

NEVLEC Geothermal: Resettlement Action Plan Update

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List of Acronyms

CDB	Caribbean Development Bank
EGC	Evans Global Consulting
ERM	Environmental Resource Management
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESRP	Environmental and Social Review Procedures
ESS	Environmental and Social Standards
IDB	Inter-American Development Bank
IFC	International Finance Corporation
MPW	Ministry of Public Works
NEVLEC	Nevis Electricity Company Limited
NHLDC	Nevis Housing and Land Development Corporation
NIA	Nevis Island Administration
NLAO	Nevis Land Acquisition Ordinance
OP	Operational Policy
P&A	Plug and Abandonment
PAP(s)	Project-affected Person(s)
PS	Performance Standard
RAP	Resettlement Action Plan
SEF	Sustainable Energy Facility
WBG	World Bank Group

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1. Introduction

1.1 Document Version Background

The scope of this work was to update certain sections of the previous Resettlement Action Plan (RAP) prepared by Environmental Resources Management (ERM) in 2025 (see Annex A). These sections include Chapter 3 (Identification of Project Impacts), Chapter 4 (Eligibility and Entitlement), and Chapter 5 (Asset Valuation). While small changes to other sections were made for consistency with the updates provided by Evans Global Consulting (EGC), the content of those sections remains largely unchanged from the original content produced by ERM as the scope agreed with Inter-American Development Bank (IDB) and Caribbean Development Bank (CDB) and EGC was such that the accuracy of those sections was presumed to be sufficient.

1.2 Project Background

Nevis Electricity Company Limited (NEVLEC) is planning a Geothermal Project (the ‘Project’) at Hamilton Estate, which is government-owned land. The Hamilton Estate property is located on the southwestern side of Nevis Island. The Project began by clearing and grading secondary vegetation in the well pads and laydown areas, leaving a secondary vegetated buffer around the production well pad and north of the site. Adjacent to the Hamilton Estate are farms and private land, but the developmental environment is largely rural with low population density. The Project infrastructure and parcels to be acquired are depicted in Figure 1-1 and further below in Figure 3-1. Note: in this version for public disclosure, the landowner’s name has been redacted from the figure below to protect their privacy.

Figure 1-1: Project Location Showing Access Road



The IDB is supporting the development of the Project (production and reinjection wells) through the Sustainable Energy Facility programme, which is executed by the CDB.

In preparation for commencement of the Project, a technical assessment was commissioned by NEVLEC of the existing slimhole wells at the Project site. The results of this assessment recommended the plug and abandonment (P&A) of slimhole well N-4. Consequent to this, the P&A of well N-4 was included in the scope of works for the Project, which will include the supply of the necessary goods and services for drilling five large diameter geothermal wells (1 vertical and 4 directional) during Phase 1.

An Environmental and Social Impact Assessment (ESIA) and the Environmental and Social Management Plan (ESMP) was prepared by Environmental Resources Management (ERM) in October 2022 to address the original scope of the Project. To address the expanded scope to include the P&A (decommissioning) of Slimhole well N-4 (hereafter 'N-4'), ERM updated the ESIA/ESMP in November 2024 to reflect the environmental, social and health and safety impacts, risks, hazards and associated mitigation measures relevant to the P&A activities of

N-4. Additionally, while not confirmed as part of the expanded Project scope, the new ESIA/ESMP included a well-head change of slimhole well N-3 to address potential risks and impacts and propose mitigation measures.

In total, the land to be immediately acquired for the geothermal project consists of 4.5 hectares of Crown Lands, and 1.2 hectares of private lands (addressed in this RAP). The Project also plans to acquire additional 3.2 hectares of land (not considered in this RAP) around NEVLEC's future planned power plant.¹ The land will be used to build a well pad for three new exploration wells (N-5, N-6 and N-7) at the east of the property, two injection wells (I-1 and I-2) at the southwest corner of the site, and a laydown area. See Figure 1-1 above and Figure 3-1 further below.

An updated assessment of land acquisition and resettlement impacts for Phase 1 (geothermal lands) is therefore required. Such is the purpose of this RAP.

1.3 RAP Purpose, Scope, and Approach

This updated RAP has been developed to assess and manage the land acquisition and resettlement process necessary for Phase 1 of the Project's implementation. The RAP aims to ensure fair and transparent compensation, minimize adverse impacts on affected individuals, and facilitate livelihood restoration in line with international standards and local regulations.

The RAP covers three land parcels belonging to one extended family, the acquisition of which is essential for the development of the geothermal Project, as they will accommodate key infrastructure necessary for its operation. It is imperative that all parcels are secured and made available prior to the commencement of any contractor activities on site.

Three parcels are required to house the drilling rig and its associated equipment, ensuring the proper setup for geothermal exploration and extraction.

The original RAP produced by ERM in June 2025 (Annex A) consisted of a desktop review of Project information and a site visit from January 21 to 24, 2025. During the site visit, ERM conducted interviews with Nevis Housing and Land Development Corporation (NHLDC), NEVLEC, and the owners of the affected parcels (the Project-affected People [PAPs]). In 2026, EGC was contracted to update the information provided in the original RAP (ERM

¹ This 3.2 hectares includes a parcel belonging to an additional PAP. In earlier versions of this RAP, this parcel was going to be acquired; however, in July 2026 a decision was made to defer this acquisition. Therefore, this information was removed from this RAP and the individual with power of attorney over this parcel scheduled to be informed.

2025). This update consisted of desktop review of Project documentation and a site visit in April 2026 to conduct additional consultations with PAPs. An additional round of remote consultations was held with PAPs in May and June 2026. These consultations were facilitated in-person by Nevis-based consultant Caribbean Architects and Planners Ltd. (hereafter 'Caribbean Architects'), with remote oversight by EGC. Based on these findings, this RAP does the following:

- Establishes the legal and guidance framework for managing displacement impacts, including national and international requirements.
- Establishes the grievance and redress mechanism.
- Identifies all anticipated Project impacts.
- Presents eligibility criteria for compensation and restoration measures.
- Provides evaluative criteria for the assessment of replacement land and structure options based on PAP engagement.
- Outlines process and outcomes of negotiations with PAPs.
- Details compensation payment and resettlement procedures.
- Establishes requirements for monitoring and evaluation.
- Establishes an estimated RAP implementation budget.

EGC will also produce an implementation plan following approval of this RAP and conclusion of negotiations with the PAPs. This implementation will:

- Lay out the steps and timelines for implementation including payments, rental provisions (if applicable), construction timelines, and provisions for monitoring and evaluation.
- Confirm the roles and responsibilities regarding the implementation process.

Once implementation is complete, EGC will produce a RAP completion report which:

- Confirms details of implementation, including all financial and in-kind compensation provided.
- Presents initial results of internal monitoring against criteria established in the RAP.
- Makes recommendations for any gap-fill measures or outstanding issues to be addressed.

1.4 Structure of the RAP

The content of this document is as follows:

- Section 1: Introduction

- Section 2: Legal and Institutional Framework
- Section 3: Identification of Project Impacts
- Section 4: Eligibility and Entitlements
- Section 5: Asset Valuation
- Section 6: Stakeholder Engagement and Socioeconomic Baseline
- Section 7: Land Acquisition and Resettlement Process
- Section 8: Roles and Responsibilities
- Section 9: Grievance Management Process
- Section 10: Monitoring and Evaluation
- Section 11: Estimated Resettlement Budget
- Section 12: References

It is critical to note that this RAP does not constitute legal advice. Its purpose is to layout the safeguards applicable to the Project and the details of consultations with PAPs. It is the sole responsibility of the Project's legal team to determine the precise terms of any legal documentation or agreement, in alignment with national laws as well as the expectations of the safeguards outlined in this document.

2. Legal and Institutional Framework

2.1 Introduction

The Project is required to meet nationally and internationally accepted environmental and social safeguard standards to ensure that community benefits from the Project are maximised, and that potential adverse environmental and social impacts are minimised. Section 2.2 below summarizes relevant national and international requirements. As shown in the comparative table in Section 2.4, where 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 Nevis Island Administration (NIA) and then be granted to NEVLEC for use. Therefore, as outlined in Chapter 9, the NIA is the primary proponent of the resettlement with NEVLEC playing a supporting role.

2.2 National Requirements

Nevis's national laws and regulations provide the relevant instruments for the effective management of land acquisition and proper institutional coordination. Of primary relevance are the Nevis Land Acquisition Act and the Nevis Land Acquisition Ordinance (NLAO), the latter of which clearly outlines procedures for acquiring private lands for state use.

The NLAO includes a description of the process for land acquisition including expropriation (compulsory land acquisition) and how compensation should be determined. The general process of compulsory land acquisition described by Part II of the NLAO consists of the following steps:

- **Identification of Land for Public Use:** The government identifies land necessary for public purposes, such as infrastructure projects, utilities, or other public development.
- **Notification of Intent:** The government issues a formal notification to the landowner(s), informing them of the intention to acquire the land. This notification includes details of the land, the purpose of the acquisition, and the general timeline.
- **Valuation of the Land:** A valuation of the land is conducted to determine its fair market value. This is typically done by a qualified land surveyor or appraiser.
- **Offer of Compensation:** Based on the valuation, the government makes a compensation offer to the landowner. This compensation is meant to reflect the market value of the land being acquired, including potential losses incurred by the landowner.

- **Agreement and Negotiation:** The landowner has the opportunity to accept the compensation offer or negotiate for a higher amount. If an agreement is reached, the acquisition process moves forward.
- **Appeal Process:** The landowner has the right to appeal the acquisition decision, or the amount of compensation offered. Disputes regarding compensation can be taken to a tribunal or court for resolution.
- **Compulsory Acquisition (if necessary):** If the landowner refuses to accept the compensation or negotiate, the government may proceed with compulsory acquisition. This involves a formal legal process, where the government takes ownership of the land, often with the assistance of the courts.
- **Final Transfer of Ownership:** Once all issues are resolved, including payment of compensation and the conclusion of any legal disputes, ownership of the land is formally transferred to the government. The transfer is registered with the Land Registry.
- **Public Use and Development:** After acquisition, the land is used for the intended public purpose, and development or construction begins.

2.3 International Requirements

A number of international standards outline requirements governing involuntary land acquisition (also referred to as ‘involuntary resettlement’). Resettlement is considered involuntary when, under national laws, a project has recourse to expropriation (compulsory acquisition) of required lands should good-faith negotiations with the landowners fail. Typically, this is the case where a project is deemed to be in the ‘public interest’ (i.e., a development project). As affected individuals or communities do not ultimately have the right to refuse land acquisition or restrictions on land use in these situations, the resettlement is considered involuntary (even if the Project engages in good faith negotiations and ultimately acquires the land without recourse to compulsory acquisition).

Relevant international requirements governing involuntary land acquisition are:

- World Bank Group (WBG) Operational Policy (OP) 4.12
- WBG Environmental and Social Standards (ESS)
- IDB Operational Policy OP-710
- CDB Environmental and Social Review Procedures (ESRP)
- International Finance Corporation (IFC) Performance Standards (PS)

These are described below.

2.3.1 WBG OP 4.12 on 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 WBG'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 and indirect economic and social impacts that result from WBG investment projects and are caused by:

- The involuntary acquisition of land resulting in physical displacement (i.e. loss of shelter)
- Loss of assets or access to assets including natural resources and / or loss of or interruption of income sources or means of livelihoods constituting economic displacement

2.3.2 IFC PS5

The IFC PS² provide internationally recognized standards for a range of environmental and social risks and set requirements for environmental and social impact management including resettlement. The most relevant of these for this RAP document is IFC PS5: Land Acquisition and Involuntary Resettlement.

IFC PS5 seeks to provide a framework for responsible and transparent management of physical and economic displacement. This standard defines different types of involuntary resettlement, explains the need for negotiated settlements (as opposed to expropriation),

2 IFC Performance Standards (2012); available at: https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance-Standards

highlights the requirement to improve living conditions at resettlement sites, and outlines different approaches replacing collective assets and compensation entitlements. The main objective of PS5 is to avoid or at least minimize involuntary physical and economic resettlement wherever possible.

If resettlement cannot be avoided, a Project must:

- Minimize displacement by exploring alternative project designs.
- Avoid forced evictions.
- Anticipate, avoid, and minimize adverse social and/or economic impacts from land acquisition or restrictions on land use.
- Improve, or restore, the living conditions, livelihoods, and standards of living of displaced persons.
- Provide security of tenure.
- Provide compensation for loss of assets at full replacement cost: the value of assets and property must not be depreciated and should include all taxes.
- Favour land based / in-kind replacement over cash transactions.
- Ensure that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected.
- Recognize all affected people (i.e., those with and without legal rights, traditional, and customary rights).
- Provide special assistance/plans for 'vulnerable' people.
- Consider impacts to host community (if relevant).

