
PROCESS FRAMEWORK

*LEVERAGING ECO-TOURISM FOR BIODIVERSITY PROTECTION
PROJECT P170846*

DRAFT

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ACRONYMS

CAPMA	The Cabrits National Park Marine Section Management Authority
CCCCC	Caribbean Community Climate Change Centre
GRM	Grievance Redress Mechanism
MBGEANFS	Ministry of Blue and Green Economy Agriculture and National Food Security
MERMKU	Ministry of Environment Rural Modernization and Kalinago Upliftment
NLUP	National Land Use Policy
NPPAA	National Parks and Protected Areas Act
PAP	Project Affected Person
PIU	Project Implementation Unit
WNT	Waitukubuli National Trail

Project Objective and Components

The Leveraging Eco-Tourism for Biodiversity Protection Project (LEToBP) (P170846) is intended to improve the management of Dominica's Waitukubuli National Trail (WNT) and its three national parks, namely the Morne Trois Pitons National Park, the Cabrits National Park and the Morne Diablotin National Park. The Project aims to "transform tourism from a potential threat to an opportunity for biodiversity by strengthening the management of protected areas and the trail network and by expanding their sustainable eco-tourism use in an inclusive manner" (Project Paper, Leveraging Eco-Tourism for Biodiversity Protection). While, therefore, the Project is focused on the preservation and conservation of the country's biodiversity, it is also concerned to promote and support activities that improve the livelihoods of the populations situated in the vicinity of the protected areas. It includes special considerations for the vulnerable and the Kalinago.

The Project has four components.

Component 1: Protected Area Planning (US\$846,900). This is intended to improve the institutional arrangements for enhancing the national capacity for planning and management of protected areas (PAs). It is geared towards improving capacities at the national and local levels. This component provides for technical support in revising management plans for the PAs and the WNT and for the demarcation of boundaries. The Project will also provide the technical studies for the demarcation of a buffer zone for the Morne Diablotin National Park. The implementation of the buffer zone, however, will be outside of its scope.

Component 2 addresses **Biodiversity and Sustainable Nature-based Tourism Operations (US\$1,753,800)**. It focuses on improving tourism infrastructure that is in harmony with the natural environment, and which will improve the visitor's access, safety and experience. In that regard, the Project provides for the construction of facilities or improvements to be made to existing services, such as interpretation centres, benches, gazebos, shelters, washrooms and viewing platforms. It mandates that these infrastructure improvements be located in "selected nature-based sites within parks and along the WNT" (Project Paper, Leveraging Eco-Tourism for Biodiversity Protection).

One of the key aspects is the proposed introduction of an e-ticketing system that could be linked to digital maps and information, thus upgrading the service to potential visitors to the PAs and the WNT. This innovation, together with the proposed revision in the fee structure, is projected to generate a 30 per cent increase in revenue.

Component 3, titled **Sustainable Livelihoods (US\$747,854)**, seeks to provide opportunities for improving sustainable livelihoods in a way that strengthens biodiversity. This will be accomplished through investment in sustainable land use and through the preservation and inter-generational transfer of

traditional, Kalinago knowledge that complements biodiversity. The Kalinago, particularly women and youth, are singled out for special consideration in terms of promoting sustainable livelihoods.

Component 4 treats with **Project Management (US\$167,728)**. The funding for this component is earmarked for administrative support, financial management, monitoring and evaluation, and audit costs for the life of the Project.

The LEToBP has as its central remit the sustainable use of the natural assets of the national parks and the Waitukubuli Trail, to promote activities that generate employment and revenues, for the benefit of the affected populations, particularly women and youth and the Kalinago Community.

Purpose of the Process Framework

The World Bank's Environmental and Social Standard 5 (ESS5): Land Acquisition, Restrictions on Land Use and Involuntary Resettlement, which treats with land acquisition, restrictions on land use and involuntary resettlement, provides for the development of a process framework (PF). The process framework in turn addresses those situations where a project imposes restrictions on land use and access to natural resources, so that individuals or communities may lose customary or traditional access to land or natural resources. This typically occurs in projects that entail the establishment of national parks, protected areas and buffer zones. A process framework is triggered in this project, which calls for the establishment of a buffer zone for the Morne Diablotin National Park, the demarcation and mapping of a land use plan for the Kalinago Territory and updating of plans for the management of Dominica's three national parks.

In general, the project, which seeks to put structures in place to address issues such as land degradation, encroachment on water catchment areas, loss of biodiversity through indiscriminate cutting down of forests, or incompatible land use within the national parks, will result in some restrictions on access to land and natural resources. The issues and the participatory processes through which they will be addressed are analysed in the Process Framework.

Policy Framework

The key issues relating to the bio-physical environment, and which this project seeks to address, have been summarized in the Draft National Physical Development Plan (NPDP), which notes that biodiversity is under threat from human activity and natural disasters. The NPDP holds that significant species have been impacted by deforestation, over-exploitation of wildlife and sedimentation and erosion from quarrying on the west coast areas. The Plan also identifies encroachment, unregulated development, natural disasters and climate change as contributors to biodiversity loss. It also notes that the Kalinago Territory, in particular, faces risks of landslides and erosion from continued cultivation of root crops (Ministry of Planning, Economic Development and Investment, 2016. Draft Dominica National Physical Development Plan). The National Land Use Policy (NLUP) identifies the Kalinago Territory as one of five forest areas to be addressed in land use planning. However, it stipulates that the Kalinago Territory will be treated as a special policy area in recognition of the Kalinago's unique position as the original inhabitants of the island and planned in a way that supports the culture and lifestyle of the people, their structures, and historical and natural attractions. The right to land use and access to natural resources is therefore subsumed in this Policy.

An important policy guideline is that permitted uses in the national parks and forest reserves should be conservation and commemorative uses, recreation uses and low impact tourism uses that are compatible with preserving the natural beauty of the environment (NLUP and National Parks and Protected Areas Act (NPPAA) in the NPDP). In addition, following the policy guideline set by the NLUP that buffer zones should be established around the National Parks and the WNT, the NPDP establishes the following dimensions for the buffer zones:

- Private lands adjacent to the Morne Diablotin National Park: 200 metres
- Forest Area adjacent to Morne Diablotin: 500 metres
- Private lands adjacent to Morne Trois Pitons: 200 metres
- Public lands adjacent to Morne Trois Pitons: 300 metres
- All other cases: 150 metres

It also stipulates that development is permitted within the transition/buffer zone, provided "it will not have negative impacts on the National Park or Forest Reserve and is compatible with Dominica's 'Nature

Island' identity and maintaining a high quality experience" (Ministry of Planning, Economic Development and Investment, 2016. op cit).

Situation Analysis of the National Parks and the Waitukubuli National Trail Specific to the Kalinago Territory

Demarcation of a Buffer Zone for the Morne Diablotin National Park

The objectives of buffer zones have been cited as follows:

- To reduce the direct impact of agriculture on the biodiversity of the park
- To protect the nesting sites of the parrots and minimize human disturbance
- To afford some level of protection to the watersheds
- To reduce the possibility of increased potential residential development adjacent to the boundary of the park
- To ensure that stakeholder communities can sustain livelihoods that are compatible with the objectives of the Park (Edwards, Marie-Jose, 2011. Caribbean Community Climate Change Centre (CCCCC) / SPACC Project Technical Report: Design of Buffer Zones for the Morne Diablotin National Park and the Morne Trois Pitons National Park World Heritage Site. Prepared for the Government of the Commonwealth of Dominica).

The study (Edwards, 2011. CCCCC/SPACC Technical Report, op cit) recommended the establishment of a buffer zone around the Morne Diablotin National Park, consisting of a depth of 200 metres on the south west on private lands adjoining the park and 500 metres on the northern and eastern areas consisting of forest lands. This buffer zone would consist of three sub-zones, namely government-owned forest lands, privately owned forest lands on rugged terrain and privately owned agricultural lands within two (2) km of the western boundary. It also noted that the total acreage of the buffer zone would be 2,793.65, of which 358.66 acres are privately owned.

Some of the issues raised in the report included the reluctance on the part of some farmers to negotiate with Government for the sale of their land, in that they anticipated that they could attract better prices from developers and that the negotiation with Government would be too lengthy a process. Another finding was that most farmers were interested in selling their land to Government at market prices, as opposed to the going rate for agricultural lands. Others were interested in land exchange, with the proviso that the transaction should add value given that their parcels were under cultivation. This category of farmers was not willing to resume agricultural production at their age. A smaller percentage reported not having any interest in land swap and would like to continue their agricultural activities (Edwards, 2011. CCCCC/SPACC Technical Report, op cit).

Updated information suggests that there are several abandoned estates in the area, which once were cultivated mainly with citrus and some bananas. This may have been linked to the fact that they have had an issue of crop depredation by parrots. The area criss-crosses a number of old estates, which are privately owned (Forestry Department). It was recommended that an option could be to encourage the owners to shift to eco-tourism activities, given that the area is frequented by bird watchers and hikers. It was also suggested that there are productive lands in the area and that a good option would be for the Forestry Department and the Agricultural Division of the MBGANFS to work with the farmers to encourage them to cultivate alternative crops, compatible with the buffer zone and the park (Consultation with the Forest Officer, National Parks, August 3, 2021; Consultation with Director of Physical Planning, Director of Lands and Surveys and Forest Officer National Park, August 19, 2021).

A consultation was held with farmers and other stakeholders in the West Coast villages, Portsmouth and villages north of the latter on September, 22nd 2021. In response to a question by the presenter concerning what crops were currently grown, one farmer indicated that he grows yams, tannia and limes and that his interest was in growing crops that have a shelf life. Another farmer, when asked about his impressions of the Project and the options proposed for the buffer zone, indicated that he was adopting a wait and see attitude. He added, however, that he had been cultivating for twenty years and that once there might be a benefit, he would be willing to shift to new crops. A third farmer noted that he would speak at a later date (closer to the time for implementation of the buffer zone); while another inquired concerning whether it might be possible to do a land exchange.

Concern was raised by the Mayor of Portsmouth concerning the farmers' livelihoods. She noted, in the case of the buffer zone, which she held was important, that there should be consideration of the impacts that it is likely to have on livelihoods. She added that not only should the Ministry of Agriculture be engaged, but also the Dominica Export/Import Agency (DEXIA) should be brought on board to address the marketing aspect. She was also interested in how the Project would minimize some of the concerns.

A tourism stakeholder raised the issue of the moorings in the marine section of the Cabrits National Park, informing that given their current conditions, one could not dive far from shore. The meeting was also informed of the need for toilet facilities on the beaches.

The Morne Trois Pitons National Park

This project, which proposes to upgrade the management plan for the Morne Trois Pitons National Park, will complement the ongoing work for the development of the buffer zone. There is a grey area in terms of ownership of some lands, an issue noted in the Caribbean Community Climate Change Centre report (op cit) and confirmed by the Forestry Division. The Middleham Estate was bequeathed to members of the community, some of whom had worked on it, but do not have titles to the lands. The Forestry Department is working with the Physical Planning and Lands and Survey Departments with a view to establishing the ownership of lands in the area. In the case of the lands left by the benefactor, there may be traditional use rights, which could render the occupants eligible for some form of compensation, should the issue of acquisition or loss of income arise. The approach being adopted by the Forestry Division is that of encouraging private land owners to adapt to alternative land usage, preferably agro-forestry. The example was given of a farmer, who operates within the park and who has complied with shifting to alternative land usage. Should the landowners agree to this proposal, this would be an advantageous option from the perspective of the Government, since financial compensation would be significantly reduced. This approach will be tested in the consultations, which will canvass the views of the farmers and other stakeholders with respect to the development of the proposed management plan for the Park.

In a consultation held with representatives of the Village Council of Trafalgar and the Deputy Chair of the Wotten Waven Development Committee, there was confirmation that there is a land ownership issue in the Laudat community. It was also suggested that the model used in the Geothermal Project, namely that of compensation by Government for lands acquired, might be considered as an option in this project.

Other relevant information gathered from this meeting centred on livelihoods of the communities in the vicinity of the national park, the gender distribution in specific economic activities and the impact of COVID-19 on livelihoods. These key informants indicated that the main economic activities were tourism ranked in first place, farming ranked second and horticulture placed third. The male/female percentage of operators in the tourism industry differed between the two villages, represented in the meeting. In the case of Wotten Waven, it was 60/40 in favour of males; while in the case of Trafalgar, it was 35/65, favouring females. It was stated that most businesses in the Roseau Valley have their livelihoods linked to the Morne Trois Pitons National Park and the WNT. For example, Segment 3 of the WNT ends in Wotten Waven and Segment 4 commences there.

