Saint Lucia Urban Resilient Flood Investment Project (P504998)



Stakeholder Engagement Plan (SEP)

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Acronyms and Abbreviation

Acronym / Abbreviation	Definition
CCC	Castries Constituency Council
CBO	Community-Based Organisation
CDP	Constituency Development Program
COSAP	Communication Strategy and Action Plan
CSO	Civil Society Organisation
DIPT	Department of Infrastructure, Ports and Transport
E&S	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework (World Bank)
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard Environmental and Social Specialist
FGD	Focus Group Discussion
FM	Financial Management
GAF	Grievance Acknowledgement Form
GBV	Gender-Based Violence
GIS	Government Information Service
GM	Grievance Mechanism
GoSL	Government of Saint Lucia
GRC	Grievance Redress Committee
GRS	Grievance Redress Service (World Bank)
HEC-RAS	Hydrologic Engineering Center's River Analysis System
IPV	Intimate Partner Violence

KII	Key Informant Interview
LMP	Labour Management Procedure
LUCELEC	St. Lucia Electricity Company
MoA	Ministry of Agriculture
MoEDYE	Ministry of Economic Development and Youth Economy
MoF	Ministry of Finance
NEMO	National Emergency Management Organisation
NGO	Non-Governmental Organisation
NIA	National Implementing Agency / National Infrastructure Agency
NIPP	National Integrated Infrastructure Planning Unit
OKEU	Owen King European Union (Hospital)
PAP	Project Affected Person
PCU	Project Coordination Unit
PDO	Project Development Objective
PCU	Project Implementing Unit / Project Implementation Unit
PM	Project Manager
POM	Project Operations Manual
PROSAF	Positive Reactions Over Secrets and Fears
PSC	Project Steering Committee
RF	Results Framework
RPF	Resettlement Policy Framework
SA	Sexual Abuse
SE	Sexual Exploitation
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SLASPA	St. Lucia Air and Seaports Authority
SLISBA	St. Lucia Small Business Association

SLMS	St. Lucia Meteorological Service
SLPPA	St. Lucia Planned Parenthood Association
SLSWMA	Saint Lucia Solid Waste Management Authority
STO	Social Transformation Officer
SURF-IN	Saint Lucia Urban Resilient Flood Investment (Project)
TBD	To Be Determined
WASCO	St. Lucia Water and Sewerage Authority
WB	World Bank
WRMA	Water Resource Management Agency
XCD	Eastern Caribbean Dollar

1. Introduction

The Saint Lucia Urban Resilient Flood Investment (SURF-IN) Project, focuses on enhancing flood resilience, protecting infrastructure, and safeguarding livelihoods in the highly flood-prone urban areas of Castries and Anse la Raye. This Stakeholder Engagement Plan (SEP), has been developed to meet the requirement of the SURF-IN Environmental and Social Commitment Plan (ESCP), specifically Environmental and Social Standard 10, (ESS 10) Stakeholder Engagement and Information Disclosure, of the World Bank's Environmental and Social Framework (ESF), and follows the guidance provided in the Bank's Stakeholder Engagement Framework (SEF).

The World Bank's broader ESF, consists of the following pillars:

(i) Vision for Sustainable Development
(ii) Environmental and Social Policy for Investment Project Financing
(iii) Ten Environmental and Social Standards (ESSs) to manage project risks
(iv) Directives, procedures, and guidelines (including Environmental, Health, and Safety Guidelines)
(v) Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups

These pillars are aimed at protecting people and the environment from adverse impacts during project implementation and serves as the foundational environmental and social risk management tool inclusive of stakeholder consultation and management for the SURF-IN Project:

Use of the framework ensures that the SURF- IN Project aligns with international best practices to protect people and the environment from potential adverse impacts while maximizing development outcomes. Consequently, the implementation of the SEP ensures that all engagements are guided by the following Core Principles or Pillars:

(i) Transparency in all project communications and flood-risk data sharing.
(ii) Non-discrimination across all stakeholder groups and communities.
(iii) Inclusion of all affected parties, specifically prioritizing marginalized areas.
(iv) Public participation in project planning and infrastructure design.
(v) Accountability through continuous feedback loops and a dedicated Grievance Mechanism (GM).

2. Description and Objective of the SEP

The SEP identifies the project's stakeholders, and any potential challenges which may affect effective consultation with the stakeholders. It outlines the methods which the project will utilize to overcome any barriers to ensure that all stakeholder groups are adequately consulted and engaged. The SEP is inclusive of the grievance mechanism, an avenue accessible to stakeholders to raise concerns, provide feedback, or make complaints about project related activities.

ESS 10 recognizes the importance of open and transparent engagement between project implementer and project stakeholders as an essential good practice. Therefore, stakeholder engagement will be undertaken continuously throughout the process of development, preparation and implementation of

the project, as it has been proven that effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

The SEP will serve as the framework for all SURF-In project stakeholder consultation and engagement. The plan identifies the major stakeholders for the SURF-IN project and highlights the roles and responsibilities of each major stakeholder or grouping. It identifies critical project activities, the most suitable or appropriate methods of consultation for engaging the various stakeholders, and presents proposed timelines and the parties who will be responsible for undertaking key activities. Because flash floods and overflowing rivers hit hardest where homes and small businesses sit closest to waterways, this project places a mandatory focus on vulnerable and disadvantaged groups (including the elderly, low-income households, and persons with disabilities).

2.1 SEP Objective

The overall objective of this SEP is to define a structured program for stakeholder engagement inclusive of public information disclosure and consultation throughout the entire SURF-IN project cycle. In recognition of the significance of effective stakeholder engagement the SEP has been designed with the following specific objectives in mind, namely to:

(i) Inform stakeholders about the project, including the project purpose and scope;
(ii) assess the level of stakeholder interest and support and allow for stakeholders' views to be considered throughout the project development and implementation process;
(iii) promote and provide means for effective and inclusive engagement with stakeholders on issues that could potentially affect them - including stakeholders who may be disadvantaged and vulnerable - throughout the entire project development and implementation process;
(iv) ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and culturally appropriate manner and format;
(v) ensure there are opportunities for stakeholders to provide feedback, ask questions and raise concerns which will contribute to the fostering of strong project-stakeholder relationships,
(vi) ensure the existence of a culturally appropriate and gender sensitive mechanism for filing complaints and grievances
(vii) communicate the benefits of the project at different governance levels and with different stakeholders at the national and community level to ensure meaningful consultation and promote social acceptability of the project.
(viii) gather feedback and information from stakeholders to continually enhance project implementation.
(ix) work constructively with stakeholders to successfully manage their varied interests and ensure any issues raised by stakeholders are properly considered and managed.
(x) close the feedback loop by responding to stakeholders' feedback, including concerns and reported grievances in a timely manner.

The engagement with Stakeholders will take place as an inclusive process, conducted throughout the project life cycle and the SEP will support the development of a strong, constructive, and responsive relationship that is critical to the successful management of the project's environmental and social risks.

It is acknowledged and accepted within this plan that engagement with stakeholders is most effective when initiated at an early stage in the project development process and should be an integral part of early project assessment and decision making, management, and monitoring of environmental and social risks and impacts.

To leave no one behind, a comprehensive, multi-channel engagement strategy will be utilized, including:

(i) Digital & Mass Media: Broadcasts, SMS alerts, and online information portals.
(ii) Direct Dialogue: Town halls, technical workshops, and targeted community consultations.
(iii) Localized Outreach: Household visits and localized focus groups specifically adapted to reach vulnerable populations who may face mobility or communication barriers.

The stakeholder consultation process will serve as a fundamental mechanism for collecting information, perspectives, and feedback from individuals involved in the project. This is critical in ensuring the proper alignment of the project with the needs, expectations, and concerns of all relevant stakeholders.

To ensure that all major stakeholders, are engaged throughout implementation, the Project will focus on four primary stakeholder groupings:

(i) Government Entities: Leading policy alignment, urban planning, and technical execution through the Ministry of Economic Development and Youth Economy.
(ii) Business Sectors: Partnering with local businesses and commerce sectors, including small businesses, impacted by recurring disruptions and flash flooding.
(iii) Municipal bodies: engaging the entities responsible for the maintenance of drainage infrastructure and waste collection in the project areas.
(iv) Local Communities: Engaging residents and community-based groups, directly through sensitisation and awareness raising to foster behavioural change for flood mitigation and flood preparedness.

This SEP is a living document that will be updated periodically as the project progresses.

3. Project Description

The SURF-In Project aims to enhance the Government of Saint Lucia's capacity to prepare for and respond to disaster and climate events, and to strengthen the infrastructure resilience to flood risk management in target urban zones, specifically Castries and Anse La Raye. *The Project Development Objective (PDO) is:* **"To enhance institutional capacities and infrastructure resilience to flood risk in the target areas of Castries and Anse La Raye."**

The project comprises the following components:

Component 1. Institutional and system strengthening for flood resilience and preparedness: This component will finance the detailed engineering designs and construction supervision for selected flood mitigation investments within the Castries and Anse La Raye areas, while also strengthening the

Government of Saint Lucia's capacity to prepare for and manage the impacts of natural hazards and climate change.

Component 2. Enhancement of critical flood-risk reduction infrastructure: The primary objective of this component is to support the construction of prioritized infrastructure investments that will increase the resilience of communities to flood and climate change-induced hazards in Castries and Anse La Raye. The component will support the implementation of prioritized activities designed under component 1, which will support an integrated river basin approach toward urban flood risk management and reduction.

Component 3: Project Management: This component will support essential positions for effective project management by a Project Coordination Unit (PCU) under the leadership of the Ministry of Economic Development and Youth Economy (MoEDYE). These include the staffing of a Project Coordinator, an FM Specialist and an FM Officer, a Procurement and Contract Management Specialist and a Procurement Analyst, an E&S Specialist, and a Project Engineer.

4. Stakeholder Identification and Analysis

4.1 Stakeholder Overview

SURF-In is a multi-stakeholder project with stakeholders from the following key groupings:

Policymakers and Regulators: This group includes the ministries responsible for economic development, Infrastructure, agriculture, forestry, and water resources. This group provides policy support, ensuring that the project aligns with national priorities.

Technical Agencies/Units: These are technical agencies within the Ministry of Agriculture, Forestry Department, the National Emergency Management Organisation (NEMO), the St. Lucia Meteorological Service (SLMS), the National Integrated Infrastructure Panning Unit (NIPP), and the Water Resource Management Agency (WRMA), which will provide support as required throughout project implementation.

Community members and households: this category includes residents of Castries and Anse La Raye, and groups inclusive of youth, women, farmers and community leaders such as principals, teachers and heads of churches and other faith-based organizations.

The Private Sector and Municipal and Statutory bodies: including but not limited to St Lucia Chamber of Commerce, the St. Lucia Air and Seaports Authority (SLASPA) the St. Lucia Small Business Association (SLISBA) the Castries Constituency Council (CCC), and the Anse La Raye Constituency Council.

Utility service providers: including the St. Lucia Electricity Company (LUCELEC), the St Lucia Water and Sewerage Authority (WASCO), and telecommunication companies (FLOW and Digicel).

