Dominica Geothermal Development Company Limited
Powering a New Generation...

Resettlement Action Plan (Updated)

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Resettlement Action Plan

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Acronyms and Abbreviations

Name	Description
AoI	Area of Influence
RAP	Resettlement Action Plan
CIA	Central Intelligence Agency
CLO	Community Liaison Officer
DGDC	Dominica Geothermal Development Company Limited
DOMLEC	Dominica Electricity Services Limited
DOWASCO	Dominica Water and Sewerage Company Limited
DSWMC	Dominica Solid Waste Management Corporation
EC	Eastern Caribbean Dollar
EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
EPC	Engineer, Procure and Construct
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GDP	Gross Domestic Product
GIS	Geographic Information Systems
GoCD	Government of the Commonwealth of Dominica
HSE	Health, Safety and Environment
IFC	International Finance Corporation
kW	Kilowatt
LRP	Livelihood Restoration Plan
MTPNP	Morne Trois Pitons National Park
MW	Mega Watt
NZ	New Zealand
PAP	Project Affected Person
PS	Performance Standard
ROW	Right of Way
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
ToR	Terms of Reference
USD	US Dollars
WB	World Bank
WBG	World Bank Group
WHO	World Health Organisation

1. INTRODUCTION

1.1 Background

This Resettlement Action Plan (RAP) was prepared by Dominica Geothermal Development Company (DGDC) for the Dominica Geothermal Power Plant Project, located in the Roseau Valley, Dominica. The RAP has been developed based on the previous RAP, including the census information it collected, using the information from the updated reinjection pipeline route. This RAP has been updated with additional data collected by Eclipse Inc. during consultations for an ESIA[1].

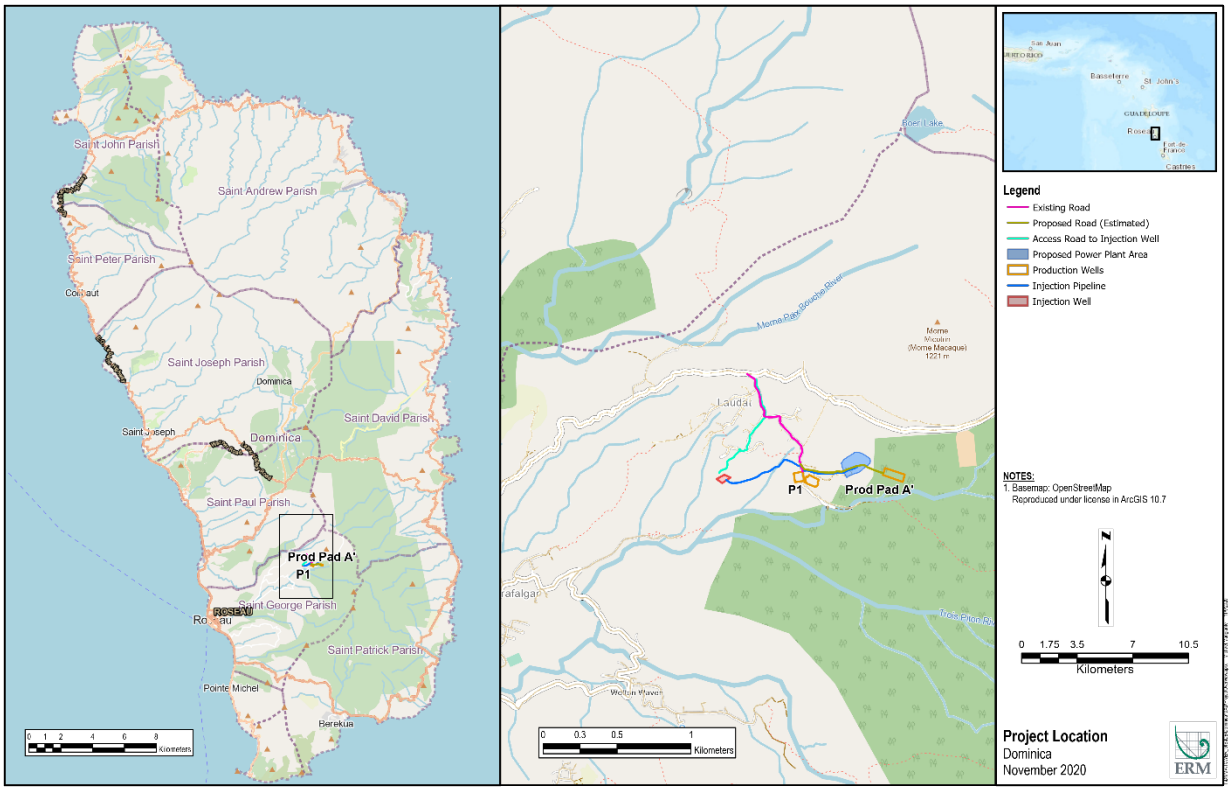
It is also important to note that, in September 2017, the Island was devastated by Hurricane Maria. This RAP has been developed post Hurricane Maria and reflects changes in land use, land acquisition and livelihood restoration for the Project post the disaster.

1.2 Project Location

The proposed Project is located in the Commonwealth of Dominica, a small island developing state in the Caribbean with a population of approximately 72,000 people and a land area of approximately 750 km^2. Dominica is located near the centre of a string of islands known as the Lesser Antilles, between the neighbouring French territories of Martinique and Guadeloupe. The proposed Project is located in the Roseau Valley in the Wotten Waven Geothermal System (Figure 1.1).

Within the Roseau Valley, a primary area of influence has been identified, comprising the three main communities in closest proximity to the proposed Project footprint. Due to their proximity, they are the most likely to affected by any employment, resettlement, community health and safety issues which arise from the Project. These communities of relevance are namely Trafalgar, Wotten Waven and Laudat, as shown in Figure 1.1.

[1] This version is based on the RAP included as Appendix B of the ESA addendum of February 2021. In the interest of precision, which does not alter the scope of impacts, but increases compensation entitlements, it includes a few minor text revisions and updates the RAP estimated budget.



Source: ERM, 2020

Figure 1-1: Location of Roseau Valley and Site of proposed

1.3 Project Components

The Project components will be located in four separate areas: Power Plant Site; Injection Area, Production Well Area, and the back-up Production Pad A. The Figure below depicts the location of these general areas as well as the access roads and the approximate location of the injection pipeline route.

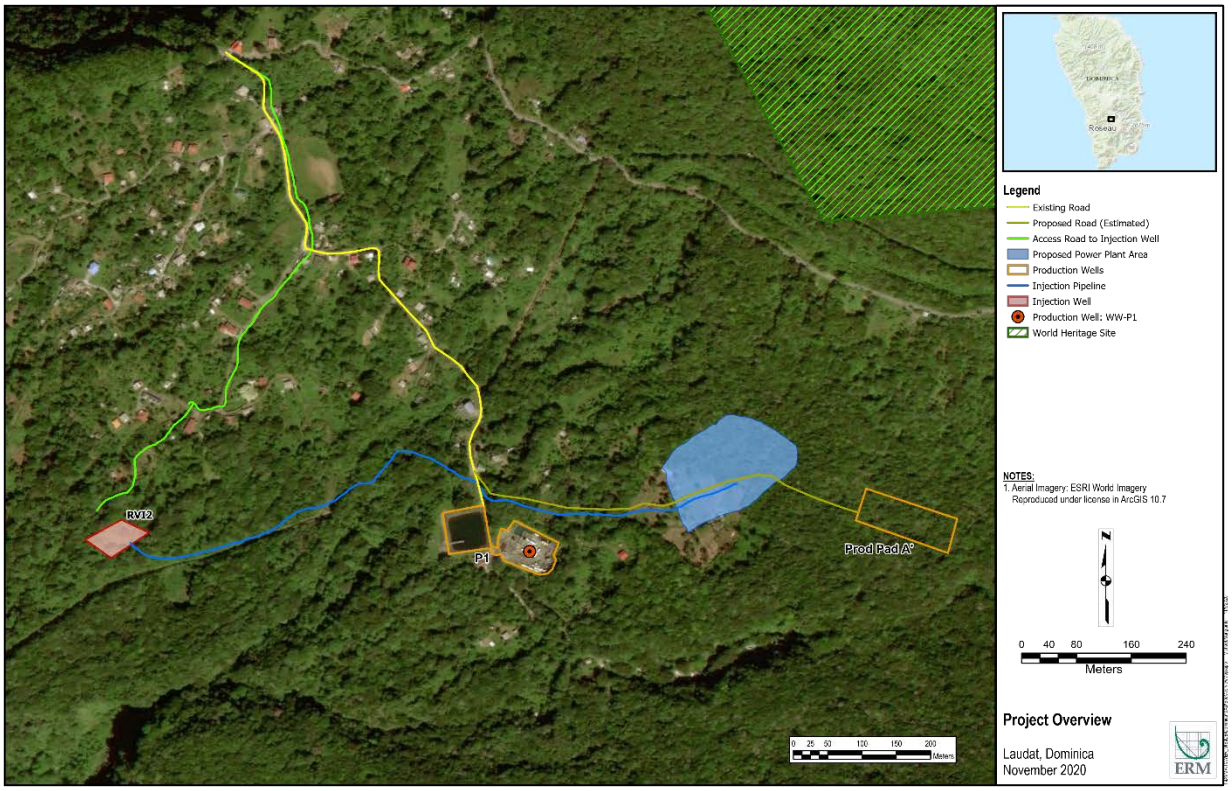


Figure 1-2: Project Component Location

The proposed geothermal facility will consist of the following main components, which are explained in more detail in the Addendum to the ESIA:

Plant Equipment:

- Production and Injection Wells;
- SGS and Brine Reinjection Pipeline and Wellpads;
- Turbine Generator;
- Heat Exchangers;
- Recuperators;
- Condensers;
- Pumps (feed, wells, ponds, firefighting system);
- Storage Tanks;
- Transformers;
- Emergency Generator;
- Water Tank and distribution system;
- Fire Fighting Tank and System;
- HVAC System; and

- Oil System;

Facilities:

- Brine Ponds;
- Electrical Building which will include separate areas for offices, kitchen and meeting rooms, workshop and storage, a control room, and a machinery room; and
- Septic Tank and Leach Field.

The Figure below shows a preliminary plant layout based on site topography and existing components locations for the binary plant.

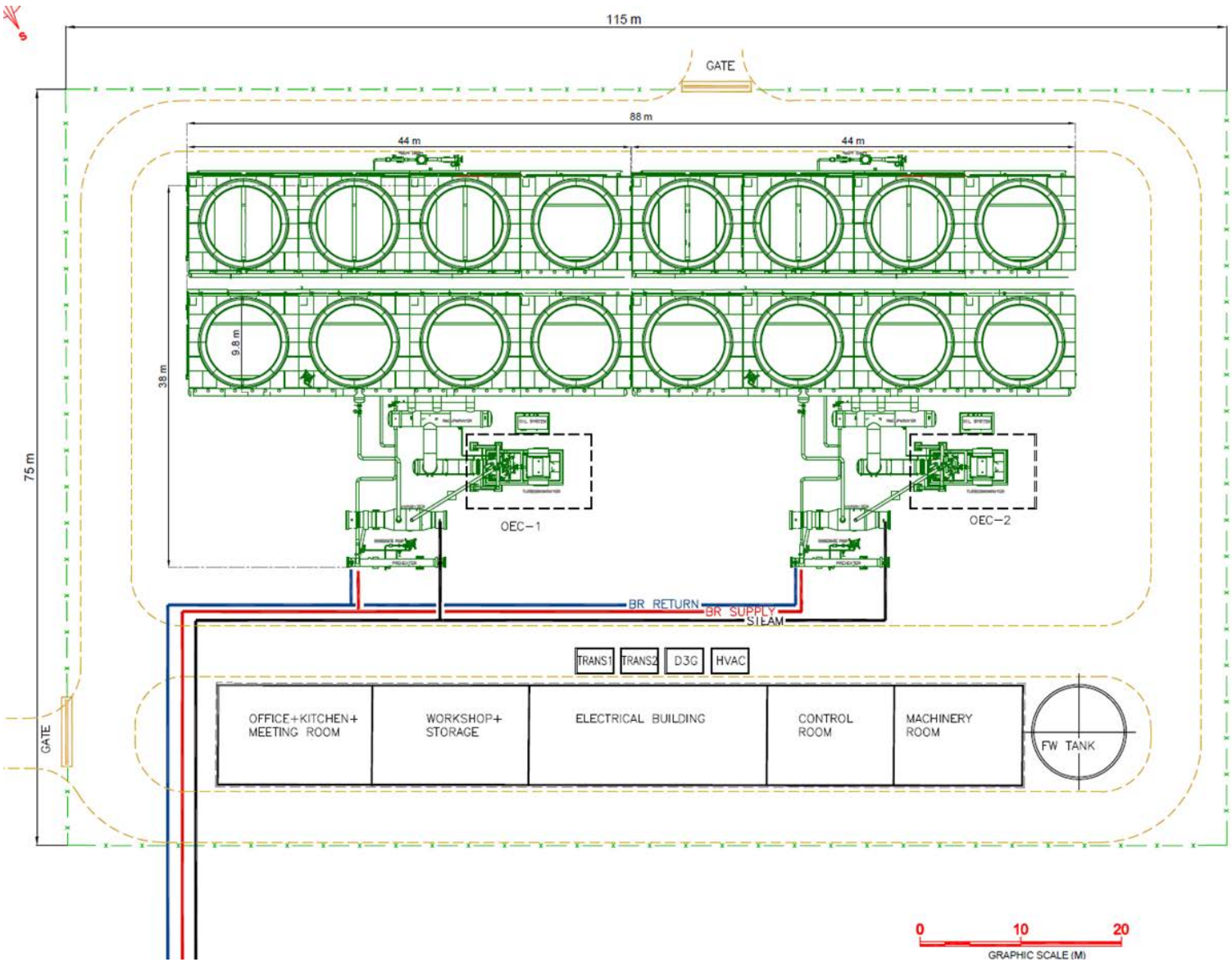


Figure 1-3: Proposed Preliminary Plant Layout

The Project comprises the development of a two-unit geothermal power plant with a gross capacity of 10 MW in the Roseau Valley, Dominica. This covers the following stages: construction, completion, testing, commissioning, ownership and operation including the steamfield, required electrical connections and integration with associated infrastructure. The power plant is proposed to be located close to the village of Laudat.

Land acquisition for the drilling phase of the Project is still being finalized. The Government has completed negotiations for ownership of the existing well pads (WW-01, WW-03 and R1). Negotiations for WW-02 are ongoing and are close to being complete. The power plant lands (one PAP, one parcel) have been acquired but no compensation has been paid and negotiations are ongoing and at an advanced stage. Lands surrounding the power plant site are still to be acquired. Any discrepancies between this RAP and the existing negotiated process including benefits and compensation will be in line with the RAP.

Brief descriptions of the main locations of Project infrastructure are as follows:

- Power plant comprising 2 x 5 MW units (Organic Rankine Cycle units (binary turbine), which will be adjacent to wells WW-P1 and WW03;
- Production well WW-P1 – The existing geothermal production well at Laudat is indicated to have potential to generate 6 to 9 MW and will be used together with WW-03(situated on same well pad) for the steam gathering;
- Reinjection well RVI2 (to be drilled) located in Laudat. The used geothermal fluid (brine and possibly some steam condensate) produced from production well WW-P1 & WW03 would be disposed of into reinjection wells RVI2 via a 250 to 300 mm diameter reinjection pipeline approximately 1.2 Km in length;
- Back-up production well RVP2 (to be drilled) in Laudat.
- Steamfield infrastructure including two phase piping, steam separator, atmospheric flash tank, brine collection and disposal system, condensate collection and disposal system, pressure relief system, storage sump and rock muffler;
- Supporting infrastructure including existing well pads, turbine building, primary and ancillary equipment, cooling system, workers camp, and water supply; and
- 11 kV interconnections to the DOMLEC electricity grid at the power plant site.

1.4 Efforts to Minimize Resettlement

1.4.1 Power Plant

Several power plant sites and reinjection pipeline route options were considered as part of the Project (refer to ESIA Volume 1: Introduction). Multiple sites were considered for the power plant once the geothermal resource was identified. The site was gradually moved south-east to increase the separation distance from the concentrated local population, in order to reduce noise impacts.

1.4.2 Reinjection Pipeline Route

In terms of the reinjection pipeline route, four options were considered. One proposed route through Laudat was ultimately rejected to avoid displacement/disruption and another route was rejected as it was scheduled to rely on DOMLEC infrastructure, which presented coordination challenges for the Project. The third option was rejected because it was considered technically too difficult due to topography e.g. steep ravines. Ultimately, the power plant site location and preferred reinjection pipeline route were chosen to avoid disruption to the community and in consideration of economic and technical constraints. It is also important to note that at this stage, there is still some flexibility in the exact footprint of the reinjection route pipeline. As the pipeline corridor is anticipated to only be 10 m (to allow for access, maintenance and flexibility around design), DGDC will still have some discretion

to locate each portion of the pipeline within an individual property. In other words, there are still opportunities to avoid displacement of structures, crops or other assets along the reinjection route line during this stage of design. The proposed length of the re-injection pipeline from the power plant to the reinjection site, is approximately 1.2 kilometers. The exact diameter has not yet been determined. It is located on the south-western periphery of the village of Laudat. The Figure below shows the updated reinjection pipeline route.

