# Caribbean Renewable Energy Infrastructure Investment Facility (P180831)

## *Stakeholder Engagement Plan (SEP)*

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Government of Saint Lucia

Ministry of Infrastructure, Ports, Transport, Physical Development and Urban Renewal





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# ACRONYMS

| | |
|---|---|
| BESS | Battery energy storage system |
| CDB | Caribbean Development Bank |
| CERC | Contingency Emergency Response Component |
| CLO | Community Liaison Officer |
| ECCB | Eastern Caribbean Central Bank |
| ECCU | Eastern Caribbean Currency Union |
| E&S | Environmental and social |
| ESA | Electricity Supply Act |
| ESCP | Environmental and Social Commitment Plan |
| ESMF | Environmental and Social Management Framework |
| GDP | Gross Domestic Product |
| GEF | Global Environment Facility |
| GHG | Greenhouse gas |
| GRID | World Bank's agenda for Green, Resilient and Inclusive Development |
| IDA | International Development Association |
| IPF | Investment Project Financing |
| IPF DDO | Investment Project Financing with a Deferred Drawdown Option |
| IPP | independent power producers |
| IAEA | International Atomic Energy Agency |
| IRENA | International Renewable Energy Agency |
| LMP | Labor Management Procedures |
| LUCELEC | Saint Lucia Electricity Services Limited |
| MoF | Ministry of Finance |
| NDC | National Determined Contribution |
| NETS | National Energy Transition Strategy |
| NURC | National Utilities Regulatory Commission |
| OECS | Organisation of Eastern Caribbean States |
| PAP | Project-affected parties |
| PBC | Performance-based Conditions |
| PIU | Project implementation unit |
| PPP | Public private partnership |
| PSC | Project Steering Committee |
| RCU | Regional Coordination Unit |
| RE | Renewable Energy |
| REIIF | Renewable Energy Infrastructure Investment Facility |
| RSC | Regional Steering Committee |
| SEP | Stakeholder Engagement Plan |
| SLA | Service level agreements |
| SoP | Series of Projects |
| T&D | Transmission and distribution |
| USAID | United States Agency for International Development |
| USTDA | U.S. Trade and Development Agency |

# 1. INTRODUCTION AND PROJECT DESCRIPTION

## Regional and Country Context

The economies of the countries in the Caribbean region limit options for offsetting the high cost of dependence on imported fossil fuels**.** Countries of the region do not benefit from economic diversification, varied composition of international trade, and economies of scale that can help larger countries deal with high energy costs. Additionally, some countries in the Caribbean Region are highly vulnerable to extreme weather events and climate change, which has taken a massive toll on their economies in recent years. Located in the Atlantic hurricane belt, the region is exposed to recurrent extreme weather events such as hurricanes, floods, and rising sea levels as well as subject to substantial seismic activities and associated risks such as earthquakes and volcanic eruptions. Disasters due to severe weather are estimated to have cost the Eastern Caribbean countries an average of 3.6 percent of Gross Domestic Product (GDP) between 1997 and 2016, well above the average for small states.

Caribbean countries have already made substantial strides in regional integration to overcome shared challenges but much more is required to implement the regional clean-energy transition. While regional structures are in place to address common development problems of countries in the Organisation of Eastern Caribbean States (OECS), there are multiple barriers to developing the utility-scale RE projects necessary to reduce high dependence on costly imported fuel for diesel-fired power plants and meet targets for a clean-energy transition.

Caribbean countries are committed to establishing policies and regulatory frameworks to meet their National Determined Contribution (NDC) targets, but progress could be faster. IDA member countries in the OECS remain committed to their NDC targets, with a long-term strategy towards a clean energy transition. Grenada submitted its second NDC in November 2020, targeting a reduction of greenhouse gas (GHG) emissions at 40 percent of the 2010 level by 2030. Grenada in in the process of updating its national energy policies and implementation action plans and developed its National Green Cooling Strategies in 2020. However, despite these plans, results in reducing GHG have been insignificant in the Caribbean Region so far due to: (i) the lack of consistent and effective implementation by the government agencies, (ii) regulatory frameworks not yet fully functional in support of the clean-energy transition, and (iii) inadequate financial incentives as well as integration capacity of national utilities to support new RE investments.

**The Caribbean Resilient Renewable Energy Infrastructure Investment Facility (RREIIF)** Project provides countries access to regional IDA to address funding needs for more renewable energy integration investment in their grids. The regional support will allow these countries to address their barriers related to scale and leverage regional IDA support, and it will ensure that national IDA will be focused on the immediate needs of these countries in terms of social sectors and disaster management. The proposed RREIIF Project is designed for the countries in the Caribbean region to address shared and interlinked challenges in their energy sector and accelerate the decarbonization of the energy sector by mobilizing public and private sector financing for utility-scale RE projects.

The RREIFF Project is designed as a regional program with a goal of creating an enabling environment for renewable energy and attracting major companies and investors into small island nations**.** This will encourage the development of interest and momentum in the countries to implement the necessary

policies and infrastructure to fully benefit from regional developments. RREIIF's approach of aggregating capacity needs across member countries will create a significant enough demand for leading private players interested in deploying renewable energy projects in these countries.

## Project Description, Development Objective, and Components

**The Caribbean Resilient Renewable Energy Infrastructure Investment Facility (RREIIF) Project** (hereafter referred to as the Project) is a regional Series of Projects (SoP) to create an enabling environment for renewable energy and attract major companies and investors into smaller island-countries. The SoP's programmatic framework is scalable, allowing countries in the region to join at different times. A regional approach will create interests and momentum in project countries to put in place the right policy and enabling infrastructure to take full advantage of regional developments. The Project's approach of aggregating capacity needs across countries will provide a large enough demand for leading private players to be interested in deploying solar energy in these countries. The first set of activities in the Project will be implemented at the regional level through a Regional Entity within the Eastern Caribbean Partial Guarantee Corporation (ECPCGC) and at the national level in Grenada, Saint Lucia, and Saint Vincent and the Grenadines.

