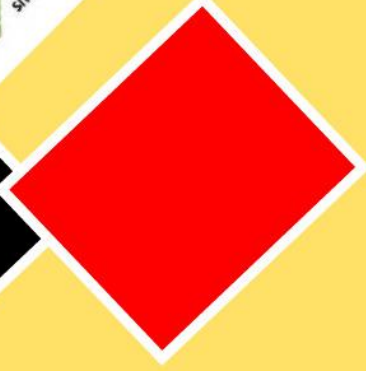


SOCIAL AUDIT: EAST COAST RELOCATION PROJECT

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SITE DEVELOPMENT PLAN- OPTION 1



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DEFINITIONS

Affected Persons: Any individual, persons, family, household, group, or collective body that is affected by either physical or economic displacement and are deemed eligible to resettlement assistance and/or compensation under this project.

Allowances: Additional cash compensation provided in addition to any resettlement assistance and/or compensation provided for the loss of assets, and transitional support provided while Affected Persons restore their living conditions and livelihoods after resettlement.

Compensation: The forms or combination of cash or in-kind replacement assets to be provided to Affected Persons to compensate the acquisition of land or the loss of assets. In most cases, compensation denotes cash only.

Economic Displacement: The loss of assets or access to assets that leads to loss of income sources or livelihoods but does NOT necessarily result in the direct loss of a place of residence.

Entitlement Framework: A framework that establishes the specific entitlements (i.e., forms of compensation) granted to Affected Persons who will lose proven assets, as determined during the Asset Inventory.

Gender Based Violence: Gender based violence (GBV) refers to any act that is perpetrated against a person's will and is based on gender norms and unequal power relationships. It includes physical, emotional, or psychological and sexual violence, and denial of resources or access to services. Violence includes threats of violence and coercion. GBV inflicts harm on women, girls, men, and boys and is a severe violation of several human rights.

Livelihoods Restoration: A range of measures and programmes that ensure that the existing livelihoods of Affected Persons are restored, or ideally improved, during and after the resettlement process.

Physical Displacement: The displacement, loss, or destruction of the place of residence as a direct result of the development of the Project.

Project-affected Household: All members of a household, whether related or not, operating as a single economic unit, who are affected by a project. Replacement cost: The rate of compensation for lost assets must be calculated at full replacement cost, that is, the market value of the assets plus transaction costs.

Resettlement Action Plan: A detailed action plan that establishes the measures to be adopted by the Project in the implementation of any resettlement and compensation.

Vulnerable groups: Vulnerable persons are defined as people who by virtue of their gender, age, social or economic status may be more adversely affected by economic

displacement, when compared to their peers (i.e., other households). These include persons with disabilities and serious illnesses, the elderly, women, youth, women and youth-headed households, persons with literacy challenges and members of historically vulnerable/marginalized communities.

Valuation Report: The investigation and measuring of all land, interest on and rights to that land, as well as any assets and unexhausted improvements on that land. The Asset Inventory forms of the basis for the determination of resettlement assistance and/or compensation to be granted to Affected Persons

ACRONYMS

GoCD	Government of the Commonwealth of Dominica
MoHUD	Ministry of Housing and Urban Development
MPWPUDE	Ministry of Public Works , Public Utilities and the Digital Economy
DOA	Division of Agriculture
PAP	Project Affected Person
PAH	Project Affected Household
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
GBV	Gender-Based-Violence
GRM	Grievance and Redress Mechanism
FGD	Focus Group Discussion
LRP	Livelihood Restoration Plan
NGO	Non-Governmental Organization
ARAP	Abbreviated Resettlement Action Plan
SEP	Stakeholder Engagement Plan
VG	Vulnerable Group
WB	World Bank
OP	Operational Policy
SEA/SH	Sexual Exploitation & Abuse/Sexual Harassment

EXECUTIVE SUMMARY

1. BACKGROUND

Following the November 2022 trough, which caused significant devastation along the East coast of Dominica, particularly in San Sauveur, Petite Soufriere, and Good Hope, the need for a permanent relocation site became evident due to widespread destruction of homes, infrastructure, and livelihoods. The relocation required selecting a site outside the affected areas and in a low hazard zone, with these communities previously earmarked for relocation following Tropical Storm Erika in 2015.

After considering various sites in Castle Bruce, Laplaine, Warner, and Sultan, a potential site in Castle Bruce emerged as the most suitable option due to its favourable risk profile, proximity to affected communities, access to development support services, and alignment with social dynamics. Land for the proposed East Coast Relocation Project, occupying approximately 11.47 acres, will be acquired in this instance through compulsory acquisition from seven private landholders and one NGO in accordance with the Land Acquisition Act Chapter 53:02. Situated near the Castle Bruce Secondary School, the site features a moderate slope conducive to housing and is resilient against flooding and landslides.

The Government of the Commonwealth of Dominica (GoCD), represented by the Ministry of Housing and Urban Development (MoHUD), aims to implement the East Coast Relocation Project as part of the existing WB Housing Relocation Project (HRP). To ensure compliance with the World Bank OP 4.12, an Abbreviated Resettlement Action Plan (ARAP) was prepared by Pure Blossom Life Essentials (PBLE), a local Engineering Firm engaged by MoHUD in March 2024.

The ARAP was supported by Valuation Reports which identify affected properties and help in determination of fair compensation rates. Negotiation Agreements were drafted based on these reports and assessments of structures and agricultural crops. The ARAP and associated surveys identified the people eligible for compensation, the nature of losses they would incur due to the Project and their respective vulnerabilities.

Our findings confirm that negotiations to establish fair and equitable compensation for all Project Affected Parties (PAPs) have been concluded, with agreements signed between the PAPs and the Government of the Commonwealth of Dominica (GoCD). Hence the land acquisition process is considered as ongoing as payments of respective PAPs as per the respective signed Negotiation Agreements and payment of crop compensation to three (3) PAPs (# 2,7,8) are still pending. The compensation process adhered to the Land Acquisition Act of Dominica in all respects and notably resulted in outcomes materially consistent with World Bank OP 4.12. GoCD is currently processing payments to the PAPs.

2. OBJECTIVES OF THE SOCIAL AUDIT

MoHUD hired a team of environmental and social specialists to conduct a Social Audit of the Project's land acquisition process, to assess compliance with Dominican land acquisition law, and the World Bank OP 4.12. The audit aimed to ensure that GoCD provided fair and prompt compensation and other relevant assistance as outlined in national law, and the WB's OP 4.12. It also aimed to assess whether affected persons' livelihoods and living standards were maintained or improved post-acquisition and to identify measures to enhance or restore them if necessary. The specific objectives included:

- Reviewing the ECRP land acquisition process to date.
- Review of records from past instances of land acquisition by GoCD within Castle Bruce.
- Review of records from land purchases within the private sector within Castle Bruce.
- Verifying the extent and scope of land acquisition using existing data.
- Verifying the status of compensation payments.
- Verifying the status of livelihood restoration measures.
- Identifying any implementation gaps or non-conformances with the World Bank OP 4.12.
- Developing a corrective action plan if needed to address gaps or non-conformances.
- Considering gender issues related to land acquisition and the project.
- Addressing the needs of vulnerable people and assessing vulnerability in the land acquisition process.

The findings of this audit are based on a fieldwork mission undertaken between February - May 2024, which included the following activities:

- **Request for Information and Document Review:** A formal request for information was submitted to the Property Valuation Unit of GoCD, to obtain all relevant project reports, documents, data, and evidence (See Appendix A).
- **Interview Program:** An interview program was undertaken by the environmental and social specialists, which included one-on-one interviews with local authorities, as well as with affected persons through Focus Group Discussions.
- **Perception Survey:** To supplement the qualitative data collected in the interviews, this audit included a Perception Survey to profile the affected persons experience of their losses, compensation payment and their responses in terms of restoring their living conditions and livelihoods.

3. FINDINGS

The key findings of this audit are as follows:

After thorough evaluation, it is determined that apart from the compensation amounts contained in the negotiation agreements between PAPs and GoCD as well as crop compensation for three (3) PAPs (PAPs # 2,7,8), no additional cash compensation is required for any of the PAPs in this instance. The rationale is based on the following considerations:

- 1. Application of Dominica Land Acquisition Act:** The compensation process adhered strictly to the Dominica Land Acquisition Act, ensuring that all affected parties received fair and equitable treatment. This legal framework produced outcomes that are materially consistent with the standards and principles of WB OP4.12.
- 2. Compensation above Market Value for Agricultural Land:** In determining the market value of one acre of agricultural land in Castle Bruce, a comparative analysis of registered land sales was conducted utilizing data obtained from the Government of the Commonwealth of Dominica (GoCD) spanning the years 2012 to 2024. This dataset includes thirty-two instances of registered land sales, with the analysis concentrating on the five highest-value transactions based on price per acre. Based on the data considered during the comparative analysis, the average value of 1 acre of agricultural land in Castle Bruce, Dominica, is \$57,506.04 XCD. To determine the market value the highest transaction value noted in the analysis, i.e. \$67,797.62 XCD, is rounded up to \$68,000.00 XCD and was noted as the present market value. All the PAPs were compensated at rates above market value.
- 3. Exceeding WB OP 4.12 Compensation Requirements:** Compensation provided under the Land Acquisition Act of Dominica resulted in compensation amounts that are 25.26%-133.36% (See Table 10) higher than the compensation requirements stipulated by WB OP4.12. This substantial difference ensures that the compensation is more than sufficient to cover the loss of land, crops, structures, legal fees, and taxes, as well as compensatory measures such as vulnerability allowance for severely affected PAPs as well as one elderly and one disabled PAP.
- 4. Satisfaction and Empowerment of Elderly and Disabled PAPs/Clear Communication and Understanding:** Throughout the land acquisition process, elderly and disabled PAPs were given a clear understanding of their rights, the land acquisition procedures, and the measures in place to mitigate any negative impacts on their livelihoods, socioeconomic standing, health, and well-being (hand holding and monitoring following compensation). This transparent

approach ensured that all PAPs were fully informed and capable of making decisions that best suited their interests.

Elderly and disabled PAPs have expressed satisfaction with the negotiated compensation amounts which shall provide them with a significant financial boost. The compensation shall empower them to fulfill personal goals, such as improving their living conditions, thereby enhancing their overall well-being.

5. **No Physical Displacement:** No PAPs will be physically displaced as a result of the ECRP land acquisition process.
6. **Low Level of Economic Displacement:** None of the PAPs shall experience moderate or high levels of economic displacement as a result of the ECRP. Since none of the affected households derived income from the lands being acquired, the impact on their household income is zero. However, noting that three (3) PAPs (PAP #2, PAP #7, PAP#8) suffered loss of crops established on their respective properties at the time of the land acquisition, there will be some economic displacement to these PAPs since a source of food to their household would have been lost due to the land acquisition for the project.
7. **Hand-Holding and Monitoring Measures:** Given that all PAPs are severely impacted, with more than 20% of their land holdings being acquired and having identified one elderly and one disabled PAP, hand-holding and monitoring measures are recommended instead of additional cash compensation. These measures include:
 - **Routine Monitoring:** Assessments by HRP Social and Environmental Specialists, with reports on the quality of life of PAHs following receipt of compensation and for a duration of 1-2 years.
 - **Financial Literacy and Management Training:** Programs to help PAHs manage their finances effectively.
 - **Support in Land Purchase:** Technical assistance in the process of purchasing new land.
 - **Fixed Deposit Strategy:** Technical assistance in establishing a fixed deposit of a percentage of the total compensation received by PAP# 1 to foster long-term financial stability.

These comprehensive support measures ensure that PAPs achieve long-term socioeconomic stability and improved quality of life.

The corrective actions recommended by this audit are summarized as follows:

- **Accelerate Compensation Payments:** Implement a streamlined process to expedite compensation payments, ensuring they are disbursed within a 9–12-month period from the conclusion of negotiations. This includes establishing a dedicated task force to monitor and resolve any delays promptly.
- **Increase Consultations and Information Dissemination:** Conduct comprehensive and ongoing consultations with Project-Affected Persons (PAPs) throughout the ARAP implementation process. This includes regular updates on project progress, compensation procedures, and available support services, ensuring PAPs are fully informed and involved in every step of the process.
- **Provide Guidance on Land Purchase and Financial Management:** Offer targeted guidance to PAPs on land purchase options and financial management, including advice on fixed deposit investments and other financial planning tools. This support should be tailored to the needs of PAPs, with special attention to those with limited financial literacy.
- **Monitor Post-Compensation Outcomes:** Establish a hand-holding and monitoring framework that tracks the well-being of PAPs for at least two (2) years following compensation receipt or at the end of the project cycle, whichever is shorter in duration. This includes regular check-ins, technical advice and mechanisms for addressing any grievances.

INTRODUCTION

Need for Project/Project Rational:

The November 2022 trough brought significant devastation to multiple communities along the East coast, notably impacting San Sauveur, Petite Soufriere, and Good Hope. This natural disaster resulted in widespread destruction of homes, infrastructure, and livelihoods, prompting the need for a permanent relocation site to mitigate future risks. One stipulation for the relocation was selecting a site outside the affected areas and in a low hazard zone. These communities had previously been earmarked for relocation following Tropical Storm Erika in 2015.

After exploring various sites in Castle Bruce, Laplaine, Warner, and Sultan, a potential site in Castle Bruce emerged as the most suitable option due to its favourable risk profile, proximity to affected communities, proximity to development support services (Health Centre, School, playing field etc.) and alignment with social dynamics.

