GEF Leveraging Eco-Tourism for Biodiversity Protection in Dominica (P170846)

# Appraisal Environmental and Social Review Summary Appraisal Stage (ESRS Appraisal Stage)

Date Prepared/Updated: 03/17/2022 | Report No: ESRSA01245

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# **BASIC INFORMATION**

## A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Dominica	LATIN AMERICA AND CARIBBEAN	P170846	
Project Name	GEF Leveraging Eco-Tourism for Biodiversity Protection in Dominica		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Environment, Natural Resources & the Blue Economy	Investment Project Financing	4/25/2022	5/31/2022
Borrower(s)  Ministry of Finance, Ministry of Blue and Green Economy Agriculture and National	Implementing Agency(ies)  Ministry of Agriculture, Ministry of Environment Rural Modernisation and Kalinago Upliftment		
Food Security	Kamago Opintinent		

Proposed Development Objective

Project Development Objective is to improve management of Dominica's three national parks and the Waitukubuli trail

Financing (in USD Million)

Amount

Total Project Cost 3.52

# B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

# C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The project is intended to invest in Protected Areas (PAs) management and support initial operational costs of PAs management implementation in a sustainable approach and with important mutual benefits for biodiversity and local economy. The envisage project will assure the effective elaboration and initial implementation of biodiversity

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conservation measures. It is envisaged that this will also bring the necessary emphasis on the eco-tourism that will lead to increase the revenues from this close to nature. The project consists of three components: (1) Protected Area Planning. This component would support updating and revising strategic and operational management plans for three national parks and for the Waitukubuli trail. (2) Biodiversity and Sustainable Ecotourism Operations. This component would conduct operations and installation of works and programs in line with current park and trail plans. This component also includes institutional strengthening support including preparation of a Divisional Operational Manual describing standard operational procedures for execution of forestry and parks works. (3) Sustainable Livelihoods. This component would address pressing social development needs in the Kalinago Territory through investments associated with the WNT that transits the Territory.

## D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project will take place along the Waitukubuli National Trail (WNT) and the three National Park areas -the Morne Trois Pitons National Park (MTPMP) and the Morne Diablotin National Park (MDNP) and the Cabrits National Park (CNP). The WNT is the first Caribbean long-distance hiking trail and is in major need of management strengthening to attract more visitors. The trail spans 184 km, following generally north to south the ridgeline of the two major mountains of the island. The trail crosses all the major ecosystems of Dominica. The WNT also comes in close proximity to waterfalls, hot springs, wildlife viewing opportunities and other natural attractions. The WNT passes through traditional Kalinago (Carib) villages. The island of Domincia as a whole is still 60 to 75% covered with undisturbed forest which is the most extensive in the Lesser Antilles. It supports a high level of biodiversity which includes over 1,000 species of flowering plants per hectare (ECU, 2000). Five natural vegetation zones exist within the area, plus a small patch of encroaching agricultural land in the south. Its main vegetation is of mosses, ferns, shrubs and stunted trees covered with lichens.

The WNT was opened in 2011 and covers 184 km, spanning and twisting the length of Dominica. The WNT passes through traditional villages of the Kalinago (Carib) Tribe. The WNT's management falls under Forestry Division and the entire trail has been designated an eco-tourist site.

The MTPMP is the largest of Dominica's three national parks and comprises some of the best remaining examples of volcanic island ecosystems. The park protects active volcanic and geothermal areas, mountains, clear streams, various forms of wild fauna, and various types of tropical forest for conservation, educational, scientific, recreational and scenic purposes. The dominant species is Clusia venosa, with Lobelia cirisifolia. Surveys indicate at least 13 species of mammal, 50 birds, 12 reptiles and amphibians and 12 crustaceans, together with 7 species of bats and the introduced black-eared opossum. There are no terrestrial mammals beside feral cats, pigs and 2 species of rat. The park supports one endangered and one vulnerable species of Parrot (Amazona imperialis and A. arausiaca) (Birdlife.org). There is a wide variety of moths and 55 species of butterflies (ECU, 2000).