2.3.3 IDB OP-710

The IDB's OP-710 also covers involuntary resettlement. It sets out two fundamental principles:

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

The resettlement plan has 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 apply to the design and appraisal of the resettlement plan:

- **Baseline Information:** Accurate baseline data should be compiled early, including the number of people to be resettled and their socio-economic and cultural characteristics, disaggregated by gender. This data will help define eligibility criteria, compensation, and rehabilitation needs.
- **Community Participation:** The resettlement plan will involve consultations with a representative cross-section of displaced and host communities. Consultations will occur during the design phase and continue throughout implementation and monitoring. Special attention will be given to vulnerable subgroups to ensure their interests are represented.
- **Compensation and Rehabilitation Package:** Fair compensation and rehabilitation must be provided for lost assets, subsistence, income, and social networks. These measures should address intangible assets like social and cultural assets and customary land rights, especially for rural populations. Housing and services must meet minimum standards and be culturally appropriate.
- **Legal and Institutional Framework:** The resettlement plan should identify the legal and institutional context for implementing compensation and rehabilitation measures. This includes determining entitlements under applicable laws, assessing additional measures needed, and designing mechanisms for effective implementation and dispute resolution.
- **Environment:** Resettlement plans must consider environmental impacts, including infrastructure development, densification of host areas, and pressure on natural resources. If required, an environmental impact assessment will be conducted for relocation sites, and an environmental management plan will be included.³
- **Timeliness:** A preliminary resettlement plan should be prepared as part of the ESIA and undergo meaningful consultation with affected populations. The final plan will detail compensation and rehabilitation options, eligibility criteria, institutional arrangements, budget, execution timeline, consultation provisions, and monitoring and evaluation mechanisms.

³ Note: it is assumed that an environmental impact assessment will not be required for replacement lands, given that the lands to be provided / purchased are in all likelihood already zoned as residential.

- **Monitoring and Evaluation:** The resettlement component should be included in project progress reports and the logical framework. Monitoring will focus on social and economic conditions amongst the affected PAPs and use both qualitative and quantitative indicators.

2.3.4 CDB Environmental and Social Review Procedures (ESRP)

The CDB's ESRP covers Land Acquisition and Involuntary Resettlement. It sets out the following fundamental principles:

- Involuntary resettlement should be avoided or minimised where feasible.
- Re-settlement should be based on a Resettlement Plan Survey developed in consultation with the PAPs. The Plan elements should include; a description of project elements requiring land and defining the affected area, baseline socio-economic studies (in-line with international standards), a population census and inventory of assets, socio-economic characteristics including conditions of vulnerability of the PAP. It should clearly define where available relevant government procedures and a cut-off date for eligibility acceptable to the Bank.
- A RAP should be developed that will include a description of the assistance and compensation to be provided, compensation procedures, institutional responsibilities, an implementation plan, grievance redress mechanism, budget, and monitoring and reporting requirements. The census must include a cut-off date to discourage inflow of people who are ineligible.
- The criteria for compensation for land and other assets should be clear, standardised and transparent, based on replacement value at the time of relocation. Assets may not necessarily be economic and may have social and cultural value such as sacred sites or community structures.
- In addition to compensation, resettlement assistance should be provided, if necessary, to facilitate income restoration.
- Directly affected groups, including those receiving re-settled groups, (host populations), should benefit from the project, and be consulted on decisions that affect them, including selection of benefit options, development packages, and mitigation measures. Particular attention should be paid to ensuring the interests of both women and men, the elderly and handicapped have been fully taken into account.
- Income restoration should build on the experiences and preferences of displaced people, and benefits should be socially and culturally appropriate.

- Provisions should be made for culturally appropriate consultations (including gender), participation and grievance dispute redress mechanisms. These should also provide for effective dissemination of information, reasonable time schedule for public hearings and review, to allow opportunity for timely feedback from PAP.
- The full costs of resettlement activities necessary to achieve the objectives of the project are included in the total costs of the project. The costs of resettlement, like the costs of other project activities, are treated as a charge against the economic benefits of the project, and any net benefits to the PAP are added to the benefits stream of the project.
- The project is responsible for adequate monitoring and evaluation of the activities contained in the resettlement instrument (resettlement plan/policy framework). The Bank may choose to help to supervise resettlement implementation to determine compliance with the instrument. Upon completion of the project, the project undertakes an assessment to determine whether the objectives of the instrument have been achieved. If the assessment reveals that these objectives may not be realised, the project should propose follow up measures that may serve as the basis for continued Bank supervision, as the Bank deems appropriate.
- The project is required to guarantee that PAPs receive the promised compensation packages ahead of project implementation, including the clearing of rights-of-way.

2.4 Gap Analysis

The following section presents a gap analysis between the NLAO and applicable international resettlement frameworks mentioned above. This analysis identifies several significant areas where the NLAO falls short in addressing the comprehensive needs of affected persons and communities. The key gaps include inadequate provisions for livelihood restoration, support for displaced persons, consultation and participation, monitoring and evaluation, and the absence of a formal grievance mechanism. These gaps are critical to ensuring a fair and transparent resettlement process that aligns with international best practices. The gap analysis is presented in Table 2.1 below.

Table 2-1: Gap Analysis of National and International Resettlement Regulations

Conflict/Gap	National Legal Framework	International Requirements	Measures to Address Conflict/Gap
Compensation and Livelihood Restoration	<i>Compensation:</i> Based on market value of land. Compensation is provided for land, buildings, crops, and any improvements on acquired land (NLAO, Section III). <i>Livelihood:</i> No provisions for livelihood restoration. The focus is on compensation for loss of property.	OP 4.12: <i>Compensation:</i> Requires compensation at full replacement cost, which includes market value plus any costs incurred by displaced persons (e.g., transaction costs, legal fees) (WB OP 4.12, Paragraph 6). <i>Livelihood:</i> Requires compensation for lost income and other non-market losses (e.g., cultural and social impacts). Livelihood restoration plans must be included for those impacted by land acquisition (WB OP 4.12, Paragraphs 15-17). IFC PS5: <i>Compensation:</i> Similar to OP 4.12, compensation should be at full replacement cost, including lost income, and non-market losses (IFC PS5, Paragraph 9). <i>Livelihood:</i> Emphasizes livelihood restoration and requires detailed livelihood restoration plans for displaced persons to ensure their economic activities are not negatively affected (IFC PS5, Paragraph 9). OP-710: <i>Compensation:</i> The compensation and	NLAO does not adequately address compensation for non-market losses or livelihood restoration, which is explicitly covered by all international standards (World Bank, IFC, IDB, and CDB) (OP 4.12, Paragraph 6; IFC PS5, Paragraph 7; IDB OP-710, Paragraph 9; CDB ESRP, Section 3.2). All PAPs are eligible for compensation at full replacement cost for lost assets including cash or land-based compensation, and as well as livelihood restoration plans that provide support for economic recovery and the restoration of community structures beyond physical property.

Conflict/Gap	National Legal Framework	International Requirements	Measures to Address Conflict/Gap
		rehabilitation package must take adequate account of intangible assets, especially nonmonetary social and cultural assets and, particularly in the case of rural populations, of customary rights to land and natural resources. (IDB OP-710, Section V, Paragraph 3.). <i>Livelihoods:</i> Mandates livelihood restoration measures for affected communities to support sustainable incomes and prevent long-term adverse impacts (IDB OP-710, Section V, Paragraph 3.). CDB: <i>Compensation:</i> Requires individuals to be compensated for the loss of land and other assets taken for development purposes. (CDB ESRP, Section 7.01). Assets may not necessarily be economic and may have social and cultural value such as sacred sites or community structures. (CDB ESRP, Section 7.02 (d)). <i>Livelihood:</i> Mandates that individuals affected must be able to restore their incomes and standards of living or improve them (CDB ESRP, Section 5.1).	
Support for displacement	No specific provisions for displaced individuals	OP 4.12: Displaced persons should be offered support after	NLAO lacks provisions for resettlement support or specific actions to aid

Conflict/Gap	National Legal Framework	International Requirements	Measures to Address Conflict/Gap
	beyond compensation for land value.	displacement, for a transition period, based on a reasonable estimate of the time likely to be needed to restore their livelihood and standards of living (WB OP- 4.12, Section 6 (i)). IFC PS5: Transitional support should be provided as necessary to all economically displaced persons, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living. (IFC PS5, Paragraph 29). OP-710: Requires specific actions for displaced persons, including provision of alternative housing and support for livelihood restoration. (IDB OP-710, Paragraph 3). CDB: Mandates that a RAP should be developed that will include a description of the assistance and compensation to be provided (CDB ESRP, Section 7.02 [c]).	displaced individuals beyond compensation for land value. International standards, particularly OP 4.12, IFC PS5, IDB OP-710, and CDB ESRP all provide for support beyond land compensation, including housing and livelihood restoration (OP 4.12, Paragraph 19; IFC PS5, Paragraphs 8-9; IDB OP-710, Paragraphs 10-12; CDB ESRP, Section 5.3). All PAPs will receive displacement and post displacement support such as transitional assistance or housing solutions, as appropriate to their situation.
Development assistance	Does not mention or require development assistance for displaced persons or communities.	OP 4.12: 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-	NLAO does not specifically address development assistance as part of the land acquisition process. International standards, especially OP 4.12, IFC PS5, IDB OP-710, and CDB

Conflict/Gap	National Legal Framework	International Requirements	Measures to Address Conflict/Gap
		displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher. (WB OP- 4.12, Section 2 (c)). IFC PS5: Includes assistance as part of the resettlement process, aiming to improve the livelihoods of displaced persons (IFC PS5, Paragraph 9). OP-710: Emphasize the importance of supporting displaced populations through various forms of assistance, including compensation, rehabilitation, community participation, and continuous monitoring and evaluation (IDB OP-710, Section V). CDB: In addition to compensation, resettlement assistance should be provided, if necessary, to facilitate income restoration. (CDB ESRP, Section 7.02 [e]).	ESRP, include provisions for such assistance as part of the resettlement package (OP 4.12, Paragraph 7; IFC PS5, Paragraph 10; IDB OP-710, Paragraph 16; CDB ESRP, Section 5.1). Where there are livelihoods impacts, all PAPs will 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.
Consultation and Participation	Notice is given to the landowner, with little emphasis on broader community consultation or participation in decision-making processes (NLAO, Section 2, paragraph 7).	OP 4.12: Strong emphasis on meaningful consultation with affected individuals and communities. Informed participation is a key principle, ensuring that stakeholders have a voice in the resettlement process (WB OP 4.12, Paragraph 14).	NLAO lacks a robust framework for consultation and participation. International standards (OP 4.12, IFC PS5, IDB OP-710, CDB ESRP) prioritize inclusive, transparent, and continuous consultation with all stakeholders, including resettled communities (NLAO, Section

Conflict/Gap	National Legal Framework	International Requirements	Measures to Address Conflict/Gap
		IFC PS5: Requires continuous, informed consultation with affected communities, particularly in identifying and addressing potential impacts. Transparency and participation are emphasized throughout the land acquisition process (IFC PS5, Paragraphs 8, 10). OP-710: Mandates consultation with affected persons and communities, ensuring that they are informed, and their interests are adequately represented (IDB OP-710, Paragraphs 2). CDB: Requires ongoing consultation and engagement with affected communities to ensure that their needs and concerns are addressed throughout the process (CDB ESRP, Section 7.02 (f) and (h)).	6; OP 4.12, Paragraph 14; IFC PS5, Paragraphs 8-9; IDB OP-710, Paragraphs 8-9; CDB ESRP, Section 5.2). All PAPs will be meaningfully consulted as part of the resettlement process, ensuring transparency, informed decision-making throughout the resettlement process and that their thoughts and opinions are taken into account in the process.
Timing for the Payment of Compensation and Taking possession of Land Acquired	Specific timelines for payment and taking possession are not clearly defined or enforced. Specific timelines for payment and taking possession are not clearly defined or enforced.	OP 4.12: Possession of the land acquired and related assets only after compensation has been previously paid in full. (WB OP 4.12, Paragraph 10). IFC PS5: Compensation must be provided before physical	NLAO does not specify that compensation must be paid before possession of land or displacement, unlike the international standards which emphasize timely payment to avoid adverse impacts on displaced persons (OP 4.12, Paragraph 6; IFC PS5, Paragraph 7; IDB OP-710, Paragraph 9; CDB ESRP,

Conflict/Gap	National Legal Framework	International Requirements	Measures to Address Conflict/Gap
		displacement occurs. This ensures that affected persons have the resources to secure alternative land or livelihoods before their property is taken (IFC PS5, Paragraph 7). OP-710: Emphasizes the importance of preparing a preliminary resettlement plan and ensuring that compensation and other measures are carried out in a timely manner (IDB OP-710, Section V). CDB: The Project is required to guarantee that affected people receive the promised compensation packages ahead of project implementation, including the clearing of rights-of-way (CDB ESRP, Section 7.02 (k)).	Section 3.2). International standards will take precedence. PAPs will receive compensation prior to displacement to allow affected persons to secure alternative livelihoods or land.
Monitoring and Evaluation	No explicit provisions for monitoring or evaluation of the land acquisition process or resettlement outcomes.	OP 4.12: Requires regular monitoring and evaluation of the resettlement process to ensure that objectives are being met, and that displaced persons are successfully integrated and compensated (WB OP 4.12, Paragraphs 23, 24). IFC PS5: Requires that monitoring and evaluation systems are in place to track progress and address any issues in the resettlement	NLAO does not have clear provisions for monitoring and evaluation, whereas international standards (OP 4.12, IFC PS5, IDB OP-710, CDB ESRP) require robust monitoring mechanisms to assess and adjust resettlement processes (NLAO, Section 6; OP 4.12, Paragraph 23; IFC PS5, Paragraph 15; IDB OP-710, Paragraph 14; CDB ESRP, Section 6.1). Monitoring and evaluation should be conducted to ensure compliance with the

