CARIBBEAN COMMUNITY CLIMATE CHANGE CENTRE

Building Resilience. Securing Our Future.

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Environmental and Social Information Disclosure Policy

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1. Introduction

The Caribbean Community Climate Change Centre (CCCCC) acknowledges its obligations to safeguard environmental and social sustainability through its pursuit of climate-resilient development across the Caribbean. The CCCCC's Environmental and Social Management System (ESMS) aims to protect, preserve, and promote human and environmental wellbeing and it provides a framework for a sound, systematic, and transparent management system founded on the principles of sustainable development.

In operationalising CCCCC's ESMS, CCCCC shall disclose environmental and social information for its projects and programmes in a transparent, timely, accessible, and understandable manner, consistent with applicable national legal requirements in the respective CCCCC Member States and with CCCCC's ESMS requirements. All definitions and policy principles contained in the ESMS shall apply to this Policy. Disclosure shall be proportionate to project risk category and shall include relevant safeguard documents, non-technical summaries, stakeholder engagement information, and grievance mechanism details. Information shall be disclosed through online and locally accessible channels, in appropriate languages and formats, and shall support meaningful participation of affected stakeholders, including culturally appropriate engagement with Indigenous Peoples and, where relevant, Free Prior and Informed Consent (FPIC) processes.

2. Purpose

This Policy establishes a clear and consistent framework for the timely, accessible, and transparent disclosure of environmental and social information for CCCCC-supported projects consistent with the CCCCC's ESMS, applicable donor requirements, and national legal and regulatory requirements.

3. Scope

This Policy applies to all CCCCC-supported projects and programmes and to all its implementing/executing partners involved in project preparation and implementation where environmental and/or social risks or impacts may arise. Disclosure requirements shall be proportionate to the project's/programme's environmental and social risk category, financing requirements, and applicable national legal requirements.

4. Core Principles and Requirements

CCCCC and its implementing/executing partners shall disclose, as applicable, to the project/programme and its risk level, the relevant environmental and social safeguard documents. These may include the Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP), Environmental and Social Management System (ESMS), Environmental and Social Management Framework (ESMF),

Indigenous Peoples Plan (IPP) or framework (IPPF), resettlement-related documents, environmental and social audits, non-technical summaries, stakeholder engagement information, and information on grievance redress mechanism. Disclosure shall be made in English and in other relevant local language(s), where needed. It shall be available through direct website and other online links and in designated physical locations accessible to affected people, such as project sites, local offices, town halls, or similar venues. The objective is to ensure practical access for stakeholders, including those without reliable internet access.

CCCCC shall apply the following principles:

- maximum appropriate access to environmental and social information;
- timely disclosure before projects or programmes are approved;
- information provided in clear language and accessible formats;
- disclosure through channels convenient to affected people; and
- meaningful stakeholder engagement throughout the project cycle.

5. Exceptions and Confidentiality Framework

While CCCCC is committed to maximum appropriate disclosure, certain categories of information may be withheld or redacted from public disclosure where disclosure would cause harm disproportionate to the benefit(s) of release. Exceptions shall be interpreted narrowly and shall not be used to withhold environmental and social risk information material to affected stakeholders' understanding of a programme or project. To this end, information may be withheld or redacted in whole or in part, where it falls within one or more of the following categories:

- Personal data: Names, contact details, compensation amounts, or other personally identifiable information relating to individual project-affected persons, beneficiaries, or complainants, except where the individual has provided informed consent to disclosure or disclosure is required by national law;
- Legally privileged information: Information subject to legal privilege or that CCCCC is otherwise prohibited from disclosing under applicable law or contractual obligation.

In applying such exceptions, CCCCC shall seek to ensure the greatest degree of transparency possible while protecting legitimately confidential, personal, proprietary, or otherwise restricted information.

6. Legal Alignment

The disclosure process for each project or programme must be aligned with the legal and regulatory requirements of the respective CCCCC member state. Where national law requires specific disclosure steps, languages, notice periods, or approval procedures,

those requirements shall be followed. CCCCC safeguard requirements operate as an internal minimum standard and shall be applied in a manner consistent with country circumstances and in coordination with relevant national authorities, as required.

7. Minimum Disclosure Timing

For projects and programmes that are in development, and subject to CCCCC ESMS application, the following are minimum disclosure periods:

- **Category A projects:** Disclose relevant safeguard documents at least 60 calendar days before the decision of the relevant decision-making body;
- **Category B projects:** Disclose relevant safeguard documents at least 30 calendar days before the decision of the relevant decision-making body;
- **Category C projects:** No disclosure required prior to decision making, unless otherwise required by national legal and regulatory requirements.

8. Accessibility and Disclosure Channels

Disclosure shall be made:

- on the CCCCC and/or implementing/executing partner websites and social media channels through direct and active links;
- in locations convenient to affected people, such as project sites, community venues, local authority offices, or other accessible locations; and
- in English and in relevant local language(s), and in formats understandable to affected stakeholders.

9. Stakeholder Engagement and Inclusion

Disclosure is not a stand-alone compliance activity; it is part of a broader process of stakeholder engagement. CCCCC and its implementing/executing partners must engage stakeholders early and throughout the project cycle, including through informed consultation and participation, as needed. Stakeholders should be informed of the nature, scale, duration, risks, impacts, mitigation measures, and complaint channels related to the project. Comments received through consultation should be documented and considered in project preparation and implementation.

