



CRITICAL ECOSYSTEM PARTNERSHIP FUND – CARIBBEAN HOTSPOT PROJECT  
(P173464)

## **Process Framework**

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## List of Acronyms

CANARI	Caribbean Natural Resources Institute
CEPF	Critical Ecosystem Partnership Fund
CI	Conservation International
CSAT	Collaborative Social Accountability Team
CSO	Civil Society Organization
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
INTEC	Instituto Tecnológico de Santo Domingo
KBA	Key Biodiversity Area
LOI	Letter of Inquiry
PAP	Project Affected Person
PF	Process Framework
RIT	Regional Implementation Team

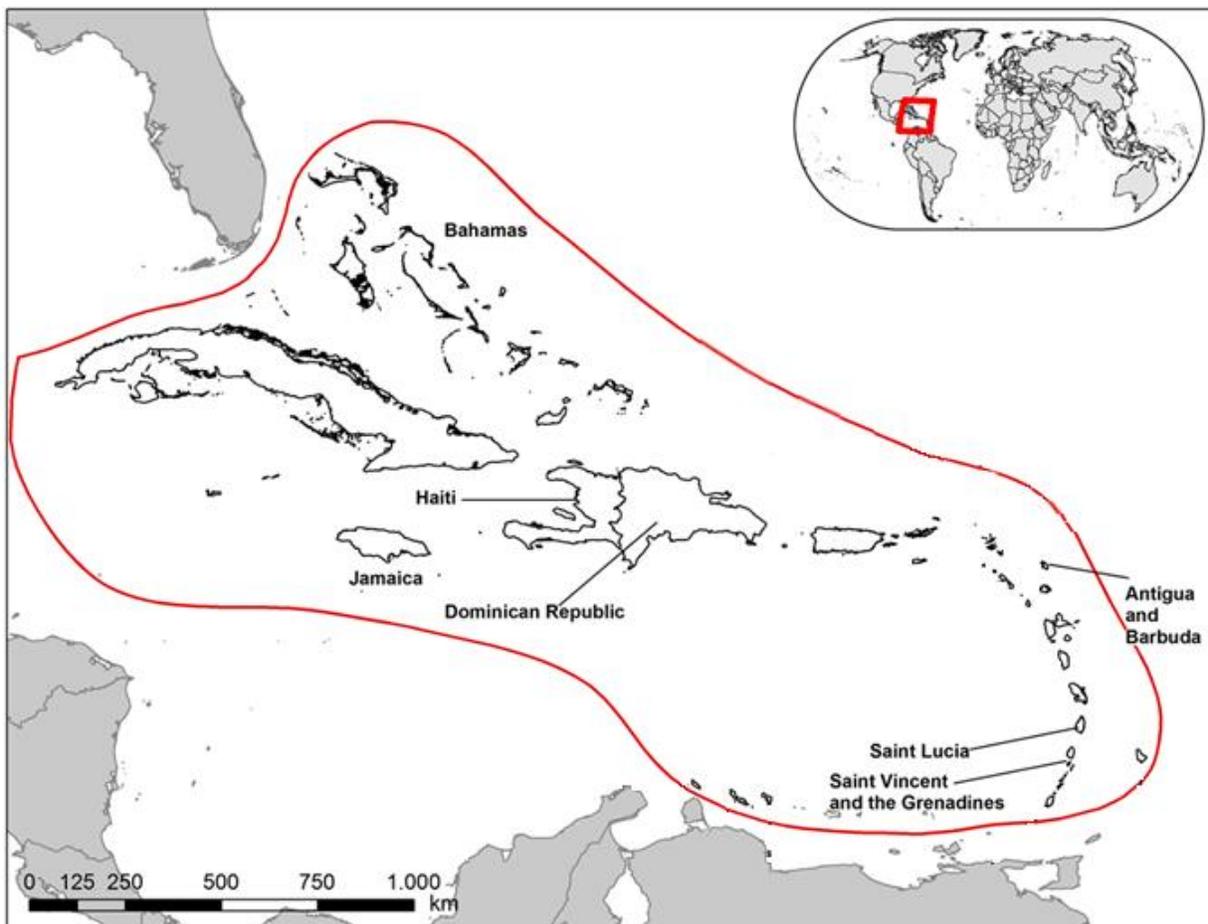
# 1 Introduction

This document represents the Process Framework (PF) for the Critical Ecosystem Partnership Fund (CEPF)'s Caribbean Hotspot Project (P173464), which is being implemented by Conservation International (CI). A process framework is prepared when Bank-supported projects may cause restrictions in access to natural resources in legally designated parks and protected areas. The PF establishes the participatory process to be adopted and followed when implementing restrictions on resource use through the establishment or enforcement of legally designated protected areas and/or parks. The PF outlines the way in which stakeholders, particularly those who may face access restrictions, will participate in the designing of potential interventions and the prioritizing of any actions designed to assist them. The document outlines how these stakeholders will be actively engaged throughout the project's life cycle. To achieve its aim, the PF will draw from established methods already utilized in the participating countries which are consistent with national and regulatory requirements.

## 1.1 Project Description

The project will support the operations of the Critical Ecosystem Partnership Fund (CEPF) in seven countries of the Caribbean Islands Biodiversity Hotspot: Antigua and Barbuda; The Bahamas; the Dominican Republic; Haiti; Jamaica; Saint Lucia; and Saint Vincent and the Grenadines (Figure 1).

**Figure 1. Project Countries**



CEPF is a donor partnership, which was created in 2000 to enable civil society to protect the world's biodiversity hotspots: biologically rich ecosystems that are essential to humanity, yet highly threatened. The World Bank is a founder member of CEPF. The objective of the Bank's involvement is to provide strategic assistance to non-governmental and private sector organizations for the protection of vital ecosystems in International Bank for Reconstruction and Development (IBRD) borrowing member countries that have ratified the Convention on Biological Diversity.

The project aims to improve the capacity of civil society organizations (CSOs) to reduce threats to globally important biodiversity in the Caribbean Islands Biodiversity Hotspot. It builds on actions, efforts and lessons learned under a previous phase of investment from 2010 to 2016 that require additional support for consolidation. It supports replication and scaling-up of good practice models, and incorporates lessons learned from the first phase to ensure enhanced implementation and continuity of action.

The project addresses the issue that globally important biodiversity of the Caribbean Islands Hotspot is threatened by overexploitation, habitat loss, and invasive alien species. To achieve this, it seeks to overcome two key constraints: first that civil society organizations' capacity to implement conservation actions is constrained by administrative, financial and technical limitations; and second that CSOs' ability to deliver conservation impact at scale is hindered by isolation, lack of coordination and weak dissemination of good practice. To this end, the project has five components, in which the activities of Component 1 can lead to restrictions of access.

**Component 1: Increased Share of Land and Sea in and around Priority Key Biodiversity Areas under Improved Management.** This component will support a grant mechanism that focuses on building capacity of CSOs to reduce threats to globally important biodiversity. This will include strengthening legal protection for priority sites and activities that will enhance protection and sustainable management of Key Biodiversity Areas (KBAs), such activities can lead to restriction of access to natural resources. At the site scale, grant-making will support conservation actions in and around 32 priority KBAs: sites that contribute significantly to the conservation of global biodiversity. Calls for proposals will be issued in a manner to attract project ideas that will cumulatively generate impacts in a clearly defined geographical area.

Sub-component 1.1 will finance technical and legal processes to strengthen the legal protection for priority sites that are currently unprotected or under protected. This may include increased "policing" or monitoring of these areas to ensure that persons are not exploiting the resources. Sub-component 1.2 will finance activities that contribute to the protection and sustainable management of biodiversity in the wider landscape around priority KBAs. Some of these KBAs are located within landscapes used for agriculture or forestry. Thus, restrictions can occur.

Some priority KBAs are too small to support globally important biodiversity and the ecological processes on which they depend into the long term. Consequently, there is a need for complementary conservation actions in the surrounding landscape to buffer KBAs from threats, maintain ecological connectivity and facilitate gene flow essential to ensure that species populations retain long-term viability. To this end, CEPF grant making will also target seven priority corridors, covering 2.3 million hectares, and engage CSOs able to work in these areas.

**Component 2: Increased Capacity of CSOs in Conservation.** This component will further strengthen the capacity of local, national and regional civil society in the conservation and sustainable use of biodiversity

through targeted capacity development activities (such as classroom-based trainings in proposal design, project cycle management, gender mainstreaming, and managing environmental and social risks, hands-on mentoring, and development of online training materials) and dedicated knowledge exchanges.

This component will be executed through a combination of grants to CSOs, to build local, national and regional institutional capacity and foster stakeholder collaboration, and direct training and mentoring of CSOs by the Regional Implementation Team (RIT).

**Component 3: Increased Capacity of RIT in Leadership and Coordination of CSO Conservation Actions.**

This component will strengthen the role and widen the responsibilities of the RIT vis-à-vis the CEPF Secretariat. The RIT is central to the delivery of Components 1, 2 and 4, because it provides strategic leadership and local knowledge to build a broad constituency of CSOs working across institutional and political boundaries toward achieving the conservation goals described in the ecosystem profile. The RIT's major functions and specific activities will be based on approved terms of reference. Capacity building for the RIT will be provided by the CEPF Secretariat.

**Component 4: Strengthened CSO Partnerships for Conservation.** The conservation challenges that threaten globally important biodiversity in and around the priority KBAs tend to be too complex for any organization to solve working in isolation. In the context of the project, this requires CSOs to work with one another and in close coordination with local and national governments, private landowners and local communities to co-create analyses of and solutions to conservation challenges in non-confrontational ways. This approach, termed collaborative social accountability, will be adopted by the project to facilitate partnerships of CSOs and other stakeholders to design and implement conservation actions in and around priority KBAs.

