

SINT MAARTEN WASTEWATER MANAGEMENT PROJECT

STAKEHOLDERS ENGAGEMENT PLAN

DRAFT 4

December 2023

National Recovery Program Bureau

TABLE OF CONTENTS

1	Project Description	5
2	Description of the SEP	7
2.1	Objectives of the Stakeholder Engagement Plan	8
3.	Stakeholder Identification and Analysis	8
3.1	Methodology	8
3.2	Stakeholder Analysis - Identification and Categorization	9
4.	Stakeholder Identification, Categorization and Analysis	11
5.	Disadvantaged/Vulnerable Individuals or Groups	14
6	Stakeholder Engagement Program	14
6.1.	Summary of stakeholder engagement planned for, and held, during project preparation	14
6.2	Stakeholder Engagement Plan	19
6.3	Proposed strategy to incorporate the views of vulnerable groups	23
6.4.	Reporting back to stakeholders	24
7	Resources and Responsibilities for Implementing Stakeholder Engagement Activities	25
7.1	Resources	25
7.2	Management Functions and Responsibilities	26
8	Grievance Redress Mechanism	27
9	Monitoring and Reporting	32
9.1.	Summary of how SEP implementation will be monitored and reported upon (including indicators)	32
9.2	Involvement of stakeholders in monitoring activities	33
	<i>Reports</i>	<i>36</i>
	<i>Current situation</i>	<i>36</i>
	<i>Feedback and recommendations</i>	<i>36</i>

List of Tables

Table 1: Stakeholder Identification and Analysis	11
Table 2: Summary of Stakeholder Engagement Activities held during the Project Preparation Phase	15
Table 3: Consultations Planned for Project Implementation Phase	19
Table 4: Strategy for Engaging With Vulnerable Groups	23
Table 5: Stakeholder Engagement Activities for the Short, Medium and Long Term	24
Table 6: Budget for SEP	25
Table 7: Grievance Redress Mechanim.....	28
Table 8: Monitoring and Reporting on the SEP.....	32

List of Figures

Figure 1: Overview of Sewage Expansion Areas and Location of the WTP.....	7
---	---

List of Annexes

Annex 1:	Feedback from (Public) Consultations
Annex 2:	Stakeholder Consultation Presentation
Annex 3:	Consultation With Representatives of the Community - Email Sent to Invitees
Annex 4:	Reminder Email
Annex 5:	Consultations representatives Community Councils – and Utility companies - Email Sent to Absent Invitees (with Presentation Slides and Project Summary)
Annex 6:	Request for feedback on SEP - Email Sent to Stakeholders
Annex 7:	Email sent with Reminder to Stakeholders to Provide Feedback on the Project and the SEP
Annex 8:	WhatsApp message sent to stakeholders
Annex 9:	Facebook Post of Project SEP (with Request to Review)

Abbreviations and Acronyms

C-ESMP	Contractor – Environmental and Social Management Plan
ESA	Environmental and Social Assessment
ESCP	Environment and Social Commitment Plan
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
GDP	Gross Domestic Product
GEBE	Gemeenschappelijk Elektriciteitsbedrijf Bovenwindse Eilanden/ Common Electricity Company Windward Islands
GoSM	Government of Sint Maarten
GRM	Grievance Redress Mechanism
LMP	Labour Management Procedures
NL	The Netherlands
NRPB	National Recovery Program Bureau
PCN	Project Concept Note
SEP	Stakeholder Engagement Plan
SWaMP	Sint Maarten Wastewater Management Project
SXM	Sint Maarten
VROMI	Ministry of Public Housing, Spatial Planning, Environment and Infrastructure
VSA	Ministry of Public Health, Social Development and Labour
WSS	Water Supply and Sanitation
WTP	Wastewater Treatment Plant

1.1. Country and Sector Context

Sint Maarten is considered a high-income constituent country of the Kingdom of the Netherlands in the Caribbean, along with Aruba and Curacao. It occupies the southern half of an island shared with the French overseas collectivity of Saint Martin and is the most densely populated country in the Caribbean, with a population of well over 40,000 in an area of 34 square kilometers. Sint Maarten's Gross Domestic Product (GDP) per capita of US\$29,189 in 2020 was among the highest in the region prior to the 2020 COVID-19 pandemic. Sint Maarten is particularly vulnerable to climate change related and other natural disasters, which periodically cause extreme disruption of the country's economic activities and living conditions and have a catastrophic impact on the country's tourism-driven economy.

On September 6, 2017, Hurricane Irma, a Category 5 hurricane, caused significant destruction in Sint Maarten. Damages were compounded by Hurricane Maria two weeks later. Although loss of life was limited, Sint Maarten incurred major damages and losses estimated at 129 percent of GDP, or US\$2.7 billion. Ninety percent of all infrastructure was affected and much still requires repairs. Though little is known about the distribution of hurricane impacts and their effect on vulnerable groups in Sint Maarten, international experience shows that disasters disproportionately affect persons with limited financial resources and persons in vulnerable living situations, which includes Sint Maarten's female-headed households (38.7 percent of households) and children. Furthermore, these disasters are expected to increase in frequency and intensity due to climate change, posing additional threats to recovery efforts.

Existing public sewerage network coverage is severely limited, and covers only some districts and neighbourhoods of Sint Maarten, leaving significant areas and percentage of population uncovered. Although the GoSM has made several wastewater investments over time including construction of a wastewater treatment plant (WWTP) and development of sewerage infrastructure in various residential and commercial districts, it is estimated that only approximately 23 percent of Common Electricity Company Windward Islands (Gemeenschappelijk Elektriciteitsbedrijf Bovenwindse Eilanden - GEBE) water customers in East Sint Maarten have sewerage connections.

Project Objectives

The Sint Maarten Wastewater Management Project aims to

- (i) increase access to safely managed sanitation services; and
- (ii) improve sustainability and resilience of wastewater management.

Project Components

The project will consist of three components:

- (i) Wastewater infrastructure investment,
- (ii) Policy and Institutional development, and coastal seawater and surface water quality monitoring, and
- (iii) Project management.

Component 1: Wastewater infrastructure investment

This component would finance all stages of infrastructure development, including identification, design, supervision, and construction of new or upgrade/rehabilitation of existing wastewater collection, treatment, and disposal infrastructure, including needs of on-site sanitation management.

The component would include the preparation of Feasibility Studies, Environmental Impact Assessments, and other project documentation necessary to secure required permits, detailed designs, bidding documents, supervision and contracting of construction works. Project will also finance on-site sanitation needs, including development and standardization of septic tanks manuals, licensing, monitoring and optimization of septic sludge collection. The Project will support providing more energy-efficient wastewater services to minimize energy costs of service provision, through decentralized wastewater management, including the introduction of appropriate individual and close-to-nature wastewater solutions in appropriate locations to avoid pumping where possible. The Project support will focus on the area where investments can deliver the biggest benefits to the population's health and safety, as well as protection of the environment especially in the area with high population density, low sewerage coverage, sources of pollution, and direct threat to surface and coastal waters.

Component 1 will include two sub-components:

Sub-component 1.1: Wastewater collection. This first sub-component aims at improving the coverage and resilience of wastewater collection.

Sub-component 1.2: Upgrade of existing A. T. Illidge Road WWTP. This sub-component will include the necessary rehabilitation and upgrade of the existing A. T. Illidge Road WWTP.

Component 2: Policy and Institutional development, and surface and sea water quality monitoring.

Component 2 aims at creating the framework for the sustainable provision of efficient and resilient wastewater services in Sint Maarten. Sustainability is defined as the degree to which the system maintains levels of service in the long term while maximizing social, economic and environmental goals.

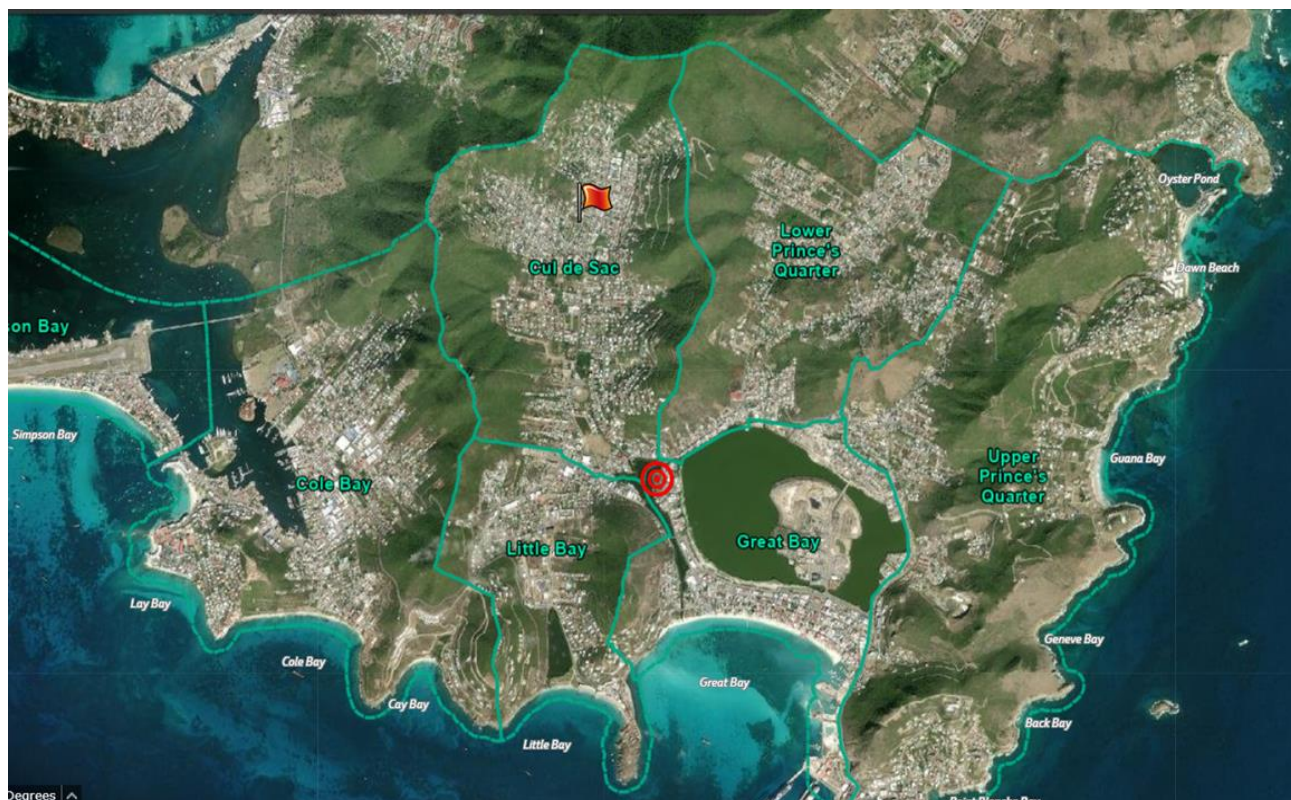
Component 3: Project management

Under this Component, the Project will support the project management and coordination capacity of the NRPB as a Project Implementation Unit (PIU), including support to the PIU on: (i) project monitoring and evaluation activities; (ii) environmental and social risk mitigation measures; (iii) training of PIU and government staff; (iv) annual audits for the project and providers; and (v) establishment of citizen engagement measures and grievance redress mechanisms for the project activities.

