
Draft Stakeholder Engagement Plan

Tuvalu Maritime Investments in Climate Resilient Operations Phase 2

December 2021

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Acronyms

ADB	Asian Development Bank
AP	Affected People
CPMO	Central Project Management Office
DPO	Disabled Persons Organisation
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standard
GoTv	Government of Tuvalu
GRM	Grievance Redress Mechanism
IA	Implementing Agency
LMP	Labour Management Procedure
MHARD	Ministry of Home Affairs and Rural Development
MICRO	Maritime Investment in Climate Resilient Operations
MNR	Ministry of Natural Resources
MoF	Ministry of Finance
NGO	Non-governmental Organisation
PDO	Proposed Development Objectives
PM	Project Manager
PMU	Project Management Unit
PSC	Project Steering Committee
RPF	Resettlement Policy Framework
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
TANGO	Tuvalu Association of Non-governmental Organisations
TCAP	Tuvalu Coastal Adaptation Project
TNCW	Tuvalu National Council of Women
VAC	Violence Against Children
WB	World Bank

1 INTRODUCTION

1.1 Background

The Government of Tuvalu (GoTv) has requested additional support from the World Bank (WB) to develop a stronger, more resilient maritime sector and provide improved access to and from outer islands. The objective of the additional support is to improve the climate resilience of the Nanumaga, Nanumea and Nukufetau Harbours, and in the event of an Eligible Crisis or Emergency, to provide an immediate response to the Eligible Crisis or Emergency. The additional support will be provided through the Maritime Investments in Climate Resilient Operations 2 (MICRO 2).

The proposed development objective (PDO) of MICRO 2 is to improve the climate resilience of maritime infrastructure in Tuvalu. The project consists of (a) construction of 10m workboat harbours in three locations namely Nanumaga, Nanumea; and Nukufetau and (b) supporting infrastructure including construction and/or rehabilitation of road access; reef channels, breakwaters, jetties, small wharves, concrete ramps, public buildings, terminals for passengers, warehousing/storage, and utilities (such as electricity, solar panels, and water systems).

This document is the Stakeholder Engagement Plan (SEP) for the Maritime Investments in Climate Resilient Operations Phase 2 (MICRO 2). This SEP describes the planned stakeholder engagements and consultation process to be implemented and also forms part of the MICRO 2 Environmental and Social Impact Assessments (ESIA). The SEP is developed as required under WB Environmental and Social Standard (ESS) 10: Stakeholder Engagement and Information Disclosure.

MICRO 2 has been classified as Significant Risk under the WB Environmental and Social Framework (ESF) and a series of environmental and social risk management plans are required including ESIA, Resettlement Policy Framework (RPF), Labour Management Procedure (LMP) and this Stakeholder Engagement Plan (SEP). Due to the nature of the project, it is expected that the majority of the environmental and social impacts will be site specific, few if any are irreversible, and mitigation measures can be readily designed and implemented. The identification of potential environmental and social risks/impacts and appropriate mitigation measures or avoidance to be implemented during the construction phase.

The SEP is a living document so it should be reviewed and updated in line with the new activities, changes in the project design and newly identified stakeholders.

1.2 Purpose and Objective of the Stakeholder Engagement Plan

The SEP is an inclusive process conducted throughout the life cycle of the project. It seeks to define a technically and culturally appropriate approach to consultation and disclosure. It supports the development of strong, constructive and responsive relationships that are important for successful management of the project's environmental and social risks/impacts. Early and clear communication with key stakeholders often helps manages expectations and avoid risks, potential conflicts, and project delays.

In addition, the SEP assists to improve and facilitate decision making and create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner, and that these groups are provided sufficient opportunity to voice their opinions and concerns that may influence Project decisions.

Hence, this SEP provides a plan to interact effectively with MICRO 2 stakeholders to support projects interests.

The key objectives of the SEP can be summarised as follows:

- Identification stakeholders that are affected, and/or able to influence the Project and its activities.
- Planning engagement modalities and effective communication methods, timing and structures to share project information, and to ensure regular, accessible, transparent and appropriate consultations and disclosure in such a way that it meets the international best practice standards.
- Enabling platforms for stakeholders' engagement the opportunity to influence project planning and design decisions.
- Define roles and responsibilities for the implementation of the SEP.
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.
- Establish formal grievance/resolution mechanisms (GRM).

1.3 Scope and Structure of the SEP

This document is a general SEP with general guidance on how to involve the public in all phases of the project, and their approval to their implementation.

Scope of the SEP shall be as outlined in the World Bank's Environmental and Social Standard (ESS) 10. The engagement will be planned as an integral part of the project's environmental and social assessment and project design and implementation.