The Project Development Objective is to increase the share of utility-scale renewable energy generation and private-sector participation in renewable energy development in the participating Caribbean countries.

The Project consists of 4 components that aim to address common regional barriers to RE development in the Caribbean countries. Across all components, measures to strengthen resilience have been integrated given the vulnerability of these countries to climate and natural disaster risks.

**Component 1: Regional RE Coordination Unit (RCU), Institutional Strengthening, and Implementation Support.** This component will establish the regional entity for: (i) coordinating the aggregation of RE projects to achieve economies of scale, lowering the cost of individual projects, and (ii) providing technical support to national entities of the three participating countries, as well as to the Eastern Caribbean Partial Credit Guarantee Corporation (ECPCGC).

**Subcomponent 1.1: The RCU and the Institutional Strengthening Mechanism (US$2.00 million).** In line with the ECCU's Monetary Council's decision (dated October 18, 2024), the RCU will we be responsible for the aggregation of RE projects across the participating countries along with national regulators. The RCU will assist national PIUs in identifying and preparing bankable RE projects and be responsible for coordinating their development, from conception to completion, regularly reporting on progress. Climate resilient considerations will be embedded in the appraisal of these projects. The RCU's operating costs to ensure that it is sustainable after the conclusion of support from the World Bank.

**Subcomponent 1.2: Technical Assistance (USD 5.50 million)**. This subcomponent will provide technical support to the regional and national stakeholders of the three participating countries, in the following areas: capacity-building, standardization of documentation, advisory services, technical assistance to ECPCGC, support for hiring specialized staff, coordination with and capacity building for participating banks and assistance in the development of an insurance product. Furthermore, the TA activities will support the ECCB in the design and establishment of an umbrella fund for mobilizing climate finance to support the regional green-energy transition.

**Component 2: Risk Mitigation Mechanism: Equity Capital in the RREIIF Risk Mitigation Fund for Partial Credit Guarantees (Estimated Cost: USD30.00 million).** The RREIIF will provide risk mitigation solutions for participating banks in the region via a new RE window with multiple product offerings, e.g. partial credit guarantee (PCG), implemented by the Eastern Caribbean Partial Credit Guarantee Corporation (ECPCGC). This component will also address physical risks by supporting RE projects that have resilient design.

**Component 3: Renewable Energy Integration and Infrastructure Modernization, Institutional Strengthening, and National Implementation Support (Estimated Cost: US 81.24 million)**. This component focuses on modernizing electricity grids to support the integration of RE sources and enhance the reliability and resilience of energy infrastructure. It will finance the optimization and strengthening of transmission and distribution (T&D) networks in participating countries, preparing the grid to accommodate increased RE generation, including battery energy storage. The investment will cover works to expand the capacity of existing sub transmission lines, upgrade current substations, or establish new primary substations. All infrastructure design and construction will incorporate climate-resilient measures to enhance the grid's durability against climate hazards.

> **Subcomponent 3.2: Procurement, installation of T&D lines, upgrade of substations and modernization of Control Centers in Saint Lucia**. This subcomponent will finance the supply and installation of (i) transmission and distribution network reinforcement to integrate more capacity in the grid, (ii) upgrading substations by increasing their capacity and or optimizing the voltage level, (iii) modernizing existing distribution or transmission control centers and or creating new ones as needed. Specifically, the component will finance (i) replacement of 66kV Gas Insulated Substation (GIS) at Castries; (ii) construction of new transmission line from Cul de Sac to Castries; and (ii) construction of new substation in the north of the island.
>
> (Subcomponent 3.1 and 3.3 of the Project provides similar support to Grenada and Saint Vincent and the Grenadines respectively.)

**Sub-Component 3.4: Institutional strengthening and Implementation Support to National PIUs (US$9.15 million):** The subcomponent will focus on supporting the national PIUs in the implementation of the project. Each country's PIU will be responsible for managing its subcomponent. This subcomponent will help countries in the procurement of supervisory engineers, consultancy services, and the preparation of any E&S instruments that might be required; it will also help countries fund PIU staff and operations. Each country's PIU will have designated funds based on support activities that need to be carried out. The allocation across countries for this sub-component is: US$3.15 Million for Saint Lucia (Sub-component 3.4(i))[1]; US$3 Million for Grenada (Sub-component 3.4(ii)); US$3 Million for SVG (Sub-component 3.4(iii)).

**Component 4: Contingent Emergency Response Component (US$0).** This component, known as the Contingent Emergency Response Component (CERC), will be available if needed, to redeploy some of the project resources alongside those of other projects in specific country project portfolio to respond to an emergency. The available resources will be made available to finance emergency response activities and to address crisis and emergency needs. The activities to be financed will be assessed to ensure Paris Alignment. An Immediate Response Mechanism Coordinating Agency and expenditure management procedures will be defined in an Immediate Response Mechanism Operational Manual, to be prepared

[1] This includes US$0.15 million financing from the CCEFCF allocation for Gender Equality for SIDs (GE-SIDS) for Saint Lucia aimed at increasing female employment in technical energy jobs and bolstering Saint Lucia's STEM capacity to support the country's transition to a decarbonized energy sector.

separately and approved by the World Bank, in line with guidance provided under OP 10.00, paragraph 12. In case this component is used, the project will be restructured to allocate financing, revise the PDO and indicators, and detail implementation arrangements.

**Project Cost and Financing:** The lending instrument for the proposed project is Investment Project Financing (IPF). The total project cost is estimated at US$118.74 million.

The Project is being prepared under the World Bank's Environment and Social Framework (ESF). As per the Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure, Grenada's PIU has prepared this Stakeholder Engagement Plan (SEP). This SEP should be read together with other plans prepared for the Project, including the Environmental and Social Management Framework (ESMF), the Labor Management Procedures (LMP) and the Environmental and Social Commitment Plan (ESCP). (An earlier version of this SEP was publicly disclosed for consultation.)

