

**ENVIRONMENTAL AND SOCIAL MANAGEMENT
FRAMEWORK (ESMF)
FOR THE
OECS REGIONAL TOURISM
COMPETITIVENESS PROJECT**

World Bank Project P152117 - October, 2016



ACRONYMS

BMP	Best Management Practice
EA	Environmental Assessment
EC	Environmental Consultant
EIA	Environmental Impact Assessment
ESMF	Environmental and Social Management Framework
EMP	Environmental Management Plan
GoG	Government of Grenada
GoSL	Government of Saint Lucia
GoSVG	Government of Saint Vincent and the Grenadines
GTA	Grenada Tourism Authority
IBRD	International Bank For Reconstruction and Development
IFC	International Finance Corporation
ILO	International Labor Organization
MEAs	Multilateral Environmental Agreements
OECS	Organization of Eastern Caribbean States
OP	Operational Policy
PAP	Project Affected Peoples
PCRMP	Physical Cultural Resources Management Plan
PCU	Project Coordination Unit
PPP	Public Private Partnership
PPU	Physical Planning Unit
PPDB	Physical Planning and Development Board
PSIPMU	Public Sector Investment Project Management Unit
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SA	Social Assessment
SGD	St. Georges Declaration (of Principles for sustainable development in the OECS)
SWMA	Solid Waste Management Authority
TA	Technical Assistance
UNCBD	United Nations Convention on Biological Diversity
UNCCD	United Nations Convention to Combat Desertification
UNFCCC	United Nations Framework Convention on Climate Change
WB	World Bank
WBG	World Bank Group
WTTC	World Travel and Tourism Council

EXECUTIVE SUMMARY

The Governments of Saint Vincent and the Grenadines (GoSVG), Saint Lucia (GoSL), and Grenada (GoG) are collaborating with the World Bank (WB) to implement a Competitiveness Program with the objective to lay the foundation to improve the competitiveness of the tourism sector in the OECS region through (a) increasing tourism spending at selected pilot program locations in each of the participating countries; (b) establishing a strategic approach to tourism development; (c) facilitating the movement of people among participating islands, using existing ferry systems; and (d) supporting better quality of services in the tourism sector.

The program will finance physical infrastructure including the improvement/ rehabilitation of the historic sites of Fort George in Grenada. In Saint Vincent and the Grenadines rehabilitation is planned for historic Fort Charlotte. Works in Saint Lucia will focus on beautification and improvements to the downtown Castries district, including Derek Walcott Square, William Peter Boulevard, possibly the Vigie Lighthouse, Battery Meadows and George V. Park Botanical Gardens, as well as a façade improvement programme and improvements to streets, docks, and walkways in the downtown area to improve visitor mobility.

The sub-project locations have been field-checked by World Bank staff and have been inventoried and assessed in a preliminary form through this ESMF, which includes a top-level Environmental Assessment (EA) to describe the environmental impacts of the project on a program-wide level, and a preliminary screening of potential social risks and impacts. In addition this ESMF includes an EMP with environmental safeguards to guide the implementation of relatively simple works for which no additional assessment would be required. As many of the specific details of the investment works are not yet fully defined, this ESMF also includes general guidelines to screen possible future subprojects, identify potential impacts, develop mitigation plans, and include them into project environmental management. This ESMF also includes criteria to identify sub-projects which require further assessment due to complex or sensitive conditions, such as the restoration of historic Fort George and Fort Charlotte, and provides recommendations for the development of an Environmental Assessment (EA) or Social Assessment (SA), as needed, including a Physical Cultural Resources Management Plan (PCRMP) to guide those activities.

The World Bank Environmental and Social Specialists who contributed to this ESMF recognize, appreciate, and are grateful to the Project Coordination Units (PCUs) in Grenada, Saint Lucia, and Saint Vincent and the Grenadines, that would have helped to develop and coordinate this ESMF.

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1.0 INTRODUCTION

1.1 Project Background

The OECS (Organization of Eastern Caribbean States) is an intergovernmental organization dedicated to economic harmonization and integration, protection of human and legal rights, and the encouragement of good governance between countries and dependencies in the eastern Caribbean region. The main organ of the OECS, the Secretariat, is based in Castries, Saint Lucia. The islands of Saint Lucia, Grenada, and Saint Vincent and the Grenadines are the southernmost members of the OECS and are the subject of this Project (Figure 1).

The Governments of Saint Vincent and the Grenadines (GoSVG), Saint Lucia (GoSL), and Grenada (GoG) are collaborating with the World Bank (WB) to implement a Competitiveness Program with the following objectives: (i) facilitate the movement of tourists within the region using ferries; (ii) improve selected touristic sites; and (iii) strengthen implementation capacity for regional tourism market development.

The program will finance physical infrastructure including the improvement/ rehabilitation of the historic sites of Fort George in Grenada. In Saint Vincent and the Grenadines rehabilitation is planned for historic Fort Charlotte. Works in Saint Lucia will focus on beautification and improvements to the downtown Castries district, including Derek Walcott Square, William Peter Boulevard, and possibly other locations such as the Vigie Lighthouse, Battery Meadows and George V. Park Botanical Gardens, as well as a façade improvement programme and improvements to streets, docks, and walkways in the downtown area to improve visitor mobility.

According to the Bank's Environmental Assessment (EA) Policy (Operational Policy OP 4.01), the OECS Regional Tourism Competitiveness Project is classified as Category B, meaning that environmental impacts for the type of work anticipated under the project are expected to be moderate in nature and can be managed through the application of appropriate engineering and management measures. This ESMF includes a top-level Environmental Assessment (EA) to describe the environmental impacts of the project on a program-wide level, as well as a preliminary screening of potential social risks and impacts associated with the project. In addition, this ESMF includes an EMP with environmental safeguards to guide the implementation of relatively simple works for which no additional assessment would be required. Since many of the specific details of the investment works are not yet fully defined, this ESMF also includes general guidelines to screen possible future subprojects, identify potential impacts, develop mitigation plans, and include them into project environmental and social management. This ESMF also includes criteria to identify sub-projects which require further assessment due to complex or sensitive conditions, such as the restoration of historic Fort George and Fort Charlotte, and provides recommendations for the development of a Physical Cultural Resources Management Plan (PCRMP) to guide those activities.

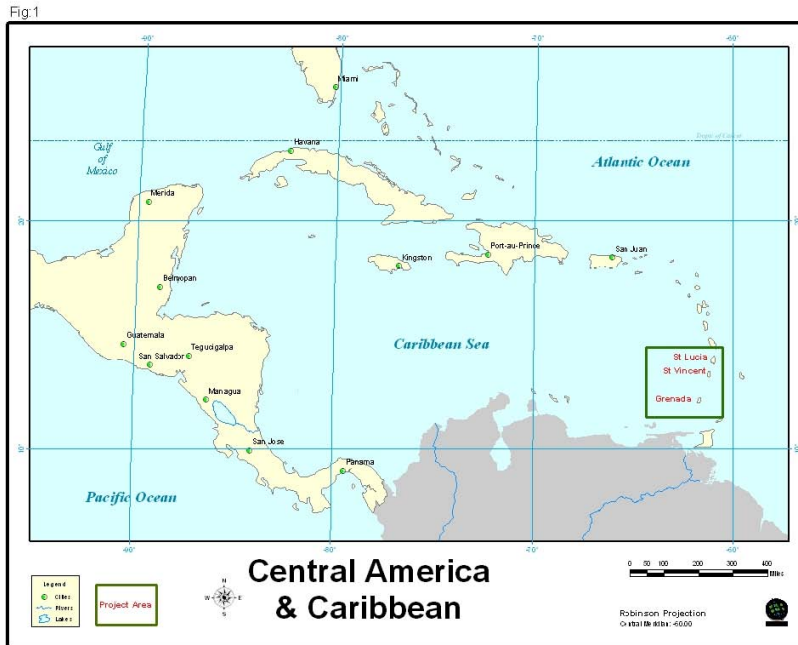


Figure 1. Location Map of St. Lucia, Grenada, and St. Vincent and the Grenadines within the Central America & Caribbean region

1.2 Project Description and List of Subprojects

The Project objectives will be achieved through the following four components:

Component 1: Component 1: Facilitation of the Movement of People (US\$ 2.7M). This component aims to strengthen regional integration and facilitate the movement of people in the region through: (i) support for the development of a single regional space for immigration and customs entry of international tourists; (ii) development of a pilot ferry system through technical assistance, IT and small infrastructure improvements.

Sub-Component 1.1 (country specific) consists of **TAs to develop a single regional space for Immigration and Customs entry of international tourists (US\$ 1.4M).** At national level, this sub-component will provide (i) infrastructure investment (works) to turn domestic terminals into international ones¹, and (ii) provision of goods: scanners and other IT needs for immigration and customs clearance. At regional level, this sub-component will provide TAs to support review of the existing regional immigration system (CARISEC); review of existing OECS Treaty for the creation of a single economic space and identification of potential regulatory and institutional gaps on the free movement of people and goods, including port charges; develop a plan for the implementation of a Schengen Style single space; and transition the region to a common customs

¹ This includes small refurbishing investments in the passenger ferry terminals and the addition of simple facilities including small customs and immigration booth/building and security screening equipment and infrastructure.

and immigration clearance platform for persons, by supporting the region in identifying and agreeing on a common platform².

Sub-Component 1.2 (regional) consists of the **development of a pilot regional ferry corridor (US\$ 1.3M)**. This component will provide gap financing for the operation of the ferries; IT support for information technology software and hardware required for a centralized ferry scheduling system; TA to review technical standards and enforcement for water transport, including safety standards; and TA to support the dialogue between the governments and the ferry operators.

Component 2: Pilot Tourism Investments (US\$ 18.5M). The planned investment in signature attractions for each OECS island is an essential step in the strengthening of the competitiveness of tourism in the region. The selected pilot tourism products for each country are: (i) the rehabilitation of Fort George, as part of the development of a tourism product around the Carenage area in Grenada; (ii) reinforcement of the marine-based tourism product offering in St. Vincent and the Grenadines, and rehabilitation of Fort Charlotte on the mainland; and (iii) enhancement and beautification of Castries City waterfront in St. Lucia³.

As a first step, this country-specific component will finance a number of technical assistance interventions to support the anchor tourism products, including feasibility studies, technical, engineering, social and environmental assessments, as well as rehabilitation designs; and marketing, business, commercialization and management plans for investments identified. The second step would include the following works and technical assistance:

- **St. Vincent and the Grenadines – (i) *Improve the competitiveness of its flagship Marine-Based Tourism sector through development and implementation of a Marine Tourism Festival; upgrading anchorage site infrastructure: Investments include safety and security, waste collection and management, facilities, equipment, boats and training (for Police, coast guard, rangers and guards), upgrades to walkways, signage, in pilot sites in SVG; and, TA by supporting preparatory studies for the SVG Marine Training Institute, STWC training⁴; and, (ii) *Limited rehabilitation of Fort Charlotte.**** Support for infrastructure investment and goods would include an interpretation center, roof repair, cafeteria, vending space, wall repair, a car park, access, and minor repairs of a bridge to the site. TA to craftsmen on selection and display of products they offer to tourists would also be provided.
- **Saint Lucia - The strengthening of a Castries City Tourism product including (i) *Infrastructure and institutional support for improved urban mobility in Castries through technical assistance, civil works and provision of goods, including works in reconstruction of the intersection of Jeremie Street and Compton Highway;***

² The implementation of the common platform, including any hardware and software that may be required could be implemented through additional financing under this Project.

³ For reasons why these sites were selected, please see background paper titled “World Bank OECS Regional Tourism Competitiveness Project: Tourism Site Development and PPP Options”.

⁴ The implementation of this study could be supported through additional financing under this Project.

works to support the organization of pedestrian and taxi movements near La Place Carenage; works to support improvements of sidewalks in other key parts of town; works and goods to support replacement of all other traffic lights and improvements of junction; and TA for institutional strengthening; (ii) *Urban and tourism development, including of sites and attractions in Castries*, including for works related to the upgrading the market and surrounding area; works and goods for improving visitor experience walking through downtown Castries and Boulevard area (signage, strategically located maps, interactive visitor kiosks with information on events, historic relevance, tours, interpretation facilities, benches, rest areas, cleanliness including additional waste bins and recycling, safety and security upgrades including additional lighting); Façade improvement programme; Works related to the upgrading of the botanical gardens (landscaping, fence repair, lighting, benches, trash cans); TA for the vendors in the market regarding how to showcase goods, alternate goods to consider, etc.; and, (iii) *Improving the business environment* through Improving the process of starting the business through TA for supporting regulatory changes and IT support for implementing a system of unique identifier; Improving the process of obtaining construction permits through TA for creating a single window for construction permits and IT support for implementing a single window; Strengthening the protection of minority shareholders through TA for supporting the drafting of legislation; Improving the process of registering property through TA for supporting the modernization of the land registry, including associated regulatory reforms, and IT support for implementing a modern property registry; Linking the relevant registries: TA to support the linking of the relevant registries, including associated regulatory reforms (e.g. collateral registry, business registry, motor vehicle registry, etc.), and IT support for the linking of the relevant registries; and Populating the new registries with data from the previously existing registries through TA to support the transfer the data (including the collateral registry, new property registry, business registry).

- **Grenada** - rehabilitation of *Fort George historic site* (repairs and cleanup of Eastern barracks and adjacent building of the Fort, development of an interactive interpretation center, coffee and gift shops, signage, vending booths, parking lot, washrooms)⁵. TA to craftsmen on selection and display of products that they offer to tourists would also be provided. Support for infrastructure and works would include a roof on the East Barracks; stone work and masonry on the ground floor; internal timber frames, windows, and doors; an interpretation center; displays, railings, walkways, and signage; gift shop and coffee shop; parking lay by; rampart repair and general cleanup.

- **Component 4: Project Implementation Support (US\$2.0M).** This country-specific component aims to support the overall implementation of the project. It will provide TA,

⁵ It is critical to ensure that the Police Headquarters is moved out of the Fort before the rehabilitation work could start. A government policy to move the Police HQ has already been approved by the Cabinet and a location to move the HQ identified. The government expects to support this move with financing from the Caribbean Development Bank.

training and logistical support (as the case may be, office equipment and/or software) to support: (i) capacity-building/staffing of the existing Project Coordination Units (PCUs) on project management, procurement, financial management, safeguards, Monitoring and Evaluation (M&E) and technical expertise in each OECS member country as needed, during the execution of the project; (ii) M&E of project's results, including performance indicators; (iii) consulting services for project audit in each country; (iv) other operating costs that would be defined prior to Appraisal.

2.0 LEGAL AND REGULATORY FRAMEWORK

2.1 National Laws

All the islands within the study area have ratified several international environmental Agreements and Conventions and by their signature of the St. Georges Declaration (SDG) of 2001 have committed themselves to the Principles for Environmental Sustainability in the Organization of the Eastern Caribbean States (OECS). They all have in place several pieces of legislation and institutions to protect their environments; some of those legislations were originally enacted in the 1940's and amended in recent times.

The legal and institutional framework for environmental management in those islands have been influenced by Government's policies over the years and to a great extent, the policies of some donor agencies and regional and international agencies like the World Bank, Caribbean Development Bank (CDB) the Organization of East Caribbean States and the United Nations. Their main focus has been on the protection of sensitive and important natural resources, protection of public health and safety, and the encouragement of appropriate and feasible macroeconomic and sectoral policies, which promote sound environmental and natural resource management principles and practices. Such policies impact positively on a wide range of resources and issues that are of great importance to their economic development and the welfare of the society in general. Some of those resources and issues include the forest, mangrove swamps, marine ecosystems, historic buildings and sites, sustainable land use, wildlife protection, pollution abatement, solid waste management and waste disposal.

Another commonality among OECS national law systems is the EIA process, which is typically controlled by the Physical Planning Department (or Development Authority) in each country. Set categories of project types deemed of potentially high impact are required to prepare an EIA, for which the terms of reference are provided by the relevant Department or Authority. Once prepared the EIA is circulated to a number of referral agencies which are made up of some of the other agencies and statutory bodies with some responsibility for environmental management, to approve or make additional recommendations if necessary.

All development projects including commercial buildings, apartments, hotels, industrial building, residential or commercial subdivisions with civil works such as roads, drains, retaining walls, must submit their plans to the Physical Planning Department (or Development Authority) for approval before works can commence. This is to ensure integrity in the designs as well as orderliness of the development in keeping with the national vision. For all activities in the Project, the requirements of the relevant Physical Planning Department (or Development Authority) must be followed, as well as all laws and regulations pertaining to environmental protection in Saint Vincent and the Grenadines, Saint Lucia, or Grenada.

A more complete discussion of the regulatory frameworks of each OECS country is provided in Appendix 1.

2.2 World Bank Safeguard Policies

The World Bank projects and activities are governed by Operational Policies (OP), which are designed to ensure that the projects are economically, financially, socially and environmentally sound.⁶ The Bank has specific safeguard policies, which include Environmental and Social Assessments and policies designed to prevent unintended adverse effects on third parties, Project Affected Peoples (PAP) and the environment. These specific safeguard policies address natural habitats, pest management, cultural property, involuntary resettlement, indigenous peoples, safety of dams, projects on international waterways and projects in disputed areas⁷.

The World Bank's environmental and social assessment policy and recommended processing are used to identify, avoid, and mitigate the potential negative environmental and social impacts associated with Bank lending operations and are described in the Bank's **Operational Policy (OP)/Bank Procedure (BP) 4.01: Environmental Assessment**. This policy is considered to be the umbrella policy for the Bank's environmental 'safeguard policies' which among others include: Natural Habitats (OP 4.04), Forests (OP 4.36), Pest Management (OP 4.09), Physical Cultural Resources (OP 4.11), Safety of Dams (OP 4.37), Indigenous Peoples (OP 4.10) and Involuntary Resettlement (OP 4.12).

Under OP4.01 the Bank will undertake **environmental and social screening** of each proposed project to determine the appropriate extent and type of environmental and social assessment required. Proposed projects are classified into one of four categories, depending on the type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts. The categories of potential environmental impacts are classified as A, B, C and FI, as described in Table 2 below:

Table 1: World Bank project categories

Category	Description
Category A	Category A project is likely to have significant adverse environmental impacts that are sensitive, diverse, or unprecedented. These impacts may affect an area broader than the sites or facilities subject to physical works. The EA for Category A project examines the project's potential negative and positive environmental impacts, compares them with those of feasible alternatives (including the "without project" scenario), and recommends any measures needed to prevent, minimise, mitigate, or compensate for adverse impacts and improve environmental performance. For Category A project, a borrower is responsible for preparing an Environmental Impact Assessment (or a suitably comprehensive regional or sectoral EA).
Category B	Category B project has potential adverse environmental impacts on human populations or environmentally important areas, including wetlands, forests,

⁶Source:<http://www.worldbank.org/opmanual>

⁷Source:<http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTSAFEPOL/0,,contentMDK:20507440~pagePK:64168427~piPK:64168435~theSitePK:584435,00.html>

	grasslands, and other natural habitats - which are less adverse than those of Category A projects. These impacts are site specific; few if any of them are irreversible; and in most cases mitigation measures can be designed more readily than for Category A projects.
Category C	Category C project is likely to have minimal or no adverse environmental impacts. Beyond screening, no further EA action is required.
Category FI	Category F or FI project involves investment of Bank funds through a financial intermediary, in subprojects that may result in adverse environmental impacts.

After review of the project and its components, the overall OECS Regional Tourism Competitiveness Project has not been deemed to have any major negative environmental impacts but because of the presence of the civil works with minor to moderate impacts, the project has been classified as a **Category B project**. The implementation of appropriate mitigation and management measures will assist in reducing any potential negative impacts from the various project components.

The World Bank Safeguard Policy OP 4.01 for Environmental Assessment (EA) is triggered, and requires that an Environmental and Social Management Framework (ESMF) be prepared along with an Environmental Management Plan (EMP) to guide recommended measures. Four other World Bank Safeguard Policies dealing with natural habitats, physical cultural resources, pest management, and involuntary resettlement are also triggered by the Project, and are briefly described below⁸:

- Operational Policy 4.04 on Natural Habitats seeks to ensure that World Bank-supported infrastructure and other development projects take into account the conservation of biodiversity, as well as the numerous environmental services and products which natural habitats provide to human society. The policy strictly limits the circumstances under which any Bank-supported project can damage natural habitats (land and water areas where most of the native plant and animal species are still present). This policy was triggered as a precaution to ensure that any affected natural habitats are adequately protected, because some of the project sites may take place within parks or protected areas.
- The objective of OP/BP 4.11 on Physical Cultural Resources is to avoid, or mitigate, adverse impacts on cultural resources from development projects that the World Bank finances. Cultural resources are important as sources of valuable historical and scientific information, as assets for economic and social development, and as integral parts of a people's cultural identity and practices. The fort restoration and rehabilitation works envisioned under the Project would clearly affect these important historical resources, triggering the policy. A Physical Cultural Resources Management Plan (PCRMP) will need to be prepared as part of the EMP to ensure that these resources are not damaged.
- Operational Policy 4.09 on Pest Management seeks to ensure that rural development and health sector projects avoid using harmful pesticides. It is possible that minor, incidental

⁸Source: <http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTSAFEPOL/0..contentMDK:20543943~menuPK:1286597~pagePK:64168445~piPK:64168309~theSitePK:584435,00.html>

use of pesticides may also occur under the Project in the treatment of foundations for termites, or in extermination or fumigation of structures as part of rehabilitation or maintenance. The Bank requires that any pesticide it finances be manufactured, packaged, labelled, handled, stored, disposed of, and applied according to standards acceptable to the Bank. The Bank does not finance formulated products that fall in WHO classes IA and IB, or formulations of products in Class II, if (a) the country lacks restrictions on their distribution and use; or (b) they are likely to be used by, or be accessible to, lay personnel, farmers, or others without training, equipment, and facilities to handle, store, and apply these products properly. This policy has been triggered as a precaution, to allow pesticides to be used as part of the Project in minor quantities. The EMP specifies that such use must be made by a licensed and registered professional contractor, trained and skilled. The ESMF screening procedures specify that any significant use or purchase of pesticides is excluded and ineligible under the Project.

- Operational Policy 4.12 on Involuntary Resettlement seeks to prevent severe long-term hardship, impoverishment, and environmental damage to the affected peoples during involuntary resettlement. The overall objectives of the Bank's policy on involuntary resettlement are the following: (a) Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs. (b) Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable the persons displaced by the project to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs. (c) Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher. The purpose of the Resettlement Policy Framework (RPF) is to clarify resettlement principles, organizational arrangements, and design criteria to be applied to subprojects. For operations that may involve involuntary resettlement, the Bank requires that the Borrower screens subprojects to ensure their consistency with OP 4.12. The RPF is to be submitted by the Borrower, prior to appraisal, conforming to the policy, and is attached as Annex 5 of this ESMF.

2.3 Environmental and Social Management Capacities

Within each OECS country the duties of environmental and social risk management are shared by several agencies or entities. The various management agencies operate under legislation that attempts to guide them but the issues of overlapping and sometimes unclear responsibilities continue to plague effective operations and responses to a number of environmental and social risk management issues. For example, in some coastal development projects, jurisdiction is shared by the Fisheries Authority, the Forestry Department and the Physical Planning Department. These forms of overlap along with lack of adequately trained staff, technical and financial resources coupled with absence of concerted, coordinated, cooperative efforts by the various agencies have contributed to limitations in environmental management. Such limitations coupled with agencies heavy workloads and deadlines make it difficult if not impossible for them

to single-handedly contribute to monitoring and ensuring environmental and social safeguards as prescribed.

A separate Environment Department is often charged with coordination of higher level initiatives, such as planning and policy efforts, or providing technical support in the review of EIAs. Here it is worth noting that there is a dormant cabinet appointed multidisciplinary team called the National Environment Advisory Board that has a mandate to ensure environmental safeguards for SVG. In Saint Lucia the Ministry of Public Service, Sustainable Development, Energy, Science and Technology is the government body responsible for the following-up of the international commitments signed by Saint Lucia related with environmental issues, including the Climate Change Convention (UNFCCC). The Sustainable Development, Energy, Science and Technology Section oversees all matters relating to sustainable development within the country and ensure that the various protocols are adhered to. It is the lead environmental agency in the country and spearheads the National Environmental Policy (NEP), National environmental Management strategy (NEMS), the national Climate Change Committee (NCCC), and other initiatives related to biodiversity, marine and terrestrial pollution, energy efficiency, sustainable development and environment.

In practice the beneficiary agencies (e.g. Education, Housing, Fisheries, and Transport) must play a role in ensuring that environmental and social safeguards are incorporated into their projects. Typically, the ministries of Public Works or Infrastructure are charged with oversight and supervision of larger projects. Works contracts must include environmental and social provisions, and often a separate Design and Supervision Consultant is selected to prepare the detailed design and include the relevant environmental and social mitigation measures. The World Bank's primary contact point with OECS governments on environmental and social matters is the Project Coordination Units (PCU) which are typically based in the Ministry of Finance. The PCU's responsibility is primarily of a fiduciary and safeguards nature, as the manager of funds for the Project. The PCUs release contracts for the various works that include the relevant mitigation measures, as specified in this ESMF. Supervision and oversight of the works to ensure compliance is ultimately the responsibility of the PCU, but in practice it is shared by the Design & Supervision Consultant, the beneficiary Agency, and for larger projects, a separate implementing agency (e.g. Public Works).

To ensure that environmental requirements are tracked and managed, the PCUs have each designated a safeguards point of contact, typically an engineer with shared responsibilities to beneficiary or implementing agencies. This capacity is supported by the hiring of external Consultants as needed for specific project needs. Primary responsibility for the implementation of social safeguards policies also lies with the PCUs. Screening of sub-project sites for potential social risks and impacts, and subsequent development and implementation of related mitigation measures, is undertaken by the Social Development Specialist(s) within the Project Coordination Unit of each borrower country.

3.0 DESCRIPTION OF EXISTING ENVIRONMENT

The OECS countries share many common characteristics of topography, geology, ecology, water resources, history and demographics. This chapter of the ESMF provides a brief summary of physical and social conditions in the region.

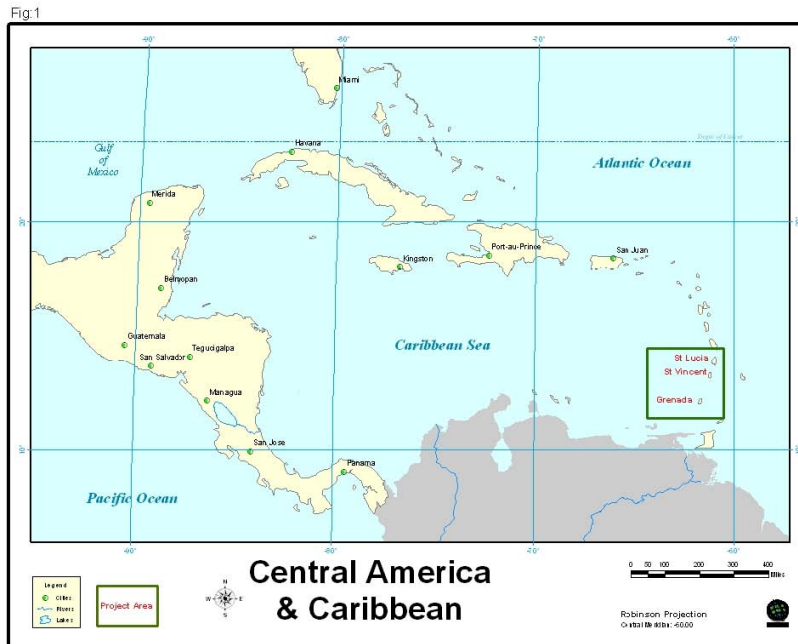
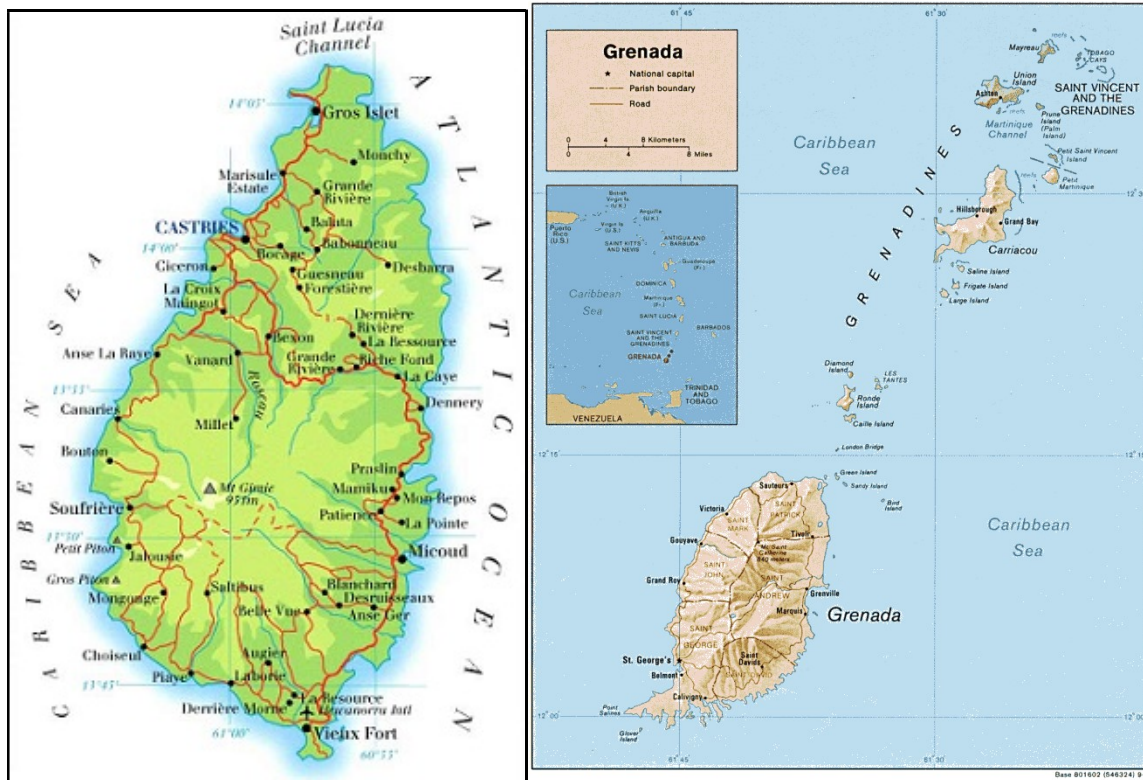


Figure 1. Location Map of Grenada, Saint Lucia, Saint Vincent and the Grenadines, within Central America & Caribbean region

3.1 Physical Environment

Saint Vincent and the Grenadines consists of a main island and a chain of 32 islands and cays, approximately 389 km² (150 square miles) in area. Saint Lucia is located between Saint Vincent to the south and Martinique to the north in the Caribbean Sea bordering the Atlantic Ocean and is approximately 616.4km²(238 square miles) in area. Grenada, which includes the inhabited islands of Grenada, Carriacou, and Petite Martinique to the northeast, has an area of 344 sq km (131 sq mi) and a coastline of 121 km.

