



**Food and Agriculture  
Organization of the  
United Nations**

## **FISH-ADAPT: Transforming climate resilience and sustainability in Saint Lucia's fisheries communities**

GCP/STL/023/GCF

### **Annex 12 - Environmental and Social Action Plan (ESAP)**

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## Abbreviations

<b>CBD</b>	Convention on Biological Diversity
<b>CEDAW</b>	Convention on the Elimination of All Forms of Discrimination Against Women
<b>CESCR</b>	International Covenant on Economic, Social and Cultural Rights
<b>CRC</b>	Convention on the Rights of the Child
<b>EEZ</b>	Exclusive Economic Zone
<b>ESAP</b>	Environmental and Social Action Plan
<b>ESOP</b>	Environmental and social operational pillars
<b>ESS</b>	Environmental and Social Safeguards

<b>FAO</b>	Food and Agriculture Organization
<b>FESM</b>	Framework for Environmental and Social Management
<b>GAAP</b>	Gender Assessment Action Plan
<b>GBV</b>	Gender-based violence
<b>GCF</b>	Green Climate Fund
<b>ILO</b>	International Labour Organization
<b>IRM</b>	Independent Redress Mechanism
<b>LGBTQ</b>	Lesbian, Gay, Bisexual, Transgender and Queer
<b>NAP</b>	National Adaptation Plan
<b>NEMO</b>	National Emergency Management Organisation
<b>OHS</b>	Occupational health and safety
<b>OiG</b>	Office of the Inspector General
<b>PMU</b>	Project Management Unit
<b>PSC</b>	Project Steering Committee
<b>PSEA</b>	Prevention of Sexual Exploitation and Abuse
<b>PWDs</b>	People with disabilities
<b>SEAH</b>	Sexual Exploitation, Abuse, and Harassment
<b>SEP</b>	Stakeholder Engagement Plan
<b>SLNT</b>	Saint Lucia National Trust
<b>SLUSWMA</b>	Saint Lucia Solid Waste Management Authority
<b>UNFCCC</b>	United Nations Framework Convention on Climate Change

## Annex 12 Environmental and Social Action Plan

### 1. Introduction

The Environmental and Social Action Plan (ESAP) is a key tool for managing environmental and social risks in the FISH-ADAPT: Transforming Climate Resilience and Sustainability in Saint Lucia's Fisheries Communities project. It ensures compliance with FAO's Framework for Environmental and Social Management (FESM) by identifying, assessing, and mitigating potential adverse impacts.

The ESAP outlines specific corrective and preventive actions to address identified risks, ensuring the project meets essential environmental and social standards. It also establishes a clear framework for tracking progress, setting timelines, and defining responsibilities, promoting transparency and compliance. Additionally, the ESAP fosters community engagement by encouraging consultation and participation, ensuring that local concerns are integrated into project planning.

As an integral part of the Funding Proposal, the ESAP must be monitored and reported on throughout project implementation.

### 2. Environmental and social safeguards legal framework

Saint Lucia has a comprehensive legal and institutional framework for environmental protection and social safeguards. Key institutions and legislation regulate waste management, disaster preparedness, heritage conservation, fisheries, and climate resilience, ensuring that national policies align with both domestic and international obligations.

#### Key Institutions

The Saint Lucia Solid Waste Management Authority (SLUSWMA) was established under the Waste Management Act No. 20 of 1996 (Government of Saint Lucia, 2008a). It is responsible for managing sanitary landfills, hazardous waste treatment, resource recovery systems, and public education on waste management (SLUSWMA, n.d.). Another key institution, the National Emergency Management Organisation (NEMO), operates under the Emergency Powers Act (1995) and the Disaster Management Act (2006). It oversees disaster preparedness and response coordination, ensuring the country's resilience to natural disasters (Government of Saint Lucia, 2007).

The Saint Lucia National Trust (SLNT) was created in 1975 to conserve the country's natural and cultural heritage. It manages significant protected areas such as Pigeon Island National Landmark, Maria Islands Nature Reserve, and the Pointe Sable Environmental Protection Area (Saint Lucia National Trust, n.d.). Meanwhile, the Department of Fisheries operates under the Fisheries Act No. 10 of 1984 and its revised regulations. This foundational legislation governs the management and development of fisheries within Saint Lucia's waters, encompassing the Exclusive Economic Zone (EEZ), territorial sea, and internal waters. The Act addresses various aspects, including development and management plans for fisheries, establishment of the Fisheries Advisory Committee, licensing for both foreign and local fishing vessels, regulation of fish processing establishments, creation of marine reserves and implementation of conservation measures, and provisions for aquaculture development (Government of St. Lucia, 2008b; CANARI, 2021). The department also handles licensing and registration of fishers and the licensing of fishing vessels. The department's mission is to provide effective and efficient services that promote the sustainable development of Saint Lucia's fisheries through participatory management and responsible use of fishery resources.

#### Policy Framework

Saint Lucia has established a comprehensive institutional framework, supported by policies, laws, and regulations, to promote sustainable and climate-resilient fisheries and aquaculture sectors.

Saint Lucia has developed several national policies and strategic plans to strengthen environmental management and climate resilience. These include the Climate Change Adaptation Policy (2015), the National Water Policy (2004), the National Wastewater Policy and Strategic Plan (2017, awaiting adoption), and the National Environmental Policy & Management Strategy (2005, revised in 2014). Other key frameworks include the National Land Policy (2007, revised draft 2017), the National Biodiversity Strategy and Action Plan (under review), and the Strategic Programme for Climate Resilience (2011).<sup>1</sup> These policies and plans provide a structured approach to environmental governance, integrating sustainability into development strategies.

The legal framework supporting environmental safeguards includes key legislation such as the Beach Protection Act (1967, amended 1987), the Maritime Areas Act (1984), the Fisheries Regulations No. 9 (1994), the Tourism Incentives Act (2005), and the Tourism Industry Development Act (1982). These laws regulate coastal and marine resources, tourism activities, and environmental conservation, ensuring balanced and sustainable use of natural resources.

The National Fisheries Policy Statement emphasizes the importance of sustainable fisheries for economic development. The fisheries management strategy includes stock assessments, fishing effort analysis, habitat protection, and regulatory measures such as capture limits and closed seasons. Collaboration with regional and international organizations ensures that fisheries management aligns with best practices. Additionally, the government recognizes the need for business development support for fishers and cooperatives, facilitating access to financial services and improving economic resilience within the sector.

Another key policy is the National Adaptation Plan (NAP) 2018–2028, which outlines Saint Lucia's approach to building climate resilience across multiple sectors, including fisheries and aquaculture. It emphasizes integration of climate change adaptation into national and sectoral decision-making processes, enhancement of institutional capacities to support climate-resilient practices, promotion of ecosystem-based adaptation solutions for sustainable management of terrestrial, coastal, and marine resources, and engagement of the private sector and civil society in adaptation efforts. The plan serves as a roadmap for implementing climate-resilient strategies in the fisheries sector, ensuring food and income security in the face of changing climatic conditions.

