

Environmental and Social Management Plan (ESMP)

September 18th 2024



Revision Record

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Chapter 1. Introduction and the Context of the ESMP

1.1 Introduction

The Government of the Commonwealth of Dominica (GoCD) secured funds from the World Bank to restore the Agricultural, Fisheries and Forestry sectors that was destroyed by the passage of Hurricane Maria on September 18, 2017. The Project Implementation Unit was established within the Ministry of Blue and Green Economy, Agriculture and National Food Security to manage the affairs of the Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP). The Ministry of Environmental, Rural Modernization and Kalinago Upliftment, specifically the Forestry, Wildlife and Parks Division are the primary beneficiaries of the Forestry component of the Project. The Forestry Division, is aimed at reducing the vulnerability to natural hazards impacts on the WNT through investment in retrofitting and rehabilitating the infrastructure and amenities, as well as improve data for the marketing, maintenance and management of the WNT.

1.2 Waitukubuli National Trail (WNT)

The Waitukubuli National Trail (WNT) was developed through special support of the Waitukubuli Ecological Foundation, financial support of the European Union, the Regional Council of Martinique and the Government of the Commonwealth of Dominica. The Trail Management Unit of the Forestry, Wildlife and Parks Division within the Ministry of Environment, Rural Modernization and Kalinago Upliftment is the main custodian of the WNT, overseeing its management and maintenance. The trail showcases the best of Dominica – culture/ heritage, local lifestyles and the islands rugged terrain and wild nature – rivers, waterfalls, mountains, exotic gorges and rain-forest, all through its fourteen (14) segments from the South of the Island extending to the North.

The Waitukubuli National Trail (WNT) and Dominica's three national parks are a cornerstone for Dominica's eco-tourism potential. 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. Dominica is also has forest reserves to include the Central and Northern Forest ranges and the Soufriere, Scott Head Marine Reserves

The WNT is the first Caribbean long-distance hiking trail. 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. The trail crosses the Kalinago Territory at segment 6 from Hatten Garden to First Camp.

The trail starts at Scott's Head, in the southern point of the island, and ends at the northern tip at the Cabrits National Park.

The trail runs through coastal, rainforest and elfin forests. Some sections are rugged and volcanic, others feature deep gorges, natural hot springs and a Boiling Lake. WNT also mounts the island's volcanic peaks, including 1,447m Morne Diablotins, Dominica's highest peak and the second highest in the Lesser Antilles.

1.3 ESMF and ESMP for the Project

The established Environmental and Social Management Framework (ESMF) for the project requires all project related activities, including sub-project activities to be reviewed and assessed to ensure that environmental and social impacts associated with their implementation throughout the project's life cycle are avoided, mitigated, or compensated. The Environmental and Social Management Plan (ESMP) is one of the safeguards instruments used to address the environmental and social impacts and risks of projects. Based on the screening conducted, an Environmental and Social Management Plan (ESMP) is required to identify and appropriately manage environmental, social, health and safety impacts and risks. This ESMP has been prepared to provide guidance and mitigation measures to the implementing entities (Local Government Authorities, Division of Forestry Parks and Wildlife and contractors/sub-contractors) to ensure that the Rehabilitation of the Waitukubuli National Trail is compliant with national and regional environmental regulations, the World Bank safeguards policies, the ESMF created for the project,¹ and consistent with international best practices. .

This ESMP will be disclosed on the EALCRP website after World Bank's approval, and the records of the disclosure will be documented and recorded. This ESMP for the rehabilitation of the Waitukubuli National Trail can be accessed at EALCRP website <http://www.piu.agriculture.gov.dm/>.

¹ The Environmental and Social Management Framework (ESMF) for the EALCRP in Dominica can be found at: [dominica EALCRP ESMF.pdf \(agriculture.gov.dm\)](http://www.piu.agriculture.gov.dm/dominica_EALCRP_ESMF.pdf)

1.4 Linkages with GEF 7 Ecotourism Project

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 Fisheries.

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 Protected Areas (Pas) in Dominica needs to identify potential sites of interest and create short value-chains benefiting the local communities.

The specific 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). There's a synergy between the two projects as the rehabilitation of the National Trail the GEF Tourism Project deals with a more marketing approach and a management plan.

Chapter 2. Project Description

2.1 National Location



FUNDED BY THE EUROPEAN UNION AND THE GOVERNMENT OF THE COMMONWEALTH OF DOMINICA AND IMPLEMENTED IN PARTNERSHIP WITH THE REGIONAL COUNCIL OF MARTINIQUE

2.2 Trail Segment

* The Duration range gives an estimated time range for less experienced to more experienced hike durations. It should be noted that this and the difficulty rating can change based on the direction of the hike.

Segment	Trail	Distance	Time/Duration Range*	Difficulty Rating	Areas of Interest
1	Scotts Head to Soufriere Estate	7 km / 4.4 miles	4 – 5 hrs	Moderate - Difficult	View of Cachacrou isthmus, Soufriere Bay, Marine Reserve, Bois Cotlette estate, Crabier Plateau, Toulou Valley and Martinique (neighbouring French island)
2	Soufriere Estate to Bellevue Chopin	12 km / 7.5 miles	5 - 7 hrs	Difficult	Soufriere sulphur spring and view of both Atlantic Ocean and the Caribbean Sea.
3	Bellevue Chopin to Wotten Waven	14.9 km / 9.3 miles	6 - 8 hrs	Difficult	View of the Morne Trois Piton National Park a UNESCO World Heritage Site); Old slave route at Bellevue Chopin; flower gardens at Giraudel
4	Wotten Waven to Pont Casse	17 km / 10.6 miles	6 – 7 hrs	Moderate	Hot Springs and traversing through the Morne Trois Piton National Park
5	Pont Casse to Castle Bruce	11 km / 6.8 miles	6 - 8 hrs	Easy - Moderate	Banana, Plantation, Emerald pool, spring bridge, Small Waterfall, Jaco Cave, Kalinago Trace
6	Castle Bruce to Hatton Garden	15 km / 9.3 miles	7 – 8 hrs	Moderate - Difficult	Kalinago Territory; L'escalier Tete Chien Canoe building, Barana Aute, Isulukati Falls, pagua Rock, Old Kalinago Catholic Church, Site of the Kalinago Wars Cassava bread making; Horseback ridge and Concorde Valley; Kalinago Craft making
7	Hatton Garden to First Camp	9 km / 5.6 miles	6 - 7 hrs	Moderate - Difficult	Farm Lands; Bird watching tower; Congorie Hole
8	First Camp to Petite Macoucherie	10 km / 6.2 miles	9 - 11 hrs	Very Difficult	Wildlife viewing i.e National Bird (Sisserou Parrot, agouti and the Jaco); primordial rainforest, Mosquito Mountain, Forst Camp
9	Petite Macoucherie to Colihaut Heights	9.8 km / 6 miles	8 - 10 hrs	Very Difficult	Mountain Whistler, Gommier Tree, Chatanyee Tree, Jaco Parrot, Sisserou; Kachibona Lake
10	Colihaut Heights to Syndicate	6.4 km / 4 miles	3 - 4 hrs	Easy	Milton falls, view of the west coast parrots; Kachibona Lake, Morne Diablotin
11	Syndicate to Borne	13.2 km / 8.7 miles	7 - 8 hrs	Difficult	Mountain Whistler, Gommier Tree, Chatanyee Tree, Jaco Parrot, Sisserou Parrot; Syndicate Nature Trail; Syndicate Waterfalls (off trail); rainforests, farmlands
12	Borne to Penville (Delaford)	9.5 km / 5.9 miles	7 – 8 hrs	Moderate to Difficult	View of Brandy Falls, site where Pirates of the Caribbean 2 was filmed, and Atlantic Ocean
13	Penville to Capuchin	9.5 km / 5.9 miles	2 - 4 hrs	Easy - Moderate	View of Marie Gallante, Les Saintes and Guadeloupe. Historic site- once used by the Indigenous Arawaks, Cannor Heritage Park

14	Capuchin to Cabrits National Park	10.8 km / 6.7 miles	4 - 5 hrs	Moderate	Cabrits National Park, Bella Hall Beach, Bay Oil Processing Plant
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1.3 Objectives of Restoration

The project intends to restore proper access as well as public and community forest ecosystem services lost during the passage of hurricane Maria and build long-term capacity for comprehensive forest resilience planning. The project will rehabilitate or reconstruct 130 km of walking trails, to include pedestrian bridges, crossings, gazebos, benches, tables, install rope for ascending and descending steep slopes. The project will rebuild and upgrade government infrastructure that supports the maintenance, promotion, and management of the forests and trails to enable monitoring, research, public outreach, and emergency services. The Project will place focus on rehabilitating segments 4, 11 and 13 as pilot projects.

1.3.1 Rehabilitation of WNT

- Repair trail bed to include expansion in area where necessary, clearing of bushes, placement of rock or logs for increase traction whilst traversing, building of steps and providing drainage to control excess water and reduce soil erosion.
- Building and placement of directional signs and trail markings on trees, rocks and other permanent features see photo #3.
- Infrastructure and Amenities to include the construction of bridges, benches, tables, railings, picnic shelters and a tourism reception facility, including toilets.
- Construction of pedestrian bridges, water crossings, gazebos, lookout points. and viewing platforms
- Installation of Warning/Safety signs
- Provide an advance radio and telephone communication system for the Forestry Unit of the Ministry of Environment with the capabilities for search and rescue operations across all segments of the trail
- Maintenance Plans

1.3.1.2 Segment 4

Segment 4 begins in the village of Wotten waven and end up at Point Case, it is 11.9 km. Based on the segment assessment conducted there are specific intervention to be undertaken to include but not limited to: Drainage and placement of logs in waterlogged areas; erection of steps where slopes are more than 45 degrees and placement of ropes where roots covers the trail bed, this allows for the safe descending and ascending the gorges and replacement of bridge, replacement of gazebo, benches, picnic tables and replacement of several warning, directional and informational signs.

Photo # 1. Stagnant water- drainage required



Photo # 2. Bridge to be repaired



Photo # 3. Trail to be reroute around big trees



Photo # 4. Ropes used to descend gorge



Photo # 5. Safety sign to be replace



photo # 6. Gazebo to be replaced



1.3.1.3 Segments 11

Segment 11 is 13.2km and starts at Syndicate and end up at Borne. The main works for this segment includes: clearing of bushes /vegetative management of razor grass and thorn bushes; placement of ropes for climbing up and down the steep gorges; building of steps, replacement of spring bridge over the Picard River at Ross Castle estate.

Photo #.7 View of The Cabrits



Photo #8. Gazebo at Ross Castle to be repaired



Photo # 9. spring bridge to be renovated



Photo # 10. Razor grass management



1.3.1.4 Segments 13

Segment 13 is 6.8km and runs from the village of Penville to Canna Heritage Park in Capuchin. The main works on this segment is the expansion of the trail bed and stabilization of the trail edge. Midway through the trail there lies the remains of an ancient village known as Grand Fond where a gazebo will be built and the historical sign boards repaired. This segment portrays beautiful view of the Islands of Guadeloupe, Les Saintes and Marie Galante.

Photo # 11. View of Les Saintes, and Marie Galante



Photo # 12. Trail stabilization and expansion required



Photo # 13. Ruins of Grand Fond Settlement



Chapter 3. The Legal and Administrative Framework

The ESMP was prepared against the background of ensuring the WNT renovation activities are managed, mitigated and compliant with the relevant laws of Dominica and the World Bank Environmental and Social Safeguards Policies and a Environmental, Health and Safety Guidelines. A comprehensive review of the policy, regulatory and legal framework in Dominica is described within the general ESMF for the Emergency Agricultural Livelihoods and Climate Resilience. This ESMP attempts to address the most significant environmental and social impacts and risks (including health and safety) associated with the rehabilitation of the WNT, such as destruction of flora and fauna, soil erosion, water pollution and encroachment on private property etc.

3.1 Relevant National Laws and Policies for the project

3.1.1 Forestry and Wildlife Act No.12(1976) Revised

This Act provides for the protection, conservation and management of wild animals to include, fresh water fishes and amphibians, crustaceans and reptiles, and for the purpose connected therewith.

Forest reserve means any area declared by the President by Notice in the Gazette to be a forest reserve.

3.1.2 Forest Act (1990)

This Act make provision for the conservation and control of state-owned forests. This is critical especially where forest land (reserves) is bordering with agricultural lands.

3.1.3 Water and Sewage Act (1989)

This Act conserves and preserves water and the protection of the catchment areas. This Acts stipulated that water management is vested in the Dominica Water and Sewage Company (DOWASCO). The Forestry Wildlife and National Parks Division is the legal entity responsible for the day to day management of the island's watersheds and catchment areas.

3.1.4 National Parks and Protected Areas Act, No. 12 of 1975, Chapter 60:0 (1990)

An Act respecting national parks and protected areas. National Parks are all lands in the parks and all lands set apart as protected areas shall constitute the national parks system and are hereby vested in the State and dedicated to the people of Dominica for their benefit, education and enjoyment. Notwithstanding any other Act, the lands within the national park system shall be maintained and made use of so as to leave them unimpaired for the enjoyment of future generations.

