

Dominica Geothermal Development Company
Government of Commonwealth of Dominica

Dominica Geothermal Risk Mitigation II Project Construction of Transmission Lines and Substations



Stakeholder Engagement Plan (SEP)

Draft November 2023

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List of Acronyms

ARAP	Abbreviated Resettlement Action Plan
CLO	Community Liaison Officer
CoI	Corridor of Influence
CSO	Civil Society Organization
DGDC	Dominica Geothermal Development Company
DGRMP	Dominica Geothermal Risk Mitigation Project I
DGRMP II	Dominica Geothermal Risk Mitigation Project II
DOMLEC	Dominica Electricity Services Ltd.
ESIA	Environment and Social Impact Assessment
ESF	Environment and Social Framework
ESMP	Environment and Social Management Plan
ESS	Environment and Social Standard
FGD	Focus Group Discussion
FSI	Transmission line network from Fond Cole substation to Sugarloaf substation
GLI	Transmission line network from the geothermal power plant to Laudat substation
GFI	Transmission line network from the geothermal power plant to Fond Cole substation
GRM	Grievance Redress Mechanism
GTI	Transmission line network from the geothermal power plant to New Trafalgar substation
kV	kilovolt
LMP	Labor Management Procedures
NGO	Non-Government Organizations
O&M	Operation and Maintenance
PAI	Project Area of Influence
PAP	Project Affected Person
PFI	Transmission line network from Padu substation to Fond Cole substation
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
TA	Technical Assistance
TPI	Transmission line network from Trafalgar substation to Padu substation
WHO	World Health Organization

1. Introduction/Project Description

The Dominica Geothermal Risk Mitigation II Project (DGRMP II) aims to enable the development and integration of renewable geothermal energy capacity in Dominica. DGRMP II will support the construction of transmission line networks from Dominica's first domestic geothermal power plant, which will be built by the ongoing DGRMP (first phase). The geothermal power plant is located in the Laudat community in Roseau Valley, south of the island. Both DGRMP and DGRMP II are implemented by the Dominica Geothermal Development Company Ltd. (DGDC), a private company in which the Government currently owns 100% of the shares.

The proposed DGRMP II comprises two components: (1) Transmission Network Development for Integration of the Geothermal Power Plant and (2) Technical Assistance (TA) and Project Implementation Support.

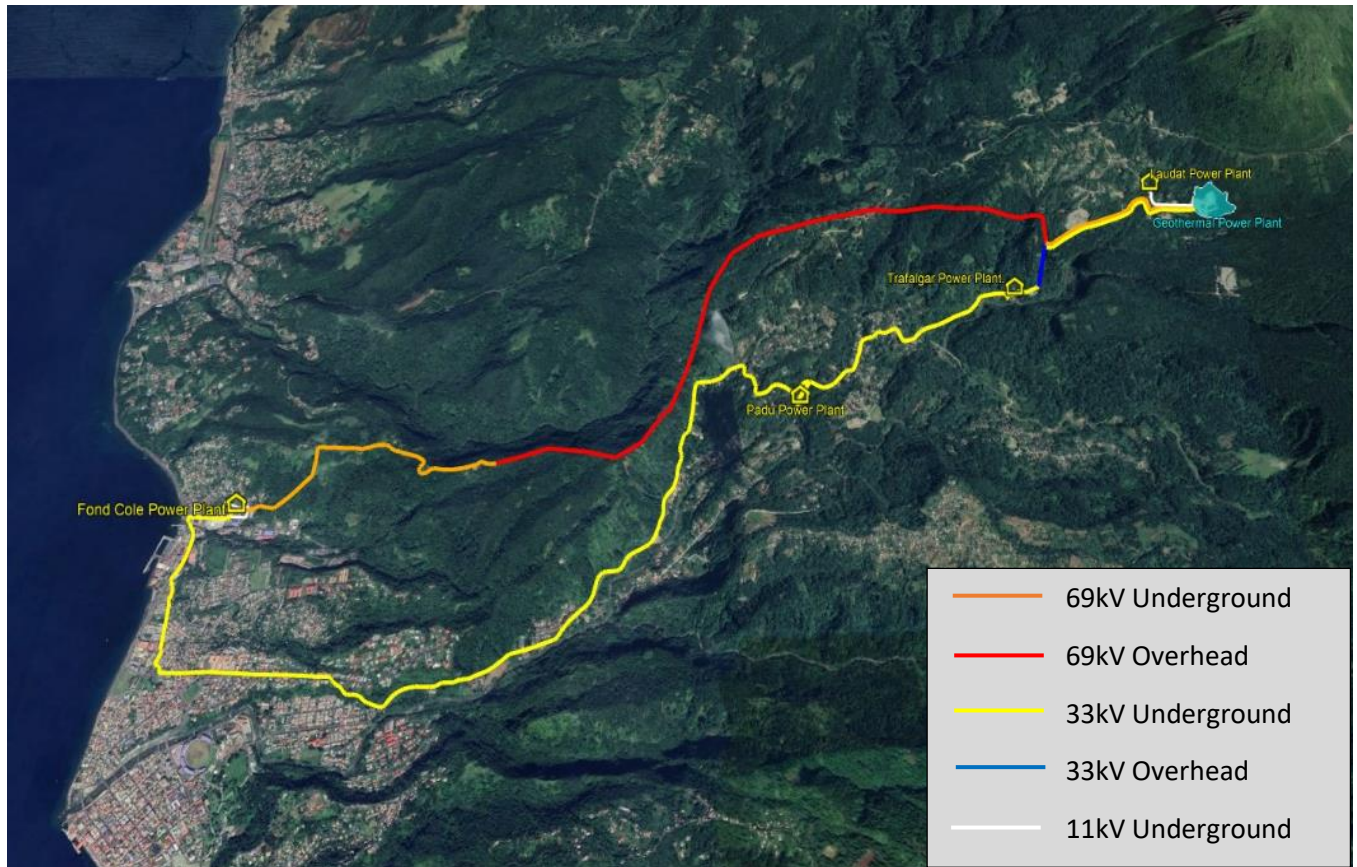
Component 1 will entail the construction of new transmission lines and three substations connecting the geothermal power plant with the national electric system load centers in Fond Cole (near Roseau City in the southwest). Network expansion will take place in four segments:

- (i) A 69 kilovolt (kV) transmission line of 7.5 km from the geothermal power plant to the Fond Cole substation (GFI) consists of underground and overhead installation. To reduce land acquisition and easement in the Glasgow community, a part of the GFI transmission line will be installed underground in a public road from the Fond Cole sub-station up to the Glasgow community. Thereafter, GFI will switch to an overhead installation with about 20 pole structure sites.
- (ii) A 33 kV underground transmission line, totaling 10 km that connects between the geothermal power plant and New Trafalgar substation (GTI), between Trafalgar and Padu substations (TPI), and between Padu and Fond Cole substations (PFI). TPI and PFI will be placed under the major road between Trafalgar and Roseau City.
- (iii) An 11 kV underground transmission line of 0.5 km connecting the geothermal power plant to Laudat substation (GLI).
- (iv) Two new 69/33/11 kV substations at the Geothermal plant and Fond Cole; a new 33/2.2 kV substation at New Trafalgar; and a new 33/11 kV substation at Padu.

Figure 1 provides the project location map with the transmission line network.

Component 2 will finance project management by DGDC and capacity building of Dominica Electricity Services Ltd. (DOMLEC) in operating new 33kV and 69kV networks.

Figure 1: Project Location Map.



Under GFI, the construction of overhead transmission lines will require small land acquisition for the footprint of pole structures. The land acquisition per footprint is estimated between 160 m² and 280 m², depending on the type of structure (single or three-pole structure. See Figures 2 and 3). The average pole height will be 20m. It is estimated that GFI will have about 20 pole structure sites.

Figure 2. Single pole structure with stays

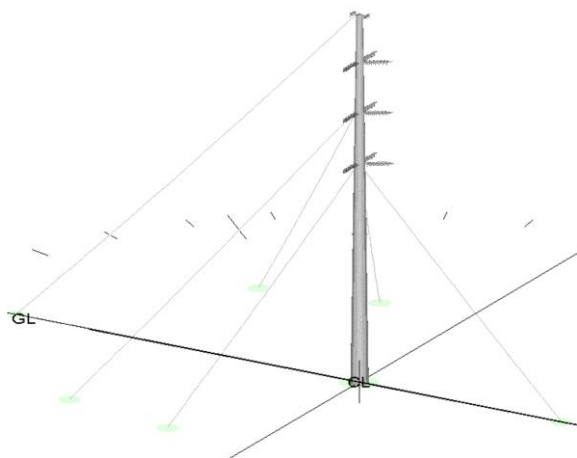
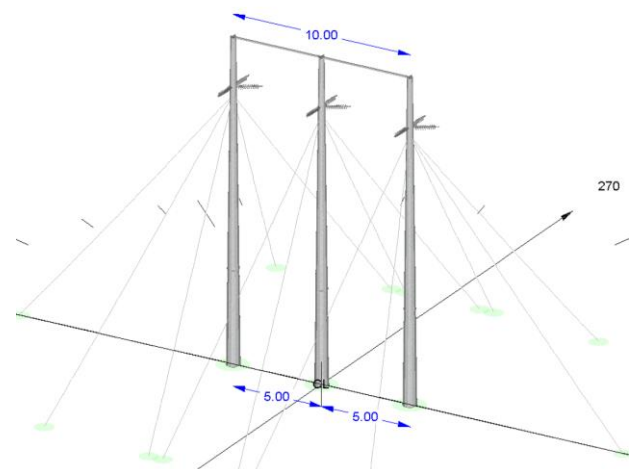
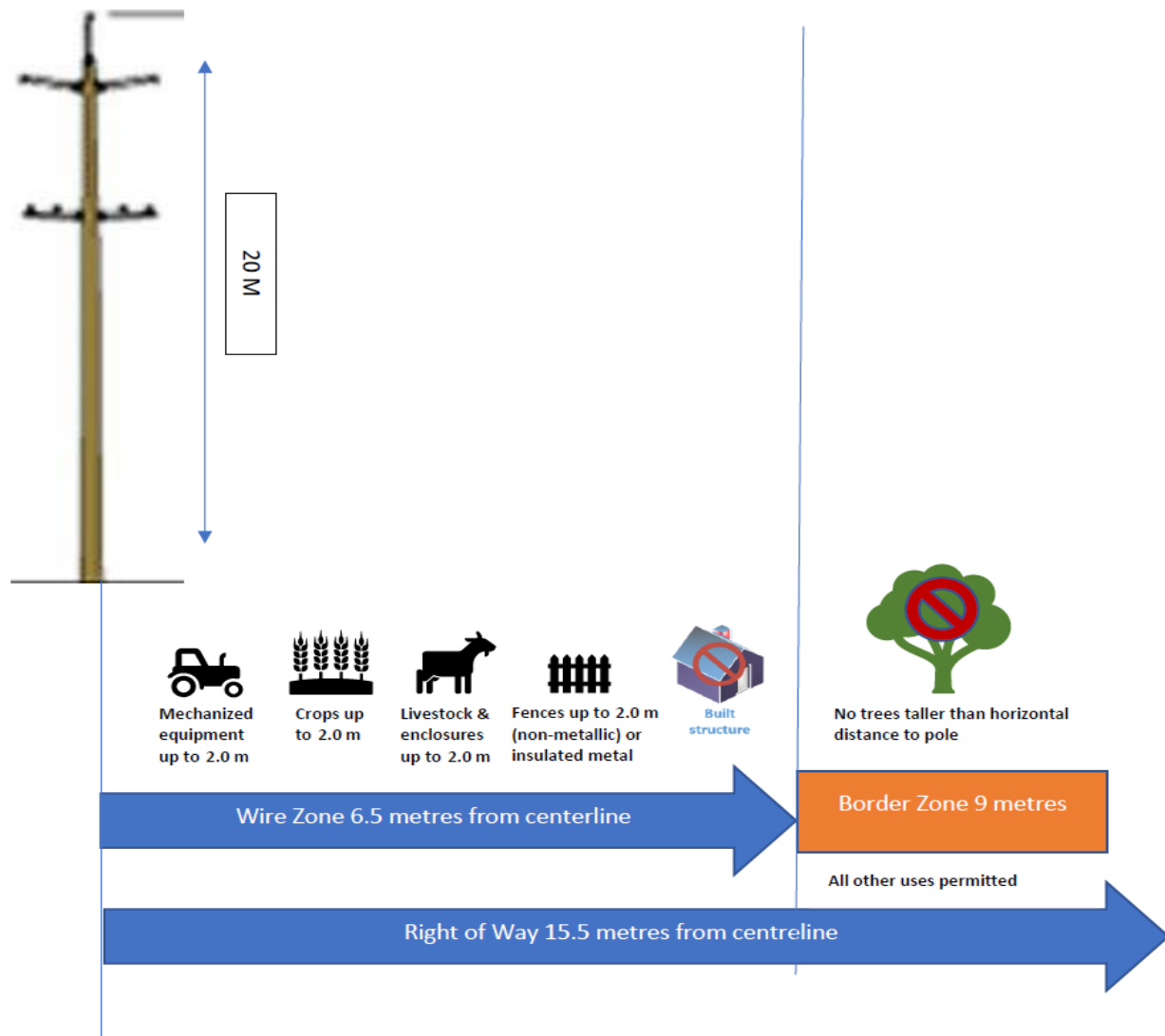