In the Dominican Republic, Antigua and Barbuda, Jamaica and Saint Lucia, this component will be led by the Collaborative Social Accountability Team (CSAT), hosted at the Instituto Tecnológico de Santo Domingo (INTEC), with co-financing support and oversight from the World Bank's Global Partnership for Social Accountability. In The Bahamas, Haiti and Saint Vincent and the Grenadines, this component will be led by the RIT, learning from the experience of INTEC.

**Component 5: Project Management, including M&E.** All activities related to administration and supervision of the project, communication, procurement and financial management as well as monitoring and reporting will be covered under this component. The Project Implementation Unit will be the CEPF Secretariat, working in partnership with the RIT, and in close collaboration with the CSAT. Under this component, communication on the project, including gathering lessons learned from the implementation will be financed.

The only activities with the potential to introduce new or more stringent restrictions on natural resource use are those under Component 1, where grants will be awarded to CSOs for actions that address threats to globally important biodiversity. Some of these grants are expected to involve creation or expansion of legally designated protected areas. In other parts of the world, protected area establishment has been associated with involuntary resettlement of local people. While no activities supported under the project will involve physical resettlement of people (whether voluntary or involuntary), protected area creation and expansion nonetheless carries a risk of adverse impacts on local people, including loss of income, diminished social cohesion, reduced economic resilience and loss of cultural identity, through introducing new restrictions on land use and access to natural resources.

Other grants awarded under Component 1, while they may not involve creation or expansion of protected areas, may strengthen restrictions on access to natural resources within existing legally designed protected areas, for instance by preparing a new management plan or supporting community ranger patrols. Again, these activities may have adverse impacts on local people, including loss of income, diminished social cohesion, reduced economic resilience and loss of cultural identity. Persons with a greater level of dependency on natural resources may be more severely impacted, and they may include some of the most vulnerable members of society (e.g., landless, women-headed households, elderly, etc.).

## 1.2 Justification for the Development of a Process Framework

The World Bank's ESS 5- Land Acquisition, Restrictions on Land Use and Involuntary Resettlement governs any adverse impacts on livelihoods as a result of Bank funded activities which are caused by:

- a) Land rights or land use rights acquired or restricted through expropriation or other compulsory procedures in accordance with national law;
- b) Land rights or land use rights acquired or restricted through negotiated settlements with property owners or those with legal rights to the land, if failure to reach settlement would have resulted in expropriation or other compulsory procedures;
- c) Restrictions on land use and access to natural resources that cause a community or groups within a community to lose access to resource usage where they have traditional or customary tenure, or recognizable usage rights. This may include situations where legally designated protected areas, forests, biodiversity areas or buffer zones are established in connection with the project;
- d) Relocation of people without formal, traditional, or recognizable usage rights, who are occupying or utilizing land prior to a project specific cut-off date;
- e) Displacement of people as a result of project impacts that render their land unusable or inaccessible;
- f) Restriction on access to land or use of other resources including communal property and natural resources such as marine and aquatic resources, timber and non-timber forest products, fresh water, medicinal plants, hunting and gathering grounds and grazing and cropping areas;
- g) Land rights or claims to land or resources relinquished by individuals or communities without full payment of compensation; and
- (h) Land acquisition or land use restrictions occurring prior to the project, but which were undertaken or initiated in anticipation of, or in preparation for, the project.

This Process Framework covers points c and f because while the project will not finance any civil work, it will finance activities that will result in restrictions of access to resources for some project stakeholders. The legal protection strengthening activities of Sub-components 1.1 and 1.2 could result in some restrictions on access to land traditionally utilized by populations in the priority areas for agriculture and forestry. At this stage, it is not possible to predefine the extent of the livelihood impacts of the proposed restrictions and also to specify the appropriate livelihood interventions. Consequently, the PF has been developed as a guide for the participatory process to be followed in implementing restrictions on land and resource usage.

### 1.3 Objectives of the Process Framework

The PF establishes the process through which meaningful consultations and negotiations with members of potentially project affected communities will take place. The PF outlines the procedures that will allow project affected persons (PAPs) to participate in the determination of any measures that may become necessary to mitigate and/or minimize the impacts of their restricted access to resources. The specific objectives of the PF are to provide a framework to:

1. Identify Potentially Affected groups
2. Determine of Eligibility Criteria
3. Identify alternative livelihood activities
4. Consultation and participation

## 2 Identification and Eligibility of Potentially Affected Persons

### 2.1 Identification of Potentially Affected Persons

A social assessment will be conducted to determine the potential project affected persons (PAPs) who will be the targets of the PF. Individuals and groups that will be targeted by this PF include those that use natural resources in/from any of the areas that are already designated and/or those that will be designated as protected areas as part of the project. Consequently, a PAP is a person that depends on access to the natural resources in the aforementioned protected areas to earn their livelihood. In compliance with ESS 5, para. 10, potentially affected persons can be classified as follows:

1. Who have formal legal rights to land or assets;
2. Who do not have formal rights to land or assets, but have a claim to land or assets that is recognizable under national law;
3. Who have no recognizable legal right to the land or assets they occupy or use.

The eligibility of persons to be classified as PAPs will be determined by a participatory process to determine the exact number and scope of impacts to be compensated for by the project. Special consideration will be given to any identified affected vulnerable groups. Non-local community members accessing the project area for any illegal purposes will not be eligible to receive project benefits. The project will work with PAPs, CSOs, local leaders etc. to define the eligibility criteria for livelihood assistance and to define a cut-off date. The determined cut-off date will be advertised to the PAPs in a manner that is accessible to them. Additionally, adequate pictures and other documentation will be taken of the area as evidence of the livelihood activities that exist prior to the cut-off day and to avoid individual falsely claiming livelihood assistance or asserting that they were unaware of the cut-off date. Any illegal occupant or exploitation of the natural resources of the protected area after the cut-off date will not be eligible for any type of livelihood assistance.

#### 2.1.1 Vulnerable Populations

Vulnerable populations for this project include those individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or indigenous status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is

also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. In the context of the project it includes *inter alia*, women, members of women-headed households, unemployed young people, elderly people, LGBTI persons, persons with disabilities, members of poor households, members of landless households. In Jamaica, the vulnerable groups would include the Jamaican Maroons who are located in the Cockpit Country and the Blue and John Crow Mountains. In the Dominican Republic, specific vulnerable groups include Haitian immigrants present in Jaragua, Lago Enriquillo e Isla Cabritos and Sierra de Bahoruco National Parks, and Miguel Domingo Fuerte Natural Monument, which are located in Pedernales province and who are mainly undocumented and whose livelihoods depend heavily on the natural resources to which their access will be restricted and who have less diversified sources of income. These vulnerable populations are less likely to recover from a loss of livelihood.

Consequently, the project will pay special attention to ensure that vulnerable populations are properly identified and incorporated. The project will ensure that this category of PAPs will have access to information on the project, especially as it relates to livelihood assistance, and will be included in the decision-making process for the same. Additionally, any alternative livelihood activities carried out within project-affected communities will ensure the inclusion of vulnerable groups.

## 2.2 Determining Eligibility

Where applicable, the project will aim to assist PAPs in an effort, to at a minimum, restore their livelihoods to pre-project levels prior to the project-led restrictions to access. Access to the livelihood restoration activities will require that persons fulfil certain eligibility criteria. Potentially affected communities will be involved in identifying any adverse impacts, assessing of the significance of impacts, and establishing of the criteria for eligibility for any mitigating or compensating measures necessary. These criteria will be determined by potentially affected stakeholders, including those in the vulnerable groups category. The criteria will be developed in collaboration with CSOs and other organisations/stakeholders involved in and/or integral to project/ sub-project implementation.

This section outlines the minimum eligibility criteria which will be expanded during project implementation, but prior to the start of any activities that could restrict access. The eligibility criteria will be limited to persons whose livelihoods have been adversely affected by loss of access to resources as a direct result of project activities. The criteria will also contain a process determining the losses. Eligibility criteria will need to consider the claims of people engaging in illegal, destructive or unsustainable resource uses. While ESS 5 guidelines consider the loss of livelihoods associated with these activities, careful consideration must be made to avoid incentives that would encourage these forms of activities. Any income recovery activities will not further encourage illegal, destructive or unsustainable livelihoods.

## 3 Project Activities Phases

The project, in a consultative fashion, will carry out the activities to define access restriction to activities in the protected areas, and will evaluate the impact on local livelihoods in consultation with the affected people and relevant stakeholders. The project will strive to avoid, and if not possible, minimize or mitigate impacts, such as phasing in measures. The project will ensure to initiate any access restrictions once the project alternative livelihoods are already initiated. For instance, if land use for agriculture will become part of the project activities, the support needed for the impacted households/individuals will be provided

to ensure they can transition their livelihoods and not be worse off as a result of the project. Thus, compensation and livelihood restoration measures will begin ahead of any potential project impact.

## 4 Livelihood Recovery Measures for Affected Persons

The aim of any livelihood support activity is to compensate for and promote the sustainable diversification of the livelihoods of persons affected by the restrictions to access of natural resources, while maintaining the sustainability of the park or protected area concerned. The project will support the provisions for alternative livelihood opportunities for PAPs. An inclusive and participatory method shall be used to determine the appropriate alternative livelihoods for PAPs. This process will be driven by equity and will involve community decision-making. Affected community members will be mobilized to ensure that they are able to meaningfully consider all of the alternative livelihood options that are available to them. Any potential alternative activities must be culturally appropriate and sustainable in the long term.

Any sub-grantee whose sub-project activities introduce new or strengthen existing restrictions on land use or access to natural resources will be required to prepare a sub-project-level process framework. This document will, *inter alia*, define criteria for establishing the eligibility of PAPs and set out measures to assist them. Specifically, it will describe the measures that will be taken to assist affected persons, as well as the methods and procedures by which communities will identify and choose potential mitigating or compensating measures to be provided to persons adversely affected, and the procedures by which adversely affected community members will decide among the options available to them.