Project Location

The priority project area that will be covered by the project includes the Greater Cul de Sac area, and it could be extended, in case of funds availability, to other areas following the Government's priorities.

Figure 1: Overview of Sewage Expansion Areas and Location of the WTP



2 Description of the SEP

The World Bank's Environmental and Social Framework (ESF) Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Client and project stakeholders as an essential element of good international practice" (Introductory Paragraph, ESS10, Guidance Note for Borrowers, Environmental and Social Framework, IPF Operations).

This Stakeholders Engagement Plan (SEP) serves to support the implementation of relevant Stakeholder engagement requirements and guides the outreach and information disclosure of the Sint Maarten Wastewater Management Project (SWAMP) as it moves through critical milestones. The SEP recognizes the importance of open and transparent engagement between the project implementer, project beneficiaries, and other stakeholders as an essential element of good international practice. Stakeholder engagement is most effective when initiated at an early stage of the project development process. Furthermore, it is an integral part of early project decisions and the assessment, management & monitoring of the project's environmental and social risks and impacts.

The SEP also outlines a grievance mechanism whereby stakeholders and other members of the community can raise any concerns to the attention of the project, both verbally, written (by post or e-mail) or by filling in a grievance form.

2.1 Objectives of the Stakeholder Engagement Plan

The objectives of this Stakeholder Engagement Plan are adopted from those of ESS10 and are as follows:¹

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format. To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the NRPB to respond to and manage such grievances.

3. Stakeholder Identification and Analysis

3.1 Methodology

This Stakeholder Analysis conforms to the basis for the development of the Stakeholder Engagement Plan (SEP). Stakeholders were identified, categorized and assessed by their level of influence and importance. The results of the analysis will guide how each stakeholder will be consulted with and will determine content, frequency, strategies, methods and timing of consultations, among other requirements for effective engagement.

This SEP includes a Stakeholder Identification and Analysis. Each of the three (3) steps below have been conducted and presented in tabular format.

- 1 Stakeholder Identification and Analysis
 - Identification of stakeholders
 - Categorization of the identified stakeholders (Affected or Interested)
- 2 Determination of stakeholder influence on and importance to the project
- 3 Determination of the following for each stakeholder:

¹ <https://documents1.worldbank.org/curated/en/476161530217390609/ESF-Guidance-Note-10-Stakeholder-Engagement-and-Information-Disclosure-English.pdf>

- (i) Frequency of Engagement
- (ii) Engagement Strategy/Method
- (iii) Engagement Logistics (Date, Time, Venue, Budget)
- (iv) Content/Purpose of Engagement

3.2 Stakeholder Analysis - Identification and Categorization

One of the main elements of stakeholder engagement is stakeholder identification. The World Bank's ESF Guidance Notes for ESS10 describes the process for stakeholder identification. This includes the development of a list of stakeholders who have any type of link with the project. These stakeholders are then categorized as a project affected or a project interested party and assigned a perceived level of influence and importance during the preparation and implementation of the project.

According to the ESF, the term "stakeholder" refers to individuals or groups who:

- (a) are affected or likely to be affected by the project (Project-affected parties) for example project beneficiaries.
- (b) may have an interest in the project (Other interested parties); and
- (c) may be disadvantaged or vulnerable because of their particular circumstances (project-affected parties)

Influence indicates a stakeholder's relative power over and within a project. A stakeholder with high influence would control key decisions within the project and have strong ability to facilitate implementation of project tasks and cause others to act.

Importance (interest) indicates the degree to which the project cannot be considered successful if needs, expectations, and issues are not addressed because of the level of interest by the stakeholder. This measure is often derived based on the interest of the stakeholder for the project's goals and purposes.

“Direct project beneficiaries from new sewerage access will be around 11,000 people (25 percent of the Sint Maarten population) residing in the areas to be covered by the project, the complete population will benefit from a safer environment and improved water quality on the island” (PCN).

Affected Parties - Affected Parties include individuals or groups that are affected or likely to be subjected to direct impacts from the Project.

Other Interested Parties - The projects' stakeholders also include parties other than the directly affected communities, including:

Civil servants, staff of Government of Sint Maarten (Specific Government Entities: Ministry of VROMI, Ministry of Finance, Ministry of VSA – Public Health; Ministry of Justice – Police Department, Ministry of General Affairs - Fire Department).

In the small island context of St. Maarten, it is common for persons to be active in the community within different capacities. As such, a unique aspect of stakeholder engagement on St. Maarten is that civil servants are often also project affected persons or beneficiaries, as well as representatives of Community Councils, NGO's or other Civil Society Organizations.

While the Government of Sint Maarten (the Council of Ministers) is the principal of this project, the Civil servants within the respective ministries are not (all) by definition, direct participants in the government's preparation or decision-making process regarding the project. These Civil Servants however, often possess a wealth of both practical and technical knowledge regarding Sint Maarten's existing wastewater management infrastructure in the various neighborhoods, the Wastewater Treatment Plant as well as deficiencies which require remedying. For this reason, the civil servants who were part of this consultation are not considered as principals, but rather as stakeholders who provided useful knowledge and recommendations that were reflected in the design of the project activities.

The information civil servants receive and provide during interactions with NRPB, is provided from the context of their various capacities and that which is commonly used and disseminated within their own networks, taking into account any limitations. These limitations include avoidance of conflict of interest. As such, civil servants in St. Maarten are considered in the "Other Interested Parties" category of stakeholders.

4. Stakeholder Identification, Categorization and Analysis

This section lists the project stakeholders and presents an analysis of the nature of their involvement in the project.

Table 1: Stakeholder Identification and Analysis

Stakeholder Group	Stakeholder Name	Specific Entity	Stakeholder Categories		Influence (High, Medium, Low)	Importance (High, Medium, Low)
			Affected (Beneficiaries)	Interested		
Government Departments/Ministries	VROMI	Department of Permits Department of New works Department of Infrastructure and Management Department of Domain Affairs Inspection Department	x		High	High
	VSA	Public Health Department Inspectorate of VSA (IVSA) Ambulance Services	x		High	High
	Justice	Police Department	x		Medium	Medium
	MECYS	Department of Culture	x		Low	Low
	General Affairs	Fire Department	x		Low	Low
Members of Community Councils (Representing residents of the project affected areas) and Homeowners Association' Residents of the affected areas.	Cul De Sac	South Reward	x		Medium	High
		Saunders	x			
		Mary's Fancy	x			
		Retreat Estate	x			
		Betty's Estate	x			
		St Johns	x			
		St Peters	x			
	Bush Road	x				
School Boards	SKOS		x			
	SVOBE		x			

	SDA		x		Low	High
	Methodist School Board		x			
Private Schools			x		Low	High
Churches	Catholic		x			
	Methodist		x		Low	High
	SDA		x			
	Evangelical Churches		x			
	Baptist					
Health Services	Pharmacies	St Peter's Pharmacy	x		Low	High
		da Pharmacy, Bush Road	x			
	Medical Associations and Facilities	General Practitioners/Drs' Associations	x			
		EMS	x		Low	High
		District Nurses	x			
		SLS	x			
		Dentists	x			
Sporting Associations/Groups		Soccer/Football	x		Low	High
		Baseball	x			
		Basketball	x			
		Tri Sports (Running/Cycling/Water Sports)	x			
Businesses (Associations)		Indian Merchants Association	x		Low	High
		Chinese Businesses (find details)	x			
		Bakeries	x			
		Supermarkets	x			
		Restaurants/Bars	x			
		Grocery Shops	x			
		Stores (Clothing etc)	x			

		Banks	x			
		Gas Stations	x			
Utility Companies		GEBE	x		Low	High
		Telem	x			
		FLOW	x			
		Scarlet	x			
Transportation		Bus Drivers' Association	x		Low	High
		Taxi Drivers' Association	x			
		Tour Operators	x			
		Special Needs Transportation Services	x		Low	Low
NGOs/Interest Groups/ Environmental Organizations		EPIC		x	Medium	High
		Nature Foundation		x	Medium	High
		Sint Maarten Pride Foundation		x	Low Medium	High
		Emilio Wilson Park Foundation		x	Medium	High
NGOs Working With Vulnerable Groups		White and Yellow Cross Foundation	x		Low	High
		Mental Health Foundation	x		Low	High
Solid Waste Haulers			x		Low	Low
Wastewater Transportation Services			x		Low	Low
Current Staff of existing WWT plant			x		Low	Low

5. Disadvantaged/Vulnerable Individuals or Groups

The vulnerable or disadvantaged groups are as follows:

- Women and Children
- Elderly
- People with Disabilities
- Non-English-speaking Groups
- Low-income households

Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. A further description of the methods of engagement that will be undertaken with these groups, by the project, is provided in Section 6.1.

6 Stakeholder Engagement Program

The environmental and social instruments will be disclosed through social media and on the NRPB website. The feedback received and key points raised by stakeholders during consultations will be taken into account by members of the Project, Communications and E&S Teams present at the consultation. A summary of the main recommendations received from the website and public consultations will be integrated into the Stakeholder Engagement Plan.