Figure 3. Three-pole structure with stays



Additionally, the project will introduce easement. There will be land use restrictions under overhead transmission lines and new access roads to pole structures. No buildings are permitted within the wire zone under the overhead transmission lines. At the pole sites in the **wire** zone, i.e. within a radius of 6.5m around each pole, no structure (e.g., livestock enclosures, fences), mechanized equipment and trees/crops taller than 2m are permitted. At the pole sites in the **border** zone, i.e., in a radius of between 6.5m and 9m around each pole, no tree or structure taller than 6m is permitted (see Figure 4). In addition, along the right-of-way, i.e., midspan between one pole site and another, no structure or tree is allowed within 18m below the conductors.

Figure 4. Right of Way Land Use Restriction



Majority of pole structure sites will require new access roads for civil work and operation/maintenance (O&M). The access roads will be earthen roads built with locally available *tarish* materials from volcanic gravels. The road width will be between 3 and 5m, and the length will vary from 20m to about a kilometer.

The affected land under overhead transmission lines and by the construction of new access roads will be under easement. Land acquisition/easement procedures, impacts, and compensations are detailed in the Abbreviated Resettlement Action Plan (ARAP).

Originally, DGRMP II was also to support the construction of 69kV transmission line network between Fond Cole and Sugarloaf substations on the West Coast. This is no longer the scope of this Project. It would be a subsequent investment.

The proposed DGRMP II is being prepared under the World Bank's Environment and Social Framework (ESF). Environmental and Social Standards (ESS) - ESS1, ESS2, ESS3, ESS4, ESS5, ESS6, and ESS10 are relevant to this project. ESS7 is not relevant, as the Project will not be implemented on the east coast, where Kalinago, the indigenous people in Dominica, reside. However, in case an area of cultural significance is identified during construction, the chance find procedures will be applied (detailed in ESIA). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

2. Objective/Description of SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

3. Stakeholder identification and analysis

3.1 Methodology

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach:* Public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- *Informed participation and feedback:* Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- *Inclusiveness and sensitivity:* Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.

- *Flexibility/technology use:* To ensure wider participation in public consultations, the methodology should adapt to other forms of engagement, such as use of technology (various forms of internet- or phone-based communication).

3.2. Affected parties and other interested parties

Affected Parties. Project affected parties are persons, groups, and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. For the proposed DGRMP II, affected parties include:

- PAPs, i.e., landowners, tenants, and squatters who will be affected by land acquisition/easement
- Construction workers (mostly local)
- Community members in Corridor of Impact (Col) who could be affected by civil work (damage to property, noise, dust, traffic, access to properties/schools, etc.)
- Road users, including commuters, taxi/minibus drivers, and truck drivers
- Tourism sector, including tour operators and hotels/lodges
- Roadside business owners, including shops and restaurants

Other Interested Parties. Other interested parties are individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. For the proposed project, other interested parties include:

- Community/town councils
- General public
- DGDC
- Dominica Electricity Services Ltd. (DOMLEC)
- Other government organizations, such as Department of Lands, Department of Forestry, Environmental Coordinating Unit (ECU), etc.
- NGOs/Civil Society Organizations (CSOs), including National Council of Women, Dominica Council on Aging, and Dominica Association of Persons with Disabilities

3.3. Disadvantaged/vulnerable individuals or groups

Disadvantaged/vulnerable individuals or groups are persons who may be disproportionately impacted or further disadvantaged by the project(s) compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Within the Project, vulnerable or disadvantaged groups may include but are not limited to the following:

- Landless (tenants and squatters) who are affected by land acquisition/easement,
- Female-headed households
- Disabled
- Elderly
- Migrants

4. Stakeholder Engagement Program

4.1. Summary of stakeholder engagement done during project preparation

Under the on-going DGRMP, DGDC has carried out a number of stakeholder engagement activities in Laudat, Trafalgar, and Wotten-Waven communities since 2012. The three communities are affected by drilling and construction of geothermal power plant and/or transportation of heavy machineries and equipment. The engagement activities include public consultations, consultations/interviews with community members, and focus group discussions (FDGs) with business owners (tourism lodges and operators). DGDC has been undertaking information outreach through community councils, school visits, media, and social media groups. The main questions/feedback have been on community health and safety, construction impacts, natural hazards, and employment opportunities.