Representative groups – groups representing various sectors such as architects and engineers' minibus operators, vendors, and fishers.

Vulnerable groups- the elderly, persons with disabilities, affected vendors, minibus operators, small business owners, affected farmers and households.

4.1.1 Affected parties and other interested parties [1]

Affected parties include groups and community members that may be adversely impacted by the Project. Specifically, the following individuals and groups fall within this category: (i) households, farmers and fisherfolk particularly in Anse la Raye, whose property or livelihoods may be negatively impacted by project activities, (ii) business owners and their employees, vendors, particularly in the Castries central business district, minibus operators whose operations may be disturbed by project activities, (iii) schools within the project areas which may be affected by noise and access challenges, and (iv) utilities such as water, electricity and telecommunications.

4.1.2 Other Interested Parties

Other interest groups and interested parties may include Non-Governmental Organisations (NGOs) and Civil Society Organisations (CSOs), professional bodies such as the Association of Professional Engineers, and Architects, government agencies and departments not directly involved in project implementation, but because of their mandate may have interest in the project, such as the Ministry of Social Transformation and the Ministry of Education.

As the SEP is a living document, any new stakeholders who are identified during project implementation will be included.

4.2 Disadvantaged/ vulnerable individuals or groups[2]

Vulnerable groups exist within both project areas. Vulnerable or disadvantaged groups may include but are not limited to the elderly, persons with disabilities and their caretakers, women-headed households, potential project affected persons (PAPs) such as farmers in Anse la Raye, and households and businesses in the flood affected areas.

The situation of vulnerable groups may be further compounded by their lack of or limited access to computers, smart phones and that lack of connectivity places the group at a widespread disadvantage to gaining equal access to project information and the opportunity to have their voices heard. These

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[1] For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

- **Affected Parties:** 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.
- **Other Interested Parties:** 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.
- **Vulnerable Groups:** 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.
- It is important to note that sometimes projects have different components with very different sets of stakeholders for each component. Those different stakeholders should be considered in preparing the SEP.

[2] It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project, and to ensure that awareness raising and stakeholder engagement be adapted to take into account such groups' or individuals' particular sensitivities, concerns, and cultural sensitivities and to ensure a full understanding of project activities and benefits. Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input into the overall process are commensurate with those of other stakeholders.

vulnerable groups would consequently be reliant on physically visiting and manually requesting project facilities in order to benefit from them. This will be time consuming and financially draining for stakeholders that already face severe limitations on their resources and capacity. To avoid further exclusion and marginalization of these groups, the project will place special emphasis identifying representative organizations and leaders for these groups who can be partners in the stakeholder engagement process. With the help of the identified leaders or representatives, emerging vulnerable groups within the communities affected by the Project will be added, further confirmed, and consulted through dedicated means, as appropriate. Table 1 below presents a classification of *the project stakeholders per category and role/ interest/ influence in the project and Table 2 provides information on methods which will be utliised to engage the various stakeholder groupings.*

Table 1: Classification of Project Stakeholders

Stakeholder Category	Stakeholder	Role/ Interest / Level of influence
Policymakers and Regulators:	Ministry of Economic Development Ministry of Finance Ministry of Infrastructure, Ministry of Agriculture and Forestry Ministry of Physical Planning and Utilities Ministry of Sustainable Development	Provides policy support, ensuring that the project aligns with national priorities. High Interest High Influence
Technical Agencies/Units	These are technical agencies within the various ministries such as: The National Emergency Management Organisation (NEMO), The St. Lucia Meteorological Service (SLMS), The National Integrated Infrastructure Panning Unit (NIPP), The Water Resource Management Agency (WRMA)	Provides technical support and data as required throughout project implementation. High Interest High Influence
The Private Sector, Municipal and Statutory Bodies	St Lucia Chamber of Commerce, St. Lucia Air and Seaports Authority (SLASPA) Castries Constituency Council (CCC) Anse La Raye Constituency Council.	Serve as sources of data and as focal points for disseminating project information. High Interest High Influence
Utilities	St. Lucia Electricity Company	Provide support with the

	(LUCELEC) St Lucia Water and Sewerage Authority (WASCO) Telecommunication companies (FLOW and Digicel). The St. Lucia National Trust	removal of infrastructure if required Moderate Interest Moderate Influence
Representative groups NGOs, CSOs and CBOs	Association of Architects and Engineer St. Lucia Small Business Association (SLISBA) Minibus Operators Associations Vendors Association Fisher Cooperatives National Council of and for Persons with Disabilities Anse la Raye Youth Council Anse la Raye Parents Association Anse la Raye Development Committee	Will provide information for preparation of project options and assist in the development of communication and public senstisation products. Also assist with community mobilization. High Interest Moderate Influence
Residents and organisations in the project areas	Residents in both communities Households (female-headed / elderly / Persons with Disabilities/ farmers/ fishers) Schools Wellness Centres Users of recreational spaces such as playing fields, courts and the beachfront	Serve as sources of information for development of project options. Most likely to be affected by project activities. High interest Low Influence
Other Interested Parties	The general public Mass media organisations Visitors to Castries and Anse la Raye	Entities such as the mass media and social media can disseminate project information, but can also influence the public based on the slant of their reports. Moderate interest Moderate influence

Table 2: Methods of Stakeholder Engagement per Stakeholder Category

Stakeholder	Description	Affected/ Interested	Methods of SH Engagement
Policymakers and Regulators	Ministries responsible for economic development, Finance, infrastructure, agriculture, environment, forestry, water resources, physical planning and sustainable development.	Interested	Meetings Formal correspondence Email Site visits Project reports
Technical Agencies	NEMO, WRMA, SLMS, NIPP	Interested / Affected	Meetings Formal correspondence Email Site visits Project reports Project website
The Private Sector, Municipal & Statutory Bodies	Chamber of Commerce, Castries Constituency Council, and Anse-La-Raye Constituency Council.	Interested / Affected	Meetings Formal correspondence Email Site visits Project reports Project website
Local Communities	Citizens and neighborhoods potentially impacted positively or negatively by the project.	Affected	Community meetings Project leaflets Mass media announcements Social media church announcements

			Billboards Town criers
Women	Female demographic within the project's local impact zones.	Affected	Focus groups Meetings Announcements through women associations and networks
Men	Male demographic within the project's local impact zones.	Affected	Focus groups Meetings Announcements through men associations and networks
Youth (15-35 years)	Younger population cohort within the target project zone.	Affected	social media and project website communication Focus groups Meetings
People Living with Disabilities	Community members with specific physical, cognitive, or mobility limitations.	Affected	Home visits Liaising with representative groups
Elderly (Persons over 65)	Senior population cohort within the local communities.	Affected	Home visits, church announcements, town criers
Farmers	Agricultural stakeholders and land operators within the project sector.	Affected	Announcements through networks like Agricultural Extension Officers Site visits Meetings
Women Farmers	Female agricultural operators and	Affected	**Low to Moderate** Networks such as Agricultural

	organized farming groups.		Extension Officers, women's farmers' groups) Meetings

5. Consultation During Project Preparation

During the project preparation phase, the SURF-IN team held focused consultations to ensure the project meets both technical standards and local community needs. This engagement followed two main paths: technical meetings with government agencies—including infrastructure, water, waste, and disaster management departments to coordinate planning data, and targeted focus groups with residents, business owners, and vulnerable individuals in flood-prone areas of Castries and Anse La Raye. The feedback gathered during these sessions directly improved the project's engineering designs, and safety protocols, while setting up a clear system for community accountability before any field works begins.

As part of the process of project development, and preparation, consultations were conducted during the Bank Mission from June 23 to 27. The stakeholders were mainly representatives from government ministries, departments and agencies. Among the stakeholders who were engaged were representatives from the Ministry of Finance (MoF), the Ministry of Agriculture (MoA) and its Forestry Division, Department of Infrastructure, National Integrated Programme and Planning Unit (NIPP), Water Resources Management Agency (WRMA), Saint Lucia Meteorological Services (SLMS), Ministry of Local Government, Castries City Council, Constituency Development Program (CDP) and Anse La Raye Constituency Council.

Government Agency Consultations

The engagements were mainly for fact finding, geared at identifying and analyzing the causes and potential interventions needed to mitigate flooding in the most at-risk areas of Castries and Anse La Raye and focused on sharing data, agreeing on layout responsibilities, and making sure the project aligned with national infrastructure plans. By the end of the mission the four main causes of flooding in Castries and the two main causes of flooding in Anse La Raye were identified.

- **Department of Infrastructure & Castries City Council:** Worked directly with engineering teams to align flood-prevention designs with current town planning and downtown traffic realities.
- **Water Resources Management Agency (WRMA):** Gathered historical rainfall and water flow data to ensure new drainage systems are built wide and deep enough for severe storms.
- **National Emergency Management Organisation (NEMO):** Linked the project's upcoming flood warning systems with existing national disaster response protocols.

- **Saint Lucia Solid Waste Management Authority (SLSWMA):** Coordinated plans to address the plastic pollution and trash that routinely clog city drains.

From 7th to 11th July the Consultant undertaking the prefeasibility and feasibility studies participated in a mission where once again stakeholders as mentioned above but including new stakeholders such as the Ministry of Tourism, the Chamber of Commerce, the Statistics Department and Global Port Holdings were engaged in meetings as well as on the ground site visits. The objective of the engagements was as follows:

1. To obtain information from local stakeholders on the extent, timing and depth of past flood events, including annotating flooded areas on maps and noting down past flood levels and locations which can be used to validate the flood models.
2. To obtain information on any previous flood alleviation interventions and their effectiveness (noting works completed following the Halcrow study in 2004.
3. To obtain available data as it pertains to flooding in the two districts.
4. To discuss with stakeholders the framework and criteria and metrics for appraising flood alleviation measures (for example: feasibility, effectiveness, ecosystem services benefits, amenity benefits) and their weightings
5. To obtain feedback on flood alleviation solutions which are considered to be promising, or conversely are likely to not be feasible.

Stakeholders highlighted what in their view and experience contributes to the flooding challenges in the two districts, citing the lack of maintenance of drains and rivers (desilting) and indiscriminate garbage disposal as the main contributors to flooding. All stakeholders, agreed that the intervention was necessary, but also recommended that the need for regular maintenance of drains and rivers and measures for the control of indiscriminate dumping of garbage, be strongly proposed as measures for increasing resilience to flood risk in the Consultant's report.

Feedback received from the stakeholders centered mainly on the need for continued engagement during preparation of the project to ensure that all parties are kept informed of the project stages thereby creating interest and buy

2. Community Consultations

The project team along with the Communication Consultant held targeted meetings and focus groups with residents in high-risk zones within Castries and Anse la Raye.

- **Anse La Raye River Concerns:** During meetings with community leaders in Anse la Raye and the Anse la Raye Development Committee, attendees pointed out specific riverbank areas prone to

landslides that standard mapping tools had missed. This changed where retention walls will be built to protect local backyard gardens.

- **Castries Business Disruptions:** Downtown business owners and market vendors expressed worry about lost revenue during construction.

- **Protecting Vulnerable Residents:** Focus groups were held with elderly and disabled residents.

During these community meetings, the team officially presented the GM and explained exactly how to log complaints if construction causes property damage or safety hazards.