The meeting was informed that the COVID-19 Pandemic severely affected livelihoods in the Roseau Valley. This had led to the closure of guest houses and consequent loss of employment. In addition, the absence of the cruise ships had led to a disruption of the revenue stream. To the extent that the earnings of households were adversely affected, the house rates normally paid to the Village Council also declined. All aspects of the tourist trade were affected – from the drop in ticket sales for entry to the Morne Trois Pitons National Park, to sales by vendors. In addition, the village of Trafalgar had been identified to host Heritage Day during the Independence season in 2020. The cancellation of the event, due to the COVID-19 Pandemic, led to a loss of income to the villagers.

The Cabrits National Park

The Cabrits National Park stretches from Purple Turtle Bay in Portsmouth to the Lamonthe River, covering 1,300 acres. Only 200 acres is terrestrial, thus distinguishing this national park from the others. It also means that marine activities are of paramount importance in this area. In discussions with a representative of the Forestry Department and with representatives of the Village Council of Cottage (covering the villages north of Portsmouth), a number of issues have been flagged for consideration in the development/upgrade of the management plan. One issue has to do with the potential for competing uses in the marine environment, for example fishing versus diving and yachting.

The practice of spear fishing has also been highlighted as one that tends to damage corals. This and other practices will continue to be a threat to the marine environment, if certain regulations are not enforced. In this regard, the regulatory framework consists of the National Parks and Protected Areas Act (NPPAA) of 1976 and the Fisheries Act of 1987. The former is vesting the authority to manage all national parks, including the marine aspects in the Forestry and Parks Division; while the latter places the responsibility for the establishment and management of marine reserves in the Fisheries Division. There appears to be an overlap in functions of Forestry and Fisheries Divisions. However, to give effect to these legal instruments, a local area Committee, the Cabrits National Park Marine Section Management Authority (CAPMA) was established. Moreover, the Forestry and Fisheries Divisions are represented on the Board, which is comprised of Government and Non-government representatives. CAPMA's objectives include:

- to develop effective management, financing, surveillance and enforcement mechanisms for ongoing management of the marine section of the Cabrits National Park
- to promote scientific research and monitoring of the marine section's natural resources
- to ensure effective stakeholder participation and involvement
- to reduce/manage conflict from multiple uses (Cabrits National Park Marine Section. CAPMA Operational Plan)

Mr Michael Savarin, CAPMA's Secretary, indicated that in the post-Hurricane Maria period, CAPMA's operations have been scaled down to a minimum, due to a lack of resources in terms of staff and finance. To date CAPMA had deployed fifteen mooring buoys, but have difficulties maintaining them. The organisation has applied for funding to enable them to employ two wardens. He informed that its current focus is on developing sustainable livelihoods by introducing alternatives such as sea moss farming and locating fishing aggregating devices (FADs) some distance in the ocean, with the effect that they increase the catch, while minimizing harmful impacts on the near shore activities. He noted that land-based activities tended to impact the marine section. In that regard, a post-Hurricane Maria assessment of the Fond Valley Watershed area in Tan Tan had revealed signs of erosion and silting that impacted Douglas Bay. The study recommended inter alia that "sediment loading of the bay from the main river should be monitored and its impact on the health of the reef system in the bay needs to be quantified". It also recommended that a crop suitability study be undertaken to determine the viability of crops and farming systems that can be accommodated within the watershed area and that a community disaster management plan and public sensitization on watershed management, risk reduction and hazard mitigation be conducted (Baron Lyn, 2019. Post Hurricane Impact Assessment of the Fond Valley Watershed of the Cabrits National Park Marine Management Area).

In the discussions with the Cottage Village Council representatives, it was observed that consideration should be given to the construction activities in the area, for example the Cotton Hill Housing complex and the waste water being generated by it. It was argued, moreover, that when implementation takes place, there is a lack of follow-up and that this needs to be addressed. It was felt that the implications of the construction developments for drainage and waste disposal could be addressed in the Project.

It was also noted that restrictions to access in the marine environment could be met with negative reaction, if the stakeholders are not properly engaged. Private land owners would also need to be consulted. Moreover, this will apply to all other parks, thus underscoring the need for ongoing public consultations. This will be addressed in the implementation of the Stakeholder Engagement Plan, which provides for public consultations in the communities affected by the Project, at all stages of the Project.

The potential for conflict between the traditional uses and the newer ones, for example fishing versus diving has been cited as an issue to be addressed. In this regard, it has been suggested that there is a need for micro, management plans that would establish zones for fishing, agriculture and tourism. The management plan proposed by the Project is therefore timely.

With regard to livelihoods, fishing was identified by the Cottage Village Councillors as the most highly ranked activity in the community, based on the number of persons engaged in the sector. This was followed by tourism, ranked 2. Farming was ranked as the number 3 activity, followed by scuba diving, which was placed at 4. With regard to fishing, it was felt that there was a 50-50 engagement of men and women in the sector, although in separate roles. Men tend to do the fishing, while women are engaged in pulling the seine fishing net. With regard to tourism, accommodation tends to be operated by men, catering by women. Tour guiding tends to be handled by young men, a category who could be affected by potential restrictions. For example, most of the scuba diving is done in Toucarie, where tour guides take the tourists. The Councillors suggested that the provision of a glass bottom boat, where tourists

could view the underwater species, without damaging them, would be a good option for these tour guides.

Mapping, Demarcation and Development of Area Plan for Kalinago Territory

The consultation held with the Kalinago Council on June 30, 2021 centred on land use, rights and restrictions to access; as well as livelihoods. The view of the Council representatives was that the project will have positive impacts all-round, mainly in the tourism aspects. It was felt that the people would gain knowledge of the planning process and also of the timing for planting crops. For, example, root crops are more resistant to storms. “We tend to plant anytime, thinking that a storm won’t come. The use of the land has always been good for us – a people of hunters and gatherers. We are grateful for the wealth of knowledge the project will bring”, said one Councillor. “There will be two-way flow of knowledge”, added the Chief. It was also observed that land use policy was the way forward and that there was a need to educate the people on the issues. In addition, it was noted that a plant nursery would be supervised by the Councillor for Agriculture and Fisheries, who would concentrate on foods that would help in the prevention of cancer. The Council representatives also suggested that land use mapping would enable the prevention of pesticides entering the water systems and address the practice where many persons tended to construct buildings across water catchment areas. Moreover, the latter was considered the most pressing land use issue.

The Council identified a possible negative impact of the proposed land use planning and mapping, namely people’s reluctance to part with their traditional land rights. It was observed that the Kalinago have an emotional attachment to their location. It was pointed out that in the past, ten families owned large tracts of land, but that was no longer the case as many farmers currently have access to land. However, some persons still own large tracts of land through inheritance and fathers usually ensure that each child receives a parcel.

The question of ownership has to be qualified in that the land is owned communally, with the Council being legally responsible for its allocation. In response to the question concerning the procedures for assigning land, the Council indicated that it has very little leeway in terms of available land. In the words of the Chief, “The Council does not have land to allocate”. He added, however, that the Council can negotiate with persons who may be willing to sell. It should be noted that it is not the land that is sold, rather it is the right of use as well as the agricultural crops associated with the land that are sold.

This discussion had highlighted what appeared to be a potential constraint on the land use, mapping and planning project component, namely the difficulty of finding land space, in the event that improved land use management should require relocation of people from their current location. However, the Director of Physical Planning and the Director of Lands and Survey noted that this is not likely to be an issue. They indicated that concerns about topography and infrastructure may have weighed in on the view held by the Kalinago Chief. They therefore decided that they would hold a discussion with him, during which they would seek to allay his fears in that regard (Meeting held with Director Physical Planning Department, Director Lands and Survey Department and Forest Officer National Parks and PIU August 19 2021).

In the discussion concerning access to natural resources that could be restricted by the Project, Councillors indicated that firewood was not used as much as before. This is in keeping with the declining use evidenced in the inter-censal period 2001 to 2011 (Social Assessment). While all homes maintain the traditional fire mechanism, it is used mainly for backup. A case in point was that associated with the passage of Hurricane Maria when the residents had to revert to drying meat using firewood, in the absence of electricity for storage. It was also noted that there continues to be an interest in charcoal burning for use in barbecues.

With regard to water use in the protected areas, most residents of the Kalinago Territory are connected to the Dominica Water and Sewage Company (DOWASCO). However, residents of Tuna Village/Concord, are an exception and get water from spring water sources.

In terms of the means of livelihood of the Kalinago people, farming was ranked number 1, followed by craft (2), tourism (3), fishing (4) and agro-processing (5). The male/female percentages engaged in those activities are presented in the Table 1.

Table 1: Estimate of the Percentage of Male and Female Operators in Specific Economic Activities

Activity	Male	Female
Farming	60	40
Craft	50	50
Tourism	40	60
Fishing	-8 - 99-2 - 1	
Agro-processing	80	20

Source: Consultation with the Kalinago Council

The main direct beneficiary of the Waitukubuli National Trail is the Barana Aute traditional village, which is ideally located close to it and which promotes the history and culture of the Kalinago people. The Barana Aute engages a dance group, adults who sell their craft, a casava baker, a food service provider and some 20 tour guides. Farmers and fishermen benefit indirectly as providers of produce to the kitchen. In addition, there is at least one accommodation provider that benefits from the existence of the WNT. The view is held, however, that the Kalinago do not derive much benefit by way of overnight stays and moreover, it was recommended that stalls be established along the trail to enable persons to sell products to hikers (Kalinago Council).

The Council identified tourism sites that could be promoted, thus increasing livelihood earning opportunities. The recommended sites include the Magini Region to which the legend of L'Escalier Tete Chien is linked; and the Turtle Pool – Bassin Tortue. In addition, there is a cemetery near the Salybia Church, where a number of Germans had been buried. It was reported that a German ship had been torpedoed outside the Kalinago Territory during World War II and that the bodies had washed up to shore. Some Germans visited the site, an indication that it could become an attraction to German tourists.

Participatory Processes for Project Identification

The project identification process entails the engagement of key stakeholders, with knowledge of and interest in the affected communities. These are in turn grouped into the categories of key informants and members of the affected communities. The key informants are in turn categorized as the line ministries, who are responsible for policy making and implementation at the national level on the one hand and the local government entities, namely the Village/Town/Kalinago Councils and Development Committees on the other hand. Of critical importance to the development and implementation of the Project are the affected communities, including the Project Affected Persons (PAPs), those whom will be affected by any land and natural resource restrictions that may result from the Project.

It is recognized that the involvement and participation of the affected communities is critical to the design, development and implementation of projects. Their participation ensures that the Project addresses their needs, incorporates local knowledge and ensures their ownership of the components. Effective participation at the local level also ensures that the vulnerable are given a voice in the various aspects of the project cycle. A national consultation, which brought together various stakeholder groups, was held in March 2021. This was intended as an initial approach to sensitization and feedback from the participants on the Project concept.

Deepening of the consultative process required, *inter alia*, taking the process to the community level. The first step in this regard was a series of meetings with the people's representatives at the local level, namely the village councils, town councils and the Kalinago Council. This was considered important to provide an assessment of critical issues in the communities, information on the existing means of livelihood, ideas for improvement of livelihoods and likely project impacts and risks.

The following consultations have to date been held:

- Consultation with the Kalinago Council held July 31, 2021
- Consultation with Ms Jaqueline Andre, Forest Officer, Forestry, Wildlife & Parks Division held August 3, 2021
- Consultation with the Trafalgar Village Council and the Wotten Waven Development Committee held August 4, 2021
- Consultation with the Cottage Village Council held August 8, 2021
- Consultation with the Directors of the Physical Planning and Lands and Survey Departments, August 19, 2021
- Consultation with Stakeholders in the West Coast Villages, Portsmouth and Villages North of Portsmouth, September 22, 2021
- Consultation with Kalinago People, September 23, 2021

- Meeting with the Director of Gender Affairs, Ministry of Youth Development and Empowerment, Youth at Risk, Gender Affairs, Seniors Security and Dominicans with Disability, October 18, 2021

The format for the public community consultations included presentations by the PIU and the Social Safeguards Consultant on the Project's objectives and components, the issues emanating from the consultations with the Councils and other key informants; as well as a presentation on the potential impacts and risks associated with the project. The findings of the draft Process Framework were also presented. The objective was to get feedback from the community participants on all aspects of the Project, including the draft IPPF.

