

**FINAL**



**Regional Political Economy,  
Gap Analysis & Priority  
Selection  
REGIONAL SESA  
OECS CROP**

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# FINAL Regional Political Economy, Gap Analysis and Priority Selection: REGIONAL SESA FOR OECS CROP

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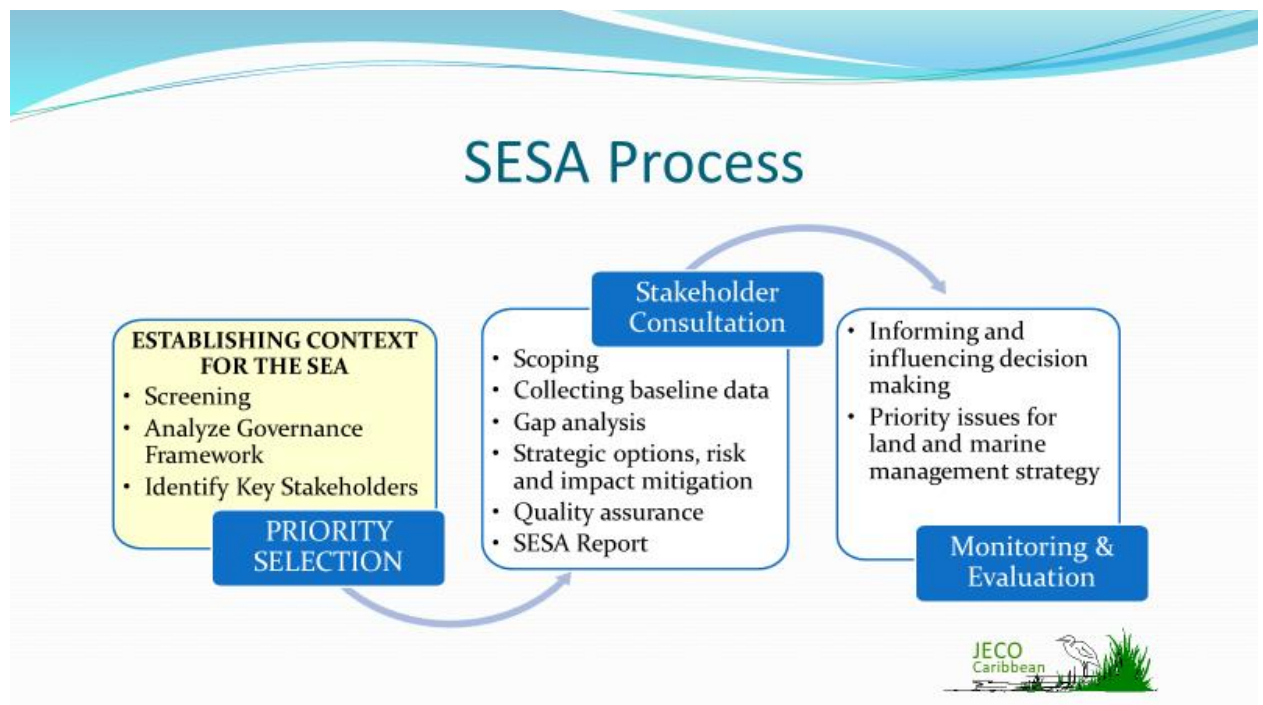
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## 1.0 Context

### 1.1 Strategic Environment and Social Assessment (SESA)



This report presents Task 3 of the Consultancy as an addendum to the Situation and Stakeholder Analysis for the Strategic Environment and Social Assessment (SESA). The recommendations and areas for action are based on policy responses to present socio-economic drivers and environmental pressures. Several studies, including the CROP Feasibility Report, have concluded that the principal reason for degradation of Caribbean marine resources is weak or poor governance.

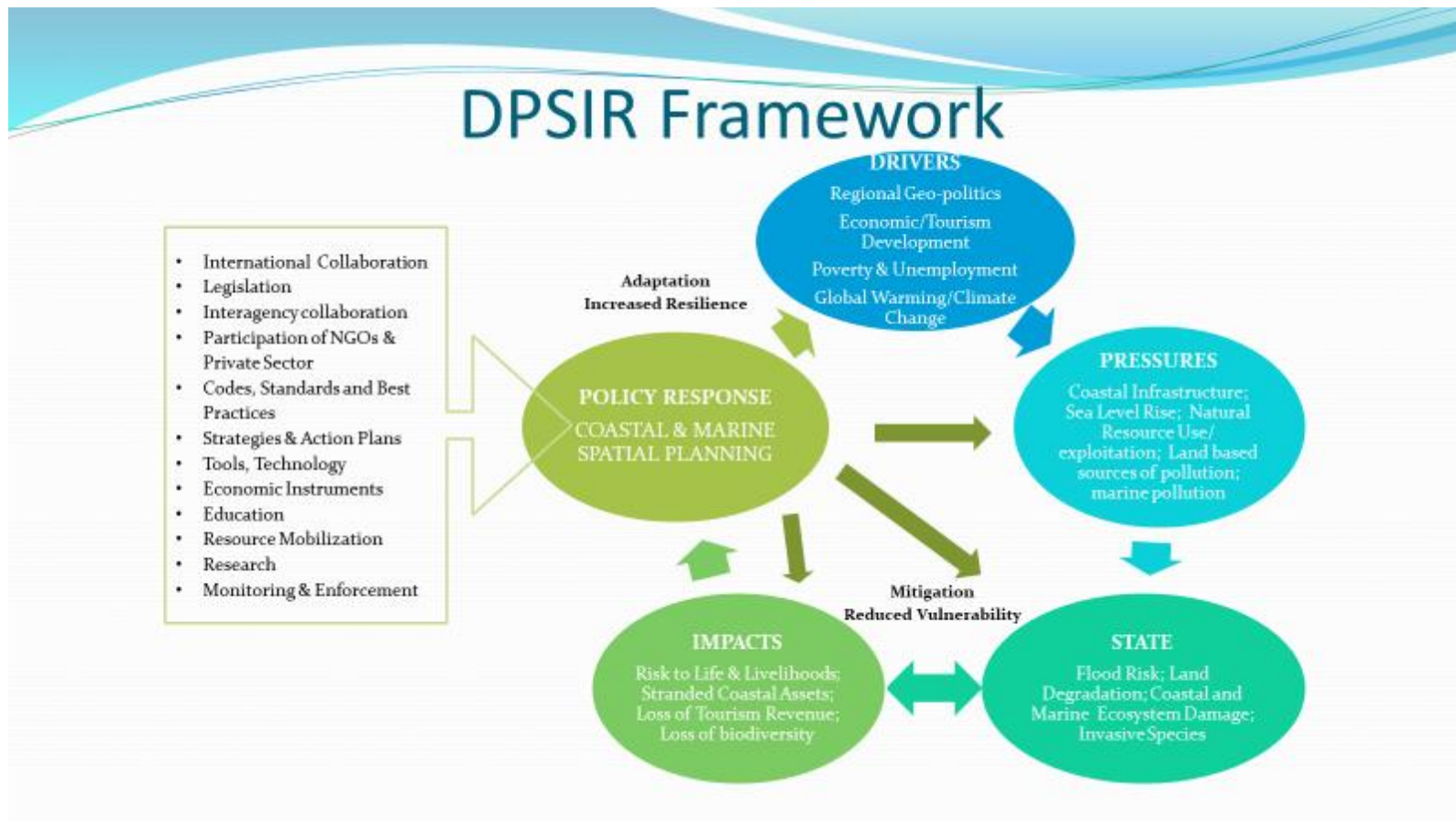
To conduct the situation and stakeholder analysis a framework for good governance emerged from the literature review, concerns of stakeholders and the consultant's expert judgment. The policy responses can therefore be summed up as the governance framework for coastal and marine resources management. [Note that it is a requirement of the terms of reference for this consultancy to provide an analysis of the governance framework for coastal and marine spatial planning (CSMP) in OECS States.]

The outcomes of this task provide the input for the second phase of the SESA process.

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### 1.2 Drivers, Pressures, State, Impact and Responses

The drivers, pressures, state, impact and response (DPSIR) framework was utilized to scope the present situation in member states. This is summarized in Figure 1. This represents analysis of over 150 documents and stakeholder input which is presented in the full report and annexes to same.



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### 1.3 Governance Framework

The three main components or dimensions of good governance were applied in the Situation and Stakeholder Analysis:

- **Component 1: Policy, Legal, Institutional and regulatory frameworks.** This considers the long-term systems of policies, laws, rules and regulations for management of coastal and marine resources within the various sectors that impinge upon the coastal zone. An analysis of this component of good governance must address the clarity and coherence of these frameworks and how they interact to define the overall context for use, management and decision-making with regards resources in the coastal zone.
- **Component 2: Planning and Decision-making processes:** is concerned with the degree of transparency, accountability and inclusiveness of key natural resources management process and institutions. This component of good governance explores the characteristics of these process and institutions, the operation of key agencies, the space they create for the participation of stakeholders, the accountability of power holders and decision makers.
- **Component 3: Implementation, enforcement and compliance.** This component of good governance examines the extent to which the policy, legal, institutional and regulatory frameworks are implemented. It further considers the level of effectiveness, efficiency and equitability of implementation.

These three components are mutually exclusive yet re-enforcing of each other so that failure across one component will affect effective governance, maintaining environmental quality and sustainable development. They are underpinned by the principles of accountability, effectiveness, efficiency, fairness/equity, participation and transparency.

# Governance Framework

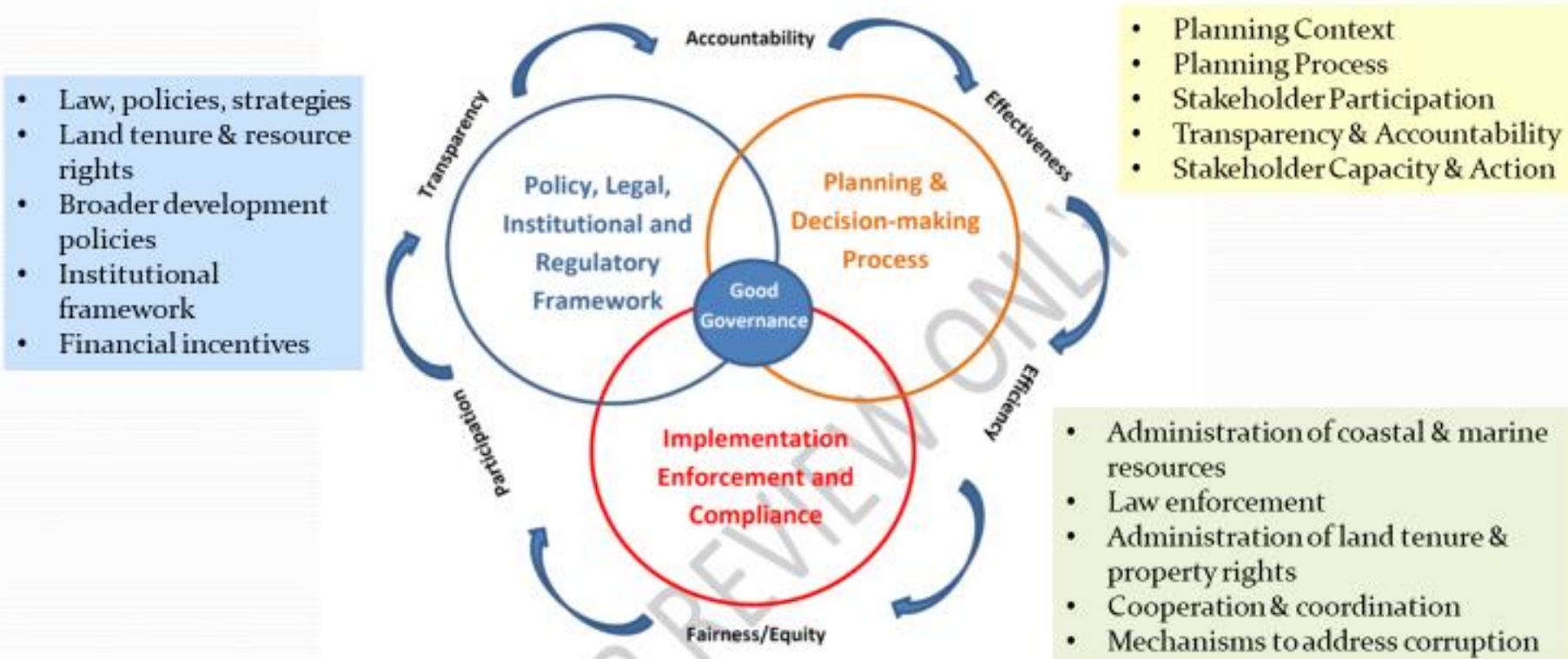


Figure 2.1 Components and Principles for Good Governance (compiled by author)