These measures will vary among sub-projects, according to the nature of the restrictions anticipated, and the prevailing socio-economic conditions. A common feature will be authentic engagement with PAPs, throughout the sub-project cycle, through a process of stakeholder engagement in line with the requirements of ESS10. A key step in this process will be definition of a shortlist of livelihood options by the sub-grantee, based upon experience at other sites with similar contexts, review of literature, and consultations with community leaders, staff of other development projects and other stakeholders at the project site. This shortlist will then be refined through meetings with the affected community, to arrive at a list of livelihood restoration options appropriate to the local socio-economic conditions and of interest to the community. The feasibility of each option will then be assessed by the sub-grantee, through market analysis, farm-level agronomic surveys, cost-benefit analysis or other appropriate methodologies, to arrive at a final list of options. Consultations will then be held with PAPs on an individual, household or household-group basis, to select from the final list one or more livelihood restoration option that meets their particular circumstances and interests.

At all stages of this process, the sub-grantee will ensure that perspectives of women and other vulnerable groups are obtained, and their interests are taken into account. This may require intra-household analysis in cases where women's and men's livelihoods are affected differently. Women's and men's preferences in terms of compensation mechanisms, such as alternative access to natural resources, will be explored.

### 4.1 Alternative Livelihood Opportunities

The affected communities will be responsible for determining the type of alternative livelihoods they would want to implement. This process will be facilitated and supported by the CSO receiving grants for relative activities under Component 1; none of which has yet been identified. There are some

communities that may have pre-determined alternative opportunities that they would wish to pursue while others may require guidance as to what are available viable options. Any alternative livelihood opportunities selected must seek to incorporate the tenets of sustainable resource usage. Alternative livelihoods must be inclusive for all affected persons and particularly the vulnerable populations.

Potential alternative livelihood opportunities could either seek to enhance current economic activities already underway or developing new economic activities. Potential alternatives for each category are listed below:

#### *Enhancing Current Economic Activities*

- Diversification, improvement and increased climate resilience of agricultural production through introducing new crops and techniques (e.g., green manure, drip irrigation, etc.).
- Value-addition to agricultural products.
- Provision of livestock and training in animal husbandry.
- Development of sustainable value chains for sustainably harvested non-timber forest products.

#### *Developing New Economic Activities*

- Development of community-based ecotourism and/or cultural tourism.
- Establishment of payments for ecosystem services (PES) mechanisms, such as to forest-adjacent communities for watershed protection/restoration.
- Introduction of agro-forestry.
- Introduction of beekeeping.
- Enhancing any local craft activities.

## 5 Consultation and Participation

The sub-projects will undertake meaningful consultations. Consultations as part of the implementation of the PF will be the direct interactions of the relevant sub-grantee with the target group beneficiaries, affected persons and the local communities, as mentioned, above including the vulnerable groups. Community engagement will be continued in the project implementation stages using two-way processes involving communication, consultation, collaboration and empowerment mechanisms. **It must be noted that any consultation activities will follow proper COVID-19 protocols as detailed in the Bank's technical guidance "Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings,(March 20, 2020)" along with national guidelines.** All consultation proceedings will be appropriately documented and feedback considered in the implementation process.

The key steps that will be followed to ensure meaningful consultation with communities about the process framework include:

1. Identify key stakeholders/PAPs;
2. Ensure that project information is relevant, timely and in a language accessible to stakeholders;
3. Disseminate culturally appropriate information in advance and through the appropriate channels prior to start of consultations;

4. Commence consultations early and on an on-going basis to gather initial views on the project proposal and inform project design;
5. Encourage stakeholder feedback, especially to inform project design and engagement by stakeholders in the identification of E&S risks and impacts. This should be done on a continuous basis, as risks and impacts arise.
6. Incorporate the results of consultations into the project design or explain clearly to stakeholders why this may not be plausible;
7. Provide feedback to stakeholders/PAPs;
8. Document and disclose the consultation process.
9. Ensure that the consultation process is free of external manipulation, interference, coercion, discrimination and intimidation.

In the course of consultation, socio-cultural factors, such as the level of literacy, cultural and language barriers to participation of population, as well as appropriate reduction factors, e.g. extension of terms to ensure maximum participation given responsibilities of households, geographic dispersal, etc; and form corresponding to culture will be taken into account. Appropriate materials will be provided prior to consultation, which in form and language will be understandable to residents being consulted. Prior to access restrictions, the communities will have enough time to review and discuss the provided information.

Community members who will face restrictions to access will be provided support to mobilize themselves in order to determine eligibility criteria, identify eligible persons based on said criteria and determine viable alternative livelihoods in a participatory manner. The participatory approach will ensure that the process is inclusive and that all PAPs, including the vulnerable groups, will have a say in and be able to benefit from alternative activities. Once eligible persons have been identified through the participatory process, the activities will proceed as outlined below:

- a) PAP assessment, which will assist to map out their own resources and assets, identify and diagnose constraints and impacts due to access restrictions from household to community level, and identify the required support;
- b) Definition of the training and capacity building needed to sustain their affected livelihoods and way of transitions to alternative livelihoods;
- c) Definition of co-management arrangements and alternative livelihood activities to be supported including pertinent training.

## 6 Implementation Arrangements

Primary administrative responsibility for designing, implementing and monitoring and reporting on the process of engaging stakeholders, identifying adverse impacts on livelihoods caused by project activities, and establishing mechanisms to mitigate these adverse impacts rests with the Project Implementation Unit at the CEPF Secretariat, which is administered by CI on behalf of the CEPF donor partnership.

Within the Caribbean Islands Hotspot, the CEPF Secretariat will be supported by the RIT, which will help engage and strengthen CSOs through provision of training, technical support and small grants. The RIT will

be hosted at the Caribbean Natural Resources Institute (CANARI), a highly experienced institution working with CSOs in the Caribbean.

The direct conservation actions in and around priority sites that will take place under Component 1 will be supported through two types of sub-grant to CSOs. “Large grants” will be awarded directly by the CEPF Secretariat, which will provide oversight and technical support to the sub-grantees, including on compliance with environmental and social standards. “Small grants” will be awarded by the RIT, which will supervise and support the sub-grantees, including on compliance with the environmental and social standards.

Monitoring and supervision of sub-grantee compliance with the Process Framework by the CEPF Secretariat and the RIT will be complemented by participatory monitoring of project activities, as they relate to impacts on people. Participatory monitoring is a process through which PAPs and other stakeholders engage in monitoring of project activities, share control over the content, process and results of the monitoring activity, and engage in identifying or taking corrective actions. Where appropriate, sub-grantees will be requested and provided with guidance to incorporate participatory monitoring into the design of their projects, paying particular attention to the following principles:

- a) Treat PAPs and other stakeholders as active participants, not just sources of information;
- b) Build capacity of PAPs to analyze and reflect on the impacts of project activities and take action;
- c) Plan for joint learning with stakeholders at various levels;
- d) Make commitments to take corrective actions identified by PAPs and other stakeholders.

In light of the COVID-19 pandemic, monitoring of sub-grantee compliance with the Process Framework may need to take place remotely. As long as travel restrictions and other measures to control transmission of the COVID-19 virus remain in place, in-person supervision visits or meetings will be replaced by virtual interactions. To this end, any sub-grantees who lack access to online videoconferencing will be supported to acquire the necessary hardware, software and data. For any in-person meetings or visits, the CEPF Secretariat and RIT will adhere to physical distancing protocols and other precautions, such as those established by the World Bank Technical Note, “Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings, March 20, 2020”.

Sub-grantees are encouraged to design and implement projects in close collaboration with public sector partners, especially national and sub-national government agencies. Sub-project activities will be aligned with local and national public policy objectives by means of the collaborative social accountability platforms that will be developed under Component 4. While local administrations and line agencies at the priority sites will be involved in the design, conceptualization and implementation of sub-projects, financial and administrative responsibility for them will lie with the grantees, who will be CSOs.

The roles and responsibilities of the implementing agencies for the environmental and social process are set out in Table 1. Due to the different management and supervision arrangements for large and small grants, these are described separately.

**Table 1. Roles and Responsibilities of Parties Involved in the Environmental and Social Process**

<b>Role</b>	<b>Responsible party (large grants)</b>	<b>Responsible party (small grants)</b>
Preparation and submission of Letter of Inquiry (LOI)	Sub-grantee	Sub-grantee
Environmental and social risk assessment of LOIs	CEPF Secretariat	RIT
Provision of guidance to sub-grantee on compliance with requirements of PF	CEPF Secretariat	RIT
Preparation of sub-project-level PF template, guidance and worked examples	CEPF Secretariat	CEPF Secretariat
Assessment of adverse impacts and identification of potential PAPs	Sub-grantee	Sub-grantee
Design of livelihood recovery measures for PAPs	Sub-grantee	Sub-grantee
Preparation of sub-project-level PF and design of grievance redress mechanism	Sub-grantee	Sub-grantee
Public consultation disclosure at the project level	CEPF Secretariat	CEPF Secretariat
Public consultation disclosure at the sub-project level	Sub-grantee	Sub-grantee
Incorporation of components into sub-project design on strengthening sub-grantee’s legal and technical capacity to implement the sub-project-level PF	CEPF Secretariat	RIT
Review and approval of sub-project proposal and PF	CEPF Secretariat	RIT
Semi-annual reporting on compliance with requirements of PF	Sub-grantee	Sub-grantee
Monitoring and Supervision of sub-grantee compliance with requirements of PF	CEPF Secretariat (with assistance from RIT)	RIT (with supervision from CEPF Secretariat)

The sub-grantee will monitor the impacts of protect activities on potential PAPs, identify affected persons and provide them with appropriate livelihood options to improve (or at minimum restore) incomes, livelihoods and living standards. The RIT will monitor the performance and impacts of small grants, while documenting and disseminating lessons learned. The CEPF Secretariat will monitor the performance of large grants, with assistance from the RIT. It will also monitor performance of the RIT and the small grants portfolio, via regular communication and semi-annual supervision missions.

