



Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 20-Mar-2018 | Report No: PIDISDSA24246



BASIC INFORMATION

A. Basic Project Data

Country Dominica	Project ID P166537	Project Name Housing Recovery Project	Parent Project ID (if any)
Region LATIN AMERICA AND CARIBBEAN	Estimated Appraisal Date 20-Mar-2018	Estimated Board Date 13-Apr-2018	Practice Area (Lead) Social, Urban, Rural and Resilience Global Practice
Financing Instrument Investment Project Financing	Borrower(s) Ministry of Finance	Implementing Agency Ministry of Housing, Lands and Water Resource Management	

Proposed Development Objective(s)

The Project Development Objectives (PDOs) are to contribute both to the recovery of housing for households affected by Hurricane Maria and to improve the application of resilient building practices in the housing sector

Components

- Support for Housing Recovery Systems and Capacity Building
- Support for Reconstruction of Houses
- Project Management and Coordination

The processing of this project is applying the policy requirements exceptions for situations of urgent need of assistance or capacity constraints that are outlined in OP 10.00, paragraph 12.

Yes

Financing (in USD Million)

SUMMARY

Total Project Cost	40.00
Total Financing	40.00
Financing Gap	0.00

DETAILS



Total World Bank Group Financing	40.00
World Bank Lending	40.00

Environmental Assessment Category

B - Partial Assessment

Decision

Other Decision (as needed)

B. Introduction and Context

Country Context

The Commonwealth of Dominica is a small upper-middle-income country in the Caribbean Sea, with a population of 73543¹. With a gross domestic product (GDP) of US\$525.42 million (2016),² Dominica’s economy depends predominantly on agriculture and tourism. Poverty remains a pervasive development issue, with a poverty headcount of 28.8 percent at the time of the last Country Poverty Assessment (CPA) conducted in 2009.³ Dominica is affected by fiscal sustainability challenges, with public debt levels as high as over 82.7 percent of GDP⁴, as a result of the country’s exposure to natural disasters and external shocks.

Dominica is particularly vulnerable to natural disasters from meteorological and geophysical events. Due to its location within the Atlantic hurricane belt, high-intensity weather events such as high wind, excess rainfall and hurricanes, continue to have adverse effects on vulnerable populations and the productive sectors of the country’s economy. Moreover, the island’s mountainous, rugged landscape creates significant engineering challenges to reducing infrastructure vulnerability to natural disasters and climate change.

Recurrent meteorological events have significantly affected the country’s economic and fiscal stability as well as the population’s socioeconomic wellbeing. Average annual losses from weather-related events between 1996 and 2015 are estimated at 7.9 percent of GDP, making Dominica the second most affected country globally in terms of average GDP loss during this time period. Tropical Storm Erika (2015) severely damaged the country’s

¹ World Bank Group Estimates: <https://data.worldbank.org/country/Dominica>

² Dominica | Drupal. <https://www.gfdrr.org/dominica>.

³ Kairi Consultants Ltd. *Country Poverty Assessment: Dominica*. 2010, <http://www.caribank.org/uploads/publications-reports/economics-statistics/country-poverty-assessment-reports/Dominica+CPA+-+Main+Report+Final+%28Submitted%29.pdf>.

⁴ IMF World Economic Outlook and World Bank staff calculations. Public sector debt includes estimated commitments under the Petrocaribe arrangement with Venezuela.



transportation, housing and agriculture sectors, with losses of about 90 percent of Dominica's GDP.⁵ Fiscal losses arising from these events and the ongoing challenges of climate change, threaten to set back hard-earned development gains and restrain economic growth. As a result, the Government of Dominica has made disaster risk management and climate change adaptation, its utmost priorities.

Sectoral and Institutional Context

The quality, quantity and adequacy of housing to meet demand remains a challenge, compounded by a complex topography and scattered small settlements. The pre-Maria demand for new and replacement housing, for all income groups, is estimated to average 400 units a year, of which less than 35 percent is met. Issues including land availability, integrated planning, institutional capacities, construction costs and access to finance all contribute to this gap. Main structural housing typologies include combinations of walls in different materials, among them wooden, concrete blocks and a combination of both. Wood and galvanized sheeting are most common for roofing. There is no evidence of confined masonry and poor connection walls-to-roof is a practice requiring revision.