Saint Lucia has also established policies addressing social safeguards, labor rights, occupational health and safety (OHS), and gender inclusion in fisheries and aquaculture. The national Labor Code provides regulations on employment conditions, fair wages, workplace safety, and social protections. The Occupational Health and Safety Policy 2017 (Government of Saint Lucia, 2017) establishes workplace safety standards across industries. There is no Gender Policy or National Strategic Action Plan on Gender Based Violence, although work was being done to address these gaps before the Covid-19 pandemic broke out (UN Women, n.d.). Gaps also exist in data collection on gender-disaggregated labor contributions, limiting the ability to design targeted interventions (World Bank, 2023). Additionally, the Domestic Violence Act (2005) and the Criminal Code provisions on sexual offenses provide legal protections against gender-based violence (GBV) and sexual exploitation, abuse, and harassment (SEAH). Awareness and enforcement challenges persist, particularly in male-dominated sectors such as fisheries. Integrating GBV/SEAH safeguards into fisheries and aquaculture policies is key to ensure safe and inclusive working environments.

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<sup>1</sup> See Annex 2\_Feasibility Study for a full overview.

### Key international commitments

Saint Lucia is also a signatory to numerous international environmental and social agreements, reinforcing its commitment to sustainable development and environmental protection. The country is a party to the United Nations Framework Convention on Climate Change (UNFCCC), including the Kyoto Protocol and the Paris Agreement, with national implementation guided by the Climate Change Act No. 3 of 2024 (Government of Saint Lucia, 2024). Additionally, the island is committed to the Convention on Biological Diversity (CBD), which ensures the sustainable use and conservation of biodiversity. In 2020, Saint Lucia ratified the Escazú Agreement, a regional treaty emphasizing access to environmental information, public participation, and justice in environmental matters (ECLAC, 2023).

Saint Lucia has also ratified key International Labour Organization (ILO) conventions the ILO Forced Labour Convention, the Equal Remuneration Convention, the Discrimination (Employment and Occupation) Convention, and the Occupational Safety and Health Convention, reinforcing protections for workers in fisheries and aquaculture (ILO, 2024). As part of its commitment to human rights, Saint Lucia is a signatory to the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), the International Covenant on Economic, Social and Cultural Rights (CESCR), and the Convention on the Rights of the Child (CRC) (OHCHR, n.d.). These frameworks promote gender equality, labor protections, and social inclusion in fisheries and other sectors. However, implementation gaps remain, particularly in monitoring labor rights in small-scale fisheries and ensuring compliance with OHS standards in hazardous working conditions (World Bank, 2023). In addition, barriers such as limited access to credit for women fishers and aquaculture farmers, as well as persistent informal employment practices, continue to hinder full implementation (CCRIF, 2020).

In summary, Saint Lucia commitments are reflected both in their international commitments and in national policies and legislative frameworks, ensuring that environmental and social safeguards align with international standards. Through its legal and institutional structures, the island integrates environmental sustainability, climate resilience, and economic security into its development strategies. However, gaps in enforcement, data availability, and financial resources present challenges to fully realizing these commitments, particularly in labor rights, gender inclusion, and OHS standards in the fisheries sector. Addressing these gaps will be critical to ensuring long-term sustainability and resilience.

### 3. Screening, categorization and analysis of results

FAO's Framework for Environmental and Social Management (FESM, 2022) establishes two environmental and social operational pillars (ESOP) which set the principles and mechanisms to effectively screen and manage risks and potential impacts. These ESOPs established the methodology used to screen, categorize and assess the risks.

- ESOP 1 – Screening, assessment and management of environmental, climate and social risks and impacts; and
- ESOP 2 – Stakeholder engagement, information disclosure, and grievance, conflict resolution and accountability mechanisms.

This Annex 12 fulfills the requirement of ESOP 1. ESOP 2 is covered via the actions specified in:

- Annex 2c – Summary of consultations and stakeholder engagement plan, and
- This Annex 12 – includes a description of the grievance mechanism (including SEAH) and conflict resolution process (further considerations can also be found in Annex 4 – Gender Analysis and Action Plan)

Table 1 Environmental and social risk screening

	YES	NO
Will the activities involve associated facilities or generate cumulative impacts that would require further detailed due diligence and management planning?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The project encourages the development of value chain activities that diversify livelihoods in the fisheries sector. These small-scale activities are not expected to generate cumulative impacts that would require further detailed due diligence and management planning.		
Will the activities involve transboundary impacts including those that would require further due diligence and notification to affected states?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The project activities will encourage increased fishing outside Saint Lucia's EEZ to reduce pressure on coastal fisheries and help stabilize incomes in the context of a changing climate. The project activities include increased monitoring of fish catch and measures to eliminate ghost fishing and by-catch. The project activities support increased participation by the Government of Saint Lucia in regional / international fisheries management bodies.		
Will the activities adversely affect working conditions and health and safety of workers or potentially employ vulnerable categories of workers including women and children?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The project activities will improve safety at sea for fishers and improve safety and hygiene at fish processing facilities. The project activities will not adversely affect working conditions and the health and safety of workers. The project will improve working conditions and create new opportunities for vulnerable categories of workers including women and older people. The project activities will not involve child labor.		
Will the activities potentially generate hazardous waste and pollutants including pesticides and contaminate lands that would require further studies on management, minimization and control and compliance to the country and applicable international environmental quality standards?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The project activities will not generate hazardous waste and pollutants including pesticides or contaminate land. Fish farming will take place via inland freshwater ponds and aquaponics tanks and will not impact marine systems. The project activities will reduce pollution from improper disposal of fish waste and runoff from upstream construction and agricultural activities.		
Will the activities involve the construction, maintenance, and rehabilitation of critical infrastructure (like dams, water impoundments, coastal and riverbank infrastructure) that would require further technical assessment and safety studies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The project will rehabilitate and upgrade existing small-scale fish landing site facilities such as wooden piers and boat ramps, to reduce exposure and vulnerability to flooding, storms and wave action. As part of the ESAP, the project will require detailed assessments, stakeholder consultation and ESAs to be completed before any construction, maintenance, or rehabilitation work. The project will undertake riparian revegetation activities and other nature-based adaptation solutions to diminish silting and erosion downstream.		
Will the proposed activities potentially involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The project activities will not involve resettlement and dispossession, land acquisition, or economic displacement of persons and communities.		

Will the activities be located in protected areas and areas of ecological significance including critical habitats, key biodiversity areas, and internationally recognized conservation sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The project activities are intended to protect and rehabilitate degraded coastal mangrove and coral reef sites. Proposed activities include removal of sargassum (algae) blooms, upstream management measures to reduce siltation and fertilizer runoff. Activities are anticipated to have <u>positive</u> environmental and ecological impacts. No negative impacts on protected areas and areas of ecological significance are anticipated.		
Will the activities affect Indigenous Peoples (IPs) that would require further due diligence, free, prior, and informed consent (FPIC) and development of inclusion and development plans?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Government of Saint Lucia does not indicate awareness or recognition of Indigenous Peoples. The only reference to indigenous presence comes from the Minority Rights Group, which states: "A small Carib (Kalinago) population is mainly centered in the Choiseul region but also resides in other towns along the western coast." However, this has not been corroborated by additional sources. During stakeholder consultations, no individuals or groups identified as indigenous, and all efforts to confirm the presence of Kalinago communities in the target areas have returned responses of either "no" or "no available information." Since Choiseul is the only potential area mentioned for Kalinago presence, the project formulation team conducted a consultation in Choiseul in October 2024. The consultation concluded that there was no presence of Indigenous Communities in Choiseul.		
Will the activities be located in areas that are considered to have archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values or contain features considered as critical cultural heritage?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The project activities will take place at existing fish landing sites and other existing locations used by Saint Lucia's fisheries sector. The project has not identified any features considered as critical cultural heritage at these sites.		

