



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 03/13/2020 | Report No: ESRSC01166



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	7/31/2020	9/24/2020
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance	Ministry of Environment Climate Resilience, Disaster Management and Urban Renewal		

Proposed Development Objective(s)

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	3.65

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 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 and Trail Planning. This component would support updating and revision of 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. Project location(s) and salient characteristics relevant to the ES 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 Dominica 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 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

As the project will be implemented by the Minister of Agriculture and Fisheries through the already established project PIU currently implementing the Emergency Agricultural Livelihoods and Climate Resilience P166328 Project. The team has some familiarity with the World Bank procedures and processes. The social and environmental specialists have received training on the ESF and will continue to receive support during implementation. A project preparation grant (PPG) is in process and this will enable the hiring of consultants who will prepare the required instruments. Both of the current specialists have large work program under other projects, so the longer term to safeguards human resources in this project needs to be considered carefully during project preparation.

II. SCREENING OF POTENTIAL 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 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 currently 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 principle 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 properly 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

Public Disclosure



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. An Indigenous Peoples Plan which was prepared by the Implementing Agency under another WB project will be updated during the PPG period.

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 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 activities.

To assess and mitigate any negative environmental impact, the client will prepare and disclose a draft or final Environmental and Social Management Framework (ESMF), to describe the procedures to be followed for carrying out the environmental and social assessment. The ESMF will be inline with 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/ESIAs) 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 Borrower will also prepare and disclose (before project appraisal and as early as possible) a Stakeholder Engagement Plan (SEP), and an Indigenous Peoples Planning Framework (IPPF), based on culturally appropriate consultation guidelines and principles for ensuring meaningful participation of stakeholders.

In addition to these environmental and social risk management instruments, the Borrower will prepare and disclose an Environmental and Social Commitment Plan (ESCP) prior to appraisal which will be reviewed by the Bank. The ESCP will include all necessary measures that the project will need to address during preparation and implementation to comply with the ESF, as well as monitoring and reporting arrangements during project implementation.

Areas where “Use of Borrower Framework” is being considered:

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

ESS10 Stakeholder Engagement and Information Disclosure

The Borrower will undertake an in-depth stakeholder analysis during preparation to identify and assess project affected people, beneficiaries and other categories of stakeholders. It should include information on influence and perception of the project from each of the identified stakeholders. At this stage, major stakeholders include the community, environmental NGOs, the park management authority, relevant government officials, tour operators, environmental NGOs, civil society organizations etc. The Borrower will develop a Stakeholder Engagement Plan (SEP) to guide the process of engagement with stakeholders during project preparation and the life of the project. The SEP will assess stakeholders and project-affected parties. The SEP will include reference to the project IPPF for dedicated guidelines on consultation with indigenous stakeholders and will outline any specific measures to remove obstacles to participation and to allow the effective engagement of other disadvantaged or vulnerable groups. The stakeholders should have opportunity to comment on the project and their observations and opinions included in the overall project designs. The Borrower will propose and implement a Grievance Redress Mechanism (GRM) (with dedicated procedures for project workers) to receive and facilitate resolution of concerns and grievances, with socio-culturally appropriate and accessible mechanisms for IP and rural communities.

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

ESS2 is relevant for this project. It is not expected that workers from off island will be contracted or be involved in the trail rehabilitation 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 existing staff it is not expected that the Ministry will be involved in implementing works under this project. These works will likely include mostly non-skilled activities and no heavy machinery will be utilized. The borrower will develop a draft labor management procedure before project appraisal which will identify the type of workers to be contracted, and included provisions for ‘community workers’ should those be envisioned. The procedures will spell out how workers are contracted and provide details on basic occupational health and safety requirements, training, as well as providing for terms on working conditions, non-discrimination, and equal



opportunity for unskilled workers. The LMP will establish the minimum age for employment or engagement in connection with the project based on national law and ESS2, and will define measures to screen out engagement of children over the minimum age but under the age of 18 in project related activities that are hazardous or interfere with the child's education or that are harmful to the child's health or physical, mental, spiritual, moral or social development. The borrower will also develop and implement an Occupational Health and Safety Plan (OHSP) in line with the World Bank Group EHS Guidelines and will include specific Occupational Health and Safety (OHS) considerations in the ESMF to ensure health and safety of workers.