The nature of engagement required for the various categories of stakeholders may differ during the preparation and implementation phases of the project when engagement is most fruitful and productive. The consultation method is determined by the level of influence and importance of the stakeholder and consultation methods may vary. Tables 2 and 3 provide details on the engagement with the different stakeholder groups planned for the preparation and implementation phases of the project.

6.1. Summary of stakeholder engagement planned for, and held, during project preparation

During project preparation, the following public consultations/meetings were conducted throughout 2023, specifically in March and November (Refer to Annex 1 for details). A copy of the relevant correspondence is provided in the annexes and includes the invitations distributed to the various stakeholders who were invited to the consultations.

Table 2: Summary of Stakeholder Engagement Activities held during the Project Preparation Phase

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Preparation	March 2023 ²	Provided feedback for the technical assessment. To inform about the future arrangements.	In person meetings	Current Staff of WWT Plant	NRPB (Project Management Team)
	March 2023	To get a better understanding of the current situation of the quality of the coastal areas, including Fresh Pond and Salt Pond. To become familiar with current activities of both NGOs and to get feedback from them that can determine a better approach for this project when designing activities.	In person meeting	Interest Groups- Nature Foundation (NGO), Environmental Protection in the Caribbean (NGO).	
	November 2023	Presentation of main objectives of the project Providing information about the project Expected impacts and mitigation measures. Information and operation of the GRM (purpose)	Public In-Person Meeting	Representatives of Community Councils of Cul de Sac: Mary's Fancy, Saunders, Ebenezer, South Reward, St. Peters, Bush Rd, St. Johns, Betty's State VROMI (Management and Technical Level) Police Department	NRPB(Project Management Team, Communications and E&S)
	November 2023	Public review and consultation of SEP to get feedback Disclosure of ESCP and LMP	On-line Review with feedback loop – responses can be sent to the Project email address swmp@nrpbxm.org . The mobile phone number (721 586 5680) is provided on the project flyer also as a means to give feedback and seek clarification on the project.	General Public	

² In person meeting scheduled in the context of a WB preparation mission.

PRE-APPRAISAL CONSULTATIONS GOVERNMENT- AND WTP REPRESENTATIVES

On March 16, 2023, in the context of a World Bank mission, the NRPB discussed the priority investments for the upgrading of the wastewater treatment plant, network expansion, and the capital expenditure required for it. Staff members of VROMI and WWMM (private contractor) were provided insight into the proposed scope of the project. These conversations allowed for the making of a more accurate evaluation of the WTP conditions and estimation of required upgrades. A visit to the WTP was carried out with technicians from the private company that operates the plant and some VROMI staff (civil servants).

Feedback received was considered useful in improving the planned interventions and consequently the ToR for design and supervision to be launched before the end of 2023. This was therefore integrated into the technical activities to be implemented by this project. The initially identified technical problems related to the settling tank became irrelevant once technicians explained the real performance problems, flow control limitations and lack of land availability to potentially expand infrastructure and improve efficiency. Consequently, the improvement of tertiary treatment was replaced by an investment in a more efficient dewatering system that will cope with the problem of the limited drying beds.

PRE-APPRAISAL CONSULTATIONS WITH NGO REPRESENTATIVES

A consultation was also held with the NGOs Environmental Organizations Environmental Protection in the Caribbean (EPIC) and Nature Foundation. The purpose of the consultation was to inform the groups of the proposed project, receive feedback and gain a better understanding of the current situation of the quality of the coastal areas, including Fresh Pond and Salt Pond. Also, the intention was to become more familiar with current activities of both NGOs related to water quality monitoring and to get feedback from them that can determine a better approach for this project when designing activities.

Based on the feedback from these NGOs, a proposal was made to implement a limited number of surface water quality testing sites, with the aim of determining, broadly, the current level of contamination in inland water bodies and coastal waters of SXM and the contribution of pollution from the WTP, as well as initiating the establishment of a baseline for future evaluation of project impact. This has been included in project activities and the commitment reflected in the ESCP.

NRPB drafted a ToR for the initial water and sludge quality testing, including details on locations, parameters to be measured, and frequency of measurement. The RfB was launched and the expressions of interest are currently being evaluated. Award of the contract is scheduled for April 2024.

PRE-APPRAISAL CONSULTATIONS WITH OTHER RELEVANT MEMBERS OF THE COMMUNITY

Two additional consultations were held on November 6th, 2023, with different groups of stakeholders during each event, in the morning and evening respectively. The morning's session targeted civil servants, including the Department of Police, the Ministry of Public Health, and Ministry VROMI (the Department of Permits, Department of New Works, Department of Infrastructure and Management, Department of Domain Affairs and the Inspection Department).

The evening's consultation was held for members of the Community Councils, Community Foundations and Utility companies. The details of these consultations and the main recommendations received are provided in **Annex 1**. The Powerpoint presentation delivered during the sessions is provided in **Annex 2**.

Timely invitations were sent out, including a reminder (**Annexes 3 and 4, respectively**).

Representatives of four (4) Community Councils confirmed attendance. However, one person, the representative of the Community Council of Saunders, attended the meeting.

ACTIONS FOLLOWING THE CONSULTATIONS OF NOVEMBER 6, 2023

- **Sharing outcome of consultation**
Given the low attendance at the consultation for Community Councils, Community Foundations and Utilities, and in order to meet the goal of engagement with all the relevant stakeholders at this phase of project preparation, a summary of the consultation was shared with all those who were invited. Information about the project and the associated environmental and social risks was provided. The slides from the presentation were shared via email on November 27th (**See Annex 5**).

To date, December 5th, no responses have been received yet from the representatives of the Community Councils who were absent from the consultations and those who attended. Another reminder was sent out on 5th December to all. (**See Annexes 6 and 7**)

- **Enabling easier phone contact between NRPB and stakeholders:** A phone number has been established for engagement purposes throughout the project. This will be managed by the Project Manager until the Community Engagement Consultant is onboarded. The WhatsApp function is currently operational and a WhatsApp message was sent on December 6th, 2023 to all the stakeholders that were invited to the consultation that took place on November 6th (**See Annex 8**).

6.2 Stakeholder Engagement Plan

Table 3: Consultations Planned for Project Implementation Phase

Time Frame	Stakeholder Group	Purpose of Consultation/Topics to be Discussed	Consultation Method/Strategy	Status	Expected completion time/Status
Q4 2023	Wider community	Reminder to review the SEP and the ways to participate and provide feedback	Social media posts	Text prepared	Posted on December 6 th , 2023
Q4 2023	Targeted stakeholders (invited stakeholders)	Reminder to review the material from consultation on the project (PPT slides) and the ways to participate and provide feedback	E-mail follow up	To be sent out by PM	Sent out on December 5 th 2023
Q4 2023	Community members Cul-de-Sac area	Reminder to review the SEP and the ways to participate and provide feedback	Email and potentially through community group chats	Text is finalized. Phone number is operational.	WhatsApp message sent out on December 6 th 2023.
Q1 2024	Wider community	Inform on the project and the ways to participate and provide feedback	Radio spot	Text is being drafted	Repeated spot during specific time (TBD) in the month of February
Q1 2024	Wider community	Inform on the project and the ways to participate and provide feedback	Radio interviews by Director NRPB	To be scheduled with radio stations after elections	February (after elections)
Q1 2024	Wider community and targeted stakeholders	Inform on the project and the ways to participate and provide feedback	Animation video	In work plan of Communications	Expected launch in April 2024
Q4 2024	VROMI specifically Staff Bureau, VROMI/the Policy Department, and the Infrastructure Management Department. New Projects and Controller	Road Map to develop a strategy to strengthen the legal and regulatory framework for sustainable wastewater service provision Roadmap to develop a capacity strengthening strategy of the line Ministry (VROMI) for planning, regulation, and supervision of wastewater.	In person meetings		

		Roadmap to develop a national wastewater management strategy for Sint Maarten and mid/long-term implementation plans for phased expansion of a wastewater management system			
Q1 2024	Government Ministries/Departments VROMI (Policy Advisor, Staff Bureau; Policy Department; Infrastructure Management Department) Council of Ministers	Coordination of project activities	In person meetings		
Q1 2024	Emergency Services Fire and Ambulance Police Disaster Management	Consideration of access during civil works activities to conduct services. Traffic management	In person meetings		
Q1 2024	Community Councils (representing residents of the project affected areas); Residents of the affected areas	Providing information about the project Stakeholder engagement Access, inconveniences and other impacts Eg loss of income, dust, noise, traffic diversions, disruptions Mitigation measures Information on the GRM	Dissemination of written information. Emails, website, social and printed media In person meetings Digital flyers (particularly during project implementation (works like trenching etc) in WhatsApp and other social media for announcement of dates, schedules for interruptions etc		
	School Boards		Dissemination of written information.		
	Private Schools				
	Business Associations		Emails, website, social and printed media		
	Sports Associations				
	Churches		Public Meeting		

	Health Services		In person Meetings (particularly with the vulnerable groups and/or their representatives)		
	Utilities				
	NGOS/Interest Groups				
	Vulnerable Organisations for the Differently Abled				
	Solid Waste Haulers				
	Sludge Haulers				
	Current Staff of WWT Plant	Provide feedback for the technical assessment. To inform about the future arrangements.	In person meetings		
Q2 2024	VROMI	Gap Analysis of the legal and regulatory framework	In person meetings		
		Design of sewer network			
Q2 2024	Community Councils (representing residents of the project affected areas)	Providing information about the project Consultation on Cost Recovery system Mitigation measures (Placement and operation of Suggestion Boxes) E&S Instruments (Purpose and Disclosure) Information on GRM	Beneficiary Surveys Face to face meetings with Community Engagement Consultant, Project Team, Social and Communication Specialists Focus group discussions		
	School Boards	Traffic diversion that will affect access to schools, movement of students and staff			
	Private Schools	Disruption of school operations due to project activities (noise, dust etc) Expected impacts, safety and other mitigation measures			
	Business Associations	Traffic diversion that will affect access to businesses. Business that will be affected in supply chain regarding the interruption of schedules and working times Loss of income for businesses and a compensation framework Introduction and discussion of Cost Recovery system			
	Transportation Services				
	Taxi Associations				
	Sports Associations				
	Churches				
	Health Services				
NGOs					
Utilities	To coordinate with utilities eventual disruption of services (electricity, transport)				
	Vulnerable Organisations for the Differently Abled	Providing information about the project Expected impacts and mitigation measures Information and operation of the GRM (purpose)	Face to face meetings with the Project Team, including		