## 7 Grievance Redress Mechanism

Each CSO receiving a grant under Component 1 of the project will be required to establish a Grievance Redress Mechanism (GRM) for community members and other stakeholders. The GRM will provide a mechanism whereby affected persons may raise a grievance, at any time, and whereby this grievance may be considered and satisfactorily resolved. Where possible, GRMs will utilize existing formal or informal grievance mechanisms, supplemented as needed with sub-project-specific arrangements designed to resolve disputes in an impartial manner. The GRM design will be influenced by cultural attitudes toward submitting grievances (e.g., written or oral, named or anonymous), the number of languages spoken by stakeholders, the level of literacy, available technology and local gender considerations. Grievances should be easy and intuitive to submit, and the mechanism simple to understand.

The sub-grantee will inform stakeholders of the objectives of the sub-project, the requirements of the PF, and the existence of a GRM. Contact information of the sub-grantee, the RIT and the CEPF Secretariat will be made publicly available using locally appropriate means, such as posters, community meetings or radio broadcasts.

In the first instance, grievances should be submitted to the sub-grantee. However, in case that the claimant is not comfortable in raising the matter directly with the sub-grantee, they should have the option of raising it with the RIT. Upon receiving a grievance, the sub-grantee (or RIT) should confirm receipt with the claimant.

Grievances can be made anonymously, all reported grievances will be treated confidentially, and there will be no retribution to the claimant by the sub-grantee, RIT or CEPF Secretariat. The CEPF Secretariat and/or the RIT will conduct thorough investigations into any allegations of retaliation, abuse or discrimination to a claimant. Retribution to a claimant by the sub-grantee will be grounds for suspension or termination of the sub-grant.

Any grievances received by the sub-grantee must be reported to the CEPF Secretariat (or the RIT, in the case of small grants) within 15 days, together with a proposed plan to address the grievance. The CEPF Secretariat will maintain a log of grievances, which it will include in its annual reporting to the World Bank; serious incidents will be reported within 15 days.

If claimants are not satisfied with the way in which their grievance has been handled by the sub-grantee, they will be given the opportunity to raise it with the CEPF Executive Director via the CI Ethics Hotline. The CI Ethics Hotline consists of a toll-free telephone line (+1-866-294-8674) and a secure web portal (<https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>) that allows grievances to be made anonymously. Claimants can also put their grievance to the World Bank's Grievance Redress Service. (Figure 2). The RIT and CEPF Secretariat will aim to resolve all grievances within 60 days of receipt.

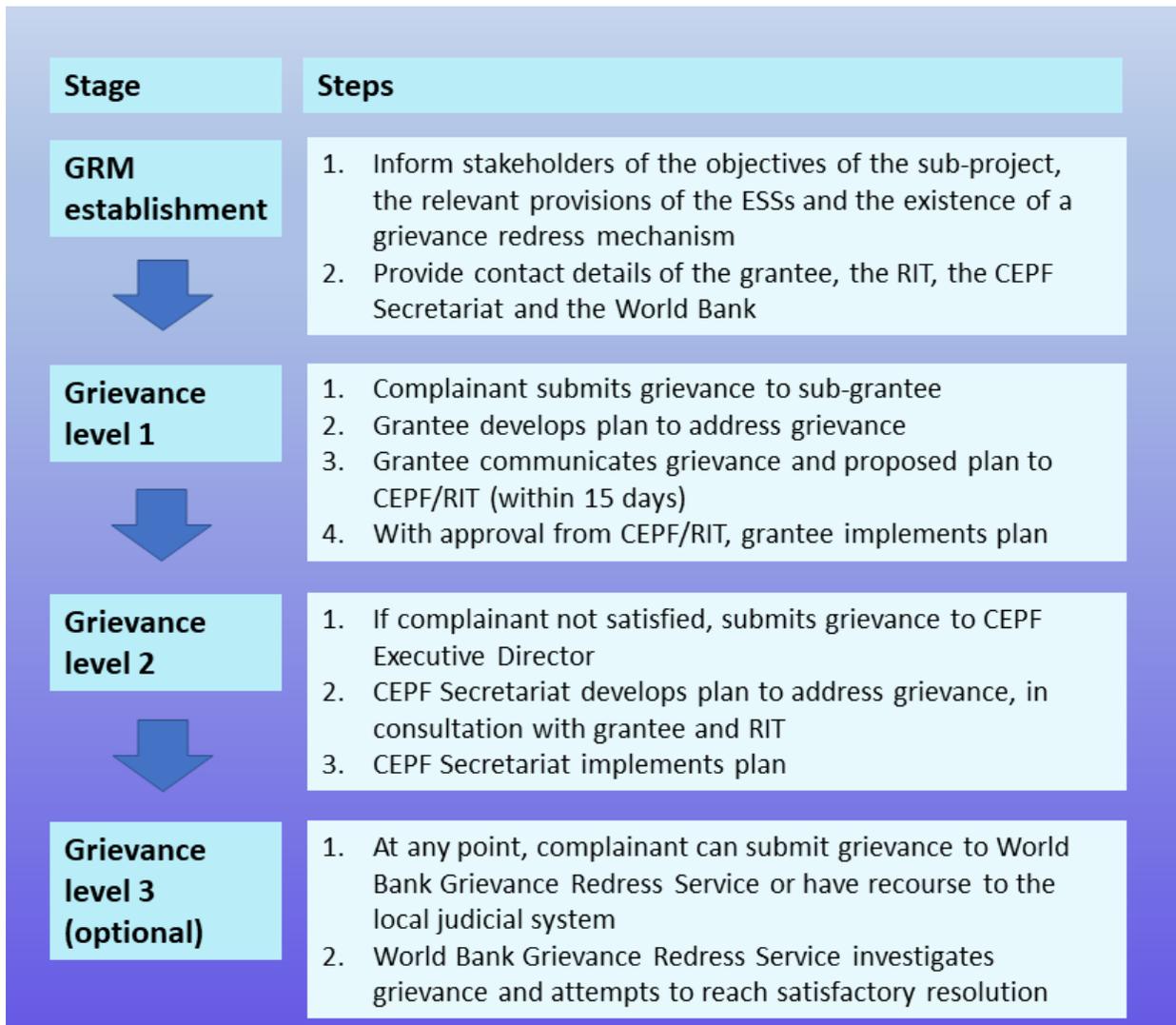
### **The World Bank Grievance Redress Service (GRS)**

The Grievance Redress Service (GRS) is an avenue for individuals and communities to submit complaints directly to the World Bank if they believe that a World Bank-supported project has or is likely to have adverse effects on them, their community, or their environment. The World Bank GRS can be found at the following URL link: <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>

Complaints must be completed in writing and addressed to the GRS. They can be submitted using the following methods:

1. Online, by completing the online form:  
<https://pubdocs.worldbank.org/en/743201426857500569/Grievance-Redress-Service-GRS-complaint-form.docx>
2. By email to [grievances@worldbank.org](mailto:grievances@worldbank.org)
3. By letter or by hand delivery to the World Bank Headquarters in Washington D.C., United States or any World Bank Country Office- printing and using this form:  
<https://pubdocs.worldbank.org/en/743201426857500569/Grievance-Redress-Service-GRS-complaint-form.docx>