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## **2.0 REGIONAL GAP ANALYSIS**

### **2.1 Political Economy Constraints**

#### **2.1.1 Independent Small Island States**

- Regional treaties and agreements have no direct effect at the national level and must first be adopted into domestic legislation and policies to enter into force.
- Spatial management of coastal and marine resources also requires that the geographic boundaries or limits of territories be defined. The OECS MS have made significant progress in recent times towards formalization of their maritime boundaries and exclusive economic zones (EEZ).
- All the territories within the marine space do not belong to the OECS Union which introduces another layer of complexity for negotiating transboundary matters. Dominica for instance shares its EEZ boundaries with Martinique and Guadeloupe which are both French overseas territories. On issues related to fisheries and ocean governance directives of the European Union take effect.
- The disparity in political and economic status thus means that small states are often disadvantaged in negotiations on trade.
- Competition among territories for trade, tourism arrivals and private sector investment opportunities. Each OECS Member State has some form of citizen by investment (CBI) program.
- OECS States are required to meet standards which when compared to larger states do not have the human, technical and financial resources to enable their compliance.

However, there is progress towards improving transboundary management of the common marine space as Martinique has achieved observer status within the OECS Union and Guadeloupe has indicated interest to follow. Other territorial interest in the eastern Caribbean region include the USA, Britain, the Netherlands, Trinidad and Tobago, Barbados and Venezuela. OECS States have common economic and social partnership with Barbados, Trinidad and Tobago through their membership in CARICOM, ACS and OAS.

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### 2.1.2 Governance arrangements

#### 2.1.2.1 *Legal and Regulatory Framework*

Singh (2008) conducted a comprehensive review of the legal and regulatory framework for governance in the Caribbean Sea at the international and regional level. The review provides a thorough treatment of international conventions and laws, multilateral environmental agreements, UN general agreements, regional treaties and agreements and “soft laws”, resolutions and diplomatic agreements.

Singh’s review addresses only component 1 of the framework presented in Figure 1.4 and no attempt was made to perform an assessment of the institutional aspects of the framework. DR Singh provided details on the provisions of the various conventions across three themes, pollution, sustainable management of living resources and sustainable management of non-living resources.

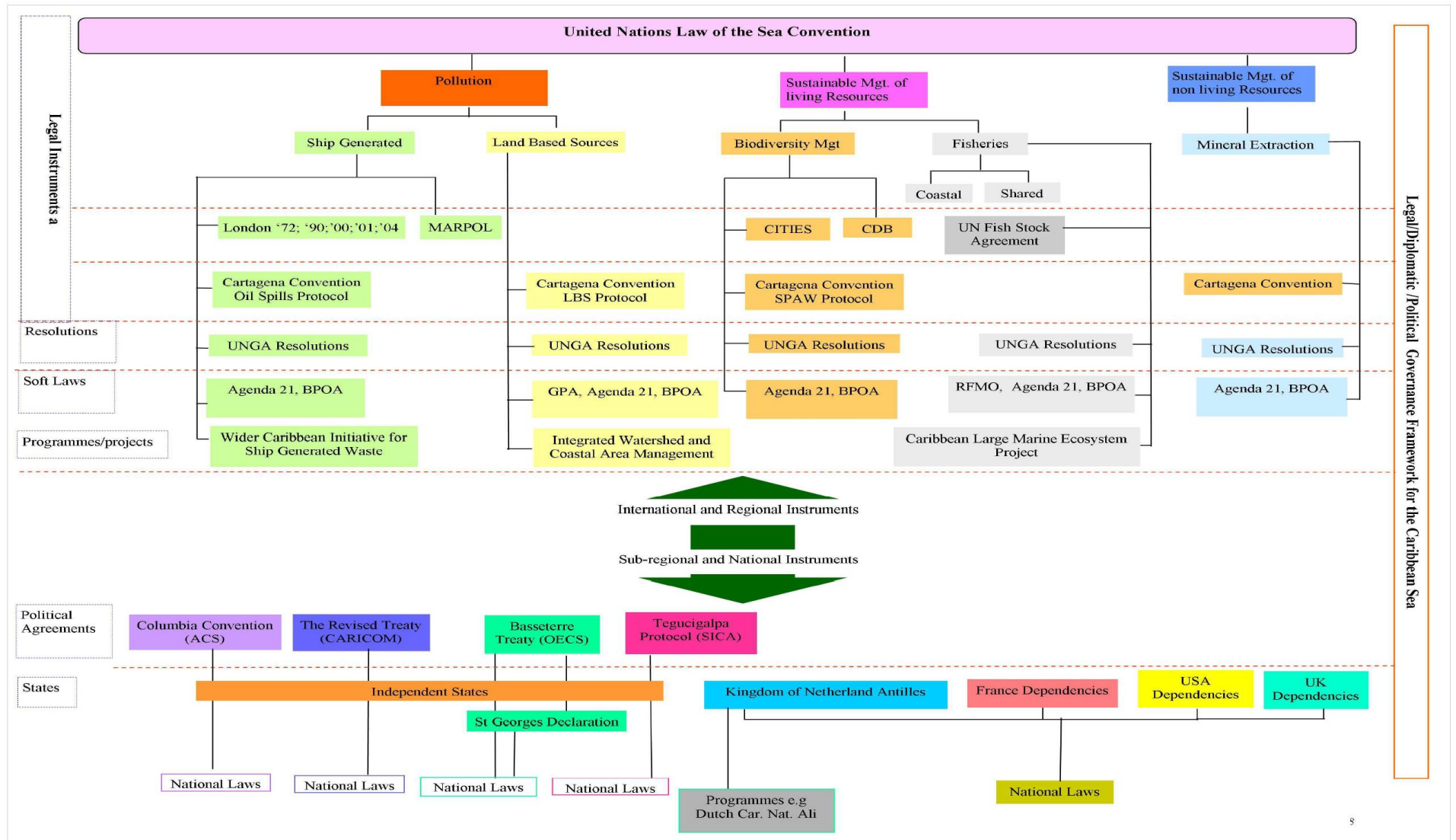
From the review it can be concluded that there is a robust regulatory framework for Caribbean ocean’s governance at the international level (See Figure 5.1 and Annex VII of the Situational and Stakeholder Analysis Report).

A work plan was formulated by the Association of Caribbean States (ACS) and UNECLAC to track progress in implementation of the obligations under the various resolutions and agreements. Following from the work of the ACS, Singh concludes that “large cohort of responses have been undertaken by States and it shows that actions are being taken in the region.

For example, projects were undertaken to address integrated coastal zone management, upgrading contingency plans for port States, addressing oil pollution and information and training for oil spill response among others”.

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Figure 2.1 Conventions, MEAs, Policies and Programs of Action for Management of the Caribbean Sea (Singh, 2008)



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DR Singh notes however that:

- there is a lack of clarity or coherence in some of the conventions and in many cases repetition of provisions;
- States have been slow in ratifying agreements after signing and even slower in effecting implementation at the national level. It is noted that independent States are quicker to ratify agreements than dependent territories who are lagging;

There is need for a common legal framework for Caribbean oceans governance, to rationalize the various MEAs and develop coordinating mechanisms for their implementation.

### *2.1.2.2 Eastern Caribbean Regional Ocean Policy (ECROP)*

In direct response to the above governance constraints, in 2013 the Heads of Government of the OECS adopted the ECROP making it the first transboundary ocean policy agreement in the region. The ECROP includes a Strategic Action Plan and provides the framework for enhanced coordination and management of ocean resources among and within the OECS Member States. As part of the Action Plan, the OECS Member States with the support of the OECS Commission committed to:

- a) the development of a marine research strategy that identifies key information & knowledge requirements for decision making;
- b) promoting the adoption of ecosystem-based management by its Member States; and;
- c) the establishment of a network of marine protected areas.

### *2.1.2.3 Planning and Decision-Making Process*

Regional planning is sectoral and there is no lead regional environmental management or protection agency to coordinate planning across sectors and organizations. With few exceptions, planning results in policy and strategy formulation with limited direct implementation of results-oriented pilot projects. There is need for greater involvement in stakeholder participation in development planning and decision-making process. OECS States have yet to fully implement policies and legal framework for public participation. They have recently agreed to/signed the “Regional Agreement on Access to Information, Participation and Justice in Environmental

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Matters”. However, there is no clear regional mechanism for implementation of this agreement which must first be adopted into domestic legislation to take effect.

### *2.1.2.4 Implementation, Monitoring and Compliance*

Implementation of regional policies, programs of action and or projects takes place at the national level. This is often delivered in collaboration with public sector ministries or through direct contracting with private sector consultants, non-governmental and community-based organizations. Regional organisations therefore tend to operate in a project management mode coordinating delivery of outcomes to national stakeholders.

The framework for regional corporation for fisheries is provided for in the various Fisheries Regulations of the individual Member States. The project document for the CLME+ provides a thorough situation and baseline analysis on the regional mechanisms for CSMP in the Caribbean (2015). A regional Transboundary Diagnostic Analysis (TDA) was also undertaken for Caribbean Large Marine Ecosystems in 2011. These reports present details on the nature of the regional mechanisms, mainly advisory, which are important for marine resources management especially fisheries.

