3) Consider own provision of food services.	1) Provide technical assistance to GOH and PIC tenants on food vendor selection, training, cost structure
<b>Transport Plan</b>	1) Support Park Management in developing Transportation Plan.	1) Develop Transportation Plan for PIC employees given current tenant employment projections. 2) Ensure vehicle & employee safety through maintenance and passenger limits on board. 3) Ensure road & employee safety through traffic mgmt. 4) Provide codes of conduct and training for drivers. 5) Ensure pick-up/drop-off at key locations discussed with LCSB and CSR Committee.	1) Provide Park Management with necessary employment projections, shift schedules, among others. 2) Contribute a pro rata share of transportation costs based on number of employees (cost structure TBD). 3) Develop Transportation Plan, if necessary.	1) Provide technical assistance to Park Management and GOH in developing TP. 2) Engage TSP unit of IDB on related transportation routes and improvements.
<b>Gender Based Violence</b>	1) Enforce legal obligations of OP-270 and Haitian legislation 2) Support PIC in developing proactive policies to mitigate risks of GBV.	1) Develop proactive policies for addressing GBV and abuse within the workplace, including training and awareness, as well as sanctions and/or consequences as a result of noncompliance.	1) Develop proactive policies for addressing sexual harassment and abuse within the workplace, including training and awareness, as well as sanctions and/or consequences as a result of noncompliance. 2) Establish an independent mechanism for reporting abuses (subcontracted off site or on-site) that ensure confidentiality, prevents re-victimization, and facilitates referrals to service providers in the broader community when needed.	1) Ensure application of OP-270 throughout PIC 2) Develop trainings and technical cooperations to support such initiatives
<b>Physical Disability</b>	1) Ensure physical layout of PIC includes wheelchair	1) Adopt a policy that no person will be subject to any discrimination based on physical	1) Adopt a policy that no person will be subject to any discrimination based on	1) Support GOH, Park Management, and Tenants in ensuring non-

	accessible ramps, toilets, and workstations, among other issues to be identified. 2) 1) Support Park Management in developing non-discriminatory policies for physically disabled populations	disability in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of disability.	physical disability in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of disability.	discriminatory practices and policies, as well as consideration of disability in construction phase
<b>Employee Security</b>	1) Develop separate entrances to PIC for pedestrians.	1) Manage safe and secure employee entrance and departure during peak hours, during visits, and throughout the day as needed. 2) Provide PIC employees with identification cards or badges. 3) Establish of service that would facilitate the safety of female employees entering or leaving work during hours of darkness (e.g. escort to key transportation points/bus stops immediately off-site.	1) Provide Park Management with necessary employee information to allow for standardization of employee identification within PIC. 2) Inform female employees that they can also report cases of GBV or abuses through the independent mechanisms (listed above) and that reports of such abuse will be communicated to Park Management or local authorities to identify means for improving security.	1) Provide technical assistance as needed.
<b>Park Security</b>	1) Support Park Management and PIC tenant stakeholders in adoption of Int. Code of Conduct for Private Security Providers (the Code).	1) Adopt the Code and implement it within its security operations on site.	1) If tenants have own security operations, they will also adopt and implement the Code.	1) Support adoption and implementation of PIC Code.
<b>Grievance Mechanism</b>	1) Ensure application of grievance mechanisms.	1) Develop protocols and procedures for PIC level grievances in accordance with UN Principles 2) Manage communication channel for grievances at central level/ relay concerns to 3) Develop internal grievance mechanism for Park Management employees.	1) Engage in development and implementation PIC level grievance mechanisms as developed by Park Manager. 2) Develop factory specific mechanisms, which are consistent with the central grievance mechanism system.	1) Ensure application of Grievance Mechanism. 2) Provide technical assistance on application of OP-270 Gender Policy.
<b>Trade Union Access</b>	1) Support the policies and protocols as needed.	1) If requested, provide physical space on site for trade unions activities. 2) Work with PIC tenants where necessary to allow full participation in BWH.	1) If requested, liaise with Park management to ensure provision of physical space on site for operation of trade unions.	1) Provide technical assistance as needed.