Conflict/Gap	National Legal Framework	International Requirements	Measures to Address Conflict/Gap
		process (IFC PS5, Paragraph 15). OP-710: Requires that monitoring and evaluation systems be established to track the effectiveness of resettlement and livelihood restoration efforts (IDB OP-710, Paragraph 7). CDB: Requires that monitoring be conducted throughout the resettlement process, with regular assessments to ensure that resettlement objectives are being met (CDB ESRP, Section 7.02 (j)).	RAP and all international standards, and allow for corrective actions, if necessary.
Grievance Mechanism	No formal grievance mechanism is provided under NLAO. Except with the approval of the Governor-General acting in accordance with the advice of the Cabinet in any case in which he considers that injustice may otherwise be done, no claim for compensation shall be admitted or entertained unless the same shall be made within twelve months after the date on which entry has been made on the land. (NLAO, Paragraph 31).	OP 4.12: Requires the establishment of a grievance redress mechanism to allow affected persons to address concerns and disputes arising during the resettlement process (WB OP 4.12, Paragraphs 13, 14). IFC PS5: Requires a grievance mechanism to ensure that affected persons have an avenue to raise issues and resolve disputes promptly (IFC PS5, Paragraph 11). OP-710: Strongly emphasizes the establishment of a grievance mechanism to ensure that complaints	Nevis Land Acquisition Ordinance has a limited recourse to address issues during the resettlement process, while all international standards (OP 4.12, IFC PS5, IDB OP-710, CDB ESRP) include provisions for establishing robust grievance mechanisms (NLAO, Section 6; OP 4.12, Paragraph 21; IFC PS5, Paragraph 15; IDB OP-710, Paragraph 15; CDB ESRP, Section 5.4). All PAPs will be informed about the Project's Grievance Management System to ensure that affected individuals can raise and resolve issues effectively.

Conflict/Gap	National Legal Framework	International Requirements	Measures to Address Conflict/Gap
		are addressed and resolved effectively during the resettlement process (IDB OP-710, Paragraph 6). CDB: Requires the establishment of a grievance mechanism that allows affected persons to voice concerns and have them addressed during the resettlement process (CDB ESRP, Section 5.09, 7.02 (c)).	

3. Identification of Project Impacts

3.1 Loss of Assets and Physical Displacement

For the construction and execution of the Project, three parcels need to be permanently acquired as the drilling rig, along with all associated equipment and accessories, will be relocated to this site. A map of Project affected parcels is shown below in Figure 3-1. Table 3-1 further below illustrates the details of each affected asset. Note: in the figure below, landowner names have been redacted from this RAP version for public disclosure to protect their privacy.

Figure 3-1: Project Infrastructure and Affected Parcels

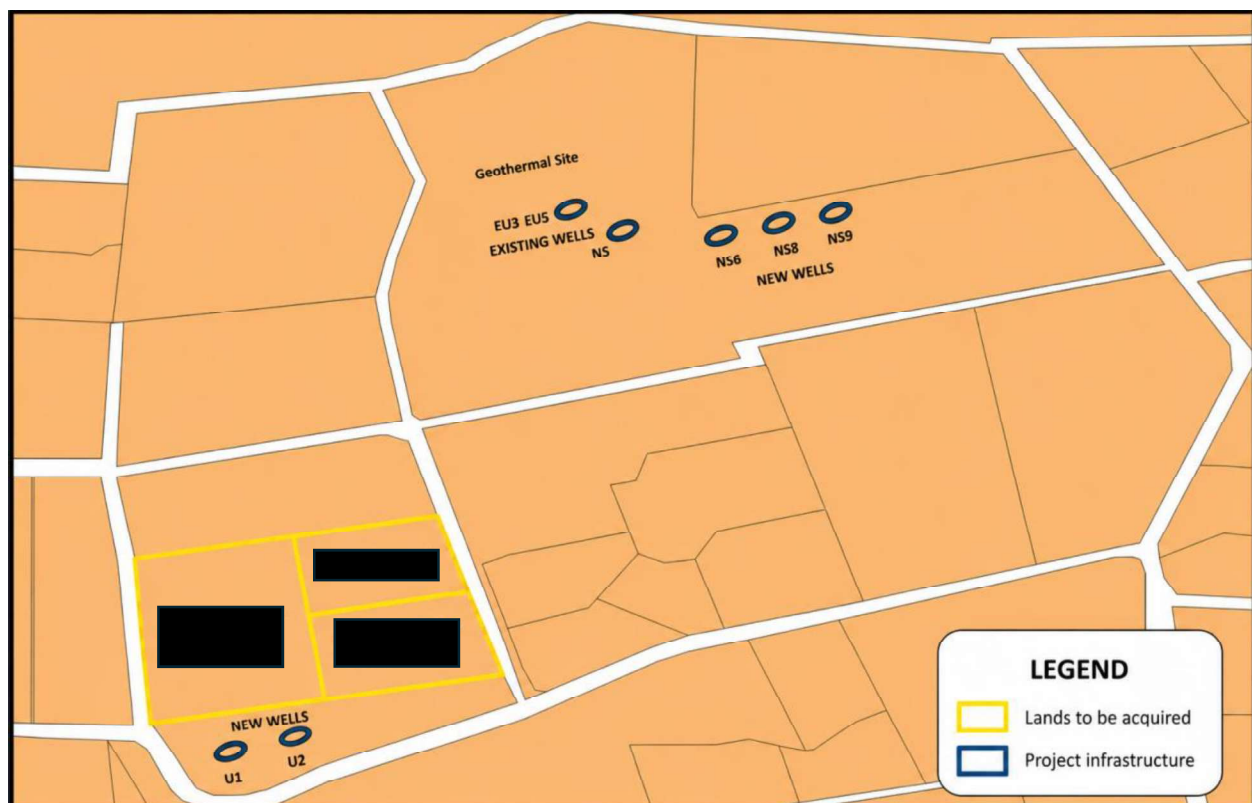


Table 3-1: Affected Assets and Corresponding PAPs

Parcel #	Details	Asset	Owner(s)	User / Occupant	Size
1	Register Book 46, Folio 124	Land	Redacted	Hosts the residential structure indicated below; otherwise not used for productive purposes. ⁵	32,616 square feet
		Residential Structure	Redacted	Four (4) occupants of residential structure	1,118 square feet
2	Register Book 14, Folio 42	Land	Redacted	N/A (land is wild bush; not used for productive purposes)	65,448 square feet
3	Register Book 55, Folio 46	Land	Redacted	N/A ⁸ (land is wild bush; not used for productive purposes)	32,616 square feet

3.2 Livelihood Impacts and Economic Displacement

As indicated above, the affected parcels are not being utilized for productive purposes, and no income is being made off the land; the lands themselves are wild bush, with no productive plants or trees present that are utilized by the PAPs as a means of livelihoods; however, two of the parcels have encumbrances upon them. The entitlements of the PAPs relating to the encumbrances on these parcels are discussed in Chapter 4.

3.3 Other Potential Displacement

A Project access road is also required to allow for the transportation of drilling equipment to site and back upon the completion of drilling. It was originally contemplated during EGC fieldwork that eight (8) properties alongside the road would have been affected by the paving of the access road; however, during the course of the drafting of this RAP, the Ministry of Public Works (MPW) determined that the road would be a compacted rather than

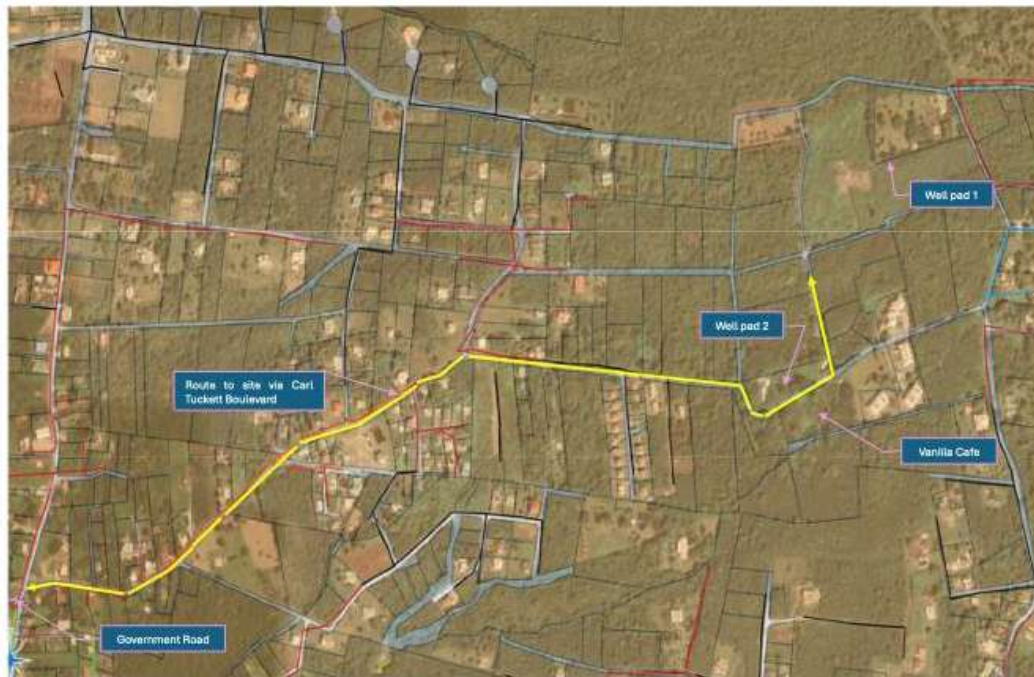
⁵ This property is associated with an encumbrance – see Annex B for details.

⁸ This property is associated with an encumbrance – see Annex B for details.

paved road; as such, there are no longer any impacts associated with the construction or operation of the access road. See Figure 1-1 above.

The other potential source of displacement is the temporary economic displacement of a café operating in vicinity to the Project works, as this café has an outdoor seating section, the business on which may be adversely affected by dust, noise, or vibrations associated with Project construction due to proximity to the alternate access route which may see heavy truck and vehicular traffic during the Project construction phase (see Figure 3-2). This is not currently anticipated; however, the Project will continue to engage with the owner before, during, and after the construction phase (as part of monitoring and evaluation) to ensure that any impacts are identified and mitigated appropriately.

Figure 3-2: Location of Café and Access Route



4. Eligibility and Entitlements

4.1 Overview

‘Entitlement’ refers to the amount and type of compensation (or other support) to be provided to a PAP for a particular impact or loss category. To determine entitlements, 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’ according to specific criteria. If eligible, the affected party is then a candidate and considered ‘entitled’ to an appropriate form of corresponding compensation. The following sections present the entitlements relevant to this Project.

4.2 Eligibility and Cut-off Date

Per the international standards outlined in Chapter 2, eligibility criteria define who and what is eligible for compensation under the Project’s entitlement matrix for compensation and restoration. Typically, persons, households, groups, or communities are considered eligible for compensation and / or restoration if they have a legitimate interest (ownership or productive use) in land or other immovable assets that were established (e.g., purchased, planted, managed, used, or constructed) in the land acquisition area prior to a Project cut-off date, and which are affected by Project activities. The concept of a cut-off date for this Project was socialized but not established by ERM in January 2025 and again by EGC in April 2026. The cut-off date was formally established by EGC and Caribbean Architects in a call with the PAPs on 29 May 2026 (see meeting minutes in Annex E). At this time, PAPs were informed that an updated valuation of all assets would be carried out the following week and that any changes made to the affected assets subsequent to this cut-off date including number of persons living in the affected residential structure would not be eligible for compensation. See Chapter 6 for additional details on engagement.

4.3 Compensation and Restoration Entitlements

PAPs are entitled to a combination of compensation measures, relocation, and livelihood assistance, depending on the nature and extent of the impact and lost assets and their preferences. Social and economic vulnerability was considered in determining the level of assistance provided. Any accommodations or considerations required beyond what is provided for in the formal offer (see Annex B) will be negotiated with the individual households.

To protect the privacy of the affected households, such a vulnerability analysis is not appropriate here (Annex B, which has been redacted from this publicly disclosed version of the RAP, contains relevant individual household details).

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

- Compensation for loss of land
- Compensation for the loss of structures
- Resettlement assistance
- Livelihood restoration assistance
- Additional support for identified vulnerability

A driving principle of this RAP and the international safeguards on which it is based is that all PAPs' standard of living and livelihoods will be restored to pre-displacement levels and, if possible, improved. Given that none of the PAPs have land-based livelihoods or are in any other way economically reliant on the parcels as a source of income, there are no impacts on livelihoods and thus no livelihoods restoration needs; however, as indicated previously, two of the affected parcels are being used as collateral. As the purchase of these parcels therefore has an economic impact on the PAPs, this loss is addressed in the compensation offer (see Annex B) although it does not constitute the PAPs' 'livelihoods' so to speak.

