



EARTH DAY COMMEMORATION 2021

April 22nd, 2021

SEMINAR:

Environmental Impact Assessment and the Physical Planning and Development Approval Process SUMMARY OF KEY ISSUES AND RECOMMENDATIONS

Players Level 1, Grenada National Stadium

Hosted by:

Inter Agency Group of Development Organisations

in collaboration with

Friends of the Earth-Grenada

and

The Willie Redhead Foundation



EARTH DAY COMMEMORATION 2021

April 22nd, 2021

SEMINAR:

**Environmental Impact Assessment and
the Physical Planning and Development Approval Process**

SUMMARY OF KEY ISSUES AND RECOMMENDATIONS

Players Level 1, Grenada National Stadium

Hosted by:

Inter Agency Group of Development Organisations

in collaboration with

Friends of the Earth-Grenada

and

The Willie Redhead Foundation

LIST OF ACRONYMS

CANARI	-	Caribbean Natural Resources Institute
CDB	-	Caribbean Development Bank
EIA	-	Environmental Impact Assessment
ESIA	-	Environmental and Social Impact Assessment
FoE-G	-	Friends of the Earth-Grenada
GIDC	-	Grenada Investment Development Corporation
IAGDO	-	Inter Agency Group of Development Organisations
MEAs	-	Multi-lateral Environment Agreements
NEMS	-	National Environmental Management Strategy
NHAC	-	National Heritage Advisory Committee
OECS	-	Organisation of Eastern Caribbean States
PDA	-	Physical Development Authority
PPP	-	Public-Private Partnerships
PPU	-	Physical Planning Unit
SR&Os	-	Standing Regulations & Orders
tWRF	-	the Willie Redhead Foundation
USA	-	United States of America
wrf	-	with responsibility for

Earth Day Seminar: EIA and the Physical Planning and Development Approval Process
Grenada National Stadium, Players Level 1: 9.00 a.m. – 1.00 p.m.

SUMMARY OF KEY ISSUES AND RECOMMENDATIONS

1. Introduction

In commemoration of Earth Day 2021, the *Inter Agency Group of Development Organisations*, in collaboration with *Friends of the Earth-Grenada* and the *Willie Redhead Foundation*, hosted a seminar on the Environmental Impact Assessment Process and the Physical Planning and Development Approval Process re applications for land development. The seminar targeted civil society organisations - primarily non-governmental organisations and community based organisations. Given that COVID-19 protocols were being observed, the workshop was a hybrid activity with onsite participation restricted to 25 persons and persons participating via Zoom Link and also following via the website/Facebook page of *Friends of the Earth-Grenada* and other interested organisations. Based on attendance records, 22 persons attended in person while 23 persons participated via Zoom Link.

2. Background/Rationale

In 2020, members of the public put Grenada's land development approval process under the microscope. This keen interest was triggered by the road collapse at Moliniere¹ and the mega tourism development projects at La Sagesse², Levera and Mt. Hartman. Questions were asked about the conduct of the Environmental and Social Impact Assessment and the process by which planning approval was granted. The entity which conducted the EIA in respect of the La Sagesse project was in the public defending the integrity of the document it produced.

The Prime Minister of Grenada went on record stating that "*planning is a critical part of the country's development and it must be treated more seriously than it currently is*"³ and he "*underscored the importance of achieving greater compliance with planning policies, regulations and notices*". He was quoted as saying, "*We must act quickly to provide more enforcement power with respect to physical planning. It is not acceptable that a stop notice is given and the contractor and/or owner simply ignores this and continues building. That amounts to lawlessness; people cannot be ignoring the laws of the land.*"⁴ He advised of the imminent establishment of a Physical Planning and Development Authority.