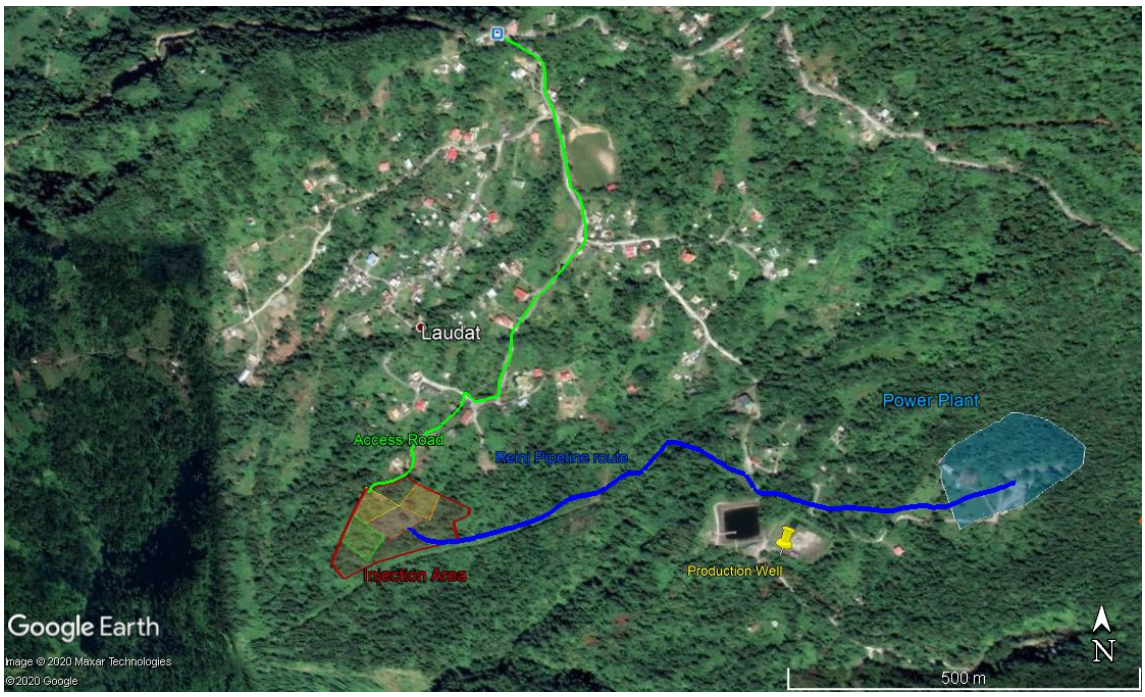


Figure 1-4: Proposed Pipeline Route

1.5 RAP Purpose, Scope and Approach

Development of the power plant site and reinjection route pipeline will result in the acquisition of 22 properties (mostly abandoned agricultural land)either partially or in their entirety, and as a result cause physical displacement of four residential structures and economic displacement of two farmers. Only one property is occupied by a one-person household. The other three structures are classified as residential, having been constructed for that purpose. One is an abandoned dwelling house, one a partly constructed abandoned house and the other one which could be converted into a home.According to OP 4.12, displaced persons may be classified as:

> "those who are affected by the involuntary taking of land resulting in (i) relocation or loss of shelter; (ii) loss of assets access to assets; or (iii) loss of income sources or means of livelihood whether or not the affected person must move to a different location."

World Bank & IFC resettlement policies recognize the need to provide resettlement, compensation, and / or livelihood restoration assistance to persons that are currently utilizing project-affected land. Thus, the displacement of residents and farmers from the site and reinjection route are addressed in this RAP.

The scope of the RAP process included the following steps:

- Establishing the legal and guidance framework for managing displacement impacts, including national and international requirements;
- Identification, consultation and socio-economic surveys with all of the PAPs;

- Socio-economic analysis, including establishing the extent of vulnerability of the PAPs;
- Inventory and valuation of properties, structures, and crop assets to establish the basis for associated compensation;
- Consultation with relevant parties to identify any potential alternative land of comparable productive value for relocation;
- Consultation with PAPs on potential options for resettlement site options, livelihood restoration, compensation or improvement measures. These may include, for example, assistance to diversify income generating activities (such as training in new skills), financial management training and credit opportunities, business and enterprise training; and
- Establishing the necessary steps for implementation including:
  - Confirming final compensation / implementation budget, including all financial compensation, and costs for land acquisition, loss of structures,), loss of crops, transitional support, livelihood restoration measures and independent monitoring;
  - Establishing the grievance and redress mechanism;
  - Confirming the roles and responsibilities within the GoCD and DGDC team regarding the implementation process; and
  - Confirming requirements for monitoring and evaluation.

1.6 Structure of the RAP

The content of this document is as follows:

- Section 1: Introduction;
- Section 2: Legal and Institutional Framework;
- Section 3: Socio-Economic Background of Affected Community and PAP Census;
- Section 4: Identification of Project Impacts;
- Section 5: Eligibility and Entitlements;
- Section 6: Valuation and Compensation;
- Section 7: Vulnerability Assistance
- Section 8: Stakeholder Engagement;
- Section 9: Resettlement Sites;
- Section 10: Roles and Responsibilities;
- Section 11: Grievance Management;
- Section 12: Monitoring and Evaluation;
- Section 13: Budget and Schedule; and
- Section 14: References.

2. LEGAL AND INSTITUTIONAL FRAMEWORK

2.1 Introduction

The Project is required to meet nationally and internationally accepted environmental and social safeguard standards in order to ensure that community benefits from the Project are maximised, and that potential adverse environmental and social impacts are minimised. Relevant national and international requirements are summarised below. In the event that international standards and national standards differ, the higher standard shall apply to the Project.

All lands for the project will be acquired and paid for by the GoCD and then be granted to the DGDC for use. A cooperation agreement (November 2019) between the Ministry of Lands and DGDC outlines the roles and responsibilities of each party with respect to lands.

2.2 National Requirements

There are a number of national policies, laws, regulations and guidelines that guide relevant environmental, social and economic issues in Dominica. The laws and regulations also provide the relevant instruments for the effective management of land acquisition and proper institutional coordination. Of primary relevance is the Land Acquisition Act.

The Land Acquisition Act, Chapter 53:02 deals with the acquisition of land by the state and clearly outlines procedures in acquiring private lands for state use. The Act covers the following areas:

i. Acquisition of land and abandonment of acquisition;

ii. Appointment and powers of Board of Assessment;

iii. Determination of Small Claims for Compensation;

iv. Provisions Governing Assessment of Compensation;

v. Miscellaneous:

   a) Absentee owners;

   b) Compensation to persons interested in adjacent land;

   c) Special provisions as to leases;

   d) Persons in possession to be deemed owners;

   e) Fees and expenses of Board;

   f) Conveyancing etc.;

   g) Payment of compensation;

   h) Exemption from stamp duty and fees;

   i) Limitation of time for making claims;

   j) Assaulting or obstructing officer; and

   k) Saving.

The Act includes a description of how compensation should be determined. The general process of compulsory land acquisition under the Land Acquisition Act, Chapter 53:02 is described below in Figure 2.1.

Compulsory land acquisition according to the Land Acquisition Act consists of an evaluation of the market value of the land conducted by the Department of Lands, a Cabinet paper establishing government acquisition of the land, follow by a negotiation or agreement to compensation with the relevant land owner. Compensation values are determined by the government Land Surveys Department.

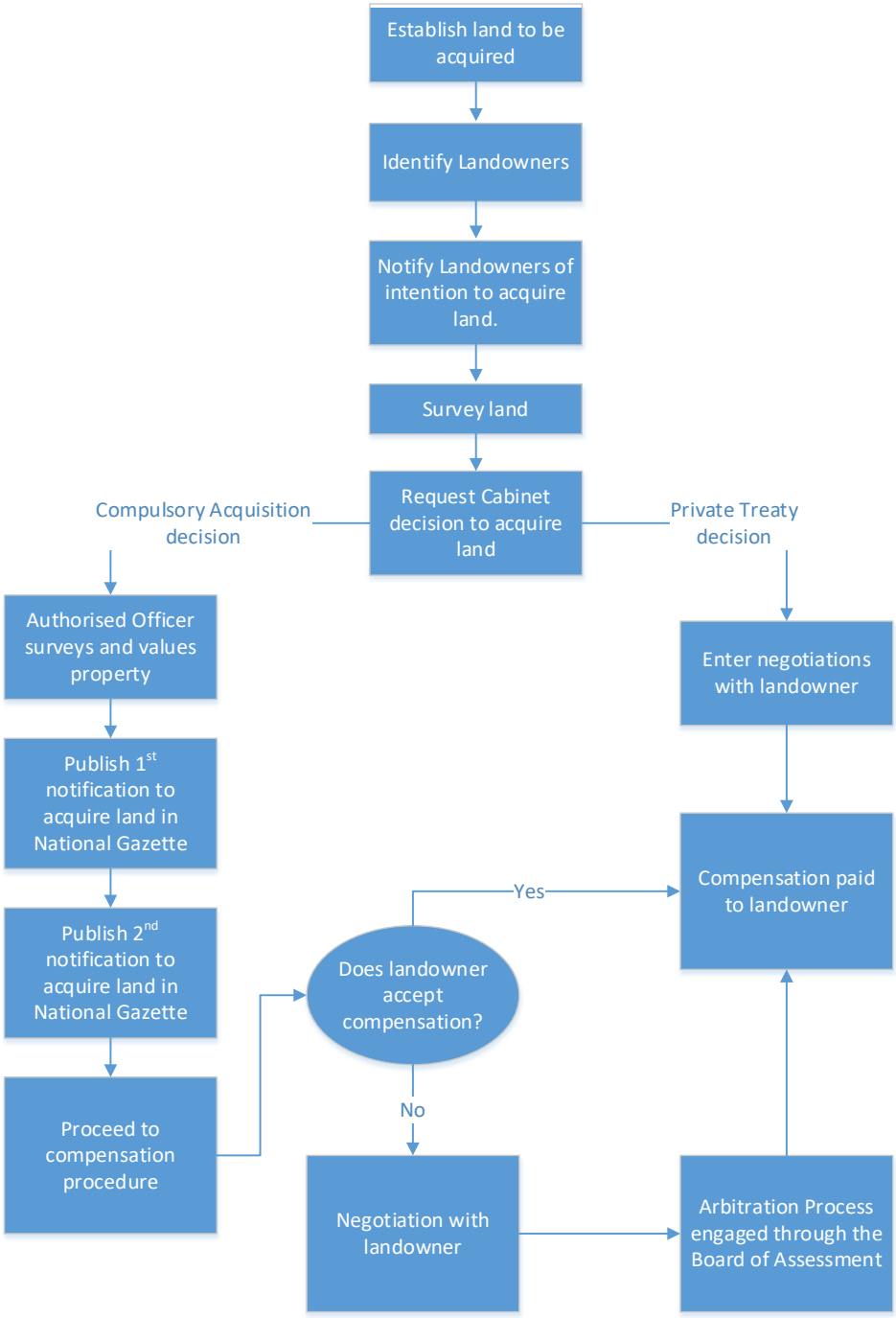


Figure 2-1: The General Process of Acquiring Land through Compulsory Acquisition in Dominica

This process differs from the World Bank land acquisition and resettlement requirements in that compensation under OP 4.12 requires the evaluation to cover full replacement cost for each party, rather than market value covered by national requirements. In addition, World Bank resettlement requirements consider compensation for land users without legal rights, support for vulnerable parties, and livelihood restoration measures that are not covered under national law. World Bank also requires that compensation be completed prior to Project construction and that consultation associated with this process be well documented. A gap analysis between National Law / Practice and World Bank requirements is show in Table 2.1.

Table 2-1: Policy GAP Analysis

Conflict/Gap	Local Legal Framework/Policy	World Bank Policy Requirements	Measures to Address Conflict/Gap
Compensation & Restoration of livelihoods and living standards	There is no existing legislation or official policy document that specifically supports resettlement initiatives in Dominica except for that created specifically in response to TS Erika and Hurricane Maria	OP 4.12 Involuntary Resettlement: Section 6 (c) – Where necessary……compensation should also include measures to ensure that displaced persons are offered support after displacement for a transition period, the time likely to be needed to restore their livelihood and standards of living. The displaced persons should also be provided with development assistance such as land preparation, credit facilities, training or job opportunities, in addition to the other compensation measures stipulated.	The Social and Environmental Safeguards of the World Bank take precedence. All PAPS should be eligible for compensation at full replacement cost for lost assets and assistance to support livelihood restoration per World Bank Policy OP 4.12 requirements
Support for displacement	World Bank type policy pertaining to the restoration of income sources and livelihoods, support after displacement for a transition period; do not apply except as has been developed in response to natural disasters	Section 2 (c) – Displaced persons should be assisted in their efforts to improve their livelihood and standards of living or at least to restore them in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.	The Social and Environmental Safeguards of the World Bank take precedence. All PAPS should be eligible for full compensation benefits per World Bank Policy requirements
Development assistance	The provision of elderly assistance, employment under the National Employment Programme; Free health services for Elderly and needs based social support are all available to qualifying PAPS	Section 2 (c) – Displaced persons should be assisted in their efforts to improve their livelihood and standards of living or at least to restore them in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.	The Social and Environmental Safeguards of the World Bank take precedence. All PAPS should be eligible for full compensation benefits per World Bank Policy requirements
Opportunity to derive development benefits from project	There is no existing legislation or official policy document that specifically supports resettlement initiatives in Dominica	Performance Standard 5, Section 9 – The client will also provide opportunities to displaced persons to derive appropriate development benefits from the project,	The project will create temporary job opportunities during the civil plant and pipeline construction While some of the jobs will require specialized skills that may not be available locally, for non-specialized jobs, the project is expected to create equal employment opportunity for both men and women. In that regard the DGDC will as far as possible ensure that service providers give priority to the employment of workers originating from the Roseau Valley Communities.
Timing for the Payment of Compensation and Taking possession of Land Acquired	The Land acquisition Act Chpt. 53:02 is silent on the timing for compensation payments Sections 3 and 5 permits for access to lands any time after the publication	OP 4.12 Possession of the land acquired and related assets only after compensation has been previously paid in full.	The Bank's policy will take precedence. Identification of land owners and tenants has already been done and notification to the authorized officer completed. MOUs between Ministries are pending to facilitate monitoring and reporting by the DGDC

2.3 Institutional Framework for Addressing Land Acquisition and Leases

The Department of Lands already has a process in place for addressing land acquisition and leases including any grievances associated with this process. As such, DGDC will work closely with the Department of Lands during the resettlement process for this Project to ensure consistent coordination.

The following are procedures covered by the Act are applicable to the land acquisition process required for the geothermal project:

- Preliminary notification and power to enter the land:
  - If the Commissioner of Lands (the Authorized Officer) determines that any land is required for public purpose and it is necessary to make a preliminary survey or other investigation of the land, he/she may cause the publication of notification to that effect; and thereafter it shall be lawful for the Authorized Officer or his/her agents to enter on to the land to undertake the investigative works required.
- Power to apply land to purposes of acquisition without waiting for formal vesting:
  - At any time after the publication of a notification of the intention to acquire land for public purpose, it appears to the Authorised Officer that this land should be acquired, he/she may make an immediate declaration to that effect; and it is lawful for him/her to direct the Authorized Officer to do any work on the land connected with the use for which the land is being acquired.
- Appointment of Board of Assessment:
  - In the event that the parties cannot reach agreement on compensation to be paid, a Board of Assessment may be appointed and granted full power to assess, award and apportion compensation in such cases, in accordance with the provisions of the Act.

Sections 3 of the Act permits access to the land for investigative purposes before compensation is paid; Section 5 allows the government to take possession of land acquired and to commence development before compensation is paid. These provisions are not consistent with the World Bank's policy on involuntary resettlement, which states that the client will take possession of land acquired and related assets only after compensation has been made available and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons in addition to compensation.

Given the commitment of the Government to comply with the Bank's policy, the DGDC has been delegated with the authority to act on behalf of the Ministry of Energy to provide support to the department. A Co-operation agreement to effect this was signed in November 2019 between Ministry of Lands and DGDC.

In relation to payments, though estimates have been provided to enable realistic budgetary allocation to be made for land acquisition in the national budget, if this is deficient, it will likely hinder the ability of the government to comply with the provision. Further, in cases where agreement over the payment of compensation cannot be reached between the Authorized Officer and the land owner, the appointment of a Board of Assessment would further delay payment. Experience has shown that negotiations for compensation (using either medium) can sometimes take several years to be concluded.

2.4 International Requirements

Relevant World Bank Group (WBG) requirements for this Project are contained in OP 4.12. According to the standard, resettlement is considered involuntary when affected individuals or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement which can occur when the buyer can resort to lawful expropriation when negotiated settlement fails. As stated earlier, as this Project can resort to expropriation or impose legal restrictions on land use through the Government of Dominica if negotiations fail, this Project triggers OP 4.12. OP 4.12 addresses land acquisition and involuntary resettlement. It recognises that land acquisition for projects and restrictions on land use can have adverse impacts on communities and people that presently use the land intended for a project.

2.4.1 OP 4.12- Involuntary Resettlement

According to OP 4.12, involuntary resettlement may cause severe long-term hardship, impoverishment, and environmental damage unless appropriate measures are carefully planned and carried out. For these reasons, the overall objectives of the Bank's policy on involuntary resettlement are the following:

- Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs.
- Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable the persons displaced by the project to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs.
- Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

OP 4.12 covers direct economic and social impacts that both result from Bank-assisted investment projects and are caused by:

- the involuntary taking of land resulting in relocation or loss of shelter;
  - loss of assets or access to assets; or
  - loss of income sources or means of livelihood, whether or not the affected persons must move to another location; or
  - the involuntary restriction of access to legally designated parks and protected areas resulting in adverse; and
- impacts on the livelihoods of the displaced persons.

2.4.2 IFC PS5

The International Finance Corporation’s Performance Standard 5 covers Land Acquisition and Involuntary Resettlement. Its requirements include:

- **Project Design**: consider feasible alternative designs to avoid or minimize displacement;
- **Compensation and Benefits for Displaced Persons**: when displacement cannot be avoided, offer displaced communities and persons compensation for loss of assets at full replacement cost and other assistance to help them improve or restore their standards of living or livelihoods;
- **Community Engagement:** engage with affected communities through stakeholder engagement;
- **Grievance Mechanism**: establish a grievance mechanism to receive and address specific concerns about compensation and relocation;

- **Resettlement and Livelihood Restoration Planning and Implementation**: where involuntary resettlement is unavoidable, a census will be carried out to collect appropriate socio-economic baseline data to identify the persons who will be displaced by the project, determine who will be eligible for compensation and assistance, and discourage ineligible persons from claiming benefits;
- In the case of physical displacement, the client will develop a **Resettlement Action Plan**; and
- In the case of economic displacement, the client will develop a **Livelihood Restoration Plan**.

PS5 also includes provisions for "Private Sector Responsibilities Under Government Managed Resettlement". It specifies that, where land acquisition and resettlement are the responsibility of the government, the client will collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with this Performance Standard. In addition, where government capacity is limited, the client will play an active role during resettlement planning, implementation, and monitoring.

2.4.3 IDB OP-710

The IDB's Operational Policy OP-710 covers Involuntary Resettlement. It sets out two fundamental principles:

1. Every effort will be made to avoid or minimize the need for involuntary resettlement.
2. When displacement is unavoidable, a resettlement plan must be prepared to ensure that the affected people receive fair and adequate compensation and rehabilitation.