All are archipelagic state in the Eastern Caribbean (Figure 1) of volcanic origin, formed by the active tectonic process of crustal subduction which creates deep ocean trenches and steep coastal mountain ranges. Volcanic ash has created rich and fertile soils which support lush vegetation. Apart from recent alluvial deposits such as river and beach sands, and a few outcrops of sedimentary and marine deposits such as limestone and coral, only igneous rocks are found on most parts of the islands.



Figures 2a-2b. Maps of Saint Lucia, Saint Vincent and the Grenadines and Grenada

The islands each have a central axial range of mountains running north-south, with steep topography and a narrow coastal belt and limited flat land area. Relief is pronounced with the highest peaks exceeding elevations of 4,000 feet in Saint Vincent, 3,100 feet in Saint Lucia, and 2,700 feet in Grenada (Figures 2a-2b). The volcanic mountains divide the islands between an eastern or windward side and a western or leeward side. Rain shadow effects distribute the rainfall across the islands with drier conditions in the southern and western parts of the islands, while the orographic effect creates a steep precipitation gradient from the coast to the highlands. In Saint Lucia, annual rainfall ranges from over 250 inches in the wet central mountainous interior to below 60 inches in the dry coastal locations; Grenada is somewhat drier with maximum rainfall exceeding 160 inches in the highlands. Watersheds tend to be steep, narrow, and prone to flash flooding from extreme rainfall events that include hurricanes and tropical depressions or troughs. Rainfall is bimodal with a wet season from June to November, with most precipitation occurring in the tropical storm season (Figure 3).

The OECS countries are vulnerable to a number of natural hazards such as hurricanes, earthquakes, volcanic activity, drought, tsunamis, flooding, and landslides. The effects of these phenomena can be exacerbated by the activities of population such as deforestation, indiscriminate garbage disposal, poor building practices, and unplanned settlements in environmentally sensitive areas. Periodic droughts also place tremendous strain on local and national water supplies, especially combined with high sedimentation rates often exacerbated by watershed erosion which clog water intakes and reservoirs. Periodic heavy rainfall events cause

major disasters from landslides, debris flows, river floods, causing major damage to infrastructure, major roadways and settlements, resulting in loss of life and property. Seismic and volcanic hazards are appreciable and vary from island to island; the Soufriere in Saint Vincent is considered the region’s most active volcano, erupting twice over the last century and causing fatalities and displacement of populations. Coastal zones are also vulnerable to storm surge during hurricanes typically ranging from 2 to 5 meters. The windward (eastern) sides of the islands are exposed to long-fetch waves across thousands of miles of open Atlantic Ocean, and consequently there are numerous erosion “hot spots” vulnerable to wave energy. Tsunamis also pose a hazard in the Eastern Caribbean and can be caused by earthquakes, by avalanches off the side of La Soufriere or other volcanoes (Le Friant and others, 2009), and by eruptions of volcanoes particularly those lying on the seafloor such as Kick-em Jenny near Grenada, which could result in a 2-meter tsunami arriving at St. Vincent within 15 minutes of eruption (Gibbs, 2001).

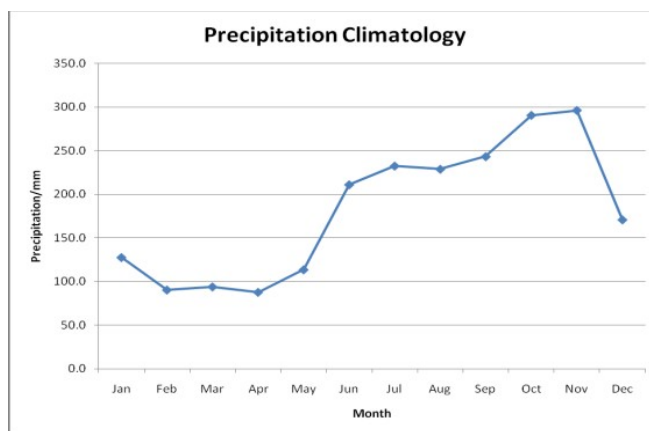


Figure 3. Mean annual monthly rainfall for Saint Vincent (ET Joshua Airport 1987 -2008). Units are mm/month.

3.2 Biological Resources and Land Use

The natural vegetation of the OECS countries exists in several stages of development and/or disturbance caused by human and natural (volcanic) interventions, and is therefore defined by a climax vegetation formation based on environmental gradients. The concentric variations of rainfall with elevation also give rise to concentric variations in vegetation. The physical and environmental conditions of rainfall, soils, elevation, terrain, and exposure to the trade winds, results in a remarkable diversity of eco-systems and forest types, including elfin woodland on high mountain summits, rain forest and palm brakes on slopes and along valleys, deciduous seasonal forests and cactus scrub on lowlands, and littoral woodlands, mangrove and swamps on the coasts.

Ecosystems in OECS countries are highly diverse, with more than 1,000 species of flowering plants, more than 150 species of ferns, and more than 100 species of birds. Table 2 provides a summary of endemism and biodiversity in Grenada. Forests are key to biodiversity, in some cases exhibiting more than 100 species of trees per hectare. Endemism is high, with a number of

ground-dwelling amphibians and reptiles unique to each island; the parrots in Saint Lucia and Saint Vincent are also endemic to each island and are cherished as representative of national identity.

Table 2. Endemism and Biodiversity in Grenada

Resource	No. of species	No. of endemics
Plants	Approximately 2000	3
Amphibians	4	0
Reptiles, Snakes, Lizards	5 8	1 0
Birds	Approximately 150	-18 threatened 1(+1 sub-species)
Marine and Brackish Water fauna	233 and 69 respectively	
Freshwater fauna	17	
Mammals (indigenous)	4	0

Source: ICPB 1988

Grenada has a forest area of 15,000 hectares, about half of the three island's 33,669 hectares total land area. The mountainous forest lands have been set aside as Forest Reserve or National Park land to various degrees. Deforestation is a common challenge and caused serious damage to many watershed areas during the heyday of banana cultivation. Clandestine cultivation of ganja may occur in the roughest mountainous areas of some of the islands, and is an emerging major cause of deforestation and land degradation. Protected areas in Grenada and Saint Vincent are shown in Figure 4a and 4b, respectively.

3.3 Socio-economy and Human Settlement

The Eastern Caribbean islands were originally populated by Amerindian peoples, known as Kalinago (Carib) and Arawak Indians. The Spanish arrived in 1498 and built secure harbour locations which attracted traders and some French settlers during the 16th century. The British fought for control of the islands and by the late 18th century the area was under British rule.

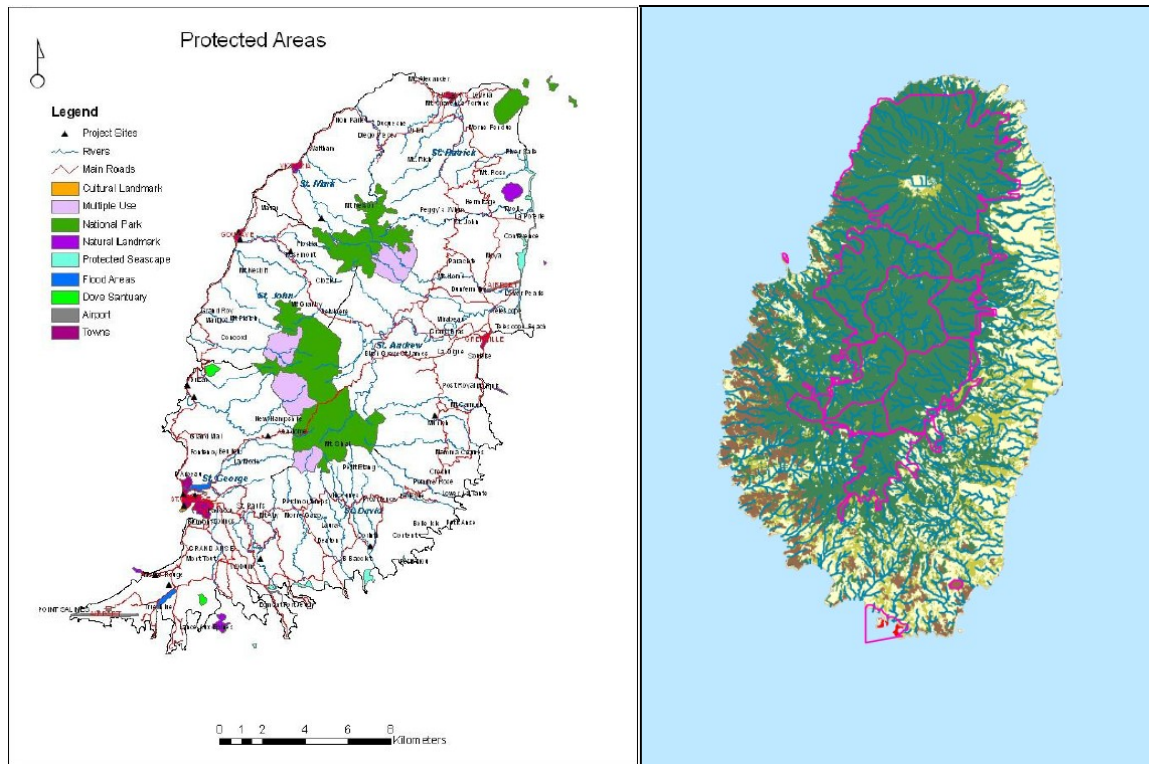


Figure 4a, 4b. Map of Protected Areas in Grenada (left) and Saint Vincent (right).

As of 2012, Saint Vincent and the Grenadines had approximately 108,570 inhabitants, Saint Lucia had approximately 169,000 inhabitants, and Grenada had about 106,000. Historical settlement patterns have followed along flat coastal areas near major rivers or fishing banks. The population of Saint Vincent and the Grenadines is concentrated in the south of the island, particularly in Kingstown and Calliaqua and their suburbs. The population of St. Lucia is concentrated in the north of the island, particularly the northwestern and northeastern part which includes Castries, Gros Islet, and Babonneau, in what is now referred to as the Northwest Urban Corridor. In Saint Lucia and mainland Saint Vincent, as the population has increased the settlement pattern has slowly crept up from the low lying urban areas into the surrounding hillsides creating expanding suburban settlements. Many of these settlements are unplanned. This urban sprawl is largely the result of rural urban migration. Lower income households generally reside in some of these areas on the hillsides, and coupled with inadequate drainage and unplanned sewage systems and services, find themselves vulnerable to landslides and exposures to hurricanes.

In the Easter Caribbean, much of the population (90% or more) is of African descent, while the remainder is a combination of East Indian, European and indigenous people. St. Vincent and the Grenadines is internationally classified as a lower-middle-income country. The economic development is structured around the agriculture, tourism and international business services sectors. The Gross Domestic Product (GDP) per capita (2008) is US\$5,515; the literacy rate is 96% and the life expectancy at birth is 74 years. In 2009, the overall Human Development Index (HDI) Value is 0.772 and the country is ranked 91st in terms of HDI. Grenada's economy is

structured mainly around the tourism and agriculture sectors, with a GDP of US\$8577.61 per capita at market value (2014); and an HDI of 0.77. The life expectancy is 76 years for females and 71 years for males; and the literacy rate is 97%. The country is classified as an upper middle class income country by the World Bank.

In recent decades the economy of the Eastern Caribbean is increasingly dominated by tourism. In Saint Vincent in 2004 the number of stop over tourists reached 86,700 with tourism receipts totaling US\$95.6 million. Due to the contraction of the agricultural sector, the tourism sector is now making a greater contribution to national development with direct investment and ancillary development in support service sectors. This trend is anticipated to increase as national development policy seeks to place the hospitality sector within the main engines of economic growth.

3.4 Physical Cultural Resources

The rich culture and history of the Eastern Caribbean have created physical cultural resources, which are features or objects of interest and value to the nation's people because of their archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. These may include artefacts, objects, sites, structures, groups of structures, and natural features and landscapes, and may be located in urban or rural settings, above or below ground, or under water. Cultural resources are important as sources of valuable historical and scientific information, as assets for economic and social development, and as integral parts of a people's cultural identity and practices. Recognition of physical cultural resources may be at the local, national level, or within the international community.

National treasures in the Eastern Caribbean typically include the Botanic Gardens, which have a rich heritage and longevity, being some of the largest and oldest in the western hemisphere. Petroglyphs are found in numerous locations (e.g. Layou in Saint Vincent). Marine Preserves like the Tobago Cays in Saint Vincent are also of international renown, as are forest trails in the mountainous interiors of the Eastern Caribbean islands.

Historical buildings, antiquated Catholic Churches, and old cemeteries are typically features of community importance or international renown, often featuring excellent stonemasonry work and architectural style. Fort Charlotte also ranks as one of the key historic centerpoints on the island of Saint Vincent, and in Grenada, Fort George occupies this position. In downtown Castries, Saint Lucia, there are a number of historic parks, buildings and lighthouses, which are community treasures. Relicts of forts or plantations, shipwrecks may have great local or international value, thus meriting attention and preservation.

4.0 PROJECTED IMPACTS

The following discussion of impacts relate to the activities proposed on the respective sites under consideration. In many cases the works are small in scale and any potential impacts are generally minor; however, works in historic or cultural sites or within designated parks or natural areas could potentially have significant impacts, as could works that lead to private land acquisition, physical or economic displacement, and will therefore require additional care and assessment to develop detailed mitigation plans.

4.1 Summary of Project Activities

In Saint Vincent and the Grenadines, the main physical investments on the mainland would involve Fort Charlotte site and upgrades to anchorage site infrastructure to enhance competitiveness of a flagship Marine-based Tourism sector. Fort Charlotte is difficult to access across a one-lane narrow bridge, and it holds enormous potential touristic interest. Large areas of the fort complex are not yet restored including army barracks, a prison and gallows. Access is difficult and although close to the centre of Kingstown, the Fort is underutilized. Environmental management of restoration and access works would focus on community consultation of historic resources, and minimizing footprint for any enhancement of access. Trail development and ecotourism also have high potential on adjacent lands, as they may represent natural habitat with scenic vistas.

Other activities across the OECS include the creation of a pilot ferry system, which may involve coastal works (jetties, terminals, and mooring plans) that may affect ecologically sensitive coastal zones and natural habitat. For example, restoration of jetties in Carriacou or other areas could be considered under the Project. Marine traffic and safety will be improved through a TA, and good environmental and social practice should also be included in this analysis. Finally, some of the proposed works will be carried out in ecologically sensitive areas or protected areas, such as, the Tobago Cays Marine Park in the Grenadines, which could be negatively impacted by increased tourism unless adequate provisions are taken.

In Saint Lucia the chief potential infrastructure investments are related to beautification of the downtown Castries area. One of the chief components is the “ring road” which connects the cruise ship harbor with downtown Castries. The ring road was perused by taxi and on foot to get a sense of the difficulties and obstacles faced by tourists working their way from the harbor to the market and through the downtown area. Much of the ring road is under construction and barricades are common, as well as temporary steel plates covering drains and hazardous footing (see Photo Annex). Parks in downtown Castries are difficult to locate on foot and would offer respite from the heat and welcome shade if more accessible. The downtown traverse was conducted in mid-day as two cruise ships were docked and foot traffic was substantial. Environmental aspects would focus on public safety and harmonization with flood works, as well as consideration of disability access.

Investments at the Botanical Garden in Saint Lucia could involve an aviary upgrade for the endangered parrot species, which could serve to showcase this flagship species. Protection of habitat for these endemic and charismatic birds would form a focal point for conservation efforts, as is the case with the Saint Lucian parrot. The Botanical Gardens serves as a venue for weddings, social gatherings, and high profile events, so the conservation aspects of investment in this area could be widely communicated, far reaching and effective.

In Grenada the main physical works will revolve around Fort George, which has a pivotal role in the conservation efforts of the historic town of St. George and the Carenage area. The project must be in harmony with the goals of the urban redevelopment in the Carenage area and the historic districts, including the Fort, as expressed in the conservation guidelines and the World Bank proposal for rehabilitation of the fort. The cultural landscape and the scale of the potential effects of the intervention include effects on a UNESCO nomination (Lesterhuis, 2004). The East Barracks is in a critically central area, and its restoration plans must be carefully harmonized with other development and restoration plans. It is concluded that there is a need to perform an EA on this project and develop a PCRMP (physical cultural resource management plan) that involves extensive public participation to develop the detailed scope.

4.2 Summary of Potential Impacts

An initial assessment of the types of potential negative impacts, and their degree or significance, is provided in Table 3 below.

Table 3. Summary of Potential Impacts of Sub-Projects

Activity/Sub-Project	Type of Potential Impacts *	Degree of Potential Negative Impacts
GRE: Fort George restoration	Physical Cultural Resources, EHS	Moderate to High
GRE: Carriacou Jetty	Natural Habitat, EHS	Moderate
SVG: Fort Charlotte restoration	Physical Cultural Resources, EHS, Involuntary Resettlement	Moderate to High
SVG: Upgrades to anchorage site infrastructure	Involuntary Resettlement (temporary or permanent land acquisition and/or economic displacement)	Low to Moderate
SLU: Lighthouse & Park rehabilitation	Physical Cultural Resources, EHS	Moderate
SLU: Downtown restoration	EHS, Involuntary Resettlement (temporary or permanent land acquisition and/or economic displacement)	Low to Moderate
SLU: Botanical Gardens	Natural Habitat, Physical Cultural Resources, EHS	Low to Moderate
OECS: Pilot Ferry	Natural Habitat, EHS	Low to Moderate

* Note, EHS = environment, health and safety impacts.

Table 3 above indicates that the restoration activities of Fort George and Fort Charlotte have the highest potential negative impacts, because these activities may negatively impact these critical physical cultural resources, which are of historic, touristic, and national significance. While private land acquisition is not anticipated for upgrade works that take place on the existing footprint of these Forts, final designs have not yet been developed, and upgrades and/or widening of the road leading to Fort Charlotte may be required to accommodate the passage of some tourist buses, and these activities may lead to permanent or temporary private land acquisition. If undertaken, the restoration of the lighthouse and parks in Saint Lucia also has potential to negatively affect these physical cultural resources, though not to the same degree as the larger fort restoration efforts. Physical cultural resources may also be affected in works at the Botanical Gardens in Saint Lucia..

Potentially significant negative impacts to natural habitat may also occur from activities in Carriacou and the Tobago Cays. Coastal and marine resources may be negatively affected from poor design of docks or jetties that can cause changes in currents or beach erosion, or poor management of construction resulting in spills, inadvertent clearing of lands or dredging of coastal zones. Such impacts can occur from spillage of construction materials or chemicals such as cement or oils, from suspended sediments in the water, or from altering the shoreline or coastline configuration such that tidal or water currents are changed to create new areas of erosion or new areas where sediments may be deposited. Natural habitat may also be affected in works at the Botanical Gardens in Saint Lucia.

All the works may also carry negative impacts to environment, health and safety during the execution of the civil works, typically during construction. These types of small civil works generally carry associated impacts which are minor and of short duration.

4.3 Positive and Negative Potential Impacts

There are both positive and negative impacts attendant to the project and its components. This section of the ESMF provides a detailed discussion of the impacts so that the mitigation measures can be designed to optimize the positive impacts and reduce the negative impacts. The impacts indicated above will be reduced and mitigated as described in Section 5 of this ESMF.

4.3.1 Positive Impacts

There are several potential positive impacts of the project and associated works. The positive impacts are expected to be significant and associated with the potential economic growth and development likely to occur as a result of the improvement in tourism services such as increased income and employment opportunities, improvement in the quality and standard of living. The respective local communities should also benefit from employment and income-generating opportunities created during the implementation of the project. This is a significant and major impact. There will be an opportunity to ensure accessibility for physically disabled individuals via the installation of ramps and other measures as necessary at subproject sites undergoing infrastructure construction and upgrading (particularly the traffic upgrades and beautification

measures in downtown Castries). Improved accessibility will benefit the local population as well as tourists to the islands, including those with disabilities, and harmonization of works with flood protection plans will enhance sustainability of any works.

Another major positive impact is the increased visibility and exposure of eco-tourism, historical tourism, and other activities that highlight and showcase the natural habitat and physical cultural resources of the OECS region. With such exposure may come appreciation and desire for protection and conservation.

Efforts to maximize the positive benefits of the works should be sought during design and implementation.

4.3.2 Negative Impacts

There is the possibility of the occurrence of the following negative impacts associated with the projects. Table 4 provides a summary of the potential negative impacts.

Table 4: Potential Negative Impacts of Activities

Activity	Potential Negative Impacts	Significance / Remarks
Restoration and rehabilitation of historic forts, sites, parks, lighthouses, and other areas with physical cultural value	<ul style="list-style-type: none"> - Damage to historic structures or areas - Incompatibility of selected design with community wishes - Clearing or impingement upon natural habitat - Poor trail design resulting in erosion or visual scars - Occupational safety and health risk to workers - Traffic and community safety issues - Temporary/permanent land acquisition (specifically for road improvements leading to Forts) or to livelihoods of self-employed persons operating at the sites. - Dust, debris, fumes of industrial chemicals during construction may affect nearby residents and occupants of institutions, such as General Hospital in Grenada, which is downwind of Fort George - Restricted or limited access and road detours during civil works - Temporary limited or no access to site during construction works - Temporary increase of waste generation 	<ul style="list-style-type: none"> - Potentially significant and long term in both construction and operation - Physical cultural resources and natural habitat concerns require a detailed assessment and management plan - Typical civil works impacts can be addressed through standard measures - Any potential land acquisition is anticipated to be discrete and can be readily mitigated by the use of standard measures.
Ferry, jetty, dock, and other transportation related works	<ul style="list-style-type: none"> - Turbidity or other damage and modification to reef and/or marine environment - Change in currents or wave energy affecting beach - Poor fueling, waste, or other operation practices - Increased marine traffic safety and pollution issues - Temporary/permanent land acquisition - Unavailability of jetty, docks during construction works - Temporary interruptions to livelihood practices and businesses in the project areas - Temporary increase of waste generation 	<ul style="list-style-type: none"> - Moderately significant and long term - Natural habitat concerns may be relevant and require additional assessment - Typical civil works impacts can be addressed through standard measures - Any potential land acquisition is expected to be discrete and can be readily mitigated using standard measures.
Transportation Works in downtown Castries (streets, sidewalks, etc.)	<ul style="list-style-type: none"> - Occupational health and safety - Risk to traffic and pedestrians - Compatibility with flood control schemes - Noise, dust, vibration, spills, air pollution - Temporary/permanent land acquisition, economic displacement - Ensuring adequate access to bathroom facilities in the event that works block access to public bathroom facilities - Ensuring accessibility for physically disabled individuals via the installation of ramps and other measures as 	<ul style="list-style-type: none"> - Low to moderate, short term - Typical civil works impacts can be addressed through standard measures - Any potential land acquisition and/or economic displacement is expected to be temporary and discrete - Issues of accessibility and land acquisition/economic displacement can be mitigated using standard social safeguards instruments and measures

	necessary, at sub-project sites undergoing infrastructure construction and upgrading - Ensuring access for disabled persons	
Works in Botanical Gardens (Saint Lucia)	- Loss of natural hábitat - Damage to aesthetic or visual resources - Care of species housed on site (parrots) - Community and access issues	- Low to moderate, short term - Physical cultural resources and natural habitat concerns may be relevant and require additional assessment - Typical civil works impacts can be addressed through standard measures
Works in protected areas	-Increased stress on reefs from increased tourism - Poor fueling, waste, or other operation practices - Increased marine traffic safety and pollution issues - Long-term modification of marine habitat (as a result of anchorage sites) - Increased long-term waste generation	- Moderately significant and long term - Natural habitat and physical cultural resource concerns may be relevant and require additional assessment

The effects of the impacts above can also be described individually as follows:

- Loss of or Damage to Physical Cultural Resources
- Destruction or Damage to Terrestrial Natural Habitat
- Impacts on Marine habitats and Coastal Environments
- Road safety, traffic and community risk
- Increased Vibration and Noise levels
- Poor Solid and Liquid Waste Management
- Air pollution
- Occupational Health and safety issues
- Involuntary Resettlement (which could refer to permanent or temporary acquisition of private land; physical or economic displacement)

Each of the impacts is described in more detail below. Measures to avoid, minimize, and mitigate the negative effects, are described in Section 5 of this ESMF.

- *Loss of or Damage to Physical Cultural Resources*

During restoration and rehabilitation of the historic forts and other showcase prominent landmarks, damage to the visual or aesthetic qualities of the structures could occur. Poor or inappropriate choice of stones, mortar, layout, or design, or other aspects could cause irreparable harm to the structures.

In undertaking restoration works of a historic heritage site like Fort George or Fort Charlotte, it is imperative that the restoration works be done by people who are knowledgeable and experienced in this highly specialized field. Otherwise, irreparable damage could be done to the physical structures of the Forts, or amenities added (such as toilets or stores) in a style totally out of place in a heritage site. UNESCO World Heritage site status could be jeopardized if the values which make the sites unique are threatened.

In addition, during construction activities there is the possibility of coming across or “chance finding” what may appear to be an historical or cultural artifact which may need to be studied and preserved by the relevant authorities. One example is the sunken ship that became partially

exposed on the Georgetown beach a few years ago. In cases like this, the artifact could be lost due to careless construction activities prior to the relevant authorities determining whether or not it is worthy of preservation. It is therefore recommended to consult with local stakeholders as to the final design of facility, and the disposition of any potential physical and cultural resources, because the valuation of such items is ultimately subjective and they are of most value to local stakeholders.

- *Destruction or Damage to Terrestrial Natural Habitat*

The works to be undertaken may be located in designated parks, protected areas, or reserves. In some cases there are eco-tourism trail systems interconnecting through historical areas. Land clearing, trail building, or installation of facilities such as interpretation centers, bridges, customs buildings, or other installations may be poorly sited or impact areas of natural habitat. This impact must be considered as significant, moderate or even major, depending on the area affected. If vegetation is to be cleared in areas considered significant natural habitat, then the screening mechanism for Natural Habitats is triggered and additional assessment is required to properly develop mitigation measures. Likewise if project activities are to take place in areas where coral reefs, sensitive coastal ecosystems, or marine protected areas occur, then additional evaluation would be needed.

- *Impacts on the Marine and Coastal Environments*

Coastal zones and reefs may be affected by project works and activities. If project activities are to take place in areas where coral reefs, sensitive coastal ecosystems, or marine protected areas occur, then additional environmental evaluation or assessment would be needed. The design of jetties, docks, or other structures in the marine or coastal environments may affect wave energy, currents, or sediment transport, resulting in unintended changes to beach and nearshore ecosystems. Turbidity from construction in water may also deleteriously affect marine life by siltation and sedimentation, with potential damage to sea-grass meadows, coral reefs, or other sensitive natural habitat. Increased tourism pressure may also affect marine and coastal environments. Increased boat and ship traffic also has negative implications for marine safety, as well as increased risk of improper waste management, fuel spills, and other impacts.

The activities involved in the implementation of the project, particularly those occurring in marine protected areas, will most likely interface with pristine and possibly fragile coastal and marine ecosystems; therefore the disposal of waste (oil, grease etc.) could cause pollution in the area (if poorly managed) and quite possibly affect some of the natural resources. Installation of jetties and docks may also cause damage to the marine environment due to physical disturbance of the seafloor and benthic organisms (if poorly routed), generation of silt during dredging, and degradation of poorly selected materials over time. Dock sites may be located in sensitive coastal areas, where beaches important to tourism occur, or where they could interfere with fishing or boat traffic.