In preparation for the proposed DGRMP II, DGDC initiated FDGs with 12 local councils in Corridor of Impact (Col) in Roseau Valley and West Coast¹ between May and August 2022 (i.e., Colihaut, Fond Cole, Salisbury, St. Joseph, Mahaut, Roseau, Laudat, Portsmouth, Trafalgar, Canefield, Coulibistrie, and Dublanc). 69 council members (30 men and 39 women) participated in FDGs. The council members were overall supportive of the proposed transmission line network, which was understood to be a part of the ongoing geothermal development. Key questions/feedback include the safety of higher voltage overhead lines, expected economic benefits of the geothermal project, and the planned delivery date of power from the geothermal plant.

In March 2023, DGDC conducted face-to-face public consultations in six communities in Col, i.e., Portsmouth, Mahaut, Colihaut, St. Joseph, Fond Cole, and Trafalgar. A total of 55 community members (32 men and 23 women) participated in the public consultations. Key questions/feedback raised include the safety of electromagnetic fields/radiation, project design, economic benefits, land acquisition/compensation, land use restrictions, and employment opportunities (see Table 1 for the summary of public consultations).

On July 10, 2023, DGDC disclosed draft ESIA, RAP, SEP, and LMP on its website. A national public consultation was held in Roseau on August 1, 2023, which was livestreamed on Facebook. Preceding to the national consultation, DGDC had two local public consultations in Trafalgar (on July 26, 2023) and Fond Cole on July 27, 2023). 30 people participated in three consultations (18 men and 12 women). There were 178 views of the Facebook live video of the national consultation. Key feedback in these consultations includes health/safety related to power production/transmission near homes, construction impact on communities and tourism, and economic benefit (see Table 1 for the summary of consultations).

¹ Communities along the major highway were consulted, in anticipation of the extension of transmission line network from Fond Cole to Sugar Loaf (near Portsmouth City in northwest) (FSI). The underground cables would be installed in major highway connecting Roseau and Portsmouth. Originally, FSI was within the scope of DGRMP II but was dropped.

Table 1. Summary of public consultations

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)
Community members in Portsmouth, Mahaut, Colihaut, St. Joseph, Fond Cole, and Trafalgar	March 2023	Concerns about electromagnetic field.	WHO has exposure limits, and the design will be within those limits. 69kV is very small and way within the limits. For the most part, lines will be away from communities.	Known hazards from electromagnetic fields are accounted for in the design. The project will be audited and held to WB standards.	Considered in project design
		Type of poles to be erected?	Tubular steel poles, designed for 288 km wind. They are safe at a higher voltage and resilient to Category 5 Hurricane.	N/A	Addressed
		Will my electricity bill be cheaper?	The primary purpose is to reduce dependence on diesel and stabilize and reduce the price of electricity.	The power generated by the geothermal plant will be sold to DOMLEC.	O&M phase
		Can all transmission lines go underground?	33 and 69 kV lines are to dispatch the power to Fond Cole and the north. Having underground and overhead transmissions will ensure continued electricity supply in case of emergency.	It is costly to have all transmission lines underground.	FSI alignment to be determined (overhead or underground) in the follow-on investment.
		How deep under the river do you expect	3-5 metres below the waterbed. We	ESIA to be prepared and implemented	FSI alignment to be determined

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)
		to run these lines? Any effect on the species under the river?	are not trenching the riverbed but drilling under the river.		in the follow-on investment
		ESIA to complete before any work? Can I comment?	Your comments, questions will be used to inform the ESIA and will be included in the final design.	ESIA to be prepared and consulted	National consultation held in August 2023
		Will there be technical people from Dominica understudying and learning so that we will have local people to maintain?	Yes. This has already started with the drilling. So, there are local engineers learning.	Addressed	DGRMP II will also engage local engineers.
		You spoke about high standards of social protection and fairness in compensation. To what degree is this being followed?	We monitor environmental and social safeguards internally, and there also is an external audit. All lands acquired, are duly compensated through a Lands Department led process.	RAP to be prepared and implemented	Draft RAP prepared and consulted
		What happens if people are not compensated?	We do not start construction, unless the people are compensated.	RAP to be prepared and implemented	Draft RAP prepared and consulted
		Given that one is permitted to be within 15m on either side – would you acquire the property there?	It will be a mix of acquisition and easement agreements. The areas with the actual structures will be acquired. Where land use is	RAP to be prepared and implemented	Draft RAP prepared and consulted

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)
			restricted, easement will be applied.		
Public consultations on E&S tools (national and two local consultations in Trafalgar and Fond Cole)	July/August 2023	The proposed power lines are connected to the Fond Cole substation. This substation already houses a thermal power station and is located close to Roseau. Will the proposed project generate additional noise and pose fire risks??	The proposed development will include adequate noise and fire control measures in the design. There will be less reliance on the existing thermal power station after completion of the project. Hence impacts associated with the existing power plant (e.g. noise) will be reduced.	Addressed	ESMP implementation during the construction and operation phases
		If there is a hurricane, would lines be affected?	The overhead lines will be built to withstand higher than category 5.	Communication outreach on safety	SEP implementation during construction and operation phases
		Aren't there any hazards because the line passes through the community near Fond Cole?	No, the lines will be in 1.5 metre trenches; buried in conduit.	ESIA prepared and consulted	ESIA implementation during construction phase
		There will be two power lines. One overhead and one underground. Are they working simultaneously, or one is like a back-up??	They always work in parallel. But if one goes down, another takes over the full load without being overloaded.	Addressed	N/A