Where Indigenous Peoples may be affected, disclosure and engagement must be timely, inclusive, culturally appropriate, and respectful of community governance systems, protocols, cultural practices, and communication preferences. Information should be provided in language and formats communities understand, with sufficient time for reflection and response. Where activities may significantly affect rights, lands, territories, resources, or culture, the process shall incorporate Free, Prior and Informed Consent (FPIC), as applicable, under the CCCCC Indigenous Peoples Policy and relevant country circumstances.

10. Disclosure during Project Implementation

CCCCC and implementing/executing partners, where applicable, shall disclose during project implementation relevant environmental and social information, including updates on environmental and social performance, implementation of mitigation measures and management plans, material changes to such measures, stakeholder engagement processes, grievance redress arrangements, and other monitoring or reporting information relevant to affected people and other interested stakeholders.

Such disclosure shall be timely, proportionate to project risk, provided in clear language and accessible formats, and made available in English and relevant local language(s), through online and physical channels convenient to affected people. Where Indigenous Peoples are affected, disclosure shall be culturally and linguistically appropriate and shall respect traditional communication channels and applicable requirements relating to full and effective participation and Free, Prior and Informed Consent. CCCCC and/or implementing/executing partners shall maintain records of disclosure activities, comments received, grievances raised, responses provided, and any resulting revisions to environmental and social measures or project implementation arrangements.

11. Emergency and Incident Related Disclosure

Where emergency situations, serious incidents, or other material environmental and social events arise during implementation, CCCCC and/or the implementing/executing partner shall disclose appropriate information to affected communities and relevant authorities regarding preparedness, response measures, and any actions necessary to protect people, communities, and the environment, subject to applicable legal, safety, and confidentiality requirements.

12. Monitoring and Reporting

Monitoring and evaluation reports, environmental and social performance updates, and other relevant implementation-stage reports prepared for CCCCC's governance, oversight, or accountability purposes shall be disclosed in accordance with this Policy and through appropriate means, including publication on the CCCCC'c website and, where applicable, other channels accessible to affected stakeholders. CCCCC encourages implementing/executing partners to make publicly available periodic reports on environmental and social sustainability, which may also be publicised through the CCCCC's website.

13. Grievance and Accountability

Each relevant project shall maintain an accessible grievance redress mechanism (GRM) through which affected people may raise concerns related to environmental and social

performance. Grievances shall be addressed in a timely manner, in accordance with the Project-level GRM and/or the CCCCC's GRM and the mechanism shall not prevent access to judicial or administrative remedies available under national law.

14. Responsibility

The CCCCC and implementing/executing partners, where applicable, are jointly responsible for ensuring that disclosure obligations are identified early, that required documents are prepared and cleared, that disclosure occurs within the applicable timeframes, and that records are maintained on where, when, and how disclosure took place. CCCCC, and implementing/executing partners, where applicable, are also responsible for documenting comments received, responses provided, and any resulting revisions to safeguard measures or project design.

Annex 1: CCCCC Environmental and Social Disclosure Process

To give effect to this Policy, CCCCC shall apply the following environmental and social disclosure process that promotes transparency, accountability, and meaningful stakeholder engagement throughout the project cycle. The process shall be applied in a manner proportionate to the nature, scale, and risk classification of the project or programme, while remaining aligned with applicable donor requirements and the legal and regulatory requirements of the relevant CCCCC member country.

Step 1. Consistent with CCCCC's ESMS, screen and categorise the project early to determine environmental and social risk and identify applicable disclosure obligations.

Step 2. Check legal and language requirements

Before disclosure, confirm:

- ✓ applicable national legal disclosure requirements;
- ✓ required languages;
- ✓ culturally appropriate communication methods;
- ✓ disclosure locations; and
- ✓ any country-specific consultation or approval requirements.

Step 3. Prepare the disclosure package

Relevant Project staff, Environmental and Social Specialist, and Gender and Inclusion Specialist will prepare the documents required for the relevant category and context, which may include *inter alia*:

- ✓ The environmental and social impact assessment;
- ✓ The environmental and social management plan;
- ✓ The environmental and social management system for programmes;
- ✓ The environmental and social management framework where sub-projects are unspecified.
- ✓ Any other relevant safeguard instruments, such as Indigenous Peoples plans/frameworks, resettlement documents, or environmental and social audits;
- ✓ A non-technical summary in plain language;
- ✓ Information on stakeholder engagement arrangements; and

- ✓ Information on the project or programmes grievance redress mechanism, as well as that of the CCCCC's GRM.

Step 4. Complete internal clearance to confirm that documents are ready for public release

CCCCC's ESS Specialist and the implementing/executing partner will confirm that:

- ✓ documents are complete;
- ✓ active links and locations for disclosure are ready;
- ✓ summaries are understandable to non-technical audiences; and
- ✓ the required disclosure timeline can be met.

Step 5. Disclose publicly on the CCCCC and/or implementing/executing partner website and other social media channels and in locations convenient to affected communities, in appropriate languages and accessible formats.

Step 6: Consult, record, and respond

CCCCC and/or implementing/executing partner will document stakeholder views, address concerns, operate the grievance mechanism, and re-disclose updated information at least annually during implementation, or promptly where material changes to risk, scope or safeguard performance arise.