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CARIBBEAN OPEN TRADE SUPPORT (COTS)

**A REVIEW OF THE DRAFT QUARRY CODE OF PRACTICE TO BE
IMPLEMENTED IN DOMINICA**

FINAL REPORT

14 December 2007

This publication was produced for review by the United States Agency for International Development. It was prepared by Chemonics International.

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Prepared for USAID/Caribbean
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The author's views expressed in this publication do not necessarily reflect the views of the United States Agency for International Development or the United States Government.

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OVERVIEW

The Caribbean Open Trade Support (COTS) program of USAID/Barbados is designed to facilitate the transition of selected Organization of Eastern Caribbean States member states to open trade, and to enable the countries to compete more successfully and be more sustainable in the global economy. To this end, COTS will implement a wide range of activities over a four-year period geared toward:

- 1) Enabling businesses to compete more effectively in the global economy
- 2) Enhancing public-private sector interaction and dialogue leading to improved public policy dialogue
- 3) Assisting government institutions and agencies to remove administrative barriers to growth of the private sector
- 4) Increasing the private sector's and the media's understanding of the challenges and opportunities of the new trading regimes
- 5) Increasing the region's resilience to natural disasters
- 6) Mitigating the impacts of human disturbance on ecosystems and improving the institutional framework for managing protected areas

The economic future of the Eastern Caribbean is intimately linked to the ability of the sub-region to protect its rich biodiversity endowment while allowing for sustainable use. COTS has joined forces with government, civil society, and private sector conservation activities to support biodiversity conservation and policy, to better understand the costs and economic benefits of in situ conservation, to identify and mitigate the impacts of human disturbance on ecosystems, to improve the institutional framework for managing protected areas and to develop economic activities compatible with conservation. In conformity with USAID Biodiversity Code, COTS strives to implement biodiversity conservation activities that are threats-based, site-specific, and that lead to explicit biodiversity actions and measurable improvement.

In terms of direct threats to marine biodiversity, the project has identified coastal zone management issues including quarrying, wastewater discharge and improper civil works that threaten critical marine habitats through sedimentation and nutrient discharge. Yet, the most significant threat appears to be coastal quarry operations. Because of heavy demand for construction material throughout the Caribbean, quarrying activity in Dominica has increased.

Until very recently, all the quarrying industries operated north of Roseau (capital city) on the west side of the island, between the communities of Coulibistrie and Colihaut. This area comprised one of the oldest and largest sites and has been in use for more than 30 years, with smaller sites around the island in use for a little over a decade. Last year, a new site came into operation south of Roseau in the community of Pointe-Michel. Recently, a new permit has been granted for a quarry in Coulibistrie for a site of approximately 200 acres.

Extraction of basaltic rock for construction gravel occurs most often in steep areas, adjacent to important surface water features, and nearly always within a kilometer of the coast itself where a very important fishery is located.

The quarry industry in Dominica has evolved so far in an unregulated (i.e., lack of enforcement) environment. However in recent years the tourism industry has become very concerned by the extent of the operations and the impact on the landscape of the “Nature Island.” Communities where the sites are located complain about respiratory problems and fishermen claim that their catches are declining. Concerned by the negative impact of the industry on marine biodiversity, COTS aims to work with the various administrations involved (Land Planning, Fisheries, Forestry and Environment), as well as with the quarries themselves to help navigate these concerns.

The Government of Dominica has signaled its intention to mitigate the impact of quarry operations on the natural environment and, as a result, has drafted a Quarry Code of Practice that is proposed to become the legal mechanism to drive environmental performance and compliance within the industry.