- *Increased Traffic and Potential for Traffic Conflict*

Works within the city centres carry the possibility of increased construction-related traffic for civil works of certain sizes especially when the works are occurring in crowded zones such as

downtown Castries. The potential for vehicular/vehicular and pedestrian/vehicular conflict increases as the scale of construction increases if proper traffic management procedures are not implemented. This can lead to very tempered negative response from the nearby residents or the community affected. The breakdown of a large project vehicle causing the blockage of a well travelled route can escalate tensions within a community especially if it contributes to loss of travel time to work, school, or returning home.

- ***Increased Noise and Vibration levels***

Increased noise and vibration levels resulting from construction activities such as the movement of heavy supply trucks into and out of the site, the use of various forms of heavy equipment such as demolition equipment, can have negative impacts on the residents. The effects within communities and residential areas, can be deemed as an unnecessary and unwanted nuisance affecting local business and day to day activities. Care must be taken in the judicious usage of any form of heavy noise and vibration equipment. Associated vibrations from the use of heavy equipment such as rollers can negatively impact surrounding communities, causing nuisances by shaking household items and possibly affecting the stability of nearby structures.

The use of the vibration and / or noise producing equipment can be a potential nuisance to the local community depending on location. It may also create an unacceptable disturbance to marine species. This impact is ranked as minor and significant mainly because of the people's intolerance to this type of nuisance.

- ***Poor Solid and Liquid Waste Management***

The improper management and disposal of both solid and liquid wastes can be detrimental to both the terrestrial and to the nearby marine environment. The mishandling of construction wastes such as chemicals, detergents, greases, oils, building materials, can lead to the poisoning of the terrestrial environment. The entry into the marine environment of any waste or chemical, either through runoff, in drains, or are blown by the wind can also poison the marine environment or damage the fragile marine ecosystem. The management of human wastes on site is very critical to ensuring a healthy working environment and reduce the risk of faecal contamination. The management of food wastes is also critical to reducing the incidence of vector entry into an area causing infestation.

The potential for terrestrial and marine pollution can occur with indiscriminate disposal of both solid and liquid wastes. The mishandling of chemicals and especially waste oils during construction activities can poison the landscape. During rainfall events chemicals can mix with or be carried by runoff and create liquid wastes that impact both terrestrial and marine environments. Improper disposal of human wastes can lead to similar effects. This also applies to pesticides used in termite treatment of construction sites. Managing excavated soil is also important especially when this soil is being transported to another site for use or storage. Care must be taken to ensure the appropriateness of the transport and the protocols for transporting and storing the soil.

- ***Air Pollution***

Air pollution can come from a number of sources. The vehicles and machinery being utilized can both produce noxious fumes such as carbon monoxide, diesel fumes, as well as burnt oil fumes. There is the increased potential for air pollution to come from older or improperly service vehicles and machinery as well. Dust also arises from cleared land that has been exposed to the sun, is dried, and the wind carries this material to nearby residences or communities. Similarly, uncovered fines such as sands or even cement can be light enough to be blown by the wind. This is a nuisance to nearby facilities or communities. The mishandling of particularly noxious chemicals such as solvents or chemical washes, greases, as well as the burning of solid wastes on the construction site, especially chemical containers, can lead to air pollution resulting in negative health impacts.

- *Occupational Health and Safety Issues*

The International Labour Organization (ILO) defines decent work as safe and having appropriate compensation. Worker safety is critical to any operation, therefore, mishandling of equipment, the improper storage and usage of various chemicals and construction materials on site, poor and unsafe working conditions, high levels of continuous noise and fumes, as well as inadequate safety equipment can cause serious injury and down time to the workers and project and should therefore be avoided. Best management practices should always be implemented as labour laws hold the employer responsible for the workers safety. Proper facilities will need to be provided for workers in the interest of the workers and the environment.

There is also potential hazards during any offshore or work (ie, over-water) such as boating, tourism, dock or jetty construction, and tourism activities. This is significant mainly because of the high level of concern and legislation for the protection of public health and safety.

- *Involuntary Resettlement*

While private land acquisition is not anticipated, final designs have not yet been developed, and rehabilitation works (particularly under Components 1 and 2) may lead to permanent or temporary land acquisition, resettlement, and/or economic displacement. Involuntary resettlement may cause severe long-term hardship, impoverishment, and environmental damage unless appropriate measures are carefully planned and carried out, particularly in an extreme scenario if it becomes necessary to relocate people from their usual place of residence which is of cultural or of economic importance (prime fishing, tourist attraction and recreation area, for example) to facilitate the implementation of the project.

5.0 MITIGATION MEASURES

As described in Section 2 of this ESMF, proposed activities will involve the rehabilitation of sites and facilities, some of which are located in protected areas with natural habitat and physical cultural resources, and some of which may lead to potential involuntary resettlement impacts. Given the potential impact of these activities, the project is considered as Category B, and the Environmental Assessment Policy (OP/BP 4.01) has been triggered. In addition, the Natural Habitats Policy (OP 4.04) is triggered given that some of the proposed works will be carried out in ecologically sensitive areas or protected areas, and coastal works (jetties, terminals, and mooring plans) may also affect ecologically sensitive coastal zones and natural habitat. The Physical Cultural Resources Policy (OP 4.11) has also been triggered, given that the project aims to rehabilitate sites of historic importance, including for instance Fort George in Grenada and Fort Charlotte in Saint Vincent. Some of the works may involve the use of pesticides for building treatment or extermination of pests, therefore the Pest Management Policy (OP 4.09) is also triggered. The mitigation measures in this Section of the ESMF provide the basis to minimize or avoid the negative impacts, in accordance with the WBG safeguard policies. Access for disabled persons should also be considered in the design of works. Finally, the Involuntary Resettlement Policy (OP 4.12) is triggered because works under components 1 and 2 may lead to permanent or temporary land acquisition, resettlement, and/or economic displacement.

Mitigation measures address the potential impacts of the projects to reduce or avoid any negative social and environmental impacts. As indicated in section 4 of this ESMF, some of the potential impacts are associated with physical cultural resources, natural habitat, and involuntary resettlement. These types of impacts may be fairly complex and would require additional assessment and analysis to design the appropriate mitigation measures. Screening to identify these types of risks and impacts is described in more detail in section 6 of this ESMF. Additional mitigation measures would be derived from any conditions imposed by any statutory agency who reviewed the sub-projects and provided recommendations or conditionalities. These could also be converted to contract clauses as necessary.

5.1 Simple/Generic Mitigation Measures

There are always minor impacts associated with the construction phase of any civil works. Most of the negative impacts associated with the sub-projects are expected to occur during the construction phase. While these impacts are not expected to be major, the careful implementation of mitigation measures will allow for the reduction or avoidance of any adverse effects. These general impacts have been identified above and the following in Table 5 is a list of the potential mitigation measures. The measures are presented in a manner that makes them easily incorporated into an EMP and, with appropriate adjusting, can become contract clauses for the contractor who will undertake the civil works. This also allows for ease of monitoring as well. Minor use of pesticides (e.g. for termite treatments of building foundations, or for extermination) is also included in the standard EMP below (note that the use or purchase of significant amounts of pesticides is not eligible under the Project).

Table 5. General Civil Works - Impact Areas and Mitigation Measures

	IMPACT AREA	MITIGATIVE MEASURES
1	Traffic impacts	<ul style="list-style-type: none"> (a) A traffic management plan to be developed and implemented by contractor in consultation with the Traffic authority. (b) Alternative routes to be identified in the instance of extended road works or road blockages. (c) The public to be notified of all disturbances to their normal routes. (d) Signposting, warning signs, barriers and traffic diversions must be clearly visible and the public warned of all potential hazards. (e) Provision must be made for the safe passages and crossings for all pedestrians where construction traffic interferes with their normal route. (f) There must be active traffic management by trained and visible staff at the site or along roadways as required to ensure safe and convenient passage for the vehicular and pedestrian public. (g) Adjustment of working hours to facilitate local traffic patterns, e.g. avoiding major work activities during rush hours and do temporary road closures at night.
2	Noise	<ul style="list-style-type: none"> (a) Construction / work activities will occur within specified daylight hours e.g. 8:00 am to 4:00pm. (b) Community / public to be informed in advance of any work activities to occur outside of normal working hours or on weekends. (c) Sites should be hoarded wherever possible. (d) During operations, the engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed as far away from residential areas as possible. (e) There will be no excessive idling of construction vehicles at sites. (f) Noise suppression equipment or systems supplied by manufacture will be utilized. (g) Ensure all vehicles and equipment are properly serviced. (h) The contractor must develop and implement a public notification and noise management plan.
3	Solid and Liquid Waste Management (general)	<ul style="list-style-type: none"> (a) Contractor to develop and implement waste management plan in consultation with the local solid waste authorities. (b) Contractor to abide by all pertinent waste management and public health laws. (c) Waste collection and disposal pathways and sites will be identified for all major waste types expected from demolition and construction activities. (d) Construction and demolition wastes will be stored in appropriate bins. (e) Liquid and chemical wastes will be stored in appropriate and labeled containers separated from the general refuse. (f) All waste will be collected and disposed of properly in approved landfills by licensed collectors. (g) The records of waste disposal will be maintained as proof for proper management as designed. (h) Whenever feasible the contractor will reuse and recycle appropriate and viable materials (except asbestos or other hazardous material).

		(i) Construction related liquid wastes must not be allowed to accumulate on or off the site, or to flow over or from the site in an uncontrolled manner or to cause a nuisance or health risk due to its contents.
4	Solid and Liquid Waste Management for hazardous substances.	<p>(a) Contractor must provide temporary storage on site for all hazardous or toxic substances in safe containers labeled with details of composition, properties and handling information.</p> <p>(b) The containers of hazardous substances shall be placed in a leak-proof container to prevent spillage and leaching.</p> <p>(c) The wastes shall be transported by specially licensed carriers and disposed in a licensed facility.</p> <p>(d) Paints with toxic ingredients or solvents or lead-based paints will not be used.</p> <p>(e) Banned chemicals will not be used on any project.</p> <p>(f) If termite treatment is to be utilized, appropriate chemical management measures will be implemented to prevent contamination of surrounding areas and use only licensed and registered pest control professionals with training and knowledge of proper application methods and techniques.</p> <p>(g) Any project which involves the purchase or use of pesticides, other than incidental amounts (for example termite treatment in item (f) above), will be excluded during the screening project.</p>
5	Solid and Liquid Waste Management for asbestos	<p>(a) If asbestos is located on the project site, it shall be marked clearly as a hazardous material.</p> <p>(b) If work has already commenced, all work in the area must stop immediately.</p> <p>(c) An asbestos management plan must be prepared by the contractor and approved by the relevant local health and waste management authorities.</p> <p>(d) Where possible the asbestos and its location must be appropriately contained and sealed to minimize exposure.</p> <p>(e) The asbestos prior to removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust.</p> <p>(f) Asbestos will be handled and disposed of by skilled & experienced professionals using appropriate PPE (personal protective equipment) such as respirators and tyvec suites.</p> <p>(g) If asbestos material is to be stored temporarily, the wastes should be secured within closed containments and marked appropriately.</p> <p>(h) Security measures must be implemented against unauthorized removal of asbestos from the site.</p> <p>(i) No removed asbestos will be reused.</p>
6	Solid and Liquid Waste Management for Medical Wastes	<p>(a) The contractor must ensure that all persons handling medical wastes are provided with proper protective clothing.</p> <p>(b) All medical wastes must be treated as hazardous.</p> <p>(c) All medical wastes must be secured in specially labeled and sealed containers separate from other wastes streams.</p> <p>(d) All medical wastes must be disposed of in accordance with relevant local legislation at specified disposal sites.</p>
7	Deforestation	(a) There must be no unnecessary clearing of forests or well-preserved natural vegetation, without an appropriate assessment and management,

		<p>restoration and compensation plan.</p> <p>(b) Avoid the use of herbicides or other chemicals.</p> <p>(c) Any works to be undertaken in a protected forest area must be done under the supervision of a representative of the Forestry Department.</p> <p>(d) The contractor must ensure that any work undertaken in the forest reserve be done by manual means.</p> <p>(e) There must be minimal impact to flora and fauna in the forest area.</p> <p>(f) All recognized natural habitats; wetlands and protected areas in the immediate vicinity of the activity must be protected from damage or exploitation.</p> <p>(g) The contractor must ensure that all staff be strictly prohibited from hunting, foraging, logging or other damaging activities.</p> <p>(h) A survey and an inventory shall be made of large trees and rare medicinal plants in the vicinity of the construction activity, these shall be marked and cordoned off with fencing, their root system protected, and any damage to the trees avoided.</p> <p>(i) There will be no unlicensed borrow pits, quarries or waste dumps in protected areas.</p> <p>(j) Upon completion, all wastes must be immediately removed from the forested area.</p>
8	Air Quality	<p>(a) Construction materials such as sand, cement, or other fines should be kept properly covered.</p> <p>(b) Cement should be kept stored within a shed or container.</p> <p>(c) The sand and fines should be kept moistened with sprays of water.</p> <p>(d) Unpaved, dusty construction roads should be compacted and then wet periodically.</p> <p>(e) During interior demolition debris-chutes shall be used above the first floor.</p> <p>(f) Demolition debris shall be kept in controlled area and sprayed with water mist to reduce debris dust.</p> <p>(g) During pneumatic drilling/wall destruction dust shall be suppressed by ongoing water spraying and/or installing dust screen enclosures at site</p> <p>(h) The surrounding environment (sidewalks, roads) shall be kept free of debris to minimize dust.</p> <p>(i) There will be no open burning of construction / waste material at the site.</p> <p>(j) There will be no excessive idling of construction vehicles at sites.</p> <p>(k) The bins of all haulage vehicles transporting aggregate or building materials must be covered on all public roads.</p>
9	Terrestrial and Marine Pollution	<p>(a) The contractor must implement all necessary waste management plans and measures.</p> <p>(b) All construction materials, including chemicals, must be properly stored.</p> <p>(c) The contractor will establish appropriate erosion and sediment control measures such as hay bales, sedimentation basins, and / or silt fences and traps to prevent sediment from moving off site and causing excessive turbidity in nearby streams, rivers, wetlands, and coastal waters.</p> <p>(d) If works are to be done along coastal marine areas or near major streams and rivers, water quality monitoring must be done before construction, and at regular intervals during construction to determine turbidity levels and other quality parameters.</p>

		<p>(e) See soil erosion and slippage mitigation measures below.</p> <p>(f) Construction vehicles and machinery will be washed only in designated areas where runoff will not pollute natural surface water bodies.</p>
10	Soil Erosion and Slippage	<p>(a) The contractor must ensure that appropriate erosion control measures such as silt fences are installed.</p> <p>(b) Proper site drainage must be implemented, including drainage at the tops of slopes, around slopes, and beneath roadways.</p> <p>(c) Any drain clogged by construction material or sediment must be unclogged as soon as possible to prevent overflow and flooding.</p> <p>(d) The use of retaining structures and planting with deep rooted grasses to retain soil during and after works must be considered.</p> <p>(e) The use of bio-engineering methods must be considered as a measure to reduce erosion and land slippage.</p> <p>(f) Keep angle of slopes within limits of soil type.</p> <p>(g) Balance cut and fill to limit steepness of slopes.</p> <p>(h) All slopes and excavated areas must be monitored for movement.</p>
11	Occupational Health and Safety Issues	<p>(a) The contractor must ensure that an Occupational Health and Safety Plan is in place to guide work activities, and provide a safe environment for workers.</p> <p>(b) The contractor must ensure that all workers operate within a safe environment.</p> <p>(c) All relevant Labour and Occupational Health and Safety regulations must be adhered to ensure worker safety.</p> <p>(d) Workers must be provided with necessary equipment as well as protective gear as per their specific tasks such as hard hats, overalls, gloves, goggles, boots, etc.</p> <p>(e) Sanitary facilities must be provided for all workers on site.</p> <p>(f) The contractor must ensure that there are basic medical facilities on site and that there are staff trained in basic first aid.</p> <p>(g) Appropriate posting of information within the site must be done to inform workers of key rules and regulations to follow.</p>
12	Accidental destruction of artifacts during earth moving or excavation	<p>(a) The contractor must ensure that provisions are put in place so that artifacts or other possible “chance finds” encountered in excavation or construction are noted and registered, responsible Authorities contacted, and works activities delayed or modified to account for such finds.</p> <p>(b) No item believed to be an artifact must be removed or disturbed by any of the workers.</p>
13	Involuntary Resettlement	<p>(a) Preliminary screening will be undertaken during the preparation phase of works at all sub-project sites in order to determine the existence of any potential involuntary resettlement impacts (including temporary/permanent land acquisition, physical or economic displacement);</p> <p>(b) Involuntary Resettlement will be avoided to the extent possible. Where it is not feasible to avoid involuntary resettlement impacts, the procedures to follow in order to screen for/assess, minimize, mitigate, and compensate for any negative impacts will be established in a single,</p>

		<p>regional Resettlement Policy Framework (RPF) that will be developed for the project and disclosed prior to project appraisal. The RPF will provide guidelines for the development of social safeguards instruments as needed (e.g. Resettlement Action Plans, Temporary Resettlement Plans, Compensation Plans) to mitigate land acquisition and/or other social issues that may arise from works undertaken during the course of project implementation. The RPF will include country specific chapters reflecting country-specific legal legislation and the organization of the respective implementation units.</p>
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It is expected that the projects would receive adequate technical review by qualified technical professionals to ensure their technical and environmental soundness and social sustainability. Engineering review for all construction details and designs should be integral in this process.

5.2 Complex/Special Mitigation Measures

Additional mitigation measures would be derived from any conditions imposed by any statutory agency that reviewed the sub-projects and provided recommendations or conditionalities, for example in EIA permit requirements. These must also be converted to contract clauses as necessary.

Finally, it is noted that some of the potential impacts are associated with physical cultural resources and natural habitat. These types of impacts may be fairly complex and would require additional assessment and analysis to design the appropriate mitigation measures. Screening to identify these types of projects is described in more detail in section 6 of this ESMF. Additional mitigation measures would be derived from the additional assessment work; for those projects affecting historic structures (e.g. Fort Charles, Fort Charlotte, or others) the additional requirements will be in the form of a Physical Cultural Resources Management Plan (PCRMP) to be prepared as part of the additional assessment.

6.0 SCREENING PROCEDURES

This section of the report provides the screening procedure for future work activities and subprojects. The purpose of the screening process is (i) to identify the potential environmental and social impacts of a particular subproject in the future as it becomes defined with clarity and detail, and (ii) to include the appropriate environmental and social mitigation measures in its scope of work (SOW) and terms of reference (TOR).

As described in section 2 of this ESMF, the preliminary project descriptions, impact evaluations, and generalized mitigation measures given previously in this report provide a good starting point, but as is often the case, details and particulars may change over time. In the future as detailed actions emerge and physical works ready to begin, the scope, scale, and design of particular activities become fully known. At that time it will be necessary to ascertain their potential environmental and social impacts through a screening process, and determine which mitigation measures must apply for environmental protection and mitigation of any social risks and impacts. In some cases with minimal impact (e.g. renovation of a small customs-house) the answer may be to use standardized or generic mitigation measures; in this case, a standard/generic EMP and associated contract clauses are provided in this ESMF. Perhaps more importantly it will be necessary to identify works which could have more significant impacts (e.g. restoration of major historical structures) and which would require additional evaluation, assessment, and the preparation of a separate Environmental Assessment (EA) with a PCRMP.

The initial screening and scoping of the sub-project sites must also focus on social aspects. It should identify the extent and complexity of potential social impacts and the socio-economic characteristics of people in the project area. Special attention should be paid to vulnerable or disadvantaged groups who could experience adverse impacts from the proposed project more severely than other groups. If the initial screening indicates potential adverse social impacts and risks (including but not limited to involuntary resettlement, temporary/permanent land acquisition and/economic displacement), a more thorough social assessment will be undertaken to determine the nature and magnitude of impacts, the people affected, and identification of mitigation measures. The development of specific safeguards instruments may become necessary during the course of project implementation (i.e. Resettlement Action Plans, Compensation Plans, Relocation Plans, etc.) and will be guided by the principles laid out in the Resettlement Policy Framework (RPF) which is included in Annex 5.

This ESMF provides a preliminary assessment of the potential social and environmental risks and impacts and related mitigation measures. For simple works, a generic Environmental Management Plan (EMP) is included in the ESMF, which will also define criteria for more detailed Environmental Assessments (EAs) as needed. The ESMF accounts for natural habitats and physical cultural resources when screening potential works which are already identified, and provides screening criteria for future sub-projects to determine if additional assessment and specialized mitigation measures would be required, once detailed designs are known during implementation.

6.1 Screening Processes

Each sub-project may have site specific issues that contribute to potential social and environmental impacts. A screening mechanism and a scoping exercise are key tools to assist assessing officers in red flagging potential environmental and social risks or issues as part of the assessment process at an early stage in the project identification cycle. This process would allow for the highlighting of potential impacts, mitigation measures to address the potential impacts, and allowing for the incorporation of these mitigation measures as contract clauses for the proposed small works.

To facilitate the process it is necessary for the assessing individual or agency to use a screening or scoping tool, typically a checklist (**Table 5**), to determine the potential red flags or issues, and to trigger specific responses as appropriate. The checklist helps to identify and assess potential impacts and contribute to the wider decision making process involving the proposed project and project activities. The checklists and its response should be fed into the EMP and proposed mitigation measures to address potential issues that have been identified and as necessary, trigger additional measures such as impact analysis.

The PCU of each OECS country, as the coordinator of the safeguards and fiduciary aspects of the Project, will use the screening checklist during the scoping exercise so that an officer may be able to determine that a project has certain environmental and/or social ramifications that were not previously identified, or which bear additional assessment and planning to avoid environmental impacts.

6.2 Screening Criteria and Checklists

To begin, it is necessary to determine whether a proposed sub-project falls into one of two groups: those which involve more complex environmental and social conditions and/or potentially significant environmental or social effects (if unmitigated) and which therefore require more cautious planning efforts; or, those comprising relatively simple or uncomplicated works where the impacts are minimal (e.g., effects during construction of repairs and retrofitting) and which can be addressed through standardized or generic mitigation measures.

6.2.1 Relatively Complex Sub-projects

There are several criteria to determine if a sub-project or activity is environmentally or socially complex or may have potentially significant environmental and/or social impacts if unmitigated. These would include the following:

- Potential impact to physical cultural resources (OP/BP 4.11): whether or not a specific subproject or activity would potentially affect objects, sites, structures, natural features or landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. This would include historic buildings or structures such as forts or lighthouses, viewpoints or lookouts.

- Potential impact to natural habitats (OP/BP 4.04): whether or not a specific activity or subproject would potentially affect land or water areas where the biological communities are formed largely by native plant and animal species where human activity has not essentially or heavily modified the area's primary ecological functions. This would include reefs, coastal areas, mangroves, forests, and any declared or designated parks or protected areas.
- Potential involuntary resettlement (OP/BP 4.12): whether or not a specific activity or subproject requires the acquisition of private land, physical resettlement, economic displacement, and/or the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods of displaced individuals.

The following checklist in Table 6 is intended to be used as a first tier screen or adapted with modifications to fit the specific suite of sub-projects being considered by the Project, to assist the PCU in determining if a project is likely to have significant environmental and/or social impacts or presents complex conditions for which an environmental or social assessment is required.

Table 6. Identification of Complex/Sensitive Sub-Projects or Activities

Characteristic of Sub-project or Activity:	Yes/No	Observations
1. Will the project significantly modify any coastal zone features, reef or marine feature?		
2. Could the project activities affect any parks, natural or protected areas, coastal zone, or Forest Reserves?		
3. Could the project impact or affect the habitat of endangered species of plants or animals?		
4. Could the project adversely affect natural waterways (streams, rivers, or wetlands) by sedimentation, pollution, flooding, draining, or filling)?		
5. Would the works require leveling and clearing of lands with natural habitat (those water or land areas where most of the original plant and animal species are still present)?		
6. Would the works adversely affect cultural property, including archeological and historical sites?		
7. Does the project involve the restoration or rehabilitation of any historic structure?		
8. What are the general demographic and socio-economic characteristics of the population living in this area?		
9. Are there vulnerable or disadvantaged groups residing in the project area who could experience adverse impacts from the proposed project more severely than other groups?		
10. What are the land ownership patterns at this subproject site? i.e. how many households with (i) formal rights to land; (ii) semi-formal rights or claims to land; and (iii) informal		

land use/occupation, i.e., squatters		
11. What are the main sources of income and employment for the population residing in this area?		
12. Will proposed works or activities at this site imply the acquisition of any private land/physical displacement/economic displacement/restriction of access to legally designated parks and protected areas?		
13. Will proposed works at this site imply any other potential social risks or impacts?		

In cases where it is suspected that a specific sub-project or activity could meet these criteria, the screening procedure would result in a positive determination, as these activities would affect natural habitat and/or physical cultural resources, and/or imply social risks and impacts. These projects are likely to have other complex environmental or social conditions as identified in the checklist above and such subproject would require a separate stand-alone EIA to be done specifically for that sub-project. For sub-projects requiring a stand-alone EIA, the EIA will be completed prior to initiation of the works and will establish environmental requirements for the design and construction phase of the activity in the form an EMP specific to that sub-project. For projects affecting physical cultural resources, the EIA must include a Physical Cultural Resources Management Plan (PCRMP).

In cases where a specific activity or works at a subproject site imply potential social risks and impacts (including but not limited to involuntary resettlement, land acquisition, economic displacement), a standalone Social Assessment will be undertaken to ascertain the nature and extent of impacts and determine appropriate mitigation and compensation measures with the Project Affected Peoples (PAPs). Specific social safeguards instruments will be developed and implemented as needed.

6.2.2 Relatively Simple Sub-projects

If none of the criteria in Table 5 apply to a particular sub-project or activity, then it is considered to have only a limited and minor environmental and/or social impact. Based on the discussion and analysis in Section 4 of this report, sub-projects with minor civil works will involve only limited or minor impact, and can be easily mitigated by using standardized generic environmental controls that represent best practice for construction of civil works. For the relatively uncomplicated environmental actions required of these activities, standardized generic construction contract clauses are sufficient, and can be applied as needed to works construction contracts. Typical draft language for inclusion in contracts can be found in Appendix 8 of this report. Further discussion of the generic EMP is provided in section 7 of this report.

6.3 Local Permitting

During the scoping phase of the project assessment, the PCU officer uses his/her training and experience to make a determination bases on the degree of impact likely to be caused by the project due to its size, proximity to a coastal area, marine or terrestrial reserve and the existing

topography that may be disturbed. For all activities in the Project, the requirements of the local Physical Planning Department (or Development Authority) must be followed, as well as all laws and regulations pertaining to environmental protection in the host country. Any permit condition, local requirement, or other authorization stipulation must be included in the TOR and SOW for all project activities.

6.4 Physical Cultural Resources Management Plan (PCRMP)

Future EAs during implementation will further define works particularly in historic sites. It is expected that the historic site rehabilitation at Fort George and Fort Charlotte will require an EA which includes a Physical Cultural Resources Management Plan (PCRMP), to integrate the extensive identification and assessment work previously done as part of the nomination dossier for UNESCO World Heritage Site status. The ESMF includes the procedures applicable for reviewing all the sub-projects as regards PCR, including additional assessment as needed and substantial public participation in final project design.

TORs for future EAs will specify extensive consultation and coordination with the national Tourism and Cultural Ministries, the National Trusts, Planning and Development authorities, and other local organizations, as well as review of previous work and consultation with international organizations including ICOMOS, UNESCO, and IUCN. Local experts have already been engaged to develop preliminary rehabilitation plans for historic sites, and these will be defined further in consultation of EAs to develop the final renovation designs and corresponding PCRMPs for key high visibility projects. Since there are also road works and other activities which may involve excavation, a “chance-find” procedure will also be included in the ESMF and EA to fully implement OP4.11.

The EA TORs should reference WBG’s EHS Guidelines for Tourism and Hospitality Development as well as UNEP’s Guidance on Sustainable Coastal Tourism, and must build on existing country and regional environmental policies for tourism development and coastal zone management. Annex 2 contains general guidelines for the TOR.

7.0 ENVIRONMENTAL MANAGEMENT PLAN

This section of the report describes the link between the predicted environmental impacts, the needed mitigation measures identified during the screening and assessment process, provisions for budgeting the costs of such measures, and the roles of those responsible for ensuring that the mitigation measures are carried out.

7.1 Standard/Generic Mitigation Measures

The mitigation measures for relatively simple environmental management issues are based on best management practice and industry standards for small civil works. These are the mitigation measures which are expected of all professional contractors who are performing civil works, and represent the minimum standard of execution for environmental protection during the execution of such works.

7.2 Additional Mitigation Measures

If there are local or national permit requirements (e.g. from the Development Authority or Planning Department), then the generic minimum mitigation measures and monitoring conditions in Table 6 above should be amended to include the conditions and recommendations of the authority's permit, and included in the contracting documents.

If an EIA has been conducted for a particular sub-project due to its environmentally sensitive or complex nature (see section 6), then the specific recommendations for mitigation measures in that EIA should also be included as contract clauses, in addition to the standard minimum EMP in Table 6 above.