The resettlement plans have to include compensation and rehabilitation that are deemed fair and adequate by ensuring that the resettled and host populations will: (i) achieve a minimum standard of living and access to land, natural resources, and services (such as potable water, sanitation, community infrastructure, land titling) at least equivalent to pre-resettlement levels; (ii) recover all losses caused by transitional hardships; (iii) experience as little disruption as possible to their social networks, opportunities for employment or production, and access to natural resources and public facilities; and (iv) have access to opportunities for social and economic development.

The following criteria applies to the design and appraisal of the Resettlement Plan:

- **Baseline Information.** Accurate baseline information must be compiled as early as possible. It will include information on the number of people to be resettled, and on their socio-economic and cultural characteristics, including disaggregation by gender. In addition, the data will provide an important basis for the definition of eligibility criteria, and compensation and rehabilitation requirements.
- **Community Participation.** The resettlement plan will include the results of consultations carried out in a timely and socio-culturally appropriate manner with a representative cross-section of the displaced and host communities. Consultations will take place during the design phase and will continue throughout the execution and monitoring of the plan, directly or through representative institutions and community organizations. Care will be taken to identify the most vulnerable subgroups and to ensure that their interests are adequately represented in this process.
- **Compensation and Rehabilitation Package.** Compensation and rehabilitation options must provide a fair replacement value for assets lost, and the necessary means to restore subsistence and income, to reconstruct the social networks that support production, services and mutual assistance, and to compensate for transitional hardships (such as crop losses, moving costs, interruption or loss of employment, lost income, among others). These measures must be taken in a timely manner to ensure that transitional hardships are not unnecessarily prolonged and do not result in irreparable harm. The options that are offered should be appropriate for the people affected and should reflect their capabilities and realistic aspirations. The compensation and rehabilitation package must take adequate account of intangible assets, especially non-monetary social and cultural assets and, particularly in the case of rural populations, of customary rights to land and

natural resources. Housing and service options, when included, will be appropriate for the social and cultural context and will, at the very least, meet minimum standards of shelter and access to basic services, regardless of conditions prior to resettlement. The design of compensation packages, as well as the community consultation and decision making mechanisms included in the resettlement program, will take into account the characteristics of the resettled population as identified in the disaggregated baseline data with respect to gender, ethnicity, age, and any other factors pointing to special needs and/or vulnerability.

- **Legal and Institutional Framework.** The resettlement plan must identify the legal and institutional context within which the compensation and rehabilitation measures have to be implemented. The first step in designing the compensation and rehabilitation package is to determine the entitlements of affected persons under applicable laws and regulations, to identify any services or social benefits to which they might have access, and to ensure that sufficient resources are available. The next step is to assess what additional measures are needed, if any, to restore the livelihoods of the affected population to the pre-resettlement standard, and to design mechanisms capable of delivering the goods or services that are needed, including effective and expeditious procedures for the resolution of disputes. This allows the compensation and rehabilitation package to work within the constraints of local laws and institutions, complementing them only as required, with project specific measures. This may lead to the identification of gaps in the local institutional and regulatory frameworks, that need not be incorporated into the resettlement plan, but which can eventually be addressed through institutional strengthening or other components if the borrower and the Bank so agree.
- **Environment**. Resettlement plans must take environmental considerations into account in order to prevent or mitigate any impacts that result from the development of infrastructure, densification of the host area, or pressure on natural resources and ecologically sensitive areas. An environmental impact assessment, including carrying capacity and socio-economic induced impacts on the host community, will be carried out for each proposed relocation site, wherever the magnitude of the resettlement component or the nature of the affected areas so requires, and the environmental management plan will be included in the resettlement plan.
- **Timeliness**. A preliminary resettlement plan must be prepared as part of the Environmental and Social Impact Assessment (EIA). It must undergo a process of meaningful consultation with the affected population, and must be available as part of the EIA, prior to the analysis mission. It must include sufficient information to be evaluated along with other project components. At a minimum, it must include: (i) evidence that appropriate measures have been taken to prevent new settlements in the area subject to resettlement; (ii) a tentative cut-off date for compensation eligibility; (iii) an estimate of the number of people to be resettled based on sufficiently reliable data; (iv) a definition of the various options to be made available under the compensation and rehabilitation package; (v) an estimate of the number of people that will be eligible for each option; (vi) a preliminary budget and schedule of execution; (vii) a diagnosis of the viability of the regulatory and institutional framework, identifying issues to be resolved; and (viii) evidence of consultation with the affected populations. The plan will be summarized in the Environmental and Social Impact Report (ESIR).
- The final plan must contain: (i) the definition of the final package of compensation and rehabilitation options; (ii) the eligibility criteria for each option; (iii) a reasonably accurate estimate of the number of people that will receive each option or combination; (iv) institutional arrangements and/or an execution mechanism that provides for the implementation of applicable local laws and regulations dealing with expropriation, rights to property, and the management of resettlement activities in a timely manner, assigns clear responsibilities for the execution of all elements of the resettlement plan, and provides for proper coordination with other project components; (v) the final budget funded within the overall project budget; (vi) a calendar for execution of activities required to provide the goods and services that comprise the compensation and rehabilitation package, linked to landmarks of the overall project so that relocation sites (or other services) are made available in a timely manner; (vii) provisions for consultation and involvement of local entities (public or private)

that can contribute to execution and assume responsibility for the operation and maintenance of programs and infrastructure; (viii) provisions for monitoring and evaluation, including funding, from the beginning of the execution period through the target date for achievement of full rehabilitation of the resettled communities; (ix) provision for participatory supervisory arrangements, which combined with monitoring, can be used as a warning system to identify and correct problems during execution; and (x) a mechanism for the settlement of disputes regarding land, compensation and any other aspects of the plan.

- **Monitoring and Evaluation**. The resettlement component of an operation must be fully and specifically covered in the reports on the progress of the overall project and included in the logical framework of the operation. The monitoring activities will focus on compliance with the resettlement plan in terms of the social and economic conditions achieved or maintained in the resettled and host communities. The plan and the loan agreement will specify the monitoring and evaluation requirements and their timing. Whenever possible, qualitative, and quantitative indicators will be included as benchmarks to evaluate those conditions at critical time intervals related to the progress of overall project execution. The final evaluation will be scheduled at a target date estimated for completion of the plan, defined as the date on which it is expected that the living standards the plan was designed to provide are achieved. In the case of global loans, the operational regulations will require Bank approval of the resettlement plan before a commitment is made to finance any subproject requiring resettlement. In all cases, independent supervision and multidisciplinary evaluation will be provided to the extent required by the complexity of the respective resettlement plan.

2.5 World Bank Group Supporting Guidance Documents

The following summarizes some key reference and supporting documents that have been referenced in development of this RAP:

- OP 4.12 - Involuntary Resettlement Policy;
- International Finance Corporation Environmental and Social Development Department – Handbook for Preparing a Resettlement Action Plan (2002);
- World Bank - Involuntary Resettlement Source Book (2004);
- IFC’s PS5; and
- IDB’s OP-710.

3. SOCIO-ECONOMIC BACKGROUND OF AFFECTED COMMUNITY AND PAP CENSUS

3.1 Regional and Local Socio-Economic Context

A socio-economic baseline study was carried out in 2017 as part of the ESIA for the Project. Further detailed surveys were completed as part of the RAP process in March-August 2018 to inform resettlement and livelihood restoration planning post Hurricane Maria. An additional socio-economic baseline study for the updated reinjection pipeline site was carried out in 2020. A summary of the PAP socio-economic census surveys conducted are presented below in Section 3.10.

3.2 Regional Overview

Dominica is a mountainous Caribbean island nation with natural hot springs and tropical rainforests. According to the Population and Housing Census of 2011, Dominica's population was 71,293 (Commonwealth of Dominica Central Statistical Office, 2011). Between 1991 and 2001, the population of the main townships of Dominica declined, including within the capital Roseau. The population of Dominica shows little increase in general, due to the exodus of people to other countries such as the more prosperous the United States, the United Kingdom and Canada.

In the Project vicinity, approximately 1,800 people live in the Roseau Valley, of which nearly 1,000 live in Trafalgar and Shawford, and the remaining in the hamlets of Wotten Waven/Casseau, Copthall, and Laudat. According to the 2011 census, the Roseau Valley gained 500 inhabitants between 2001 and 2011, i.e. a substantial increase of 32% (Commonwealth of Dominica Central Statistical Office, 2011). According to the Central Statistical Office, average household size in the Roseau Valley is 2.7. The breakdown of population by gender shows that Dominica consists of slightly higher men than women, national averages 49% females and 51% males.

3.3 Hurricane Maria 2017

In September 2017, Hurricane Maria hit Dominica with catastrophic effect. The economy came to a halt. Roads, bridges, and public utility systems were destroyed. The agriculture sector was devastated, with 100 percent loss of crops and substantial destruction to trees and livestock, which disproportionally affected the most vulnerable segments of Dominica's population. Other key sectors, including tourism, sustained substantial losses, with all hotels reporting serious damages and room availability down to near half of pre-storm levels. The rainforests, the main tourist attraction, were destroyed. Public services and transport activities were severely hampered. Most secondary roads, critical to access arable land and transport labour and agricultural products to markets and ports, were left inaccessible. Surveys in the Project affected communities suggest that 90% of the respondents have lost the roofs of their houses, and 95% of the respondents have lost their livelihoods.[2]

Based upon an initial assessment of impacts to each affected sector by the World Bank, Hurricane Maria resulted in total damages of EC$2.51 billion (US$930.9 million) and losses of EC$1.03 billion (US$380.2 million), which amounts to 224 percent of 2016 gross domestic product (GDP). Most damages were sustained in the housing sector (38 percent), followed by the transport (20 percent) and education sectors (8 percent). The greatest economic losses were sustained in the agriculture sector (32 percent), followed by the tourism (19 percent) and transport sector (14 percent).[3]

3.4 Socio-Economic Area of Influence

Within the Roseau Valley, three main communities of Trafalgar, Wotten Waven and Laudat were considered as the primary socio-economic area of influence (AoI) because they were in closest

[2] WBG Post-Disaster Needs Assessment, Hurricane Maria, September 18, 2017 completed November 7, 2017.

[3] WBG Post-Disaster Needs Assessment, Hurricane Maria, September 18, 2017 completed November 7, 2017.

proximity to the proposed Project and represent the main communities that would be likely to be impacted by any employment, resettlement, community health and safety issues. All of these fall within the Roseau Valley and data from the Roseau Valley itself is utilised where appropriate and when more detailed data for each community is not available. Figure 1.1 above shows the location of Trafalgar, Wotten Waven and Laudat**.**

Notwithstanding the changes to the project in 2019/2020 requiring the drilling of a new reinjection well in Laudat, the three communities remain the most likely to be affected, with more direct impact in Laudat.

3.4.1 Trafalgar

Trafalgar is located in the eastern portion of the Roseau Valley. The bulk of the population (959) in the valley reside in this area and it includes the most residentially developed of the three affected areas in the AoI. The area is characterised by brightly coloured concrete houses and includes a health centre and a primary school. At the bottom of the valley, the Trafalgar area is used for agriculture including vegetables, herbs and fruit orchards. Trafalgar Falls is also a tourist destination. The community is located almost directly below the project's reinjection area.

3.4.2 Wotten Waven

Wotten Waven is well known for its natural hot sulphur springs and is located in a steep, inaccessible area. The wider area surrounding Wotten Waven area is characterised by agriculture including vegetables, herbs and fruit orchards. The area also includes some residences (population is 313), a health centre and a primary school. Since the 1990s there has been a considerable development in tourism services in the Roseau Valley. This is centred on hiking and the hot sulphur water spas in Wotten Waven.

3.4.3 Laudat

Laudat is a small village nestled between three mountains: Morne Watt, Morne Micotrine, and Morne Trois Pitons. Laudat contains a sector of rainforest where numerous trees are felled for economic development. Laudat also includes a small population of 321 and is served by a health centre. The Morne Trois Pitons National Park, Freshwater and Boeri Lakes and Segment 4 of the Waitukubuli National Trail are all in the greater Laudat area. All project infrastructure is located or will be located in Laudat.

3.5 Economic Profile

Gross Domestic Product (GDP) in Dominica estimated in 2016 was US$812 million according to the CIA World Factbook. The economy in Dominica used to be primarily driven by agriculture but has recently shifted towards tourism as the Government increasingly promotes Dominica as a tourist destination. The income of the residents of Trafalgar, Wotten Waven and Laudat was primarily derived from agriculture, which comprised family-based farming for both local consumption and commercial purposes, and tourism. Most of the Roseau Valley residents had several jobs, including employment in the town of Roseau. However, since Hurricane Maria the World Bank has estimated that economic damages and losses amount to approximately US$1.37 billion or 226 percent of 2016 GDP.[3] Agriculture, livestock, fisheries and tourism show the steepest declines. Tourism income has further declined in 2019/20 with a reduction in cruise calls, closure of borders during traditional summer months, cancellation of festivals and strict quarantine requirements for visitors due to the COVID-19 pandemic.

In 2016 according to the CIA World Factbook, the average unemployment rate in Dominica was about 23%. Now post Hurricane-Maria, the Post Disaster Report stated that a "significant" proportion of the labour force is unemployed. The report does not quantify what is considered "significant". However, it

could be assumed that the unemployment rate post Hurricane Maria, is greater than 23% and the livelihoods of its population were likely altered as a result.

3.5.1 Agriculture

Agriculture general accounts for about 20% of GDP in Dominica and employs about 40% of the labour force. As of late 2017 pre-Hurricane Maria, there were about 2,000 hectares (4,900 acres) of land being used as pasture land for animal husbandry, comprising 2.7% of the total land area. In addition to tourism, residents of the Roseau Valley were engaged in crop cultivation and agroforestry. Many properties in the study area included the growth of citrus, other fruits, vegetables, and some root crops for consumption and for sale.

Agriculture is the second highest income-earner for the Roseau Valley's residents after tourism. However, from 2017 farmers were increasingly turning towards tourism which was considered more profitable.

Some villages in the valley were involved in commercial farming:

- Morne Prosper: mainly vegetables (the land is relatively flat).
- Wotten Waven: more diverse production of flowers, subsistence farming, tubers.
- Trafalgar: smaller-scale production more geared to tourism as well as tubers and 2 small poultry farms.
- Laudat: tuber production, vegetables and subsistence farming and a poultry farm.

In 2016 it was reported that there was a reduction in agriculture in most villages, especially Laudat and Trafalgar due to growth in tourism. In 2016, in the Roseau Valley, those working in agriculture are mainly women (in vegetable farming in Morne Prosper and Wotten Waven). Most farms were small production units comprising short-term and small-scale operations (¼ - 1 acre, or 1,000 – 4,000 m2). Few farmers had larger lots of land, i.e. in excess of 5 acres, or just over 20,000 m2.

Hurricane Maria caused substantial damage to agriculture in Dominica, including loss and damages to animals, crops, buildings, infrastructure and equipment. Damage to forest resources was also reported, with further impacts to agriculture. The greatest economic sector losses were sustained in the agriculture sector (32 percent), followed by the tourism (19 percent) and transport sectors (14 percent).4 It is probable that income from agriculture in the Roseau Valley has been significantly impacted.

The trend has changed slightly in 2020 given the reduction on tourism activities and there is a return to farming. The Ministry of Blue & Green Economy, Agriculture and National Food Security has launched initiatives including a WB funded "backyard" farming initiative in a bid to increase food security.

Unpublished statistics from the Ministry indicate that forty households from Laudat with a mean backyard size of 5900 square foot have participated.

3.6 Educational Profile

National school enrolment rates are quite high in Dominica at 97.5% for 5-9 year olds and 98.3% for 10-14 year olds (The Caribbean Development Bank, 2010). According to the Ministry of Education, in 2014, 75 pupils from the Roseau Valley were attending primary school. In July 2017, the Laudat and Trafalgar Primary schools were merged given the low number of students at Laudat. Approximately 224 students from the Roseau Valley were in Secondary School in 2014. Every village in the Roseau Valley has its own primary school, but pupils must travel to Roseau once they reach secondary school age. This can represent a significant cost for parents, especially for transport.

3.7 Health Profile

Life expectancy in Dominica is 77 years (81 for women and 74 for men). The death rate in Dominica is relatively low, 8.1-9.5 per 1000 live births between 2010 and 2015. The infant mortality rate was 20.8

per 1000 live births in 2015. According to 2017 data from the Ministry of Health, 5.5-6% of births in the country were born to residents of the Roseau Valley in 2015-2016. Chronic illnesses recorded in the Roseau Valley in 2015 included cancer, pneumonia, pregnancy related illness, hypertension, heart disease, motor neuron disease, birth defect, and diseases of the urinary system. Incidences of each were between 1-2 people. Malaria is not typically present in Dominica, but Chikungunya and Dengue fever are health concerns. At least 30 cases of Zika virus were confirmed in Dominica in 2016. According to the CIA Factbook, in 2014 5.5% of GDP was spent on health (Central Intelligence Agency World Factbook Website (2017).

There are three health centres in the Roseau Valley one in each of the potentially affected communities (Trafalgar, Wotten Waven and Laudat). The Valley is also close to the capital of Roseau and its health facilities including the Princess Margaret Hospital, which is the country's top health care establishment. The hospital has 224 beds (including 56 in a psychiatric unit) and was recently expanded per the Caraïbes Environnement Développement & Coll, May 2015 Report on the initial environmental status of the Roseau Valley in Dominica.

Damage and losses to healthcare facilities post Maria were estimated at EC$ 48.3M (US$ 17.85M). The Princess Margaret Hospital(PMH), Roseau, the only referral hospital in the health care system, sustained severe damage with 15 percent of its buildings totally destroyed leaving only 53 percent functional. Central medical stores lost the majority of medical supplies due to water damage but most medications were spared. Bed capacity was decreased by 95 beds.

In September 2019, the first phase of the Dominica China Friendship hospital (which is to replace the PMH), encompassing A&E, surgical and dialysis care was commissioned. The facility is scheduled to be completed in Q3 2021. An additional 40,000 square feet two-floor hospital with a 75-bed capacity, as well as a wide range of essential services and modern state-of-the-art facilities is under construction in Marigot to serve the North-East of the island. Services to be provided by the New Marigot Hospital will include Ambulatory Services, Emergency Care, Intensive Care (ICU), Maternity and Paediatric Care, Laboratory and Radiology Services and Trauma Centre.