Summary of Key Consultation Challenges & Corrective Actions

- **Unrealistic Expectations:** During community meetings, residents wanted every drainage problem fixed immediately.

  Corrective Action: The team had to be very transparent about what this specific project covers versus what remains the job of the municipal bodies CCC and Anse la Raye Constituency Council.

- **Consultation Fatigue & Absenteeism:** Pervasive fatigue was encountered, particularly in Castries, due to communities feeling over-researched by past assessments.

  Corrective Action: To correct this, invitations are now dispatched at least two weeks in advance, agencies are required to name alternates to share the time burden.

  A particular challenge has been the absence of the Chamber of Commerce at key consultations, although invitations were extended in each instance.

  Corrective Action: Use a different approach to engage the Chamber, rather than invite the Chamber to meetings planned by the PCU, provide the Chamber with the opportunity to schedule the meeting at a time and using a modality convenient to the members.
  To reach out to the St. Lucia Small Business Association (SLISBA) to capture the views of smaller enterprises.
- **Inter-Agency Confusion:** Discussions revealed ongoing friction regarding which municipal agency holds permanent maintenance custody over physical flood assets (e.g., Castries City Council vs. Ministry of Infrastructure).

  Corrective Action: The Project Unit has escalated this to the Minister for Economic Development to secure maintenance agreements before construction starts.

Additionally, careful attention will be paid to ensuring that future stakeholder engagement sessions are , organized and executed to derive optimal value from these engagements which should lead to better project design and implementation. A summary of the stakeholder consultations held to date is presented in Annex 12.

6. Stakeholder Engagement Program During Project Implementation

6.1 Consultation Timelines and Strategy for Information Disclosure

The PCU will engage stakeholders at various points in the project lifecycle to obtain their views and perceptions on the project, obtain data, build, provide project updates, share documents and other outputs for review and feedback.

Engagement with varying focus will take place at different phases of the project to facilitate stakeholders' input into design of infrastructural as well as soft interventions such as the Communications Plan and training in Early Warning Systems. Consultations will also be held to update stakeholders on project progress throughout implementation.Table 3. below provides an indication of the avenues which will be used for disclosure of project information, the purpose, methods used and the party responsible for the disclosure at each phase of the project.

Project Consultation Timeline and Information Disclosure Plan

Project Phase / Stage	Estimated Timeline	Information to be Disclosed or Shared	Primary Purpose	Method Used	Target Stakeholders	Responsibility
Phase 1: Preparation (Pre-feasibility & feasibility studies)	July 2025 (At the end of feasibility studies)	• ESCP, GM, SEP • Project objectives, components, and designs • Technical, economic, social, and environmental assessments • Draft SEP and relevant environmental action plans	Information disclosure and project buy-in	Website disclosure (Gov. of St. Lucia, Ministry of Economic Development, SURF-In), meetings, presentations, site visits, and physical copies in project communities	• Governmental stakeholders • General populace (with internet access) • Public servants • Residents in the two project areas	PCU
Phase 2: Project Launch	TBD (Following project effectiveness and prior to	• Project description, objectives, components, and benefits • Planned initiatives • Project GM, ESMF, updated SEP, Labour Management Procedure	Information disclosure and receiving/giving feedback	Official ceremony, televised launch for the general public	• Government stakeholders • Municipal and statutory bodies • Private sector,	PCU / Ministry of Economic

	sub-projects)	(LMP), and Results Framework (RF)			NGOs, and CBOs • General public	Development
Phase 3: Announcement of Investment	During Investment & ESMP/RPF Preparation	• Project progress, results, and future milestones • Potential E&S risks and impacts of sub-projects • GM socialization • Feedback collection	Information disclosure and stakeholder feedback	Targeted announcements, community consultations during Environmental and Social Management Plans (ESMPs) and Resettlement Policy Framework (RPFs) preparation	• Affected communities • Government agencies • Relevant NGOs/CBOs	PCU / Consultants
Phase 4: Updates on Implementation	Ongoing (During implementation of investments)	• Updates on project investments • Consultancy reports & Training Plans • Monitoring and maintenance plans • Grievance Reporting Procedures & GM socialization	Information disclosure and stakeholder feedback	PSC/technical meetings, community meetings, training workshops, project signs, press releases, mass/social media interviews, and videos	• Government Ministries, Departments, and Agencies • NGOs, CBOs, and Statutory/Municipal bodies • Private sector entities & local businesses • Residents	PCU / Consultants
Phase 5: Project Closure	In advance of project closure	• Project completion report • Project impacts, benefits, and risks • Lessons learned	Stakeholder feedback and lessons learned	Closing ceremony, press releases, and documentaries	• Government ministries, departments, and agencies • NGOs and CBOs • Statutory and municipal bodies • Private sector & residents	PCU

Project documents such as this SEP, the ESCP, and the Grievance mechanism (GM), project pre-feasibility and feasibility reports, ESIA/ ESMPs and other environmental and social documentation, as required will be disclosed on the websites of the Government of St. Lucia and the Ministry of Economic Development. Regular updates on project developments such as the start of consultancies, and construction work will be provided via the Government Information Service (GIS) news updates and programs, and through press releases via mass media organisations. Periodic stakeholder consultation meetings will be held with key stakeholders to provide project updates and to listen to stakeholder concerns and feedback. Project information such as the grievance mechanism will be shared through leaflets and brochures which will be placed at strategic locations in government offices and in the communities. Separate focus group meetings will take place with vulnerable groups to discuss the impacts of the project on these groups. Pertinent information will be disclosed in English and *Kweyol* as appropriate.

6.2 Consultation Methods and Formats

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

VARYING METHODS will be used to engage stakeholders in decision-making and other processes related to the project including:



Figure 1: Me… holder E…ement

- *individual meetings:* while workshops and other forms of group consultation are the methods most commonly used, individual and preferably face-to-face meetings are important for many reasons, namely to elicit views from key informants, to fill information gaps, and to give individuals or groups an opportunity to raise issues or receive guidance. One-on-one meetings will also be held with any individual or who is negatively impacted by the project.
- *workshops, focus groups and other group discussions:* these enable the "high quality conversations" that allow people to interact, share views and ideas, and develop an understanding of the issue at hand, and therefore contribute meaningfully to project formulation;
- when presentations are made in workshops and other gatherings, the information should be made available in varied ways to *accommodate the range of learning styles and needs of the*

audience. Complex or difficult information should be presented in plain language and face-to-face, and participants must have the opportunity to make inputs into decisions (as opposed to just being told what to do or just being asked to identify issues);

- all participants in the engagement process should respect one another's viewpoint and inputs, and should gain a *sense of personal responsibility* towards the issue and the programme /project under consideration. This helps to increase participant motivation, promote changes in behaviour, and raise external recognition and impact;
- whenever possible, *experienced facilitators* who are neutral (and are perceived as neutral by participants) should be used;
- *other methods and media* can be used, including popular theatre (for example, if role playing can assist a particular community, institution or target group to develop a scenario for a desired intervention) and performances by local artists (to encourage participation and illustrate issues);
- there are a number of *practical ways to facilitate the engagement* of stakeholders, including the presentation of handouts and tokens, the provision of refreshments at meetings and transportation to meetings and events, the scheduling of meetings at times most convenient to target groups, and making arrangements for parents to attend in the company of young children.
- Consideration will be given to the adoption of approaches that are specifically tailored to THE PRIVATE SECTOR. In particular: (i) communication activities that illustrate how companies and businesses, including small and micro enterprises, can incorporate responses to flood mitigation and other natural disasters, climate change and other weather phenomenon in their ethos and practices, and benefit from such; and (ii) special attention will be placed on the engagement of vulnerable groups such as persons living with disabilities, farmers and fishers throughout project implementation.

All engagement activities will be supported by adequate communication and suitable knowledge products and will be guided by the principled of stakeholder engagement presented in Annex 12.

To satisfy 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 will be provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.

- ***Inclusivity and sensitivity****:* Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. In so far as is feasible and possible all stakeholders will be given the opportunity to participate in the consultation process. Equal access to information will be 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 marginalized particularly women, the elderly,

persons with disabilities, displaced persons. Scheduling consultations and other activities at times that are more convenient for the elderly and facilitating their access to these events (e.g. through free transportation) and providing information in a culturally appropriate manner.

Ensuring that meetings are held during hours that will allow the participation of farmers, preferably in the afternoon between 3:00 to 5:00 pm.

` Liaising with Agricultural Extension Officers of the Ministry of Agriculture who can transmit information to farmers, and are key players in the valuation of crops when payment of crop compensation is required. Engaging groups which represent women farmers and providing information in a culturally appropriate manner.

People living with disabilities have limited opportunities to participate in formal processes, yet they are the most directly affected by environmental degradation and natural disasters and should be among the primary beneficiaries of interventions designed to address negative impacts of these natural phenomena. Involving relevant organizations, notably the National Council of and for Persons with Disabilities, in the design of consultation activities and during consultation will help facilitate the participation of persons living with disabilities.

- ***Flexibility:*** In addition *to* traditional forms of face-to-face engagement, the methodology adopted shall involve other forms of engagement, including various forms of internet or phone-based communication.

- ***Language:*** while English is St Lucia's only official language a large proportion of the population is bilingual and more confident conversing in *Kweyol*, particularly Kweyol, is the preferred language especially among the elderly. Consequently, a large measure of interactions will have to be conducted in Kweyol.

- ***Gender:*** Special consideration must be given to the circumstances of two essential gender-based groups viz:
    - Poor, single female heads of households, who are particularly vulnerable and have very limited opportunities to contribute to decisions and actions that affect them; and unemployed young men who are increasingly marginalized and rarely participate in the development process.

This would include ensuring that an equitable number of females are engaged at all stages of the project cycle whenever possible (design, inception, implementation, monitoring, evaluation and reporting).

- Developing project-level action plans that cater to the specific needs of this group including scheduling consultations and other activities at times that are most convenient for women and allow for their full participation.
- Involving relevant national and community-based youth organizations in all consultation processes, including seeking nominations from the Council to participate in workshops and other events that have to do with project design and implementation.

A record of all stakeholder engagements will be kept. Meeting notes will be prepared by the E&S Specialist using the template presented in Annex 10 below and a summary of stakeholder consultations held and meeting reports will be included in the project Semi-Annual Report

6.3 Strategy for Engaging Stakeholders

Project information shared throughout the project lifecycle will allow stakeholders to understand the risks and impacts of the project, and potential opportunities from which they may benefit. Project information will be shared in a variety of ways, reflecting the varying capacities of different stakeholder groups for engaging in stakeholder consultation. Table 4 presents several options which will be tailored to the needs of different stakeholder groups during engagements.

Table 4 Methods of Delivery for Sharing Project Information

Format	Method of Delivery
1. Short videos	• Presented during Zoom events • Posted to the Project's website, the Government of St. Lucia and the Ministry of Finance websites • Transmitted by WhatsApp and facebook
2.PowerPoint presentations	• Presented during Zoom events • Posted to the project website and the GoSL and MoF websites
3. Brochures	• Emailed to stakeholders • Posted to the project website and the GoSL and MoF websites
4. Digital package of full documents	• Posted to the project website and the GoSL and MoF websites as individual files and as a single zipped folder
5. Hard copy of full documents	• Available for reference at the offices of the Ministry of Economic Development • Made available at community facilities like the Anse la Raye Constituency Council and the Castries Constituency Council
6. Posters and diagrams	• Available at community facilities, on minibuses and local stores and shops in Anse la Raye and Castries.