The Government has been actively involved in supporting housing development over the years. The 'Housing Revolution' was initiated around 2006 and by 2014 had provided EC\$53 million (US\$19 million) in grants to various initiatives. Program interventions have included the Squatter Regularization Program, a special mortgage facility administered by the Government Housing Loans Board and the Agricultural Industrial and Development bank, the Housing Renovation and Sanitation Program, and the construction of low-income housing. However, housing recovery needs from Hurricane Maria go well beyond the scope of these programs and the capacity of the agencies. The Project has been designed to be a broader platform that the Government could expand and build on with external or national resources.

The GoCD will lead the overall housing recovery effort nationally, guided by a housing reconstruction strategy that aims to coordinate efforts in the sector and standardize approaches to recovery. This strategy will be implemented by the Ministry of Housing, Lands and Water Resource Management (MoH) in conjunction with the National Housing Task Force. The building damage assessment (BDA) indicates that out of the estimated 24,300 houses surveyed approximately 13,500 need minor to moderate repairs. On the other hand, about 10,800 require complete reconstruction or rebuilding of the entire roof structure. MOH's plan is to coordinate repair and reconstruction activities at the district and community level. This approach will be supported by Technical Assistance Centers (TAC), which will operate under the Ministry of Planning. The Government has allocated funding for housing repairs and is receiving support from NGOs and bi-lateral agencies. The Government also aspires to carry out major reconstruction projects, including the construction of 1,000 housing units in new sites.

The Housing Recovery Project looks to improve the resilience of the housing stock, encourage resilient building practices, and provide support to vulnerable households. The project seeks to build a platform that could be used for reconstruction or replacement of damaged homes throughout the country regardless of the source of funding. Specifically, it seeks to address deficiencies in planning processes and impediments to the

⁵ Dominica | Drupal. <https://www.gfdrr.org/dominica>.



uptake of resilient building practices in the country. Much of the housing in Dominica does not meet Building Code requirements. Previous initiatives by the Government to support the sector were focused on limited housing construction and not on ensuring uptake of resilient building practices, enforcing building standards and influencing construction practices in the country. The project looks to improve planning procedures and approvals and make resilient construction approaches accessible to the wider population through TACs. By focusing on the setup of the overall delivery mechanism, the project ensures that all activities are scalable so that other donors could easily adopt or contribute to the program. The World Bank is helping the Government to explore funding to fill financing gaps.

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

The Project Development Objectives are to contribute both to the recovery of housing for disaster-affected households and to improving the application of resilient building practices in the housing sector

Key Results

- Direct Project Beneficiaries.
- Number of households with resilient housing recovered using Project subsidies,
- Number of households that accessed general advice service from TAC and benefit from streamlined permitting process

D. Project Description

Component 1: Support for Housing Recovery Systems and Capacity Building (US\$3.5 million)

This component would set up systems to manage, expedite, and monitor the housing recovery program and would build capacity and a sustainable framework for development planning in the housing sector, through three sub-components.

Sub-component 1.1: Development Planning Support to Technical Assistance Centers and the Project at the Local Level (US\$2.7 million). Technical Assistance Centers (TAC) are being set up in several districts by the Ministry of Planning to support the overall housing recovery program and extend the functions and responsiveness of the Physical Planning Division (PPD). The project will extend the TAC's role by supporting additional technical staff in the TAC who would provide free technical advisory services to homeowners on demand, facilitate processing of planning and building controls, conduct building assessments and facilitate technical training on the application of resilient building practices. The purposes of the TACs are to guide and encourage resilient practices in construction and to strengthen planning control capacity at a local level. The project will provide support to expand the staffing and the number of centers and sustain operation through the project implementation period.



Subcomponent 1.2: Development of management Information systems, to support planning and monitoring processes in Project agencies (US\$0.6 million). Management information and monitoring systems, including a registry database, will be developed under the project to support the housing recovery program and the physical planning process. The systems will provide support to the Ministry of Housing and Ministry of Planning, and will be implemented in conjunction with the ICT unit for ongoing technical support and operation.

Subcomponent 1.3: Technical design of a new Physical Development Planning Office (US\$ 0.2 million). As the PPD building was destroyed by the hurricane, the project will fund the detailed design of the building, incorporating resilience to multiple hazards, in preparation for construction under other sources of funding.

Component 2: Support for Reconstruction of Houses (US\$33.5 million).

