
COMMONWEALTH OF DOMINICA

***MINISTRY OF BLUE AND GREEN ECONOMY,
AGRICULTURE AND NATIONAL FOOD
SECURITY***

***LEVERAGING ECO-TOURISM FOR
BIODIVERSITY PROTECTION PROJECT
(P170846)***

***ENVIRONMENTAL AND SOCIAL
MANAGEMENT FRAMEWORK
(ESMF)***

**DRAFT v 2
June 21, 2021**

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ABBREVIATIONS AND ACRONYMS

CBO	Community Based Organizations
COVID 19	Coronavirus
CPA	Communal Property Associations
CFP	Chance Finds Procedures
DMO	Destination Management Organization
DOWASCO	Dominica Water and Sewerage Company Limited
DSWMC	Dominica Solid Waste Management Corporation
EALCRP	Emergency Agricultural Livelihood and Climate Resilient Projectn Central Bank
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
GA	Gender Assessment
GC	Grievance Committee
GEF	Global Environment Facility
GRM	Grievance Redress Mechanism
IPLC	Indigenous Peoples and Local Communities
IPPF	Indigenous Peoples Planning Framework
KBA	Key Biological Areas
LEToBP	Leveraging Eco-Tourism for Biodiversity Protection
LMP	Labor Management Procedures
OHSP	Occupational Health and Safety Plan
PA	Protected Areas
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
RPS	Regional Partnership Strategy
SEP	Stakeholder Engagement Plan
SMMES	Small Medium and Micro-Sized Enterprises
TMP	Traffic Management Plan
WB	World Bank
WBG	World Bank Group
WNT	Waitukubuli National Trail

1. INTRODUCTION

The Leveraging Eco-Tourism for Biodiversity Protection Project (LEToBP or Project) aims to coordinate and improve the Government's intersectoral approach towards more effective planning and management of Protected Areas (PA) and forest ecosystems, and to support the Government of Dominica's efforts to protect country's biodiversity through collaborative models with local communities that will elevate Dominica as recognizable eco-tourism destination. There are also potential negative consequences which may occur as a result and for which measures should be put in place to mitigate these negative impacts. To reduce or minimize these negative impacts, this Environmental and Social Management Framework (ESMF) was developed in compliance with the World Bank's Environmental and Social Standards (the ESSs) and the laws of the Government of Dominica commitment to address those project-related environmental and social negative outcomes which will affect the environment, communities and individuals, and also identify positive outcome opportunities for environmental and social risk management.

The purpose of the ESMF is to guide in screening of proposed investments, identify specific environmental and social risks and impacts associated with such investments, establish mitigation measures and how to operationalize, including specific ESMF instruments, principles, organizational arrangements, and design criteria to be applied to meet the needs of the people who may be affected by the various investments under the Project. The ESMF, therefore, is prepared to guide and govern the Project investments that are selected for financing and sets out the elements that will be common to all Project investments that will entail mitigation measures.

1.1 Objectives of the ESMF

The ESMF has the following as some of the specific objectives:

- To establish clear procedures and methodologies for the environmental and social planning, consultations, screening, review, approval/clearance, disclosure and implementation of Project investments to be financed under the Project;
- To propose broad streamlined procedures for the environmental and social assessment process and subsequent supervision of investments.
- To define a typology of investments under the Project which might require an environmental assessment (ESIA, ESMP) by location, size of project and other site-specific criteria.
- To develop guidelines for preparation of the operation and maintenance plans by communities and local government for new investments considering environmental and social considerations and mitigation measures identified during micro-project evaluation.

The ESMF focal point for project activities is the Project Implementation Unit (PIU) and at the country level the line Ministry or Department will be responsible for its coordination and implementation. This draft ESMF will be shared with the Project stakeholders for public consultation to gather their feedback and input, and it will be then revised to reflect such feedback and the final version of the ESMF will be publicly disclosed in the Project website. This ESMF was prepared based on the best available information and it will be updated to reflect adaptive risk management strategies, including when more information becomes available. When further information becomes available, such as detailed design and further information on

exact location, size, scope and methodology of the proposed activities and works under the Project, an ESIA and/or ESMP will be prepared in line with this ESMF.

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2. PROJECT DESCRIPTION

2.1 Project Background

The Waitukubuli National Trail (WNT) and Dominica's three national parks are a cornerstone for Dominica's eco-tourism potential, which needs further expansion. The WNT is the first Caribbean long-distance hiking trail and is in major need of management strengthening to attract more visitors. The trail spans 184 km, following generally north to south the ridgeline of the two major mountains of the island, each of which anchor national parks. The trail crosses all the major ecosystems of Dominica, provides unmatched opportunities for observing the country's biodiversity. The Waitukubuli National Trail (WNT) also comes in close proximity to waterfalls, hot springs, wildlife viewing opportunities and other natural attractions. It crosses the Kalinago Territory home to the indigenous Kalinago (Carib) people. Some 100-130 thousand international visitors visit the WNT annually and contribute to a wide variety of tourism-based enterprises ranging from hotels and guest houses to restaurants and guide services. The three national parks are the Morne Trois Pitons National Park in the south, the Morne Diablotin National Park in the northern mountain range and the Cabrits National Park in the north near the town of Portsmouth (see Figure 1). The national parks and trail network are managed by the Forestry Division of the Ministry of Environment Climate Resilience, Disaster Management and Urban Renewal, in cooperation with the Ministry of Tourism and Culture, to the constrained extent that current levels of public budget permit. Services include trash removal, trail clearance, emergency evacuations and first aid, licensing of guides, promotion and management of access, but these have been severely constrained by lack of funds, staff and capacity.

Policy and programmatic connections between biodiversity and tourism planning and management are weak and undeveloped. Despite the labelling of Dominica as the "Nature Island" there are few ways in which biodiversity and natural resource management are systematically linked. In particular, budgetary provisions for parks and the WNT are entirely divorced from the revenues realized by these assets and from the realistic costs of sustainable long-term management and protection. Of greater hazard are weaknesses in implementation of standards provisions intended to ensure adequate protection of environmental and cultural resources from adverse impacts from tourism development investments. There is a need for measures to enhance local community (especially *Kalinago*) benefit from, and support for PA and WNT management and protection via generation of tangible benefits from linked enterprises and investments. There are promising arrangements for inter-sector collaboration between environment, tourism and agriculture agencies, especially with regard to the WNT. These would be strengthened under the proposed project.

The goal of this project is 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. It is an opportune time to support Dominica in leveraging its planned tourism investments to reap additional local economic returns through sustainable eco-tourism use of its protected areas. The eco-tourism planning for the PAs in Dominica needs to identify potential sites of interest and create short value-chains benefiting the local communities. A more satisfying visitor experience can be generated through an expanded activities portfolio as well as better management of trail services. Providing environmentally sound access through strategically placed view-points and trails will also contain pressures on habitats. The safety of the trail system needs to be ensured along dangerous stretches such as

along steep cliffs, shorelines or hillsides. The national park management planning process should also fully integrate stakeholder engagement to benefit local and indigenous communities.

Figure 1: Waitukubuli National Trail (WNT)



World Bank involvement in Dominica is guided by the Regional Partnership Strategy for the Organization of the Eastern Caribbean States (RPS), the objectives of which is to contribute to laying the foundations for sustainable inclusive growth through three areas of engagement: (i) competitiveness, (ii) public sector modernization, and (iii) resilience. Under the RPS, the WBG will

focus on laying the foundations for increased private participation in the economy by creating a more effective investment climate and promoting the competitiveness of industries with high potential, including tourism. Over the long run, this is expected to contribute to higher investments, private sector activity, and ultimately growth and employment, as well as to poverty reduction in rural areas where many smallholders live. The proposed project will align with these objectives by strengthening the competitiveness of the tourism sector in Dominica through an expanded nature-based activity portfolio. It will support eco-tourism and PA investments that simultaneously address livelihood diversification, indigenous peoples, and modernization of Dominica's forest agencies. The project's intent is also to contribute to the WBG's goal of fostering climate mitigation and adaptation by, first, strengthening forest planning and management, including land use, and thus contributing to mitigation, and second, by providing alternative livelihoods to communities affected by climate change such as subsistence agriculture and fishing to foster adaptation.

2.2 Project Description

The Leveraging Eco-Tourism for Biodiversity Protection Project (LEToBP or the Project) is funded by a Grant from the Global Environmental Facility (GEF) and is being implemented by the Government of Dominica, through its Ministry of Blue and Green Economy, Agriculture and National Food Security . The Dominican Leveraging EcoTourism for Biodiversity Protection (LEToBP) is a nationwide project being implemented under The Ministry of Environment, Rural Modernization and Kalinago Upliftment. The Project aims to coordinate and improve the Government's intersectoral approach towards more effective planning and management of Protected Areas (PA) and forest ecosystems, and to support the Government in its efforts to protect country's biodiversity through collaborative models with local communities that will elevate Dominica as recognizable eco-tourism destination. This will be achieved by improving the institutional framework for biodiversity planning and management, strengthening national and local capacities and resources for PA management end eco-tourism trails, as well increasing sustainable livelihood opportunities for indigenous communities.

The objective of the project is to improve management of Dominica's three (3) national parks (Morne Trois Pitons, Morne Diablotin and Cabrits), and the Waitukubuli trail. Specifically, the project includes analyses, coordination efforts and capacity building that will improve protection and management of three national parks and the Waitukubuli National Trail (WNT), and offer new livelihood opportunities for local people of the Kalinago territory and communities adjacent to the parks. Investments in on-the-ground activities to demarcate national parks boundaries and buffer-zones and improve sustainable ecotourism operations have been prioritized due to biodiversity significance and value of targeted areas, needs for strengthening governance and raising human capacities, and the involvement of local stakeholders in sustainable resource use and reviving traditional knowledge and skills. Targeted area of the project encompasses even 14,135 ha or 18,85% of the country's territory, as presented in the following Table 1. Coverage of targeted areas¹.

¹ <http://forestry.gov.dm/units/national-parks-section>

Table 1: Coverage of Targeted Areas

Targeted Area	Area in ha
Morne Trois Pitons National Park	6,875
Cabrits National Park (terrestrial)	110
Morne Diablotin National Park	3,450
Kalinago territory	3,700
Total	14,135

2.3 Project Components

The project consists of four (4) components each addressing key development and sustainability constraints for eco-tourism and biodiversity protection, and mutually supporting the overall Project Development Objective ‘To improve management of Dominica’s three national parks and the Waitukubuli National Trail (WNT)’. Of the four components, component three specifically seeks to improve the livelihoods of the Kalinago People. Initiatives in the other components will also redound to the benefit of the Kalinago people.

Component 1: Protected Area Planning (US\$846,900). Component 1 is intended to “enhance the national capacity and strengthen the institutional framework for managing natural resources for nature-based tourism growth”. (Project Paper) This component provides for technical support in revising management plans for the PAs and the WNT and for the demarcation of boundaries and a buffer zone for the Morne Diablotin National Park.

Sub-component 1.1. Strengthening the institutional framework for PA planning and management.

This sub-component aims “to strengthen the current national institutional framework and enhance the involvement of decision-makers and policy planners across key institutions on the value of PAs”. Included in this aspect of the Project is technical assistance in the revision of management plans for the three national parks and the WNT and demarcation of boundaries for the Morne Diablotin National Park.

Sub-component 1.2. Improving national and local capacities for PA monitoring and management

This sub-component is intended to strengthen capacities for biodiversity monitoring and protection at the national level. It will also provide limited equipment and supplies for monitoring, data collection and sampling, especially for the Forestry Division within MERMKU.

Component 2: Biodiversity and Sustainable Nature-based tourism Operations (US\$1,753,800).

This component focuses on improving tourism infrastructure that is in harmony with the natural environment, and which will improve 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 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).

Sub-component 2.1. Enhancing biodiversity knowledge and awareness, and visitors' access, safety and experience

This is intended to enhance infrastructure used in the access to and interpretation and presentation of Dominica's biodiversity, together with support services for visitor management. One of the key aspects is the proposed introduction of an e-ticketing system that could be linked to digital maps, information and guidance to deliver a 'one-stop-shop' for visitors to access the PAs and the WNT, thus upgrading the service to potential visitors to the PAs and the WNT. This innovation, together with the proposed revision in the fee structure, regular maintenance of infrastructure and focused promotion, is projected to generate a 30 per cent increase in revenue. This sub-component also provides for the construction of new or improvement of existing infrastructure (interpretation centres, gazebos, benches, shelters, viewing platforms, river crossings and handrails). In addition, it includes provision for clearance, realignment of trails, trail repairs, scientific, archaeological, anthropological and ecological displays; as well as user surveys.

Sub-component 2.2. Increasing capacities and resources for nature-based tourism trail management

This sub-component provides for capacity building in trail management for key stakeholders, namely the Forestry Division and the Kalinago community. It will also include the preparation of a Divisional Operational Manual with procedural guidelines for trail management.

Component 3: Sustainable Livelihoods (US\$747,854).

This component seeks to provide opportunities for improving sustainable livelihoods for the Kalinago community 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.

Sub-component 3.1. Enhancing opportunities for sustainable livelihoods

"The objective of this sub-component is to provide the development framework and investment support for sustainable land use and nature-based tourism operations and to enhance opportunities for livelihoods through empowering Kalinago women and youth in cooperative initiatives" (Project Paper). This sub-component is also intended to provide support for mapping, demarcation and preparation of participatory management plans for land use and watershed management for the Kalinago Territory. It will also provide for assistance to the Kalinago Council in planning for forest management. In addition, it seeks to empower Kalinago women through supporting opportunities for entrepreneurship, particularly among women and youth. Initiatives will include support for marketing agricultural products, for promoting gastronomy experiences, and production of craft plant material (larouma, cassava, calabash, mibi). Some 250 farmers and craft makers are expected to benefit from this programme.

Sub-component 3.2. Reviving traditional Kalinago knowledge

This sub-component is intended to increase the capacities in traditional knowledge and skills within the Kalinago community, particularly among the youth. It provides for training programmes in Farine/Toloman crop production, canoe building, basket making, culinary arts, and making of traditional Kalinago costumes. It will also assist in upgrading equipment for Farine/Toloman production and support the development of a traditional, model farm to be

located at the Salybia propagation centre. This component is intended to support the preservation of Kalinago heritage, mainly through knowledge transfer to the youth.

Component 4: Project Management (US\$167,428). The funding for this component is earmarked for administrative support, financial management, monitoring and evaluation and audit costs throughout the Project's life.

2.4 Project Beneficiaries

The project will have positive social and environmental benefits at local, national, regional and global levels. At the local level, direct project beneficiaries include the Kalinago indigenous peoples, local communities and their members in targeted landscapes, and individual entrepreneurs, small, medium and micro-sized enterprises (SMMEs), community-based organizations (CBOs), such as co-operatives, communal property associations (CPAs), and community trusts. Benefits are expected to include improved access to skills training for business development, finance and markets, improved local governance, and subsequently more profitable community or individually-owned businesses and increased household income. Women bear the heavy burden of ensuring the livelihood sustainability of rural households and, as such, they will be specifically targeted as important Project beneficiaries, as set out below. Moreover, restrictions on their participation in public consultations and decision-making spaces, and customary laws all play against women empowerment within the communities in country. As such, the Project envisages targetting women as beneficiaries of the Project by empowering women (including, in particular, Kalinago women) by (a) ensuring their active participation in project consultation and decision mechanisms at the community level; (b); increasing their integration into and access to value chains; (c) promoting greater participation of women in credit and savings schemes and all forms of capacity building; and (d) providing access to training opportunities and benefits to increase their capacity on leadership conservation schemes. The Project will also define measures to ensure that women, youth and other vulnerable groups, such as the Kalinago or disabled people, are adequately represented and participate in both project activities and decision-making processes. Private sector businesses that enter into partnerships with entrepreneurs in local communities will benefit from increased sustainability in their productive value chains. At the national level, the overall economy is expected to benefit from eco-tourism driven economic growth, increase in technical skills, new business opportunities, and enhanced resilience to climate change in rural areas, and further inclusion of historically-disadvantaged segments of the population. The project will also benefit the regional and global community through the protection of globally-significant biodiversity and natural habitats.

3. LEGAL AND INSTITUTIONAL FRAMEWORK

The Project Implementation Unit (PIU), which shall be housed within the Ministry of Blue and Green Economy, Agriculture and National Food Security will be the implementing entity will have oversight for the LEToBP. Project activities will be implemented in line with the relevant national policies and regulations for governments of the Commonwealth of Dominica, as well as the World Bank’s ESSs.