**Figure 2. Grievance Redress Mechanism for Sub-projects**



## 8 Annex 1- Country Context – Antigua and Barbuda

### 8.1 Key Legislation and National Policy Context

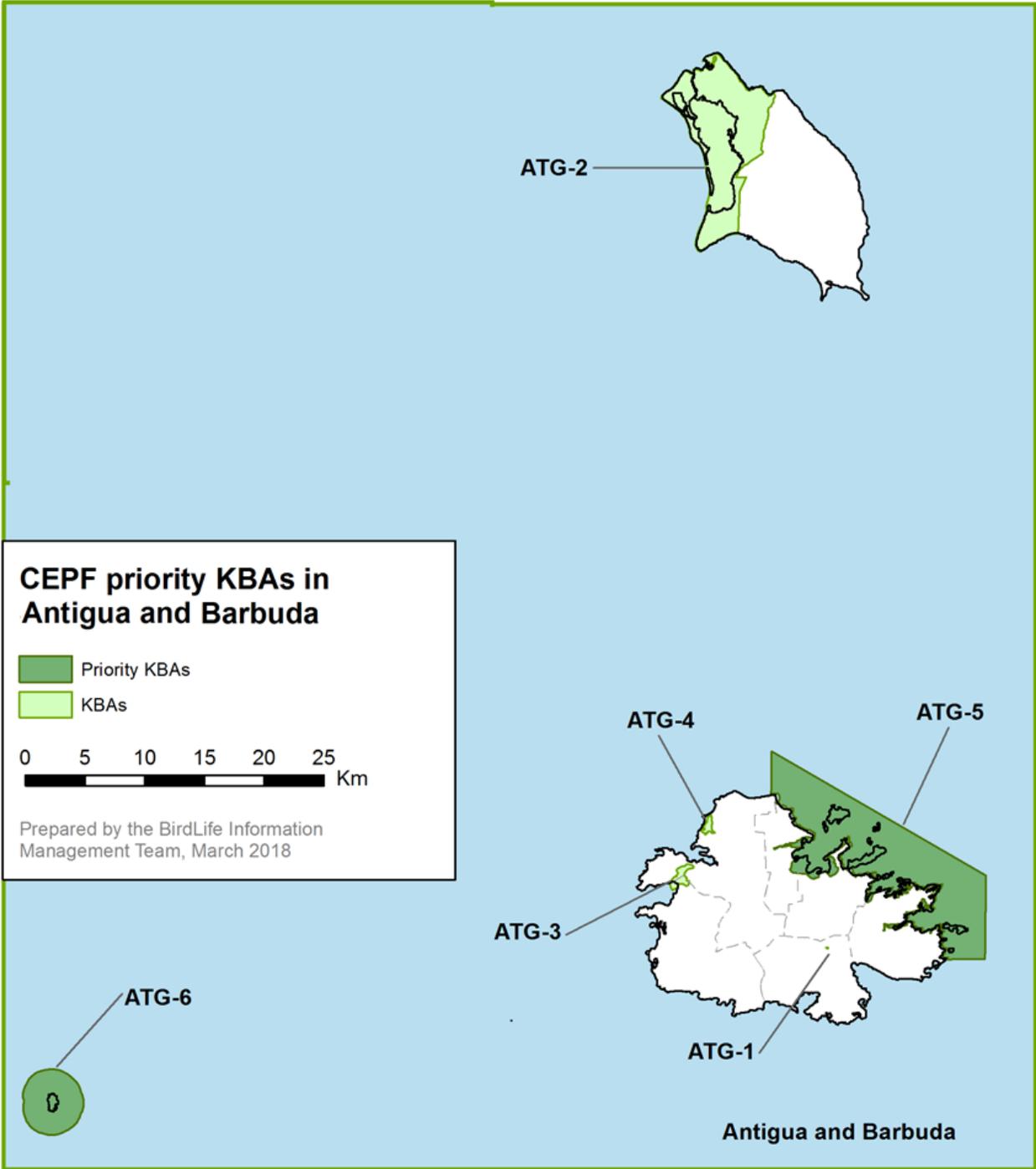
The national policy context in Antigua and Barbuda is provided by the Constitution (1981), which establishes right of protection from deprivation of property, and provides for compulsory acquisition of property for public purposes. A key piece of legislation is the National Parks Act (1985), which provides for establishment of and regulation of activities within protected areas. Another is the Environmental Protection and Management Act (2015), which provides for sustainable environmental protection and management, and allocates administrative responsibilities for environment management.

### 8.2 Potential PAPs

Potential PAPs comprise people who use land and/or natural resources within priority sites. There are two priority sites in Antigua and Barbuda. Redonda island is uninhabited. As project activities there will focus on the conservation of terrestrial habitats and not on the surrounding marine areas, there is no possibility of any adverse impact on people. Hence, there are no potential PAPs. North East Marine Management Area and Fitches Creek Bay is a legally designated protected area. Here, potential PAPs comprise people who could be potentially affected by strengthened restrictions on access to natural resources within the marine management area. About 8,000 people live in and around the priority site. A 2007 socio-economic study found that only 38 people had natural-resource dependent occupations (agriculture, forestry or fisheries); therefore, the number of potential PAPs is considered to be small. The same study found that most people involved in fishing did so as a part-time activity and had other means of livelihood. Moreover, it found that fish landed were not necessary caught within the marine management area. For these reasons, the magnitude of adverse socio-economic impacts on potential PAPs are anticipated to be limited and within the scope of CEPF grants to mitigate and compensate for.

### 8.3 Figures and Maps of KBAs

	Code	Site	Country	Land Area (ha)
1.	ATG-5	North East Marine Management Area and Fitches Creek Bay	Antigua and Barbuda	11,115
2.	ATG-6	Redonda	Antigua and Barbuda	2,130
<b>Total</b>				<b>13,245</b>



## 9 Annex 2- Country Context- The Bahamas

### 9.1 Key Legislation and National Policy Context

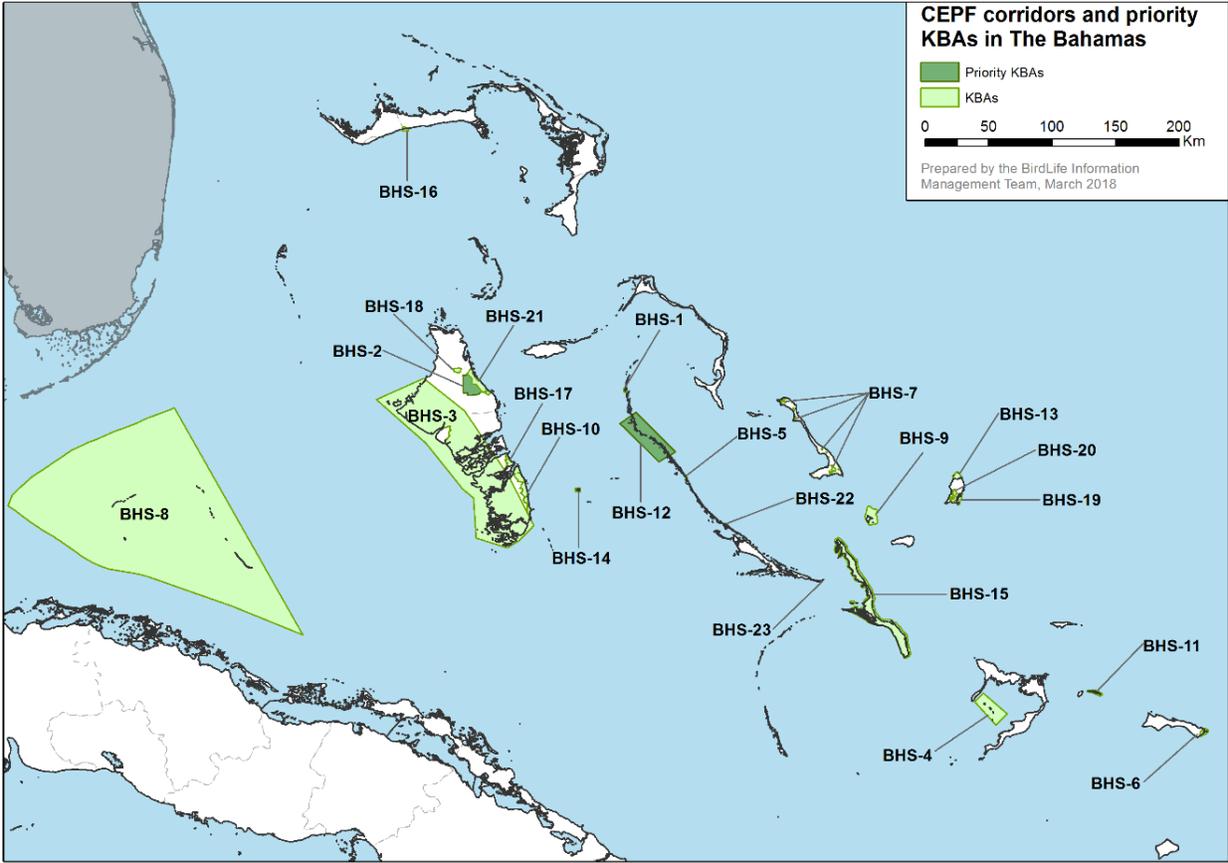
The national policy context for The Bahamas is provided by the Constitution (1973), which establishes the right of protection from deprivation of policy. A key piece of legislation in The Bahamas is the Conservation and Protection of the Physical Landscape of the Bahamas Act (1997), which provides for establishment of and regulation of activities within protected areas. Another is the Fisheries Resources Act (1977), which provides for the conservation and sustainable management of marine fisheries resources.

### 9.2 Potential PAPs

Potential PAPs comprise people who use land and/or natural resources within priority sites. There are two priority sites in The Bahamas. Both are legally designated as protected areas, hence potential PAPs comprise people who could be potentially affected by strengthened restrictions on access to natural resources within the protected areas. Exuma Cays Land and Sea Park is located in Exuma district, which has a total population of around 7,000 people, most of whom live on the larger islands, 50 km to the south of the priority site. Within the priority site, there are several luxury tourism resorts, which provide the major source of employment to local people. While some people are involved in fishing, this has not been a major source of income in recent years. The tourism industry in The Bahamas has been heavily impacted by the COVID-19 pandemic, and the extent to which this has caused the inhabitants of Exuma district to rely more heavily on fishing as a source of income would need to be assessed during the preparation of any CEPF sub-projects there, to identify potential PAPs. Andros Blue Holes National Park is located on Andros island, which has a total population of around 8,000 people, although very few live within the national park boundary. Tourism is the largest economic sector on the island, with dive tourism within the national park being one of the biggest draws. Fishing is another important sector but the focus is on marine fisheries, which are not impacted by the national park, which is inland. Project activities at Andros Blue Holes National Park are expected to have few or no adverse impacts on local people. Nevertheless, it will be necessary to assess the impacts of the COVID-19 pandemic on the tourism sector, to determine whether this may have caused some people to rely on natural resources within the national park.

