

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

**Stakeholder Engagement Plan (SEP)  
For  
GEF Leveraging Eco-Tourism for Biodiversity Protection in  
Dominica (LEToBP)**



**DRAFT – version 2**

**May 9 , 2021**

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# 1. INTRODUCTION

## 1.1 Project Background

Dominica is home to biodiversity of world significance; the island geography and complex geology have created unique habitats and high species diversity. Key biodiversity habitats are part of Dominica's forest system, one of the richest and most extensive ones in the Lesser Antilles. Dominica is known as the 'Nature Island' and has the most extensive natural forests in the Eastern Caribbean of around 43,000 ha and is home to the most diverse assemblage of wildlife among the smaller Caribbean islands. The vegetation types (flora) include littoral woodland, elfin woodland, semi-deciduous forest, mature rain forest, montane forest, scrub woodland and savannah. Other natural vegetation types are influenced by soil conditions including wetlands and fumarole vegetation.

Poorly regulated tourism could emerge as a threat to Dominica's biodiversity, due to weak environmental controls and inadequate integration of protected areas. Biodiversity in Dominica is therefore currently facing habitat loss due to tourism development, primarily in the Cabrits National Park in the North and the unsustainable pressure placed on ecotourism sites encroaching on turtle nesting sites and wetlands habitat for crabs. Secondly, Agriculture and land degradation including deforestation are two of the greatest contributors to loss of indigenous biodiversity. Private landholdings of forested areas threaten biodiversity due to habitat fragmentation and poor agricultural practices such as the use of agrochemicals. Thirdly, the weak legislative framework that is not conducive to strong biodiversity management. Poor legislative framework was attributed by available budgets for biodiversity and its low contribution to economic growth and lack of environmental impact assessments. Irregularities in weather patterns and effects of climate change and more recent hurricane Maria introduce additional complexities into biodiversity management and conservation, thus focusing on maintenance of a healthy ecosystems.

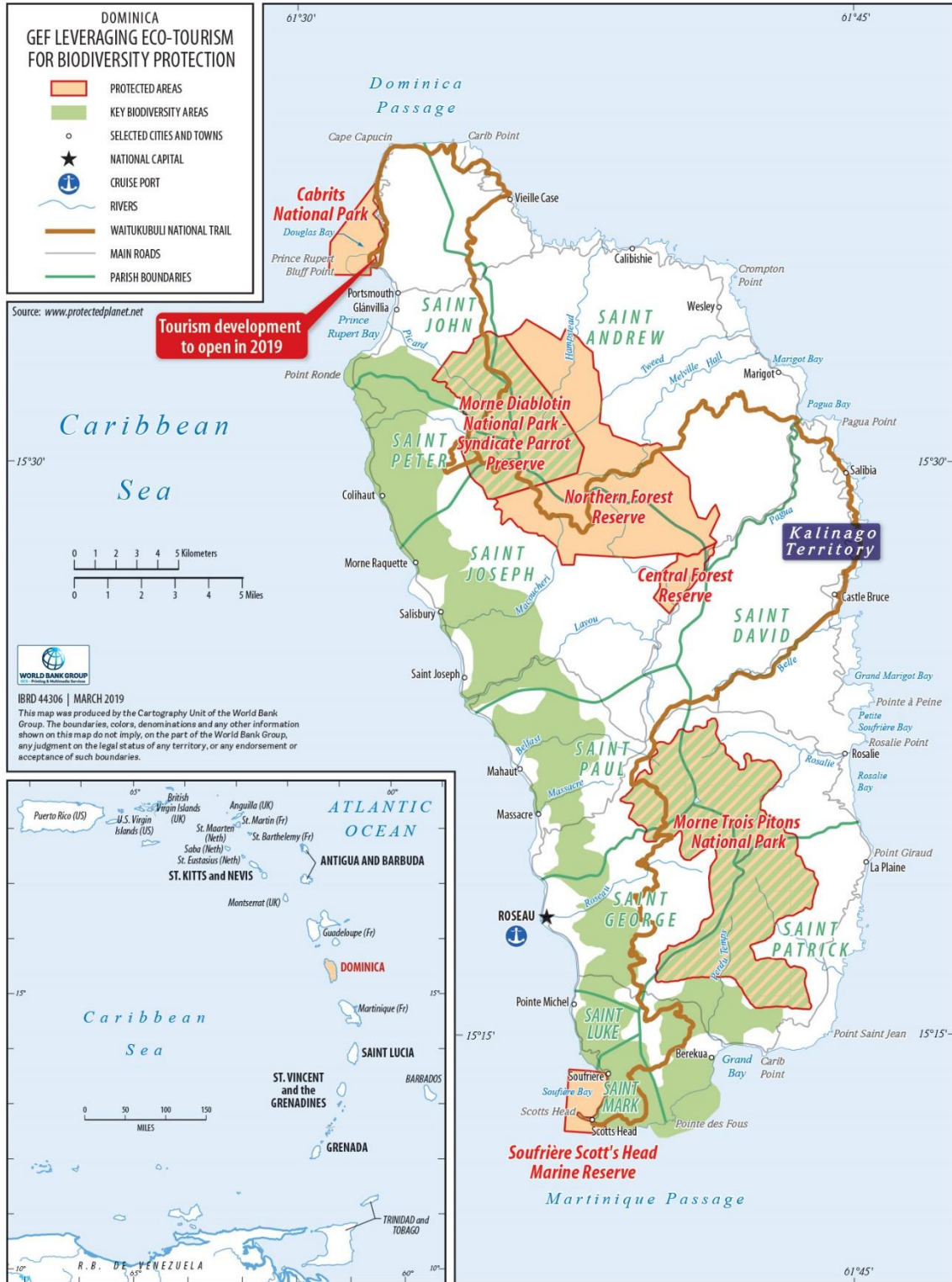
## 1.2 Targeted Ecotourism Areas by the Project