In addition to OECS and CARICOM, the regional arrangements which support efforts at the national level through collaboration on training, research, monitoring and other areas of technical cooperation include:

- UNEP Caribbean Environment Programme (UNEP CEP)
- Western Central Atlantic Fisheries Commission (FAO-WECAFC)
- Caribbean Community Common Fisheries Policy (CARICOM-CCCFP) and CARICOM Regional Fisheries Mechanism (CRFM)
- OSPESCA Regional Fisheries & Aquaculture Policy
- CRFM-OSPESCA Memorandum of Understanding (MoU) and Joint Action Plan
- Regional Environmental Framework Strategy for Central America (ERAM-CCAD)
- European Marine Strategy Framework Directive (MSFD)
- European Water Framework Directive (WFD)
- USA Ocean Policy and Implementation Plan
- NOAA Caribbean Strategy

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### 2.4 Priorities for action at the Regional Level

Several priorities requiring action at the regional level were among the key findings of the situation and stakeholder analysis and the recommendations from the CROP feasibility study. They include:

#### 2.4.1 Immediate to Short Term Actions (2018-2020)

- A regional Stakeholder Advisory Committee should be created to provide guidance and recommendations to ensure full stakeholder participation in MSP processes;
- For a regional MSP to be effective, the World Bank and the OECS Commission must solicit the buy-in and participation from as many countries sharing the island chain as possible.
- Regional agencies and projects should be engaged to help encourage participation from non-CROP countries.
- The regional Ocean Governance Team should play a key role in guiding the work of the national and regional MSP to ensure that decisions are aligned with international best practice.
- A regional data base of persons qualified in MSP relevant fields should be created to allow for exchange and utilization of national and regional technical experts in the planning and implementation of MSP.
- The key activities that should be completed prior to the final approval by the GEF and project kick-off include concluding boundary delimitation discussions with neighboring countries, soliciting buy-in and participation from other countries that are not part of the CROP, and mobilizing additional financial resources.
- A regional Legal Advisory Task Force with representation by the Attorney General from each OECS country should be created very early in the process to provide legal guidance for the MSP.

#### 2.4.2 Medium to Long Term Actions (2020-2022)

- Collaboration mechanisms with potential regional partners should be promoted as there are several ways that they can support CROP implementation including mobilizing finances, providing training, undertaking project work, supporting stakeholder participation, and guiding the development of the required legislative and operational framework.

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- Establish a regional environmental protection agency to provide support for national agencies in areas such as monitoring, baseline ecosystems surveys and assessments, research, environmental information management systems and data management;
- Establish a regional environmental commission, tribunal or court at the CCJ to address matters related to management of the Caribbean Sea, territorial boundaries and EEZ, compliance with regional environmental standards and laws;
- Develop regional oversight mechanism for public authorities with responsibility for environment, coastal and marine resources management;
- Develop regional oversight mechanism for transparency, accountability and combating corruption in allocation of resources from exploitation of natural resources;

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### 3.0 National Gap Analysis

The current governance framework was assessed to identify where the gaps exist so that constraints to development of the Blue Economy and particularly CMSP can be addressed in a timely manner during the CROP. The current situation and gaps at the national level for OECS Member States participating in CROP are provided in the sub-sections which follow:

#### 3.1 Component 1: Policy, Legal, Institutional and Regulatory Framework

The policy legal, institutional and regulatory framework for coastal and marine spatial planning addresses five key issues or sub-components:

1. Laws, policies and strategies related to coastal and marine management
2. Legal framework to support and protect land tenure, ownership and use rights
3. Broader development policies integrated with coastal and marine policies
4. Institutional frameworks
5. Financial incentives, economic instruments and benefits sharing

Table 2.1 provides the findings of the Situation and Stakeholder Analysis on the five sub-components above. The main recommendations are:

- Outdated legislation which must be modernized to suit current and emerging trends in resource management. There was limited or no public participation in the development of the existing legal framework and updating them through public participation will ensure that they are culturally appropriate and in keeping with current state of the environment.
- International conventions and MEAs must be incorporated into national legislation during the process of modernization.
- Framework for public participation needs to be developed with the entry into force of Freedom of Information Act and supporting legislation.
- Financial incentives such as concessions are distortionary resulting in over-exploitation of natural resources; there is need for review and overhaul of Government duty free and tax incentive regimes;
- Economic instruments must be used to manage coastal and marine resources.

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**Table 3.1 Component 1 of Governance Framework: Policy Legal, Institutional and Regulatory Framework for CMSP in OECS MS**

Component		DOMINICA	GRENADA	ST. KITTS & NEVIS	ST LUCIA	ST VINCENT & G
<b>COMPONENT ONE POLICY, LEGAL, INSTITUTIONAL AND REGULATORY FRAMEWORK</b>	<b>Laws, policies and strategies related to coastal and marine management</b>	Robust policy and legal framework; need updating with codes & regulations; MEAs need to be adopted into local legislation; need environmental law	Robust policy and legal framework; need updating with codes & regulations; MEAs need to be adopted into local legislation; need environmental law	Robust policy and legal framework; need updating with codes & regulations; MEAs need to be adopted into local legislation; need environmental law	Robust policy and legal framework; need updating with codes & regulations; MEAs need to be adopted into local legislation; need environmental law	Robust policy and legal framework; need updating with codes & regulations; MEAs need to be adopted into local legislation; need environmental law
	<b>Legal framework to support and protect land tenure, ownership and use rights</b>	Laws for private property rights; need to develop framework for public lands, forests, user fees for forest and eco-trails; marine spaces; limited arrangements for national parks and protected areas; Kalinago Territory need to improve framework and develop by-laws to protect communal natural resources	Laws for private property rights; need to develop framework for public lands, forests, marine spaces; limited arrangements for national parks and protected areas;	Laws for private property rights; need to develop framework for public lands, forests, marine spaces; limited arrangements for national parks and protected areas; User fees for some forest trails.	Laws for private property rights; need to develop framework for public lands, forests, marine spaces; User fees for some forests and eco-trails; limited arrangements for national parks and protected areas;	Laws for private property rights; need to develop framework for public lands, forests, marine spaces; limited arrangements for national parks and protected areas;
	<b>Integration of Development Policies with CMSP</b>	National Physical Development Plans; Land Use Policy; Forest Policy;	National Physical Development Plans; Land Use Policy; Forest Policy;	National Physical Development Plans; Land	National Physical Development Plans; Land Use Policy; Forest Policy;	National Physical Development Plans; Land Use Policy; Forest Policy;

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		NO ICZM Policy; no marine policy	ICZM Policy; no marine policy	Use Policy; Forest Policy; Marine Policy and Zoning	ICZM Policy; No marine policy	Marine Policy; no ICZM Policy
	<b>Institutional Framework</b>	Cultural norms and practices dominant use of natural resources; Kalinago Territory traditional practices dominant how natural resources are managed	Cultural norms and practices dominant use of natural resources; Conflict with implementation of formal rules and regulations for natural resources management	Cultural norms and practices dominant use of natural resources; Conflict with implementation of formal rules and regulations for natural resources management,	Cultural norms and practices dominant use of natural resources; Conflict with implementation of formal rules and regulations for natural resources management	Cultural norms and practices dominant use of natural resources; Conflict with implementation of formal rules and regulations for natural resources management
	<b>Financial Incentives, Economic Instruments and Benefits sharing</b>	Tax free concessions fishing and tourism sector; no license fees; no quotas; limited use of economic instruments for resource management	Tax free concessions fishing and tourism sector; no license fees; no quotas; limited use of economic instruments for resource management	Tax free concessions fishing and tourism sector; no license fees; no quotas; limited use of economic instruments for resource management	Tax free concessions fishing and tourism sector; no license fees; no quotas; limited use of economic instruments for resource management	Tax free concessions fishing and tourism sector; no license fees; no quotas; limited use of economic instruments for resource management

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### **3.2 Component 2: Planning and Decision-making Process**

To provide an analysis of the second component or dimension of governance, five sub-components were considered:

1. The Planning Context and Levels of Planning
2. Planning Process
3. Stakeholder Participation
4. Transparency and accountability
5. Stakeholder capacity and action

Table 2.2 provides a summary of the assessment of the five-subcomponents. The key findings and recommendations from the Situation and Stakeholder Analysis are:

- Planning in the OECS MS is driven by current socio-economic factors so that planning is focused on short term responses to provide jobs, reduce the debt to GDP ratio and sustain economic growth. Environmental considerations are not factored into the planning context resulting in degradation of natural assets. OECS MS must integrate natural resources management into the economic planning context to achieve sustainable development.
- The planning process needs to evolve to include decision support systems to make operational an ecosystems-based approach to coastal and marine spatial planning;
- The legal framework for stakeholder participation must be improved to allow for meaningful participation in the planning and development process.
- Greater transparency and accountability are needed in the planning and decision-making process. Oversight mechanisms must be developed at the national and regional level to control allocation and use of coastal and marine resource rights.
- Stakeholder capacity (private sector/civil society) and action needs to be encouraged and strengthened in the planning and decision-making process, to achieve sustainable development;

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**Table 3.2 Component 2 Governance Framework – Planning and Decision-Making Process for CMSP in OECS MS**

Component		Dominica	Grenada	St. Kitts and Nevis	St Lucia	St. Vincent & Grenadines
COMPONENT TWO PLANNING AND DECISION MAKING PROCESS	<b>Planning Context and Levels of Planning</b>	Socio-economic drivers (job creation and economic growth); project driven; sectoral development plans	Socio-economic drivers (job creation and economic growth); project driven	Sector and project basis in response to socio-economic drivers (job creation and economic growth)	Sector and project basis in response to socio-economic drivers (job creation and economic growth)	Sector and project basis in response to socio-economic drivers (job creation and economic growth)
	<b>Planning Process &amp; Decision Support Systems</b>	Public sector; lack of decision support systems and integration of hazard risk and environmental analysis	Public sector; lack of decision support systems and integration of hazard risk and environmental analysis	Public sector; Private active; lack of decision support systems and integration of hazard risk and environmental analysis	Public sector; lack of decision support systems and integration of hazard risk and environmental analysis	Public sector; lack of decision support systems and integration of hazard risk and environmental analysis
	<b>Public Participation</b>	Low participation on setting objectives for development; Legal framework needs improvement; EIA, Fisheries Committee, no mechanism to track implementation and evaluate impact	Low participation on setting objectives for development; Legal framework needs improvement; EIA, Fisheries Committee, no mechanism to track implementation and evaluate impact	Low participation on setting objectives for development; Legal framework needs improvement; EIA, Fisheries Committee, no mechanism to track implementation and evaluate impact	Low participation on setting objectives for development; Legal framework needs improvement; EIA, Fisheries Committee, no mechanism to track implementation and evaluate impact	Low participation on setting objectives for development; Legal framework needs improvement; EIA, Fisheries Committee, no mechanism to track implementation and evaluate impact
	<b>Transparency &amp; Accountability</b>	No publication of CBI data; indicators need to be developed to track progress; No Freedom of Information Act (draft)	No publication of CBI data; Investigations into mis-management of statutory bodies; indicators need to be developed to track progress; No Freedom of Information Act (draft)	Low; Issues with CBI and management of Frigate bay development funds; Sugar diversification funds; indicators need to be developed to track progress; No Freedom of Information Act enforced	Moderate and improving; indicators need to be developed to track progress; No Freedom of Information Act enforced.	Low-stakeholders demanding information on large projects; indicators need to be developed to track progress; No Freedom of Information Act enforced
	<b>Stakeholder Capacity and actions</b>	High capacity: low action Constrained by public policy and lack of financial capital to undertake development projects; Low capacity and action in Kalinago Community	High capacity: low action Constrained by public policy and lack of financial capital to undertake development projects	High capacity: low action Constrained by public policy and lack of financial capital to undertake development projects	High capacity: low action Constrained by public policy and lack of financial capital to undertake development projects	High capacity: low action Constrained by public policy and lack of financial capital to undertake development projects

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### **3.3 Component 3: Implementation, monitoring and compliance**

The third component or dimension of governance relates to implementation, monitoring and compliance with the policy, legal and regulatory framework for coastal and marine resources management. There are five areas of analysis in determining adequacy of governance with respect to this component:

1. Administration of coastal and marine resources
  2. Law enforcement
  3. Administration of land tenure and property rights
  4. Cooperation and coordination
  5. Measures to address corruption
- Administrative arrangements for natural resources management are disjointed and there is need for a central coordinating environmental management and protection agency to act as a network administrative organization. This NAO can be a regional body will serve as a commission or authority staffed with the region's best professionals to provide independent oversight, research, support to formulate policies, legislation and management strategies, track progress in implementation. The authority will reduce the need to deliver technical support to member states through short term disjointed consulting engagements;
  - The NAO will improve the law enforcement capabilities in OECS member states, reduce duplication of efforts and strengthen national capacity for environmental management;
  - Legal land registry needs to be improved; a system for benefits sharing of public natural resource rights must be developed to avoid conflict especially with marine spatial planning;
  - A regional oversight mechanism is needed to provide measures for dealing with corruption. Arrangements made with private interests' groups and CBI investors to use public lands for development must be made transparent.