3.1 National Regulation and Environmental and Social Standards

The existing national legislation for Dominica has been reviewed to identify the provisions regarding environmental and social standards for the Project. The main pieces of existing legislation relevant to the project are highlighted below:

Table 1. National Law and Relevant World Bank Standards

National Law	Relavance to Project Activities	Relavant World Bank Standards	Gap analysis between National Laws and World Bank ESS
Solid Waste Management Act 2002	The project seeks to dispose solid waste (construction debris) and sewage collection generated waste generated from the construction of viewing platforms etc.	ESS3: Resource Efficiency and Pollution Prevention and Management	ESS3 provides for the efficient consumption of energy, water and raw materials, as well as other resources. This is not included under the Waste Management Act.
Physical Planning Act (2002)	The project will involve minor civil works and it covers a large geographical area of high biodiversity. This Act provides for the orderly and progressive development in construction Ecotourism facilities. Conduct Public Disclosure and Stakeholder consultation during Project preparation and implementation.	ESS1 Assessment and Management of Environmental and Social Risk and Impacts ESS10. Stakeholder Engagement and Information Disclosure	ESS1 provides for the assessment , management and monitoring of environmental and social risks and impacts.The physical planning act does not include social risk nor monitoring and management, it primarily relates to building permit. ESS 10 calls for early consultation and engagement of stakeholders and disclosure of information. This aspect is not covered under the physical planning act.
Kalinago Territory Act (2015)	The project involves the restoration / rehabilitation of sections of the Waitukubuli National Trail (WNT), which passes through the Kalinago	ESS 7: Indigenous Peoples	ESS7 contributes to poverty reduction and sustainable development of indegenous People. Ensuring that they are equally represented. However, the

	Territory, as well as it aims at preserving traditional knowledge of the Kalinago community. Therefore the Project should pay special recognition and attention to the feedback and concerns of indigenous people.		Kalinago Territory Act specifically relates to Dominica and cover among other policies the use of land within the Territory.
Water and Sewerage (Catchment Area) Regulations (1995)	Most of the trail repair works will be conducted in the catchment area, where disposing of waste is strickly prohibited.	ESS3: Resource Efficiency and Pollution Prevention and Management ESS 4: Community Health and Safety	ESS4 provides for the health, safety, and security risks and impacts on affected communities. This is not covered in the water and sewage act which primarily deals with protection of water catchment areas.
Forestry Act (1959), Forest and Wildlife Act (1976), National Parks and Protected Areas Act	Provides for the protection of Dominica’s biodiversity, National Parks and protected areas system	ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	No Gaps, botht the national law and ESS speaks to conservation and protection of natural resources.
Employment Safety Act (No. 3 of 1982)	Provision of safety of workers working on the WNT and PA. Provision of training and support to Park Wardens and Foresters involved in law enforcement specifically relating to the illegal removal of forest product i.e wildlife and timber. The activities of these personnel will require close oversight to avoid abuses of power. The project is being implemented in a region with a high risk of extreme weather events, which requires attention being given to emergency	ESS2: Labor and Working Conditions ESS 4: Community Health and Safety	ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and to promote safe and healthy working environment , which covers more areas than the Employment Safety Act.

	preparedness and response activities.		
Environmental Health Services Act (No. 8 of 1997)	Provides for the regulation of the discharge of waste and pollutants in public areas, including the WNT and Protected Areas	ESS 4: Community Health and Safety ESS3: Resource Efficiency and Pollution Prevention and Management	No Gaps, as both National Law and ESS 4 promotes health and safety of communities.
Protection Against Domestic Violence Act 2001 Sexual Offences Act 1998	The project involves the engagement of workers and must therefore safeguard against any labor related risk to include discrimination, workplace injuries, child labor, Sexual Exploitation and Abuse/Sexual Harrassment and the transmission of COVID 19.	ESS2: Labor and Working Conditions ESS 4: Community Health and Safety	ESS2 does not take into consideration any of the issues outline in national law to include the protection against domestic violence, sexual exploitation/abuse and sexual harrassment.
Ministry of Health, Wellness and New Health Investment	Responsible for all Covid 19 protocols to be followed to curtail the spread of the virus	ESS 4: Community Health and Safety	No Gaps, though not a law this Ministry encompasses all aspects of environmental and public health issues
Land Acquisition Act (1946, amended in 1986)	Outlines procedures for using private lands for the development of the WNT or PA. Though there are no involuntary resettlement there may be restriction on land use in the bufferzones of the PA and on farm lands where the trail passes.	ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	ESS 5 covers socioeconomic aspect to include restrictions on land use which can have adverse impacts on communities and persons, the physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood),
Pesticides Control Act (Cap. 40:10)	Provides for the control of the importation, sale, storage and the use of pesticides. The Project activity does not allow for	ESS3: Resource Efficiency and Pollution Prevention and Management	ESS3 provides for the efficient consumption of energy, water and raw materials, as well as other resources. This is not

	<p>the use of pesticide, However, there are no restriction on the use of pesticide on farms where the trail traverses nor on farms within the buffer zone area bordering the PA.</p>		<p>included under the pesticides control act.</p>
<p><u>Public Procurement and Contract Administration 2012</u></p>	<p>An act to provide for the general requirements in relation to public procurement, for exempt procurement, for the establishment of procurement authorities, for the procurement procedures and the award of contract, for the administration of contracts, for the suspension and debarment of suppliers and contractors, for the assessment of procurement, for the review process, and to provide for connected and incidental matters.</p>	<p>ESS 10: Stakeholder Engagement and Information Disclosure</p>	<p>ESS 10 establish a systematic approach to stakeholder engagement that helps identify stakeholders and build and maintain a constructive relationship with them throughout the life of the project ESS 10 assess stakeholder interest, engagement and allow for their views to be considered during project design. ESS 10 ensures that environmental and social risks and impacts are understood and disclosed in a timely manner. The National Law is limite to procurement procedures and adminstering and management of contracts awarded. ESS 10 will bridge the gap to include consultation and information disclosure of all aspects of the project to stakeholders.</p>
<p>Labour Contracts Act 89:04.26</p>	<p>Persons who employs another shall, not later than fourteen days from the date on which the employment commences, prepare a labor contract in writing correctly describing the terms and conditions of</p>	<p>ESS 2: Labour and Working Conditions</p>	<p>ESS 2 Promote safety and health at work, fair treatment, nondiscrimination and equal opportunity for all workers (vulnerable and marginalized) ESS 2 Prevent the use of all forms of forced labor and child labor and allows for freedom of</p>

	employment that have been agreed upon by the employer and the employee.		association collective bargaining and a means to raise workplace concerns. However, the National Law outlines contract engagements pertaining hours work, leave, rate of pay and duties to be performed etc. ESS 2 will bridge gaps not in the National Law.
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- **Physical Planning Act (2002)**

The Physical Planning Act (2002) provides inter alia for the orderly and progressive development of land and for the grant of permissions to develop land and for other powers of control over the use of land. This Act details the application and approval process which is executed through the Physical Planning Division of the Physical Planning and Development Authority. The Act states that ‘No person shall carry out any development of land except under and in accordance with the terms of a development permission granted in that behalf prior to the commencement of such development. It makes provision for the Authority to consult with local authorities where such consultation is desirable in the interests of good planning. Further, ‘Unless the Authority otherwise determines, environmental impact assessment shall be required in respect of any application for development permission to which the Second Schedule.

- **Solid Waste Management Act 2002**

The Dominica Solid Waste Management Corporation (DSWMC) is designated by the 2002 Solid Waste Management Act to operate waste management facilities and to develop waste diversion strategies. The Act authorizes the Corporation to contract and develop guidelines and procedures for contractors that conduct waste operation in the state. The Act is applicable given the proposed rehabilitation and retrofitting of existing trails and buildings which will result in the removal of waste (i.e. construction debris, etc) to the DSWMC approved disposal site, Fond Cole landfill.

- **Kalinago Territory Act (2015)**

The Carib Reserve Act of 1978, amended by an act of parliament in 2015, provides for the establishment of a body corporate for the administration of the Reserve and for matters connected herewith.² The amendment changed the name Carib to Kalinago, and since then any reference to the indigenous people of Dominica makes use of the name Kalinago. The Act gives the Kalinago Council³ the authority and responsibility for the management of the Kalinago Territory and variously describes the establishment of the office of the Kalinago Chief, the Constitution, and powers of the Kalinago Council. Specifically, it gives various powers to the Kalinago Chief and the Kalinago Council and outlines responsibilities of the Minister responsible for the Council. Furthermore, it outlines the means of conducting elections for Council Members and the Chief. It also indicates how funds are to be used on behalf of the Territory. The Act gives

² Carib Act of 1978 <http://www.dominica.gov.dm/laws/chapters/chap25-90.pdf>

³ The indigenous people of Dominica are now referred to as Kalinago, following an Act of Parliament in 2015 (See page 5 of this document)

the Kalinago Council powers to institute various bylaws pertinent to the management of the community. The Act is applicable given the proposed rehabilitation and retrofitting of existing trails and buildings in the Kalinago Territory.

- **Land Acquisition Act (1946, amended in 1986)**

The Land Acquisition Act, Chapter 53:02 deals with the acquisition of land by the state, and outlines procedures in acquiring private land for a public purpose. No lands are to be acquired under this Project as existing trails are located on Government of Dominica lands.

- **Water and Sewerage Act (1989)**

The water management authority is vested in DOWASCO which includes among its functions water conservation and the preservation and protection of catchment areas. Responsibility for catchment areas is shared with the Forestry and Wildlife Division. The Act is applicable given the proposed rehabilitation and retrofitting of existing trails and buildings.

- **Water and Sewerage (Catchment Area) Regulations (1995)**

These rules were made under section 5 of the Act. The rules prohibit certain acts in water catchment areas including washing equipment used for applying pesticides and containers which contain or have contained pesticides in any river or stream in the area. Of note is the requirement that there must be no direct discharge of household or industrial waste, sewerage or sludge into any stream or river.

- **Forestry Act (1959), Forest and Wildlife Act (1976), National Parks and Protected Areas Act**

The Act provides for the protection of Dominica's biodiversity, National Parks and protected areas system. The act authorizes the Minister to designate Government lands as protected areas for the preservation of natural features and for the conservation of historic sites and landmarks.

- **Pesticides Control Act (Cap. 40:10)**

The Pesticides Control Act provides for the control of the importation, sale, storage and the use of pesticides. It creates a Pesticides Control Board to advise the minister and to carry out provisions of the Act and its Regulations. It gives power of entry to an inspector. The minister may make regulations to effect the provisions of the act. Subsidiary legislation includes the Pesticides Control (Labeling of Pesticides) Regulations and the Pesticides Control (Registration and Licensing) Regulations.

- **Ministry of Health, Wellness and New Health Investment**

The Ministry of Health, Wellness and New Health Investment is the arm of the Government responsible for the advocacy and compliance of COVID 19 protocols.

The outbreak and spread of COVID-19, people have been advised, or may be mandated by national or local law, to exercise social distancing, and specifically to avoid public gatherings to prevent and reduce the risk of the virus transmission. Countries have taken various restrictive measures, some imposing strict restrictions on public gatherings, meetings and people's movement, and others advising against public group events. At the same time, the general public has become increasingly aware and concerned about the risks of transmission, particularly through social interactions at large gatherings. The major risk of the COVID-19 is its mode of

transmission and that an increase in physical contact as well as shared social spaces, enables the spread of the coronavirus. It is important that the established COVID protocols of the World Health Organization (WHO) and the Ministry of Health, Wellness and New Health Investment be applied to project activities, PIU personnel, beneficiaries and contractors.

EALCRP PIU personnel must utilize physical distancing, practice personal hygiene and wear the designated personal protective equipment (PPE) to minimize the spread of the virus and safeguard themselves and project beneficiaries. COVID 19 measures outlined in the Stakeholder Engagement Plan will be applied to all consultations and stakeholder engagements. Contractors will be required to prepare and submit a detailed COVID plan to EALCRP PIU demonstrating their ability to safeguard health and safety of workers/employees while on site. The COVID Plan should include, but not limited to:

- Site access control and traffic management
- Checking of body temperature, physical distancing, personal hygiene
- Disinfection of premises, offices, workspaces and equipment
- Train all staff in the signs and symptoms of COVID-19
- Communicating health and safety matters relating to COVID-19, including wearing of personal protective equipment (PPE) - Wear gloves, glasses and masks, etc.
- COVID incident notification

- **Employment Safety Act (No. 3 of 1982)**

The Employment Safety Act (No. 3 of 1982) provides for reorganizing the system under which safety and health at work is safeguarded and to extend it to cover everyone at work; to provide for the establishment of consultative and advisory committees; to provide for the appointment of safety officers and for purposes connected with those matters.

- **Environmental Health Services Act (No. 8 of 1997)**

Provides for the regulation of the discharge of waste and pollutants in public areas. Allows the Health Minister to make regulations concerning, inter alia, the hygiene of workplaces and exposure to substances in workplaces.

- **Protection Against Domestic Violence Act 2001**

The law governing domestic violence in Dominica is the Protection against Domestic Violence Act 2001. This Act creates a wide range of speedy and effective remedies which are aimed at reducing the incidences of domestic violence. A magistrate or judge can grant:

- a protection order that prohibits abuse and molestation, excludes the abusive person from the home or workplace etc.
- an occupation order which gives a right to remain in the household residence
- a tenancy order which vests the tenancy in the person who applied for the order
- Other orders relating to counselling, the use of furniture and household effects, payment of rent, mortgage, utilities etc.

- **Sexual Offences Act 1998**

The Sexual Offences Act 1998 governs sexual offences in Dominica. The Act recognizes a wide range of offences and has provisions geared at offering greater protection to children and

persons with mental disorders. There are also special provisions governing court proceedings. Not all offences under this Act involve what would be considered gender-based violence, for example prostitution. Some acts amount to offences even if they are consensual (example buggery).

Offences recognized under the Sexual Offences Act 1998 include:

- Rape
- Buggery

Indecency between a woman and a girl

- Gross indecency
- Indecent assault
- Unlawful sexual connection

Incest

- Sex trafficking/procurement
- Sexual offences in relation to children
- Sexual offences in relation to persons with mental impairment

- **Public Procurement and Contract Administration 2012**

An act to provide for the general requirements in relation to public procurement, for exempt procurement, for the establishment of procurement authorities, for the procurement procedures and the award of contract, for the administration of contracts, for the suspension and debarment of suppliers and contractors, for the assessment of procurement, for the review process, and to provide for connected and incidental matters.

- **The Labor Contracts Act Chpt 89:04.26**

Any person who employs another shall, not later than fourteen days from the date on which the employment commences, prepare a labor contract in writing correctly describing the terms and conditions of employment that have been agreed upon by the employer and the employee. Where, pursuant to section 3, a labor contract has been prepared by an employer respecting the employment of an employee: (a) a copy of the labor contract shall be delivered forthwith by the employer to the employee for his inspection; (b) the employer and employee shall sign the labor contract including any amendments agreed upon within three days of the date on which it was delivered to the employee; and (c) the employer shall give the employee a signed copy of the labor contract.

A labor contract between an employer and an employee shall set out:

- (a) the names of the employee and the employer;
- (b) the date on which the employment of the employee began or will begin;
- (c) a description of the duties of the employee;
- (d) the rate of pay that the employee is entitled to receive in respect of his employment, or the method to be used for calculating the pay of the employee;

- (e) the intervals at which the employee will receive his pay, being intervals not exceeding one months in duration;
- (f) the period of time during which the employee will be on probation;
- (g) the normal hours of work of the employee;
- (h) the rate of pay that the employee is entitled to receive for hours worked by him in excess of or outside his normal working hours;
- (i) the annual leave to which the employee is entitled and the pay that he is entitled to receive during the period of his annual leave;
- (j) the sick leave to which the employee is entitled and the pay that he is entitled to receive during any period of sickness;
- (k) the length of notice that the employer and employee must give in order to terminate the labor contract; and
- (l) any other term or condition of employment that has been agreed upon

3.2 World Bank Environmental and Social Framework

The World Bank Environmental and Social Framework (ESF) protects people and the environment from potential adverse impacts that could arise from Bank-financed projects and promotes sustainable development. This framework provides broad coverage, including important advances on transparency, non-discrimination, social inclusion, public participation and accountability. The Environmental and Social Standards set out the requirements for the Government of Dominica relating to the identification and assessment of environmental and social risks and impacts associated with this Project .

The relevant Environmental and Social Standards (ESSs) establish the standards that the PIU and the project will meet throughout project implementation. A summary of the key objectives of these ESSs and their relevance to the project are provided in Table 2. ESS1–10 set out the obligations of the Project in identifying and addressing environmental and social risks and impacts that may require particular attention. These Standards establish objectives and requirements to avoid, minimize, reduce and mitigate risks and impacts, and where significant residual impacts remain, to compensate for or offset such impacts.

Table 2: Summary of Environmental and Social Standards relevant to the Project.