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)
		What is the impact for the consumers?	The primary purpose is to reduce dependence on diesel and stabilize and reduce the price of electricity.	The power generated by the geothermal plant will be sold to DOMLEC.	O&M phase
		Fond Cole is the distribution hub. Is the noise going to be totally eliminated?	Yes. The noise comes from the diesel generators. Hours of diesel generation will be for shorter.	Addressed	N/A
		Do you compensate for the land where the wire will pass? What if the lines will pass in the centre of land?	Yes. DGDC will minimize the impact. However, if the rest of the land will be unusable, all land will be acquired.	RAP prepared	RAP implementation before construction
		With respect to deforestation, what areas are you planning to replant trees?	This will be done with the support of forestry division.	ESIA prepared	ESIA implementation during construction phase
		Do you have insurance for the people working (on the project)?	All contractors have to take out insurance for their workers.	LMP prepared	LMP implementation during construction phase
		What will the trenches carry?	Power cables will be in the trenches. The trenches will be about 1.5 metres deep. The community can be affected if they fall into the trenches. Each 200m will take a week of construction.	ESIA prepared	ESIA implementation during construction phase

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)
			There will be dust, noise, traffic congestion.		
		The whole construction impact seems to be underplayed in terms of significance (rated minor). The excavation will be in very busy areas, and people travel to work or tourist sites. Significant inconvenience is expected.	We have noted your comments and note that the construction impact will be significant community health and safety impacts, particularly in the urban areas of Roseau.	Addressed	ESIA/SEP implementation during construction phase
		The workers – about 100 workers, 40% of which are likely to be from overseas. It would be good to see the availability of such housing.	About 40 of those workers will be housed in hotels in the local communities, as done in on-going project.	Addressed	LMP implementation during the construction phase

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)
		In the GRM, it is stated that a low priority grievance would be given a response time of 5 days, and a high priority would be given a time of 30 days. I am of the opinion that it would be the reverse, but I would like a little clarification on that.	Some of the high-risk grievances require further investigations, and that accounts for the longer time.	Addressed	SEP implementation during construction and operation phases

4.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

Different engagement methods are proposed and cover different stakeholder needs as stated below:

4.3. Stakeholder engagement plan

Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Preparation	<ul style="list-style-type: none"> • Project design • Safety of 69kV overhead lines • Land use restrictions • Land acquisition/ easement • ESIA/ESMP • RAP • LMP • SEP • GRM 	<ul style="list-style-type: none"> • Public consultations • Community consultations • FGDs • One-on-one Interviews • Site visits • Surveys • Website • Social media • Radio/TV 	<ul style="list-style-type: none"> • PAPs • Communities in Corridor of Impact (Col) • Vulnerable groups • Tourism sector • Road users • Roadside businesses • General public 	DGDC

Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
			<ul style="list-style-type: none"> Government agencies DOMLEC NGOs/CSOs 	
Construction	<ul style="list-style-type: none"> Project design/update Safety of 69kV overhead lines Land use restrictions Emergency Plan ESIA/ESMP LMP/OHS Traffic Management Plan RAP SEP GRM 	<ul style="list-style-type: none"> Public consultations Community consultations FGDs One-on-one Interviews Site visits Website Social media Radio/TV 	<ul style="list-style-type: none"> PAPs Workers Communities in Col Vulnerable groups Tourism sector Road users Roadside businesses General public Contractors Government agencies DOMLEC NGOs/CSOs 	DGDC
Operation	<ul style="list-style-type: none"> Safety information Land use restrictions Land entry for O&M Emergency plan GRM 	<ul style="list-style-type: none"> Website Social media Radio/TV 	<ul style="list-style-type: none"> PAPs Communities in Col Vulnerable groups General public NGOs/CSOs 	DGDC DOMLEC

DGDC will disclose the final ESIA, RAP, LMP, and SEP on its website. Key information, i.e., safety of higher voltage overhead transmission lines, emergency plans, land use restrictions/easement, traffic management plan, and GRM procedures will also be disclosed on DGDC website. The key information and project implementation progress will be regularly provided to PAPs and community members at consultation meetings, FGDs, and one-on-one interviews. DGDC will produce information brochures on the project, highlighting safety, emergency plans, and GRM procedures. The brochures will be provided to community councils and community members at consultation meetings and by social media. All documents will be produced in English. Creole may be used in some consultation meetings, FGDs, or interviews.

It is important that vulnerable groups are well informed, in particular, on safety and emergency plans. DGDC will coordinate with NGOs, including National Council of Women, Dominica Council on Aging, and Dominica Association of Persons with Disabilities to ensure vulnerable groups are informed and consulted.

4.4. Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and Grievance Mechanism, and on the project's overall implementation progress through DGDC website, social media, and face-to-face engagements, including consultation meetings, FDGs, site visits, and one-on-one interviews.

5. Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Resources

DGDC will implement stakeholder engagement activities. The budget for the SEP is estimated at US\$18,000. The indicative budget is as follows:

Table 2. Indicative Budget for SEP Implementation

Budget Category	Quantity	Unit Costs	Years	Total Costs	Remarks
1. Estimated staff salaries and related expenses					
1a. Staff salaries	2				In project budget
1b. Travel costs	12	\$100	5	\$6,000	Indicative
2. Events					
2a. Public consultations, FGDs, project information/feedback sessions for community councils and community members	1	\$500	5	\$2,500	
3. Communication campaigns					
3a. Information brochures, posters (safety, land use restriction, emergency plan, GRM, etc.)	1	\$1,000	5	\$5,000	
3b. TV, radio, social media (labor requirements, project information, safety, emergency plan, GRM, etc.)	4	\$100	5	\$2,000	
4. Training					
4a. Community councils and community members (project information, safety, emergency plan, GRM, etc.)	1	\$500	5	\$2,500	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:				\$18,000	

5.2. Management functions and responsibilities

SEP implementation will be led by DGDC's Community Liaison Officer (CLO). The CLO will manage and coordinate SEP implementation, including organizing consultations and community engagements,

developing information materials, coordinating with government and non-government stakeholders, and supporting DOMLEC in strengthening their customer services (i.e., communication outreach and GRM). CLO will be responsible for community engagements and GRM. He will regularly carry out consultation meetings with affected community members and site visits and manage the project GRM. The DGDC's Resettlement Specialist will manage the implementation of the Resettlement Action Plan, and the CLO will work closely with that person when needed.