\*Full screening checklist is annexed to this document.

#### Confirmation of Category C project

The project has been screened using the FAOs risk screening tool (FESM, 2022), resulting in an ESS risk categorization of the project as Category C: Activities with minimal or no adverse environmental and/or social risks and/or impacts.

The activities envisioned by the proposed project include only activities that have minimal or no expected environmental and/or social risks and impacts.

Specifically, the project will finance:

- Capacity building to ensure national and local stakeholders are able to design and implement climate change adaptation solutions in the fisheries sector
- Rehabilitation and recovery of ecosystems including mangroves and coral reefs through nature-based solutions
- Rehabilitation of fisheries landing sites to increase their resilience to climate change threats such as storm surges and flooding
- Technical assistance and training
- Improving access to sustainable financial mechanisms
- Outreach and awareness raising.



The project activities are in line with the GCF guidance for category C “Small-scale facilities, smallholder production and community-based conservation, rehabilitation and maintenance of existing small-scale infrastructure within an already built-up area and with no additional footprint”.

The rehabilitation of the fisheries landing sites in Saint Lucia envisioned in this project are considered to be undertaken within an already built environment as some of the existing and dysfunctional hard structures may be retrofitted or adapted as part of this effort to achieve both vulnerability reduction and regeneration of natural features. These activities do not involve physical and economic displacement of people and pose no negative risks on the environment and social aspects of the population.

Although the project preliminary screening based on FAO’s screening checklist indicated potential of moderate risks under two outputs (Component 2 – Output 2.1 involving ecosystem restoration work (mangroves and coral reefs) in protected areas, with potential environmental risks; and Component 1 – Output 1.3 involving aquaculture development, with potential social risks for access of natural resources by secondary users), further project specific assessment and analysis found that the activities were both limited in scope and unlikely, leading to a reclassification of these outputs as Low Risk. The further assessment utilized the FAO’s most up to date Framework for Environmental and Social Management (2022) which provides a more detailed analysis of risk.

For activities in protected areas, the project will conduct site-specific environmental and social assessments (ESAs) before any work begins. If in any case the ESAs identify risks beyond Category C, the interventions will be altered or removed. Restoration activities will rely on natural regeneration and low-impact techniques, minimizing potential disturbances to the ecosystems. Local communities will be engaged throughout the process, ensuring their participation and support. The overall impact is expected to be positive, and the outcome will result in strengthened coastal ecosystem services and improving the health of these critical habitats, with biodiversity co-benefits.

For aquaculture development, the project has established clear criteria for beneficiary selection, including land tenure verification which will be done through proof of ownership or a valid government lease. This process will help prevent potential conflicts over land use. ESAs will be conducted to identify and address any potential effects on secondary land users, and the project will continuously engage with stakeholders in accordance with ESOP 2. To further mitigate risks, activities will be restricted to privately owned lands or those leased to the Government of Saint Lucia, ensuring that land rights are respected, and potential displacement is avoided.

The mitigation measures are expected to effectively minimize potential adverse impacts.

The adaptation measures promoted by the project will provide long term benefits to the most vulnerable fisherfolk and aquaculturists and are further outlined and detailed in the Feasibility study, Annex 2.

Given these considerations FAO confirms the classification as a Category C project. The project remains aligned with GCF guidance for Category C projects, emphasizing small-scale, community-based conservation and rehabilitation efforts with minimal environmental and social impacts.

Annex 7 of the full proposal details a broader risk assessment, and Annex 4 specifically targets the gender risks of the project.

#### 4. Environmental and Social Action Plan

Table 2 Environmental and Social Action Plan

Summary of risks	Mitigation measures	Risk significance	Responsible party/person	Schedule	Expected results	Cost/Budget
<i>This contains the description of risks and can be derived from the responses to the screening questions in Part B2.</i>	<i>Options to avoid, reduce, mitigate risks and impacts. This may also indicate additional due diligence and specific management plans</i>	<i>This contains a description of the overall level of risk*</i>	<i>Individual person, unit, or entity tasked to carry out the mitigation measures</i>	<i>Timing of implementation of measures including any additional due diligence and management plans and may depend on the stage of implementation</i>	<i>Expected outputs of the measures</i>	<i>Estimated cost of carrying out the measures</i>
Transboundary impacts from increased fishing outside Saint Lucia's EEZ – risk of increased pressure on Eastern Caribbean tuna stocks	Project activities include increased monitoring of fish catch and measures to reduce by-catch, ghost fishing, and harvesting of undersized fish (2.1.3).  Project activities include support for increased Government of Saint Lucia engagement in international / regional bodies such as OECS, CARICOM and WECAFC regional fisheries management initiatives, and support for Saint	Low – Saint Lucia's pelagic fishing activities represent approximately 1-2% of the regional yellowfin tuna catch and trade in the region. Unsustainable fisheries expansion on specific species is unlikely to take place by fishers from St Lucia, as	Department of Fisheries	Weekly data collection at fish landing sites	Improved information on species and tonnage of fish catch, compiled to generate improved information on health of the stocks and sustainability of the fisheries resources.	Budget for Activities 2.1.3 + 4.1.2: USD 348,728

Summary of risks	Mitigation measures	Risk significance	Responsible party/person	Schedule	Expected results	Cost/Budget
	Lucia at ICCAT for the advancement of the offshore pelagic fishery. (4.1.2) The regional fishery bodies do the regional stock assessments for the targeted fish species, train fisheries managers and fish stock researchers, and invest increasingly in monitoring and observer programmes.	the catch capacity of the fleet is and will remain very small compared to the fleet capacity of the large fishing countries in the region (e.g. USA, Mexico, Cuba, Venezuela).				
Environmental impacts from maintenance, rehabilitation and upgrading of fish landing site and fish processing infrastructure to improve climate resilience	Project activities include stakeholder consultation and detailed ESA (1.2.4) and consideration of lower-impact alternatives for each site prior to construction activities. Specific mitigation measures will include waste management plans to minimize construction and operational waste, scheduling construction to avoid critical breeding seasons, and implementing erosion control measures to reduce habitat	Low – targeted infrastructure is small scale involves in-situ rehabilitation, upgrading and maintenance. There are widely known and readily available good practices that can be used to address potential impacts, and the beneficiaries and implementing partners for the	Physical Planning Section, Ministry of Physical Development	Submission of ESA as part of the planning application for site improvements	Upgrading and climate-proofing of fish landing sites with minimal negative environmental impact	Budget for Activities 1.2.4 + 2.1.1 + 2.1.2: USD 5,070,691

Summary of risks	Mitigation measures	Risk significance	Responsible party/person	Schedule	Expected results	Cost/Budget
	disturbance. Additionally, rehabilitation and upgrades will incorporate energy-efficient equipment, sustainable building materials, and improved wastewater treatment systems to reduce environmental impacts. Project activities include support for Nature-based Solutions (NbS) (2.1.1, 2.1.2) with long-term adaptive management plans to minimize environmental impacts.	project have a track record of applying these good practices.				
Environmental impacts from activities in protected areas and areas of ecological significance	Project will conduct site-specific environmental and social assessments (1.2.4) to ensure compliance with Cat C rating. Use of native species and biosecurity controls will be ensured, thereby preventing the introduction of invasive species or diseases, and establishing long-term maintenance and monitoring plans with local community	Low –Activities are in protected areas but limited in scope. Project activities are designed to identify and mitigate activities and hazards that contribute to degradation of critical mangrove and coral reef ecosystems. Project activities	Department of Fisheries	Bi-annual monitoring and progress reports	Improved health and regrowth of degraded mangrove and coral reef sites	