With regard to the COVID-19 pandemic, Dominica has lifted stay at home orders, and resumed some transportation options and business operations (US Department of State). In June 2020, the government stated that it would not be extending the state of emergency and the curfew that had been in place to curb the spread of COVID-19.[4] The Center for Disease Control and Prevention states that Dominica's COVID-19 risk is moderate, with some increases of cases in the past 14 days. As of October 22, 2020, Dominica had reported a total 37 cases of COVID-19 since the beginning of the pandemic, with 29 recovered cases, 8 active cases and 0 deaths (Dominica Ministry of Health, Wellness and New Health Investment Response to COVID-19).

3.8 Gender

The Dominica Country Gender Assessment (CGA), commissioned by the Caribbean Development Bank (CDB) in 2014, provides a gender analysis of the economic, social and governance sectors in Dominica. The CGA indicates that Dominica's gender inequality index, which measures three aspects of gender inequality – reproductive health, empowerment, and economic activity – has not been calculated by the United Nations Development Programme (UNDP), because of the unavailability of relevant country data.

In terms of legislation, Dominica has neither signed nor ratified the Protocol to the Convention on the Elimination of All Forms of Discrimination against Women (Gender Equality Observatory for Latin America and the Caribbean). The most recent legislation with regard to gender equality has been the Protection against Domestic Violence Act, in 2001 and amendments to the Sexual Offences Act in 1998 and 1992. The law does not prohibit sexual harassment. Civil society groups reported it was a pervasive

[4] CARICOM, Dominica Lifts Curfew, State of Emergency (June 2020) accessed at: https://today.caricom.org/2020/06/30/dominica-lifts-curfew-state-of-emergency/

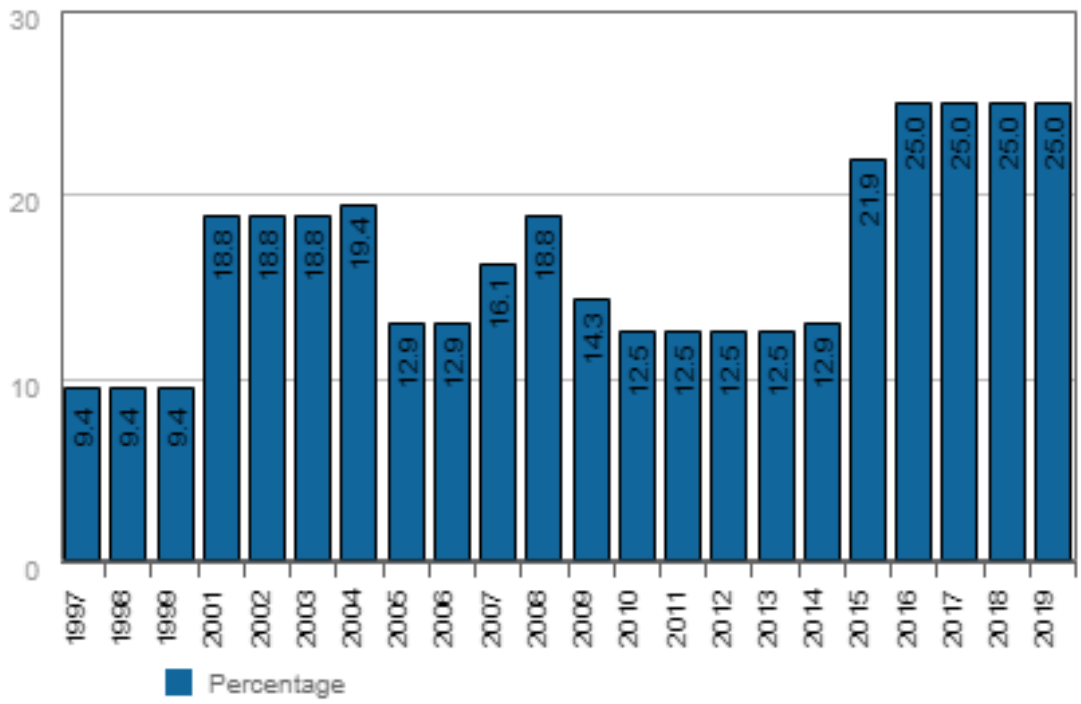
problem (US State Department Human Rights Report for Dominica, 2019). With regard to domestic violence, the most recent data reports that two women died from domestic violence at the hands of their partners in 2015, one died in 2014 and one died in 2009 (Gender Equality Observatory for Latin America and the Caribbean). In 2010, there were 177 cases of reported child abuse against girls, vs 39 against boys (CGA). The Bureau of Gender Affairs did not disaggregate reported cases of gender-based violence, but there were 391 reports between 2011 and 2013 (CGA).

The US State Department Human Rights Report for Dominica, 2019 states that: “The law criminalizes rape of men and women, including spousal rape. Although the maximum sentence for sexual molestation (rape or incest) is 25 years’ imprisonment, the usual sentence in 2019 was five to seven years. Whenever possible, female police officers handled rape cases involving female victims. Women were reluctant to report domestic violence to police. The only shelter for victims of gender-based violence remained closed after suffering damage during Hurricane Maria in 2017. Civil society reported that sexual and domestic violence was common. The government recognized it as a problem, but according to civil society groups, recognition of gender-based violence, particularly domestic violence, as a problem was low among the general population. Although no specific laws criminalize spousal abuse, spouses can bring battery charges against their partner.”

With regard to teen pregnancies, it has increased in recent years, going from 17.5% in 1981 to 40.3% in 2009 (Gender Equality Observatory for Latin America and the Caribbean and CGA). This represents a significantly high incidence of teenage pregnancy. Data from the Gender Equality Observatory for Latin America and the Caribbean shows that 100% of births in Dominica are attended by skilled health personnel. The country’s maternal mortality rate of 222.3 per 100,000 women (2010) represents a high rate, placing Dominica at 53rd in the global ranking (CGA).

In terms of education, secondary school enrolment for 2011/2012 was slightly higher for males (50.7% for males vs 49.3% for females) but the number of women in tertiary level education is significantly higher than the number of males (62.5% vs 37.5%) (CGA). For labor participation, 58.4% of the labor force in 2011 was composed of males and 41.6% of females; however, the unemployment rate in 2011 was slightly higher for males than females, standing at 12.3% vs 9.9% (CGA).

When it comes to autonomy in decision-making and women’s participation in government, Dominica exhibits male dominance in Parliament, with a male: female ratio of 87.5%: 12.5% in 2014 (CGA). For 2013, the number of male vs female village councilors was 59% vs 41%, and the number of male vs female chairpersons of village councils was 71% vs 29% (CGA). The number of women legislators are illustrated in the Figure below for the years 1997-2019 (Gender Equality Observatory for Latin America and the Caribbean).



Source: Gender Equality Observatory for Latin America and the Caribbean

Figure 3-1: Number of Women Legislators (Percentage)

3.9 Vulnerability

In 2018 the social survey respondents, focus groups and wider community expressed that there were no specific vulnerable groups in the Roseau Valley. However, during project consultation, disabled members of the community were identified, including a blind member of household and elderly PAP who were without support services. Disabled members of the community would be considered vulnerable. Elderly members of the community that could be isolated and widows would also be considered vulnerable. In addition, residents of the Roseau Valley that have been unemployed for a significant length of time (2 years or more) could also be considered vulnerable.

Post Hurricane Maria and due to loss of income due to COVID-19, new vulnerable groups emerged. Surveys in the project affected communities suggest that 90% of the respondents had lost the roofs of their houses, and 95% of the respondents lost their livelihoods[5]. Rebuilding and government housing assistance programmes have alleviated this hardship in most communities including Laudat. Among the non- salaried economically active population, 3.1 million workdays were lost post-Maria. The respective loss in work days and income resulting from Hurricane Maria, is likely to have resulted in a 25 percent decline in consumption, which could translate into an increased poverty rate of 36.2 percent (from 28.9% as reported in 2009).

No PAPs indicated loss of income from COVID-19 but indicated psychological impact due to social protocols.

[5] WBG Post-Disaster Needs Assessment, Hurricane Maria, September 18, 2017 completed November 7, 2017.

3.10 Detailed Socio-Economic Surveys

Initial face-to-face interviews and phone discussions were held in March 2018 with the PAPs to collect census level information and verify physical assets. Face-to-face interviews included completion of a census survey questionnaire and phone interviews, which were conducted to collect more limited data, consisted of approximately ten basic questions. Given the change in project scope and reinjection line PAPs, additional surveys were conducted during August-November 2020. All but two of the parties chose to complete the full census survey. Additional census data was collected during June and July of 2018 and again during August -November 2020 to get a complete picture of PAP socio-economic conditions. Findings relating to the PAPs are summarized below. Photographs of the PAPs properties and some additional data is provided in Appendix B.

It is important to note that certain circumstances, particularly cultural reticence to share income and livelihood information, may have influenced the responses to the socio-economic surveys.

Survey responses directly relevant to the RAP process are summarised as follows:

- A total of approximately 56 individuals (21 landowners and their households) were identified when all members of the affected PAP households were tallied. One PAP represents two properties.
- Only one of the PAPs currently resides in one of the four identified structures.
- The surveyed PAPs were generally aged 50 to 60+. Two of the PAPs are elderly. Approximately half are single and a half married. Half are women and half men. Households generally consist of 3-4 people.
- Two of the PAPs are supporting elderly parents and approximately half of the PAPs are also supporting teenage or older children and siblings.
- Five of the PAPs presently live overseas, some did not fill in the survey in full and provided limited information. Some own other land or property in the area. Some were farmers, vendors or small business traders, a [redacted] stay at home parents, unemployed or construction workers.
- Most of the PAPs experienced some adverse effects from Hurricane Maria including structural damage, income loss, or had the need for government food rations.
- Most of the PAPs are elementary school graduates, some have high school degrees and four have college degrees. All own their respective properties or are representatives of persons owning their properties
- Average household monthly income is approximately $EC 3,000 (approximately USD 1100-). Many of the PAPs indicated that they are supporting other family members. Most of the PAPs have other working members in their households, which may reduce their vulnerability. Most of the PAPs indicated that they are responsible for spending of household finances.
- All of the PAPs are aware of the proposed Project and none have expressed opposition to it or acquisition of their property if compensation is fair.

The following Table presents additional data on the PAPs and is complemented by the entitlement matrix in Table 5.1.

Table 3-1: PAP Socioeconomic Census Data

Number	Type of Business	Gender	Age	Primary Occupation	Marital Status	Duration of Business	Household Members	Highest level of education
PAP1	Farming (Structure which could be used as a residence on land)	Male	54	Self-employed farmer	Married	5 years	4	Secondary School
PAP2	Construction (abandoned partly constructed residential structure on land)	Male	74	Construction (living and working in the U.S.)	Married	7 years	5	College
PAP3	Farming and Construction (residential structure, crops)	Male	62	Agriculture/Construction	Single	31 years	1	Primary School
PAP4	Homemaker (abandoned residential structure 5+ years)	Female	49	Homemaker (Living in Germany)	Single	20	5	College
PAP5	[redacted]	Female	56	[redacted]	Single	19	4	Post-graduate, Masters Level
PAP6	N/A	Male	48	Living & Working in French Territories	Married	Unknown	4	Vocational Certificate
PAP7	Contractor	Male	50	Contractor	Married	N/A	7	Elementary
PAP8	Tourism – out of business- In Liquidation (drill pad)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PAP9	Businessperson (drill pad)	Female	N/A	Businessperson	Married	N/A	N/A	Post-Secondary
PAP10	Retired Vendor/Subsistence Farmer	Male	61	Subsistence farmer	Single	45	4	Primary
PAP11(001)	Businessperson	M	42	Businessperson	Single	N/A	3	Secondary
PAP12(002)	Businessperson	F	65	Businessperson	Divorced	10	3	Tertiary
PAP13(003)	[redacted]	F	62	[redacted]	married	44	3	Tertiary
PAP14(004)	No response	N/A	N/A	No contact info available lives overseas	N/A	N/A	N/A	N/A
PAP15(005)*	No response	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PAP16(006)	Retired	F	64	Retired	Married	10	4	Primary
PAP17(007)	Retired	M	87	Retired	Widowed	10+	2	Primary
PAP18(008)	N/A Company	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PAP19(009)	Lawyer	F	49	Property Manager	Single	12	1	Tertiary

[redacted]

PAP20(010)**	Unemployed	F	60+	Unemployed	Single	N/A	3	N/A	[redacted]
PAP21(011)	Retired (subsistence farming)	F	60+	Retired	Married	N/A	3	N/A	[redacted]

Landowner recently deceased – heirs refused to respond* *- two parcels of land*

4. IDENTIFICATION OF PROJECT IMPACTS

4.1 Land Acquisition, Physical Displacement and Resettlement Impacts

For construction of the power plant, reinjection route and associated infrastructure, seven full properties at the power plant, four full properties for the reinjection pad (RVI2), a portion of eight other properties along the reinjection line, and a portion of one property for production pad A (RVP2) would need to be acquired. This would include three structures, one of which is classified as residential, one intended for residential use and one used for livestock (refer to Section 6 for further details). Only one structure is currently housing a PAP. These properties would be directly displaced by the Project footprint. This RAP therefore considers 22 properties in total since it includes two legacy properties still to be acquired. It is important to note that two of the properties are owned by the same PAP, so there are only 21 PAPs, listed in the table 3.1. in page 24.

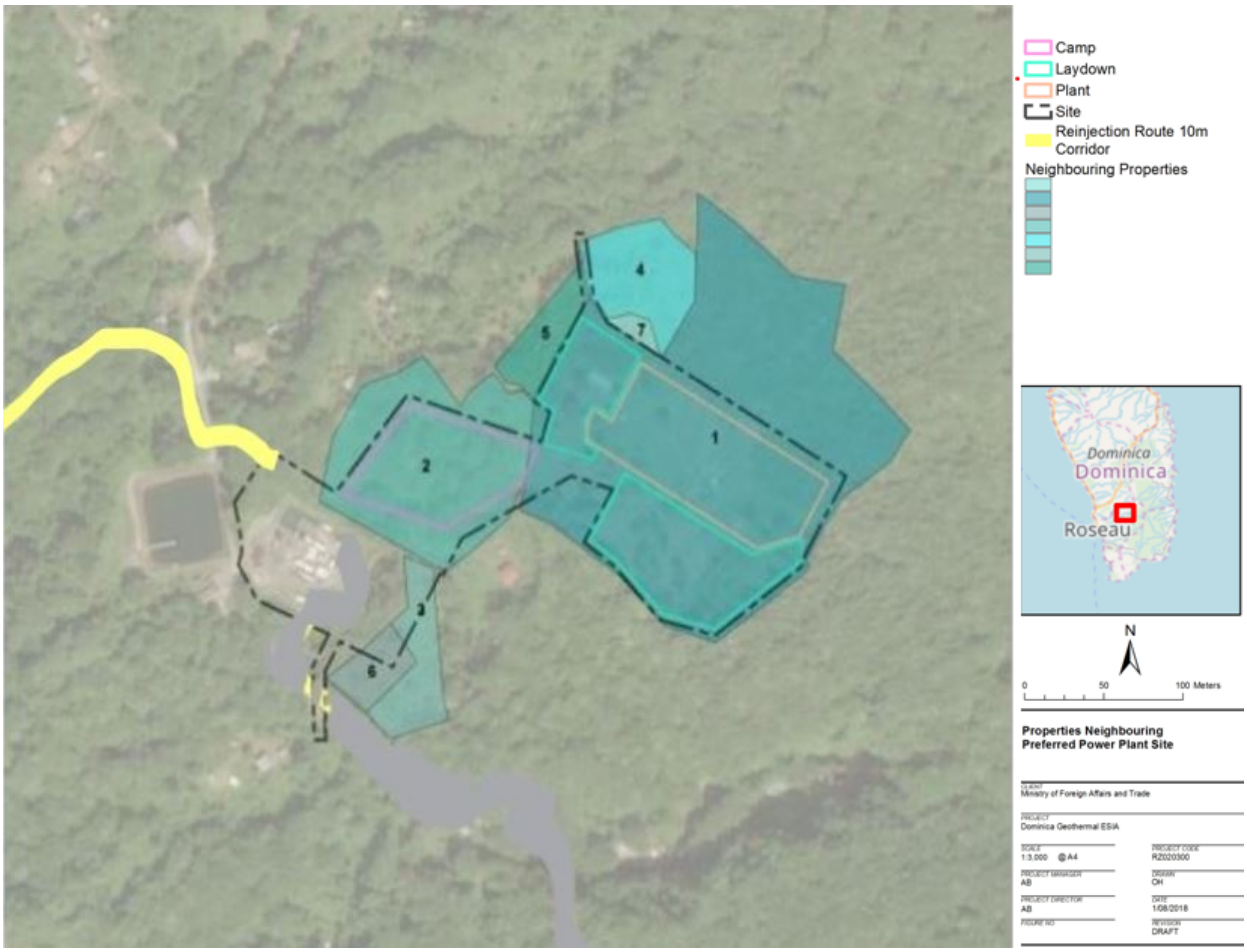
Of the twelve properties impacted by the construction of the reinjection route and drilling of the reinjection well, eight would only require acquisition of a portion of the property to accommodate a 10 m wide corridor. Table 4.1 below illustrates the acreage and percentage of each property required for acquisition for the reinjection line route, where the average plot size is approximately one acre. As the percentages required for each property are generally small, there is still an opportunity to minimize resettlement/livelihood impacts during the design phase by placing the reinjection line route in the areas of least impact within each property, or to avoid dividing a piece of land in two. The Table below presents the estimated amount of land to be acquired for the reinjection line, per PAP. Where the land is untitled, the acreage required is given.

Table 4-1: Estimated % of Land Acquired for Reinjection Line Route

Reinjection Line Affected Party No. (PAPs 1-10 are affected by the Power Plant and RVP2)	Estimated % of Land Acquired for Reinjection Line Route (based on 10 m wide corridor)
PAP 12	149 square feet/0.20%
PAP 13	4390 square feet/13%
PAP 14	10733 square feet
PAP 15	17326 square feet
PAP 18	Unknown (governed by RoW agreement)
PAP 19	2740 square feet/7.35%
PAP 20**	12266square feet/10.2% 3894 square feet

***- owns two parcels of land*

Relocation to other sites was considered as part of the RAP process, particularly by two affected parties, but all but one of the affected parties opted for compensation. The costs and benefits of replacement land versus compensation were explained to the relevant parties. In the long-term, impacts are expected to decrease further as affected people realise some of the benefits of compensation, relocation and livelihood restoration initiatives, and as the other mitigation and monitoring measures are implemented along with community development initiatives. A map of Project affected plots is shown below in Figure 4.1 and Figure 4.2.