	The elderly, senior citizens associations, pensioners groups, proxies or family members of senior citizens		community engagement Consultant. Social media contact Flyers Focus group discussions		
	Solid Waste Haulers	Providing information about the project and long-term water monitoring plan	Face to face meetings with the Project Team		
	Sludge Haulers				
	Current Staff of the WWTP	Consultations with the Project Team and Consulting team to gather information on the plant; to discuss possibilities for improvement and the final decision by the Consulting team; and, due to the fact it can be foreseen that implementation of upgrades/rehabilitation of the plant will need to be undertaken while the plant is still in operations, a workplan should be developed to accommodate both parties for when interventions are being implemented at the plant and training be provided to plant staff and VROMI staff of the upgrades/rehabilitation measures.	Face to face and/or virtual meetings with project designers and implementing team		

6.3 Proposed strategy to incorporate the views of vulnerable groups

The project will carry out targeted stakeholder engagement with vulnerable groups to understand their concerns/needs in terms of project activities, accessing information, facilities and services and other challenges they face in their workplaces and in their communities, during project execution. Special attention will be paid to engage with women, who were identified as being a vulnerable group. The details of strategies that will be adopted to effectively engage and communicate with vulnerable groups will be considered during project implementation. ³

Table 4: Strategy for Engaging With Vulnerable Groups

Vulnerable Group⁴	Strategy	Preferred means of communication
Women and Children	Targeted consultations with women's groups	Focus group discussions Face to face discussions Social Media
Elderly	Consultations will be held with the elderly, senior citizens associations, pensioners groups, proxies or family members are encouraged to participate. Translator will be provided if required for English, Dutch, French, Creole or Spanish.	Telephone calls/Zoom Large print News paper Elderly organizations Word of mouth Face to face discussions
Differently-abled People	Depending on disability, a family member or friend might be asked to translate in sign language. Also early engagement (including through organizations for the differently abled) Venues selected for engagement/consultation will be universally accessible.	Telephone calls/Zoom meetings Newspaper Radio Social media– Face book, WhatsApp messages Flyers In-person meetings/consultations
Non-English-Speaking Groups	Consultations will be held in languages other than English (mainly Spanish and Haitian Creole) Needed for communication, pamphlets, community meetings, billboards etc Relevant languages spoken by Speakers/Presenters at Consultations. Translators present.	Radio Word of mouth Churches Hand-distribution of letters and flyers written in different languages.
Low-Income Households		Face to face discussions Focus group discussions Interviews with heads of households

Information will be disclosed as follows:

- (I) Stakeholder Engagement Plan will be published for public review, with a feedback loop.
- (II) The Labour Management Procedures will be disclosed on the NRPB website
- (III) The NRPB GRM is readily available on the NRPB website

- (IV) Public consultations are being planned as part of project preparation but will initially be limited to community councils in the immediate neighbourhood of the project and utilities companies. The actual extent of the wastewater network is still unknown extensive consultations will be carried out once a more advanced scope and draft design of the civil works is prepared.
- (V) Formats selected for stakeholder engagement include press releases, disclosure of documents on the NRPB website and consultation meetings.
- (VI) Language: The information on flyers and short messages will be in English and potentially translated to Haitian Creole and Spanish, where needed.

6.4. Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including through dissemination of reports on project environmental and social performance, implementation of the stakeholder engagement plan, the Grievance Redress Mechanism and on the project’s overall implementation progress.

This and other information about the project will be shared through various means:

Table 5: Stakeholder Engagement Activities for the Short, Medium and Long Term

Time Frame	Activity	Description/Content/Purpose
Short Term - Immediate	Newspaper advertisements and radio announcements, postings on NRPB website and social media platforms	General information about the project, goals, NRPB contact information and SEP (See Annex 9 for Social Media post to review SEP). A newspaper advertisement will be published on 11 th December.
Medium Term – Jan 2024	Radio Interview with Project Team	Information about the project, the expected environmental and social risks and mitigation measures
Long Term – Before and During Project Implementation	Animation video	Information about the project, the expected environmental and social risks/impacts and mitigation measures; GRM

The Project and Communications teams are in the process of planning these additional consultation activities. Furthermore, a WhatsApp number (+1-721-5865680) has been established to share information on the project with and receive feedback from stakeholders. Stakeholders will be invited to review the documents and provide feedback on the project and the instruments prepared for the project, which have been uploaded on the project website. The mobile phone is currently being managed by the Project Manager.

Draft WhatsApp Message to Stakeholders:

Dear Stakeholder, NRPB is working on an upcoming Wastewater Management Project and your organization has been identified as a key stakeholder for the project. You can now visit the project’s webpage at <https://nrpbxm.org/projects/swmp/>.

You are invited to review and provide feedback on the following documents uploaded on the webpage by December 14, 2023.

- (i) *Environmental and Social Management Plan – Sewage Network*
- (ii) *Outline for the Environmental and Social Management Plan – Wastewater Treatment Plant*

(WTP)

(iii) Stakeholder Engagement Plan

You may also seek clarification about the project by sending a message to this number 721 586 5680.

Thank you for your support!

7 Resources and Responsibilities for Implementing Stakeholder Engagement Activities

7.1 Resources

The Project Team, in collaboration with the Communication and E&S Departments, will be in charge of stakeholder engagement activities.

The budget for the SEP is included in Component 3 of the project.

Table 6: Budget for SEP

Budget categories	Quantity	Unit costs	Times/ Years	Total Costs USD	Remarks
Estimated Staff salaries * and related expenses					
1 Estimated salaries for Community Engagement Specialist Consultant	1		5	TBD	
2. Events					
2a. Project launch meetings	5	2,000.00	--	10,000.00	Government Authorities
2b. Organization of focus groups (during Project Implementation Phase)	5	2,000.00	--	10,000.00	Beneficiaries
3. Communication campaigns					
3a. Posters, flyers, billboards	TBD		--	10,000.00	
3b. Social media campaign	SUM			25,000.00	
5. Beneficiary surveys					
5a. Pre-project perception survey				5,000.00	To include training of enumerators
5b. End-of-project perception survey				5,000.00	
6. Grievance Mechanism					
6c. GM communication materials				5,000.00	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET: (ESTIMATE)				70,000.00	

7.2 Management Functions and Responsibilities

The project implementation arrangements are as follows:

The project team will be composed of a Project Manager, a Technical Specialist on Sewerage Engineering and a Community Engagement Consultant, that will assist the Project Manager during the implementation period. The Technical Specialist will oversee the supervision of all construction and engineering related to this project, which consists of the extension of the sewerage network and the upgrade of the WTP. A Community Engagement Consultant will be needed to manage the social aspects related to this project because the impact of the implementation process on the population will be considerable. This Consultant will coordinate actions and activities with the NRPB E&S team that oversees the implementation of the SEP.

The Project team will be supported by designated specialists from the NRPB's E&S, Communications and Procurement departments. That support will consist of permanent support in specific matters related to their own competencies both during implementation and reporting. The Communications Department will support in all public engagement efforts related to the project. Procurement will support the tender and contracting processes and ensure that these are aligned with WB policies.

The entities responsible for carrying out stakeholder engagement activities are:

NRPB: The Stakeholders' Engagement Plan was developed by the **NRPB's Environmental and Social Specialists in close consultation with the Project Team** to guide the communication and interaction with Stakeholders, including the project beneficiaries. The Project Manager is responsible for planning, organizing and carrying-out stakeholder engagement activities and is supported by the NRPB's Social Specialist and Communications Specialist.

The NRPB is responsible for overseeing all stakeholder engagement activities. Per activity, technical expertise will be hired to implement the project activities, including stakeholder engagement, for example through surveys, assessments, focus groups etc.

The Works Contractor is expected to develop a contract specific Stakeholders Engagement plan (to include a Grievance Redress Mechanism) as a component of the Contractor's Environmental and Social Management Plan (C-ESMP), in-line with the provisions of this SEP, which will focus on communicating with the nearby homes and businesses during the construction phase.

The **Environmental Social, Health and Safety (ESHS) Specialist** hired by the Works Contractor is the point person for management/development of the SEP for the Contractor. SEPs are site specific and should provide a mitigation plan for the negative environmental and social impacts identified in the ESMP prepared for the project. The plan should explain in detail, the activities for stakeholder engagement at the project site, following the provisions of the C-ESMP, also developed by the Works Contractor.

The ESMP for this project contains the requirements of the C-ESMP, and these requirements will be included in the Procurement Documents for potential bidders. The qualifications and experience

required for the position of Environmental and Social Specialist will be described in the Procurement Documents for the project.

The **Supervision Contractor, hired by the NRPB**, is responsible for ensuring that the Works Contractor develops and executes the formally prepared SEP, which provides effective mitigation measures for any environmental and social impacts outlined in the Contractor- ESMP.

The **Consulting firm** shall support NRPB in conducting stakeholder consultations and update the Environmental and Social Assessment (ESA) and Environmental and Social Management Plan (ESMP) based on consultations.

The **ESHS Specialist** hired by the Supervision Contractor is expected to monitor the works contractor's implementation of their SEP. Periodic reports with information relevant to the SEP will be described in these reports.

The **Community Engagement** Consultant shall play an important role in communicating and interacting with the affected persons within the Project's area of impact and will engage with the project affected people as per the Stakeholder Engagement Plan to ensure effective communication between affected people and the NRPB. The Consultant will support the collection of grievances, keep a grievance redress tracker, grievance register and grievance resolution records and will coordinate with NRPB colleagues on the resolution of grievances. The Consultant may also have a role in the investigation of a complaint and the resolution thereof. He/she also will provide support and assistance to the Project Manager in organizing workshops, meetings, and consultations with the beneficiaries and/or stakeholders.