The MDNP was established in January 2000 and covers some 3,335.4 hectares. It provides habitat for Dominica's two endemic Amazona parrots. Private lands are located mainly on the north, northwestern and southwestern boundaries of the park and used strictly for agricultural holdings. Human settlements are more than 10km away on the western coastal region. This site supports one endangered and one vulnerable species of parrots, and 15 restricted- range species. Black-throated Blue Warbler, Hooded Warbler, Black-and-White Warbler, and Merlin are the more common

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migrant species seen at that site (Birdlife.org). Fauna species include Feral Pigs, several species of bats, snakes, iguanas, frogs, and several species of freshwater fish and crustaceans.

The CNP is located on a peninsula on the north end of the island. Established in 1986, CNP occupies 1,313 acres and protects tropical forests, coral reefs and wetlands. The park is nestled between a pair of low-rising peaks, extinct volcanoes. Dry scrub woodland and a freshwater swamp dominate the immediate terrestrial environment of the CNP. The Cabrits swamp consists of 35 ha along the eastern side of the Cabrits peninsula. The dry scrub woodland is considered one of the most extensive in Dominica. It is dominated by a variety of deciduous tree species and has one of the highest densities of reptiles recorded anywhere in the world. The area is home to the most important populations of butterflies including the endemic Godman's leaf and the endangered endemic Dominican Snout butterfly. The Cabrits has a wide coastal shelf with large expanses of coral reef (GEF, 2016)

#### D. 2. Borrower's Institutional Capacity

The Project will be implemented by an existing Project Implementation Unit (PIU) housed in the Ministry of Blue and Green Economy, Agriculture and National Food Security (MBGEANFS) that also supports the Dominica Emergency Agriculture Livelihoods and Climate Resilience Project (DEALCRP) (P166328). Additional staff will be hired to support LETBP implementation, including by Effectiveness a social development specialist, with terms of reference and experience satisfactory to the Bank. In this vein, to strengthen their capacity to effectively manage E&S risks of this project, particularly considering the challenges of overseeing multiple simultaneous projects and engaging with a wide range of stakeholders, the PIU will include one (1) environmental and one (1) social risk management specialists, the latter who will be hired by Project effectiveness. Additional expertise and support will be further leveraged through the Implementation Support Team (IST) and the central PIU within the Ministry of Finance, which will also support fiduciary functions during LETBP implementation.

Training and capacity building of staff to effectively manage environmental and social issues during project implementation in particular, to carry out continuous stakeholder engagement and grievance management, will also be key to managing risks. These capacity building measures have been incorporated in the ESMF and reflected in the ESCP. The Bank will continue to provide continuous guidance and support to MBGEANFS, IST, and the PIU, for the completion of the project's E&S instruments required by the ESF, as well as provide capacity building and support during project implementation.

# II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

## A. Environmental and Social Risk Classification (ESRC)

Moderate

# **Environmental Risk Rating**

Moderate

The Environmental Risk Rating is moderate because the scope and scale of the project's environmental and social impacts will be small and highly localized. This is a GEF funded project, with a focus to improve biodiversity in the country, particularly within the national parks system. There are many more positive environmental impacts, than negative, such as improved management of protected area and habitat protection for important flora and fauna species. Works are related to trail construction and maintenance, visitor center construction and maintenance, habitat restoration, and any associated activities related to community livelihoods (these are environmentally

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friendly activities but currently undefined). Therefore works associated with both these types of activities will be small in scope and scale, and readily mitigated through standard mitigation measures. In addition, Dominica already has some capacity related to preparing WB projects, the implementing agency is currenlty executing two bank projects, and this additional operation will further build their capacity to manage projects.

Social Risk Rating Moderate

The social risk rating for this project is Moderate. While the principal objectives of the project are to provide benefits to various populations, the planned project works for trail rehabilitation may be carried out in Kalinago (indigenous) territory. The particular impacts may include implications for health and community safety of the community while the works are ongoing. The planned works are not expected to create significant impacts within the communities however, care will need to be taken in how to interact and consult with this group for the minor works but also through Component 3, that will map and plan land use within the territory. Participatory land use mapping with indigenous communities can be a risk if not property executed in consultation with those communities. Culturally appropriate consultations and engagement will need to be developed in order to ensure a fair and equitable process within the community. Cultural heritage is an important feature of the project given the goal is to boost eco-tourism and this includes with the indigenous group. Land connected people often place intangible cultural heritage values on their natural resources and so this needs to be understood and protected through the stakeholder engagement process and development plans that will be created. The initial environmental and social assessment as well as other planned assessments as well as the ESMF for the project should identify the scope of where works or other planning activities that impact indigenous people and include a scope for research and consultation to better understand the context.