It should be noted that, given the restrictions posed by the spike in COVID-19 cases, the public gatherings are limited to groups of ten, while physically distanced. Consequently, the mode of consultation has shifted to a combination of limited face-to-face and virtual meetings.

With regard to project identification, the community consultations held to date served to reinforce the project ideas already developed and to introduce others, particularly in the area of livelihoods. In the consultation with the Kalinago Council, the Councillors lent support to ideas already included in the Project Document and offered other suggestions such as aquaculture based around the Cray Fish River, which is prolific in terms of its production, harnessing spring water, linking the WNT to vending and the promotion of tourist sites; as well as the revival of fishing and canoe making.

The Councillors of the Cottage Village Council recommended for inclusion in the Project a meat drying activity for women and the provision of a glass bottom boat for the youth, currently engaged in tour guiding. The use of the glass bottom boat, which will enable passengers to enjoy the marine resources without damaging them, is seen as compatible with the Project, which aims to preserve the biodiversity of the national parks, while promoting livelihoods among the young.

In the meeting held with representatives of the Roseau Valley villages, there was a suggestion that, among the amenities to be provided in the National Parks and the WNT, hand rails be provided for the handicapped and importantly, for the community to be consulted in terms of the location of the various amenities contemplated in Component 2.

Mitigation Options

Based on the research and consultations to date, the mitigation options that could be made available to the project affected persons (PAPs) include direct land replacement/land swap, land sale/acquisition, provision of substitutes e.g. in the case of loss of access to land or natural resources, support for shifting to alternative crops and support for alternative livelihoods. The processes entailed in each option as well as the eligibility criteria are set out below.

Direct Land Replacement/Land Swap

From the Government's perspective, this option is preferred to that of land acquisition, given that a cash settlement often results in a loss in agricultural production, in that the farmer is likely to leave the sector. However, there is the reservation that there are not sufficient state lands for exchange (Lands and Survey Department). The procedural steps in this option are as follows:

- The owner of the land, which falls within the buffer zone in the case of the Morne Diablotin National Park or lands that may be rendered inaccessible as a result of the demarcation and planning process in the case of the updating of management plans or the planning process for the Kalinago Territory, presents his/her title to the land
- Where he/she does not have a title, he/she must demonstrate proof of long possession. This requires the occupant being able to prove that he/she has been in uninterrupted use of the land for a period of 12 years, in accordance with item 12 (b) of the Title by Registration Act Chap 56:50. This in turn requires the signing of an affidavit by the occupant in addition to two other affidavits signed by persons who can attest to the land having been in the possession of the said occupant on a long-term basis
- The land is valued by the Lands and Survey Department and crops, if any, by the Ministry of Blue and Green Economy, Agriculture and National Food Security
- The alternative site is surveyed and valued by the Lands and Survey Department
- The owner determines whether the offer is in respect of land of equivalent productive value

- The Director, Lands and Surveys negotiates, on behalf of Government, with the owner
- If there is agreement between the owner and the Government, both parties sign
- The process must have been completed and the owner must have been granted possession of the new title before relinquishing control of the original parcel of land.

Land Sale by Owner/Acquisition by the State

The procedures for this option are guided by the Land Acquisition Act Chapter 53.02. They are as follows:

- A land owner indicates that he wishes to sell and presents proof of title
- In the absence of a title, he/she must demonstrate proof of long possession, as above stated
- The Government, through the Ministry of Housing and Urban Development, issues a declaration that is published in two (2) ordinary issues of the Gazette, after having served the declaration on the owner
- If the owner/occupant is not found in the State, the notice is posted on buildings on the land or at a suitable location within the vicinity of the land
- By the Land Acquisition Act, the land is vested in the Government of Dominica after the second declaration. However, based on the precedence adopted in the case of the Eastern Roads and the Geothermal projects funded by the World Bank, compensation is paid before the land transfer can take place
- There is negotiation between the seller and the Government, represented by the Lands and Survey Department, which makes an offer based on the replacement value
- If agreement is reached, both parties sign and arrangements are made for compensation by the Ministry of Finance
- Compensation must be settled before land transfer can take place.

Arrangements for Alternative Access to Natural Resources

The project may result in restricted access to natural resources particularly those components pertaining to mapping and zoning likely to occur in the Kalinago Territory and the updating of management plans for all national parks, in particular in the Cabrits area, which will, among other things, address the potential for conflicting uses of the marine resources. The procedures to be followed are:

- In consultation with the PAPs, develop zoning plans that ensure the continuation of livelihoods, while addressing land use and land degradation issues
- Identify substitutes to indiscriminate cutting of forests, i.e. designate areas where the Kalinago can harvest wood e.g. for burning charcoal
- Identify and support replanting schemes for raw materials such as larouma for the craft sector
- Develop a plan for protection and sustainable usage of water catchment areas
- Seek agreement of the Kalinago for zoning plans
- The Director of Physical Planning Department and the Director of Lands and Survey Department consult with the Kalinago Chief to identify alternative lands for relocation, should this be necessary

Arrangements for Alternative Agricultural Cropping Patterns

This is intended to enable farmers in the affected communities, to shift to alternative cropping patterns that are compatible with the biodiversity objectives of the buffer zone. This is the preferred option, based on the discussions held with the Government stakeholders. The procedural steps are as follows:

- The Lands and Surveys Department and the Physical Planning Department assist the PIU, Forestry and Wild Life Department in identifying the owners of the lands
- Landowners' interest is gauged during public consultation
- The Forestry Officer National Parks and the Agricultural Officer for the specific district consult with the landowners with a view to introducing them to agro-forestry or alternative crops, compatible with biodiversity objectives and which will guarantee them earnings commensurate with, or exceeding the without-project incomes

- If landowner agrees, a time table and the support services to be provided to the farmer are detailed by the Forestry Division, the Agricultural Department and the PIU
- Agreement is signed between the Landowner/farmer and the PIU

Arrangements for Alternative Livelihoods

Given that low impact tourism is one of the activities that is considered a permissible use within the parks and buffer zones, a possible solution could be to promote alternative livelihoods in this sector. This could be within the Project's activities or alternatively by providing technical assistance and links to financial assistance to enable business start-up; along with compensation for economic loss. The steps centre around consultation and negotiation as follows:

- The Forest Officer, the Agricultural Officer for the district and the PIU consult with the landowner to determine his/her interest in engagement in tourism and to arrive at an estimate of his/her current income from agriculture
- An offer of compensation for economic loss is made to the landowner
- Importantly, technical assistance in business start-up and management is provided through linking the landowner with small business advisory services and funding agencies e.g. the Ministry of Tourism, Maritime Affairs and Small Business Development, Adult Education and Youth Development Divisions, National Development Foundation of Dominica, the Credit Union League and the Agricultural and Industrial Development Bank
- Where possible, these activities are incorporated within the Project
- The Physical Planning Division provides oversight to ensure compatibility with the land use requirements established for national parks and buffer zones
- A time table is agreed between the landowner, the PIU and the Forest Officer and an agreement signed.

Criteria for Eligibility for Accessing Mitigation Measures

The potentially affected communities are given an opportunity through the consultative process to provide feedback on the potential risks and identify any adverse impacts that the Project may impose on them. The criteria for community members to be eligible to access mitigation measures would take the following forms:

- In the case of those adverse impacts that affect a community or a subgroup within the community, all members in that community or subgroup will be entitled to benefit from any mitigation measures. For example, in the case of the Kalinago, where all households treat firewood as a backup device, then the recommended measure could be to designate an area that they can access and this would be available to all members of the community.
- Where it is deemed necessary to impose restrictions on the use of marine resources, that is, regulate the manner in which the marine resources are used, the persons affected by the restrictions would be entitled to livelihood restoration measures. A case in point would be that of the tour guides who currently take tourists to enjoy sea sports. However, a cut off point for eligibility would be those who were engaged in plying the trade before the launch of the project consultation period, March 2021.
- With regard to the land transfer options, eligibility would centre around those who demonstrate ownership of land either through possession of a title or proof of long possession.

Administrative and Legal Procedures

Project implementation is the responsibility of the Project Implementation Unit (PIU), within the Ministry of Blue and Green Economy, Agriculture and National Food Security (MBGANFS). The Ministry of Environment, Rural Modernisation and Kalinago Upliftment, the grant recipient, is a key stakeholder. Moreover, its Forestry, Wildlife and Parks Division, is a pivotal partner in project design and implementation. In the context of the Process Framework, specifically in assessing and mitigating the risks that potential restrictions could impose on the project affected communities, there are specific responsibilities assigned to the Physical Planning Division of the Ministry of Economic Affairs, Planning, Resilience and Sustainable Development, Telecommunications and Broadcasting and the Lands and Surveys Division within the Ministry of Housing and Urban Development. While the Physical Planning Department is responsible for land management at a national level, the Lands and Survey Department has responsibility for state-owned lands, except for the national parks and forest lands, which are managed by the Forestry and Wild Life Division.

The Physical Planning Division is primarily concerned with land use and development planning and states as one of its main goals that of balancing the needs of the resident population with the needs of the environment. All aspects of land use – including residential, commercial, industrial, agricultural, tourism, wild life, conservation, forestry and protected lands – fall within its purview. The Lands and Survey Division is charged with the administration of all state lands as well as conducting all public surveys. These Divisions therefore have important roles to play in this Project.

The Ministry of Finance, which has overall responsibility for financial matters, is required to give approval to any financial compensatory measures that would arise in the implementation of the Project. These entities, with the exception of the Ministry of Finance, have been consulted and are aware of, and committed to, their respective roles within the Project. Attempts to schedule a meeting with the Ministry of Finance in this phase were not successful. However, the PIU plans to schedule consultations with the Ministry during the implementation phase. It should be noted, however, that procedures are in place within the Government system for settling compensation.

The laws governing the mitigation measures are the Land Acquisition Act Chapter 53:02 and the Title by Registration Act Chapter 56: 50.

The Land Acquisition Act states that Government may acquire land for a public purpose and that the Minister may publish a declaration in two ordinary issues of the Gazette, after having served the declaration on the owner/occupant. On the second declaration in the Gazette, the land is vested in the State. The authorized officer is then empowered to enter the land to conduct a survey. A Board of Assessment is appointed by the Minister with full powers to assess, award and assign compensation. The Board shall consist of a Chairperson - the Resident Judge or a person appointed by her, a member appointed by the Minister and a member nominated by the owner.

It should be noted that the timing of compensation for the land that is acquired differs from the World Bank's requirements. The Land Acquisition Act empowers the Government to take possession of the land before compensation is paid. However, in keeping with the precedence established with other World Bank funded projects, compensation is paid before the commencement of project activities. The GEF Leveraging Ecotourism for Biodiversity Protection Project will adopt the following procedures:

- Identification of land which is to be acquired
- Submission of list to the Lands and Survey Division of the Ministry of Housing and Urban Development for establishing ownership and quantum of lands
- Submission of Cabinet Paper requesting a decision to acquire land
- Cabinet approval to acquire lands for a specific public purpose and appointment of Authorized Officer
- Declaration and Publications
- Valuations by Property Valuation Unit of the Ministry of Housing and Urban Development
- Negotiations with individual property owners, except in the case of the Kalinago Territory, where land is communally owned
- Cabinet approval
- Compensation
- Escrow process is triggered in the case (where) there is no agreement with the property owner
- Acquisition and commencement of works.

The Title by Registration Act permits the applicant who is not titled to submit a request based on possession of the land. It specifies that the request must be accompanied by affidavits, signed by the applicant and at least two others, that present the facts establishing that the applicant has been in sole and undisturbed possession of the land continuously for a specified period. The request should also state that the rents, fruits and profits accruing to the land have been appropriated by the applicant as owner over the period.

Monitoring Arrangements

These consist of a review of arrangements for participatory monitoring of project activities as they relate to beneficial and adverse impacts; and for monitoring the effectiveness of measures taken to improve (or at minimum restore) incomes, livelihoods and living standards.

The responsibility for preparing monitoring reports will be that of the PIU. However, to ensure that there is optimal participation in monitoring, a team will be established comprising of PIU staff and two Council/Development Committee Representatives for each jurisdiction. For example, in the case of the

Morne Diablotin National Park, the team would consist of PIU staff and two community representatives. In the case of the Cabrits National Park, the team would consist of the PIU and one representative of the Portsmouth Town Council and one from the Cottage Village Council. In the case of the Morne Trois Pitons National Park, the model would be the same, consisting of PIU staff and two stakeholders from among the Village Council and the Development Committee. With regard to the WNT, the monitoring team established for each jurisdiction will also take on the responsibility for monitoring the segments associated with their area; while in the case of the segments bordering the Kalinago Territory, the team will consist of a PIU staff and two representatives identified by the Kalinago Council.