This component will provide subsidies in the form of small grants for owner-driven reconstruction or replacement of houses that were classified as “destroyed”. Eligible homeowners would use the grant, and their own resources, *if necessary*, to undertake the rebuilding works to a design of their choice, as follows.

Sub-component 2.1: Support for Reconstruction of Houses (\$31.45 million). This sub-component will provide around 1,700 eligible homeowners with a grant subsidy up to US\$18,500 (EC\$50,000). The typical works are complete rebuilding in place, substantial rebuilding to complete reconstruction, or replacement of the building. Eligible homeowners will select the scope and approach to reconstruction and fund the whole process, with the support of the fixed grant. The grant will be conditional on the construction having a valid building permit, certified PPD inspections and a completion certificate verifying that the building complies with the applicable Building Code and Guidelines. The grant would be disbursed to the homeowner’s banking institution in tranches, aligned with major stages of completion, for on-payment to the contractor.

Sub-Component 2.2: Design and supervision of house reconstruction (US\$2.05 million). Design and supervision services for the reconstruction works for eligible beneficiaries under Sub-component 2.1 will be provided. These services include customized design, scope of works and cost estimates in compliance with the building guidelines for resilience to Category 5 storm events, technical supervision of site and building works in compliance with applicable environmental and social safeguards, ensuring compliance certifications at various stages of work and provision of certification of completion.

Component 3: Project Management and Coordination (US\$3 million)

This component will finance the establishment and operation of the Project Implementation Unit under the Ministry of Housing and the Implementation Support Team (IST) through, inter alia: (i) the costs of Project Managers and specialists in financial management, procurement, environmental and social safeguards, communications, and monitoring and evaluation and other areas as may be required for implementation, (ii) the hiring of other technical experts needed for project preparation and implementation, (iii) preparation of environmental and social safeguards studies and instruments including development of communication strategy and grievance redress mechanism, (iv) carrying out the fiduciary aspects of the Project including audits, (v) the provision of training and workshops, (vi) the financing of the necessary goods, equipment, and operating costs, and (vii) implementation of safeguards instruments.



E. Implementation

Institutional and Implementation Arrangements

The Government has overall responsibility for the implementation of this multi-ministerial project. At the highest level, an HTF will provide strategic oversight and ensure policy coordination. It is chaired by the Cabinet Secretary and includes members from the MoH, MoP, Lands and Surveys Division, and the Office of the Prime Minister. An IST housed within the Ministry of Finance (MoF) will provide close implementation support to all the PIUs of all World Bank-funded projects, as a shared service, in the areas of procurement, safeguards, and fiduciary aspects. It will be staffed with two international procurement specialists, a financial management manager, safeguards specialists, and a portfolio manager.

A PIU based in MoH will be responsible for the coordination and implementation of the program, and will work closely with MoP. The PIU will be responsible for procurement, contract management, financial management, safeguards, technical coordination and other activities, that will be outlined in the Project Operations Manual. A grievance redress system will be developed and implemented by the PCU.

On March 9, 2018 the Government established the Climate Resilience Execution Agency of Dominica (CREAD) that will help rebuild Dominica as the first climate resilient nation. The mission of the agency is to coordinate all reconstruction work to avoid duplication, maximize economies of scale, spot and fill critical gaps and ensure all reconstruction activities are focused on a single Climate Resilient Recovery Plan developed by Dominica and its partners. The current implementation arrangements using PIUs and the IST for all three World Bank post-Hurricane Maria projects have been designed to be flexible and in harmony with the objectives of CREAD, while mobilizing a combination of national and international staff to advance implementation while the CREAD recruitment and operationalization is being finalized. The IST support will be cost shared across the World Bank portfolio of investment projects and will work closely with CREAD on the coordination of reconstruction efforts.

Technical Assistance Centers (TACs) in MoP will serve as a decentralized extension of the Physical Planning Department dispersed geographically across districts to improve community outreach and provision of technical advice, guide construction practices and strengthen development control capacity. The technical advisory section of the TAC will be staffed with technical professionals (engineers/architects) funded by the Project, and the Development Control section will be staffed with a Development Control Officer (DCO) from Physical Planning Division and building inspectors funded by the Project. The PCU and the TACs will monitor, verify and validate processes for beneficiary selection where applicable and in oversight of work at a community level.