# B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

## **B.1. General Assessment**

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

# Overview of the relevance of the Standard for the Project:

This standard is relevant to this project. The project will put in place the necessary architecture for three national parks and one trail in Dominica. Hurricane Maria inflicted significant damage to forests including uprooting of millions of trees and near total loss of foliage. While generally well protected, forests are not well managed. Proper management plans for the three major national parks (all nearly completely forested) have either not been prepared, are out of date, or have never been formally approved and put into effect. Planning and management of public forests outside of parks (approximately 30,000ha, 60% of forest area) is minimal, and works, such as tree planting, timber harvest, stand tending, etc. are extremely limited and only conducted on an ad hoc basis as emergency needs and resources permit.

The positive environmental and social benefits of this project are: a) improved management of the national parks; b) improvement in the financial resources harnessed through eco-tourism to ensure a source of sustainable funds to support the parks systems and c) strengthened individual and institutional capacity to generate a biodiversity-based economy; d) improved land use management within the Kalinago territory; and e) improved opportunities for Kalinago to engage in the eco-tourism sector and other benefit sharing mechanisms. Negative impacts related to the project are few- these include impacts related to minor works such as trail construction and

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rehabilitation/construction of ranger posts and visitor centers. These minor works will have limited and localized impacts but may, for example, a) create minor disturbances such as noise, b) limit trail access to the public; c) require additional measures for waste disposal d) require additional protection for the health and safety of communities and workers. The project will also fund community livelihood activities which are to be environmentally friendly. Since the exact type of activities are currently not determined, the ESMF will be carried out during the project preparation phase, to ensure that no significant impacts on humans and the environment. In addition, to the direct project activities, the assessment should also consider other impacts related to eco tourism related activites.

To assess and mitigate any negative environmental impact, the Recipient will prepare an Environmental and Social Management Framework (ESMF), to describe the procedures to be followed for carring out the environmental and social assessment process. The ESMF will be in line with the ESSs and other relevant WBG requirements and guidelines. The ESMF will include a screening checklist to assess whether the development of additional instruments of assessment and management of impacts (ESMPs) are necessary. Given the type of investments to be financed by the project, the ESMF will also include an Occupational Health and Safety Plan (OHSP), a GRM (with standalone procedures for project-contracted workers) and culturally appropriate and accessible mechanisms for IP and rural communities; and a Chance Finds Procedure to be followed in the case that previously unknown cultural heritage is encountered within the project intervention areas. The ESMF will also include a process framework annex to guide any potential restrictions associated with the management of protected areas under the Project.

The Borrower will also prepare and disclose (before project appraisal) for consultations with stakeholders a draft Stakeholder Engagement Plan (SEP), based on culturally appropriate consultation guidelines and principles for ensuring meaningful participation of stakeholders. The final SEP will be finalized no later than 30 days after the Effective Date.

The Borrower will disclose the draft Environmental and Social Commitment Plan (ESCP) prior to appraisal. The ESCP will include all necessary measures that the project will need to address during preparation and implementation to comply with the ESSs, as well as monitoring and reporting arrangements during project implementation.

In order to address all potential risks, the Borrower will develop the following environmental and social risk management instruments:

- Environmental and Social Management Framework (ESMF), including a project-level GRM that is socio-culturally appropriate and accessible to Indigenous and rural communities, and a generic Environmental and Social Management Plan (ESMP) and a Process Framework (the draft ESMF will be disclosed before the end of appraisal and the final ESMF, incorporating feedback from consultations with stakeholders, will be finalized, adopted by the Recipient and disclosed by 30 days after Effectiveness).
- A Labor Management Procedures (LMP) with a dedicated GRM, and an Occupational Health and Safety Plan (OHSP) (the draft LMP will be disclosed before the end of appraisal and the final LMP will be prepared, adopted and disclosed in country and the Bank's website by 30 days after the Effective Date).
- A Stakeholder Engagement Plan (SEP) with its GRM (the draft to be disclosed before appraisal for consultations with stakeholders, including, importantly, the Kalinago communities in the Project area, and the final SEP, incorporating feedback from consultations with stakeholders, will be finalized, adopted by the Recipient and disclosed in country and the Bank's website by 30 days after Effectiveness)