The following sections present the main categories of entitlements relevant to the losses associated with this project. The entitlement matrix presented below in Table 4-1 summarizes these details.

4.3.1 Compensation determinations for lost assets

PAPs were presented with the options of cash compensation at full replacement cost, in-kind replacement of assets, or a combination. Given that Nevis has an established real estate market, full replacement cost for assets in this case is market value plus payment of all associated administrative costs / fees.⁹ The following sections provide high-level details of the arrangements made with the PAPs; however, specific details of the compensation /

⁹ It is critical to note that full replacement cost as established in this RAP is the minimum expectation. The actual outcome of negotiations with the PAPs is presented in Annex B, which is redacted from this version of the RAP for privacy purposes. That being said, for future land acquisition needs, the expectation is that this 'framework' and the precedent set by the Project with the acquisition of the parcels covered in this RAP would be applied to all PAPs, meaning equivalent compensation would be provided to all PAPs with equivalent assets and eligibility. This is critical to avoid grievances and encourage the equivalent treatment of potentially vulnerable PAPS who may not have the capacity to self-advocate.

restoration offer are included in Annex B and redacted from the public version of this RAP to protect the privacy of the PAPs.

4.3.1.1 Loss of Residential Structure

For the affected house specifically, NIA is providing the PAPs with a replacement house that is equivalent in quality (size, finishes, attributes) to the house being acquired, while meeting minimum standards for decent living.¹⁰ NIA is also providing physically displaced PAPs with compensation for reasonable moving and storage costs (see Section 4.3.1.4) and assistance for the preparation of in-kind replacement land for its intended residential use.

Per the international safeguards outlined in Chapter 2, all compensation (including in-kind compensation) must be paid / provided outright prior to the acquisition and clearing of the land. Notwithstanding this, given the Project schedule (construction provisionally to begin in Q3 2026), there is one proposed modification to this requirement. This modification is that the physically displaced PAP has agreed to move into a temporary rental accommodation until the replacement residential structure is provided (approximately six months). International safeguards do allow for this possibility as the following conditions have been met: 1) the PAP has been consulted on and agrees to this arrangement; 2) the arrangement is for a defined period of time (i.e., it cannot be indefinite / open-ended); 3) the rental accommodations are of equivalent quality in terms of basic characteristics to the house being lost while still meeting minimum standards, and; 4) the PAP is provided with moving assistance for both the move to the rental as well as into the permanent replacement house, and assistance as necessary with temporary storage of personal belongings for the duration of the rental.

4.3.1.2 Loss of Residential Land

NIA is providing PAPs with replacement land on which to locate the new residential structure. These lands were identified by the PAPs as being functionally equivalent¹¹ to the lands from

¹⁰ The concept of 'minimum standards' varies from project area to project area; however, generally speaking, it means that housing has adequate protection from the elements, meets basic health and safety standards, has access to clean water (although not necessarily at the household level, depending on the context) and electricity, and adequate sanitation services. In Nevis, housing standards are established by the NHLDC and will also be followed for the PAPs' replacement residence. See Annex B for additional details of arrangements made.

¹¹ 'Equivalent' does not mean identical; per the safeguards, PAPs were entitled to opt for a smaller parcel of land that is more expensive (per square metre) than their existing parcel, as long as the ultimate value of the land is not lower than the parcel being acquired. Similarly, the PAP could opt to forego other advantages of the land (i.e., proximity to roads) in exchange for other benefits (proximity to family), within reason. The main principle here is that the PAP does not receive in-kind compensation that is less valuable, or significantly worse in terms of location or other attributes, than the parcel being acquired.

which they are being displaced. Key considerations for selection of replacement lands included secure land tenure as well as equal or improved location-based characteristics such as access to essential services and proximity to family, within reason.

4.3.1.3 *Loss of Land*

The lands owned by the PAP which do not have a residential purpose are being paid in cash, at a minimum of full replacement cost (see Annex B for actual compensation values). Additionally, as mentioned, there are encumbrances on two of the parcels. NIA has included in their compensation offer provisions to ensure that the PAPs will be able to clear the lands of these encumbrances prior to land acquisition.

4.3.1.4 *Other Allowances and Assistance*

In addition to the payment of all transaction, administrative, reasonable legal, and other fees incurred as part of the land acquisition transaction and encompassed under the concept of full replacement cost, NIA is also provided the physically displaced PAPs with transportation and moving support. This includes support for packing and moving the PAPs' personal belongings to the potential rental property / structure as well as to the final replacement house, and any costs associated with storing personal belongings that do not fit in the temporary rental but which the PAP intends to place in their replacement house.

The high-level entitlement details are presented in Table 4-1 below.

Table 4-1: Entitlement Matrix

Type of Loss	Eligibility Criteria	Entitlement	Details
Permanent loss of residential land	Land title	In-kind replacement with equivalent parcel, or cash compensation at full replacement cost.	Replacement land must be equivalent in value and be similar in terms of other characteristics including location and appropriateness for the intended use (hosting a residential structure in this case). Payment by the Project of all reasonable administrative costs / fees, including legal fees, transaction fees, and other costs associated with the transfer of the land parcel (registration fees, taxes, etc.). Assistance preparing the land for its intended use (i.e. hosting a residential structure) if necessary.

Type of Loss	Eligibility Criteria	Entitlement	Details
Permanent loss of non-residential / non-productive land	Land title	Cash compensation at full replacement cost.	The compensation for lands must be at least at market value, which should align with the cost to purchase an equivalent parcel of land in the Project Area, even if that is not the intended use of the funds by the PAP. Payment by the Project of all reasonable administrative costs / fees, including legal fees, transaction fees, and other costs associated with the transfer of the land parcel (registration fees, taxes, etc.).
Permanent loss of residential structure	Land title	Compensation, cash or in-kind, at full replacement cost.	In-kind replacement with equivalent house meeting minimum standards. Payment by the Project of all reasonable administrative costs / fees, including legal fees, transaction fees, and other costs associated with the transfer of the residential structure (registration fees, taxes, etc.).
Loss of collateral associated with land parcels	Land title	Compensation sufficient to ensure the PAPs' financial situation and land tenure situation are equivalent to, or improved, prior to pre-displacement levels.	Compensation such that the PAPs are able to clear their lands of these encumbrances prior to land acquisition. Payment of any associated administrative / transaction fees.

5. Asset Valuation

The affected assets were originally valued in late 2023 / early 2024 by Nevis-based G.B. Architectural Design Services, as commissioned by NIA. The valuation methodology included an assessment of neighbourhood rating factors, such as shopping convenience, proximity to schools and churches, adequacy of utilities, availability of recreational facilities, access to public transportation, and proximity to emergency services. Access to central services, accessibility, topography, land use, property size, and prevailing market conditions were also considered in determining the estimated values, as well as property appearance and its overall appeal to the market. Each property was provided a score for these factors using qualitative ratings such as "Good" and "Convenient" which were not fully explained in the valuation. The results of the original valuations are provided in Annex C (redacted from this version of the RAP).

While NIA commenced negotiations with the PAPs based on these values (see Chapter 6 for details), due to vagueness associated with the methodology utilized as well as time elapsed since the original valuations were done, NIA commissioned updated valuations as part of this RAP update to ensure the asset values reflected current market conditions.¹² The results of the updated valuations are provided in Annex D (redacted from this version of the RAP).

The international safeguards outlined in Chapter 2 mandate a transparent approach to asset compensation determination, to ensure that all PAPs receive, as a baseline, equivalent compensation for equivalent assets.¹³ Table 5-1 below therefore shows the assessed market value of each parcel, as well as the residential structure. It is important to note that these assessed values do not reflect the outcome of negotiations with the PAPs, but rather the minimums to which they are entitled. The outcome of negotiations with the PAPs is presented in Annex B (redacted from this version of the RAP).

Table 5-1: Assessed Asset Values

Parcel #	Details	Asset	Size	Updated Date of Valuation	Updated Assessed Value (ECC)
1	Register Book 46, Folio 124	Land	32,616 sqft	June 2026	Redacted
		Residential Structure	1,118 sqft	June 2026	Redacted ¹⁴
2	Register Book 14, Folio 42	Land	65,448 sqft	June 2026	Redacted
3	Register Book 55, Folio 46	Land	32,616 sqft	June 2026	Redacted

¹² The updated valuations still contain methodological shortcomings which were not rectified by the service provider; however, given that the final compensation values paid to PAPs (see Annex B) were not ultimately based in these values but rather were the result of negotiations and investigations by all parties resulting in above-market compensation, the robustness of the valuations themselves is immaterial. They are therefore only included for reference.

¹³ As indicated previously, while the situations of individual PAPs including vulnerabilities or special accommodations may result in slight variations in compensation during the negotiation of individual compensation packages, any differences in compensation for equivalent assets must be justifiable by reasons other than the willingness or ability of PAPs to self-advocate or acquire legal representation, as such things may put vulnerable households at a disadvantage.

¹⁴ Note this is the cost including depreciation; the valuation did not provide a value to replace 'as-new' (per the concept of full replacement cost); however, this is immaterial given that NIA is providing the PAPs with a replacement house that is functionally equivalent to (indeed an improvement over) the PAP's current residential structure.

6. Stakeholder Engagement and Socioeconomic Baseline

6.1 PAP engagement by ERM (January 2025)

As indicated previously, ERM conducted initial in-person interviews with PAPs during a site visit in January 2025. The purpose of these meetings was to collect basic PAP information, verify physical assets, and assess the impact of the proposed Project on affected properties. The information collected during these meetings was included in the original RAP document (ERM 2025) and is thus also incorporated where appropriate throughout this document. No formal minutes were available.

6.2 Past PAP engagement by NIA / NHLDC

Since the outset of the land acquisition process (approximately 2022), NIA and NHLDC have maintained contact with the PAPs, both directly through a series of phone calls, emails, and in-person visits and, more recently, indirectly through formal exchanges with the PAPs' legal representatives. The minutes from these meetings, where available, are provided in Annex E (redacted from this version of the RAP).¹⁵ These engagements took the form of negotiations over various aspects of compensation, with both NIA and the PAPs exchanging offers and counter-offers; however, these negotiations were put on hold when the RAP update process began in January 2026 in order to ensure that the gaps that ERM had indicated in their draft RAP (ERM 2025) relating to stakeholder engagement and social baseline data collection had been addressed in alignment with international safeguard expectations¹⁶ (this included lack of socioeconomic data and robust consultations).

6.3 PAP engagement by Evans Global Consulting (EGC) (April 2026)

In April 2026, EGC travelled to Nevis to hold in-person meetings with both households. The minutes from these meetings are provided in Annex E. The purpose of these meetings was to collect limited socioeconomic information¹⁷ and to ensure that PAPs were made aware of their rights and entitlements per the international safeguards outlined in Chapter 2. Specifically, EGC informed the PAPs of the following rights / entitlements:

- Compensation in full (whether cash or in-kind) for all losses prior to displacement.
- Compensation at full replacement cost (current market value plus all transaction / administrative fees) for all assets.

¹⁵ Note that minute meetings prior to the engagement of EGC were not available.

¹⁶ This included lack of socioeconomic data, lack of robust consultations concerning entitlements and preferences, and valuations that were no longer up to date. See Annex A for more details.

¹⁷ See Section 6.5 below pertaining to the limited nature of socioeconomic baseline data collection.

- Compensated for (cash or in-kind) any reasonable transportation / moving costs, legal fees, any other associated reasonable costs (including costs associated with the alternative valuation of assets).
- Choice of compensation (in-kind or cash) where possible.
- Input into the design of replacement structures and determination of rental residences (both within reason).
- Access to a fair and transparent grievance mechanism (see Chapter 10).

EGC also consulted PAPs on:

- How to access / use the grievance mechanism including process / timelines for resolution.
- Approximate Project timelines and any concerns expressed by PAPs.
- The implications of a cut-off date and the relevance of the updated valuation.
- Next steps in the process including: additional engagements pertaining to their preferences, preparation and disclosure of the RAP document, negotiations with NIA / NHLDC pertaining to compensation and restoration options in alignment with the provisions of the RAP, and ultimately implementation of the resettlement once all parties aligned involving preparation and execution of land purchase agreements, full payment of compensation including provision of alternative residential structure and replacement lands, followed by the physical resettlement and Project close after a short monitoring and evaluation phase (see Chapter 11).

6.4 Ongoing engagement by NIA / NHLDC

Subsequent to the site visit mentioned above, and as indicated in Chapter 4, engagement with the PAPs continued, led by Caribbean Architects in a supportive role to NIA / NHLDC, with remote oversight from EGC. The purpose of these engagements was to more formally present the grievance mechanism to the PAPs, to clarify their compensation preferences in light of their understanding of their entitlements established in Section 6.3 above, to establish the cut-off date and obtain permission to conduct the updated valuations, and to ascertain developments pertaining to discussions between NIA / NHLDC and the PAPs over compensation options. These conversations are continuing between NIA / NHLDC, EGC, and the PAPs in parallel to this RAP preparation process.