The MOH will manage the housing subsidy and reconstruction process. Support and implementation for rebuilding homes will follow an owner-driven approach. The Project will include clear beneficiary selection criteria to manage the high demand for housing support

F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

Dominica is a mountainous island with rugged landscape that creates significant engineering challenges to reducing infrastructure vulnerability to natural disasters and climate change. Dominica has a population of approximately 72,000 people and a land area of approximately 750 km². About 60% of the land is classified



as a World Heritage site by UNESCO, due to its rich biodiversity. It is located near the center of a string of islands known as the Lesser Antilles, between the neighboring French territories of Martinique and Guadeloupe. The capital Roseau is located to the south-west of the island and has a population of around 15,000 people. The project will seek to replace or reconstruct damaged houses throughout the country. Dominica’s human settlements and physical development are concentrated along narrow coastal areas (particularly in the south and west), with almost 62% of the island’s population living along the coast. The housing constructed under this Project will be done in accordance with requirements of the Building Guidelines for resilience to Category 5 storm events

G. Environmental and Social Safeguards Specialists on the Team

Gibwa A. Kajubi, Social Safeguards Specialist

Ximena Rosio Herbas Ramirez, Environmental Safeguards Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>The project is rated environmental Category “B” as it involves the reconstruction or replacement of houses that were classified as “destroyed”. The civil works will be small scale, site-specific, temporary, reversible, limited to the reconstruction or replacement timeframe and will take place in different locations of Dominica. Negative impacts can be mitigated through the application of good construction and management practices, with close supervision from the works contractor(s) and supervision consultant. Moderate to minor environmental risks relate to local extraction of construction material (sand, gravel, clay) that may increase vulnerability to landslides and soil erosion. Small scale construction works have minor risks related to health & safety.</p> <p>Accordingly, an Environmental and Social Management Framework (ESMF) will be prepared to guide the identification of possible social and environmental issues; develop mechanisms to comply with relevant GoCD and World Bank’s policy requirements; lay out the approach and procedures</p>



relevant during the planning and implementation to mitigate the potential environmental and social impacts of the proposed investments; and describe the institutional and implementation arrangements, the monitoring mechanisms, and the capacity building needs for effective implementation of the ESMF. The ESMF will be prepared within two months from project effectiveness (see Environment and Social Safeguards Action Plan)

For the set of project activities (not civil works), involving technical assistance such as assistance to the TACs (Technical Assistance Centers) to support development planning and the Project at local level; development of management Information systems, including a registry database, support planning and monitoring processes in Project agencies and the technical design of a new Physical Development Planning Office, and that activities themselves do not have direct adverse environmental or social impacts, the ESMF will indicate that TORs for the studies, and the planning of the activities will take into account relevant environmental and social issues in order to conduct the studies/activities in a manner that reflects the principles of Bank safeguards.

The project focus is on targeting the neediest households based on poverty and vulnerability. Eligibility criteria and prioritization attributes have been clearly defined in the Project documentation. To be considered an eligible household, the following criteria must be met: (i) be within the boundaries of established house size; (ii) house must be primary residence of the occupant in the home at the time of the disaster; (iii) house must have been fully destroyed; (iv) house must be in a low hazard risk area, as assessed by the TAC; (v) house must be uninsured; (vi) homeowner must not have received other reconstruction or structural restoration support through another donor or program.

Following the application of the eligibility criteria described above, potential beneficiaries will be prioritized on the basis of ranking to ensure categorical targeting of the neediest households



based on poverty and vulnerability. This prioritization will ensure targeting of the most vulnerable, given the current limitations in resources, should there be oversubscription of potentially eligible households. The criteria for prioritization include a sequence of filters based on socio-economic and demographic criteria, including households still in shelters; Public Assistance beneficiary households; and heads of households that are single parent with children, disabled, or elderly. This categorical and demographic information would be based on data from, among others, Ministry of Social Services public assistance beneficiary database; shelter occupant information; community associations; and the Vulnerability Needs Assessment (VNA). These criteria have been informed through focus group consultations with affected households and in discussions with the Government.