¹ <https://www.thenewtodaygrenada.com/local-news/moliniere-land-slippage-area-a-sub-national-disaster-zone/>

² <https://www.nowgrenada.com/2020/03/resort-developers-deforest-mangrove-in-grenadas-third-most-diverse-birding-site/>

³ <https://www.nowgrenada.com/2020/09/government-to-take-swift-action-to-improve-physical-planning/>

⁴ Ibid

As Grenada rolls out its “climate plans”, to be funded by various international mechanisms and entities, citizens and civil society organisations are expected to participate in and contribute to consultations on various projects. Significant infrastructural development was announced in the 2021 Budget Presentation as a key element of the government’s strategy re recovery from the COVID-19 pandemic. Proper physical development plans, informed by rigorous Environmental and Social Impact Assessments, are a key element of a country’s Disaster Resilience Strategy. Individual citizens and the government must contribute to its implementation.

This was the context which informed the hosting of this seminar - *Environmental Impact Assessment Process and the Physical Planning and Development Approval Process in Grenada* - to mark Earth Day 2021.

3. Objectives:

The objective of the seminar was to enhance the participants’ awareness, knowledge and understanding of the following:-

- **EIA Process:** The Environmental Impact Assessment (EIA) Process – the role of an EIA; key steps and standards in the conduct of an EIA, required competencies etc.;
- **Public Participation:** Role of public involvement/participation in the EIA process;
- **Institutional Arrangements re EIA:** The institutional /administrative arrangements in Grenada in respect of the EIA process;
- **Physical Planning Unit/Authority and Approval Process:** Steps in the Physical Planning and Development Approval Process in Grenada and the role of the EIA report /statement in the approval process;
- **Legislation:** The legislation governing the Physical Planning and Development Approval Process

There were four presentations followed by an interactive, question and answer session with the audience and the presenters. The presenters and presentations were:-

- Ms. Joyce Peters-Thomas, Independent Consultant: *The EIA Process*
- Mr. Brian Samuel, Independent Consultant: *The Role of an EIA and the Technical Competencies required in the Conduct of an EIA*
- Ms. Aria St. Louis, Director of Environment, Environment Division/Member of the Planning and Development Authority: *The Environment Division: its Role in the EIA Process and Current Initiatives of the Division.*
- Mr. Christopher Joseph⁵, Climate Change Officer wrf for Mitigation, Environment Division/Member of the EIA Review Committee: *Legislative Framework and Institutional Arrangements.*

⁵ Mr. Joseph presented the *Physical Development and Control Act 2016* and the *Draft Regulations 2015* (with the permission of the PPU) to the seminar.

Hereunder are the key concerns, issues and recommendations which emerged during the seminar. Participants requested that these be shared with stakeholders responsible for making decisions re the granting of approval for land development.

4. Summary of Key Issues and Recommendations

4.1. Enabling the Environment Division

- **Absence/Weak Legislation re Environmental Protection:** The Environment Division does not have the legislative mandate to enable it to function as an environmental protection agency. Its Cabinet-approved mandate is the co-ordination of the multi-lateral environmental agreements (MEAs).
 - **National Environmental Management Strategy/Plan:** Grenada has its National Environmental Management Strategy and Plan. These connect the actions of all agencies which play a role in environmental protection and management. **However, all the parts of the legislation of Grenada relevant to environment were weak.**
 - **2008 Draft Environmental Management Legislation:** The proposed draft Environmental Management Act which will position the Environment Division to be an environmental protection agency has been in draft since 2008. It was reviewed, updated, and re-submitted to Cabinet in 2018. It remains in draft.
 - **OECS Environmental Management Act:** The OECS has an Environmental Management Act which is not mandatory legislation for Grenada but is a “moral obligation”.
- **Status of Legislation:** The Environment Division is waiting on the passage of pertinent legislation to enable it to play a role as an environment protection agency. Without the legislation, it is unable to do what it should be doing/wants to do. In the meantime, it uses the *OECS Management Act*, the *NEMS* and other key policy documents as moral obligations and best practices.
- **Human Resource Capacity:** There is a low level of human resource capacity in the Environment Division given the inadequate staffing re staff with technical competencies, and the loss of technical staff in related government divisions as officers retire.