The Waitukubuli National Trail (WNT) and Dominica's three national parks are a cornerstone for Dominica's eco-tourism potential, which needs further expansion. The WNT is the first Caribbean long-distance hiking trail and is in major need of management strengthening to attract more visitors. The trail spans 184 km, following generally north to south the ridgeline of the two major mountains of the island, each of which anchor national parks. The trail crosses all the major ecosystems of Dominica, provides unmatched opportunities for observing the country's biodiversity. It crosses the Kalinago Territory home to the indigenous Kalinago (Carib) people. Some 100-130 thousand international visitors visit the WNT annually and contribute to a wide variety of tourism-based enterprises ranging from hotels and guest houses to restaurants and guide services. The three national parks are the Morne Trois Pitons National Park in the south, the Morne Diablotin National Park in the northern mountain range and the Cabrits National Park in the north near the town of Portsmouth. The national parks and trail network are managed by

the Forestry Division of the Ministry of Environment Climate Resilience, Disaster Management and Urban Renewal, in cooperation with the Ministry of Tourism and Culture, to the constrained extent that current levels of public budget permit.

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**Map 1: Waitukubuli National Trail (WNT) and National Parks**



### 1.3 The Project Description

The Leveraging Eco-Tourism for Biodiversity Protection Project (LEToBP or the Project) is funded

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

The development objective of the project is to improve management of Dominica’s three (3) national parks (Morne Trois Pitons, Morne Diablotin and Cabrits), and the Waitukubuli trail. Specifically, the project includes analyses, coordination efforts and capacity building that will improve protection and management of three national parks and the Waitukubuli National Trail (WNT), and offer new livelihood opportunities for local people of the Kalinago territory and communities adjacent to the parks. Investments in on-the-ground activities to demarcate national parks boundaries and buffer-zones and improve sustainable ecotourism operations have been prioritized due to biodiversity significance and value of targeted areas, needs for strengthening governance and raising human capacities, and the involvement of local stakeholders in sustainable resource use and reviving traditional knowledge and skills. Targeted area of the project encompasses even 14,135 ha or 18.85% of the country’s territory, as presented in the following Table 1. Coverage of targeted areas<sup>1</sup>.

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

The project consists of four (4) components each addressing key development and sustainability constraints for eco-tourism and biodiversity protection, and mutually supporting the overall Project Development Objective ‘To improve management of Dominica’s three national parks and the Waitukubuli National Trail (WNT)’:

- **Component 1:** strengthening the institutional framework and strategic planning and management and improving national and local capacities for PA monitoring and management
- **Component 2:** improving the infrastructure and efficiency of service support for eco-tourism operations

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

- **Component 3:** enhancing opportunities for sustainable livelihoods and reviving traditional knowledge of indigenous community Kalinago and linking territory via feeder trails to WNT and eco-tourism sites.
- **Component 4:** project management, coordination and evaluation and will be implemented through the entire project area.