Project information will be shared in a manner that is accessible and culturally appropriate, taking into account specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs. To this end, the development of all communication and information materials will be guided by the following:

- Clear messages using simple language
- Openness, honesty, credibility, and trust in all communications
- Tailored to specific groups

- Content that is interesting to the target audience
- Regularity, timeliness and currency of information
- Use of change agents to get information to some audiences
- Designed for two-way communication, with mechanisms for feedback clearly integrated
- Accessible to all – including persons with disabilities.

6.4 Strategy to Incorporate the Views of Vulnerable Groups

The SEP takes into account the specific needs of disadvantaged individuals and groups facing barriers to fully participate in stakeholder engagement activities. Consequently, the project will include methods to remove obstacles to their participation, by providing information in locations that are easily accessible and ensuring that they can access project benefits.

Women have been identified in the project as a particularly vulnerable group and as such, will be afforded special attention by which the project team can engage in discussions either individually or collectively with them about the project as well as their views and perceptions of the project.

Table 5 identifies measures that will be used to remove obstacles to participation by stakeholder groups facing limitations to stakeholder engagement. These limitations include difficulties with internet connectivity or the ability to access virtual consultations.

Table 5: Factors which may impede full participation and possible mitigation measures

Factors	Vulnerable population	Mitigation measure
Access to technology	Individuals with no internet access, or unreliable access	Rely on dissemination of project information via radio and community newspapers, make hard copies of key documents available from community-based locations, and offer opportunities for one-on-one consultation via phone or WhatsApp
Disability	Impaired hearing or vision, limited literacy	Ensure availability of different channels to disseminate information and obtain feedback (oral, written, virtual).
Language	Creole is spoken in informal settings	Where virtual consultation is provided, ensure local languages are accounted for as appropriate. For in-person, ensure local languages are included in presentation, where appropriate.
Time	Individuals requiring more time to prepare to make arrangements, including single parents, persons with non traditional work hours	N/A for virtual consultation. For in person, provide on-site care for children during the consultation. Design consultations to occur in remote communities rather than in major urban centres.

Transport	Individuals with limited access to a private vehicle and/or located in remote communities	N/A to virtual consultation. For in-person, consider a monetary allocation for participants to secure their attendance. If a number of persons are from a particular vicinity a single transport can be contracted.
Location	For individuals with limited mobility or capacity to travel to primary urban centres.	N/A for virtual consultation. Design of consultation event should ensure communities in remote locations are reached through a number of consultation methods, including but not limited to radio, hard copy brochures, in-person community events.
Stakeholders having unrealistic Expectations	Project affected persons Partner agenices	Being transparent about what this specific project covers versus what remains the job of the municipal bodies CCC and Anse la Raye Constituency Council. Holding timely and relevant engagements Using mass and social media platforms to disseminate project information.
Consultation Fatigue & Absenteeism among SHs	All stakeholders	Giving advanced notice of stakeholder engagements, (at least two weeks). Using modalities convenient to the SHs. Where feasible, allow SHs to determine the date, time and modality for engagements. Encourage SHs particularly partner agencies to use alternates so that one individual will b=not be unduly burdened.

6.5 Monitoring and Reporting

The entity responsible for carrying out stakeholder engagement activities is the PCU under the Ministry of Economic Development and the Youth Economy, with support from technical officers from the Ministry of Infrastructure, Department of Forestry, NEMO, the WRMA and partner agencies such as the Castries and Anse La Raye Constituency Councils. The ESS attached to the project will has overall responsibility for overseeing the stakeholder engagement process.

Comments received from stakeholders will be recorded through detailed meeting minutes. The E&S Specialists is responsible for receiving and recording any queries, concerns or comments regarding the project. Comments and decisions made on comments will be collated and reported back to stakeholders once the final decision on the course of action related to the comments has been made. This will include a brief explanation of how the feedback was taken into account, or the reasons why it was not. The ESS will also maintain a record on the methods used to inform stakeholders on dates and/or locations where they can gather project information and provide feedback.

Stakeholders will be kept informed as project preparation and implementation unfolds. Reports will be presented on project environmental and social performance; implementation of the stakeholder engagement plan and Grievance Mechanism, and on the project's overall implementation progress.

In keeping with ESS10 guidance the documentation of stakeholder engagements will include the following content:

a. Date and location of each meeting, with copy of the notification to stakeholders

b. The purpose of the engagement

c. The form of engagement and consultation

d. Number of participants and categories of participants

e. A list of relevant documentation disclosed to participants

f. Summary of main points and concerns raised by stakeholders

g. Summary of how stakeholder concerns were responded to and taken into account; and

h. Issues and activities that require follow-up actions, including clarifying how stakeholders are informed of decisions.

The E&S Specialist will also monitor the project stakeholder engagement indicators. A stakeholder engagement indicator is a metric used to measure the effectiveness of engaging with individuals or groups who have an interest in a project, organization, or initiative. It helps assess how well stakeholders are involved, informed, and satisfied with the process and outcomes. A template for the matrix is found in Appendix 1.

6.6 Role of the Environmental & Social Specialist

The E&S Specialist is responsible for managing and implementing the SEP with the following specific roles and responsibilities related to the SEP:

- Dissemination of project information.
- Interfacing with stakeholders and respond to comments or questions about the project or consultation process.
- Providing contact information if stakeholders have questions or comments about the project or consultation process.
- Documenting any interactions with external stakeholders.
- Maintaining a database and records for the SEP.
- Coordinating public meetings, workshops, focus groups, virtual platforms, etc.
- Making sure the SEP is being adhered to and followed correctly.
- Raising awareness of the SEP among PCU employees, contracted firms and relevant external stakeholders.
- Implementing, monitoring and reporting on the GM.
- Monitoring and preparing reports on SEP implementation as part of the semi and annual reports; and

- Adjusting the SEP based on new development and changes which occur during project implementation.

6.7 Budget

The budget for the implementation of the SEP will be funded as part of overall project management. Below is the budget for the implementation of the SURF-IN SEP. Table 6 below presents the SEP budget.

Table 6: Budget for SEP Implementation

Budget Category	Quantity	Unit Costs	Times/Years	Total Costs XCD	Remarks
1. Events					
1a. E.g., organization of focus groups	4	500		2000	Provision for refreshment venue transportation if required
2. Communication campaigns					
2a.E.g., posters, flyers	100	10		1000	
2b. E.g., social media campaign	5	150		750	
3. Trainings					
3a. E.g., training on social/environmental issues for PCU and contractor staff	4	200	Year 1 and ongoing	800	
3b.E.g., training on gender-based violence (GBV) for Project Implementing Unit (PCU) and contractor staff	4	200	Year 1 and ongoing	800	
4. Beneficiary surveys					
4a. E.g., mid-project perception survey	*1*	*1000*	*Year 3*	*1000*	
4b. E.g., end-of-project perception survey	*1*	*1000*	*Year 5*	*1000*	
5. Grievance Mechanism					
5a.E.g., training of GM committees	1	150	Year 1	150	
5b. E.g., suggestion boxes in villages	2	100		200	
5c. E.g., GM communication materials	500	5		2500	
6. Other expenses					
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:				**XCD 10,2003**	**USD 3805.00**

[3] 1 USD is equivalent to $2.68 XCD

7. Project Grievance Mechanism [GM]

In the previous version of the SURF-In project SEP, the GM was presented as a standalone document. However, in this version, the GM is incorporated into the SEP. This approach was chosen because the PCU views stakeholder engagement and grievance management as an interconnected, continuous loop of communication. This interconnectivity allows the project to receive grievance reports during regular stakeholder engagements. Further, since ESS 10 recognizes the importance of open and transparent engagement between project implementer and project stakeholders as an essential good practice and one of the objectives of the GM is to establish relationships of trust between the project and its stakeholders, merging the GM into the SEP can assist in forging these relationships and making both processes more transparent. Additionally, integrating the GM directly into the Stakeholder Engagement Plan ensures that stakeholders do not need to navigate separate documents to find project contact information or apprise themselves of the grievance reporting and redress process. The following sections detail the specific procedures, intake channels, timelines, and institutional responsibilities for managing, resolving, and closing the loop on all project-related grievances.

7.1 Purpose and Objectives of the GM

A grievance refers to an issue, concern, problem or claim, whether actual or perceived, that affects the physical, social and/or economic conditions of individuals and/or communities in the project area of influence. A GM refers to methods and processes by which a redressal to a grievance is sought and provided. The SURF-IN project GM is an effective tool for early identification, assessment and resolution of complaints related to the project. The GM provides stakeholders an opportunity to voice complaints or concerns, and provides the PCU with an avenue to clarify and resolve misconceptions about project activities. The objectives of the SURF-IN project-level GM are:

- To receive, address, resolve and respond to all grievances emanating from the project activities in a timely manner; and
- To establish relationships of trust between project staff and stakeholders.

The principal aim of the GM is to provide an avenue through which grievances from the communities of Castries and Anse la Raye, groups, individuals, local authorities, NGOs, and any other affected parties can be resolved amicably in a prompt and timely manner that satisfies all parties involved.

7.2 Grievance Process

The key stages involved in the project's grievance redressal process are presented in Fig 6 below and summarized in the sections that follow.

Fig. 2 - The Grievance Redress Process



1. **Receive** – The Grievance is received through one of the uptake channels.

2. **Record in Grievance Log –** The grievance is recorded in the grievance log and the complainant is informed of approximate timeline for resolution.

3. **Acknowledge receipt of Grievance** – the Grievance Acknowledgement Form is completed signed by the Interim Project Coordinator and forwarded to the complainant.

4. **Screen and Investigate**
   The E&S Specialist will screen and verify Information. If necessary, meet with complainant and call a meeting of the GRC. Meetings notes and deliberations will be recorded in the meeting record form.

5. **Feedback**
   Provide feedback to complainant. Monitor and evaluate the process.

6. **Resolution and Closure**
   If the grievance is resolved the grievance closure form is signed.

7. **Appeal if no Resolution**
   Complainant may escalate to the GRC if dissatisfied with the timeframe or proposed resolution. If unresolved at GRC, the complainant can move to the local court or access the World Bank's redressal service.

7.3 Three Levels of Grievance Redress

Grievances are assessed using a three-level classification system, as follows: Level 1 (Low Risk), Level 2 (Moderate Risk) and Level 3 (High Risk). This risk assessment level and the associated response procedures are described in Table 8. As the level of risk increases, responsibility moves from the E&S Specialist to the Project Manager to the Grievance Redress Committee (GRC).

The SURF -IN GRC has been established and is chaired by the Permanent Secretary of the Ministry of Economic Development and the Youth Economy. The GRC comprises representation from government departments such as Department of Forestry, NEMO, NIPP and the Ministry of Infrastructure, which are all represented on the PSC. The other members of the GRC are the E&S Specialist and the Project Coordinator. The GRC will solicit the expertise of other technical officers and representatives from civil society organisations if the need arises.