SECTION 1: DELIVERABLES

To support the Government of Dominica's efforts, COTS retained the services of the consultant during the period November 15-30, 2007 to (refer to Annex 1 –Statement of Work for the Consultant):

- (i) Research mining fess in Jamaica
- (ii) Revise the quarry code of practice
- (iii) Meet with all the collaborating agencies to be involved in the monitoring of the code, and
- (iv) Make recommendations to make the mission a success

This report is a follow-up to the earlier mission during September 2007, when a workshop was held to sensitize collaborating agencies in monitoring the code and making recommendation for enhancing the code. As stated in an earlier report prepared by this consultant entitled “An Approach to Guide Environmental Management Practices (ISO 14001) Within The Quarry Industry,” the development and proposed adoption of a Quarry Code of Practice should be applauded, but pivotal to its implementation success is the regulatory framework, institutional capacity and established standards.

Quarry Code of Practice

The approach and methodology used throughout this review process included literature reviews, consultations with Kevin Rolle, Head of the Physical Planning Division, Minister Austrie, Lucien Blackmoore (Chief Technical Officer of the Ministry of Housing Lands and Telecoms), Tara Leevy (the Attorney General Department), and Lloyd Pascal (Director of Environmental Coordinating Unit). The opinions stated are mainly presented with a view of strengthening the proposed code of practice and in no way attempts to discredit the efforts of the agencies, individuals, and stakeholders who contributed to this document.

The Draft Quarry Code of Practice was reviewed against its stated goal and objective to ensure that the supply is managed in a sustainable way so the best balance is obtained between environmental, economic and social considerations. This is particularly relevant in Dominica given the government's economic thrust toward eco-tourism as a viable alternative to agriculture as the mainstay of the economy. In this context, the recently prepared Tourism Policy and Master Plan have both identified the currently unregulated and haphazard quarry industry as a significant threat to tourism development.

As stated in the consultant's previous report, there are three central issues that decision makers need to address if the code of practice is to come to fruition and successfully encourage improved environmental performance and compliance with regulatory requirements. The three central issues are:

- (i) Institutional capacity
- (ii) Regulatory framework
- (iii) Standards

Institutional Capacity

The quarry code of practice states that: “This code is being recommended as a Regulation under Section 8891 of the Physical Planning Act 2002.” This means that the Physical Planning Division, as stated above, will be charged with the authority or responsibility of monitoring and enforcing the quarry code of practice. The Physical Planning Division’s primary function is to control land use and development of lands. This means that the division has the requisite technical expertise to effectively and efficiently monitor and enforce breaches of improper land use and development of lands. The proposal for the Physical Planning Division to be the designated authority in monitoring and enforcing the code among quarry operations is self defeating, as the quarry code of practice is a response to the ongoing degradation of natural resources or environmental pollution.

The Physical Planning Division reviews and assesses all quarry applications since these developments fall under the ambit of the legal instruments that control the use of lands, the nature of the development, and the need for an Environmental Impact Assessment for new developments undertaken. The administrative and operational role and function of the Physical Planning Division as it pertains to land use control should not be confused with the monitoring and enforcement of environmental protection. For example, key environmental performance parameters, such as air and water quality data collection and interpretation and the development of environmental management plans, are not within the scope of the Physical Planning Division and are considered critical for the assessment of quarry operations (and other industries) if the desired objective is for the designated industry to operate in an environmentally sound manner.

Currently no central agency or department is responsible for protection and management of natural resources in Dominica. The code emphasizes the lack of authority and accountability as in some instances the code is to be administered and monitored jointly by Physical Planning Division and other collaborating agencies. The degree of overlap in relation to roles and responsibilities of agencies must be eliminated and, where appropriate, only agencies with the requisite technical expertise and resources should attend to monitoring of environmental parameters or standards outlined in the code. For example, Section 3.3 of the Draft Quarry Code of Practice suggests that the Environmental Health Department should be responsible for, among other things, pollution of both the marine and freshwater environments.