The proposed East Coast Relocation Project will occupy approximately 11.47 acres, acquired through compulsory acquisition from seven (7) private landholders and one (1) NGO in accordance with the Land Acquisition Act Chapter 53:02. Situated near the Castle Bruce Secondary School, the site features a moderate slope conducive to housing and is resilient against flooding and landslides.

The Government of the Commonwealth of Dominica (GoCD), represented by the Ministry of Housing and Urban Development (MoHUD) aims to implement the East Coast Relocation Project as part of the existing WB Housing Rehabilitation Project (HRP).

The Project required acquisition of private land, to allow for the construction of housing units and installation of community infrastructure including roads, utilities, and communal spaces. To ensure legal compliance with the World Bank OP 4.12 an Abbreviated Resettlement Action Plan (ARAP) was prepared by Pure Blossom Life Essentials, a local Engineering Firm engaged by MoHUD in June 2024 to guide how land acquisition and relocation should be undertaken.

Additional environmental and social commitments were established concurrent to development of the ARAP, which included the Environmental and Social Impact Assessment (ESIA); Environmental and Social Management Plan (ESMP) and Disaster Risk Assessment (DRA) as defined in the Terms of Reference provided by MoHUD with input from the Physical Planning Division and WB.

The ARAP was supported by Valuation Reports, which are statutory surveys undertaken by certified valuers to identify which property is affected and to determine fair compensation rates for the loss of the property. Negotiation Agreements were also drafted based on the said Valuation Reports as well as assessments/valuations of

structures and agricultural crops/livestock which formed the basis for compensation paid by GoCD/MoHUD.

The ARAP and associated Valuation Reports, Crop Assessments and resulting Negotiation Agreements determined the affected persons eligible for compensation and other forms of assistance as required and the nature of losses they would incur as a direct result of the Project.

Table 1: Scope of Land Acquisition/Relocation for East Coast Relocation Project (ECRS-P)

Impacted Households	As per Valuation Documents	As per ARAP
Total Households	8	8
Physically Displaced	0	0
Economically Displaced	3	3
Crop loss	3	3
Loss of physical structure	1	1
Total Land Area (Acres)	11.47	11.47

Based on the Valuation Reports and subsequent records collected during the Social Audit, it is confirmed that no households (PAHs) were or will be physically displaced nor have they lost their place of residence nor were they required to relocate to a new home/location. It was also confirmed that there were no informal settlers operating on the lands to be acquired prior to the project Cut-off-date.

Implementation of the ARAP is the responsibility of MoHUD and should be completed prior to commencement of the ECRP construction phase, through the Project Implementation Unit (PIU), more specifically the Management and Staff of the Housing Recovery Project (HRP). It is understood that the land acquisition process at Castle Bruce is considered by GoCD as ongoing, pending the payment of compensation packages to PAPs.

Aim and Objectives

The aim of this audit was to determine whether GoCD provided the required (1) fair and prompt compensation, (2) relocation support, (3) livelihood restoration and (4) other relevant support as defined in the 2024 ARAP and as required under national law, and WBG OP 4.12.

This audit further assessed whether the livelihoods and living standards of PAPs are similar to, or exceed, those enjoyed prior to land acquisition; and if that is not the case, what additional measures, if any, are needed to help improve, or at least restore, livelihood and living standards. This audit also considered the extent to which it would be

necessary to implement special measures pertaining to vulnerable groups. The specific objectives of this audit included:

- A. Reviewing the land acquisition process undertaken to date.
- B. Verifying, using existing data, the extent/scope of the land acquisition.
- C. Verifying the status of compensation payments.
- D. Verifying the status of any livelihood restoration programmes.
- E. Identifying any implementation gaps / non-conformances against the World Bank OP 4.12.
- F. Preparing, if required, a corrective action plan to address the gaps / non-conformances.
- G. Consideration of land acquisition/project related gender issues.
- H. Consideration of vulnerable people and vulnerability in land acquisition process.

Fieldwork Method

To support the preparation of this audit, the following fieldwork was undertaken:

- **Request for Information and Document Review:** A formal request for information was submitted to the Property Valuation Unit of GoCD, to obtain all relevant project reports, documents, data, and evidence. GoCD has freely provided all relevant documentation in support of the audit.

Process Documentation:

The following documentation is utilized in administration of the land acquisition process in accordance with the Land Acquisition Act of the Commonwealth of Dominica:

1. Negotiation Status Tracking Log.
2. Valuation of Land prepared by PAP(s).
3. Valuation of Land prepared by GoCD.
4. Land Acquisition Negotiation Agreement Form.
5. Negotiation for Acquisition of Land Form.
6. Cabinet Decision with respect of Lands proposed for Acquisition by Authorized Officer (Classified as Confidential).
7. Gazette containing declaration by Authorized Officer.
8. Lot Survey Plans prepared by PAPs.
9. Lot Survey Plans prepared by the State.

In addition, this audit collated data to present a PAP list, with the type of losses incurred by each PAP/PAH, as well as the type of compensation that has been determined.

- **Interview Program:** An interview program was undertaken by the environmental and social specialists, which included one-on-one interviews with local

authorities, as well as with PAPs through Focus Group Discussions. This included hosting interviews with women separately from men. The details of interviews conducted are presented in Table 2.

Table 2 Interview Program for East Coast Relocation Project

No.	Interview Description	Date of Interview	No. Of Participants
1	MoHU	21/02/24	3
2	HRP	18/04/24	3
3	MoHUD/Tech Committee	08/05/24	7
4	Property Valuation Unit	29/05/24	5
5	Castle Bruce Village Council	19/03/24	5
6	Focus Group Discussion – PAP Women	17/05/24	4
7	Focus Group Discussion – PAP Men	17/05/24	4

A question guide and summary responses of each interview is presented in Appendix C. Records were retained in the form of meeting notes, supported by a formal register which can be found in Appendix E.

- Perception Survey:** To supplement the qualitative data collected during the interviews, this audit included a Perception Survey to profile the PAPs experience of their losses, compensation payment and their responses in terms of restoring their living conditions and livelihoods.

The Perception Survey covered all eight (8) affected households since the total number of PAPs is small. A copy of the survey is presented in Appendix D.

1 COMPLIANCE FINDINGS

Land Acquisition Act of Dominica: Compulsory Land Acquisition Process

The Act outlines a detailed process for determining compensation. Initially, the Department of Lands evaluates the market value of the land. A Cabinet paper then formalizes the government's intention to acquire the land, followed by negotiations with the landowner to agree on compensation.

During the negotiation process, meetings are convened with the landowner to facilitate discussions and reach a mutual agreement. A Negotiation Agreement Form is used to document the details of these discussions and the progression of negotiations. Landowners may engage valuation experts to assess the market value of their property

and seek legal counsel to represent and advise them. They are also encouraged to propose any form of compensation they wish to be considered.

Once both parties reach an agreement, a formal Negotiation Agreement is signed and submitted to Cabinet for consideration. If Cabinet approves the agreed terms of compensation, the negotiation process is deemed complete, and the process to facilitate the payment of the agreed compensation commences. According to Section 3 of the Act, "Upon the second publication of the declaration in the Gazette, the land shall vest absolutely in the State."

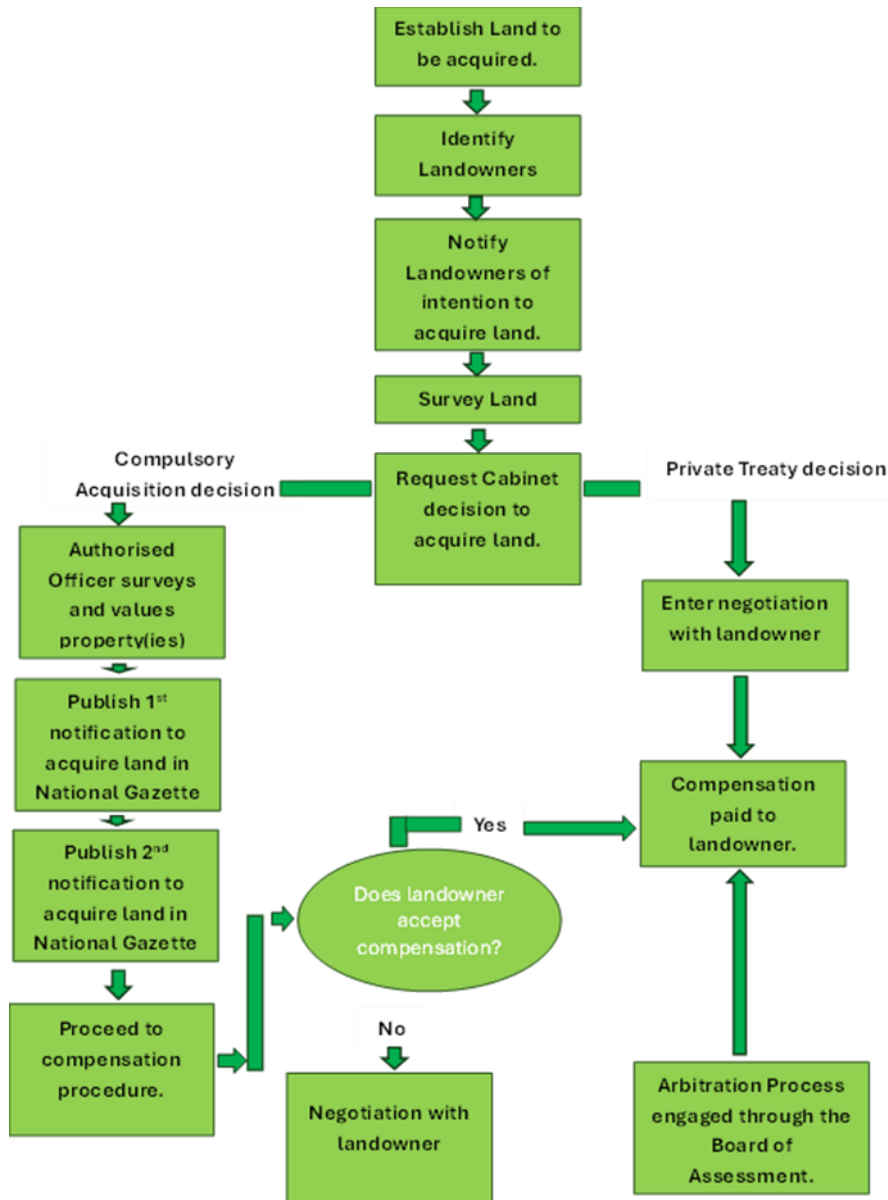


Figure 1 The General Process of Acquiring Land through Compulsory Acquisition in Dominica (Source GoCD)

This process differs from the land acquisition process as defined in WB OP 4.12 in that compensation under OP 4.12 requires the evaluation to cover full replacement cost for each party, rather than market value covered by national requirements. In addition, World Bank OP 4.12 requires compensation for land users without legal rights (informal settlers), support for vulnerable parties, and livelihood restoration measures that are not covered under national law. WB OP 4.12 also requires that compensation be completed prior to Project construction and that consultation associated with this process be well documented.

EVALUATION OF COMPLIANCE WITH LAND ACQUISITION ACT – DOMINICA

Table 3 STEPS IN THE LAND ACQUISITION PROCESS

#	Step	Documentation	Verification	Details/Comments
1	Establish that Land Acquisition is Required.	Request from GoCD/Cabinet, Ministry/Department to Lands & Surveys Division to identify lands to wit...	Review of memo, Official correspondence to Lands and Surveys Division.	11.47 acres requested Re: ECRS-P.
2	Identify Landowners.	Site analysis reports; Site Selection Criteria; Draft List of property owners.	Review of final list of property owners	8 property owners affected
3	Notify Landowners of Intention to Acquire Land.	Correspondence to landowners.	Review of notice to landowners (April 2023)	A letter was sent to each PAH -HH.
4	Survey Land to be acquired.	Survey plan of lands to be acquired.	Review of Project Survey Plan	Survey Plan is up to date and accurate.
5	Request Cabinet Decision to Acquire Land.	Memo/Minute Paper to Cabinet.	Review of Memo. February 23, 2023	Confirmed as completed.
6	Establish whether land will be acquired through private treaty or compulsory acquisition.	Second correspondence to landowners and determination as to which option will be engaged (Private Treaty or Compulsory Acquisition)	Land will be acquired through compulsory acquisition.	Confirmed as completed.
7	Authorized Officer Surveys and Values the land	Property Valuation Unit conducts valuation exercise. PAHs invited to submit private valuations by competent professionals.	Valuation Document produced with respect to each property under consideration.	Valuation documents (For five (5) properties there were (2) valuations, one prepared by GoCD and one prepared by the PAH. In the remaining three (3) cases, only the GoCD valuation was prepared) included in folders for each PAH at Property Valuation Unit.
8	Publish 1st Notification of	1st Notice in Gazette	Review of Gazette: Gazette No25, Published May 4, 2023	Confirmed as completed.

	intention to acquire land in Gazette.			
9	Publish 2nd Notification of intention to acquire land in Gazette.	2nd Notice in Gazette	Review of Gazette: Gazette No26, Published May 11, 2023	Confirmed as completed.
10	Compensation Procedure	The process of determining the amount and modalities of compensation due to each PAH is conducted by the property valuation unit.	Notes/Details of Negotiation Agreement Document.	Confirmed as completed.
11	Acceptance or rejection of offer by PAH.	Based on findings of the valuation exercise and calculation of compensation due, an initial offer is proposed to the PAH.	Notes/Details of Negotiation Agreement Document.	Confirmed as completed.
12	In the case of an agreement on the initially offered compensation amount, a negotiation agreement will be signed and forwarded to Cabinet for a final decision.	Negotiation Agreement Form. Draft Negotiation Agreement.	Notes/Details of Negotiation Agreement Document.	Confirmed as completed. (PAH # 5 accepted the initial offer)
13	In the case of rejection of the initial offer proposed by GoCD, a negotiation process is conducted. Once both parties have reached agreement, the matter is directed to Cabinet for a final decision.	Negotiation Agreement Form. Private Valuation. Revised Negotiation Agreement Form.	The negotiation process regarding land, physical structures and crops as per the Land Acquisition Act is concluded. All signed negotiation agreements have been forwarded to Cabinet.	Confirmed as completed. (PAH # 1,2,3,4,6,7,8 engaged in negotiation to establish compensation amount)
14	If Cabinet approves the signed negotiation agreement, then the process to facilitate payment is initiated	Decision of Cabinet is communicated to MoHUD and subsequently to PAHs.	To date, Cabinet has approved payment for land/structures for all (8) PAHs.	Ongoing as crop compensation for three (3) PAHs is pending approval.
15	If the negotiation fails but the government still intends to acquire the land, the matter can be brought to a Board of Assessment to conduct the arbitration process.	NA		No such case has emerged from the land acquisition process thus far. Moreover, agreements have been signed with all relevant PAHs (1-8).