During consultations, the PAPs' preferences were stated as: in-kind compensation for residential structure and residential land and cash compensation for the remaining lands paid up front (not in installments).

As described in the original RAP (ERM 2025), there has already been significant discussion between NIA / NHLDC and the PAPs pertaining to an appropriate resettlement location (i.e. replacement residential parcel). These details are available in Annex A. The conversations described above as part of the preparation of this RAP and subsequent conversations with NIA and the PAPs aligned on the following details (see Annex B for additional details):

- Preferred method / form of payment to all PAPs.
- Plans to deal with encumbrances on the lands.
- Alignment with PAPs on legal costs being directly incurred and plan for reimbursement (i.e., as part of compensation offer or Project to directly pay fees).
- Rental options, timing, and conditions.
- Replacement house design / replacement land location.
- Engagement preferences moving forward (i.e., if it is to be strictly through legal counsel).

6.5 Socioeconomic Baseline

Per international safeguards, a socioeconomic baseline must be established that both describes the socioeconomic conditions in the Project area as well as establishing PAPs' pre-displacement socioeconomic characteristics. This is done to 1) ensure that Project interventions pertaining to compensation and restoration solutions are culturally appropriate and tailored to the Project context, and 2) to establish a socioeconomic baseline against which the Project's performance in implementing the RAP provisions can be measured. However, because this Project is only affecting one extended family (two separate households), and there are no impacts on livelihoods beyond the use of land as collateral by one of the households, an in-depth socioeconomic baseline was not required. ERM (2025) and EGC (2026) did, however, collect relevant information about each household to inform negotiations over the compensation approach as well as to identify any potential vulnerabilities; this information is presented in Annex B (redacted from this version of the RAP).¹⁸

¹⁸ Note that there is no socioeconomic database provided, because the details of the PAPs and their financial situations are all addressed directly in the compensation offers.

7. Land Acquisition and Resettlement Process¹⁹

The following land acquisition and resettlement process plan aligns with the NLAO, IDB OP-710 and CDB ESRPs. Note that, per NIA's legal team, Section 7.1 and 7.2 only apply if NIA intends to invoke eminent domain, which was not required. Nevertheless, it is useful to lay out all steps for reference in case the Project acquires additional lands in the future, as this RAP would apply equally to those situations. Note that the process outlined in Section 7.1 and Section 7.2 were therefore not undertaken by the Project; rather, negotiations and engagement with the PAPs have proceeded in alignment with the various international standards outlined in Chapter 2.

7.1 Preliminary Notification and Power to Enter the Land

As per Section 4 of NLAO, NHLDC's authorized officer must issue a preliminary notification informing the landowners and the public of the government's intention to acquire the specified land for public purposes. The notification should be published in the official Gazette and posted at a conspicuous place on or near the land.

Following the preliminary notification, Section 4 of NLAO grants the authorised officer the power to enter the land for purposes such as surveying, taking levels, and marking boundaries. This is done to gather necessary information for the acquisition process.

7.2 Negotiations

Under NLAO Section 8, NHLDC's authorised officer gathers all relevant information about the land, including title searches and other checks, to ensure that the land is suitable for acquisition and to identify all parties who may have an interest in the land. This information is crucial for negotiating terms and determining fair compensation. In addition, the authorised officer may require the landowner or any person interested in the land to provide information regarding their interest in the land. This helps in identifying all parties who may be entitled to compensation.

As outlined in Section 6 of the NLAO, NHLDC's authorised officer first attempts to negotiate with the landowner to purchase the land on reasonable terms and conditions. This step involves discussions to reach a mutually acceptable agreement.

¹⁹ Note that this section remains largely unchanged from the original RAP (ERM 2025).

7.2.1 Process when Landowner Agrees

After reaching an agreement, a formal notice of acquisition is issued under NLAO Section 7. This notice is also published in the official Gazette and served directly to the landowner. It includes details such as the description of the land, the purpose of acquisition, and the date on which the land will be acquired.⁶

7.2.2 Process when Negotiations Fail

If negotiations fail, the authorised officer should refer the matter to a Board of Assessment appointed by the Governor General as per NLAO Sections 11 and 12. This Board is responsible for determining the compensation due to the PAP. All relevant documents and information are forwarded to the Board as outlined in Section 13. This includes details about the land, its valuation, and any previous negotiations.

The Board should conduct an inquiry to assess the value of the land and any damages, following the procedures in Sections 14 and 15. This involves gathering evidence, hearing testimonies, and inspecting the property if necessary. The Board should assess the compensation based on the rules provided in Section 19. If the landowner disagrees with the Board's award, the government can proceed by paying the assessed compensation into court, as specified in Section 17. This ensures that the landowner's compensation is secured and available for withdrawal.

7.3 Compensation Payment and Resettlement Procedure²⁰

7.3.1 Compensation Payment Procedure

PAPs must be compensated in full for all losses (whether via cash or in-kind compensation) prior to land acquisition and clearing. Prior to disbursement of compensation, each PAP will sign a compensation offer which sets out the mutual commitments for each party. The signing of these compensation offers occurred in parallel to the publication of this document.

The compensation offers include the following details specific to each PAP:²¹

²⁰ This section will also form the basis for a more specific implementation plan, to be prepared following the disclosure and alignment of all parties on this RAP.

²¹ It is critical to reiterate that this RAP does not constitute legal advice. Its purpose is to layout the safeguards applicable to the Project and the details of consultations with PAPs. It is the sole responsibility of NIA's legal team to determine the precise terms of any legal documentation or agreement, in alignment with national laws as well as the expectations of the safeguards outlined in this document.

- Total compensation package including explicit details about cash versus in-kind compensation and how the compensation will be paid including timing, as well as arrangements made for the encumbrances on the lands.
- Explicit break-down of what is included in the total compensation amount, including estimations of the value of all ‘additional’ costs, i.e., transportation, moving cost, storage of personal belongings, etc. and whether these will be paid by PAPs then reimbursed by NIA (in this case, it must be stated explicitly whether these costs are incorporated into the total compensation amount or in addition to that amount) or paid by NIA directly (in this case, they would not be part of the total compensation amount).
- Details of the replacement house as well as the identified rental property (including location, how it will be paid for, move-in date, and additional considerations).
- Clear timelines for all stages of the compensation and restoration process including rental duration and contingencies for any delays in provision / construction of replacement housing.

Following agreement and signing of the certificates, compensation will be disbursed to the bank account of the PAPs. NIA / NHLDC will be responsible for ensuring receipt of the financial compensation of the parties and for ensuring, along with NEVLEC, that PAPs receive compensation prior to displacement and prior to the start of any activities on the lands in question.

7.3.2 Resettlement Procedure

Per Annex B, the replacement residential land is located on a vacant parcel already zoned for residential construction. Therefore, it is assumed that no ESIA will be required for the acquisition of the land and subsequent construction of a replacement residential structure.²²

Once the Sale and Purchase Agreement has been signed with the PAPs, NIA / NHLDC will formally survey the property and present the results to the PAPs (if requested) and submit request for the transfer of the title to the PAPs. In the meantime, per the explanation in Section 4.3.1.2 above, NIA will take possession of the lands and clear the lands (i.e., move the PAPs into their rental property) followed four to six weeks later by the formal transfer of

²² NIA / NHLDC will confirm; if this is not the case, NIA / NHLDC will determine the studies required and commission consultants to complete them as required under Nevis laws as part of implementation.

titles. Clearing of the lands includes assisting PAPs to physically relocate, which will be overseen by NIA / NHLDC with support from NEVLEC as required (see Chapter 8 on Roles and Responsibilities). Additional details will be laid out in a brief implementation plan to be prepared by EGC.

8. Roles and Responsibilities

This section outlines the framework for implementing resettlement, including the agencies responsible for delivering resettlement measures, coordination arrangements between involved entities, and steps to enhance the capacity of implementing agencies. It also details how responsibilities for managing facilities and services will be transferred to local authorities or PAPs when appropriate.

Key roles and responsibilities with regards to the RAP are set out in Table 8-1.

Table 8-1: Roles and Responsibilities

Stakeholder	Interest	Roles/ Responsibilities
NIA / NHLDC	Responsible for land acquisition process	• Approve draft and final RAPs • Commission and oversee formal land valuation for all affected assets (with support of EGC) • Complete compensation negotiations with each PAP (with support of EGC) • Disburse compensation to each PAP and ensure the receipt of said financial compensation • Manage acquisition, title transfer, and preparation of replacement properties • Organize and oversee construction of replacement residence (NHLDC) • Lead monitoring of RAP and provide information to EGC • Manage grievances related to land acquisition
NEVLEC	Project developer	• Approve draft and final RAPs • Engage contractor to offer in-country assistance with the RAP (Caribbean Architects) • Facilitate good communications and relations with the PAPs in conjunction with NIA / NHLDC • Support monitoring of RAP and provide information to EGC • Support NIA / NHLDC in negotiations, logistics, and grievance management conjunction
CDB / IDB	Project Lender	• Approve draft and final RAPs • Engage contractors (EGC) to prepare the RAP and oversee negotiations and implementation • Provide ongoing oversight / guidance to all parties pertaining to safeguards alignment • Approve disbursements and oversee Project development

Stakeholder	Interest	Roles/ Responsibilities
EGC	RAP Consultant	• Prepare and oversee implementation of RAP • Liaise between NIA/NHLDC and PAPs and oversee negotiations with PAPs • Prepare RAP completion report

9. Grievance Management Process

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 Project Grievance Mechanism is an instrument to guarantee transparency and commitment between the Project and PAPs.

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. 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 Nevis's legal system but covers the legal process in the Grievance Mechanism to minimize the escalation of grievances to the judicial system. The full description of the Project Grievance Mechanism can be found in Annex F of this RAP.

The grievance mechanism is in place and has been communicated to the PAPs (see Chapter 6). It will also be made publicly available on NEVLEC's website, providing a platform for grievances to be submitted online and anonymously.

10. Monitoring and Evaluation

10.1 Monitoring and Evaluation Objectives and Indicators

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. In the case of this Project, monitoring and evaluation will be an effective but limited exercise, given the small number of PAPs and the lack of impact of loss of land on PAP's livelihoods (i.e., PAP is not reliant on the land as a source of income or subsistence, beyond aforementioned encumbrances on two of the affected land parcels). Monitoring and evaluation, which will begin during implementation, will consist of confirming that:

1. Replacement housing and land are functionally equivalent to that being lost.
2. Rental housing provided to the PAP is functionally equivalent to the PAPs' current standard of living and is provided prior to acquisition per the provisions indicated in the compensation certificate.
3. Compensation is paid in a timely manner (i.e., prior to acquisition) and in full, in alignment with full replacement cost, and in a manner acceptable to the PAPs.
4. The encumbrances on the land parcels are dealt with, prior to acquisition, in a manner acceptable to the PAPs and which leaves them in an equivalent or better financial situation than prior to land acquisition.
5. The Project provides all transportation and logistical support required to the PAPs during the moving process (either through reimbursement or direct payment, to be agreed upon with the PAPs).
6. PAPs have continued access to a grievance mechanism beyond the resettlement date, and any grievances received are addressed in a timely and equitable manner and the results documented per the Project Grievance Procedure.
7. Ensuring that all aspects of the land acquisition process complied with Nevis legal requirements.²³

10.2 Monitoring and Evaluation Process

Given the limited scope of the resettlement, EGC will directly oversee the monitoring and evaluation of the RAP implementation remotely and, if necessary, through an additional site visit, working in close cooperation with NIA / NHLDC, NEVLEC, and Caribbean Architects. If

²³ This will be the responsibility of NIA's legal team as an input into M&E reporting.

any required corrective actions are identified during the course of RAP implementation, EGC will advise on their nature and oversee their enactment. EGC will report ongoing monitoring results on a weekly basis to all relevant parties and will prepare a RAP completion report when all activities outlined in the RAP and subsequent implementation plan have been implemented. Due to the nature of the resettlement, the duration of monitoring and evaluation is anticipated to be three months following the disclosure of this RAP (planned for July 2026) and there is no foreseen need for any additional, third-party external monitoring and evaluation.

11. Estimated Resettlement Budget

Given that only one extended family is affected by this land acquisition, it is not possible to identify the precise amounts of compensation for assets and other losses paid without infringing on the privacy of the individual PAPs. Therefore, Table 11-1 below represents a template of cost considerations to be made by the Project. A full budget will be included in Annex G, which will not be included in the publicly disclosed version of this RAP.

The assumptions informing this budget estimation are as follows:

- There will be no indirect economic displacement of any commercial entities due to noise / vibration / dust.
- There will be no temporary or permanent land acquisition associated with the building of the access road.
- No ESIA or additional studies will be required for replacement lands.
- Monitoring and evaluation will be for a period of four months maximum.
- RAP consultant costs are for EGC; costs for Caribbean Architects are included under the Project ESIA budget and therefore not included.