8 Grievance Redress Mechanism

8.1 Description of GRM

The main objective of a Grievance Mechanism (GM) is to assist in the resolution of complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved.

NRPB has a Grievance Redress Mechanism (GRM) in place and available for all stakeholders. The updated GRM is disclosed on NRPB's website at: Complaints Procedure – National Recovery Program Bureau (<https://nrpbxm.org/complaints-procedure/>).

Table 7: Grievance Redress Mechanism

Step	Description of process	Timeframe	Responsibility
GM implementation structure	<p>The NRPB reports to the Government of St. Maarten, who reports to Parliament and the general public, and to the World Bank.</p> <p>The NRPB reports grievances as part of the regular and/or incidental safeguards reporting obligations to the World Bank, as prescribed in the safeguard tools for the respective projects.</p>	NA	
Grievance uptake	<p>Complaints can be submitted via the following means:</p> <p style="text-align: center;">C) NRPB’s website</p> <p>Ø Complaints Procedure – National Recovery Program Bureau (nrpbxm.org)</p> <p>2. Telephone</p> <p>Ø +1(721) 542-8886/7</p> <p>Ø The complaint form will be completed for you during the phone call, providing your name and contact details is optional.</p> <p>3. E-mail</p> <p>Ø Download and complete the complaint form at the link below:</p> <p>https://docs.google.com/forms/d/e/1FAIpQLScp07AeJ53-M_Piuf12j4owx_4d6m-MRO8BQCMDk06AfBI6g/viewform</p> <p>Ø E-mail the completed form to complaints@nrpbxm.org with “Complaint [name] Project” in the title of the e-mail. For example, “complaint Emergency Recovery Project I”. Providing your name and contact details is optional.</p> <p>4. Social Media – messages on the NRPB’s Facebook and LinkedIn Pages, respectively</p> <p>➤ SXM National Recovery Program Bureau (facebook.com)</p> <p>➤ https://www.linkedin.com/company/sxmnationalrecovery/mycompany/</p>		NRPB

	<p>5. By visiting the office during office hours</p> <p>Ø National Recovery Program Bureau #57 Walter A. Nisbeth Road Philipsburg Sint Maarten</p> <p>Ø The complaint form will be provided, for completion, for further processing of the complaint</p> <p>The NRPB will provide the necessary assistance in cases whereby complainants experience difficulty submitting a complaint. This could be, but is not limited to, recording the complaint (completing the form) for the individual.</p>		
Sorting, processing	<p>Where possible, complaints will be resolved at first contact with the NRPB and handled by a designated Complaints Officer. Complaints that are submitted via the website or e-mail, are automatically sent to the second Complaints Officer within the NRPB, to ensure complaints are received and recorded.</p> <p>Logged in[insert],</p> <p>Categorized according to the following complaint types: Levels 1, 2 and 3</p> <p>Level 1: The scale and scope are minor. Often related to minor non-performance of project obligations. The complaint is quickly remediable. When an answer can be provided immediately and/or NRPB is already working on a resolution.</p> <p>Level 2: The scope and scale are medium. It may relate to gross non-performance of project obligations or minor violations of the law. One-off grievance that requires considered response and actions/commitments to resolve complaint. The complaint is remediable but requires planned efforts.</p> <p>Level 3: The scale and scope are medium to major. High risk of the complaint being of an irremediable character, e.g. severe health and safety issue and/or law violations. Complaint may be of repeated nature and/or affecting an extensive area or group of persons. May requires significant, comprehensive action.</p>	First contact, upon receipt of complaint	NRPB Complaints Officer
Acknowledgement and follow-up	NRPB will acknowledge receipt of each complaint promptly within 5 working days. Communication will be made either verbally or in written form, or the Complainant's preferred contact method, as	Within 5 days of receipt	Complaints Officer

	indicated by the complainant on the Complaint Form. If required, the acknowledgement provides an opportunity to ask for any additional information or to clarify any issues.		
Verification, investigation, action	<p>Reviewing Complaints/ Investigation</p> <p>To investigate a complaint, the NRPB may:</p> <ul style="list-style-type: none"> - Gather information from the person, group or institution making a complaint - Gather information about the product, area or from the person that the complaint is about - Review other sources of information, as relevant. <p>A proposed resolution is formulated by... and communicated to the complainant by[<i>insert</i>],</p>	<p>Within 10 working days. As soon as possible, with a maximum of 6 weeks. Possibility to extend in complex cases, when needed.</p>	<p>The Review Panel will consist of Senior Management, as follows:</p> <ul style="list-style-type: none"> • Program Manager • Safeguards (Team) Coordinator • Legal Officer • External Expert (such as a government official) and • Any other NRPB Management Team member, upon request of the Panel (e.g Communications or Finance).
Monitoring and evaluation	<p>The NRPB will keep a Case Management System for entering, tracking and monitoring grievances.</p> <p>Data will be collected and compiled on the following:</p> <ol style="list-style-type: none"> i. the number of complaints received ii. the date the complaints were received iii. the projects that were subject of the complaint iv. the level and nature of the complaints v. the progress (and dates) on the steps of complaint resolution vi. the date the complaints were resolved 	...	NRPB

	<ul style="list-style-type: none"> vii. the outcome of complaints, including matters resolved immediately after receipt viii. systemic issues identified ix. the number of requests received for internal and/or external review of NRPB’s complaint handling. NRPB – Grievance Redress Mechanism Page 32 x. communication activities (internal and external) xi. capacity building activities for organizational capacity to operate the GRM 		
Provision of feedback	<p>The NRPB will keep the complainant updated on the progress, particularly if there are any delays. Time frames for progress updates will depend on the nature of the complaint. Situations where complaints are complicated, or require extensive investigation, will result in extended time for the provision of updates.</p> <p>After the investigation of the complaint, NRPB will consider how to address it. Complaints will be addressed as soon as possible, in any case within six (6) weeks, with an extension possibility for complex cases. The complainant will be informed accordingly. If a person prefers or needs another person or organization to assist or represent them in the making and/or resolution of their complaint, NRPB will communicate with them through their representative if this is their wish.</p>	...	NRPB
If relevant, payment reparations following complaint resolution	<p><i>If outcome of complaint process is that the resolution is an offer for financial compensation, the complainant is requested to share how they wish to receive the compensation, e.g. on which bank account. NRPB continues to follow the regular administrative process; advice, payment certificate and ultimately a signed confirmation of receipt by the complainant. Documentation is kept as part of the file.</i></p>	As soon as possible, max. of 6 weeks, with possibility to extend in complex cases, when needed.	NRPB

9 Monitoring and Reporting

9.1. Summary of how SEP implementation will be monitored and reported upon (including indicators)

The monitoring and reporting on the SEP is essential to the successful implementation of the project. Meaningful monitoring of the SEP will be a collaborative effort of the Project Team, the E&S Department of the NRPB and the stakeholders.

The monitoring of the SEP will be conducted on the following bases:

- The Use of the Grievance Redress Mechanism
- Effectiveness of engagement activities
- Volume of Implementation of Planned Activities

Table 8: Monitoring and Reporting on the SEP

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
GRM. To what extent project-affected parties have been provided with accessible and inclusive means to raise issues and grievances, and has the NRPB responded to and manage such grievances.	<ul style="list-style-type: none"> • Are project affected parties raising issues and grievances? 	<ul style="list-style-type: none"> • Usage of GRM and/or feedback mechanisms • Requests for information from Community Councils and NRPB • 	<p>Records from the NRPB GRM</p> <p>Records from the Community Councils</p>
Stakeholder engagement. How has engagement activities made a difference?	<ul style="list-style-type: none"> • Was there a level of interest and support for the project? • Were inclusive engagement achieved on topics that could affect parties? • Were the priority information disclosed to relevant parties? 	<ul style="list-style-type: none"> • active participation in activities • parties whose members were actively engaged in predefined topics • Integration of changes resulting from applicable feedback to project design, implementation • 	<p>Stakeholder Consultation Attendance Sheets</p> <p>Feedback from consultations (responses to end of consultation evaluation forms)</p>
Implementation effectiveness. Have we been effective in implementation?	<ul style="list-style-type: none"> • Were the activities implemented as planned? Why or why not? • Was the stakeholder engagement approach correct? Why or why not? 	<ul style="list-style-type: none"> • % implementation of SEP activities • key barriers to participation identified with key stakeholder representatives 	<p>Communication Strategy (Consultation Schedule)</p> <p>Periodic Focus Group Discussions</p> <p>Face to face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives</p>

9.2 Involvement of stakeholders in monitoring activities

Given that the project is very complex and covers a large geographic area, stakeholders at various levels will be actively involved in the monitoring of the implementation of the SEP. Stakeholders and representative groups and associations from the various project affected areas will be involved in the development of a monitoring system for the SEP during project implementation. Consultations will be held early in project preparation to gather input from stakeholders for the development of this system. A summary of consultations held with stakeholders can be found in Section 6.

Annex 1: Feedback from (Public) Consultations

Consultation With Representatives of Interest Groups

March 2023

Date: 16 March 2023

Objective: To discuss with VROMI project managers and private contractors that are currently operating the Sint Maarten municipal wastewater treatment plant (WWTP) the identification of priority investments for its upgrading and the capital expenditure required for it.

Participants:

VROMI
[REDACTED] – Project Manager at the New Projects Department [REDACTED] Project Manager at the New Projects Department [REDACTED] – Contract Manager – Infrastructure Management
WWMM
Jan Vissen – Contractor by VROMI
WB
[REDACTED] – Senior Water and Sanitation Specialist, project TTL [REDACTED] – Lead Water and Sanitation Specialist, co-TTL [REDACTED] – Environmental Specialist [REDACTED] Senior Social Development Specialist [REDACTED] – Young Professional [REDACTED] – Senior Wastewater Treatment Consultant
NRPB
[REDACTED] – Project Manager [REDACTED] Interim Project Coordinator [REDACTED] Environmental Specialist [REDACTED] – Social Specialist [REDACTED] Junior Environmental Specialist

Development of the session

A visit was conducted to the A. T. Illidge Road wastewater treatment plant (WWTP) taking the opportunity of the presence of the WB team during the preparation mission that took place in March 2023.