3.1.5 Land and Surveys Division

The responsibilities of all State lands are vested in the Lands and Surveys Division.-This includes the allocation and protection of Government lands.

The Division conducts of all public surveys and provision of land surveying and land information services for all government agencies/divisions. It is the legal custodian of all Government land records.

As the national mapping agency, the Division is responsible for updating all maps and map sheets of the island.

The Division also collaborates with other government agencies/divisions in providing advice and guidance on land related issues for developmental projects.

3.1.6 State Lands Ordinance/ Act

An ACT relating to the administration and disposal of State lands
State lands" mean all lands within the State other than forest reserves within the meaning of the Forest Act vested in the State or vested in the President for the public uses of the State and shall include all lands which have been escheated to the State or may hereafter be otherwise acquired by the State .

3.1.7 Land Survey Act

AN ACT to make provision for the licensing and professional conduct of land surveyors in the State, for regulating the execution of land surveys and for matters incidental and connected therewith.

3.1.8 Land Acquisition Act

An ACT to authorize the acquisition of land for public purposes by government.

3.2 World Bank Social and Environmental Safeguards

3.2.1 Safeguard Policies

The World Bank (WB) has developed Safeguard Policies that guide the development of projects including the EALCRP. Accordingly, the ESMF was prepared for the EALCRP as a guidance document, and currently the ESMP has been prepared for this project. World Bank Safeguards triggered by rehabilitation of the WNT sub-project cover aspects such as assessment and management of environmental and social risks and impacts, soil erosion, pollution prevention, disturbance to flora and fauna, management of the natural habitat, and workers' and community health and safety. For a thorough discussion of these, please refer to the ESMF document (<http://piu.agriculture.gov.dm/publications>) or the WB website (<https://www.worldbank.org/en/projects-operations/environmental-and-social-policies>).

3.2.2 EHS Guidelines

Environmental, Health and Safety guidelines have also been prepared by the WB. There are general guidelines that cover most activities related to construction projects involving the rehabilitation of trails. Some parts of these general guidelines are applicable to the project, particularly such aspects as soil erosion and destruction of fauna and flora and workers' health and safety. For more information refer to the EHS Guidelines on the WB website.²

²https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

Chapter 4. Potential Environmental and Social Impacts

The initial works of the rehabilitation of the WNT is to provide access by clearing of the trail bed to include removal of fallen trees/logs blocking the trail, clearing of landslides using shovel, pick axe and spade. In terms of vegetation management: pruning of overhanging branches, clearing trail using brush cutters or cutlasses. Brush cutter for clearing heavy shrubs and chainsaw for pruning of heavy vegetation, however, their negative impacts will be minimal.

Trail bed rehabilitation will also include drainage, building steps on steep slopes and construction of cross drains and spring bridges.

There are numerous benefits that can be accrued from the above activities to the WNT and can significantly improve the livelihood of the local communities and the Nation as a whole. Some of these benefits include: improvement of the trail path allowing for easier access; increase the number of amenities along the trail and increase the quality and value of the hike; create employment and increased income more particularly in rural communities and towards alleviation of poverty; promoting health and wellness among citizens, improving quality of life/overall social well-being; encouraging collective responsibility for environmental conservation; promote cultural and heritage development; expansion of the tourism industry; allow for business investments and economic diversification and stimulating private sector growth and development.

Notwithstanding all the positive benefits from the rehabilitation of the WNT, there are environmental and social risks and impacts that may occur, and as of such, mitigation measures must be put in place to avoid, reduce, or compensate for potential damages.

4.1 Potential Environmental Impacts at Trail Rehabilitation Phase

Soil removal and vegetation clearance for the rehabilitation of trails and eco-sties (e.g. gazebos, viewing platform, 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 caused by the improper drainage and disposal of construction debris and other materials. Disturbance of wildlife habitat and loss of ecological species may occur. Nuisance relating to noise during the trail repair works and construction activities whilst chainsaw is being used.

4.1.2 Disturbance of Fauna

4.1.2.1 Disturbance to microhabitats

Along the trail there are several microhabitats: decomposing logs, ant nests, rocks and lichen that may be impacted during the rehabilitation of the WNT. These small areas include biotic and abiotic ecosystems that provides food and shelter to both aquatic and terrestrial species along and adjacent to the trail rehabilitation route. These microhabitats are very sensitive and can be easily disturbed or removed without being realized by contractors.

4.1.2.2 Disturbance to Aquatic life

Most of the rehabilitation will be done way from streams and water ways, except where there are stream crossings and the erection of a small pedestrian spring bridges where necessary. However, the construction of these water crossings may cause disturbances in the river bed

which has the potential to negatively impact the feeding and hiding spaces of freshwater fishes such as crayfish, crabs, *Gobies (Awaous banana)* , *Gobiesox cephalus* and Spotted algae-eating goby (*Sicydium punctatum*).

4.1.2.3. Disturbance of wildlife habitat

There are several species of wildlife, mostly birds that live in close proximity to or even along the national trail. These include, but are not limited to, the parrots: red neck or Jaco Amazona arusiaca) and the national bird, the Sisserou Parrot (Amazona Imperalis). The Rufous-throated Solitaire (Myadestes genibarbis) is a bird of the higher-elevation forest and can be found primarily in segments 9, 10 and 11. Other birds that can be found in the forest canopy include Lesser Antillean Flycatcher, Little Green Heron, Purple-throated Carib and the red legged thrush. The opossum and owl are nocturnal and would not be impacted by trail restoration works. The Red-rumped Agouti, (*Dasyprocta leporine*) is a shy mammal and will easily move away from any human activity.

Photo # 14. Land crab

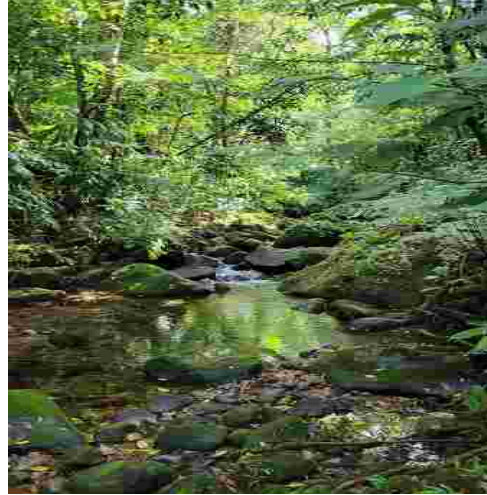


Photo # 15. Boa constrictor



4.1.3 Impacts on Surface Water

Most of trail rehabilitation works will be done in the forested area, most of which is the source of our water supply. It is therefore important that the movement of soil be managed properly so as not to pollute our water ways.



Photo# 16. Fresh water stream

4.2 Potential Social Impacts

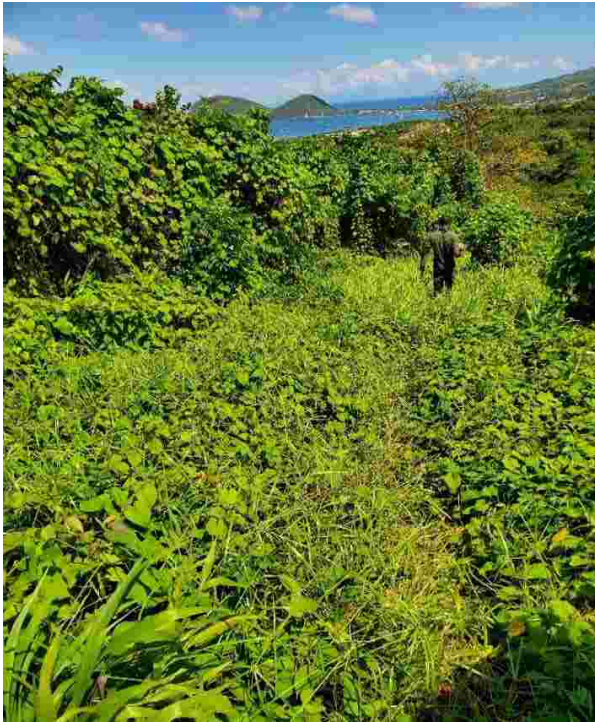
The impacts are expected to be site-specific (e.g., trails), minimal, short-term and reversible. Social impacts may include inequitable distribution of project benefits and social exclusion whose effect would produce a disproportionate impact on the most vulnerable and disadvantaged to include; the poor, women, youth, the unemployed people with disabilities and the Kalinago indigenous community.

4.2.1. Encroachment on private lands

The entire trail is a right of way as it was once used to connect communities and villages in the past. Approximately 21% of the trail either passes or crosses through private lands, therefore it is necessary to provide mitigation measures through the development of agreements between land owners and the Ministry of Environment, Rural Modernisation and Kalinago Upliftment. (see annex 2)

Note that the project will not be rebuilding new trails, but minor rehabilitation to the existing trail. There will be no rerouting of the trail onto private lands for the selected priority segments. Traditionally, private land owners have allowed easement of WNT through their lands. For the purpose of rehabilitation works on Segment 4 agreements will be developed for four landowners; on Segment 11, seven agreements will be developed and on Segment 13, four easement agreements will be developed for landowners where their land traverses the trail.

Photo # 17 & 18. A portion of segments 11 traversing through private farm lands



Half way along segments 11 in an area known as Ross Castle Estate, the trail traverses' private lands. See photo above.

On the last section of segments 13, just about 1000ft of before it enters into Canna Heritage Park before the village Capuchin is an area of the trail that is privately owned. Though, this portion of the trail does not have any rehabilitation works to be done. The project will seek to inform the owner of works on this segment. See annex 2 for easement form.

4.2.2 Workers' Health and Safety

Contractors and their workers will be working in remote areas away from medical facilities or services as of such they must be trained in Basic First Aid Treatment and Emergency training so that they may be better equipped if the situation arises for the use of such skills. They will be using brush cutters and chainsaws and must practice safe working procedures, including the use of appropriate personal protective equipment (PPE). Workers could be exposed to a number of hazards, which present risks of illness, injury or death.

Contractors will be responsible for rebuilding or renovating pedestrian bridges most of which are over deep gorges, therefore workers must be equipped with gears required when working at heights.

4.2.3 Forced Labour

The Project will not use forced labour and/or child labour. The Contractor shall have in place, a grievance redress mechanism for workers to raise workplace concerns and grievances including instances of forced labour. If the Contractor is unable to develop and implement a grievance redress mechanism (GRM), workers will be directed to use the EALCRP PIU's GRM to register complaints, issues or concerns.

4.2.4 Child Labour

No person under the age of 18 years will be employed or engaged in any project activity. The contractor will enforce the Code of Conduct (see Annex 4) to prevent child labour; i.e., any person, 18 years or below, forced labour; persons working against their own free will, avoid discrimination especially of vulnerable groups and allow employees to raise workers concerns.

4.2.5 Gender-Based Violence (GBV)

This project does not foresee and is not a high-risk project for GBV and sexual exploitation and sexual abuse/sexual harassment (SEA/SH) cases. Due to the environment in which works will be occurring the risk of sexual related violence will be increased. Firstly, the area of construction will be away from the community and in the forested zone, making the situation for sexual advance high. Secondly, contractors working in these areas may encounter females in remote communities, most of whom may be marginalized and vulnerable and can be easily exploited.

Some cases such as SEA/SH are sensitive and may not be reported due to the risks of stigmatization, rejection and reprisals against survivors. This creates and reinforces a culture of silence and survivors may be unwilling to approach the authorities. Therefore, the contractor will need to put in place multiple channels for mitigating and registering complaints in a safe and confidential manner.

The Contractor should also include in the code of conduct (annex 4) measures to address sexual exploitation and abuse and sexual harassment incidents that may occur in the work place. 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. 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.

4.2.6 Disturbance or damage to cultural heritage

There is an area of an old French coffee estate along segments 13 known as Grand Fond. It was also one of the last Kalinago Villages on the North Coast. Contractors must not remove any ruins to include rock etc during trail works.