4.1.1. Recommendations

- **Legislation:** As a matter of urgency, the required legislation and regulations should be passed to provide the Environment Division with the required “legislative teeth” to be an environmental protection agency.
- **Human Resource Capacity and Competence:** The human resource capacity in the Environment Division and related divisions should be strengthened – by hiring additional long term staff and succession planning in preparation for the retirement of senior officers.

4.2. Environmental and Social Impact Assessment

4.2.1. Purpose

The purpose of an Environmental and Social Impact Assessment is to:-

- **Assess Impact on the Environment/Stakeholders:** The purpose of an ESIA is to make sure that the project will do more good than harm. Would the project harm or contribute positively to the environment and/or the stakeholders?

- **Foot Print of Project:** It assesses the footprint of the project; an ESIA would clearly identify, understand impacts of proposed project on the environment/stakeholders and identify the required mitigation actions to prevent/minimize the adverse impacts.
- **Tool for Decision-Making:** An ESIA Report is a tool to aid informed and responsible decision-making. It:-
 - Equips business leaders to make informed and legally responsible investments;
 - Assist regulators and competent authorities to make informed decisions to approve or deny a proposed development;

4.2.2. The ESIA Process

- An ESIA is a process. The steps in the ESIA Process are: - *Screening, Scoping, Impact Assessment; Reviewing; Licensing; Environmental Management Plan; Monitoring.* The process is more important than the Report which is the output of the process.
- **At the Beginning of Project Preparation:** The ESIA is very important and should be done very early in the process, before project design is completed, in order to inform completion of project design. Changes cost money and may deter the developer from continuing. An ESIA should be done before any sod is turned, before the project begins or before a financing commitment is made.

4.2.3. Terms of Reference of the ESIA

- **Terms of Reference:** At the Scoping step, the Terms of Reference for the ESIA is prepared. The scoping step of the ESIA will determine the important issues to be considered during the EIA; establishes the boundaries of the project area; identifies what will be included in the EIA; how the EIA will be done.
- **Responsibility for Preparation of the Terms of Reference:** It is unclear as which entity or position has responsibility for preparing the Terms of Reference for an ESIA to be undertaken in Grenada.
- **Legislative Framework:** Does Grenada's legislation provide guidance on the Terms of Reference?
- **Human Resource Constraints:** Given that the development of the Terms of Reference for the ESIA is not the day to day function of the government agencies, should/could the development of the Terms of Reference be a short term assignment to consultants who would prepare the draft that would be reviewed and finalized by government officers?

4.2.4. Impact Assessment and Mitigation

- This third step is the core of the ESIA process, the detailed evaluation of the environmental and social impacts of the proposed project.
- **Baseline Conditions:** The impact assessment looks at baseline conditions. It is very important to establish baseline conditions since this information identifies what exists and could be lost as a result of the project.
- **Alternatives:** It also includes the identification of alternatives.

- **Mitigation Measures:** The impact assessment would also identify/recommend the mitigation measures to be put in place. The costs of the mitigation measure(s) to be put in place in order for the project to be sustainable could deter a developer/investor.
- **Who Conducts an ESIA:** The Impact Assessment should be conducted by a multi-disciplinary team of experts who have the qualifications and skills to assess the diverse environmental and social impacts. **Impact Assessment cannot be done by an individual.**

4.2.5. Impact Management/Environmental Management Plan

Impact management requires the creation of an environmental management plan. The plan is created to manage and monitor the mitigation measures. It is done after the impact assessment has identified the impacts, the risks and the mitigation measures to address the risks and negative impacts.

4.2.6. Review of the ESIA Report

- The ESIA Report is the compilation of the important components of the project including a project description and the results of the impact assessments. It should also contain the Environment Management Plan and the Monitoring Plan.
- **Review of the ESIA Report:** The review of the report confirms the quality of information and the methods used in conducting the assessment.
 - **Standards:** Various countries and entities have different standards; some just tick that there is an ESIA Report while others are serious about reviewing the ESIA report.
 - **Who Reviews the Report:** It is important to have persons of competence reviewing the report. They must be at least equal in competence to those who prepared the report.