There would also be periodic consultations at the community level to ensure that the community members are kept abreast of project implementation and are able to provide feedback on project impacts. Tables 2 and 3 provide the basic instruments for monitoring project activities/impacts and mitigation interventions.

Tables 2 and 3 follow.

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Table 2: Implementation Plan, Beneficial Project Impacts

Objective	Indicator	Baseline	End Target	Activity	Time Frame	Responsible Agency	Resources	Verification Sources	Status*
Component 1: Protected Area Planning									
To promote sustainable management of biodiversity in the buffer zone, parks & WNT	Number of Hectares	0.00	150.00	Demarcation of Morne Diablotin National Park	Q2, Y1 – Q4, Year 1	PIU MERMU MBGEANFS	Technical Consultancy (TC) (\$130,000)	Consultant's Report	
	Number of PAs	0.00	4.00	Management Plans for 3 national parks & WNT	Q3, Y1 - Q1, Y2	PIU MERMU MBGEANFS	Technical Consultancy (TC) for 3 national parks & WNT (\$230,000) TC for land tenure & legislative arrangements (\$90,000) TC for social-economic analysis (\$20,000) TC for assessment of value of ecosystem (\$90,000) TC for biodiversity planning (\$70,000) TC to conduct assessment and implementation plan (\$70,000)	Plan documents Technical reports, including recommendations & Agreements	

Objective	Indicator	Baseline	End Target	Activity	Time Frame	Responsible Agency	Resources	Verification Sources	Status*
							Office & field tools & equipment (\$60,000)		
To build capacity for protected area planning	Number of trainees disaggregated by gender	0.00	200.00	Training programme for sustainable national park management, with gender inclusion incorporated	Y 1 – Y 5	PIU	TC for development of education module & communication plan (\$40,000)	Training material; register of participants	
	Sustainable system in place for community participation in consultative process on parks & protected area management	No	Yes	Representatives of various groups & NGOs (participants in training programme) pass on the training to the wider community	Y1 – Y5	PIU NGOs Bureau of Gender Affairs Youth Division	Personnel resources of the NGOs;	Consultation records; Monitoring reports	
Component 2: Biodiversity and Sustainable Eco-Tourism									
To strengthen key tourism infrastructure & local capacity	Number of facilities	0.00	70.00	Build/upgrade eco-tourism infrastructure	Q2 Y 1 – Q4 Y 2	PIU Forestry & Wild Life Department Contractor	Construction company (\$740,000) TC to update GPS trail system and maps for feeder trails (\$20,000) TC to conduct audit for other eco-tourism areas	Site visits and reports; Structures in place System in place; Maps available	

Objective	Indicator	Baseline	End Target	Activity	Time Frame	Responsible Agency	Resources	Verification Sources	Status*
							& design implementation plan (\$110,000) Equipment for improvement of eco-tourism trail (\$70,000)	Documents & Implementation Plan Equipment in place	
	Number trained	0.00	50.00	Training programme for beneficiaries in eco-tourism trail management and gender inclusion		PIU	Consultancy for capacity building programme for national parks & Kalinago (\$110,000)	Graduates engaged in trail management either as volunteers or as paid labour Monitoring & Evaluation Reports	
	Number of systems	0.00	1.00	Establishment of E-ticketing system	Q2, Y 1 – Q4, Y 1	PIU Forestry & Wildlife Department	Technical Specialist for implementation, maintenance & operation of E-ticketing system (\$70,000);	System tested & operational; Software guarantees secured; contractual arrangements for system debugging included	

Objective	Indicator	Baseline	End Target	Activity	Time Frame	Responsible Agency	Resources	Verification Sources	Status*
							TC for implementation of online platform (\$150,000); Equipment for e-ticketing system, control & training (\$180,000)	Platform tested & operational	
	Number of personnel	0.00	2.00	Programme coordination & administration Component 2	Y 1 – Y5	PIU	Project Coordinator & Financial Specialist (\$300,000)	Personnel in place	
Component 3: Sustainable Livelihoods									
To enhance opportunities for biodiversity-derived sustainable livelihoods	Number of beneficiaries	0.00	250.00	Promoting sustainable livelihoods	Y1 – Y5	PIU Kalinago Council	Cooperative for farine & craft (\$90,000) Upgraded propagation centre in Salybia (\$180,000) Equipment for cooperative (\$20,000) TC for fishing & aquaculture development (Crayfish River) Kalinago Territory & provision of tools (\$80,000)	Survey/Site visits and reports	
	Number of hectares in	0.00	3,700.00	Development of land use management plan for Kalinago	Y1 – Y2	PIU	TC for mapping & planning (\$111,000)	Plan document	

Objective	Indicator	Baseline	End Target	Activity	Time Frame	Responsible Agency	Resources	Verification Sources	Status*
	improved plan					Forestry & Wildlife Department			
	Number	0.00	6.00	Auditing and upgrading of tourism facilities	Year 1	PIU Kalinago Council	Audit (\$20,000); Upgrading facilities (\$90,000) Upgrading feeder trails linking to WNT (\$40,000)	Audit document Site visit and report Site visit and report	
	Number of beneficiaries disaggregated by gender	0.00	76	Training programme in Kalinago entrepreneurship, gender inclusion and traditional knowledge	Y1 – Y5	PIU Kalinago Council	Training for farine/toloman (\$30,000) & canoe building & basketry (\$10,000); Equipment upgrade for farine/toloman (\$20,000)	Training modules & register of participants by gender; Record of new businesses established	
To provide appropriate support to local initiatives in agriculture and land use	Number	0.00	2.00	Technical advisory services	Y1 Y1	PIU Kalinago Council	Technical advisor indigenous communities/agriculture and land (\$70,000); Development of traditional agricultural model farm (\$40,000)	Review of outputs against TOR Site visit and report	
Component 4: Project Management									
To ensure successful management, monitoring &	Number of personnel	0.00	3.00	Project Management, Monitoring & Evaluation Provisions	Y1 – Y5	PIU MERMKU MBGEANFS	Social and Environmental Specialist (\$90,000) Audit (\$20,000)	Monitoring reports Community feedback	

Objective	Indicator	Baseline	End Target	Activity	Time Frame	Responsible Agency	Resources	Verification Sources	Status*
evaluation of Project						Physical Planning Department Lands & Surveys	Mid-term & Final Review (\$50,000) Final Term Review (\$10,000)		

Notes: *Status denoted by: NS -not started; S – started; WA – well advanced; C – completed

TC – Technical Consultancy; Y – Year– Q - Quarter

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Table 3: Implementation Plan, Mitigation Actions Addressing Restrictions to Access to Land and Natural Resources

Issue	Mitigation Objective	Indicator	Baseline (Year 0)	End Target	Activity	Timeframe	Responsible Agency	Resources	Verification	Status*
Potential restrictions on traditional land rights/land use in the buffer zone & national parks	To maintain livelihoods	% of PAPs with interest in this arrangement	0.00	10.00	Provision of alternative sites/land exchange	Before project start-up (by end Q4, Y0)	PIU MERMKU Forestry Division MBGEANFS	Land survey and valuation; Compensation for crop loss	Signed agreement; monitoring reports	
		% of PAPs with interest in this option	0.00	50.00	Shift to alternative cropping patterns	Before project start-up	PIU Forestry Department MBGEANFS	Extension services & inputs; Transitional compensation	Monitoring reports	
		% of PAPs with interest in this option	0.00	30.00	Land sale	Before project start-up	PIU Lands & Surveys Department Forestry Department	Land survey, valuation and compensation	Signed agreement; monitoring report	
		% of PAPs with interest in this option	0.00	10.00	Shift to eco-tourism alternative	Before project start-up	PIU Forestry Department	Technical & advisory services; compensation for loss of income	Monitoring reports	
Potential restrictions on access to natural resources – land and	To maintain livelihoods	% of affected Kalinago consenting to relocation	0.00	80.00	Provision of substitutes/alternative sites or compensation	Before restriction is put into effect	PIU Forestry Department Kalinago Council Lands & Survey Department	Identification & costing of sites & services in the Kalinago Territory by Lands & Surveys Department	Monitoring Reports	

Issue	Mitigation Objective	Indicator	Baseline (Year 0)	End Target	Activity	Timeframe	Responsible Agency	Resources	Verification	Status*
marine. Examples: Kalinago may be required to relocate from water catchment areas Tour guides in the marine environment In the Cabrits may experience restrictions							Physical Planning Department	and Physical Planning Department		
		% of Tour guides satisfied with arrangements	0.00	90%	Provision of equipment	Before restriction is put in place	PIU Forestry Department Cottage Village Council	Compensation e.g. glass bottom boat (\$20,000); Advisory services	Inspection; Monitoring report	

Notes: *Status denoted by NS – not started; S – started; WA – well advanced; C – completed

Q – quarter; Y – year; PAP – project affected people

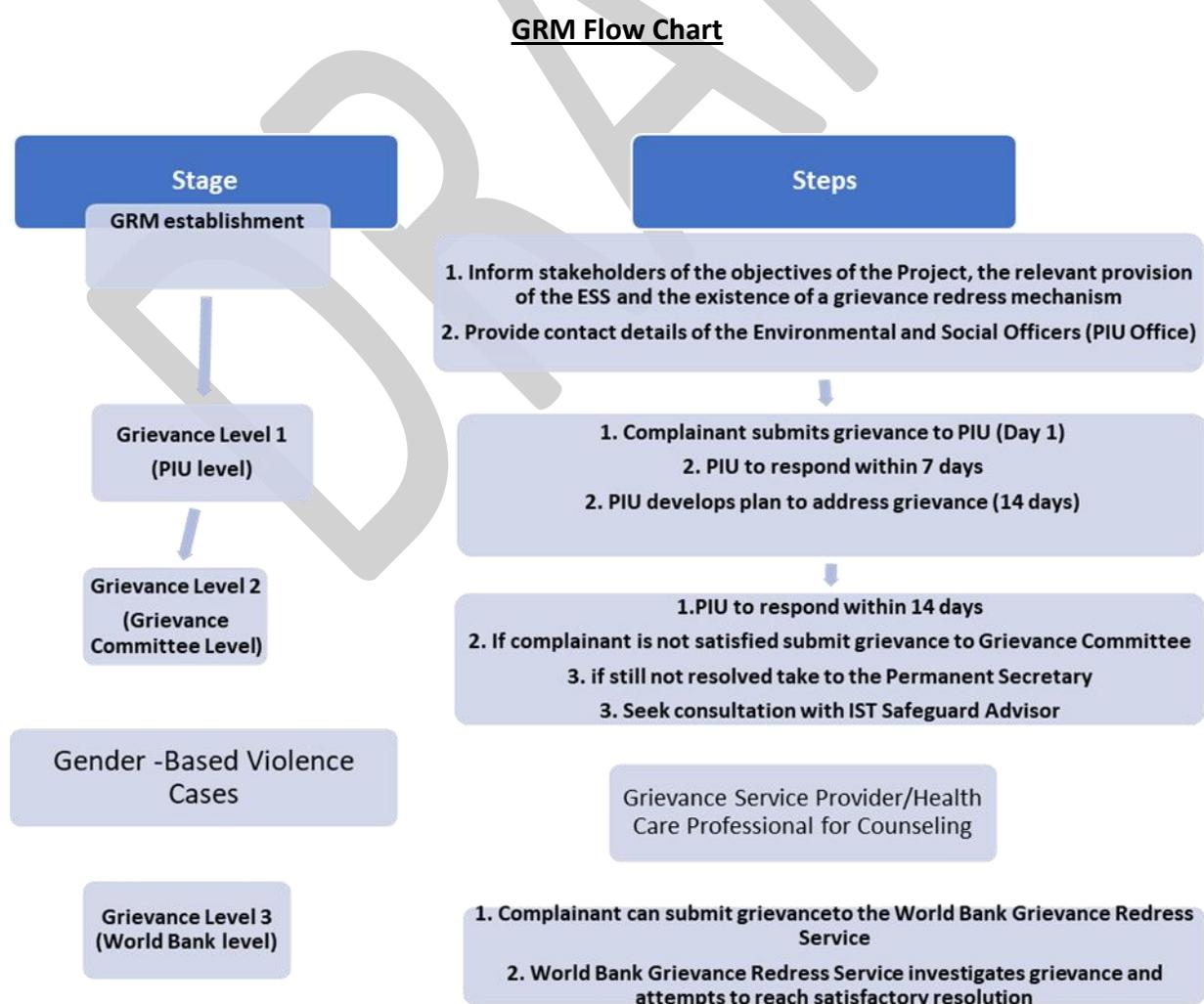
Grievance Redress Mechanism (GRM)

Stakeholder consultations are designed to provide full disclosure on the Project and to engage the participation of the affected communities in the various phases – from design to operation. It is hoped that these consultations would serve, *inter alia*, to minimize disagreements and grievances among members of the communities. Nevertheless, provisions have to be made for dispute settlement and grievance redress, in the event that they are needed. Within the context of the Process Framework, the type of grievances that could arise include dissatisfaction with the terms for land transfer, disputes over the loss of access to natural resources, disagreement with the eligibility criteria for access to mitigation measures; as well as gender issues in terms of access to natural resources.