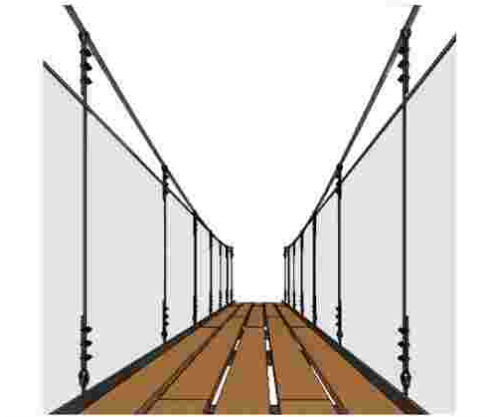
Photos 19 & 20. Ruins of the ancient settlement of Grand Fond

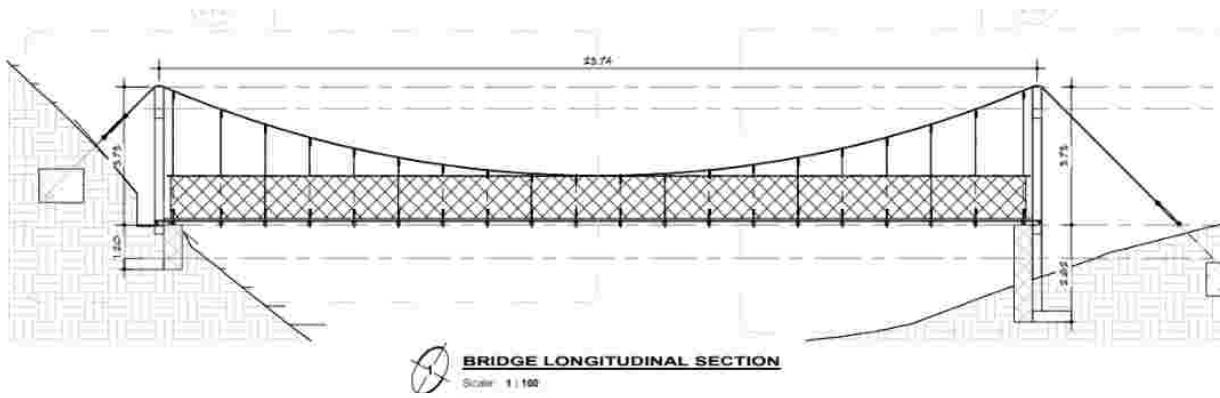


4.3 Construction Phase

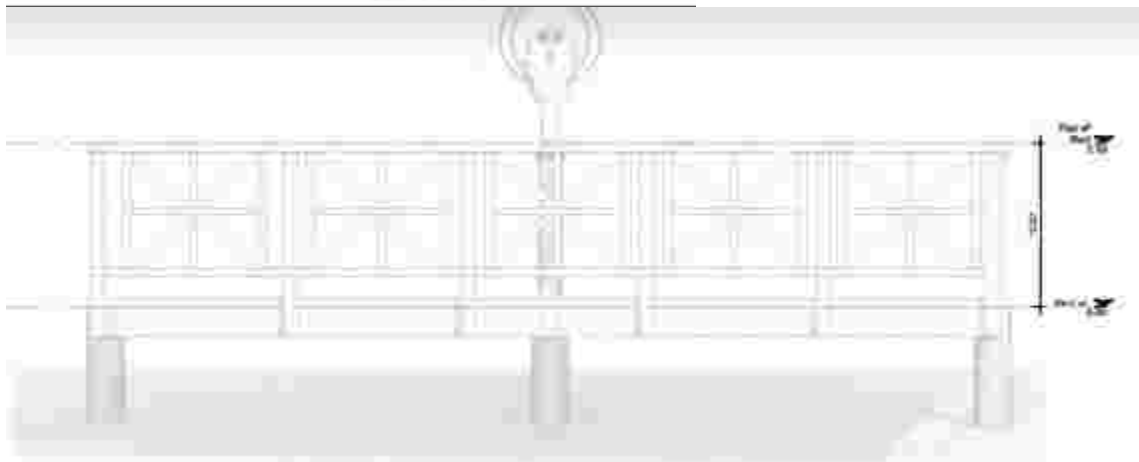
Rehabilitation of the WNT include minor construction works such as the building of foot bridges for the water crossing, installation of railings, construction of gazebos and viewing platforms. Contractors are expected to use material and tools that will not cause any harm to this sensitive environment nor noise that will disturb the fauna. Most of the motorized tools used will be powered by battery, fuel gas or generator powered equipment.

Design 1. Foot spring bridge

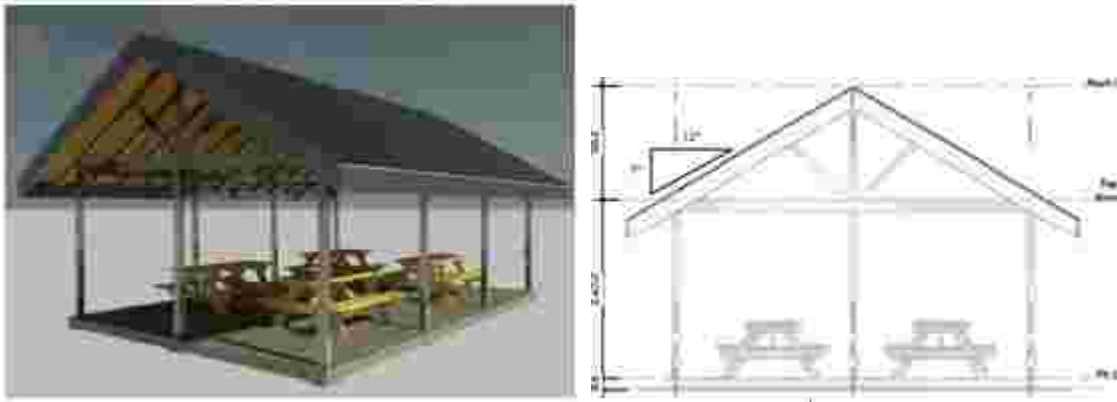




Design 2. Viewing platforms



Design 3. Picnic Shelter



4.3.1 Land and Noise Pollution

Land pollution, though possess minimal risk may occur when contractors dispose of scrap construction material and lunch packages. Due to the numerous waterways that traverses the trail it is important not to allow these waste materials to end up in the streams creating additional contamination to aquatic life. Most of the motorized equipment to be used for construction of gazebos and wooden bridges will be battery operated and those used for trail works will be fuel based such as chainsaws and brush cutters emitting small amounts of pollutants. Wildlife will normally move away from the noise of construction of gazebo, bridges etc. while these machines are being operated. A few of the motorized equipment to include chainsaws and brush cutters use fuel; two-stroke oil mixtures or gasoline, which may spill during mixing or refilling. Though the spill may be minor in nature extreme care must be taken to avoid spillage and therefore mixing must be done away from waterways and soil must be protected by a tarp, a plastic or metal bin or similar protection, and soiled cloths carried away from the worksite for disposal.

4.3.2 Solid Waste Management

Waste generated from the rehabilitation of the national trail will be sorted out based on their ability to be decomposed or those that are inorganic in nature. Organic waste will include wood scraps used from the construction of wooden rails and bridges, etc

4.3.3 Forced Labour

The Project will not use forced labour and/or child labour. The Contractor shall have in place, a grievance redress mechanism for workers to raise workplace concerns and grievances including instances of forced labour. If the Contractor is unable to develop and implement a grievance redress mechanism (GRM), workers will be directed to use the EALCRP PIU's GRM to register complaints, issues or concerns.

4.3.4 Child Labour

No person under the age of 18 years will be employed or engaged in any project activity. The contractor will enforce Code of Conduct (see Annex 4) to prevent child labour; i.e., any person,

18 years or below, forced labour; persons working against their own free will, avoid discrimination especially of vulnerable groups and allow employees to raise workers concerns.

4.3.5 Gender- Based Violence

This project does not foresee and is not at high risk project for SEA/SH cases. However, some cases such as that of sexual exploitation and sexual abuse/ sexual harassment (SEA/SH) are sensitive and may not be reported due to the risks of stigmatization, rejection and reprisals against survivors. This creates and reinforces a culture of silence and survivors may be unwilling to approach the authorities. Therefore, the contractor will need to put in place multiple channels for mitigating and registering complaints in a safe and confidential manner.

The Contractor should also include in the code of conduct (annex 4) measures to address sexual exploitation and abuse and sexual harassment incidents that may occur in the work place.

4.3.6 Disability Exclusion or Discrimination

The Project is keen to include people with disabilities into design and implementation of the project activities and prevent discrimination against disabled people. Discrimination on the basis of disability means creating a distinction, exclusion, or restriction which has the purpose or effect of impairing or excluding a person with disability from being on an equal basis with others, thereby potentially enhancing the negative impacts of the project or limiting project benefits or being able to voice comments or concerns during stakeholder engagement. The project will analyse and identify people with disabilities and provide opportunities 1) to include vulnerable and disadvantaged stakeholders in the information disclosure and consultation process in a meaningful way and 2) to include accessibility measures in project design, where financially and technically feasible, if disability risks and impacts have been identified as part of potential project impacts. Sound mitigation measures can result in not only an inclusive project, but demonstrate good international practice, and can raise awareness on disability issues and accommodating needs of vulnerable groups. The Project will also not allow unfair treatment or discrimination on the basis of personal characteristics unrelated to job requirements, such as race, gender, religion and sexual orientation.

4.4 Operation Phase

There are segments of the trail that are currently being used after the passage of hurricane Maria. However, with the rehabilitation of all segments the activities along the trail is expected to increase significantly. It is therefore important that the National Trail be protected through careful planning, management and monitored in order to ensure their long-term sustainability. Otherwise, negative impacts will be generated and tourism will instead contribute to the further deterioration of these areas. There are a few areas of concern during the operational phase of the trail.

4.4.1 Security and Safety

Safety of visitors is of paramount importance and tourists will not travel to areas perceived as unsafe and having insufficient security. Once a destination achieves a negative reputation, it is very difficult to rebuild visitor confidence; and such negative perceptions of a country will also affect the appeal of its protected areas. The trail will be mapped with GPS coordinates and a trail user guide will be available for visitors. However, other mechanisms and support systems need to be put in place to include training of Tour Guides that can provide professional services, clearly mark safety and exits signs, area indicating cell phone services and a registration of visitors using the trail, these which will better guarantee trail security and users safety, reduce risks, and respond to emergencies.

4.4.1.1 Lost or Hikers off track

The WNT is equipped with yellow and blue markings on permanent structures such as stones and trees ensuring that travellers remain on track. These markings may wear out or hikers may have overlooked these markings, this can also be combated by over grown bushes along the trail and hikers may get lost. Signs providing direction may also be damaged or not visible and hikers may become lost.

4.4.1.2 Robbery and Sexual assault

Due to the remoteness of most segments the risk of hikers being rob or sexually assaulted will be more likely to occur in comparison to a beach setting or on an urban trail environment.

4.4.1.3 Flash flood and drowning

Hikers must be cautious when travelling along certain areas of the trail that crosses rivers or is along waterways, these areas may experience flash flooding with little or no warning signs. As customary in Dominica downstream may be dry, and upstream may be experiencing heavy rainfall, thus giving a false indication to hikers of the weather conditions.

4.4.1.4 Temperature related ailments

Hikers may experience heat related illnesses like hyperthermia, heat exhaustion, heat stroke, sunburn dehydration; and hypothermia from becoming wet while hiking. Some segments have lush canopy through forested paths of the trails that provides shelter and shade at times; other area has road paths and areas of low or bushy vegetation that receive direct sun and heat increasing the difficulty of the trails.

4.4.2 Waste management along the trail

Once the trail has been fully restored, it is important that the Forestry Parks and Wildlife Division engage a maintenance crew for the upkeep of the trail. There is also a concern with littering on the trail, a practice mainly observed among local groups of hikers. Visitors' reception facilities are located at the entry point of a few segments and also along the way of others. These facilities complement the WNT with restroom facility, rest area, restaurant and to replenish before continuing the journey.

4.4.3 Injury

Injury can occur along any segment of the WNT and therefore hikers must display extreme caution traversing on unstable trail bed. Certain segments (segment 5) where the trail bed is primarily stones can be very slippery and travellers may trip and fall if they are not being cautious. Serious injury can also be caused from hiking along eroded trail bed at high elevations. Signage indicating the possible incident of injury as caution when walking on bridges, or steep areas or slippery stones etc are important to reduce injury to travellers.

4.4.4 Biological pest/nuisance

Visitors may expect to be bitten by certain insects such as mosquitoes, red beetles, bees, wasps and ants (red and blacks ants). Note that mosquitoes can transmit certain diseases such as dengue fever and therefore travellers hiking segments (segment 8) with a high population of mosquitoes must be completely clothed and have insect's repellent at hand. The boa constrictor which is the main specie of snakes in Dominica are non-poisonous and is of no harm to visitors. If anything, these may tend to move away from individuals. There are certain plants that can cause injury when they get in contact with the naked skin. These plants are primarily razor grass which has blades along the margin of its leaves that can cut the skin, the other plant is stinging nestle, which will create severe itching to the part of the skin it contacts.

Photo: Abundance of razor grass and thorn bushes on segment's 11



Chapter 5. Mitigation Measures

This section of the ESMP provides the mitigation measures to address each of the environmental and social risks identified in Chapter 4. Mitigation measures are provided in sections 5.1, 5.2 and 5.3 below for trail rehabilitation, construction and operation respectively.

5.1 Trail Rehabilitation Phase

Aspect	Potential Impacts	Proposed Mitigation
Destruction to Flora and disturbance to Fauna	<ul style="list-style-type: none"> ○ Destroy micro habitats ○ Aquatic life ○ Disturbance to wildlife 	<ul style="list-style-type: none"> ○ Stockpile soil cleared from landslides at least 10 meters from any nearby watercourses or drains. ○ Trees to be removed must be carefully identified and marked. Trees fell can be sold or if unsalable will be left to decompose. ○ Remove microhabitat such as rotten logs from the trail bed to the edge of the trail bed ○ Contractors should limit disturbance to aquatic life when working on water crossings or bridges
Impacts on surface water	<ul style="list-style-type: none"> ○ silt laden runoff washing into water bodies ○ Disposal of solid and liquid waste ○ Felling of trees in waterway and impeding flow of water 	<ul style="list-style-type: none"> ○ Refuel motorized equipment at least 10 meters from waterways, always using secondary containment to avoid spills into the environment. ○ Collect all spilled fuel from the containment and store in a secured drum. ○ Solid and liquid wastes must be removed from the site and taken to the approved disposal site outside the WNT. ○ Avoid felling trees into waterways. If it occurs, such trees must be removed and follow procedures described in the item above. ○ Surface water runoff from excavated areas should be directed to settlement/silt ponds to remove suspended solids prior to discharge to nearby watercourses.