### 9.3 Figures and Maps of KBAs

	Code	Site	Country	Land Area (ha)
1.	BHS-2	Andros Blue Holes National Park	Bahamas	13,479
2.	BHS12	Exuma Cays Land and Sea Park	Bahamas	60,223
<b>Total</b>				<b>73,702</b>



## 10 Annex 3- Country Context- The Dominican Republic

### 10.1 Key Legislation and National Policy Context

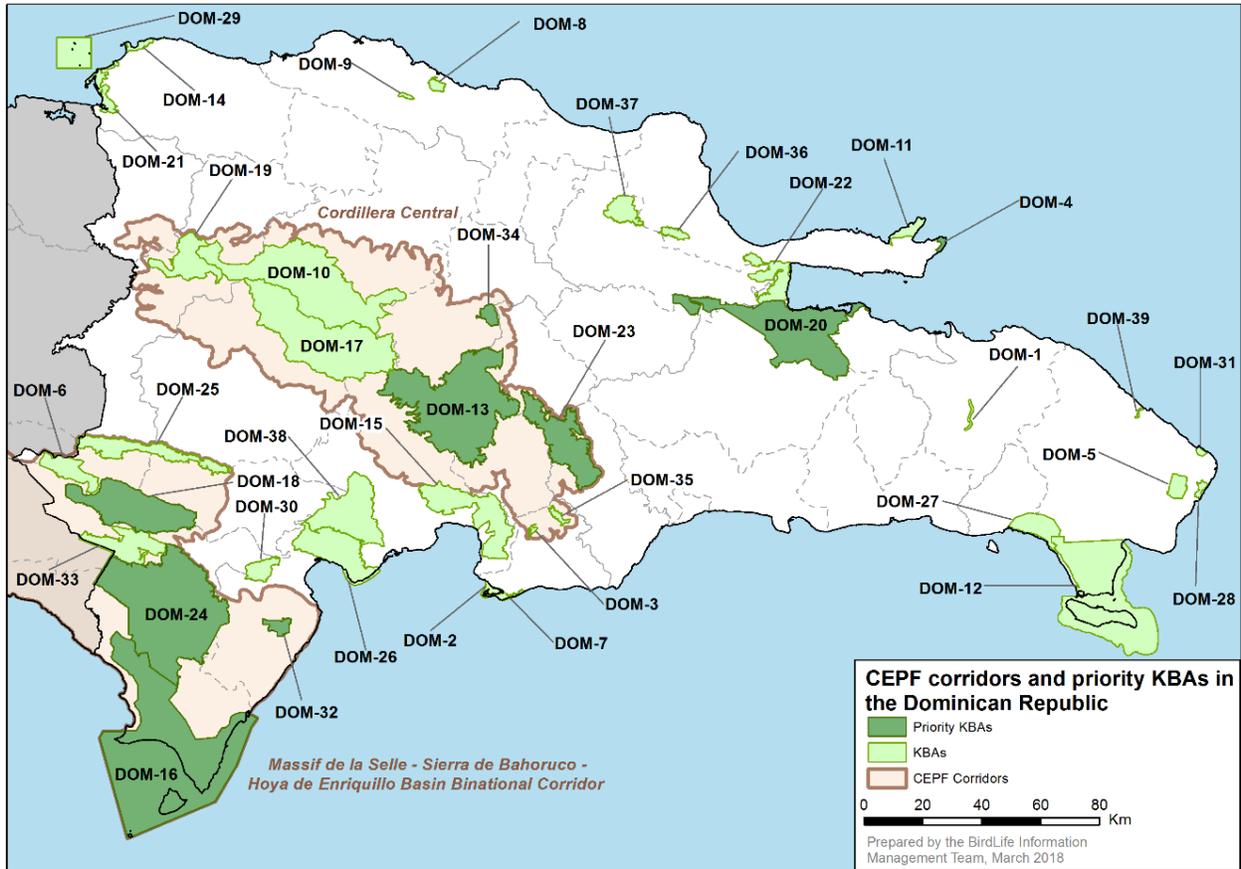
The national policy context for the Dominican Republic is provided by the Constitution (2015), which establishes the right to private property and provides for compulsory acquisition for a justified cause of public utility or of social interest, subject to compensation. A key piece of legislation is the Protected Areas Law (2004), which provides for establishment of and regulates activities within protected areas. Another is the General Law on Environment and Natural Resources (2000), which establishes norms for conservation, protection, rehabilitation, restoration and sustainable use of the environment and natural resources.

### 10.2 Potential PAPs

Potential PAPs comprise people who use land and/or natural resources within priority sites. There are nine priority sites in the Dominican Republic, all of which are legally designated as protected areas. Therefore, potential PAPs comprise people who could be potentially affected by strengthened restrictions on access to natural resources within the protected areas. These protected areas are mostly located in mountainous areas or remote coastal areas with low human population density. For the local communities living around the priority sites, the main sources of employment and economic activity (agriculture, forestry, fisheries, tourism, services) are located outside the protected area boundaries, and will not be adversely affected by project activities. Potential PAPs are limited to the small proportion of people at each site who exploit natural resources within the protected areas. It should be noted that many of these activities are illegal, destructive or unsustainable.

### 10.3 Figures and Maps of KBAs

	Code	Site	Country	Land Area (ha)
1.	DOM-4	Monumento Natural Cabo Samaná	Dominican Republic	931
2.	DOM-13	Parque Nacional Dr. Juan Bautista Pérez Rancier (Valle Nuevo)	Dominican Republic	90,915
3.	DOM-16	Parque Nacional Jaragua	Dominican Republic	156,092
4.	DOM-18	Parque Nacional Lago Enriquillo e Isla Cabritos	Dominican Republic	40,575
5.	DOM-20	Parque Nacional Los Haitises	Dominican Republic	63,408
6.	DOM-23	Parque Nacional Montaña La Humeadora	Dominican Republic	30,646
7.	DOM-24	Parque Nacional Sierra de Bahoruco	Dominican Republic	109,423
8.	DOM-32	Refugio de Vida Silvestre Monumento Natural Miguel Domingo Fuerte (Bahoruco Oriental)	Dominican Republic	3,362
9.	DOM-34	Reserva Científica Ébano Verde	Dominican Republic	2,999
<b>Total</b>				<b>498,351</b>



## 11 Annex 4- Country Context- Haiti

### 11.1 Key Legislation and National Policy Context

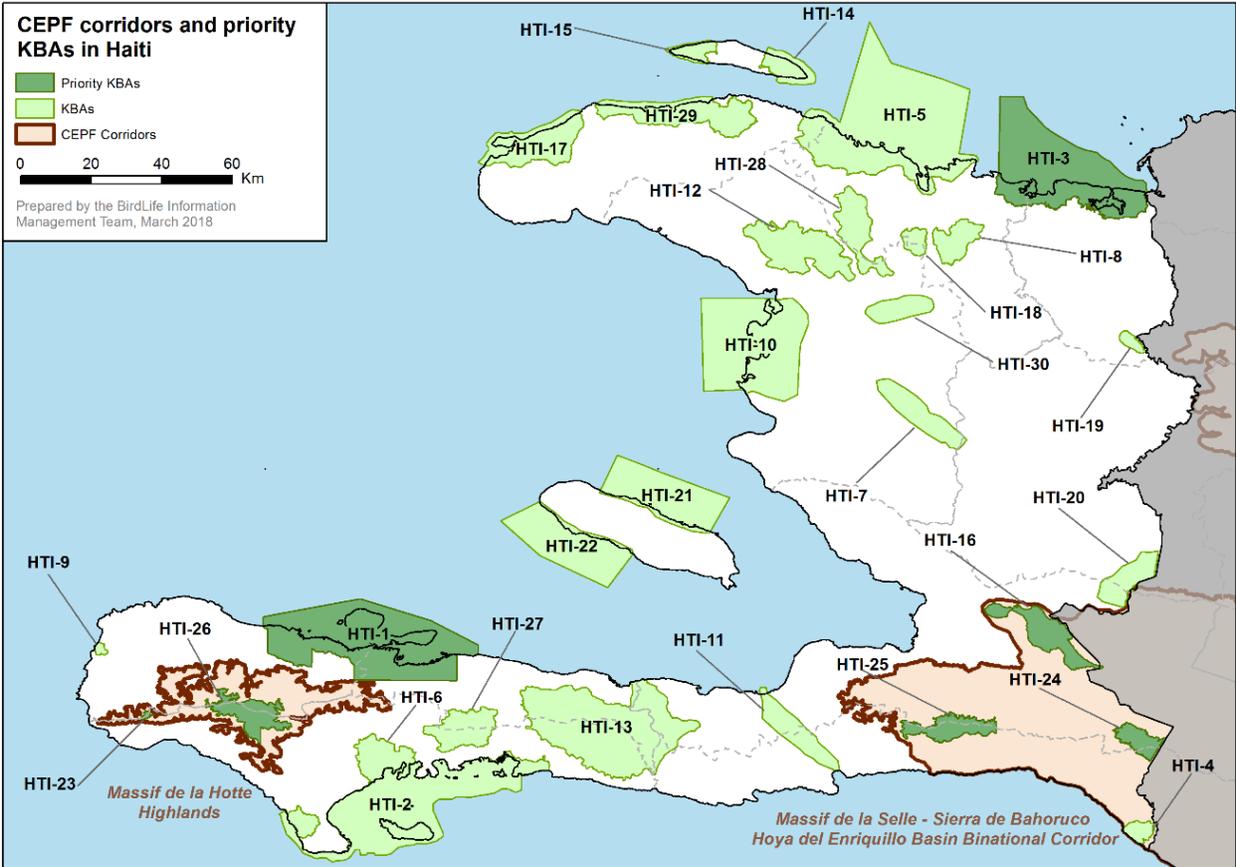
The national policy context for Haiti is provided by the Constitution (1987), which establishes the right to private property and the legal process for expropriation. A key piece of legislation is the Decree on Naming National Parks, National Sites and Natural Sites (1968), which provides for the establishment of protected areas. Another is the Rural Code (1962), which provides for regulation of exploitation of forest resources.

### 11.2 Potential PAPs

Potential PAPs comprise people who use land and/or natural resources within priority sites. There are seven priority sites in Haiti. Six of them are legally designated as protected areas, while the seventh (Lac Azuéli – Trou Caiman) is unprotected. Within the protected areas, existing regulations already restrict access to land and natural resources. However, low capacity of government agencies mandated to manage these areas, combined with high levels of poverty, mean that levels of dependency on natural resources within these protected areas are significantly higher than for priority sites in other project countries. Strengthened restrictions on access to natural resources within these protected areas (mainly through incentives to comply with existing regulations) are necessary to prevent further degradation of natural capital and consequent adverse impacts on local livelihoods. Potential PAPs comprise people who could be potentially affected by these activities. Detailed social assessment will be required to identify potential PAPs under each sub-grant, with particular attention being given to vulnerable groups, including women, unemployed young people, members of landless households, etc. Lac Azuéli – Trou Caiman priority site comprises two saline lakes, to the east of Port-au-Prince. Human communities live around the lakes, in settlements on former plantations. The main form of natural resource use is fishing, which takes place on a small scale, using artisanal methods. If any controls on natural resource use are introduced at the priority site under the project, the number of PAPs and the scale of adverse impacts are expected to be limited, and within the scope of CEPF grants to mitigate and compensate for.