Lastly, an independent verification of the beneficiary list will be undertaken by local committees, comprised of religious groups, NGOs or civil society entity to identify any inaccuracies or discrepancies, and serve as an interface between the beneficiaries and the Government. The beneficiary list would be made publicly available to the community as a final point of confirmation and validation

Natural Habitats OP/BP 4.04	No	Given the project’s focus on rehabilitating/rebuilding existing houses, in the same locations, no impacts on natural habitats are expected and no significant conversion or degradation of critical natural habitats or forests will occur.
Forests OP/BP 4.36	No	Given the project’s focus on rehabilitating/rebuilding existing houses, in the same locations, no impacts on the health and quality of forests are expected ;
Pest Management OP 4.09	Yes	This policy is triggered as pesticides may be required for pest control (termites) in the rehabilitated or newly constructed houses
Physical Cultural Resources OP/BP 4.11	Yes	No significant impacts are expected on physical cultural resources, nevertheless the Project will include provisions to include a “chance find” procedure in all works contracts. The



		ESMF will incorporate appropriate procedures for this.
Indigenous Peoples OP/BP 4.10	Yes	This policy will be triggered as there are communities that meet the World Bank criteria for the Indigenous Peoples Policy. The Education and Information Campaign and Stakeholder Engagement Plan will be informed by a rapid social assessment to include specific consultations with the Kalinago Communities to ensure they are informed about the project and its potential impacts and how they can participate as it is demand driven. Initial consultations were held with this community in February 2018 for the Government to learn about the impact of the Hurricane on their housing needs. The Indigenous Peoples Plan will be prepared within two months from Project effectiveness (see Environment and Social Safeguards Action Plan)
Involuntary Resettlement OP/BP 4.12	Yes	The policy is being triggered to address instances of economic displacement. However project investments could have unintended impacts that result in economic displacement (e.g. if new core house is to be built on different footprint on same site which could affect crops or another asset). These situations are expected to be few and the will include a screening checklist in the ESMF to ensure that no physical displacement occurs and to avoid economic displacement and/or compensate should it become necessary. ARAPs will be prepared in the case of the latter, and will be prepared prior to the start of any civil works.
Safety of Dams OP/BP 4.37	No	This policy should not be triggered given that the project will not support the construction or rehabilitation of dams nor will support other investments which rely on the services of existing dams.
Projects on International Waterways OP/BP 7.50	No	This policy should not be triggered because the project will not affect international waterways as defined under the policy.
Projects in Disputed Areas OP/BP 7.60	No	This policy should not be triggered because the proposed project will not affect disputed areas as defined under the policy.



KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

Environmental impacts of the project are related to Component 2 (Support for Reconstruction of Houses). The civil works will be small scale, site-specific, temporary, reversible, limited to the reconstruction or replacement timeframe and will take place in different locations of Dominica. Negative impacts can be mitigated through the application of good construction and management practices, with close supervision from the works contractor(s) and supervision consultant. Moderate to minor environmental risks relate to local extraction of construction material (sand, gravel, clay) that may increase vulnerability to landslides and soil erosion. Small scale construction works have minor risks related to health & safety.

Given the project's focus on reconstructing and rehabilitating houses and reconstructing houses in their original locations, no impacts on natural habitats are expected and no significant conversion or degradation of critical natural habitats or forests will occur. Also, no significant impacts are expected on physical cultural resources, nevertheless the Project will include provisions to include a "chance find" procedure in all works contracts.

Involuntary Resettlement (OP 4.12) is being triggered to address instances of economic displacement. Project investments could have unintended impacts that result in temporary involuntary resettlement (for example, should a new core house be sited in a different location on the same site for safety reasons and/or economic displacement or if a new core house is to be built on different footprint on the same site, which could affect crops or another asset). ARAPs will be prepared in the case of the latter. While these situations are expected to be very few, if at all, the Environmental Social Management framework (ESMF) will include a screening checklist to ensure that no physical displacement occurs and avoid economic displacement and/or compensate should it become necessary. The draft ESMF will be prepared within 2 months of project effectiveness. (See Environment and Social Safeguards Action Plan)

The project will : (i) avoid household displacement following the reconstruction of housing where informal lease arrangements were in place; and (ii) ensure that owners have a say in the reconstruction process, in cases where owners were not the house occupant. Unsafe site conditions will be mitigated. If this is not feasible, the household will be directed to alternative government programs for assistance. Houses that are to be built will be resistant to Category 5 events and will meet the minimum standards set by the Ministry of Physical Planning.