The outcome of this project is to transform the tourism sector from being a potential threat to a sustainable opportunity for the management and protection of biodiversity in Dominica. This will be achieved by strengthening the management of protected areas and the trail network, and by expanding their sustainable eco-tourism use. The project is also in line with GEF's Biodiversity Focal Area objective to maintain globally significant biodiversity in landscapes, supported through inclusive conservation and addressing direct drivers of habitats loss, through improved financial sustainability, effective management, and ecosystem coverage of the protected area estate.

The environmental and social risk classification of the project is Moderate under the World Bank Environmental and Social Standards (ESSs) based on the nature and scale of the Project intervention. It may be noted that given the limited scope of physical works and their locations within existing national parks and Protected Areas outlined above, the potential impacts and risks are considered to be moderate, minor or negligible.

#### 1.4 Objectives of the SEP

One of the documents required by the GEF and the World Bank (as Trustee and Implementing Agency of GEF) in the preparation of this project is the Stakeholder Engagement Plan (SEP), in line with ESS10 of the World Bank. The SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The goal of this SEP is to enhance social and environmental sustainability of the Project by improving and facilitating decision making and creating an atmosphere of understanding that actively involves Project-affected people and other stakeholders in a timely manner, and that these groups are provided sufficient opportunity to voice their opinions and concerns that may influence Project decisions from an early stage. Specifically, the SEP will:

- Establish a systematic approach to stakeholder engagement that will help the project identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- Assess the level of stakeholder interest and support for the project, and to enable stakeholders' views to be considered in project design and environmental and social performance.
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and

- appropriate manner and format.
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow the Borrower to respond to and manage such grievances.

## 2. STAKEHOLDER IDENTIFICATION

### 2.1 Stakeholder Identification and Analysis

The nature and scope of the project and its potential risks and impacts on the natural environment, communities and individuals requires that key stakeholders be identified. This should include but not be limited to government authorities, local organizations, NGOs, and companies, Kalinago indigenous community, cultural groups, tour operators, hotel and cottage owners, hand craft and communities bordering the national parks and Waitukubuli National Trail (WNT). The identification of stakeholders is the first step to foster the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. The participation of the identified stakeholders is aimed at improving the environmental and social sustainability of the project, enhance project acceptance, and make a significant contribution to successful project design and implementation.

The Project has identified two distinct groups of stakeholders' (i) project-affected parties such as Kalinago community, farmers, cooperatives, etc. and (ii) other interested parties such as hikers, Tour Operators, Hoteliers, etc. Additional stakeholders were also identified, individuals or groups (academia) who may have different concerns and priorities about project impacts, mitigation mechanisms and benefits, and who may require different, or separate, forms of engagement.

#### 2.1.1 Government Ministries, Agencies and Departments

- Ministry to Tourism international transport and Maritime Initiatives

The goal of this Ministry is to provide the enabling environment to facilitate the development and expansion of economic activities in tourism in a manner consistent with development goals, so as to contribute to national economic growth, while maintaining an efficient and effective justice system, that enhances the quality of life for both residents and visitors. The Tourism Sector, primarily, the Discover Dominica Authority would be most at stake within this Ministry. Tourism has significant economic gains to be attained when tourists visit the ecotourism sites or traverse the WNT.

- Ministry of Environment, Rural Modernization and Kalinago Upliftment

The Kalinago Territory will be impacted primarily because it is the home of the indigenous people and a segment of the WNT passes in that area, thus these indigenous people should have an economic opportunity for income generation under the Project. The Forestry, Wildlife & Parks Division is responsible for the maintenance and upkeep of the Botanic Gardens and other public areas in the greater Roseau area, and National sites within the island's National Parks System, including the Morne Diablotin National, Morne Trois Pitons National Park and the



Cabrits National Park. Several other nature sites which are not within the established national parks, e.g., the Soufriere Sulphur Springs area, Indian River, Trafalgar Falls, are also under the jurisdiction of the Division. The Unit is also responsible for implementing the [‘User Fee’ programme](#) at twelve (12) eco-tourism sites around the island.