Consultations with the Environmental Coordinating Unit (ECU) showed there is a department with the requisite technical expertise to attend to environmental management and protection, but is not functional under Dominican law. The Environmental Coordinating Unit monitors aspects of the Dominican environment, but is limited by law to take legal action against entities that are non-compliant with environmental regulations/standards. Specifically, the Environmental Coordinating Unit administers all

environmental bilateral agreements on behalf of the Government of Dominica, such as the Climate Change, Montreal Protocol, CITIES, and Biodiversity.

The consultant was informed by Lloyd Pascal, Head of the Environmental Coordinating Unit that several attempts were made throughout the years to compile a list of all environmental legislation in Dominica, as well as propose that a central environmental agency be created. A complete list of Dominica's environmental regulations is presented in Annex 2.

It is the opinion of this consultant that an environmental agency be created to address the ongoing need of management and protection of Dominica's natural resources. It is recommended that the Environmental Coordinating Unit become the central environmental agency since it has the technical expertise and capabilities to carry out this function. The creation of a central environmental agency is further strengthened by the following:

- The global drive for protection natural resources, such as international conventions and agreements;
- The need for greater compliance with environmental regulations and standards;
- The monitoring of human-based activities that can significantly affect natural resources;
- The availability of the requisite technical expertise in the Environmental Coordinating Unit, Forestry Department, Fisheries, Physical Planning Division.

Furthermore, without the establishment of an environmental agency, industries (except the quarry industry) such as food factories, petrol service stations, and power generating plants are likely to go unmonitored and could have or is having a negative impact on Dominica's natural resources.

It is important to note that the formation of a central environmental agency can significantly enhance the enforcement and compliance of regulations since there will be a central authority for all human-based activities that affect environmental quality (i.e., pollution of rivers, sea and air, noise pollution, loss of biodiversity). The formation of this agency does not in the first instance require vast amounts of financial resources as the Government of Dominica has at its disposal all of the requisite technical expertise dispersed among its agencies (e.g., Fisheries, Forest, Physical Planning, Environmental Coordinating Unit).

There is no need to re-invent the wheel since there is within other Caribbean jurisdictions, such as Jamaica, a legal instrument (i.e., the Natural Conservation Authority Act 1991) to establish this environmental agency. This is particularly true when considering the appointment of a chief inspector who will have the authority to monitor quarry operations and enforce the acceptable standards outlined in the code. The creation of an environmental agency and merger of technical expertise under this new structure will provide the requisite skills sets (i.e., qualifications in natural science/biological

science/geology/hydrology) to carry out the desired function of the chief inspector in an integrated manner.

Finally, a needs assessment should be conducted against all environmental legislation, including the proposed code of practice to ensure that the requisite professional expertise is available and, if not, then training is undertaken to enhance available expertise.

Regulatory Framework

Consultations were held with Tara Leevy of the Attorney General Department to review the proposed code and practice with a view toward providing recommendations on how it may become a regulation of law and enforceable. Ms. Leevy pointed out that the code clearly states its purpose which is to document and promote safety and environmental guidelines for quarrying in Dominica. She noted that the code is very detailed and, as a result, is suitable for use as a code of practice. However, if the code were to form the basis of regulations, it would have to be altered significantly. She stated that while we could promulgate regulations as regards the quarrying industry, the aims and content of the regulations are likely to be different to that of the guidelines. Additionally, some of the areas covered by the Code might be outside the ambit of the Physical Planning Act. She cautioned against such a move as much of the detailed guidance contained in the Code could be lost in the process of redrafting the document as a set of regulations.

For example, the section that deals with approvals for quarry operations is a section that could be drafted as regulations under the Physical Planning Act, but an area such as rehabilitation might not be an easy fit under the Act.

An alternative regulatory framework to preserve the Code in its current form, as pointed out by Ms. Leevy is to enforce it as a schedule to the Physical Planning Act. This would give the result that we desire the ability to enforce without our having to alter the wording of the document.