The objectives of the GRM are to establish simple, clear and easily understood procedures to enable the recording, investigating and settlement of complaints and grievances brought by the stakeholders; to ensure the documentation and compilation of complaints/grievances to facilitate monitoring and continuous improvement in the performance of the PIU through analysis of trends and lessons learnt.

Grievance Mechanism with Flow Chart

The diagram below presents the flow chart for the GRM presented in the Stakeholder Engagement Plan which will be used in collaboration with the specific GRM in the Labour Management Plan, and the specific GRM in the Gender Assessment with the latter calling for special procedures (outlined in the next subsection), because of the high level of confidentiality required. All GRM processes are subject to the relevant national laws. Also note that physical addresses specified in the procedures are tentative.



The GRM will enable the PIU to address any grievances against the Project and project activities relating to participation of stakeholders in the sensitization and decision-making regarding project activities, risk

mitigation plans and implementation. The Administrative Officer, the Environmental Officer and the Social Officer will be all three responsible for registering, tracking, addressing and resolving any complaints raised by individuals or groups in connection to the Project in a single GRM database. The PIU will maintain a Data Base, managed by the Administrative Officer, to log all complaints and to track each one from date received to date resolved and highlight how each case was investigated and resolved. The GRM allows for complaints to be submitted to the PIU anonymously, online, phone, email, letter and in person, as referenced below. Regardless of the means of communication of complaints in connection to the Project, they shall be logged in the GRM database for this Project.

- In person: EALCRP PIU, 19 King George V St., Roseau
- Letter: Attention Project Manager, EALCRP PIU, 19 King George V St., Roseau
- Phone: 266 3998
- Email: grmgef@dominica.gov.dm
- Anonymous: phone, email, letter, etc.

Grievance reports will be prepared on a monthly basis by the PIU and will include a name, date and contact information with a detailed description of the case and complainant and steps taken with a timeframe for resolving complaints, and the accountable staff of the PIU responsible for handling the grievance.

It is expected that there will be a normal response time of 7 days for each case; those that cannot be resolved by the PIU and must be referred to the Grievance Committee to be addressed will require a longer time for a resolution up to 14 or more days to respond. The PIU will include all details of all grievances received in the Project GRM in its Project reports to be submitted on a quarterly basis to the World Bank, and shall notify the World Bank promptly (no later than 48 hours from taking notice of occurrence) of any serious Project grievance or accident or incident. Complaints not resolved by the PIU within 14 days will be referred to the Grievance Committee (GC) for deliberation and recommendations to resolve complaints. Complaints not resolved by the GC will be referred to the Permanent Secretary of the Ministry of Blue and Green Economy, Agriculture and National Food Security, who will engage with the PIU Project Manager. These complaints will also be recorded and tracked by the Administrative Officer and the Environmental and Social Officers. All GRM records will also be available to WB staff during supervision missions, in addition to details on grievances being provided in Project reports, as outlined above.

Gender-Based Violence (GBV) Grievance Redress Mechanism (GRM)

This Project is not considered high-risk for sexual exploitation and abuse (SEA) and sexual harassment (SH) cases. However, occasional cases of SEA and SH can occur, can be very sensitive and may not be reported due to the risks of stigmatization, rejection and reprisals against victims/survivors. This risk creates and reinforces a culture of silence of survivors who may be unwilling to approach the PIU directly. To enable such victims to safely access grievance mechanisms, the PIU will put in place additional channels for mitigating and registering complaints in a safe and confidential manner, including seeking a GBV service provider or Counselling Services, or family Health Care Professional to manage investigation and resolution of grievances and where necessary to support SEA/SH survivors immediately after receiving a complaint and beyond closure of complaint.

The following procedures are specific to gender issues with the objective of enabling the PIU to address any grievance in connection with project-related sexual harassment (SH) and sexual exploitation and abuse (SEA) in a very confidential manner and in compliance with the provisions of the relevant national laws, specifically the Protection Against Domestic Violence Act 2001 and the Sexual Offences Act of 1998.

A special channel will be devoted to SH/SEA issues in this GRM. In this regard, the PIU through the Permanent Secretary (PS) in the Ministry of BGEANFS, will secure support services from a GBV practitioner in managing and resolution of SH/SEA grievances/complaints.

This GRM also allows for complaints to be submitted to the PIU anonymously, online, phone, email, letter and in person through any one of the following 5 options:

- In-person: Social Officer: PIU, 19 King George V St., Roseau or designated GBV service provider
- Letter: Attention Project Manager, PIU, 19 King George V St., Roseau
- Phone: 266 3998
- Email: grmgbvgef@dominica.gov.dm. **This dedicated email account is established for GBV complaints. This could be linked to the Social Worker, Bureau of Gender Affairs, a GBV service provider).** The Director of Gender Affairs has given a commitment to assist, noting that the Social Worker also has the back-up of a Counsellor based in the same Ministry (Ministry of Youth Development and Empowerment, Youth at Risk, Gender Affairs, Seniors Security and Dominicans with Disabilities).
- Anonymous : phone, email, letter, etc.

Significantly, unlike the other GRMs under this project, a dedicated email account directed to the in-box of the identified GBV practitioner is added among the options for submitting complaints.

All complaints will be reviewed and investigated by the Social Officer and GBV practitioner/service provider, who will then prepare a report with recommendations and clear justification for the recommendations. The meeting will be chaired by the GBV practitioner and the Report will be prepared and submitted to the PIU Manager by the Social Officer, under confidential cover.

It is expected that there will be a normal response time of 7 days for each case, however depending on the nature of the complaint, on the determination of the GBV practitioner the survivor complainant may be contacted immediately; more complex cases may require up to 14 days to respond, and the complainant will be informed accordingly of the extension of the timeframe for response as well as who is responsible for the resolution of the complaint submitted.

Complaints not resolved by the PIU (at the level of the Social Officer and GBV practitioner will be referred for further consideration at a further meeting of the Social Officer and GBV practitioner but chaired by the PS MBGEANFS.

Regarding data management, the PIU will maintain a data base, managed by the Social Officer, who will also submit a monthly grievance report to the PIU Manager.

Grievance reports will include a name, date of receipt and resolution, contact information with a detailed description of each case and how it was investigated and resolved.

The Social Officer will be responsible for registering, and tracking all complaints received.

The procedures for this GRM are summarised below:

1. **Receipt of Complaints:** through any of the channels listed above and entered in a separate GBV complaints register at the PIU will be channelled to the GBV service provider by the Social Officer.
2. **Recording of complaints:** The Social Officer and the GBV service provider will collaborate to maintain respectively, updated GBV complaints which record:

- gender of complainant
- name of complainant where available
- channel and date of receipt of complaint
- age of complainant where available
- address of complainant where available
- investigation procedure
- action recommended
- action taken

3. **Review of complaint:**

-The Social Officer and GBV service provider convene a meeting within **3 days** of receiving the complaint (could be via digital platform), so the two of them can discuss the complaint and

determine necessary action/next steps. If deemed necessary, contact will be made by the GBV service provider with the complainant/survivor immediately.

-The Social Officer and GBV service provider will ensure that their recommended action should be compliant with gender policy of the project and the national legislative and regulatory framework regarding GBV.

-In the event of deciding on a resolution of the complaint at this level, the PS Gender Affairs will be invited to meet with the Social Officer and the GBV service provider as chair of a review meeting, with a view to arriving at a final decision on action to be taken.

- Decision on action to be taken communicated with PIU Manager by the Social Officer under confidential cover.

4. Communication with complainant/survivor:

-The GBV service provider, on behalf of the PIU Manager, will communicate with the complainant/survivor within **7 days (or before if deemed necessary)** on action to be taken/ next steps. If decision has not been taken by then, the communication will acknowledge receipt, apologise for delay in taking action and propose a date by which communication of decision on action to be taken will be sent.

5. Taking of action and closure:

-The GBV service provider will implement/coordinate implementation of action with the support of the Social Officer.

-The GBV service provider will prepare a report on implementation of the actions in collaboration with the Social Officer and submit to the PIU Manager under confidential cover.

-Based on this Confidential Report the PIU Manager will issue a letter of closure to the complainant/survivor.

6. Monitoring of outcomes:

This monitoring function is especially critical, because of the risk of re-victimisation and re-traumatizing of survivors.

-The Social Officer will therefore continue to monitor and will update the PIU Project Manager on a quarterly basis.

-On agreement by the survivor, the PIU will make available to the survivor counselling services on a quarterly basis during the first year after closure of the action.

The consultations with stakeholders will seek feedback for finalizing the above grievance report and resolution process. Feedback will be sought, for example, from Village Councils, Kalinago Council, health providers, etc.

Non Retaliation Statement

The World Bank and the Ministry of Blue, Green Economy, Agriculture and National Food Security will ensure that there is no coercion, retaliation, intimidation, or harassment directed against any Stakeholder or Beneficiary who makes a report or comment during stakeholder consultation or in a public meeting organized by the Project. If any Stakeholder or Beneficiary feels that he or she has been retaliated against for making a report or participating in the stakeholder consultation, the alleged violation should be reported using the Grievance Redress Mechanism.

Public consultation and disclosure

The World Bank is committed to full and effective disclosure and, therefore, all project reports will be made public. Emphasis will be placed on the accessibility of information disseminated, especially among vulnerable and physically handicapped stakeholder segments. The Process Framework was consulted on during various stages of its preparation. In the consultations held with the Roseau Valley representatives, with the Cottage Village Council and the Kalinago Council, discussions were held on the potential implications of the Project on access to land and natural resources. In addition, the draft Process Framework was presented and consulted on at the public consultations targeted at the West Coast villages and Portsmouth; and at the Kalinago Territory. The feedback could be summarized as follows:

- In the case of the Roseau Valley area, while no significant loss of access to natural resources was anticipated from the development of the management plan for the Morne Trois Pitons National Park or from the development of the buffer zone, which is outside of the scope of this Project, there would be land ownership and use rights issues, in connection with land bequeathed to former workers by a benefactor, but for which titles have not been established.
- With regard to the Kalinago, the issues included the practice of building around water catchment areas and access to the forest for firewood, which however, is used mainly as a backup fuel for cooking. In the event that the proposed planning and demarcation of the Kalinago Territory calls for relocation of persons from their residences or from their means of livelihood, the Directors of the Physical Planning and the Lands and Survey Divisions, have committed to assisting the Kalinago Chief in identifying suitable areas for re-location. Any proposed measures taken will be done in a culturally appropriate manner and with the input of the Kalinago people.
- The farmers of the West Coast have adopted a wait and see attitude towards the various options that might accompany the setting up of a buffer zone around the Morne Diablotin National Park, the implementation of which is outside the scope of the Project. However, if shifting out of agriculture was found to be beneficial, they might be persuaded to shift to alternative crops or livelihoods. The issue of a transition period and the compensation to facilitate any such shift was raised. Moreover, the Mayor of Portsmouth was concerned about the risk to farmers' livelihoods that could result from the implementation of the proposed buffer zone and recommended that, not only should the Ministry of Agriculture be engaged, but also the Dominica Export/Import Agency (DEXIA) should be co-opted to address the marketing aspect.
- With regard to the marine section of the Cabrits National Park, the consultations revealed that there are user conflict issues that could be resolved by the updating of the Management Plan. In addition, it was noted that practices such as spear fishing were having negative impacts on the biodiversity of the marine environment. However, there was also concern by the Cottage Village Council that the management plan could result in restrictions to access, thus impacting livelihoods such as tour guiding by the youth in the TanTan area. The Council recommended early consultation with stakeholders.