The EIA for the rehabilitation at Fort George and Fort Charlotte will include a Physical Cultural Resources Management Plan (PCRMP), as well as the results and recommendations from extensive consultation and coordination with the national Tourism and Cultural Ministries, the National Trusts, Planning and Development authorities, and other local organizations. The PCUs will engage the services of an Environmental Consultant (EC) to prepare the EIA and PCRMP for these projects. The TOR for the EC will be coordinated with WBG.

7.3 Environmental Performance Clauses

Typical generic environmental clauses in Appendix 8 of this report will feed into the specific contract clauses for these types of works which are deemed to have minimal or limited impacts. These clauses are general and may be modified to conform to applicable laws and contract procedures as necessary for such works and shall remain in force throughout the contract period.

Generic contract clauses are provided in Appendix 8 for the following general conditions for small civil works, roads, buildings, and other works expected to have minor impacts:

- Permits and Approvals
- Site Security
- Chance Discovery of Antiquities
- Worker Occupational Health and Safety
- Noise Control
- Use and Management of Hazardous Materials, fuels, solvents and petroleum products
- Use and Management of Pesticides
- Use of Preservatives and Paint Substances
- Use of Explosives
- Site Stabilization and Erosion Control
- Traffic Management
- Management of Standing Water
- Management of Solid Wastes (trash and construction debris)
- Management of Liquid Wastes

If an EIA has been conducted for a particular sub-project due to its environmentally sensitive or complex nature (see section 6), then the specific recommendations for mitigation measures in that EIA should also be included as contract clauses, in addition to the standard minimum EMP in Table 6 above. If there are local or national permit requirements (e.g. from the Development Authority or Planning Department), then the generic minimum mitigation measures and monitoring conditions in Table 6 above should be amended to include the conditions and recommendations of the authority's permit, and included in the contracting documents.

It is expected that these generic clauses will be incorporated into all contracts, as applicable. For purposes of cost estimation and budgeting, the contractors should be aware of the existence of the environmental mitigation measures and associated EMP requirements, and include cost items for such purposes in their proposals.

7.4 Supervision, Monitoring, and Reporting

Supervision for compliance with environmental and social safeguards policies will be managed by the PCU in each country (Figure 5). Understanding that environmental management is a cross-sectoral task especially within a small island developing states like those in the OECS with limited financial and technical resources, the PCU may require support from beneficiary agencies such as the Ministry of Tourism, Ministry of Public Works, Ministry of Environment, or others as the case may be, and may form agreements or committees to mutually support supervision efforts. For each particular project, the Contractor must also have the responsibility for on-the-ground compliance with the contract clauses, recommendations, and mitigation measures. The World Bank will provide periodic technical assistance during project implementation.

The PCU will serve as overall project coordinator for the Project undertaking the tasks of evaluation, supervision and implementation. The PCU will designate a field representative who shall conduct periodic inspections to assure environmental compliance; and a dedicated social

development specialist to screen for potential social risks and impacts, and subsequently develop and implement social safeguards instruments as needed. The frequency of monitoring will be determined by the requesting agencies, but will be sufficient to allow the PCU to determine site changes, the environmental conditions and social context, the adequacy of the mitigation measures, and the overall ability of the contractor to execute the works in the specified and sustainable manner. In addition to Bank requirements, the PCU will also be responsible for ensuring the proper application of any national environmental or social requirements. The PCU should staff or train an additional environmental specialist or engineer to support environmental supervision, especially as regards inspection in the field. The PCU should hire and train a social development specialist as needed to support the management of social risks and impacts, and implementation of social safeguards requirements.

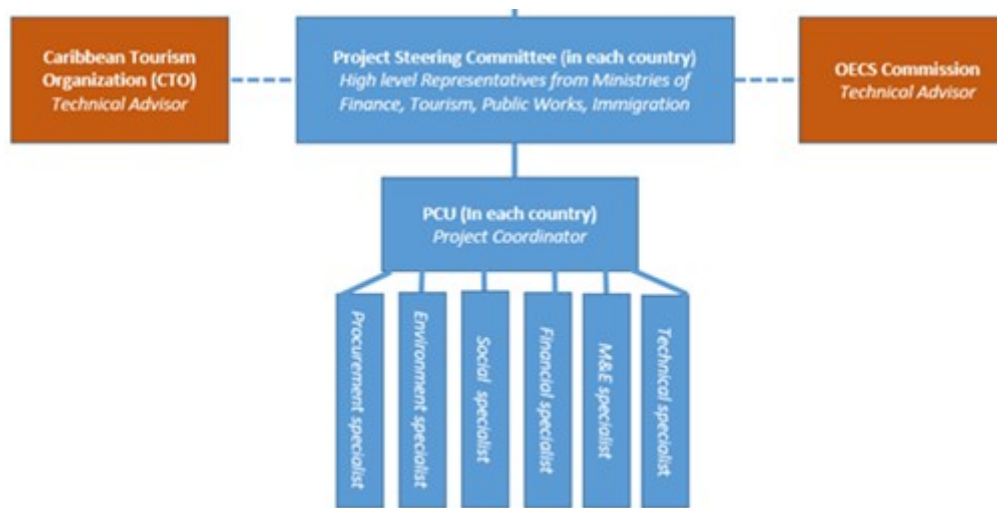


Figure 5. Project Organization Chart

Grenada, St Lucia, and St Vincent and the Grenadines have designated staff who have attended WBG training sessions and are currently involved with other Bank projects. Pre-appraisal missions by the Safeguards Specialists have engaged these local staff and discussed the need for their support in preparing the ESMF. Meetings and site visits with these staff as well as key regional experts has laid the groundwork for technical and administrative support to the Bank if any additional assessment visits or coordination meetings are needed prior to appraisal.

If deemed necessary, a separate environmental consultant (EC), social development specialist (SDS) or cultural heritage specialist (CHS) may also be contracted by the PCU to support field or desktop assessments, screening, contracting, supervision, and reporting. The EC would support the PCU in ensuring the implementation of the mitigation measures and the coordination of environmental management activities (monitoring, enforcement, audits and inspection) of the Project. The EC will have various duties as assigned by the PCU. Prior to construction this may include screening of possible projects for impacts, development of management, or other tasks. Once construction activities are underway the EC may conduct frequent or continuous inspections in the field, provide reports to the PCU, or otherwise assist with environmental and social compliance work. The PCU may staff or contract the EC as desired according to level of need and logistics.

8.0 DISCLOSURE & PUBLIC CONSULTATION

During the project preparation process, discussions were held with the PCU and with regional experts in historical resources. The results of this initial consultation process have already been included in the draft ESMF.

The next step was for stakeholder consultations as part of refining the ESMF to ensure that it is satisfactory and will serve to guide environmental aspects of the project. The comments received may include technical aspects and/or matters of importance to communities, NGOs, and other stakeholders.

The PCUs disclosed the draft ESMF on the GoG, GoSL, and GoSV websites and notified stakeholders of the time period for which comments will be accepted. Evidence of the consultation has been incorporated into the ESMF Final Version, as documented in Annex 4.

In the future as projects are implemented, additional public consultation will occur through the EIA process and through the interaction with communities. Those consultations will be part of the ongoing implementation process and will not be documented in this ESMF.

9.0 TECHNICAL REFERENCES

- Byrne, J. **St. Vincent & the Grenadines Protected Areas System Gap Assessment.** Convention on Biological Diversity Secretariat and The Nature Conservancy, First Workshop, March 9th & 10th, 2006.
- The Caribbean Conservation Association. **St. Lucia Country Environmental Profile.** St. Michael, Barbados, 1991.
- Culzac-Wilson, L. **Important Bird Areas – AMERICAS, St. Vincent and the Grenadines.** Avian Eyes, 2009.
- Knights, R.D. and Joslyn, Otis R.F. **Climate Change and Biodiversity in St. Vincent and the Grenadines.** Convention on Biological Diversity, Meeting February 25-29 2008, Panama City, Panama. February 2008.
- Government of Saint Lucia. **Physical development Act no 21 of 2001.** Government Printery, Castries Saint Lucia, 2001.
- Government of St. Vincent and the Grenadines. **Draft Environmental Management Act, 2009.**
- Government of St. Vincent and the Grenadines. **Draft Environmental Impact Assessment Regulations, 2009.**
- Government of St. Vincent and the Grenadines. **National Economic and Social Development Plan 2013-2025.**
- Government of Saint Vincent and the Grenadines. **Physical Development Act no 21 of 2001.**
- Ministry of Health, Wellness and the Environment. **National Report, Third International Conference on Small Island Developing States.** July 2013.
- Organization of American States, Saint Lucia Development Atlas. Department of Regional Development, OAS General Secretariat, Washington D.C. USA, 1987.
- Robertson, R. **Final Report on Sustainable Land Management St. Vincent and the Grenadines.** UNDP-GEF project, 2012.
- Singh, A., and Wilson J. **National Environmental Summary (NES), St. Vincent and the Grenadines, 2010.** UNEP (United Nations Environment Programme), 2010.
- SVG National Physical Development Plan: **Preliminary Methodological Framework Report.** Stephen Kemp BA, DipTP, MRTPI, FRSA 16th October 2013.

The Caribbean Conservation Association. **St. Vincent Country Environmental Profile**. St. Michael, Barbados. 1991.

Wade, A. Barry. **COASTAL ZONE MANAGEMENT, The Need for a CZM Programme, St. Vincent and the Grenadines**. Environmental Solutions Ltd. Kingston 6, Jamaica. October 10, 2013.

APPENDICES

Appendix 1 – National Law in OECS Countries

This appendix provides a detailed discussion of the legal and regulatory framework in each OECS country.

1.1 Saint Vincent and the Grenadines

In Saint Vincent and the Grenadines a number of Government and statutory agencies have responsibility for environmental management in one form or another under various pieces of legislation. Some agencies find themselves operating in grey areas or executing responsibilities that could better be managed under one agency with the relevant legal mandate.

The following matrix provides a general overview of the agencies, laws and regulations pertaining to environmental management and disaster mitigation. They cover such areas as the environment, land use, water management (including domestic, commercial, and hazardous waste management), historical and cultural patrimony, public health, and disaster response. The varied environmental management efforts have generally been fragmented and stymied in many cases by a lack of coordinated efforts, absence of empowering legislation or regulations, and financial and technical resources.

Table 1. Summary of pertinent agencies, the supporting legislations and scope of influence in Saint Vincent and the Grenadines.

Agency	Legislation	Scope
Central Water and Sewerage Authority [Ministry of Health Wellness and the Environment]	<ul style="list-style-type: none"> • <i>Central Water and Sewerage Act</i> (No.6, 1978), amended in 1992 • <i>Central Water and Sewerage Authority Act</i> (No.17, 1991) 	Make better provision for the conservation, control, apportionment, and use of water resources of SVG.
Ministry of Health Wellness and the Environment [Solid Waste Management Unit]	<ul style="list-style-type: none"> • <i>Environmental Health Services Act</i> (No.14, 1991) • <i>Environmental Impact Assessment Regulations (Draft, 2009)</i> • <i>Environmental Management Act</i> (Draft, 2009) • <i>Waste Management Act</i> (No.31, 2000) 	<p>Make provision for the conservation and maintenance of the environment in the interest of health generally and in particularly in relation to places frequented by the public</p> <p>The SWMU was established in November, 1999 to execute the activities under the “Organization of Eastern Caribbean States (OECS) Solid and Ship-generated Waste Management Project” and is also currently responsible for the collection and disposal of Solid waste on St. Vincent. In addition, the SWM Unit is responsible for the</p>

		development of waste management facilities on the Grenadine islands of Bequia, Union Island and Canouan.
Ministry of Agriculture, Rural Transformation Forestry and Fisheries	<ul style="list-style-type: none"> • <i>Fisheries Act</i> (No.8, 1986), & later amendments (No.32, 1986, and No.25, 1989) • <i>Forest Resource Conservation Act</i> (No.47, 1992) 	<p>Promotion and management of fisheries and matters pertaining there to.</p> <p>To provide for the conservation, management and proper use of the forest and watersheds, declaration of forest reserves, cooperative forest and conservation areas.</p>
Ministry of Agriculture, Rural Transformation Forestry and Fisheries [Forestry]	<ul style="list-style-type: none"> • <i>Marine Parks Authority Act</i> 1997 (No.33, 2002) • <i>Natural Forest Resource Act</i> (1947) • Wildlife Protection Act (No.16, 1987) & later amendments (1988, 1991) • Wildlife Conservation Act (1991) 	<p>The establishment of Marine Parks and other related matters.</p> <p>Providing for the protection of wildlife and any connected issues.</p> <p>The conservation and sustainable management of the Nation's forest, wildlife and national park resources</p>
Ministry of Tourism and Culture	<ul style="list-style-type: none"> • <i>National Parks Act</i> (No.33, 2002) • <i>National Parks (Amendment) Act</i> (No.13, 2010) 	To preserve, manage, protect and develop the natural and cultural heritage of SVG, including the historical and cultural heritage of the Island
Ministry of Housing, Informal Human Settlement, Physical Planning, Lands and Surveys [PPU]	<ul style="list-style-type: none"> • <i>Town and Country Planning Act</i> (No.45, 1992) 	<i>The Town and Country Planning Act</i> (No.45, 1992) guides planning in St. Vincent & the Grenadines. Under this act, the PPU has the legal authority for environmental management in general, including the evaluation of the need for and level of EIA requirements.
The Sustainable Development Unit of the Ministry of Economic Planning, Sustainable Development, Industry, Information and Labour houses most of the focal point for these conventions.	<p>United Nations Conventions</p> <ul style="list-style-type: none"> • UNCBD • UNCCD (Now resides with the Forestry Department of the Ministry of Agriculture, Rural Transformation Forestry and Fisheries) • UNFCCC 	<p>Convention for the protection of biological diversity.</p> <p>Convention to combat desertification.</p> <p>Convention to reduce greenhouse gas emissions.</p> <p>Convent against land based sources of marine pollution.</p>

	<ul style="list-style-type: none"> • Cartagena Convention Now resides with the Forestry Department of the Ministry of Agriculture, Rural Transformation Forestry and Fisheries • – LBS protocol (Public Health Department of the Ministry of Health, Wellness and the Environment) 	
<p>The Sustainable Development Unit of the Ministry of Economic Planning, Sustainable Development, Industry, Information and Labour</p> <p>[The SGD has reporting requirements for all Ministries of Government]</p>	<ul style="list-style-type: none"> • St. Georges Declaration of Principles for Sustainable Development (SGD) in the Organization of the Eastern Caribbean States (OECS) of 2001. 	<p>This sub-regional agreement is designed to support sustainable development and covers a wide range of environmental issues including ... the Multilateral Environmental Agreements (MEAs)</p>

St. Vincent & the Grenadines has legislation in place to address environmental and social development issues within respective jurisdictions. *The Town and Country Planning Act* (No.45, 1992) was initiated to guide planning in St. Vincent & the Grenadines and falls under the jurisdiction of Ministry of Housing, Informal Human Settlement, Physical Planning, Lands and Surveys. Under the Act, Article 29, an EIA for environmentally sensitive projects or activities is required.

The Physical Planning Unit (PPU) has the legal authority for environmental management in general under this Act, including the evaluation of, the need for and level of EIA required. In St. Vincent & the Grenadines there is no grading system for projects requiring EIA but the scope of the EIA is determined through discussion with the PPU.

The PPU functions as the technical/advisory arm of the Physical Planning and Development Board (PPDB), the body that oversees national development. The Act gives the Minister the ultimate and final decision on any planning matter. The Chair, Deputy Chair and Committee member of the PPDB are civil society member with the Town Planner as Secretary. Other members of the PPDB include representatives from the Police, National Properties, Transport and Works (Chief Engineer), Housing and Land Development Corporation, CWSA, VINLEC, Lands and Surveys, Kingstown Town board, the Ministry of Health Wellness and the

Environment, Ministry of Agriculture and the Permanent Secretary in the Ministry of Housing. The PPU is responsible for ensuring Project development occurs within the environmental and social requirements of St. Vincent & the Grenadines. As part of its regular responsibilities, the PPU will review the EIA and development applications as well as oversee all other development control related matters, from inspection, to monitoring and enforcement.

The Physical Planning and Development Board (PPDB) has the legal authority for carrying out the purpose and provisions of the *Town and Country Planning Act*. Within this piece of legislation lies the authority of the Planning Department to "... make provision for the orderly development of land, the assessment of the environmental impacts of development, the grant of permission to develop land and for other powers to regulate the use of land, and for related matters."

As a signatory to the MEAs and SGD, Saint Vincent and the Grenadines has obligations to reduce its greenhouse gas emissions, protect and sustainably manage its biological diversity, prevent land degradation and ensure that livelihood issues are not threatened or compromised. The National Environmental Management Strategy and the National Economic and Social Development Plan 2013-2025 speaks to environmental sustainability; as a consequence, all activities under the RDVRP must respect and respond to these declarations and pronouncements.

1.2 Saint Lucia

In Saint Lucia a number of Government and statutory agencies have responsibility for environmental management in one form or another under various pieces of legislation. Some agencies find themselves operating in grey areas or executing responsibilities that could better be managed under one agency with the relevant legal mandate. As an example, the national responsibility for landslide rehabilitation is disjointed, with the main responsibility for road and settlement falling with the Ministry of Infrastructure, while the responsibility for landslides occurring in the Forest Reserve being that of the Forestry Department. Landslides occurring on private forested lands remain the responsibility of private owners while the Ministry of Agriculture through its engineering division provided some support to farmers whose farms or feeder roads were affected by landslides⁹.

The following provides a general overview of the agencies, laws and regulations pertaining to various sections that have relevance to environmental management and as well as to disaster mitigation. They cover such areas as environmental, land use, water management, domestic, commercial, and hazardous waste management, historical and cultural patrimony, public health, and disaster response. The varied environmental management efforts have generally been fragmented and stymied in many cases by a lack of coordinated efforts, clear or absent empowering legislation or regulations, and financial and technical resources.

Table 2 below summarizes a number of pertinent agencies, their responsibilities, and enabling legislation.

⁹ Meeting with Adam Toussaint Dep Chief forestry officer on 15 May, 2013

Table 2. Agencies with Environmental Management Responsibilities

Agency	Responsibility	Legislation
Ministry of Physical Development, Housing, and Urban Renewal	This Ministry has responsibility through the functions of its various departments/ sections which impact directly on the management of the country’s natural resources. The Physical Planning section is the technical arm of the Development Control Authority (DCA). The Ministry is also responsible for the implementation of the Saint Lucia Building Codes and guidelines which are supposed to provide guides for best construction practices.	The Physical Planning and Development Act No 21 of 2001
Development Control Authority	The Board of the Development Control Authority the power to review and decide on development proposals that are brought to it by its technical secretariat, the Physical Section of the Ministry of Physical Development. The relevant Act provides the legislated authority to make provision for the development of land, the assessment of the environmental impacts of development, the grant of permission to develop land and for other powers to regulate the use of land, and for related matters.	The Physical Planning and Development Act No 21 of 2001 (amended 2005) which superseded the 1971 Land Interim Development Control Act. Amendments to the 1971 Land Interim Development Control Act
Ministry of Health, Wellness, Human Services, and Gender Relations	Through its Environmental Health Department, it has the responsibility for reviewing plans, monitoring and enforcing public health and sanitation regulations and practices, and promoting public awareness on matters relating to public health and the environment. These include practices that affect health such as food preparation, sanitation, solid waste management, liquid and solid waste disposal, dust and air pollution, water quality, some occupational health and safety matters.	Public Health Act of 1975 and attendant Regulations to present. No. 10, 11, 12, 13, 14, 15, 16, 18, 20, 21, and 22 of 1978]:Public Health [Nuisances] Regulations. Public Health [Offensive Trades] Regulations: Public Health [Communicable and Notifiable Disease] Regulations: Public Health [Water Quality Control]

		<p>Regulations: Public Health [Apartment Houses, Guest Houses and Hotels]</p> <p>Regulations: Public Health [Swimming Pools]</p> <p>Regulations: Public Health [Disposal of Offensive Matter]</p> <p>Regulations: Public Health [Sewage and Disposal of Sewage and Liquid Industrial Waste Works] Regulations</p>
Pesticides Control Board (in the Ministry of Agriculture)	Pesticides Control Board in the Ministry of Agriculture and is responsible for monitoring the importation and use of various chemical substances.	The Pesticides and Toxic Chemicals Control Act 1975
Saint Lucia National Trust	This statutory body has responsibility for the conservation and management of buildings and objects of historical and architectural value as well as areas of natural and scientific importance. The Trust is responsible for protecting and promoting the patrimony of the country. It manages the Pigeon Island National Landmark, the Praslin Protected Landscape, and the Maria island and Frigate Island Nature reserves.	National Trust Act 1975
Saint Lucia Solid Waste Management Authority	A statutory authority with the responsibility for providing a coordinated and integrated systematic approach to collection, treatment, disposal, and recycling of wastes including hazardous wastes. The Authority is also responsible for the management of two sanitary disposal sites, one in the north at Deglos, and the other in the south in Vieux Fort. ,	The St. Lucia Solid Waste Management Authority Act No 8 of 2004, Amendment of No 10 of 2007
Ministry of Agriculture , Food Production, Fisheries, and Rural	This Ministry has wide ranging management responsibilities relating to the conservation and management. The	Forest Soil and Water Conservation Ordinance 1946

Development (formerly Ministry of Agriculture Forestry and Fisheries)	Forestry Department is responsible for terrestrial ecosystems and resources, flora and fauna in particular legislated reserves on public or private lands such as forest reserve and water catchment areas, water abstraction, and public awareness. The Fisheries Department has similar responsible for the coastal marine environment and is heavily involved in education of fishers. They also have some responsibilities for some riverine environments.	(amended in 1957 and 1983) Fisheries Act 1984 Wildlife Protection Act 1964
Ministry of Infrastructure, Port Services, and Transport	This Ministry is primarily responsible for the provision and maintenance of major infrastructure (roads and drains) within the state. It also issues licences for the extraction of sand from beach areas. The Ministry is responsible for the provision and management of technical services in the areas of communications, meteorology, transport, electrical safety, roads, hydraulic and building infrastructure, and utilities. The Chief Engineer represents the Ministry on the Development Control Authority and the National Emergency Management Advisory Committee (NEMAC).	Motor Vehicle and road Traffic Act 2003 Beach Protection Ordinance 1963
Sustainable Development, Energy, Science and Technology	The Ministry of Public Service, Sustainable Development, Energy, Science and Technology is the government body responsible for the following-up of the international commitments signed by Saint Lucia related with environmental issues, including the Climate Change Convention (UNFCCC). The Sustainable Development, Energy, Science and Technology Section oversees all matters relating to sustainable development within the country and ensure that the various protocols are adhered to. It is the lead environmental agency in the country and spearheads the National Environmental Policy (NEP), National	

	<p>environmental Management strategy (NEMS), the national Climate Change Committee (NCCC), and other initiatives related to biodiversity, marine and terrestrial pollution, energy efficiency, sustainable development and environment.</p>	
<p>The Caribbean Environmental Health Institute (CEHI), now called Caribbean Public Health Authority- now CARPHA</p>	<p>The Caribbean Environmental Health Institute, now called Caribbean Public Health Authority (CARPHA), is a regional CARICOM institution and a lead agency in matters related to water quality and water pollution control. It has been involved in testing for and quantifying various inputs into the coastal waters of the island and establishing monitoring and controls especially as part of water quality monitoring programmes. It collaborates with the Ministry of Health performing testing and analysis for that ministry as well as other ministries, agencies, and the private sector who may wish to employ its technical services. This organization is has a well equipped laboratory to assist its functions. The Ministry of Health relies on the Caribbean Environmental Health Institute (CEHI) to perform many of its analytical functions. CEHI also provides technical assistance and support to water resource management initiatives.</p>	
<p>The National Emergency Management Office (NEMO)</p>	<p>The role of the National Emergency Management Organisation [NEMO] is to develop, test and implement adequate measures to protect the population of Saint Lucia from the physical, social, environmental and economic effects of both natural and man- made disasters from Hurricanes, to landslides, to oil spills and fires. Its responsibility is to ensure the efficient functioning of preparedness, prevention, mitigation and response actions. NEMO is responsible</p>	<p>Disaster Management Act No. 30 of 2006</p> <p>Emergency Powers (Disasters) Act No. 5 of 1995</p>

	for preparing and managing the National Emergency Management Plan. NEMO is the chair of the National emergency Management Advisory Committee which convenes whenever there is a national emergency.	
Saint Lucia National Trust	The Trust is a statutory body established in 1975 and is charged with protecting and promoting natural and cultural heritage and manages sites such as the historical Pigeon Island National Landmark and the Maria Islands Nature Reserve. The Trust has developed the System Plan for Saint Lucia, and is also trying to document and preserve the Architectural Heritage of Saint Lucia. While the Trust is a referral agency for The DCA, and also in the vocal manner in which it voices its opinion on matters where it believes the matter of national heritage or preservation has threatened.	The St.Lucia National Trust Act of 1975
The Archaeological and Historical Society	The Archaeological and Historical Society is an NGO founded in 1954. It is custodian of many of Saint Lucia's archaeological and historical collections and is supposed to serve as a "Preserver of Records". The area of preservation of historical buildings and sites has remained a grey one between the Society and the Trust, and this has caused some conflict at times. The Society also promotes itself as the custodian of underwater archaeological sites as well.	
Water and Sewerage Company Limited (WASCO)	WASCO is responsible for the provision of potable water to the country, provision and management of potable water infrastructure, along with sewerage management / waste water services. The company is responsible for the management of the John Compton Dam and a number of intakes around the country.	Water and Sewage Act 2005 with amendment in 2008
Labour Department -	This department is responsible for	Employees

Occupational Health and Safety Section	standards of occupational health and safety in places of employment and providing inspection of food handling premises.	[Occupational Health and Safety] Act, No. 10, 1985.
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The Physical Planning and Development Act (No. 29, 2001) is the act that guides the Development Control Authority (DCA) and the Physical Planning Section. Environmental Impact Assessments are requested under Section 22 of the Act and the list of undertakings that require an Environmental Impact Assessment (EIA) as part of the consideration for approval are listed in Schedule 4 of the Act, as follows:

1. Hotels of more than the number of rooms specified in the Regulations;
2. Sub-divisions of more than the number of plots specified in the Regulations;
3. Residential development of more than the number of units specified in the Regulations;
4. Any industrial plant which in the opinion of the Head of the Physical Planning and Development Division is likely to cause significant adverse impact on the environment;
5. Quarrying and other mining activities;
6. Marinas;
7. Land reclamation, dredging and filling of ponds;
8. Ports;
9. Dams and reservoirs;
10. Hydro-electric projects and power plants;
11. Desalination plants;
12. Water purification plants;
13. Sanitary land fill operations, solid waste disposal sites, toxic waste disposal sites and other similar sited;
14. Gas pipeline installations;
15. Any development projects generating or potentially generating emissions, aqueous effluent, solid waste, noise, vibration or radioactive discharges;
16. Any development involving the storage and use of hazardous materials;
17. Coastal zone developments;
18. Development in wetlands, marine parks, national parks, conservation areas, environmental protection areas or other sensitive environmental areas.

The Physical Planning Section of the Ministry is guided by this legislation and after soliciting an EIA based on the type of development, will circulate the report to a number of referral agencies which are made up of some of the other agencies and statutory bodies with some responsibility for environmental management and safeguard and who would have assisted in contributing to the Terms of Reference for the study. The study will be reviewed for its adequacy and the agencies may make additional recommendations if necessary. The final decision on any proposed development application or an EIA is made by the Board of the Development Control Authority

(DCA) who may approve the EIA with its recommendations and measures, along with the recommendations and measures of the referral agencies. The Development Control Authority (DCA) is empowered under the Physical Planning and Development Act No 29 of 2001 to consider and grant approval for all development within the state (Interview DPPS-MPDH, Executive Secretary- DCA). The DCA is made up of a government appointed Board of various professional interest and main technical government offices which also includes the Chief Engineer of the Ministry of Infrastructure or his representative.

However, the Ministry of Infrastructure has the responsibility for undertaking activities relating to the construction and management of major infrastructural works. This ministry does not apply to the DCA for approval as they are of the opinion that all such works are exempted under the Planning Act's third Schedule. It has also been suggested that since the Chief Engineer sits on the DCA Board, he can so inform the Board of the various works as a matter of courtesy. While the Ministry of Infrastructure may ask for an EIA for works done by a consultant if it so desires, it does not request one for projects done in house within the Ministry.

It is the responsibility of the DCA to monitor development, either singularly, or as part of a monitoring team, to evaluate the level of compliance by the developer with the approval granted and the attendant conditions. But this becomes an issue, even in respect to the EIA, when the other agencies already have their own mandates, heavy workloads, and deadlines. Overall, the DCA and the Ministry of Infrastructure must work closely together with the understanding that their mutual responsibilities lie in the welfare of the nation. With an understanding of this fact to guide discussions, it may be feasible for the Ministry of Infrastructure to submit plans along with environmental statements to the DCA for quick review in order that the DCA can revert with pertinent recommendations in a timely manner. It must be appreciated by the DCA that such projects require priority review and facilitation for the wider public benefit.