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**Table 3.3 Component 3 Governance Framework: Implementation, monitoring and Compliance for CMSP in OECS MS**

<b>Component</b>		<b>Dominica</b>	<b>Grenada</b>	<b>St. Kitts and Nevis</b>	<b>St Lucia</b>	<b>St. Vincent &amp; Grenadines</b>
<b>COMPONENT THREE IMPLEMENTATION, MONITORING AND COMPLIANCE</b>	<b>Administration of coastal and marine resources</b>	Fisheries Division; maritime administration office; no ICZM unit; limited capacity; GIS and Physical Planning Unit with hardware & software for planning; urban development unit	Fisheries Division; maritime administration officer duties merged with Port Authority although distinct legal functions; ICZM task force; limited capacity; Physical Planning Unit has limited capacity hardware & software for planning; Land Use Dept has GIS capability	Strong Fisheries Division; strong maritime administration office; no ICZM; limited capacity; Strong GIS and Physical Planning Unit with hardware & software for planning; urban development unit	Fisheries Division; Strong maritime administration office; functioning coastal zone management unit; limited capacity; GIS and Physical Planning Unit with hardware & software for planning	Fisheries Division; Strong maritime administration office; no coastal zone management unit; limited capacity; GIS and Physical Planning Unit with hardware & software for planning
	<b>Law enforcement</b>	Low – needs to improve; Coast guard; MPA officers; no environmental wardens	Low – needs to improve; Coast guard; MPA officers; no environmental wardens	Low – needs to improve; Coast guard; MPA officers; no environmental wardens	Low – needs to improve; Coast guard; MPA officers; no environmental wardens	Low – needs to improve; Coast guard; MPA officers; no environmental wardens
	<b>Administration of land tenure and property rights</b>	Land registry; no legal cadastral data; land and property taxes; judicial system; mediation and dispute resolution; no taxes in Kalinago Territory	Land registry; no legal cadastral data; land and property taxes; judicial system; mediation and dispute resolution;	Land registry; no legal cadastral data; land and property taxes judicial system; mediation and dispute resolution;	Land registry; no legal cadastral data; judicial system; mediation and dispute resolution;	Land registry; no legal cadastral data; judicial system; mediation and dispute resolution;
	<b>Cooperation and coordination</b>	Lack of coordinating mechanisms for coastal and marine management; strong regional mechanisms	Lack of coordinating mechanisms for coastal and marine management; strong regional mechanisms	Lack of coordinating mechanisms for coastal and marine management; strong regional mechanisms	Lack of coordinating mechanisms for coastal and marine management; strong regional mechanisms	Lack of coordinating mechanisms for coastal and marine management; strong regional mechanisms
	<b>Measures to address corruption</b>	Need watch dog and oversight mechanism	Need watch dog and oversight mechanism	Need watch dog and oversight mechanism	Need watch dog and oversight mechanism	Need watch dog and oversight mechanism

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### 4.0 Priority Areas for Action

The areas for action are grouped based on the findings presented for analysis of the Governance Framework in Section 2 above. Separate attention is also given to prioritizing action for reducing the environmental pressures that result in degradation of the coastal and marine resources in OECS MS. A general requirement is the need to develop indicators for tracking progress in governance of coastal and marine resources. Each member state was required to provide national priority selection to feed in the SESA process. Responses were provided by Dominica, Grenada and St. Lucia and these are attached as annexes to the report. The following is the summary ranking developed by the consultant which will also apply for St. Kitts and Nevis and St. Vincent and the Grenadines, as informed by the situation analysis. Each country must reassess these priority areas during implementation of the CROP.

#### 4.1 Recommendations– Policy, Legal, Institutional and Regulatory Framework

**Priority 1: Immediate Action (2018-2019)**

**Priority 2: Short-term Action (2019-2020)**

**Priority 3: Medium to long term (2019-2022)**

Sub-Components		RECOMMENDATIONS FOR ACTION	PRIORITY
	<b>Laws, policies and strategies related to coastal and marine management</b>	• Enact Regulations for Physical Planning Act to include regulations for EIAs	1
		• Adopt international MEAs into domestic legislation	2
		• Revise Forestry and Fisheries Legislation to include coastal zone management	1
		• Revise and update Beach Protection Act to include coastal erosion and sea level rise	2
		• Develop National Ocean Governance Policy	1
	<b>Legal framework to support and protect land tenure,</b>	• Develop legal framework for user rights of public lands, forests, beaches, mangroves, coastal and marine spaces	2
		• Revise user rights and fee structures for national parks and protected areas	1

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	<b>ownership and use rights</b>	<ul style="list-style-type: none"> <li>Kalinago Territory need to improve framework and develop by-laws to protect communal natural resources</li> </ul>	1
	<b>Integration of Development Policies with CMSP</b>	<ul style="list-style-type: none"> <li>National Physical Development Plans integrate Climate Change Adaptation Plans</li> </ul>	2
		<ul style="list-style-type: none"> <li>Tourism Master Plan integrate climate change and sea level rise</li> </ul>	1
		<ul style="list-style-type: none"> <li>Forestry Policy and Action Plans; include mangroves and protection of coastal wetlands</li> </ul>	2
		<ul style="list-style-type: none"> <li>Housing Policy and Settlement Plan integrate into CMSP</li> </ul>	2
		<ul style="list-style-type: none"> <li>Multi-hazard risk assessment</li> </ul>	1
		<ul style="list-style-type: none"> <li>Develop linkages with national development plans and poverty reduction strategies</li> </ul>	1
	<b>Institutional Framework</b>	<ul style="list-style-type: none"> <li>Develop institutional framework to protect traditional resource rights for sustainable livelihoods of vulnerable and marginalized communities</li> </ul>	
		<ul style="list-style-type: none"> <li>Kalinago Council needs to manage traditional practices for natural resources use; develop by-laws to manage land to reduce conflict between formal and informal</li> </ul>	1
		<ul style="list-style-type: none"> <li>Protect right of public access to the seashore and marine resources in CMSP</li> </ul>	1
	<b>Financial Incentives, Economic Instruments and Benefits sharing</b>	<ul style="list-style-type: none"> <li>Revise tax regime and concessions for fishing and tourism sectors to correct distortions which contribute to environmental degradation</li> </ul>	2
		<ul style="list-style-type: none"> <li>Introduce structured license fees for commercial fisherfolk and tourist sport fishing</li> </ul>	2
		<ul style="list-style-type: none"> <li>Develop quota system for extraction of natural resources for all users (private and commercial)</li> </ul>	2
		<ul style="list-style-type: none"> <li>Develop regime of economic instruments for resource management</li> </ul>	2

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### 4.2 Recommendations for Planning and Decision-making process

(add other areas for action as necessary and rank priority as 1, 2 or 3)

Sub-Component		RECOMMENDATIONS FOR ACTION	PRIORITY
COMPONENT TWO PLANNING AND DECISION MAKING PROCESS	Planning Context and Levels of Planning	<ul style="list-style-type: none"> <li>Update Socio-economic development plans to include projects and actions for reduction of environmental pressures which lead to environmental degradation (see table 4.4 for areas for action)</li> </ul>	1
		<ul style="list-style-type: none"> <li>Conduct training in use of economic valuation, environmental assessments, hazard risk assessment and climate change scenarios to evaluate Public Sector Investment Projects</li> </ul>	3
		<ul style="list-style-type: none"> <li>Update Sectoral development plans to include provisions for protection of coastal and marine resources as appropriate</li> </ul>	3
		<ul style="list-style-type: none"> <li>Promote integrated development planning</li> </ul>	3
	Planning Process & Decision Support Systems	<ul style="list-style-type: none"> <li>Improve participation of Private sector and citizens in the planning and decision-making process across all levels of planning</li> </ul>	1
		<ul style="list-style-type: none"> <li>Operationalize ecosystems-based approach in coastal and marine spatial planning process</li> </ul>	1
		<ul style="list-style-type: none"> <li>Develop decision support systems and integrate hazard risk and environmental analyses into the decision-making process</li> </ul>	1
	Public Participation	<ul style="list-style-type: none"> <li>Institutionalize public participation; include standing citizen advisory groups in setting priorities for development plans</li> </ul>	1
		<ul style="list-style-type: none"> <li>Enforce Freedom of Information Act</li> </ul>	2
		<ul style="list-style-type: none"> <li>Develop guidelines for public participation in environmental and social impact assessments; make stakeholder consultations for EIAs a mandatory requirement</li> </ul>	1
		<ul style="list-style-type: none"> <li>Adopt principles and provisions of Regional Agreement on right to access to information public participation and environmental justice into national legislation</li> </ul>	2
		<ul style="list-style-type: none"> <li>Develop indicators to track progress in implementation of policies, projects, plans etc and evaluate impact</li> </ul>	1
		<ul style="list-style-type: none"> <li>Improve transparency of CBI Projects which utilize public coastal and marine resources</li> </ul>	2

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	<b>Transparency &amp; Accountability</b>	• Make public all lease, licenses, permits, quotas, concessions granted for coastal and marine resource use/development	2
		• Develop indicators to track progress in implementation of Freedom of Information Act	1
		• Develop regional oversight mechanism for public authorities	
	<b>Stakeholder Capacity and actions</b>	• Correct public policy failures which limit stakeholder action in development planning and decision-making process	3
		• Create program of action to build capacity for stakeholder action in Kalinago Territory	1
		• Develop national environmental education strategy for all levels of decision-makers	2
		• A well-funded and comprehensive communications strategy should be developed that engages all stakeholders, and utilizes diverse media outlets (e.g., web, public lectures, and stakeholder meetings) to reach the public.	1

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### 4.3 Recommendations for Implementation, Monitoring and Compliance (add other areas for action as necessary and rank priority as 1, 2 or 3)