4.2.7. Monitoring

Monitoring ensures the fulfillment of commitments made in the approved ESIA. **The implementation of the mitigation measures contained in the Environmental Management Plan has to be monitored.**

- **Monitoring the EMP in Grenada:** In Grenada, who/what is responsible for monitoring the implementation of the EMP? Monitoring does not necessarily have to be done by government. Government has the authority to ask competent institutions to do the monitoring or monitoring can be done by the developer /investor under the supervision of independent agencies and/or government agencies.
- **Changes to Project Design:** Depending on the mitigation measures, a change may be required in respect of the design of the project. Are the changes being executed?

4.2.8. New Approaches to ESIA

- A new framework for the ESIA has been prepared by a group representing multi-lateral organisations, financial organisations, regional and international organisations. Among the organisations using the new framework are the UN agencies, the World Bank and the Caribbean Development Bank.
- **Stakeholder Involvement:** An important component of the new framework is stakeholder engagement. **International agencies have recognized the importance of stakeholder**

involvement and stakeholder consultation very early in the process, **prior to project design.**

- **Stakeholder Engagement Plan:** Thus, projects are required to submit a stakeholder engagement plan. When an invitation to bid is put out for the design of a project, there is also an invitation to present a plan for the conduct of stakeholder consultations.
- **Social and Environmental Standards /Safeguards:** A part of the new framework is the Social and Environmental Standards/Safeguards. **These identify up front what are the areas to be covered during the conduct of an ESIA.** Even if the government has not adopted these guidelines, the guidelines will apply to any project funded by CDB or the World Bank.
- **New Framework and Sources of Financing:** It is unclear what happens in Grenada if projects are undertaken by private investors or projects are funded via the Consolidated Fund. Is/will the new framework be applied?

4.2.9. Recommendations

- **Development of the Terms of Reference:** Guidance on the development of the Terms of Reference should be in legislation. The legislation should specify what entity/entities are responsible for the development of the Terms of Reference; what sectors should be considered and the requirement for public involvement throughout the process.
 - **ToRs for Change of Use of Natural Areas⁶:** The Terms of Reference procedure with regard to conducting an ESIA for a natural area is far more complex than the ToRs for a large building construction site. There are many more issues to address. The ToRs re change-of-use for the natural area - which maybe a sensitive ecosystem and critical habitat for wildlife - must provide adequate details and guidelines specifying how the natural area should/should not be impacted. If this guidance is lacking and compliance is not monitored, then there is a high risk of destruction of the natural site as exemplified by the situation at the La Sagesse, Levera and Mt. Hartman sites⁷.
- **Role of Environment Division:** The Environment Division should play a role throughout the EIA process, from the Scoping Stage, Its role should be legislated and this should include development and approval of the Terms of Reference.
- **Roster of Approved Consultants re Development of Terms of Reference:** Acknowledging the constraints of time and personnel within various government ministries/agencies, a Roster of Approved Consultants should be developed re persons who could be recruited on short term assignment to support the development of the Terms of Reference for the ESIA.
- **Consultants Conducting the ESIA:** The ESIA must be conducted by a multi-disciplinary team of persons approved by the Environment Division or the OECS Development Unit to conduct the EIA.

⁶ Post seminar, the ToR recommendation was further elaborated by insertion of this detail..

⁷ <https://www.birdscaribbean.org/2020/08/birdscaribbean-expresses-deep-concern-over-three-damaging-developments-in-grenada/>

- **Public Participation:** The community and broader public must engaged during the assessment of the baseline conditions. The ESIA team will benefit the local knowledge of community persons.
- **Access to Environmental Management Plan:** The Environmental Report and Environment Management Plan must be accessible for public scrutiny and comment.
- **Documentation and Standards re the EIA Process:** The ESIA process in Grenada should be clearly documented and aligned with the Environmental and Social Safeguards now being applied by regional and international organisations such as the Caribbean Development Bank and the World Bank, both being significant funders of public sector projects in Grenada. This information must also be available to the public.