1.3 Grenada

There are several different agencies involved in activities that impact on the environment, however only eight (five Government Departments and three Statutory Bodies) are directly involved in environmental management activities on a daily basis, as shown in Table 1.

The current approach to Environmental management in Grenada is sectoral in nature. The Ministry of Health and the Environment has the primary responsibility for the environment along with some twenty agencies, inclusive of Government departments, nongovernmental organisations (NGOs) and statutory bodies (Physical Planning Unit – Draft Sectoral Report on the Environment, 2000).

The legislative framework for environmental management reflects the fragmentation of the institutional framework. A review of the environmental legislation in Grenada (Alexis, 2000) concluded that "... most of the laws ... are sectoral and decentralized ... while they have environmental application, they were not legislated to address those concerns and are mainly incidental to environmental management."

Table 1 - Agencies with responsibility for Project Approval and/or Implementation* and Environmental Management

DEPARTMENT/MINISTRY/ORGANISATION	MANDATE/RESPONSIBILITY
Physical Planning Unit , Ministry of Communication, Works, Physical Development, Public Utilities, ICT and Community Development	To protect and enhance the Nation's investment in infrastructure. Physical development, public utilities, communications, works, and community development.
Fisheries Division -Ministry of Agriculture, Natural Resources, Physical Planning & Fisheries	Provide efficient, effective, quality services to the agricultural community (farming, fishing, forestry) to stimulate maximum production for local consumption, export and increased incomes through the sustainable use of natural resources.
Land Use Division -Ministry of Agriculture, Natural Resources, Physical Planning & Fisheries	Provide efficient, effective, quality services to the agricultural community (farming, fishing, forestry) to stimulate maximum production for local consumption, export and increased incomes through the sustainable use of natural resources.
Environmental Health Department - Ministry of Health and Social Security	To encourage the improvement, protection, maintenance and preservation, of our fragile ecosystems on a sustainable basis.

Grenada now has in place several pieces of legislation to protect its environment. The most relevant ones to the project are: the Physical Planning and Development Control Act No 25, of 2002; the Public Health Act of 1958 and the litter Abatement Act of 1973, which has been supplemented by the passage of the Waste Management Act 2001 addressing pollution control and the abatement of litter; the 1986 Fisheries Act; and the 1990 National Parks and Protected Areas Act. Every one of those legislations has been playing important resource management roles, which, to some extent, has contributed to the enhancement and conservation of the natural environment and the preservation of public health and safety in Grenada. Nevertheless, only two of those legislations (the Waste Management Act No 16 of 2001 and the Physical Planning and Development Control Act, No25, of 2002) include provisions for environmental impact assessment (EIA).

It is important to note here that according to both Acts, the legal responsibility for environmental impacts assessments and development control in general is shared between none other than the current Physical Planning and Development Control Authority (PPDA) and the Minister responsible for Planning (Act16:15-17 and Act25:25&28). That Minister is responsible for

making regulations and appeals. The PPDA is responsible for everything else, with the support of the Physical Planning Unit functioning as its staff.

The Physical Planning and Development Control Act No25, of 2002 stands out for its overall responsibility for land use management in general. It makes fresh provision for the control of physical development, to continue the Land Development Authority, to require the preparation of physical plans for Grenada, to protect the natural and cultural heritage, and for related matters. The Physical Planning and Development Authority (PPDA) is set up under the Act with regulatory powers over any development taking place in, on, under or over the land.

Part 4 of the Act makes provision for the preparation of Environmental Impacts Assessment. The second schedule (section25 (2)), lists a total of 18 matters for which an Environment Impact Assessment is normally required, as follows:

1. Hotels of more than 50 rooms
2. Sub-divisions of more than 10 lots
3. Residential development of more than 25 units
4. Any industrial plant which in the opinion of the Authority is likely to cause significant adverse environmental impact
5. Quarrying and other mining activities
6. Marinas
7. Land reclamation, dredging and filling of ponds
8. Airports, ports and harbors
9. Dams and reservoirs
10. Hydro-electric projects and power plants
11. Desalination plants
12. Water purification plants
13. Sanitary landfill operations, solid waste disposal sites, toxic waste disposal sites and other similar sites
14. Gas pipeline installations
15. Any development generating or potentially generating emissions, aqueous effluent, solid waste, noise, vibration or radioactive discharges
16. Any development involving the storage and use of hazardous materials
17. Any coastal zone development
18. Any development in wetlands, marine parks conservation areas, environmental protection areas or other sensitive environmental areas.

According to the Act, the Authority (meaning the Physical Planning and Development Control Authority) can request an EIA in respect of any development application including application for approval in principle, if the proposed development could significantly affect the environment (Subsection1). The Physical Planning Department authorized under the Planning and Development Authority authorized by Act No. 25 of 2002 has the primary responsibility to issue environmental permits for development or construction. Activities or projects that require an EIA (Environmental Impact Assessment) are listed in Annex 2. In practice an EIA is created only in private sector developments, and the relevant Line Ministries are consulted to provide input into the evaluation of the EIA.

The PPDA functions as the national agency for the identification, protection, conservation and rehabilitation of the natural and cultural heritage in accordance with the United Nations Educational, Scientific and Cultural Organization. It is a convention for the protection of the World Cultural and Natural Heritage, to which Grenada is a party.

To ensure that environmental guidelines are adhered to, the proposed projects should be examined by the agency responsible for approval of development projects in Grenada, the Physical Planning Department, as well as the Ministry of Health, Ministry of Works, Ministry of Economic Development, prior to implementation to identify proposed environmental issues and put in place mitigation measures. Other responsible agencies should also be consulted as necessary.

Appendix 2 – Guidelines for Preparing an EIA

Public Involvement

The environmental process should be a public and transparent process in which citizens are involved as it is citizens that will be impacted. Most major projects will have impacts, negative and positive, on the community in which it is located and immediately surrounding communities; however, some projects may have more far-reaching effects; therefore, public involvement may need to be national and not just in affected communities. Ecologic, social and economic impacts need to be properly evaluated for the proposed project and alternatives. The scoping process or a process that decides what issues are important to the project and that should be addressed in environmental documents including Environmental Impact Assessment (EIA) must involve citizens. Additionally, the public should also be allowed to comment on EIAs for moderate to large scale projects during a comment period and their comments addressed in a follow-up document.

A brief background of the project must be provided early on in any documentation. The project must be clearly defined and all issues/impacts presented and evaluated in an unbiased manner. Maps, graphics, photographs, site plans, renderings and other data should be included in any documentation. Impacts on natural resources like soils, water, vegetation, terrestrial and marine species clearly defined. Social impacts should also be presented. Impacts on transportation, infrastructure, energy, drainage, sewage, education, health, safety, noise, security, land use, planned projects, community facilities, utilities, cultural and historical resources and community character must be presented and analysed. All economic impacts must also be presented with supporting data/studies, etc. Importantly, alternatives to the proposed project must be presented and evaluated.

The description of the proposed action should include:

1. The purpose or objective of the action, including any public need for, or public benefits from the action, including social and economic considerations;
2. The location and physical dimensions of the action;
3. The background and history of the action, or site;
4. Timing and schedule for implementing the action, including construction and operations phases, to the extent the information is available, or can reasonably be estimated;
5. Relationship of the action to land use plans, zoning restrictions, and other adopted plans and programs at the local or regional level; and
6. Identification of authorizations permits and approvals required.

For the restoration of historic Fort George and Fort Charlotte, the EIA should include a Physical Cultural Resources Management Plan (PCRMP) to guide those activities. The PCRMP should integrate the extensive identification and assessment work previously done as part of the nomination dossier for UNESCO World Heritage Site status. TORs for future EAs will specify extensive consultation and coordination with the national Tourism and Cultural Ministries, the

National Trusts, Planning and Development authorities, and other local organizations, as well as review of previous work and consultation with international organizations including ICOMOS, UNESCO, and IUCN. Local experts have already been engaged to develop preliminary rehabilitation plans for historic sites, and these will be defined further in consultation of EAs to develop the final renovation designs and corresponding PCRMPs for key high visibility projects. The EA TORs should reference WBG's EHS Guidelines for Tourism and Hospitality Development as well as UNEP's Guidance on Sustainable Coastal Tourism, and must build on existing country and regional environmental policies for tourism development and coastal zone management.

Appendix3–Typical Environmental Contract Clauses

The following are standard environmental related clauses that may be appended to or incorporated into the contracts for the small civil works which have been determined to be of minimal environmental impact. These mitigation measures are the core of a generic, standardized EMP (Environmental Management Plan) for these types of small works and the typical associated minor impacts which can be routinely addressed with best industry practice. These clauses are general and may be modified to conform to applicable Saint Vincent and the Grenadines laws and contract procedures for such works and shall remain in force throughout the contract period. These mitigation measures are intended for relatively simple environmental management issues and are based on best management practice and industry standards. These are the mitigation measures which are expected of all professional contractors who are performing civil works, and represent the minimum standard of execution for environmental protection during the execution of such works. (Specific project related recommendations may also be forthcoming from statutory permitting agencies such as the PPDB or the Ministry of Health, and these can be reformatted in to contract clauses as well. Finally, if an EIA has been conducted for a particular sub-project due to its environmentally sensitive or complex nature, then the specific recommendations for mitigation measures in that EIA should also be included as contract clauses.)

1. Permits and Approvals

The contractor shall be responsible for ensuring that he or she has all relevant legal approvals and permits required to commence works.

2. Site Security

The contractor shall be responsible for maintaining security over the construction site including the protection of stored materials and equipment. In the event of severe weather, the contractor shall secure the construction site and associated equipment in such a manner as to protect the site and adjacent areas from consequential damages. This includes the management of onsite, construction materials, construction and sanitary wastes, additional strengthening of erosion control and soil stabilization systems and other conditions resulting from contractor activities which may increase the potential for damages.

3. Discovery of Antiquities

If, during the execution of the activities contained in this contract, any material is discovered onsite which may be considered of historical or cultural interest, such as evidence of prior settlements, native or historical activities, evidence of any existence on a site which may be of cultural significance, all work shall stop and the supervising contracting officer shall be notified immediately. The area in which the material was discovered shall be secured, cordoned off, marked, and the evidence preserved for examination by the local archaeological or cultural authority. No item believed to be an artifact must be removed or disturbed by any of the workers.

Work may resume, without penalty of prejudice to the contractor upon permission from the contracting officer with any restrictions offered to protect the site.

4. Worker Occupational Health and Safety

The contractor shall ensure that all workers operate within a safe environment. Sanitation facilities shall be provided for all site workers. All sanitary wastes generated as a result of project activities shall be managed in a manner approved by the contracting officer and the local authority responsible for public health. The contractor shall ensure that there are basic medical facilities on site and that there are staff trained in basic first aid. Workers must be provided with the necessary protective gear as per their specific tasks such as hard hats, overalls, gloves, goggles, boots, etc. The contractor shall provide the contracting officer with an occupational health and safety plan for approval by the local health authority prior to the commencement of site activities.

The contractor must ensure that all workers operate within a safe environment. All relevant Labour and Occupational Health and Safety regulations must be adhered to ensure worker safety. Sanitary facilities must be provided for all workers on site. Appropriate posting of information within the site must be done to inform workers of key rules and regulations to follow.

5. Noise Control

The contractor shall control noise emissions generated as a result of contracting activities to the extent possible. In the case of site locations where noise disturbance will be a concern, the contractor shall ensure that the equipment is in good working order with manufacturer supplied noise suppression (mufflers etc.) systems functioning and in good repair. Where noise management is a concern, the contractor shall make reasonable efforts to schedule activities during normal working hours (between 8 am and 5 pm). Where noise is likely to pose a risk to the surrounding community either by normal works or working outside of normal working hours or on weekends, the contractor shall inform the contracting officer and shall develop a public notification and noise management plan for approval by the contracting officer.

Specific elements of the noise control activities by the contractor shall include: construction/ work activities will occur within specified daylight hours e.g. 8:00 am to 4:00pm; community / public to be informed in advance of any work activities to occur outside of normal working hours or on weekends; sites should be hoarded wherever possible; during operations, the engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed as far away from residential areas as possible; there will be no excessive idling of construction vehicles at sites; noise suppression equipment or systems supplied by manufacture will be utilized; ensure all vehicles and equipment are properly serviced; the contractor must develop and implement a public notification and noise management plan.

6. Use and Management of Hazardous Materials, fuels, solvents and petroleum products

The use of any hazardous materials including pesticides, oils, fuels and petroleum products shall conform to the proper use recommendations of the product. Waste hazardous materials and their

containers shall be disposed of in a manner approved by the contracting officer. A site management plan will be developed by the contractor if the operation involves the use of these materials to include estimated quantities to be consumed in the process, storage plans, spill control plans, and waste disposal practices to be followed. This plan and the manner of management are subject to the approval of local authority responsible for safety, and waste management, and the contracting officer.

Elements of the hazardous materials management shall include: contractor must provide temporary storage on site of all hazardous or toxic substances in safe containers labeled with details of composition, properties and handling information; the containers of hazardous substances shall be placed in an leak-proof container to prevent spillage and leaching; the wastes shall be transported by specially licensed carriers and disposed in a licensed facility; paints with toxic ingredients or solvents or lead-based paints will not be used; banned chemicals will not be used on any project.

7. Use and Management of Pesticides

The project will not fund activities that involve the purchase or use of significant quantities of pesticides. For incidental, minor use of pesticides, the use of pesticides shall be approved by the contracting officer and shall conform to the manufacturers' recommendations for use and application. Any person using pesticides shall demonstrate that they have read and understood these requirements and are capable of complying with the usage recommendations to the satisfaction of the contracting officer. All pesticides to be used shall conform to the list of acceptable pesticides that are not banned by the relevant local authority.

If termite treatment is to be utilized, ensure appropriate chemical management measures are implemented to prevent contamination of surrounding areas, and use only licensed and registered pest control professionals with training and knowledge of proper application methods and techniques.

8. Use of Preservatives and Paint Substances

All paints and preservatives shall only be used with the approval of the contracting officer. Information shall be provided to the contracting officer who describes the essential components of the materials to be used so that an informed determination can be made as to the potential for environmental effects and suitability can be made. Storage, use, and disposal of excess paints and preservatives shall be managed in conformance with the manufacturers' recommendations and as approved by the contracting officer. The contractor shall provide the contracting officer with a list of materials and estimated quantities to be used, storage, spill control and waste disposal plans to be observed during the execution of the contract. This plan is subject to the approval of the contracting officer.

9. Use of Explosives

Use of explosives shall be at the approval of the relevant local authority and shall be supervised and undertaken by a qualified explosives technician. Blasting will be limited to between the

hours of 9:00am and 4:00 pm unless specifically approved by the local authority and the contracting officer. Any use of explosives shall be permitted only after an explosives management and blasting plan has been approved by the relevant local authority and the contracting officer.

This plan shall include:

- A. Description of the explosive agent, charge description, intended use.
- B. Site safety plan including:
 - 1. Storage of initiators, booster charges and principal blasting agents
 - 2. Handling precautions to be observed
 - 3. Transport to and from site
 - 4. Security of stored materials
 - 5. Disposal of excess or damaged explosive materials.
- C. Analysis of risk to surrounding area and mitigation measures to be employed including:
 - 1. Over-pressure event
 - 2. Noise
 - 3. Flying debris
 - 4. Seismic transmission
 - 5. Accidental detonation
- D. Name and qualifications for all persons responsible for handling explosive agents

10. Site Stabilization and Erosion Control

The Contractor shall implement measures at the site of operations to manage soil erosion through minimization of excavated area and time of exposure of excavated areas, preservation of existing ground cover to the extent possible, provision of approved ground cover. Where excavations are made, contractor shall implement appropriate stabilizing techniques to prevent cave-in or landslide. Measures shall be approved by the contracting officer.

The contractor must ensure that appropriate erosion control measures such as silt fences are installed. Proper site drainage must be implemented. Any drain clogged by construction material or sediment must be unclogged as soon as possible to prevent overflow and flooding. The use of retaining structures and planting with deep rooted grasses to retain soil during and after works must be considered. The use of bio-engineering methods must be considered as a measure to reduce erosion and land slippage. Keep angle of slopes within limits of soil type. Balance cut and fill to limit steepness of slopes. All slopes and excavated areas must be monitored for movement.

All construction materials, including chemicals, must be properly stored. The contractor will establish appropriate erosion and sediment control measures such as hay bales, sedimentation basins, and / or silt fences and traps to prevent sediment from moving off site and causing excessive turbidity in nearby streams, rivers, wetlands, and coastal waters.

An erosion management plan will be required where the potential exists for significant sediment quantities to accumulate in wetlands, lakes, rivers and nearshore marine systems. This plan shall include a description of the potential threat, mitigation measures to be applied, and consideration for the effects of severe weather and an emergency response plan.

If works are along coastal marine areas or near major streams and river, water quality monitoring must be done before construction, and at regular intervals to determine turbidity levels and other quality parameters. Construction vehicles and machinery will be washed only in designated areas where runoff will not pollute natural surface water bodies.

11. Air Quality

The following conditions apply to work sites for the control of air quality including dust control:

- Construction materials such as sand, cement, or other fines should be kept properly covered.
- Cement should be kept stored within a shed or container.
- The sand and fines can be moistened with sprays of water.
- Unpaved, dusty construction roads should be compacted and then wet periodically.
- During interior demolition debris-chutes shall be used above the first floor.
- Demolition debris shall be kept in controlled area and sprayed with water mist to reduce debris dust.
- During pneumatic drilling/wall destruction dust shall be suppressed by ongoing water spraying and/or installing dust screen enclosures at site
- The surrounding environment (sidewalks, roads) shall be kept free of debris to minimize dust.
- There will be no open burning of construction / waste material at the site.
- There will be no excessive idling of construction vehicles at sites.
- The bins of all haulage vehicles transporting aggregate or building materials must be covered on all public roads.

12. Traffic Management

In the event that construction activities should result in the disruption of area transportation services, including temporary loss of roadways, blockages due to deliveries and site related activities, the contractor shall provide the contracting officer with a traffic management plan including a description of the anticipated service disruptions, community information plan, and traffic control strategy to be implemented so as to minimize the impact to the surrounding community. This plan shall consider time of day for planned disruptions, and shall include consideration for alternative access routes, access to essential services such as medical, disaster evacuation, and other critical services. The plan shall be approved by relevant local authority and the contracting officer.

Elements of the traffic management plan to be developed and implemented by contractor shall include: alternative routes to be identified in the instance of extended road works or road blockages; the public to be notified of all disturbance to their normal routes; signposting,

warning signs, barriers and traffic diversions must be clearly visible and the public warned of all potential hazards; provision must be made for the safe passages and crossings for all pedestrians where construction traffic interferes with their normal route; there must be active traffic management by trained and visible staff at the site or along roadways as required to ensure safe and convenient passage for the vehicular and pedestrian public; Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement .

13. Management of Standing Water

Under no circumstances shall the contractor permit the collection of standing water as a consequence of contractor activities without the approval of the contracting officer and consultation with the relevant local environmental health authority. Recommendations from that local authority on how to manage and treat the standing water must be implemented. The condition of the standing water must be monitored by the contractor to ensure that it does not present itself as a breeding ground for any pests such as mosquitoes.

14. Management of Solid Wastes -trash and construction debris

The contractor shall provide the contracting officer with a solid waste management plan as part of a site waste management plan that conforms to the solid waste management policies and regulations of the relevant Saint Vincent and the Grenadines authority. Under no circumstances shall the contractor allow construction wastes to accumulate so as to cause a nuisance or health risk due to the propagation of pests and disease vectors. The site waste management plan shall include a description of how wastes will be stored, collected and disposed of in accordance with current law. Additionally the contractor shall provide for the regular removal and disposal of all site wastes and provide the contracting officer with a schedule for such removal.

15. Management of Liquid Wastes

The contractor shall provide the contracting officer with a liquid waste management plan as part of a site waste management plan that conforms to the waste management policies and regulations of the relevant Saint Vincent and the Grenadines authority. Under no circumstances shall the contractor allow construction related liquid wastes to accumulate on or off the site, or to flow over or from the site in an uncontrolled manner or to cause a nuisance or health risk due to its content. The site waste management plan shall include a description of how these wastes will be stored, collected and disposed of in accordance with current law. Additionally the contractor shall provide for the regular removal and disposal of all site wastes and provide the contracting officer with a schedule for such removal.

Specific elements of the contractor's liquid waste management plan shall include: contractor to abide by all pertinent waste management and public health laws; waste collection and disposal pathways and sites will be identified for all major waste types expected from demolition and construction activities; construction and demolition wastes will be stored in appropriate bins; liquid and chemical wastes will be stored in appropriate containers separated from the general refuse; all waste will be collected and disposed of properly in approved landfills by licensed

collectors; the records of waste disposal will be maintained as proof for proper management as designed; whenever feasible the contractor will reuse and recycle appropriate and viable materials (except asbestos); construction related liquid wastes must not be allowed to accumulate on or off the site, or to flow over or from the site in an uncontrolled manner or to cause a nuisance or health risk due to its contents.

16. Special Condition - Management of Medical Wastes

In the event that the contractor discovers medical wastes, the contractor shall provide the contracting officer with a medical waste management plan as part of a site waste management plan that conforms to the waste management policies and regulations of the relevant Saint Vincent and the Grenadines health and waste management authorities. The plan shall include a description of how these wastes will be stored, collected and disposed of in accordance with current law. The contractor must ensure that all persons handling medical wastes are provided with proper protective clothing. All medical wastes must be secured in specially labelled and sealed containers, and disposed of according to relevant local legislation at specified disposal sites. Medical wastes must be kept separate from the other waste streams on site.

The waste management plan provided by the contractor must ensure that all persons handling medical wastes are provided with proper protective clothing. All medical wastes must be treated as hazardous. All medical wastes must be secured in specially labeled and sealed containers separate from other wastes streams. All medical wastes must be disposed of according to relevant local legislation at specified disposal sites.

17. Special Condition - Management of Asbestos

In the event that during the course of work activities the contractor discovers asbestos as part of the existing site that requires stabilization and removal, the contractor shall contact the relevant local authorities and the contracting officer immediately. If work has already commenced, all work in the area must stop immediately. An asbestos management plan must be prepared by the contractor and approved by the relevant local health and waste management authorities and the contracting officer describing how this material will be stored, collected and disposed of in accordance with current law, and identifying the approved experienced professional who will undertake this work. The plan must include:

- Description of the issue and extent of contamination
- Site safety measures
- Stabilization techniques to be employed
- Storage and transport plan
- Approved disposal procedure
- Worker awareness and training

In preparing the plan, the contractor should liaise with the relevant local health and waste management agencies to ensure that the adequacy of the measurements being proposed.

Site management shall consist of enclosing relevant sections of the site with appropriate material by the contractor. Where possible the asbestos and its location must be appropriately contained and sealed to minimize exposure, and any asbestos shall be marked clearly as a hazardous material. Stabilizing friable asbestos will be done prior to removal (if removal is necessary) and it will be treated with a wetting agent to minimize asbestos dust. Asbestos will be handled and disposed by skilled & experienced professionals using appropriate PPE (personal protective equipment) such as respirators and tyvec suites which will be provisioned to workers to protect them and prevent contamination with asbestos fibres. Respiratory protection together with measures to prevent the contamination of clothing and inadvertent transport of asbestos fiber off-site shall be provided to all exposed workers. If asbestos material is to be stored temporarily, the wastes should be securely enclosed inside closed containments and marked appropriately. Security measures must be implemented against unauthorized removal of asbestos from the site. No removed asbestos will be reused.

18. Special conditions - Water Pipeline Installation

The Contractor shall utilize the following measures to mitigate potential environmental, health and safety impacts during the construction and installation of the water pipeline:

- Trenching. Soil stockpiling will be done in designated areas alongside the trench using piles no higher than 2 meters, convex in shape, and located so as to minimize disturbance and hazard to passers-by or traffic. The contractor shall ensure that stockpiles do not cause damming of water or runoff, or that such stockpiles are themselves not washed away.
- Dewatering. Removal of water from trenches shall be done in such a manner to prevent the discharge of mud or sediment into any water body, or the creation of standing water bodies on lands outside the work area.
- Dust Control. During dry periods when dust is a nuisance it shall be mitigated by spraying of water onto work surfaces along the pipeline work area. Dust shall not be allowed to travel outside of the work zone.
- Traffic Control. For all works alongside roadways, appropriate safety signage and barriers shall be used to ensure the safety of any foot traffic or vehicular traffic. If the trench is exposed to foot or vehicle traffic appropriate restrictive barriers, taping, and warning signage shall be used. Traffic shall be controlled and stopped as necessary on public thoroughfares in accordance with good safety practice and national requirements. Trenches or equipment exposed to public access must be clearly demarcated and restricted to public access. Mud and sand brought onto paved public access roads shall be washed and cleared daily.
- Safety Plan. The Contractor will prepare a Health and Safety Plan which shall include emergency response and first aid procedures, awareness training suitable to the tasks being conducted, vehicle and equipment safety provisions, and personal protective equipment information. The contractor will provide hard hats, work boots, protective eyewear and gloves to workers and will ensure that they are used by workers on the job.

- Vegetation and Topsoil Clearing. If any vegetation or brush is cleared, or topsoil removed, it shall be done in such a way as to avoid disturbance or effects outside the established work area. Herbicides or burning may not be used to dispose of any cleared vegetation, rather such vegetation must be chipped, shredded, and dispersed in approved areas or hauled to an approved landfill. Should fauna be encountered work will cease until such fauna have been safely relocated. If any agricultural land is crossed, topsoil shall be stored separately and replaced by spreading on the land surface upon completion of work.
- Access Roads. No new access roads will be opened, only existing roadways will be used for all the entry and exit of materials and equipment to and from the work zone.
- Work Areas. Contractor will delineate approved work areas for all activities including excavation, stockpiling, access, equipment placement during excavation, and materials storage. Such work areas are subject to approval by the contract manager and/or supervising engineer, and Contractor may use only those lands for which approval and access has been provided by the contracting officer and/or supervising engineer. Any rental, use or acquisition of lands from private parties is not permitted without previous notification to and express written approval by the PSIMPU through application of relevant World Bank Policy.
- Vehicle and Equipment Fuelling and Maintenance. All gasoline and diesel filling, oil changing, and maintenance of vehicles and equipment will be done outside of the project area at established facilities. If fuel trucks are used they will have adequate safety equipment and fire extinguishers, be free of leaks and be fitted with appropriate dispensers, and have spill kits and absorbent materials ready to retrieve any leaked or spilled fuels. No fuel, new oil or waste oil will be stored on the work site, and vehicles will not be washed on the work site or in adjacent areas.

19. Special conditions – works in Forest Reserves

For any work in a designated Forest Reserve, the following will apply:

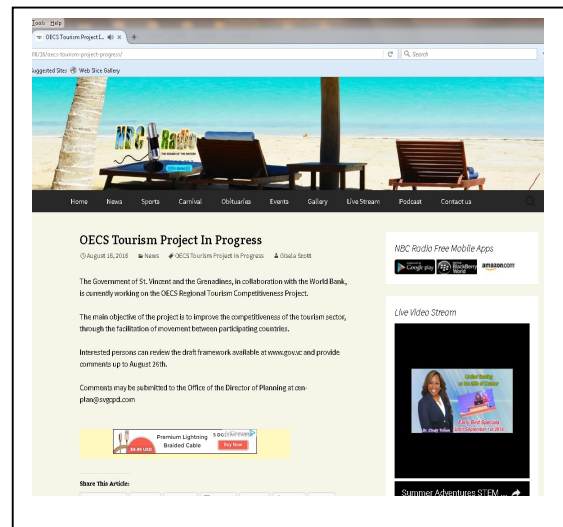
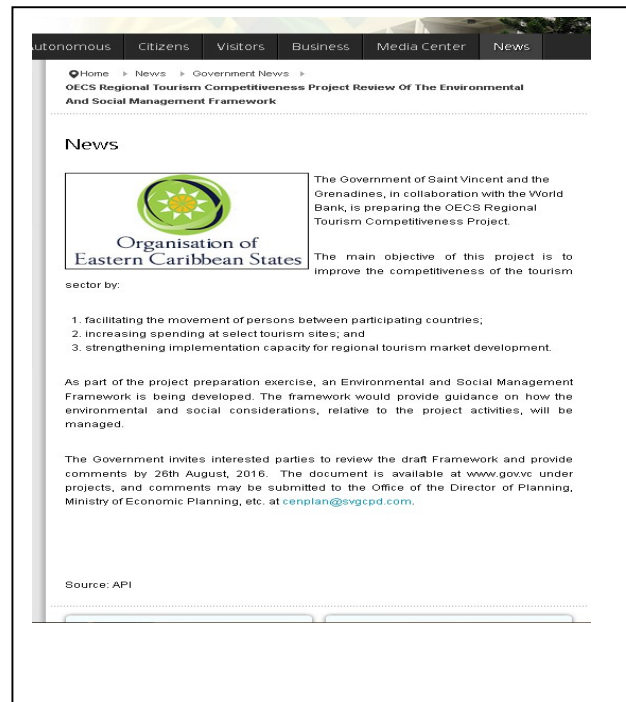
- There must be no unnecessary clearing of natural vegetation.
- Avoid the use of herbicides or other chemicals.
- Any works to be undertaken in a protected forest area must be done under the supervision of a representative of the Forestry Department.
- The contractor must ensure that any work undertaken in the forest reserve must be done by manual means.
- There must be minimal impact to flora and fauna in the forest area.
- All recognized natural habitats, wetlands and protected areas in the immediate vicinity of the activity must not be damaged or exploited.
- The contractor must ensure that all staff will be strictly prohibited from hunting, foraging, logging or other damaging activities.