Summary of risks	Mitigation measures	Risk significance	Responsible party/person	Schedule	Expected results	Cost/Budget
	involvement. Project activities include protection and restoration of mangrove ecosystems (2.1.1). Project activities include protection and restoration of coral reef ecosystems (2.1.1). Activities are designed to understand and address causes of degradation, including eutrophication of sargassum and pollution from upstream soil and nutrient runoff (2.1.2).	will complement existing / ongoing protection and restoration initiatives. The overall impact of project activities is expected to be <u>positive</u> .				
Social impacts from activities that may affect access to natural resources for aquaculture development	The project will establish criteria for beneficiaries to receive project support for aquaculture farms, including clarity on land tenure (1.3.1). The project will ensure activities are on privately owned lands or lands leased to the GoSL ESAs will assess potential impacts on other land users (1.2.4).	Low - Potential for impacts on current land users exist but are limited in scope and unlikely. Clear criteria for beneficiary selection and land tenure verification will be in place. The project will not engage with anyone who do	Department of Fisheries	Submission of ESA as part of the planning application for site improvements, as well as stakeholder engagement processes	Clear land tenure for improved, climate-resilient aquaculture activities with minimal impact on other land users	Budget for Activities 1.3.1 + 1.2.4: USD 6,130,195

Summary of risks	Mitigation measures	Risk significance	Responsible party/person	Schedule	Expected results	Cost/Budget
		not have the right to the land. Stakeholder engagement and assessments will be conducted and are an additional mitigating measure in that regard.				
Social impacts due to occupational health and safety risks for workers and community members involved in NbS implementation and construction activities at landing sites	The project will provide capacity building to community members on safely maintaining NbS (1.2.4). The project will also engage specialized construction firms for small engineering retrofitting and nature-based works and will require contractors to comply with high Occupational Safety and Health standards guided by the ILO standards on OSH (e.g. PPE and first aid training).	Low – Activities are limited to very small scale within landing sites and close proximity. Comprehensive training and safety measures will be put in place, and specialized firms will require compliance with high OSH standards.	Physical Planning Section, Ministry of Physical Development	Safety training conducted before any work begins; Bi-annual monitoring and progress reports	Safe working conditions for all project activities with minimal occupational hazards, ensuring positive social outcomes	Budget for Activity 1.2.4: USD 4,072,961

*\*Risk significance. The probability of occurrence is the likelihood for a risk to occur and can be characterized in terms of the degree to which it will happen (for example, the UNDP screening procedure uses “expected, highly likely, moderately likely, not likely, and slight”). The impact or magnitude of risks is the description of how severe the impacts would be if it were to occur (for example, “critical, severe, moderate, minor, and negligible”). A*

*significant value of the risk (for example low, medium, high) can be obtained by combining the probability and impact values. The risk significance indicates the relationship between probability and severity or magnitude of impacts. The entities or organizations that will be implementing the proposed activities are best positioned to define the probability of occurrence and severity or magnitude of impacts.*

*There is no single technique to determine the significance of risks, nor will it apply in all situations. The entities and organizations that will be implementing the activities will need to determine which technique will work best for each situation. Determining risk significance would require an understanding of activities and locations, the urgency of situations, and objective judgment.*

## 5. Implementation arrangements

In accordance with the Accredited Entity's FAO Framework for Environmental and Social Management, the project environmental and social action plan includes key elements of a human-rights based approach and applies a risk-informed approach for addressing environmental and social risks and impacts. The project goes beyond a "do no harm" approach and implements active measures to deliver social and environmental improvement in support of FAO's vision for sustainable agrifood systems.

The ESAP follows the following principles:

- Leave no one behind – prioritizing and explicitly designing interventions that explicitly address the needs and rights of people who are marginalized, vulnerable, or disadvantaged;
- Human rights-based approach – ensures all phases of programming are based on the human rights standards contained in, and the principles derived from, the Universal Declaration of Human Rights and other international human rights instruments;
- Free, prior, and informed consent – allowing Indigenous Peoples to give or withhold consent at any stage throughout a programme or project that may impact them or their territories;
- Preventions of sexual exploitation, abuse, and harassment – enforcing a zero-tolerance approach to sexual exploitation, abuse and harassment and addressing any risk of potential exposure of affected people to gender-based violence (GBV) and other abuse;
- Sustainability and resilience – considering social, economic, and environmental factors to ensure the effectiveness of actions on the ground;
- Accountability – including alignment with national priorities and accountability mechanisms, supporting the development and use of quality / accessible / timely disaggregated data for development results, and consultation and inclusion in the design / implementation and uptake of accessible grievance mechanisms.

The FISH-ADAPT project will have a dedicated Environmental and Social Safeguards (ESS) Specialist within the Project Management Unit (PMU). This specialist will be responsible for ensuring the project adheres to the ESAP and FESM throughout its duration, monitoring and ensuring implementation of mitigation measures. The responsibilities will include:

- **Environmental and Social Assessments:** Conduct comprehensive environmental and social assessments for all project activities, utilizing FAO's ESS Screening Checklist and preparing Environmental and Social Management Plans (ESMPs) for sub-projects as needed. This will involve collaboration with technical experts, including the Ministry of Agriculture technical advisor, fisheries specialist, gender specialist, and relevant service providers.
- **Training and Capacity Building:** Provide training to PMU staff and relevant implementing agencies on the ESAP, including stakeholder engagement processes and the Grievance Redress Mechanism (GRM). The ESS Specialist will collaborate with the Gender Specialist to ensure training incorporates gender-sensitive approaches.
- **ESMF Validation:** Present and explain the ESAP, including the GRM, to stakeholders during consultations, gather feedback, and incorporate it into the Annual Work Plan and Budget (AWPB) process. This ensures stakeholder input is central to the project's environmental and social safeguards.
- **Monitoring and Evaluation:** Contribute to the project's monitoring and evaluation (M&E) framework by providing input on environmental and social safeguards aspects. This includes



collaborating with the PMU M&E Officer to prepare relevant sections for annual reporting, mid-term, and final evaluations.

The ESS Specialist will play a crucial role in ensuring that the FISH-ADAPT project is implemented in an environmentally and socially sustainable manner, minimizing potential negative impacts and maximizing positive outcomes for the fisheries sector and communities in Saint Lucia.

In addition to grievance and conflict resolution mechanisms at the programme and project level, FAO has established an independent accountability mechanism as a supplemental means to address the complaints and concerns of stakeholders involved in or affected by FAO programmes and projects, and review alleged or potential violations of FAO environmental and social safeguards.

The accountability mechanism is designed to be independent, transparent, accessible, responsive, free of charge and effective. It provides beneficiaries of FAO programmes and projects with a means to have their complaints resolved and keep them informed of what is being done to address their concerns throughout the compliance review process. The independent accountability mechanism seeks to identify any potential breaches of FAO policies and procedures as outlined within the requirements of the FESM.