ANNEXES

Annex 1

Responses to Informal Questionnaire to Guide Consultation with the Town/Village Councils and Community Representatives Leveraging Eco-Tourism For Biodiversity Protection Project

Introduction

The Leveraging Eco-Tourism for Biodiversity Protection Project is intended to improve the management of the Waitukubuli National Trail and the three national parks, namely the Trois Pitons National Park, the Cabrits National Park and the Morne Diablotin National Park; as well as to promote sustainable livelihoods for the populations in the affected areas. The Project will repair or construct amenities such as interpretation centres, trails, benches, restrooms, gazebos, shelters and viewing platforms. It will also develop an e-ticketing system that will be linked to digital maps and information, thus upgrading the service to potential visitors to the parks and trail. It will also assist with the administration of visitation to the parks. Women, youth and the Kalinago people are considered vulnerable and are therefore singled out for special consideration. The Project will establish a buffer zone around the Morne Diablotin National Park and will, among other things, begin the process for undertaking a mapping and land use plan for the Kalinago Territory.

We would appreciate if you could spend a few minutes of your time to answer some questions that would provide us with a better understanding of the socio-economic situation of your community as well as present your views on how the Project is likely to impact your community.

Name of Village/Town Council **Kalinago Council**

Date of Interview **July 31 2021**

Present Were:

Chief Lorenzo Sandford

Alexander Burton, Councillor

Anthony Lucien, Councillor for Agriculture and Fisheries

Diane Darroux, Clerk

Ronald Charles, Forestry Specialist PIU

Lucilla Lewis, Consultant's Associate

Livelihoods and Quality of Life

- 1) What are the main economic activities in the community? Please rank from them from 1 to 5, with 1 being the highest and 5 being the lowest

Farming 1
 Fishing 4
 Tourism 3
 Agro-processing 5
 Craft 2
 Other (specify) _____

It was noted that currently all fishing is done in Marigot, because of the docking facilities there. One or two operators fish from the rock.

- 2) Please provide an estimate of the number or percentage of male and female operators engaged in specific economic activities:

Activity	Male		Female	
	Number	%	Number	%
Farming		60		40
Fishing		98 - 99		1 - 2
Tourism		40		60
Agro-processing		80		20
Craft		50		50

- 3) Please give an estimate of the number of businesses whose livelihoods are linked to the National Park or Trail _____
 4) What type of businesses are they?

The Barana Aute is a direct beneficiary of the WNT, which passes near it. The Barana Aute, which promotes the history and culture of the Kalinago people engages a dance group, elders who sell craft, a cassava baker, a food service provider and about 20 tour guides. Farmers and fishermen benefit indirectly as providers of produce to the kitchen. At least one accommodation provider benefits from the WNT.

It was noted that the WNT (management) could assist in putting up stalls where people could sell their products to hikers on the trail. The people do not benefit from overnight stays. In addition, there are other sites that could be explored. An example is the Magini Region to which the legend of L'Escalier Tete Chien is linked. The Turtle Pool – Basin Tortue is another attraction. In addition, there is a cemetery near Salybia Church – where a number of Germans had been buried. A German ship had been torpedoed outside of the Kalinago Territory during World War II and the bodies were washed up on the shore. Some Germans visited the site, indicating that there could be potential link with the tourist trade.

- 5) How has the COVID-19 Pandemic impacted the economic activities identified above?

COVID-19 brought everything to a standstill, especially the craft industry.

- 6) Please list the education facilities located in your community (primary, secondary etc.)
-

There are five primary schools, one located in each of the following: Sinecou, Salybia, Concord, Lighthouse and Atkinson. There are 5 pre-schools and 1 Special Education facility. For secondary education, students go to the North East Comprehensive or the Castle Bruce Secondary School.

7) Please list the health facilities located in your community

There are 3 health centres located in Atkinson, Salybia and Mahaut River. Referrals are made to Level III centres in Marigot and Castle Bruce. People living in the North go to Marigot and those in the South go to Castle Bruce.

Land Use, Rights and Restrictions to Access

8) What do you think the positive impacts of the project might be?

The project will have positive impacts all-round – mainly for the tourism aspect; the people will gain knowledge of the planning and also of the timing for planting crops. For example, root crops remain underground during a storm. We tend to plant anytime, thinking that a storm won't come. The use of the land has always been good for us – a people of hunters and gatherers. We are grateful for the wealth of knowledge the project will bring. There will be a two-way flow of knowledge. The Councillor for Agriculture and Fisheries will be supervising a plant nursery and can concentrate on the foods that help in the prevention of cancer.

Land use policy is the way forward. We need to educate our people. We also do not want pesticides getting into the water. Lots of people construct across water catchments. Relocation is a possibility.

We are not producing in the KT. We need a large injection of finance. We don't have a cash crop that is dependable as in the day of bananas. We need money for hiring labour. Marketing is a big issue.

9) What do you think the negative impacts of the project might be?

The people have an emotional attachment to their location. Some families have a small portion of land and are emotionally attached to it. There could be negative impacts of the land use mapping and planning process, given people's reluctance to part with their traditional land rights. In the past 10 families controlled the land. Currently there are many farmers.

10) Are there members of the community who have had traditional rights (quite apart from legal ownership) to the land and could be displaced as a result of the demarcation, land use planning and/or the buffer zone?

There is the possibility that the land use planning process could lead to displacement, given the water catchment and other issues associated with current land use practices. However, the Council has little leeway in relocating people. There are no lands that could be re-allocated.

11) If so, are they mainly men, women or youth?

12) **Specific to settlements around the Morne Diablotin National Park**, are there persons who own lands within the proposed buffer zone?

Yes _____ No _____

13) Are there natural resources that members of the community typically gather from within the protected area or areas that could be restricted by the Project (examples could be water, raw materials, firewood)?

Yes _____X_____ No _____

14) If Yes, please name them

Firewood is not used as much as before. All homes have the traditional fire wood system, but for use as a backup. After Hurricane Maria, people had to revert to drying meat, as there was no electricity. There is still interest in charcoal burning for use in barbecues. Most people are connected to DOWASCO for the water. However, in the district of Tuna Village/Concord, people are not dependent on DOWASCO. They go to the spring water sources. Spring water production could be a viable project in the KT.

15) If Yes, who are the main users of these resources (are they men, women or youth)?

16) **Specific to the Kalinago**, please explain the procedures for assigning land for individual or family use within the communal land ownership system

There is very little leeway in terms of available land. The Council does not have land to allocate. Some persons have large tracts of land through inheritance. A father usually wants to give each child a piece. The Council can negotiate with someone who wants to sell. However, it is not the land that is sold. It is the loss of use as well as the agricultural crops that are sold.

17) What do you think are the most pressing land use issues in your community?

Construction around water catchment areas

Dispute Resolution and the Grievance Redress Mechanism

18) How are disputes relating to land tenure and resources settled in your community?

The Council has special days when people can come in to lodge complaints. They pay the Council a fee. The Council visits the area and investigates. They then settle the dispute. Boundary moving disputes are the most common.

19) In your view are there any gender related issues that affect access to land and dispute settlement?

None.

20) Is there an individual, agency or entity where you can report community related issues (e.g. land disputes and issues)?

Specific to the Kalinago:

It is intended that the project promote the diversification of livelihood activities for 250 beneficiaries and train 76 beneficiaries in Kalinago entrepreneurship and traditional knowledge, under Component 3, which is targeted at the Kalinago community, in particular women and youth. The following activities have so far been identified:

- Marketing of agricultural products
- Gastronomy/food experiences
- Plant materials for craft making (Iarouma, calabash etc.)
- Cooperative and seed propagation

21) Do you agree with these priorities

Yes X No

22) Do you have other priorities? If so, please state them

Fishing: We had boats where I grew up. Each fisherman had his boat and made his canoe. Now, everything is diverted to Marigot and transferred to Roseau. There is a scarcity of fresh fish. We have lost the culture of canoe making and fishing. The young are not interested in fishing. The Council has discussed the idea of upgrading the landing sites. Aqua-culture is an idea and would be suitable for Cray Fish River – a good source of shrimp. The river is small because of tree cutting; but the decline of the banana industry, with reduction in pesticide use, has led to the increase in the production of cray fish. We need financial assistance and technical advice in this area.

Specific to the Portsmouth and Tan Tan to Cottage Communities

23) Are there livelihood needs in the case of vulnerable women and youth that this project might address?

Yes No

24) If yes, please explain

ADDITIONAL INFORMATION

Gender Issues

Women's Groups

Cray Fish River's Concerned Women (not active)

Waikada (active)

Hamlet Development committees in St Cyre, Gullet River, Concord

The Council has also been in touch with Miss Paula Williams of the Division of Cooperatives

July 2021

Annex 2

Responses to Informal Questionnaire to Guide Consultation with the Town/Village Councils and Community Representatives

Leveraging Eco-Tourism For Biodiversity Protection Project

Introduction

The Leveraging Eco-Tourism for Biodiversity Protection Project is intended to improve the management of the Waitukubuli National Trail and the three national parks, namely the Trois Pitons National Park, the Cabrits National Park and the Morne Diablotin National Park; as well as to promote sustainable livelihoods for the populations in the affected areas. The Project will repair or construct amenities such as interpretation centres, trails, benches, restrooms, gazebos, shelters and viewing platforms. It will also develop an e-ticketing system that will be linked to digital maps and information, thus upgrading the service to potential visitors to the parks and trail. It will also assist with the administration of visitation to the parks. Women, youth and the Kalinago people are considered vulnerable and are therefore singled out for special consideration. The Project will establish a buffer zone around the Morne Diablotin National Park and will, among other things, begin the process for undertaking a mapping and land use plan for the Kalinago Territory.

We would appreciate if you could spend a few minutes of your time to answer some questions that would provide us with a better understanding of the socio-economic situation of your community as well as present your views on how the Project is likely to impact your community.

Name of Village/Town Council Cottage Village Council

Date of Interview Sunday, August 8th 2021

Present Were:

Caryl Baron, Deputy Chair

Katherine Joseph-Caram, Councillor

Ronald Charles, PIU Forest Specialist

Jaqueline Andre, Forest Officer, Forestry and Wild Life Department

Lucilla Lewis, Social Safeguards Consultant's Associate

Sylvia Charles, Social Safeguards Consultant

Livelihoods and Quality of Life

25) What are the main economic activities in the community? Please rank from them from 1 to 5, with 1 being the highest and 5 being the lowest

Farming ___ 3 ___

Fishing ___ 1 ___

Tourism ___ 2 ___

Agro-processing _____

Craft _____

Other (specify) _Scuba Diving 4_____

26) Please provide an estimate of the number or percentage of male and female operators engaged in specific economic activities:

Activity	Male		Female	
	Number	%	Number	%
Farming				
Fishing*		50		50
Tourism				
Agro-processing				
Craft				

*Men do the fishing; women are involved in pulling the seine.

27) Please give an estimate of the number of businesses whose livelihoods are linked to the National Park or Trail _____70%_____

28) What type of businesses are they?

- _____

_ Tour guides take tourists to the park, mini water fall, Cold Soufriere – all linked to the park

- Number of accommodations: 15 – 20, men own the rooms
- Women do catering (7 – 8 women)
- Most workers are women
- The majority (80%) of tour guides are young men

29) How has the COVID-19 Pandemic impacted the economic activities identified above?

COVID has drastically affected us. The tourists are unable to interact with us and vice versa

30) Please list the education facilities located in your community (primary, secondary etc.)

_Savanne Paille Primary School serves from Portsmouth to as far as Clifton.

Secondary: Portsmouth Secondary; St Johns Academy; Seven Day's Adventist

31) Please list the health facilities located in your community

- 1 clinic located in Clifton; but ground breaking has been done in Savanne Paille for a Health & Wellness Centre
 - Services provided in the Portsmouth Health and Wellness Centre and the RFA Hospital
- _____

Land Use, Rights and Restrictions to Access

32) What do you think the positive impacts of the project might be?

The area stretching from the Cabrits, moving up along the seaside is mostly owned by Government. We don't know who occupies these lands. From Tan Tan to Lamothe, all is private land.

33) What do you think the negative impacts of the project might be?

Most of the scuba diving is done in Toucarie. Tourists do the diving, including looking for dive wrecks from the colonial past. People are not likely to accept the restrictions. Once there are restrictions, there will be negative reactions. One should engage the people first. They would want to know if this is being done, how will it benefit them.

Private land owners may also react.

Comment by Team: If yachting is done, dropping anchors in certain areas need to be avoided. To operate within regulation should not be too much of a problem. It is a matter of understanding the science and to link it with the socio-economic livelihoods. There is need for micro management plans setting out zoning for fishing, agriculture and tourism.