Figure 3 below provides a representation of the three (3) levels of grievance redress.



Table 7: Classification of Grievances

Grievance Category	Description	Internal response	Responsibility
Level 1 Low risk	When an answer can be provided immediately, such as issues with the communication of information regarding the project.	Respond immediately to complainant. Record and report. It does not require internal consultation	The E&S Specialist
Level 2 Moderate risk	One-off grievance that requires measured response and actions/ commitments to resolve complaint, such as dissatisfaction with response received at level 1; reports of health and safety concerns, complaints about project timeline issues, field staff or civil works.	The E&S Specialist will review and classify the complaint. If it is classified as a level 2 grievance, the Project Manager will investigate and respond in coordination with the E&S Specialist.	Project Manager
Level 3 High risk	Legal violations on the part of project staff or beneficiaries; Repeated, extensive and high- profile grievances that may jeopardize the reputation of the project, such as cases of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), reports of fraudulent disbursement of funds, failure to deliver promised inputs.	The Social Specialist will review and classify the complaint. If it is classified as a level 3 grievance, the GRC will be in charge of addressing this level complaint. The GRC will provide advice on how to solve complaints within this level. For SEA/SH cases, a list of GBV service providers is kept available by the project. If an incident is reported through the GM, a survivor-centered approach will be used. Any cases of GBV brought through the GM will be documented but remain closed/sealed to maintain the confidentiality of the survivor.	GRC

7.4 The GM Steps, Roles, Responsibilities and Timeline

The main actors for the implementation and functioning of the GM are the Environment and Social Specialist, the Project Manager and the GRC. Roles and responsibilities for the GM are described in Table 8 below.

Table 8: GM steps, roles, responsibilities and timeline

Steps	Role	Responsibilities	Timeline
1. Socialization of the GM Proper and timely notification about the GM channels	E&S Specialist	Inform the Project stakeholders about the available channels to submit grievances.	Throughout project cycle.
		Coordinate the establishment of a signpost in subproject sites.	In place before civil works start, and maintained during construction, and after finalization.
		Support and guide project stakeholders wishing to lodge grievances (in person, by telephone, email, phone calls, or during public/community interaction).	Throughout project cycle.
2. Receipt	E&S Specialist	Receive grievances (including grievances submitted by phone, email, in person, and during public meetings)	Throughout project cycle.
3. Registration	E&S Specialist	Record the grievance on the Grievance Information Form (Annex 2). Add the date of reception and assign a registration number to the aggrieved person	Immediately upon receipt of grievance. .
	E&S Specialist	Categorize the grievances into level 1,2, or 3 for resolution. The Social Specialist reviews the complaint, determines the grievance level and who will be responsible for its resolution. Grievances in levels 1, 2, and 3 will be monitored by the Social Specialist	Immediately upon receipt of grievance. receipt of grievance
	E&S Specialist	Log the grievance in the Grievance Redressal Registration Monitoring Sheet (Annex 3).	Immediately upon receipt of grievance.
	E&S Specialist	Maintain hard copy and electronic records of grievance register and monitor any correspondence.	Throughout project cycle.

4. Acknowledgment	E&S Specialist	Acknowledge the complaint (including providing a description of the process and estimates times to process the grievance). Social Specialist will use (Annex 4) Grievance Acknowledgement Form)	Within 2-3 working days upon reception of grievance.
5. Investigation/ Resolution The investigation will include, but is not limited to, meetings with the grievant/ complainant, in site visits, meetings/ interviews with Project staff and collection of relevant documentation and other forms of evidence. Meeting deliberations and decision will be recorded on the Meeting Record Form (Annex 5). Community representatives or representatives of the complainant will be allowed to sit in these meetings.	E&S Specialist	For level 1 complaints, investigate and evaluate the grievance and provide a response to the grievance.	Within 3-5 working days upon reception of complaint
		Provide proper and timely information on the solution worked out for each grievance for all levels.	Depending on the level of grievance, but no longer than within 10 working days of receipt of grievance
		Inform the Project Manager on level 2 and 3 grievances at the earliest plausible time.	Within 1 working day of registration of level 2 or 3 grievance.
		Ensure the GM procedure is being adhered to and followed correctly for all levels	Whenever a complaint is addressed.
		Ensure all grievances are satisfactorily resolved in a timely manner.	Within 3-5 working days for level 1, 5-10 for level 2 and -10-30 for level 3.
	Project Manager	For level 2 complaints, in coordination with the Social Specialist, investigate and evaluate the grievance and provide a response to the grievance	Within 5-10 working days upon receipt of complaint.
	E&S Specialist	Support Project Manager in handling level 2 grievances (including registration, communication with stakeholders, meetings organization, etc.)	Whenever a level 2 grievance is addressed
	GRC	For level 3 complaints, investigate and evaluate the grievance and provide a response to the grievance	Within 15-30 working days upon reception receipt of complaint.
	E&S Specialist	Support GRC in handling level 3 grievances (including registration, communication with stakeholders, meetings organization, etc.). For meetings, Social Specialist will fill the form in Annex 5.	Whenever a level 3 grievance is addressed
	Project Manager	Inform the WB about all level 3 grievances as soon as possible.	No later than 5 working days after receiving the level 3 complaint

	E&S Specialist	Once a resolution has been agreed and accepted, the complainant's acceptance will be obtained on the GRC Resolution Form included as Annex 6. The E&S Specialist will provide this form to the aggrieved for any level 1, 2 or 3 complaints.	Within 3-5 working days of resolution.
6. Monitoring and reporting	E&S Specialist	Prepare the Semi-Annual Report on the GM of the project.	Semi-annually
	Project Manager and E&S Specialist	Ensure the grievance mechanism procedure is being adhered to and followed correctly.	Throughout project cycle.
	Project Manager and E&S Specialist	Ensure all grievances (including those in level 3) are satisfactorily and timely resolved.	Throughout project cycle.
	Project Manager and E&S Specialist	Adjust the process based on lessons learned during implementation	Throughout project cycle.

7.5 Available Channels to Submit Grievances

Complaints to the SURF-IN Project can be made in person, writing, verbally over the phone, emails or social media as detailed in table 9 below. The public, especially persons living in the project area of influence, will be informed about the project activities, as well as where they can submit their concerns, who will be responsible and the timeframe of the response.

The SURF-IN project E&S Specialist and the Project Coordinator can be contacted by stakeholders with any questions, concerns, or recommendations regarding the project. Any reports received will be recorded in the Grievance Information Log.

Stakeholders including projected affected persons within Castries and Anse la Raye, may also contact project focal points such as the Social Transformation Officer and the Anse la Raye Constituency Council and the Castries Constituency Council who will then direct the concerned or affected party to the PCU. All grievances received by the project will be recorded in the log and reported to the WB every 6 months.

Table 9: Contact information for submitting a grievance

Step	Role Description of Process	Time Frame	Responsibility
Grievance uptake	Grievances can be submitted via the following channels: - Grievances can be made verbally to the Environmental and Social Specialist (E&S Specialist) in person at stakeholder engagement meetings. - By telephone, By phone at telephone number: 758 468 2413 - and the person receiving the call will guide the complainant toward the proper channel. - By email to the following addresses: madonna.monrose@govt.lc vincent.peter@govt.lc - By letter addressed to: **Project Coordinator** Urban Resilient Flood Investment Project Project Coordination Unit (PCU) Ministry of Economic Development 2nd Floor, Finance Administrative Centre Pointe Seraphine Castries - By lodging a complaint on the SURF-In website https://surfinprojectstlucia.com/ ***Note that complaints can be anonymous.*** The GM includes appropriate channels for receiving GBV related complaints. All GBV complaints will be handled directly by the E&S Specialist who has been	Throughout Implementation	ESS

	trained in the handling of these cases, consistent with the WB guidance notes. The GM also incorporates channels to address worker related complaints that are transmitted by the contractors and sub-contractors. All project workers will be trained on the use of the GM and its SEA/SH aspects.		

7.6 GM Appeals Process

An appeals process is available at the national level for concerns that cannot be resolved directly by the GM. Appeals should be submitted either by email to the PCU using one of the channels listed in Table 10 above. The appeals process provides a multi-tiered pathway for resolution, ensuring that all grievances can be escalated. The general pathway for appeals is as follows:

1. Project-Level Review: If a complainant is not satisfied with the resolution provided by the initial GM process, they may request a review by a higher authority within the project's management structure. This could involve escalating the issue from the PCU to a senior official within the Ministry of Finance, for a second assessment.
2. National Redress Mechanisms: Complainants always retain the right to access national legal and administrative redress mechanisms. Depending on the nature of the grievance, this may include lodging a complaint with the national Office of the Ombudsman, relevant environmental or planning authorities, or pursuing legal action through the national court system. The project will provide information on these national avenues upon request.
3. WB Grievance Redress Service (GRS): As a final recourse, communities and individuals who believe they are adversely affected by a WB-supported project may submit their complaint to the WB's independent Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Information on how to submit complaints to the GRS is available on their website (http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service). Complainants may submit their complaint in English or the local language. This pathway is available to complainants at any time, regardless of whether they have first used the project-level GM.

7.7 Socialization/Publicization of the GM

The E&S Specialist is responsible for information dissemination on the GM. The Social Specialist will inform all PCU staff, members of the PSC and GRC and employees of consultants and contractors, as well as other project stakeholders on the project GM and explain to them the procedures and formats to be used including the reporting procedures.

Awareness campaigns through mass and social media will be conducted targeting project stakeholders to inform them on the availability of the mechanism. The GM will also be published on the SURF-IN project website as well as the websites of the Ministry of Finance and the Government of St. Lucia. At sub-project sites in Castries and Anse la Raye sign boards will be erected indicating the existence of the mechanism and a phone number, email and address for further information. The GM will be translated into Kweyol if required.

7.8 Anonymity

Grievances can be submitted without providing the complainant's name or contact details with the understanding this might be difficult in some cases. If the grievance registration form is not available, the following key information should be noted:

- The Project's name
- Name of the person lodging the grievance (if provided)
- Contact information of affected person (if provided)

7.9 Freedom from Retaliation

There will be no retaliation towards individuals seeking to resolve a grievance by means of the GM.

7.10 Addressing Gender-Based Violence (GBV)

To address GBV, the project will follow the guidance provided on the WB Technical Note "Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Civil Works.[4]

This GM follows the official WB definitions described on the Technical Note. GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed gender differences. GBV includes acts that inflict physical, mental, sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life.

Sexual Exploitation (SE) refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual Abuse (SA) is an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment (SH) is any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

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4 [12] Source: https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099430304232515972

GBV grievances will be received through any of the available channels and will be considered level 3 grievances investigated and addressed by the GRC. A list of GBV service providers is kept available by the project (Annex 7). The project will also utilise the GBV referral Pathways in Annex 8 to ensure appropriate care and attention is provided to the survivor. Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity and confidentiality of the complainant and applying the survivor-centered approach[5]. See Annex 9 for an illustrative description of the approach. Any cases of GBV brought through the GM will be documented but remain closed/sealed to maintain the confidentiality of the survivor. The WB will be notified as soon as the Project Coordinator and the E&S Specialist learn about the complaint.