Sub-Component		RECOMMENDATIONS FOR ACTION	PRIORITY
		<ul style="list-style-type: none"> <li>Indicators and benchmarks for tracking environmental quality must be developed</li> </ul>	1
	Law enforcement	<ul style="list-style-type: none"> <li>Improve capacity of judiciary for enforcement of laws and regulations</li> </ul>	3
		<ul style="list-style-type: none"> <li>Develop incentives for public participation in enforcement</li> </ul>	3
		<ul style="list-style-type: none"> <li>Develop financial and tax incentives for voluntary compliance</li> </ul>	2
	Administration of land tenure and property rights	<ul style="list-style-type: none"> <li>Develop regional environmental commission, tribunal or court</li> </ul>	3
		<ul style="list-style-type: none"> <li>Improve access to judiciary; educate citizens on rights and process for judicial intervention in resolving conflicts</li> </ul>	2
		<ul style="list-style-type: none"> <li>Kalinago Council - Develop land and property administration system for Territory</li> </ul>	2
	Cooperation and coordination	<ul style="list-style-type: none"> <li>Develop regional environmental protection and management authority</li> </ul>	3
		<ul style="list-style-type: none"> <li>Develop standing committee, citizen development commissions for CMSP</li> </ul>	1
		<ul style="list-style-type: none"> <li>Institutionalize roles and responsibilities of regional coordinating agencies</li> </ul>	2
	Measures to address corruption	<ul style="list-style-type: none"> <li>Develop regional oversight mechanism for combating corruption</li> </ul>	3

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### 4.4 Recommendations for addressing environmental pressures

Below are issues which stakeholders noted as critical and requiring action to protect coastal and marine resources from degradation. Consultant ranking of issues using same criteria rating as above: 1, 2 or 3

Coastal Zone	Key Issues and Challenges	Recommendations for Action/Strategic Objectives	Priority
<b>Terrestrial Zone – upper catchment</b>	<ul style="list-style-type: none"> <li>Protected areas</li> <li>Deforestation</li> <li>Natural Hazards                             <ul style="list-style-type: none"> <li>-Bush fires</li> <li>-Landslides</li> <li>-Wild pigs</li> </ul> </li> <li>Erosion and pollution due to land clearing for Agricultural production</li> <li>Invasive Species</li> <li>Climate Change</li> <li>Decrease water levels in watershed areas (damming of water above watershed)</li> <li>Settlements along watershed</li> </ul>	Watershed management plans for all major watersheds (ridge to reef)	2
		Habitat Survey and Assessment (Forestry)	1
		Permanent Sample plots (Forestry)	2
		Habitat mapping	2
		River stream flow assessment	2
		Develop stream/surface water quality standards	2
		Establish silviculture practices, conservation buffer zones for watershed development	2
		Improve/develop climate data collection and management system	1
		Integrate future climate/environment scenarios in management plans and policies	1
<b>Terrestrial Zone</b>	<ul style="list-style-type: none"> <li>Quarrying</li> <li>Slash and burn agriculture</li> <li>Commercial and residential development</li> <li>Pig farms</li> <li>Infrastructural development (roads, utilities)</li> </ul>	Develop regulations, codes of best practice for each sector	3
		Ban on burning steep slopes, dry forests and sensitive areas	3
		EIAs, Land Development Code; Land Use Policy	1
		Waste water discharge standards and permits for industries	2

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	<ul style="list-style-type: none"> <li>• Liquid and solid waste pollution (agriculture, factory industries, etc)</li> </ul>	<ul style="list-style-type: none"> <li>• Future planning, space allocation for municipal facilities (landfills; wastewater treatment plants)</li> </ul>	<b>1</b>
<b>Coastal zone (immediate land sea interface)</b>	<ul style="list-style-type: none"> <li>• Coastal communities</li> <li>• Urban developments</li> <li>• Infrastructure</li> <li>• High density of human activities</li> <li>• Solid waste disposal</li> <li>• Waste water management</li> <li>• Protected areas (conflict with private land ownership)</li> <li>• Agricultural activities</li> <li>• Sand mining</li> <li>• Storm surges</li> <li>• Climate change</li> <li>• Local communities lack proper sanitary facilities</li> </ul>	<ul style="list-style-type: none"> <li>• Develop regulations, codes of best practice for each sector</li> </ul>	<b>3</b>
		<ul style="list-style-type: none"> <li>• Ban on burning steep slopes, dry forests and sensitive areas</li> </ul>	<b>3</b>
		<ul style="list-style-type: none"> <li>• EIAs, Land Development Code; Land Use Policy</li> </ul>	<b>1</b>
		<ul style="list-style-type: none"> <li>• Waste water discharge standards and permits for industries</li> </ul>	<b>2</b>
		<ul style="list-style-type: none"> <li>• Future planning, space allocation for municipal facilities (landfills; wastewater treatment plants)</li> </ul>	<b>1</b>
		<ul style="list-style-type: none"> <li>• Integrate housing policies and plans into coastal master plans;</li> </ul>	<b>1</b>
		<ul style="list-style-type: none"> <li>• Allocate space for cemeteries, parks,</li> </ul>	<b>1</b>
		<ul style="list-style-type: none"> <li>• Allocate space for storage of fishing vessels during storm surges, hurricanes;</li> </ul>	<b>1</b>
<b>3 nautical miles</b>	<ul style="list-style-type: none"> <li>• Solid and liquid waste management</li> <li>• Yachts, ships and marina (no holding tanks, anchoring damage to seabed)</li> <li>• Ballast water exchange</li> <li>• Marine invasive species</li> <li>• Heavy sedimentation</li> <li>• Climate change</li> <li>• Marine biodiversity destruction</li> </ul>	<ul style="list-style-type: none"> <li>• Plan for Tsunamis</li> </ul>	<b>1</b>
		<ul style="list-style-type: none"> <li>• Improve disposal and treatment facilities for accepting marine wastes</li> </ul>	<b>2</b>
		<ul style="list-style-type: none"> <li>• Monitoring and enforcement of IMO codes of best practice for marinas and boatyards</li> </ul>	<b>2</b>
		<ul style="list-style-type: none"> <li>• Monitoring of sea level rise (mean high tide gauges)</li> </ul>	<b>1</b>
		<ul style="list-style-type: none"> <li>• Improve watershed management;</li> <li>• Create stormwater retention and detention systems as feature in landscape as part of CMSP</li> </ul>	<b>2</b> <b>1</b>

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	<ul style="list-style-type: none"> <li>• Super structural development (marinas, jetties, waterbased type accommodations)</li> </ul>		
<b>Territorial Boundary</b>	<ul style="list-style-type: none"> <li>• Oil spills</li> <li>• Liquid and solid waste disposal</li> <li>• IUU Fishing</li> <li>• Tourism water based activities (pollution-exhaust fumes)</li> <li>• Waste water management</li> <li>• Climate change (increase SST, Coral bleaching)</li> <li>• Ballast water exchange</li> </ul>	<ul style="list-style-type: none"> <li>• Strengthen national oil spill response capability (public/private partnership)</li> <li>• Create regional oil spill response mechanism</li> <li>• Improve landside disposal and treatment facilities for accepting marine wastes</li> <li>• Monitoring and enforcement of IMO codes of best practice for marinas and boatyards</li> <li>• Monitoring of sea level rise (mean high tide gauges)</li> <li>• Regional coral reef monitoring program</li> <li>• Fish stock and marine resource assessment</li> <li>• zone marine tourism activities; develop codes and best practices</li> </ul>	<p><b>2</b></p> <p><b>2</b></p> <p><b>2</b></p> <p><b>1</b></p> <p><b>1</b></p> <p><b>1</b></p> <p><b>1</b></p>
<b>EEZ</b>	<ul style="list-style-type: none"> <li>• Oil spills</li> <li>• Liquid and solid waste disposal</li> <li>• IUU Fishing</li> <li>• Tourism water based activities (pollution-exhaust fumes)</li> <li>• Waste water management</li> <li>• Climate change (increase SST, Coral bleaching)</li> </ul>	<ul style="list-style-type: none"> <li>• Strengthen national oil spill response capability (public/private partnership)</li> <li>• Create regional oil spill response mechanism</li> <li>• Improve land side disposal and treatment facilities for accepting marine wastes</li> <li>• Monitoring and enforcement of IMO codes of best practice for marinas and boatyards</li> <li>• Monitoring of sea level rise (mean high tide gauges)</li> <li>• zone marine tourism activities; develop codes and best practices</li> </ul>	<p><b>2</b></p> <p><b>2</b></p> <p><b>1</b></p> <p><b>2</b></p> <p><b>1</b></p> <p><b>1</b></p>

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### 4.5 Recommendations from the CROP Feasibility Study

They are grouped under categories however there is no ranking of issues or category:

#### 4.5.1 Stakeholder Participation

- To help strengthen support and buy-in for MSP, each CROP country should clearly articulate their own country needs for MSP and the benefits it will provide.
- A stakeholder analysis should be completed at the start of the process to determine who should be involved, the best ways to communicate with them, and when they should be brought into the process.
- A well-funded and comprehensive communications strategy should be developed that engages all stakeholders, and utilizes diverse media outlets (e.g., web, public lectures, and stakeholder meetings) to reach the public.
- A regional Stakeholder Advisory Committee should be created to provide guidance and recommendations to ensure full stakeholder participation in MSP processes.

#### 4.5.2 Planning Context and Decision-making Process

- Each CROP country should clearly articulate their own vision for their country that will align with the regional project vision and match the national policy direction of their country. This vision statement should be realistic, credible, and attractive such that it attracts commitment and energizes people, while creating meaning to stakeholders.
- The guiding principles of the MSP should be: equitable, adaptive, holistic, transparent, knowledge driven, public and political buy-in and accountability, sustainability, ecosystem-based management, precautionary principle, integrated management, duty of care and accountability, multi-stakeholder participation, user pays and other economic instruments, and simplicity.
- The goals for the MSP should be guided by the possible threats to the marine environment in the country; the social, environmental, economic, and cultural policy direction of the country; build upon national policies and regional and international commitments; and be guided by proposed future uses of the marine space.
- The objectives of the MSP must be SMART and lead to the development of strategies that are clear, realistic, pragmatic, measurable, match the unique situation with the

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country, and should consider what worked and didn't under similar and related projects and initiatives.

- The geographic area of coverage should be from the coastal watershed / catchment area out to the furthest seaward boundary under the jurisdiction of the country.

### **4.5.3 Regional Cooperation and Coordination**

- For a regional MSP to be effective, the World Bank and the OECS Commission must solicit the buy-in and participation from as many countries sharing the island chain as possible.
- Regional agencies and projects should be engaged to help encourage participation from non-CROP countries.
- The regional Ocean Governance Team should play a key role in guiding the work of the national and regional MSP to ensure that decisions are aligned with international best practice.
- A regional data base of persons qualified in MSP relevant fields should be created to allow for exchange and utilization of national and regional technical experts in the planning and implementation of MSP.
- Collaboration mechanisms with potential regional partners should be promoted as there are several ways that they can support CROP implementation including mobilizing finances, providing training, undertaking project work, supporting stakeholder participation, and guiding the development of the required legislative and operational framework.
- The key activities that should be completed prior to the final approval by the GEF and project kick-off include concluding boundary delimitation discussions with neighboring countries, soliciting buy-in and participation from other countries that are not part of the CROP, and mobilizing additional financial resources.