Comparative Analysis of Agricultural Land Purchase in Castle Bruce, Dominica

Table 4 Comparative Analysis of Agricultural Land Purchase in Castle Bruce

#	Code	Location	Date Of Sales Registration	Size of Property (Acres)	Land Zoning/Classification	Asking Price Per Acre (XCD) (Market Value)
1	AI	Castle Bruce	16/04/2015	0.557	Agricultural	\$61,041.00
2	B2	Castle Bruce	26/02/2014	3.000	Agricultural	\$50,000.00
3	CT	Castle Bruce	24/09/2018	0.525	Agricultural	\$43,560.00
4	DC	Castle Bruce	30/01/2017	1.520	Agricultural	\$65,131.58
5	EK	Castle Bruce	17/05/2021	1.010	Agricultural	\$67,797.62
					Average	\$57,506.04

Comparative Analysis: Agricultural Land – Castle Bruce

The data presented in Table 4 is based on information obtained from the Government of the Commonwealth of Dominica (GoCD) spanning the years 2012 to 2024. This dataset includes thirty-two instances of registered land sales, with the analysis concentrating on the five highest-value transactions based on price per acre. The dataset is presented in full in Appendix J of this Social Audit.

Representative Market Value: Agricultural Land – Castle Bruce 2024

Market Value:

- The average value of 1 acre of agricultural land in Castle Bruce was calculated as \$57,506.04 XCD. The highest value, \$67,797.62 XCD, was rounded to \$68,000.00 XCD to calculate the estimated market value, which will subsequently be used to determine the full replacement cost according to the World Bank’s OP 4.12.

Average Price Calculation:

- Determined the average purchase price per acre based on the selected five transactions.
- Rounded up the highest value observed to estimate the market value for 1 acre of agricultural land in Castle Bruce.

Methodology:

Data Collection

1. **Source of Data:** The data was collected from records provided by the Government of the Commonwealth of Dominica (GoCD) for the period from 2012 to 2024.
2. **Dataset:** The dataset includes a total of thirty-two instances of registered agricultural land sales in Castle Bruce.

Data Selection

1. **Criteria for Selection:** From the complete dataset, five transactions of agricultural land with the highest asking price per acre were selected for detailed analysis. The criteria for selection were:
 - **Sales Price Per Acre:** Highest values based on the sale price in XCD (Eastern Caribbean Dollars).

- **Transaction Details:** Each selected transaction includes information on location, date of sales registration, size of the property, land zoning/classification (agricultural), and price per acre.
2. **Selected Transactions:** The selected transactions are summarized in Table 1, which includes:
- **Location:** Specific location within Castle Bruce.
 - **Date of Sales Registration:** The date when the sale was officially registered.
 - **Size of Property:** Size in acres.
 - **Land Zoning/Classification:** Land use designation – Agricultural Land.
 - **Price Per Acre:** The market value in XCD.

Analysis Framework

1. **Influence of Property Size:**

- **Large Properties:** Analyzed properties with larger acreage to identify if their per-acre prices are generally lower due to economies of scale or other factors.
- **Small Properties:** Examined smaller properties to determine if they tend to have higher per-acre prices, possibly due to higher demand for smaller, more manageable plots.

2. **Terrain and Topography:**

- Assessed how terrain and topographical features affect market value. Properties with advantageous agricultural conditions were analyzed to see if they command higher prices.

3. **Location:**

- Investigated the impact of specific locations within Castle Bruce on land values. Considered factors such as proximity to infrastructure, accessibility, and soil quality.

4. **Risk Profile:**

- Evaluated the influence of risk factors such as susceptibility to natural disasters, accessibility, and proximity to essential infrastructure on land prices.

Comparative Analysis

1. **Price Comparison:**

- Calculated the average sale/purchase price per acre from the five highest-value transactions.

- Compared individual transaction values to understand price variation based on size, location, and other factors.

2. Trend Analysis:

- Identified trends and patterns in the pricing of agricultural land, considering the impact of different factors on price variation.

Methodology for Calculating Vulnerability Allowance for PAPs Severely Impacted/Affected by Land Acquisition for the East Coast Relocation Project

1. Research and Review of Minimum Wage Rates:

- The minimum wage rates effective September 1, 2021, established by the Government of the Commonwealth of Dominica (GoCD) were researched and reviewed.

2. Selection of the Highest Minimum Wage Rate:

- The highest minimum wage rate identified is \$8.00 per hour, which applies to Security Guards.

3. Calculation Basis:

- The calculation is based on a standard work schedule of eight (8) hours per day and forty (40) hours per week.

4. Duration of Allowance:

- The allowance is calculated for a period of six months.

5. Monthly and Total Allowance Calculation:

- **Monthly Amount:**
 - $\$8.00 \text{ per hour} \times 8 \text{ hours per day} \times 5 \text{ days per week} \times 4 \text{ weeks per month} = \$1,280.00$
- **Total Amount for Six Months:**
 - $\$1,280.00 \text{ per month} \times 6 \text{ months} = \$7,680.00$

6. Total Vulnerability Allowance:

- Therefore, the total amount awarded as the Vulnerability Allowance under the East Coast Relocation Project (ECRP) is \$7,680.00.

Policy Gap Analysis

The section below compares the national land acquisition law with the World Bank’s OP 4.12 on Involuntary Resettlement. It also includes an analysis that compares negotiated compensation rates with full replacement costs as per the World Bank’s OP 4.12.

Table 5 Policy Gap Analysis

Conflict/Gap	Local Legal Framework/Policy	World Bank Policy Requirements	Measures to Address Conflict/Gap
Compensation & Restoration of livelihoods and living standards	Currently, there are no established laws or official policy documents in Dominica that specifically address resettlement initiatives, except those formulated in direct response to a disaster.	OP 4.12: Section 6 (c) – Where necessary.....compensation should also include measures to ensure that displaced persons are offered support after displacement for a transition period, the time likely to be needed to restore their livelihood and standards of living. The displaced persons should also be provided with development assistance such as land preparation, credit facilities, training or job opportunities, in addition to the other compensation measures stipulated.	<ul style="list-style-type: none"> The Social and Environmental Safeguards, specifically OP 4.12, of the World Bank take precedence. All PAPS should be eligible for compensation at full replacement cost for lost assets and assistance to support livelihood restoration as per World Bank Policy requirements.
Support for displacement	Policies resembling those of the World Bank, which address the restoration of income sources and livelihoods, as well as support during a transitional phase after displacement, are not applicable except in cases developed in response to natural disasters.	OP 4.12: Section 2 (c) – Displaced persons should be assisted in their efforts to improve their livelihood and standards of living or at least to restore them in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher	<ul style="list-style-type: none"> The Social and Environmental Safeguards of the World Bank take precedence. All PAPS should be eligible for full compensation benefits as per World Bank policy requirements.
Development assistance	Whereas the Land Acquisition Act does not include clauses pertaining to development assistance, in practice, the process of compulsory land acquisition as it presently exists is designed to achieve objectives materially consistent with the WB Standards by virtue of Cabinet Decisions as required by the said Act.	OP 4.12: Section 2 (c) – Displaced persons should be assisted in their efforts to improve their livelihood and standards of living or at least to restore them in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher	<ul style="list-style-type: none"> The Social and Environmental Safeguards of the World Bank take precedence. All PAPS should be eligible for full compensation benefits as per World Bank policy requirements.
Timing for the Payment of Compensation and Taking possession of Land Acquired	Not specifically addressed within the Land Acquisition Act.	OP 4.12 Possession of the land acquired and related assets only after compensation has been previously paid in full.	<ul style="list-style-type: none"> The Bank’s ESS will take precedence. HRP Grievance and Redress Mechanism (GRM) shall be utilized.

GAP Analysis – Compensation under the Land Acquisition Act vs. WB OP 4.12 for Land, Structures, and Legal Fees: This table presents a comparative analysis of compensation provided to Project-Affected Households (PAHs) under the Land Acquisition Act (LAA) and the World Bank's Operational Policy 4.12 (WB OP 4.12). The focus is on compensation for the permanent loss of land and structures, with additional consideration for legal fees as stipulated by WB OP 4.12.

Table 6 GAP Analysis – Compensation– Land Acquisition Act: Land, Structures; WB OP 4.12: Land, Structures, Legal Fees

PAH#	Type of Loss	Eligibility Criteria	Entitlement	Lot Size/ Parcel Code	Land Acquisition Act – Details of Compensation – Land, Structures	WB OP 4.12 - Details of Compensation – Land, Structures, Legal Fees (Calculated at the rate of \$68,000/acre)	Percentage Difference LAA/WB OP4.12	GAPs between Compensation based upon Land Acquisition Act (MV) and Compensation as per WB OP 4.12 (FRC)
1	<ul style="list-style-type: none"> Permanent loss of land Permanent loss of a structure 	<ul style="list-style-type: none"> Land acquired by GoCD by compulsory acquisition. Structure established on property before cut off date. 	<ul style="list-style-type: none"> Compensation for land at FRC Compensation for structure at FRC (No depreciation applied) Vulnerability Allowance 	<ul style="list-style-type: none"> Lot#1V 0.5 acres 	Land - \$130,680.00 Structure - \$44,000.00 PAH Total Comp. LAA-D/ca: <ul style="list-style-type: none"> \$174,680.00 	<ul style="list-style-type: none"> Land - \$34,000.00 Legal Fees - \$2,210.00 Structure - \$44,000.00 PAH Total Comp. WB OP 4.12: <ul style="list-style-type: none"> \$80,210.00 	117.78%	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.
2	<ul style="list-style-type: none"> Permanent loss of land Permanent loss of trees and crops 	<ul style="list-style-type: none"> Land acquired by GoCD by compulsory acquisition. 	<ul style="list-style-type: none"> Compensation for land at FRC Compensation for crops at FRC Rehabilitation Package 	<ul style="list-style-type: none"> Lot#1Z 3.23 acres 	Land - \$461,890.00 PAH Total Comp. LAA-D/ca: <ul style="list-style-type: none"> \$461,890.00 	<ul style="list-style-type: none"> Land - \$219,640.00 Legal Fees - \$14,276.60 PAH Total Comp. WB OP 4.12: <ul style="list-style-type: none"> \$233,916.60 	97.46%	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.
3	Permanent loss of land	<ul style="list-style-type: none"> Land acquired by GoCD by compulsory acquisition. 	Compensation for land at FRC <ul style="list-style-type: none"> Rehabilitation Package 	<ul style="list-style-type: none"> Lot#1J 2.72 acres 	Land - \$272,000.00 PAH Total Comp. LAA-D/ca: <ul style="list-style-type: none"> \$272,000.00 	<ul style="list-style-type: none"> Land - \$184,960.00 Legal Fees - \$12,022.40 PAH Total Comp. WB OP 4.12: <ul style="list-style-type: none"> \$196,982.40 	38.08%	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.
4	Permanent loss of land	<ul style="list-style-type: none"> Land acquired by GoCD by 	<ul style="list-style-type: none"> Compensation for land at FRC 	<ul style="list-style-type: none"> Lot#1L 	Land - \$66,716.35	<ul style="list-style-type: none"> Land - \$27,880.00 Legal Fees - \$1,812.20 	124.69%	<ul style="list-style-type: none"> Compensation is materially