<b>Local Stakeholders Consultative Body</b>	1) Support Formalization of Natural Leaders into LCSB through Compensation Plan resources. 2) Increase resources of this component to allow for female participation in LCSB. 3) Community based conflict resolution 4) Recs to incentivize local private sector for related services outside PIC	1) Provide access (identification, etc.) and physical space for operation of LCSB on PIC site. 2) Convoke regular meetings with LCSB in collaboration with CSR Committee.	1) Engage with LCSB on demand basis.	1) Provide technical support, advice on technical cooperations related to gender equality in the development of LCSB.
<b>Corporate Social Responsibility Committee</b>	1) Support Park Management and PIC tenants in engaging stakeholders.	1) Develop policies and procedures for CSR Committee operations. 2) Convoke regular meetings with PIC tenants and LCSB representatives to discuss CSR 3) Support community input dimension of Transportation Plan, among others 4) Refer stakeholders to appropriate entity for specific concerns.	1) Participate in CSR Committee and its related initiatives.	1) Support CSR Committee initiatives. 2) Advise GOH on potential technical cooperations to support such initiatives.
<b>Public Information</b>	1) Promote communication program to incentivize the communities around PIC. 2) Conduct recruitment activities at remote sites. 3) Expand staffing and services at the 5 existing recruitment kiosks to include info on job openings, training opportunities, access to the grievance mechanism	1) Coordinate with the GOH and PIC Tenants to provide the larger exposure to all information related to recruitment of workers and job opportunities. 2) Liaise with the 5 existing kiosks and the LCSB to ensure that all job seekers find the proper information in a timely fashion.	1) Promote communication program to incentivize the communities around PIC 2) Conduct recruitment activities at remote sites that targets women and men. 3) Expand staffing and services at the 5 existing recruitment kiosks to include information on about job openings, training opportunities, access to the grievance mechanism and other related information.	1) Provide technical assistance as needed.
<b>Security/Influx</b>	1) Increase public security presence outside PIC, including special attention to the safety of female employees who enter or leave the Park during darkness. 2) Executive Order freeze land transactions constructions w/in 15-mile radius of PIC until Master Plan completed. 3) Support community based mediation activities of LCSB	1) Support discussions as needed.	1) Support discussions as needed.	(1) Include security infrastructure in Master Plan and related development plans surrounding PIC (2) Provide technical assistance as needed.

<b>Formal Banking System</b>	1) Engage with FBS during high-level stakeholder meeting to mobilize their participation, negotiate terms, among other items.	1) Liaise with GOH to support negotiations with FBS stakeholders. 2) Liaise with FBS and GOH to allow for installation on site, as required.	1) Support GOH, Park Management, and IDB in mobilizing the FBS Including communications with employees.	1) Support GOH in mobilizing the FBS during high level meetings. 2) Provide technical assistance as needed.
<b>Day care</b>	1) Make land and space available on site for construction of daycare facilities where requested. 2) Negotiate best cost to provide such services. 3) Support Park Mgmt in preparation of bidding documents and proposal selection.	1) Make land and space available on site for construction of daycare facilities, where requested. 2) Negotiate best cost to provide such services. 3) Prepare bidding documents and selection of proposals for daycare centers on site.	1) Contribute to day care center cost if this service is offered on site. Cost structure is TBD and would potentially be shared between employers and employees.	1) Support Park Management and GOH in preparation of bidding documents and selection of daycare providers. 2) Support GOH in accessing technical cooperations and financing for daycare provision, training.
<b>Monitoring &amp; Evaluation</b>	Engage IDB, Park Mgmt and PIC tenants to ensure implementation of recs and information collection for M&E.	Ensure implementation of recs and coordinate with PIC tenants for successful implementation of M&E framework.	Ensure implementation of respective recs and provide information to allow for successful M&E.	Develop M&E framework based on implementation of recs to include in supervision of related IDB investments in PIC.