The Stakeholder Engagement Plan consist of the following sections: (i) Project Description; (ii) Description of the Administrative, Policy and Regulatory Framework (iii) Previous Stakeholder Engagement Activities; (iv) Stakeholder Identification and Analysis; (v) Stakeholder Engagement Program; (vi) Resources and Responsibilities for implementing the SEP; (vii) Grievance Redress Mechanism and (ix) Monitoring and Reporting.

2 OVERVIEW OF THE STAKEHOLDER ENGAGEMENT

2.1 What is Stakeholder Engagement

Stakeholder Engagement will be free of manipulation, interference, coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format. It involves interactions between identified groups of people and provides stakeholders with an opportunity to raise their concerns and opinions and ensures that this information is taken into consideration when making project decisions.

2.2 Principles for Effective Stakeholder Engagement

Stakeholder engagement is usually informed by a set of principles defining core values underpinning interactions with stakeholders. Common principles based on international best practice include the following:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s) early in the process.
- Providing information in advance of consultation activities is conducted in a manner that fosters mutual respect and trust.
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate.
- Respect for traditions, language, rights, cultural beliefs, values, timeframes and interest of stakeholders and affected communities are recognized and addressed.
- Inclusiveness in representation of views, including people from different age groups, sex, gender, vulnerability and or/minority groups are encouraged and supported by appropriate participation opportunities; and
- Processes free information of intimidation or coercion or incentivisation.
- Clear mechanisms for responding to peoples concerns, suggestions and grievances.
- Incorporating where appropriate and feasible, feedback into the project or subproject design and reporting back to stakeholders; and
- Transparency is demonstrated when community concerns are responded to in a timely, open and effective manner.

3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

In order to develop an effective SEP, it is necessary to determine who the stakeholders are and understand their needs and expectations for engagement, and their priorities and objectives in relation to the Project. This information is then used to tailor engagement to each type of stakeholder. As part of this process, it is particularly important to identify individuals and groups who may find it more difficult to participate and those who may be differentially or disproportionately affected by the project because of their marginalized or vulnerable status.

It is also important to understand how each stakeholder may be affected – or perceives they may be affected – so that engagement can be tailored to inform them and understand their views and concerns in an appropriate manner.

In general, engagement will be directly proportional to impact and influence, and as the extent of impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increase, engagement with that particular stakeholder group should intensify and deepen in terms of the frequency and the intensity of the engagement method used. All engagement should proceed on the basis of what are culturally acceptable and appropriate methods for each of the different stakeholder groups targeted.

3.1 Identification of stakeholders

A stakeholder is defined as a person or group who has an interest in a particular decision or activity relating to MICRO 2, either as an individual or as a representative of a group. This includes people who can influence a decision, or can influence actions, as well as those affected by it.

For the MICRO 2, stakeholder groups include island communities and national government authorities. Stakeholders for the subprojects (Nanumaga, Nanumea and Nukufetau) have been and will continue to be identified on a continuing basis by:

- Identifying the various categories of parties who may be affected by or interested in the project; and
- Identifying specific individuals or organizations within each of these categories taking into account:
 - The expected area of influence of the project that is the geographic area over which it may cause impacts (both positive and negative) over its lifetime, and therefore the localities within which people and businesses could be affected.
 - The nature of the impacts that could arise and therefore, the types of government bodies, NGOs, academic and research institutes and other bodies who may have an interest in these issues.

There are other partnerships that are important for the implementation of the project and addressing groups or individuals with a particular interest in the project who must be recognised by the client to facilitate the project work is a requirement.

The World Bank ESS 10 recognizes the following categories of stakeholders:

- Project Affected parties
- Other interested parties

- Disadvantaged/ Vulnerable Individuals or Groups

3.2 Stakeholder Categories

3.2.1 National Government Authorities and Institutions

National authorities are defined as those agencies of the GoTv who have the power to regulate or influence the Project in terms of granting permits or other approvals for the project and monitoring and enforcing compliance with GoTv law throughout the project implementation cycle. It is continuing a productive dialogue with these national authorities throughout project implementation.

Ministry of Public Works, Infrastructure, Environment, Labour, Meteorology and Disaster

The MPWIELMD is responsible for the provision of strategic policy direction in infrastructure development and ensure implementation through effective translation into operational strategies and results-based management. The Ministry is also responsible for the formulation and implementation of environmental policies with the aim of ensuring ecologically sustainable development in Tuvalu. They will also oversee the environmental permitting assessment and approval process for the MICRO 2 Project. MPWIELMD will be the lead ministry and implementing agency for project communications under the MICRO 2 Project.