- The Ministry of Blue and Green Economy, Agriculture and National Food Security  
The Division of Agriculture is responsible for providing technical assistance, regulatory and support services and the policy framework to guide development of agriculture. The Division consists of several specialized units, working collaboratively with agricultural agencies to provide technical, regulatory and support services. The Division of Agriculture will provide technical assistance for agritourism projects.

- Ministry of Youth Development and Empowerment, Youth at Risk, Gender Affairs, Seniors Security and Dominicans with Disabilities  
The Unit under this Ministry that will be engaged as stakeholder will be the Division of Gender Affairs and Youth Development Division. The ministry provides efficient and effective services geared towards the empowerment of Dominicans in their quest to contribute to individual, community and national development; shall promote, develop and preserve Dominica’s cultural heritage.

- The Ministry of Sports, Culture and Community Development  
The Ministry’s primary purpose is to develop, advance and protect co-operative enterprise. The department of Community Development is important since numerous communities will operate small cooperative along the trail and may be impacted by the renovation of the trails and eco-site through the establishment of small business.

#### 2.1.2 Civil Society and Non-Governmental Organizations, Academia

Civil society, non-governmental organizations and academia may have in-depth knowledge about the environmental and social characteristics of the project area and the nearby populations, and can help play a role in identifying risks, potential impacts, and opportunities for the project to consider and address in the assessment process. There are individuals with strong academic background in the area of conservation or tourism development, most of whom are retired and would like to participate and contribute toward the development of ecotourism in Dominica. There may be environmental groups not present in the project development areas; however, they may be interested in the project due to its long-term benefit to Dominica’s biodiversity.

#### 2.1.3 Disadvantaged and Vulnerable Individuals or Groups

The Project may disproportionately impact disadvantaged or vulnerable individuals or groups, who will often do not have a voice to express their concerns or understand the impacts of the Project. The Project has a specific objective of ‘leaving no one behind’ consistent with the Agenda 2030 Sustainable Development Goals and as such the Project intends to promote gender equality as well as reduce inequalities in the tourism sector. The LEToBP will focus on

the following groups during all phases for their full involvement in the execution of this Project:

- Kalinago indigenous peoples.
- Ensure that women are consulted and engaged, and their views and perspectives are considered in all aspects of the project in which stakeholder engagement will be undertaken. Specific strategies will be developed to ensure that women who are engaged in the tourism as handcraft makers, restaurant or guest houses along the trail or villages near the national parks.
- Amongst women that will be targeted, special attention will be paid to the Kalinago indigenous women so that their views and concerns can be addressed throughout the stakeholder engagement process and they can benefit from Project opportunities, including jobs and capacity building. The Kalinago territory is an important part of this project. As a result, Kalinago women have been identified in the project as a vulnerable group and as such, will be afforded special attention by which the project team can engage in discussions either individually or collectively with them about their views and perceptions of the Project, and will incorporate their feedback, as appropriate.
- Youth are another group that will be considered in much the same way as the issues surrounding the participation of women.
- Farmers residing along the WNT will be of vital importance in terms of their knowledge of herbal plants and history of the area, which they can bestow to the youth.
- Disabled peoples and their representatives.

## 2.2 Stakeholder Needs

<b>Stakeholder</b>	<b>Information Needs</b>
Government Ministries <ul style="list-style-type: none"> <li>• Tourism</li> <li>• Environment (Forestry)</li> <li>• Agriculture (EALCRP)</li> </ul>	Technical information on how the project will work; the type of support and technical competence required by government entities; roles and responsibilities, potential costs on the fiscal side etc.
<ul style="list-style-type: none"> <li>• Cooperatives and NGO</li> </ul>	Information on the project and how it would benefit the Tourism sector, including cooperatives doing craftwork and agriculture.
Tourism Industry and others including Association (DHTA), Tour operators, Guest House Owners, Farmers etc.	Simple non-technical information on the project in an engaging and easy to read manner on the proposed benefits; how insurance would work; what is needed from them; how could their knowledge be used in the development and implementation of the project etc.
Kalinago Indigenous Communities	Simple non-technical information on the project in an engaging and easy to read manner on the proposed benefits, communicated in a culturally appropriate manner in line with ESS7
Organizations representing disabled	Simple non-technical information on the project in an

people	engaging and easy to read manner on the proposed benefits
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## 2.3 Stakeholder Engagement Program