The independent accountability mechanism, as specified in the Compliance Reviews Following Complaints Related to the Organization's Environmental and Social Standards Guidelines (FAO, 2015b), explain the requirements for filing a complaint and the process that OIG will utilize in reviewing alleged non-compliance with FAO environmental and social standards. To be eligible, all complainants must indicate the steps they have taken to make good faith attempts to resolve their complaints with the management of the FAO programme or project and the results of those attempts; or demonstrate a good reason (e.g. reasonable fears about their safety) for not approaching the programme or project management. If the compliance review process results in findings of non-compliance, OIG will direct recommendations to FAO management to bring the programme or project into compliance.

## 6. Stakeholder engagement and information disclosure

During the formulation of the project, stakeholder engagement was conducted through workshops, one-on-one meetings, and consultations with key groups, including fishers, fisheries managers, value chain actors, and representatives from both the public and private sectors. Special attention was given to gender considerations and to vulnerable groups who may face disproportionate impacts. Stakeholders were categorized into primary (directly affected), secondary (indirectly affected but interested), and vulnerable groups requiring tailored engagement approaches. Consultations with affected people and other stakeholders, including photos and sex disaggregated data can be found in Annex 12a, Stakeholder Engagement Plan (SEP) and in Annex 1 of the Gender Assessment Action Plan (GAAP).

The comments and concerns received from primary and secondary stakeholders is summarized in the feasibility study as the barriers to climate resilience. These include:

*Table 3 Barriers to climate resilience*

Barrier type	Description
Financial	<ul style="list-style-type: none"> <li>• High operating costs and limited endurance of traditional fishing vessels limit fishers' ability to save and invest in climate resilient practices. Fuel, equipment and labor combined with cancelled trips during periods of wet and windy weather makes fishing expensive and leads to overfishing in nearby coastal areas.</li> <li>• Limited productivity due to small plot size and few economies of scale restricts farmers' ability to invest in climate resilient aquaculture.</li> <li>• Limited financial literacy, poor record-keeping and risk aversion reduce ability and willingness to access and secure loans to invest in climate resilience, or insurance products to cover potential losses (often with limited data to highlight climate impacts – see informational barriers).</li> </ul>
Market	<ul style="list-style-type: none"> <li>• Limited investment capacity because fishers are unable to reliably supply the diversity of fish products demanded by the market, leading to competition from imported fish that is cheaper, more diversified and consistently supplied.</li> </ul>
Technical	<ul style="list-style-type: none"> <li>• Limited access to tools, equipment, and training to monitor, analyze and respond to climate information.</li> </ul>
Information	<ul style="list-style-type: none"> <li>• Limited knowledge of climate change effects on fish habitats and appropriate response measures.</li> <li>• Limited access to fish stocks data and management systems.</li> </ul>
Institutional	<ul style="list-style-type: none"> <li>• Limited Department of Fisheries staff numbers and capacity hinder active monitoring, engagement, and enforcement of policies.</li> </ul>

These barriers affected all groups, but there were further disaggregated challenges for vulnerable groups, which are summarized in the table below.

*Table 4 Vulnerable groups affected*

Affected group	Barriers
Women	<ul style="list-style-type: none"> <li>• Women bear disproportionate responsibility for unpaid care work and face cultural biases limiting their access to male-dominated sectors like fishing.</li> </ul>

	<ul style="list-style-type: none"> <li>• Women struggle with loan access due to lack of land ownership and financial literacy. Many rely on informal financing (e.g., "sou sou") or fund male fishers instead.</li> <li>• Women have restricted land ownership and face barriers to registering fishing vessels due to infrastructure requirements (e.g., lack of onboard bathrooms).</li> <li>• Women dominate fish processing and selling but are mostly unregistered, leading to exclusion from official data. Their financial contributions to fisheries are often invisible.</li> <li>• Women-owned businesses are more vulnerable due to informal financing and lack of insurance, increasing livelihood insecurity in extreme weather events.</li> </ul>
Older men	<ul style="list-style-type: none"> <li>• Limited access to and reach of training and skill-building opportunities for various value chains across the sector and physical challenges since men dominate labor-intensive and physically demanding parts of the fisheries sector.</li> </ul>
LGBTQ+	<ul style="list-style-type: none"> <li>• LGBTQ+ individuals face potential employment discrimination in male-dominated sectors, particularly in fishing.</li> <li>• Due to stigma, many conceal their identities to secure work, leading to a lack of documented cases of workplace discrimination.</li> </ul>
Youth	<ul style="list-style-type: none"> <li>• Young men face high school dropout rates and inadequate employment training, increasing youth unemployment.</li> <li>• Young people struggle with loan access due to lack of assets and start-up capital, which limits entrepreneurship opportunities.</li> <li>• Economic instability in the fisheries sector due to extreme weather events limits job security for youth trying to enter the field.</li> </ul>
PWDs	<ul style="list-style-type: none"> <li>• PWDs face barriers to credit and financing, like women and youth, due to lack of collateral and financial discrimination.</li> <li>• Social norms and discriminatory practices further limit employment opportunities for PWDs in fisheries and related sectors.</li> </ul>

Apart from these stakeholder consultations, an additional mission took place to identify whether there was any presence of Indigenous Peoples in the project area, and if so what their needs and concerns would be. The consultations conducted included engagement with local communities in Choiseul, government and academia and were summarized in a report which concluded that there was no presence of Indigenous Communities in St. Lucia. The identified challenges were integrated into the project design in particular through the GAAP, where a costed action plan inclusive of outputs, activities, indicators and targets, timelines and responsibilities include all the identified vulnerable groups.

The process for carrying out continuing consultation during project implementation is detailed in Annex 1 in the SEP. Summarized, the project will maintain ongoing communication with stakeholders, ensuring primary groups remain actively involved while keeping secondary stakeholders informed. The SEP will in its consultations be guided by inclusiveness, transparency, accountability, meaningful engagement and gender and social inclusion. Information about the project will be shared on the project website, newsletters, social media, community radio and through public meetings. Special

efforts will be made to engage vulnerable populations, and consultations will be adapted to accommodate accessibility challenges, including the use of virtual meetings when necessary. The engagement activities include consultation meetings, programme launch, updates on implementation, monitoring activities and post-project evaluation results. These methods of engagement are included in the design of the project and will be ongoing throughout the project duration. The Fisheries Project Unit will oversee implementation, updating the engagement plan as field interventions are defined to ensure continuous stakeholder participation and integration of feedback.

## 7. Grievance Redress Mechanism

The project will establish a grievance redress mechanism (GRM) to address any complaints that may arise during implementation.

The GRM will be a system by which queries or clarifications about the programme will be responded to; problems with implementation will be resolved, and complaints and grievances will be addressed efficiently and effectively. The purpose of the grievance redress mechanism is to:

- be responsive to the needs of beneficiaries and to address and resolve their grievances;
- serve as a conduit for soliciting inquiries, inviting suggestions, and increasing community participation;
- collect information that can be used to improve operational performance;
- enhance the programme's legitimacy among stakeholders;
- promote transparency and accountability; and
- deter fraud and corruption and mitigate programme risks.

The GRM will consist of three parallel systems. These systems are: (i) a formal system designed specifically for the project (project-level GRM); (ii) the FAO's approach to the GRM (FAO-level GRM), and (iii) GCF Independent Redress Mechanism (IRM). When an aggrieved person declares a grievance, they may elect to take the project-based route or the more FAO-level one. The project-level based GRM will be established during the first months of implementation (inception phase) and clear communication about the GRM channels and PSEA channels will be disseminated in all project sites and communities at inception.