- A survey and an inventory shall be made of large trees in the vicinity of the construction activity, large trees shall be marked and cordoned off with fencing, their root system protected, and any damage to the trees avoided.
- There will be no unlicensed borrow pits, quarries or waste dumps in protected areas.
- Upon completion, all wastes must be immediately removed out of the forested area.

Appendix 4 – Disclosure / Public Consultation

The draft ESMF (including the RPF) was disclosed on the government websites of Grenada, Saint Lucia, and Saint Vincent and the Grenadines at the end of July, 2016, and comments were open for a minimum of two weeks. No comments were received during the comment period, which closed at the end of August, 2016. Evidence of the public disclosure is included in this Appendix, below.

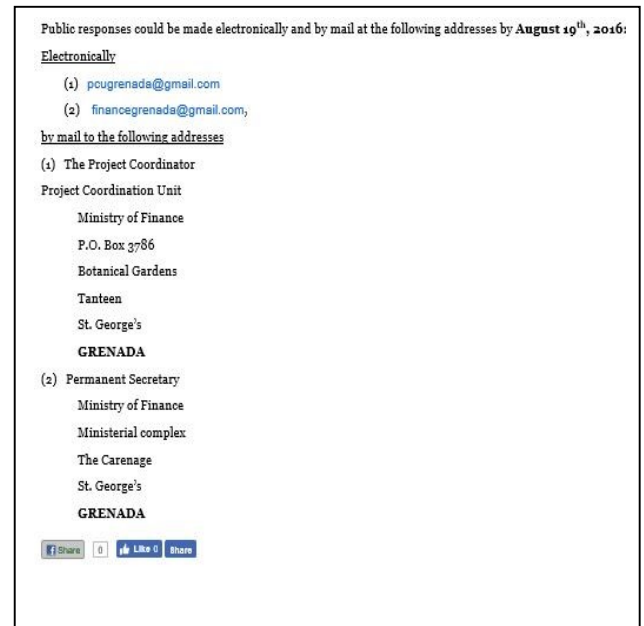
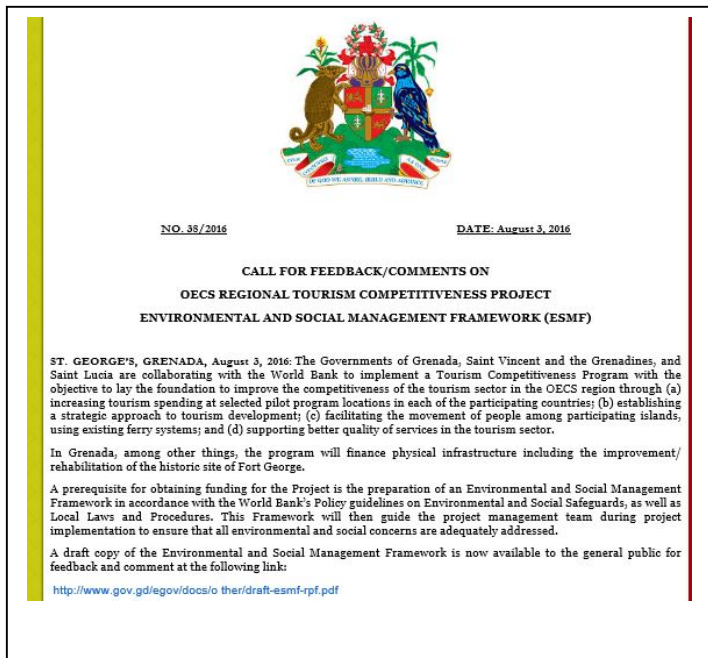
In Saint Vincent and the Grenadines, the Agency for Public Information (API) prepared a press release which was disseminated to all media houses (see screenshot of email, below, and a copy of the actual press release). In addition the announcement was read on the NBS (National Broadcasting Service) and the local media, and emails sent to key stakeholders.



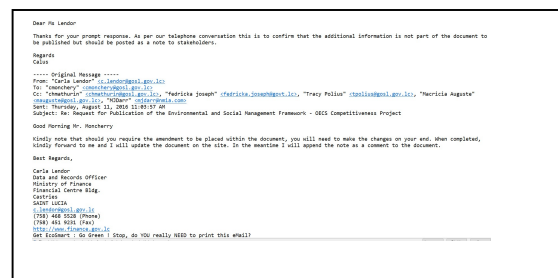
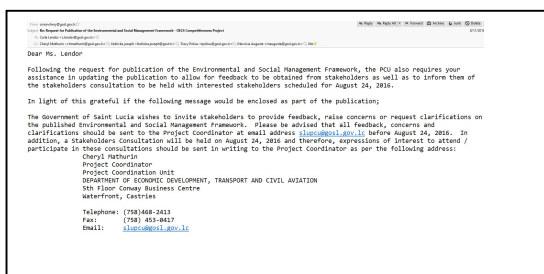
In Grenada several avenues were utilized for facilitating comments on the ESMF. The media used were as follows:

1. Via Email which was sent by the Head of Corporate Communications of Ministry of Finance, to all media houses, Newspapers, local Television stations and radio stations. This email also went out to a list of persons and stakeholders.
2. Via website www.finance.gd. please follow link: <http://www.finance.gd/index.php/17-news-release/386-190-call-for-feedback-comments-on-oecs-regional-tourism-competitiveness-project-environmental-and-social-management-framework-esmf>
3. Via facebook at <https://www.facebook.com/search/top/?q=finance%20grenada%20tourism%20competitiveness>
4. All Local Newspapers (see item 1)

Evidence of the disclosure activities appears in the images below.



In Saint Lucia the notice soliciting comments was posted on the government website. In addition the Data and Records Officer was provided with the ESMF for delivery to key stakeholders soliciting input. A notice to request a meeting with the PCU was part of the information provided as well as an electronic link the ESMF for review.



Appendix 5 – Resettlement Policy Framework (RPF)

The regional RPF (encompassing resettlement policy aspects for all three countries) follows, and comprises Annex 5 of this ESMF.

**Governments of Saint Vincent and the
Grenadines, Grenada, Saint Lucia**

OECS Regional Tourism Competitiveness Project

World Bank

**Regional Resettlement Policy Framework
(RPF)**

May 12, 2016

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1. Introduction and Objective of RPF

The World Bank is providing a Credit in the amount of US\$26M to the Governments of Saint Lucia (GoSL), Saint Vincent and the Grenadines (GOSVG), and Grenada (GOG) towards the Regional Tourism Competitiveness Project.

In the process of the preparing the OECS Regional Tourism Competitiveness Project, World Bank screening concluded that under Operational Policy 4.12 (OP 4.12) [Involuntary Resettlement], planned physical infrastructure works (e.g. rehabilitation and improvement to selected tourism sites) might involve either physical resettlement or land acquisition and subsequently impact beneficiary assets or access to assets.

The objective of this Resettlement Policy Framework (RPF) is to clarify resettlement principles, organizational arrangements, and design criteria to be applied to sub-projects to be prepared during project implementation of the OECS Competitiveness Project (see OP 4.12, paras. 26-28). Sub-project resettlement plans consistent with the policy framework subsequently will be submitted to the Bank for approval after specific planning information becomes available (see OP4.12, para.29).

Under the OECS Competitiveness project the RPF will assist the Governments of Grenada, Saint Lucia, and Saint Vincent and the Grenadines in:

- i) screening all subprojects for land acquisition and physical and/or livelihood displacement resulting from such land acquisition;
- ii) identifying documentation and preparation requirements for compliance with World Bank Safeguards Policy.

In the event that a sub-project leads to land acquisition and/or resettlement, Abbreviated Resettlement Plans (ARPs) and/or Resettlement Action Plans (RAPs), as may be applicable, will be prepared for specific sub-projects in accordance with the project's RPF. The RPF will form part of the project's Operations Manual and be referenced in the project's Legal Agreements.

2. Description of Project

The Development Objectives of the OECS Regional Tourism Competitiveness Project are to: (i) facilitate the movement of tourists within the region using ferries; (ii) improve selected touristic sites; and (iii) strengthen implementation capacity for regional tourism market development.

The Project will support the tourism competitiveness of the OECS as a region and in each participating member country. It will directly benefit entrepreneurs, people working in (and potential employees of) the tourism industry (hotels, travel agencies, taxi drivers, tourism guides), and people working in (and potential employees of) sectors related to tourism (training providers, ferry operators, small producers of artisanal souvenirs, agricultural producers). The project is also expected to create job opportunities and other income generating activities as a result of increased number of tourists, increased tourism spending and improved connectivity between the islands. The government ministries, departments and agencies, as well as the tourists visiting the OECS region are also key project stakeholders

The Project objectives will be achieved through the following four components

2.1 Project components

Component 1: Facilitation of the Movement of People (US\$ 2,670,000)

▪ This component aims to strengthen regional integration and facilitate the movement of people in the region through: (i) support for the development of a single regional space for immigration and customs entry of international tourists; (ii) development of a pilot ferry system through technical assistance, IT and small infrastructure improvements.

Sub-Component 1.1 (country-specific and regional): Development of a single regional space for Immigration and Customs entry of international tourists (US\$ 1,410,000)

- At national level, this sub-component will provide:
 - (i) infrastructure investment (works) to turn domestic terminals into international ones¹;
 - (ii) Provision of goods: scanners and other IT needs for immigration and customs clearance
- At regional level, this sub-component will provide
 - (i) TA to support:
 - a. review of the existing regional immigration system (CARISEC);
 - b. review of existing OECS Treaty for the creation of a single economic space and identification of potential regulatory and institutional gaps on the free movement of people and goods, including port charges;
 - c. develop a plan for the implementation of a Schengen Style single space.
 - (ii) TA to transition the region to a common customs and immigration clearance platform for persons, by supporting the region in identifying and agreeing on a common platform².

Sub-Component 1.2 (regional): Development of a pilot regional ferry corridor (US\$ 1,260,000)

This component will provide:

- (i) Gap financing for the operation of the ferries;
- (j) IT support for information technology software and hardware required for a centralized ferry scheduling system;
- (k) TA to review technical standards and enforcement for water transport, including safety standards; and
- (l) TA to support the dialogue between the governments and the ferry operators.

Component 2: Pilot Tourism Investments (US\$ 18,540,000)

¹ This includes small refurbishing investments in the passenger ferry terminals and the addition of simple facilities including small customs and immigration booth/building and security screening equipment and infrastructure.

² The implementation of the common platform, including any hardware and software that may be required could be implemented through additional financing under this Project.

▪ The planned investment in signature attractions for each OECS islands is an essential step in the strengthening of the competitiveness of tourism in the region. These signature attractions will serve as anchor attractions that will have two main effects:

- 1) Increase the attractiveness of OECS islands among existing markets (in particular, cruise passengers and all-inclusives) and generate increased spending within them.
- 2) Trigger the development of more local attractions by local tourism operators that build on or link to the anchor attraction that can ultimately attract new market segments.

▪ The selected pilot tourism products for each country are: (i) the rehabilitation of Fort George, as part of the development of a tourism product around the Carenage area in Grenada; (ii) reinforcement of the marine-based tourism product offering in St. Vincent and the Grenadines, and rehabilitation of Fort Charlotte on the mainland; and (iii) enhancement and beautification of Castries City waterfront in St. Lucia³.

▪ As a first step, this country-specific component will finance a number of technical assistance interventions to support the anchor tourism products, including feasibility studies, technical, engineering, social and environmental assessments, as well as rehabilitation designs; and marketing, business, commercialization and management plans for investments identified.

▪ The second step would include the following works and technical assistance:

(i) **St. Lucia** - The strengthening of a Castries City Tourism product including:

Infrastructure and institutional support for improved urban mobility in Castries through technical assistance, civil works and provision of goods, including

- works in reconstruction of the intersection of Jeremie Street and Compton Highway;
- works to support the organization of pedestrian and taxi movements near La Place Carenage;
- works to support improvements of sidewalks in other key parts of town; works and goods to support replacement of all other traffic lights and improvements of junction; and
- TA for institutional strengthening.

Urban and tourism development, including of sites and attractions in Castries, including for:

- works related to the upgrading the market and surrounding area;
- works and goods for improving visitor experience walking through downtown Castries and Boulevard area (signage, strategically located maps, interactive visitor kiosks with information on events, historic relevance, tours, interpretation facilities, benches, rest areas, cleanliness including additional waste bins and recycling, safety and security upgrades including additional lighting);
- Façade improvement programme;
- Works related to the upgrading of the botanical gardens (landscaping, fence repair, lighting, benches, trash cans);
- TA for the vendors in the market regarding how to showcase goods, alternate

³ For reasons why these sites were selected, please see background paper titled “World Bank OECS Regional Tourism Competitiveness Project: Tourism Site Development and PPP Options”.

goods to consider, etc.

Improving the business environment through:

- Improving the process of starting the business through TA for supporting regulatory changes and IT support for implementing a system of unique identifier;
- Improving the process of obtaining construction permits through TA for creating a single window for construction permits and IT support for implementing a single window;
- Strengthening the protection of minority shareholders through TA for supporting the drafting of legislation;
- Improving the process of registering property through TA for supporting the modernization of the land registry, including associated regulatory reforms, and IT support for implementing a modern property registry;
- Linking the relevant registries: TA to support the linking of the relevant registries, including associated regulatory reforms (e.g. collateral registry, business registry, motor vehicle registry, etc.), and IT support for the linking of the relevant registries; and
- Populating the new registries with data from the previously existing registries through TA to support the transfer the data (including the collateral registry, new property registry, business registry).

(ii) **Grenada** - rehabilitation of *Fort George historic site* (repairs and cleanup of Eastern barracks and adjacent building of the Fort, development of an interactive interpretation center, coffee and gift shops, signage, vending booths, parking lot, washrooms)⁴:

i. Support for infrastructure and works:

Investments and Works
➤ East Barracks building roof
➤ Ground floor stone work and masonry
➤ First floor and internal timber frame of building
➤ Windows, doors (wooden) and furnishings
➤ Displays
➤ Railings
➤ Interpretation center and sound and light production
➤ Gift shop
➤ Coffee shop
➤ General cleanup, de-bushing and repairs to ramparts
➤ Parking and arrival lay by

⁴ It is critical to ensure that the Police Headquarters is moved out of the Fort before the rehabilitation work could start. A government policy to move the Police HQ has already been approved by the Cabinet and a location to move the HQ identified. The government expects to support this move with financing from the Caribbean Development Bank.

➤ Signage and walkways around the entire fort
➤ Creative designer / curator

- ii. TA to craftsmen on selection and display of products that they offer to tourists.

(iii) **St. Vincent and the Grenadines –**

Improve the competitiveness of its flagship Marine-Based Tourism sector through:

- i. Development and implementation of a Marine Tourism Festival;
- ii. Upgrading anchorage site infrastructure: Investments include safety and security, waste collection and management, facilities, equipment, boats and training (for Police, coast guard, rangers and guards), upgrades to walkways, signage, in pilot sites in SVG;
- iii. Technical assistance by supporting preparatory studies for the SVG Marine Training Institute, STWC training⁵.

Limited rehabilitation of Fort Charlotte (roof and general repairs and cleanup of the Fort, development of a cafeteria, car park, buggies, a local craft village setting, and interactive interpretation center) as well as the bridge leading to the Fort:

- support for infrastructure investment and goods:

Investments and Works
➤ Interpretation center
➤ Roof repair
➤ Cafeteria (replica furniture)
➤ 5 vending cells / workshops
➤ General cleanup/repairs to ramparts and outer walls
➤ Car park
➤ Access
➤ Buggies
➤ Creative designer / curator to do the work
➤ Bridge

- TA to craftsmen on selection and display of products that they offer to tourists.

Component 3: Market Development and Promotion Capacity-Building (US\$2,790,000)

⁵ The implementation of this study could be supported through additional financing under this Project.

- This component aims to: (i) At country level, support the refinement and operationalization of tourism plans of OECS countries, for a coherent and sustainable tourism that takes into account new market opportunities and emerging tourism trends and; (ii) At regional level, develop a strong regional market development effort—through regional collaboration and the use of digital channels—to position the countries participating in this Project as one travel destination offering opportunities for distinct experiences across multiple country visits.

Sub-Component 3.1 (country specific): Tourism development plans and their implementation (US\$1,200,000)

- This country-specific sub-component will provide Technical Assistance (TA) and goods to support preparing, refining, and/or deepening sustainable tourism development plans and policies, and their implementation within the Ministries of Tourism and Tourism Authorities in each participating country.
 - The technical assistance would include building capacity at a country level to carry out market segmentation; prepare projections of financial and economic impact; carry out environmental planning and management of the tourism sector; and prepare monitoring and evaluation framework to monitor progress.
 - The provision of goods includes IT support to strengthen the virtual (website, social media presence of each country and what they offer.

Sub-Component 3.2 (regional): Preparation and implementation of a regional tourism market development programme (US\$1,590,000)

2. This regional sub-component will provide TA, operating support and goods to develop and implement a regional market development programme with the underlying goal of attracting new markets:
 1. The technical assistance includes building capacity so the three participating countries could work together to identify new markets as one destination; developing a common approach and marketing strategy as one; negotiating with airlines from a new destination as one; and receiving training and collaborating with the private sector to prepare promotional material for representation in trade fairs.
 2. The operating support includes supporting the borrowing countries in participating in four joint trade fairs as one destination.
 3. The provision of goods includes IT support through the development and implementation of a common digital/social e-tourism communication strategy and IT platform that would drive the participating countries' joint travel marketing.

Component 4: Project Implementation Support (US\$2 million)

3. This country-specific component aims to support the overall implementation of the project. It will provide TA, training and logistical support (as the case may be, office equipment and/or software) to support: (i) capacity-building/staffing of the existing Project Coordination Units (PCUs) on project management, procurement, financial management, safeguards, Monitoring and Evaluation (M&E) and technical expertise in each OECS member country as needed, during the execution of the project; (ii) M&E of project's results, including performance indicators; (iii) consulting services for project audit in each country; (iv) other operating costs that would be defined prior to Appraisal.

2.2 Project financing

1. The total cost of the project is estimated at US\$26 million, supported by the WB through an Investment Project Financing (IPF). The borrowing per country is spelled out in Table 4 below.

2. While the current project will include the three countries indicated above, there is an ongoing dialogue with Antigua and Barbuda, Dominica and St. Kitts and Nevis regarding their participation in a possible second phase of the project. An assessment of their readiness will be carried out at a later stage.

Table 1: Project Cost and Financing (US\$26 million)

Project Components	St. Lucia	Grenada	St. Vincent and the Grenadines	TOTAL
1. Facilitation of the Movement of People	\$720,000	\$830,000	\$1,120,000	\$2,670,000
1.1 TA and goods to support the development of a single regional space for Immigration and Customs entry of international tourists (<i>Country and Regional Levels</i>)	\$300,000	\$410,000	\$700,000	\$1,410,000
1.2 TA, goods, and small infrastructure investments for the development of a pilot regional ferry corridor (<i>Country and Regional Levels</i>)	\$420,000	\$420,000	\$420,000	\$1,260,000
2. Pilot Tourism Investments (<i>Country Level</i>)	\$12,350,000	\$3,740,000	\$2,450,000	\$18,540,000
3. Market Development and Promotion Capacity Building	\$930,000	\$930,000	\$930,000	\$2,790,000
3.1 TA and equipment to support tourism development plans (<i>Country Level</i>)	\$400,000	\$400,000	\$400,000	\$1,200,000

3.2 TA and equipment to support regional marketing programme (<i>Regional Level</i>)	\$530,000	\$530,000	\$530,000	\$1,590,000
4. Project Implementation Support (<i>Country Level</i>)	\$1 million	\$500,000	\$500,000	\$2 million
Total Cost	\$15 million (all IDA)	\$6 million (all IBRD)	\$5 million (all IDA)	\$26 million (\$20 million IDA+ 6 million IBRD)

2.3 Project implementation arrangements

At the national level, the overall responsibility for management and coordination of each project will rest within the countries' existing Project Coordination Units (PCUs) located in the Ministries of Finance (in the case of Grenada and St. Lucia), and the Ministry of Economic Planning in the case of St. Vincent and the Grenadines. All three countries have existing PCUs that have been executing WB financed operations for a number of years.

A high-level Project Steering Committee (PSC) will be set up and chaired by the Ministries hosting the PCU in each participating country for coordination purpose to include decision-makers from line Ministries including Finance, Tourism, Public Works, Immigration and other public sector bodies as needed. The OECS Commission, the private sector (in particular, the Hotel and Tourism Associations from each country) as well as the Caribbean Tourism Organization will serve as advisors to these steering committees. While the PCUs will take input from the PSCs into account, the final decision on all aspects rests with the Ministry hosting the PCUs.

For the purposes of decision-making on the regional components, the PSCs will meet virtually (through webex, video-conference, and telephone conference) as needed but no less than once a month in order to discuss the substance of the regional components. These meetings will be chaired by the Ministry responsible for the procurement of each of the sub-components. After input from the PSCs is received, the final decision on the regional components will be made on a consensus basis by the three Ministries hosting the PSCs. A Social Specialist should be employed to work along with the Project Management Team which should include the Project Coordinator and Officials from the respective Physical Planning Units (see ESMF Report). His/her primary responsibility would include, among other things, screening for land acquisition, developing RAPs, monitoring the implementation of both the RPF and the RAPs, evaluation and ensuring that appropriate actions are taken to address potential resettlement problems.

3. Components for which land acquisition and resettlement are required

The program of US\$26 million will finance physical infrastructure works at identified locations under Components 2, including improvement/ rehabilitation of: (i) Fort George historic site and access in Grenada; (ii) Fort Charlotte site and upgrades to anchorage site infrastructure to enhance competitiveness the Marine-based Tourism sector in St Vincent and the Grenadines; and (iii) Infrastructure for improved urban mobility and tourism development in Castries in St Lucia. In addition, under Component 1.1 the program will finance improvements/refurbishing in the existing passenger ferry terminals and/or jetties in Grenada and St. Vincent and the Grenadines.

The nature and extent of impacts will only become apparent once the final designs have been developed and associated social assessments conducted. In the absence of final designs, a preliminary screening of proposed works has been conducted at all sub-project sites to assess potential social risks and impacts associated with these works. These potential social impacts include: discrete amounts of land acquisition, resettlement, and economic displacement. In the event that any of these issues arise, they are likely to be primarily temporary in nature, and can be readily mitigated using standard measures (e.g. Resettlement Action Plan (RAP), Compensation Plan, Relocation Plan, etc.). Additional social issues that may become relevant include: ensuring adequate access to bathroom facilities in the event that works block access to public bathroom facilities; ensuring adequate safety measures for pedestrian/automobile traffic management during any road works and/or sidewalk improvement; and ensuring accessibility for physically disabled individuals via the installation of ramps and other measures as necessary, at sub-project sites undergoing infrastructure construction and upgrading.

Table 2: Project components for which land acquisition/resettlement are required

Component	Grenada	Saint Lucia	Saint Vincent and the Grenadines
1. Facilitation of the Movement of People	TBD	TBD	TBD
2. Pilot Tourism Investments	TBD	TBD	TBD
3. Market Development and Promotion Capacity-Building	TBD	TBD	No
4. Project Implementation Support	TBD	TBD	No

4. Principles and objectives governing resettlement preparation and implementation

In World Bank assisted projects, borrowers are expected to take necessary measures to mitigate adverse social impacts. The costs associated with mitigation of adverse social impacts on project affected people, such as involuntary resettlement of affected persons or restoration of livelihoods, will be met by the borrower. The general guidelines of this RPF are to be followed by all components under the Loan involving involuntary resettlement. Where involuntary resettlement is identified, resettlement plans (RAPS) will be prepared based on policies and procedures laid out in this framework.

Involuntary resettlement may cause severe long-term hardship, impoverishment, and environmental damage unless appropriate measures are carefully planned and carried out. For these reasons, the overall objectives of the Bank's policy on involuntary resettlement are the following:

(a) Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs.

(b) Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable the persons displaced by the project to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs.

(c) Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

The principle objective of the RPF is to ensure that all Project Affected People (PAP) will be compensated for their losses and provided with rehabilitation measures to assist them to improve, or at least maintain, their pre-project living standards and income earning capacity.

The PAP include the persons to be identified by the baseline information collected whose assets or access to assets are in part or in total affected (permanently or temporarily) by the subprojects.

5. Procedures for screening for land acquisition, preparing and approving Resettlement Plans

The procedure for screening for land acquisition, preparing and approving a resettlement action plan are as follows:

1. PCU Social Development Specialist screens the preliminary selected sub-projects for potential social risks and impacts (including but not limited to land acquisition) and determines social safeguards documents required according to relevant national legislation on resettlement and land acquisition (see Tables 6, 7, and 8) and World Bank Safeguards Policies. The World Bank will review the screening of sub-project sites for safeguards issues.

2. If land acquisition is required then sub-project resettlement plans consistent with this RPF are developed and submitted to the Bank for approval after specific planning information becomes available (see [OP4.12, para.29](#)).

For each component that may involve resettlement, the Bank requires a satisfactory resettlement plan or an abbreviated resettlement plan (ARP) that is consistent with the provision of the policy framework be submitted to the Bank for approval before the component is accepted for Bank financing. When the number of persons affected by the component exceeds 200, a resettlement plan shall be prepared. Where impacts on the entire affected population are minor, or fewer than 200 people are affected, an abbreviated resettlement plan may be agreed with the borrower. Impacts are considered “minor” if the affected people are not physically displaced and less than 10% of their productive assets are lost.

The ARP includes the following elements:

- a census survey of displaced persons and valuation of assets;
- description of compensation and other resettlement assistance to be provided;
- consultations with displaced people about acceptable alternatives;
- institutional responsibility for implementation and procedures for grievance redress;
- arrangements for monitoring and implementation; and
- timetable and budget.

The RP to be submitted thereafter needs not include the policy principles, entitlements and eligibility criteria, organizational arrangements, arrangements for monitoring and evaluation, the framework for participation, and mechanisms for grievance redress set forth in the resettlement policy framework. Please refer to Annex 1 for further guidance and details on screening for land acquisition, as well as on the preparation, implementation and supervision of resettlement. This Annex includes Checklist 1: Assessment of Resettlement Implementation and Outcomes; Checklist 2: Documentation of Land Acquisition and Resettlement Performance throughout the Project Cycle; Checklist 3: Examples of Information to be provided by the Borrower Prior to Resettlement Implementation Support Mission, and; Checklist 4: Overview of Resettlement Instrument Disclosure Requirements during Project Preparation and Implementation.

6. Estimated population displacement and likely categories of displaced persons

Table 3: Likely categories of displaced persons

Grenada	Saint Lucia	Saint Vincent and the Grenadines
Police Dwelling Quarters	Private landowners	Private landowners
TBD	Mobile vendors (downtown Castries)	Private business owners
TBD	Arcade vendors (downtown Castries)	TBD
TBD	Market Vendors (downtown Castries)	TBD

7. Eligibility criteria for defining various categories of displaced persons

Any individual, household or community affected by the Project Activities may very well be eligible for compensation and other resettlement assistance depending on land tenure status and nature of impact. Land tenure/settlements in the Islands within the project area are usually considered to be comprised of the following three categories similar to that of the World Bank: Formal, Semi-formal and Informal. The compensation recommended for each category is presented in Table 4.

Table 4: Eligibility criteria of displaced persons and compensation recommended

Category	Definition	Compensation recommended
Formal	Persons with formal rights to land (including customary and statutory rights of occupancy recognized under the Laws of each respective country)	Compensation for land and assets lost, and other assistance in accordance with the policy.
Semi-formal	Those who do not have formal legal rights to land at the time the census begins but have a claim to such land or assets provided that such claims are recognized under the laws of each respective country or become recognized through a process identified in the resettlement and compensation plan	Compensation for land and assets lost, and other assistance in accordance with the policy
Informal	Those who have no claim to land they are occupying or using	Resettlement assistance in lieu of compensation for the land they occupy or use and compensation for assets lost

Table 5. Comparison of Local compensation laws and World Bank OP4.12

Category of PAPS/Type of Lost Assets	Compensation entitlement in Grenada, St. Vincent and the Grenadines and St. Lucia	World Bank OP 4.12
Formal Settlements / Land owners	Cash compensation, based upon market value. No land –for land- compensation in legislation, but occurs in practice on a case by case basis	Recommends land –for –land compensation. Other compensation is at replacement cost.
Semi- Formal Land Tenants Land users	Entitled to compensation based upon the amount of rights they hold upon land under relevant laws. Land users are provided with secure tenure under the land tenure law if the persons are using the land for personal income, and ownership is evident and permanent. Where a person uses land for twelve (12) consecutive years without a dispute entitles him the right equivalent to ownership. In other cases land users not entitled to compensation for land, entitled to compensation for crops and any other economic assets	Are entitled to some form of compensation whatever the legal recognition of their occupancy Entitled to compensation for crops, may be entitled to replacement land and income must be restored to pre-project levels
Informal settlements Owners of Squatters “Non permanent” Buildings	Cash compensation based on market value or entitled to new housing on authorized land under government (State or local) housing programs	Entitled to in-kind compensation or cash compensation at full replacement cost including labour and relocating expenses, prior to displacement
Owners of “permanent” buildings	Cash compensation is set by the tribunal, based on the total market value of the building. In some cases, other conventional compensations are allowed.	Entitled to in-kind compensation or cash compensation at full replacement cost including labour and relocation expenses, prior to displacement
Perennial crops	Cash compensation based upon market rates calculated as an average net agricultural income.	Entitled to in-kind compensation or cash compensation at full replacement cost including labour and relocating expenses, prior to displacement

8. Legal framework: fit between borrower laws and World Bank policy requirements, and measures proposed to bridge gaps

8.1 Relevant Legislation

There are several pieces of legislation in each of the three islands that have some relationship to Resettlement. However, the most relevant are the Land Acquisition Acts, The Land Settlement Act, Compensation and the Acts dealing with Land Development. The latter also includes provision for addressing most resettlement issues covered under the various other legislations. They are catered for in its wide ranging definition of Development being any activity in, on, over or under the land. Details of the most relevant pieces of legislation and their relationships to resettlement are presented in the following Tables.