Source: DGDC

Figure 4-1: Properties Neighboring Power Plant Site

Source: DGDC

Figure 4-2: Properties Neighboring Preferred Reinjection Line

4.2 Economic Displacement and Livelihood Impacts

Along with experiencing physical displacement, some of the parties affected by resettlement for the proposed power plant site and the reinjection pipeline route will experience economic displacement effects as the affected properties include agricultural crops, livestock, and trees. In particular, surveys show that five of the directly affected parties for the power plant site and one tenant on the pipeline route are presently engaged in agricultural activities, growing citrus and other fruits and vegetables, raising rabbits and sheep on their property. Additionally, one of the parties have agricultural structures that would be affected by the project.

4.3 Gender Impacts

From the responses received, nine of the PAPs are female and eight male which is aligned to the wider Laudat community where 52.6% is male and 47.4% female. Of the female PAPs, one is retired and one is a homemaker, one male PAP is retired and elderly.

4.4 Ecosystem Services

The Project would also potentially impact ecosystem services in the Project area. The key ecosystem services which have the potential to be significantly affected by the Project are the ecotourism resources including medicinal plants, handicrafts, and water related resources. However, many of these resources were severely damaged in the hurricane. Additional on-site surveys would be required to determine with certainty the extent of the ecosystem services impacts, but given the hurricane damage, the likelihood of unique ecosystem services being affected is considered low.

5. ELIGIBILITY AND ENTITLEMENT

5.1 Overview

In the context of this RAP, 'entitlement' is a concept through which we determine the amount and type of compensation (or other support) to be provided to a PAP for a particular impact or loss category. The process begins by linking an array of affected assets and economic activities to an affected interest or legal right, then to a potentially affected party who is deemed 'eligible' or not according to specific conditions. If qualified, the affected party is then a candidate and considered 'entitled' to an appropriate compensation package. An entitlement matrix then identifies the category of affected PAPs along with their entitlement to the various forms of support. In this instance, the affected assets are considered to be crops, structures, properties and economic activity (farming).

5.2 Eligibility and Cut-Off Date

In order to identify persons who will genuinely be displaced by the Project and who are eligible for compensation and assistance and differentiate from ineligible persons (such as opportunistic parties hoping to claim benefits), a cut-off date has been established. After the cut-off date, it is considered that the affected parties and wider public have been appropriately informed not to make improvements to, or settle on, the identified project land. Under the requirements of OP 4.12, the Project is not required to compensate encroachers after this date. The cut-off date for this Project has been established as 15 November 2020. This is the date that the detailed socio-economic survey in the community was completed for most of the affected parties,(others had been done prior and were updated) and whereby the final number of farmers on the site was confirmed. Any additional persons establishing farming plots or other activities on the site after the cut-off date will not be considered as PAPs and will not be eligible for compensation. Because the potentially affected community is small (21 total property owners), the cut-off date was communicated directly to the community during meetings and one-on-one interviews, during August to October 2020.

5.3 Entitlement Matrix for Compensation

The entitlement matrix presented below in Table 5.1 captures all PAPs, the characteristics of the impact, and the types of compensation/measures to be applied. PAPs will be entitled to a combination of compensation measures, relocation and livelihood assistance, depending on the nature and extent of the impact and lost assets, as detailed in Tables 6-1 to 6-3, and their preferences. Social and economic vulnerability will be considered in determining the level of assistance provided (as discussed in Section 5.4).

Compensation and assistance will broadly consist of one or more of the following types:

1. Compensation for loss of land;
2. Compensation for the loss of trees or crops;
3. Compensation for the loss of structures;
4. Transitional financial assistance to support any movement of structures or crops;
5. Income restoration for the loss of a business or significant agricultural loss;
6. Livelihood restoration assistance; and
7. Additional support for identified vulnerability.

A principle of this RAP is that affected party livelihoods will be restored to pre-project standards and, if possible, improved. PAPs determined to be entitled to replacement land were offered that option. Details of the PAPs entitled to some form of compensation are described in Section 6. The nature of the compensation proposed following assessment of entitlement and eligibility is provided in Section 6, Valuation and Compensation.

Table 5-1: Entitlement Matrix

PAP Category	Type of Loss	Eligibility Criteria	Entitlement	# PAPs Affected	Details of Support/Compensation
Power Plant, Production Well, Reinjection Well and Reinjection Route Landowners (where more than 20 percent of land needs to be acquired for the Project)	Permanent loss of land	Land title or other document establishing ownership in case of unregistered land to affected property, those without legal rights to the land at time census begins but with a recognizable claim to the land, those with no recognizable claim to the land they are occupying	Compensation at replacement cost[6] Valuations done using market value (considerations detailed in text following matrix) plus all transaction costs and statutory fees.	13 – PAP #1,2,3,4,5,6,7,9,10,11,16,17, 21 Note: PAP 9 is a legacy property for WW01	Appropriate price/compensation as mutually agreed with the landowners. The value agreed will be based upon the individual valuations completed by the Dominica Lands and Surveys Division, consistent with the methodology outlined in the basis of compensation letter completed by DGDC for the RAP included in Appendix A. This meets replacement costs per OP 4.12
Power Plant, Production Well, Reinjection Well and Reinjection Route owners or land users	Permanent loss of trees and crops	Permanently growing crops or trees on affected property for at least one year prior to property acquisition, including pre-hurricane Maria.	Financial compensation for crops/trees. Valuations done using combination of cost of production, selling price at time of valuation and future bearing capacity.	6 – PAP #1,2,3,6,7,10	Cash compensation for the loss of trees, crops, perennials based on2021 estimates
Power Plant, Production Well, Reinjection Well and Reinjection Route owners or occupants	Permanent loss of a residential structure	Permanently residing on the affected property prior to property acquisition, including pre-hurricane Maria.	Compensation for lost assets. Structure will be valued by the PVU and compensation paid to the owner of the structure. Moving/transitional assistance	2 – PAP #1, 3	Appropriate price/compensation as mutually agreed with the landowners based upon Government valuation asset values. Moving assistance in lump sum payment.
Power Plant, Production Well, Reinjection Well and Reinjection Route owners or land users	Permanent loss of an agricultural structure	Commercial structure present on the affected property prior to property acquisition.	Compensation for lost assets. Structure will be valued by the PVU and compensation paid to the owner of the structure. Moving/transitional assistance.	2 – PAP #1, 3	Appropriate price/compensation as mutually agreed with the landowners based upon Government valuation asset values. Moving assistance in lump sum payment.

[6] Replacement cost means that the affected person can replace the affected asset to the same condition. Replacement cost typically reflects market value plus transaction costs, transfer or retitling fees, and salvageable materials.

Note: 1.Two of the four structures referenced in the text have been abandoned for 5 plus years. Only one PAP resides on his property. 2. All compensation is at replacement cost

PAP Category	Type of Loss	Eligibility Criteria	Entitlement	# PAPs Affected	Details of Support/Compensation
Land owners with loss of income due to loss of land use	Loss of income	Farmers or business owners operating on affected property at the time of the census	Assistance for livelihood restoration. Provide access to existing social programmes: 1.Elderly pension and health care services 2.Skills training programmes	6- PAP #1,2,3,6,7,10	Loss of income compensation will be provided based upon a percentage of income loss experienced by the affected party.
Vulnerable households including households headed by women, elderly, very poor, disabled, or those affected or displaced by the effects of Hurricane Maria	Loss experienced by vulnerable parties	Qualifies under one of the above eligible criteria and is considered 'vulnerable' including widows, sole income source in the household, elderly.	Additional assistance to households for 3% of their annual income according to vulnerability levels.	4 – PAP #1, 2, 17, 20	Supplemental compensation for loss of annual income. Priority for community enhancements including health and education components. Priority for livelihood and agriculture restoration components. Priority for suitable employment and transport to nearby shopping if needed.

5.4 Vulnerable Parties and Gender Considerations

Vulnerable parties are often at a disadvantage to participate and benefit from social and economic opportunities in their communities or need special assistance to do so. Women have important economic roles and engage in a very wide range of income making activities in the agricultural and marketing sector. The RAP pays particular attention to ensuring that vulnerable people and women are the recipients of compensation pertaining to and reflecting their full activities. As a result, women and vulnerable people have been encouraged to actively participate in all Project-related resettlement consultations and negotiations and certain meetings have been conducted with women's groups. Special mitigation actions / measures for vulnerable people / women have been prepared and included in the RAP (Section 7). All compensation due to woman-headed families will be given directly to the woman family head. RAP monitoring and evaluation will pay special attention on the impact of resettlement on women and other vulnerable people. Assistance to vulnerable parties is discussed further in Section 7.2.

6. VALUATION AND COMPENSATION

6.1 Assessment of Land Value

The valuation methodology for the land compensation presented below was based on initial valuations by the provided by the Department of Lands and Surveys in July 2018 for some of the properties and estimates by DGDC based upon reference to other land valuations completed by the Department of Lands for the properties in the same area in 2017. The values were revisited in September 2020, and have remained the same given no major changes from the July 2018. The landowners were notified that their properties could be required for the project. Owners, or their representatives, of five of the seven properties under consideration for the power plant were present when the land surveys were carried out. The compensation rates to be proposed to the landowners were developed considering compensation based upon replacement value, as required by OP4.12, which includes; the market value of the land, transactional costs (legal fees associated with the process of selling and buying of land on average 10.5 % of market value), and any other fees associated with time delays as enshrined in the laws of Dominica. In ascertaining the market value of land, the property valuation unit of the Ministry of Housing and Lands relies on the individuality of each property. Physical inspection of the sites are carried out and factors such as services, access, topography, land use, size and market demand are taken into consideration. As noted below, Parties 4, 5 and 7 are included in the RAP and valuation estimates, but properties not directly required for the Project. They are included in the plan due to potential noise, visual and construction impacts. Formal property evaluations and negotiations and compensation will be completed by the GoCD, Department of Lands and Surveys, prior to construction. Affected parties shall be properly consulted in line with OP 4.12, IFC PS5 and OP-710 prior to any land acquisition. An estimate of relevant property values is provided in the Table below.

Table 6-1: Assessment of Property Values

Affected Party No.	Affected Area Project Component	Land area	Total Land Compensation* Replacement Value
1	Power plant site	439,520 ft^2	EC$ 378,150 USD 139,916
2	Power plant site	158,994 ft^2	EC$ 255,500 USD 94,535
3[7]	Power plant	32,670 ft^2	EC$ 163,350 USD 60,440
4[8]	Power plant	45,128 ft^2	EC$ 135,384 USD 50,092
5[8]	Power plant	23,216 ft^2	EC$ 69,652 USD 25,771
6	Power Plant	17,688 ft^2	EC$ 88,440 USD 32,723

[7] Owner has also expressed to DGDC that if power plant is constructed, they wish DGDC to purchase as they do not wish to live next to the power plant. Value:DGDC estimated based on surrounding lands.

[8] Property not required for the Project, but included in the plan due to potential noise, visual and construction impacts, and possibility that owners may wish to move if power plant is constructed.

Affected Party No.	Affected Area Project Component	Land area	Total Land Compensation* Replacement Value
7[8]	Power Plant	4,797 ft^2	EC$ 9,594 USD 3,550
8	Legacy Property	37,035 ft^2	EC$ 19,550 USD 7,234
9	Legacy Property	242150 ft^2	EC$ 361,335 USD 133,694
10	Production Pad(RVP2)	7.56 acres	EC$ 300,000 USD 110,420
11	Reinjection Pad	0.842 acres	EC$ 25260 USD 9,346
12	Pipeline route	149 ft^2	(based on 10m wide corridor): EC$ 522 USD 193
13	Pipeline route	4390 ft^2	(based on 10m wide corridor): EC$ 15365 USD 5,685
14	Pipeline route	10733 ft^2	(based on 10m wide corridor): EC$ 37,565.50 USD13,899
15	Pipeline route	17326 ft^2	(based on 10m wide corridor): EC$51,978 USD19,232
16	Reinjection Pad	1.6469acres	EC$49407 USD18,281
17	Reinjection Pad	21344.4ft^2	EC$17150 USD6,346
18	Pipeline route	Unknownft^2	(based on 10m wide corridor):easement agreement in progress
19	Pipeline route	2740ft^2	(based on 10m wide corridor): EC$13,700 USD5,069
20**	Pipeline route	1.12268ft^2 2.3894 ft^2	(based on 10m wide corridor): 1.EC$ 36,804 USD13,617 2.EC$19470 USD7,204
21	Reinjection Pad	1.44acres	EC$43,200 USD15,984

Source: Government Valuations completed in November 2020 and DGDC Estimates.
**USD Conversion Rates based upon exchange rate of 1 ECD =0.37 USD as of Dec 2020*
***- owns two parcels of land*

6.2 Assessment of Crops/Trees/Livestock Compensation Values

Six identified PAPs will lose assets in the form of their crops. The values presented in the Table below are an estimate of current market value for the crops based on World Bank crop loss data set developed as part of the Post Disaster Needs Assessment after Maria in 2018 presented in $EC (East Caribbean dollars) and United States Dollars (USD) equivalent. Total compensation identified below in Table 6-1 also includes loss of income. The Ministry of Agriculture & Fisheries will carry out valuations of affected crops and determine the actual compensation payment. Valuations are completed by extension officers of the Ministry of Agriculture & Fisheries who have intimate knowledge and understanding of the holdings. Crops are valued using the following bases:

- Cost of Production if farm records exist;
- Market value (selling prices) at time of valuation if no records exist; and
- Bearing capacity for well-established farms.

Crop valuation falls under the purview of the Ministry of Agriculture & Fisheries. The values assigned to crops are specified as a range and are set by a committee of technical experts who take into consideration factors such as the species, location, production cost, market value, climate and environmental influences. The applicable range for each crop is documented in the Ministry's "Crop Valuation Guide", and a comprehensive list of crops and economic trees under the following broad categories:

- Fruit and tree crops;
- Vegetables and herbs;
- Cut flower and ornamental plants; and
- Food and root crops.

Where crops are being valued for displacement from the land or removal of the crop, the economic life of the crop is considered (particularly for tree crops). When a valuation is required for an assessment of damage to the crop, where the crop continues to grow but growth is retarded, the age at the time of damage is considered. The aforementioned provisions are generally in keeping with World Bank policy.

Contrary to local practice, however, OP 4.12 notes that in some countries, the value of the harvest is determined by the average market value of crops for the previous three years. It states further that whatever the multiplier, if food supplies are sold in the area enough cash compensation is paid to purchase equivalent supplies, taking into account the possibility of price increases caused by heightened demand from displaced persons.

Table 6-2: Crop/Tree/Livestock Values

Affected Party No.	Area of affected Crops/Livestock/Trees	Crops/Livestock/Tree Values EC[9]	Total Compensation*
1	70 Rabbits 6 sheep	Both sheep and rabbits to be moved Moving costs estimated at EC$ 1000	EC$ 1,000 USD 370
2	150 Grapefruit Trees 10 Orange Trees 20 Coffee Plants	EC$ 21,730 EC$ 1,449 EC$ 1,670	EC$ 24,849 USD 9,111

[9] Formula for valuation = acreage x years to re-establish crop/tree x typical production per acre x unit value for loss of production + number of crops trees x value to replace crop/tree.

Affected Party No.	Area of affected Crops/Livestock/Trees	Crops/Livestock/Tree Values EC[9]	Total Compensation*
3	Trees/Crops: 8 Orange 5 Lime 8 Lemon 8 Westinsian Lime 4 Grapefruit 8 Tangerine 2 Soursop 4 Coconut 2 Sugar Apple 8 Coffee 4 Valencia Orange 4 Atomic Orange	EC: $1,159 $655 $697 $909 $349 $601 $155 $1,048 $81 $668 $579 $579	EC$ 7,479 USD 2,742
6	Trees/Crops: 6 Orange 6 Grapefruit 1 Sugar Apple 1 Guava 2 Coconut	EC: $869 $523 $41 $47 $524	EC$ 2,004 USD 735
7	Trees/Crops: 31 Orange 3 Coffee 2 Grapefruit	EC: $4,491 $250 $174	EC$ 4,916 USD 1,802
10	Trees/Crops: 200 Dasheen 15 Corn	EC: $600 $130	EC$730 USD270

Source: DGDC November 2020 communication and WB crop rates as used in the Maria PDNA.
**USD Conversion Rates based upon exchange rate of 1 ECD =0.37USD as of Dec 2020*

Figure 6-1: Photograph of Affected Rabbit Hutch

6.3 Assessment of Assets, Residential and other Structures

Four identified PAPs will lose assets in the form of established structures. Determination of the compensation value for the structures was established based upon valuations provided by the Department of Lands and Surveys in July 2018 and revised in November 2020. Compensation for residential and other structures is based on this calculation by the Department of Lands and Surveys. Formal negotiations are ongoing. Photographs of Affected Structures are included in Appendix A. One property PAP#3 is pending valuation since permission has not been provided to access the property. Efforts are being made by the Lands and Surveys Department and DGDC to contact the owner directly to facilitate the process.

Table 6-3: Structural Valuations

Affected Party No.	Sq footage of Affected structure	Total Compensation*
1	Potential Residential House/Currently livestock dwelling – 1,017 ft^2 Rabbit Hutch - 308 ft^2	EC$ 40,000 USD 14,814
2	Incomplete, Abandoned Residential House - 418 ft^2	EC$ 62,700 USD 23,222
3[1]	Abandoned Residential House -	Site inspection pending
5	Residential House - 144 ft^2 Shed -160 ft^2	EC$ 25,000 USD 9,259

*Source: Government Valuations completed July 2018, revised Nov 2020 *USD Conversion Rates based upon exchange rate of 1 ECD =0.37USD as of Dec, 2020.*

[1] PAP lives overseas, caretaker has denied entry to the property for valuations. Communication is ongoing to resolve matter.

There is also one residential property on the reinjection pipeline route, but it is not in the part of the property that is needed for acquisition. Therefore, it is not considered in the table above.

6.4 Compensation Payment Procedure

Formal property evaluations for all of the affected properties will be completed by the GoCD Department of Lands and Surveys prior to construction followed by negotiations with the affected parties. On the basis of these negotiations, and completion of internal processes, the Ministry of Housing & Lands will disburse compensation to the affected parties. Prior to disbursement of compensation, each eligible PAP will sign a compensation certificate which sets out the mutual commitments for each party. The format of the certificates will be easily understandable to affected people. This will be countersigned by the Ministry of Housing & Lands and representatives of DGDC will be present for this process.