### Formal project-level GRM

This FISH-ADAPT project will establish a formal, project-specific GRM during the inception phase of the implementation of this project (during the first 6 months after GCF effectiveness of this project). The mandate of the project-level GRM will be to:

- (i) Receive and address any concerns, complaints, notices of emerging conflicts, or grievances alleging actual or potential harm to affected person(s) (the "Claimant[s]") arising from Project.
- (ii) Assist in resolution of grievances between and among project stakeholders as well as the various government ministries, agencies, and commissions, CSOs and NGOs, and others (collectively, the "Stakeholders") in the context of the Project.
- (iii) Conduct itself at all times in a flexible, collaborative, and transparent manner aimed at problem solving and consensus building.

The functions of the GRM will be to:

- (i) Receive, log and track all grievances received.
- (ii) Provide regular status updates on grievances to claimants, Project Steering Committee (PSC) members and other relevant stakeholders, as applicable.
- (iii) Engage the PSC members, Government institutions and other relevant stakeholders in grievance resolution.
- (iv) Process and propose solutions and ways forward related to specific grievances within a period not to exceed sixty (60) days from receipt of the grievance.
- (v) Identify growing trends in grievances and recommend possible measures to avoid the same.
- (vi) Receive any service requests for, and suggest the use of, mediation or facilitation.
- (vii) Elaborate annual reports, make said reports available to the public, and more generally work to maximize the disclosure of its work (including its reports, findings, and outcomes).
- (viii) Ensure increased awareness, accessibility, predictability, transparency, legitimacy, and credibility of the GRM process.
- (ix) Collaborate with partner institutions and other NGOs, CSOs and other entities to conduct outreach initiatives to increase awareness among stakeholders as to the existence of the GRM and how its services can be accessed.
- (x) Ensure continuing education of PSC members and their respective institutions about the relevant laws and policies that they will need to be aware of to participate in the development of effective resolutions to grievances likely to come before the GRM.
- (xi) Monitor follow up to grievance resolutions, as appropriate.

The **process** for dealing with complaints through the project-level GRM will be as follows:

- (i) After the complainant files a complaint, this complaint will be registered by the Safeguards Specialists or Gender and Social Inclusion Specialist in the PMU and sent to the PMU Project Coordinator to confirm that the complaint is eligible. The confidentiality of the complaint must be preserved during the process.
- (ii) Eligible complaints will be addressed by the PMU. The PMU Project Coordinator will be responsible for recording the grievance and how it has been addressed, if a resolution was agreed.
- (iii) If the situation is too complex, or the complainant does not accept the resolution, the complaint must be sent to a higher level, until a solution or acceptance is reached.
- (iv) For every complaint received, a written proof will be sent within ten (10) working days; afterwards, a resolution proposal will be made within thirty (30) working days.
- (v) In compliance with the resolution, the person in charge of dealing with the complaint, may interact with the complainant, or may call for interviews and meetings, to better understand the reasons.
- (vi) All complaints received, its response and resolutions, must be duly registered.

## Internal process

- Level 1:** Project Management Unit (PMU). The complaint could come in writing or orally to the PMU directly. At this level, received complaints will be registered, investigated and solved by the PMU.
- Level 2:** If the complaint has not been solved and could not be solved in level 1, then the PMU Project Coordinator elevates it to the FAOR in the beneficiary country.
- Level 3:** Project Steering Committee (PSC). The assistance of the PSC is requested if a resolution was not agreed in levels 1 and 2.
- Level 4:** Sub-Regional Office for the Caribbean. FAOR will request if necessary the advice of the Sub-Regional Office to resolve a grievance, or will transfer the resolution of the grievance entirely to the sub-regional office, if the problem is highly complex.
- Level 5:** Only on very specific situations or complex problems, the FAO Sub-Regional Representative will request the assistance of the FAO Inspector-General, who pursues its own procedures to solve the problem.

## Resolution

Upon acceptance a solution by the complainer, a document with the agreement should be signed with the agreement.

*Table 5 Roles within the formal project-level GRM*

Project Management Unit (PMU)	Must respond within 5 working days. The focal points at the PMU will be the safeguards specialist and the project coordinator. Official FAO email accounts will be established once they are recruited.
FAO Country Representative	The designated focal point of each FAO Representation may receive a complaint and must request proof of receipt. If the case is accepted, the focal point must respond within 5 working days in consultation with FAO's Representation and Project Team.  FAO Representative: Renata Clarke. <a href="mailto:Renata.clarke@fao.org">Renata.clarke@fao.org</a>
Project Steering Committee (PSC)	If the case cannot be dealt by the FAO Representative, he/she must send the information to all PSC members and call for a meeting to find a solution. The response must be sent within 5 working days after the meeting of the PSC.
FAO Sub-Regional Office for the Caribbean	Must respond within 5 working days in consultation with FAO's Representation.  FAO Sub-Regional Office for the Caribbean: Anthony Kellman; Office of the Sub-Regional Coordinator for the Caribbean  e-mail: <a href="mailto:Anthony.Kellman@fao.org">Anthony.Kellman@fao.org</a> ; <a href="mailto:RLC-ADG@fao.org">RLC-ADG@fao.org</a>  Tel: +1 246 492 2002
Office of the Inspector General (OIG)	To report possible fraud and bad behaviour by fax, confidential:  (+39) 06 570 55550  By confidential hotline (online form & by phone): <a href="http://fao.ethicspoint.com">fao.ethicspoint.com</a>  By e-mail: <a href="mailto:Investigations-hotline@fao.org">Investigations-hotline@fao.org</a>  By confidential hotline: (+ 39) 06 570 52333

**Responsible roles** within the project-level GRM are as follows:

- (i) *Safeguards Specialists and Gender and Social Inclusion Specialist*. The complaint could come in writing or orally (including over the phone) to the Safeguards Specialists and/or Gender and Social Inclusion Specialist within the PMU. At this level, received complaints will be registered and screened by one of these officers for eligibility. Screened complaints will then be sent to the Project Coordinator in the PMU. These two specialist will also be the focal points that will be handling SEAH grievance cases.
- (ii) *Project Management Unit*. The complaint should come in writing from the Safeguards Specialist or Gender and Social Inclusion Specialist within the central or regional PMUs to the Project Coordinator in the Central PMU directly. The Project Coordinator will provide final confirmation of eligibility and proceed to investigate and resolve the complaint.
- (iii) *Project Steering Committee (PSC)*. If the complaint has not been solved and could not be solved with the PMU, then the chair of the PSC must address the complaint. If this still cannot be resolved, then the complaint is sent to the next level (FAO Representative).
- (iv) *FAO Representative*. The assistance of the FAO Representative is requested if a resolution was not agreed in the first two levels (PMU and PSC).
- (v) *FAO Regional Office for Latin America and the Caribbean*. The FAO Representative will request, if necessary, the advice of the Regional Office to resolve a grievance or will transfer the resolution of the grievance entirely to the regional office, if the problem is highly complex.
- (vi) *The FAO Regional Representative* will request – only on very specific situations or complex problems – the assistance on the FAO Inspector General, who would then pursue procedures of the Office of the Inspector General (OiG) to solve the problem.

FAO is currently implementing an after-project assessment in its projects to get feedback from beneficiaries on mechanisms like the GRM. This feedback will be discussed at management level and incorporated into subsequent projects.