An initial working group was established by the Government of Dominica with representatives from Government Institutions Forestry-(Parks and Wildlife), Ministry of Environment, Rural Modernization and Kalinago Upliftment, Discover Dominica, Ministry of Blue and Green Economy Agriculture and National Food Security, Whitchurch Tour Operator, Kalinago Council and an Independent Consultant to discuss the preparation and implementation of the project. The Project's PIU will continue to build on these initiatives, as well as an adopt a multi-stakeholder engagement process to disclose information and consult the public throughout the project implementation. The Project's PIU Communications Officer will be responsible for the day-to-day stakeholder engagement activities.

### 2.3.1 Proposed Strategy for Information Disclosure

A variety of communication methods will be used to reach the majority of stakeholders. The project will select those that are most appropriate considering stakeholder location, means of receiving information and their ability to understand the information provided. This is essential for vulnerable groups and the disadvantaged. The following communications methods will be used, but will not be limited to:

- Newspapers- The New Chronicle and The Sun
- Internet- Dominica News Online
- Radio Programs- DBS radio, Q-95, Kairi FM and Dominica Catholic Radio
- Television- Government Information Service
- Brochures, leaflets, posters will be developed and placed at Information centers: Tourism information facilities, hotels, Forestry
- Official correspondence of consultation from the Manager of the Project thru emails, invite letters to meetings
- The Project Website will be used to inform the general public of the LEToBP, and schedule events.
- Social media in form of developing a WhatsApp group for subcommittee within the general stakeholder.
- Individual notifications to certain Project stakeholders

The development of all communication and information materials will be guided by the following:

- Clear messages using simple language, with a lot of visual and signage for stakeholders with difficulty seeing or reading
- Openness, honesty, credibility, and trust in all communications, information presented must be factual.

- Two-way communication, with feedback, question and comments welcomed for further discussion and consideration and fully incorporated in the Project, where possible.
- Ongoing commitment to the communications process, several meetings must be conducted in order to reinforce the information and for those who were absent on previous consultation
- Tailored to specific groups, content must be interesting to the target audience, for example when addressing the Kalinago speak, in a culturally appropriate manner and in line with the World Bank requirements of ESS7, to material of the ecotourism sites in their area and show how they can benefit.

All stakeholders will continue to receive information on the Project and new developments even after the launch of the Project. This would be achieved using the Project communication platforms as well their distribution channels for communication referenced in this section.

### 2.3.2 Proposed Strategy for Consultation

The advent of the COVID 19 pandemic and its impact on Dominica has resulted in a revision of the consultation strategy delivery method to be changed from unlimited face to face (no social distancing) meetings to virtual meetings and/or limited face-to-face meetings with social distancing and strict adherence to COVID19 mitigation measures in place in Dominica and set out in the Project's environmental and social risk management instruments. The Government of Dominica and the Ministry of Health, Wellness and New Health Investment's COVID Guidelines and Protocols have been adopted by the Project and will be implemented throughout the Project implementation, as required. The following COVID 19 measures will be used and adopted by the PIU for Project-related consultations and stakeholder engagement activities that require active participation:

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

- Specify how stakeholders can provide feedback and until when, when they do not have access to online channels or do not use them frequently.

Consultation meetings will be recorded and documented by the Project PIU, to capture comments from participating stakeholders. Consultations on the project are expected to involve the Government, cooperatives, ecotourism groups and Kalinago communities, and other key stakeholders, including, in particular, Project affected stakeholders and vulnerable groups, will be supported by participatory processes. The preferred means of consultation is a public meeting (face to face) with power point presentations, posters and brochures while respecting social distancing. The presentation will take the format where stakeholders can both listen, read and see photos of what is being discussed. With regards to location and venue for meetings, they will be conducted some in the Kalinago Territory and relevant communities that are likely to be impacted by the development of the national parks and WNT.

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

### 2.3.3 Consultation Timeline

Stakeholder consultation will commence in the second Quarter of 2021 and is expected throughout the life of the Project. Initial consultation will commence with the key stakeholders such as government Ministries (Environment, Forestry, Tourism etc.), affected communities and individuals (with a focus on obtaining women's perspectives and feedback), Kalinago indigenous peoples, disabled people and organizations representing their interests, environmental NGOs, other interested parties and civil society organizations, etc. The PIU will be responsible for coordinating all consultations.