### 11.3 Figures and Maps of KBAs

	Code	Site	Country	Land Area (ha)
1.	HTI-1	Aire Protégée de Ressources Naturelles Gérées de Baradères-Cayemites	Haiti	87,920
2.	HTI-3	Aire Protégée de Ressources Naturelles Gérées des Trois Baies	Haiti	75,500
3.	HTI-16	Lac Azuéli – Trou Caiman	Haiti	16,317
4.	HTI-23	Parc National Naturel de Grand Bois	Haiti	372
5.	HTI-24	Parc National Naturel Forêt des Pins-Unité 1	Haiti	6,799
6.	HTI-25	Parc National Naturel La Visite	Haiti	11,455
7.	HTI-26	Parc National Naturel Macaya	Haiti	13,486
<b>Total</b>				<b>211,849</b>



## 12 Annex 5- Country Context- Jamaica

### 12.1 Key Legislation and National Policy Context

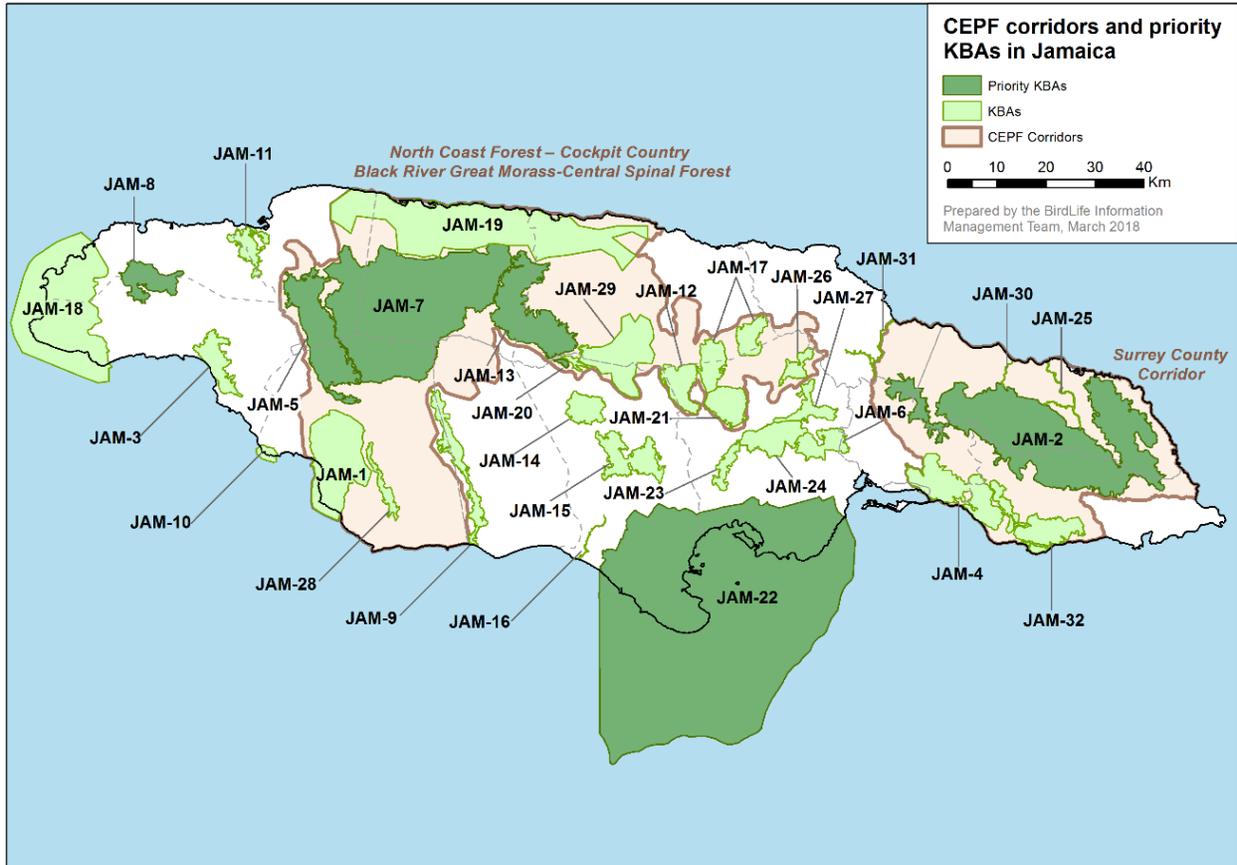
The national policy context for Jamaica is provided by the Constitution (1962; amended), which establishes the right of protection against compulsory acquisition of property. A key piece of legislation is the Natural Resources (National Parks) Regulations (1993), which establish management regulations for national parks. Others include the Forest Regulations (2001), which establish rights and processes for management and sustainable use of forests and forest resources, and the Fishing Industry (Special Fishery Conservation Area) Regulations (2012), which provide for designation and setting of management regulations for special fishery conservation areas.

### 12.2 Potential PAPs

Potential PAPs comprise people who use land and/or natural resources within priority sites. There are seven priority sites in Jamaica, which have varying degrees of protection. Blue and John Crow Mountains Protected National Heritage and surroundings, and Portland Bight Protected Area are largely or fully included within legally designated protected areas. The other five sites are all partly included within legally designated protected areas but with the majority of the site unprotected. With the exception of Portland Bight Protected Area (which is fully protected), the priority sites are located in the mountainous interior of Jamaica, which is relatively sparsely populated compared with the coast, where the main centers of population are located. Nevertheless, several priority sites have significant human populations living around and, in some cases, within them. People living or with agricultural land within priority sites are considered potential PAPs, because of the risk of adverse impacts from protected area creation and expansion. People living around existing protected areas who depend on extraction of natural resources for at least part of their income constitute another category of potential PAPs, because of the risk of adverse impacts from sub-projects that strengthen the implementation of existing regulations. For both groups, sub-grantees will be required to identify potential PAPs, engaged them at all stages of the sub-project cycle, and ensure that and adverse impacts are avoided, minimize or mitigated, to the extent possible. Particular attention will be given to vulnerable groups, who, in the case of Jamaica, include maroons. One maroon community is located within Cockpit Country, while three are located in and around Blue and John Crow Mountains Protected National Heritage and surroundings.

### 12.3 Figures and Maps of KBAs

	Code	Site	Country	Land Area (ha)
1.	JAM-2	Blue and John Crow Mountains Protected National Heritage and surroundings	Jamaica	60,497
2.	JAM-5	Catadupa	Jamaica	15,785
3.	JAM-7	Cockpit Country	Jamaica	64,139
4.	JAM-8	Dolphin Head	Jamaica	5,389
5.	JAM-13	Litchfield Mountain - Matheson's Run	Jamaica	16,013
6.	JAM-20	Peckham Woods	Jamaica	239
7.	JAM-22	Portland Bight Protected Area	Jamaica	197,957
<b>Total</b>				<b>360,019</b>



## 13 Annex 6- Country Context- Saint Lucia

### 13.1 Key Legislation and National Policy Context

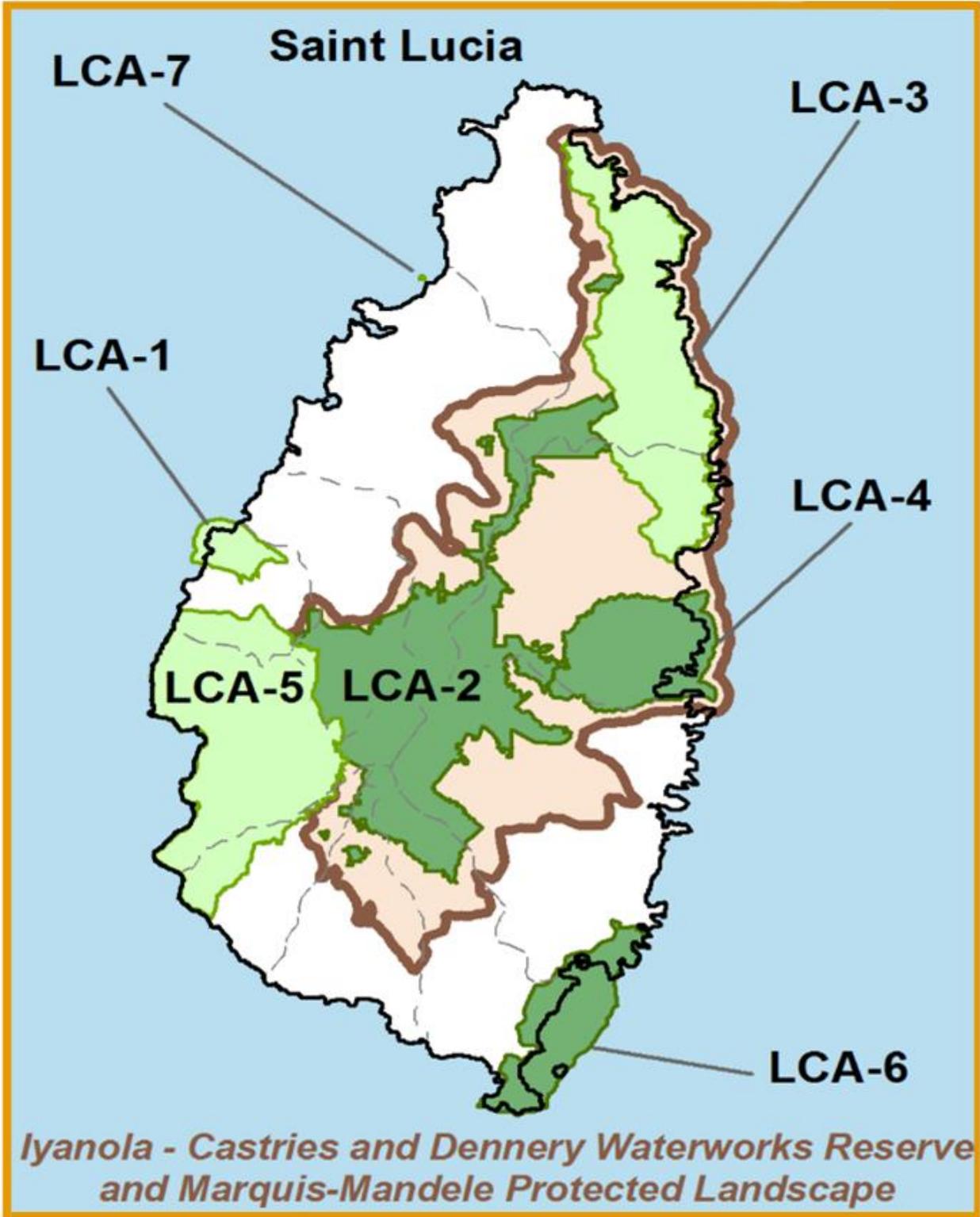
The national policy context for Saint Lucia is provided by the Constitution (1978), which establishes the right of protection from deprivation of property and provides for compulsory acquisition of property for public purposes. A key piece of legislation is the Fisheries Act (1984), which provides for the conservation and sustainable management of marine fisheries resources, including the establishment of marine reserves.