4.3. Legislative Framework and Institutional Arrangements re EIA

- The *Planning and Development Control Act, No. 23 of 2016* is the legislative framework providing for the conduct of the EIA.
- **Competent Authority:** Section 5(1) of the Act provides for a Planning and Development Control Authority.
 - **Who is the Authority?** It is unclear who is the authority. Is the Board, as currently constituted, the Authority?
 - **Status:** Grenada has not yet completed the transition contemplated by the PDCA, No.23 of 2016.

4.3.1. Environmental Impact Assessment

- **Section 22:** Section 22 of the *Physical and Development Control Authority Act 23 of 2016* is the legislative framework governing the conduct of an EIA.
- **Section 22(1), EIA Required:** According to Section 22(1), “*The Authority may require an Environmental Impact Assessment to be carried out in respect of any application for permission to develop land, including an application for approval in principle, if the proposed development could significantly affect the environment*”.
- **Section 22(4), Power of Minister to Make Regulations:** Section 22(4) provides for the Minister to make regulations under the Act so that an EIA is required; define the scope of the EIA: decide the minimum contents of the report of an EIA, procedures for public participation etc.
- **Schedule III:** Schedule III of the Act identifies the projects/developments for which an EIA is mandatory.

4.3.2. Concerns/Gaps/Required Clarifications re the PDCA, No. 23 of 2016

The following were noted in respect of Act No. 23 of 2016:-

- **Regulations:** The regulations which will provide for the implementation and enforcement of the Act had not been passed though drafted and available since 2015.
- **Deficient Legislation:** The legislation was **deficient in prescribing what is required for an EIA process in Grenada**. It lacked specifics/ details.
- **Broad Discretion:** Section 22 gives a “broad measure of discretion” to the Authority:-
 - **Section 22 (1):** The Authority may require an EIA to be done.

- **Section 22(2):** The Authority, in its discretion, may decide that an EIA should not be carried out.
- **Discretion of the Minister, Section 22(4):** The law allows the Minister too much discretion. Had the Minister made any regulations that will make the process more rigorous? Can the Minister overturn the recommendations of a competent authority or of an advisory committee responsible for advising the authority, e.g. the EIA Review Committee or the National Heritage Advisory Committee?
- **Checks and Balances: Section 22(6)** makes provisions for the Authority to influence other government agencies. These provisions have “checks and balances” potential. However, “the devil is in the detail”. Do these checks and balances work? How do they work?
- **Interpretation, Section 22(7)⁸:** To whom does Section 22(7) make reference? Can members of the Authority and/or the Minister be fined or jailed for any contraventions of the legislation or regulations?
- **Outline Planning Approval:** How could “outline planning approval” be given prior to all the studies, including an EIA, being done? How could a response to some applications be given within a certain number of days when the studies needed to make a proper assessment were not undertaken?
- **Exemptions:** Does Government have the authority to exempt a particular project/entity from an EIA process?
- **Roads:** Construction of Roads is not listed in *Schedule III* as one of the projects requiring an EIA. Roads should require an EIA, particularly in the context of climate change. Changes are made which significantly impact the physical environment. e.g. increase the speed of flow of water.

4.3.3. Physical Planning & Development Control Regulations (2015) Draft

- **SR&Os:** The Regulations are Statutory Regulations & Orders. They have to be brought to Parliament by the responsible Minister.
- **Not Submitted with Primary Legislation in 2016:** These regulations, which would provide clarity in respect of the Act and were ready and available in 2015, were not submitted and approved along with the primary legislation which was passed in 2016. **The regulations remain in draft.**
- **Lacking Clarity/How Were Things to Be Done:** The Draft Regulations also lacked clarity and detail on how things were to be done. What were the institutional arrangements and mechanisms.
- **Selective Implementation:** There appears to be a “picking and choosing” of certain aspects of the regulations which are implemented. E.g. The EIA Committee mirrors what is in the draft regulations.
- **EIA Committee/The Head:** *Section 41 re Membership of the EIA Committee* makes reference to “the Head” as a member of the EIA Committee which is appointed by the Minister. **To whom does “the Head” refer?** Does “the Head” refer to the Head of the Physical Planning Unit?