### **4.5.4 Project Implementation**

- A financial management plan should be developed for the CROP that identifies the resources available, the funding gaps, and articulates a plan on how these gaps can be filled.

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- The OECS Commission, the World Bank, and the governments of the CROP countries should work collectively to raise additional resources for the project from direct allocations from government budgets, bilateral and multilateral donors, private sector, and collaborations with other regional projects and initiatives.
- Considering the limited funding available, The World Bank, the OECS Commission, and the governments of the OECS countries must work assiduously to get additional project funding in a timely manner so that there are sufficient funds to do the required work and there is continuity to the CROP activities after the initial 4 years.
- The timeline for the planning stage of the MSP (CROP project timeline) should be a minimum of 3 – 5 years, but with the understanding that in some countries it may take longer (*a phased-in approach may be needed in these countries*).
- Although boundary delamination will not be a central theme during the implementation of CROP, it is critically important and should be conducted in parallel to CROP's implementation. Clearly defined boundaries will (i) allow countries jurisdiction to enforce legislation governing activities within their waters, (ii) help transboundary issues, and (iii) help assess the geographic area available for marine activities that extend beyond the 12nm territorial sea (aligned with ECROP Policy 1).
- A phased-in approach should be followed for MSP planning in the CROP countries.
- The decision of which of the 5 options (pilot CROP in 2 or 3 OECS countries; complete the MSP process for only certain areas in each country; allow the MSP to extend out only to the 200m depth contour; design data collection activities to suit the available time and funding resources; and focus the MSP efforts on only a few key marine uses) to allow for the implementation of a phased-in approach should be based on the amount of time and finances available for the CROP implementation and the current enabling conditions present in each country .
- Two implementation models are recommended for the CROP - one model proposing completion of most of the national level project activities by consultants and the other one proposing implementation of activities through local agencies with support from consultants.

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### 4.5.5 Policy Legal and Regulatory

- A regional Legal Advisory Task Force with representation by the Attorney General from each OECS country should be created very early in the process to provide legal guidance for the MSP.
- New legislation should be created early in the MSP process to provide the authority to make the spatial management plans, which will be the outputs of the MSP, binding. However, in cases where the legislative process will be too lengthy, existing legislation should be used if available so as not to delay project activities.
- Institutional and legislative review will be needed to determine the most appropriate agency to lead the planning for MSP. For Saint Lucia and Grenada, the CZMUs should be strengthened to serve in this role. For Dominica, St. Kitts and Nevis and St. Vincent and the Grenadines creation of a new agency is advised but this may have to be conducted in parallel to the CROP.

### 4.5.6 Inter-sectoral coordination

- There are existing intersectoral committees present in Saint Lucia (Coastal Zone Management Advisory Committee), Grenada (Coastal Zone Task Force) that can be used to oversee the MSP. St. Vincent and the Grenadines (Ocean Governance Coordination Committee) and St. Kitts and Nevis (National Maritime Coordination Committee) once endorsed by cabinet can serve as this coordinating body. For Dominica, since there is no clear coordination committee that can serve in this role the Cabinet should appoint a new committee.
- Assessments should be completed to determine best practice for collaborative mechanisms among organizations in each country and this should be used to support MSP efforts in the countries.

### 4.5.7 Data Collection

- Objectives for data collection should be well articulated at the start of the MSP planning process to help streamline data collection and management.

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- The MSP process in the countries should rely on the best available science and information that is collected through well tested and documented methodologies that support data comparisons and sharing across countries.
- A regional Science Advisory Committee that informs data decisions should be constituted.
- MSP data collection activities must be guided by both current and future uses of the ocean.
- A comprehensive knowledge management system should be created to document best practices and pitfalls of the CROP implementation at the national and regional levels.

### 4.5.8 Monitoring and Evaluation

- Monitoring and evaluation will be a critical process that should be completed throughout the MSP planning processes and should be implemented by an external monitoring and evaluation team.
- The MSP base year should be determined early in the process and should be based on the national goals and objectives of each country MSP effort and should be taken as the date when implementation starts.
- Contingencies must be built into CROP planning to allow the team to adapt to changing situations.

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### ANNEX I: DOMINICA – Priority Selection

Recommendations– Policy, Legal, Institutional and Regulatory Framework

Sub-Components		RECOMMENDATIONS FOR ACTION	PRIORITY
	<b>Laws, policies and strategies related to coastal and marine management</b>	• Revise Forestry and Fisheries Legislation to include coastal zone management	1
		• Revise and update Beach Protection Act to include coastal erosion and sea level rise	2
		• Develop National Ocean Governance Policy	1
		• Revision and enforcement of Fisheries marine related laws	1
	<b>Legal framework to support and protect land tenure, ownership and use rights</b>	• Develop legal framework for user rights of public lands, forests, beaches, mangroves, coastal and marine spaces	2
		• Revise user rights and fee structures for national parks and protected areas	1
		• Kalinago Territory need to improve framework and develop by-laws to protect communal natural resources	1
	<b>Integration of Development Policies with CMSP</b>	• National Physical Development Plans integrate Climate Change Adaptation Plans	2
		• Tourism Master Plan integrate climate change and sea level rise	1
		• Forestry Policy and Action Plans; include mangroves and protection of coastal wetlands	2
		• Housing Policy and Settlement Plan integrate into CMSP	2
		• Multi-hazard risk assessment	1
		• Develop linkages with national development plans and poverty reduction strategies	1
		• Ensure that the Integrated Coastal Management (ICM) with EbA which is being developed with the Government of the Commonwealth of Dominica via Green Climate Fund (GCF) is integrated into the CMSP	1
		• The execution of vulnerable risk mapping assessment for coastal the communities engaged in EbA of the ICM	1

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	<b>Institutional Framework</b>	<ul style="list-style-type: none"> <li>Develop institutional framework to protect traditional resource rights for sustainable livelihoods of vulnerable and marginalized communities</li> </ul>	
		<ul style="list-style-type: none"> <li>Kalinago Council needs to manage traditional practices for natural resources use; develop by-laws to manage land to reduce conflict between formal and informal</li> </ul>	1
		<ul style="list-style-type: none"> <li>Protect right of public access to the seashore and marine resources in CMSP</li> </ul>	1
	<b>Financial Incentives, Economic Instruments and Benefits sharing</b>	<ul style="list-style-type: none"> <li>Revise tax regime and concessions for fishing and tourism sectors to correct distortions which contribute to environmental degradation</li> </ul>	2
		<ul style="list-style-type: none"> <li>Revise the structure of license fees for fisher folk and marine related tourism</li> </ul>	2
		<ul style="list-style-type: none"> <li>Develop quota system for extraction of natural resources for all users (private and commercial)</li> </ul>	2
		<ul style="list-style-type: none"> <li>Develop regime of economic instruments for resource management</li> </ul>	2
		<ul style="list-style-type: none"> <li>Waiver of Custom duties, and Vat on boats, equipment, machinery, hardware, software, for MPAs, CSOs and NGOs that are engaged in environmental , conservation and preservation efforts</li> </ul>	2

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### Recommendations for Planning and Decision-making process

Sub-Component		RECOMMENDATIONS FOR ACTION	PRIORITY
COMPONENT TWO PLANNING AND DECISION MAKING PROCESS	Planning Context and Levels of Planning	<ul style="list-style-type: none"> <li>Update Socio-economic development plans to include projects and actions for reduction of environmental pressures which lead to environmental degradation (see table 3.4 for areas for action)</li> </ul>	1
		<ul style="list-style-type: none"> <li>Conduct training in use of economic valuation, environmental assessments, hazard risk assessment and climate change scenarios to evaluate Public Sector Investment Projects</li> </ul>	3
		<ul style="list-style-type: none"> <li>Update Sectoral development plans to include provisions for protection of coastal and marine resources as appropriate</li> </ul>	3
		<ul style="list-style-type: none"> <li>Promote integrated development planning</li> </ul>	3
	Planning Process & Decision Support Systems	<ul style="list-style-type: none"> <li>Improve participation of Private sector and citizens in the planning and decision-making process across all levels of planning</li> </ul>	1
		<ul style="list-style-type: none"> <li>Operationalize ecosystems-based approach in coastal and marine spatial planning process</li> </ul>	1
		<ul style="list-style-type: none"> <li>Develop decision support systems and integrate hazard risk and environmental analyses into the decision-making process</li> </ul>	1
	Public Participation	<ul style="list-style-type: none"> <li>Institutionalize public participation; include standing citizen advisory groups in setting priorities for development plans</li> </ul>	1
		<ul style="list-style-type: none"> <li>Enforce Freedom of Information Act</li> </ul>	2
		<ul style="list-style-type: none"> <li>Develop guidelines for public participation in environmental and social impact assessments; make stakeholder consultations for EIAs a mandatory requirement</li> </ul>	1
		<ul style="list-style-type: none"> <li>Adopt principles and provisions of Regional Agreement on right to access to information public participation and environmental justice into national legislation</li> </ul>	2
		<ul style="list-style-type: none"> <li>Develop indicators to track progress in implementation of policies, projects, plans etc and evaluate impact</li> </ul>	1
		<ul style="list-style-type: none"> <li>Develop participatory approach in monitoring of coastal and marine ecosystem</li> </ul>	1
		<ul style="list-style-type: none"> <li>Improve transparency of CBI Projects which utilize public coastal and marine resources</li> </ul>	2

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	<b>Transparency &amp; Accountability</b>	• Make public all lease, licenses, permits, quotas, concessions granted for coastal and marine resource use/development	2
		• Develop indicators to track progress in implementation of Freedom of Information Act	
		• Develop regional oversight mechanism for public authorities	
		• Develop framework for engagement of CBI developers/business operators with local MPAs for conservation and preservation actions in Marine Protected Areas.	1
	<b>Stakeholder Capacity and actions</b>	• Correct public policy failures which limit stakeholder action in development planning and decision-making process	3
		• Create program of action to build capacity for stakeholder action in Kalinago Territory	1
		• Develop national environmental education strategy for all levels of decision-makers	2
		• A well-funded and comprehensive communications strategy should be developed that engages all stakeholders, and utilizes diverse media outlets (e.g., web, public lectures, and stakeholder meetings) to reach the public.	1
		• Develop capacity development program action for all communities and MPAs engaged in EbA	1

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### Recommendations for Implementation, Monitoring and Compliance