Following agreement and signing of the certificates, compensation will be disbursed as indicated, livelihood restoration activities will commence and the PAPs will be requested to vacate the site. DGDC will, in collaboration with the Division of Lands and Survey, be responsible for reporting on the receipt of the financial compensation of the PAPs and will arrange in kind compensation for any follow-up training.

In certain cases, it may not be feasible to pay compensation to all parties before taking possession of the land, for example when the ownership of the land in question is in dispute. There may also be cases where the landowner is out of the country. Under such circumstances, compensation funds shall be made available for each party through deposit into an individual escrow account for that PAP. This is not the case for any of the PAPs covered in this RAP.

6.5 Livelihood Restoration and Enhancement Measures

The benefits of livelihood restoration measures were highlighted to the PAPs during consultation, such as the potential for long-term income generation, and diversification of options for themselves and their families, in contrast with cash compensation which can often be quickly consumed. Most PAPs expressed a preference for cash compensation only. However, additional measures were considered such as counselling in family health matters, business and financial management support, and post-hurricane support.

7. VULNERABILITY ASSISTANCE

Vulnerable people can be defined as, those below the poverty line, the landless, the elderly, disabled, women and children, indigenous peoples, ethnic minorities, or other displaced persons who may not be protected through national land compensation legislation (World Bank, OP 4.12).

Key factors which could be considered indicators of vulnerability for the identified PAPs include:

- Many in the communities impacted reported that they lost the roofs of their homes due to Hurricane Maria;
- Many in the affected communities reported that they have lost their livelihoods as a result of Hurricane Maria;
- Any loss of income related to COVID-19;
- Some of the PAPs are unemployed, low-income or single party headed households; and
- Some PAPs are elderly community members.

The RAP process has considered the potential for impacts on vulnerable PAPs and findings indicate that additional support should be applied to the PAPs as several would be considered vulnerable. Table 7-1 presents a vulnerability matrix for the PAPs.

Table 7-1: Vulnerability Matrix

PAP No.	Sole earner in household	Elderly or Disabled	Unemployed, low income	Receipt of Government Support Programs	Home or livelihood damaged by hurricane	Considered vulnerable
1	No	No	Yes- low income	Yes	Yes	Yes
2	Yes	Yes	Members of household unemployed post-Maria	No	No	Yes
3	Yes	No	No	No	Yes	No
4	Unknown	No	Unknown	No	Yes	Unknown
5	No	No	No	Yes	No	No
6	No	No	Living Overseas	No	No	No
7	No	No	No	No	Yes	No
8	Business	N/A	N/A	N/A	N/A	No
9	No	No	No	No	No	No
10	No	No	No	No	No	No
11	No	No	No	No	Yes	No
12	No	No	No	No	Yes	No
13	No	No	No	No	No	No

PAP No.	Sole earner in household	Elderly or Disabled	Unemployed, low income	Receipt of Government Support Programs	Home or livelihood damaged by hurricane	Considered vulnerable
14	Unknown	No	Living overseas – no contact	No	No	No
15	Unknown (Heirs of newly deceased – no response)	No	No	Unknown	Unknown	Unknown
16	No	No	No	No	Yes	No
17	No	Yes-elderly	No	No	Yes	Yes
18	Business	N/A	N/A	N/A	N/A	No
19	Yes	No	No	No	No	No
20**	Yes	No	Yes	No	Yes	Yes
21	No	No	No	No	Yes	No

*Notes: N/A as this is a commercial business. **- owns two parcels of land*

7.1 Forms of Assistance

Three of the PAPs are unemployed or low-income, four are sole earners in their households and two are elderly or are supporting elderly family members and ten experienced loss after Hurricane Maria. In total, four of the PAPs would be considered vulnerable. As such, the RAP provides an additional safety net for vulnerable households. Project-affected households and landowners that are vulnerable could potentially experience severe hardship during the livelihood restoration process and as such monitoring of these parties will be particularly important. Regular visits to each PAP will be conducted to ensure that the PAPs retain their place to live, means of income, access to medical care, and access to food and welfare of vulnerable persons, in this case all of the PAPs will be specifically tracked and reported upon by the DGDC. Further detail on Project roles and responsibilities in included in Section 10.

7.2 Compensation for Vulnerable PAPs

Compensation due to vulnerable PAPs will comprise:

- Cash payment for the supplemental compensation consisting of 3% of the PAPs typical annual income for a year by the DGDC;
- Additional assistance may take the following forms, depending upon vulnerable persons' requests and needs;
- Assistance in employment training, access to and provision of healthcare, and educational support;
- Assistance in the compensation payment procedure (e.g. specifically explain the process and procedures, make sure that documents are well understood);
- Assistance in the post-payment period to secure the compensation money and reduce risks of misuse/robbery; and
- Counselling in domestic matters such as family, health, or finances.

8. STAKEHOLDER ENGAGEMENT

8.1 Introduction

In the context of resettlement and economic displacement, stakeholder engagement serves as both an opportunity for information exchange for consultation purposes and as a collaborative form of decision-making and participation. Full details of the stakeholders consulted during each stage of the ESIA process, and the detailed outcomes and observations are provided within the ESIA, the Addendum to the ESIA and Project Stakeholder Engagement Plan (SEP) and are not repeated in this RAP.

The main objectives of consultation undertaken to date for the Project include:

- To provide information about the Project and its potential impacts to those interested in or affected by the Project, and solicit their opinion to that regard;
- To understand and address stakeholder concerns and expectations of the Project;
- To manage any unrealistic expectations and address misconceptions regarding the Project;
- To ensure participation and acceptance of the Project throughout the lifetime of the project by the key stakeholders including the community;
- To provide avenues to address any stakeholder grievances regarding the Project; and
- To agree on the asset valuation / compensation and livelihood restoration measures associated with this RAP process and discuss potential concerns.

8.2 Consultation with the Affected Community

During the geothermal drilling phase, eleven general public meetings were held in the potentially affected communities in November and December 2013 and January 2014. Five were held in Laudat, three in Trafalgar and three in Wotten Waven. A visit to the current geothermal power plant in Guadeloupe was also conducted in 2012 with members of the community to experience first -hand the workings of an operational plant. Additionally, school visits were conducted in February and March 2012 from the Wotten Waven Primary School, Trafalgar Primary School, Morne Prosper Primary School, Laudat Primary School, and Laudat Primary School where students and staff toured the drilling sites. In addition to the recent public engagement, the Grievance Mechanism was socialised within the community during the 2017 social baseline survey process.

Additionally, a town hall meeting was held in Trafalgar in December 2016 with approximately 40 in attendance to discuss the current project and ESIA. Another town hall meeting was held in Laudat in July 2017 with 43 in attendance. A third town hall meeting was held in Wotten Waven in August 2017. A final town hall meeting will be held to present the findings of the ESIA in May or June 2018. In order to facilitate further understanding of community needs and conditions, focus group meetings were held in 2016, 2017 and 2018 in Wotten Waven, Trafalgar and Laudat, described in further detail below. Because the total population of the Project AOI is relatively small (approximately 1,600), and given that the general public and many of the focus groups and landowners that would be affected by the Project are the same parties, the four formal public meetings and 15 informal forums held on the Project were considered representative of the community.

A total of 15 focus group meetings were held as part of the ESIA baseline data collection. A meeting with six representative community leaders from all of the potentially affected communities was held in Trafalgar in November 2016 to discuss the Project and the most effective means of stakeholder engagement. Focus groups meetings were also held in June, July and August of 2017 including meetings with representatives of local hotels and resorts, handicraft vendors, hot springs businesses, and unemployed parties in the area.

Groups consisted of 5-15 people and targeted questions were asked and recorded. In addition, five focus group meetings were held in the communities in March 2018 following Hurricane Maria. These included meetings with community women in Laudat, Wotton Waven and Trafalgar, and vendor meetings in Wotton Waven and Trafalgar, to identify the impacts on the community of Hurricane Maria which hit Dominica in September 2017 and to understand how conditions in the Project area have changed since the ESIA baseline data was collected pre-Hurricane Maria.

Two national consultations on the Jacobs ESIA were conducted in February 2019 one in the south and one in the north (Portsmouth). A series of public meetings to update the community on the changes in the project were held in June 2020. Given the COVIS-19 public gathering protocols, the DGDC conducted 3 sessions per day for three days to allow for maximum community participation. As part of the ESIA process for the Eclipse Inc conducted 3 focus group (women, landowners and youth) meetings in August 2020 and another meeting to present the findings of the ESIA to the community in November 2020.

8.3 Consultation on the RAP

In accordance with the WBG policies ("Involuntary Resettlement Policy" and "Land Acquisition and Involuntary Resettlement" respectively), consultation on the RAP included conducting a socio-economic census survey in 2017-2018; consultation with the project affected parties on the RAP with relevant government institutions such as the Department of Lands & Surveys; and presentation of the findings of the RAP to the affected communities in 2018. Further consultations were held with new PAPs in 2020 and updated census information for those previously interviewed. The recurring concern of PAPs was that they would be fairly compensated for their lands in a timely manner. DGDC continues to present the issue of timely acquisitions and compensation to the Ministry of Lands. The relevant department consists of a small staff and various government re-housing projects are in progress. Any comments on this RAP from the community or relevant institutions will be incorporated into a final RAP. The RAP will be updated as necessary with any new information from consultations with community or relevant institutions.

9. RESETTLEMENT SITES

In accordance with World Bank resettlement policies, resettlement sites were considered for two of the PAPs identified. One preferred site was identified on the basis of location, community continuity, access to productive resources, employment, and livelihood restoration consideration. The affected PAP wanted to remain local, on a site with land that would be productive for agriculture, and with easy access from local roads, on plots of a similar size to their previous property. A photograph of the preferred site for resettlement site is included below in Figure 9.1. The costs and benefits of replacement land were explained to both PAPs. However, although the pros and cons of replacement land were explained in detail to this party, one of the two PAPs has now indicated a preference toward compensation as they felt that they would prefer the cash and would be in a better position to negotiate a lower price for the land.

Figure 9-1: Photograph of Resettlement Site 1

An additional PAP had expressed interest in a replacement property, but no specific site had been identified. This PAP has since indicated a preference for cash compensation. All the other PAPs with affected property opted for cash compensation.

Only one single person household will be physically displaced.

10. ROLES AND RESPONSIBILITIES

10.1 Overview

The land acquisition process including negotiations and final compensation will be completed by the GoCD Department of Lands and Surveys including addressing any grievances related to land acquisition. DGDC will manage livelihood restoration related and resettlement (not including land acquisition) grievances consultation, grievance redress, monitoring and evaluation of the affected parties for this RAP. DGDC has appointed a Community Liaison Officer (CLO) and Social Safeguards Specialist to support the ongoing community consultation and engagement process, both generally and specifically regarding this RAP, and who will support in this process. The CLO role will continue into the operational phase. A cooperation agreement between the DGDC and GoCD is in place (November 2019) to formalise this relationship.

10.2 Organizational Responsibilities

This section presents the organizational framework for implementing resettlement, including:

- identification of agencies responsible for delivery of resettlement measures and provision of services;
- arrangements to ensure appropriate coordination between agencies and jurisdictions involved in implementation; and
- and any measures (including technical assistance) needed to strengthen the implementing agencies' capacity to design and carry out resettlement activities; provisions for the transfer to local authorities or resettlers themselves of responsibility for managing facilities and services provided under the project and for transferring other such responsibilities from the resettlement implementing agencies, when appropriate.

Key roles and responsibilities with regards to the RAP are set out in Table 10-1.

Table 10-1: Roles and Responsibilities

Stakeholder	Interest	Roles/ Responsibilities	Timescale for Action
GoCD	Responsible for Land Acquisition Process	Complete formal land valuation for each property Complete compensation negotiations with each PAP Disburse compensation to each PAP. Manage acquisition of replacement properties as needed. Ensure the receipt of the financial compensation of the parties. For replacement property, ensure that once the property cost has been agreed, the property would then be transferred to them. Manage grievances related to land acquisition.	Prior to construction (2-3 months)
PAP	Affected properties, structures, and economic activity on site	Engage with socio-economic surveys Engage in consultation process Vacate project site as agreed on compensation certificate. Vacate project site upon complete implementation of this RAP	Present-vacation of site (next 4 months)
DGDC	Project developer	Engage appropriate organisations/individuals to implement the RAP. Facilitate good communications and relations with the PAPs	Present-ongoing

Stakeholder	Interest	Roles/ Responsibilities	Timescale for Action
		Manage livelihood restoration process and vulnerable party resettlement issues. Respond to livelihood restoration and resettlement (not including land acquisition) feedback and grievances in a timely manner.	
Social Safeguards Specialist	DGDC team	Implement RAP economic displacement Provide liaison between DGDC and PAPs Monitor RAP, with particular attention to vulnerable persons Identify and provide additional support as required.	Present-ongoing throughout Project operations
CLO	DGDC team	Support Implementation of RAP Manage General Grievances Responsible for general Project-related community consultation.	Present-ongoing throughout Project operations
Consultant	Consultant	Audit / supervise the process.	TBD
Eclipse	Consultant	Conduct socio-economic surveys of PAPs	July-November 2020

10.3 Compensation Payment Procedure

Appendix B presents the basis of proposed compensation and plan for each PAP including livelihood restoration. Prior to disbursement of compensation and commencement of livelihood restoration measures, each eligible PAP will sign a compensation certificate which sets out the mutual commitments for each party. The format of the certificates will be easily understandable to the PAPs. This will be countersigned by GoCD Department of Lands and Surveys. This compensation plan includes commitments as follows:

- GoCD to pay the agreed compensation prior to the commencement of project construction and land clearance;
- PAP to vacate the affected land including harvesting crops prior construction; and
- Both parties to abide by the requirements of the RAP.

Following agreement and signing of the certificates, compensation will be disbursed to the bank account of the owner of the property and resettlement and livelihood restoration activities will commence and the PAPs will be requested to vacate the site. The GoCD will be responsible for ensuring receipt of the financial compensation of the parties. Vacation of the site will be carried out by the PAPs and monitored by DGDC.

10.4 Resettlement Procedure

If applicable, once a suitable resettlement site has been identified, the Department of Lands and Survey shall formally survey the property and negotiate with the PAP and upon agreement submit request for permission for its transfer. The Department of Lands and Surveys is only able to accommodate resettlement for properties/lands owned by the State. There is no provision for acquiring private property for transfer. This process includes commitments as follows:

- GoCD to transfer the property to the PAP prior to the commencement of project construction and land clearance, purchase, certification and transfer;
- PAP to vacate the affected parcel including harvesting crops prior construction; and
- Both parties to abide by the requirements of the RAP.

10.5 Livelihood Restoration and Enhancement Measures

DGDC will support with the coordination of any transport or livelihood restoration support measures required by the PAPs during the physical relocation process. Resources of the GoCD will be utilised as required to support this process. Careful monitoring and evaluation will be required to manage the risk of unnecessary hardship, and to confirm that the various assistance activities are working as intended. The monitoring process is described in further detail in Section 12 of this document.

11. GRIEVANCE MANAGEMENT

11.1 Overview

The Dominica Geothermal Development Company (DGDC) is committed to ensuring compliance with the Environmental and Social Management Plans (ESMP) policies and procedures.

The Project is committed to maintaining lasting, transparent, culturally appropriate and efficient relationships with its internal and external stakeholders, through communication and engagement measures that allow receiving, analyzing and solving any concern, doubt, question regarding the environmental and social performance of the Project in all of its activities. The External Grievance Mechanism is an instrument to guarantee transparency and commitment between the Project and the local population.

Based on the foregoing, the Project has developed an External Grievance Mechanism with the objective of identifying and managing the potential external nonconformities (e.g. from the affected communities) and/or complaints in a timely and effective manner.

This grievance mechanism is on place and has been communicated to the community and general population. It is published on DGDC's website (www.geodominica.dm) and allows for grievances to be submitted online and anonymously.

11.1.1 Objective

Establish an External Grievance Mechanism so that the Project can handle external complaints, presented by stakeholders outside the Project (e.g. affected communities, external stakeholders, interested groups, etc.), during the development of its projects by giving them an adequate response, generating satisfactory agreements and implementing compensatory and corrective actions, when necessary.

By establishing an effective External Grievance Mechanism, DGDC will be able to manage potential conflicts of interest by segregating the roles and responsibilities of individuals involved in the concern, suggestion or grievance management process and avoiding placing individuals in a position where conflicts could be perceived to arise. The Project recognizes that unforeseen impacts may occur, and that the maintenance of an open line of communication with the communities and/or those potentially affected by the Project is important to maintain transparent and cordial relations. In addition, international standards require the establishment of an External Grievance Mechanism in order to address the interested parties' concerns.

As a general policy, DGDC will work proactively towards preventing grievances through the implementation of mitigation measures (as identified by the ESIA) and liaising with the community. These activities are designed to anticipate and address potential issues before they become grievances. This will be the responsibility of the Project Manager and the Community Liaison Officer (CLO).

The sections below consider types of grievances that may arise, confidentiality and anonymity, and the Project's grievance resolution process.

The grievance mechanism covers the various aspects of the Project, including:

- The Project in general, including planning, construction and operation;
- The process of environmental impact assessment; and
- The compensation and resettlement processes.

Each affected person is free to register a grievance, in accordance with procedures specified below. The grievance process focuses on first identifying whether the grievance can be addressed through additional

communication between the complainant and members of the Project Team, or by providing additional information to the complainant. If the grievance cannot be resolved internally, the Project Team will then seek to resolve the grievance through mediation by local authorities, and finally, if a resolution cannot be reached, judicial appeal. The procedure does not replace the public mechanisms of resolution of conflicts in Dominica's legal system but covers the legal process in the Grievance Mechanism to minimize the management of grievances and escalation to the judicial system.

11.1.2 Scope of Application

This plan will apply during the development of DGDC's activities and during the Project's life cycle. It is DGDC's responsibility to ensure that reception complaints are aligned to international best practices.