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- A Process Framework (PF) (which will be an Annex to the ESMF and the draft ESMF will be to be disclosed before enf of appraisal)
- Indigenous Peoples Plan (IPP) (the draft IPP will be disclosed before end of appraisal for consultations with stakeholders, including, importantly, the Kalinago communities in the Project area, and the final IPP, incorporating feedback from consultations with stakeholders, will be finalized and adopted by the Recipient and disclosed in country and the Bank's website by 30 days after Effectiveness)
- A Gender Assessment (to be disclosed before end of appraisal)

# **ESS10 Stakeholder Engagement and Information Disclosure**

The standard is relevant. The Recipient undertook a stakeholder mapping and analysis during Project preparation, identifying and assessing project affected people, beneficiaries, and other categories of key stakeholders. At this stage, major stakeholders include the different government agencies, the communities, the Kalinago in the Project area, tour operators, environmental NGOs, civil society organizations, etc. The Recipient has developed a Stakeholder Engagement Plan (SEP) to guide the process of engagement with stakeholders during project preparation and during the life of the project. The SEP assesses stakeholders, including beneficiaries and project-affected parties, with a focus on disadvantaged or vulnerable groups, such as the Kalinago, for example, and outlines any specific measures to remove obstacles to participation and to allow for their effective engagement. The SEP will be updated and redisclosed (as needed) during implementation. The Recipient has developed a project-level Grievance Redress Mechanism (GRM), which is set out in the SEP, with socio-culturally appropriate and accessible mechanisms for communities that will be operational and monitored throughout Grant implementation. The SEP with its GRM will be disclosed prior to appraisal.

The draft SEP (with its GRM) has been consulted with stakeholders, including the Kalinago, prior to appraisal. Consultations have taken into account the limitations on public meetings due to the COVID-19 health emergency and have been and will continue to be carried out in a manner consistent with the World Bank technical guidance on "Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings, March 20, 2020." This is especially the case for vulnerable and marginalized groups in hard to reach locations.

The draft SEP and draft ESCP, were publicly disclosed in-country in May 2021 in the Project's website. The draft SEP will be further consulted during appraisal and will be finalized, incorporating stakeholders' feedback and to reflect recommendations received and adopted and redisclosed no later than 30 days after the Effective Date, and thereafter will be updated and redisclosed as needed throughout the life of the project.

# **B.2. Specific Risks and Impacts**

A brief description of the potential environmental and social risks and impacts relevant to the Project. ESS2 Labor and Working Conditions

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The standard is relevant. The Recipient has prepared draft Labor Management Procedures (LMP), which will be finalized by no later tha 30 days after the Effective Date. The LMP considers the following type of workers: (i) direct workers (including project coordinator, specialist, environment and social specialist, and technical, administrative, and support staff according to the project's demand); (ii) contracted workers (specialist in the design and implementation of civil works; specialists in the design of infrastructure for trails and guest services infrastructure; among others); (iii) community workers; and (iv) primary supply workers (for example, personnel of the main suppliers responsible for the delivery of material supplied for the subprojects). Community workers are not anticipated. Project implementation will involve various Project workers, ranging from PIU staff to specialized personnel of contractor firms as well as unskilled laborers. Civil servants working in connection with the project full-time or part-time will remain subject to the terms and conditions of their existing public sector employment or agreement unless there has been an effective legal transfer of their employment or engagement in the Project, though they remain subject to the ESS2 paragraphs 24-30 on OHS.

The number of eventual workers is currently unknown. It is not expected that workers from off island will be contracted or be involved in the trail rehabilitation works, which are expected all to be very minor works. The exact types of project workers is not yet known, although direct workers, contracted workers, as well as engaging workers from local communities for small-scale works are anticipated. Given the limited number of exisiting staff, it is not expected that the MBGEANFS will be invovled in implementing works under this project. These works will likely include mostly non-skilled activities and no heavy machinery will be utilized.

The LMP provides an overview of applicable legislation, expected types of personnel to be hired under the project, and measures to comply with ESS2, screening of labor related risks or issues, measures to prevent child labor and forced labor, minimum salary, and work hours, procedures for worker's GRM, and COVID-19, risk mitigation measures for workers. The project will not hire people younger than 18 years old, and MBGEANFS will monitor compliance in all project investments. The LMP will be reviewed and updated throughout project implementation as required, considering the activities to be undertaken in each subproject and as additional project activities unfold entailing additional labor related risks or issues.