DOMLEC will be responsible for SEP implementation during operation phase. They currently have a PR Officer (customer outreach, including health and safety) and a Customer Service Officer (GRM) in its Commercial Department. TA will develop SEP implementation arrangements during operation phase and build DOMLEC capacity.

The stakeholder engagement activities will be documented in meeting minutes and communication reports.

6. Grievance Redress Mechanism

The main objective of a grievance redress mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. DGDC has external and internal GRMs, which are well established and proven in the on-going project. During construction phase of the DGRMP II, DGDC's external GRM will be used to lodge complaints. DGDC will inform PAPs and community members of DGDC GRM, including how to lodge complaints and how their grievances will be handled (procedures), during preparation and construction phases.

During operation phase, DOMLEC will manage grievances. Under the TA component, the Project will build DOMLEC capacity during construction phase. DOMLEC has a complaint handling mechanism (see Section 6.2). The TA will assess DOMLEC GRM to ensure its robustness to take over the Project GRM functions during the operation phase. As and when required, DGDC's GRM will interface with DOMLEC during operation phase.

6.1. Description of DGDC GRM

DGDC has a GRM manual prepared for the on-going DGRMP I. The manual includes both external/project GRM and internal/workers' GRM. The Social Specialist is responsible for the overall implementation of GRM, while CLO manages the project GRM (internal/workers' GRM is detailed in LMP). The project GRM is functional. Grievances are logged, categorized, and tracked, according to the GRM manual. Grievances under the on-going project are mostly related to civil work, e.g., vibration, dust, noise, and damage to property, in Laudat, Trafalgar, and Wotten Waven communities. As of March 2023, DGDC received 32 grievances. Majority of those have been redressed, except for six open cases. Table 3 describes DGDC's project GRM, and Table 4 describes three risk levels and response timeframe.

Table 3: DGDC Project GRM

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	GM is currently set up to receive grievances at drilling site, community level (in Laudat, Trafalgar, and Wotten-Waven), and national level (in Roseau). The community level coverage (mailboxes) will be extended in Roseau Valley during DGRMP II implementation.		Community Liaison Officer (CLO)
Grievance uptake	Grievances can be submitted via the following channels: <ul style="list-style-type: none"> On-line form: https://www.geodominica.dm/grievance/reporting/ Email: Allan.toussaint@geodominica.com Phone: (767) 448 6178/79; 275 7392 Address: DGDC, Floors 1&2, 18 Kennedy Avenue, Roseau Grievances Mailbox placed at community centres. More grievance mailboxes will be placed in Roseau Valley. 	Weekly	CLO
Sorting, processing	Any complaint received is collected, logged, and ranked by risk level (high, medium, and low). Grievances will be categorized according to the following complaint types: civil work (vibration, dust, noise), damage to property, land acquisition/easement, community health and safety, etc.	Weekly	CLO
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by email or letter	Within 10 days of receipt	CLO
Verification, investigation, action	Investigation of the complaint is led by CLO. A proposed resolution is formulated by GRM Team and communicated to the complainant by email or letter. Response timeframe varies, depending on the risk level (detailed in Table 4).	Within 5 to 30 working days	GRM Team composed of CLO and Social Specialist Officer
Monitoring and evaluation	Data on complaints are collected in GRM database and reported to Managing Director every week. DGDC will have a quarterly GRM review, including the number of grievances received vs redressed and time required for redressal.	Weekly/ Quarterly	CLO GRM Team

Step	Description of Process	Time Frame	Responsibility
Provision of feedback	Complainants will be informed of resolutions in writing. In response to anonymous grievances, the resolution will be published on a visible and accessible notice board at the Community Center. The functioning of GRM will be discussed during community meetings.	Quarterly	CLO