# 2. STAKEHOLDER IDENTIFICATION AND ANALYSIS

## Objective

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The scope and level of detail of the SEP should be commensurate with and proportionate to the nature and scale, potential risks, and impacts of the project and the concerns of the stakeholders who may be affected by or are interested in the project. This SEP is a strategic communication plan that outlines a step-by-step process on how the Project team will communicate with their stakeholders to increase the likelihood of positive project outcomes.

## Methodology

Through the activities outlined in this SEP, the Project will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation. This SEP is a living document that will be revised as needed and throughout the project cycle based on feedback from project stakeholders. This SEP will be implemented through the following activities:

- Public consultations, such as community meetings, information sessions and focus group meetings
- A grievance mechanism
- Public awareness campaigns

Public consultations are an important step to identify and evaluate the project's environmental and social risks and impacts. These consultations aim to:

- Disclose information on the project and the results of the environmental and social aspects.
- Assess the level of risk as perceived by stakeholders.
- Identify challenges and limitations.

For the purposes of effective and tailored engagement, stakeholders of the project have been identified and are divided into the following core categories: project-affected parties, other interested parties, and disadvantaged/vulnerable groups.

### Project-Affected Parties

Project-affected parties (PAPs) include persons, groups, and other entities within the Project's area of influence that are directly influenced (actually or potentially) by the Project and/or have been identified as most susceptible to change associated with the Project. They need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. Under the Project, PAPs include a wide range of individuals and organizations that will be engaged throughout the project cycle.

Direct beneficiaries will be the **electricity consumers and citizens** with greater access to affordable, reliable, resilient, and clean electricity and other social and economic infrastructure. Transitioning away from fossil fuel electricity generation is critical not only to boost long-term growth but also to ensure that households – particularly those that are low-income and vulnerable – can access affordable clean energy through reliable access to electricity.

Given the particular focus on renewable energy, it is expected that the consumers would benefit from enhanced security against power outages through BESS systems that address the intermittent nature of solar power. This will be especially beneficial for any **critical infrastructure such as health centers, water supply, transport**. The new renewable energy additions facilitated by the REIIF offer a cleaner and more affordable alternative to existing fuel-based generation, making the grid more reliable and resilient in the face of fluctuating oil prices and climate hazards. Residents will also benefit from cleaner environment and reduced air pollution from lower fossil fuel combustion in power plants.

The Project's direct beneficiaries will also be **national governments** as they will benefit from reduced import bills linked with fossil fuel imports for electricity generation that will reduce the national fiscal burden. The Project will also help reduce the pressure on foreign exchange reserves that the ECCB may need to maintain for fossil fuel imports. Additionally, mobilization of private capital for investments in renewable energy will also reduce fiscal pressure on public finance.

The Project beneficiaries will also be the **private firms and labor force** involved in supply, construction, and operation of RE infrastructure projects. By financing transformational, gender-informed, and poverty focused infrastructure interventions in the region, the REIIF will directly create jobs and other income-generating opportunities. This should directly contribute to increased consumption of selected low-income and vulnerable groups, particularly young people who experience low labor rate participation rates and precarious employment.

**Private firms** in countries will benefit from REIIF's long-term risk mitigation, and through technology transfers and know-how, which is an indicator that is being tracked by ECCB and countries to measure the impact of the Project's intervention.

The **ECCB, the governments, national utilities, and regulator** will directly benefit from the REIIF's interventions. The facility will be able to mobilize greater amounts of investment from private developers to boost the development of utility scale renewable energy in member countries. Similarly, participating countries (Ministries, national utilities, and regulators) and the RCU in the ECCB will benefit from the institutional strengthening activities envisioned under Component 1 and Component 3, thereby enhancing their ability to support infrastructure finance in the region.

**Youth and women** will benefit from support activities included in the Project**.** The capacity building activities under Component 3 will help improve women and youth employability in the energy sector's technical jobs. These jobs could be across the energy sector, including within the utility, private sector companies, or the public sector.

### Other Interested Parties

The projects' stakeholders also include 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 implementation in some way. The following stakeholders under this category will also be included in the stakeholder engagement activities:

- NGOs and civil society groups, especially those working on climate change, environment, energy efficiency and consumer rights
- Consumer's Association that represents electricity users
- The Employers Federation
- Local government entities and other community leaders that represent the local communities/PAPs, to protect the rights of inhabitants in the project area and to receive and address any project-related feedback and grievances from them
- Private sector entities that would be interested in procurement and supply chain issues related to the Project as well in supporting the transition to EE/RE technologies within key sectors and at the household level
- Development partners such as the Global Environment Facility (GEF), Pan American Health Organization/World Health Organization, U.S. Trade and Development Agency (USTDA), United States Agency for International Development (USAID), Caribbean Development Bank (CDB), Abu Dhabi Fund for Development, the International Renewable Energy Agency (IRENA) and the International Atomic Energy Agency (IAEA) that currently have projects in the sector
- Education sector entities such as Sir Arthur Lewis Community College
- Mass media outlets, to inform residents in the Project area and the wider public about planned Project activities
- The general public, to inform them of the general socio-economic impacts of the project
- Internal stakeholders include project staff; supervision consultants; contractors; sub-contractors; service providers, suppliers, and their workers.

### Disadvantaged/vulnerable individuals and groups

Disadvantaged/vulnerable individuals and groups are potentially disproportionally affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project and its environmental and social impacts and mitigation strategies. These stakeholders may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the Project. Vulnerable groups within the communities affected by the Project will be further confirmed and consulted through dedicated means, as appropriate.

Within the Project, the vulnerable or disadvantaged groups may include but are not limited to the following:

- **Low income and vulnerable households:** These communities will benefit from Project activities by improving access to more reliable, affordable, and cleaner energy.

- **Youth and women:** Capacity building activities will improve women and youth employability in the energy sector's technical jobs.
- Communities affected by **land acquisition or economic displacement** from Project activities could also potentially be included in this category of stakeholders.