11.1.3 Definitions

The main terms used in this document are defined below:

Table 11-1: Terms and Definitions

Term	Definition
Claim	Concern, suggestion, complaint, or grievance raised by an individual or group of individuals that need to be addressed.
Claimant	Person or group of people communicating a claim to DGDC.
Concern	Requests for information or general negative perceptions unrelated to a specific Project impact or incident. If not addressed to the satisfaction of the claimant, concerns may become claims.
Conflict of interest	A conflict of interest exists where there is a divergence between the interests of an employee or contractor and his or her responsibilities or capabilities under this directive, such that an independent observer might reasonably question whether the actions of that person are influenced by his or her own interests.
Contractor	An individual or a company that has entered into a contract to provide goods or services to DGDC. The term covers parties directly contracted by DGDC and those contracted by a Contractor company, also referred to as subcontractors.
Grievance	A an actual or perceived problem raised by an individual or group of individuals that that might give grounds for complaint and needs to be addressed. Claims can result from either real or perceived impacts of DGDC's operations. The terms "claim" and "grievance" can be used interchangeably.
Suggestion	Proposal, insinuation, or indication that is submitted with the aim of proposing an action to improve DGDC's internal processes.
Retaliation	Any adverse action taken against a Claimant, employee, or contractor whose purpose is to frustrate the operation of this directive.
External Grievance Mechanism	A procedure through which a grievance can be raised by a member of the community, assessed, investigated and responded to. It is also a framework through which workers can gain access to remedy for any adverse impacts or damage they have suffered as a result of business activities.

11.2 Roles and Responsibilities

In order to properly implement the External Grievance Mechanism, DGDC requires the involvement of the people listed below.

Table 11-2: Roles and Responsibilities

Role	Responsibilities
Board of Directors	■ Review and approve the External Grievance Mechanism.
Finance & HR Manager	■ Ensure the availability of resources necessary for the implementation of the External Grievance Mechanism.
Safeguards Manager	■ Ensure the correct implementation of the External Grievance Mechanism.
Representative of DGDC's Legal Area	■ Evaluate and determine the origin of the complaints received and define the measures to be taken in response, as suitable according to what is stated in this plan.
Managing Director	■ Be familiarized with the External Grievance Mechanism and provide the necessary resources to ensure its proper implementation.
Safeguards Manager	■ Ensure the correct implementation of the External Grievance Mechanism. ■ Review and approve the contractor project-specific External Grievance Mechanism. ■ Update the External Grievance Mechanism.
Grievance Mechanism Team	■ Be familiarized and disseminate the External Grievance Mechanism among external stakeholders. ■ Prepare the Communication Report, and follow up on the feedback received. ■ Share the External Grievance Mechanism Database with the Managing Director. ■ Share the received feedback with the Project Manager.
Community Liaison Officer (CLO)	■ Collect on a weekly basis the complaints presented, whether submitted physically or via website. ■ Review the nature of the complaint, as well as the company's departments potentially involved. ■ Solve, as immediate as possible the feedback received, if there are conditions to do so. ■ Keep a record of the solutions that were given for documentation, monitoring or verification of the solution applied.
Employees, contractors and subcontractors	■ Read and be familiarized with the External Grievance Mechanism.

Source: DGDC, 2020

11.3 Activities

The External Grievance Mechanism Plan establishes the guidelines for external stakeholders to submit complaints, grievances and concerns arising from any project's activities and operations, ensuring the accessibility and effectiveness of the process.

11.3.1 Principles

DGDC recognizes that this plan has to guarantee the same level of integrity and respect for all the people involved, as well as for any type of claim. To this regard, the Project's External Grievance Mechanism will be:

- **Understandable and reliable** (e.g. the affected stakeholders must understand the procedure, the confidentiality of the person filing the complaint must be protected, the expected deadline for receiving a response must be shared);
- **Culturally appropriated and accessible** (e.g. complaints can be filed in the local language, the technology required to file a complaint must be of common use, illiterate people can file complaints verbally);
- **Free of charge** (e.g. raising a complaint will not have any cost);
- **Anonymity** (e.g. the claimant will have the option to remain anonymous);
- **Proportional** (e.g. to provide the appropriate level of management to address the grievance promptly);
- **Rights-Compatible** (e.g. outcomes and remedies will be in line with internationally recognized human rights legislation and national law. No aspect of the mechanism will prevent community members from enforcing their legal rights. Community members will be protected against retaliation for having raised complaints);
- **Inclusive and non-discriminatory** (e.g. all grievances, from all community members regardless of age, ethnicity, mental or physical disability, race, religion, gender, sexual orientation or gender identity, will be accepted, reviewed and solved as needed);
- **Transparent** (e.g. every complaint will be treated seriously, and dealt with consistently and in an impartial, confidential and transparent manner. The process is transparent and provides timely feedback to the claimant).

The present plan establishes the guidelines of the External Grievance Mechanism and describes how the Project along with its CLO will proceed in order to adequately and satisfactorily address the possible complaints expressed by the community or other external stakeholders. Complaints related to internal stakeholders (e.g. workers, contractors, subcontractors, etc.) are covered on the Internal Grievance Mechanism Management Plan.

The External Grievance Mechanism aims to prevent social contingencies and conflicts with the people that might be affected by the development of the Project, since it will provide, at all times, effective attention, and it has the obligation to respond to the requests of all claimants.

DGDC has established a process for the reception, registration, review, analysis, resolution and evaluation of complaints, claims and concerns to be implemented in all of its projects. The process will be documented through a physical record file and will end with the closure and written agreement on the resolution of both parties (i.e. the claimant and the Project).

11.3.2 Publication of the Mechanism

Based on the Stakeholder Engagement Plan, the Safeguards Manager and CLO will continue to inform the affected communities and other external stakeholders about the Grievance Mechanism previously disclosed and the communication channels to submit complaints, claims or suggestions regarding any activities related to the Project, as well as how and where to submit them. This information will be shared through:

- Direct dialogue;

- Distribution of printed material such as brochures and posters, which will be proposed by the ESG team and reviewed by the Marketing and Communication management of DGDC;
- Available information at the Community Centre;
- Press and media; and

11.3.3 Grievance Mechanism Procedure

In order to ensure the proper implementation of the External Grievance Mechanism, and the resolution of the feedback received, this mechanism is divided into four main steps. These steps are presented in the figure below.

Source: ERM, 2020

Figure 11-1: General Grievance Mechanism Procedure

These steps are designed based on the recommendations of the International Finance Corporation (IFC), through which a communication channel and responsible for monitoring in each of them is designated.

11.3.3.1 Reception and Registration

The CLO will manage the External Grievance Mechanism. The external claimants will be able to submit their grievances through the following reception channels:

- Website – www.geodominica.dm

  Telephone and emails. The points of contact for grievances and comments are:

Name:	Allan Toussaint
Address:	Floors 1&2, 18 Kennedy Avenue, Roseau
Email:	Allan.toussaint@geodominica.com
Telephone Number:	(767) 448 6178/79; 275 7392

Name:	Lyn Fontenelle

Address:	Floors 1&2, 18 Kennedy Avenue, Roseau
Email:	Lyn.fontenelle@geodominica.com
Telephone Number:	(767) 448 6178/79; 235 5462

- A Grievances Mailbox placed at the Community Centre. The mailbox's precise location will be shared with the community during public consultation and other disclosure of information events.

Any complaint or suggestion that is entered by the aforementioned means must follow the External GM form which shall contain the following information:

- Place and date of the complaint or suggestion;
- Reason for the feedback, with details of the events;
- Claimant's contact information (In case the grievance is not anonymous); and
- Claimant's proposed solution to the issue.

The process will begin with the receipt of a complaint or suggestion by the CLO and notify the claimant that the claim has been received, will be reviewed and taken for analysis. DGDC's grievance flow chart is provided in the figure below.

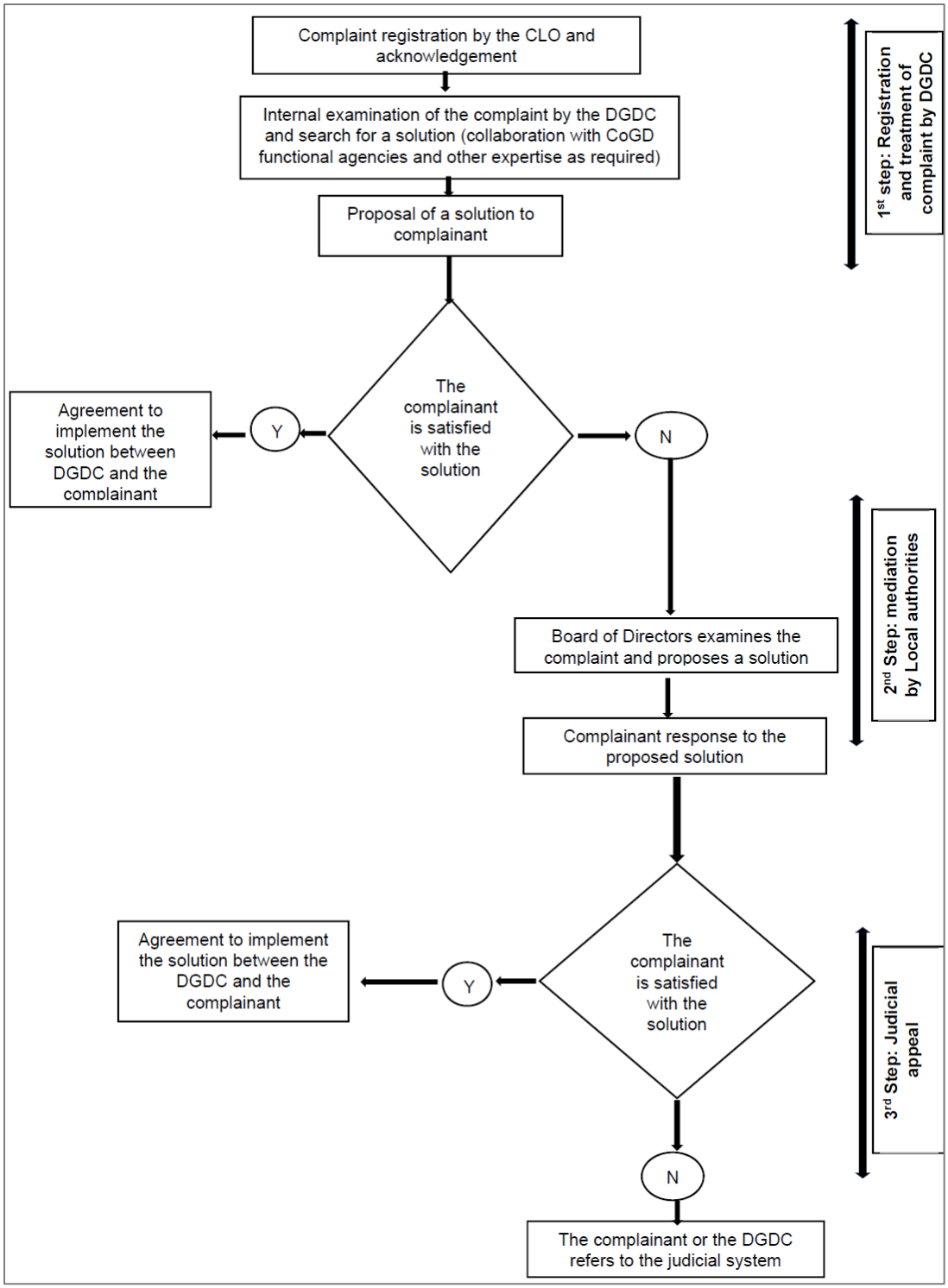


Figure 11-2: DGDC's Grievance Flow Chart

Once the suggestions and/or complaints have been received, the CLO will complete the Communication Report and the information collected regarding the complaint and/or suggestion will be captured in the External GM Database to register the complaints and/or suggestions.

If the claim is readily resolvable (e.g., a request that can be immediately granted or an easy solution can be applied without an investigation process), the person from the CLO receiving the claim takes action to address the issue directly and records the details in the External GM Database. If the claim subject is considered sensitive by the claimant (e.g., in cases regarding abuse, sexual harassment, or other forms of gender-based violence), a special point of contact with adequate training will be provided. The claimant will have the option to talk to a point person of their same gender, if requested.

Claims will not be applicable in cases when:

1. It is not directly related to DGDC, its contractors, or subcontractors;
2. It is out of DGDC's influence;
3. Its nature exceeds the scope of the present External Grievance Mechanism;
4. The claimant has no standing to file; and/or
5. There are other formal mechanisms/institutions or community procedures more appropriate to address the issue.

When the claim is classified as non-applicable following the above criteria, DGDC will clearly communicate the reasons why it cannot be considered to the claimant, and when possible, DGDC will provide information to help them redirect their claim to the right institution or party.

The External Grievance Database is updated weekly to reflect the current state of the claim until the claim has been resolved according to the claimant. Reception of the claim will be acknowledged within ten (10) days after the claim is received. If an investigation is needed, this will take up to 30 days (low risk claims), up to 15 days (medium risk claims) and 5 days (high risk claims).

The Project will provide a means by which all external stakeholders will be able to raise anonymous complaints. This gives the most vulnerable members of the affected communities, the confidence that they will not be retaliated against for raising concerns and can be fundamental to shifting power dynamics in between the Project and the communities. Therefore, in case of an anonymous case, the resolution will be published on a visible and accessible notice board at the Community Center.

11.3.3.2 Review, Analysis and Investigation

Once the complaints have been filed, the review, analysis and investigation process will unfold as follows:

1. The CLO will collect on a weekly basis the complaints presented, whether submitted physically or via website, and will review the nature of the complaint, as well as the company's departments potentially involved;
2. The CLO will make an initial assessment of severity in coordination with the H&S Manager, if necessary. The grievances will be classified in four categories:

Table 11-3: Classification of Grievances

Classification	Risk Level	Validity	Response
Non-Admissible	None	Unsubstantiated	CLO will clearly communicate the reasons why it cannot be considered to the claimant, and when possible, provide information to help them redirect their claim to the right institution or party.
Low	No or low	Unsubstantiated	CLO will conduct investigation, document findings and provide a response

Classification	Risk Level	Validity	Response
Medium	Possible risk and likely a one-off event	Possible substantiation	CLO and an appropriate investigation team will conduct investigation. The Site Manager or Occupation Health and Safety Manager may decide to stop work during the investigation to allow the corrective preventive actions to be determined. The CLO will provide a response.
High	Probable risk and could reoccur	Probable substantiation	CLO will get the contractor to organise a Major Investigation Team including DGDC and GoCD for prompt investigation and resolution. Work will be stopped in the affected area. The CLO will provide a response.

a. **Non-Admissible** (e.g. claims that are not directly related to the Project, its contractors or subcontractors, out of DGDC's influence);

b. **Low Risk** (e.g. claims that do not require resolution per se, but instead only require information or a certain clarification to be provided to the claimant. If there are recurring complaints that have been previously received and addressed by the Project, DGDC will reconsider elevating the importance of the complaint, as this might be a sign that the response to the grievance has been insufficient or inadequate);

c. **Medium Risk** (e.g. claims that require resolution and are related to minor risks associated with health, the environment, construction, transportation, and external stakeholders. Although important, they do not pose an immediate risk); and

d. **High Risk** (e.g. claims related to the security and safety of the community stakeholders, as well of those that, according to criteria of the Community Relations team, require immediate response as the claim poses an immediate major health and safety risk or a risk to an individual, to a large or small group or several groups of stakeholders. This includes claims regarding illegal and abusive activities).

3. The CLO will prepare the Communication Report that includes the information listed below:

a. Internal tracking folio number provided to the claimant;

b. Type of feedback,

c. Area potentially involved;

d. Claimant's information (In case the grievance is not anonymous);

e. Date the complaint or suggestion was originated;

f. Grievance Risk Category (Low, Medium or High);

g. Brief description of the complaint or suggestion;

h. Area responsible for monitoring and solution;

i. Recommended solution; and

j. Term of resolution.

Once the claim has been reviewed, the investigation must be carried out in the first instance by the CLO. In case the feedback transcends and involves more areas of the Project, the suggestions and/or complaints will also be channeled to the Project Manager and the HR Manager, as appropriate, to coordinate resolution with the departments involved, depending on the scope of each, and to determine the actions to follow.

Regardless of the categorization of the claim, the claimant must always be informed that her or his grievance has been received and it is being investigated. The answer must be given in written and/or verbal

form, in a clear and precise language, preferably respecting the claimant's language. In cases where the complaint is anonymous, the response will be published at the Project's Community Relations Office/Community Centre. The deadline for the resolution of a complaint or claim is according to the categories is presented in the table above.

In high-risk situations, where there is a possibility of serious danger (e.g., death, sexual harassment), DGDC will consider involving other member teams to weigh in on the resolution strategy. In these type of cases, an alternative timeline will be established for addressing and involving third parties as needed, such as police and hospitals. The Project will always protect the confidentiality of the claimant. The special procedure for High Risk Claims is described below.

1. The claim enters an expedited process for investigation and resolution by the CLO and if applicable, the Major Investigation Team, when appropriate.
2. The Major Investigation Team initiates the investigation immediately and coordinates with local authorities to appropriately address the matter for claims related to allegations of illegal or abusive acts.
3. The CLO meets the claimant to gather additional information as necessary. Subsequently, he or she investigates the claim (e.g., meets with members of the security team involved in the claim), develops, and implements corrective actions in collaboration with other project staff, as necessary.
4. If both the CLO and other staff involved in the resolution of the claim are all the same gender, and the claimant prefers to speak to a person of his or her same gender, DGDC will facilitate this request. This option will be disseminated when disclosing the procedure. If additional investigations are needed, these are promptly undertaken.

The CLO will log the receipt of a comment, formally acknowledge it, track progress on its investigation and resolution, and respond in writing with feedback to the aggrieved party. They will initiate the investigation and ensure its speedy conclusion aiming to provide a response with ten (10) working days, unless there are exceptional circumstances. If the Project receives a large number of unsubstantiated grievances, the process will be reviewed to define instances when no response is needed.

If the person responsible of the claim is not able to obtain a resolution within 10 days of the reception of the claim, he or she submits the claim to the CLO, who notifies and seeks advice from the H&S Manager.

Where investigations are required, Project staff and outside authorities as appropriate will assist with the process. The CLO will collaborate with GoCD to identify an appropriate investigation team with the correct skills to review the issue raised and to decide whether it is Project related or whether it is more appropriately addressed by a relevant authority outside the Project.

The investigation will also aim to identify whether the incident leading to the grievance is a singular occurrence or likely to reoccur. Identifying and implementing activities, procedures, equipment and training to address and prevent reoccurrence will be part of the investigation activities. In some cases, it will be appropriate for the CLO to follow up at a later date to see if the person or organization is satisfied with the resolution or remedial actions.

Before the final resolution is issued, the agreed resolution will be reviewed by the claimant, or his or her worker representative, and will confirm his or her agreement with the solution proposed.