Table 11-1: Cost Categories for RAP implementation

Item	Description	Estimated COST USD*
1	Compensation for lost assets	
1a	<i>Compensation for lost vacant lands (cash compensation)</i>	See Annex G
1b	<i>Compensation for lost residential lands (in-kind)</i>	See Annex G
1c	<i>Compensation for lost residential structure (in-kind)</i>	See Annex G
2	Costs associated with rental residence	
2a	<i>Rent (x 8 months)</i>	See Annex G
2b	<i>Storage of personal belongings (x 8 months)</i>	See Annex G
3	Resettlement Assistance	
3a	<i>Transportation of personal belongings (x 2, temporary and permanent move of PAPs)</i>	See Annex G
3b	<i>Land preparation fees (if applicable)</i>	See Annex G

Item	Description	Estimated COST USD*
4	Administrative, legal, and other fees	
4a	<i>PAPs' reasonable personal legal counsel fees</i>	See Annex G
4b	<i>Architect fees (if applicable)</i>	See Annex G
4c	<i>Other legal, registration, other administrative fees</i>	See Annex G
Sub-total		\$
5	RAP implementation support fees	
5a	<i>RAP implementation support incl. M&E (4 months)</i>	See Annex G
Sub-total		\$
	Contingency (to cover unforeseen costs)	See Annex G
TOTAL		\$

12. References

Nevis Land Acquisition Ordinance (1997). Revised edition as of December 31, 2009. Available online at [Law Commission of St. Kitts and Nevis](#).

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

International Finance Corporation (2012). Performance Standards on Environmental and Social Sustainability.

Inter-American Development Bank Operational Policy 710 (1998). Approved by the Board of Executive Directors on July 22, 1998.

Caribbean Development Bank Environmental and Social Review Procedures (2014). Appraisals conducted by G.B. Architectural Design Services.

ANNEX A: Original ERM RAP

[Redacted from public version for disclosure]

ANNEX B: Household Info and Compensation Offers

[Redacted from public version for disclosure]

ANNEX C: Original Valuation Reports

[Redacted from public version for disclosure]

ANNEX D: Updated Valuation Reports

[Redacted from public version]

ANNEX E: Consultation Minutes

[Redacted from public version]

ANNEX F: Grievance Management Procedure

NEVIS GEOTHERMAL ENERGY PROJECT

GRIEVANCE REDRESS MECHANISM (GRM)

Nevis Island Administration (NIA)
& Nevis Electricity Company Limited (NEVLEC (or PMU))

Prepared For:
Inter-American Development Bank (IDB)
Caribbean Development Bank (CDB)

Prepared By:
Nevis Island Administration (NIA)

2026-04-14

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1 Introduction

1.1 *Purpose of the GRM*

The Grievance Redress Mechanism (GRM) provides a clear, accessible, and transparent process for Project Affected Persons (PAPs) and other stakeholders to raise concerns related to land acquisition, resettlement, construction impacts, or any aspect of the Nevis Geothermal Energy Project.

Its purpose is to ensure that grievances are addressed **promptly, fairly, and without retaliation**, and that issues are resolved before they escalate.

1.2 *Scope and Applicability*

The GRM applies to:

- All PAPs identified in the RAP
- Individuals or businesses affected by access road works
- Persons experiencing economic displacement (e.g., Vanilla Café)
- Community members affected by construction impacts
- Contractors and subcontractors interacting with the public

It covers grievances related to:

- Land acquisition and compensation
- Resettlement and transitional support
- Valuation disputes
- Construction impacts (noise, dust, access restrictions)
- Behavior of project staff or contractors
- Vulnerability-related concerns
- Any allegation of retaliation or intimidation

1.3 Alignment with Lender Safeguards

The GRM is fully aligned with:

- IDB OP-710 (Involuntary Resettlement)
- CDB ESRP (Land Acquisition & Resettlement)
- IFC PS5 (Land Acquisition & Involuntary Resettlement)
- WB OP 4.12

Where national and international requirements differ, the **higher standard applies**.

1.4 National Legal Remedies and Non-Obstruction

The GRM does **not** replace the right of PAPs to seek redress through:

- The Nevis Land Acquisition Ordinance (NLAO)
- Courts or tribunals
- Other statutory mechanisms

The Project will **not obstruct** or discourage access to legal remedies.

1.5 Guiding Principles

The GRM is based on the following principles:

- **Fairness:** Objective, evidence-based review
- **Accessibility:** Multiple channels, including for overseas PAPs
- **Non-retaliation:** PAPs protected from intimidation
- **Transparency:** Clear steps, timelines, and documentation
- **Cultural appropriateness:** Local norms respected
- **Gender and vulnerability sensitivity:** Special accommodations provided

1.6 IDB Three-Tier Grievance Architecture

- **Tier 1:** Project-level resolution (NIA/NEVLEC (or PMU))
- **Tier 2:** Senior Management Review Panel
- **Tier 3:** IDB MICI / CDB Independent Review Mechanism

2 Definitions

Term	Definition
Acknowledgment	Formal confirmation sent to the complainant within 5 business days that their grievance has been received and registered.
Anonymous Grievance	A grievance submitted without identifying information. It is accepted and processed with the same seriousness as named submissions.
Archiving	Secure storage of all GRM records for at least 7 years .
Closure	The formal completion of a grievance case after resolution is accepted or escalated.
Compensation	Payment or in-kind support provided to PAPs for land, structures, or livelihood impacts, based on full replacement cost.
Contractor GRM	The grievance system operated by contractors, aligned with the Project GRM and reporting all cases within 24 hours.
Corrective Action	Measures taken to address the root cause of a grievance and prevent recurrence.
Cut-Off Date	The date after which new occupants, improvements, or claims are not eligible for compensation. Reset when updated valuations are completed.
Economic Displacement	Loss of income, livelihood, or access to economic resources due to Project activities, even when physical relocation does not occur .
Encumbrance	Any legal or financial claim on a property (e.g., mortgage, lien, loan) that must be addressed during compensation.
Evidence	Documentation, photos, statements, or records used to investigate a grievance.
Focal Point	The designated staff member responsible for receiving, recording, and managing grievances.

Term	Definition
Full Replacement Cost	Compensation reflecting the market value of land or assets plus all transaction costs, without depreciation, as required by IFC PS5 and IDB/CDB standards.
GBV/SEA/SH	Gender-based violence, sexual exploitation and abuse, or sexual harassment — treated as sensitive grievances requiring confidential handling.
Grievance	Any concern, complaint, question, or dissatisfaction raised by a PAP or community member related to the Project's activities, decisions, or impacts.
Grievance Redress Mechanism (GRM)	The formal system established by NIA/NEVLEC (or PMU) to receive, record, assess, resolve, and monitor grievances in a fair, transparent, and timely manner.
GRM Register	The official log where all grievances, actions, timelines, and outcomes are recorded.
High-Risk Grievance	Issues involving safety, retaliation, GBV/SEA/SH, or severe harm requiring immediate action and lender notification.
Investigation	The process of gathering information, interviewing parties, reviewing evidence, and determining facts related to a grievance.
IRM (CDB)	The Independent Review Mechanism of the Caribbean Development Bank, which investigates complaints related to CDB safeguard compliance.
Livelihood Restoration	Measures to help PAPs restore or improve income, employment, or economic conditions affected by the Project.
Low-Risk Grievance	General inquiries or minor concerns requiring simple clarification or administrative action.
Medium-Risk Grievance	Issues involving compensation, valuation, access, or construction impacts requiring investigation and timely resolution.

Term	Definition
MICI (IDB)	The Independent Consultation and Investigation Mechanism of the Inter-American Development Bank, which reviews complaints about harm caused by IDB-financed projects.
Monitoring	Ongoing review of GRM performance, timelines, and effectiveness.
Non-Retaliation	The principle that no person will face threats, intimidation, or adverse consequences for submitting a grievance.
Physical Displacement	Loss of residence or need to relocate due to land acquisition or Project activities.
Post-Resettlement Period	The minimum 12-month period after resettlement during which the GRM remains active.
Project Affected Person (PAP)	Any individual, household, or business experiencing physical or economic impacts from the Project.
Quarterly GRM Report	Summary of grievances, trends, and corrective actions submitted to IDB/CDB every quarter.
Resolution	The agreed corrective action or response provided to address a grievance.
Retaliation	Any threat, intimidation, harassment, or adverse action taken against a person for submitting a grievance or participating in the GRM. Strictly prohibited.
Sensitive Grievance	Complaints involving GBV/SEA/SH, retaliation, intimidation, threats, or other high-risk issues requiring confidential handling and immediate action.
Stakeholder Engagement	The process of informing, consulting, and involving PAPs and communities in Project decisions.
Tier 1 Resolution	First level of grievance handling by NEVLEC (or PMU)/NIA GRM Focal Points.

Term	Definition
Tier 2 Resolution	Escalated review by the Senior Management Review Panel (NIA, NEVLEC (or PMU), NHLDC, MCPW).
Tier 3 Resolution	External escalation to IDB MICI or CDB IRM when PAPs are not satisfied with Project-level responses.
Valuation	The process of determining the market value of land, structures, or assets, conducted by a qualified valuer using transparent, replicable methods.
Vulnerable Person	Individuals requiring special support due to age, disability, gender, socio-economic status, or other factors.

3 Institutional Arrangements and Responsibilities

3.1 *Nevis Island Administration (NIA)*

- Lead authority for land acquisition and compensation
- Ensures compliance with NLAO and lender safeguards
- Chairs Tier 2 Review Panel

3.2 *NEVLEC (or PMU)*

- Operates the GRM day-to-day
- Maintains the grievance register
- Ensures timely acknowledgment and response
- Coordinates with contractors and EGC

3.3 *NHLDC*

- Manages compensation payments and title transfer
- Provides documentation for grievance resolution

3.4 *Ministry of Communications and Public Works (MCPW)*

- Provides technical inputs for access road-related grievances
- Confirms design-related impacts

3.5 *Contractors and Subcontractors*

- Maintain contractor-level GRMs aligned with this mechanism
- Report all grievances to NEVLEC (or PMU) within 24 hours
- Participate in investigations

3.6 *Grievance Focal Points*

- Designated staff at NIA and NEVLEC (or PMU)
- Responsible for intake, logging, communication, and follow-up
- Must be trained in confidentiality and sensitive-case handling

3.7 Distinction Between Project-Level and RAP-Specific GRM

- **Project-level GRM:** All construction-related issues
- **RAP-specific GRM:** Land acquisition, valuation, compensation, resettlement

3.8 Coordination with EGC and Independent Monitoring

- EGC receives all documentation for RAP monitoring
- Independent monitor may review grievance files

3.9 Lender Notification Obligations

- Serious grievances (e.g., retaliation, GBV/SEA/SH, unresolved compensation disputes) must be reported to IDB/CDB within **5 business days**.

4 GRM Structure and Process Overview

4.1 Overview of Workflow

1. Submission
2. Registration
3. Acknowledgment
4. Assessment and risk categorization
5. Investigation
6. Resolution proposal
7. PAP acceptance or escalation
8. Closure and documentation

4.2 Tier 1 – Project-Level Resolution

Handled by NEVLEC (or PMU)/NIA within **15 business days**.

4.3 Tier 2 – Senior Management Review Panel

If unresolved, reviewed by a panel including NIA, NEVLEC (or PMU), NHLDC, and MCPW.

Timeline: **20 business days**.

4.4 Tier 3 – Lender Accountability Mechanisms

PAPs may escalate to:

- IDB MICI
- CDB Independent Review Mechanism

4.5 Relationship with Judicial Remedies

PAPs may pursue legal action at any stage.

4.6 Timeframes and Service Standards

- Acknowledgment: **5 business days**
- Investigation: **15–20 business days**
- Sensitive cases: **Immediate action**

5 Access Channels and Submission Methods

5.1 Physical Submission Points

- NEVLEC (or PMU) office
- NIA office
- Community centers (designated locations)

5.2 Telephone and SMS Channels

Dedicated hotline with voicemail capability.

5.3 Email and Digital Portals

Project email address and online form.

5.4 Anonymous Submissions

Accepted through physical boxes or digital forms.

5.5 Community-Based Channels

Complaints may be submitted via trusted community representatives.

5.6 Accessibility for Vulnerable Groups

Accommodations include:

- Home visits
- Assistance with form completion
- Translation/interpretation

5.7 Overseas PAPs

- Email and digital submissions
- Remote verification
- Time-zone-adjusted communication

6 Grievance Intake, Registration, and Acknowledgment

6.1 Intake Procedures

All grievances are accepted regardless of format or language.

6.2 Required Information

- Name (optional)
- Contact information
- Description of issue
- Date and location
- Desired outcome

6.3 Acknowledgment Protocols

Acknowledgment within **5 business days**.

6.4 GRM Register

Includes:

- Unique ID
- Date received

- Category
- Risk level
- Status
- Actions taken

6.5 Data Privacy and Security

All records stored securely; access restricted to authorized personnel.

7 Risk-Based Grievance Prioritization

7.1 Categorization

- **High risk:** Safety, retaliation, GBV/SEA/SH, threats
- **Medium risk:** Compensation disputes, access issues
- **Low risk:** General inquiries

7.2 Immediate-Action Protocols

High-risk cases receive **same-day** response.