		compulsory acquisition.	<ul style="list-style-type: none"> Rehabilitation Package 	<ul style="list-style-type: none"> 0.41 acres 	PAH Total Comp. LAA-D/ca: <ul style="list-style-type: none"> \$66,716.35 	PAH Total Comp. WB OP 4.12: <ul style="list-style-type: none"> \$29,692.20 		consistent with WB OP 4.12 <ul style="list-style-type: none"> No gaps in compensation amount.
5	Permanent loss of land	<ul style="list-style-type: none"> Land acquired by GoCD by compulsory acquisition. 	<ul style="list-style-type: none"> Compensation for land at FRC Rehabilitation Package 	<ul style="list-style-type: none"> Lot#1Z 0.343 acres 	Land - \$74,770.00 PAH Total Comp. LAA-D/ca: <ul style="list-style-type: none"> \$74,770.00 	<ul style="list-style-type: none"> Land - \$23,324.00 Legal Fees - \$1,516.06 PAH Total Comp. WB OP 4.12: <ul style="list-style-type: none"> \$24,840.06 	201.01%	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.
6	Permanent loss of land	<ul style="list-style-type: none"> Land acquired by GoCD by compulsory acquisition. 	<ul style="list-style-type: none"> Compensation for land at FRC Rehabilitation Package 	<ul style="list-style-type: none"> Lot#1N 0.350 acres 	Land - \$60,932.00 PAH Total Comp. LAA-D/ca: <ul style="list-style-type: none"> \$60,932.00 	<ul style="list-style-type: none"> Land - \$23,800.00 Legal Fees - \$1,547.00 PAH Total Comp. WB OP 4.12: <ul style="list-style-type: none"> \$25,347.00 	140.39%	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.
7	Permanent loss of land	<ul style="list-style-type: none"> Crops established on property before cutoff date. Acquisition of 20% or more of lands owned by GoCD. 	<ul style="list-style-type: none"> Compensation for land at FRC Compensation for crops at FRC Rehabilitation Package 	<ul style="list-style-type: none"> Lot#1O 3.575 Acres 	Land - \$334,262.50 PAH Total Comp. LAA-D/ca: <ul style="list-style-type: none"> \$334,262.50 	<ul style="list-style-type: none"> Land - \$243,100.00 Legal Fees - \$15,801.50 PAH Total Comp. WB OP 4.12: <ul style="list-style-type: none"> \$258,901.50 	29.11%	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.
8	Permanent loss of land	<ul style="list-style-type: none"> Crops established on property before cutoff date Acquisition of 20% or more of lands owned by GoCD. 	<ul style="list-style-type: none"> Compensation for land at FRC Compensation for crops at FRC Rehabilitation Package 	<ul style="list-style-type: none"> Lot#1U 0.34 Acres 	Land - \$74,120.00 PAH Total Comp. LAA-D/ca: <ul style="list-style-type: none"> \$74,120.00 	<ul style="list-style-type: none"> Land - \$23,120.00 Legal Fees - \$ 1,502.80 PAH Total Comp. WB OP 4.12: <ul style="list-style-type: none"> \$24,622.80 	201.02%	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.

Note: Legal Fees = 6.5% of the Value of Lands purchased/transferred

GAP Analysis – Compensation Comparison between the Land Acquisition Act (LAA) and WB OP 4.12 for Crops and Vulnerability Allowance: This table presents a GAP analysis comparing the compensation provided under the Land Acquisition Act (LAA) with that required by the World Bank's Operational Policy 4.12 (WB OP 4.12) for Project-Affected Households (PAHs) who have experienced loss of crops and are entitled to vulnerability allowance in light of vulnerabilities identified, which is a requirement under WB OP 4.12 for eligible PAHs.

Table 7 GAP Analysis – Compensation– Land Acquisition Act: Crops; WB OP 4.12: Crops, Vulnerability Allowance

PAH#	Type of Loss	Eligibility Criteria	Entitlement	Lot Size/Parcel Code	Land Acquisition Act – Details of Compensation – Crops	WB OP 4.12 - Details of Compensation – Crops, Vulnerability Allowance	GAPs between Compensation based upon Land Acquisition Act (MV) and Compensation as per WB OP 4.12 (FRC)
1	<ul style="list-style-type: none"> Permanent loss of land Permanent loss of a structure 	<ul style="list-style-type: none"> Acquisition of 20% or more of lands owned by GoCD. 	<ul style="list-style-type: none"> Vulnerability Allowance 	<ul style="list-style-type: none"> Lot#1V 0.5 acres 	<ul style="list-style-type: none"> Crop Compensation \$0.00 <p>PAH Total Comp. LAA-D/ca:</p> <ul style="list-style-type: none"> \$0.00 	<ul style="list-style-type: none"> Crop Compensation - \$0.00 Vulnerability Allowance - \$7,680.00 <p>PAH Total Comp. WB OP 4.12:</p> <ul style="list-style-type: none"> \$7,680.00 	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.
2	<ul style="list-style-type: none"> Permanent loss of land Permanent loss of trees and crops 	<ul style="list-style-type: none"> Crops established on property before cutoff date. Acquisition of 20% or more of lands owned by GoCD. Disabled 	<ul style="list-style-type: none"> Compensation for crops at FRC Rehabilitation Package 	<ul style="list-style-type: none"> Lot#1Z 3.23 acres 	<ul style="list-style-type: none"> Crop Compensation \$4,350.00 <p>PAH Total Comp. LAA-D/ca:</p> <ul style="list-style-type: none"> \$4,350.00 	<ul style="list-style-type: none"> Crop Compensation - \$4,350.00 Vulnerability Allowance - \$7,680.00 <p>PAH Total Comp. WB OP 4.12:</p> <ul style="list-style-type: none"> \$12,030.00 	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.
3	Permanent loss of land	<ul style="list-style-type: none"> Acquisition of 20% or more of lands owned by GoCD. Elderly 	<ul style="list-style-type: none"> Vulnerability Allowance 	<ul style="list-style-type: none"> Lot#1J 2.72 acres 	<ul style="list-style-type: none"> Crop Compensation \$0.00 <p>PAH Total Comp. LAA-D/ca:</p> <ul style="list-style-type: none"> \$0.00 	<ul style="list-style-type: none"> Crop Compensation - \$0.00 Vulnerability Allowance - \$7,680.00 <p>PAH Total Comp. WB OP 4.12:</p> <ul style="list-style-type: none"> \$7,680.00 	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.

4	Permanent loss of land	<ul style="list-style-type: none"> Acquisition of 20% or more of lands owned by GoCD. 	<ul style="list-style-type: none"> Vulnerability Allowance 	<ul style="list-style-type: none"> Lot#1L 0.41 acres 	Crop Compensation \$0.00 PAH Total Comp. LAA-D/ca: <ul style="list-style-type: none"> \$0.00 	<ul style="list-style-type: none"> Crop Compensation - \$0.00 Vulnerability Allowance - \$7,680.00 PAH Total Comp. WB OP 4.12: <ul style="list-style-type: none"> \$7,680.00 	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.
5	Permanent loss of land	<ul style="list-style-type: none"> Acquisition of 20% or more of lands owned by GoCD. 	<ul style="list-style-type: none"> Vulnerability Allowance 	<ul style="list-style-type: none"> Lot#1Z 0.343 acres 	Crop Compensation \$0.00 PAH Total Comp. LAA-D/ca: <ul style="list-style-type: none"> \$0.00 	<ul style="list-style-type: none"> Crop Compensation - \$0.00 Vulnerability Allowance - \$7,680.00 PAH Total Comp. WB OP 4.12: <ul style="list-style-type: none"> \$7,680.00 	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.
6	Permanent loss of land	<ul style="list-style-type: none"> Acquisition of 20% or more of lands owned by GoCD. 	<ul style="list-style-type: none"> Vulnerability Allowance 	<ul style="list-style-type: none"> Lot#1N 0.350 acres 	Crop Compensation \$0.00 PAH Total Comp. LAA-D/ca: <ul style="list-style-type: none"> \$0.00 	<ul style="list-style-type: none"> Crop Compensation - \$0.00 Vulnerability Allowance - \$7,680.00 PAH Total Comp. WB OP 4.12: <ul style="list-style-type: none"> \$7,680.00 	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.
7	Permanent loss of land	<ul style="list-style-type: none"> Crops established on property before cutoff date. Acquisition of 20% or more of lands owned by GoCD. 	<ul style="list-style-type: none"> Compensation for crops at FRC Rehabilitation Package 	<ul style="list-style-type: none"> Lot#1O 3.575 Acres 	Crop Compensation \$3,700.00 PAH Total Comp. LAA-D/ca: <ul style="list-style-type: none"> \$3,700.00 	<ul style="list-style-type: none"> Crop Compensation - \$3,700.00 Vulnerability Allowance - \$7,680.00 PAH Total Comp. WB OP 4.12: <ul style="list-style-type: none"> \$11,380.00 	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.
8	Permanent loss of land	<ul style="list-style-type: none"> Crops established on property before cutoff date Acquisition of 20% or more of lands owned by GoCD. 	<ul style="list-style-type: none"> Compensation for crops at FRC Rehabilitation Package 	<ul style="list-style-type: none"> Lot#1U 0.34 Acres 	<ul style="list-style-type: none"> Crop Compensation \$28,730.00 PAH Total Comp. LAA-D/ca: <ul style="list-style-type: none"> \$28,730.00 	<ul style="list-style-type: none"> Crop Compensation - \$28,730.00 Vulnerability Allowance - \$7,680.00 PAH Total Comp. WB OP 4.12: <ul style="list-style-type: none"> \$36,410.00 	<ul style="list-style-type: none"> Compensation is materially consistent with WB OP 4.12 No gaps in compensation amount.

Comparative Analysis of Land Valuations and Negotiated Compensation:

This table presents a comparison of private land valuations, Government of the Commonwealth of Dominica (GoCD) land valuations, and the final negotiated compensation amounts for various Project-Affected Households (PAHs). The analysis highlights how socioeconomic factors, percentage of respective total land holdings acquired for the project, potential for residential development, and strategic importance influenced the final compensation agreements.

Table 8 Comparative Analysis: Land Valuations and Negotiated Land Compensation

PAH#	Lot Size/Parcel Code	Private Land Valuation	GoCD Land Valuation	Negotiated Land Compensation	Remarks
1	<ul style="list-style-type: none"> Lot#1V 0.5 acres 	\$152,460.00	\$98,010.00	\$174,680.00	The negotiated compensation reflects a premium over both valuations, likely due to: <ul style="list-style-type: none"> Valuation included compensation for concrete foundation (2,304sqft). Socioeconomic background of PAP. Over 20% of land holdings acquired. Potential for residential development.
2	<ul style="list-style-type: none"> Lot#1Z 3.23 acres 	\$484,500.00	\$387,600.00	\$461,890.00	The compensation aligns closer to the private valuation, likely due to: <ul style="list-style-type: none"> Socioeconomic background of PAP. Over 20% of land holdings acquired. Potential for residential development. The land's strategic importance.
3	<ul style="list-style-type: none"> Lot#1J 2.72 acres 	None	\$244,800.00	\$272,000.00	The negotiated amount is moderately higher than the GoCD valuation, indicating acceptance of the state's assessment with moderate negotiation adjustments.
4	<ul style="list-style-type: none"> Lot#1L 0.41 acres 	None	\$66,176.35	\$66,716.35	The negotiated amount is marginally higher than the GoCD valuation, indicating acceptance of the state's assessment with

					minimal negotiation adjustments.
5	<ul style="list-style-type: none"> • Lot#1Z • 0.343 acres 	\$31,446.00	\$74,770.00	\$74,770.00	The final compensation aligns with the GoCD valuation, suggesting acceptance of the governments assessment with no negotiation adjustments.
6	<ul style="list-style-type: none"> • Lot#1N • 0.350 acres 	\$15,233.00	\$53,315.50	\$60,932.00	<p>The negotiated compensation reflects a premium over both valuations, likely due to:</p> <ul style="list-style-type: none"> • Socioeconomic background of PAP. • Over 20% of land holdings acquired. • Potential for residential development. <p>The land's strategic importance.</p>
7	<ul style="list-style-type: none"> • Lot#1O • 3.575 Acres 	\$375,000.00	\$268,125.00	\$334,262.50	The compensation is balanced between the valuations, indicating a compromise reflecting both the owner's expectations and the GoCD's valuation methodology.
8	<ul style="list-style-type: none"> • Lot#1U • 0.34 Acres 	None	\$59,296.00	\$74,120.00	<p>The absence of a private valuation and the higher negotiated compensation suggest a successful negotiation by the owner, possibly due to:</p> <ul style="list-style-type: none"> • Socioeconomic background of PAP. • Over 20% of land holdings acquired. • Potential for residential development. • The land's strategic importance. the land's strategic importance.

Note: The names, addresses, telephone numbers and details of stakeholder identity have been removed to protect their privacy.

PAP Land Holdings - % of Land Holdings Acquired for ECRP: All the eight (8) landowners are severely impacted as more than 20% of their land holding is being acquired and hence eligible for vulnerability allowance. However, none of them reside on the parcels of land being acquired as they have homes elsewhere. Furthermore, they do not receive any agricultural incomes from these land parcels.