The Project focuses on in-situ reconstruction of completely destroyed homes and is not financing any repairs of major damages which would necessitate temporary relocation of households during construction period. Other development partners are focusing on repair works and Government programs are focusing on reconstruction that require resettlement. Regarding permanent displacement, the Government has established an inter-ministerial resettlement committee and have relocated households after Tropical Storm Erika in 2015 and wishes to expand and continue the program. Post Hurricane Maria, the Government has a plan to relocate up to 1000 households and has already identified areas for this. The gap in terms of support for full reconstruction is for in-situ reconstruction/replacement of completely destroyed houses, for households that do not need to be relocated, which is where the project focus lies. The Bank financed Emergency Housing Project will provide technical advice to the Ministry of Planning and the Resettlement Committees on good practice approaches for housing recovery for consideration for this separate Government-led process.



Guidance will be provided in the Environmental and Social Management Framework (ESMF) for the screening checklist which will be made available by the PIU to the Officers in the TAC centers to ensure that no resettlement occurs.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:
None

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.
No meaningful alternative consideration is anticipated through the current project approach as the houses will be reconstructed or rebuilt in the same locations taking into consideration sound environmental practices and avoidance of landslide land prone areas.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.
The project is prepared according to Paragraph 12 of the World Bank Operational Policy 10.0, Preparation of Investment Project Financing—Situations of Urgent Need of Assistance or Capacity Constraints. Under an emergency situation, in accordance with the policy, preparation of detailed safeguard instrument is deferred to the early stage of implementation, and a Safeguards Action Plan addressing the application of environmental and social policies has been prepared. The Safeguards Action Plan ensures a legally binding roadmap for safeguards compliance during project implementation and provides clear guidance to the Borrower on the types of actions and instruments required so as to facilitate speedy implementation of emergency services. It also includes a timetable setting forth all the steps and the sequential planning required to prepare the safeguards instruments to ensure compliance with the safeguards requirements. The Safeguard Action Plan can be found in Annex 5 of the PAD.

In accordance with the Safeguard Action Plan, the GoCD will prepare an Environmental and Social Management Framework (ESMF) to guide the identification of possible social and environmental issues. The ESMF will: (i) outline mechanisms to comply with relevant GoCD and World Bank's policy requirements; (ii) lay out the approach and procedures relevant during subproject planning and implementation to mitigate the potential environmental and social impacts of the proposed investments; (iii) incorporate enhancement measures where relevant and feasible; (iv) describe the institutional and implementation arrangements and monitoring mechanisms; and (v) determine the capacity building needs for effective implementation of the ESMF. The ESMF will be prepared within two 2 months from Project effectiveness. (See Environment and Social Safeguards Action Plan.)

The capacity to prepare, implement and supervise the environmental and social instruments in Dominica is limited, with this limitation factored into implementation arrangement design. The Institutional Support Team (IST) housed in the Ministry of Finance (MoF), will be staffed with international, knowledgeable environmental and social safeguards specialist that will support the PCUs of the World Bank Funded Projects. The Project Coordination Unit (PCU) under the Ministry of Housing will be staffed with an environmental and a social safeguards specialist. Technical Assistance Centers (TACs), dispersed geographically across districts, will provide technical advice and guide construction practices and strengthen development control capacity. Roles and responsibilities will be fully specified under the ESMF as well as capacity building needs.

Feedback and Grievance Redress Mechanism. A significant risk to the project is not targeting the potential beneficiaries resulting in social tension and complaints. The project will establish a GRM to receive complaints and grievances related to project activities and provide the public with an avenue to provide feedback on the



reconstruction and rehabilitation activities supported by the project. The GRM will include clear mechanisms for receiving and recording complaints and grievances, as well as general feedback from the public. The GRM could also receive complaints through the TACs, as they are easily accessible to the community. The preparation of the GRM will draw on existing GRMs being implemented in Dominica. The project will be guided by a Social Development Specialist whose role will be to ensure that the principles and procedures followed by the project's GRM's are consistent with other projects. The process will be reviewed to make it consistent with other Bank financed projects to ensure a common approach to intake, recording, feedback routes and resolution timelines.