Aspect	Potential Impacts	Proposed Mitigation
		<ul style="list-style-type: none"> ○ Direct surface water runoff away from and around access tracks by implementing a suitably designed drainage system to minimize potential for landslides along the access tracks. ○ Watercourse crossings to comprise culverts of suitable design.
Encroachment on private land owners	<ul style="list-style-type: none"> ○ Trespassing 	<ul style="list-style-type: none"> ○ Have easement or contractual arrangements and the terms of such agreement must be previously approved by the E&S Specialist in the PIU.
Workers' health and safety	<ul style="list-style-type: none"> ○ Accidents and incidents on trail rehabilitation works ○ Falls when working in gorges ○ Hypothermia and heat exhaustion including hyperthermia 	<ul style="list-style-type: none"> ○ Train workers on the use of brush cutter and chainsaw ○ Develop and implement an Emergency Response Plan to address potential accidents and incidents, especially when working in the forest far away from medical facilities. ○ Workers must inspect and wear personal protective equipment (PPE). PPE must be provided by the Contractor ○ Workers must wear personal fall arrest system (PFAS) (harness and lanyard), especially when constructing bridges over the gorges. ○ Contractors must select an appropriate anchor point for the personal fall arrest systems. ○ Contractor needs to provide first aid kit and emergency plan for accidents or incidents. ○ Ensure workers carry water and hydration fluids to work; ensure they have sheltered rest areas; encourage use of light loose-fitted clothing and having a dry change of clothes daily
Workers sexual exploitation, sexual abuse and sexual harassment	Physical, psychological abuse of a sexual nature interferes with the productivity of work and displays a lack of respect for project workers	<ul style="list-style-type: none"> ○ Contractor is required to develop and implement a Code of Conduct reflecting community, health and safety prevention and mitigation measures, including, prevention of gender-based

Aspect	Potential Impacts	Proposed Mitigation
		<p>violence and sexual exploitation and abuse (Annex 2)</p> <ul style="list-style-type: none"> ○ A Grievance Redress Mechanism (GRM) to deal exclusively with those grievances that involve workers employed by the Contractor for construction should be in place before start of works.
Labour and working conditions	unfair treatment and discrimination and unequal opportunity of project workers persons under 18 working on the project	<ul style="list-style-type: none"> ○ No person under the age of 18 years will be employed or engaged in any project activity. ○ Contractor will enforce Code of Conduct to prevent child labour i.e any person 18 year or below, and forced labour, avoid discrimination especially of vulnerable groups and allow employees to raise workers concerns ○ The Contractor will develop a GRM, so that workers can file complaints or develop a means where employees concerns are address. GRM and specific Labour Management procedures applicable to Works contracts should be in place prior to commencement of works and enforced throughout project implementation.
Disturbance to Cultural Heritage	Tampering with or removing items of cultural significance. (Segment 13 – Grand Fond)	<ul style="list-style-type: none"> ○ Post information signs and warning signs against removal of items, with fines and penalties for such activities.

5.2 Construction Phase

Aspect	Potential Impacts	Proposed Mitigation
Dust and noise	<ul style="list-style-type: none"> ○ Respiratory impacts to construction workers. 	<ul style="list-style-type: none"> ○ PPEs - Hearing protection for working around machinery where the noise exceeds 85 dB (according to approved procedures) ○ PPE's- wear dust mask to protect against fugitive dust created by using of an electric saw. ○ prebuild at site away from trail and assembly at trail to avoid excess dust, noise, and disturbance
Construction Waste and Debris	<ul style="list-style-type: none"> ○ Improper storage and/or disposal of materials ○ Creating land pollution by dispersion of materials in nearby streams. 	<ul style="list-style-type: none"> ○ Construction wastes must be stockpiled away from the trail and not pose safety hazards to hikers, wastes must be stored in containers and removed from the trail segment daily. ○ Collect and segregate wastes based on their classification and ensure disposal by the DSWMC. ○ prebuild at site away from trail and assembly at trail to avoid excess waste, ○ No burning of waste material ○ Mix fuel and refill equipment away from waterways and with secondary containment ○ Use funnel to avoid spillage ○ Store and transport fuel in the appropriate container and maintain spill response kit available.

Aspect	Potential Impacts	Proposed Mitigation
Workers' health and safety	<ul style="list-style-type: none"> ○ Injury to construction workers 	<ul style="list-style-type: none"> ○ Develop and implement an Emergency Response Plan to address potential accidents and incidents, especially when working in the forest far away from medical facilities. ○ Workers must wear personal protective equipment (PPE). PPE must be provided by the Contractor ○ Contractor needs to provide first aid kit and emergency plan for accidents or incidents. ○ Workers must receive clothing and footwear to prevent injury from razor grass and stinging nestle. ○ Contractors should provide workers' crews with sufficient anti-itch cream, insect repellent and basic first aid supplies.
Gender Based Violence (Workers sexual exploitation, sexual abuse and sexual harassment)	<ul style="list-style-type: none"> ○ Physical, psychological abuse of a sexual nature interferes with the productivity of work and displays a lack of respect for project workers 	<ul style="list-style-type: none"> ○ Contractor is required to develop and implement a Code of Conduct reflecting community, health and safety prevention and mitigation measures, including, prevention of gender-based violence and sexual exploitation and abuse (Annex 2) ○ GRM to deal exclusively with those grievances that involve workers employed by the Contractor for construction should be in place before start of works.

Aspect	Potential Impacts	Proposed Mitigation
Labour and working conditions	<ul style="list-style-type: none"> ○ unfair treatment and discrimination and unequal opportunity of project workers, persons under the age of 18 working on the project 	<ul style="list-style-type: none"> ○ No person under the age of 18 years will be employed or engaged in any project activity. ○ Contractor will enforce Code of Conduct to prevent child labour i.e any person 18 year or below and forced labour, avoid discrimination especially of vulnerable groups and allow employees to raise workers concerns. ○ The Contractor will develop a GRM so that workers can file complaints or develop a means where employees concerns are address. GRM and specific Labour Management procedures applicable to Works contracts should be in place prior to commencement of works and enforced throughout project implementation.
Disturbance to Cultural Heritage	<ul style="list-style-type: none"> ○ Tampering with or removing items of cultural significance. (Segment 13-Grand Fond) 	<ul style="list-style-type: none"> ○ Post information signs and warning signs against removal of items, with fines and penalties for such activities. ○ Contractors should educate employees on the need to preserve cultural and historic artifacts and implement internal penalties for doing so

5.3 Operation Phase

Aspect	Potential Impacts	Proposed Mitigation
Safety and Security	Tourist travelling may become lost and injured	<ul style="list-style-type: none"> ○ Sufficient warning and directional signs to avoid visitors being lost ○ Assign a Police Officer and Forest Patrols to heavily travel sites ○ Recommend a tour guide for new visitors traveling the trail. ○ Every hiker should be registered with trail management office before proceeding to hike (name, age, potential medical issue – non-mandatory, date of intention to hike, trails to be hiked, direction of hike etc) ○ Have safety information accessible to all visitors so that they may plan their hike. This includes the list of risks and mitigative actions and the need to have an Emergency Preparedness and Response Plan before travelling to address the most common and likely emergency medical, technical and natural disasters' events. ○ Forest Patrols and Policy Officers also need to develop and implement a Contingency and Emergency Response Plan for each of the potential cases identified in this document ○ At every entry point, a signage should read: Tour guide required if not, hike at your own risk.
1. Biological pest /nuisance	Ill health or Bodily injury	<ul style="list-style-type: none"> ○ Wear long sleeves, proper and comfortable clothing and foot wear to prevent injury from razor grass and stinging nestle. ○ Travellers should be equipped with anti-itch cream, insect repellent and basic first aid supplies.

Aspect	Potential Impacts	Proposed Mitigation
2. Lost and getting off-track	Lost	<ul style="list-style-type: none"> ○ Have a tour guide ○ Plan hikes to begin early in the day to avoid nightfall ○ Identify exit points along the trail, so that tourists who cannot complete a segment can cut their trip short and exit. ○ Have a well charged phone and have a portable power supply and water ○ Have a hand-held GPS
3. Injury	Trip and fall	<ul style="list-style-type: none"> ○ Comply with signs indicating the dangers along certain segments e.g slippery stone and possible flash flooding. ○ Construct adequate steps or ropes to assist hikers in difficult areas ○ Adhere to caution signs ○ Wear proper footwear
4. Temperature related ailments	Sunburn, heat stroke, burns and hypothermia	<ul style="list-style-type: none"> ○ Use sun screen where necessary ○ Keep hydrated ○ Stay away from the extreme heat ○ Keep a safe distance from sulphur springs
5. Waste Management	<p>Improper disposal of solid waste along the trail Unsightliness and smell of strewn waste along trail.</p> <p>Increase in populations of rodents or even dogs and cats.</p>	<ul style="list-style-type: none"> ○ Visitors must not dispose of any waste on the trail. Solid waste primarily inorganic waste will be disposed of in bins located at the entrance facility of the trail ○ Practice sustainable travel by “taking photos and leave footprints”. ○ Provide garbage bins at trail entry and exit points with waste collection schedule by trail or tourist reception management
6. Flash flood and drowning	Hikers being wash away of drowning	<ul style="list-style-type: none"> ○ Check the weather before hiking, take note of flash flood areas
7. Robbery and Sexual Assault	Loss of personal property and injury	<ul style="list-style-type: none"> ○ Hike in groups of at least 4; no lone hiking ○ Avoid the hiking of females only ○ leave important documents at one’s place of lodging ○ Seek a tour guide

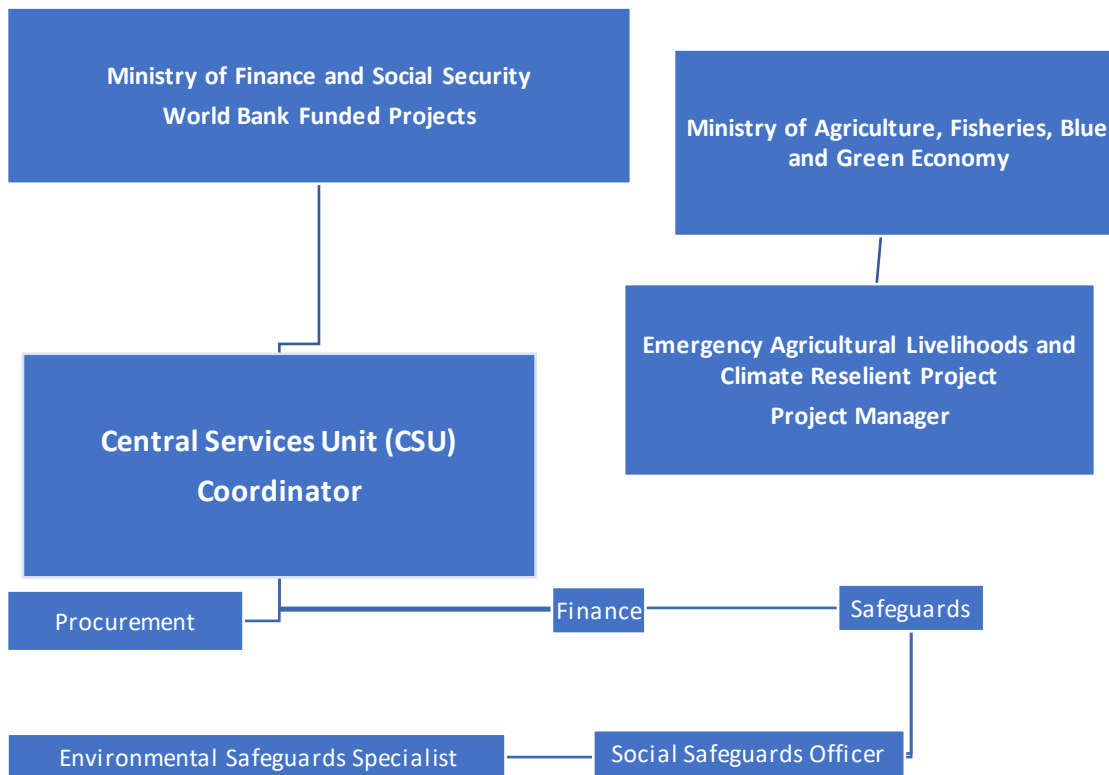
Aspect	Potential Impacts	Proposed Mitigation
8. Disturbance to Cultural Heritage	Tampering with or removing items of cultural significance. (Segment 13 – Grand Fond)	<ul style="list-style-type: none"> ○ Post information signs and warning signs against removal of items, with fines and penalties for such activities.