Table 4: Grievance Risk Level and Response Timeframe

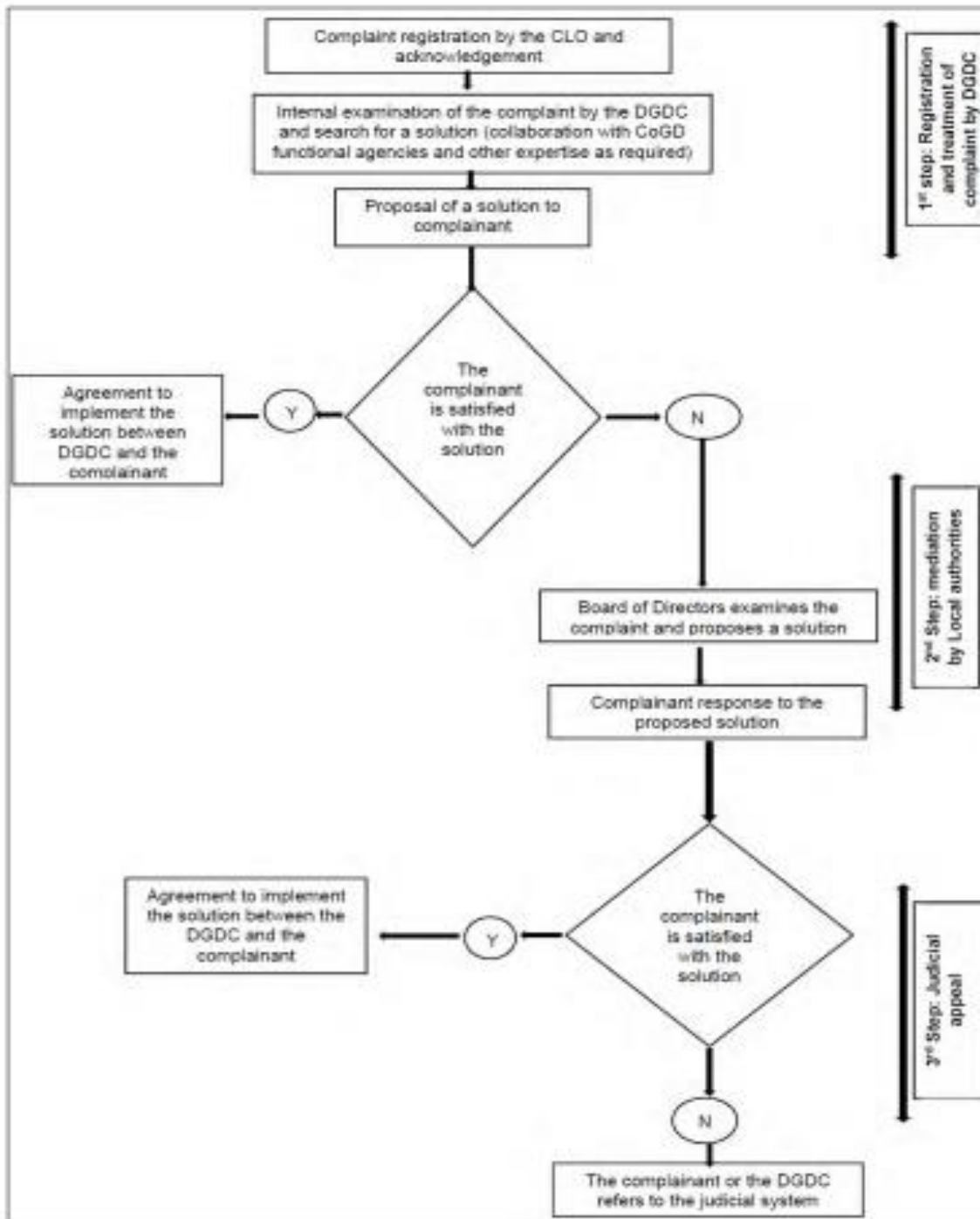
Classification	Risk Level	Response	Timeframe
Low	No or low	CLO will conduct investigation, document findings and provide a response	Within 5 days
Medium	Minor risks associated with environment, health, construction, transportation, etc.	CLO and an appropriate investigation team will conduct investigation. The Site Manager or Occupation Health and Safety Manager may decide to stop work during the investigation to allow the corrective preventive actions to be determined. The CLO will provide a response.	Within 15 days
High	Major risks to health and safety. Grievance related to illegal and abusive activities.	CLO will set up a Major Investigation Team including Managing Director and contractor for prompt investigation and resolution. Work will be stopped in the affected area. The CLO will provide a response.	Investigation and response within 30 days

Figure 5 summarizes the overall grievance flow. DGDC's grievance forms (online and paper) are provided in Annex 1. The GRM accepts anonymous grievances. Both online and paper forms provide an option to submit complaints with no contact information. Feedback will be published on a notice board at community centers and discussed during community engagement. The GRM has an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Grievances will be escalated to DGDC Managing Director and the Board of Directors. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

DGDC has measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the World Bank ESF Good Practice Note on SEA/SH. SEA/SH-related grievances will be referred to the Ministry of Social Services, Community Development, and Gender Affairs. Currently, the Ministry does not have a dedicated GBV program. However, a support mechanism is maintained by the Bureau of Gender Affairs. Community Liaison Officer had training on SEA/SH by World Bank.

The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

Figure 5. Grievance Flow Chart



GRM implementation is monitored through the following key performance indicators:

Table 5. DGDC Project GRM Key Performance Indicators

Impact	Indicator	Performance Goals/ KPIs	Method/Tool/ Frequency
GM attainment	DGDC will review the External Grievance Database, including complaints closed and those unresolved. Number of grievances received per month versus number of grievances resolved.	100% of grievances resolved within the established GM timeframe	External Grievance Mechanism Database and CLO / Quarterly
GM time efficiency	DGDC will review the External Grievance Database, especially the number of days between the grievances submission until its resolution and closure to calculate the average length of time needed to resolve grievances.	Max. 10 days	External Grievance Mechanism Database and CLO / Quarterly
GM Focus/ Risk Areas	DGDC will review the External Grievance Database and if necessary talk to the Community Relations Team to breakdown the grievances topics (e.g. health, safety, etc.) and grievance source	Resolve 100% of grievances from all sources and about all topics. Disseminate information regarding the different solutions when there are recurrent complaints in order to decrease recurrent grievances.	External Grievance Mechanism Database and CLO / Quarterly
Method of grievance reporting	DGDC will review the External Grievance Database and engage with community members to check the use and success of the different grievance reporting methods (e.g., number of grievances received by phone, at the office, website, and boxes).	100% of reporting methods will be functional and accessible at all times.	CLO / Quarterly
GM dissemination	DGDC will monitor all GM informational documents, meetings, and events where the GM was disclosed and explained to the affected communities.	GM dissemination of information in at least 70% of disclosure of information events, consultations and other activities, within each of the stakeholder groups and communities.	CLO Records / Quarterly

6.2 Description of DOMLEC GRM

DOMLEC has a complaint handling mechanism as a part of its customer service charter². The TA component will assess in detail the current functionality of DOMLEC GRM and its robustness and will develop and implement a capacity building plan. The detailed arrangements between DGDC GRM and DOMLEC GRM during operation phase will also be made during the TA implementation.