In addition, there will be zero tolerance of SEAH, and the implementation safeguards documents will mainstream SEAH risk mitigation. The project will support gender sensitization and trainings for project staff, the EEs and beneficiaries on gender equality and social inclusion and SEAH as part of the trainings on the Household Methodology involving vulnerable groups such as female-headed households, women, children and person living with HIV/AIDS. Specific procedures to minimize SEAH risk will be developed for the project GRM, to ensure the mechanism is survivor-centred and gender-responsive (including confidential reporting), and to facilitate linkages to related services and redress for anyone affected by SEAH. The survivor-centered GRM will align with FAOs action plan for the Prevention of Sexual Exploitation and Abuse and Sexual Harassment and follow FAO corporate policies and procedures, namely:

- a) Policy on the Prevention of Harassment, Sexual Harassment and Abuse of Authority – 2015;
- b) Protection from Sexual Exploitation and Sexual Abuse (PSEA) – 2013; c) Whistleblower Protection Policy – 2011.

Furthermore, SEAH topics will be integrated into gender sensitization and training activities for both project staff, the EEs and beneficiaries, ensuring all stakeholders are equipped to recognize and address SEAH issues effectively. A specific code of conduct will be elaborated for project implementation, outlining clear guidelines and expectations regarding behaviour and interactions to

prevent and address SEAH. To uphold accountability, regular PSEAH training, clear reporting lines to senior management and oversight bodies, will be ensured.

Tailored procedures will be developed within the GRM to handle and minimize SEAH and GBV risks/cases and ensure a survivor-centered, gender-responsive approach. This includes establishing protocols for confidentiality, sensitive and ethical complaint handling, and grievance reporting, prioritizing survivors' needs, and facilitating linkages to related services for redress. Confidential and accessible reporting channels—such as secure online platforms and in-person reporting—will be established, with strict data protection measures that limit case details to trained personnel. The mechanism will follow a survivor-centered approach, prioritizing informed consent, the do-no-harm principle, and multiple safe entry points for complaints. Survivors should have access to immediate medical care, legal aid, and long-term psychosocial and economic reintegration support, with strong referral pathways to local NGOs, UN agencies, and government services. These will be outlined within the GRM. Additionally, complaint-handling staff must be trained in gender-sensitive and trauma-informed approaches, allowing survivors to choose the gender of their case handler where possible and ensuring culturally appropriate responses

By aligning with FAO guidelines and integrating these measures, the project aims to strengthen our approach to addressing SEAH within the project and ensure the safety and well-being of all project stakeholders. These measures reflect best practices outlined in FAO's PSEAH Policy, the UN Secretary-General's Bulletin on PSEA (ST/SGB/2003/13), and the Inter-Agency Standing Committee (IASC) guidelines on PSEAH.

In the case of any SEAH allegations, the FISH ADAPT project (the Safeguards Specialists and/or Gender and Social Inclusion Specialist within the PMU) will refer to the PSEA Focal Point for FAO St. Lucia and to the OIG.

*Table 6 Focal points for PSEA*

PSEA Focal Point Saint Lucia	Anthony Kellman <a href="mailto:anthony.kellman@fao.org">anthony.kellman@fao.org</a> , with alternate Shonnet Charles <a href="mailto:shonnet.charles@fao.org">shonnet.charles@fao.org</a>
OIG	FAO Hotline: <a href="https://www.fao.org/aud/69204/en/">https://www.fao.org/aud/69204/en/</a>  Email directly to OIGI at: <a href="mailto:investigations-hotline@fao.org">investigations-hotline@fao.org</a>  St. Lucia Telephone: +1-678-896-4026  Regular mail: Office of the Inspector General Food and Agriculture Organization of the United Nations Viale delle Terme di Caracalla 00153 Rome, Italy

The timeline required to complete an investigation of SEAH varies depending on the complexity of the matter, but FAO emphasizes the importance of prompt action.



#### FAO's approach to the GRM (FAO-level GRM)

In addition to the above-mentioned approaches, aggrieved people can also employ additional channels to air their complaints. These include the FAO Complaints procedure, as outlined in the 2015 *FAO Guidelines for Compliance Reviews Following Complaints Related to the Organization's Environmental and Social Standards*. The objective of the FAO Complaints Procedure is to ensure that appropriate mechanisms are in place to allow individuals and communities to contact FAO directly and file a complaint if they believe they are or might be adversely affected by an FAO-funded project not complying with FAO's FESM.

FAO is committed to ensuring that its programmes are implemented in accordance with the organization's environmental and social obligations, and therefore supports the establishment and implementation of **Grievance Redress Mechanism** as a crucial process to ensure that parties involved in and affected by the activities of FAO programmes and projects have access to fair, transparent, inclusive and cost-free process and mechanisms to redress grievances and resolve conflict. FAO programmes have access to an effective and timely mechanism to address their concerns about non-compliance with E&S obligations (including SEAH and GBV). In order to supplement measures for receiving, reviewing and acting as appropriate on these concerns at the programme management level, FAO has entrusted the Office of the Inspector-General with the mandate to independently review the complaints that cannot be resolved at that level. FAO grievance, feedback and complaint mechanisms should be:

- **Legitimate:** They should be trusted by the intended stakeholder groups for whose use they are intended and be accountable for the fair conduct of grievance processes.
- **Accessible:** They should be known to all stakeholder groups for whose use they are intended and provide adequate assistance for those who may face barriers to access (such as language and mobility). They should be age- and gender-inclusive; address access barriers for different groups, including marginalized, vulnerable and disadvantaged persons and persons with disabilities; and deal with concerns promptly and effectively in a transparent manner that is culturally appropriate at no cost and without retribution.
- **Predictable:** Provide entry points for communicating concerns and clarity on the mechanism's procedures and keep the parties with grievances informed about progress by providing sufficient information about the mechanism's performance. A grievance mechanism requires that the involved and affected stakeholders know about it, trust it and are able to use it. It is important to maintain a record of responses to all grievances received and make this available where appropriate; inform the involved and affected parties on how to access the mechanism during stakeholder engagement activities; and indicate the appeals process to which complainants may be referred to, when resolution has not been achieved.
- **Rights-compatible:** They should ensure that outcomes and remedies are in line with internationally recognized human rights. The mechanism should not prevent access to judicial or administrative remedies. Where feasible and suitable, utilize other existing formal or informal mechanisms as a supplement to the grievance mechanism, if needed, to ensure conformity with internationally recognized human rights.
- **Open to continuous learning:** They should incorporate measures to identify lessons learned that can improve the mechanism and prevent future grievances and harm.
- **Confidential:** The safety of the complainant should always be a primary consideration during reporting, investigation, and thereafter. Complaint mechanisms must consider potential dangers

and risks to all parties, including survivors of GBV and abuse and incorporate ways to prevent additional harm. This should include the availability of confidential complaint mechanism systems.

In this regard, FAO-level GRM is designed and established to ensure that concerns and grievances from people who believe that they have been harmed/affected by the projects or programmes implemented or financed by the organization are voiced; and to identify agreeable solutions within a reasonable timeframe. Special efforts will be made to ensure the grievance redress mechanism is available for all people, and that women, Indigenous Peoples, marginalized, and other vulnerable and or socially excluded groups have equal access and bear no negative repercussions for filing any complaints or grievances. Any cost that may be associated with the preparation or issuance of a legitimate complaint or grievance (e.g. engaging a qualified person to assist the complainant) will be covered by the grievance mechanism.