11.3.3.3 Resolution

Once the complaints have been categorized and reviewed, the resolution and closure process will unfold as follows:

1. The first step for the resolution is the determination of the timeframe and its inclusion in the registration file previously elaborated.
2. The claim will be discussed by the CLO, and if necessary, the managers of the areas involved. In the case of complaints related to allegations of illegal or abusive acts, the Project will immediately initiate the investigation to adequately address the matter. Based on the investigation, the complaint may or may not proceed.
3. Depending on the risk category, the approach will be defined. The CLO, together with a representative of the Legal Area will evaluate and determine the origin of the complaint and define the measures to be taken in response. All responses must be signed by the ESG Manager before being communicated to the employee and/or interested parties.
4. If the complaint is not admissible, the claimant will be notified.
5. The CLO and the Managing Director will have performed an analysis of all the viable resolutions, seeking to, at all times, provide solutions that respond to the claimant, from a position of dialogue and respect. A complaint will be dismissed only when all the instances of solution have been exhausted, explaining in writing to the claimant, in a clear and indubitable manner, the reasons for the refusal on the resolution of the complaint.
6. All documentation issued during the process by the company to interested parties must be sent by email or written notification. In any case, the answer must have the corresponding record (the folio of complaint or suggestion) and will be properly archived as part of the process.

11.3.3.4 Right to Appeal

If an external stakeholder who is not satisfied with the procedure or resolution, she or he can contest DGDC's decision. The claimant will have a maximum period of fifteen (15) business days to express any disagreement with the response and appeal it. Once the deadline has elapsed and there are no new grounds for complaint, the process will be considered closed.

In the event that a claimant wishes to challenge/appeal DGDC's decision or propose a counter offer, the Board of Directors will decide whether DGDC can resolve the dispute or it is necessary to involve a third party (e.g. a mediator, technical expert, local authority, or ombudsman) to reach an agreement between the parties and resolve the dispute. The claimant will always have the right to seek other legal or administrative resources. The last resort will be the national judicial process.

When a resolution agreement is established, both parties, the Head of Safeguards acting as the representative of DGDC and the claimant, will sign it in writing. Once the solution is implemented, both parties in recognition of compliance with the agreement will sign a compliance agreement again.

11.3.3.5 Evaluation and Follow Up

It is the responsibility of the CLO to follow up on all responses to suggestions and/or complaints in written and/or verbal form, especially those of medium and high priority, so as to confirm that the response given to the interest group was adequate, given the circumstances and criteria applicable at the time of filing the complaint. The External GM Database is used to follow up each claim until is resolved and closed. Both a grievance and commitments register is kept by DGDC.

11.4 Confidentiality and Protection from Retaliation

The Project is committed to protecting the identity of claimants and anyone else involved in the claim, and to handling personal information in accordance with legal requirements. This duty extends to all employees

and representatives of DGDC, its contractors and community members who participate in the External Grievance Mechanism process.

Information about a claim is shared within the company on a need-to-know basis and only to the extent necessary to complete the steps in this directive. DGDC will not share personal information with third parties unless required by law or authorized by the claimant.

When a claim relates to a specific DGDC or contractor employee, that person cannot play a role in the External Grievance Mechanism process in order to prevent conflicts of interest.

DGDC does not tolerate retaliation against claimants, be they an employee, contractor or external stakeholder. When concerns about retaliation are raised, Human Resources/ CLO is responsible for leading an investigation into the alleged retaliation under DGDC's Human Resources Policy and Code of Conduct.

11.5 Documentation and Monitoring

Weekly during construction and bi-annually during operation, the CLO will send the External GM Database to the Project Manager with information on the feedback received through a consolidated report showing the status of each claim and its indicators, removing identification information to protect the confidentiality of the complainant and guaranteeing anonymity.

This plan will be monitored continuously and is designed to facilitate the integration of lessons learned during its execution. The Project will be able to respond adequately to situations as soon as they develop.

The External Grievance Mechanism Plan will be reviewed annually, however, if required, the mechanism could be updated as necessary. It will also ensure that contractors update their procedures at least once a year.

11.6 Key Performance Indicators

The table below present the key performance indicators that will evaluate the implementation of this plan:

Table 11-4: Key Performance Indicators

Impact	Indicator	Performance Goals/ KPIs	Method/Tool/ Frequency
GM attainment	DGDC will review the External Grievance Database, including complaints closed and those unresolved. Number of grievances received per month versus number of grievances resolved.	100% of grievances resolved in a timely manner	External Grievance Mechanism Database and Community Relations Team / Quarterly
GM time efficiency	DGDC will review the External Grievance Database, especially the number of days between the grievances submission until its resolution and closure to calculate the average length of time needed to resolve grievances.	Max. 10 days	External Grievance Mechanism Database and Community Relations Team / Quarterly
GM Focus/ Risk Areas	DGDC will review the External Grievance Database and if necessary talk to the Community Relations Team to breakdown the grievances topics (e.g. health, safety, etc.) and grievance source	Resolve 100% of grievances from all sources and about all topics. Disseminate information regarding the different solutions when there are recurrent	External Grievance Mechanism Database and Community Relations Team / Quarterly

Impact	Indicator	Performance Goals/ KPIs	Method/Tool/ Frequency
		complaints in order to decrease recurrent grievances.	
Method of grievance reporting	DGDC will review the External Grievance Database and engage with community members to check the use and success of the different grievance reporting methods (e.g., number of grievances received by phone, at the office, website, and boxes).	100% of reporting methods will be functional and accessible at all times.	Community Relations Team / Quarterly
GM dissemination	DGDC will monitor all GM informational documents, meetings, and events where the GM was disclosed and explained to the affected communities.	GM dissemination of information in at least 70% of disclosure of information events, consultations and other activities.	Community Relations Team Records / Quarterly

12. MONITORING AND EVALUATION

12.1 Monitoring Objectives

Monitoring and evaluation are essential components of the RAP process. The objective is to provide feedback and to identify problems and successes as early as possible to allow for timely adjustment to implementation arrangements as needed. Monitoring and evaluation activities need to be integrated into the overall Project management process and a comprehensive monitoring plan that identifies the organizational responsibilities, methodology, and the schedule for monitoring and reporting must be developed for the RAP. For a full list of monitoring and evaluation objectives, see Appendix C.

The monitoring and evaluation process includes the following objectives:

- Monitoring of specific situations or difficulties arising from the implementation of the RAP or compliance with its objectives; and
- Evaluation of the mid- and long-term impacts of the RAP on affected households' livelihood, environment, local capacities, on economic development and settlement.

Monitoring aims to correct implementation methods during the course of the Project, as required, while evaluation is intended at checking whether policies have been complied with and provides lessons learnt for amending strategies from a longer-term

12.2 Monitoring Indicators

Monitoring will address the following aspects:

- Socioeconomic monitoring: follow-up of the welfare/status of the PAPs including regular survey of current income and cost of living, re-establishment of property, residence and livelihoods and other economic activities;
- Grievances and grievance management system including any issues to be resolved; and
- Assistance in livelihood restoration including any unforeseen costs/challenges such as transport or other costs.

The monitoring and evaluation measures put in place are designed to ensure that the implementation of the RAP is carried out in accordance with the relevant requirements of the WBG, IDB, CDB and IFC as well as national requirements.

Measuring progress and impacts related to the aspects described above would be based on the following indicators:

- Livelihoods would be measured through a quantitative income or expenditure survey;
- Use of capital will be reviewed via interviews and receipts to determine livelihood sustainability; and
- Qualitative indicators measuring perception and well-being of PAPs.

12.3 Monitoring Process

The DGDC Safeguards Specialist will undertake monitoring of the RAP implementation. Bi-monthly progress reports will be prepared for up to two years. The monitoring will consider the timeline of the process, outcomes of compensation/livelihood restoration and any other impacts that occur as part of the process. The RAP implementation schedule is shown in Table 12-1.

Table 12-1: RAP Implementation Schedule

TASKS	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8
Completion of RAP								
Approval of RAP/Community Consultation								
Implementation of RAP								
Payment of Compensation to PAPs								
DGDC Site Clearance								
Grievance Mechanisms and Procedures Implemented								
Construction Begins								
Performance Monitoring								
External Evaluations (up to two years)								

Monitoring will continue for up to two years and will focus on ensuring that the PAPs are not subject to undue hardship during the transition given that they are all considered to be vulnerable.

12.4 Evaluation Objectives

Evaluation is a key step to ensure that the RAP process is being completed in line with WBG / IFC policies. The evaluation of the RAP will have the following specific objectives:

- Assessment of the compliance of the implementation of resettlement, relocation and livelihood restoration activities with objectives and methods as set out in this RAP;
- Assessment of the compliance of the implementation of the RAP process with laws, regulations and safeguard policies as stated above;
- Assessment of compensation procedures as they have been implemented;
- Evaluation of the impact of the resettlement, relocation and livelihood restoration process on incomes and standard of living, with focus on the requirement that PAPs income are restored or improved; and
- Identification of actions to take to improve the positive impacts of the programme and mitigate its possible negative impacts, if any.

12.5 Evaluation Process

DGDC will use an independent consultant (Evaluator) to conduct an annual evaluation starting six months after implementation of the RAP to evaluate compliance with objectives, procedures, policies, laws and regulations. The Evaluator will be an independent consultant with experience in the conduct of resettlement and livelihood restoration planning. The Evaluator will be carefully chosen on the basis of hands on experience, no previous involvement in the Project, and proven ability to identify actions that improve implementation and mitigate negative impacts of economic displacement.

The RAP implementation will be evaluated against a number of key performance criteria, which will be identified by the Evaluator and DGDC based on consultation conducted to date with the community. These criteria will likely include access to employment, income, food security livelihood restoration and enterprise, and health and nutrition. The grievance management system will also be evaluated for its effectiveness. This evaluation will also verify that compensation payments have been made as promised, have been properly processed, and recommendations are being implemented. The schedule for independent evaluation of RAP implementation is six months following completion of RAP implementation. The evaluation will be repeated each year for 2 years.

13. BUDGET AND SCHEDULE

It is essential that all costs be estimated carefully and included in the detailed RAP budget. DGDC have itemized resettlement costs by categories of impact, additional entitlements and other resettlement expenditures including training, coordination, and monitoring. The results are presented in a tabular form below that illustrates expenditures over the life of the Project. Costs included are:

- Resettlement plan preparation consultancy;
- Cash compensation for land;
- Cash compensation for crops, trees, or livestock;
- Compensation for structures;
- Livelihood restoration measure costs;
- Conflict resolution; and
- Monitoring, evaluation and auditing costs.

The estimated RAP budget is presented in Table 13-1. These costs are indicative and consultant fees will need to be verified.

Table 13-1: Estimated RAP Budget

ITEM	Description	COST USD*
1	Land Acquisition Compensation	662,811
2	Structural Compensation	47,295
3	Tree/Crop Compensation	27511
4.	Livelihood Restoration	100,000
5	Vulnerable Assistance (1 year)	10,000[10]
Sub-total		***847,617***
6	Program Development, Management and Grievances	2,000
7	Community Consultation and Engagement	4,000
8	External Evaluation	10,000 (2 years)
Sub-total		***16,000***
TOTAL		***863,617***

**USD Conversion Rates based upon exchange rate of 1 ECD =0.37 USD as of December 2020*

[10] Estimated as some vulnerable owners wouldn't declare income.

14. REFERENCES

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World Bank Group (2001) Involuntary Resettlement Policy Operational Policy (OP) 4.12

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Central Intelligence Agency World Factbook Website (2017). [Accessed at https://www.cia.gov/library/publications/the-world-factbook/geos/do.html in April 2018]

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APPENDIX A ASSETS INVENTORY – PHYSICAL STRUCTURES

Figure A-1: Potential Residential Structure (currently Goat/Sheep Shed) A1

Figure A-2: Rabbit Hutch Structure A2

Figure A-3: Residential Structure B1

Figure A-4: Residential Structure Incomplete C3

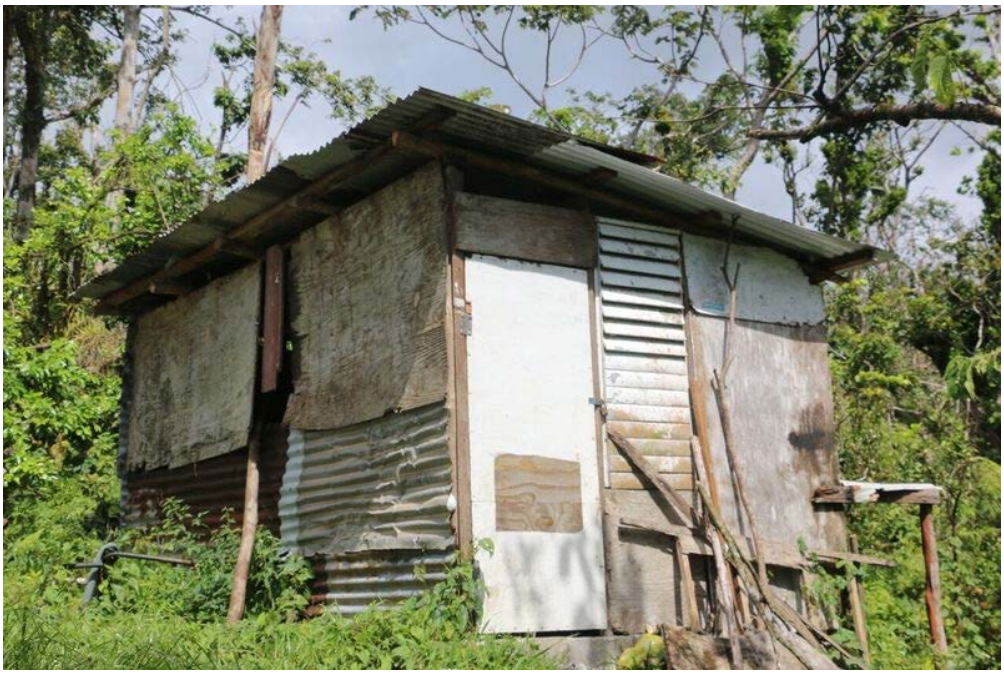

Figure A-5: Shed C3

APPENDIX B BASIS OF VALUATION

Lands

Lands are valued at replacement cost by the Property Valuations Unit (PVU) of the Department of Lands & Surveys using the following approach:

Market Value + transactions cost

Market Value is defined as 'the estimated amount for which an asset or liability should exchange on the valuation date between a willing buyer and a willing seller in an arm's length transaction after property marketing and where the parties had each acted knowledgeably, prudently and without compulsion'.

- Each property is seen as unique;
- Inspection of each property is done and evaluated using the following factors:
  - Services;
  - Access;
  - Topography;
  - Land use;
  - Market (supply & demand); and
  - Size.

Transaction Cost include all fees and costs associated with the transaction. These include:

- Assurance Fund – 1%
- Judicial Fee – $2^{1/2}$ %
- Stamp Duty – 4%
- Solicitor's Fees – 3%
- Vendor's Fees – 3%

In instances where properties are acquired by the Government, provision is made in the Land Acquisition Surveyors fees and other costs incurred are also paid.

Structures

The valuation of structures is driven by the market. Given that underdeveloped nature of market forces in Dominica, the PVU uses a 'cost of construction' approach. A full inspection of the structure is done by experienced officers of the unit and the following factors taken into account:

- Age of structure;
- Quality of finishing; and
- Type of structure i.e. intended use and materials used in construction.

Present rates used by the PVU range from EC$250-$275 per square foot. Straight line depreciation (age of building/anticipated life) is applied.

Crops

Crop valuation is done by officers of the Extension Unit of the Ministry of Agriculture using a combination of the following:

- Cost of Production of a crop;
- Selling price at time of valuation; and
- Bearing Capacity.

Therefore:

- Cost of Production

An assessment is done to ascertain what stage in the production cycle the affected crops are at and known costs are apportioned based on field size and location. Activities include land clearing, ploughing and hoeing, planting, weed control & fertilising, pest and disease management, transportation, harvesting, and marketing. This method is best employed when farm records exist.

- Selling Price at time of valuation

Where insufficient records exist, crops are valued at a reasonable/average selling price of the finished product at the time of valuation.

- Bearing Capacity

In addition to costs of production, the valuation considers the number of years/cycles for which the farmer could have reasonably expected to gain returns from the current crop. This is method is also used for the valuation of livestock.

APPENDIX C COMPLETION AUDIT TABLE OF CONTENTS

1. Executive Summary: Concise summary of resettlement undertaken to date, need for any on-going resettlement, magnitude of displacement, activities undertaken, grievances and key issues addressed, outstanding and on-going monitoring and evaluation processes and key recommendations.
2. Background: A brief description of the monitoring process to date covering the project and impacted communities, magnitude of displacement, key resettlement and livelihood impacts, legal framework, eligibility criteria and entitlement framework, timing of the various components of physical and economic displacement undertaken, resettlement and/or livelihood restoration activities and compensation provided and major or outstanding issues or grievances.
3. Review Objectives: Outline of the main objectives of the resettlement and/or livelihood restoration plan and a summary of studies and activities undertaken in support of resettlement implementation and livelihood restoration (e.g., preliminary and on-going consultation, stakeholder mapping and census surveys, asset surveys, socio-economic baseline studies, participatory planning meetings, site selection studies, organizational structures for implementation), and assessment of the process and evaluation of the outcome (including any participatory monitoring and evaluation methodologies used).
4. Key Findings: Issues to be considered may include, among others:
    a. Extent of public information and consultation in advance of land acquisition, and adequacy of ongoing consultation;
    b. Types of compensation provided and adequacy of that compensation (e.g., sufficient to cover replacement costs of lost assets, housing conditions, compensation/entitlements, income restoration and livelihood sustainability measures);
    c. Level of participation of affected people in decisions regarding compensation rates, location of new resettlement sites and options for livelihood restoration;
    d. Adequacy of replacement housing in terms of physical structure, location, and access to resources and services (such as health, education, water and sanitation, transportation, social and medical security, agricultural and pastoral land, employment opportunities and training and community development initiatives);
    e. Effectiveness of livelihood restoration measures;
    f. Integration into host communities;
    g. Impact on cultural property;
    h. Measures taken to protect (affected) vulnerable persons and groups;
    i. Adequacy of the grievance redress process and outcomes; and
    j. Monitoring and evaluation process and outcomes.
5. Conclusion and Key Recommendations/Corrective Actions: Concise summary of conclusions and recommendations, and for any gaps or outstanding issues, provide a proposed time bound Corrective Action Plan with Key Actions, dedicated Human Resources, proposed Timeline for closeout and a Budget.