Description of the methods of engagement that will be undertaken by the project is provided in the following section. Table 2 details these three categories of stakeholders.

***Table 1 Project Stakeholder Disaggregation***

<table>
<tr><th>Category of Activity</th><th>Project Affected Parties</th><th>Other Interested Parties</th><th>Disadvantaged/ Vulnerable Groups/individuals</th></tr>
<tr><td>General and Cross-cutting Stakeholders</td><td>• National Utilities Regulatory Commission (NURC)<br>• Saint Lucia Electricity Services Ltd (LUCELEC)</td><td rowspan="6">(External)<br>• General public<br>• Ministries and Government agencies<br>• Local government entities<br>• Media<br>• Private Sector<br>• NGOs /Civil Society<br>• Funding agencies<br><br>(Internal)<br>• Project Staff<br>• Supervision Consultants Contractors<br>• Sub-contractors<br>• Service providers, suppliers, and their workers</td><td rowspan="6">• Low income and vulnerable households<br>• Youth and women<br>• Potential stakeholders impacted by land acquisition and/or economic displacement</td></tr>
<tr><td colspan="2">Component 3: Renewable Energy Integration and Infrastructure Modernization, Institutional Strengthening, and National Implementation Support (Tentative list of sub-projects)</td></tr>
<tr><td>Replacement of Castries Substation 66kV GIS</td><td rowspan="3">• Stakeholders impacted by land acquisition and/or economic displacement<br>• Landowners from whom land would be potentially purchased, through private treaty<br>• Residents living along roadway where works will take place<br>• Drivers using the roadway where works will take place<br>• City Councils<br>• Bus Drivers Association<br>• Transportation commission<br>• Police Authority<br>• Saint Lucia Solid Waste Management Authority (SLSWMA)</td></tr>
<tr><td>Construction of new transmission line Cul de Sac to Castries</td></tr>
<tr><td>Construction of a new substation</td></tr>
<tr><td colspan="2">Component 5: Contingent Emergency Response Component</td></tr>
<tr><td>Emergency Response Activities</td><td>• National Emergency Management Organization (NEMO)</td></tr>
</table>

# 3. STAKEHOLDER ENGAGEMENT ACTIVITIES

The project will utilize a variety of stakeholder-specific mediums in the stakeholder engagement process such as national-level public consultations, focus groups and information disclosure throughout design, implementation, and operational phases of the project.

### Stakeholder Engagement During Project Preparation

The objectives of the stakeholders' consultations during project preparation are as follows:

- To inform stakeholders of the proposed Project
- To garner stakeholders' input on the Project's design and activities

- To identify or clarify project-affected persons, other interested parties, and disadvantaged/vulnerable groups
- To foster broad based ownership of Project and its outcomes

Between September 16 to October 3, 2024; the Ministry of Infrastructure, Port, Transport, Physical Development and Urban Renewable (MIPTPDUR) conducted a series of public consultations around Saint Lucia's new Energy Supply Services Bill in various communities (Gros Islet, Soufriere, Dennery, Micoud, and Vieux Fort). During these consultations, the Project was also presented to stakeholders. A dedicated consultation was held with private sector stakeholders on September 20, 2024. (Annex 1 provides more details.)

A series of consultations specific to the Project will take place once project activities are well-defined and the project is effective. During these consultations, the Project will be presented to gather feedback on the Project's objectives and activities, the grievance management process, and potential impacts and risks related to the proposed Project activities. These consultations serve as an opportunity to gather feedback on other potential impacts and risks not yet identified in the disclosed Environmental and Social Management Framework (ESMF) and Labour Management Procedures (LMPs). (The ESMF and LMP will be disclosed via the Project's website.) This feedback will be recorded and considered by Project staff and a summary of the main recommendations received and to be integrated into the next iteration of the SEP.

### Summary of methods, tools, and techniques for stakeholder engagement

The stakeholder engagement activities under the Project have two objectives: information disclosure on the Project activities and gathering feedback from stakeholders to support the objectives of the Project. To this end, the proposed engagement activities employ a range of formats, depending on the activity objective and the needs of stakeholders. These include formal, in-person meetings with government counterparts, site-level consultations at sub-project sites, focus group meetings, and site visits/walk-throughs during and after implementation.

### Stakeholder engagement program

Table 3 outlines the timeline of stakeholder activities that will take place under the Project.

***Table 2 Stakeholder Engagement Activities***

| **Timeline** (Project stage) | **Topics** | **Methods Used** (Objective: Information disclosure, Feedback, Behavior Change) | **Target stakeholders** | **Responsibilities** |
|---|---|---|---|---|
| Prior to commencement of project activities<br><br>(Preparation) | Project Objectives/ Activities<br><br>Stakeholder Engagement Plan<br><br>Grievance Management Mechanism | Information will be disclosed, and feedback gathered via:<br>- Face-to-face meetings and presentations, including a national-level public consultation<br>- Email communication<br>- The Project's website and social media | PAPs such as LUCELEC, NURC, private sector entities, City Councils, Bus Drivers Association, and cross-sections of energy consumers<br><br>Stakeholders impacted by land acquisition and/or | PIU Social and Environmental Specialists, Community Liaison Officer (CLO), Communications Officer |