DRAFT

World Bank ESS Standard	Relevance to the Project
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	The standard is relevant to the project. The project will involve minor civil works and it covers a large geographical area of high biodiversity. Restrictions on access or use can occur, resulting in loss of access to land and, potentially, some livelihood insecurity for the populations. Environmental impacts are likely to be minor and reversible.
ESS2: Labor and Working Conditions	The standard is relevant to the project. The project involves: direct workers, employed or engaged directly by the EALCRP; contracted and community workers, employed or engaged. Potential labor risks include discrimination, workplace injuries, child labor, SEA/SH and the transmission of COVID 19.
ESS3: Resource Efficiency and Pollution Prevention and Management	The standard is relevant to the project. The project seeks to mitigate solid waste (construction debris), sewage collection and treatment .
ESS4: Community Health and Safety	The standard is relevant to the project. Provision of training and support to Park Wardens and Foresters involved in law enforcement. The activities of these personnel will require close oversight to avoid abuses of power and this ESMF will detail how security personnel will conduct themselves. Health risks to workers and the public, which must be avoided or minimized. Finally, the project is being implement in a region with a high risk of extreme weather events, which requires attention being given to emergency preparedness and response activities.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	The standard is relevant to the project as there are lands owned mainly by farmers that are being used as part of the WNT and PA. Farmers and owners of those lands would have restricted access. However, there will be no Involuntary Resettlement of Landowners along the WNT.
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	The standard is relevant to the project. The project is based on the protection biodiversity, and the management and monitoring of Protected Areas.
ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	The standard is relevant to the project. The project involves the restoration / rehabilitation of sections of the Waitukubuli National Trail (WNT), which passes through the Kalinago Territory, as well as it aims at preserving traditional knowledge of the Kalinago community. Therefore the Project should pay special recognition and attention to the feedback and concerns of indigenous people.
ESS8: Cultural Heritage	The standard is relevant to the project. Although the project does not likely envisage any impacts on physical, cultural, and/or archaeological sites, the standard is considered relevant since some of the minor civil works may require excavation below ground. The project will rely on a chance finds procedure contained as a precaution in the project's ESMPs and as part of construction contracts to be awarded under the project.
ESS9: Financial Intermediaries (FIs)	The standard is NOT relevant to the project, as there are no FIs involved in the project.

<p>ESS10: Stakeholder Engagement and Information Disclosure</p>	<p>The standard is relevant to the project. The project is required to disclose the environmental and social risk management documents (Environmental and Social Commitment Plan (ESCP), Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP), Labour Management Procedures (LMP), Gender Assessment (GA), Indigenous Peoples Planning Framework (IPPF) and/or Indigenous Peoples Plan (IPP), Process Framework and consult with relevant Project stakeholders on these aforementioned draft documents and the Project as a whole, throughout Project preparation and implementation. COVID 19 protocols will be utilized where necessary for consultations and stakeholder engagement.</p>
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3.3 World Bank and Global Environmentl Facility funded Projects in Dominica

The project builds on the Country Forest Note, two World Bank (WB) investments, two Global Environment Facility (GEF) projects and regional GEF engagements, providing a strong increment for the GEF engagement. The Country Forest Note provides the analytics and assessment of the legislative framework and processes and budgeting. The proposed project will further build on existing GEF engagements and will optimize the impact of two WB investment operations. First, the GEF engagement in Dominica so far has concentrated on one of the national parks and as such this proposed work would build on and expand the activities, while focusing them on eco-tourism. The GEF-6 UNEP project (9978) “Strengthening Resilience of Agricultural Lands and Forests in Dominica in the Aftermath of Hurricane Maria” works on land degradation around Morne Trois Piton National Park (MTPNP). The GEF-5 UNDP project “Supporting Sustainable Ecosystem by strengthening the Effectiveness of Dominica’s Protected Area System” is developing a site-specific management plan for MTPNP, ensuring the legal establishment of a buffer zone for MTPNP and creating community atlases for local communities in and around the buffer zone. Furthermore, the proposed activities will leverage two ongoing WB investment operations which advance protected area management and biodiversity protection – the Emergency Agriculture Project (P166328) and the Dominica Vulnerability Reduction Project (P166540). This activity is parallel co-financing with the Emergency Agriculture Project. This project is making investments in the protected areas and their management such as trail rehabilitation, fauna survey, infrastructure and livelihoods. The second WB investment project is the Dominica Vulnerability Reduction Project which is investing in a flora survey and park infrastructure. Both projects are addressing currently urgent needs for the PAs such as data collection, propagation centers and emergency trail reconstruction but need programming for further investments, which this proposed project will supply.

Hurricane Maria hit the island of Dominica on September 18, 2017, with catastrophic effects. Hurricane Maria made landfall as a Category 5 storm (Saffir-Simpson scale), with winds exceeding 170 miles per hour (mph). Hurricane Maria was one of the most rapidly intensifying and destructive hurricanes.

4. ENVIRONMENTAL AND SOCIAL BASELINE⁴

4.1 Physical Environment

4.1.1 Commonwealth of Dominica

The Commonwealth of Dominica is located at 15 degrees North and 61 degrees west, occupying a central position in the eastern Caribbean archipelago. The country is bordered by the French territories of Guadeloupe and Martinique to the north and south respectively. The island is approximately 750.6 square kilometers and is the largest in the Windward and Leeward groups of the Eastern Caribbean (Figure 2).

Figure 2: Location Map and Geographical Features of Dominica



The Commonwealth of Dominica is a small upper-middle-income country in the Caribbean Sea, with a population of 73,543, predominantly dependent on agriculture and tourism. With annual gross domestic product (GDP) of US\$581.48 million, Dominica's economy depends predominantly on agriculture and tourism. Poverty remains a pervasive development issue, with a poverty headcount of 28.8 percent at the time of the last Country Poverty Assessment (CPA) conducted in 2009. Dominica is affected by fiscal sustainability challenges, with public debt levels as high as over 82.7 percent of GDP, because of the country's exposure to natural disasters and external shocks. Climate change has significantly affected the country's economic and fiscal stability as well as the population's well-being. Average annual losses from weather-related events between 1996 and 2015 are estimated at 7.9 percent of GDP, making Dominica the second most affected country globally in terms of average GDP loss. Fiscal losses arising from these events and the ongoing challenges of climate change, has been devastating and threatens to set back development gains and economic growth.

4.1.2 Geology and Topography

Dominica is part of the wider Antillean Arc of islands that are geologically young. There are nine active volcanoes in Dominica, which give the island its rugged topography. A chain of mountains extends from the center to the south, creating ridges and steep river valleys. Gently sloping lands

⁴ Source: Dominica National Report- Organisation of American States (OAS)

are restricted to narrow coastal strips along approximately ninety (90) miles of coastline. The rocks of Dominica are almost entirely of volcanic origin, other than recent alluvium along river valleys and reworked beach deposits along some coastlines. The oldest rocks pose unique challenges for slope stability because of their high clay content and easily erodible nature, which increase local landslide hazard level and therefore requires a bit more of soil stabilization. In order to solve the serious problems caused by unsuitable management to sustain volcanic soils, crop rotation, soil amelioration, precision agriculture and programmed fertilizer regimes must be encouraged.

4.1.3 Geo-hazards

Dominica's climatic and geophysical context give rise to many natural hazards: hurricanes, earthquakes, volcanic activity, drought, flooding, and landslides. The effects of these phenomena can be exacerbated by human activity such as deforestation, indiscriminate waste disposal, poor building practices, and unplanned settlements in environmentally sensitive areas. The project should aim at an integrated approach in all envisioned investments.

4.1.4 Hurricanes

The Island has experienced several damaging hurricanes and tropical storms, since formal monitoring began in the 1970s: Hurricane David (1979), Hurricane Luis (1995), Hurricane Dean (2007), tropical storm Erika (2015), and Hurricane Maria (2017). These events damaged buildings, agricultural outputs, and road infrastructure. During hurricanes, coastal zones are vulnerable to storm surge of 3-5 meters, causing flooding and soil erosion from violent sea waves. Dominica was an important producer and exporter of vegetables, tubers and fruits such as bananas. Therefore, the destruction caused by Maria has not only compromised the national economy and food security but also manifested its effects in other countries of the region that usually rely on importing food from Dominica.

Agricultural impacts include depletion of standing crops, agricultural stations, a 250-acre coconut plantation, agricultural equipment and machinery. In addition, the livestock subsector was affected with losses of small and larger animals as well as shelter facilities. During the passage of the storm, many fishing boats, gears and other equipment were lost and destroyed, negatively affecting the fisheries sector.

4.1.5 Slope Stability and Landslides

Most landslides and soil erosion events are triggered by heavy rainfall, even outside of hurricane season. The number and density of landslides generated island-wide can be linked to the magnitude of tropical storms/hurricanes and high intensity precipitation. An inventory of landslides post-Maria recorded a total of 9,960 landslides triggered by the hurricane. The total landslide area was 10.30 km², which amounts to 1.37 percent of the island. The landslide source area was 3.30km², and the remaining 7.0 km² was transportation and deposition. Quarrying is another activity that leaves the land barren and susceptible to soil movements.

Deforestation and soil type found in the area both of which provide proneness to ground movement and therefore it's always important to determine the soil type, it would give an indication of what type of foundation you would need to have to decrease the impact of soil movement. To reduce impacts on landslides the following may be applied as mitigation measures: (i) Public education- public education initiatives would increase the populace awareness of the hazard and what they can do to mitigate against it. Such initiatives would make

people better aware of the risks that they face, especially those that live in high risk areas; (ii) Build retaining walls in areas that are prone to landslides; (iii) Policies regarding the use of proper building codes when constructing structures should be enforced; (vi) Provide incentives and monetary help to special needs individuals so that they improve on their resilience abilities.

4.1.6 Soils, fertility and drainage

Landslides stripped the soil of productivity and sedimentation, and which resulted in siltation of rivers, and debris obstructed natural drainage and waterways. Dominica faces increased landslide hazards as these fresh scarps are more easily eroded and debris flows will likely be triggered by substantially lower rainfall thresholds than before the hurricane.

The workability of the soils, therefore, should be improved in terms of undertaking an emergency campaign for tidal surge soil salinity assessment. This is followed by leaching with fresh water. In the case of the most hurricane affected areas, this will only occur with rainfall or flooding from irrigation water (not practiced). Leaching removal of salt out of the upper soil profile will occur most readily in sandier soils with good drainage. A more effective means of reducing salinity in these soils is through the dissolution of soil salts and overland flow of salt containing water to drainage ways. This method of salinity reduction requires that farm edges and existing ditches and drainage ways are clear of debris.

4.1.7 Forest and Trees

Hurricane Maria damaged forest cover dramatically and many tree trunks remain on slopes or blocking river channels. Without the protection of vegetation, shallow landslides are more likely. A series of cascading hazards may happen, for example landslides or debris flow blocking rivers and resulting in outburst floods. And so, trees subjected to environmental stresses or injuries are usually more vulnerable to damage caused by insects, fungi and diseases. Storm-damaged trees are prime targets for a host of destructive insects and diseases.

4.1.8 Earthquakes

Dominica's seismic hazards result from tectonic and volcanic activity. Dominican earthquakes of a magnitude large enough to be recorded by seismographs on nearby islands occur at an average rate of 1-2 per year. A major earthquake of magnitude 6.5 in 2007 collapsed a church tower in Portsmouth and resulted in the damage of at least twenty houses.

4.1.9 Volcanoes

Dominica's active volcanoes present a continuous hazard. The last recorded eruption was a 1997 steam (phreatic) eruption in the Valley of Desolation, near the active Boiling Lake, but the last eruption of lava occurred approximately 500 years ago.

4.1.10 Climate

Dominica's climate is classified as tropical maritime with dominant influences from the Atlantic Ocean, Caribbean Sea, and northeasterly trade winds. It is characterized by consistently warm year-round temperatures with a daytime average of 26.5 degrees Celsius in coastal areas and 20 degrees Celsius in mountainous areas, while night-time temperatures range from 18-22 Celsius on the coast to 10-12 Celsius at higher elevations.

Rainfall patterns display annual and locational variability as the mountainous terrain creates several micro-climates. Rainfall is distributed between a dry season from December to May and

a rainy season from June to November, which is also the hurricane season. Dominica's annual rainfall totals exceed 10,000mm (400 inches) in some of the higher elevations. Relative humidity remains high throughout the year, averaging above 85%. The western Caribbean coast is in the rain shadow, where average rainfall is significantly less than in interior locations. High rainfall makes the island susceptible to landslides particularly in mountainous areas.

4.2 Biological Resources

Dominica is host to valuable biodiversity, including 1,200+ species of plants, and the most diverse assemblage of wildlife in the eastern Caribbean, including 175 species of avifauna. The Biodiversity Strategy and Action Plan (2006) provide an excellent reference document and bibliography of these resources, as well as outlining national direction for the way forward.

Dominica has a forest area of 45,000 hectares, more than half of the island's 75,000 hectare land area, with a variety of vegetation types. Since 1975, an extensive system of national protected areas has provided protection for approximately 20% of the national territory and constitutes a significant carbon sink. Protected areas include designated Forest Reserves and National Parks, which are also recognized as Important Bird Areas (IBAs). Ocean and coastal resources include two protected marine areas on the north and south ends of the island.

Dominica is also home to biodiversity of world significance. The island geography and complex geology have created unique habitats and high species diversity, such as the conservation flagship species the Imperial amazon (*Amazona imperialis* - EN) of Dominica. Dominica is part of the Caribbean Islands Biodiversity Hotspot, which is defined as holding at least 1,500 plant species found nowhere else and having lost at least 70% of their original habitat extent (Mittermeier et al. 2004). The Caribbean islands have among the highest number of globally threatened species of any hotspot in the world, supporting populations of endemic plants and vertebrates amounting to at least 2% of world's total species complement with high species endemism. Key biodiversity habitats are part of Dominica's forest system, one of the richest and most extensive ones in the Lesser Antilles. The 'Nature Island' has the most extensive natural forests in the Eastern Caribbean of around 43, 000 ha and is home to the most diverse assemblage of wildlife among the smaller Caribbean islands. The vegetation types (flora) include littoral woodland, elfin woodland, semi-deciduous forest, mature rain forest, montane forest, scrub woodland and savannah. Other natural vegetation types are influenced by soil conditions including wetlands and fumarole vegetation. Dominica's fauna includes: 179 species of birds, 55 species of butterflies, 20 species of crabs, 11 species of crayfish and shrimp, 3 species of amphibians, 17 species of reptiles (4 snakes), 18 mammal species, 11 stick insect species, and around 45 species of inland fish. (Dominica National Biodiversity Strategy and Action Plan (NBSAP), 2014-2020)).

Biodiversity, however, is threatened by habitat loss due to tourism and agriculture, compounded by a relatively weak legislative framework for biodiversity management. These threats result in adverse impacts on biodiversity and ecosystems, on the rural population dependent on them, and the broader regional and national economies. The region's biodiversity is at serious risk of species extinctions, even though destruction occurs in relatively small patches of habitat. By percentage, amphibians and mammals are among the most threatened of the taxonomic groups assessed, at 73% and 25% respectively for the region (Table 1). Biodiversity in Dominica is currently facing habitat loss, first, due to tourism development, with the most recent hotel

scheduled to open in 2019 encroaching on turtle nesting site and wetlands in the Cabrits National Park. Although currently most tourists are daily visitors arriving in Roseau, the tourism sector in the north side of the island is expected to grow with investments planned for an international airport and several international hotel chains expected to spur further tourism activity. Second, agriculture and land degradation including deforestation are two of the greatest contributors to loss of indigenous biodiversity, according to stakeholder consultations for the Dominica NBSAP, 2014-2020. Private landholdings of forested areas threaten biodiversity due to habitat fragmentation and poor agricultural practices such as the use of agrochemicals. Third, the NBSAP points out to the weak legislative framework that is not conducive to strong biodiversity management. Constraints identified were available budgets, the low contribution to economic growth by biodiversity, and lack of environmental impact assessments. Lack of carrying capacity assessment of tourism sites and management of visitors was also cited as a constraint to biodiversity. Dominica's exposure to extreme weather and to long term climate change introduce additional complexities into biodiversity management and conservation, essentially placing great premium on maintenance of healthy ecosystems in anticipation of perturbations.

Table 3: Species Diversity, Endemicity and Global Threat Status in the Caribbean Islands Hotspot

Taxonomic Group	Species ^{1,2}	Hotspot endemics ³	% Endemism	Globally Threatened	% Threatened
Mammals	104	51	49%	26	25%
Birds	565	148	26.2%	55	9.7%
Reptiles	602	494	82.1%	184	30.6%
Amphibians	200	191	95.5%	146	73%
Bony fishes	1,538	65	4.2%	42	2.7%
Cartilaginous fishes	83		0%	17	20.5%
Reef-forming Corals	91		0%	15	16.5%
Seed Plants	10,948	7,868	71.9%	507	4.6%
Grand Total	14,134	8,817	62.4%	992	7%

Sources: 1. IUCN Red List for mammals, bony, cartilaginous fishes and Reef-forming Corals; BirdLife/IUCN for birds; Caribbherp for reptiles and amphibians and Acevedo Rodríguez and Strong (2007) for seed plants.