Chapter 6. Project Management and Institutional Arrangements

6.1 ESMP Implementation Responsibilities

The overall responsibility of ensuring that the mitigation measures under this ESMP are implemented through the Central Services Unit. This newly established Unit provides procurement, finance and safeguards functions for all World Bank funded projects in Dominica, including the Emergency Agricultural Livelihood and Climate Resilient Project. The Central Services Unit is manned a Coordinator who reports to the Financial Secretary within the Ministry of Finance. The figure below provides an overview of the organizational structure that will support and implement the Rehabilitation of Segments 4, 11, & 13 of the Waitukubuli National Trail.

ORGANISATIONAL CHART FOR THE CENTRAL SERVICES UNIT



The PIU will have the overall responsibility for project implementation. The Project Implementation Unit (PIU) is physically located at 19 King George V St, Roseau. A Project Manager will lead the day-to-day implementation of the project and will report to the Permanent Secretary, Ministry of Blue and Green Economy, Agriculture and National Food Security on the coordination of efforts with other partners, and for technical coordination of activities financed under the project. The CSU Environmental Specialist and Social Safeguards Officer will be responsible for the day-to-day activities in instructing and monitoring compliance with World Bank safeguards and the relevant laws of Dominica, including this ESMP.

6.2 Contractor Responsibilities

Engagement of Contractors will be managed by the EALCRP PIU. Standard environmental and social related requirements will be included in the bidding documents, including compliance with this ESMP. Therefore, for purposes of cost estimation and budgeting, the contractors must be aware of the existence of the environmental mitigation measures and associated ESMP requirements established herein and include cost items for such purposes in their proposals.

Environmental and social related clauses, including compliance with this ESMP, will also be developed and appended to or incorporated into contracts and shall remain in force throughout the contract period.

6.3 Supervision, Monitoring and Reporting

It is the responsibility of the CSU Environmental specialist and social safeguards officer to ensure that the ESMP is being followed by the contractor(s) responsibility for the trail rehabilitation. This will be done by conducting site visits as required throughout out the rehabilitation of the trail and construction of amenities. The PIU Project Engineer is the technical person for monitoring and ensuring that construction specifications are met and provides regular site inspection. The PIU Project Engineer, Forest Officer and the Environmental Specialist are in constant communication to ensure that all technical specification and safeguard procedures are met respectively.

The PIU Safeguards Team will monitor and report to the Bank (quarterly) on the trail rehabilitation works and minor construction. The PIU Forest Officer will be the primary liaison between the Division of Forestry and the PIU, whom will support towards monitoring of works.

During the rehabilitation of the trail and minor construction work, primary environmental and social monitoring will be carried out by the Contractor, with support from the PIU Project Engineer to provide oversight on technical aspects. In addition, the PIU Project Engineer will be required to prepare and submit reports (monthly) to the EALCRP PIU Project Manager. These reports provide update on construction works to include: overall project timeline completion status, action items, project risks, non-conformities with the environmental and social and health and safety requirements and the proposed mitigation plans.

Chapter 7. Stakeholder Engagement

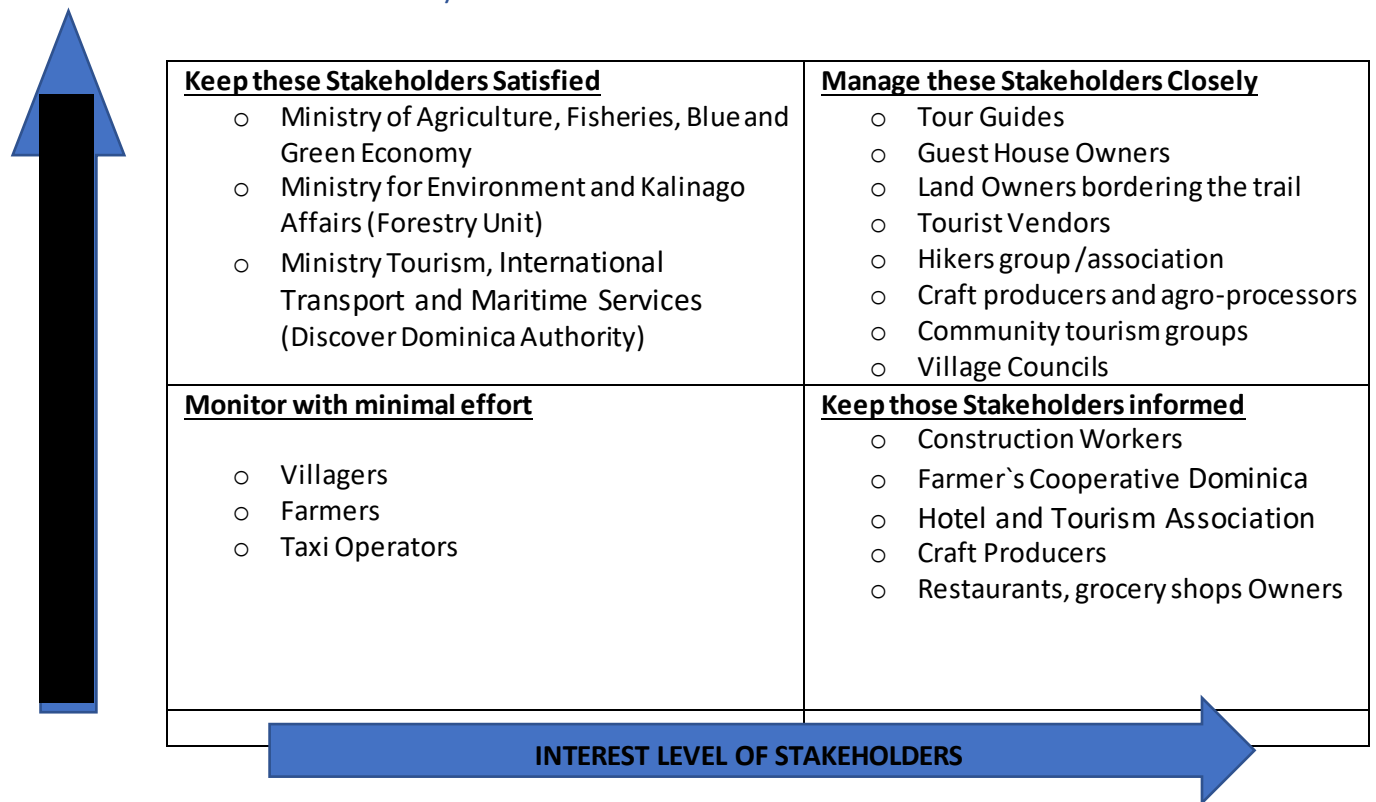
7.1 Stakeholder Identification

Stakeholder engagement is the continuing and interactive process by which the PIU identifies, communicates and facilitates a two-way dialogue with the people in the communities where trail works will be conducted. The PIU will provide stakeholders with timely, relevant, understandable and accessible information and consult with them in a culturally appropriate manner.

Beneficiaries’ feedback will be recorded and responded to during the consultation sessions and throughout the project cycle. There are other groups of Stakeholder who are in decision-making positions or have certain influence based on their position. These are the Division of Tourism and Forestry who make decisions at the top level and to a lesser extent the Kalinago Chief, Kalinago Council and village councils who will be consulted and contribute to the trail rehabilitation works at the lower level.

Stakeholders are all those who may benefit directly or indirectly from the rehabilitation of the WNT. Some of the direct stakeholders are the tour guides; homestay owners, land owners bordering the trail, especially those who already have business. A number of other service providers may benefit in the long term due to future plans to invest in businesses in the related field of natural resource management.

7.2 Stakeholder Analysis



7.2.1 Categories of Stakeholders (External and Internal)

Government Ministries (Internal)	Private Sector (External)
Ministry of Tourism, International Transport and Maritime Services <ul style="list-style-type: none"> Discover Dominica Authority 	Hiking Clubs <ul style="list-style-type: none"> Dwivayez hiking club Next level Hikers
Ministry of Agriculture, Fisheries, Blue and Green Economy <ul style="list-style-type: none"> Division of Agriculture 	Dominica Hotel and Tourism Association <ul style="list-style-type: none"> Various hotels island wide Homestay Owners
Ministry of Environment, Rural Modernisation, Kalinago Upliftment and Constituency Development <ul style="list-style-type: none"> Division of Forestry, Wildlife and Parks 	Community Tourism groups <ul style="list-style-type: none"> Farmers and Farmers' Cooperatives Craft Producers Food vendors
Village Councils	Tour Guides association <ul style="list-style-type: none"> Tour guides
Kalinago Council	Supermarkets, groceries and corner shops
	Agro-processors
	Restaurants
	Fishermen,
	Construction Companies <ul style="list-style-type: none"> construction workers,

7.3 Consultations

Stakeholder engagement will be carried out throughout the life of this project. Some have already been completed for the trail audit which took place from September 2022 to March 2023, and more will continue during the rehabilitation and construction of the three priority segments (4, 11, & 13). Stakeholder engagement will be carried out prior to trail rehabilitation. Consultations will be face to face in nature and in group settings.

The three segments to be rehabilitated under the project are 4 11 and 13. This will be based on the audit assessment of the WNT, and has been prioritized by the Forestry, Wildlife and National Parks Division. This audit was done over a six-month period from September 2022 to March 2023.

7.3.1 Presentation by Audit and Design Consulting Firm

On Friday 17th March 2023, a stakeholder engagement was conducted at the Ministry of Planning's conference room with 10 persons in attendance. Those present were the Permanent Secretaries of Agriculture and Tourism, PIU Coordinator, PIU Forestry Officer, PIU Safeguards team along with members from Geomatic Technologies, Esprit Ultimate Designs and PENDEC: Pro Engineering Design Consultant (The team who conducted the audit of the WNT). During this consultation a presentation was done by the three firms on the audit and design of civil works for the rehabilitation of the WNT. Below is a table of the matters discussed.

7.3.2 Concerns and proposed solutions

<i>1. Concerns over Land ownership</i>	<i>Proposed Solutions</i>
<ul style="list-style-type: none"> ● According to the report from PENDEC, all 14 segments of the trail have areas where the trail passes on or near private property. ● Some of the properties on the trail may have changed ownership over time. As a result, it would be necessary to revisit the easement forms. ● The creation of buffer zones within the areas where the trail passes was also a key topic of discussion. No commercial operation should be done within the areas where the trail passes 	Ease of access agreement

7.3.3 Concerns and proposed solutions

<i>1. Concerns over Land ownership</i>	<i>Proposed Solutions</i>
<ul style="list-style-type: none"> ● According to the report from PENDEC, all 14 segments of the trail have areas where the trail passes on or near private property. However, the segments 4, 11 and 13 to be rehabilitated does not pass through private lands ● Some of the properties on the trail may have changed ownership over time. As a result, it would be necessary to revisit the easement forms. ● The creation of buffer zones within the areas where the trail passes was also a key topic of discussion. No commercial operation should be done within the areas where the trail passes 	Ease of access agreement

<i>2. Concerns over Trail Maintenance</i>	<i>Proposed Solutions</i>
<ul style="list-style-type: none"> Who should be responsible for the upkeep of the trail? 	<ul style="list-style-type: none"> A suggestion was made for trails to be adopted by larger stakeholders (Hotels) who would be responsible for the trails upkeep. Community Tourism groups being key stakeholders could serve as maintenance crew. Depending on the proximity of the trail to a village, then it would be the responsibility of the National Employment Programme to ensure that this area is maintained. The Forestry Division being the main beneficiary of the WNT would have to take ownership and responsibility to ensure that the trail is in good condition. It was noted that for some tasks, a training of Forest Officers would be necessary due to the task's difficulty. <p>The optimal maintenance plan for the trail begins with the Government making the necessary budgetary allocations (staff, equipment, vehicles) for maintaining the trail.</p>

<i>3. Concerns over Trail Safety</i>	<i>Proposed Solutions</i>
<p>The issue of trail safety is of grave concern and should be top priority. Certain measures should be put in place to ensure that visitors and hikers alike are safe on any of the segments of the WNT.</p>	<ul style="list-style-type: none"> It was suggested that persons willing to take on the challenge of trekking the WNT should never do so alone and for difficult segments, a tour guide is required. Proper attire is necessary. This includes: long sleeves, hiking boots, (in case of longer segments it is advised to hold extra clothing, food and water). It would be recommended that hikers trek with both a Digicel and Flow phone/sim cards since certain areas on some segments are dead areas. So, in case of an injury or an emergency it would be possible to call for help. The installation of handrails, ropes, caution/safety signs in areas where necessary. Installation of chicken coop wire on the bridges to prevent falls. The formation of a WNT rescue committee which should comprise of Forestry Officers, First Responders, Police Officials and Members of hiking

	clubs. Development of a hiking registry. Registration of a hike is compulsory. No one should be on a segment without registering with the WNT Committee.
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<i>4. Concerns over Designs</i>	<i>Proposed Solutions</i>
Concerns were raised about the design of the trail and whether the trail will remain as is.	<ul style="list-style-type: none"> • Suggestions were made as to having the beginning of each segment designed in a unique manner. Therefore, each segment would have a sign depicting something unique about this particular segment.

<i>5. Concerns over Trail route</i>	<i>Proposed Solutions</i>
<i>Trail route</i> The rehabilitation of the WNT should have some visible difference.	<ul style="list-style-type: none"> • From the discussion it was disclosed that the trail bed needs maintenance as some areas have gotten too narrow. • Rerouting of certain parts of the trails due to land slippage. Segment 1 in particular was identified.