To ensure the health and safety of workers during the construction and operational phases of the project investments, the Borrower developed OHS Plans as part of the ESMF and ESMP in line with the WBG's EHS Guidelines. The OHS Plans include procedures for incident/accident investigation and reporting, recording and reporting of nonconformances, emergency preparedness, response procedures, and continuous training for workers. The ESMF (and ESMPs when available) include OHS measures for infrastructure activities to address specific risks amid the COVID-19 pandemic.

Bidding documents for all investments will include OHS considerations, adoption and enforcement measures for the Code of Conduct, and labor considerations such as labor influx (if applicable, which at this stage is not anticipated), no discrimination, equal opportunity, prevention of all forms of forced labor. The Recipient will actively be monitoring these bidding processes throughout the project cycle to ensure adherence to the standard.

The LMP includes a code of conduct for project workers with dimensions related to SEA/SH (rating for SH/SEA risks is Low). Measures will be implemented, commensurate with the Risk rating as described in the Bank Good Practice Note on Addressing Sexual Exploitation and Abuse and Sexual Harassment in Investment Project Financing involving Major Civil Works. The project will (i) determine a methodology for identifying/mapping available GBV service

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providers in the project areas during project implementation; and (ii) elaborate procedures of referral to service providers if SEA/SH cases arise. To ensure that the project promotes safe workspaces for women, and to avoid that beneficiaries and workers become targets of SEA/SH, the final LMP will include a code of conduct addressing respectful interaction with the community in general and SEA/SH in particular. Both the labor GRM as well as the overall project GRM will include specific procedures and train personnel, to register and refer potential complaints related to SEA/SH.

# **ESS3 Resource Efficiency and Pollution Prevention and Management**

This standard is relevant. The project will be designed with energy efficiency measures. In addition, procurement processes must promote and incorporate the use of efficiency products, by articulating them in bidding documents. Where cost effective and appropriate, energy efficiency will also be a key criteria for computer and hardware purchases. In addition, project does not plan to use any pesticides or herbicides, however the need for termite control needs to be understood, and if this determination is changed prior to appraisal, an Integrated Pest Management Plan (IPMP) will be developed and included as part of the ESMF. The ESMF will define institutional responsibilities and guide the preparation of the IPMP as needed, including sufficient budget for equipment and capacity building. The requirements for managing the construction waste and debris which will be generated by the project activities will be described in the ESMF and in the site-specific ESMPs. With the proposed activities known at this time, it is unlikely that hazardous waste will be produced, nor will there be release of pollutants into the air.

Waste Management: The ESMF will determine the provisions needed for the management of waste. All waste generated by project activities will be disposed according to national regulations and Good International Industry Practice (GIIP) as specified in the World Bank's EHGS.

Raw material use: The client will adopt measure through the ESMF, as specified in the EHSGs and other GIIP, to support efficient use of raw materials to the extent technically and financially feasible. The ESMPs will also consider the potential use of raw material that could be necessary for conservation and restoration activities on the trails.

Vegetation and soil loss: Localized soil removal and clearance of vegetation may occur particularly during the interventions on the trail. The ESMF includes generic measures covering these types of impacts.

GHG Emissions: As part of project preparation, an estimate of the project's greenhouse gas mitigation potential was prepared informed by the Ex-Ante Carbon-balance tool (EX-ACT) of the Food and Agriculture Organization of the United Nations (FAO). Over the 20-year period considered for the analysis, the gross GHG emissions from the project are expected to amount to a net carbon sink of 667,757 tCO2-eq. However, when considering the emission in the without the project scenario, it will result in a net carbon source of 80,660 tCO2-eq. The largest contributions to the expected emission reductions is attributable to emissions from avoided deforestation and sustainable forest management.

**ESS4 Community Health and Safety** 

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# ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This standard is Relevant. It is unlikely that there will be any need for resettlement or land acquisition in this project, since trail rehabilitation works will be contained to existing trails and new trails will be created within protected park lands where there are no settlements and do not overlap with IP lands. Other works will occur on government owned land and property. No land acquisition will be needed however there may be restricted access to some of the trails during the construction which can be managed through the ESMF and ESMP for ESS1. There is the possibility that the outcome of changes to the park user fees and the creation of zones within the national parks will have the effect of restricting access to natural resources for some current users, in which case the Process Framework which is annexed to the ESMF would guide such restrictions.

## ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is relevant as the project focuses on maintaining natural habitats. The ESMF will outline the characteristics of these habitats under the project and include relevant baseline information and an assessment of the quality of that information. However, regardless of the area identified for activities, the impact of this project will be largely positive. This project is not expected to degrade any habitat and will involve communities in livelihood generation activities. The project will also train communities to provide guide and interpretation services to tourists. In addition, the ESMF will ensure that habitat mapping will preceed all works related to trails and other works, and land use planning, to avoid impacting flora and fauna species, particularly native or endemic species. This is of minor concern given that most of the trails construction will only involve the clearing of surrounding shrubs. However, careful attention will be paid to restoration activities to ensure that biodiversity is maintained and that native species are not inadvertently replaced with invasive species or other species that would alter the current habitat. The use of

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the management plans will guide the project's activities. The ESMF will address the potential use of invasive species and will include mitigation activities accordingly. In addition, the ESMF will include an assessment of the adequacy of existing baseline data, including habitat mapping. Where relevant, additional baseline surveys may need to be carried out to ensure that the project (and related protected area management plans) are developed in such a way so as to avoid any further degradation or conversion of natural/critical habitats.

It is envisioned that the ESMF will also consider operational phase issues such as maintenance and carrying capacity of the parks and trails as well as indirect impacts and potential for encroachment or economic activity (formal and informal) from increased tourist traffic in the areas of focus of the project. Following local legislation and procedures, private operators of tourism will be sensitized appropriately to natural habitats and their significance in the economy.

# ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This standard is Relevant. It is unlikely that there will be any need for resettlement or land acquisition in this project, since trail rehabilitation works will be contained to existing trails and new trails will be created within protected park lands where there are no settlements and do not overlap with IP lands. Other works will occur on government owned land and property. No land acquisition will be needed however there may be restricted access to some of the trails during the construction which can be managed through the ESMF and ESMP for ESS1. There is the possibility that the outcome of changes to the park user fees and the creation of zones within the national parks will have the effect of restricting access to natural resources for some current users, in which case the Process Framework which is annexed to the ESMF would guide such restrictions.

# **ESS8 Cultural Heritage**

This standard is relevant. While project activities are not expected to have a negative impact on tangible or intangible cultural heritage, the relevance of this standard will be further assessed during project preparation. Dominica has many historical sites and important heritage, as mentioned earlier, one of the project sites (Morne Trois Pitons) is a UNESCO World Heritage Site. The project's focus is national and protected parks are likely an inherent cultural value to the country. Indigenous people are often land connected people and place value on their land and natural resources, therefore the Kalinago's territory likely holds both tangible and intangible cultural heritage. While the project may increase traffic through important areas it also has the opportunity to provide enrichment and enhance the protection of Cultural heritage when managed properly in partnership with their custodians. An approach that maximizes indigenous knowledge and community participation can increase the benefits of the project. The ESMF includes a Chance Finds Procedure to be followed in the case that previously unknown cultural heritage is encountered during land restoration and green cane harvesting activities within the project intervention areas. The ESMF also require the development of management plans that include an approach to documenting and protecting sacred and culturally important sites in partnership with the people who hold these sites to be important.

#### **ESS9 Financial Intermediaries**

This standard is not relevant.

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# C. Legal Operational Policies that Apply

## **OP 7.50 Projects on International Waterways**

No

# **OP 7.60 Projects in Disputed Areas**

No

B.3. Reliance on Borrower's policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?

# Areas where "Use of Borrower Framework" is being considered:

The project does not intend to use the borrower's framework

## **IV. CONTACT POINTS**

#### **World Bank**

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## Borrower/Client/Recipient

Borrower: Ministry of Finance

Borrower: Ministry of Blue and Green Economy Agriculture and National Food Security

# Implementing Agency(ies)

Implementing Agency: Ministry of Agriculture

Implementing Agency: Ministry of Environment Rural Modernisation and Kalinago Upliftment

# V. FOR MORE INFORMATION CONTACT

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# **VI. APPROVAL**

Task Team Leader(s): Winston Dawes, Kevin McCall

Practice Manager (ENR/Social) Maria Gonzalez de Asis Cleared on 11-May-2021 at 09:28:40 GMT-04:00

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