2. IUCN and BirdLife figures refer to existent species only (EX and EW are not included).

3. Endemism figures not available for all taxa groups.

4. Corals figures include corals (Anthozoa) and fire corals (Hydrozoa).

5. Seed plants and their threat figures are included in the four following classes: Cycadopsida (Cycads), Pinopsida (conifers), Liliopsida (monocotyledons) and Magnoliopsida (flowering plants).

Poorly regulated tourism could emerge as a threat to Dominica's biodiversity, due to weak environmental controls and inadequate integration of protected areas. Dominica has not had major Caribbean-style tourism developments over the last decade but is now in the process of planning an international airport and has received interest from major hotel groups for development. The tourism growth has met a sidelined economic and political position of the protected areas. Yet forests are a central part of the "Nature Island's" touristic appeal, are vital for the protection of domestic water supplies, and support agriculture and are close to the region's only remaining indigenous community (the Kalinago community). Due to their relatively

low economic contribution as well as capacity and budget constraints, protected areas are poorly managed. Proper management plans for the three major national parks (all nearly completely forested) have either not been prepared, are out of date, or have never been formally approved and put into effect. Planning and management of public forests outside of parks (approximately 30,000ha, 60% of forest area) is minimal, and works, such as tree planting, timber harvest, stand tending, etc. is extremely limited and only conducted on an ad hoc basis as emergency needs and resources permit. Data are extremely limited, but it is apparent that timber production is negligible and not an economic priority, and wood industry, other than minor artisanal handicrafts, is non-existent.

While the tourism sector is currently placing pressures, it can be leverage to create economic value for biodiversity through nature-based tourism, thus strengthening the conservation of biodiversity. Turning biodiversity into an economic asset requires, first, better management of parks and trails, and, second, an increase in the contribution of biodiversity to the economy through improvement in the eco-tourism activity portfolio. First, Dominica's eco-tourism sector growth is plagued with weak park management for eco-tourism purposes and lack of tourism facilities in the parks. The park system and trail network can generate larger economic activity, which will support the long-term conservation of biodiversity. It can support a much larger number of visitors, create greater opportunities for associated businesses and enterprises, provide a more appealing and satisfying visitor experience, and generally be a more valuable and dynamic resource. In addition, the management of parks, including controlling encroachment on park territory, needs to be strengthened. Second, the value of biodiversity and protected areas to the economy can be increased through eco-tourism, which can incentivize biodiversity protection in the long run. Providing a rich portfolio of eco-tourism activities along the nature trails will strengthen the destination attraction and will bring direct value to the planned tourism investments. It can also diminish impacts and contain use of the parks through properly placed tourism access points, walkways and viewpoints.

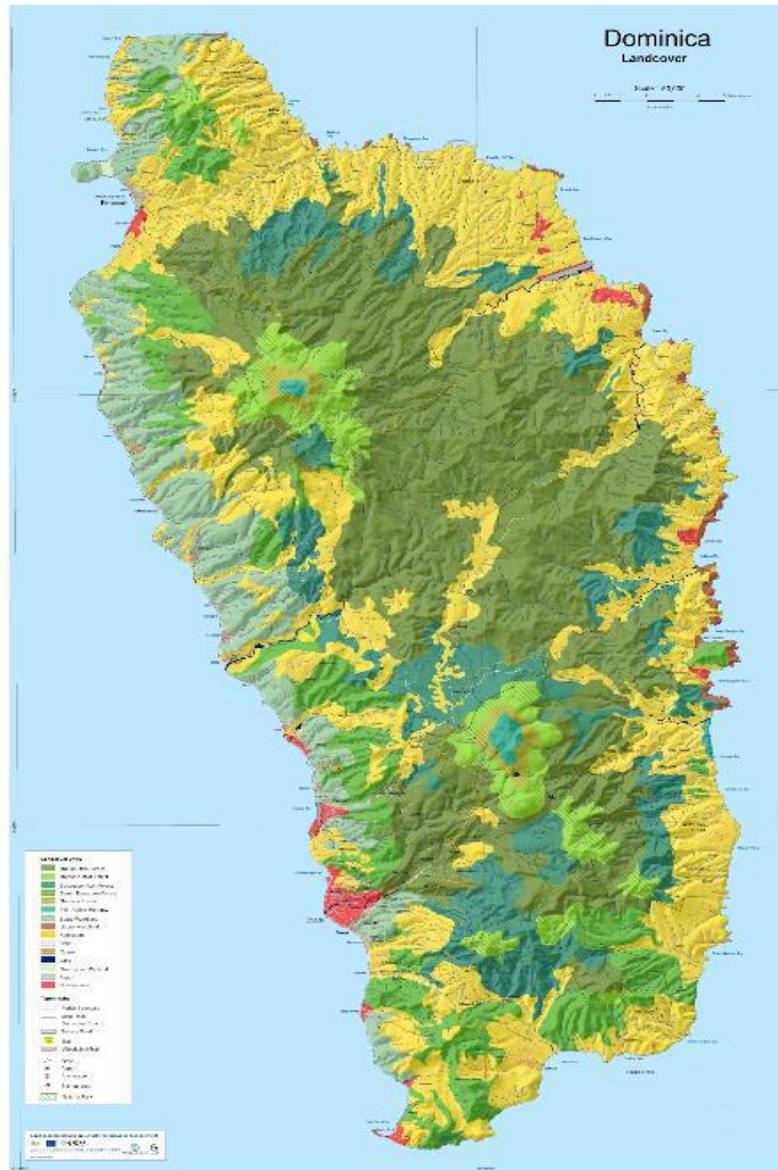
Dominica and the region have set good examples of how nature-based tourism can protect biodiversity. Smaller adventure and outdoor recreation-oriented hotels, for example, have supported conservation of the resources upon which they depend (for instance, the Dominica Nature Island Standard of Excellence). Small-scale, community-run ecotourism ventures are now open for business in several countries (for example, the Jaragua National Park Key Biodiversity Area (KBA), Dominican Republic, and the Blue and John Crow Mountains Protected National Heritage KBA, Jamaica), and the potential exists for some operations to expand with spin-offs from larger resorts and cruise ships.

4.3 Physical Cultural Resources, Human Settlement and Land Use

Dominica was originally populated by Amerindian peoples, known as Kalinago and is the only island in the Caribbean still to possess distinct communities of these indigenous people of the Caribbean. Population estimates for 2001 indicate that Dominica had a population of approximately 71,000 persons (a decline from 74,750 in 1994), including two thousand Kalinago's, the remaining survivors of the first inhabitants of the island. 27.0% of the Dominican households live below the poverty line (based on the latest available figures), Topographic conditions have forced human settlements onto narrow coastal areas particularly in the south and west with approximately 44,000 persons (62%) living along the coast (Figure 3). The largest

community is Roseau (the capital city) and its environs with 14,847 persons representing almost 21% of the total population.

Figure 3: Land Use



The rich culture and history of Dominica has created physical cultural resources, which are features or objects of interest and value to nation's people because of their archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. These may include Amerindian sites, relicts of forts or plantations, shipwrecks, or historic buildings which may have great local or international value, thus meriting attention and preservation.

4.4 Economic

The Dominica economy reflects many of the traditional features of a small open economy. This includes a high level of dependence on external trade as a proportion of gross domestic product (GDP), dependence on single sector export products (in this case agriculture) and tourism revenue, high levels of underemployment and unemployment, and dependence on foreign capital (both public and private sector) for investment into productive sectors and for infrastructural development.

The island has always been in a vulnerable position economically, socially, culturally, and environmentally. Economic developments, in particular, are significantly affected by both natural and man-made external factors as is increasingly evidenced by the negative impact on the local economy of changes associated with such international phenomenon as globalization and trade liberalization. The dependence of the economy on the constricting banana industry exposes its high economic vulnerability. Attempts to diversify are slow, however, recent trends indicate that the island is moving towards tourism/ecotourism, as it markets its unique environment and culture. In doing so Dominica has become more acutely aware of the need to protect the environment and of the growing threat to its vulnerable natural resources presented by climate change.

Dominica, by its very nature is vulnerable, given its susceptibility to natural disasters and its ecological and economic fragility. Vulnerability to climate change in Dominica, like many developing countries, is aggravated by external pressures affecting its resilience and adaptive capacity such as terms of trade, impacts of globalisation (both positive and negative), financial crises, international conflicts, rising external debt, and internal local conditions such as, rising incidence of poverty, political instability, unemployment, reduced social cohesion, and a widening gap between poor and rich, together with the interactions between them. It is widely acknowledged that climate change can exacerbate natural disasters with enormous human and economic costs.

4.5 Social

The 2011 Census indicates that the labour force stands at 30,204, comprising 17,646 or 58.4% males and 12,558 or 41.6% females. Of those, 15,482 or 57.8% of males are employed compared to 11,320 or 42.2% of females. Of the total labour force, the unemployed comprise 2,164 or 63.6% males compared to 1,238 or 36.4% females (GOCD, 2014). Thus, higher numbers of males than females are categorized as 'employed' in the paid labour force, while male unemployment is higher than that of females. These figures mask the fact that women's reproductive work in the home and informal employment are not quantified as 'work' in the labour force statistics, as well as the fact that women are more likely than men to work for no or lower wages.

Females' educational outperforms that of males at all levels however, males comprise the majority in managerial occupations (legislators, senior officials and managers) at 53.6% compared to 46.4% of females. However, women's educational achievement is evident at the levels of professionals (M: 34.4%; F: 65.6%), and technical and associate professionals (M: 47.8%; F: 52.2%). The above indicates that despite significantly higher female educational attainment, the structure of decision-making in the society is still male-dominated.

4.5.1 The Kalinago Territory

Dominica is the only Eastern Caribbean Island that still has a significant population of pre-Columbian native Kalinago (previously known as Caribs) who were nearly exterminated on other neighboring islands. The Kalinago Territory is located in the Parish of St David on Dominica's east or windward coast. It comprises 3,782.03 acres of land stretching over 9 miles, covering about 2.0 percent of Dominica's landmass. As of 2011, the population stood at 2,145, making the Kalinago Territory the largest settlement of indigenous people in the Caribbean. The socio-economic status of the Indigenous People, based on the 2009 Country Poverty Assessment

stated: “in respect of ethnic origin, indigenous persons were more likely than any other group in the population to be poor; 49.8 percent or one in two persons of indigenous origin are poor.

These Indigenous Peoples are closely tied to land, forests, water, wildlife, and other natural resources, and therefore special considerations must be paid to the extent that such ties are affected by the project. Legal residents share communal ownership of all land within the Territory, however, the authority for allocation/reallocation of land within the Kalinago Territory is in the hands of the Kalinago Chief. Segment six of the WNT passes through the Kalinago Territory providing tremendous potential in community tourism engagement and additional income generation.

Additional information can be found in the Indigenous People Planning Framework _developed for the GEF project “Leveraging EcoTourism for Biodiversity Protection”.

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5. ENVIRONMENTAL AND SOCIAL ASSESSMENT OF THE PROJECT

The environmental and social risk classification for the project is Moderate under the World Bank's Environmental and Social Framework (ESF) given that project activities will involve small scale works to improve key infrastructure on selected eco-sites, within the three national parks and the Waitukubuli Trail. Moderate classification indicates that business activities having potential limited adverse environmental or social risks and/or impacts are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures.

A summary of the preliminary environmental and social impacts by project components is presented below:

5.1 Potential Environmental Impacts

The anticipated potential environmental impacts may include, but not be limited to:

- soil removal and vegetation clearance for the rehabilitation of trails and eco-stie (e.g. gazebos, bird viewing areas, etc.) infrastructures;
- accidental damage to the flora and fauna in the area while working on the trail or the national parks;
- pollution of streams, wetlands and other freshwater ecosystems from pesticides and weedicides;
- habitat degradation and loss of ecological species population balance;
- works, individuals, visitors and community harvesting key species, both flora and fauna;
- collection, storage and disposal of construction debris/materials from trails and eco-sties;
- nuisance related to dust generation, vibration and noise during trail and eco-sites rehabilitation and construction activities; and
- occupational health and safety hazards for the workforce

The impacts are expected to be site-specific (e.g., trails, eco-sites), minimal, short-term and reversible. The exact scale of the works will be determined during preparation, and the risk rating may be updated proportionately with the level of risk if deemed necessary as preparation advances.

5.2 Potential Social Impacts and Risks

The Social risk of the project is expected to be moderate because the project will be implemented in a context where social inclusion patterns already exist, and where community consultation and grassroots participation seems to be well established. Inequitable distribution of project benefits and social exclusion is, however, a risk, whose effect would produce a disproportionate impact on the most vulnerable and disadvantaged: The poor, women, young girls, youth at risk, people with disabilities, the Kalinago indigenous community of Dominica, among others. The Project will, therefore, be designed with a social inclusion lens, to ensure that the most vulnerable, can leverage Project benefits and opportunities, and fully participate in Project stakeholder engagement activities. Project's activities will not involve involuntary resettlement and land acquisition and restrictions but it could enhance economic benefits resulting from improved

national trails and eco-sties, community employment and increased eco-tourism that would lead to increase in income sources or other means of livelihood or both. Further social risks and potential impacts of the Project are listed below.

The anticipated potential social impacts and risks may include, but not be limited to:

- Terms and Conditions of Employment to Project Workers in line with ESS2 not complied with.
- Hazards to project workers. People employed or otherwise engaged to work on the project could be exposed to a number of hazards, which present risks of illness, injury or death. Field surveys or patrols in forest ecosystems carry a risk of falls in steep terrain, drowning in rivers and bites from venomous animals. Field work in coastal ecosystems carries a risk of drowning. Activities involving travel carry a risk of road traffic accidents in addition to exposure to infectious diseases, including COVID-19. In addition, project workers throughout the Nature Island are exposed to an elevated risk of natural disasters, especially during the annual hurricane season.
- Hazards to local people, local people involved in project activities, for example as trainees, community tour guides or meeting participants, could be exposed to a similar range of risks to those outlined above. A particular risk during the project period will be transmission of COVID19 to remote rural communities, who may have limited access to healthcare. The risk of COVID-19 applies to all project activities involving local people.
- Physical, psychological or sexual abuse of project workers. Project workers could be exposed to physical, psychological or sexual abuse. Risks include both physical forms of abuse (such as violence and sexual assault) and non-physical forms (such as verbal abuse, bullying and unwanted sexual attention), with the latter being more prevalent in the workplace. These risks apply to workers on Project investments. Special attention needs to be given to gender dimensions of the workplace environment, because women, in particular, may be especially vulnerable to sexual exploitation and abuse and sexual harassment.
- Unfair treatment or discrimination of project workers. As well as being exposed to abuse, project workers could be subjected to unfair treatment or discrimination on the basis of personal characteristics unrelated to job requirements, such as race, gender, religion and sexual orientation.
- Health impacts from unsafe storage chemicals or hazardous substances used. As described above, some Project investment are expected to have recourse to the use of pesticides to control or eradicate Invasive Alien Species. As well as posing environmental risks, chemicals present risks of people (both project workers and local communities), if they are stored or used unsafely. The most serious risks include disease (including cancer) and death through poisoning.
- Park Wardens engaging in unlawful or abusive acts against local people. These Park Wardens or Forester's primary responsibilities are to ensure that visitors to an ecotourism site have a valid entry pass and oversee the general supervision and maintenance of the ecotourism facility. Other duties performed includes that of security of the ecotourism

site ensuring that environmental laws are adhered. Therefore, the project will provide training in communication, how they use their authority so as not to exhibit any forms of sexual exploitation and abuse nor sexual harassment on visitors, especially the vulnerable (disabled, women) or project workers.

- Restrictions on access to natural resources within a protected area or communally managed property. Enforcement of protected areas and the strengthening of protected areas management regulation can place limitations on access to natural resources, which can, in turn, have adverse impacts on local people. These impacts include loss of income, diminished social cohesion, reduced economic resilience and loss of cultural identity. Persons with a greater level of dependency on natural resources may be more severely impacted, and they may include some of the most vulnerable members of society (e.g., landless, women headed households, elderly, etc.). The project will develop a Process Framework to address land restriction issues.
- Disturbance or damage to cultural heritage. Some Project activities may take place at sites with tangible or intangible cultural heritage. For instance, the Morne Trois Piton national park recognized as a UNESCO World Heritage Site. Project activities, in particular promotion of nature-based tourism, could inadvertently impact key elements of this heritage, for instance by damaging archaeological remains, or disturbing sites of historical or spiritual significance to local communities. Moreover, sub-projects that seek to preserve and promote awareness of cultural heritage could be seen as “exploiting” it by local people, if this is not done sensitively and a participatory manner.
- Increased risk of elite capture of and/or social exclusion from project activities and/or benefits. Given the scale and nature of the sub-projects, many will be unable to engage all members of target communities in project activities or ensure that all receive benefits, such as increased income or employment opportunities. In this context, there is a risk of elite capture, leading to vulnerable and disadvantaged groups being excluded from project activities and/or benefits. This risk will be mitigated via a robust stakeholder engagement process, which ensures that all vulnerable and disadvantaged groups are identified, consulted, and provided with opportunities to participate in and benefit from project activities.