### 2.3.4 Stakeholder Feedback

Stakeholder feedback will be solicited, recorded (meeting minutes) and monitored throughout the life cycle of the project, especially at all public meetings and workshops, where information will be provided on the project. In addition, the PIU through its Communications Officer will receive and record stakeholders' queries, concerns and complaints, as well as provide responses to how their feedback can be incorporated or not in the Project or for project related issues. Specifically, comments will be gathered (written and oral comments) and reviewed and reported back to stakeholders on the final decision(s) or actions to be taken to address their concerns and incorporate their feedback and how in the Project. The PIU will ensure that if decisions on public

meetings, locations, and timing of meetings have not yet been made, provide specific information on how people will be made aware of forthcoming opportunities to review information and provide their views.

Additionally, stakeholders will have an opportunity to file complaints against the project, project related activities and staff through a Grievance Redress Mechanism (GRM), which is described below in this SEP.

### 2.3.5 Roles and Responsibilities

The overarching implementation and monitoring of the project’s SEP will be the responsibility of the PIU. The direct day to day management of the SEP will be handled by Communications Officer with the support of the Environmental Officer and the Social Officer of the Project. The Communications Officer will brief all PIU staff, the relevant Government ministries, agencies and departments, consultants and contractors, communities and other relevant stakeholders on the procedures and formats to be used including reporting procedures and grievances. The Communications Officer, with the support of the environmental and social staff, will be devoted to managing and implementing the Stakeholder Engagement Plan, specifically documenting, tracking and managing (for example, stakeholder database, etc.), as well as providing contact information if people have comments or questions about the project or the consultation process; that is, phone number, address, e-mail address, title of responsible person(s).

Role/Position Title	Responsibilities
Project Manager	<ul style="list-style-type: none"> <li>• Manage and implement the Stakeholder Engagement Plan (SEP)</li> <li>• Dissemination of project information</li> </ul>
Communications Officer, with the support and in close coordination with the two environmental and social staff referenced below	<ul style="list-style-type: none"> <li>• Interface with stakeholders and respond to comments or questions about the project or consultation process.</li> <li>• Provide contact information if stakeholders have questions or comments about the project or consultation process.</li> <li>• Document any interactions with Project stakeholders.</li> <li>• Maintain database, records for SEP</li> <li>• Coordinating public meetings, workshops, focus groups etc.</li> <li>• Makes sure the SEP is being adhered to and followed correctly.</li> <li>• Raise awareness of the SEP among project implementation unit, employees</li> </ul>

Role/Position Title	Responsibilities
	contracted firms and relevant external stakeholders.
Environmental Officer Social Officer	<ul style="list-style-type: none"> <li>• Provide technical support and guidance to the communications officer on SEP, including without limitation, on how to engage with vulnerable stakeholders (Kalinago) and how to respond to environmental and social issues raised by stakeholders and how to incorporate stakeholder feedback in SEP revisions and other Project documentation/design.</li> </ul>

2.3.5 SEP Monitoring and Reporting

The PIU will monitoring and evaluate the stakeholder process throughout project implementation to ensure the project is able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. Monitoring of the stakeholder engagement process allows the efficacy of the process to be evaluated. Specifically, by identifying key performance indicators that reflect the objectives of the SEP and the specific actions and timings, it is possible to both monitor and evaluate the process undertaken. Two distinct but related monitoring activities in terms of timing will be implemented:

- During the engagement activities: short-term monitoring to allow for adjustments/improvements to be made during engagement; and
- Following completion of all engagement activities: review of outputs at the end of engagement to evaluate the effectiveness of the SEP as implemented.

**3. GRIEVANCE REDRESS MECHANISM (GRM)**

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

- In person: EALCRP PIU, 19 King George V St., Roseau
- Letter: Attention Project Manager, EALCRP PIU, 19 King George V St., Roseau
- Phone: 266 3998
- Email: [stephensonke@dominica.gov.dm](mailto:stephensonke@dominica.gov.dm) and [mikiemc20@gmail.com](mailto:mikiemc20@gmail.com)
- Anonymous: phone, email, letter, etc.

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

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