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.

ESS4 Community Health and Safety

This standard is relevant. As with all construction zones, however minor, it would be important that the work zones are restricted by fencing and other barriers to ensure that visitors and community members, particularly children, do not access the work zone. Once specific sites are known an ESMP will be developed which will include a small traffic management plan and pedestrian safety plan should be put in place to ensure that trucks unloading equipment do not unnecessarily cause traffic jams, and so equipment and supplies can be safely off-loaded. In addition, operational phase trail waste management and safety should be considered in the management plans given the mountainous terrain and need to provide proper fencing, railing, and signage regarding restrictions of use and procedures during bad weather events, and emergency situations such as fire or accidents. Signage that indicate protocols for respecting the communities that are around the trail and other tourist areas will be developed in partnership with those communities. The design of new buildings will be done with universal access design features and park management planning process will identify at least one suitable location for creating accessible nature experiences. Noise levels during construction must be kept to a tolerable level. During preparation, the need for security personnel will be assessed and if required, a Security Plan will be prepared and included as applicable in each ESMP.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

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. The details of this will not be known until project implementation, as such a draft Process Framework will be prepared before project approval.

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 precede 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 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. No proposed physical works are being considered that are located within the Kalinago territory however Component 3, will directly work with the Indigenous community to create a plan for Kalinago territory land use. This will require an indigenous People Plan for the project that is developed in close coordination and consultation with the Kalinago people. An Indigenous Peoples Framework (IPF) must be prepared before appraisal. This IPF will lay out how the cultural context will be understood, for example the Kalinago's priorities, the cultural heritage values across the 3 National Parks and the Trail, and indigenous knowledge on natural resources. The Stakeholder Engagement Plan will document the processes for ongoing meaningful engagement with the Kalinago and will show how during the project preparation period the Ministry has responded to concerns about the negative impacts of the projects, and identified the specific ways which the community wishes to engage and benefit from the project.

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. If appropriate, the ESMF will include a Cultural Heritage Management Plan that will be consulted with IP and other stakeholders identified as relevant and disclosed prior to appraisal.

Additionally, the ESMF will include 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 will 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.

B.3 Other Relevant Project Risks

There are not likely other project risks however that will be determined during appraisal.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
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OP 7.60 Projects in Disputed Areas	No
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III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?	No
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Financing Partners

None

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:

Public Disclosure



Prior to appraisal the borrower will prepare draft versions of the following documents that provide the necessary level of detail to inform stakeholder engagement and Bank decision-making and are key for understanding the project’s most relevant environmental and social risks and impacts:

- An Environmental and Social Management Framework (ESMF), including a project-level GRM that is socio-culturally appropriate and accessible to Indigenous and rural communities, a Labor Management Plan (LMP) with a dedicated GRM, and an Occupational Health and Safety Plan (OHSP).
- A Stakeholder Engagement Plan (SEP) with a dedicated GRM
- An Indigenous Peoples Planning Framework (IPPF)
- Environmental and Social Commitment Plan (ESCP), outlining Borrower commitments for project implementation for any known project intervention sites.
- A draft Process Framework will be prepared before project approval

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

The finalization and implementation of the ESMF, IPPF, SEP (with GRM), LMP (with GRM), PF and any necessary environmental and social capacity building measures;

A Cultural Heritage Plan to be prepared as needed;

Hiring of Environmental and Social Specialist to monitor risk and impacts

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

14-Aug-2020

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Ministry of Finance

Implementing Agency(ies)

Public Disclosure



Implementing Agency: Ministry of Environment Climate Resilience, Disaster Management and Urban Renewal

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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Practice Manager (ENR/Social)	Maria Gonzalez de Asis Recommended on 11-Mar-2020 at 21:13:2 EDT
Safeguards Advisor ESSA	Maria Da Cunha (SAESSA) Cleared on 13-Mar-2020 at 11:07:57 EDT