Table 6: Grenada's Relevant Resettlement Legislation

Relevant legislations	Functional Relationship to Resettlement
The Land Acquisition Act of 1945 and the Land Acquisition (Amendment) Act 16 of 1991	Provides for the acquisition of land for public benefit. The government has the powers under this Act to acquire land for projects, which are intended to benefit the general public. The sub-projects requiring resettlement are under the provision of this Act.
The Land Settlement Act (CAP 161) of 1933	Provides for the absolute proprietorship over land (exclusive rights). Such land can be acquired by the State under the Land Acquisition Act
Compensation (land, rates of labour, buildings and structures, Sacred Sites, Horticultural, Floricultural and Fruit trees, crops)	A person interested in any land which, without any portion thereof being compulsorily acquired, has been injuriously affected by the erection or construction on land compulsorily acquired of any works in respect of which the land was acquired, shall be entitled to compensation in respect of such injurious affection.
The Physical Planning and Development Control Act, No 25, of 2002	The Act requires that all lands intended for any development (resettlement or other) must first obtain planning and development approval.

Table 7: Laws of St. Vincent and the Grenadines governing resettlement

Legal Framework	Functional Relationship to Resettlement
The Land Acquisition Act and Chapter 322 Laws of St. Vincent and the Grenadines	Provides for the acquisition of land for public benefit. The government has the powers under this Act to acquire land for projects, which are intended to benefit the general public. The sub-projects requiring resettlement are under the provision of this Act.
The Land Settlement and Development Act Chapter 242 Laws of St. Vincent and the Grenadines	Provides for the absolute proprietorship over land (exclusive rights). Such land can be acquired by the State under the Land Acquisition Act in the project area.
The Land Adjudication Act Chapter Laws of St. Vincent and the Grenadines	Provides for the ascertainment of interests prior to land registrations under the Land Settlement and Development Act.

Compensation (land , rates of labour, buildings and structures, Sacred Sites, Horticultural, Floricultural and Fruit trees, crops,	A person interested in any land which, without any portion thereof being compulsorily acquired, has been injuriously affected by the erection or construction on land compulsorily acquired of any works in respect of which the land was acquired, shall be entitled to compensation in respect of such injurious affection.
The Traffic Act Chapter Laws of St. Vincent and the Grenadines	The Act prohibits encroachment on and damage to roads including land reserved for roads by any project or any human settlement or by an exercise of resettlement. The project is under the provision of the Act.
The Public Health Act Chapter 232 Laws of St. Vincent and the Grenadines	Provides for the securing of public health and recognizes the importance of water. It provides for prevention of water pollution by any development activity including resettlement by stakeholders.
The Town Planning Act 1992,	The Act requires that all land intended for any development requires planning and development permission
The Town and Country Planning Regulations 2000	Regulations made pursuant to the Town and Country Planning Act, 1992
Motor Vehicle and Road Traffic, Cap 355	The Act also prohibits encroachment on and damage to roads including land reserved for roads by any project or any human settlement or by an exercise of resettlement. The project is under the provision of the ACT.

Table 8: St. Lucia’s Relevant Resettlement Legislation

Relevant legislations	Functional Relationship to Resettlement
Land Acquisition Act established in 1946	Provides for the acquisition of land for public benefit. The government has the powers under this Act to acquire land for projects, which are intended to benefit the general public. The sub-projects requiring resettlement are under the provision of this Act.
Compensation (land , rates of labour, buildings and structures, Sacred Sites, Horticultural, Floricultural and Fruit trees, crops,	A person interested in any land which, without any portion thereof being compulsorily acquired, has been injuriously affected by the erection or construction on land compulsorily acquired of any works in respect of which the land was acquired, shall be entitled to compensation in respect of such injurious affection.
The Physical Planning and Development Act(revised December 31 2005)	The Act states that all land intended for any development (resettlement or other) requires planning and development permission.

8.2 Fit between the World Bank and Borrowers Laws

8.2.1 Grenada

In the case of Grenada compliance with OP 4.12 has been met. Grenada constitution order 1973 states that all compensation for compulsory land or other asset acquisition originates and derives from Grenada’s constitutional order. Compensation is established as a fundamental right of every citizen whose property is

compulsorily acquired by the state for public purposes. The constitution states that every person, regardless of race, place of origin, political opinion, colour, creed or sex is entitled to:

“Protection for the privacy of his home and other property and from deprivation of property without compensation” (Chapter 1, No. 1 (c) and for “...prompt payment of full compensation” (No. 6 (1), see Annex 3 for more details) and further states that; “Every person having an interest in or right over property which is compulsorily taken possession of or whose interest in or right over any property is compulsorily acquired shall have a right of direct access to the High Court for-

- a. the determination of his interest or right, the legality of the taking of possession or acquisition of the property, interest or right and the amount of any compensation to which he is entitled and
- b. the purpose of obtaining prompt payment of that compensation” :

In general terms **the provisions of the constitution are consistent with and typical of that enunciated by the World Bank’s policy on resettlement, especially where the bank’s policy calls for prompt compensation and recourse to redress where a dispute arises thereto.** More specifically, provisions are outlined in the Land Acquisition Act 1945 and Land Acquisition (Amendment) Act of 1991) “Compensation” means prompt and full compensation as provided for, by and under the constitution and “Land” includes freehold, leasehold and mortgage interest (Amendment Act of 1991) “And the Crown in accordance with the relevant provisions of the constitution and of this Act make prompt payment of such full compensation as may be due”

Authorized officer to treat with landowner

- (1) As soon as a declaration has been published in accordance with the provisions of section 3 (that is, acquisition of any land by the Governor General for public purpose, and a declaration published accordingly), the authorized officer shall, without delay, enter into negotiations (or further negotiations) for the purchase of the land to which the declaration relates upon the reasonable terms and conditions, and by voluntary agreement with the owner of the land.
- (2) Every notice of acquisition under this section shall –
 - (c) Require all persons interested, as soon as is reasonably practicable, either –
 - (i) to appear personally or by attorney or agent before the authorized officer to state the nature of their respective interests in the land and the amounts and full particulars of their claims to compensation in respect of those interests, distinguishing the amounts under separate heads and showing how the amount claimed under each head is calculated; or
 - (ii) to render to the authorized officer a statement in writing, signed by them or by their attorneys or agents, setting forth the like matters.

World Bank Procedures for Resettlement/ Rehabilitation (OP 4.12)

The World Bank operational directive OP 4.12 states: “Where the specific resettlement needs of each subproject are not known in advance, the borrower would need to agree to resettlement policies, planning principles, institutional arrangements and design criteria that meet Bank policy and requirements as a condition of the loan. An estimate should be provided of total population to be displaced and overall resettlement costs, as well as an evaluation of proposed resettlement sites. Subprojects in sector investment loans should be screened by the implementing agency to ensure consistency with this directive, and approved individually by the Bank”.

The commitment of the MOF/PCU with respect to the **OECS Regional Competitiveness Tourism Project** to comply with the requirements of World Bank's operational directives is clear and incorporated in the credit agreement. Furthermore, the MOF/PCU will ensure, in the credit agreement, its commitment to addressing the adverse social impacts of project operations. It has expressed such commitment by its participation in some of the preliminary consultations already undertaken by the World Bank.

8.2.2 Saint Vincent and the Grenadines

In general, OP 4.12 is consistent with the laws of St. Vincent and the Grenadines. The table below provides a comparison between the OP 4.12 and the relevant laws of St. Vincent and the Grenadines as it relates to the treatment of different categories of PAPs and assets affected by the project.

Category of PAPs	Laws of St. Vincent and the Grenadines	OP 4.12
Formal Settlements/Land Owners	Cash compensation based upon market value. There is no land-for-land compensation in legislation but occurs in practice on a case by case basis.	Recommends land-for-land compensation. Other compensation is at replacement cost.
Semi-Formal Land Tenants Land Users	Entitled to compensation based upon the amount of rights they hold under the relevant laws. Land users are provided with secure tenure under the land tenure law if the persons are using the land for personal income, and ownership is evident and permanent. Use of land for 12 consecutive years without a dispute entitles him the right equivalent to ownership. In other cases where the land users are not entitled to compensation for land, they are entitled to compensation for crops and any other economic assets.	Are entitled to some form of compensation whatever the legal recognition of their occupancy. Entitled to compensation for crops, may be entitles to replacement land and income must be restored to pre-project levels at least.
Informal Settlements	Cash compensation based on market value or entitled to new housing on authorized land under government (national or local) housing programmes.	Entitled to in-kind compensation or cash compensation at full replacement cost including labour and relocating expenses, prior to displacement.
Owners of “permanent” buildings	Cash compensation is set by the tribunal based on the total market value of the building. In some cases, other conventional compensations are allowed.	Entitled to in-kind compensation or cash compensation at full replacement cost including labour and relocation expenses, prior to displacement.

Perennial crops	Cash compensation based upon market rates calculated as an average net agricultural income.	
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8.2.3. Saint Lucia

The national legal frame work provides the Government of Saint Lucia with instruments that entitle bearers of assets with rights of notification and fair compensation, which are compatible with the Bank’s involuntary resettlement policy. A court case precedent as well as interviews with different persons involved in the process (in the context of the Saint Lucia Disaster Management Project II), also offer some evidence to the fact that the customary application of this legal framework has usually favored land owners (in terms of negotiated compensation) vis-à-vis the State. Nevertheless, the laws of Saint Lucia vary from that of OP 4.12 for two reasons.

First, the chronology of events permitted under the Land Acquisition Act does not correspond with the timing of activities accepted by the Bank. According to World Bank policy, the land owners/occupants must be compensated **before** the works take place, while the Land Acquisition Act of Saint Lucia allows this payment to take place after the completion of the works. It is therefore fundamentally important that this order be reversed in order to proceed. *Hence, affected landowners must be compensated before any works can commence.*

Second, a project’s reliance on the State’s authority and ability to acquire land as long as it is in accordance with the Land Acquisition Ordinance has apparently resulted in the responsible parties neglecting to engage with the affected land owners as legitimate stakeholders through a transparent communication strategy. Therefore, compliance with Bank policy will depend on (i) the Government’s commitment to a transparent communication strategy based on the information and validation processes set out in Section 4 and including a clear grievance mechanism for the affected persons to voice their concerns.

Squatters (persons who have no recognizable legal right or claim to the land they are occupying) are considered displaced persons and therefore are provided compensation for loss of assets other than land (see OP 4.12 paras. 14 - 16).

In addition, Bank policy requires that, displaced persons and their communities, and any host communities receiving them, are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementing, and monitoring resettlement. Appropriate and accessible grievance mechanisms are established for these groups (see OP 4.12 para. 13).

The GoSL shall establish and implement public information campaigns and consultations. The specific objectives of the campaigns and consultations would be to:

- (a) fully share information about the proposed project, its components and its activities;
- (b) solicit the community’s inputs in the resettlement process;
- (c) ensure transparency in all activities related to the relocation of the squatters.

The following mechanisms shall be employed:

- (d) Community or town hall meetings to disseminate information on resettlement plans and receive

feedback (ideas, concerns, and alternative suggestions) from affected persons on resettlement alternatives.

(e) Meetings with affected households to disseminate information on resettlement plans and receive feedback (ideas, concerns, and alternative suggestions) from affected persons on resettlement alternatives. This will provide an opportunity to assess women headed households and their particular concerns. Gender issues may occur in the titling of property to women and their access to resources.

(f) Public information campaigns to sensitize the members of the communities where the various sub-projects will be implemented.

(g) Meetings with the Parliamentary Representatives, representatives of Village and Town Councils, Development Committees/Rural Councils, Youth and Sports Groups, Faith-Based Organizations, and the Private Sector, and in the various sub-project areas.

(h) Key Informant Interviews and Focus Groups.

(i) Stakeholder participation in Committees established during the planning and implementation of the sub-project.

9. Methods of valuing affected assets

The above mentioned Land Acquisition Acts in each of the recipient islands describe the methods of valuating lands acquired for public use. The process begins with the Governor General appointing the relevant authorized officer (the head of the Land Surveying Department or a competent officer who is involved in Land Valuation or other) to prepare the relevant instruments and guidance necessary for the state to acquire the specified property in accordance with the provisions of the Acts.

The authorized officer then conducts a formal valuation of the property based on current market value. In the case of loss of assets, the replacement cost is usually applied and where the property is leased from the state, the physical investment, plus the expected income streams up to the end of the life of the lease is valued. Provisions are also made for engagement of affected persons, transparency and appeals.

Despite the occurrence of minor issues in some instances, this method has been working well. Therefore there is no reason why it should not be used for the Project. The first step after the sub-project sites are identified, should be a review of the provisions in the Acts to determine their relevance to the specific situation. They should be compared with OP 4.12 and wherever necessary the appropriate guidelines should be applied.

The intention is to ensure that affected persons do not end up in a worse-off position than they were before the Project intervention. In which case, all the impact related elements should be valued and compensated for. In the case of an agricultural investment, crop farming for example, apart from the replacement cost (labor, planting materials etc.) a determination should be made on the potential losses during the period of transition. The agricultural department should be consulted for assistance with this issue.

The replacement cost that can be applied for agricultural land is the pre-project or pre-displacement (whichever is higher) market value of land of equal productive potential or use located in the vicinity of the affected land, plus the cost of land preparation to levels similar to those of the affected land, any registration and transfer taxes.

For land in urban areas, it is the pre-displacement market value of land of equal size and use, with similar or improved public infrastructure facilities and services and located in the vicinity of the affected land, plus the cost of any registration and transfer taxes.

10. Institutional Roles and Responsibilities

The PCU will ensure that all project activities adhere to the requirements of the RPF, and the PCU Social Development Specialist oversees the implementation and monitoring of the framework. The World Bank Task Team will include a Social Specialist to provide periodic supervision of the RPF and to approve resettlement/studies/plans requiring clearance by the World Bank.

Prior to the submission of works activities for funding consideration under the OECS Regional Tourism Competitiveness Project, the PCU shall screen the sub-projects to assess whether or not land acquisition is entailed, along with any other social risks and impacts. In the event that a Resettlement Action Plan is required, the Social Development Specialist within the PCU will be responsible for the development and implementation of any RAPs, with technical inputs from relevant Government Ministries as needed.

The agencies and departments of Government responsible for the various aspects of executing these activities are as follows:

10.1 Saint Lucia:

- The Survey and Mapping Section, MOPD for acquiring the lands and, as such, is responsible for the following:
 - Seeking Cabinet's approval of notice of intention
 - Survey of lands and publication of the notification of intent to acquire the lands
 - Publication of the intention to acquire in the Gazette
 - Valuation of the lands to be acquired by the Chief Surveyor / Authorised Officer
- The Accounts Section of the MOPD for payment to affected persons – Permanent Acquisition
- The Crown Lands Section, MOPD for the land arrangements
- The Executing Implementing Agency for payment of affected persons – Temporary Acquisition
- The Cabinet of Ministers is responsible for the approval of acquisition and the related payment
- The Ministry of Finance is responsible for providing funding for the payment of compensation

10.2 Saint Vincent and the Grenadines:

- The Office of the Chief Surveyor, by law, shall manage the land acquisition and relocation issues including determining ownership of property, negotiating with land owners and earmarking lands for relocation where necessary.

- The Office of the Chief Engineer within the Ministry of Transport and Works is the Government's authority on civil works. All civil works activities will be supervised by this office under the direction of the Chief Engineer.
- The Ministry of Agriculture will undertake the valuation of crops where necessary.
- The Physical Planning Unit;
- The Statistical Office will provide the socio-economic information on the affected communities

10.3 Grenada:

- The Department of Lands in the Ministry of Agriculture is responsible for the following:
 - Obtains Cabinet's approval of the intention for acquiring lands.
 - Survey and value lands and publication of notification of intent to acquire lands.
 - Publication of the intent to acquire lands in the Gazette.
- The Cabinet of Ministers is responsible for the approval of land acquisition and the related payment.
- The Ministry of Finance is responsible for providing funding for the payment of compensation and resettlements.

11. Implementation process, linking resettlement implementation to civil works

- Establishment of boundaries of all project activity.
- Establishment of the cutoff date and carrying out of the census to identify PAPs.
- Census will generate information about the PAPs, their entitlements regarding compensation, resettlement and rehabilitation assistance as required.
- Unforeseen changes in scope that may result in further compensation, especially those affecting income-earning activities, shall be properly recorded for the sake of compensation as asset replacement.
- Based on the census and inventory of losses, and in consultation with the PAPs, a time phased action plan with a budget for provision of compensation, resettlement, and other assistance as required, shall be prepared.

In case of involuntary resettlement, approval of the new pieces of land to be used for resettlement shall be sought from the Government in consultation with local communities and affected individuals.

To ensure transparency of procedures, PAPs shall be informed of method of valuation used to assess their assets. All payments of compensation, resettlement assistance and rehabilitation assistance, as the case may be, shall be made in the presence of PAPs in question and the local community leaders or church leaders.

11.1 Timeframes

The following key timeframes shall apply unless otherwise agreed between the executing agency and the PSC and the PAPs; provided however, that no agreement to waive the timeframes shall adversely affect the rights or interests of PAPs, under the Framework:

- The inventory shall be completed at most two months prior to the commencement of work;
- Civil works shall commence after compensation, resettlement and rehabilitation activities have been concluded;

Compensation payments for acquired land and affected assets and resettlement of households, must be completed as a condition for land acquisition and before commencement of the civil works under the project.

11.2 Linking resettlement implementation to Civil works

For the activities involving land acquisition or loss, denial or restriction to access of resources, it is required that provisions be made, for compensation and for other assistance required for relocation prior to displacement. The assistance includes provision and preparation of resettlements sites with adequate facilities.

An implementation schedule should be designed by the project steering committee in conjunction with the PCU Social Specialist, and it must include:

- Target dates for commencement and completion of civil works,
- Timetables for transfers of completed civil works to PAPs,
- Dates of possession of land that PAPs occupy (this date must be after transfer date for completed civil works to PAPS and for payments of all compensation).

When approving recommendations for resettlements, PAPs must confirm that the resettlements plans contain acceptable measures that link resettlement activity to civil, works, in compliance with this document. Strategic timing and coordination of civil works shall ensure that no affected persons will be displaced (economically or physically) due to civil works activity, before compensation is paid and before any project activity can begin.

12. Description of grievance redress mechanisms (GRMs)

12.1 Grenada

PAPs will have opportunities to present complaints and grievances through the resettlement process as set out in the Land Acquisition Act (see paragraph 14, 17 [3] and 18 [3 and 4] of Section III above. It sets out the grievance redress process and who is responsible at various stages). The mechanisms for redressing the grievances of the affected populations will begin through consultation (i.e., meetings / consultation with any and all PAP to provide information and gauge expectations of compensation, interest in form or type of compensation, provide clarification on other forms of assistance...). Beyond the consultative process, the process by which grievances will be redressed, for each project site where PAP's are identified will be

in accordance with the Land Acquisition Act as indicated above. The Act also provides for representatives of PAP's on the Board presiding over the grievance.

Table 9: Institutional Responsibility for Implementation

Implementation Stages	Agency	Responsibility
Project Preparation	PCU/ Social Development Specialist	Facilitate and support all relevant project RAP actions.
	PCU/ Social Development Specialist	<ol style="list-style-type: none"> 1. Identify the affected persons consult and advise them on their rights as per OP/BP 4.12 2. Follow up on all site issues and matters related to any complaint which may arise during the implementation process. 3. Manage, monitor, and document in a GRM database the entire grievance redress process. 4. Secure the necessary resettlement assistance required – not required in this sub project.
Project Implementation	PCU/Social Development Specialist and Project Engineer	Overall monitoring
	PCU/ Social Development Specialist	<ol style="list-style-type: none"> 1. Assess and process PAP complaint(s) 2. Manage, monitor, and document the grievance redress process in a GRM database
	High Court of Grenada Lands Department (MOC DH)	Receive, assess and process and decide on /grievances complains related to sub project.

Should grievance remain unresolved beyond the Board review process, the Land Acquisition Act outlines the process for referral to a civil court to settle the grievance since the Act indicates that persons affected by land acquisition has the right to take their matter to the court when other grievance redress measures have failed (such as in cases where PAPs may refuse the compensation offered)

12.1.1 Procedures for Grievance Redress

Grievances are issues, concerns, problems, or claims (be it perceived or actual) that an individual or a community group wants a project promoter/owner to address or resolve.

The PCU Social Development Specialist's contact information (telephone, email address, PCU website, PCU address) must be included in signage at all sub-project sites.

The grievance process to follow if a PAP feels aggrieved is as follow.

- Step (i).** Verbally express grievance to the Social Development Specialist (SDS) who is located in the Project Coordination Unit (PCU) office at the Grenada Cocoa and Nutmeg Association (GCNA) Karani James Boulevard, St. George's.
- Step (ii).** Fill out and hand in the **Grievance Form** (see annex 2) which can be collected from the Social Development Specialist; or **call 443-0531/2 to express complain verbally which will be written down by the SDS; or e-mail to:pcu@gail.com; or mail in to PCU office at the Grenada Cocoa and Nutmeg Association (GCNA) Karani James Boulevard, St. George's.**
- Step (iii).** Social Development Specialist will submit form to head of Grievance Appeal Committee **no later than two (2) days after receiving complain(s) from PAPs**
- Step (iv).** The Head of the Grievance Appeal Committee **will convene a meeting no later than one (1) week after receiving complain** with the other members of the committee.
- Step (v).** A decision will be reached which will be final and filed in the Court or further research into the situation recommended by the head of the Grievance Appeal Committee. In such a case another meeting of the Grievance Appeal Committee will be convened appropriately and decisions taken.

The Committee will be chaired by the head of the PCU and therefore, the PCU will provide all the necessary support to enable the committee to assume its role including clerical work and budget support. The committee must be based in a location that lends for easy access to PAPs and other people who may raise any claims or complains during the implementation of the project. **The Grievance Appeal Committee is located at the Nutmeg Complex on the Karani James Boulevard. This will ensure that the PAPs with their grievances are not placed in a disadvantage position when their issues are discussed. This building is known for its publicness or easy access to the general public. These claims and complains will be received and processed to the Committee for thorough assessment and further required actions within one week of receiving them. The maximum time to solve a grievance or complaint is three (3) months.**

12.1.2 Grievance Appeal Committee Role

- (i) The Committee through the Social Development Specialist will receive and register all appeals and complaints by consulting with the complainant. The Committee will response to all complains with a rational justification describing the process with which the complaint was considered and explaining the reason for the decision reached by the Committee.
- (ii) The Appeal Committee is the final forum for decisions on any claim for compensation of any sort.
- (iii) The Appeal Committee will meet as required to review complains which have been received.
- (iv) The committee may make call on witnesses, a facilitator or expert to provide additional information, testimony or opinion. These individuals act in an advisory capacity only and their input advice or opinion will not be binding on the Committee.

- (v) The Committee will consider each complaint on a case by case basis to determine whether the case constitutes a valid complaint, if a complaint is valid the Committee is required to find fair and just solution to the claim.
- (vi) The Grievance Appeal Committee comprise the following persons:-
 - (a) The head of the Project Coordinating Unit Ministry of Finance
 - (b) The head of the Physical Planning Unit Ministry Of Works
 - (c) The head of Lands department Ministry of Community Development
 - (d) The Controller of Inland Revenue Department Ministry of Finance and
 - (e) The Social Development Specialist (OECS Tourism Competitiveness Project)
 - (vii) All Committee deliberations and decisions must be properly documented and preserved for records.

12.2 Saint Lucia

The Grievance Redress Mechanism will be developed and implemented by the PCU Social Development Specialist and will include:

- (i) A recording and reporting system, including grievances filed both verbally and in writing;
- (ii) The PCU Social Development Specialist’s contact information (telephone, email address, PCU website, PCU address) must be included on signage at all sub-project sites.
- (iii) Designated staff with responsibility at various levels of governments, and;
- (iii) A timeframe to address the filed grievances.

This mechanism will be detailed in the sub-project safeguards documents. The functioning of the grievance redress mechanism will be regularly monitored and evaluated by the PCU during project implementation. See Annex 2 for Form for Registration of Grievances.

12.3 Saint Vincent and the Grenadines

The Grievance Redress Mechanism (GRM) effectively addresses grievances from the people impacted by the World Bank projects. It can be an effective tool for early identification, assessment and resolution of complaints on projects.

12.3.1 The Foundation of an Effective Grievance Procedure

The GRM is an integral part of the development process for the GOSVG. In the country’s National Economic and Social Development Plan 2013-2025 Goal 3, outcome 3.3 under the promoting good governance, provision is made for public awareness about their legal rights and avenues for redress.

The grievance procedure is intended to provide residents with opportunities to voice complaints or concerns about the project activity.

12.3.2 Structure of Grievance Redress

- I. Public grievances are received by the Attorney General Office on behalf of the GOSVG.
- II. During the life cycle of the project, all grievances pertaining to the OECS Regional Competitiveness Project would be received by the Social Specialist. The Social Specialist identifies the problem area, then in collaboration with the PSC, guided by the Attorney General, evaluates and resolves the claims.
- III. The PSIPMU will continuously monitor all possible expropriation/ reports and discuss outcomes in the Project Steering Committee (PSC) meetings.

12.3.3 Guidelines for processing grievance

- 1) After the final demarcation of the project sites, a sign post would be erected to notify the public about the pre project development. Notification should be given on radio via the public service information about the project development. At the project site on the sign post a rectangular portion would be allocated with information as to where to direct all grievances. The rectangular portion would state: -

12.3.4 Notification to the Public

All grievances relating to the development of this project are to be directed to:

Project Coordinator,
Project Steering Committee
Regional Disaster Vulnerability Development Project
Ministry of Economic Planning, Sustainable Development,
Industry, Information and Labour
Administrative Building
Kingstown
Telephone: 784-457-1746
email: cenplan@svgcpd.com

- 2) The affected persons should file his/her grievance in writing, to the PSC. The grievance note should be signed and dated by the aggrieved person.
- 3) The PSC should acknowledge within five (5) business days, the receipt of the documentation. The nature of the grievance would be directly addressed by the Social Specialist along with the other relevant concerned Ministry (e.g. Chief Surveyor – Land Acquisition issues). The relevant personnel would ascertain the period (not exceeding thirty (30) business days) necessary for the PSC to address the grievance and notification must be given to the aggrieved person.