This raises the question: can the Code be a schedule of another Act, such as a new Act for an environmental agency? The answer is a resounding yes, especially, if the new Act were to provide for the making of regulations with respect to the subject matter of the Code this would be fine. This recommendation is fundamental to establishment of a central or dedicated environmental agency as there are other policies, legislation and regulations that refer to the protection of the environment but are monitored and enforced by the specified agency or department.

This argument is worthy of consideration given the integrated approach and dynamics of the Code, and the environmental parameters to be monitored and enforced. Additionally, the overlapping nature of the Code and other legal instruments (e.g., Mines and Minerals Act) that refer to environmental protection requires that decision makers proceed with a legal review and seek to integrate all under one Act. This will reduce the potential for conflicts among government agencies and clearly identify roles and authority.

Legal Support

Notwithstanding, the need for clear lines of authority for agencies or departments to monitoring and enforcing regulations, there is another major concern that is the lack of legal support to proceed with the prosecution of an entity or individual that has is non-compliant with the law. This issue was first raised at the COTS workshop held on September 26, 2007 at the Garraway Hotel in Dominica to introduce the concept of environmental management systems (ISO 14001) as a mechanism to foster environmental compliance within the quarry industry.

“...the Government’s inability to prosecute quarry operators that breach the relevant regulations was echoed and shared by a number of the participants. The area of contention is the legal department (i.e., the Attorney General Chambers) inability to follow-up on cases presented for regulatory breaches. The participants were of the view that additional human resources (i.e., more lawyers) are required at the Attorney General to address the growing number of legal matters which are not being pursued vigorously. It’s the opinion of the consultant, similar to other jurisdictions such as Jamaica the Government may have to prioritise its efforts in terms of prosecution of cases, but alternatively look at making the necessary provisions to facilitate agencies such as Physical Planning Division and Fisheries to have a dedicated legal officer.” (COTS Report – An Approach to Guide Environmental Management Practices (ISO 14001) Within the Quarry Industry – Dominica)

It’s the opinion of the consultant, similar to other jurisdictions, such as Jamaica, the Government of Dominica may have to prioritize its efforts in terms of prosecution of cases, but alternatively look at making the necessary provisions to facilitate agencies such as the Physical Planning Division and the proposed central environmental agency to have a dedicated legal officer. It is very important that all established environmental laws and regulations are adhered to since failure to prosecute non-compliance will only lead to an unregulated atmosphere that may accelerate degradation of Dominica’s natural resources.

Standards

The Code makes reference to acceptable standards to be attained for environmental quality parameters such as noise, water and air quality. With the exception of noise and air quality, water quality standards are not clearly defined within the Code since there is no actual concentration for selected parameters (i.e., turbidity, total solids, dissolved solids, suspended solids, or temperature).

This implies that parameters need to be determined in terms of local conditions (i.e., existing/prevaling background/baseline parameter concentrations). For example, in the section on coastal and watershed protection, drainage and erosion control, the code makes reference to “water leaving the quarry premises should be treated to minimize sedimentation and turbidity problems.” There is no mention of an acceptable turbidity (i.e., total suspended solids (TSP) concentration to be attained for marine or freshwater environments. This raises questions as to whether or not other acceptable standards stated in the code can be attained by quarry operators; are they practical and achievable? This

situation can only be confirmed or denied by conducting the respective field surveys to collect data that will determine prevailing parameter concentrations — this should include seasonal variations.

Of significance is the fact that Environmental Health Department has oversight for regulations that may be applicable to quarry operations, such as draft regulations – air, soil and water pollution and nuisances. The existence of these regulations confirms the need for a comprehensive review of all environmental acts and regulations that pertain to the environment to ensure inclusion in the code and avoid duplication of efforts.

Acceptable standards quoted in the Draft Quarry Code of Practice must either be based on internationally or regionally recognized standards or existing (baseline) conditions in Dominica to ensure that natural resources are adequately protected (refer to Annex 3).