The SEP will present the science issues. That will be part of the stakeholder engagement plan. Mitigation plans will be presented.

34) Are there members of the community who have had traditional rights (quite apart from legal ownership) to the land and could be displaced as a result of the demarcation, land use planning and/or the buffer zone? If the upgraded plan establishes restrictions, how is this likely to affect you?

35) If so, are they mainly men, women or youth?

36) **Specific to settlements around the Morne Diablotin National Park**, are there persons who own lands within the proposed buffer zone?

Yes _____ No _____

37) Are there natural resources that members of the community typically gather from within the protected area or areas that could be restricted by the Project (examples could be water, raw materials, firewood)?

Yes _____ No _____

38) If Yes, please name them

No restrictions on the quantum of fishing. There is an issue with spearfishing. Gathering firewood may not exist anymore, because the Park is well policed. People hunt crabs in the Cabrits. They are not an endangered species, but are protected under the Act.

39) If Yes, who are the main users of these resources (are they men, women or youth)?

40) **Specific to the Kalinago**, please explain the procedures for assigning land for individual or family use within the communal land ownership system

41) What do you think are the most pressing land use issues in your community?

Erosion during the hurricanes and other natural events. We had a problem with people throwing garbage into the sea, but it has been curbed. There has been an issue of building materials being thrown over the cliff and the burning of debris on the seaside and leaving galvanize on the seaside.

There is an issue of lack of toilets in the area from the Cabrits up to Lamothe (The Parks stretches from Purple Turtle Beach up to Lamothe). In the further design of the Project, the community should give inputs as to where the activities will be located.

There is an issue of the construction activity in the area, for example, the Cotton Hill housing, where waste water is coming down. More and more housing leads to more waste. When implementation takes place, we lack follow-up. Most times, when projects come on stream, they lapse. We put plans in place for young people & leave them on their own. Need to do follow-up. On behalf of the Council, we will stay engaged.

PIU response: The issue of developments has to do with planning. There are issues of drainage, liquid and solid waste. It can be an activity of the Project to look at the impact of those developments in the area.

Dispute Resolution and the Grievance Redress Mechanism

42) How are disputes relating to land tenure and resources settled in your community?

If it is a simple matter, the Council deals with it. The complaint is lodged with the Council, discussed at a meeting and the Council visits the area, then returns and makes a decision. This is communicated to the persons and the matter is resolved.

If people have disputes, fighting for land, that is a legal matter, but people know their boundaries.

43) In your view are there any gender related issues that affect access to land and dispute settlement?

None.

44) Is there an individual, agency or entity where you can report community related issues (e.g. land disputes and issues)?

Specific to the Kalinago:

It is intended that the project promote the diversification of livelihood activities for 250 beneficiaries and train 76 beneficiaries in Kalinago entrepreneurship and traditional knowledge, under Component 3, which is targeted at the Kalinago community, in particular women and youth. The following activities have so far been identified:

- Marketing of agricultural products
- Gastronomy/food experiences
- Plant materials for craft making (larouma, calabash etc.)
- Cooperative and seed propagation

45) Do you agree with these priorities

Yes _____ No _____

46) Do you have other priorities? If so, please state them

Specific to the Portsmouth and Tan Tan to Cottage Communities

47) Are there livelihood needs in the case of vulnerable women and youth that this project might address?

Yes No _____

48) If yes, please explain

Would like to do a meat drying project for women. Also, a glass bottom boat for the young men who work as tour guides in the marine park would help them to maintain their livelihood.

ADDITIONAL INFORMATION

One of the Councillors flagged an issue, that of a lady conducting horseback rides in the vicinity of the Kempinski Hotel. It was felt that it is a good business (recommended in the OPAL Project), but the bathing of the horse in the sea was thought to be unhygienic and should be looked into by the Environmental Health Department.

The Forest Officer informed that livelihoods assessment had been done under the OPAL Project. Boats and life vests had been provided and that an assessment needs to be done. She supported the idea of the glass bottom boat.

Composition of the Village Council: 7 Councillors, of which 5 are women. The Council is chaired by Mr Brenton Mason.

Women's Groups:

There is currently no women's group, but the Council is trying to start one to pursue a smoked meat venture. There is an elderly group and a disaster group.

Issues flagged by the PIU

- Project is in the final design stages
- Traditional users of the Cabrits National Park may be adversely affected by the new activities
- There is talk of the re-alignment of the road to the Cabrits
- How can we assist the traditional users of the park in terms of their livelihoods?

Status of the Plan for the Cabrits – as outlined by the Forest Officer

- The Management Plan done by Marie Jose Edwards was for the marine aspect. The Plan, both the terrestrial and marine aspects, is outdated.

July 2021

DRAFT

Annex 3

Responses to Informal Questionnaire to Guide Consultation with the Town/Village Councils and Community Representatives

Leveraging Eco-Tourism For Biodiversity Protection Project

Introduction

The Leveraging Eco-Tourism for Biodiversity Protection Project is intended to improve the management of the Waitukubuli National Trail and the three national parks, namely the Trois Pitons National Park, the Cabrits National Park and the Morne Diablotin National Park; as well as to promote sustainable livelihoods for the populations in the affected areas. The Project will repair or construct amenities such as interpretation centres, trails, benches, restrooms, gazebos, shelters and viewing platforms. It will also develop an e-ticketing system that will be linked to digital maps and information, thus upgrading the service to potential visitors to the parks and trail. It will also assist with the administration of visitation to the parks. Women, youth and the Kalinago people are considered vulnerable and are therefore singled out for special consideration. The Project will establish a buffer zone around the Morne Diablotin National Park and will, among other things, begin the process for undertaking a mapping and land use plan for the Kalinago Territory.

We would appreciate if you could spend a few minutes of your time to answer some questions that would provide us with a better understanding of the socio-economic situation of your community as well as present your views on how the Project is likely to impact your community.

Name of Village/Town Council: Trafalgar Village Council & Wotten Waven Development Committee

Date of Interview: 4th August 2021

Present Were:

Mr Allan Toussaint, Chairman, Trafalgar Village Council

Ms Abra Lee-Jones, Trafalgar Village Council

Mr George, Deputy Chairman, Wotten Waven Development Committee

Mr Ronald Charles, Forest Specialist PIU; Mr Michael McIntye, Environment Specialist PIU

Sylvia Charles, Social Safeguards Social Safeguards Consultant

Livelihoods and Quality of Life

49) What are the main economic activities in the community? Please rank from them from 1 to 5, with 1 being the highest and 5 being the lowest

Farming 2 (includes livestock and rearing chickens)

Fishing _____

Tourism 1

Agro-processing _____

Craft _____

Other (specify) Horticulture 3

The geothermal is poised to become a significant factor in livelihoods. Most of the farming is done in Morne Prosper.

50) Please provide an estimate of the number or percentage of male and female operators engaged in specific economic activities:

Activity	Male				Female			
	Number		%		Number		%	
	W ¹	T ²						
Farming								
Fishing								
Tourism			60	35			40	65
Agro-processing								
Craft								

1 Wotten Waven; 2 Trafalgar

51) Please give an estimate of the number of businesses whose livelihoods are linked to the National Park or Trail _____

52) What type of businesses are they?

Most businesses have their livelihoods linked to the national park. Segment 3 of the WNT ends there and Segment 4 starts there. There are two (2) spas managed by men. Of 20 vendors, 5 are male and 15 are female. Janitors are usually male.

In the case of Trafalgar, there is a vendor s' association consisting of 20 women. There are some men who sell jelly nuts on a seasonal basis. These account for 2% of the vendors. The other 98 per cent are female. There are 10 bus drivers. However, not all of them are engaged in the tourist trade. There is a single female bus driver among them.

53) How has the COVID-19 Pandemic impacted the economic activities identified above?

COVID-19 has put a dent on economic activities in Wotten Waven. Guest houses are closed. Wotten Waven was once based on agriculture, so people like planting flowers, which are sold in the Roseau market. They used to export flowers. Prior to Hurricane David in 1979, the Island House Hotel exported a significantly large quantity of anthuriums. However, a blight spoiled the industry. Currently we produce ginger lilies. Wotten Waven is known for its health and wellness spas and hot springs.

In the case of Trafalgar, COVID-19 has devastated the economy. Usually, households pay house rates to the Council, but since people were not earning, they were unable to pay the rates. The income earned from house rates was matched by a grant from the Government. Since there were no cruise ships, there was no revenue stream. The facility at the entrance to the Morne Trois Pitons Park is managed by the Council. No tickets were being sold, as a result of the fall off in visitors. There is a restaurant on site, for the use of which a vendor pays rent. The lack of business has affected the Council's revenue. Trafalgar was due to host Heritage Day last year. Cancellation of the activity also led to lost income to villagers.

54) Please list the education facilities located in your community (primary, secondary etc.)

Wotten Waven Primary School with Pre-school that includes a school feeding programme. Trafalgar Primary School, which has two buildings to accommodate the primary and pre-schools.

55) Please list the health facilities located in your community

Wotten Waven has one (1) health centre. A nurse comes every two weeks to carry out tests. Once a month the villagers go to Trafalgar or Morne Prosper for a doctor's visit. Trafalgar has a health centre. The service is provided once or twice a week. Referrals are made to the Roseau Health Centre (a type III facility).

Land Use, Rights and Restrictions to Access

56) What do you think the positive impacts of the project might be?

The project will enable better management of the resource and the community will benefit from what the resource offers.

57) What do you think the negative impacts of the project might be?

The project may result in a few trees being cut down to create some paths. If not done properly, there may be too many persons on the trail at any point in time. This could lead to more trees being cut and to soil erosion. There should be training for locals to manage the area e.g. as park rangers from within the community.

58) Are there members of the community who have had traditional rights (quite apart from legal ownership) to the land and could be displaced as a result of the demarcation, land use planning and/or the buffer zone?

There is some issue in Laudat where some lands have been left for members of the community. They do not have titles. It is unlikely that anyone would be displaced. Perhaps some exotic herbs (marijuana) could be displaced.

59) If so, are they mainly men, women or youth?

The issue of persons with traditional rights affects a whole community. From the experience with the geothermal project, more men than women owned land. This could well be the case in this project.

60) **Specific to settlements around the Morne Diablotin National Park**, are there persons who own lands within the proposed buffer zone?

Yes _____ No _____

61) Are there natural resources that members of the community typically gather from within the protected area or areas that could be restricted by the Project (examples could be water, raw materials, firewood)?

Yes _____ No X _____

62) If Yes, please name them

The water supply to the area comes from within the park, sourced by DOWASCO.

63) If Yes, who are the main users of these resources (are they men, women or youth)?

64) **Specific to the Kalinago**, please explain the procedures for assigning land for individual or family use within the communal land ownership system

65) What do you think are the most pressing land use issues in your community?

After Hurricane Maria, no land is safe. The issues are related to natural occurrences.

Dispute Resolution and the Grievance Redress Mechanism

66) How are disputes relating to land tenure and resources settled in your community?

These are legal issues, which are usually settled through the Lands and Survey Department.

67) In your view are there any gender related issues that affect access to land and dispute settlement?

(See response to question 11)

68) Is there an individual, agency or entity where you can report community related issues (e.g. land disputes and issues)?

Specific to the Kalinago:

It is intended that the project promote the diversification of livelihood activities for 250 beneficiaries and train 76 beneficiaries in Kalinago entrepreneurship and traditional knowledge, under Component 3, which is targeted at the Kalinago community, in particular women and youth. The following activities have so far been identified:

- Marketing of agricultural products
- Gastronomy/food experiences
- Plant materials for craft making (larouma, calabash etc.)
- Cooperative and seed propagation

69) Do you agree with these priorities

Yes _____ No _____

70) Do you have other priorities? If so, please state them

Specific to the Roseau Valley, Portsmouth and Tan Tan to Cottage Communities

71) Are there livelihood needs in the case of vulnerable women and youth that this project might address?

Yes X No _____

72) If yes, please explain

Sometimes it is a bit expensive to adapt to the needs of the disabled.

PIU comment: where the physical conditions permit, this could be addressed.

ADDITONAL INFORMATION

Council/Development Committee Representative:

One is not sure about where the upgrades may happen and who will be affected. You may want to adopt the approach used in the geothermal project; land owners were compensated.

Is the design of the project finalized? For example, where will the amenities be located etc. The stakeholders, because of their knowledge, can help with project design.

PIU Response:

We are in the final stage of project preparation. The project will be reviewed by the World Bank in September or October. Once approved, it goes to the GEF Secretariat by December. Following approval, anticipated in by first quarter of next year, we go back to stakeholders for another round of consultations.