Discussions were held with VROMI managers and private contractors that operate the WWTP to gather additional information on operational aspects of the plant. These conversations allowed making a more accurate evaluation of the WWTP conditions and estimation of required upgrades.

The mission identified the following findings:

- The operators are motivated and do a satisfactory job, despite the given difficulties and financially restricted conditions.
- The key problem appears to be lack of funds for maintenance and repair. There is no budget for such activities available. Whenever financial funds for maintenance or repair are needed, this requires a case-specific application to VROMI.
- WWTP operates at about 65% of its hydraulic capacity (average pollution load being about 50% of design capacity). This hydraulic load is less than initially assumed, since it was learnt that the existing pumps are worn out and deliver less flow than was expected.

- The Sludge Drying Beds have not experienced replacement / cleaning of the filter media for many years (if ever) and were informed to require up to 3 months for proper sludge drying.
- VROMI issued specific requirements of effluent's fecal coliform concentrations (300 MPN/100mL) through in the WWTP's Hindrance Permit HP.12.006.

Conclusions

- The earlier need to construct a second sedimentation tank (as advised by the initial technical assessment), could be dropped, implying a reduction in the initial estimated costs for the required upgrades of the WWTP.
- Some equipment replacement is needed, like Inlet pumps, a partial rehabilitation of Drying Beds, a new mechanical sludge dewatering stage, chemical precipitation facilities for phosphorus removal, disinfection of treated effluent, flow measurement, tools and spare parts, plus the adherent consulting firm services.
- An improvement of the automation and SCADA (Supervisory Control and Data Acquisition) is recommendable to enhance the operations.
- Disinfection equipment is needed to accomplish the requirements of VROMI's Hindrance Permit HP.12.006.

2) Consultation With Representatives of Environmental NGOs

Date: 16th March 2023

Participants:

World Bank	
██████████	- Senior Water and Sanitation Specialist
██████████	-Lead Water and Sanitation Specialist
██████████	- Environmental Analyst
██████████	- Young Professional
██████████	- Senior Wastewater Treatment Specialist-STC
██████████	I -Senior Wastewater Treatment Specialist-STC
NRPB	
██████████	- Senior Program Manager
██████████	- Project Manager
██████████	- Interim Project Coordinator
██████████	- Head of Environmental and Social team
██████████	- Environmental Specialist
██████████	- Junior Environmental Specialist
██████████	- Environmental Specialist Consultant
Environmental NGOs	
<u>Nature Foundation</u>	
██████████	- Managing Director
<u>Environmental Protection in the Caribbean</u>	
██████████	President of the Board
██████████	Member of the Board

Reports

A thematic meeting was held with two NGOs working on surface water quality aspects in SXM: the Nature Foundation (NF), and the Environmental Protection in the Caribbean (EPIC). This meeting was organized during the pre-appraisal mission of the World Bank in March 2023.

Both NGOs were consulted to get a better understanding of the current situation of the quality of the coastal areas, including Fresh Pond and Salt Pond. Also, the intention was to be familiar with current activities of both NGOs and to get feedback from them that can determine a better approach for this project when designing activities.

Current situation

- There is not a permanent wastewater quality and coastal/surface water monitoring system. This question is essential for the integrated management of wastewater system and protection of the aquatic environment.
- While Sint Maarten has standards for wastewater effluent quality, it is unclear whether or how well the WWTP complies with these standards since there is very limited information on the quality of the effluents of the WWTP since there are no regular water quality monitoring procedures.
- There is only limited/ incidental data on the quality of coastal and surface waters even on highly threatened water bodies in the vicinity, like Fresh Pond and Great Salt Pond, or the nearby beaches i.e. Great Bay.
- Information on seawater quality in the island is limited, however, but there is availability of some punctual information on basic water quality parameters of seawater in few locations along the island coast obtained by their monitoring campaigns.

Feedback and recommendations

- It was agreed on implementing a limited number of surface water quality testing sites as part of project appraisal, with the aim of determining, broadly, the current level of contamination in inland water bodies and coastal waters of SXM and the contribution of pollution from the WWTP, as well as initiating the establishment of a baseline for future evaluation of project impact.
- NRPB will draft a ToR for the initial water testing, and details on locations, parameters measured, and frequency of measurement will be discussed and agreed upon between the WB and NRPB in the next stage of project preparation.

3) Consultation With Representatives of Interest Groups

Date: 6 November 2023

Objective: Inform civil society representatives about the objectives, components and activities of the project, emphasizing the direct impact on the population during and after the interventions.

Organization: Two sessions were organized to focus on different matters, according to the audience:

- 1) 15:00 h session with staff members of VROMI, the Ministry of Health and the Department of Police.
- 2) 18:30 h session with representatives of districts and utilities that will be directly affected by and benefit from the project.

Session 1

Participants:

VROMI	
██████████	– Department of New projects
██████████	– Contracts Manager
██████████	– Policy Advisor
██████████	– Department of Inspection
██████████	– Department of Inspection
Police Department	
██████████	– Sewage Plant Project
NRPB	
██████████	– Project Manager
██████████	– Program Manager
██████████	– Head of E&S
██████████	– Social Specialist

Development of the session

A presentation was conducted by the Project and Environmental and Social Teams to introduce the general aspects of the projects to the audience. This presentation was divided into two different parts. The first one was dedicated to the technical aspects of the activities, including the infrastructures and the interventions to improve the legal framework and capacity building. The second one introduced the elements of the environmental and social aspects that are impacted by the project and their mitigation measures.

Once the presentation was finalized, a round of questions was opened to the participants. The questions and their answers were:

- How will the maintenance be ensured after infrastructure's improvement?

The sustainability of the infrastructure must be ensured by the national budget through a cost recovery mechanism which is addressed by this project. In Component 2 there is a specific activity to support the government to identify and choose the best financial mechanism to ensure the sustainability of wastewater management through combination of government transfers, taxes and introduction of user tariffs.

- Which is the first priority in terms of areas of intervention?

Expansion of the existing sewerage network to enable the connection for residents and commercial enterprises. The priority project areas that will be covered by the project include Greater Cul de Sac, and it could be extended in case of funds availability to other areas following the Government's priorities.

- Will informal housing and the decentralized treatment system be addressed by this project?

Constructions and sewerage infrastructures that are not included in the area of influence of this project will not be reached because of the budget limitations.

- Will the sewerage problems of the Dutch Quarter be addressed by this project?

Due to the budget limitations, Dutch Quarter and other neighborhoods that are not included in Cul de Sac will not be benefited. There is a EU funding opportunity for the government to expand the sewerage infrastructure project done in 2019 but it is out of the competencies of NRPB.

- Could the Dutch Quarter be connected to the French side?

Apart from the fact that this area is out of the area of intervention of this project, transboundary initiatives are out from the scope and competencies of the NRPB.

- Are there any synergies and coordination with the solid waste project?

Yes, and a joint initiative will be developed to tackle the question of the fee collection to ensure sustainability to both sectors at the same time.

Conclusions

- This information session was important and needed for the audience as they feel that any initiative in this domain has to be coordinated with the governmental institutions.
- VROMI staff has a lot of technical information that is deemed useful for the proper design of the project. The staff express their availability to collaborate during the future design phase.

Session 2

On Wednesday October 25th invitations were sent (from the email address info@nrpbxsm.org) to members of community councils and representatives of the districts belonging to Cul de Sac:

- Mary's Fancy : [REDACTED]
- [REDACTED] Saunders: [REDACTED]
- Ebenezer: [REDACTED]
- South Reward: [REDACTED]
- St Peters: [REDACTED]
- Bush Road: [REDACTED]
- St Johns
- Betty's Estate

(Note: Invitation is included in the folder available at the link provided on page 15: Documentation - Consultation efforts)

At the same time, invitations were sent to the representatives of the four utilities that are included in the Stakeholder list to be consulted before appraisal:

- GEBE
- Telem
- Flow
- Scarlet

The invitation contained the subject of the consultation and information about the venue and the date and time. Prior to the meeting, invitees were called for confirmation of their attendance.

A community center in the center of Cul de Sac was reserved to facilitate attendance. The meeting was scheduled for 6PM, to avoid overlapping with work- and school hours.

On Friday November 3rd a reminder was sent, via email, to all the invitees to which four of them responded positively, confirming their presence at the meeting. Some of them called NRPB reception to ask for the venue and to also confirm their participation.

Despite all efforts to gather all representatives of the districts, just one person attended the meeting the NRPB team decided to proceed.

Participants

District of Saunders
██████████ – Head of Community Council
NRPB
██████████ – Project Manager
██████████ – Program Manager
██████████ – Head of E&S

A presentation was conducted to introduce the general aspects of the projects to the participants. Following the same approach as the previous session, this presentation was divided into two different parts. The first one was dedicated to the technical aspects of the activities, including the infrastructures and the interventions to improve the legal framework and capacity building. The second one introduced the elements of the environmental and social aspects that are impacted by the project and their mitigation measures.

Once the presentation was finalized, a round of questions was opened to the participant. The questions and their answers were:

- Will the solid waste problem be tackled by this project?
No, but there is another one, the EDMP, that is currently under implementation and its objective is to improve the solid waste collection and treatment in int Maarten.
- How will the wastewater pipes be connected?
The existing main pipe in the center road will gather all the secondary pipes that will be connected to the buildings. This main pipe has to be inspected and repaired if needed as part of the project.
- Is any further information available to be shared with the population?
Yes, the NRPB website contains information that is useful for beneficiaries. Also, NRPB is always available to provide the needed information to the community and beneficiaries.
- Will the expected duration of the project be the same all over the area?

No, the way of implementing the network is progressive. Not all streets will be affected during the whole period of the project, which is 3 years. Every area and street will be affected for a specific number of days or weeks, but not for 3 years.

- What will happen to the families that currently use septic tanks?

The properties that will be connected to the sewerage network will not need the septic tank anymore. The demolition and condemnation of those tanks is an activity to be funded by the project.