Mining Fees

A literature review of the Mines and Geology Division in Jamaica Mining Fees were reviewed to ascertain the amount charged to mining operations. All licenses to establish a mining operation attracts a license fee of US\$352 (exchange rate: J\$71 = US\$1) and three percent of market value of sales. This three percent tax is payable directly to the Mines and Geology Division and is separate from income tax to be paid by mining operators.

Efforts were made on November 22, 2007 to meet with officers at the Customs and Excise Division to ascertain how quarry industry exports are tracked and the fees charged. The consultant was unsuccessful in interviewing the division head and officer, but was provided a brief on how Customs monitors minerals exported by the quarry industry in Dominica. Minerals are classed as commercial merchandise and an entry is prepared by the exporter (i.e., quarry operator) and entered into the database by custom officers. Currently the fee that is applied to the exportation of sand EC\$987.60 per 2,000 tons and for stone EC\$889.00 per 2,000 tons.

There is a process in place to track and monitor the quantity of minerals exported by quarry operators. Also, there is a fee charged for the export of these minerals. Based on the information from the Customs and Excise Division and the concern of the minister responsible for seeing that fees are adjusted, it is the opinion of this consultant that a detailed review must be undertaken of the pricing mechanism for exporting minerals by the Ministry of Finance and Planning and in consultation with the Ministry of Land Housing and Telecommunications. The primary objective is to determine a rate or fee structure paid by the quarry operators who export minerals from Dominica, and to ensure that funds are available to the state to reduce or ameliorate environmental impacts that arise from quarry mining activities.

Recommendations

The recommendations below inform decision makers on the establishment of a central environmental agency, as well as the proposed course of action to implement the Quarry Code of Practice that aims to improve environmental performance and compliance of quarry operators in Dominica:

1. Implement and preserve the Code in its current form will require it to be enforced as a schedule to the Physical Planning Act or any Act that pertains to environmental protection. This will require an extensive review of environmental legislation to ensure that there are not potential conflicts in enacting the Code.
2. The Physical Planning Division's primary function is to control land use and development of lands, including reviewing quarry applications. This means that they have the requisite technical expertise to monitor and enforce breaches of improper land use and development of lands.

The administrative and operational role and function of the Physical Planning Division as it pertains to land use control should not be confused with the monitoring and enforcement of environmental protection. For example, key environmental performance parameters — noise, air, water quality data collection and interpretation, and the development of environmental management plans — are not within the scope of the Physical Planning Division, and are critical for the assessment of quarry operations (and other industries) if the desired objective is for the designated industry to operate in an environmental sound manner.

The proposal for the Physical Planning Division to be the designated authority in monitoring and enforcing the Code must be carefully considered since they lack the technical capacity to execute this action and a more appropriate agency or department be identified or created to enforce the Code.

It is recommended that the proposed chief inspector be assigned to the Environmental Coordinating Unit or the proposed central environmental agency.

3. The diversity of Dominica's ecological and natural resources, and it being recognized as a premier eco-tourism destination highlights the need or the time for developing a central environmental agency.

Dominica was officially ranked as the top sustainable island in the Caribbean and among the top 10 in the world by National Geographic Traveler. Dominica continues to be recognized for its attributes and sustainable tourism efforts, including being the first country in the world to receive Benchmarking designation from the prestigious eco-tourism organization Green Globe 21 and ranking as the only Caribbean destination in the top five happiest countries on earth in the Happy Planet Index (compiled by Britain's New Economics Foundation).

The formation of an environmental agency will signal to the international community and the stakeholders of Dominica the Government's intention to preserve its resources and protect its people from potential environmental impacts associated with development. The central environmental agency can significantly enhance enforcement and compliance with regulations since there will be a

central authority responsible for all human-based activities that affect environmental quality (i.e., pollution of rivers, sea and air, noise pollution, loss of biodiversity).

There is no need to re-invent the wheel in the formation of such an agency since there is a legal instrument such as the Natural Conservation Authority Act 1991 within other Caribbean jurisdictions, as in Jamaica for example. This Act provides the environmental authority with the power to protect and manage Jamaica's natural resources.