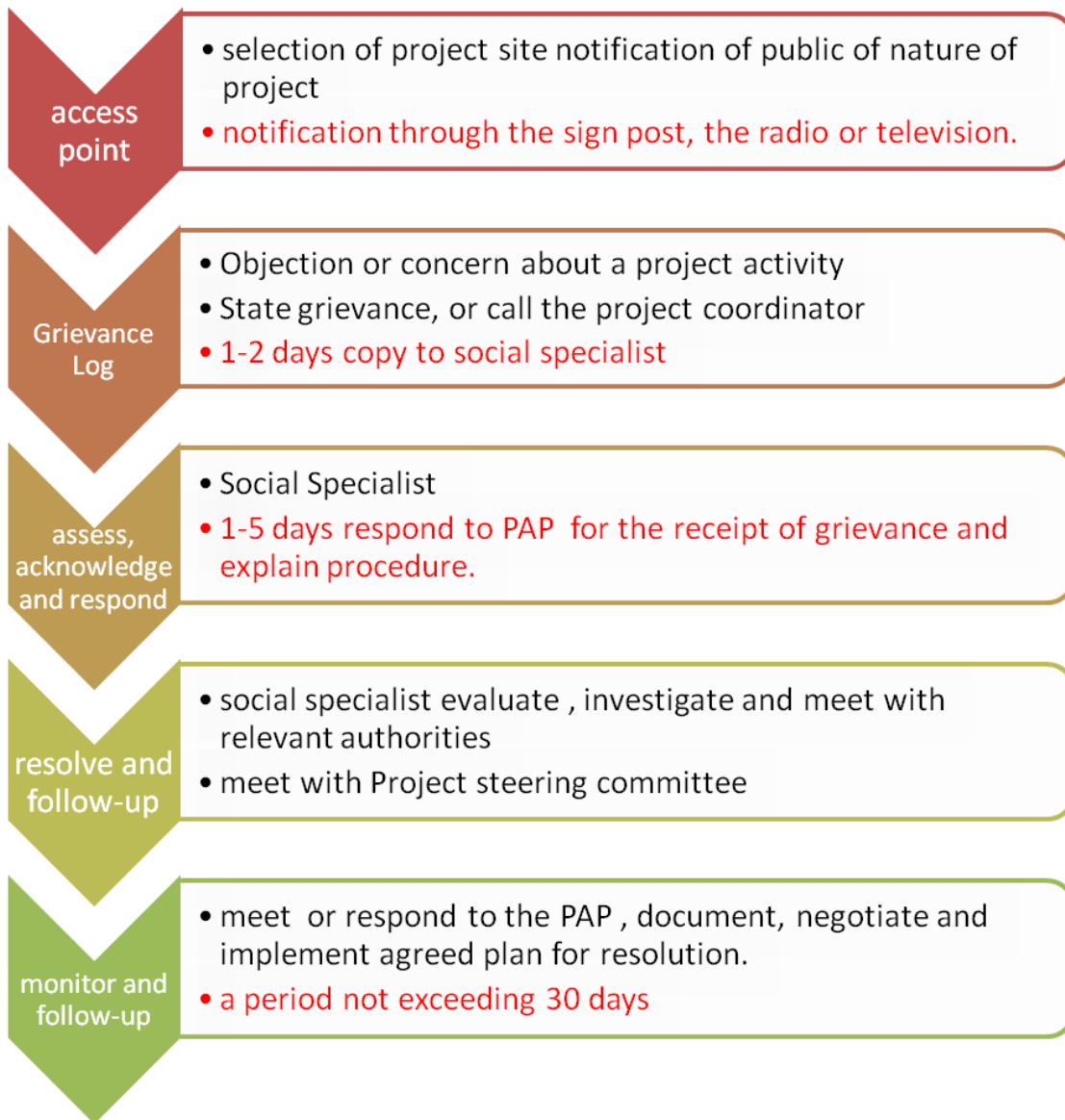
- 4) If the aggrieved person does not receive a response or is not satisfied with the outcome within the agreed time he/she can lodge his/her grievance to the Director of Public Prosecution.
- 5) No grievance is to be rejected without having been independently examined, issued a reason and a reply.
- 6) Complainants must be informed of the name, designation, office, and telephone number of the official who is processing the case. The time frame in which a final reply will be sent should also be indicated.
- 7) All grievances concerning non-fulfilment of contracts, levels of compensation, or seizure of assets without compensation shall be made in writing, and addressed to the PSC. Copies of the complaint shall be sent to the Director of Planning, Ministry of Economic Planning, Sustainable Development, Industry, Information and Labour, within 20 business days following communication to the PSC.
- 8) If an agreement cannot be reached the aggrieved party or parties shall raise their concerns to the PSC who shall refer them to the Director of Planning, within twenty (20) business days. Grievances that cannot be resolved with the Project Steering Committee shall be submitted to the Director of Public Prosecution and to the executing agencies. Should grievances remain unresolved at this level, they can be referred to the Court of Law.

12.3.5 The procedure for handling grievances

The procedure should be as follows:

- All grievance representations received under the project, either by mail, fax, e-mail, are to be invariably routed to the Social Specialist for processing. A copy the complaint should be given to the aggrieved indicating receipt of Grievance.
- Grievance received by word of mouth should be recorded, re-read to the aggrieved person and signed by the aggrieved person in the presence of a witness and forwarded to the Social Specialist.
- The Social Specialist shall meet with the Project Steering Committee to discuss the gravity of the matter and decide whether it shall be dealt with immediately or should be forwarded directly to the Attorney General's Office for independent attention.
- The Social Specialist should monitor and follow up all grievances to enable timely attention.

12.3.6 Grievance diagram



12.3.7 Review and monitoring of Grievance Redress Mechanism

Ensure meaningful review of the performance of grievance redress process of the project. The project coordinator should ensure that all grievances are addressed within one month.

12.3.8 Best practice

- The better method to redress a grievance is not to allow the grievance to arise in the first instance.

- When project sites have been identified a consultation and information session will be scheduled with residents to discuss the nature of the project and to note and address any concerns on the project development.
- Identify areas susceptible to grievance generation and identify possible opportunity or alternatives. Recommendations should be made and discussed with PSC, if the grievance cannot be avoided, then compensation or alternate options should be communicated to the potential aggrieved individual.
- On the determination of the project site, screening should be conducted for boundaries, agriculture produce, and other assets subject to be affected by the project. When identified, discussion should be undertaken with the project steering committee to minimize grievance.
- Deal with every grievance in a fair, objective and just manner.
- Develop and issue booklets/pamphlets about the schemes/services available to the public indicating the procedure and manner in which the grievances can be availed and the right authority to be contacted for service for example the Project Coordinator, the Ministry of Agriculture for crops and the Lands and Surveys Department for land issues.

13. Description of the arrangements for funding resettlement, including the preparation and review of cost estimates, the flow of funds, and contingency arrangements

13.1 Grenada

There is no special provision or funds set aside for funding resettlements and land acquisition. Arrangements for funding will be determined on a case by case basis by the Ministry of Finance (MOF), through the Annual Estimates of Revenue and Expenditures. The cost will be determined, in the case of lands by the Department of lands and in the case of buildings the Ministry of Works is responsible for carrying out structural assessments and preparing cost estimates. Once the amount is determined, a request for provision is made to the Ministry of Finance for inclusion in the Annual Estimates of Revenue and Expenditures which will be appropriated by the relevant expenditure warrant.

13.2 Saint Lucia

The cost of land acquisition and associated administrative and logistical costs will be provided for by the Ministry of Physical Development in its Budget since Land Acquisition forms part of the Planning Programme of the Ministry. The exact costs will be determined according to the Land Acquisition Act, and payments must be made *before* the works begin.

While temporary acquisition is not covered under the Land Acquisition Act of Saint Lucia, it is covered by WB OP4.12 and, as such, the compensation to the aggrieved party will have to be done in accordance with this policy. Therefore, any unauthorised access / trespassing and rental of property would be paid for by the Executing Implementing Agency. For temporary acquisition, the Executing Implementing Agency is

expected to conduct negotiations with assistance from the Physical Development Officer, the Community Development Officer and the PCU.

13.3 Saint Vincent and the Grenadines

13.3.1 Arrangement for funding

Immediately following the publication of a declaration in accordance with the provisions of section 3 of The Land Acquisition Act and Chapter 322 of the Laws of St. Vincent and the Grenadines, an authorised officer, (for the purpose of the OECS Regional Tourism Competitiveness Project) - the Social Specialist - with the guidance of the Chief Surveyor shall, enter into negotiation (or further negotiations) for the purchase of the land to which the declaration relates, by voluntary agreement with the owner.

It shall not be necessary for the authorised officer (Social Specialist with the guidance of the Chief Surveyor) to await the publication to enter into negotiation to ascertain from the owner the terms and conditions on which he is willing to sell his land; the negotiations are completed on the approval of the Governor General (as it regards the OECS Regional Tourism Competitiveness Project – Project Steering Committee (PSC)) of the conditions of sales and acquisition.

All questions and claims relating to the payment of compensation under Chapter 322 of the Land Acquisition Act shall be submitted to the Board of Assessment, as it regards the OECS Regional Tourism Competitiveness Project, all questions shall be forwarded directly to the Project Steering Committee:

Project Coordinator,
Project Steering Committee
Regional Disaster Vulnerability Reduction Project
Ministry of Economic Planning, Sustainable Development,
Industry, Information and Labour
Administrative Building
Kingstown
or Telephone: 784-457-1746

All appeals shall lie against a decision of the PSC to the Director of Planning or the Attorney General.

13.3.2 Source of funding

This relates to expropriation and compensation costs for loss of properties for resettlement under the OECS Regional Tourism Competitiveness Project. All amounts which have been awarded by way of compensation under the OECS Regional Tourism Competitiveness Project, including interest and costs to be facilitated by the Social Specialist, and all other costs, charges and expenses which shall be incurred under the OECS Regional Tourism Competitiveness Project Land Acquisition issues shall be paid out of the Consolidated Fund. IDA cannot be used to finance cash payments in resettlement cases nor the purchase of land.

14. Description of mechanisms for consultations with, and participation of, displaced persons in planning, implementation, and monitoring

14.1 Notification Procedure

The resettlement and compensation, like other components of the project, will be implemented through a participation and consultation process. In order to facilitate this the Project shall by public notice, and publicly announced in the media (Daily newspapers, National Television, National Broadcasting Radios), notify the public of its intention to acquire land earmarked for the project.

The notice shall state:

- a) government's proposal to acquire the land;
- b) the public purpose for which the land is needed;
- c) that the proposal or plan may be inspected during working hours;
- d) that any person affected may, by written notice, object to the transaction giving reasons for doing so, to the Project Management Committee and copied to the relevant authority within 14 days of the first public announcement or appearance of the notice. Assurances must be made that affected persons have actually received this information and notification.

14.2 Public Consultation Mechanism

Public consultation and participation provide opportunities for informing the PAPs and other stakeholders about the proposed project and eliciting PAP and stakeholder feedback. They also provide opportunities for people to present their views and values and for allowing consideration and discussion of sensitive social mitigation measures and trade-offs, as well as affording PAPs with opportunities to contribute to both the design and implementation of the program activities, while at the same time creating a sense of ownership for the project. In so doing, the likelihood of conflicts between and among the affected and with the management committees will be reduced.

Particular attention shall therefore be paid to public consultation with PAPs, households and homesteads (including host communities) when resettlement and compensation concerns are involved. As a matter of strategy, public consultation shall be an on-going activity taking place during the:

- project inception and planning
- screening process
- feasibility study,
- preparation of project designs
- resettlement and compensation planning
- drafting and reading/signing of the compensation contracts.
- payment of compensations
- resettlement activities and
- implementation of post-project community support activities

Public consultation and participation shall take place through local meetings, radio and television programmes, request for written proposals/comments, completion of questionnaires/application forms, public readings and explanations of the project ideas and requirements.

15. Arrangements for monitoring by the implementing agency

The respective countries' PCUs have overall responsibility for developing monitoring indicators. The PCUs will evaluate and report to the Bank on the activities that are being carried out in compliance with the project design and contracts. The evaluation will rely on both qualitative and quantitative criteria using Bank Guidelines on "Monitoring and Evaluation of Program Impacts."

The PCUs will continuously review expropriation/compensation reports and discuss their outcomes in its technical meetings. The PCUs will also review project activities, including social mitigation measures, and provide guidance.

A monitoring and evaluation plan of the mitigation measures will be established by the PCUs. The scope of these plans will take into account the size of the social impacts to be mitigated while respecting the basic monitoring principles. The plans will describe:

- the internal monitoring process;
- key monitoring indicators (provide a list of monitoring indicators, which would be used for internal monitoring);
- institutional (including financial) arrangements;
- frequency of reporting and content for internal monitoring, process for integrating feedback from internal monitoring into implementation;
- financial arrangements for external monitoring and evaluation, including process for awarding and maintenance of contracts for the duration of resettlement;
- methodology for external monitoring;
- key indicators for external monitoring, focusing on outputs and impacts; and
- frequency of reporting and content for external monitoring and process for integrating feedback from external monitoring into implementation.

15.1 Internal Monitoring

Internal monitoring will be conducted by the respective countries' PCUs, following the plan described above. Likewise, the ministries under which the subproject will be administered will conduct their own monitoring. Quarterly PCU progress reports will include a section on progress made regarding mitigation of adverse social impacts.

15.2 External Monitoring and Evaluation

External monitoring will be conducted through World Bank supervision missions to monitor progress in the mitigation of the adverse social impacts. This would ensure progress on the ground, strengthen analytical capacity, and safeguard proper documentation of operations executed.

Before closure of the process, the respective PCUs will consult with a local NGO to conduct an evaluation of the mitigation measures executed. The evaluation report will be used as a planning instrument to correct pending issues and suggest a post-project monitoring period with the aim of ensuring that PAPs have not been subject to impoverishment induced by project operations.

ANNEX 1: Checklists for Supervision of Resettlement Preparation and Implementation

Checklist 1 – Assessment of Resettlement Implementation and Outcomes

Thematic Checklist

1. Impact inventory and census updating and delivery of compensation
 - ✓ What is the status of engineering design? Are construction drawings completed? Are there any changes in the types and quantities of permanent or temporary impacts? Have the impact inventory and census of the affected population been updated accordingly?
 - ✓ Have the project RAP cost and financing plans been updated accordingly? Have people been informed accordingly?
 - ✓ Have compensation amounts been delivered in a timely way and in full amount, as agreed and scheduled in the RAP (e.g.: before start-up of the works and meeting full replacement costs including fees, transaction costs, etc.)?
 - ✓ How many cases are pending compensation? For what reasons (absentee owners, etc.)?
 - ✓ Are there any outstanding issues related to compensation payments (rates, amounts and timing)? What is the general feedback from the affected population?
2. Resettlement housing and relocation (where applicable)
 - ✓ Have the affected people moved to the new resettlement sites as planned?
 - ✓ Are there any changes in the relocation plan? What are the reasons for these changes? Are these changes justified in line with the RAP principles and objectives?
 - ✓ Have the project office and the Bank reviewed and agreed to these changes?
 - ✓ Have the resettlement housing, site development and related infrastructure and services been completed?
 - ✓ Have people moved into the new houses? If not, why? Where are they? How and when will this be resolved?
 - ✓ Have people been able to access new services? If not, why? How and when will this be resolved?
 - ✓ What are the issues and feedback from the relocated households?
 - ✓ What is the general feedback from the host communities?
3. Income and/or livelihood restoration measures (where applicable)
 - ✓ Have the planned income and/or livelihood restoration measures been implemented?
 - ✓ Are there changes or adjustments to the planned livelihood restoration measures?
 - ✓ How are livelihood restoration measures performing to date?
 - ✓ Is there a need to adjust or propose additional livelihood restoration measures?
 - ✓ What is the feedback from affected communities on livelihood restoration measures?
4. Assistance to vulnerable groups or persons (where applicable)
 - ✓ Who are the vulnerable groups or persons affected by resettlement?
 - ✓ Have vulnerable groups or persons benefited from specific assistance and support as planned in the RAP?
 - ✓ How have these specific measures performed to date?
 - ✓ What is the general feedback from affected vulnerable groups or persons?

5. Consultations and participation

- ✓ Who are the stakeholders during project and RAP implementation?
- ✓ Are public consultation meetings continuing during the project implementation phase?
- ✓ What are the activities planned, implemented and to be implemented for public consultation and participation?
- ✓ Do consultations specifically target affected women and vulnerable groups and persons?
- ✓ Do affected persons have a voice in the evaluation of resettlement outcomes?
- ✓ Is there a record of public consultation and participation meetings?
- ✓ What is the general feedback and key messages from stakeholders during consultation and participation meetings?
- ✓ What are areas for improvement of consultation and participation?

6. Borrower institutions and capacity

- ✓ Are the resettlement institutions set up as planned in the RAP? Are there any changes or delays? Are they affecting RAP implementation?
- ✓ Are the institutions staffed up as planned in the RAP? What is the assessment of staff qualifications?
- ✓ Is the division of labor and responsibilities for RAP implementation clearly understood?
- ✓ What is the assessment of institutional performance?
- ✓ Are there any measures necessary to strengthen the institutions?

7. Monitoring and evaluation

- ✓ Is a monitoring and evaluation system established and functional?
- ✓ Is organization and staffing of M&E system up to expected standards?
- ✓ Are the approach, methodology and reporting arrangements appropriate and sufficient?
- ✓ What is the assessment of reporting quality?
- ✓ Is engagement and interaction with the project office appropriate and adequate? Are monitoring findings feeding back into RAP implementation?
- ✓ Are there any suggestions for improvement?

8. Grievance redress system

- ✓ Is a grievance redress system set up and functioning as planned in the RAP?
- ✓ Is there a record system on grievances received and redressed? Are there minutes of each grievance redress committee meeting?
- ✓ Is the grievance redress system effective in resolving grievances?
- ✓ What are the key grievances received and how have they been resolved?
- ✓ What is the feedback from affected communities on the functioning of the grievance redress system?

Suggestions for Resettlement Supervision Field Visits

- ✓ Document potential and actual impacts using photography, video, and or audio.
- ✓ If possible, during field visits interview a random sample of affected people in open-ended discussions to assess their knowledge and concerns regarding the resettlement process, their entitlements and rehabilitation measures.
- ✓ Observe public consultations with affected people at the village or town level.
- ✓ Use field visits (and separate meetings) to provide technical advice to the Borrower on corrective actions, as needed.
- ✓ Writing field notes may be useful to help record a wide range of issues and reactions that feed into your contribution to the mission Aide Memoire.
- ✓ Share findings of field visits with TTL and inform him/her of key messages you would like to be shared with the Borrower.
- ✓ Share findings of mission with the Borrower through separate meetings on safeguards or at mission wrap-up meeting.
- ✓ Incorporate a safeguards annex (both environment and social) with specific mission findings into the Aide Memoire.
- ✓ Fill out appropriate sections of Tracking Social Performance (TSP) database following mission and share with TTL.

Checklist 2: Documentation of Land Acquisition and Resettlement Performance throughout the Project Cycle

Roles and responsibilities:

- A. *Borrower's Role:* The Borrowers are responsible for managing the social risks and impacts associated to land acquisition and resettlement of their projects to meet the OP 4.12 safeguard requirements, including assessments, preparation and implementation of mitigation plans (e.g. RAPs), engagement with project-affected peoples and other stakeholders, monitoring and ex-post evaluations. The Borrower must systematically document evidence of its activities and outcomes and provide information to the Bank team as needed.
- B. *Role of the Social Development Specialist:* a) assist clients in the process of identification and management of risks and impacts, as well as opportunities, in line with OP 4.01 requirements; b) supervise the client's performance throughout the life of the project; and c) validate the information provided by the client and ensure that it is adequately documented for internal reporting purposes. All activities and findings should be documented in the corresponding project cycle documents (e.g. ISDS, PAD, aide-memoir, ISR, etc) and in the Tracking Social Performance System (TSP). General progress should be reported upon and progress against the performance indicators for RAPs should be mentioned explicitly in the ISRs and aide-memoires, and TSP. BTORs for safeguards only mission: File them in the operations portal and ensure that the findings are incorporated in the next Aide Memoire. The Social Development Specialists advises project management regarding necessary improvements in the implementation of the RAP, if any.

	What needs to be documented?
Concept Stage	<ul style="list-style-type: none"> • Knowledge of OP 4.12 impacts. (Yes/No/Maybe) • If we don't know that there will OP 4.12 impacts, indicate when we will know. • If yes, describe: where OP 4.12 impacts will occur and type and scale of impacts (number of people impacted (families, individuals, business), amount of land required (in hectares), significant risks, etc.). • Instrument that should be prepared (RAP/RPF) with a description of particular areas of focus – e.g. livelihood restoration, vulnerable groups, etc. • Capacity of the implementing agency to mitigate OP 4.12 impacts. (May be very general at this stage.) • Capacity building needs and how they could be met. (May be general at this stage.)
Project Preparation	<ul style="list-style-type: none"> • Knowledge of OP 4.12 impacts. (Yes/No) • If yes, what instruments are being prepared and if necessary, areas of particular focus (livelihood restoration, vulnerable groups, etc.). • Type and scale of impacts (number of people impacted (i.e. families, individuals, business), amount of land required (in hectares), significant risks, etc.). • Confirm that instruments are being prepared in compliance with OP 4.12 (with specific attention to requirements on consultation and disclosure, as required for an RPF or for a RAP). Identify shortcomings and corrective measures.

	<ul style="list-style-type: none"> • Location of impacts (lowest level administrative unit and names of villages/towns). Include maps if available. • Capacity of the implementing agency to implement RPF/RAP. (Reflect an assessment of capacity e.g. previous experience implementing Bank-financed or other MDB projects, number of staff with relevant qualifications, etc.) • Measures that need to be put in place to increase capacity prior to appraisal and/or during implementation. (Include timeline and details on available financing.) • Confirm financing for implementation of RPF/RAP. Where necessary confirm Borrower's internal timelines and procedures for requesting financing for resettlement from parent Ministry and subsequently Ministry of Finance. • Person/position responsible for managing implementation of OP 4.12 and other social issues as necessary. Indicate if it is existing staff, new hire, consultant, etc. <p>Land-related issues that require attention: Voluntary Land Donations (VLD)</p> <ul style="list-style-type: none"> • Ensure that VLD is in compliance with the Bank's policies (Sourcebook p. 22) • Requirements for VLD should be detailed in the Operations Manual together with a template for documentation. (Note: All instances of VLD should be documented by Client and by Bank team in Aide-Memoires.) <p>Due diligence on previously acquired land</p> <ul style="list-style-type: none"> • Ensure that requirements for due diligence are understood. • Undertake and document all due diligence undertaken prior to Appraisal.
<p>Appraisal Stage (Decision Meeting & Appraisal Mission)</p>	<ul style="list-style-type: none"> • Are there going to be any OP 4.12 impacts? (Yes, No). If no, explain why not. • If yes indicate: <ul style="list-style-type: none"> ○ The instrument that has been prepared (RPF/RAP). ○ That the instrument complies with Bank policy. (Vis-à-vis mitigation measures, consultation requirements, costing, M&E, etc.) ○ The extent to which beneficiary concerns were integrated into the project design and/or the resettlement instrument. Note: There is increasing focus on documentation of Borrower-led consultations. Ensure that reporting is thorough on substance and process (such as number of people attending, gender balance, etc.) ○ Implementation risks – related to compliance with OP 4.12, e.g.: low capacity, lack of institutional interest, concerns about lack of money to finance implementation, media scrutiny, etc. ○ Key legal gaps vis-à-vis OP 4.12 that need special measures to be bridged (e.g.: compensation at replacement cost) ○ Disclosure dates - where, when, how, in which languages? ○ The implementation agency unit that will be in charge of social issues, including implementation of the RAP/RPF, managing grievances, etc. ○ Any capacity building measures that have been agreed upon with the Client (including timelines and financing for these activities).

<p>Implementation Support Missions</p>	<p>Monitor implementation of the RAP/RPF and document:</p> <ul style="list-style-type: none"> • Hiring of staff/consultants as agreed at appraisal. • Agreed-upon training (date, attendance, issues addressed, evaluation results if any) of staff. • Any changes in staff and resulting changes in Client capacity. • RAP implementation – data: Aide-Memoires should track all aspects of implementation including preparation of RAPs (where RPFs were prepared prior to Appraisal), implementation start dates, amounts of compensation paid (total number & amount), number of people benefiting from livelihood restoration activities, types of livelihood restoration activities, establishment of grievance redress mechanisms, grievances raised and resolved, etc. • Type and scale of impacts (number of people impacted (i.e. families, individuals, businesses), amounts of land required (in hectares), significant risks, etc.). Make sure to indicate any changes in type and scale of impacts when compared to previous Project stages). • RAP implementation – challenges: Aide-Memoires should track challenges and corrective measures. These may include late identification of need for resettlement, unavailability of funds for compensation payments, identification of additional PAPs, weaknesses in livelihood restoration measures, changes in staffing, weak implementation of grievance redress mechanisms, absence of consultations during implementation, community concerns, etc. • RAP implementation – innovations: Aide-Memoires should highlight any innovations that the Borrower has undertaken to enhance implementation of the RAP/RPF. • Rating of the implementation of OP 4.12. <p><i>Implementation Support Missions Guidelines⁶</i></p> <ul style="list-style-type: none"> • Request progress report from the Borrower before mission to help structure mission activities and dialogue.⁷ • Undertake field visits, validate Borrower reporting (e.g.: Are instruments disclosed? What do communities know about the project and RAP-related issues? Are PAPs aware of grievance redress mechanisms? Are PAPs satisfied with the grievance redress mechanisms? What are community reactions to project implementation and RAP implementation? Are payments in line with RAP?, etc.). • Provide one-on-one technical support to the Borrower by collaboratively identifying challenges and solutions. As necessary, bring in international best practice to the discussion through dialogue and cost-effective means, such as sharing of resource materials, and audio-conferences and video conferences with other technical experts. • Take photographs as necessary to document issues such as cleared ROWs, destruction of assets/crops, areas to be impacted by project, etc. • In the field and in separate meetings, as necessary, provide technical advice to the Client on corrective actions, as needed.
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⁶ See Checklist 1 on *Assessment of Resettlement Implementation and Outcomes*

⁷ See *Checklist 3 on Examples of Information to be provided by the Borrower Prior to Resettlement Implementation Support Mission*.

	<ul style="list-style-type: none"> • It may be useful to prepare field notes that detail the findings of the field visit. • Share findings of field visits with TTL and inform him/her of key messages to be shared with Client. • Share findings of mission with the Client through a separate meeting on safeguards or at mission wrap-up meeting. • Incorporate a safeguards annex (both environment and social) with specific mission findings into the Aide Memoire. • Fill out appropriate sections of Tracking Social Performance (TSP) database following mission and share with TTL.
Project Closing	<ul style="list-style-type: none"> • Summarize the findings of the Client’s assessment of implementation of the resettlement instrument (OP 4.12 para 24) into the Implementation Completion Report (ICR). • Include an assessment of the implementation of the resettlement instrument in the ICR. • Ensure quality of the Resettlement Completion Report.

**Checklist 3:
Examples of Information to be provided by the Borrower
Prior to Resettlement Implementation Support Mission**

The RAP establishes milestones against which resettlement implementation progress is measured. Below are examples of performance milestones. It is good practice to receive progress and monitoring and evaluation reports from the Borrower prior to the resettlement support implementation mission.

Progress made on resettlement implementation planning

- Census, assets inventories, assessments, and socioeconomic studies completed
- Number of public meetings held
- Updated numbers of PAPs – differentiated by types of impact (loss of land and other assets, physical displacement, and loss of income and/or livelihoods) and by gender
- Amount of land affected by the project (size in hectares and number of plots), number of residential structures, commercial establishments and agricultural units totally or partially affected.

Status of resettlement implementation

- Amount of compensation for each affected land plot
- Number of people physically relocated
- Amount of compensation for physically relocated people (disaggregated by structures, assets, transition allowances, etc.)
- Number of compensation payments disbursed and adequacy of timing
- Grievance redress procedures in place and functioning – number of grievances/number of grievances resolved
- Number of businesses relocated and compensated
- Status on the preparation and adequacy of resettlement sites
- Number of housing lots allocated for physically displaced people
- Number of housing and related infrastructure completed
- Number and amount of income restoration and development activities initiated/completed
- Number of trainings and other developmental inputs provided
- Measures undertaken to rehabilitate vulnerable groups (e.g.: women-headed households, children-headed households, disabled, elderly, Indigenous Peoples, etc.)
- Number of informal occupants and measures undertaken to compensate them

- Survey of the standards of living of the affected people (and of an unaffected control group where feasible) before and after implementation of resettlement to assess whether the standards of living of the affected people have improved or been maintained.

Checklist 4:

Overview of Resettlement Instrument Disclosure Requirements during Project Preparation and Implementation

Disclosure during Project Preparation

- Ensure that the Borrower has provided the Bank with a relevant draft resettlement instrument which is in compliance with OP 4.12, and has made it available at a place accessible to displaced persons and local NGOs, in a form, manner, and language that are understandable to them.
- Once the Bank has accepted this instrument as providing an adequate basis for project appraisal, ensure that it is made available to the public through the InfoShop.
- After the Bank has approved the final resettlement instrument, ensure that it has been disclosed by the Bank and the Borrower in the same manner.

Disclosure during Project Implementation

- For projects that prepared a Resettlement Policy Framework (RPF) at the appraisal stage, ensure that a satisfactory Resettlement Action Plan (RAP) or an Abbreviated Resettlement Action Plan (ARAP) that is consistent with the provisions of OP 4.12 is submitted to the Bank for approval before the subproject is accepted for Bank financing.
- Ensure that the resettlement plan or abbreviated resettlement plan is made available to the public through the InfoShop, and locally in the country at a place accessible to displaced persons and local NGOs, in a form, manner, and language that are understandable to them.
- For projects that prepared a RPF at the appraisal stage, but did not require land acquisition or physical displacement of people during project implementation, clearly note this in Aide-Memoires, ISRs and in the institutional social safeguards tracking system

ANNEX 2: Form for the Registration of a Grievance

REGISTRATION OF GRIEVANCE

Please use capital:

From: _____ Contact No: _____
Name: _____
Address: _____

Name of Project Site:

As per the Resettlement Policy Framework of the OECS Tourism Competitiveness Project, Grievance Redressal, I register my grievance as detailed:

“Details of Grievance”

(a) Outline reasons why and how you are affected by the project. (overleaf if necessary)

(b) If land or other properties are being affected e.g. (agriculture), include copies of relevant documentations you have to support your claim.

List documents: attach copies

(a) _____ (b) _____
(c) _____ (d) _____

Undertaking: I hereby certify that statements made in my Grievance and documentation enclosed are true and complete to the best of my knowledge. If at any time any part of the Grievance or the documentation is found to be false, I will be liable for any legal action that the Government may deem necessary.

Date: _____ (Signature of aggrieved person) _____

Name of recording Officer: _____ (Signature) _____

(Please print) List all documentation enclosed: (continue overleaf)