Sub-Component		RECOMMENDATIONS FOR ACTION	PRIORITY
<b>COMPONENT THREE IMPLEMENTATION, MONITORING AND COMPLIANCE</b>	<b>Administration of coastal and marine resources</b>	<ul style="list-style-type: none"> <li>• Improve capacity of ministries and MPAs charged with responsibility for management of coastal and marine resources (human, technical, financial)</li> </ul>	1
		<ul style="list-style-type: none"> <li>• Develop participatory approach for monitoring of coastal and marine ecosystems</li> </ul>	1
		<ul style="list-style-type: none"> <li>• Publish state of the environment reports (annual)</li> </ul>	1
		<ul style="list-style-type: none"> <li>• (see list of environmental issues requiring action)</li> </ul>	
		<ul style="list-style-type: none"> <li>• Indicators and benchmarks for tracking environmental quality must be developed</li> </ul>	1
		<ul style="list-style-type: none"> <li>• Develop indicators to track progress in implementation of policies, projects, plans, etc and to evaluate impacts</li> </ul>	1
		<ul style="list-style-type: none"> <li>• Develop data collection and management systems</li> </ul>	1
		<ul style="list-style-type: none"> <li>• Training and capacity building of fisheries staff in news and developing technologies</li> </ul>	1
		<ul style="list-style-type: none"> <li>• Coral reef and fish stock monitoring</li> </ul>	1
	<b>Law enforcement</b>	<ul style="list-style-type: none"> <li>• Improve capacity of judiciary for enforcement of laws and regulations</li> </ul>	3
		<ul style="list-style-type: none"> <li>• Develop incentives for public participation in enforcement</li> </ul>	3
		<ul style="list-style-type: none"> <li>• Develop financial and tax incentives for voluntary compliance</li> </ul>	2
		<ul style="list-style-type: none"> <li>• Make provision for MPAs, NGOs and CSOs engaged in environment conservation and preservation to place fines, penalties and other enforcement measures</li> </ul>	2
	<b>Administration of land tenure and property rights</b>	<ul style="list-style-type: none"> <li>• Develop regional environmental commission, tribunal or court</li> </ul>	3
		<ul style="list-style-type: none"> <li>• Improve access to judiciary; educate citizens on rights and process for judicial intervention in resolving conflicts</li> </ul>	2
		<ul style="list-style-type: none"> <li>• Kalinago Council - Develop land and property administration system for Territory</li> </ul>	2
	<b>Cooperation and coordination</b>	<ul style="list-style-type: none"> <li>• Develop regional environmental protection and management authority</li> </ul>	3
		<ul style="list-style-type: none"> <li>• Develop standing committee, Citizen Development Commissions (CDC) for CMSP</li> </ul>	1
		<ul style="list-style-type: none"> <li>• Institutionalize roles and responsibilities of regional coordinating agencies</li> </ul>	2
		<ul style="list-style-type: none"> <li>• Formalize arrangements between CDC and regulatory entities</li> </ul>	1
	<b>Measures to address corruption</b>	<ul style="list-style-type: none"> <li>• Develop regional oversight mechanism for combating corruption</li> </ul>	3

## FINAL Regional Political Economy, Gap Analysis and Priority Selection: REGIONAL SESA FOR OECS CROP

### ANNEX II: GRENADA – Priority Selection

Recommendations– Policy, Legal, Institutional and Regulatory Framework

Sub-Components		RECOMMENDATIONS FOR ACTION	PRIORITY
	<b>Laws, policies and strategies related to coastal and marine management</b>	• Enact Environmental management Act and supporting regulations	1
		• Enact Regulations for Physical Planning Act to include regulations for EIAs	1
		• Adopt international MEAs into domestic legislation	2
		• Revise Forestry and Fisheries Legislation to include coastal zone management	Done
		• Revise and update Beach Protection Act to include coastal erosion and sea level rise	2
		• Develop National Ocean Governance Policy	1
	<b>Legal framework to support and protect land tenure, ownership and use rights</b>	• Develop legal framework for user rights of public lands, forests, beaches, mangroves, coastal and marine spaces	2
		• Revise user rights and fee structures for national parks and protected areas	1
	<b>Integration of Development Policies with CMSP</b>	• National Physical Development Plans integrate Climate Change Adaptation Plans	Done
		• Tourism Master Plan integrate climate change and sea level rise	1
		• Forestry Policy and Action Plans; include mangroves and protection of coastal wetlands	2
		• Housing Policy and Settlement Plan integrate into CMSP	2
		• Multi-hazard risk assessment	1
		• Develop linkages with national development plans and poverty reduction strategies	1
	<b>Institutional Framework</b>	• Develop institutional framework to protect traditional resource rights for sustainable livelihoods of vulnerable and marginalized communities	2
		• Protect right of public access to the seashore and marine resources in CMSP	1

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	<b>Financial Incentives, Economic Instruments and Benefits sharing</b>	• Revise tax regime and concessions for fishing and tourism sectors to correct distortions which contribute to environmental degradation	2
		• Introduce structured license fees for commercial fisherfolk and tourist sport fishing	2
		• Develop quota system for extraction of natural resources for all users (private and commercial)	1
		• Develop regime of economic instruments for resource management	2

## FINAL Regional Political Economy, Gap Analysis and Priority Selection: REGIONAL SESA FOR OECS CROP

### Recommendations for Planning and Decision-making process

Sub-Component		RECOMMENDATIONS FOR ACTION	PRIORITY
COMPONENT TWO PLANNING AND DECISION MAKING PROCESS	Planning Context and Levels of Planning	<ul style="list-style-type: none"> <li>Update Socio-economic development plans to include projects and actions for reduction of environmental pressures which lead to environmental degradation (see table 3.4 for areas for action)</li> </ul>	3
		<ul style="list-style-type: none"> <li>Conduct training in use of economic valuation, environmental assessments, hazard risk assessment and climate change scenarios to evaluate Public Sector Investment Projects</li> </ul>	3
		<ul style="list-style-type: none"> <li>Update Sectoral development plans to include provisions for protection of coastal and marine resources as appropriate</li> </ul>	3
		<ul style="list-style-type: none"> <li>Promote integrated development planning</li> </ul>	3
	Planning Process & Decision Support Systems	<ul style="list-style-type: none"> <li>Improve participation of Private sector and citizens in the planning and decision-making process across all levels of planning</li> </ul>	2
		<ul style="list-style-type: none"> <li>Operationalize ecosystems-based approach in coastal and marine spatial planning process</li> </ul>	1
		<ul style="list-style-type: none"> <li>Develop decision support systems and integrate hazard risk and environmental analyses into the decision-making process</li> </ul>	1
	Public Participation	<ul style="list-style-type: none"> <li>Institutionalize public participation; include standing citizen advisory groups in setting priorities for development plans</li> </ul>	1
		<ul style="list-style-type: none"> <li>Enforce Freedom of Information Act</li> </ul>	2
		<ul style="list-style-type: none"> <li>Develop guidelines for public participation in environmental and social impact assessments; make stakeholder consultations for EIAs a mandatory requirement</li> </ul>	1
		<ul style="list-style-type: none"> <li>Adopt principles and provisions of Regional Agreement on right to access to information public participation and environmental justice into national legislation</li> </ul>	2
		<ul style="list-style-type: none"> <li>Develop indicators to track progress in implementation of policies, projects, plans etc and evaluate impact</li> </ul>	1
	Transparency & Accountability	<ul style="list-style-type: none"> <li>Improve transparency of CBI Projects which utilize public coastal and marine resources</li> </ul>	2
		<ul style="list-style-type: none"> <li>Make public all lease, licenses, permits, quotas, concessions granted for coastal and marine resource use/development</li> </ul>	2
		<ul style="list-style-type: none"> <li>Develop indicators to track progress in implementation of Freedom of Information Act</li> </ul>	2

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		• Develop regional oversight mechanism for public authorities	
	<b>Stakeholder Capacity and actions</b>	• Correct public policy failures which limit stakeholder action in development planning and decision-making process	3
		• Create program of action to build capacity for stakeholder action in Kalinago Territory	2
		• Develop national environmental education strategy for all levels of decision-makers	1
		• A well-funded and comprehensive communications strategy should be developed that engages all stakeholders, and utilizes diverse media outlets (e.g., web, public lectures, and stakeholder meetings) to reach the public.	1

## FINAL Regional Political Economy, Gap Analysis and Priority Selection: REGIONAL SESA FOR OECS CROP

### Recommendations for Implementation, Monitoring and Compliance

Sub-Component		RECOMMENDATIONS FOR ACTION	PRIORITY
COMPONENT THREE IMPLEMENTATION, MONITORING AND COMPLIANCE	Administration of coastal and marine resources	• Improve capacity of ministries charged with responsibility for management of coastal and marine resources (human, technical, financial)	1
		• Develop participatory approach for monitoring of coastal and marine ecosystems	Done
		• Publish state of the environment reports	2
		• Indicators and benchmarks for tracking environmental quality must be developed	2
	Law enforcement	• Improve capacity of judiciary for enforcement of laws and regulations	1
		• Develop incentives for public participation in enforcement	1
		• Develop financial and tax incentives for voluntary compliance	1
	Administration of land tenure and property rights	• Develop regional environmental commission, tribunal or court	3
		• Improve access to judiciary; educate citizens on rights and process for judicial intervention in resolving conflicts	1
	Cooperation and coordination	• Develop regional environmental protection and management authority	3
		• Develop standing committee, citizen development commissions for CMSP	1
		• Institutionalize roles and responsibilities of regional coordinating agencies	2
	Measures to address corruption	• Develop regional oversight mechanism for combating corruption	3

## FINAL Regional Political Economy, Gap Analysis and Priority Selection: REGIONAL SESA FOR OECS CROP

### ANNEX III: ST LUCIA – Priority Selection

Recommendations– Policy, Legal, Institutional and Regulatory Framework

Sub-Components		RECOMMENDATIONS FOR ACTION	PRIORITY
	<b>Laws, policies and strategies related to coastal and marine management</b>	• Enact Regulations for Physical Planning Act to include regulations for EIAs	1
		• Adopt international MEAs into domestic legislation	2
		• Revise Forestry and Fisheries Legislation to include coastal zone management	1
		• Revise and update Beach Protection Act to include coastal erosion and sea level rise	2
		• Develop National Ocean Governance Policy	1
	<b>Legal framework to support and protect land tenure, ownership and use rights</b>	• Develop legal framework for user rights of public lands, forests, beaches, mangroves, coastal and marine spaces	2
		• Revise user rights and fee structures for national parks and protected areas	1
	<b>Integration of Development Policies with CMSP</b>	• National Physical Development Plans integrate Climate Change Adaptation Plans	2
		• Tourism Master Plan integrate climate change and sea level rise	1
		• Forestry Policy and Action Plans; include mangroves and protection of coastal wetlands	2
		• Housing Policy and Settlement Plan integrate into CMSP	2
		• Multi-hazard risk assessment	1
		• Develop linkages with national development plans and poverty reduction strategies	1
	<b>Institutional Framework</b>	• Develop institutional framework to protect traditional resource rights for sustainable livelihoods of vulnerable and marginalized communities	
		• Protect right of public access to the seashore and marine resources in CMSP	1
		• Revise tax regime and concessions for fishing and tourism sectors to correct distortions which contribute to environmental degradation	2

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	<b>Financial Incentives, Economic Instruments and Benefits sharing</b>	• Introduce structured license fees for commercial fisherfolk and tourist sport fishing	2
		• Develop quota system for extraction of natural resources for all users (private and commercial)	2
		• Develop regime of economic instruments for resource management	2