The government is instituting a shared Implementation Support Unit in the Ministry of Finance with fiduciary specialists for procurement, financial management, safeguards, and Monitoring and Evaluation. The main role of the social safeguards specialist in the IST will be to work closely with the Ministry of Agriculture, Ministry of Housing and Ministry of Environment to ensure the principles and procedures followed by the GRM are consistent across all projects and that there is a coordinated approach to the preparation and implementation of a robust Communication Campaign. The work of the GRM will be supported by an electronic monitoring database to record complaints and grievances and report on their resolution

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

The main stakeholders will include: (a) 1,700 Beneficiaries in low income households receiving subsidy for home repair grants; (b) About 12,000 household recipients of technical services package for resilient rebuilding of houses; (c) Banking entities where beneficiary accounts will be set up; (d) Government agencies providing policy oversight and coordination -- Ministry of Finance, Ministry of Housing, Lands and Water Resource Management (MoH), National Housing Task Force, Technical Assistance Centers (TAC) under the Ministry of Planning and the PCU; (e) NGOs active in reconstruction; (f) Builders and Crafts groups that will benefit from training; and (g) other Donors providing support for immediate housing needs as a first phase of housing recovery.

The mechanism for consultation and disclosure on safeguards include the following:

Op 4.12. An ESMF will be prepared including a screening methodology with a negative list excluding involuntary resettlement, a template for preparing site specific ARAPs (through RAPs may required), and a template for preparing site specific Environmental and Social Management Plans (ESMPs). The ESMF will be prepared within 2 months from Project effectiveness and any ESMPs will be prepared prior to the commencement of works;

OP 4.10 Indigenous Peoples. The project, through its Information and Communication Campaign, will develop a Stakeholder Engagement Plan to include specific consultations with the Kalinago community to ensure that they are informed about the project and its potential impacts and how they can participate as it is demand driven. Positive effects include benefits to beneficiaries in the form of a housing subsidy and technical advice and design services. Negative effects include low levels of consultation and communication for project activities and ineffective mechanisms for benefit targeting and information dissemination leading to exclusion of indigenous groups from project benefits. Initial consultations were held with this community in February 2018, for the Government to learn about the impact of Hurricane Maria on their housing needs. Based on consultation feedback undertaken with the Kalinago community during preparation, the Project design will ensure that indigenous council leadership are involved in policy and decision-making discussions and beneficiary selection processes to avoid lack of representation. The project design is flexible to accommodate their preferences for homes in their territory (preference for use of a mix of lumber and concrete) while observing the building codes. Additional consultations will be coordinated for all Bank



financed projects. An Indigenous Peoples Plan (IPP) will be prepared within two months from Project effectiveness.

The ICC will reach potential beneficiaries and the wider public to ensure awareness of (i) available support packages under the Project, including services available technical assistance centers; (ii) application, eligibility determination and enrollment processes; (iii) complaints and grievance system; (iv) beneficiary responsibilities; and (v) housing reconstruction standards and best practices targeted to the general public.

Safeguards must be prepared by the Government, cleared by the Bank and disclosed as early as possible and before the start of civil works. Site specific safeguards instruments (ESMPs and ARAPs should there be a need for economic displacement) will be required for all investments financed under the project, including those financed under retroactive financing prior to the start of any construction.

B. Disclosure Requirements

The review of this Safeguards has been Deferred.

Comments

This project is being processed under OP/BP 10.00, paragraph 12, therefore the implementation of safeguards is deferred

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C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?

No

OP 4.09 - Pest Management

Does the EA adequately address the pest management issues?

Yes

Is a separate PMP required?

NA

If yes, has the PMP been reviewed and approved by a safeguards specialist or PM? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?

NA

OP/BP 4.11 - Physical Cultural Resources

Does the EA include adequate measures related to cultural property?

NA

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?

NA

OP/BP 4.10 - Indigenous Peoples

Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?

No

OP/BP 4.12 - Involuntary Resettlement

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?

No

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

No

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

No



Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

No

All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

Yes

Have costs related to safeguard policy measures been included in the project cost?

Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

Yes

CONTACT POINT

World Bank

Yohannes Yemane Kesete
Disaster Risk Management Specialist

Nicholas James Callender
Disaster Risk Management Analyst

Borrower/Client/Recipient

Ministry of Finance

Implementing Agencies

Ministry of Housing, Lands and Water Resource Management
Lucien Blackmoore
Permanent Secretary
blackmoorel@dominica.gov.dm



FOR MORE INFORMATION CONTACT

The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: <http://www.worldbank.org/projects>

APPROVAL

Task Team Leader(s):	Yohannes Yemane Kesete Nicholas James Callender
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Approved By

Safeguards Advisor:	Noreen Beg	15-Mar-2018
Practice Manager/Manager:	Ming Zhang	15-Mar-2018
Country Director:	Sabine Hader	20-Mar-2018