FAO will facilitate the resolution of concerns of beneficiaries of FAO programmes regarding alleged or potential violations of FAO's social and environmental commitments which includes SEAH and GBV. All concerns and/or incidents related to sexual exploitation and abuse must be addressed to the PSEA Focal Point in the country and to the Office of the Inspector General (OIG) as appropriate. In case of SEAH/ GBV incidents, the services for survivors will be carefully considered during the implementation.

FAO will facilitate the resolution of concerns of beneficiaries of FAO programmes regarding alleged or potential violations of FAO's social and environmental commitments. For this purpose, concerns may be communicated in accordance with the eligibility criteria of the Guidelines for Compliance Reviews Following Complaints Related to the Organization's Environmental and Social Standards, which applies to all FAO programmes and projects (Guidelines for Compliance Reviews Following Complaints Related to the Organization's Environmental and Social Standards). The principles to be followed during the complaint resolution process include impartiality, respect for human rights, including those pertaining to Indigenous Peoples, compliance of national norms, and coherence with such general norms as equality, transparency, honesty, and mutual respect.

Concerns must be addressed at the closest appropriate level, i.e. at the project management/technical level, and if necessary, at the Regional Office level. If a concern or grievance cannot be resolved through consultations and measures at the project management level, a complaint requesting a Compliance Review may be filed with the OIG in accordance with the Guidelines. Programme and project managers will have the responsibility to address concerns brought to the attention of the focal point.

Any project stakeholder can file a grievance through at least 3 channels: the project GRM, the Country Office GRM (which may be the same as the project GRM), and Office of Inspector General (OIG). GRM shall receive and address complaints related to the implementation of activities in a timely and culturally appropriate manner.

FAO prohibits and prevents retaliation against workers and other stakeholders who seek to be informed about and participate in activities that are supported or implemented by the Organization; express their concerns about them; or gain access to the processes and mechanisms of FAO programmes and projects for redressing grievances. The Organization neither tolerates nor contributes to threats, intimidation, retaliation or physical and legal attacks against human rights defenders and stakeholders who are involved in and affected by FAO programmes and projects. Respect should always be given to requests for confidentiality regarding the identities of complainants and disclosure of information provided to these mechanisms.

## GCF Grievance Mechanism

GCF established an [Independent Redress Mechanism \(IRM\)](#) that reports directly to the Board. The IRM's mission is to address complaints from affected people and provide recourse in a way that is fair, effective and transparent, and enhance the performance of GCF's climate funding. The IRM also accepts requests from developing countries seeking reconsideration of funding proposals that were denied by the GCF Board. To deliver its mandate, the IRM is guided by several GCF policies pertinent to GCF's general operations and its projects and programmes: Revised E&S Policy, Interim E&S Safeguards, Indigenous People Policy, Updated Gender Policy and Information Disclosure Policy of the GCF. In relation to Indigenous Peoples project-related concerns, the GCF Independent Redress Mechanism and the Secretariat's Indigenous Peoples focal point were available for assistance at any stage, including before a claim has been made.

As per the Procedures and Guidelines of the IRM, the main functions of the IRM include among others:

1. Address grievances or complaints by a person, group of persons or community who/which have been or may be adversely impacted by a GCF funded project or programme through problem solving and/or compliance review, as appropriate;
2. Initiate proceedings on its own to investigate grievances of a person, group of persons or community who/which have been or may be adversely impacted by a GCF funded project or programme;
3. Monitor whether decisions taken by the Board based on recommendations made by the IRM, or agreements reached in connection with grievances or complaints through problem solving, have been implemented, and report on that monitoring to the Board.

Regardless of the different E&S mitigation measures and procedures in place, climate adaptation and mitigation projects can inadvertently have adverse impact on communities. Taking this into consideration, GCF provides a platform where communities, Indigenous People and civil society can present complaints regarding a specific GCF financed project and seek remedy (redress harm) and improve project performance in the long run. There are no formal requirements for filing a complaint. A complaint should generally include: i) the complainant's name, address and contact information; ii) If the complaint is being filed by a representative of the complainant, the name and contact information of the representative, as well as evidence that the representative is authorized to act on behalf of the complainant; iii) A description of the project or programme that has caused or may cause adverse impacts to the complainant; iv) A description of how the complainants have been or may be adversely impacted by the project or programme; v) Whether confidentiality is being requested and the reasons for it.

Some exclusions apply, as indicate in the IRM guidelines. The complaint can raise issues related to any of GCF's policies and procedures, including those relating to social and environmental issues, Indigenous Peoples, gender, information disclosure, among others. However, the IRM cannot accept a complaint if it is:

- i) About a project or programme where the GCF is not directly and/or indirectly involved;
- ii) About GCF's non-operational housekeeping, such as human resources and finance;
- iii) Allegations of corruption or procurement issues (these complaints are handled by the Independent Integrity Unit (IIU) and other Units at the GCF);
- iv) Only about whether the GCF's policies and procedures are adequate; v) About a matter already dealt with by the IRM, unless there is new relevant information that was not available before; or

vi) Malicious, frivolous and/or fraudulent or filed to gain a competitive advantage.

Complaints may be filed directly to the Independent Redress Mechanism - Green Climate Fund:

Email: [irm@gcfund.org](mailto:irm@gcfund.org)

Office telephone: +82 32-458-6186; Fax: +82 32-458-6096; Cellphone: +82 10-4296-1337

## 8. [FAO list of excluded activities](#)

FAO will not knowingly support, directly or indirectly, projects involved in activities, production, trade, or use of the products, or substances listed below. Additional exclusions may apply in the context of a specific project.

- Harmful or exploitative forms of child labour.
- Harmful or exploitative forms of forced labour.
- Forced evictions without the provision of and access to appropriate forms of legal and other protection.
- Activities that result in the exploitation of and access to outsiders to the lands and territories of Indigenous Peoples in voluntary isolation and in initial contact.
- Destruction of protected areas or other high biodiversity and High Conservation Value areas
- Construction or financing of dams over 15m in height.
- Activities that are illegal under host country laws, regulations or ratified international conventions and agreements relating to biodiversity protection or cultural heritage.
- Activities or materials deemed illegal under host country laws or regulations or international conventions and agreements, such as:
  - products that contain any substances that are banned for use or trade under applicable international treaties and agreements, or meet the criteria of carcinogenicity, mutagenicity, or reproductive toxicity as set forth by relevant international agencies; and
  - wildlife or products regulated under the Convention on International Trade Endangered Species or Wild Fauna and Flora (CITES).
- Cross-border trade in waste and waste products, unless compliant to the Basel Convention and the underlying regulations.
- Trade related to pornography and/or prostitution.
- Production and distribution of racist and discriminatory media.
- Project's activities for which any of the following products is having a primary role:
  - production, use or trade in radioactive materials<sup>1</sup> and unbounded asbestos fibres or asbestos-containing products;
  - blast fishing and large-scale pelagic drift net fishing using nets in excess of 2.5 km in length;
  - production or trade in alcoholic beverages (except beer and wine) and tobacco;
  - production, use, trade or distribution of weapons and munitions; and
  - gambling, casinos or equivalent enterprises.
- Project specific:
  - Introduction of non-native species.

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