Table 9 PAP Land Holdings - % of Land Holdings Acquired for ECRP

PAP#	Lot Size/Parcel# Acquired for ECRP	Remaining Land Holdings: Size, location, classification	% of Total Land Holdings Acquired for ECRP	Severely Affected (WB OP 4.12)
1	<ul style="list-style-type: none"> • Lot#1V • 0.5 acres 	<ul style="list-style-type: none"> • 0.5 acres Belles - Agri; • 5,000 sqft Dublanc -Agri 	<ul style="list-style-type: none"> • 44.85% 	Yes
2	<ul style="list-style-type: none"> • Lot#1Z • 3.23 acres 	None	<ul style="list-style-type: none"> • 100% 	Yes
3	<ul style="list-style-type: none"> • Lot#1J • 2.72 acres 	<ul style="list-style-type: none"> • 2,000 sqft - Castle Bruce – Residential 	<ul style="list-style-type: none"> • 98.33 % 	Yes
4	<ul style="list-style-type: none"> • Lot#1L • 0.41 acres 	None	<ul style="list-style-type: none"> • 100% 	Yes
5	<ul style="list-style-type: none"> • Lot#1Z • 0.343 acres 	None	<ul style="list-style-type: none"> • 100% 	Yes
6	<ul style="list-style-type: none"> • Lot#1N • 0.350 acres 	None	<ul style="list-style-type: none"> • 100% 	Yes
7	<ul style="list-style-type: none"> • Lot#1O • 3.575 Acres 	None	<ul style="list-style-type: none"> • 100% 	Yes
8	<ul style="list-style-type: none"> • Lot#1U • 0.34 Acres 	<ul style="list-style-type: none"> • 3,500 sqft Jimmit – Residential 	<ul style="list-style-type: none"> • 80.89 	Yes

Note: The names, addresses, telephone numbers and details of stakeholder identity have been removed to protect their privacy.

GAP Analysis – Comparison of Negotiated Compensation vs. Total Compensation as per WB OP 4.12: This table presents a comparison of the total compensation provided to Project-Affected Households (PAHs) under the Land Acquisition Act (LAA) and the total compensation requirements outlined by World Bank Operational Policy 4.12 (WB OP 4.12). The analysis focuses on the differences between the two frameworks in terms of compensation for land, structures, legal fees, crops, and the vulnerability allowance.

Table 10 GAP Analysis – Comparison of Negotiated Compensation vs. Total Compensation as per WB OP 4.12

		Land Acquisition Act			WB OP 4.12			Percentage Difference LAA/WB OP4.12 Total
PAH#	Lot Size/Parcel Code	Compensation – Land, Structures	Compensation – Crops	LAA-Total	Compensation – Land, Structures, Legal Fees	Compensation – Crops, Vulnerability Allowance	WB OP 4.12-Total	
1	<ul style="list-style-type: none"> • Lot#1V • 0.5 acres 	\$174,680.00	\$0.00	\$174,680.00	\$80,210.00	\$7,200.00	\$87,410.00	99.84%
2	<ul style="list-style-type: none"> • Lot#1Z • 3.23 acres 	\$461,890.00	\$4,350.00	\$466,240.00	\$233,916.60	\$12,030.00	245,466.60	89.94%
3	<ul style="list-style-type: none"> • Lot#1J • 2.72 acres 	\$272,000.00	\$0.00	\$272,000.00	\$196,982.40	\$7,200.00	204,182.40	33.21%
4	<ul style="list-style-type: none"> • Lot#1L • 0.41 acres 	\$66,716.35	\$0.00	\$66,716.35	\$29,692.20	\$7,200.00	36,892.20	80.84%
5	<ul style="list-style-type: none"> • Lot#1Z • 0.343 acres 	\$74,770.00	\$0.00	\$74,770.00	\$24,840.06	\$7,200.00	32,040.06	133.36%
6	<ul style="list-style-type: none"> • Lot#1N • 0.350 acres 	\$60,932.00	\$0.00	\$60,932.00	\$25,347.00	\$7,200.00	32,547.00	87.21%
7	<ul style="list-style-type: none"> • Lot#1O • 3.575 Acres 	\$334,262.50	\$3,700.00	\$337,962.00	\$258,901.50	\$11,380.00	269,801.50	25.26%
8		\$74,120.00	\$28,730.00	\$102,850.00	\$24,622.80	\$36,410.00	60,552.80	69.85%

	<ul style="list-style-type: none">• Lot#1U• 0.34 Acres							
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Note: The names, addresses, telephone numbers and details of stakeholder identity have been removed to protect their privacy.

2 COMPENSATION

2.1. Compensation (Monetary vs In-Kind Replacement Assets)

This audit confirms that no households were or will be physically displaced as a result of the project. It also indicates that no replacement housing was offered by the Government of the Commonwealth of Dominica (GoCD), nor was this option required by the affected persons. Compensation has been provided solely in the form of cash, in accordance with the Commonwealth of Dominica Land Acquisition Act. The PAPs preferred cash compensation because they already have accommodations in other locations within Dominica, the Caribbean, and beyond.

Overall, past engagement focused on negotiating compensation for lands acquired (PAP #1-8), compensation for physical structures on the properties (PAP #1), and compensation for agricultural crops (PAP #2, 7, 8).

2.2. Fair and Prompt Cash Compensation

Given that land acquisition was premised on cash compensation, a fundamental WB OP 4.12 requirement is that all cash compensation must be both fair and prompt. Fairness under Laws of Dominica requires compensation to be based on Market Value (including a range of legal allowances and the option to request specific compensatory measures by the PAH/PAP) while OP 4.12 requires compensation to be at Full Replacement Value. Furthermore, prompt compensation means that all compensation must be paid fully prior to any construction works as part of ECRP.

The distinction between Market Value and Full Replacement Value noted above is important. WB OP 4.12 requires that Full Replacement Value must account for “output value for land or productive assets, or the undepreciated value of replacement material and labor for construction of structures or other fixed assets, plus transaction costs.”

Analysis of the Valuation Reports (GoCD), Private Valuations and Negotiation Agreement Documents – which are the statutory mechanisms for facilitating compensation and that form the basis for all compensation paid by GoCD – noted that cash compensation was based on replacement value for buildings (no depreciation applied (PAH#1)), government compensation rates for crops and rates above market value for agricultural land acquired for the project. This audit however noted the following:

- **Market Value for Land:**

The Valuation Reports have determined the value for all lands using Market Value as required under Laws of the Commonwealth of Dominica.

In determining the market value of one acre of agricultural land in Castle Bruce, a comparative analysis of registered land sales was conducted utilizing data obtained from the Government of the Commonwealth of Dominica (GoCD) spanning the years 2012 to 2024. This dataset includes thirty-two instances of registered land sales, with the analysis concentrating on the five highest-value transactions based on price per acre. Based on the data considered during the comparative analysis, the average value of 1 acre of agricultural land in Castle Bruce, Dominica, is \$57,506.04 XCD. To determine the market value the highest transaction value noted in the analysis, i.e. \$67,797.62 XCD, is rounded up to \$68,000.00 XCD and used to calculate the estimated market value, which will subsequently be used to determine the full replacement cost according to the World Bank’s OP 4.12. All the PAPs were compensated at rates above market value (ranging from 25.26%-133.36% higher than full replacement cost).

- **Compensation for Loss of Crops:**

Crop assessments conducted by Staff of the Division of Agriculture (DOA) serve as the basis of calculating the compensation for crops established on the respective properties included in the ECRP land acquisition process. Crop Assessments are conducted on properties of PAPs by Agricultural Extension Officers of DOA who report their findings to MoHUD and PVU through their Director.

With respect to prompt payment, this audit found that compensation for the properties were correctly calculated but has not been paid yet. The full compensation amounts should be paid prior to commencement of the construction phase of the project.

The following table highlights the differences between compensation at market value as per the Land Acquisition Act of Dominica and compensation at full replacement cost according to World Bank OP 4.12.

Table 11 Analysis – Market Value (Land Acquisition Act); Full Replacement Cost (WB OP 4.12)

Aspect	Compensation at Market Value – Land Acquisition Act	Compensation at Full Replacement Cost – WB OP 4.12
Definition	The amount a willing buyer would pay to a willing seller for the property.	The amount required to replace lost assets and cover transaction costs.
Land Value	Current market value of the land.	Current market value of the land.
Structures	Current market value, often depreciated.	Cost of materials, labor, permits, and fees to rebuild to original or improved condition (without depreciation).
Crops and Trees	Market value of the crops and trees at the time of displacement.	Market value of crops and trees.
Income Loss	Typically not included.	Compensation for loss of income during the transition period.
Transaction Costs	Not included.	Included (legal fees, registration fees, taxes).

Relocation Costs	Not included.	Included (transportation, temporary accommodation, utility installation).
Depreciation	Depreciation of structures and assets considered.	Depreciation not considered.
Objective	Reflects the current market rate.	Ensures no financial burden on displaced persons; they can replace and restore their pre-displacement standard of living.
Implementation	Based on standard market appraisal.	Based on thorough assessment of all costs to restore or replace the assets.

Of the eight (8) Negotiation Agreements for acquisition of land that have been signed by PAPs, eight (8) payments have been approved by GoCD but is pending disbursement to PAPs. The compensation amounts for crop losses to be paid to three PAPs suffering crop losses is still pending Cabinet approval.

Table 12 Summary of Compensation: Land and Physical Assets

Payment Valuation	Total	Outstanding Amount
Negotiation agreements	\$1,600,150.85	\$1,600,150.85
Compensation Paid	0.00	
Total Disbursements	0.00	

2.3. Replacement of Lost Property and Assets

Compensation for land and structures provided under the Land Acquisition Act of Dominica resulted in compensation amounts that are, 29.11%-201.02% higher than that which is required/stipulated by WB OP 4.12. OP 4.12 also includes consideration of legal fees amounting to 6.5% of the value of the land and/or structures purchased (Table 6).

To better understand the affected persons response and self-agency (i.e., their ability to self-organize and restore their living conditions and livelihoods without direct support from GoCD), the Perception Survey and Interview Program asked a series of questions on how affected persons plan to respond once compensation is paid.

Table 13 Assets Acquired/Planned Procurement by Affected Persons with their Compensation

Response	% of Surveyed Affected Persons
Buying Replacement Residential Land	12.5%
Buying Replacement Farmland	12.5%
Building Replacement Homes	0
Building New Ancillary Structures	25%
Establishing a New Business	12.5%
Buying Food/Crops/Drinks at the Markets	0
Buying Home Durable Goods	12.5%
Other	25% – Undecided

2.4. Livelihood Restoration Measures & Severely Impacted PAPs

No PAPs will be physically displaced as a result of the land acquisition process. Since none of the affected households derived income from the lands being acquired, the impact on their household income is zero. However, noting that three (3) PAPs (PAP #2, PAP #7, PAP#8) suffered loss of crops established on their respective properties at the time of the land acquisition there will be some economic displacement experienced by these PAPs since a source of food to their household would have been lost due to the project.

Hand-Holding and Monitoring Measures: Given that all PAPs are severely impacted, with more than 20% of their total land holdings being acquired for the project and having identified one elderly and one disabled PAP, hand-holding and monitoring measures are recommended instead of additional cash compensation. These measures include:

- **Routine Monitoring:** Assessments by HRP Social and Environmental Specialists, with reports on the quality of life of PAHs following receipt of compensation and for a duration of 1-2 years.
- **Increase Consultations and Information Dissemination:** Conduct comprehensive and ongoing consultations with Project-Affected Persons (PAPs) throughout the ARAP implementation process. This includes regular updates on project progress, compensation procedures, and available support services, ensuring PAPs are fully informed and involved in every step of the process.
- **Provide Guidance on Land Purchase and Financial Management:** Offer targeted guidance to PAPs on land purchase options and financial management, including advice on fixed deposit investments and other financial planning tools. This support should be tailored to the needs of PAPs, with special attention to those with limited financial literacy.
- **Monitor Post-Compensation Outcomes:** Establish a hand-holding and monitoring framework that tracks the well-being of PAPs for at least two (2) year following compensation receipt or at the end of the project cycle, whichever is shorter in duration. This includes regular check-ins, technical advice and mechanisms for addressing any grievances.

2.5. Gender & Vulnerable Groups

The audit confirmed that throughout the negotiation process, women were actively empowered to advocate for themselves, expressing their opinions freely and without

reservation. The audit also confirmed equitable treatment for both male and female PAPs, with no disparities noted.

Throughout the land acquisition process, elderly and disabled PAPs were given a clear understanding of their rights, the acquisition procedures, and the measures in place to mitigate any negative impacts on their livelihoods, socioeconomic standing, health, and well-being (hand holding and monitoring following compensation). This transparent approach ensured that all PAPs were fully informed and capable of making decisions that best suited their interests.

Elderly and disabled PAPs have expressed satisfaction with the compensation amounts negotiated. This once received shall provide them with a significant financial boost. The compensation shall empower them to fulfill personal goals, such as improving their living conditions, thereby enhancing their overall well-being.

For example, PAP #3, an elderly woman, negotiated total compensation of \$272,000 based on the Negotiation Agreement signed between her and GoCD. This amount was 33.21% above the sum of \$204,182.40 required by WB OP 4.12, reflecting a thorough consideration of her vulnerabilities.

Similarly, PAP #2, a disabled man, negotiated a total compensation of \$466,240 based on the Negotiation Agreement signed between him and GoCD. This amount exceeded the sum of \$245,466.60 mandated by WB OP 4.12 by 89.94%, demonstrating that his specific needs were also comprehensively addressed.

2.6. Stakeholder Engagement

WB OP 4.12 requires that affected persons are provided sufficient engagement, so they can understand the requirements and provisions of any land acquisition process. Formal engagement commenced as early as March 2023 in support of the Valuation Reports and the subsequent 2024 ARAP. In general, engagement was focused on obtaining land from PAPs through compulsory acquisition. Broadly speaking, the engagement is free and prior as required and GoCD/MoHUD appears to have undertaken these activities in line with WB policy.