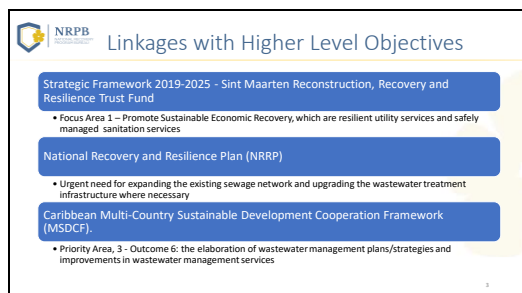
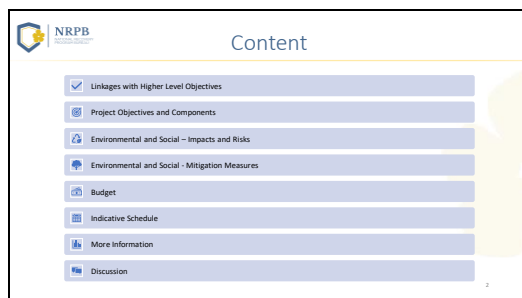
Conclusions

This information session was important and needed for the audience as the beneficiaries need to be informed of the projects that will have an impact on the community. However, the fact that some similar consultations have been held for other projects and those meetings generally share limited information due to the preliminary stage of the projects, seem to make participants progressively reluctant to attend due to a lack of sense of urgency. The conclusion is that once the infrastructures design begins to be defined and the streets and properties that will be affected are known, people will become more interested in seeing and discussing the proposed options in future consultations.

To date, no feedback has been received on the emails that were sent to both those who attended the consultations and those who did not participate. Another email will be sent to remind all stakeholders that the channels for submitting comments and suggestions remain open and that they are invited to participate and send their valuable contributions.

Annex 2

Stakeholder Consultation Presentation



NRPB

Project Objectives and Components

Objectives

- Increase access to safely managed sanitation services
- Improve sustainability and resilience of wastewater management

Components

1. Wastewater infrastructure investment	2. Policy and institutional development, and surface and sea water quality monitoring
1.1. Wastewater collection 1.2. Upgrade of existing A. T. Illidge Road WWTP	2.1. Capacity strengthening of the line Ministry (VROMI) 2.2. Strengthening of the legal and regulatory framework for sustainable wastewater service provision 2.3. Development of a national wastewater management strategy 2.4. Establishment of a system for monitoring seawater and surface water quality

4

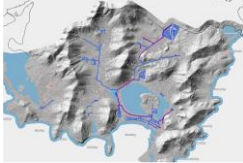
NRPB

Component 1

1. Wastewater infrastructure investment

1.1. Wastewater collection

- Expansion of the existing sewerage network to enable the connection for residents and commercial enterprises.
- Rehabilitation of critical parts of the existing sewage system.
- Review and development of locally appropriate standards for safe containment, collection and treatment of fecal sludge.



5

NRPB


Component 1 cont.

1. Wastewater infrastructure investment


1.2. Upgrade of existing A. T. Illidge Road WWTP

Enable the treatment of both the flows from:

- the existing network
- additional wastewater flows that will be collected through the Project financed sewerage network expansion.



6

 **Component 2**


2. Policy and institutional development, and surface and sea water quality monitoring

2.1. Capacity strengthening of the line Ministry (VROM)

Planning, Regulation, and Supervision of Wastewater Services in the following areas:

- Wastewater management, treatment processes, monitoring and compliance with regulatory standards.
- Efficiency, effectiveness and sustainability of operations through improved:
 - governance structures
 - organizational capacity
 - strategic planning
- Stakeholder engagement and coordination.
- Monitoring, evaluation and reporting mechanisms to facilitate evidence-based decision-making.

7

 **Component 2 cont.**


2. Policy and institutional development, and surface and sea water quality monitoring

2.2. Strengthening of the legal and regulatory framework for sustainable wastewater service provision

> **Building on existing plans and ordinances.**

- Optimal financially viable wastewater management model.
- Cost recovery principle.
- Enhance the private sector role for operation of the wastewater system.
- Service provider's operational, financial, and institutional capacity to cope with disasters.

8

 **Component 2 cont.**


2. Policy and institutional development, and surface and sea water quality monitoring

2.3. Development of a national wastewater management strategy

Plans for safe management of sanitation for the entire population of Sint Maarten, especially those in the neighborhoods that will take time to be connected or will not be connected to the formal sewerage network.

> WB Citywide Inclusive Sanitation (CWIS) initiative's guide on connection programs, including social, financial, policy/institutional/regulatory and technical aspects.

9

 **Component 2 cont.**


2. Policy and institutional development, and surface and sea water quality monitoring

2.4. Establishment of a system for monitoring seawater and surface water quality

National and standardized system for seawater and surface water quality monitoring, with a particular focus on bathing waters quality monitoring:

- coastal waters
- existing inland ponds

10

 **Environmental and Social – Impacts and Risks**

Positive impacts

- Reduction of water (ground water, channels, ponds, lagoons, coastal waters) and soil pollution
- Improvement of quality of life of residents, visitor experience.


Environmental risks

- Operation of the WWTP: emissions to soil, water and air, odors, increased energy consumption, handling and disposal of dewatered sludge.
- Expansion of the sewer network: traffic disruption, noise, dust, excavation debris, safety of road users

Social risks

- Temporary interruptions to the normal operation of businesses.
- Potential restriction or limitations to access to properties and businesses.
- Cost implications for commercial businesses to connect to the expanded sewer network.
- Cost recovery approaches with financial impacts for users.
- Occupational health and safety risks during works.
- Labour risks
- Concerns and grievances from the community about the project. The GRM can be accessed online, on the NRPB's website and in person, at the office of the NRPB.

11

 **Environmental and Social - Mitigation Measures**

- An **Environmental & Social Assessment** will be carried out for the current operation of the WWTP, upgrade and future operation.
- Based on the results of this assessment, an **Environmental & Social Management Plan** will be prepared, with all relevant details of how to mitigate the risks and impacts of the WWTP upgrade and operation.
- For the expansion of the sewerage network, a separate **Environmental & Social Management Plan** will be developed, which will describe the mitigation measures related to road safety, traffic arrangements, accessibility to houses/businesses, noise/dust from excavation works.
- During the different stages of the project, NRPB will ensure that the public is informed and consulted, by utilizing different media/channels per case, according to the **Stakeholder Engagement Plan** that is being prepared for the project.

12

NRPB Environmental and Social - Mitigation Measures (cont.)

- The cost for residences being connected to the expanded sewerage network will be covered by the project's budget.
- The project will exclude any activities that may result in land acquisition or resettlement of people.
- **Labour Management Procedures (LMP)** describes the requirements and expectations of the NRPB and contractors in terms of compliance, reporting, roles & responsibilities, monitoring and supervision with respect to labour and working conditions during the implementation of the project.
- NRPB has a Grievance Redress Mechanism to assist with addressing complaints and grievances occurring as a result of the project, in a timely, effective and efficient manner.

13

NRPB Budget

Total budget: 25 M USD


Funding Sources		Distribution of Funds	
15 M USD	Government of Sint Maarten	Component 1:	20 M USD
10 M USD	Trust Fund St. Maarten	Component 2:	3 M USD
		Component 3:	2 M USD

14

NRPB Indicative Schedule

	2023		2024		2025		2026		2027		2028	
	S1	S2	S1	S2	S1	S2	S1	S2	S1	S2	S1	S2
Project Approval												
Design Phase												
Civil Works												

15

 **NRPB**
NATIONAL RECOVERY PROGRAM BUREAU

Recap: Highlights and Key Messages

- New wastewater infrastructures and rehabilitation of existing ones
- Seawater and inland ponds water quality monitoring system
- Positive impacts:
 - ✓ Reduction of water and soil pollution
 - ✓ Improvement of health and wellbeing benefits of communities and tourists.

16

 **NRPB**
NATIONAL RECOVERY PROGRAM BUREAU

More Information & Discussion

<https://nrpbxm.org/swmp/>

Scan for more info 

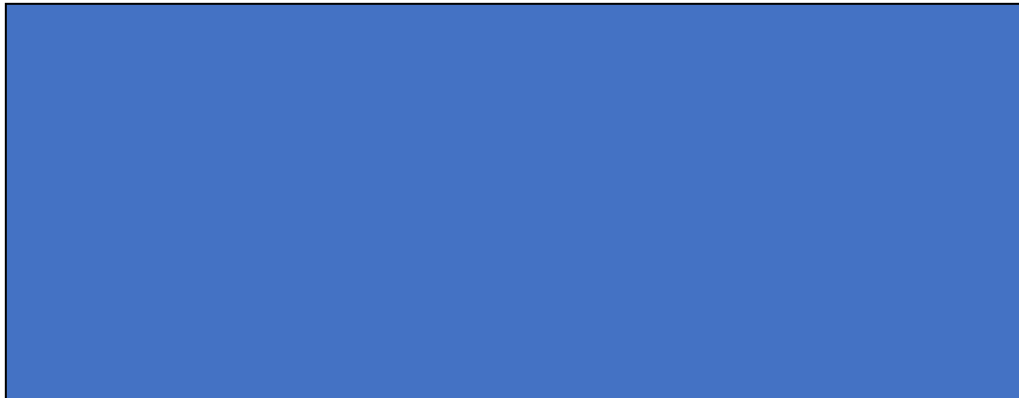


NATIONAL RECOVERY PROGRAM BUREAU

17

Annex 3: Consultation With Representatives of the Community - Email Sent to Invitees

Date invitation email was sent: 25th October, 2023



I hope this email finds you well. We are pleased to invite you to an upcoming event focused on wastewater management, where we will provide valuable information and seek your input to enhance our efforts in this critical area.

Event Details: See attached flyer.

At the National Recovery Program Bureau, we recognize the importance of effective wastewater management in preserving our environment and ensuring public health. We believe that collaborative efforts and input from stakeholders like you are essential.

During the session, you can expect the following:

- Presentation on Current Wastewater Management Project: Presented by the NRPB Project team.
- Feedback and Q&A Session: We value your insights and questions. Your feedback will help us refine our strategies and initiatives further.

Please RSVP by Thursday, November 2nd, 2023, to confirm your attendance. Your participation is crucial to the success of this event.

If you have any questions or require further information, please do not hesitate to reach out to us at +1 721 542-8886/7 / info@nrpbxm.org.