7.3.4 Engagement of the Roseau Valley Community on segment 4

On May 8th 2023 stakeholder engagement was held at the Trafalgar resource centre with 30 people in attendance; 12 males and 18 females. Segment 4 of the WNT is in close vicinity of the villages of Trafalgar, Wotten Waven, Shawford, Pond Case and Laudat. Those present were from all walks of life such as guest house owners, vendors, farmers, village council members and skilled labourers. Also present were representatives from the Ministry of Tourism and the Forestry Division.

Outcome of engagement on segment 4

Participants	Concerns	Suggested Solutions
Chairman of the Wotten Waven Village Council Vendor Vendor Bed and Breakfast Owner	<i>Tour guides</i> <ul style="list-style-type: none"> • A concern was raised on the continuation of tour guide training and whether this activity will be ongoing even after the project. 	<ul style="list-style-type: none"> • Having a tour guide should be mandatory when hiking the trail. • There is the need for tour guides to be well equipped with safety instruments because far too often the hikers are way more equipped than the tour guides.

		<ul style="list-style-type: none"> • Employment creation as result of new tour guides being trained.
Chair of Village Council)	<p><i>Rehabilitation works</i></p> <ul style="list-style-type: none"> • Stakeholders are concerned about the water overflow when it rains since potential danger may arise and this area is known for numerous springs. • Along the trail there is no need for the construction of toilets, benches and tables. 	<ul style="list-style-type: none"> • The need for bridges in these areas is of utmost importance. • During the construction phase of the project, payments should accompany the number of hours worked. This method should also be used in the trail maintenance.
Bed and Breakfast Owner Vendor	<p><i>Cable car project</i></p> <ul style="list-style-type: none"> • The commencement of the cable car project within the Ladaut area is a matter of grave concern. Stakeholders fear that this venture will not be beneficial to the people in the area. In fact, some fear that this project will even take away from their livelihoods. • It was mentioned that the Ministry of Tourism seems to mix both nature loving tourists and cruise ship tourist together. This means that the construction of the cable car is directed to the cruise ship passengers and the nature loving hikers aren't catered to. • Fear that conservative ecotourist who are attracted to the island 	<ul style="list-style-type: none"> • Stakeholder consultations should be conducted since there are several concerns being raised about the Cable Car project.

	<p>my boycott Dominica's tourism product because it doesn't live up to its name as the Nature Isle.</p> <ul style="list-style-type: none"> • The introduction of the cable system within the area means that there will ultimately be the introduction of metals. The Wotten Waven, Trafalgar, Laudat area is known to have an extremely high sulphuric content. Sulphur from the area would cause rapid corrosion to the metals. This would mean that there would be a high maintenance cost for this project. 	
Arts and Craft shop owner)	<i>Rerouting</i>	<ul style="list-style-type: none"> • Segment 4 to include key sites within the area. One such area is the Valley of Desolation. This route would shorten the length of the trail. • Depending on where the rerouting takes place, shortening the length of the trail may affect the water source. • Include the feeder roads as part of the trail on segment 4. This would mean that the roads would be maintained since they are currently in a bad state. • Looping the trail would also be beneficial to stakeholders since hikers would spend more time in the area and as a result

		more monies will also be spent.
villager	<i>Operational hours</i>	<ul style="list-style-type: none"> Trail should be time specific. There should be a cut off time when the trail closes and when it opens. This will serve as a safety measure and it will also enable the authorities to be more aware of who is using the trail at any given time.
	<i>Beautification and food</i> <ul style="list-style-type: none"> Some parts of the trail is a long way from the nearest shop. Concerns were raised on having access to food. 	<ul style="list-style-type: none"> The introduction of fruit trees along the trail will serve both as a form of beautification and food. The idea is to sell tourists the ultimate experience.
Business Owner	<i>Trail maintenance.</i> <ul style="list-style-type: none"> Who is responsible for trail maintenance? The maintenance of the trail is of absolute necessity if Dominica wants to continue to have the WNT as a product. At present, the trail bed of segment 4 of the WNT is deteriorating 	<ul style="list-style-type: none"> Various groups within the area could each adopt a portion of the trail.

7.3.5 Community Engagement on segments 11

Discussion with landowner where the parts (Rose Castle estate) of segment 11 traverses, the landowner has agreed for the rehabilitation works to be done on his property. Works will include clearing of excessive vegetation that covering the trail. The landowner is requesting that the gazebo and rest room facilities be repaired and he would do the maintenance works of these facilities. Discussion were held to repair the bridge located in the vicinity of Rose Castle estate

7.3.6 Community Engagement on segments 13

Participants	Concerns	Suggested Solution
Penville	<i>Grand Fond rehabilitation</i>	<ul style="list-style-type: none"> Collaboration between both the

<p>Tourism Development Committee</p>	<ul style="list-style-type: none"> • Preference should be given to the lost village of Grand Fond in regards to having a gazebo set up in the area. • Grand Fond is regarded as the peak of the segment and as a result segment 13 should be renamed after it. • Segment 13 should be marketed as a historical trail 	<p>Penville village council and the Capuchin village council to come to an agreement as to what should be done as part of the rehabilitation of the segment. (It should be noted that some of the last surviving residents of Grand Fond reside in Capuchin).</p> <ul style="list-style-type: none"> • Communication with knowledgeable people from both communities concerning the historical fact of the lost village so this information can be captured. • Informative sign at the site of the former estate house at Grand Fond should be erected. Presently, the history and knowledge of Grand Fond is somewhat lost, even when hikers get to Grand Fond they aren't even aware of their location since the information is lacking.
<ul style="list-style-type: none"> -Penville Village Council -Bed and Breakfast Owner -Capuchin Cultural group representative -Tour guide 	<p><i>Trail rerouting</i></p> <ul style="list-style-type: none"> • Some areas proved to be extremely dangerous on a segment that is marketed for the entire family. • Even though the segment ends at Capuchin, the village itself does not benefit from the segment. • Some key areas near the trail are not part of the trail (eg. Loposwè; which was 	<ul style="list-style-type: none"> • Rerouting the trail would lead to hikers spending more time on the segment which in turn would benefit the segment in the long run since there would be more to do and see.

	<p>once a port of entry.)</p> <ul style="list-style-type: none"> Along the village of Capuchin where the trail ends (Cannor Park) there aren't any restaurants nearby so hikers have nowhere to eat a meal or light lunch. 	<ul style="list-style-type: none"> Suggestions were made for vendors to locate themselves within the vicinity of Cannor Park however due to the uncertainty of the times hikers would arrive this would be almost pointless. Hence another reason why the trail should be rerouted to include the village of Capuchin itself.
Craft maker	Trail rehabilitation Works	<ul style="list-style-type: none"> The trail rehabilitation works should be undertaken by competent stakeholders from the area. The stakeholders already have their own ideas as to how these works should be done, since some individuals within the area are familiar with these types of works. The installation of a bridge at Delaford is necessary since it is difficult to hike the area when it's raining. Road rehabilitation on segment 13 should include easement of rite of passage from Mr. Seaman.
Penville Village Council Chairman	<p>Trail bed expansion</p> <ul style="list-style-type: none"> Presently the trail bed in some areas is about 2 ft in width which is potentially dangerous in some places. 	<ul style="list-style-type: none"> Trail bed is of utmost importance and so expansion is necessary. The trail bed should be about 4 – 5 feet in width.
Tour guide	<p>Ticketing System</p> <p>The ticketing system is currently ineffective.</p>	<p>Automatic ticketing system should be included to solve the problem of hikers accessing the trail without making payments.</p> <p>Additionally, there should be an increase in the price of user fees.</p>
Farmer	Trail maintenance	<p>The trail from Penville to Capuchin has always been maintained by the people from the area and it should remain as is.</p> <p>Mango Gardens, a guest house in the area does the maintenance works on most of the entire length of segment 13. After the passage of</p>

		hurricane Maria, Mango Gardens has invested significant sums in the clearing of segment's 13. The Owner is therefore requesting that their name be put on the entry sign of segment 13 indicating, "trail maintained by Mango Gardens".
Tour guide	Lack of telecommunication services	Signage should be placed in the areas where telephone services aren't available. Also, on the main signs from both entrances to the trail, this information should also be available. Capuchin group should invest in a hand radio system. (The group could write up a project to receive support in this area)
Capuchin Village Council	Tour guide shortage	Networking with Portsmouth Association of Yachties (P.A.Y.S) for the certification of tour guides in the area. The Capuchin Village Council should liaise with P.A.Y.S and incorporate a roster system specifically for the trail.
Bed and breakfast owner	Safety at Cannor Park <ul style="list-style-type: none"> Some locations at the Cannor Park are not safe. Some edged are literally cliff edges. 	The fencing (planting of hedges) of cannor park to make the area safe for hikers. The installation of signages to indicate where areas are unsafe.
Representative for the Capuchin Cultural Group	No motorable road at Cannor park	The construction of motorable road to traverse down into the park in the form of a pathway (cobblers walk)
Tour guide	Increase tourist arrival	Proper marketing of segment 13 by the village council, P.A.Y.S and tour guides alike.

7.4 Disclosure

This ESMP is a working document and involves numerous engagements with different stakeholders prior and during trail rehabilitation. The draft ESMP will be disclosed on the EALCRP PIU's website at <http://piu.agriculture.gov.dm/safeguards>, after it has been reviewed and cleared by the World Bank. This disclosure will allow for comments and feedback. Comments and feedback will be incorporated into the final ESMP document.

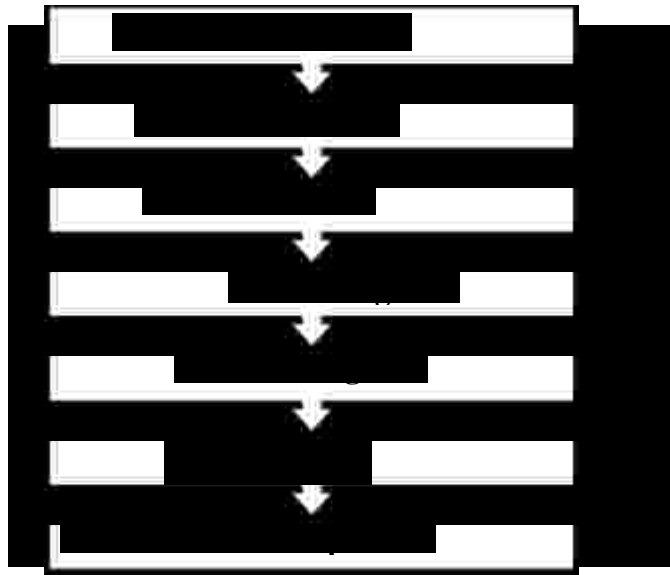
7.5 Grievance and Redress Mechanism (GRM)

7.5.1 Central Services Unit (CSU) GRM

The CSU has prepared a project-wide Grievance Redress Mechanism (GRM) to receive and facilitate the resolution of concerns and grievances associated with the Emergency Agricultural Livelihood and Climate Resilient Project and related activities to include the rehabilitation of the WNT will be addressed by the CSU Social Safeguards Officer. The GRM can be viewed in detail on the EALCRP PIU's website at <http://piu.agriculture.gov.dm/safeguards>.

The GRM will enable the CSU to address any grievances against this specific sub-project activity. It must be noted that this GRM covers grievances that relate to the impacts that the project may have on people and communities.

The GRM process



The EALCRP PIU will be responsible for registering, tracking, addressing and resolving any grievances raised by individuals or groups. Grievances can be submitted to the EALCRP PIU:

- **Email:** A complainant can email the CSU Safeguards Team that is attached to the EALCRP PIU to complain. Complainant will receive email acknowledging complaint and be advised to complete a grievance form and sign (electronic or by reporting to nearest office).
 - Project Manager, Kervin Stephenson Email: stephensonke@dominica.gov.dm
 - Environmental and Social Safeguards Specialist, Michael McIntyre Email: mcintyrem@dominica.gov.dm
 - Social Safeguards Officer, Kamarsha Sylvester email: sylvesterk@dominica.gov

- **Write a letter:** to the EALCRP PIU, Project Manager, Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP), 19 King George V St., Roseau, Dominica to complain (respond to letters via telephone or email, inviting complainant to complete an official grievance form/transfer information from letter to grievance form; record complaint in log)
- **Telephone: Complainants can call the EALCRP PIU at (767) 266 3998**
- **In Person:** Complainants can report to the EALCRP PIU office at 19 King George V St., Roseau, Dominica, to complete and submit a grievance form. They can also register their complaint directly to the Environmental and Social Safeguards Specialists.
- **Anonymous Complaints:** are accepted through all above-mentioned channels. Complainants can submit their grievances without providing personal contact information.
- **PIU Project Manager or Staff Complaints:** Complainants can telephone, email or write letters to the Permanent Secretary, Ministry of Blue and Green Economy and Agriculture and National Food Security.