The Perception Survey suggest that more than 80% of surveyed households (See Figure 3) were generally happy with the level of engagement, and there was good awareness of the land acquisition process and its provisions. This was supported during the interviews where affected persons stated that there was good support and information about the Project and the land acquisition process.

The only noted area of concern relates to timeliness of compensation once the negotiation process has been completed. Several interviewees claimed that the length

of time for compensation was too long and should be within three (3) to six (6) months following completion of negotiations. However, after consulting with legal experts and experienced social specialists, a timeframe of one (1) year is considered reasonable and most appropriate for completing payments for lands acquired through compulsory land acquisition.

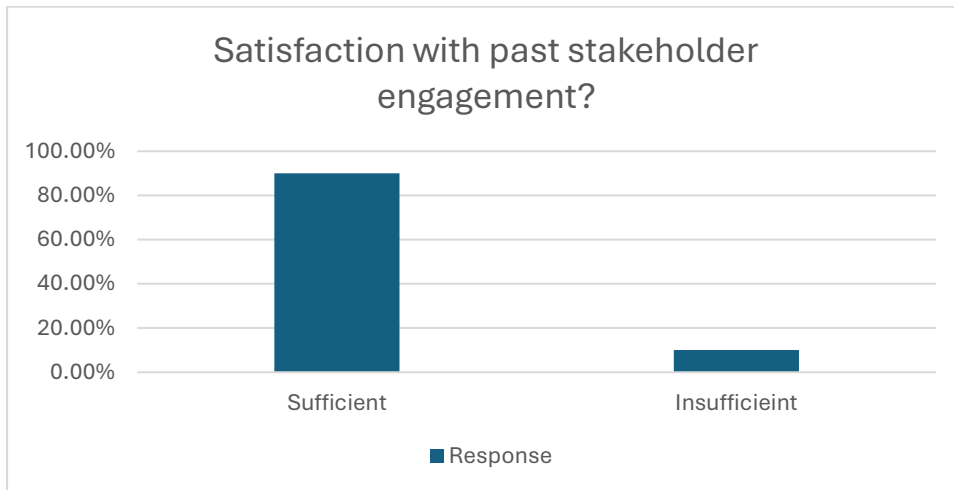


Figure 2: Satisfaction with Past Stakeholder Engagement (%)

2.7. ARAP Implementation Performance

Land acquisition and compensation process can be administratively demanding, and appropriate staffing and resourcing are important often across multiple organizations. MoHID, through its HRP - Project Implementation Unit, acted as the primary implementing agency with the mandate to manage the day-to-day requirements of the process.

2.8. Grievance Management

The 2024 ARAP makes detailed provision for the implementation of a Grievance and Redress Mechanism (GRM). More specifically this includes utilization of the HRP GRM during development and implementation of the ECRP.

Good practice requires that the GRM be fully functional as early as the point of preparing the valuations, so affected persons can review their compensation and raise a grievance related to any errors or omissions.

This audit found that, over time, there have been no grievances lodged by stakeholders regarding the land acquisition process of the ECRP.

The duties and functions of GRM management were the responsibility of the HRP Environmental and Social Safeguard Specialists.

2.9. Monitoring

The 2024 ARAP required that GoCD/MoHUD, or through the appointment of a suitable third-party, undertake regular monitoring and evaluation during the implementation of the land acquisition and compensation process. This audit found that monitoring has taken place to track the living standards of the affected PAPs.

Internal monitoring (through monthly reports) is presently undertaken by the HRP Social Safeguards Specialist.

3. CORRECTIVE ACTION PLAN

Considering the findings detailed throughout this Audit, it is recommended that the measures presented in Table - 14 be adopted to better align the existing compensation process with World Bank OP 4.12.

Table 14 Corrective Action Plan

No	Non-Compliance	Corrective Action(s)
1	Timeliness of compensation.	<ul style="list-style-type: none"> • Ensure that no work activity takes place on the properties acquired, prior to having provided compensation to PAPs. • Establish clear, enforceable timelines for each stage of the compensation process, from valuation to payment. • Monitor compliance with these timelines through regular audits and reporting.

In addition to the above recommendations some of the lessons learnt are summarized below:

- Proper application of the Land Acquisition Act of Dominica can ensure outcomes of the land acquisition process which are materially consistent with WB OP 4.12.
- Identification of lands without residential homes or physical structures is an effective means of mitigating involuntary resettlement and/or economic displacement as a result of housing development projects.
- When contemplating the allocation of lands to farmers as an incentive for increased production, GoCD may consider long-term lease agreements rather than offering state lands for sale at concessionary rates. These leases should include provisions reserving the state's right to repurpose the land, with sufficient notice provided to the leaseholder.
- Lesson learned regarding zoning and relocation planning, as well as land use policy and planning, include the importance of:
 - a. **Comprehensive Zoning:** Ensuring that relocation planning accounts for comprehensive zoning regulations to allocate suitable land for various purposes, including housing, infrastructure, and communal spaces as well as productive sector activities.
 - b. **Integration with Land Use Policy:** Aligning relocation plans with existing land use policies and planning frameworks to promote sustainable development and optimize land utilization.
 - c. **Community Engagement:** Involving affected communities in the zoning and relocation planning processes to ensure their needs and preferences are considered, fostering community ownership and support for the proposed changes.
 - d. **Risk Assessment:** Conducting thorough risk assessments to identify suitable relocation sites outside hazard-prone areas and mitigate potential risks associated with natural disasters or environmental hazards whilst maintaining alignment with zoning.
 - e. **Long-Term Planning:** Considering long-term implications of zoning decisions and relocation plans to promote resilience, sustainability, and socio-economic development in the relocated communities and within the national context.

4. CONCLUSION

The compensation process strictly adhered to the Dominica Land Acquisition Act, ensuring that all affected parties received fair and equitable treatment. However, our findings suggest that the process remains incomplete because the compensation amounts have not yet been disbursed to the PAPs. Once disbursement is completed, handholding (training, support) and monitoring measures are expected to commence.

Compensation under the Land Acquisition Act resulted in compensations amounts which are 25.26%-133.36% higher than the compensation stipulated by WB OP 4.12. This ensures that compensation more than adequately covers the loss of land, crops, structures, legal fees, and taxes, as well as vulnerability allowances for severely affected PAPs as well as one elderly and one disabled PAP.

Thus, adhering to the Land Acquisition Act of Dominica, there is no need for additional payments to PAPs beyond those established in the signed negotiation agreements and crop compensation as determined by DOA in order to fulfill the requirements of World Bank OP 4.12. Instead, training, support, and monitoring measures are recommended to ensure sustained improvement in the quality of life for PAPs.

5. REFERENCES

1. Government of the Commonwealth of Dominica. *Land Acquisition Act*. (Source GoCD)
2. World Bank. (2001). *Operational Policy (OP) 4.12: Involuntary Resettlement and Annex A: Involuntary Resettlement Instruments*. Retrieved from. Retrieved From [Operational Manual - OP 4.12 - Involuntary Resettlement \(worldbank.org\)](#)
3. World Bank. (2004). *Involuntary Resettlement Sourcebook: Planning and Implementation in Development Projects*. Washington, DC: World Bank. Retrieved from [Involuntary Resettlement Sourcebook: Planning and Implementation in ... - Google Books](#)

6. APPENDICES

- 6.1. Appendix A – Request for Information
- 6.2. Appendix B – Consolidated PAP List
- 6.3. Appendix C – Interview Guiding Questions
- 6.4. Appendix D - Survey Questionnaire
- 6.5. Appendix E – Record of Meetings
- 6.6 Appendix F - Records of land purchase by PAPs
- 6.7 Appendix G – Summary of Compensation Payments
- 6.8 Appendix I – Crop Assessments – PAH-HH # 2 ,7,8
- 6.9 Appendix J - Data – Registered Land Sales – Castle Bruce 2012-2024
- 6.10 Appendix K – Private Valuations by PAHs – Disseminated separately due to size.
- 6.11 Appendix L – Certificates of Title – PAHs – Disseminated separately due to size.

6.1. Appendix A – Request for Information

No.	Document Name	N/A	Status			Sourced
			None	Draft Doc	Final Doc	
1. Documentation						
1.1	Final ARAP Report			X	X	
1.2	Eligible Persons / Affected Persons List			X	X	
	Socio-Economic Survey Form / Raw Data			X	X	
1.3	Asset Inventories / Valuation Reports / Detailed Measurement Surveys			X	X	
1.4	Record of All Stakeholder Engagement (Minutes and Registers)			X		
1.5	Record of All Signed Offer Letters / Contracts			X	X	
1.6	Records of Compensation Payments (Transmittals, Signed Confirmation)					
1.7	Records of any Land / Property Handover Agreements			X	X	
1.8	Copy of the Grievance Mechanism / Procedure			X	X	
1.9	Detailed Record of Lodged Grievances			X	X	
1.10	Detailed Record of Corrective Actions	X				
1.11	ARAP Implementation Budget			X	X	
1.12	ARAP Monitoring & Audit Reports, Data or Records			X		

6.2. Appendix B – Consolidated PAP List

PAPNo.	Val. Number	Location	Displacement	
			Physical	Economic
1	<ul style="list-style-type: none"> • Lot#1V 0.5 acres 	Castle Bruce	No	No
2	<ul style="list-style-type: none"> • Lot#1Z 3.23 acres 	Castle Bruce	No	Yes
3	<ul style="list-style-type: none"> • Lot#1J 2.72 acres 	Castle Bruce	No	No
4	<ul style="list-style-type: none"> • Lot#1L 0.41 acres 	Castle Bruce	No	No
5	<ul style="list-style-type: none"> • Lot#1Z 0.343 acres 	Castle Bruce	No	No
6	<ul style="list-style-type: none"> • Lot#1N 0.350 acres 	Castle Bruce	No	No
7	<ul style="list-style-type: none"> • Lot#1O 3.575 Acres 	Castle Bruce	No	Yes
8	<ul style="list-style-type: none"> • Lot#1U 0.34 Acres 	Castle Bruce	No	Yes

Note: The names, addresses, telephone numbers and details of stakeholder identity have been removed to protect their privacy.

6.3. Appendix C – Interview Guiding Questions

No.	Interview Question	Response
1	MoHUD/HRP Environmental and Social Safeguards Specialists (PIU/ARAP Implementation Team)	
A	Please assist in the provision of details records/information/data need to support the Social Audit as per the Request for Information. (Photos or copies of the relevant hardcopies are to be made to append to the Social Audit Report, otherwise secure softcopies)	<ul style="list-style-type: none"> All data and documentation pertaining to the ECRP were sourced from the Property Valuation Unit, Lands and Surveys Division and MoHUD.
B	Please provide an overview of how the ARAP was developed, authorised by local authorities and the World Bank, and finally the implementation arrangements (This information should be sufficient to prepare a timeline of activities)	<ul style="list-style-type: none"> The ARAP was prepared in keeping with TOR provided by MoHUD with input from the Physical Planning Division and WB. Pure Blossom Life Essentials (PBLE) a local engineering firm was engaged by MoHUD to prepare the ARAP and other documents relating to environmental and social commitments in March 2024. The request for information, interview program and perception survey were completed from March-May 2024 The process of negotiations is complete with several PAPs already having received compensation.
C	What measures were put in place, to avoid/minimise the impacts of land acquisition and/or through project design during the planning of the projects?	<ul style="list-style-type: none"> This potential impact was mitigated during the process of selecting a relocation site for the beneficiaries of the ECRP. Of the four (4) locations considered, the selected site would illuminate the need for physical displacement due to project activities.
D	Where there any situations where there were PAPs with contested land ownership claims (such as squatters) or people that were generally not recognised by the local authorities and communities?	<ul style="list-style-type: none"> No.
E	Did the Project ever need to resort to forced evictions of PAPs – or the permanent or temporary removal against the will of persons without the provision of, and access to, appropriate forms of legal and other protections including OP 4.12?	<ul style="list-style-type: none"> No.
F	With respect to the loss of land, did the Project offer only cash or did it also offer replacement land as an option to PAPs? Please describe what the PAPs selected and if any problems were found during implementation with their choice.	<ul style="list-style-type: none"> Cash only.