Table 4: Summary of Preliminary Environmental and Social Impacts Assessment by Components

Component	Subcomponent	Activity	Preliminary Environmental Impact	Preliminary Social Impact
<p>Component 1: Protected Area Planning</p>	<p>Subcomponent 1.1: Strengthening the institutional framework for planning management.</p>	<p>Update and revise management planning and zoning for the WNT, the Morne Trois Pitons National Park and the Morne Diablotin National Park and the Cabrits National Park, with a focus on increasing the eco-tourism activity portfolio.</p>	<p>This subcomponent represents a positive environmental impact as it will promote sound management and monitoring of natural resources</p>	<p>This subcomponent represents moderate risks but reduces social exclusion by the implementation of the SEP and IPPF/IPP, including without limitation involvement of vulnerable stakeholders in Project design and consultations</p>
	<p>Subcomponent 1.2: Improving national and local capacities for PA monitoring and management</p>	<p>To strengthen capacities for biodiversity monitoring and protection at the national level. It will also provide limited equipment and supplies for monitoring, data collection and sampling, especially for the Forestry Division within MERMKU.</p>	<p>This subcomponent will not generate any negative environmental impacts.</p>	<p>This subcomponent will not generate any social impacts.</p>

Component	Subcomponent	Activity	Preliminary Environmental Impact	Preliminary Social Impact
Component 2: Biodiversity and Sustainable Nature-based tourism Operations	Subcomponent 2.1: Enhancing biodiversity knowledge and awareness, and visitors' access, safety and experience	To enhance infrastructure used in the access to and interpretation and presentation of Dominica's biodiversity. Secondly, propose the introduction of an e-ticketing system	This subcomponent will generate positive environmental impacts by providing awareness of the PA and the WNT. Knowledge and awareness provide a sense of responsibility and visitors are more keen to protecting natural resources.	This subcomponent will generate positive social impacts by providing awareness of the PA and the WNT. Secondly, tourism experience will be enhanced through the introduction of the e-ticketing system
	Subcomponent 2.2: Increasing capacities and resources for nature-based tourism trail management	Provides for capacity building in trail management for key stakeholders, namely the Forestry Division and the Kalinago community. It will also include the preparation of a Divisional Operational Manual with procedural guidelines for trail management.	This subcomponent will generate positive environmental impacts as it will improve on the skills of the Staff of the Forestry Division	Involving Project stakeholders in the management of the natural tourism sites. This will be supported by the SEP and IPPF/IPP.

Component	Subcomponent	Activity	Preliminary Environmental Impact	Preliminary Social Impact
Component 3: Sustainable Livelihoods	Subcomponent 3.1: Enhancing opportunities for sustainable livelihoods	To provide for the development framework and investment support for sustainable land use and nature-based tourism operations and to enhance opportunities for livelihoods through empowering Kalinago women and youth in cooperative initiatives.	This subcomponent will generate positive environmental impacts as it will promote the sustainable use of natural resoucerce for the enhancement of the Kalinago Community.	Enable local communities, particularly the Kalinago (with a focus on women), to engage in business development opportunities for eco-tourism, through capacity building, jobs, training and other Project benefits.
	Sub-component 3.2. Reviving traditional Kalinago knowledge	To increase the capacities in traditional knowledge and skills within the Kalinago community, particularly among the youth.	This subcomponent will generate positive environmental impacts However, The sustainable harvest of plant material for the making of art craft needs to be managed to avoid overharvesting and cause land degradation.	Enable the Kalinago (with a focus on women and youth), to maintain their traditional knowledge as a tool to foster ecotourism growth. engage .
Component 4: Project management		Finance project management and	The project will transform the tourism	The project will have positive social

Component	Subcomponent	Activity	Preliminary Environmental Impact	Preliminary Social Impact
		<p>monitoring costs, within the funding limits established by GEF.</p>	<p>sector from being a potential threat to a sustainable opportunity for the management and protection of biodiversity in Dominica.</p>	<p>benefits at local, national, regional and global levels. At the local level, direct project beneficiaries include communities and their members in targeted landscapes, and particularly: individual entrepreneurs, small, medium and micro-sized enterprises (SMMEs), community-based organizations (CBOs), such as co-operatives, communal property associations (CPAs), and community trusts.</p>

6. ENVIRONMENTAL AND SOCIAL MITIGATION MEASURES

Both environmental and social risks and impacts of the project are related to the small scale works that will transform the tourism sector from being a potential threat to a sustainable opportunity for the management and protection of biodiversity in Dominica. The link between the predicted environmental impacts, the needed mitigation measures identified during the screening and assessment process, provisions for budgeting the costs of such measures, and the roles of those responsible for ensuring that the mitigation measures that will be carried out are summarized in the Site-specific Environmental and Social Management Plans (ESMPs).

6.1 Mitigation Measures

These are specific actions recommended to address the potential impacts of projects; to reduce, avoid mitigate and or compensate the negative environmental and social impacts identified in the impact assessment of the project proposed activities (Section 5). As a result of the impact identification assessment, it is evident that the most imminent potential impacts are associated with pollution of streams or freshwater ecosystems, habitat degradation, loss of ecological species, labor and community health and safety, and solid and hazardous waste management. These types of impacts would require additional assessment and analysis to design the appropriate mitigation measures as soon as the detailed project actions are identified. A screening process that shall be used to identify the type and scope of risks and impacts of all sub-projects is described in detail in Section 8 and Annex 1 of this ESMF.

Additional mitigation measures would be derived from any conditions imposed by any statutory agency who reviewed the sub-projects and provided recommendations. These could also be converted to contract clauses as necessary.

6.2 General Considerations

This section of the report is related to the identification of appropriate measures that need to be considered in order to minimize or eliminate negative impacts and to enhance positive impacts. In any event, the application of good implementing activities and management practices is of paramount importance. Public consultation on Project overall, the draft ES risk management documents, as well as Project impacts, and opportunities and risk mitigation strategy is also necessary. The affected persons should be informed of the potential problems and mitigation measures. Their concerns and suggestions should also be given due consideration and incorporated in the Project and its documents, here possible. Wherever possible, employment should be considered for the local people, with a preferential hire being provided to Kalinago and women. This will enhance cooperation and support for the project. Although most of the negative impacts are minor, the following mitigation measures are necessary because of their significance.

6.3 Specific Considerations -Depreciation of the Natural Environment

A general issue for any activity of the project is the generation of wastes and/or leftover substances and materials. As such, all materials and substances such as pesticides, weedicides, toxic substances, and liquid wastes are not disposed-off in open soils, streams, rivers or places where they can eventually run-off into the surface and underground water system. Also, in order

to prevent soil loss and erosion, indiscriminate land clearing and excavation along the national trails and eco-sites are not permitted.

6.4 Labor and Working Conditions

For the prevention and mitigation of potential risks and impacts for labor and working conditions, an instrument has to be prepared to meet the requirements of the Environmental and Social Standard of the World Bank (ESS2); This standard is relevant for this project, given the fact that the project has the potential for hiring specialized personnel and laborers for different aspects and phases of its implementation. Worker categories under this standard, that may be relevant for the project includes direct, contracted, community and primary supply workers. To comply with the ESS2 and national laws, a project-level Labor Management Procedures (LMP) has been prepared that identifies the different types of project workers that are likely to be involved in the project, as well as workers management procedures. The LMP contains measures to address potential risks and impacts that may arise from the interaction between project workers and local communities.

It also includes a Code of Conduct and an Occupational Health and Safety Plan (OHSP) that is in line with the ESMF and the World Bank Group (WBG) Environmental Health and Safety Guidelines to ensure health and safety conditions of workers during construction activities. Some OHS hazards identified with the project activities are, but not limited to: (i) falls from heights; (ii) exposure to dust and hazardous materials; and (iii) failure to use proper protective equipment during the rehabilitation of trails and construction of eco-sites.

It is important that the Project complies with the WB environmental and social standards: no child or forced labor, promoting transparency in terms and conditions of employment, non-discrimination and equal opportunity. In order to comply with these requirements a Labor Management Procedure has been prepared which includes a GRM specifically for project workers to ensure they have a mechanism in place for complaints and grievances.

6.5 Mitigation specifications

There are always impacts associated with the implementation of projects activities. Most of the negative impacts associated with the sub-components for this project, are expected to occur during the rehabilitation/construction/installation phase. While these impacts are not expected to be major, the careful implementation of mitigation measures will allow for the reduction or avoidance of any adverse effects. These general impacts have been identified in chapter 5 and Table 5 below indicates the list of all potential mitigation measures related to these activities. The measures are presented in a manner that makes them easy to be incorporated into an Environmental and Social Management Plan (ESMP) and, with appropriate adjusting, can become contract clauses for the contractor who will undertake the minor civil works. This also allows for ease of monitoring activities throughout the project cycle. Pesticides, including weedicides use is also included in the standard ESMP below (note that the use or purchase of significant amounts of pesticides is not eligible under the Project).

Table 5: Impact and General Mitigation Measures

IMPACTS	GENERAL MITIGATION MEASURES	SPECIFIC MITIGATION MEASURES
Sourcing of construction materials	The excavation of quarries and borrow pits, used for obtaining rocks, soil and aggregate materials for the activities proposed under this project will be sourced from locally. Materials such as sand cement, steel rods and other would be required during construction.	The construction materials such as sand, clay, aggregates etc. shall be sourced from sustainable certified quarries and sellers.
Construction site	Construction areas are properly delimited with physical barriers	Construction areas are safeguarded with fences and safety barriers to keep the project and the workers on the site safe from trespassers, interruptions, and other inconveniences, and prevent passers-by from accidentally entering the site and being hurt by equipment or falling material.
Soil Erosion and Slippage	Indiscriminate land clearing and excavation should not be permitted. Appropriate drainage system should be implemented. Direct disposal of waste (hazardous, pesticides, solid etc.) in ground and open soil should not be permitted.	<ul style="list-style-type: none"> (a) Contractors must ensure that appropriate erosion control measures such as silt fences are installed. (b) Proper site drainage must be implemented, including drainage at the tops of slopes, around slopes, and beneath roadways. Any drain clogged by construction material or sediment must be unclogged as soon as possible to prevent overflow and flooding. (c) The use of retaining structures and planting with deep rooted grasses to retain soil during and after works must be considered. (d) The use of bio-engineering methods must be considered as a measure to reduce erosion and land slippage. (e) Keep angle of slopes within limits of soil type.
Air Quality	Air pollution: in order to help mitigate; regular inspections of machinery and equipment used in the operation must be performed, to ensure their good working condition, and dust prone areas and material should be covered.	<ul style="list-style-type: none"> (a) Construction materials such as sand, cement, or other fines should be kept properly covered. (b) Cement should be kept stored within a shed or container. (c) The sand and fines should be kept moistened with sprays of water. Unpaved, dusty construction roads should be compacted and then wet periodically. (d) The surrounding environment shall be kept free of debris to minimize dust. There will be no open burning of construction / waste material at the site. (e) There will be no excessive idling of construction vehicles at sites. The bins of all

IMPACTS	GENERAL MITIGATION MEASURES	SPECIFIC MITIGATION MEASURES
		haulage vehicles transporting aggregate or building must be covered on all public roads.
Noise (Vibration and noise nuisance)	<p>For these impacts, supervision of working conditions has been included as a routine measure and includes: Daily regular inspection of machinery and equipment used in rehabilitation or construction activities to ensure that they are in good working condition, thus avoiding excessive vibration and noise. Noise generating sources must be located away from communities or noise sensitive receptors to meet the noise emission levels provided by the local legislation or in its case those as are indicated in World Bank IFC's General EHS Guidelines.</p> <p>Workers in noisy working environment must use of noise suppression PPE, and those noise emitting sources must be shielded and mufflers.</p>	<p>haulage vehicles transporting aggregate or building must be covered on all public roads.</p> <ul style="list-style-type: none"> (a) Construction / work activities will occur within specified daylight hours (as establish by local legislatures). (b) Temporary noise barriers will be installed at the rehabilitation or construction sites to minimize harmful the noise levels. (c) Community / public to be informed in advance of any work activities to occur outside of normal working hours or on weekends. (d) During operations, the engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed as far away from communities or noise sensitive receptors/areas as possible. (e) There will be no excessive idling of construction vehicles at sites. Noise suppression equipment or systems supplied by manufacture will be utilized. (f) Ensure all vehicles and equipment are properly serviced. Contractors must develop and implement a public notification and noise management plan, consulted and agreed with the local community were works are taking place. (g) Workers must use noise suppression PPE.
Non-Hazardous waste	Waste Management (general)	<ul style="list-style-type: none"> (a) Contractors to develop and implement waste management plan in consultation with the local solid waste authorities. (b) Contractors to abide by all pertinent waste management and public health laws. (c) Waste collection and disposal pathways and sites will be identified for all major waste types expected from rehabilitation and construction activities. (d) Construction and demolition wastes will be stored in appropriate bins. (e) All waste will be collected and disposed of properly in approved landfills by licensed collectors. The records of waste disposal will be maintained as proof for proper management as designed. (f) Whenever feasible the contractor will reuse and recycle appropriate and viable materials (except asbestos or other hazardous material)

IMPACTS	GENERAL MITIGATION MEASURES	SPECIFIC MITIGATION MEASURES
Hazardous waste	Pesticide and Liquid Waste Management for hazardous substances	<ul style="list-style-type: none"> (a) Contractors must provide temporary storage on site for all hazardous or toxic substances in safe containers labelled with details of composition, properties and handling information. The containers of hazardous substances shall be placed in a leak-proof container to prevent spillage and leaching. The wastes shall be transported by specially licensed carriers and disposed in a licensed facility. (b) Paints with toxic ingredients or solvents or lead-based paints will not be used. (c) Banned chemicals will not be used on the project. If pesticide or weedicide treatment is to be utilized, appropriate chemical management measures will be implemented to prevent contamination of surrounding areas and use only licensed and registered pest control professionals with training and knowledge of proper application methods and techniques. (d) Any project which involves the purchase or use of pesticides, other than incidental amounts (for example termite treatment in item (c) above), will be excluded during the screening project.
Wastewater	Wastewater pollution management	<ul style="list-style-type: none"> (a) Sanitary facilities must be provided for all workers on site. (b) Liquid and chemical wastes will be stored in labelled containers which will be separated and secure places (out of reach of the public). (c) Construction related liquid wastes must not be allowed to be accumulated on or off the site, or to flow over or from the site in an uncontrolled manner or to cause a nuisance or health risk due to its contents. (d) If works are to be done along coastal marine areas or near major streams and rivers, water quality monitoring must be done before rehabilitation / construction, and at regular intervals during rehabilitation / construction to determine turbidity levels and other quality parameters.
Biodiversity	Pollution of terrestrial environment (flora/fauna). And encroachment on protected, sensitive /fragile ecosystems	Ensure that all project activities are not located on or close proximity to natural or critical habitats or areas of high ecosystem value.