A grievance will be acknowledged in writing or email, by the CSU Safeguards Team within five (5) working days of a grievance being submitted to the EALCRP PIU and high-level cases will be responded within 10-20 working days. The CSU Safeguards Team will communicate verbally, written form or email to the complainant, as well as contact the complainant to verify that the grievance has been resolved and also gather any feedback on the grievance process. Grievances under this GRM are classified as Level 1 (Low Risk), Level 2 (Substantial Risk) and Level 3 (High Risk). While all grievances are considered important and critical, Levels 2 and 3 are classified as high priority, with Level 3 being the highest priority. If the complainant is not satisfied with the resolution and/or does not agree with the proposed actions, the EALCRP PIU will need to escalate the matter to the Grievance Committee. The Grievance Committee consists of the project manager, the permanent secretary of the Ministry of Agriculture and a member of CREAD (Climate Resilience Execution Agency for Dominica). The EALCRP PIU is committed to resolving complainant's grievance and as required will convene an independent Grievance Committee to resolve the grievance.

The CSU will communicate the GRM process to its external and internal stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances.

7.5.2 Workers sexual exploitation, sexual abuse and sexual harassment

Some cases, such as that of sexual exploitation and sexual abuse/ sexual harassment (SEA/SH) are sensitive and may not be reported due to the risks of stigmatization, rejection and reprisals against survivors. This creates and reinforces a culture of silence and survivors may be unwilling

to approach the authorities. The Contractor should also include in the code of conduct (annex 2) measures to address sexual exploitation and abuse and sexual harassment incidents that may occur.

7.5.3 World Bank Redress Mechanism

The Grievance Redress Service (GRS) is an avenue for individuals and communities to submit complaints directly to the World Bank if they believe that a World Bank project has or is likely to have adverse effects on them, their community, or their environment. The GRS enhances the World Bank's responsiveness and accountability to project-affected communities by ensuring that grievances are promptly reviewed and addressed.

Any individual or community who believes that a World Bank-supported project has or is likely to, adversely affect them can submit a complaint. Complaints must be in writing and addressed to the GRS. They can be sent:

- **ONLINE** – through the GRS website at www.worldbank.org/grs
- **BY EMAIL** at grievances@worldbank.org
- **BY LETTER OR BY HAND** delivery to any World Bank Country Office
- **BY LETTER** to the World Bank Headquarters in Washington at The World Bank Grievance Redress Service (GRS) MSN MC 10-1018 1818 H St NW Washington DC 20433, USA

Chapter 8. ANNEXES

Annex 1: Environmental and Social Screening Checklist

The form below identifies potential impacts of the proposed activities envisioned under Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP). Many of the actions or activities have low or negligible potential negative impacts, such as purchase of equipment, raw materials and supplies. Some may have impacts that are typical for small construction or rehabilitation projects, such as repair of damaged infrastructure, buildings, or facilities.

Section A: Background information

Subproject Name	Restoration of Key Infrastructure in Agriculture and Forestry
Subproject Purpose	<input type="checkbox"/> New Structure <input type="checkbox"/> Expansion of existing structure <input checked="" type="checkbox"/> Renovation of existing structure <input type="checkbox"/> Construction of waste disposal system
Subproject Location	Island Wide-Dominica
Subproject property ownership	<input checked="" type="checkbox"/> Government of the Commonwealth of Dominica <input type="checkbox"/> Own <input type="checkbox"/> Lease Agreement
Subproject current property use	<input type="checkbox"/> Industrial <input type="checkbox"/> Commercial <input type="checkbox"/> Agricultural <input type="checkbox"/> Residential <input checked="" type="checkbox"/> Recreational
Subproject Component	Rehabilitation of the Waitukubuli National Trail (WNT)
Estimated Investment	1.4 million USD
Tentative Start/Completion Date	July 2024 to December 2024

Section B: Construction Issues

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

If answers to any of the above is 'yes', please include an ESMP in sub-project implementation.

Section C: Environmental Issue

Will the sub-project	YES	NO
Create a risk of increased soil erosion?		X
Create a risk of increased deforestation?		X
Create a risk of increasing any other soil degradation?		X
Affect soil salinity and alkalinity?		X
Divert the water resource from its natural course/location?		X
Cause pollution of aquatic ecosystems by sedimentation and agro-chemicals, oil spillage, effluents, etc.?		X
Introduce exotic/alien plants or animals?		X
Involve drainage of wetlands or other permanently flooded areas?		X
Cause poor water drainage and increase the risk of water-related diseases such as Dengue?		X
Reduce the quantity of water for the downstream users?		X
Result in the lowering of groundwater level or depletion of groundwater?		X
Create waste that could adversely affect local soils, vegetation, rivers and streams or groundwater?		X
Reduce various types of livestock production?		X
Focus on biomass/bio-fuel energy generation?		X

If answers to any of the above is 'yes', please include an ESMP in sub-project implementation.

Section D: Health and Safety Issues

Will the sub-project:	YES	NO
Impact health of the community		X
Does the project include measures to ensure a safe and healthy working environment for workers employed as part of the project?	X	
Interfere with the normal health and safety of the worker/community?		X
Increase safety concerns due to introduction of the project?		X

Section E: Socioeconomic Issues

Will the sub-project:	YES	NO
Displace people from their current settlement?		X
Reduce the employment opportunities for the surrounding communities?		X
Reduce settlement (no further area allocated to settlements)?		X
Reduce income for the local communities?		X
Increase exposure of the community to communicable diseases such as HIV/AIDS?		X
Cause an influx of labour?		X
Induce conflict?		X

Introduce new practices and habits?		X
Lead to child delinquency (school drop-outs, child abuse, child labour, etc.)?		X
Lead to gender disparity or gender-based violence?		X
Lead to poor diets?		X
Lead to social evils (drug abuse, excessive alcohol consumption, crime, etc.)?		X
Cause an increased exposure of the community to COVID-19?		X

Section F: Natural Habitat

Will the sub-project:	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). (X	
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.		X
Affect the indigenous biodiversity (flora and fauna)? NB: If the answer is yes, the sub-project should not proceed.		X
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.		X
Affect the aesthetic quality of the landscape?		X
Reduce people’s access to the pasture, water, public services or other resources that they depend on?		X
Increase human-wildlife conflicts?		X
Use irrigation system in its implementation?		X

NB: If the answers to any of the above is ‘yes’, please include an ESMP/Natural Habitat Management Plan with sub-project application

Section G: Pesticides and Agriculture Chemicals

Will the sub-project:	YES	NO
Involve the use of pesticides or other agricultural chemicals, or increase existing use?		X
Cause contamination of watercourses by chemicals and pesticides?		X
Cause contamination of soil by agrochemicals and pesticides?		X
Experience effluent and/or emissions discharge?		X

Export produce? Involve annual inspections of the producers and unannounced inspections?		X
Require scheduled chemical applications?		X
Require chemical application even to areas distant away from the focus?		X
Require chemical application to be done by vulnerable group (pregnant mothers, chemically allergic persons, elderly, etc.)?		X

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

Section H: Vulnerable and Marginalized Groups meeting requirements for OP 4.10

Are there:	YES	NO
People who meet requirements for OP 4.10 living within the boundaries of, or near the project?		X
Members of these VMGs in the area who could benefit from the project?		X
VMGs livelihoods to be affected by the subproject?		X
Affect vulnerable people and underserved groups (e.g., children, elderly poor pensioners, physically challenged, women, particularly head of households or widows, etc.)?		X
Require temporary relocation for a vulnerable population affected (children, physically challenged, elderly, minority group etc.)?		X

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

Section I: Land Acquisition and Access to Resources

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

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 J: Proposed action

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

Activities and actions with low potential E&S risk require no further safeguards actions. Those with moderate potential risk will be managed using the general ESMF for the Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP), and will typically require that an ESMP be developed. Those with moderate to substantial potential risk will be managed using the tools in the general ESMF for the Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP) along with the additional safety guidance and information provided in this ESMP.

A Natural Habitat plan is not necessary as the rehabilitation of the trail is very site specific only to about 6ft wide and will not adversely impact a vast area of the flora and fauna of the forest.

Annex 2: Right of Passage Agreement



**MINISTRY OF ENVIRONMENT, RURAL MODERNISATION, KALINAGO UPLIFTMENT AND CONSTITUENCY
EMPOWERMENT**

FORESTRY, WILDLIFE & PARKS DIVISION

WAITUKUBULI NATIONAL TRAIL

RIGHT OF PASSAGE AGREEMENT

By and between the undersigned

Mr./Mrs.

Living at

Landowner of the plot located in the parish of

Duly registered in the land Registry as follows

Hereinafter called "the Owner"

AND

THE GOVERNMENT OF THE COMMONWEALTH OF DOMINICA represented by

the **MINISTRY OF ENVIRONMENT, RURAL MODERNISATION, KALINAGO UPLIFTMENT AND CONSTITUENCY EMPOWERMENT** 1st Floor Financial Centre, Kennedy Avenue, Roseau, Commonwealth of Dominica.

It was formally agreed that:

Article 1 - Purpose:

The owner grants the Ministry of Environment, Rural Modernisation, Kalinago Upliftment and Constituency Empowerment free right of passage through his plot for the purpose of the hiking track named "WAITUKUBULI NATIONAL TRAIL" linking Scotts Head to Portsmouth, and specifically located inin the territory of the parish of.....

The owner hereby agrees to have the track passing through his plot marked and signalled, and grants free access to the said track to hikers.

Article 2 - Upkeep and Maintenance:

The Ministry of Environment, Rural Modernisation, Kalinago Upliftment and Constituency Empowerment shall ensure maintenance and proper upkeep of the trail. Said upkeep shall be commensurate with the need to keep the trail accessible and safe for hikers and walkers at all times.

The owner hereby agrees to let the people nominated by the Ministry of Environment, Rural Modernisation, Kalinago Upliftment and Constituency Empowerment do the said upkeep, according to the appropriate schedule.

The owner shall be informed beforehand of any and all projects concerning new equipment or works (aside from routine upkeep) that the Ministry would envisage to add in the part of the trail crossing through the owner's plot, so that he is given due time to give his prior agreement to the said work to be performed.

Article 3 - Transfer of Civil Liability:

This agreement shall be construed as a transfer of civil liability from the owner to the Ministry for the purpose of the use of the trail.

Article 4 - Signalling of the Grounds:

Upon request from the owner, the Ministry may put up signs and indications at each side of the concerned plot indicating that the grounds are private property on which pedestrian access only is tolerated exclusively inside the trail.

Article 5 - Respect of Property Grounds:

The Ministry of Environment, Rural Modernisation, Kalinago Upliftment and Constituency Empowerment hereby agrees to make due recommendation to the hikers not to wander away from the marked track when

crossing through the property, not to light any fire, not to leave any rubbish, not to do any camping on the grounds, and to respect cattle and crops, fauna and flora.

Signed and sealed in on:.....20.....

In two original copies, one for each signatory party.

Signed by Landowner,

before and in the presence of

WITNESS

Signed by the Permanent Secretary,

Ministry of Environment, Rural Modernisation,

Kalinago Upliftment and Constituency Empowerment

before and in the presence of

WITNESS

Annex 3. Sample Code of Conduct

EXAMPLE OF CONTRACTOR'S CODE OF CONDUCT **ENVIRONMENTAL, SOCIAL, HEALTH AND SAFETY**

Our Commitment

Our Company is committed to protecting the environment in which we operate and take pride in conducting our business in a safe and responsible manner. We recognise and accept our responsibility to develop our resources with awareness of the environmental, economic and social needs and expectations of stakeholders.

Our Organisation promotes freedom of expression and open communication and we expect all employees to follow our Code of Conduct. All third-party contractors, sub-contractors, consultants and volunteers are also expected to comply with the code as a condition of their engagement with the Organisation.

No operation is considered effective or complete without proper attention to safety and the environment as detailed in our Organisation's Health and Safety Manual (include as Appendix 1). The health and safety of all employees and those visiting the organisation/ work site are of the utmost importance. We are committed to providing and maintaining a working environment that is safe and without risk to health and safety and is committed to complying with all relevant legislative and project requirements.

All parties are expected to demonstrate a high degree of tolerance and respect for all stakeholders associated with the project, including the indigenous and local communities. The guidelines to be followed are set out in the Code of Conduct requirements below and shall apply to all associated project personnel.

Code of Conduct Requirements

This Code of Conduct for the project identifies the behaviour which we require from all project personnel and is aligned with our Organisation's Code of Conduct (add as Appendix). Our workplace is an environment where unsafe, offensive, abusive or violent behaviour will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

In this document the term "child" / "children" means any person(s) under the age of 18 years.

Code of Conduct

Each personnel shall comply with the following:

1. Carry out his/her duties competently, diligently and in accordance with best practice
2. Comply with applicable laws, rules, and regulations of the Country

We will inform our personnel of the applicable legal requirements as identified in the ESMP to ensure that they are aware of the requirements. Each member of our team will be required to familiarise themselves with this document.

3. Compliance with applicable health and safety requirements to protect the local community (including vulnerable and disadvantaged groups), and the Employer's Personnel, including wearing prescribed personal protective equipment [PPE], preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment

It is our duty to ensure that the health and safety requirements are strictly adhered to by all parties. As part of our employment agreement we require that all our personnel must be knowledgeable of our Health and Safety Policy and be informed of the actions required as detailed in the Health and Safety Manual which is in accordance with the ISO 45001. Through our Environmental Specialist, we will assess if any training is required and ensure that this is done. We will also equip all our personnel with the required PPE, and it is mandatory that this be used once on the project site. Safety in workplaces is an uncompromised condition and a mutual and shared responsibility for all our employees.