It is recommended that the Environmental Coordinating Unit become the central environmental agency since it has the technical expertise and capabilities to carryout this function.

4. Additional legal support is required to assist agencies in protecting Dominica's resources by prosecuting offenders. The Government of Dominica will have to prioritize cases to prosecute, but alternatively look at making provisions to assisting these agencies and the proposed central environmental agency in obtaining a dedicated legal officer. It is very important that all established environmental laws and regulations are adhered to since failure to prosecute non-compliance will lead to an unregulated atmosphere that may accelerate degradation of Dominica's natural resources.
5. Environmental quality standards — noise, water, and air quality — highlighted in the Code must relate to local conditions — existing/prevaling background/baseline parameter concentrations. As an interim solution to where applicable internationally or regionally recognized standards should be adopted until baseline data has been collected, including seasonal variations.
6. A detailed review of the pricing mechanism for exporting minerals must be undertaken by the Ministry of Finance and Planning and in consultation with the Ministry of Land Housing and Telecommunications. The primary objective here is to determine a rate or fee structure paid by the quarry operators who export minerals from Dominica, and ensure funds are available to the state to reduce or ameliorate the environmental impacts that arise from quarry mining activities.

ANNEXES

Annex 1 Statement of Work for the Consultant

1. Background:

The Caribbean Open Trade Support (COTS) program of USAID/Barbados facilitates the transition of selected Organization of Eastern Caribbean States member states to open trade, and to enable countries to compete more successfully and be more sustainable in the global economy.

To this end, COTS will implement a wide range of activities over a four-year period geared toward:

- 1) Enabling businesses to compete more effectively in the global economy;
- 2) Enhancing public-private sector interaction and dialogue leading to improved public policy dialogue;
- 3) Assisting government institutions and agencies to remove administrative barriers to the growth of the private sector;
- 4) Increasing the private sector's and the media's understanding of the challenges and opportunities of the new trading regimes;
- 5) Increasing the region's resilience to natural disasters; and
- 6) Mitigating the impacts of human disturbance of ecosystems and improving the institutional framework for managing protected areas.

2. Component:

The economic future of the Eastern Caribbean is intimately linked to the ability of the sub-region to protect its rich biodiversity endowment while allowing for sustainable use. COTS has joined forces with government, civil society, and private sector conservation, activities to support biodiversity conservation and policy, to better understand the costs and economic benefits of in situ conservation, to identify and mitigate the impacts of human disturbance of ecosystems, to improve the institutional framework for managing protected areas, and to develop economic activities compatible with conservation.

Conforming to the USAID Biodiversity Code, COTS strives to implement biodiversity conservation activities that are threats-based, are site-specific, lead to explicit biodiversity actions, and measurable improvement.

3. Objective and Tasks:

In terms of direct threats to marine biodiversity, the project has identified coastal zone management issues, — quarrying, wastewater discharge, and improper civil works — which threaten critical marine habitats through sedimentation and nutrient discharge. Yet, the most significant threat appears to be coastal quarry operations. Because of heavy demand for construction materials throughout the Caribbean, quarrying activity in Dominica is on the increase.

Until very recently, all the quarrying industries operated north of Roseau (capital city) on the west side of the island, between the communities of Coulibistrie and Colihaut. It comprised one of the oldest (and largest site) that has been in use for more than 30 years while smaller sites have been in use for a little over a decade. Last year, a new site came into operation south of Roseau in the community of Pointe-Michel. Very recently, a new usage permit has been granted for a new quarry in Coulibistrie for a site of approximately 200 acres.

Extraction of basaltic rock for construction gravel occurs most often in steep areas, adjacent to important surface water features, and nearly always within a kilometer of the coast itself where a very important fishery is located, fish being the outmost important source of animal protein for the population of Dominica.