IMPACTS	GENERAL MITIGATION MEASURES	SPECIFIC MITIGATION MEASURES
	should be avoided for any activity of the project.	
Chemicals	<p>Pesticides, weedicides, oil, grease, toxic substances and waste should not be disposed-off on streams, rivers or places where they can eventually end up in the sea or soils.</p> <p>In order to ensure environmental mitigation and good practice; A Pollution Implementation Plan (PIP) must be prepared and approved by the relevant authorities when the exact location of proposed project activities is identified. It should indicate the precise location of the activities, in relation to existing environmental resources and implementation process. It should also include a) spill Prevention and Control Plan; b) Waste Management Plan, c) Hazardous Materials Management Plan</p>	<p>(a) The contractor must implement all necessary waste management plans and measures.</p> <p>(b) All construction materials, including chemicals, must be safely stored.</p>
Energy Efficiency	<p>Energy consumption and efficiency</p> <p>Energy efficiency measures will be considered for all project activities</p>	<p>(a) Project activities will promote the use of energy efficiency and feasible and where possible the project will promote consumption of renewable energy.</p> <p>(b) Advanced designs and construction techniques shall be considered. These may include reduce heating, cooling, ventilation and lighting energy consumption. The project will also upgrade buildings and replace equipment with energy-saving devices.</p>
Water efficiency	<p>Water consumption and efficiency</p> <p>Water-efficiency measures will be considered for all project activities</p>	<p>Project activities will promote the use of water efficiency measures such as low-flow fixtures, sensors, use of non-potable water for irrigation applications.</p>
Occupational Health and Safety	Occupational Health and Safety	<p>(a) Contractors must ensure that an Occupational Health and Safety Plan is in place to guide work activities and provide a safe environment for workers.</p> <p>(b) Contractors must ensure that all workers have received regular training to perform</p>

IMPACTS	GENERAL MITIGATION MEASURES	SPECIFIC MITIGATION MEASURES
		<p>their job, as well as daily inductions prior to work activities have taken place.</p> <p>(c) Contractors must ensure that all workers operate within a safe environment. All relevant Labor and Occupational Health and Safety regulations must be adhered to ensure worker safety.</p> <p>(d) Workers must be provided with necessary equipment and PPEs (hard hats, overalls, gloves, goggles, boots, etc.) as per their specific tasks.</p> <p>(e) Sanitary facilities must be provided for all workers on site.</p> <p>(f) Contractors must ensure that there are basic medical facilities on site and that there are staff trained in basic first aid.</p> <p>(g) Appropriate posting of information within the site must be done to inform workers of key rules and regulations to follow.</p>
Cultural heritage	Accidental destruction of previously unknown cultural heritage (Chance-finds procedure)	<p>(a) Contractors must ensure that provisions are put in place so that artefacts or other possible “chance finds” encountered in excavation or construction are noted and registered, and responsible authorities contacted, and works activities delayed or modified to account for such finds.</p> <p>(b) No item believed to be an artefact must be removed or disturbed without clearance from the responsible authorities.</p>
Physical, psychological or sexual exploitation and abuse or sexual harassment of project workers.	Labour and Working Conditions	<p>Establish and promote specific grievance mechanisms</p> <p>Provide workers with workplace environment training</p>
Restriction to Land-Use	Change in Land Use along ecotourism site	Development of a Process Framework Minimize area / activities covered by restrictions; exempt community members in highly vulnerable groups
Hazards to project workers and visitors	Safety on ecotourism site	<p>Avoid scheduling visits or tours during hurricane season, especially when notified of approaching bad weather system.</p> <p>Provide training in health and safety to local people; provide personal protective equipment; implement health and safety plan</p>

IMPACTS	GENERAL MITIGATION MEASURES	SPECIFIC MITIGATION MEASURES
		Establish and promote grievance mechanisms.
Unfair Treatment or Discrimination of Workers	Avoid discrimination	<p>Provide Contractors with hiring / firing authority training in fair treatment / nondiscrimination</p> <p>Encourage Contractors to provide project workers with copies of their employer’s human resources policies</p> <p>Ensure that no child under the legal minimum age or the age of 14 (whichever is lowest) be employed or engaged in connection with the project.</p> <p>Ensures that no child under the age of 18 may be employed or engaged in connection with work that is likely to be hazardous, interfere with the child’s education or be harmful to the child’s health or physical, mental, spiritual, moral or social development.</p> <p>Requires that decisions relating to the employment or treatment of project workers will not be made on the basis of personal characteristics unrelated to inherent job requirements (e.g., gender, race, religion, sexual orientation, etc.) but be based on the principle of equal opportunity and fair treatment</p>
Elite Capture or Social Exclusion from Project activities	Stakeholder Consultations	Conducting a robust stakeholder engagement process, which ensures that all vulnerable and disadvantaged groups , including women and the Kalinago are identified, consulted, and provided with opportunities to participate in and benefit from project activities.
Park Wardens and Foresters who has the responsibility to enforce the law based on non compliance to hunting regulations and removal of wildlife.	Stakeholder Consultations Avoid Discrimination	<p>Provide training for Park Wardens, Tour Guides and Forester in the appropriate conduct towards tourist and the communities; implement codes of conduct.</p> <p>Provide additional training to the Park Wardens</p> <p>Establish and promote grievance mechanisms for local communities; maintain a list of GBV providers within the Bureau of Gender Affairs and ensure that their services are available to stakeholders who may be the survivors of GBV.</p>

7. ENVIRONMENTAL AND SOCIAL SCREENING PROCEDURES

7.1 Screening Process

The Environmental and Social Screening is intended to ensure that proposed investments are subject to the appropriate extent and type of Environmental and Social Assessment (ESA) needed. The first step of the screening procedure will be the preparation/provision of a screening form designed to capture the necessary information about potential environmental and social impacts associated with the proposed activities. The screening form will have to be completed by the PIU and submitted to the World Bank for review and 'No Objection'. The PIU Environmental and Social Screening checklist have been included in Annex 1.

If, through the use of the Environmental and Social Screening Checklist the project analyzed is found to have no impacts on the environment and social aspects, no further action will be required. However, if impacts are identified, whether they may be mitigated or not, the project screening results are to be brought to the attention of the Project Manager of the PIU and shared with the World Bank for their review, feedback or no objection.

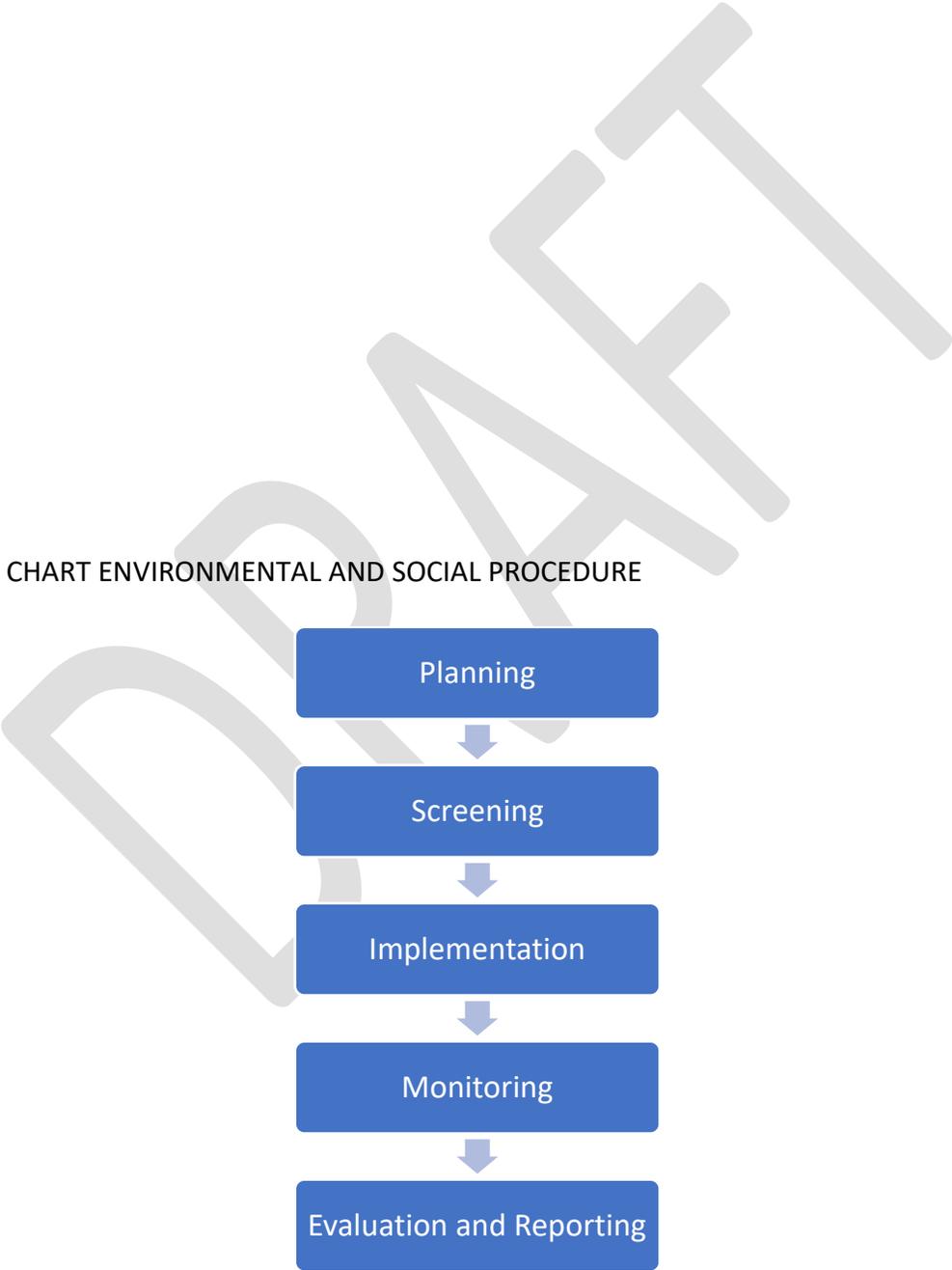
Depending on the results of the completed checklist, the Environmental and Social specialists of the PIU will guide the preparation of ESMP or Environmental Social Impact Assessment (ESIA). The ESIA applies if the project may create minor environmental and social problems that require frequent monitoring or project design modifications to minimize or eliminate the impacts. In accordance with normal procedure, copies of the above will then be submitted to the relevant environmental and social official/authority by the PIU for review and publicly disclosed.

7.2 Permitting new structure/ facilities through physical planning

The PIU will be required to consult the relevant authority with legislated responsibility for granting planning permits or approvals for project related activities. For all World Bank projects all laws and regulations and guidelines pertaining to planning an environmental protection in the Commonwealth of Dominica must be followed and obtained from the Physical Planning Division. The Project will require Planning permission for the construction of ecotourism facilities, viewing platform and Gazebos.

The evaluation, screening and scoping of activities and projects by the relevant Planning authority may conclude that certain projects or activities require that an ESIA be conducted. In such cases, then any mitigation requirements or conditions from that ESIA should be included in the relevant contracting language to ensure that they are carried out.

FLOW CHART ENVIRONMENTAL AND SOCIAL PROCEDURE



8. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

This instrument is prepared as a guideline for the preparation of site-specific Environmental and Social Management Plans (ESMP) for Project investmentProject activities that are still pending for a final design and site assignment. Usually, the ESMF is used to guide the development of specific ESMPs, in view that general activities and impacts for the project concept design have been identified, but that specific details on the activities for the implementation of the Project investment are not known. As such, a template of a generic ESMP for the project has been included below that will need to be finalized into a detailed ESMP once details and impacts are known and specific investments identified. The number, scope, and type of plans, procedures, programs, to be included in each ESMP is not limited, and it should be developed according to the project needs. It is also expected that in the case of environmental and social risks or impacts that have not been identified or included in this ESMF, a plan can and should be prepared using the recommended formats.

8.1 Environmental and Social Management Plans: Guidelines for Project investmentProject investments

An Environmental and Social Management Plan (ESMP) is a technical assessment document for identifying environmental and social impacts of site specific investments under this Project. This instrument predicts those relevant environmental and social impacts that a project and its activities could create during its implementation (construction, operations, and closure). The ESMP includes environmental and social impact mitigation and control measures, as well as its predicted costs, and also the time and length for those measures to be implemented, and the responsible parties for it. The responsibility to prepare the ESMP prior to implementation of any Project investments plans rely on the environmental and social specialists at the Project Implementation Unit (PIU).

8.2 Project investment Identification Procedures

In order to determine the extent of the environmental and social management plans for each Project activity; an identification procedure will be performed using a specially designed form (Annex 1). The form is used to determine what type of ESMP will be needed for each case. The identification process for Project investments will also ensure that its implementation activities that could generate a potential negative impact will not be non-compliant with the Environmental and Social Standards of the WBG (ESSs). These are:

- ESS 1: Assessment and Management of Environmental and Social Risks and Impacts;
- ESS2: Labor and Working Conditions;
- ESS3: Resource Efficiency and Pollution Prevention and Management;
- ESS 4: Community Health and Safety;
- ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities;
- ESS8: Cultural Heritage;
- ESS 9: Financial Intermediaries; and
- ESS 10: Stakeholder Engagement and Information Disclosure

8.3 Guidelines for the Preparation of the Environmental and Social Management Plans (ESMP)

These site specific ESMPs will be prepared based on this ESMF, the World Bank ESSs and the technical norms and local legislations that are pertinent to the project design and implementing process during the construction, implementation and closing phases. The following plans have been identified for the project based on the activities to be financed.

8.4 Environmental and Social Management Plan

An ESMP must include the following items, as indicated below:

- Legal Framework

This will support the bases of the ESMP's in each one of the project implementation locations, and this is based in the World Bank ESSs, the National legislation, regulations, resolutions, norms, international treaties, and other legally binding instruments that applies to the project.

- Institutional Framework

This includes the institutions involved in the project administration, management and operations. These will be identified and their roles and responsibilities during project phases (pre-construction, construction and operations) will be defined.

- Implementation Plan

Without considering the size and complexity of a project a schedule, all project activities must be prepared using a double entry matrix were activities are set against execution time, with estimative starting and finishing dates for the project implementation.

- Environmental and Social Risks Assessment: Mitigation Measures Adopted

Specific risks analysis of the specific Project investment implementation will be required to be part of all ESMP's for each implementation project sites, including those regarding violence and gender issues. These specific ESMP's must include prevention, avoidance and mitigation measures that will be identified, and previously approved by projects authorities before the ESMP's implementation.

- Budget and Costs

In each phase of the project a budget with the costs of the ESMP must be prepared, specifically for each managerial action proposed. These budgets must be prepared in charts showing costs estimations categorized for each managerial activity presented, including those contingency expenditures and expending charted chronogram. The budget will be itemized, following the project administrative/financial organization protocols.

- Public Consultation Mechanism and Documentation of Consultations Held for the ESMP

The information provided to the project participants and workers, as well as the communities and stakeholders must be early and appropriate. Procedures must be established for solicitation, convened and training to workers and affected communities. Amongst the potential topics to cover are: labor ethics, responsibilities and rights, sustainable daily issues and behavior, care for nature and biodiversity, environmental management. For information mechanisms to communities and workers the following could be included: written information (press), radio, internet, social medias, workshops, etc. For public consultation of project activities must be preform before the project implementation, at the design level in the pre-construction phase. This activity is a mandate of ESS10 and demands the local stakeholder's active participation and will be continuous throughout the all the project phases and live. The resultant consultations will be included in the ESMP's for the different project activities.

- Grievance Redress Mechanism (GRM)

The procedures for the GRM are based on the ESS10 of the WB and the GRM is established in detail in the Project SEP, this process will follow a format as presented in Section 10 of this ESMF. In general terms will include actions such as registry and chart log of visits, complaints, observations, and comments of all interested parties.

- Follow-up and evaluation

The mechanisms for follow-up and evaluation must be design and implemented throughout the project phases, to have controls of all actions, by measuring its efficiency and effectiveness and compliance. This will assist in preparing evaluation reports that will address the improvement or actions required. This mechanism will include project supervision from the Project Implementation Unit, contracted supervision and World Bank supervision. It will require reporting (weekly, monthly, quarterly), inclusive of daily logs, verification and technical, environmental and engineering reports as agreed.

- Adaptive risk management arrangements

These are defined as alternative managerial actions different from what was originally planned. These managerial arrangements are to be adopted due to changes that occur during project

implementation, caused by unforeseen events that generate a need for an adaptive management decision in view of the new and unexpected situation.

8.5 Waste management during construction, operational and closure phase (WMP)

The following guidelines are included in order to develop the Waste Management Plan during the construction, implementation and closing phases. The WMP must follow and comply with the ESS3 of the Environmental and Social Framework, and its extent of application will depend on the project activities that will be performed at each project site. It will include the integral management of solid, liquid, and gases wastes. It shall include measures to manage asbestos and other dangerous materials (electrical wastes, toxic chemicals and paints, etc.), that could be used or be generated during the demolition, construction, upgrade or renewal of installations and infrastructure; as well during implementing activities (paper, office materials, paints, etc.), replacement of electrical equipment (computers, servers, cables, etc.). This plan must comply with the existing country legislation and regulations. The basic content should include:

- Objective of the managerial waste plan
- Legal framework
- Institutional framework
- Site and surroundings diagnostics and characteristics
- Possible environmental and social impacts
- Evaluation of the environmental and social impacts
- Measurements for waste management during construction and operational phase of the project
- Arrangements for permits for final disposal of the different types of wastes that the plan entitles
- Implementation plan
- Budget and costs
- Stakeholders Consultation plan
- Grievance Redress Mechanism
- Follow up and evaluation
- Adaptive management arrangements

Objective of Waste Management Plan

Based on ESS3, the plan must establish responsibilities in relation with the risk and impact levels during the different project phases. Thus, the generation of waste must be considered from the very beginning; during the pre-design contracting, construction and implementing phases. In all cases provisions shall be taken in order to minimize the production of waste, and those that can be minimized must follow an integrated management plan to properly reduce, manage, and dispose all types of waste that could be generated by all the different project activities. By doing so, the project will avoid a negative affectation to stakeholders and livelihood, biodiversity and habitats nearby and surroundings of the project site and activities.