Thank you for your dedication to environmental sustainability, and we look forward to your presence at the wastewater management information and feedback session.

Best regards,



National Recovery Program Bureau

#57 Walter J.A. Nisbeth Road
Philipsburg, Sint Maarten
info@nrpbxm.org

NRPB : +1(721) 542-8886/7

www.nrpbxm.org

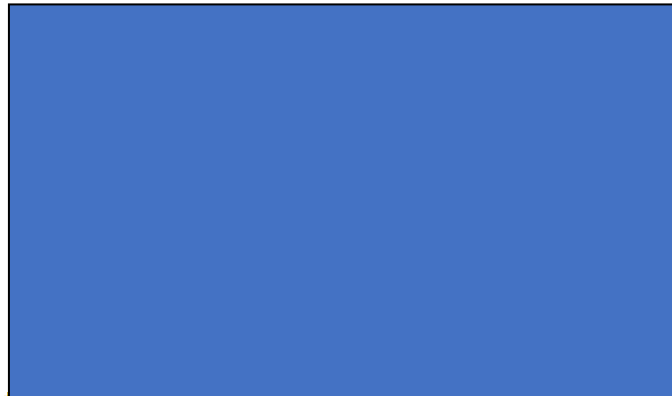
Annex 4: Reminder Email

Date reminder email was sent: 2nd November, 2023



Thank you for your assistance in this matter!
Kind reminder to the Department heads to please RSVP for the event.

Kind regards,



www.nrpbsxm.org



This email and any files transmitted with it are confidential and intended solely for the use of the individual not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender if you have received this e-mail in error and delete this e-mail from your system. If you are not the intended recipient you are notified any action in reliance on the contents of this information is strictly prohibited.



Annex 5: Consultations representatives Community Councils – and Utility companies - Email Sent to Absent Invitees (with Presentation Slides and Project Summary)

Date Email Was sent: 27th November, 2023



Subject: RE: Waste water project meeting October 6th
Attachments: Briefing Wastewater.pptx

Dear all

Please find attached the presentation that NRPB made on November 6 on the sewer network project.

Kind regards



Sent: Friday, October 6, 2023
Subject: Waste water project meeting October 17th

Dear

I hope this email finds you well. We are pleased to invite you to an upcoming event focused on wastewater management in **St. Peters Community Center**, where we will provide valuable information and seek your input to enhance our efforts in this critical area.

Event Details: See attached flyer.

At the National Recovery Program Bureau, we recognize the importance of effective wastewater management in preserving our environment and ensuring public health. We believe that collaborative efforts and input from stakeholders like you are essential.

During the session, you can expect the following:

- Presentation on Current Wastewater Management Project: Presented by the NRPB Project team.
- Feedback and Q&A Session: We value your insights and questions. Your feedback will help us refine our strategies and initiatives further.

Please RSVP to confirm your attendance. Your participation is crucial to the success of this event.

If you have any questions or require further information, please do not hesitate to reach out to us.

Thank you for your dedication to environmental sustainability, and we look forward to your presence at the wastewater management information and feedback session.

Best regards,



The banner features the NRPB logo in the top left corner, which includes a shield with a flower and the text "NRPB NATIONAL RECOVERY PROGRAM BUREAU". The main title "WASTE WATER PROJECT MEETING" is displayed in large, bold letters, with "WASTE WATER" in white and "PROJECT MEETING" in yellow. Below the title, the subtitle "Information and feedback session for the Waste Water Management project" is written in a smaller, italicized font. A yellow button with the text "JOIN US" is located at the bottom left of the banner. The background is dark blue with abstract yellow and light blue curved shapes on the right side.



Annex 6: Request for feedback on SEP - Email Sent to stakeholders



Subject: Draft Stakeholders Engagement Plan (SEP) for the NRPB's Wastewater Management Project
Attachments: SEP-SXM-Wastewater-management-project.pdf

Dear Stakeholder

Attached you will find the Draft Stakeholders Engagement Plan (SEP) for the National Recovery Program Bureau's (NRPB's) "Wastewater Management" Project and related activities:

The Stakeholders Engagement Plan (SEP) is a guide to the outreach and information disclosure plans of the "Wastewater Management" Project as it moves through critical milestones. The SEP recognizes the importance of open and transparent engagement between the project implementer, project beneficiaries, and other stakeholders as an essential element of good international practice.

Why are you receiving this email?

The NRPB would like to invite you to review the Draft SEP for the "Wastewater Management Project.

The Wastewater Management Project will focus on increasing access to safely managed sanitation services and improving sustainability and resilience of wastewater management.

The project will consist of 3 components: 1) Wastewater infrastructure investment, 2) Policy and institutional development, and surface and sea water quality monitoring and 3) Project Management.

The objective of this public consultation period is to ensure that all affected parties are informed and able to express their perspectives. This ensures that relevant concerns and potential impacts of the project are taken into account. As a direct stakeholder, we especially want to hear your concerns, if any, and this email is thus being sent to facilitate your access to the attached draft Stakeholders Engagement Plan (SEP).

What is needed from you?

We appreciate your feedback on this Plan! If you could please review the document and send your comments/suggestions to us via swmp@nrpbxsm.org by December 10th we can make sure to consider the received feedback in the preparation of the final document.

The documents can also be found on our website: <https://nrpbxsm.org/wp-content/uploads/2023/11/SEP-SXM-Wastewater-management-project.pdf>

Annex 7: Email sent on 5th December 2023 with Reminder to Stakeholders to Provide Feedback on the Project and the SEP



Reminder - Waste water project meeting October 6th.oft

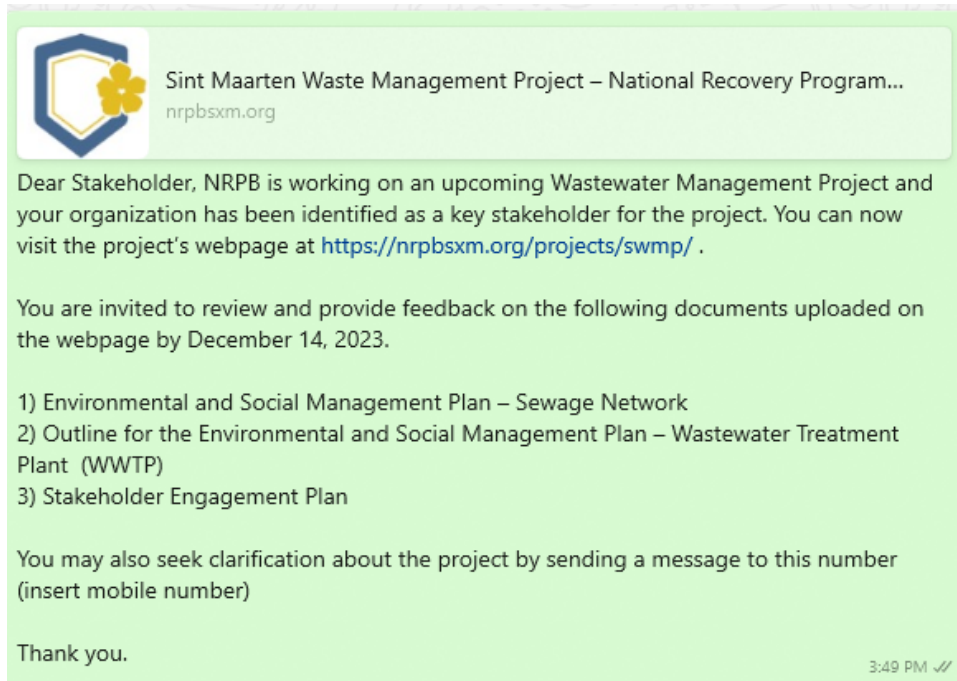
Dear Stakeholder

This is a gentle reminder for your review of the Stakeholder Engagement Plan and the presentation for the NRPB's Wastewater Management Project. We would greatly appreciate your feedback on these documents, which are attached to this email, by December 14th.

Your input will make a difference while we continue in the planning, design and eventual implementation of the project.

Thank you for your support.

Annex 8: WhatsApp message sent to stakeholders



Annex 9: Facebook Post of Project SEP (With Request to Review)



The graphic is a blue rectangular poster with a white megaphone icon in the top left. In the top right, there is the NRPB logo (National Recovery Program Bureau) featuring a shield with a flower. A large yellow rounded rectangle in the upper center contains the word "CONSULTATION" in white capital letters. Below this, the text reads: "Project: Wastewater Management Project", "Document: Stakeholder Engagement Plan", "Date: November 2023", and "Status: Draft". A paragraph follows: "We are requesting your feedback on our draft Stakeholder Engagement Plan. This plan is designed to ensure effective engagement between various stakeholders throughout the lifecycle of the Wastewater Management project." In the bottom left, there is a white rounded rectangle with a blue play button icon and the text "SEND US YOUR FEEDBACK!". At the bottom left corner, there are logos for Sint Maarten Trust Fund, the Government of Sint Maarten, and the World Bank Group. On the right side, a laptop is shown with a white screen displaying "Draft Stakeholder Engagement Plan", "November 2023", and the URL "http://www.nrpbsxm.org/swmp".

CONSULTATION

Project: Wastewater Management Project
Document: Stakeholder Engagement Plan
Date: November 2023
Status: Draft

We are requesting your feedback on our draft Stakeholder Engagement Plan. This plan is designed to ensure effective engagement between various stakeholders throughout the lifecycle of the Wastewater Management project.

▶ SEND US YOUR FEEDBACK!

Draft Stakeholder Engagement Plan
November 2023

<http://www.nrpbsxm.org/swmp>

Sint Maarten TRUST FUND
Government of Sint Maarten
WORLD BANK GROUP

Date Uploaded: 6th December, 2023

Link to NRPB Facebook page where this is uploaded:

https://www.facebook.com/story.php?story_fbid=pfbid02W5MtiMLPy4BXhMxQQgxaBgCGiWXcPkqYroaTWYUa2PM3wPaoCX3N4w83shFruQb2l&id=100064835345694&mibextid=Nif5oz&paipv=0&eav=AfYzy6l_RQGvcTkern7AMhw4aC0lVGuCpHb5oX2lBgaioxYufBZrhBYR-hvpHUYyzPc&_rd_