| **Timeline** (Project stage) | **Topics** | **Methods Used** (Objective: Information disclosure, Feedback, Behavior Change) | **Target stakeholders** | **Responsibilities** |
|---|---|---|---|---|
| | Environmental and Social Management Framework (ESMF)<br><br>Labor Management Procedure/Grievance Mechanism for workers | | economic displacement<br><br>OIPs such as Consumer's Association that represent electricity users to provide feedback on SEP and GRM; the Employers Federation to provide feedback on the LMP, and National Environmental Groups and relevant government agencies to provide feedback on the ESMF | |
| Prior to start of civil works and especially during construction activities<br><br>Monthly<br><br>(Implementation) | Environmental and Social Management Framework and any possible plans that may be applied to the sub-project works<br>ESMPs, Resettlement Action Plans, Cultural Heritage Plan, etc.<br><br>Stakeholder engagement activities<br><br>Grievance Management Mechanism | Prior to the start of civil works:<br>- On-site interviews and walk-throughs with stakeholders<br>- Informational meetings for neighboring communities on sub-project works<br><br>(Annex 2 provides guidance on site-specific consultations)<br><br>Information will be disseminated via:<br>- The project's website<br>- The project's social media<br>- Mass media content (News stories/TV/radio programs on EE/RE)<br>- Community bulletin boards<br>- Posters<br><br>Feedback will be collected through:<br>- The PIU staff<br>- Site-level consultations<br>- Grievance Mechanism<br>- Project Social Media<br>- Contractors on the sub-project site | PAPs, including neighboring residents, and businesses, NGO/Civil society groups<br><br>Stakeholders impacted by land acquisition and/or economic displacement<br><br>General Public<br><br>Other interested parties, such as:<br>(Internal) Supervision Consultants, Contractors, Sub-contractors<br><br>(External) Ministries and Government agencies, Local government entities, Media, Private Sector, Development Partners | PIU Social and Environmental Specialists, Community Liaison Officer (CLO), Communications Officer |
| Post-construction phase<br>Quarterly information disclosure, feedback, | Project Impacts<br><br>Grievance Management Mechanism | Information will be disseminated via:<br>- The project's website<br>- The project's social media<br><br>Feedback will be collected through:<br>- Focus groups with cross-sections of energy consumers | PAPs, including site-specific groups and communities<br><br>General Public | PIU Social and Environmental Specialists, Community Liaison Officer (CLO), |

| Timeline (Project stage) | Topics | Methods Used (Objective: Information disclosure, Feedback, Behavior Change) | Target stakeholders | Responsibilities |
|---|---|---|---|---|
| behavior change activities (Implementation) | | | Ministries and Government agencies, Local government entities, Media, Private Sector, Development Partners | Communications Officer |

## Strategy to Incorporate the Views of Vulnerable Groups

The Project will include targeted stakeholder engagement with vulnerable groups. The strategies that will be adopted to effectively engage and communicate to these vulnerable group will be considered during project implementation. Outreach activities will ensure that these groups are engaged in a manner that is appropriate to their needs. Examples include gender-balanced community engagement teams; provisions for childcare, transport, and safety; online and in-person engagement activities so that stakeholders in unpaid care work can participate; communication materials and meeting formats that are child friendly or appropriate for those that are physically or visually impaired.

## Reporting Back to Stakeholders

Stakeholders will be kept informed as the Project develops, including reporting on the Project's environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism, and on the Project's overall implementation progress. Potential means for reporting back to stakeholders include via:

- The Project's Social and Environmental Specialists (via the Project website, meetings, etc.)
- During site-level meetings
- Theme-based social media
- National Radio stations (such as Hot FM, RCI and Helen 100)
- Mass media channels – news stories, press releases and radio programs

## Data Privacy

Personal data, personally identifiable information and sensitive data are likely to be collected and used by the Project in connection with the management of environmental and social risks under circumstances where measures to ensure the legitimate, appropriate, and proportionate use and processing of that data may not feature in national law or data governance regulations. Personal data is expected to be collected and processed[2] in the following ways:

- Stakeholder identification and consultations
- Investigation of incidents and accidents related to project activities through grievance management
- Complaints raised by individuals at the project level.

[2] Personal data processing is any operation or set of operations, automated or not, which is performed on personal data, including but not limited to collection, storage, use, transmission, disclosure, or deletion.

To guard against abuse of that data, the Project will incorporate best international practices for dealing with such data in such circumstances. Such measures may include, by way of example, data minimization (collecting only data that is necessary for the purpose); data accuracy (correct or erase data that are not necessary or are inaccurate); use limitations (data are only used for legitimate and related purposes); data retention (retain data only for as long as they are necessary); informing data subjects of use and processing of data; and allowing data subjects the opportunity to correct information about them, etc. In practical terms, the Project will ensure that these principles apply through assessments of existing or development of new data governance mechanisms and data standards for processing personal data in connection with parties involved in Project implementation (project implementation units, contractors, consultancy firms, etc.), including assessment or development of data sharing protocols, rules or regulations, revision of relevant regulations, and training on personal data protection.

# 4. BUDGET AND IMPLEMENTATION OF STAKEHOLDER ENGAGEMENT ACTIVITIES

## SEP Budget

A tentative budget for implementing the stakeholder engagement plan over four years is detailed in Table 3. The PIU will review this plan every six months to determine if any changes to stakeholder classification or engagement are required. The plan and budget will be updated accordingly, and a new revision will be distributed. The budget for the SEP is included in component 3 of the project.

***Table 3 Budget for SEP****

| STAKEHOLDER ENGAGEMENT ACTIVITIES | TOTAL COST (USD) | REMARKS |
|---|---|---|
| *Training on social/environmental issues for PIU and contractor staff* | 8,000 | |
| *Contingency (10%)* | 800 | |
| | **8,800** | |
| **National Consultations** *(Venue, Catering, materials, travel)* | 24,000 | Consultations before project works begin, 1 during, 1 after completion |
| **Community/Stakeholder Meetings** *(Catering, materials, travel)* | 30,000 | Site-level meetings (before project works begin, 1 during, 1 after completion) Meetings with vulnerable groups (organized as needed) |
| **Communications Materials** (*TV/Radio content, advertisements, Print Materials, Site-based posters/banners/notice boards, Project Paraphernalia, etc.)* | 30,000 | Overall budget for communications materials |
| *Contingency (10%)* | 8,400 | |
| | **92,400** | |
| *Internal GR training for staff and contractors, (transport, catering, materials)* | **4,000** | Led by GRM Focal point and CLO |
| *Contingency (10%)* | **400** | |
| | **4.400** | |
| | **105,600** | |

*The budget detailed here is tentative and likely to change once the stakeholder engagement activities are further defined.
**Costs for the Environmental Specialist salary, the Social Specialist salary, the CLO, the services of a Communications Firm, and other travel and meeting costs are included in the overall Project budget

### Project Implementation Arrangements

The Project will set up and chair the **Regional Steering Committee (RSC)** which will include senior representatives of the governments of each participating country and will oversee Project implementation, provide strategic guidance, and facilitate decision-making on substantive Project matters. The RSC will approve annual work plans, facilitate collaboration, and meet at least annually to assess implementation progress.