The Project Operations Manual (POM) includes a Code of Conduct that addresses procedures for referring GBV incidents to the corresponding legal authorities, including for potential prosecution under the Criminal Code. If a GBV-related incident occurs, it will be reported through the GM, as appropriate keeping the survivor information confidential. Annex 7 of this SEP provides an initial mapping of GBV services that will be updated according to the timelines of the ESCP to ensure the information is current.

7.11 Grievance Mechanism Budget

The estimated annual budget for GM implementation is detailed in the overall SEP Implementation Budget and represented in Table 6 above.

[5] The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions

8. Annexes

Annex 1 – Stakeholder Engagement Indicator

Indicator	Definition	Frequency	Datasource	Methodology for Data Collection	Responsibility for Data Collection
Beneficiary satisfaction with project's stakeholder engagement process, of which are women and youth (%)	This indicator will measure the average citizen satisfaction rate with the project's stakeholder engagement process. This indicator aims to report on the effectiveness of the stakeholder engagement processes in the project. The planned project surveys will be extended to obtain feedback from community members on their satisfaction with: (i) access to project information and awareness of decisions taken, (ii) their opportunities to provide feedback and participate in the dialogue; and (iii) the responsiveness of the implementing entity to feedback provided. These criteria will be rated on a 1-5	Annually. The NIA in the 1st year and the PCU will start reporting from Year 2 of the project.	Perception survey	Perception survey. Measurement methodology will be defined by the NIA during year 1 of the Project and prior to launching the surveys.	Project Officer with the support of the E&S Specialist

	scale and will be equally weighted. In addition, qualitative feedback will be collected as well to improve the stakeholder engagement processes, if needed. For example, what is working well? How can the project improve its information dissemination strategy? etc. The PCU will oversee this survey and report annually (PCU will start reporting from year 3 of the project). Results will be gender disaggregated. Detailed mechanisms for collecting this data will be developed in year 1 of the Project with the support of the Bank				
Grievances responded to in the stipulated time.	The indicator will measure the proportion of grievances responded to in the stipulated time, as defined in the SEP.	Semi-annual	Progress Reports, Measurement methodology will be defined by the NIA.	Progress Reports prepared by the PCU	The E&S Specialist

Number of community meetings held to discuss project progress, disaggregated by participation rate, of which women and youth (%)	The indicator tracks the frequency of organized community meetings aimed at discussing the progress of the project and related topics. It measures the level of community engagement by recording the number of such meetings and the participation rate, with a specific focus on the inclusion of women and youth.	Semi-annual	Progress Reports, Measurement methodology will be defined by the NIA.	Progress Reports prepared by the PCU	The E&S Specialist

Annex 2 – Grievance Information Form

Date/Time received:	Date: (dd-mm-yyyy) Time: □ am □ pm	
Name of Grievant:		□ You can use my name, but do not use it in public. □ You can use my name when talking about this concern in public. □ You cannot use my name at all.
Company (if applicable)		□ You can use my company name, but do not use it in public. □ You can use my company name when talking about this concern in public. □ You cannot use my company name at all
Contact Information:	Phone: Email address: Address: (Kindly indicate the preferred method of communication)	
Details of grievance: (Who, what, when, where)	□ One-time incident/complaint □ Happened more than once (indicate how many times): _____ □ Ongoing (a currently existing problem)	
How would you like to see issue resolved?		
Attachments to the grievance/complaint: (e.g. pictures, reports etc.)	List here:	

_____ _____

Signature- Project personnel (to confirm receipt only) **Date (dd-mm-yyyy)**

For PIU/NIA use only:

Grievance No: _____

Grievance Category:

☐ Problems during material transport ☐ Smell

☐ Blocked road access ☐ Problem with project staff

Annex 3 – Grievance Redressal Registration Monitoring Sheet

#	Name of Grievant/Complainant	Date Received	Grievance Description	Name of Grievant Owner	Requires Further Intervention	Action(s) to be taken by PCU/NIA	Resolution Accepted or Not Accepted and Date of Acceptance/Non-acceptance
1.							
2.							
3.							
4.							

Annex 4 – Grievance Acknowledgement Form (GAF)

The SURF -IN Project acknowledges receipt of your complaint and will contact you within 10 working days.

Date of grievance/complaint: **(dd/mm/yyyy)**	
Name of Grievant/Complainant:	
Complainant's Address and Contact Information:	
Summary of Grievance/Complaint: (Who, what, when, where)	
Name of Project Staff Acknowledging Grievance:	
Signature:	
Date: **(dd/mm/yyyy)**	

Annex 5- Meeting Record Form

Date of the Meeting:

Grievance No:

Venue of Meeting:

Details of Participants:

Complainant	Project/Government

Summary of Grievance:

Meeting Notes:

Decisions taken in the meeting / Recommendations of GRC:

Issue Resolved / Unresolved: _____

Signature of Chairperson of the meeting: _____

Name of Chairperson: _____

Date (DD/MM/YYYY): _____

Annex 6 - GRC Resolution Form

Result of Grievance Redressal

Grievance No:	
Name of Grievant/Complainant:	
Date of Complaint:	
Summary of Complaint:	
Summary of Resolution:	
Resolved at:	□ First Level □ Second Level □ Third Level
Date of grievance resolution (DD/MM/YYYY):	

Signature of Complainant in acceptance of the suggested grievance resolution:
Name:
ID number:
Type of ID:
Date (dd –mm – yyyy)

Signature of E&S Specialist and Project Coordinator:	
1)	2)
Name	Name
Place	Place
Date (dd –mm – yyyy)	Date (dd –mm – yyyy)

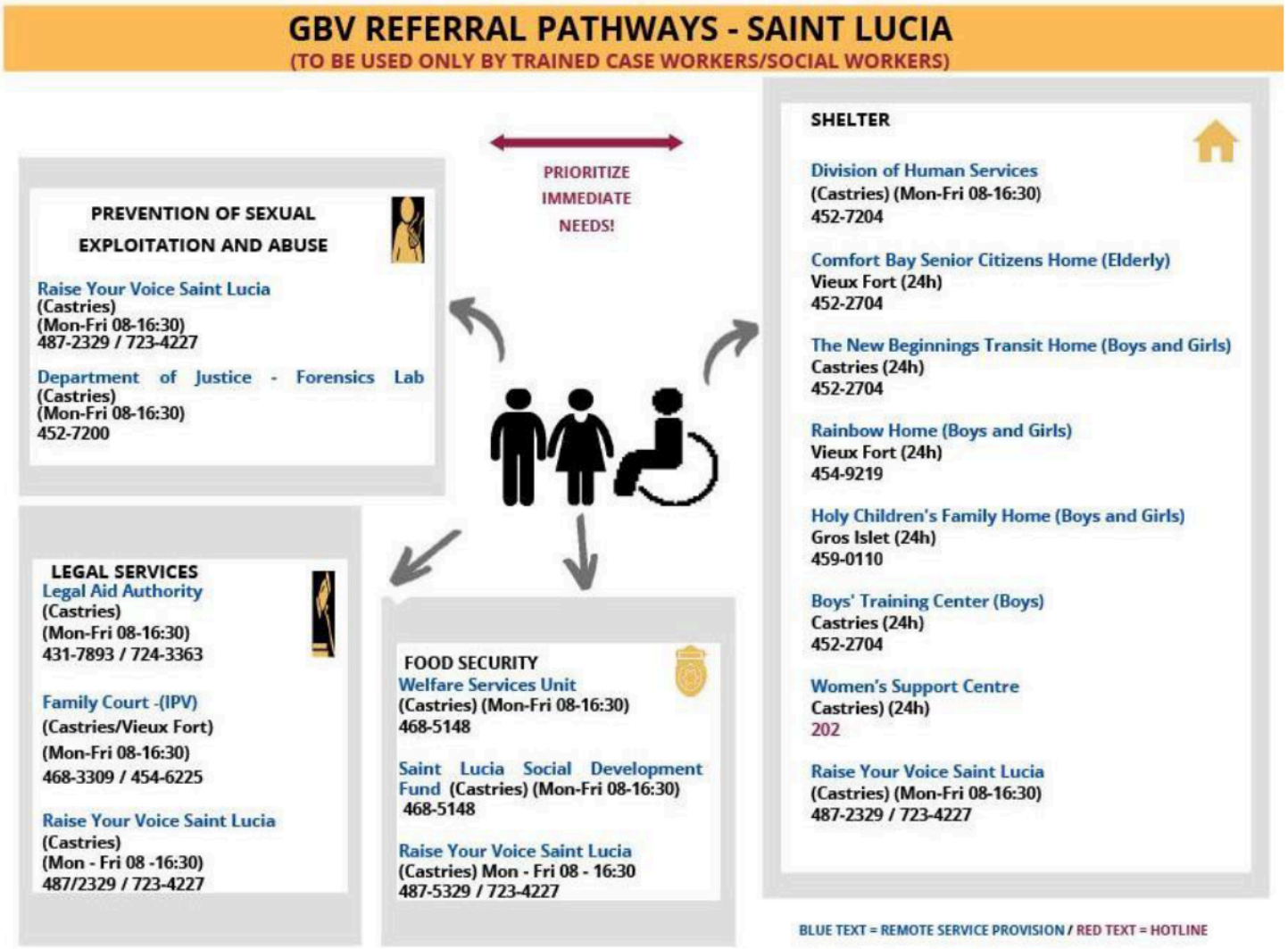
Annex 7 - GBV Service Providers in St. Lucia

Service Providers	Service Provided	Address	Telephone	Other
Attorney General	Case Management	2nd Floor Francis Compton Building, Waterfront, Castries	468-3202	
Office of the Director of Public Prosecution	Case Management		452-3636 468-3185 468-3017	slucps@gmail.com
Family Court	Case Management	Peynier Street, Castries	468-3308	familycourt.slu@gmail.com
Criminal Investigations Department	Case Management	Castries Vieux Fort	456-3770 456-3817 456-3926	
Vulnerable Persons Unit	Case Management Investigates sexual offences against minors, women and men.	Vulnerable Persons Team South North	456-3908 456-4050 4051 4052	
St. Lucia Against Human Trafficking	Provides human trafficking victims and survivors with access to critical support and services to get help and stay safe.	Ministry of Home Affairs, Justice and National Security 1st Floor Sir Stanislaus Bldg. Waterfront Castries	468-3754	police@antitraffickingslu.org

Department of Gender Affairs	Psychosocial Support Livelihood Support	Ground Floor Georgian Court Bldg. John Compton Highway, Castries	716-3123	gender.relations@govt.lc
Abuse Hotline	Psychosocial Support		202	
St. Lucia Crisis Centre	Psychological Support Livelihood Support Assistance with basic needs such as food and shelter	107 Chausse Road, Castries	453-1521 712-7574	stluciacrisis@gmail.com
Women's Support Centre	Legal Aid Psychological Support Livelihood Support Assistance with basic needs such as food and shelter		458-4470	WSCCENTER2001@GMAIL.COM
Raise your Voice St. Lucia Inc	Psychological Support Livelihood Support	Manoel Street, Castries	726-0473 487-2329	raiseyourvoiceslu@gmail.com https://ryvslu.org/
Positive Reactions Over Secrets And Fears (PROSAF)	Psychological Support	PO Box 973 Castries	724-9991	info@prosafe.org https://prosaf.org
United and Strong	Assistance for LGBTI persons	P.O. BOX 772 Castries,	450-0976	unitedandstrongstlucia@yahoo.com www.facebook.com/Unitedandstrongstlucia/