8.6 Traffic Management Plan (TMP)

Following the mandates in the Environmental and Social Framework: ESS1, ESS2 and ESS4, and taken into consideration each project phase and that all the location of the project activities will have different landscape configuration, roads, access, etc., this plan will provide specific measures to be implemented to ensure a proper traffic management while minimizing security risks and impacts to the affected communities. This plan must consider the following: amount of vehicular traffic, pedestrian, the universal principle of open access to sites, the uses of signs, and control mechanisms to allow the free and orderly movement, safe and predictable, guided and a warning to school, hospitals, neighbours and stakeholders nearby the project installations during construction and operational hours. The basic content of a traffic management plan should include:

- Objective of Traffic Management Plan
- Legal frame
- Institutional frame
- Site and surroundings diagnostics and characteristics
- Possible environmental and social impacts
- Evaluation of the environmental and social impacts
- Measurements for traffic management during construction and operational phase of the project
- Implementation plan
- Budget and costs
- Stakeholders Consultation plan
- Grievance Redressal Mechanism
- Follow up and evaluation
- Adaptive management arrangements

Objective of Traffic Management Plan

These objectives are based on the guidelines of the Environmental and Social Framework of the WB: ESS1, ESS2 and ESS4, and determine the responsibilities in relation of the evaluation, management and follow-up of the environmental and social impacts associated to the project implementation phases. In the case of Traffic Management Plan (TMP), this must include the pre-design, construction and operational phases, with recommended actions to avoid, reduce and minimize those potential impacts generated by traffic and increase traffic in and around the project site, during construction and operation. This plan will avoid all major disturbance of existing traffic, prevent blockages, and permits free flow of vehicles in the community were the projects are installed.

8.7 Labour Management Procedures (LMP)

This procedure seeks to ensure the inclusion of measures, to manage risks associated with employment under the Project, and to help determine the resources needed for planning and management. It sets out the approach to meet the national requirements, as well as the objectives of the World Bank's Environmental and Social Framework, specifically the objectives of ESS2: Labour and Working Conditions and Occupational Health and Safety. Based on the Project's

Environmental and Social Assessment, for this project, risks are considered minimal in regard to labour and working conditions, as well as occupational health and safety. During operations the Plan will ensure that project management will be committed on a continuous basis throughout the life of the project, to evaluate risks and impacts and to have in place adequate measures and procedures to manage adverse impacts. The Code of Conduct will also be adopted throughout project implementation. It is important to note the LMP is a living document and can be updated to meet the demands of the Project. The basic contents of a Labor Management Procedures include:

- Objective of Labour Management Procedure
- Legal framework
- Institutional framework
- Standard code of conduct for workers
- Implementation plan
- Budget and costs
- Stakeholders Consultation plan
- Grievance Redress Mechanism
- Follow up and evaluation
- Adaptive management arrangements

Objective of Labour Management Procedure

These are based to comply with the ESS1, ESS2 and ESS4 (Environmental and Social Standard of the World Bank), in relation with the evaluation and level of the project site, implementation phase and the risks that it imposes, for the safety and health of workers, nearby communities and stakeholders. This activity and its codes of conduct are designed in phases and in joint and inclusive effort. All workers must adhere to this procedure and ensure to fulfil their contracted duties and assignments, obedience and respect to gender and ranks, care and well behaviour and good practice at work and with natural surroundings and biodiversity. A stand-alone LMP is developed for the Project.

8.8 Occupational Health and Safety Plan (OHSP)

During project implementation and with the implications that involve, creates the need of an Occupational Health and Safety, measures to be developed to prevent harm and ensure the health and safe working conditions and security to the personnel involved in the project activities. Occupational Health and Safety measures are reflected in the LMP.

Objective of Occupational Health and Safety Plan

This specific instrument is based on those mandates of ESS1 and ESS2, that establish the mechanism for the Occupational Health and Safety Plan (OHSP) and ensure that is in line with the World Bank Group EHS Guidelines and its specific Occupational Health and Safety (OHS), to ensure health and safety of workers during construction activities during a project implementation, with the purpose to avoid, minimize and mitigate those potential impacts that the activity could cause, and to avoid harm or any danger to peoples.

8.9 Chance Finds Procedures (CFP) at the project sites

This guidance follows the objectives of the Environmental and Social Standard of the WB: ESS1, ESS2, ESS5, ESS8. During project activities that involve remodelling, upgrading or constructing infrastructures, some of these actions can produce unexpected events such as findings of important scientific, cultural or social structures or artifacts that could be considered of national, cultural or historical values. Thus, a specific procedure must be implemented where responsibilities and actions must be in place to deal with these chance finds events. Most countries have specific legislation to comply with on these matters. A specific Chance Finds Clause must be included in all contracts for the project implementation activities. The basic procedure to follow in the Plan must be required: i) stop all activities in and nearby the findings, ii) inform the local pertinent national authority, iii) place barriers and security to guard and protect from vandalism, iv) await instructions and clearance by local pertinent authorities before proceeding and continuation of works. The basic content of a Chance Find Procedure should include:

- Objective for the Chance Finds Procedure
- Description of the Project and site characteristics
- Legal Frame
- Institutional frame
- Potential environmental and social impacts
- Values and compensation for losses
- Measures to protect and guard chance finds
- Permits arrangements
- Standard code of conducts for workers
- Implementation plan
- Budget and costs
- Stakeholders Consultation plan
- Grievance Redress Mechanism
- Follow up and evaluation
- Adaptive management arrangements

Objective of Chance Find Procedure

This specific instrument is based on those mandates of ESS8-WB, that establish the mechanism to follow in the case of a Chance Find event during a project implementation, with the purpose to avoid, minimize and mitigate those potential impacts that the activity could cause, and to avoid harm or any danger to people's cultural heritage.

8.10 Cultural Heritage Management Plan (CHMP)

The following guidelines are presented in order to elaborate the Cultural Heritage Management Plan (CHMP). These are conceived to be implemented during different phases of a project: pre-investment, design and construction phases. These guidelines follow the mandates of the Environmental and Social Standards (ESS-WB), ESS1, ESS2, ESS7, ESS8. Its applicability will be depending on; project site location and national legislation. This plan purpose is to avoid any negative impact or potential risks to the national, cultural or natural heritage of a nation were a project is implemented. The basic contents of a Cultural Heritage Management Plan should include:

- Objective for the Cultural Heritage Management Plan
- Description of the Project and site characteristics
- Legal Frame
- Institutional frame
- Potential environmental and social impacts
- Values and compensation for losses
- Measures to protect and guard National, Cultural and Natural Heritages
- Permits arrangements
- Standard code of conduct for workers
- Implementation plan
- Budget and costs
- Stakeholders Consultation plan
- Grievance Redress Mechanism
- Follow up and evaluation
- Adaptive management arrangements

Objective of Cultural Heritage Plan

This specific instrument is based on those mandates of ESS8-WB, that establish the mechanism to protect cultural heritage during project implementation, with the purpose to avoid, minimize and mitigate those potential impacts that the activity could cause, and to avoid harm or any danger to beliefs, knowledge and traditions.

8.11 Emergency Readiness Plan

The following guidelines are presented in order to elaborate an emergency readiness plan that could be implemented during the implementation process of project activities. These guidelines follow the mandates of ESS1, and its conditions will be dependent upon each activity phase and site. The risk and hazards to confront can be from natural or anthropic origin, quakes, hurricanes, contamination, fires; in all cases the plan is designed to avoid and prevent these events or in case of unavoidable events, to react and reduce its effect and harm in the community, workers and infrastructures. The basic contents of an Emergency Readiness Plan should include:

- Objective for the Emergency Readiness Plan
- Description of the Project and site characteristics
- Legal Frame
- Institutional frame
- Potential environmental and social impacts
- Values and compensation for losses
- Permits arrangements
- Standard code of conducts for workers
- Implementation plan
- Budget and costs
- Stakeholders Consultation plan
- Grievance Redressal Mechanism
- Follow up and evaluation
- Adaptive management arrangements

Objective of Emergency Readiness Plan

These objectives must be conceived to comply with ESS1, in regard to the evaluation, management and follow-up of risks and environmental impacts for the project phases. In the case of the Emergency Readiness Plan must be conceived since early stages of the project, pre-construction, construction and operational phases, in order to ensure minimal effects and damage by catastrophically and or accidental events.

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9. INSTITUTIONAL ARRANGEMENTS FOR IMPLEMENTING THE ENVIRONMENTAL AND SOCIAL FRAMEWORK

9.1 Implementing and Management Capacity

The implementation of this Environmental and Social Management Framework (ESMF) requires involvement of several stakeholders each with different roles and responsibilities to ensure sound environmental and social management throughout project implementation. The Project Implementation Unit (PIU) will be responsible for the implementation and monitoring of the ESMF and all other Environmental and Social Standards (ESS) instruments, including training and capacity building under the Project to local government, ministries and contractors. The PIU has dedicated staff for environmental and social issue management. The PIU is familiar with the World Bank safeguards policy requirements, having prepared and currently implementing the EALCRP Project ESMF and the relevant safeguards instruments, but it has not yet had experience with World Bank Projects under the ESF although it has received a number of trainings on the new ESF. An Environmental Specialist and a Social Specialist will support this PIU Capacity building will be important throughout project implementation to ensure that World Bank ESF-related instruments and national policies and regulations described in Section 3 are adhered to for the project.

9.2 Roles and Responsibilities

Implementation and monitoring of the ESMF, ESS instruments and the laws of Dominica will be the responsibility of PIU. Table 6 provides details on the roles and responsibilities for the ESMF.

Table 6: ESMF roles and responsibilities

Role/Position Title	Responsibilities
The Project Manager One Communications Specialist	<ul style="list-style-type: none"> Dissemination of project information pertaining to implementation of project activities.
One Environmental Specialist One Social Specialist	<ul style="list-style-type: none"> Manage and implement the Environmental and Social Framework (ESMF) for regional level project activities. Manage, monitor and enforce World Bank Environmental and Social Standards and the laws of the Commonwealth of Dominica pertaining to labour, health and safety, grievance redress mechanism, environmental and social performance throughout project implementation.

9.3 Supervision, Monitoring and Reporting of ESMF

The Project Leveraging Eco-Tourism for Biodiversity Protection (LEToBP) will be supervised by the PIU environmental and social staff, with the support of other relevant government ministries, agencies and departments, as needed.

Monitoring during project implementation provides information about key environmental and social aspects of the project, particularly the environmental and social impacts of the project and the effectiveness of mitigation measures. Environmental and social standards monitoring will occur as a regular periodic activity, and will include regular, compliance monitoring, process reviews/audits, reporting of outputs, quarterly monitoring as well as third party monitoring and environmental and social auditing carried out on the basis of the impacts, indicators and mitigation measures as prescribed in the ESMPs. This allows the Project to evaluate the success of mitigation as part of project supervision and allows corrective action to be taken when needed.

The Monitoring and Evaluation Specialist (M&E) at the PIU will coordinate monitoring activities and will (a) compile and consolidate data and verification documents; (b) ensure data quality; and (c) prepare and submit the reports to the Project Manager, Implementation Support Team (IST) and the World Bank on time. The Project Manager will designate either the Environmental Specialist and the Social Specialist to work alongside the M&E specialist in undertaking monitoring and reporting so that the standards are also reported on.

9.4 Budget and Resources

Table 7 below summarizes the estimated costs and schedules for the items associated with the implementation of the ESMF. These will be updated by the PIU and subject to clearance by the World Bank.

Table 7: ESMF Estimated Costs and Schedules

Item	Schedule	Cost/annual
Revise ESMF and ESMPs based on final design	First year of project implementation	US\$6000.00
Implement ESMF	Throughout project implementation	US\$12000.00
Recruit Environmental and Social ESF Specialist(s)	Full-time throughout project implementation (within 3 months of the Effective Date of the Project)	US\$36,000.00
Implement ESMPs	Throughout project implementation	US\$12000.00

The updating of the ESMPs will take place once details become available during the design phase. The costs associated with the implementation of the ESMPs are not likely to change because the nature of the project.

10.0 GRIEVANCE REDRESS MECHANISM (GRM)

10.1 Objective of the GRM

1. Establish a prompt, easy to understand, consistent and respectful mechanism to support the receiving, investigating and responding to complaints or grievances from community stakeholders;
2. Ensure proper documentation of complaints or grievances and any corrective actions taken;
3. Contribute to continuous improvement in performance of PIU through the analysis of trends and lessons learned.

10.2 Roles and Responsibilities

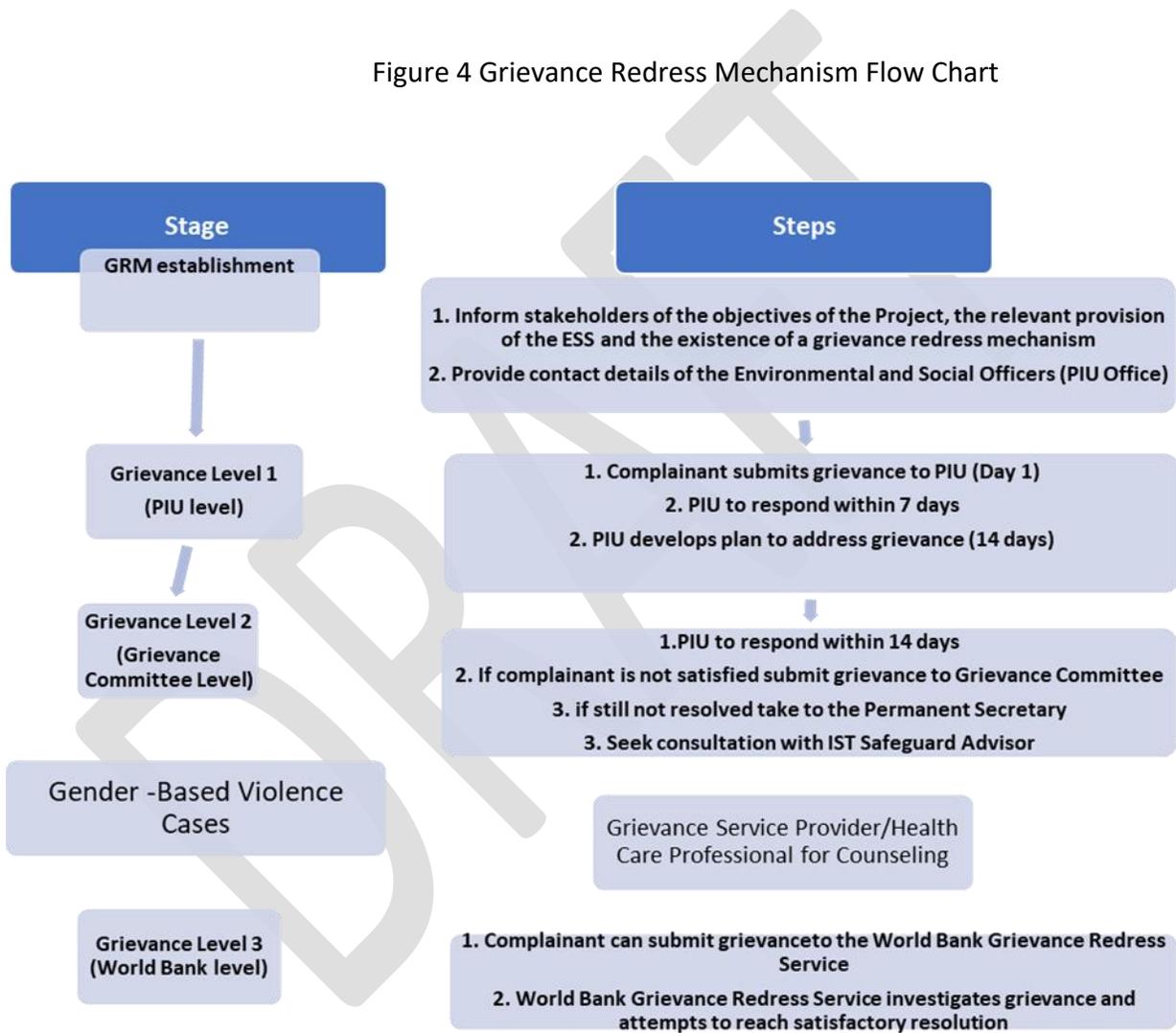
The environmental specialist and the social specialist will be responsible for implementing and monitoring the GRM. The GRM will enable the PIU to address any grievances against the Project. It must be noted that this GRM covers grievances that relate to the impacts that the project may have on people as presented in the Stakeholder Engagement Plan (SEP), Gender Assessment (GA), and Indigenous Peoples Planning Framework (IPPF)/Indigenous Peoples Plan (IPP). In the case of the IPPF/IPP, this GRM will (i) integrate in the Grievance Committee (GC) a Representative from the Kalinago Territory, to include the Kalinago Chief and Council, and (ii) will be culturally appropriate and accessible to affected Kalinago, and will take into account the availability of judicial recourse and customary dispute settlement mechanisms among them.