7.3 Escalation Triggers

- Threats to safety
- Allegations of intimidation
- Unresolved compensation disputes

7.4 Special Handling

Sensitive cases handled by trained personnel only.

8 Sensitive Grievances Protocol

8.1 GBV/SEA/SH Complaints

Handled confidentially with survivor-centered principles.

8.2 Retaliation and Intimidation

Immediate protection measures activated.

8.3 Anonymous and Confidential Complaints

Accepted and investigated with equal seriousness.

8.4 Survivor-Centered Response

- Confidentiality
- Consent-based information sharing
- Referral to appropriate services

8.5 Referral Pathways

Links to health, psychosocial, and legal support services.

9 Investigation Procedures

9.1 Investigation Standards and Methodology

All grievances are investigated using a consistent, transparent approach that includes:

- Reviewing documentation and evidence
- Interviewing the complainant (unless anonymous)
- Consulting relevant project staff or contractors
- Conducting site visits where necessary
- Applying objective criteria to determine findings

9.2 Roles and Responsibilities in Investigations

- **NEVLEC (or PMU) GRM Focal Point** leads investigations for Tier 1 cases.
- **NIA/NHLDC** provide inputs for land, valuation, and compensation disputes.

- **MCPW** provides technical inputs for access-road-related grievances.
- **Contractors** must cooperate fully and provide requested information.

9.3 Evidence Collection and Documentation

Evidence may include:

- Photos, maps, or site observations
- Valuation reports
- Meeting minutes (as required by the Field Report)
- Contractor logs
- Statements from PAPs or witnesses

9.4 Remote Investigations (Overseas PAPs)

For PAPs abroad

- Interviews conducted via phone or video
- Digital submission of documents
- Remote verification of identity and claims

9.5 Encumbrance-Related Grievances

For grievances involving mortgages, liens, or loan obligations:

- NHLDC and NIA legal units provide clarification
- PAP preferences for payment routing are documented
- Findings are integrated into compensation agreements

9.6 Joint Investigations with Contractors

Where grievances relate to construction impacts:

- NEVLEC (or PMU) and contractor conduct joint site visits
- Contractor corrective actions are documented and monitored

10 Resolution and Response

10.1 Resolution Options

Resolutions may include:

- Corrective actions
- Compensation adjustments
- Construction mitigation measures
- Clarification of information
- Apologies or commitments to improve practices

10.2 Decision-Making Authority

- **Tier 1:** NEVLEC (or PMU) GRM Focal Point
- **Tier 2:** Senior Management Review Panel (NIA, NEVLEC (or PMU), NHLDC, MCPW)
- **Tier 3:** IDB MICI / CDB IRM

10.3 Communication of Outcomes

PAPs receive written or verbal notification including:

- Summary of findings
- Proposed resolution
- Timeline for implementation
- Options for appeal

10.4 PAP Acceptance or Rejection

If the PAP accepts the resolution, the case is closed. If not, the grievance is escalated to Tier 2.

10.5 Integration with RAP Entitlements

Resolutions must align with:

- RAP entitlement matrix

- Updated valuations
- Transitional support requirements
- Livelihood restoration measures

10.6 Documentation of Resolution

All resolutions are recorded in the GRM Register and stored securely.

11 Appeals and Escalation

11.1 Tier 1 → Tier 2 Escalation

If unresolved at Tier 1 within the timeframe, the case moves to the Senior Management Review Panel.

11.2 Tier 2 → Tier 3 Escalation

If the PAP remains dissatisfied, they may escalate to IDB or CDB accountability mechanisms.

11.3 Access to IDB MICI

PAPs may submit complaints to the **IDB Independent Consultation and Investigation Mechanism (MICI)**.

11.4 Access to CDB Independent Review Mechanism

PAPs may submit complaints to the **CDB IRM**.

11.5 Conditions for External Escalation

PAPs may escalate externally at any time; the GRM does not restrict this right.

12 Contractor GRM Integration

12.1 Minimum Standards for Contractor GRMs

Contractor mechanisms must:

- Be accessible and culturally appropriate
- Allow anonymous submissions
- Record and report all grievances
- Align with Project GRM timelines

12.2 Alignment with Project-Level GRM

All contractor grievances must be logged in the Project GRM Register.

12.3 Contractor Reporting Obligations

Contractors must report grievances to NEVLEC (or PMU) within **24 hours**.

12.4 Joint Resolution Procedures

NEVLEC (or PMU) and contractors jointly investigate construction-related grievances.

12.5 Sanctions for Non-Compliance

Repeated failures to comply may result in contractual penalties.

13 Systemic Issues, Learning, and Corrective Action

13.1 Trend Analysis

NEVLEC (or PMU) reviews grievance data quarterly to identify patterns.

13.2 Root-Cause Analysis

For recurring issues, NEVLEC (or PMU) conducts a structured analysis to identify underlying causes.

13.3 Corrective Action Planning

Corrective actions may include:

- Changes to construction practices

- Additional PAP engagement
- Adjustments to compensation processes

13.4 Feedback to Project Design and RAP Implementation

Findings are shared with NIA, NEVLEC (or PMU), NHLDC, MCPW, and EGC to improve ongoing implementation.

14 Monitoring, KPIs, and Reporting

14.1 Internal Monitoring

NEVLEC (or PMU) monitors:

- Timeliness of responses
- Quality of investigations
- Implementation of resolutions

14.2 External Monitoring

EGC and/or an independent monitor review:

- GRM Register
- Sensitive case handling
- Compliance with RAP and lender safeguards

14.3 Key Performance Indicators (KPIs)

Examples include:

- % of grievances acknowledged within 5 days
- % resolved within 20 days
- % escalated
- PAP satisfaction rate

14.4 Reporting to IDB/CDB

Quarterly reports include:

- Number and type of grievances
- Status and outcomes
- Sensitive cases
- Corrective actions

14.5 Public Disclosure

Summary information is shared with communities through:

- Notice boards
- Community meetings
- NEVLEC (or PMU) website

15 GRM Closure and Post-Resettlement Transition

15.1 Criteria for GRM Closure

The GRM may be closed when:

- All RAP-related grievances are resolved
- No new grievances are received for a defined period
- Lender approval is obtained

15.2 Final Reporting Requirements

A final GRM report includes:

- Summary of all grievances
- Resolutions and corrective actions
- Lessons learned

15.3 Post-Resettlement Operation Period

The GRM remains active for **at least 12 months** after physical resettlement.

15.4 Handover to Long-Term Institutional Mechanisms

After closure, responsibility transitions to:

- NEVLEC (or PMU) customer service channels
- NIA public grievance systems

15.5 Archiving and Long-Term Access

All GRM records are archived securely for a **minimum of 7 years**.

16 ANNEXES

16.1 Annex A – GRM Process Flowchart (Simplified)

Step 1 – Submission

PAP submits grievance through any channel (physical, phone, SMS, email, digital form, community representative, anonymous box).

Step 2 – Registration

NEVLEC (or PMU) GRM Focal Point logs grievance in the GRM Register and assigns a unique ID.

Step 3 – Acknowledgment

Acknowledgment issued within **5 business days**.

Step 4 – Screening & Risk Categorization

- High risk (safety, retaliation, GBV/SEA/SH)
- Medium risk (compensation, access, valuation)
- Low risk (general inquiries)

Step 5 – Investigation

NEVLEC (or PMU)/NIA/Contractor/MCPW conduct investigation depending on grievance type.

Step 6 – Resolution Proposal

Proposed resolution communicated to PAP.

Step 7 – PAP Acceptance or Escalation

- If accepted → case closed
- If rejected → escalated to Tier 2

Step 8 – Tier 2 Review Panel

Senior Management Panel reviews and issues decision.

Step 9 – Tier 3 Escalation

PAP may escalate to IDB MICI or CDB IRM.

Step 10 – Closure & Documentation

Resolution documented and archived.

16.2 Annex B – Grievance Submission Form (Simplified)

Nevis Geothermal Energy Project – Grievance Submission Form

1. Contact Information (optional)

Name:

Address:

Phone/Email:

2. Preferred Method of Contact

- ☐ Phone
- ☐ Email
- ☐ In-person
- ☐ No contact (anonymous)

3. Description of Grievance

(What happened? When? Where? Who was involved?)

4. Type of Issue

- ☐ Land acquisition
- ☐ Valuation/compensation
- ☐ Resettlement
- ☐ Construction impact
- ☐ Contractor behavior
- ☐ Access road impacts
- ☐ Sensitive grievance (GBV/SEA/SH, retaliation)
- ☐ Other (specify)

5. Desired Outcome

(What would you like to see happen?)

6. Supporting Documents (optional)

- ☐ Photos
- ☐ Letters
- ☐ Receipts
- ☐ Other

7. Signature (optional)

Date:

16.3 Annex C – Acknowledgment Template

Subject: Acknowledgment of Grievance – Case ID: [XXXX]

Dear [Name / PAP],

Thank you for submitting your grievance on **[date]** regarding **[brief description]**.

Your grievance has been registered under **Case ID: [XXXX]**.

A member of the Project team will contact you if additional information is needed.

Next Steps:

- Your grievance will be reviewed and categorized.
- An investigation will be conducted.
- You will receive a proposed resolution within **15–20 business days**.

If you have questions, please contact:

NEVLEC (or PMU) GRM Focal Point – [Name, Phone, Email]

Sincerely,

NEVLEC (or PMU) GRM Team

16.4 Annex D – Investigation Report Template

Nevis Geothermal Energy Project – GRM Investigation Report

Case ID:

Date Received:

Risk Category: High / Medium / Low

Investigator(s):

- **1. Summary of Grievance**

(Brief description of issue)

- **2. Methodology**

- ☐ Interview with PAP
- ☐ Site visit
- ☐ Review of documents
- ☐ Consultation with contractor
- ☐ Consultation with NIA/NHLDC/MCPW
- ☐ Remote verification (for overseas PAPs)

- **3. Evidence Collected**

(List documents, photos, statements)

- **4. Findings**

(What was confirmed? What was not confirmed?)

- **5. Proposed Resolution**

(Describe recommended corrective action)

- **6. PAP Response**

- ☐ Accepted
- ☐ Rejected
- ☐ Requested escalation

- **7. Follow-Up Actions**

(Implementation steps and deadlines)

- **8. Closure**

Date closed:

Closed by:

16.5 Annex E – Resolution Agreement Template

Nevis Geothermal Energy Project – Resolution Agreement

Case ID:

PAP Name (optional):

Date:

- **1. Summary of Grievance**

(Brief description)

- **2. Agreed Resolution**

(Describe the agreed corrective action, compensation adjustment, mitigation measure, or other resolution)

- **3. Implementation Timeline**

- Action 1: [Date]

- Action 2: [Date]

- Responsible party: [NEVLEC (or PMU)/NIA/NHLDC/Contractor]

- **4. PAP Confirmation**

I confirm that I understand and accept the resolution described above.

Signature (optional):

Date:

- **5. Project Representative**

Name:

Position:

Signature:

16.6 Annex F – GRM Register Format

Nevis Geothermal Energy Project – GRM Register

Field	Description
Case ID	Unique identifier
Date Received	Submission date
PAP Name (optional)	If provided
Contact Information	Phone/email
Grievance Type	Land, valuation, construction, etc.
Risk Category	High/Medium/Low
Summary of Issue	Short description
Investigation Required	Yes/No
Investigation Start/End	Dates
Findings	Summary
Proposed Resolution	Description
PAP Response	Accepted/Rejected
Escalation	Tier 1 → Tier 2 → Tier 3
Date Closed	Closure date
Notes	Additional comments

16.7 Annex G – Contact Information for GRM Focal Points

Nevis Geothermal Energy Project – GRM Contact List

16.7.1 NEVLEC (or PMU) – Project GRM Focal Point

Name:

Position:

Phone:

Email:

Office Address:

16.7.2 NIA – Land Acquisition & Resettlement Focal Point

Name:

Position:

Phone:

Email:

16.7.3 NHLDC – Compensation & Title Transfer Focal Point

Name:

Phone:

Email:

16.7.4 MCPW – Access Road & Technical Issues Focal Point

Name:

Phone:

Email:

16.7.5 Contractor – Construction Impacts Focal Point

Name:

Company:

Phone:

Email:

16.7.6 Emergency / Sensitive Case Contact

(For retaliation, intimidation, GBV/SEA/SH)

Name:

Phone:

Email:

16.8 Annex H – Non-Retaliation and Protection Protocol

16.8.1 1. Purpose

To ensure that all PAPs and stakeholders can raise grievances **without fear of retaliation, intimidation, or adverse consequences.**

16.8.2 2. Zero-Tolerance Policy

The Project adopts a strict **zero-tolerance** stance toward:

- Threats
- Harassment
- Intimidation
- Retaliation
- Withholding of services or benefits
- **3. Protection Measures**

If retaliation is alleged or suspected:

- The case is automatically classified **High Risk**.
- Immediate protective measures are activated (e.g., confidential handling, restricted access to information).
- Senior management is notified within **24 hours**.
- IDB/CDB are notified within **5 business days**.
- **4. Confidentiality**
- Identities of complainants are protected.
- Sensitive information is shared strictly on a need-to-know basis.
- **5. Special Considerations for Vulnerable Groups**

Additional safeguards apply to:

- Elderly persons
- Women and girls
- Persons with disabilities

- PAPs living abroad
- Individuals dependent on NIA/NEVLEC (or PMU) services
- **6. Reporting Retaliation**

PAPs may report retaliation through:

- Anonymous channels
- Community representatives
- Direct contact with the GRM Focal Point
- IDB MICI or CDB IRM

16.9 Annex I – PAP Guide to IDB MICI and CDB IRM

- **1. Purpose**

To inform PAPs of their right to escalate grievances to lender accountability mechanisms.