⁸ Act 23 of 2016, Sect. 22(7): ‘Any person who contravenes subsection (1) or contravenes the provisions of any regulations made under subsection (4) commits an offence, and is liable, on summary conviction, to a fine of twenty thousand dollars or three years imprisonment or to both’.

4.3.4. Recommendations

- **Passage of Regulations:** The Draft Regulations must be legislated in order to give “teeth” to the implementation of the PDCA 23 of 2016.
- **Discretion of the Minister:** The discretion of the Minister should be reduced.
- **Need for Clarifications:** The “grey” areas in the legislation and regulations need to be clarified and corrected.
- **Documentation re Institutional Arrangements:** The legislation and regulations need to be complemented by detailed documentation of the institutional arrangements for transparency, accountability and responsiveness. It must clarify the role of the various stakeholders/agencies and the processes and procedures for taking action and implementing decisions.

4.4. Treating with Recommendations of the EIA Review Committee

- **Recommendations and the PDCA Board:** It is unclear how well the recommendations of the EIA Review Committee return and reach the Board which is responsible for final decision-making process.
- **Recommendations Form Part of the Approval Process:** Even when the Board agrees on the recommendations that should be stipulated and included as part of the approval process, “the devil has been in the detail and follow-up”.
- **Institutional Arrangements:** There was a lack of clarity in respect of the following:-
 - **Approval by the Authority:** After the EIA is done and reviewed, how is the permission given by the Authority, what are the details in respect of permission? E.g. in respect of the Range Project in La Sagesse, were specific instructions issued?
 - **Monitoring:** Who checks whether or not there is compliance with the recommendations?
 - **Next Steps:** What happens next after this person/entity checks on the compliance with respect to the recommendations ?
 - **Stop Notices:** What happens if stop notices need to be issued? Who issues stop notices?
 - **Non-Compliance:** What happens if there is non-compliance?
 - **Court Action by the Non Compliant:** What happens when someone/some entity who is stopped for non-compliance decides to go to court?
 - **Who Represents the Recommendations of the EIA Committee in Court:** When the matter reaches court and the issue of the recommendations arise, who represents the recommendations arising from the EIA Review Committee or the recommendations stipulated by the Board?
 - **Evidence from Physical Planning Officers:** It is understood that evidence in respect of compliance with the recommendations is given by the Physical Planning Officers. Evidence is not given by officers from the Environment Division who sit on the EIA Review Committee and are the ones making the recommendations.
 - **Stop Notices:** The Environment Division was particularly concerned that the application of stop notices should be consistent across the board. **Were the stop notices being applied in the same manner to everyone and every entity?**

- **Decision-making in the PDCA Board:** The PDCA functions like Cabinet, making decisions by voting. The majority decision carries.

4.4.1. Recommendations

- **Legal Provisions re Feedback & Monitoring Mechanisms:** While recommendations are made by the EIA Review Committee, a mechanism does not exist for follow-up and feedback re treatment of the recommendations and monitoring. There should be legal provisions to close this gap.
- **Role of Environment Division:** There should also be legal provisions which formalize and strengthen the role of the Environment Division in respect of the ESIA process.
- **Institutional Arrangements:** The legal provisions should be complemented by well documented and clear institutional arrangements - the responsibilities and relationships between the various stakeholders, actions to be taken by the various stakeholders and the procedures to be followed for taking such action. This document must provide clarity, transparency and address issues of accountability and governance in respect of the process. **It must be made available to all stakeholders including the general public.**
- **Human Resource Capacity, PPU:** The technical capacity of the Physical Planning Unit needs to be upgraded through additional staffing and competencies.
- **Documentation of ESIA Process:** Documentation of the entire ESIA process is recommended so that the affected communities/public at large would be able to understand and follow the ESIA process.
- **PDA Decision-making Process:** Is the decision-making process of the PDA, decision by majority vote, the best method of decision-making with regard to the nature of the matters under consideration? Are there alternative processes that may be more appropriate?