### 13.2 Potential PAPs

Potential PAPs comprise people who use land and/or natural resources within priority sites. There are three priority sites in Saint Lucia, which have varying degrees of protection. Castries and Dennery Waterworks Reserve and Marquis is legally designated as a government forest reserve. There are no human settlements within the reserve, and few or no human activities, apart from forest management, recreation and tourism. Because the main threats to globally important biodiversity at the site are invasive alien species, sub-projects are not anticipated to strengthen existing restrictions on access to natural resources. For this reason, there are anticipated to be few or no potential PAPs at the site. Mandelé Protected Landscape is partly protected but this protection is limited to coastal and marine ecosystems, while the dry forest ecosystem that supports most of the site's global biodiversity values remains unprotected. The dry forest contains extensive areas of cultivation, while extractive forms of natural resource use are practiced, including harvesting of palm stems to produce broom handles. Sub-projects may seek to limit further expansion of these activities, which directly threaten globally important biodiversity. Hence, potential PAPs include people involved in farming and forest product harvesting within the priority site. These people represent the minority of inhabitants of Praslin quarter, which number around 2,000. The third priority site, Pointe Sable, is largely protected within a legally designated national park. The priority site is located in Vieux Fort quarter, a part of Saint Lucia with relatively high levels of poverty and unemployment. The total population of the quarter is around 16,000 people, of whom some are engaged in activities that threaten globally important biodiversity, including unauthorized harvesting of mangrove for charcoal, clearance of upland forest, and quarrying. Addressing these threats may require reinforcing and/or incentivizing compliance with existing regulations. Any sub-grants involving such activities will need to identify potential PAPs and develop appropriate strategies to minimize and mitigate potential adverse impacts.

### 13.3 Figures and Maps of KBAs

	Code	Site	Country	Land Area (ha)
1.	LCA-2	Castries and Dennery Waterworks Reserve and Marquis	Saint Lucia	7,886
2.	LCA-4	Mandelé Protected Landscape	Saint Lucia	2,561
3.	LCA-6	Pointe Sable	Saint Lucia	2,050
<b>Total</b>				<b>12,497</b>



## 14 Annex 7- Country Context- Saint Vincent and the Grenadines

### 14.1 Key Legislation and National Policy Context

The national policy context for Saint Vincent and the Grenadines is provided by the Constitution (1979), which establishes the right of protection from deprivation of property and provides for compulsory acquisition of property for public purposes. A key piece of legislation is the National Parks Act (2002), which provides for establishment of and regulation of activities within national parks, and provides for compulsory acquisition of land for establishment of national parks.

### 14.2 Potential PAPs

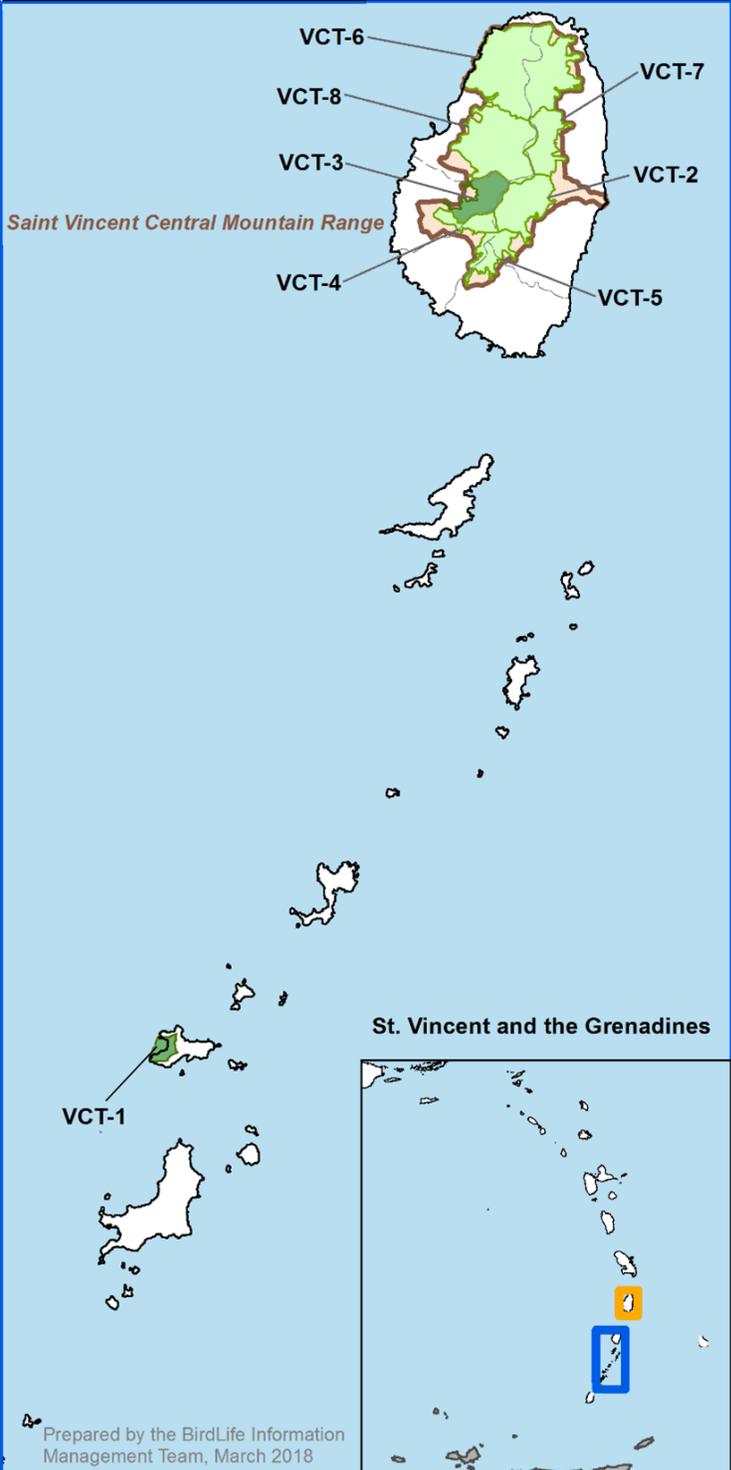
Potential PAPs comprise people who use land and/or natural resources within priority sites. There are two priority sites in Saint Vincent and the Grenadines. Cumberland Forest Reserve is legally designated as a protected area. The priority site is located on the island of Saint Vincent which has a population of more than 100,000 people. It is located in the mountainous interior of the island, which is sparsely populated relative to the coast. There are several farming communities in the valleys bordering the reserve but their activities are not believed to adversely impact the forest. Although it is illegal, unsustainable and destructive, poaching of mammals and birds has been observed at the site. Sub-projects may address this threat to biodiversity by reinforcing and/or incentivizing compliance with existing regulations. Potential PAPs include persons involved in poaching. Chatham Bay, Union Island is unprotected. The priority site is located on Union island, which has a population of around 3,000 people. It is on the western side of the island, and is uninhabited apart from a few, small tourist resorts. The main economic activity on the island is tourism. Some people are involved in fishing, although not necessarily as a full-time activity. Because project activities at Chatham Bay will focus on the terrestrial ecosystems that support an endemic species of gecko, fishing activities are not expected to be affected. Given the low level of human use of natural resources at the site, there are expected to be few or no potential PAPs. Nevertheless, in common with other islands where tourism is the mainstay of the local economy, the impact of COVID-19 on levels of dependence on natural resources will need to be assessed.

### 14.3 Figures and Maps of KBAs

	<b>Code</b>	<b>Site</b>	<b>Country</b>	<b>Land Area (ha)</b>
1.	VCT-1	Chatham Bay, Union Island	Saint Vincent and the Grenadines	350
2.	VCT-3	Cumberland Forest Reserve	Saint Vincent and the Grenadines	1,017
<b>Total</b>				<b>1,367</b>

### CEPF corridors and priority KBAs in Saint Lucia, and St. Vincent and the Grenadines

- Priority KBAs
- KBAs



Prepared by the BirdLife Information Management Team, March 2018