**The Regional Renewable Energy Coordinating Unit (RCU**), hosted as an independent entity within the Regional Entity and under the strategic guidance of the RSC will coordinate the overall Project implementation, carry out activities under Components 1 and 2 and support national-level Project implementation units (PIUs) in executing Components 3, 4 and 5. The RCU will support national PIUs in identifying a pipeline of high-priority, utility-scale RE projects and aid in the preparation of these projects via feasibility studies and other assistance to ensure their readiness for an internationally competitive bidding process.

The RCU will have fiduciary responsibility for implementing Components 1 and 2. The RCU will be acting as transaction advisors to the countries, and will be responsible for overall quality assurance, coordination, and reporting for the Project to the RSC and World Bank. The RCU will lead the aggregated procurement activities on the regional level. As such, the RCU will sign individual Service Level Agreements (SLAs) with each PIU that will define their roles and responsibilities with respect to each other. The SLA will clearly outline the tasks that the RCU is expected to perform for the national PIUs specifically pertaining to centralized procurement. The SLA will also specify how the country's designated energy sector procurement authority (e.g., the regulatory authority), will assign procurement responsibilities to the RCU, as needed.

The RCU will specifically execute Component 1 activities: including project development, aggregation, tender processes for solar developers and BESS investments. Throughout all stages of project implementation, the RCU will provide technical assistance and capacity building to all stakeholders involved in the procurement process, particularly national energy ministries, regulatory authorities, and utilities. The RCU will consist of a Project Coordinator, two Renewable Energy Specialists with project financing knowledge, a T&D Specialist with BESS knowledge, a Procurement Specialist, a Financial Management Specialist, a Legal Specialist, an Environmental Specialist, a Social/Gender Specialist and support staff. The RCU will also act as secretariat of the RSC.

**National PIU in Saint Lucia**: The existing PIU under the Ministry of Infrastructure, Port, Transport, Physical Development and Urban Renewable (MIPTPDUR) will be leveraged with additional professional experts for the implementation of the project activities. For the project, a Project coordinator, an expert in transmission and distribution planning and renewable energy, and shared experts across other energy sector projects -- an environmental specialist, a social specialist, a community liaison officer, a financial management assistant, and procurement assistant will be hired as needed. A PSC under the supervision of the Ministry in charge of the energy sector will be established which will include representatives of MOF, National Utilities Regulatory Commission, and other relevant agencies. The PSC will coordinate and oversee the project activities at country level.

At the national level, a **Project Steering Committee (PSC)** under the supervision of the Ministry will be established and will include representatives of the MoF, National Utilities Regulatory Commission, and

other government stakeholders. The PSC will coordinate and oversee the project activities at national level.

A Grievance Management Committee will address complicated complaints, as needed (See Section 5). The stakeholder engagement activities will be documented through a Project-specific website, a grievance/feedback database, and a stakeholder engagement log.

# 5. GRIEVANCE MECHANISM

### Objectives of the Grievance Mechanism

Saint Lucia and the WB are committed to enhancing opportunities for grievance management, collaborative problem solving, and alternative dispute resolution for the Project. The Project and its associated activities may have some short term and reversible impacts. The Grievance Mechanism is a tool for early identification, assessment, and resolution of complaints regarding any anticipated and unanticipated risks that would be encountered during implementation as well as for receiving feedback to inform project activities. The Grievance Mechanism aims to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved.

### Implementation structure

The implementation structure for the Grievance Mechanism is the following:

- **PIU level:** the Social Specialist will be the project's Grievance Coordinator. With the support of the CLOs, the Grievance Coordinator will receive and examine grievances/feedback at the PIU level, maintain a project-wide database of filed grievances and their redressal process, monitor the project activities of contractors and consultants on management of grievances, and prepare quarterly progress reports on grievances received.
- **The Grievance Management Committee:** The Grievance Management Committee is chaired by the PIU head and composed of the Grievance Coordinator, the Environment Specialist, a representative from LUCELEC, and a representative from the National Utilities Regulatory Commission. The Committee will review complicated grievances that cannot be resolved through the Grievance Coordinator. Others will be included in Committee meetings as needed and depending on the nature of the complaint.
- **Sub-project site level:** The relevant CLO will receive and record grievances from stakeholders. Once received, the grievance is relayed to the Grievance Coordinator within the PIU.
- **Contractor level:** Contractors will designate a person to receive, record and investigate grievances. Once received, the grievance is relayed to the Grievance Coordinator within the PIU.

### The Grievance Redress Process

The process for grievance management is as follows:

1. **Receive grievance/feedback**: All grievances/feedback can be received by the PIU staff, sub-project site focal points or by any other person on a sub-project, including a contractor or other designated person. Through the consultation process, stakeholders will be informed of various avenues through which grievances/feedback can be filed, including at the sub-project level (suggestion/grievance boxes will be available in each building during construction works) or directly to the PIU. At the contactor/subcontractor level, the Environmental and Social Management Plans (ESMPs) will reflect

site specific channels and contact point of entry for grievances. The points of receipt of grievances/feedback are detailed in Table 5.