4.5. Public Participation/Right to Know

- **Consultation:** There are provisions for public consultation in the legislation but this provision is not supported by regulations given that the regulations have not been legislated.
 - **Act 23 of 2016, Section 22(4)(e):** The Minister may make regulations under this section providing for “*the procedures for public participation in the Environmental Impact Assessment process, and public scrutiny of any report on an Environmental Impact Assessment submitted to the Authority*”.
 - **Draft Regulations 2015, Section 47:** Section 47 of the Draft Regulations specifies what is considered Public Participation.
- **Right to Information:** The public’s right to know/right to access information is not included in the legislation. **Mechanisms do not exist to facilitate access to information by the public.**
 - **Register:** What exists currently is a register in the Physical Planning Unit which the public can access. This register lists certain information on the project.
 - **Escarzu Agreement:** Grenada is a party to the Escarzu Agreement which provides for the public’s right to information and participation re issues pertaining to the environment.

4.5.1. Recommendations

- **Legal Provisions for Public Participation/Right to Know:** The legislation and regulations re PDCA No. 23 of 2016 and its regulations must have explicit provisions for public participation and the right to know during the entire EIA process.
- **Access to Information:** Grenada must fulfill its obligations under the *Escazu Agreement*. There must be legislation, regulations and mechanisms which facilitate the public's access to information.

4.6. Governance, Environment and Development

- **Livelihoods and Sustainability:** The priority of regional governments including Grenada appears to be development and once the project has the "numbers" attached to it in respect of finance etc. the project is approved without regard for the conduct of an ESIA or in total disregard of the ESIA. These mega projects being promoted by the Government of Grenada, must be evaluated on sustainability criteria, their contribution to sustainable community livelihoods and impact re enhancing the quality of life of the affected communities.
- **Political Will:** Protection of the environment is a matter of political will and how the government values the environment. Citizens have to hold their governments accountable for the protection of the environment.

4.6.1. Recommendations

- **Land Development Policy and Control:** Grenada is a small island and must preserve its lands. There must be land zoning. Specific areas need to be set aside for certain types of development. This is the key to avoiding community-developer conflict. Urbanism has a role to play.
 - Sound environmental planning also reflects good governance.
- **Protection of Mangroves:** Given the role of mangroves in coastal protection, mangroves should be protected, be they situated on privately or publicly owned property. In some jurisdictions, it is illegal to destroy red mangroves.
 - **Co-management:** A mechanism to facilitate co-management could be established so that both the private land owner and the state could enjoy the benefits that mangroves bring/could bring benefits to both owners and the country at large.

4.7. The Future We Want:

- **Development for Whom:** For whom is/was development being promoted/undertaken?
- **Vision of the Future:** What is our vision, as citizens, for areas such as Levera? Will we the citizens leave all decision-making in respect of our natural resources to the politicians? Will Grenada just allow developers with money to come in and do what they want? There is a need to come up with better projects than those mega projects that the government has been promoting in key sensitive ecosystems and places of natural, cultural and heritage significance to Grenadians.
- **Role of Citizens:** Citizens need to take the leadership role in how they want to see development happen. Citizens need to be proactive in demanding better projects. They can lobby government, their Members of Parliament and they can also be proactive and seek meetings with developers. They must prepare to participate and to hold their government and representatives accountable.

CONTACT INFORMATION

The Inter Agency Group of Development Organisations

c/o Agency for Rural Transformation

P.O. Box 750, St. George's

E-mail: iagdognd2013@gmail.com

Website: <https://iagdo.org/>

Chairperson: Sandra C.A. Ferguson

Friends of the Earth-Grenada

Tel: +14734161247

E-mail: foteg2021@gmail.com

Website: <https://www.facebook.com/FOTEG-2021-Friends-Of-The-Earth-Grenada>

President: Joseph Antoine

The Willie Redhead Foundation

P.O. Box 17, L'Anse Aux Epines,

E-mail: willieredheadfoundation@spiceisle.com

twrfoundation14@gmail.com

Website: <http://www.willieredheadfoundation.org>

President: Samuel "Tim" Byam