

May 11, 2012

Comments from the United Kingdom on the Strategic Program for Climate Resilience for Dominica

The proposal is strong on country ownership and has the advantage of having been given high political priority with its integration in the recently endorsed Low Carbon-Climate Resilient development strategy. The establishment of Caribbean Climate Change Adaptation standards for the private sector that can be integrated into environmental management systems is noteworthy. We are pleased to see that the investments incorporate a commitment to improved data capture and analysis (in particular geospatial) and sharing lessons (e.g. in country and with regional initiatives). This will be critical for the monitoring of progress and results.

Improvements we would like to see addressed in implementation phase include:

Cross cutting

Integration and synergies with regional track SPCR have also been taken into account. **However, further clarification on mechanisms for cooperation between national and regional track programmes and timing of linked activities is needed.**

The economic analysis of various components is worth mentioning and while it falls short of full analysis, provides an effective way to assess the options given data constraints. **It will be useful to review and build on the economic analysis during implementation.**

Baselines and output indicators as well as evaluation criteria will need further development as projects are developed.

Institutional coordination

It will be helpful to have a clearer understanding of the complementarity between the national Physical development plan, PPCR community mapping project and selection of beneficiaries of the Climate Change Trust fund- ensuring especially vulnerable communities are targeted.

Institutional capacity to implement is identified as a significant constraint. We support the proposal that the Environment, Climate Change and Development Bill is enacted prior to SPCR commencement, to demonstrate the Government of Dominica's commitment not only to the enabling framework to mainstream climate change into national planning processes, but also to adequate staffing of the Division of Environment, Climate Change and Development (DECCD) that is to be legally

established under the proposed bill. **However, further clarification of responsibilities and formal coordinating mechanisms (with other ministries, private sector and NGOS) of the DECCD as well as how reviews of progress will be conducted is needed.**

Coordination with other adaptation funding

The programme is ambitious and is reliant on a number of significant parallel investments being made (listed below). **It will be useful to get a better understanding of how this will occur and implications if they are not realised, or long in coming.**

Does Dominica plan to access the adaptation funds through a national agency still to be accredited or through existing multilateral or regional implementing agencies?

More details on feasibility and adequacy of level of financing for *Climate Change Trust Fund* would also be helpful – it is indicated in SPCR that this will be external to government revenue – with funds raised from market-based instruments that will not raise the local tax base (e.g. carbon levy on energy use – possibly use portion of Petro Caribe deferred payment scheme on fuels (2% interest) EC\$200 million accrued over 6 years with donors providing matching funds).

Coordination with other programmes

Points to note for PPCR focal point - both will be applicable to Component 2:

- A new Weather Risk Insurance Scheme (index based) for small farmers is under development in the Caribbean with UK support (starting with OECS banana farmers but expanding to others) as well as for micro finance borrowers (already piloted in Haiti – MICRO).
- The Climate Change risk atlas project for the tourism sector in Dominica - a CARIBSAVE regional programme initiative supported by UKAid and AusAid to better understand impacts of sea level rise and storm surge as well as community livelihood vulnerability. It includes more detailed analysis at local level for Portsmouth area (draft report now being circulated).