- **2. IDB – MICI (Independent Consultation and Investigation Mechanism)**

What MICI Does:

- Reviews complaints alleging harm caused by IDB-financed projects.
- Offers dispute resolution and compliance review.

Who Can File:

- Any affected person or group.
- Anonymous submissions allowed through representatives.

How to File:

- Online form
- Email
- Postal mail

When to File:

- After attempting resolution through the Project GRM
- Or immediately for serious harm or retaliation

- **3. CDB – Independent Review Mechanism (IRM)**

What IRM Does:

- Investigates complaints about non-compliance with CDB safeguards.
- Facilitates problem-solving and compliance review.

Who Can File:

- Any affected person or community.

How to File:

- Email
- Letter
- Through a representative

When to File:

- After using the Project GRM
- Or immediately for high-risk cases

- **4. Assistance for PAPs**

NEVLEC (or PMU) will:

- Provide information on how to file
- Assist with documentation if requested
- Ensure no retaliation occurs

16.10 Annex J – Contractor GRM Minimum Requirements

- **1. Purpose**

To ensure contractor-level grievance systems meet Project and lender standards.

- **2. Minimum Requirements**

Contractor GRMs must:

- Provide at least **two** accessible channels (e.g., phone, on-site box).
- Allow anonymous submissions.
- Record all grievances in writing.
- Respond within **5 business days**.
- Resolve within **15 business days**.
- Report all grievances to NEVLEC (or PMU) within **24 hours**.
- Escalate unresolved cases to the Project GRM.
- **3. Integration with Project GRM**
- All contractor grievances must be entered into the **Project GRM Register**.
- Contractor corrective actions must be monitored by NEVLEC (or PMU).
- **4. Training Requirements**

Contractor staff must be trained in:

- Respectful communication
- Confidentiality
- Sensitive grievance handling
- Non-retaliation obligations
- **5. Sanctions for Non-Compliance**

Repeated failures may result in:

- Corrective action notices
- Withholding of payments
- Contract suspension or termination

16.11 Annex K – Quarterly Monitoring Template

Nevis Geothermal Energy Project – Quarterly GRM Monitoring Report

- **1. Summary of Grievances (Quarter)**

- Total grievances received
- Total resolved
- Total pending
- Total escalated

- **2. Breakdown by Category**

- Land acquisition
- Valuation
- Compensation
- Resettlement
- Construction impacts
- Sensitive grievances

- **3. Breakdown by Risk Level**

- High
- Medium
- Low

- **4. Timeliness Indicators**

- % acknowledged within 5 days
- % resolved within 20 days

- **5. Sensitive Cases**

- Number received
- Actions taken
- Status

- **6. Corrective Actions Implemented**
- Description
- Responsible party
- Status
- **7. Recommendations for Next Quarter**
- Improvements to GRM
- Capacity needs
- Engagement priorities

16.12 Annex L – Annual GRM Performance Report Template

Nevis Geothermal Energy Project – Annual GRM Performance Report

- **1. Executive Summary**

Overview of GRM performance, key trends, and major issues.

- **2. Annual Statistics**

- Total grievances received
- Total resolved
- Total escalated
- Average resolution time

- **3. Analysis of Trends**

- Recurring issues
- Seasonal patterns
- Contractor-related issues
- Land acquisition and compensation issues

- **4. Sensitive Grievances**

- Number of GBV/SEA/SH cases
- Retaliation allegations
- Actions taken
- Lessons learned

- **5. Effectiveness Assessment**

- PAP satisfaction
- Compliance with timelines
- Quality of investigations

- **6. Corrective Actions Implemented**

- Summary of improvements
- Outstanding issues

- **7. Recommendations for Next Year**
- Policy updates
- Training needs
- System improvements

16.13 Annex M – Change Log

Nevis Geothermal Energy Project – GRM Change Log

Version	Date	Section Updated	Description of Change	Updated By
1.0	[Insert]	All	Initial GRM issued	NEVLEC (or PMU)/NIA
1.1	[Insert]	Annexes	Updated templates	NEVLEC (or PMU)
1.2	[Insert]	Section 7	Sensitive grievance protocol strengthened	NIA
1.3	[Insert]	Section 11	Contractor GRM requirements updated	NEVLEC (or PMU)/Contractor
1.4	[Insert]	Section 13	KPIs revised	NEVLEC (or PMU)/EGC

17 GRM IMPLEMENTATION CHECKLIST

- *Nevis Geothermal Energy Project*

(For NIA, NEVLEC (or PMU), NHLDC, MCPW, Contractors)

17.1 A. Establish GRM Governance & Staffing

1. Appoint GRM Focal Points

- ☐ NEVLEC (or PMU) GRM Focal Point formally appointed
- ☐ NIA Land Acquisition Focal Point appointed
- ☐ NHLDC Compensation Focal Point appointed
- ☐ MCPW Technical Focal Point appointed
- ☐ Contractor GRM Focal Point appointed

2. Train All Focal Points

Training must cover:

- ☐ GRM workflow
- ☐ Sensitive grievance handling (GBV/SEA/SH, retaliation)
- ☐ Confidentiality and data protection
- ☐ Documentation and reporting
- ☐ Lender safeguard requirements

17.2 B. Set Up GRM Access Channels

3. Physical Channels

- ☐ Submission boxes installed at NEVLEC (or PMU), NIA, community centers
- ☐ Boxes checked weekly

4. Phone/SMS Channels

- ☐ Dedicated hotline established
- ☐ Voicemail enabled

- ☐ Hotline number publicly posted

5. Digital Channels

- ☐ GRM email address created
- ☐ Online submission form activated
- ☐ Auto-acknowledgment enabled

6. Community-Based Channels

- ☐ Community representatives identified
- ☐ Representatives trained on intake

7. Overseas PAP Access

- ☐ Remote submission options tested
- ☐ Time-zone communication protocol established

17.3 C. GRM Documentation & Templates

8. Ensure All Templates Are Ready

- ☐ Grievance Submission Form
- ☐ Acknowledgment Template
- ☐ Investigation Report Template
- ☐ Resolution Agreement Template
- ☐ GRM Register Format
- ☐ Quarterly Monitoring Template
- ☐ Annual Performance Template

9. GRM Register

- ☐ Register created (Excel or database)
- ☐ Unique ID system established
- ☐ Access restricted to authorized staff

17.4 D. Public Disclosure & Awareness

10. Inform PAPs and Communities

- ☐ GRM explained during consultations
- ☐ Posters displayed in communities
- ☐ GRM included in RAP disclosure
- ☐ Contractors briefed on obligations

11. Provide MICI/IRM Information

- ☐ PAP Guide to IDB MICI distributed
- ☐ PAP Guide to CDB IRM distributed

17.5 E. Intake, Registration & Acknowledgment

12. Intake Procedures

- ☐ All channels tested
- ☐ Anonymous submissions enabled

13. Registration

- ☐ All grievances logged within 48 hours
- ☐ Risk category assigned (High/Medium/Low)

14. Acknowledgment

- ☐ Acknowledgment sent within 5 business days

17.6 F. Investigation & Resolution

15. Investigation

- ☐ Investigation launched within 5 days
- ☐ Evidence collected (photos, documents, interviews)

- ☐ Joint investigations with contractors when needed
- ☐ Remote investigations for overseas PAPs

16. Resolution

- ☐ Proposed resolution documented
- ☐ PAP informed of outcome
- ☐ PAP acceptance recorded
- ☐ If rejected → escalate to Tier 2

17.7 G. Appeals & Escalation

17. Tier 2 – Senior Management Review Panel

- ☐ Panel convened when needed
- ☐ Decision issued within 20 business days

18. Tier 3 – Lender Mechanisms

- ☐ PAP informed of MICI/IRM rights
- ☐ Assistance provided if requested

17.8 H. Sensitive Grievances (High-Risk Cases)

19. Immediate Actions

- ☐ Case classified as High Risk
- ☐ Confidential handling activated
- ☐ Senior management notified within 24 hours
- ☐ IDB/CDB notified within 5 business days

20. Survivor-Centered Approach

- ☐ Consent-based communication
- ☐ Referral to support services
- ☐ Protection measures implemented

17.9 I. Monitoring, Reporting & Learning

21. Internal Monitoring

- ☐ Weekly review of GRM Register
- ☐ Monthly internal report

22. External Monitoring

- ☐ EGC receives all documentation
- ☐ Independent monitor reviews sensitive cases

23. Quarterly Reporting

- ☐ Quarterly GRM report submitted to IDB/CDB
- ☐ Trends and systemic issues analyzed

24. Annual Reporting

- ☐ Annual GRM Performance Report completed
- ☐ Lessons learned integrated into RAP implementation

17.10 J. GRM Closure & Transition

25. Closure Criteria

- ☐ All RAP-related grievances resolved
- ☐ No new grievances for defined period
- ☐ Lender approval obtained

26. Post-Resettlement Operation

- ☐ GRM remains active for minimum 12 months after resettlement

27. Handover

- ☐ Transition to NEVLEC (or PMU)/NIA long-term mechanisms

28. Archiving

- ☐ All records archived for minimum 7 years

18 GRM – Community Summary

1. What is the GRM?

The GRM is a way for you to:

- Report a problem
- Ask a question
- Share a concern
- Request clarification
- Make a complaint

It helps ensure that issues are addressed **quickly and respectfully**, without fear of retaliation.

2. What kinds of issues can you report?

You can use the GRM for **any issue related to the Project**, including:

- Land acquisition or compensation
- Valuation of land or structures
- Resettlement or rental arrangements
- Access road impacts
- Construction impacts (noise, dust, traffic, access)
- Contractor's behaviour
- Treatment of vulnerable persons
- Delays or misunderstandings
- Any concern about fairness
- Sensitive issues such as intimidation or harassment

No issue is too small.

3. How can you submit a grievance?

You can submit a grievance in **any of the following ways**:

- **A. In person**

Drop a written complaint into the GRM box at:

- NEVLEC (or PMU) office
- NIA office
- Community centres (designated locations)
- **B. By phone or SMS**

Call or text the Project hotline:

[Insert number]

- **C. By email**

Send an email to:

[Insert GRM email]

- **D. Online**

Use the Project's online form:

[Insert link]

- **E. Through a community representative**

You may ask a trusted person to submit on your behalf.

- **F. Anonymous**

You may submit a complaint **without giving your name**.

4. What happens after you submit a grievance?

- **Step 1 – We register your complaint**

You will receive an acknowledgment within **5 working days**.

- **Step 2 – We investigate**

The Project team reviews the issue, speaks with you (if you wish), and gathers information.

- **Step 3 – We propose a solution**

You will receive a response within **15–20 working days**, depending on the issue.

- **Step 4 – You decide**

If you accept the solution, the case is closed.

If not, it can be **appealed**.

5. What if you are not satisfied?

If you are not satisfied with the Project's response, you may:

- **Tier 2 – Appeal to Senior Management**

Your case will be reviewed by senior officials from NIA, NEVLEC (or PMU), NHLDC, and MCPW.

- **Tier 3 – Contact the funding agencies**

You may take your complaint to:

- **IDB MICI** (Independent Consultation and Investigation Mechanism)
- **CDB Independent Review Mechanism**

The Project will help you understand how to do this if you request assistance.

6. Protection from retaliation

You are **safe** to raise concerns.

The Project has a **zero-tolerance policy** for:

- Threats
- Intimidation
- Harassment
- Retaliation of any kind

If you feel unsafe, you may submit a **confidential or anonymous** complaint.

7. Special support for vulnerable persons

Extra help is available for:

- Elderly persons
- Women and girls
- Persons with disabilities
- People living abroad
- Anyone who needs assistance to submit a complaint

We can help you fill out forms or meet you at home if needed.

8. How long will the GRM be available?

The GRM will remain active:

- Throughout land acquisition
- Throughout construction
- For **at least 12 months after resettlement**

9. Need help or more information?

Contact the GRM Focal Points at:

NEVLEC (or PMU):

- Name: Curleane Liburd
- Phone: +1 (869) 662-5887
- Email: curleane.liburd@nevlec.com

NIA:

- Name: Permanent Secretary Daniel Wakely
- Phone: +1 (869) 662-6199
- Email: wakely.daniel@niagovkn.com

ANNEX G: Estimated RAP Implementation Budget

[Redacted from public version]