The quarry industry in Dominica has evolved so far in a non-regulated environment. However, in recent years the tourism industry has become very concerned with the extent of the operations and the impact on the landscape of the “Nature Island.” Communities where the sites are located complain about respiratory problems and fishermen claim that their catches are declining. Concerned by the negative impact of the industry on marine biodiversity, COTS wishes to work with the various administrations involved (Land Planning, Fisheries, Forestry and Environment), as well as with the quarries themselves to help regulate the industry.

One way to proceed is to require that all operations be certified ISO 14001 and/or develop a Code for Quarries and /or other regulations. Support could be provided to individual quarries so they can upgrade their management system to the new standards.

Agreement was made with the Ministry of Housing, Lands, Telecommunications to provide the technical expertise to revise both the Draft Quarry Code of Practices and the fee structure used by the Government of Dominica.

More specifically the consultant is asked to:

- Research mining fees in Jamaica to make recommendations to the Government of Dominica;
- Revise the Quarry Code of Practice integrating a section on the marine environment;
- Meet with all the collaborating agencies to be involved in the monitoring of industries’ compliance and Code of Practice enforcement;
- Integrated concerns and issues raised by the Physical Planning Division and Minister in charge;
- Make recommendations as appropriate to make this mission a success.

4. Deliverables:

The Revised Quarry Code of Practice will include recommendations on a new fee structure by November 30, 2007.

5. Reporting:

While in Dominica, the contractor will report directly to the Biodiversity Component Leader, Suzie LeBlanc, or any successor appointed by Chief of Party Efrain Laureano. the component leader is responsible for monitoring contractor performance under this SOW.

6. Level of Effort:

Total level of effort available for this second mission is 13 days, including travel.

7. COTS Administrative Guidance

The Consultant shall not discuss contractual details, including budget terms and reimbursement procedures, with Chemonics unless directed to do so by PA.

Project Timesheets

All personnel working on COTS must complete a Chemonics timesheet. It must be signed by both the consultant and the COTS supervisor for this assignment, Suzie LeBlanc. The original timecard shall be submitted to Chemonics, with a copy provided to PA in support of the consultant's invoices.

Expense Reports/Invoices

Please submit as soon as possible, taking into account the following considerations:

- a) Receipts are required for all expenses except MI&E per diem. Please carry a receipt book with you in case your taxi driver does not have a receipt.
- b) All airline tickets submitted for reimbursed must be accompanied by the original boarding passes
- c) Please use adhesive tape (not staples) to present all receipts on blank sheets of paper. This prevents any of the receipts from being lost.
- d) Please match the expense item in your expense report/invoice to the receipt by numbering each.

In the event that PA's client, Chemonics, books and pays for travel within the region, the original ticket receipt and original boarding passes must be submitted to Chemonics' Project Accountant, Sheridith-Weston-Benta, promptly upon completion of travel.

Deadlines

There is a strong emphasis within the COTS project on deadlines. Please be sure to document via email to your team leader any reasons for not meeting a deadline and inform PA. Please also be sure to document any changes in work assignments and inform PA. Any significant conversations should be followed up with an email confirming what was discussed.

Annex 2 – List of Environmental Legislation in Dominica

- Development & Planning Corporation Act
- Town & Country Planning Act 1975
- Forest Act 1959
- Forest & Wild Life Act 1976
- Fisheries Act 1987
- National Parks and Protected Areas Act 1975
- Pesticide Control Act 1974
- Solid Waste Management Act 1997
- Plant Protection and Quarantine Act 1986
- Protection of Animals Act
- The Animal Diseases Act
- Mines and Minerals Act 1996
- Litter Act 1990
- Water and Sewerage Act 1989
- Receivers of Wreck Act 1885
- State Land Act 1960
- Environmental Health Services Act 1997
- Noxious and Dangerous Substances Act 1982
- Marine Pollution Management Act 2002
- The Montreal Protocol Regulations 2006
- Standards Act 1999