G	With respect to the loss of land, please describe how replacement land (if any) was secured for PAPs. How many PAPs took this option and what problems were found during implementation with their choice.	<ul style="list-style-type: none"> • Replacement land was not offered.
H	With respect to the loss of residential/business/other structures, did the Project offer only cash or did it also offer replacement buildings as an option to PAPs? Please describe what the PAPs selected and if any problems were found during implementation with their choice.	<ul style="list-style-type: none"> • Cash only for PAPs. •
I	With respect to the loss of residential/business/other structures, did the Project build new replacement building on behalf of the PAPs, or was it up to PAPs to build their own new homes. Have PAPs already constructed their new homes or is this still being done.	<ul style="list-style-type: none"> • Cash only.
J	With respect to the payment of all cash compensation, were offer documents/contract provided to each PAP and were they signed and appropriately filed (secure copies of the contracts if available).	<ul style="list-style-type: none"> • Yes.
K	What is the status of the payment of compensation (i.e., it is complete, still underway), and are there any outstanding compensation payments? If yes, how many outstanding payments are there, and what is being done to resolve these outstanding payments?	<ul style="list-style-type: none"> • Compensation process is still underway.
L	Have there been instances where PAPs were required to give up their land or structures, prior to the payment of compensation, allowances, and provision of livelihood support? If yes, please explain in more detail what happened.	<ul style="list-style-type: none"> • No.
M	Please describe the livelihoods restoration programmes that were initiated during the implementation of the ARAP (including implementation agency, budget, type, beneficiary details and other relevant information).	<ul style="list-style-type: none"> • None Required: Compensation provided under the Land Acquisition Act of Dominica resulted in compensation amounts that are, 25.26-133.36% higher than the full replacement cost requirements stipulated by WB OP 4.12. Thus, having adhered to the Land Acquisition Act of Dominica, there is no need for additional payments to PAPs apart from the amounts contained in the negotiation agreement and the crop compensation assessment in order to fulfill the requirements of World Bank OP 4.12.
N	What is the status of the various livelihood restoration programmes (concluded, active, inactive) and what are the expected number of PAP beneficiaries for each programme?	<ul style="list-style-type: none"> • None Required: See 1 – M.
O	Does the Project have a list of vulnerable households, and please describe how these households were identified as vulnerable? (Obtain a copy of this list if available)	<ul style="list-style-type: none"> • Vulnerable PAPs (elderly and disabled) will receive adequate compensation to improve their quality of life. Hand holding and monitoring are recommended for a period of 1-2 years with support

		in the form of financial management training, encouraging PAPs to put a percentage of their compensation on a fixed deposit for a period of over 1 year and supporting PAPs seeking to purchase land.
P	Please describe the additional types of support provided to vulnerable households (including issues of gender, gender-based violence) during the implementation of the ARAP	<ul style="list-style-type: none"> • None: See 1 – O.
Q	Please provide a summary of the stakeholder engagement undertaken during the preparation of the ARAP, as well as during the implementation phase of the ARAP (obtain meeting records, minutes, and registers)	<ul style="list-style-type: none"> • Initial engagement was undertaken to disclose the project, need for relocation, and the valuation and compensation process. • PAPs were engaged to negotiate the required compensation rates. • PAPs were engaged to sign Negotiation Agreements subject to Cabinet Approval prior to receiving their compensation.
R	During the implementation phase of the ARAP did the Project setup a steering committee (or similar) or have means for PAPs to contact the Project directly (i.e., CLOs, phone number etc.)?	<ul style="list-style-type: none"> • Yes, a Technical Committee and a Community Committee were established by Cabinet through MoHUD.
S	Does the Project have a functional Grievance Mechanism, and please provide a record of all lodged grievances (including both closed and open grievances). Please provide a summary of what most of the grievances were about.	<ul style="list-style-type: none"> • Yes, HRP GRM. • At present, no grievances received pertaining to ECRP.
T	What monitoring, progress reporting and audits have been undertaken during the development and implementation of the ARAP (obtain copies of any monitoring data, reports, or audits).	<ul style="list-style-type: none"> • Ongoing Monitoring and Reporting by HRP E&S Specialists. • Ongoing Monitoring of ARAP, ESIA, ESMP, DRA and SA by MoHUD, Technical Committee and WB.
2	GBV/SEA Implementation Team (WB/HRP/Technical Committee)	
A	Does the Project have a Gender Plan (or similar) in place? (Obtain a copy of the Gender Plan and other relevant information) Please provide a summary of how gender plans and the ARAP collaborate.	<ul style="list-style-type: none"> • No.
B	Does the Gender Plan make any special provision for safeguarding women and women-headed households during the relocation and compensation process, or does it rely on the ARAPs or collaboration between the Gender and ARAP team?	<ul style="list-style-type: none"> • NA.
C	Are there any recorded incidents of Gender-Based-Violence or Sexual Abuse and Exploitation (GBV/SEA) that are directly related to the implementation of the land acquisition and compensation process?	<ul style="list-style-type: none"> • No.
D	Please provide your thoughts on any gender issues that were seen during the implementation of the land acquisition and compensation process, which were perhaps not recorded, or are not directly considered GBV/SEA, but may be general gender challenges.	<ul style="list-style-type: none"> • None.

E	With respect to the above gender issues, did the Gender the ARAP teams, put in any special measures to address these issues? If yes, please provide more detail on these measures.	<ul style="list-style-type: none"> • NA.
F	Does the team include a record of individual PAPs or Households where there were gender issues, or where they provided additional gender support? (Obtain a copy of the records if possible, or summarise them verbally)	<ul style="list-style-type: none"> • No grievances relating to gender issues/impacts were reported through the project GRM. Project stakeholders have not observed any gender related issues arising from the project.
G	Does the Project have a GBV-sensitive GRM in place, and was it available prior to the land acquisition process?	<ul style="list-style-type: none"> • Yes. • Yes.
H	Has the team received or seen any project-related grievances or general complaints that have a gender aspect (i.e., wife not being part of the consultation, women losing access to land and livelihoods, abuse of compensation etc.) (Obtain a copy of the grievance if possible, or summarize them verbally)	<ul style="list-style-type: none"> • No.
3	Relocation Grievance Committee – HRP/Community Committee	
A	Is the Relocation Grievance Committee fully functional and been available to PAPs during the implementation of the land acquisition process? If yes, please provide a summary of the functions, rules, and members of the committee	<ul style="list-style-type: none"> • Community Committee and Technical Committee are functional. • HRP GRM is functional and available to all stakeholders.
B	How are PAPs able to lodge a grievance with the committee (i.e., phone call, speaking to chief etc.)? Are PAPs able to approach GoCD/MoHUD/HRP or the World Bank directly?	<ul style="list-style-type: none"> • HRP GRM, digitally, via mobile device or through local authority.
C	Does the grievance committee have alternative means for women or vulnerable people to lodge a grievance, which is more sensitive to their needs? If yes, please provide a short summary of how this is done.	<ul style="list-style-type: none"> • No specific alternative means apart from HRP GRM.
D	Does the committee have a record of all grievances (including those that are open and closed) that have been reported to the committee? (Obtain a copy of the grievance records if possible, or summarise them verbally)	<ul style="list-style-type: none"> • No grievances have been filed thus far.
E	Please provide a quick summary of the types of grievances received by the committee, how serious the grievances were and how they were resolved. (Explore the various grievances and responses in follow-up questions)	<ul style="list-style-type: none"> • NA.
F	Have there been any serious grievances that needed to be escalated to (1) the courts, (2) GoCD/MoHUD/HRP, or (3) World Bank? If yes, please provide a summary of the grievance and why it was serious.	<ul style="list-style-type: none"> • No.

G	Are there any grievances that are outstanding or how not been fully resolved to the satisfaction of the PAP that made the grievance? If yes, please provide the records or summary of the outstanding grievances.	<ul style="list-style-type: none"> No.
Other	Any further issues of concern?	<ul style="list-style-type: none"> Timeliness of Payment
4	Municipal Valuers Office/ Property Valuation Unit	
A	Consistent with the law, was your office able to review and authorised the Valuation Reports that formed part of the ARAP? If yes, how did you find the quality of the reports and were they consistent with land acquisition law?	<ul style="list-style-type: none"> Yes. Yes.
B	Did the valuers determine the compensation rates included in the Valuation Reports, or did they request rates from your office? If the former, how did the valuer work out the compensation rates? If the latter, how did your office work out the compensation rates?	<ul style="list-style-type: none"> Valuations prepared on behalf of GoCD/MoHUD were prepared by Senior Valuation Offices of the PVU. Valuations prepared on behalf of PAPs were prepared by qualified personnel.
C	Were the final compensation rates based on market value (as required under national law) of full replacement value (as required by the World Bank standards). If it was market value, how different would the rates be from full replacement value.	<ul style="list-style-type: none"> In determining the market value of one acre of agricultural land in Castle Bruce, a comparative analysis of registered land sales was conducted utilizing data obtained from the Government of the Commonwealth of Dominica (GoCD) spanning the years 2012 to 2024. This dataset includes thirty-two instances of registered land sales, with the analysis concentrating on the five highest-value transactions based on price per acre. Based on the data considered during the comparative analysis, the average value of 1 acre of agricultural land in Castle Bruce, Dominica, is \$57,506.04 XCD. To determine the market value the highest transaction value noted in the analysis, i.e. \$67,797.62 XCD, is rounded up to \$68,000.00 XCD and used to calculate the estimated market value, which will subsequently be used to determine the full replacement cost according to the World Bank's OP 4.12. All the PAPs were compensated at rates above market value (25.26%-133.36%).
D	Did the Valuation Report include all the relevant allowances required under law (i.e., disruption allowance, rental allowance etc.)? If yes, do you feel that the allowances were fair and correct?	<ul style="list-style-type: none"> No such allowances were requested nor required.
E	It is understood that the Valuation Reports were prepared in 2023, and the compensation was paid in 2024. Is there any legislation or standard for the validity of the valuation reports, and where there are cases of delays, is there any additional compensation that must be provided to PAPs?	<ul style="list-style-type: none"> The standard period of one (1) year is common practice however this is not established in law. There was a delay in completion of crop assessments which in turn impacted the timeframe of completing negotiations.

F	Has your office been approached by a PAP to lodge a grievance on the compensation rates, or has your office heard of any such issues in the past? If yes, please provide a summary of the grievances.	<ul style="list-style-type: none"> No.
G	Other than reviewing and authorising the valuation reports, did your office provide any additional support to MoHUD/HRP in implementing the ARAP? If yes, please provide a short summary of the type of support that was provided.	<ul style="list-style-type: none"> The PVU is responsible for administration and implementation of the land acquisition processes under the laws of Dominica on behalf of GoCD.
5	Village Council and Village leaders – Castle Bruce	
A	Did the Village Council/Village leaders provide any kind of support to MoHUD/HRP during the development and implementation of the ARAP? If yes, please provide a summary of the type of support that was provided.	<ul style="list-style-type: none"> Yes, the Chairman, Clerk and Members of the VC contributed to the ARAP by providing information as required to guide PBLE consultants so as to obtain relevant data/information from PAPs and other relevant stakeholders for the ARAP an Social Audit.
B	Did the Village Council/Village leaders spend time with the PAPs in terms of getting their compensation, addressing any problems, or supporting the Project during stakeholder engagement? If yes, please provide a summary of the type of support that was provided to PAPs	<ul style="list-style-type: none"> The Village Council by virtue of inclusion of its members on the Community Committee were able to support the land acquisition process at all stages.
C	Does the Village Council/Village leaders feel that the PAPs have received fair compensation and they are largely happy, or has there been any unhappiness about the compensation? If no, what have PAPs been unhappy about?	<ul style="list-style-type: none"> Yes.
D	In cases where PAPs have been given cash for their land and structures, has the Village Council/Village leaders seen them using the money to buy replacement land and rebuild new structures, or do they feel money has gone elsewhere? If the latter, where do you think the PAPs are spending their money?	<ul style="list-style-type: none"> To be confirmed.
E	Has the Village Council/Village leaders seen any PAPs that have struggled to find replacement property, or rebuild their homes? If yes, please provide a summary of what they saw and what they think the problems were.	<ul style="list-style-type: none"> No.
F	Does the Village Council/Village leaders know of any situation where PAPs have still not been paid their compensation, or they have been incorrectly paid compensation and have lodged a grievance? If yes, please provide more details	<ul style="list-style-type: none"> The Village Council is aware of the status of payments to PAPs and will continue to play a key role on the Community Committee.
G	Did MoHUD/HRP provide sufficient and understandable engagement with your community before the land acquisition process started? Please describe what type of engagement they had with the Project. If the engagement was poor, please describe what can be done to make it better.	<ul style="list-style-type: none"> Yes. Engagement included field visits, face to face meetings, zoom consultations, community consultations, correspondences, telephone calls etc.

H	Is the Village Council/Village leaders aware of the Project grievance mechanism or are they aware of how a PAP can make a complaint if there is a problem with the Project or the compensation process.	<ul style="list-style-type: none"> • Yes.
I	Was there any situation where people were required to move off their property or give portions of their land to the Project before they were paid compensation?	<ul style="list-style-type: none"> • No.
J	Was there any situation where people were evicted without been provide fair compensation? If yes, please provide a summary of what happened.	<ul style="list-style-type: none"> • No.
K	Is the Village Council/Village leaders aware of any problems with vulnerable households or gender abuse that might have been a result of the land acquisition process? If yes, please provide more detail on the problems that you are aware of.	<ul style="list-style-type: none"> • Vulnerable PAPs (elderly and disabled) will receive adequate compensation to improve their quality of life. Hand holding and monitoring are recommended for a period of 1-2 years.
L	Is the Village Council/Village leaders aware of any community development / livelihood restoration programmes established by MoHUD/HRP to allow PAPs to improve their livelihoods? If yes, please provide a summary of the development activities put in place by MoHUD/HRP.	<ul style="list-style-type: none"> • Compensation provided under the Land Acquisition Act of Dominica resulted in compensation amounts that are, on average, 25.26-113.36% higher than the full replacement cost requirements stipulated by WB OP 4.12. • Thus, having adhered to the Land Acquisition Act of Dominica, there is no need for additional payments to PAPs apart from the amounts contained in the negotiation agreement and the crop compensation assessment in order to fulfill the requirements of World Bank OP 4.12.
M	If the Village Council/Village leaders is aware of any community development / livelihood restoration programmes, do they consider the programme to be successful in supporting local PAPs? Please provide detail on why you said yes/no.	<ul style="list-style-type: none"> • No: See 5 – L above.
	Village Leadership / Village Council	
6	Focus Group Discussion – PAP Women / Female-Headed Households – Castle Bruce	
A	Out of all the women attending, how many of their families have been 100% compensated?	<ul style="list-style-type: none"> • Three (3)
B	Out of all the women attending this meeting, how many of their families have been only partially compensated? If a person says they have not been given 100% compensation, please ask for consent to take their details (name and number) so we can investigate or ask for details on why they still have compensation outstanding.	<ul style="list-style-type: none"> • None.