## FINAL Regional Political Economy, Gap Analysis and Priority Selection: REGIONAL SESA FOR OECS CROP

### Recommendations for Planning and Decision-making process

Sub-Component		RECOMMENDATIONS FOR ACTION	PRIORITY
COMPONENT TWO PLANNING AND DECISION MAKING PROCESS	Planning Context and Levels of Planning	<ul style="list-style-type: none"> <li>Update Socio-economic development plans to include projects and actions for reduction of environmental pressures which lead to environmental degradation (see table 3.4 for areas for action)</li> </ul>	1
		<ul style="list-style-type: none"> <li>Conduct training in use of economic valuation, environmental assessments, hazard risk assessment and climate change scenarios to evaluate Public Sector Investment Projects</li> </ul>	3
		<ul style="list-style-type: none"> <li>Update Sectoral development plans to include provisions for protection of coastal and marine resources as appropriate</li> </ul>	3
		<ul style="list-style-type: none"> <li>Promote integrated development planning</li> </ul>	3
	Planning Process & Decision Support Systems	<ul style="list-style-type: none"> <li>Improve participation of Private sector and citizens in the planning and decision-making process across all levels of planning</li> </ul>	1
		<ul style="list-style-type: none"> <li>Operationalize ecosystems-based approach in coastal and marine spatial planning process</li> </ul>	1
		<ul style="list-style-type: none"> <li>Develop decision support systems and integrate hazard risk and environmental analyses into the decision-making process</li> </ul>	1
	Public Participation	<ul style="list-style-type: none"> <li>Institutionalize public participation; include standing citizen advisory groups in setting priorities for development plans</li> </ul>	1
		<ul style="list-style-type: none"> <li>Enforce Freedom of Information Act</li> </ul>	2
		<ul style="list-style-type: none"> <li>Develop guidelines for public participation in environmental and social impact assessments; make stakeholder consultations for EIAs a mandatory requirement</li> </ul>	1
		<ul style="list-style-type: none"> <li>Adopt principles and provisions of Regional Agreement on right to access to information public participation and environmental justice into national legislation</li> </ul>	2
		<ul style="list-style-type: none"> <li>Develop indicators to track progress in implementation of policies, projects, plans etc and evaluate impact</li> </ul>	1
	Transparency & Accountability	<ul style="list-style-type: none"> <li>Improve transparency of CBI Projects which utilize public coastal and marine resources</li> </ul>	2
		<ul style="list-style-type: none"> <li>Make public all lease, licenses, permits, quotas, concessions granted for coastal and marine resource use/development</li> </ul>	2
		<ul style="list-style-type: none"> <li>Develop indicators to track progress in implementation of Freedom of Information Act</li> </ul>	

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		<ul style="list-style-type: none"> <li>• Develop regional oversight mechanism for public authorities</li> </ul>	
	<b>Stakeholder Capacity and actions</b>	<ul style="list-style-type: none"> <li>• Correct public policy failures which limit stakeholder action in development planning and decision-making process</li> </ul>	3
		<ul style="list-style-type: none"> <li>• Develop national environmental education strategy for all levels of decision-makers</li> </ul>	2
		<ul style="list-style-type: none"> <li>• A well-funded and comprehensive communications strategy should be developed that engages all stakeholders, and utilizes diverse media outlets (e.g., web, public lectures, and stakeholder meetings) to reach the public.</li> </ul>	1

## FINAL Regional Political Economy, Gap Analysis and Priority Selection: REGIONAL SESA FOR OECS CROP

### Recommendations for Implementation, Monitoring and Compliance

Sub-Component		RECOMMENDATIONS FOR ACTION	PRIORITY
COMPONENT THREE IMPLEMENTATION, MONITORING AND COMPLIANCE	Administration of coastal and marine resources	• Improve capacity of ministries charged with responsibility for management of coastal and marine resources (human, technical, financial)	1
		• Develop participatory approach for monitoring of coastal and marine ecosystems	1
		• Publish state of the environment reports (annual; conducted in 2006 & 2015)	1
		• (see list of environmental issues requiring action)	
		• Indicators and benchmarks for tracking environmental quality must be developed	1
	Law enforcement	• Improve capacity of judiciary for enforcement of laws and regulations	3
		• Develop incentives for public participation in enforcement	3
		• Develop financial and tax incentives for voluntary compliance	2
	Administration of land tenure and property rights	• Develop regional environmental commission, tribunal or court	3
		• Improve access to judiciary; educate citizens on rights and process for judicial intervention in resolving conflicts	2
	Cooperation and coordination	• Develop regional environmental protection and management authority	3
		• Develop standing committee, citizen development commissions for CMSP	1
		• Institutionalize roles and responsibilities of regional coordinating agencies	2
	Measures to address corruption	• Develop regional oversight mechanism for combating corruption	3

## FINAL Regional Political Economy, Gap Analysis and Priority Selection: REGIONAL SESA FOR OECS CROP

### Recommendations for addressing environmental pressures

Coastal Zone	Key Issues and Challenges	Recommendations for Action/Strategic Objectives	Priority
<b>Terrestrial Zone – upper catchment</b>	<ul style="list-style-type: none"> <li>Protected areas</li> <li>Deforestation</li> <li>Natural Hazards                             <ul style="list-style-type: none"> <li>-Bush fires</li> <li>-Landslides</li> <li>-Wild pigs</li> </ul> </li> <li>Erosion and pollution due to land clearing for Agricultural production</li> <li>Invasive Species</li> <li>Climate Change</li> <li>Decrease water levels in watershed areas (damming of water above watershed)</li> <li>Settlements along watershed</li> </ul>	<ul style="list-style-type: none"> <li>Watershed management plans for all major watersheds (ridge to reef)</li> <li>Habitat Survey and Assessment (Forestry)</li> <li>Permanent Sample plots (Forestry)</li> <li>Habitat mapping</li> <li>River stream flow assessment</li> <li>Develop stream/surface water quality standards</li> <li>Establish silviculture practices, conservation buffer zones for watershed development</li> <li>Improve/develop climate data collection and management system</li> <li>Integrate future climate/environment scenarios in management plans and policies</li> </ul>	<p><b>2</b></p> <p><b>1</b></p> <p><b>3</b></p> <p><b>2</b></p> <p><b>1</b></p> <p><b>2</b></p> <p><b>3</b></p> <p><b>2</b></p> <p><b>2</b></p>
<b>Terrestrial Zone</b>	<ul style="list-style-type: none"> <li>Quarrying</li> <li>Slash and burn agriculture</li> <li>Commercial and residential development</li> <li>Pig farms</li> <li>Infrastructural development (roads, utilities)</li> <li>Liquid and solid waste pollution ( agriculture, factory industries, etc)</li> </ul>	<ul style="list-style-type: none"> <li>Develop regulations, codes of best practice for each sector</li> <li>Ban on burning steep slopes, dry forests and sensitive areas</li> <li>EIAs, Land Development Code; Land Use Policy</li> <li>Waste water discharge standards and permits for industries</li> <li>Future planning, space allocation for municipal facilities (landfills; wastewater treatment plants)</li> </ul>	<p><b>2</b></p> <p><b>2</b></p> <p><b>1</b></p> <p><b>1</b></p> <p><b>2</b></p> <p><b>2</b></p>

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<b>Coastal zone (immediate land sea interface)</b>	<ul style="list-style-type: none"> <li>• Coastal communities</li> <li>• Urban developments</li> <li>• Infrastructure</li> <li>• High density of human activities</li> <li>• Solid waste disposal</li> <li>• Waste water management</li> <li>• Protected areas (conflict with private land ownership)</li> <li>• Agricultural activities</li> <li>• Sand mining</li> <li>• Storm surges</li> <li>• Climate change</li> <li>• Local communities lack proper sanitary facilities</li> </ul>	<ul style="list-style-type: none"> <li>• Develop regulations, codes of best practice for each sector</li> <li>• Ban on burning steep slopes, dry forests and sensitive areas</li> <li>• EIAs, Land Development Code; Land Use Policy</li> <li>• Waste water discharge standards and permits for industries</li> <li>• Future planning, space allocation for municipal facilities (landfills; wastewater treatment plants)</li> <li>• Integrate housing policies and plans into coastal master plans;</li> <li>• Allocate space for cemeteries, parks,</li> <li>• Allocate space for storage of fishing vessels during storm surges, hurricanes;</li> <li>• Plan for Tsunamis</li> </ul>	<p>2</p> <p>2</p> <p>1</p> <p>2</p> <p>2</p> <p>2</p> <p>2</p> <p>1</p> <p>1</p>
<b>3 nautical miles</b>	<ul style="list-style-type: none"> <li>• Solid and liquid waste management</li> <li>• Yachts, ships and marina (no holding tanks, anchoring damage to seabed)</li> <li>• Ballast water exchange</li> <li>• Marine invasive species</li> <li>• Heavy sedimentation</li> <li>• Climate change</li> <li>• Marine biodiversity destruction</li> <li>• Super structural development (marinas, jetties, waterbased type accommodations)</li> </ul>	<ul style="list-style-type: none"> <li>• Improve disposal and treatment facilities for accepting marine wastes</li> <li>• Monitoring and enforcement of IMO codes of best practice for marinas and boatyards</li> <li>• Monitoring of sea level rise (mean high tide gauges)</li> <li>• Improve watershed management;</li> <li>• Create stormwater retention and detention systems as feature in landscape as part of CMSP</li> </ul>	<p>2</p> <p>2</p> <p>2</p> <p>2</p> <p>2</p> <p>3</p>

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<b>Territorial Boundary</b>	<ul style="list-style-type: none"> <li>• Oil spills</li> <li>• Liquid and solid waste disposal</li> <li>• IUU Fishing</li> <li>• Tourism water based activities (pollution-exhaust fumes)</li> <li>• Waste water management</li> <li>• Climate change (increase SST, Coral bleaching)</li> <li>• Ballast water exchange</li> </ul>	<ul style="list-style-type: none"> <li>• Strengthen national oil spill response capability (public/private partnership)</li> <li>• Create regional oil spill response mechanism</li> <li>• Improve landside disposal and treatment facilities for accepting marine wastes</li> <li>• Monitoring and enforcement of IMO codes of best practice for marinas and boatyards</li> <li>• Monitoring of sea level rise (mean high tide gauges)</li> <li>• Regional coral reef monitoring program</li> <li>• Fish stock and marine resource assessment</li> <li>• zone marine tourism activities; develop codes and best practices</li> </ul>	<p><b>3</b></p> <p><b>2</b></p> <p><b>2</b></p> <p><b>2</b></p> <p><b>2</b></p> <p><b>2</b></p> <p><b>2</b></p> <p><b>3</b></p>
<b>EEZ</b>	<ul style="list-style-type: none"> <li>• Oil spills</li> <li>• Liquid and solid waste disposal</li> <li>• IUU Fishing</li> <li>• Tourism water based activities (pollution-exhaust fumes)</li> <li>• Waste water management</li> <li>• Climate change (increase SST, Coral bleaching)</li> </ul>	<ul style="list-style-type: none"> <li>• Strengthen national oil spill response capability (public/private partnership)</li> <li>• Create regional oil spill response mechanism</li> <li>• Improve land side disposal and treatment facilities for accepting marine wastes</li> <li>• Monitoring and enforcement of IMO codes of best practice for marinas and boatyards</li> <li>• Monitoring of sea level rise (mean high tide gauges)</li> <li>• zone marine tourism activities; develop codes and best practices</li> </ul>	<p><b>2</b></p> <p><b>2</b></p> <p><b>2</b></p> <p><b>2</b></p> <p><b>3</b></p> <p><b>3</b></p>

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