The Environmental Specialist and Social Specialist will be responsible for registering and tracking any complaints raised by individuals or groups. Complaints will be addressed and resolved through a three-level structure that may also involve the Grievance Committee, following the process described below. The PIU will maintain a single updated Data Base, managed by the Administrative Officer, to log all complaints and to track each from date received to date resolved and highlight how each case was investigated and resolved. The GRM of the Indigenous People Planning Framework specifically mentions the process in which grievances are resolved in the Kalinago Territory, which involves the Kalinago Chief and the Council involvement in a resolution. The GRM in the Labour Management Procedure also differs slightly in that unresolved grievances are taken to the Labour Commissioner and then to a Tribunal if still not resolved.

10.3 Grievance Redress Process

The Grievance Redress Mechanism (GRM) applies to all external and internal stakeholders of the operations during project implementation, including the rehabilitation of national trails and construction of eco-sites and monitoring activities.

Figure 4 Grievance Redress Mechanism Flow Chart



10.4 Grievance Reporting Channels

The GRM allows for complaints to be submitted to the PIU anonymously, online, phone, email, letter and in person:

- 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.

It is expected that there will be a normal response time of 7 days for each case; however high-level cases may require 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 semester or quarterly basis to the World Bank, and shall notify promptly (no later than 48 hours from taking notice of occurrence) the World Bank 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 ESF Specialists. 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.

Non Retaliation Statement

The 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.

10.4.1 Addressing Workers Grievance

Grievances that relate to all project workers will be handled by the Workers Grievance Redress Mechanism which is included as part of the project's Labour Management Procedures (LMP) that has been prepared.

10.4.2 Addressing Gender-Based Violence

The Social Specialist will be responsible for dealing with any gender-based violence (GBV) issues, should they arise. A list of GBV service providers will be kept available by the project. The GRM should assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

If a GBV related incident occurs, it will be reported through the GRM, as appropriate and keeping the survivor information confidential. Specifically, the GRM will only record the following information related to the GBV complaint:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- If, to the best of their knowledge, the perpetrator was associated with the project; and,
- If possible, the age and sex of the survivor.

Any cases of GBV brought through the GRM will be documented, but remain closed/sealed to maintain the confidentiality of the survivor. Here, the GRM will primarily serve to:

- Refer complainants to the GBV Services Provider; and
- Record the resolution of the complaint

This GRM also allows for complaints to be submitted to the PIU anonymously, online, by 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 for gender complaints will be linked to the Social Worker, Bureau of Gender Affairs, a GBV 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.

The GRM will also immediately notify both the Implementing Agency and the World Bank of any GBV complaints **WITH THE CONSENT OF THE SURVIVOR.**

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11.0 DISCLOSURE AND PUBLIC CONSULTATION

11.1 Disclosure

This draft ESMF document is being shared with the relevant stakeholders in order to inform them of project activities, identify any additional relevant concerns or issues and seek their feedback and views, which shall be considered and, where possible, incorporated, and thereby improve the quality and usefulness of the Final ESMF document. The ESMF contains measures to mitigate the potential risks and impacts that are associated with the project activities. Other environmental and social risk instruments for this Project such as Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), Gender Assessment (GA), Process Framework and Indigenous Peoples Planning Framework (IPPF)/Indigenous Peoples Plan (IPP) have also been prepared to address potential project related concerns and claims from workers and the general public. All these documents are being disclosed on the Government's website in draft form as part of the consultation process so Project stakeholders' feedback can be obtained. Where necessary, other methods of information disclosure will be used such as posters, booklets, newspapers, the internet, and community meetings.

The draft ESMF (and aforementioned E&S risk management instruments of the Project) will be revised to incorporate relevant stakeholder comments generated from consultation meetings. The final versions of the ESMF will be published on the Government of the Commonwealth of Dominica website at piu.agriculture.gov.dm

11.2 Public Consultation

Above all there must be community consultation before and throughout project implementation. Public Consultation is critical for this type of project - specially to gain community support and 'buy in'. During the preparation of this ESMF, the PIU held preliminary consultations with the relevant ministries and Parish and local government levels, project-affected groups bearing special consideration to the vulnerable groups (Kalinago, women, disabled peoples, etc), environmental and other NGOs, and both the Kalinago community (with a focus on Kalinago women) and indigenous peoples' council.

Public consultation meetings will be held to disseminate project information to the public as well as to receive their feedback. This enables project affected people and other stakeholders to participate in and contribute to the sub-project planning and implementation, and thereby help minimize adverse impacts and maximize benefits. The first of a series of public consultation meetings was held on March 16, 2021 at the Goodwill Parish Hall, with COVID 19 measures being fully observed (participants were socially distanced and wore face masks) and some participants joining via ZOOM.

Consultation meetings will be recorded and documented by the PIU, to capture comments from participating stakeholders. Consultations on the project are expected to involve both government as well as cooperatives and ecotourism groups, communities and will be supported by participatory processes. The preferred means of consultation is a public meeting (face to face) with power point presentations, posters and brochures. The presentation took the format where stakeholders can both listen, read and see photos of

what is being discussed. With regards to location and venue for meetings, they will be conducted in the Kalinago Territory and relevant communities that are likely to be impacted by the development of the national parks and WNT. See Annex 2.

Focus-group discussions (FGDs) and in-depth interviews with key stakeholders will be conducted within ecotourism communities and as well as with government (e.g., senior policymakers) and non-governmental stakeholders who have a stake in the sector. Participants in focus group discussions will be provided with short questionnaires. The information that is analyzed from these questionnaires will provide a more quantitative assessment and a generalized assessment related to individual views, perceptions, knowledge, attitudes and practices within the ecotourism sector and will support the various natural sites assessments that will need to be undertaken.

11.2.1 Stakeholder Engagement and Public Consultation COVID 19 Measures

The COVID pandemic has resulted in changes in stakeholder engagement and consultations methods, especially where active participation is required. The delivery method has been changed from unlimited face to face (no social distancing) meetings to virtual meetings and/or limited face-to-face meetings with social distancing. The Government of Dominica and the Ministry of Health, Wellness and New Health Investment's COVID Guidelines and Protocols have been adopted by the PIU and will be implemented throughout the project implementation, as required. The following COVID 19 measures will be used for consultations and stakeholder engagement activities that require active participation:

- Minimize direct interaction between project, ministries, agencies and beneficiaries.
- Stakeholder engagement events should start by going over social distancing orders and good hygienic practices.
- All consultation and stakeholder engagement meetings will require checking participants' temperature, sanitising participants, register name, address and contact number of participants and ensuring participants are 6 feet apart.
- Conduct smaller meetings and consultations in small-group sessions. If not permitted, conduct meetings through online channels (e.g., Microsoft teams, WebEx, zoom, skype).
- Diversify means of communication and online tools. Where possible, create dedicated online platforms and chatgroups, based on the type and category of stakeholders. Where online interaction is challenging, information can be disseminated through digital platforms (e.g., Facebook, Twitter, WhatsApp) and traditional means of communications (TV, newspaper, radio, phone calls).
- Specify how stakeholders can provide feedback when they do not have access to online channels or do not use them frequently.

Annex 1: ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST

Section A: Background information

ES Project investments Screening Checklist (Prototype) (Self-administered Project investments screening process by benefiting communities)

Section A: Background information

Name of Beneficiary.....	
Project investment Title.....	Project Location
Gender: Male Female Age.....	
Postal Address.....	
Contact Person.....	
Cell phone.....	
Activities/enterprises undertaken.....	
How was the Project investment chosen?	

Section B: Construction Issues

Will the Project investment:	Yes	No
Demolish existing structures and require disposal of construction materials?		
Demolish existing structures and require disposal of hazardous materials?		
Involve the generation of a significant amounts of solid and liquid waste?		
Construction work generate emissions to the atmosphere (dust, odours, fumes)?		
Construction work cause a noise nuisance due to the operation of heavy machinery and other on-site activities?		
Construction work produce significant amounts of runoff, change drainage patterns and/or erosion?		
Construction work affect traffic or public safety?		
Cause physical changes in topography and land use?		

If answers to any of the above is 'yes', please include an ESMP in Project investment implementation.

Section C: Environmental Issue

Will the Project investment:	YES	NO
Create a risk of increased soil erosion?		
Create a risk of increased deforestation?		
Create a risk of increasing any other soil degradation?		
Affect soil salinity and alkalinity?		
Divert the water resource from its natural course/location?		
Cause pollution of aquatic ecosystems by sedimentation and agro-chemicals, oil spillage, effluents, etc.?		
Introduce exotic/alien plants or animals?		
Involve drainage of wetlands or other permanently flooded areas?		
Cause poor water drainage and increase the risk of water-related		

diseases such as Dengue?		
Reduce the quantity of water for the downstream users?		
Result in the lowering of groundwater level or depletion of groundwater?		
Create waste that could adversely affect local soils, vegetation, rivers and streams or groundwater?		
Reduce various types of livestock production?		
Focus on biomass/bio-fuel energy generation?		

If answers to any of the above is 'yes', please include an ESMP in Project investment implementation.

Section D: Socioeconomic Issues & Community Health and Safety

Will the Project investment:	YES	NO
Displace people from their current settlement?		
Cause an influx of labour?		
Interfere with the normal health and safety of the worker/community?		
Reduce the employment opportunities for the surrounding communities?		
Reduce settlement (no further area allocated to settlements)?		
Reduce income for the local communities?		
Increase safety concerns due to introduction of the project?		
Increase exposure of the community to communicable diseases such as HIV/AIDS?		
Induce conflict?		
Introduce new practices and habits?		
Lead to child delinquency (school drop-outs, child abuse, child labour, etc.)?		
Lead to gender disparity or gender-based violence?		
Lead to poor diets?		
Lead to social evils (drug abuse, excessive alcohol consumption, crime, etc.)?		
Cause an increased exposure of the community to COVID-19?		

Section E: Natural Habitat

Will the Project investment:	YES	NO
Be located within environmentally sensitive areas (e.g., intact natural forests, mangroves, wetlands) or threatened species? NB: If the answer is yes, the sub-project should prepare a Natural Habitats Plan (see ESMP).		
Adversely affect environmentally sensitive areas or critical habitats – wetlands, woodlots, natural forests, rivers, protected areas including national parks, reserves or local sanctuaries, etc.)? NB: If the answer is yes, the sub-project should not proceed.		
Affect the indigenous biodiversity (flora and fauna)? NB: If the answer is yes, the sub-project should not proceed.		

Cause any loss or degradation of any natural habitats, either directly (through project works) or indirectly?		
NB: If the answer is yes, the sub-project should not proceed.		
Affect the aesthetic quality of the landscape?		
Reduce people's access to the pasture, water, public services or other resources that they depend on?		
Increase human-wildlife conflicts?		
Use irrigation system in its implementation?		

NB: If the answers to any of the above is 'yes', please include an ESMP/Natural Habitat Management Plan with Project investment application

Section F: Pesticides and Agriculture Chemicals

Will the Project investment:	YES	NO
Involve the use of pesticides or other agricultural chemicals, or increase existing use?		
Cause contamination of watercourses by chemicals and pesticides?		
Cause contamination of soil by agrochemicals and pesticides?		
Experience effluent and/or emissions discharge?		
Require scheduled chemical applications?		
Require chemical application even to areas distant away from the focus?		
Require chemical application to be done by vulnerable group (pregnant mothers, chemically allergic persons, elderly, etc.)?		

If the answer to the above is 'yes', please consult the IPMP that has been prepared for the project.

Section G: Vulnerable and Marginalized Groups

Will the Project investment:	YES	NO
Negatively affect the VMGs in the area who could benefit from the project? livelihoods of the VMGs in the project area?		
Affect vulnerable people and underserved groups (e.g., children, elderly poor pensioners, physically challenged, women, particularly head of households or widows, etc.)?		
Require temporary relocation for a vulnerable population affected (children, physically challenged, elderly, minority group etc.)?		

If the answer to any of the above is 'yes', please consult the IPP that has been prepared for the project.

Section H: Land Acquisition and Access to Resources

Will the Project investment:	YES	NO
Require acquisition of land (public or private) (temporarily or Permanently) for its development?		
Use land that is currently occupied or regularly used for productive purposes (e.g. gardening, farming, pasture, fishing locations, forests)?		
Displace individuals, families or businesses?		
Result in temporary or permanent loss of crops, fruit trees and Pasture land?		
Adversely affect small communal cultural property such as funeral and burial sites, or sacred groves?		
Result in involuntary restriction of access by people to legally designated parks and protected areas?		
Be on monoculture cropping?		

If the answer to any of the above is 'yes', please consult the mitigation measures in the ESMF and, if need be, adopt the ARAP guidelines.

Section I: Proposed action

Summarize the above: Based on the above screening checklist results and the risk identified an ESMP will be developed.	(ii) Guidance
All the above answers are 'No'	<ul style="list-style-type: none"> If all the above answers are 'No', there is no need for further action;
There is at least one 'Yes'	<ul style="list-style-type: none"> If there is at least one 'Yes', please describe your recommended course of action (see below).

(iii) Recommended Course of Action

Annex 2 Outcome of Stakeholder Consultation

Leveraging Ecotourism for Biodiversity Protection GEF-7 Project Stakeholder Consultation

GoodWill Parish Hall

March 16th, 2021

Outcome of Stakeholders Consultation:

1. Increase Arrival Revenue from both Cruise Line Passengers and Eco Tourist at less Popular Sites

Stakeholders (Forestry and Wildlife Division Officer) recognised the efforts of Government to promote and support the development of tourism-related services and businesses through the implementation of several programmes including the Eco-Tourism Development Programme targeting Rural Communities. Both mass tourism from Cruise Ships and niche tourism should be promoted since, mass tourism is seasonal of six months from November to April, while Niche Tourism Sector Development Programme can be sustainable. Participants echoed the desperate need to have additional sites within the radius of Roseau to balance the 80% revenue derived from the two most popular sites of the Emerald Pool and the Trafalgar Falls, and ten sites generating 20% of arrival revenue. The challenge to increase revenue from other sites within the Roseau Valley such as the Fresh Water Lake, Middleham Falls and Wotton Waven mineral springs.

Use of surveys or on-line questionnaires administered by Discover Dominica Authority (DDA) on attending Cruise Line Trade shows is an area worth investigating to enhance the economic status of the ten other sites generating 20% of arrival revenue from cruise lines. The survey or questionnaire will determine areas of investment required to Upgrade existing Eco-tourism Sites in Rural Communities within the radius of Emerald Pool and Trafalgar fall to increase the amount of passengers all promoting and supporting Biodiversity. Use of Tour Operators by DDA to execute surveys to determine consumer needs should be encouraged by DDA

2. Improve Coordination with major stakeholders in the Tourism Sector

The Community Tourism Officer, from Discover Dominica Authority expressed concerns of the non-existent coordination between the Ministry of Tourism and the Ministry of Environment including the Forestry Unit. Coordination mechanism are urgently required if non-existent, and if coordination between Tourism and Forestry exist however, non-operational, the composition, roles and responsibilities with frequency of meetings should be developed and clearly articulated in a Coordinating Mechanism. The level of coordination includes sharing information and planning should be elevated to collaboration additionally including sharing of resources within the shortest possible time.

3. Promotion of Health and Wellness

Community groups including the Marigot Community Tourism; Dominica Association of Local Government (DALGA) and Community group located in Segment 13/14 all requested technical

assistance to promote and support the production and marketing of Organic Foods; Medicinal teas and the use of Mineral Spring Water. Innovative systems to recycle water and reduce on the Carbon foot print should be encouraged by supporting investment in Recycling of water and use of Solar for electricity and WIFI access at key WNT segments.

4. Promotion of Community Tours

Taxi Association and Tour Operators expressed concerns on the use of site passes and the cost benefit from community packages within 3 – 4 hours range of engagement. DMA also expressed concerns on the limited use of rural communities in promoting Ecotourism including Historical or Cultural Tourism. Inventory of Goods and Services available from Rural communities and the partners existing to coordinate and collaborate in execution in the provision of these community services and goods. San Sauveur was given as an example to determine availability of local cuisine; local experiences; aligned with promotion to enhance the demand including conspicuous signage and aggressive niche marketing.

5. Increase use of Social Indicators in GEF Project

Suggestion from the Dominica State College on measuring social indicators: Environmental Officer in collaboration with M&E Officer; IST Socials Specialist and the World Bank Technical Support ESS Team to develop and institutionalise the use of SMART Social Standards Indicators in monitoring and evaluating the success of the GEF project. Once indicators developed, pursue the use of the Dominica State College to collect and aggregate the Data recommended to be collected and aggregated, then verified, analysed and presented by the PIU.

6. Safety aspects of Hiking

Stakeholders, Dwivaewez Hiking Club directly involved in hiking expressed the following concerns:

- Urgent need to develop and execute a public sensitization campaign on the risks and risk mitigation measures recommended for safe hiking
- Need to register Hiking groups and maintain open information and communication channels
- Time of year hiking should be promoted and supported
- Carrying capacity determined and published for key WNT segments based on traffic flows
- Promote the use of appropriate mandatory PPEs at all times
- Disposal systems clearly demarcated and penalties imposed for non-compliance