St. Lucia Planned Parenthood Association	Sex education counselling, Sexual and reproductive health services	52 John Compton Highway	452-4335 Hotline: 459-7933 Whatsapp 722-1234	slppa758@gmail.com
OKEU Hospital	Medical Health Services	Castries	458-6500	
St. Jude Hospital	Medical Health Services	Vieux Fort	454- 6041	
Castries Health Centre	Medical Health Services	Chaussee Road Castries	452-4416	
Gros Islet Polyclinic	Medical Health Services	Gros Islet	450-9661	
Babonneau Wellness Centre	Medical Health Services	Babonneau		
National Mental Wellness Centre	Psychological Support	Castries	458-2713 453-0069	

Annex 8: GBV Referral Pathways in St. Lucia



GBV REFERRAL PATHWAYS - ST LUCIA

(TO BE USED ONLY BY TRAINED CASE WORKERS/SOCIAL WORKERS)

MEDICAL & SECURITY SERVICES - DIRECTORY OF OTHER CENTRES NOT LISTED ON PATHWAYS

FAMILY PLANNING SERVICES

Ansa La Raye - (Mon- Fri- 08.00-16.30)
Anse La Raye Health Centre - 451-4225
Jacmel Health Centre - 451-4004

Babonneau - (Mon- Fri- 08.00-16.30)
Fond Assau Health Centre - 450-5939
La Guerre Health Centre 458-9222

Canaries - (Mon- Fri- 08.00-16.30)
Canaries Health Centre - 459-4430

Castries - (Mon- Fri- 08.00-16.30)
Castries Health Centre - 452-4416
Babonneau Health Centre - 450-5858
Bexon Health Centre - 452-1261
Ciceron Health Centre - 453-7934
Antrepot Health Centre - 452-1873
La Clery Health Centre - 452-4303
La Crois Maingot Health Centre- 451-4248
Ti Rocher Health Centre - 452-3529
Vanard Health Center - 451-4247

Choiseul - (Mon- Fri- 08.00-16.30)
La Fargue Health Centre -459-3238
Mongouge Health Centre - 459-3123
Saltibus Health Centre - 455-1589
Delcer Health Centre - 459-3971

Dennery - (Mon- Fri- 08.00-16.30)
La Ressource Health Centre - 453-3312
Richford Health Centre - 453-3355

Gros Islet - (Mon- Fri- 08.00-16.30)
Grand Riviere Health Centre - 450-1651
Monchy Health Centre - 450-1319

Micoud - (Mon- Fri- 08.00-16.30)
Desruisseaux Health CentreD - 455-0449
Micoud Health Centre - 454-4230
Mon Repos Health Centre - 455-3229
Ti Rocher Health Centre - 455-4520

FAMILY PLANNING SERVICES

Soufriere - (Mon- Fri- 08.00-16.30)
Etangs Health Centre - 459-7582
Fond St Jacques Health Centre - 459-7595

Vieux-Fort - (Mon- Fri- 08.00-16.30)
Laborie Health Centre - 454-6930
Grace Health Centre - 454-8357
Vieux-Fort Health Centre - 454-6337
Belle Vue Health Centre - 454-8001

SPECIALIZED SEXUAL AND REPRODUCTIVE HEALTH SERVICES

Castries - (Mon- Fri- 08.00-16.30)
Adolescent Health Clinic
Castries Health Centre - 452-4417

Vieux-Fort - (Mon- Fri- 08.00-16.30)
Vieux-Fort Health Centre - 454-6338

SEE AMPHSS DIRECTORY FOR LICENSED MENTAL HEALTH & PSYCHO-SOCIAL SUPPORT (private)

COMMUNITY POLICE STATIONS

Ansa La Raye - (24/7)
Anse La Raye Police Station - 456-3600

Canaries - (24/7)
Canaries Police Station - 456-3610

Castries - (24/7)
Babonneau Police Station - 4506-4120
Marchand Police Station- 456-3885

Choiseul - (24/7)
Choiseul Police Station - 456-3635

Dennery 24/7)
Dennery Police Station - 456-4090
Richford Police Station - 456-3690

Gros Islet - (24/7)
Gros Islet Police Station - 456-3839
Rodney bay Police Station - 456-4062

Marigot - (24/7)
Marigot Police Station - 456-3829

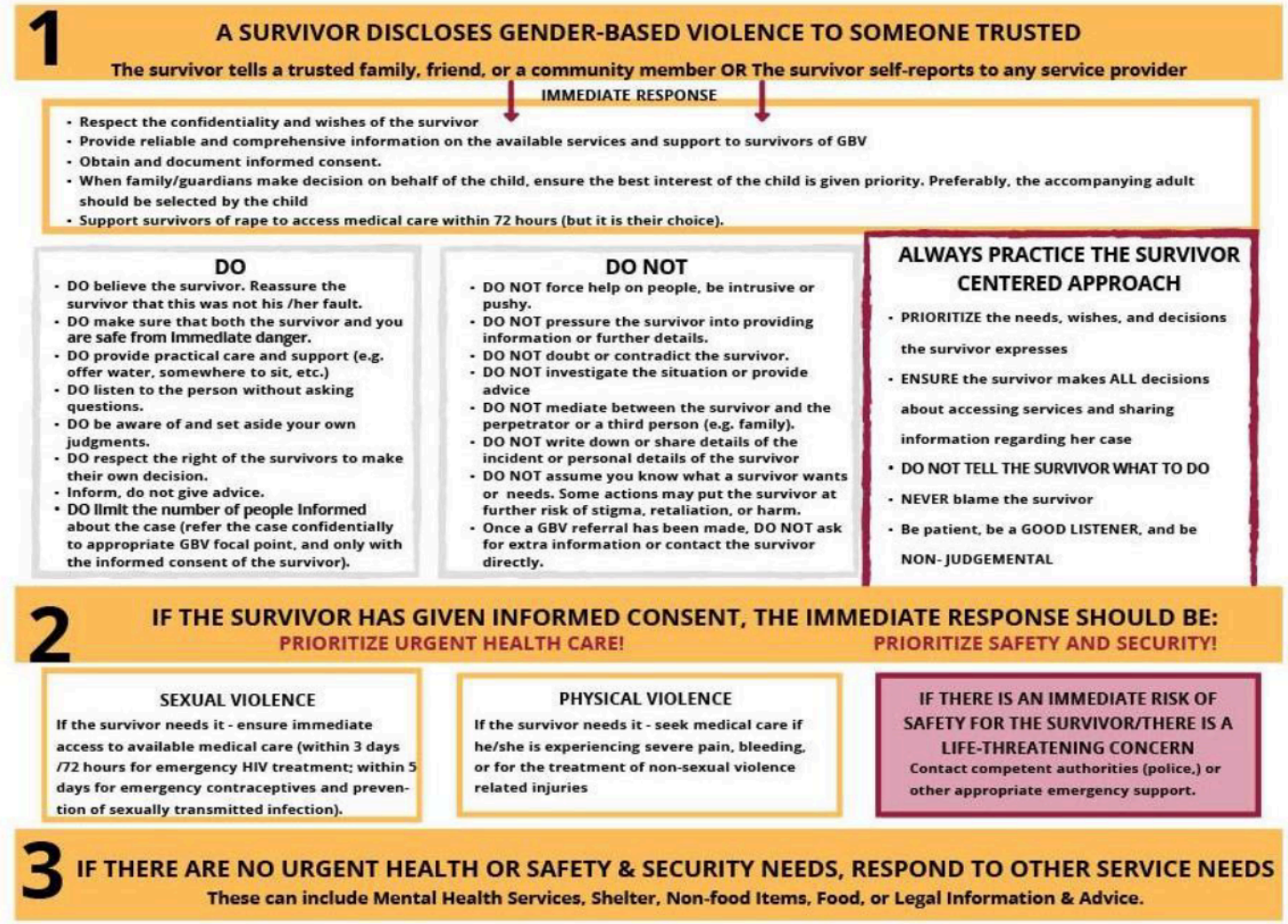
Micoud - (24/7)
Micoud Police Station - 456-3670

Soufriere - (24/7)
Soufriere Police Station - 456-3620

Vieux-Fort - (24/7)
Laborie Health Police Station - 456-3645
Vieux-Fort Police Station - 456-3905

BLUE TEXT = REMOTE SERVICE PROVISION / RED TEXT = HOTLINE

Annex 9 – Description of the Survivor Centered Approach



Annex 10: Template for recording Stakeholder Engagement Notes

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback received and concerns expressed	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)

Annex 11: **Log of Stakeholder Consultations**

Date	Stakeholder Category / Attendees	Location & Format	Core Topics & Key Outcomes
June 23–27, 2025	**Institutional:** MoF, MoA, DIPT, NIPP, WRMA, SLMS, CCC, and Constituency Councils.	Castries; Technical Workshops.	**Fact-Finding Scoping:** Shared initial hydrological telemetry data, mapped regulatory jurisdictions, and aligned flood-prevention parameters with town planning frameworks.
July 7–11, 2025	**Community & Sector:** Local residents, market vendors, Chamber of Commerce, and tourism representatives.	Castries Basin & Anse La Raye; Site Walks.	**Ground Validation:** Walked flood zones to physically trace historical storm levels, evaluate old Halcrow infrastructure, and prioritize local maintenance hotspots.
September 25, 2025	**Institutional:** Affiliated government ministries, agencies, and departments.	Castries; Preliminary Options Review.	**Initial Options Assessment:** Initiated multi-criteria analysis discussions on the first set of technically viable structural and nature-based solutions.
October 22, 2025	**Institutional:** Technical representatives from Ministry of Agriculture/Forestry, WRMA, and Met Services.	Virtual Workshop; Multi-Criteria Review.	**Economic Impact Validation:** Recapped preliminary data, assessed flash flood options against economic damage models, and analyzed downstream sediment/waste blocks.
November 17, 2025	**Internal Project Teams:** PCU Project Unit, World Bank, and Pre-Feasibility Consultants.	Castries; Logistics Briefing.	**Mission Strategy Confirmation:** Verified site walk schedules, multi-criteria targets, and district training logistics for the active field week.
November 18, 2025	**Institutional:** Technical officers from Forestry, WRMA, Civil Engineering,	Castries; Technical Workshop.	**Siltation & Asset Management Frameworks:** Reviewed

	and Ministry of Infrastructure.		pluvial flood models. Stakeholders raised concerns regarding the lack of drainage maps and defined maintenance boundaries between CCC and central ministries.
November 19, 2025	**Community Leadership:** Village council heads, youth representatives, fishers, and local business owners.	Anse La Raye; Field Walks & Evening Town Focus Session.	**Hotspot Verification:** Walked target zones to isolate structural trouble spots. In the evening, residents reviewed levee designs and submitted local proposals to connect flood works with local livelihoods.
November 20, 2025	**Institutional:** Government engineers, technical specialists, and hydrologists.	Castries; Hands-On Training.	**Capacity Building Framework:** Conducted foundational HEC-RAS hydraulic modeling sessions using the active Castries and Anse La Raye watershed profiles.
November 21, 2025	**Institutional:** Technical directors and managers from WRMA, Meteorological Services, and NEMO.	Castries; Review Workshop.	**Early Warning Integration:** Reviewed functioning and gaps of the Flash Flood Guidance System. Staffing shortages, budget allocations, and technical qualifications were isolated as operational risks.
February 9, 2026	**Internal Project Oversight:** Project Steering Committee (PSC) Members (4 Female, 4 Male).	Castries; Official Meeting.	**Safeguard Setup:** Sensitized heads on the World Bank's ESF. Formally established the Grievance Redress Committee (GRC) and selected three oversight members.
March 9, 2026	**Local Government Link:** Social Transformation Officer (STO) for Anse La	Anse La Raye; In-Person Consultation.	**Local Alignment:** Positioned the STO as a local intake hub for