2. **Processing**: Within 24 hours of receipt, the Grievance Coordinator will categorize the grievance (high, medium, low priority) and forward grievances/feedback to relevant persons at the sub-project level or within the PIU.
3. **Acknowledgement of grievance***:* All grievances will be acknowledged by telephone or in writing by the Grievance Coordinator within 24 hours of receipt of the grievance. The grievant should be informed of the approximate timeline for addressing the complaint if it cannot be addressed immediately.
4. **Verification, investigation, action:** The Grievance Coordinator will investigate the complaint. This investigation will include, but is not limited to, meetings with the grievant, site visits, meetings/interviews with project staff and collection of relevant documentation and other forms of evidence. For meetings, the deliberations and decision will be recorded on a Meeting Record Form. Community representatives or representatives of the grievant will be allowed to sit in at these meetings. The Grievance Coordinator will work with the relevant authorities and with project contractors to ensure speedy resolution of grievances. If the complaint cannot be resolved by the Grievance Coordinator, it will be reviewed by the Grievance Management Committee.
5. **Monitoring and evaluation:** Data on complaints will be collected in the Grievance Management Registration and Monitoring Sheet and reported to the NCC and WB on a quarterly basis.
6. **Provision of feedback:** Feedback from grievant regarding their satisfaction with complaint resolution is collected within a month after the grievance is resolved.

***Table 4 Grievance Redress Management Process***

| Step | Description of Grievance Management Process | Responsible Entity | Time Frame |
|---|---|---|---|
| 1. Receiving Grievance/Feedback | PIU level, Saint Lucia's Ministry of Infrastructure, Ports, Transport, Physical Development and Urban Renewal<br>Union Complex, Union, Castries<br>Tel: (758) 468-4300<br><br>Intake channels: In-person, in writing, Project site, telephone, fax, emails, SMS, Whatsapp, Facebook page, Grievance submission form | Grievance Coordinator | Ongoing and available to project stakeholders during all stages of project |
| | Sub-project site level<br><br>Intake channels: in person, in writing, telephone, SMS, Whatsapp, suggestion/grievance box | Designated CLO | |
| | Contractor<br><br>Intake channels: grievants may file a complaint at a sub-project site via a suggestion/grievance box or in-person in writing, telephone, SMS, or Whatsapp with the contractor | Contractor-Designated Grievance Manager | |
| **2.** Processing | Any complaint received is categorized (high, medium, low priority) and forwarded to relevant sub-project focal points or PIU. Then the grievance is logged in the Grievance Management Registration and Monitoring Sheet | Grievance Coordinator | Within 24 hours of receipt |
| **3.** Acknowledgement | Receipt of the grievance is acknowledged to the grievant and informed of the approximate timeline for addressing the complaint if it can't be addressed immediately. | Grievance Coordinator | Within 24 hours of receipt |

| | | | | |
|---|---|---|---|---|
| **4.** | Verification, investigation, action | Investigation of the complaint is led by the Grievance Coordinator (and if needed, the Grievance Management Committee) and a proposed resolution is formulated and communicated to the grievant | Grievance Coordinator in collaboration with relevant Ministries, and Grievance Management Committee (for complex cases) | No later than 30 working days |
| **5.** | Monitoring and evaluation | Data on complaints are collected in the Grievance Management Registration and Monitoring Sheet and reported to the NCC and WB | GRM Focal point | Quarterly reporting |
| **6.** | Provision of feedback | Feedback from grievant regarding satisfaction with complaint resolution is collected | GRM Focal Point | Within 1 month after resolution |

Meetings with the grievant will be recorded and decisions will be communicated to the grievant formally. If she/he accepts the resolutions, the grievant's acceptance will be obtained on the disclosure format in Annex 5. It is expected that the complaint will be resolved at this level no later than 30 working days of receipt of the original complaint. If the affected party does not agree with the resolution by the Grievance Management process, or there is a time delay of more than 60 working days in resolving the issue, the grievant can opt to consider taking legal recourse within the local courts.

# 6. MONITORING AND REPORTING

### Monitoring Stakeholder Engagement

A number of key performance indicators will also be monitored by the project on a regular basis, including the following parameters:

**General:**

- The number of consultation meetings and public discussions conducted quarterly

**Information Dissemination:**

- The number of national broadcasts related to the Project (such as notices, radio and tv talk shows)
- The number of WhatsApp and social media groups engaged

**Feedback Gathering:**

- The number of recommendations gathered in consultations during Project implementation
- The number of recommendations that were integrated into the Project design
- The number of participants in site-level meetings

**Grievance Management:**

- The numbers and types of grievances received within a quarterly period
- Percentage of grievants by gender
- The number of grievances resolved within the prescribed timeline

### Reporting on Stakeholder Engagement

The SEP will be periodically revised and updated as necessary during project implementation. Quarterly summaries on stakeholder engagement activities and reports on public suggestions and grievances,

together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project.

The quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year will be conveyed to stakeholders through publication of a standalone annual report.

# ANNEX 1: CONSULTATION QUESTIONS/COMMENTS/RECOMMENDATIONS

Between September 16 to October 3, 2024; the Ministry of Infrastructure, Port, Transport, Physical Development and Urban Renewable (MIPTPDUR) presented the RREIIF project in consultations with communities. These consultations were around Saint Lucia's new Energy Supply Services Bill, but the project team also presented the RREIIF project to community stakeholders. A dedicated consultation was also held with private sector stakeholders on September 20, 2024. The summary of these consultations is below.

**Summary of Stakeholder Consultation on RREIIF**

1. **Executive Summary**
   - **Purpose of the Report**: Provide a concise summary of the stakeholder consultation process on the Renewable Energy Infrastructure, Investment Facility (REIIF) project, including its objectives and outcomes.
   - **Key Highlights**: Consultations were held from September 16th to October 3rd in the communities of Castries, Gros-Islet, Soufriere, Micoud, Dennery, and Vieux Fort. Presentations were made on the REIIF project, its background, components, objectives and outcomes and the consultations were pegged to consultations on the revised electricity bill. An exit survey was administered to participants of the consultations.