Council/Development Committee Representative:

Will the second round of consultations be held with a different set of stakeholders?

PIU Response:

The need for continuity is recognized. There is also a plan to have wider public consultations.

July 2021

Annex 4

Mixed Face-to-Face and Virtual Consultation with Farmers and Tourism Operators Held at Portsmouth

September 22nd 2021

The consultation was targeted at tourism operators and farmers in the regions covered by the Morne Diablotin National Park and the Cabrits National Park. It commenced with introductory remarks by Ronald Charles, Forestry Officer within the Project Implementation Unit (PIU). This was followed by a presentation on the Project by the Social Safeguards Consultant and one by her Associate.

Introductory Remarks

Ronald Charles informed the meeting that the operators, in the case of the Morne Diablotin National Park, may be required to do things differently, in that they may be required to switch to tree crops. With reference to the Cabrits National Park, more specifically water sports, he noted that zoning may be required. The presentation by the Social Safeguards Consultant covered the project description, objectives, potential benefits and risks and the options open to private landowners in the proposed buffer zone, including eligibility criteria. The Social Safeguards Consultant's team member presented the Gender Assessment, after which the meeting continued into the discussion phase. The presentations along with a guide to the discussions are attached.

Points Raised During Discussions

Assistant Forest Officer:

Much of the emphasis is being placed on the Morne Trois Pitons National Park with regard to tourism. 90 per cent of visitors go to the Emerald Pool and the Trafalgar Falls. How is one going to convince the farmer to go into tourism when the number of visitors is so low?

Forest Officer:

Morne Diablotin has lots of biodiversity, which is attractive to bird watchers. Given that birding is a night or early morning activity, there is an opportunity to set up cottages to encourage overnight stays. There is need for creativity to identify activities that would attract more visitors to the Park.

Farmer Responses/Interventions:

In response to the question as to what crops are currently being grown, a farmer indicated that he grows yams, tannia and limes. He noted that he is trying to grow crops that have a shelf life. Another farmer, when asked about his impressions of the project and the options presented, indicated that he is looking on at the moment. He added that he had been cultivating for twenty (20) years and that once there was a benefit, he would be willing to shift to new crops.

A third farmer said that he would speak when it is closer to the time (for implementation of the buffer zone). Another inquired concerning whether it might be possible to do land exchange.

The Forest Officer was asked to provide the farmers with information on the type of crops that might be compatible with the buffer zone. Her response was that from her department's perspective, it would be agro-forestry, namely crops that can be grown with trees as the shade. However, she added that an agriculturalist would be required to work with the farmers on the appropriate crops.

One of the participants noted that there should be a transition period for making the switch, while another inquired concerning whether there would be compensation.

Mayor of Portsmouth Town Council

Re the buffer zone, which is important, there should be consideration of the impacts it is likely to have on people's livelihoods. Not only should the Ministry of Agriculture be engaged, but also DEXIA should be brought on board to address the marketing aspect. She was interested in how the project would minimize some of the concerns.

Forest Officer

We need to look at how farmers will benefit. There is a lot of abandoned lands. We should try to stimulate activities whereby people can benefit from the park.

Cabrits Dive Central

She is concerned about the state of the moorings. She noted that the moorings were constructed years ago and they have been doing what they can to maintain them. However, one is unable to dive far from the shore. She asked whether the Project was doing anything about the moorings. The response from the PIU was that the views of all operators will be taken into consideration in the management plan.

It was also suggested that this Project could consider establishing garbage collection amenities and toilets along the beach.

A question was asked concerning the timeline for implementation of the project components.

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Annex 5

Mixed Face-to-Face and Virtual Consultation with Kalinago Stakeholders Held at the Salybia Primary School in the Kalinago Territory September 23rd 2021

The consultation was targeted at all stakeholders in the Kalinago Territory to sensitise them to the objectives, benefits and potential risks with considered risk mitigation action and to seek clarification on issues raised in the Draft Indigenous Peoples Plan Framework (IPPF).

Introductory remarks were presented by Ronald Charles, Forestry Officer within the Project Implementation Unit (PIU), followed by a presentation on the Project by the Social Safeguards Consultant and one by her Associate.

Introductory Remarks

Ronald Charles informed the meeting that the funding agency for the project insists on a consultative process with stakeholders, and that this consultation was one of more to come as the project goes through the stages from approval to implementation. Importantly, he highlighted the fact that there would be ample time for input from the Kalinago people towards finalising project activities which preserve Kalinago traditions and customs during the process while creating livelihoods.

The presentation by the Social Safeguards Consultant covered the project description, objectives, potential benefits and risks, the options open to private landowners in the proposed buffer zone, and more specific to the Kalinago people, the access to resources and potential risks in light of the proposed mapping and demarcation. The presentation also included a reference to eligibility criteria. The Consultant's team member led a discussion which sought specific clarifications for updating the Draft IPPF, following which the meeting continued into the discussion phase.

The presentations along with a guide to the discussions are attached to the IPPF and summarised highlights are included in the final update to the Stakeholder Engagement Plan (SEP).

Points Raised During Discussions

General Comments on Project Objectives

Stakeholders were unanimous in welcoming the project as having the potential to create sustainable livelihoods for the Kalinago people. However, it was observed that Tourna/Concord could be considered as a location for the cray fish production project recommended in the Consultation with the Council. It was also suggested that Cray Fish River needs substantial rehabilitation, after having suffered significant degradation. Given that two sites are being suggested, it is recommended that a pre-feasibility study be undertaken as part of the activity (Social Safeguards Consultant).

In addition, concern was raised with the increasing incidence of young farmers not following traditional farming practices e.g. not planting according to the phases of the moon and hence affecting farm productivity, in response to which they recommended that the project provide for groups who want to pursue traditional farming models.

In response to these concerns raised, the PIU representative underscored the fact that the project activities were still being defined and would only be finalised with input from the Kalinago people from consultations like this one.

Senator Sanford expressed her satisfaction with the consultative approach to ensure involvement of the Kalinago people in the planning and implementation process, and highlighted processing and marketing as two areas in which capacity must be built among small businesses in the Territory especially those in Agriculture.

The issue of marketing was suggested by a number of participants as one that needed to be addressed urgently.

Burton pointed out that two approaches to agriculture should be pursued: sustainability by “eating what we grow and growing what we eat”, guided by building resilience to climate change. He therefore suggested activities like smoking of fish, preserving of food to ensure food security when fresh produce is in short supply e.g. because of seasonality and post hurricane disruptions.

He also pointed to the urgent need for capacity building in marketing.

Buffer Zones and Land Rights

Kirk reassured stakeholders that demarcation of land for buffer zones will be done through a participatory process so that all stakeholder issues will be taken on board.

IPP

The Social Safeguards Consultant noted that the Project, in its design, has taken into account the priorities established by the Kalinago in the DVRP Eastern Roads Project, as follows:

- The right to free, prior and informed consultation
- Employment and skills transfer
- Mitigation to treat with potential adverse risks
- Locating the grievance redress mechanism at the local level in the first instance

This point was underscored by the IST Safeguards Specialist who noted that in the case of the World Bank housing project also, consideration was being given to hiring contractors from the local community.

Status of Community Groups

Stakeholders listed the existence of the seven (7) Hamlet Development Committees most of which were active; two (2) sports committees- the Kalinago Sports Association and the KPL; two cultural groups the Carina Cultural Group and the Karafouna Dancers; two NGOs the Waitukubuli Development Agency (WKDA) and the Kalinago Heritage Development Agency.

The stakeholders explained that most of the groups were reasonably active except for instances where lack of resources to implement activities led to inactivity, and in recent times the impact of the need for social distancing brought on by COVID 19. They also pointed to lack of continuity in the leadership of the Kalinago Council as a factor which negatively impacted on sustainability of the Hamlet Development Committees which are arms of the Council. The Sinekou Hamlet Development Committee was cited as the most active.

The existence of the following two NGOs was also confirmed:

- **Kipe Quati Inc.:** funded by the Robinson Trust with the objective of supporting training in journalism for the Kalinago people. Directors are Senator Annette Sanford, Paul Crask and Claudius Sanford
- **The Kalinago Institute for Global Resilience and Regeneration (KIGGR)** with the dual objective of i) promoting the use of resilient traditional species and agro-forestry, and ii) providing a source of additional income to committees through eco-tourism. Directors are Patrick Hill a hotel owner, Hon. Cozier Frederick the Parliamentary Representative for the Salybia constituency and Claudius Sanford, an Economist.

Development Planning Capacity

A stakeholder, Mr Joel Paris, expressed the view that the human resource capacity to conduct development planning and implementation existed within the Kalinago people, but the necessary framework for doing so did not exist and needed to be addressed. In this regard, Irvine Auguste, former Kalinago Chief, recommended that the Government of Dominica or the World Bank approach “like minded” indigenous groups globally to provide guidance and technical support to Dominica for putting in place the requisite framework.

Legislative Framework

Stakeholders confirmed that the ILO Convention 169 has not been enacted into national law in Dominica.

The issue of land ownership in the Kalinago Territory by non-indigenous people was discussed. Attorney Pearle Williams observed that she had often heard it expressed that the Kalinago did not have land

issues because land is communally owned; but that in fact there was the issue of Kalinago land being owned by non-Kalinago persons.

Patrick Louis Hill, who appeared to be informed on the history of the matter, provided specifics on ownership of the land. He noted that the established owner had bequeathed the land to his heirs, but that the land was being occupied by Kalinago people. He also indicated that the matter had been ruled on by the Court, which established legal ownership in favour of the “non-indigenous” owners. He suggested that any resolution would have to be a political one. He noted in this regard that the title holders had agreed in principle to giving up the land in exchange for crown lands.

Attorney Joel Paris expressed the view that the Project presents the best opportunity for the Kalinago people to seek to secure title to the entire Territory. It was noted that as part of this resolution a certificate of title should be issued in the name of the Kalinago Territory for the 3, 700 acres of land demarcated as the Kalinago Territory.

Gender Based Violence

A stakeholder expressed the view that the incidence of Gender Based Violence during project implementation is likely to be minimal.

Attendance Rate

The following table shows that out of the 23 invitees, 11 attended giving a participation rate of roughly 48%.

Table 1: List of Stakeholder/Attendance Rate

<u>Invitee Name</u>	<u>Address</u>	<u>Position</u>	<u>Attended</u>
Alexander Burton	Crayfish River	Councillor	Yes
Alexis Valmond	Crayfish River		Yes
Anique Valmond	St Cyr		Yes
Irvine Auguiste	Touna Village	Former Kalinago Chief/Operator of Community Home Stay Tourism Company	Yes
Kent Auguiste	Bataka		Yes
Senator Annette Sanford		Senator	Yes
Louis Patrick Hill		Hotel Owner	Yes
Joel Paris		Attorney	Yes
Pearle Williams		Attorney	Yes
Florence Gage		District Development Officer (DDO)	Yes
Prosper Paris		Ministry of Kalinago Affairs	Yes
Principal	Sinekou	Sinekou Gov. School	No
Garnet Joseph	Cray Fish River	Former Kalinago Chief	Yes
Lisa Eugene	St Cyr.		No
Natasha Green	Salybia		No
Kelly Graneau	Touna Village		No
Principal	Salybia	Salybia Primary School	No
Hon. Cozier Frederick		Parliamentary Representative	No
Chief Lorenzo Frederick		Kalinago Chief	No
Gweneth Frederick		Manager Kalinago Barana Aute	No
Donaldson Frederick		Ministry of Kalinago Affairs	No
Dr Charles Corbette		Ambassador	No
Jaqueliine Andre		Forest Officer	No
Kirk Brown		Safeguards Specialist IST	Yes
Mike Mc. Intyre		PIU Environment Specialist	Yes

Ronald Charles		PIU Forest Officer	Yes
Dr Sylvia Charles		Social Safeguards Consultant	Yes
Lucilla Lewis		Social Safeguards Consultant's Associate	Yes

October 2021

The following Power Point Presentations are attached in separate documents:

Annex 6

Community Consultation: Portsmouth, West Coast and Northern Villages
Leveraging Eco-Tourism for Biodiversity Protection Project
22 September 2021

Annex 7

Guide to Discussions
Public Consultations for Communities of the West Coast Road, Portsmouth and Villages
from TanTan to Cottage
September 22 2021

Annex 8

Draft Gender Assessment
Leveraging Eco-Tourism for Biodiversity Protection Project
September 22 2021

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