	Raye.		grievances. Identified the need for school eco-clubs and discussed livelihood support for vulnerable women. STO flagged local community group fatigue.
March 17, 2026	**Internal Project Oversight:** Grievance Redress Committee (GRC) Members.	Castries; Capacity Session.	**GM Operationalization:** Trained members on intake channels, processing timelines, and sensitive protocols for handling potential SEA/SH claims.
April 14, 2026	**Community Leadership:** Anse La Raye Development Committee (6 Members: 3 F, 3 M).	Anse La Raye; Evening Focus Session.	**Design Feedback:** Presented engineering alternatives. Residents demanded fixes for stagnant village drains and requested a local community skills mapping exercise for construction hiring. Agreed to a quarterly meeting schedule via WhatsApp/Google Drive.
January–June 2026 *(Ongoing)*	**Grassroots Communities:** 49 unique participants (26 Female, 16 Male in FGDs; 7 KIIs) representing fishers, seniors, and disabled residents.	Castries & Anse La Raye; 4 Focus Groups / 7 Interviews.	**Qualitative Research:** Captured lived flood experiences to build the Communication Strategy (COSAP). Logged strong community resistance to displacement and gathered insights from a wheelchair-bound resident on navigating flooded streets. It also noted a high level of consultation fatigue in Castries.
June 17, 2026	**Internal Project Oversight:** Project Steering Committee (PSC) Members.	Castries; Official Progress Review.	**Midterm Validation:** Reviewed deliverables from the completed Pre-Feasibility Study and assessed

			environmental/social milestone compliance.

Annex 12: Principles to Guide the Engagement Process

Stakeholder engagement is vital to all change-related processes, particularly in relation to projects that aim to generate long-term transformational change across different sectors of the society. General principles guiding the design and conduct of the engagement process under the SURF-In Project include:

(i) **Documented and formalised procedures**- all stakeholder engagements should be recorded and reported on;

(ii) **Context specific methodologies**- there is no pre-determined or "preferred approach" or method in the type and form of stakeholder engagement to be employed which will vary depending on the specific circumstances. In addition to sharing project information—such as objectives, components, environmental and social (E&S) requirements, and the status of ongoing consultancies and works—all engagements will provide participants with the opportunity to ask questions, share general feedback on their experience with the project, and raise project related grievances. The PCU will close the feedback loop by responding to stakeholder questions either immediately during the meeting or subsequently via email, telephone, or formal correspondence, depending on the nature of the query.; **The methods of consultation will also vary**, depending on the needs of the different stakeholder groups, and while multistakeholder engagements will be held when required, one -on-one engagements targeting specific groups and project affected persons will also be utlisied if and when the need arises. The various SH engagement methods will include workshops, large and small group meetings, focus group discussions, site visits, interviews (particularly with key informants and project affected persons) and surveys (including questionnaires delivered in person or online);

(iii) **Engagement is a process that must be supported and facilitated by adequate communication prior to, during and following specific events**. Participants must be provided with the information they need to contribute meaningfully (background to the issues, how they can/may contribute, expectations from other stakeholders, etc.). In most cases, information should be provided well in advance;

(iv) **In the design and execution of engagement processes, it is useful to make a distinction between "representation" and "representativeness**", i.e. it is important to ensure that the processes are representative of the main stakeholder categories, even if some are not formally represented (in other words, there is always a danger of giving a stronger voice to organised groups and sectors, at the expense of those that do not have a representative organisation);

(v) **Regardless of the purpose sought and the methods used, it is critical to ensure that the consultation process is equitable** and meaningful (see Section below);

(vi) **Engagement is not a one-off exercise,** it requires sustained dialogue and follow-up, including keeping stakeholders informed at the implementation stage of the project; and

(vii) **Effective and equitable engagement of stakeholders requires human, technical and financial resources;** therefore, the Project will ensure the availability of adequate budgetary allocation for undertaking stakeholder engagement activities.

SURF IN STAKEHOLDER ENGAGEMENT STRATEGY

The stakeholder engagement strategy for the Castries component of the Saint Lucia Urban Resilient Flood Investment Project (SURF-IN) establishes a framework for open dialogue, transparency, and collaboration with local communities, businesses, and government bodies throughout the project life cycle.

Project Summary

- Objective: Enhance urban flood resilience, upgrade stormwater management, and integrate nature-based solutions in Castries.
- Implementing Agency: Project Coordination Unit (PCU) under the Ministry of Finance, Economic Development and Youth Economy.
- Key Local Partner: Castries City Council (CCC).

Stakeholder Identification & Mapping

Stakeholder Group	Role / Interest	Influence Level	Engagement Method	Timing of Engagement
Business Owners Chamber of Commerce St. Lucia Small Business Association Business operators in CDC on Jeremie Street	Directly affected by civil works and flood risks; potential loss of revenue. Target for behaviour change.	High	Meetings Notices - Radio, television WhatsApp alerts Leaflets Poster Information booth Parapahernalia World Environment Day	Prior to engagement of design consultant During development of designs Prior to start of construction works During physical implementation
Residents Residents' Association	Directly affected by civil works and flood risks; inconvenience due to noise, traffic congestion, restricted access. Target for behaviour change.	High	Town hall meetings Notices - Radio, television Public service announcements WhatsApp alerts Posters Leaflets Information booth Parapahernalia World Environment Day	During development of designs Prior to start of construction works During physical implementation

Castries City Council (CCC)	Partner for community outreach. Responsible for maintenance of infrastructure Recipient of equipment	High	Meetings Participation in PSC meetings WhatsApp alerts Project updates GRM focal point	Throughout project implementation
MIPSE & National Agencies Also relevant for ALR	Co-manages drainage infrastructure. Responsible for road infrastructure	High	Meetings PSC representation Project updates GRM focal point	Throughout project implementation
Ministry of Planning Also relevant for ALR	Planning approvals	High	Meetings Project updates	Throughout implementation specifically during the design stage
Utility and Service Providers (WASCO, LUCELEC, FLOW) Also relevant	Coordination for the relocation of utilities	Medium	Meetings Project updates	During design stage, Throughout implementation
Vulnerable Populations Market Vendors Minibus drivers	Depend heavily on uninterrupted urban activity and vulnerable to flood loss. Target for behaviour change.	Medium	Meetings Public service announcements WhatsApp alerts Posters Information booth	During development of designs Prior to start of construction works During physical implementation
General Public	Directly affected by civil works and flood risks; inconvenience due to noise, traffic congestion, restricted access Target for behaviour change.	Medium	Town hall meetings Notices - Radio, television Public service announcements WhatsApp alerts Posters Leaflets	During development of designs Prior to start of construction works During physical implementation

Planned Engagement Methods & Channels

- Information Disclosure: Share non-technical summaries, environmental assessments, and construction schedules via the SURF-IN Project Portal, local radio, and community notice boards.
- Consultations: Hold focus group discussions, walk-throughs, and public town halls in flood-prone neighborhoods prior to civil works.

- Behavior Change Program: Implement community-led initiatives around solid waste management and drain de-siltation maintenance.

Grievance Redress Mechanism (GRM)

- Provide accessible feedback loops through designated site focal points, suggestion boxes, and online forms.

Informational Campaign Strategy

1.1. Key Messaging Framework

- **The "Why":** Explain how the SURF-IN project will directly reduce street flooding, protect merchandise, and improve safety in the downtown core.
- **The Scope:** Clearly outline what the project *will* do (e.g., specific drain upgrades, nature-based interventions) and what it *will not* do to manage community expectations.
- **The Timeline:** Provide an overarching roadmap of the planning, design, and upcoming phases so stakeholders know when more specific details (like traffic detours) will be shared.

1.2. **Tailored Information Delivery Channels**

- **For the Commercial Sector:**
    - **Digital Fact Sheets:** Distribute concise, downloadable PDFs via the St. Lucia Chamber of Commerce, Industry and Agriculture network.
    - **Liaison Visits:** Drop off brief info-packets directly to businesses along main corridors (e.g., Jeremie Street, Bridge Street).
- **For Mixed-Residential Areas:**
    - **Community Notice Boards:** Post highly visual, non-technical infographics at high-traffic hubs, church notice boards, and grocery stores.
    - **Informational Town Halls:** Host an open-door evening session at a central location such as the Town Hall focused purely on introducing the project team and the high-level roadmap.
- **For Market Vendors and Minibus drivers**
    - **Public Address (PA) / Radio Announcements:** Use local radio slots to share high-level project announcements, as many vendors rely on audio media during the workday.

Core Information Materials to Prepare

- **Frequently Asked Questions (FAQ) Sheet:** A simple, 1-page document addressing top-of-mind questions (e.g., *"Will my business have to close?"*, *"When does this start?"*).

- **Project Infographics:** Simple maps showing the general target zones of the Castries component without confusing technical engineering jargon.
- **Point of Contact Cards:** Small printouts or digital graphics showing the SURF-IN Project Portal link and official PCU contact channels for stakeholders who want to follow updates.

Actionable Engagement Channels & Strategies

- **Business & Resident Liaison Office:** Collaborate with the CCC to provide instant project updates and to act as a grievance reporting focal point.
- **Traffic & Access Advisory Notices:** Disseminate notices to local business groups and broadcast via local media prior to any major road or main drain excavation on high-traffic thoroughfares like Jeremie Street.

PROPOSED ENGAGEMENT SCHEDULE

Stakeholder / Group	Meeting Date and Time	Modality	Points for discussion
CCC	October 06 2026	In-person / virtual	Project overview and status updates E&S sensitisation GRM
Chamber of Commerce	October 08	Virtual	Project overview and status updates E&S sensitisation GRM
St. Lucia Small Business Association	October 08	Virtual	Project overview and status updates E&S sensitisation GRM
Vendors' Association	October 29	In-person	Project overview and status updates E&S sensitisation GRM
Mini bus Drivers' Association	November 05	Virtual	Project overview and status updates E&S sensitisation GRM
Resident's Association	November 18	Virtual / In-person	Project overview and status updates E&S sensitisation

			GRM