2. **Introduction**
   - **Overview of the Consultation Process**: The purpose of the stakeholder consultations was three-fold. To sensitize the public on the upcoming regulatory and legislative changes and the REIIF project. gather input from stakeholders and address concerns and queries. To achieve this, the consultations were split into 2 segments both with a Q&A session to the end.
   - **Stakeholder Groups Engaged: c**ommunity members, National Electricity Regulator, National Utility, private sector representatives, academia (SALCC).

3. **Consultation Details**

| Date | Location | Stakeholder Group(s) Engaged |
|---|---|---|
| 19-Sep-2024 | Gros Islet-Human Resource Centre | National Electricity Regulator, National Utility, private sector representatives, academia (SALCC) |
| 20-Sep-2024 | DIPT Conference room | Private Sector (dedicated session) |
| 23-Sep-2024 | Soufriere - Club Whispers | community members, National Electricity Regulator, National Utility, private sector representatives, Emergency responders (Fire service) |
| 30-Sep-2024 | Dennery - Clendon Maison memorial school | community members |

| Date | Location | Stakeholder Group(s) Engaged |
|---|---|---|
| 3-Oct-2024 | Micoud – Micoud Secondary School | community members |
| 9-Oct-2024 | Vieux Fort – Vieux Fort Primary School | National Electricity Regulator, National Utility, private sector representatives, academia (SALCC). |

4. **Key Takeaways and Summary of Feedback Received**

The consultations served as an introduction to the REIIF project. There was little feedback from the participants on the project's scope and components given that the project activities are not yet well-defined. The E&S framework and ESS standards were explained to the participants and assurances given that all precautions will be taken from an E&S standpoint during the implementation of the project. Based on feedback from the exit sheets (includes Electricity bill section), participants were generally satisfied with the consultations and presentations and would appreciate further engagement.

# ANNEX 2: SITE SPECIFIC CONSULTATION AGENDA

*The Project will conduct consultations with stakeholders at the site-level during the preparation, implementation, and post-construction phases. These consultations will be carried out by Project staff (the Environmental Specialist, the Social Specialist, the CLO) in identifying and convening stakeholders as well as organizing the consultations.*

**Project Presentation:**

- Context and why the need for the Project
- Project objectives
- General Project activities

**Specific project interventions at the sub-project site**

**Positive/negative impacts for sub-project site stakeholders and Mitigation Measures**

**Grievance Management process:**

- Grievance management objectives
- Channels for filing grievances/feedback
- Grievance management process/timeline
- Reporting back on site-level grievances

**Reporting back to stakeholders:**

- Project's environmental and social performance at the site
- Implementation of the stakeholder engagement plan and performance of the grievance mechanism at the site-level
- Project's overall implementation progress

**Q&A/Discussion:**

- Do these interventions align with your needs? (preparation phase)
- What other interventions can be added? (preparation phase)
- What is the best way to get your feedback on the project?
- What is the best way to report back to you on the project's activities at various stages? (preparation phase)
- How can incentives be integrated to reduce energy costs and support the project objectives generally?

**Template to Capture Consultation Minutes**

| Stakeholder (Group or Individual) | Summary of Feedback | Response of Project Implementation Team | Follow-up Action/Next Steps |
|---|---|---|---|
| | | | |
| | | | |

# ANNEX 3: GRIEVANCE SUBMISSION FORM

| | | |
|---|---|---|
| **Date received:** | **Date: (dd-mm-yyyy)** | |
| **Grievant Name** | | □ Please keep my name confidential |
| **Other Information:** | | |
| **Contact Information:** | **Phone:**<br>**Email address:**<br>**Address:**<br>(Please indicate the preferred method of communication) | |
| **Details of grievance:** (Who, what, when, where) | □ One-time incident/complaint<br>□ Happened more than once (indicate how many times): _____<br>□ Ongoing (a currently existing problem) | |
| **How would you like to see the issue resolved?** | | |
| **Attachments to the grievance:** (e.g., pictures, reports etc.) | List here: | |

_____

**Grievant Signature (if applicable)** **Date (DD/MM/YYYY)**

_____

**Signature-Project personnel (to confirm receipt only)** **Date (DD/MM/YYYY)**

**For PIU use only:**
**Grievance Category:**
□ Power outages

□ Waste Management
□ Construction Quality/Equipment
□ Traffic/Road Access
□ Worker Safety
□ Consultations
□ Trainings
□ Other (specify) _____
**Grievance No: _____**
**Priority Level: Low/Medium/High_____**
**Grievance Owner/ Department: _____**

# ANNEX 4: GRIEVANCE MANAGEMENT REGISTRATION AND MONITORING SHEET

| No. | Name of Grievant | Date Received | Grievance uptake channel used | Location/ sub-project site, if applicable | Gender of grievant/ | Grievance category | Grievance Description | Further Intervention? | Action(s) taken by PIU | Resolution Accepted/ Not Accepted Y/N | Date | Grievant Satisfaction score (1: Highly Unsatisfied-5: Highly Satisfied) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |

# ANNEX 5: GRIEVANCE DISCLOSURE AND RELEASE FORM

***Result of Grievance Management***

| | |
|---|---|
| **Grievance No:** | |
| **Name of Grievant:** | |
| **Date Filed:** | |
| **Summary of Grievance:** | |
| **Summary of Resolution:** | |
| **Satisfaction Score of Grievant**<br><br>**(1: highly unsatisfied – 5: highly satisfied)** | |
| **Date of grievance resolution (DD/MM/YYYY):** | |

| | |
|---|---|
| **Signature of Grievant in acceptance of the suggested grievance resolution:** | **Name:** |
| **ID type and number:** | **Date (DD/MM/YYYY):** |

| | |
|---|---|
| **Signature of Social Development Specialist** | **Signature of PIU Head**: |
| | |
| **Name:**<br>**Place:**<br>**Date (DD/MM/YYYY):** | **Name:**<br>**Place:**<br>**Date (DD/MM/YYYY):** |