DOMLEC GRM is managed by its Commercial Department. The GRM has several uptake channels available to customers to put forth complaints or grievances to DOMLEC for resolution:

- In person to a Customer Service Representative at our offices at 18 Castle Street, Roseau;
- Over the phone during regular business hours at 255-6008 or 255-6009, or directly to the Senior Customer Service Representative at 255-6012. The call center has 25 staff;
- In writing to the Customer Service Representative, Dominica Electricity Services, 18 Castle Street, P.O. Box 1593, Roseau, Dominica;
- Via the Contact Us tab on the Company's website (www.domlec.dm);
- Via DOMLEC's Facebook page; and
- Via text to 275-3477.

Once a complaint/grievance is received, DOMLEC will take the following steps to bring the matter to resolution:

1. The grievance/complaint is analyzed then referred to the appropriate section/person for action. It will be expedited for action based on the level of gravity.
2. A case is created and actioned. The customer is given the case number for referencing/tracking purposes.
3. The matter is investigated to determine the facts of the case.
4. After investigation, the customer is notified of the findings.

Customer Service Officer keeps track of customer complaints as per the customer service charter, which sets quality of service standard, including timeline. If the customer is not satisfied with the findings, or does not hear from the Company within seven (7) working days, the customer may contact DOMLEC's Customer Service Officer at 255-6017 for escalation. If the customer is still dissatisfied or does not hear from the Customer Service Officer within five (5) working days, they may further escalate the matter to DOMLEC's Commercial Manager at 255-6018. If no resolution is achieved within five (5) working days, the matter may be escalated to the General Manager at 255-6021. If the customer is not satisfied with the resolution provided by DOMLEC, he/she may refer the matter to the Independent Regulatory Commission (IRC) via telephone at 1-767-440-6634 or email at admin@ircdominica.org.

During the DGRMP II implementation, TA component will review DOMLEC's customer service charter, including GRM, its implementation and staffing. TA will enhance GRM and communication outreach on the safety of 69kv transmission network and the land use restriction.

² <https://www.domlec.dm/download/2018-customer-charter/?wpdmdl=590&refresh=648729be9ba1b1686579646>

7. Monitoring and Reporting

7.1. Summary of how SEP implementation will be monitored and reported


SEP implementation will be monitored, and the implementation progress will be discussed at quarterly GRM review. Monitoring indicators include (a) number of consultation meetings held (at which communities or groups) and (b) number of participants (gender disaggregated). The quarterly review will also assess if community members are adequately informed of civil work schedule, traffic management plan, safety of high voltage overhead transmission lines, land use restrictions, and emergency plans.

7.2. Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary in the course of project implementation. CLO will provide weekly update of GRM to the Managing Director, and the GRM team will have a quarterly review of GRM/SEP implementation. The updates and reviews will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in various ways: DGDC website, consultation meetings, and FDGs with community councils/NGOs/CSOs.

Annex 1. DGDC Grievance Form

On-line form



ALLAN TOUSSAINT

Address: P.O.Box 1454, 18 Kennedy Avenue, Roseau, Commonwealth of Dominica

Email: Allan.toussaint@geodominica.com

Phone: +1(767) 448-6178 /79

Visit Us Anytime

Working Hours:
* Mon - Fri
* 8:00 AM - 4:30 PM

Please use the Form Below to Submit your Grievances

Fair and Impartial Process

Is This an Anonymous Complaint? *
If you Select "Yes", the personal and contact information fields do not have to be filled in.

☒ No ☐ Yes

Name *

--Please Select--

Prefix First Last

Occupation **Gender ***

--Please Select--

COMPLAINANT CONTACT DETAILS

Email *

Enter Email Confirm Email

Landline Phone **Mobile ***

Address

Street Address Address Line 2

Dominica

Town/Village Country

TYPE OF COMPLAINT

Complaint Type *

--Please Select--

COMPLAINANT PREFERENCES

Preferred Contact * **What time is best?**

--Please Select--

:

AM

Hour Minute

What is the best way the DGDC can contact you? Preferred time of day you would like to be contacted.

DESCRIPTION OF THE COMPLAINT:



geodominica.dm



HOME

POWER PLANT

TRANSMISSION NETWORK

PROCUREMENTS

RESOURCES



Email *

Enter Email

Confirm Email

Landline Phone

Mobile *

Address

Street Address

Address Line 2

Town/Village

Country

TYPE OF COMPLAINT

Complaint Type *

COMPLAINANT PREFERENCES

Preferred Contact *

What is the best way the DGDC can contact you?

What time is best?

 :

Hour Minute

Preferred time of day you would like to be contacted.

DESCRIPTION OF THE GRIEVANCE:

Your Grievance *

SUBMIT

Save and Continue Later

Paper

GRIEVANCE REGISTRATION #: /		
* Not mandatory fields. You can submit complaints anonymously.		
Date:	Time:	Filed by:
Complaint received via:		
In person: <input type="checkbox"/>	By Phone: <input type="checkbox"/>	By email: <input type="checkbox"/> Other: <input type="checkbox"/>
Complainant Name:*	Complainant gender:*(drop down) M / F	Complainant occupation:*
Complainant contact (address, tel. number):*		
What is the best way to contact complainant? (drop down – phone/email/letter/in person)		
Preferred time of day to contact complainant:		
<input type="checkbox"/> The complainant is filing an individual complaint <input type="checkbox"/> The complainant is representing a group or a community - Name of the group or community: - Nature of the group or community: - Location/address:		
Description of the grievance:		
GRIEVANCE TREATMENT		
Date of the response:	Filed by:	
Proposed action(s) to remedy to the grievance:		
Complainants acceptance of the proposed action:		
GRIEVANCE CLOSURE		
Date of grievance closure:	Filed by:	
Ending of the grievance treatment:		
Reference in Commitment Register:		