C	<p>Out of all the women attending this meeting, how many of their families have not been compensated at all? If a person says they have not been given 100% compensation, please ask for consent to take their details (name and number) so we can investigate or ask for details on why they still have compensation outstanding.</p>	<ul style="list-style-type: none"> • None.
D	<p>Do the women know of any situations where, they personally or their neighbours have the following problems:</p> <ol style="list-style-type: none"> 1. Compensation is outstanding because the owner sold the land, died etc. 2. Any ongoing disputes in terms of property ownership or owner details since. 3. Any grievances where there are still outstanding compensation payments. 4. Any grievances where compensation payments are considered incorrect. 5. Any situations where people had to pay a tax, penalties, or fees 	<ul style="list-style-type: none"> • No.
E	<p>Do the women attending this meeting feel that there was sufficient engagement, and they received enough information on the compensation process?</p>	<ul style="list-style-type: none"> • Yes.
F	<p>Do the women attending this meeting know of the grievance mechanism, and do they know how to lodge a complaint/grievance? If yes, please describe how they would lodge a grievance.</p>	<ul style="list-style-type: none"> • Yes.
G	<p>Did any person at this meeting lodge a grievance or complaint during the land acquisition process? If yes, please ask them to provide a summary of the complaint and whether it was resolved.</p>	<ul style="list-style-type: none"> • No.
H	<p>Out of all the women attending this meeting how many took cash compensation, and how many chose to get replacement land and structures from the Government? (Do a hand count for each)</p>	<ul style="list-style-type: none"> • None.
I	<p>Out of all the women who selected cash compensation, has the compensation been sufficient to get new land and to rebuild their structures? If no, please explain why it has not been sufficient.</p>	<ul style="list-style-type: none"> • Yes.
J	<p>Out of all the women who selected cash compensation, did any of them struggle to get new land or rebuild them homes? If yes, what were the problems they encountered.</p>	<ul style="list-style-type: none"> • No.
K	<p>Are the women aware of any situation where people were required to move off their property or give portions of their land to the Project before they were paid compensation?</p>	<ul style="list-style-type: none"> • No.

L	Are the women aware of any situation where people were evicted without been provide fair compensation? If yes, please provide a summary of what happened.	<ul style="list-style-type: none"> No.
M	Are the women aware of any community development / livelihood restoration programmes established by GoCD/MoHUD to allow PAPs to improve their livelihoods? If yes, please provide a summary of the development activities put in place by GoCD/MoHUD.	<ul style="list-style-type: none"> No. See 5 – L.
N	Out of the women at this meeting, how many are part of a community development / livelihood restoration programs? (Do a hand count)? Of those that said yes, do they consider the programme to be successful in supporting local people? Please provide detail on why you said yes/no.	<ul style="list-style-type: none"> No. See 5 – L.
O	Do the women at this meeting know of or have witnessed any situation where female-headed households were affected? Was there any problem with these households' receiving compensation, or was there problems with husbands/family members? If yes, please provide a summary of what happened.	<ul style="list-style-type: none"> No.
P	Do women feel like they have been respected and included in the land acquisition process? Please provide detail on how they have / have not been included.	<ul style="list-style-type: none"> Yes.
7	Focus Group Discussion — PAP Men – Castle Bruce	
A	Out of all the men attending this meeting, how many of their families have been 100% compensated?	<ul style="list-style-type: none"> None.
B	Out of all the men attending this meeting, how many of their families have been only partially compensated? If a person says they have not been given 100% compensation, please ask for consent to take their details (name and number) so we can investigate or ask for details on why they still have compensation outstanding	<ul style="list-style-type: none"> None.
C	Out of all the men attending this meeting, how many of their families have not been compensated at all? If a person says they have not been given 100% compensation, please ask for consent to take their details (name and number) so we can investigate or ask for details on why they still have compensation outstanding.	<ul style="list-style-type: none"> Four (4)
D	Do the men know of any situations where, they personally or their neighbours have the following problems: 1. Compensation is outstanding because the owner sold the land, died etc.	<ul style="list-style-type: none"> No.

	<p>2. Any ongoing disputes in terms of property ownership or owner details since.</p> <p>3. Any grievances where there are still outstanding compensation payments.</p> <p>4. Any grievances where compensation payments are considered incorrect.</p> <p>5. Any situations where people had to pay a tax, penalties, or fees</p>	
E	Do the men attending this meeting feel that there was sufficient engagement, and they received enough information on the compensation process?	<ul style="list-style-type: none"> • Yes.
F	Do the men attending this meeting know of the grievance mechanism, and do they know how to lodge a complaint/grievance? If yes, please describe how they would lodge a grievance.	<ul style="list-style-type: none"> • Yes.
G	Did any person at this meeting lodge a grievance or complaint during the land acquisition process? If yes, please ask them to provide a summary of the complaint and whether it was resolved.	<ul style="list-style-type: none"> • No.
H	Out of all the men attending this meeting how many took cash compensation, and how many chose to get replacement land and structures from the Government? (Do a hand count for each)	<ul style="list-style-type: none"> • Cash only for impacted PAPs
I	Out of all the men who selected cash compensation, has the compensation been sufficient to get new land and to rebuild their structures? If no, please explain why it has not been sufficient.	<ul style="list-style-type: none"> • Yes.
J	Out of all the men how selected cash compensation, did any of them struggle to get new land or rebuild them homes? If yes, what were the problems they encountered.	<ul style="list-style-type: none"> • None.
K	Are the men aware of any situation where people were required to move off their property or give portions of their land to the Project before they were paid compensation?	<ul style="list-style-type: none"> • No.
L	Are the men aware of any situation where people were evicted without been provide fair compensation? If yes, please provide a summary of what happened.	<ul style="list-style-type: none"> • No.
M	Are the men aware of any community development/ livelihood restoration programmes established by GoCD/MoHUD to allow PAPs to improve their livelihoods? If yes, please provide a summary of the development activities put in place by GoCD/MoHUD.	<ul style="list-style-type: none"> • No: See 5 – L.
N	Out of the men at this meeting, how many are part of a community development / livelihood restoration programs? (Do a hand count)? Of those that said yes, do they consider the programme to be successful in supporting local people? Please provide detail on why you said yes/no.	<ul style="list-style-type: none"> • No: See 5 – L.

6.4. Appendix D - Survey Questionnaire

IMPACT / PERCEPTION SURVEY						
ID	PAP NAME					
No	Question	Yes	No	Do Not Know	No Comment	Comment
1	Did the household lose any of the following?					
	Residential Land					
	Farmland					
	Homes and Buildings					
	Ancillary structures (boundary walls, etc)					
	Business Structures					
	Crops					
	Trees					
	Graves					
	Other (Specify)					
2	Did the household ever receive a compensation agreement?					
3	Did the compensation payment match the agreement?					
4	Did the household ever lodge a complaint about a missing or incorrect payment?					
5	Did the household receive their compensation payment BEFORE they were required to move or hand-over their land to GoCD/MoHUD/HRP.					If no, please provide more detail:
6	Has your household already been paid?					
	All of Your Compensation					
	Only Part of Your Compensation					
	None of the Compensation					
7	Did your household select cash compensation for your loss of:					
	Residential Land					
	Farmland					
	Homes and Buildings					
	Ancillary structures (boundary walls, etc)					
	Business Structures					
	Crops					
	Trees					
	Graves					
	Other (Specify)					
8	Was the Cash compensation Spent On / What will the cash compensation be spent on?					

	Buying Replacement Residential Land					
	Buying Replacement Farmland					
	Building Replacement Homes					
	Building New Ancillary Structures					
	Establishing a New Business					
	Buying Food/Crops/Drinks at the Markets					
	Buying Home Durable Goods					
	Paying for Education/Health/Services					
	Funeral					
	Other (Specify)					
9	If the households have already replaced their lost assets with their cash, do they believe that there is an improvement in their:					
	Replacement Residential Land					
	Replacement Farmland					
	Replacement Homes					
	New Ancillary Structures					
	New Business					
	Other (Specify)					
10	If no, please provide an explanation of why the replacement assets are not as good as the assets you had before land acquisition?					
11	Did your household Receive Replacement Assets from GoCD for your loss of:					
	Residential Land / farmland					
	Farmland					
	Homes and Buildings					
	Ancillary structures (boundary walls, etc)					
	Business Structures					
	Other (Specify)					
12	Does your household believe that they received better replacement assets, covering:					
	Residential Land					
	Farmland					
	Homes and Buildings					
	Ancillary structures (boundary walls, etc)					
	Business Structures					
	Other (Specify)					
13	If no, please provide an explanation of why the replacement assets are not as good as the assets you had before land acquisition?					

14	Is/Was Your Household Part of Any Development / Livelihoods Programme including the following:					
	Cooperatives and Micro-Credit Schemes					
	Technical and Vocational Skill Training					
	Project Related Employment					
	Other (Specify)					
15	Does your household feel that your livelihoods have been restored after land acquisition, including:					
	Annual Crop Farming					If no, please explain why:
	Perennial and Tree Crop Farming					If no, please explain why:
	Livestock Rearing					If no, please explain why:
	Formal Business					If no, please explain why:
	Informal / Petty Trade					If no, please explain why:
	Formal Employment / Tourism					If no, please explain why:
	Other (Specify)					If no, please explain why:
16	Does the household feel that there was sufficient engagement, and they received enough information on the compensation process?					
17	Is the household aware of the Project complaints system / grievance mechanism?					
18	Did the household ever lodge a complaint / grievance with GoCD/HRP or local authorities.					
19	Do you have any other comments that the project should be aware of?					

6.5. Appendix E – Record of Stakeholders Engaged

Note: The names, addresses, telephone numbers and details of stakeholder identity have been removed to protect their privacy.

6.6 Appendix F - Record of land purchase by PAPs

PAP #	Lot/Parcel Code	Plot size	% of Plot size Acquired	Negotiation Agreement Total	Purchase Date (I -Inherited)	Purchased From (Inherited From)	Purchase Price Acre	2024 Market Price Per Acre (Agri.)
1	<ul style="list-style-type: none"> Lot#1V 0.5 acres 	0.5 acres	100	\$130,680.00	2010	-	\$80,000.00	\$68,000.00
2	<ul style="list-style-type: none"> Lot#1Z 3.23 acres 	3.23 acres	100	\$461,890.00	2002	GoCD	\$3,000.00	\$68,000.00
3	<ul style="list-style-type: none"> Lot#1J 2.72 acres 	2.72 acres	100	\$272,000.00		GoCD		\$68,000.00
4	<ul style="list-style-type: none"> Lot#1L 0.41 acres 	0.41 acres	100	\$66,716.35		GoCD		\$68,000.00
5	<ul style="list-style-type: none"> Lot#1Z 0.343 acres 	0.343 acres	100	\$74,770.00		-	NA	\$68,000.00
6	<ul style="list-style-type: none"> Lot#1N 0.350 acres 	0.350 acres	100	\$60,932.00		-	NA	\$68,000.00
7	<ul style="list-style-type: none"> Lot#1O 3.575 Acres 	3.575 Acres	100	\$334,262.50	2005	GoCD	\$3,000.00	\$68,000.00
8	<ul style="list-style-type: none"> Lot#1U 0.34 Acres 	0.34 Acres	100	\$74,120.00		-	NA	\$68,000.00

Note: The names, addresses, telephone numbers and details of stakeholder identity have been removed to protect their privacy.

6.7 Appendix G – Summary of Payments: (Land/Physical Assets/Legal Fees/Taxes/Fees/Crop Compensation/ Social Safeguards)

PAP#	Lot/Folio Number /Size	Negotiation Agreement Total	Payment Voucher No.	Payment Voucher Total	Payment Approval	Payment Disbursal
1	• Lot#1V 0.5 acres	174,680.00	077736	174,680.00	Y	N
2	• Lot#1Z 3.23 acres	461,890.00	077738	461,890.00	Y	N
3	• Lot#1J 2.72 acres	272,000.00	077735	272,000.00	Y	N
4	• Lot#1L 0.41 acres	66,716.35	077742	66,176.35	Y	N
5	• Lot#1Z 0.343 acres	74,770.00	077763	74,770.00	Y	N
6	• Lot#1N 0.350 acres	60,932.00	077744	60,932.00	Y	N
7	• Lot#1O 3.575 Acres	334,262.50	078162	334,262.50	Y	N
8	• Lot#1U 0.34 Acres	74,120.00	078175	74,120.00	Y	N

Note: The names, addresses, telephone numbers and details of stakeholder identity have been removed to protect their privacy.

6.8 Appendix I – Division of Agriculture: Assessment of Economic Crops/Trees

Note: The names, addresses, telephone numbers and details of stakeholder identity have been removed to protect their privacy.

6.8 Appendix J – DATA – REGISTERED LAND SALES – CASTLE BRUCE 2012-2024 (Source GoCD)

Note: The names, addresses, telephone numbers and details of stakeholder identity have been removed to protect their privacy.