4. Compliance with environmental requirements identified in the ESMP including erosion control, storm water control, noise and dust control, site cleanliness and disposal of excavated materials and construction wastes
5. Compliance with COVID-19 Prevention Protocols of the Ministry of Health, Wellness and New Health Investment and other national guidance and related protocols

We will remain alert of changing outbreak conditions, locally and regionally, including as they relate to possible community spread or clusters and implement infection prevention measures accordingly. In accordance with OSHA guidelines, our ESHS Experts will periodically assess the hazards to which our personnel and the contractor's workers may be exposed, evaluate the risk of exposure and select, implement, and ensure workers use controls to prevent exposure. All project workers will be trained on the signs and symptoms of COVID-19 and an explanation of how the disease is potentially spread, including the fact that infected people can spread the virus even if they do not have symptoms.

In collaboration with the Project's Safeguards Specialists, we will implement where necessary, standard operating procedures and employee training as it relates to potential exposures. Through our Environmental Safeguards expert, we will ensure to keep updated on all the latest COVID-19 protocols of the Ministry of Health, Wellness and New Health Investments and inform our personnel to ensure these are complied with.

6. Compliance with applicable emergency operating procedures and health and safety requirements

All personnel will be informed of the emergency procedures as prescribed in the project's ESMP and the CESMP which must be strictly complied with.

7. Duty to report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent danger to his/her life or health

Each personnel must assume responsibility for his/ her own health and safety and should report any concerns immediately to the Project Manager/ Site Supervisor, Resident Engineer or ESHS Experts.

8. Respecting reasonable work/ site instructions (including regarding environmental and social norms)

All our personnel are required to be aware of related work/ site instructions and are expected to comply. This is a condition of employment and subject to disciplinary measures if violated.

9. The use of illegal substances

Our Organisation has a zero tolerance for the use of illegal substances - all drugs, alcohol and any controlled substances or medicines. This may result in immediate dismissal if violated. If required, we are prepared to engage the services of a Medical Professional to perform testing for any illegal substances.

10. Sanitation requirements (for example, to ensure workers use specified sanitary facilities provided by their employer and not open areas)

Adequate sanitary facilities and well-equipped hand-washing stations are expected to be provided by the contractor on this project. It is also expected that the contractor will ensure that these facilities are frequently cleaned and sanitised especially given the risks of COVID-19, as a prevention measure. All project personnel, including the contractor's, are required to use these facilities and will be reminded of this should the need arise.

11. Non-Discrimination and respect in dealing with the Indigenous Peoples, the local community (including vulnerable and disadvantaged groups), the Employer's Personnel, the Contractor's Personnel and other related Project Personnel (for example on the basis of family status, ethnicity, race, gender, religion, culture, language, marital status, birth, age, disability, or political conviction)

Our Organisation firmly believes in respect for all and that everyone should be treated fairly. We will ensure that our personnel are aware of the requirements as prescribed in these project documents and abide by them as a condition of employment. We commit to working in close collaboration with all Social Specialists on this project to ensure that there is non-discrimination and respect for all stakeholders on the basis of gender, age, physical or mental disability, race, language, culture, political affiliation, philosophic or religious beliefs or any other reason.

Interactions with community members and any affected persons (for example to convey an attitude of respect and non-discrimination, including to their culture and traditions)

All employees are expected to fulfil their duties with integrity and respect toward customers, stakeholders, and the community. We are committed to the highest social performance standards in a manner that respects the environment, culture and customs of the communities within the area of direct and indirect influence of the project. Any complaints received from communities or stakeholders will be investigated in accordance with the Project's Grievance Redress Mechanism.

12. Sexual harassment (for example to prohibit use of language or behaviour, in particular towards women or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate)
13. Violence, including sexual and/or gender-based violence (for example acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion, and deprivation of liberty)
14. Exploitation including sexual exploitation and abuse (for example the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading behaviour, exploitative behaviour or abuse of power)

Sexual harassment, violence, including gender based, and exploitation are behaviours which are expressly prohibited in our Organisation. These are identified as a form of harassment based on the misuse of power in human relationships and can be defined as behaviours intended to disturb, threaten or upset. Some examples of behaviours associated with these elements are listed in Appendix 1. Any complaints or reports received from communities or stakeholders in this regard will be investigated by our Social Specialist in accordance with the Project's Grievance Redress Mechanism.

15. Protection of children (including prohibitions against abuse, defilement, or otherwise unacceptable behaviour with children, limiting interactions with children, and ensuring their safety in project areas)

The rights of the child shall be protected and any observed or reported cases of infringement will be swiftly investigated and required measures taken if deemed necessary. Our Social Specialist will collaborate with the Ministry of Youth Development and Empowerment, Youth at Risk, Seniors Security and Dominicans with Disabilities; Social Welfare Division in this regard.

The Contractor ESHS Expert should provide training related to the environmental and social aspects of the Contract, including on health and safety matters, sexual exploitation and abuse and sexual harassment

Our ESHS Experts will provide short training sessions and concise information leaflets to assist personnel in being informed of the environmental, social and health and safety aspects of the project.

16. Avoidance of conflicts of interest (such that benefits, contracts, or employment, or any sort of preferential treatment or favours, are not provided to any person with whom there is a financial, family, or personal connection)

Our Company shall deal fairly and lawfully with all our Clients in accordance with our Business Ethics. We expect our employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties. Employees are encouraged to perform self-checks when in doubt or faced with a difficult situation to ensure that decisions are lawful.

17. Avoidance of issues associated with influx of labour, both social and environmental

These issues include many of those identified in this Code, such as sexual exploitation, sexual harassment or gender-based violence. Both our Environmental Specialist and Social Specialist will conduct the requisite monitoring to ensure that these issues are avoided. If any issue should arise or complaint receive, it will be investigated, and the necessary action taken. A report will also be prepared and follow-up done.

18. Protection and proper use of property (for example, to prohibit theft, carelessness or waste)

In accordance with our Organisation's Code each employee must ensure that their actions comply with and are within the meaning and intent of all applicable laws and regulations.

19. Duty to report violations of this Code

Each employee has a duty to report any violations or suspected violations of the code. The person by virtue of this Code will be protected from retaliation. Any reports of violations received will be investigated.

20. Non-retaliation against workers who report violations of the Code, if that report is made in good faith.

Our Organisation is committed to the highest standards of good governance, transparency, honesty, integrity, and accountability. Any of our employees who report unethical conduct or violation of the Code are protected

from reprisal. Any reprisal or attempted reprisal against an employee who makes a report in accordance with the Code is considered to be in breach of the Code of Business Conduct. If any employee should feel that they have been discriminated against as a result of reporting unethical conduct or violation of the Code, there is an opportunity to report the discriminatory actions directly to the Company's Director.

Our Personnel are not allowed to smoke illegal substances (drugs) or make open fire in the Project area, including project's vehicles.

Our Personnel are not allowed to carry firearms, explosives, ammunition, or other arms in the Project Area, including Project's vehicles.

Our personnel are not allowed to have pets in the Project area.

Our personnel are not allowed to fish, hunt or remove vegetation from the Project area or surrounding properties.

Our Personnel are not allowed to use open areas instead of the designated sanitary facilities.

Any damage caused by the Project to any property in the Project Area must be immediately informed to the Representative of the Contractor in the Project.

Implementation of the Code of Conduct

The project requires that implementation of the Code of Conduct detail the measures to ensure that there is compliance, these include how the Code will be:

- Communicated to Personnel
- Introduced into the Conditions of Contract
- Violations will be addressed
- Monitored and Reported for Compliance
- Communicated to Communities in case of concerns

Our ESHS Experts on this project will work in close collaboration with the Project's Environmental Safeguards Specialist and Social Safeguards Specialist to ensure compliance with the Code of Conduct during works.

Communication to Personnel

All employees must be open to communication with their colleagues, supervisors or team members. We promote freedom of expression and open communication, but we expect all employees to follow our Code of Conduct. The Code of Conduct for the project will be provided to each personnel on the project and will also be available in hard copy in the project office.

Our ESHS Specialists will provide short training sessions and concise information leaflets to assist personnel in being informed of the environmental, social and health and safety aspects of the project. Training for workers will include awareness of hazards in the project area, health and safety procedures, emergency response, first-aid, incident reporting and accident prevention. Safety and other ESHS issues will also be

highlighted at tool-box meetings and monthly project meetings by the Project Manager, Resident Engineer and/or ESHS Specialists. ESHS orientation will also be done for new personnel.

Personnel will have an open communication channel through our ESHS Experts or other designated person to be able to ask questions and make recommendations at any time during the project implementation.

Engagement Conditions and Consequences of Code Violations

All our personnel on the Project are personally responsible for ensuring that their behaviour complies with this Code of Conduct. The Code of Conduct is clearly articulated in this document and is written in plain language (English). As part of the conditions of engagement, each employee on this project is expected to sign an agreement indicating that they have:

- Received a copy of the code
- Had the code explained to them
- Acknowledged that adherence to this Code of Conduct is a condition of employment; and
- Understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities

Clarifying queries and obtaining advice – Our personnel may consult with our Compliance Officer if there are any questions or concerns about this Code of Conduct, or if advice is needed. Our Environmental Specialist and Social Specialist on this project will also be available to provide guidance on the Code.

We will take appropriate investigative action where this Code is breached. Our Organisation may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our Code of Conduct. Disciplinary actions will vary depending on the violation. Possible consequences include:

- Reprimand
- Demotion
- Suspension or termination for more serious offenses
- Detraction of benefits for a definite or indefinite period
- Legal action may also be taken

Monitoring and Reporting

If any person observes behaviour that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact [*enter name of the Consultant's Social Safeguard's Expert and Environmental Safeguard's Expert or another individual designated by the Company to handle these matters*] in writing at this address [*insert address*] or by email [*insert email address*] or by telephone at [*insert telephone #*] or in person at [*insert designated location and available times*]

2. Call [*insert telephone #*] to reach the Project’s hotline (*if any*) and leave a message including contact number and brief information of issue
3. Utilise the Project’s Grievance Redress Mechanism (GRM), available via telephone [insert #], in person at the PCU Office [insert address], through the project website [insert web address] or via the GRM App [insert link, if available]

The person’s identity will be kept confidential, unless reporting of the allegation is mandated by law of the Commonwealth of Dominica. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action in collaboration with the Project. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behaviour prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

Responsibility - Overall responsibility for monitoring and reporting lies with our Project Manager/ Site Supervisor, Resident Engineer and Social Specialist and Environmental Specialist or another designated representative on this project. Periodic assessments will be done by these designated personnel to ensure compliance with the Code of Conduct. Review will also be done at least every six (6) months or as may be necessary to ensure the Code remains current.

Reports will be done monthly as part of the project’s progress reporting or immediately if there is an incident. Other reports may be prepared as requested by the Project.

Communication to Communities

In collaboration with the Project’s Social Safeguards Specialist and Environmental Safeguards Specialists we will if required:

- Inform the community of our roles and responsibilities on the project
- Inform the community and stakeholders of the requirements of the Code of Conduct, measures for compliance and our commitment to upholding the Code
- Respond to the concerns and views of stakeholders in a timely and open fashion
- Engage interested parties, when necessary, to discuss our operations and the relationship to affected communities and the environment
- Provide clear and candid environmental information about the operations of the Project and our responsibilities.

Appendix 1

Behaviours Constituting Sexual Exploitation and Abuse and Behaviours Constituting Sexual Harassment

The following non-exhaustive list is intended to illustrate types of prohibited behaviours:

Examples of Sexual Exploitation and Abuse include, but are not limited to:

- Consultant's Personnel tells a member of the community that he/she can get them jobs on the project work site (e.g. cleaning, masonry) in exchange for sex or sexual acts
- Consultant's Personnel says that he can give priority for job considerations to women in exchange for sex
- Consultant's Personnel rapes, or otherwise sexually assaults a member of the community or project stakeholder
- Consultant's Personnel denies a person access to the site unless he/she performs a sexual favour
- Consultant's Personnel tells a person applying for employment under the Contract that he/she will only hire him/her if he/she has sex with him/her

Examples of Sexual Harassment or Sexual Misconduct include, but are not limited to:

- Consultant's Personnel comments on the appearance of another personnel's or community member (either positive or negative) and sexual desirability
- When a Consultant's Personnel complains about comments made by another Consultant's/ Contractor's Personnel on his/her appearance, the other Consultant's/ Contractor's Personnel comment that he/she is "asking for it" because of how he/she dresses
- Unwelcome touching of a Consultant's/ Contractor's or Employer's Personnel or community member by another Consultant's/ Contractor's Personnel
- Consultant's Personnel tells another Consultant's/ Contractor's Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.

FOR CONTRACTOR'S PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [enter name of Contractor's contact person(s) with relevant experience (including for sexual exploitation, abuse and harassment cases) in handling those types of cases] requesting an explanation.

Name of Contractor's Personnel: [insert name]

Signature: _____

Date (day/month/year/): _____

Counter signature of authorized representative of the Contractor:

Signature: _____

Date (day/month/year/): _____