Ministry of Finance (MoF)

The Ministry of Finance is responsible for supporting the Government in pursuing a sound economic policy, enhance growth and productivity and ensure efficiency in the public sector. Through eight program areas, the Ministry provides fiscal discipline and balanced budget; is responsible for clear budget expenditure priorities that offer high rates of return, structural change, innovation and economic reform, increase private sector share of GDP, minimize external debt and lower subsidies to public enterprise. The MoF is the executing agency for the MICRO Project.

Ministry of Natural Resources (MNR)

The Ministry of Natural Resources is responsible for ensuring that sustainability is safeguarded in the Utilization of Tuvalu's natural resources through informed Government policies and public practices. Through three program areas, the Ministry has to maximize social and economic returns through the sustainable management and harvesting of all agricultural resources in Tuvalu; also, to maximize social and economic returns through the sustainable management and harvesting of marine resources; and to facilitate maximum land usage in Tuvalu by maintaining a systematic register of all available land resources. Any land issues under the MICRO Project will be managed through the Department of Lands and Survey which sits under the MNR.

Ministry of Local Government and Agriculture

The Ministry of Local Government and Agriculture is responsible for all economic and social policies as development, for the betterment of all Tuvaluans on each island. Through five program areas, the Ministry provides and ensures a distributive growth of Tuvalu's economy by providing policy direction and coordinating implementations; enhanced economic and social development in the outer islands through their Kaupule empowerment and community participants; promotes the social well-being for individuals; to facilitate, preserve and protection of valuable cultural heritage in Tuvalu through systematic recording and documentations; minimizing the negative effects of solid waste on Tuvalu's environment through prudent policy, legislation and sustainable systems. The Kaupule located on the three islands will be vital partners on the design, development, and implementation of the MICRO Project as well as other

government departments and service providers whose will be able to improve their service delivery with better connectivity.

Schools, and Health Clinics

There are educational institutions on all three islands

There is only one hospital in Tuvalu, the Princess Margaret Hospital in Funafuti. The health centers on the islands are a vital link and resource to the local community due to the remoteness of the islands from the main hospital on Funafuti.

3.2.2 Project Affected Communities and Individuals

This group will include all people who may be directly or indirectly affected by the MICRO 2 Project. It will include:

Community

- Communities located on the islands.
- Funafuti based community members of all three islands
- Users of any existing harbour facilities being upgraded such as fishermen and exporters of produce
- Users of land affected by project

Falekaupule

The Falekaupule on each island is the traditional assembly of elders and acts as the local government on each island. The Kaupule is the executive arm of the Falekaupule.

Landowners

There are three types of landowners who are considered to be affected by the project. These are: (i) the current owners of land which will be permanently leased by the GoTv for the harbour landside facilities, (ii) the owners of the sites which will be temporarily leased for the purposed of the project (laydown site, workers accommodation and stockpile site) and, (iii) the landowners of the neighbouring parcels of land who might experience short term negative impacts for the duration of works.

3.2.3 Civil Society and NGOs

This group includes smaller groups in society who may have an interest in the MICRO 2 Project and its social and environmental aspects. Not all groups have been explicitly identified as yet, but their general names/types are included in this list.

Women's Groups

The Tuvalu National Council of Women (TNCW) is a Non-Governmental Organisation (NGO) that was set up in the late 1970's to direct and manage women's affairs and their issues. The council consists of elected women and the formal link between Government and women's communities. TNCW has provided support

in the area of women's political participation, women's handicrafts, legal literacy and recently ran programs on ending violence against women.

Each island has a formal women's organisation that consists of any female who is aged 18 years and above. Under this organisation, women aged 18-59 are obligated to contribute to community functions and requests directed from the organisations which benefits the whole islands community.

Island Disaster Committees

All islands are required to have an established Island Disaster Committee to coordinate preparations and responses for disasters. They have the support of the National Disaster Risk Management Office (NDMO).

Island Youth Groups

Many islands of Tuvalu have active youth groups involved in a range of aspects of community life.

Churches and faith based-community based organisations.

The majority of church members on the three islands are members of the Christian Church of Tuvalu, with smaller numbers practicing the Seventh Day Adventist, Jehovah's Witnesses, and Baha'i faiths. This can also include any faith-based groups which are related to but separate from the church itself.

TANGO

On Funafuti, there exists an umbrella organisation of NGO's called the Tuvalu Association of NGOs (TANGO). TANGO was established in 1986 and has a membership of approximately 48 members. TANGO's core role is to provide a policy voice within government and provide information and communication to its members and the local community. Other activities include capacity building, project and program coordination, and fundraising and resource mobilization.

As mentioned above, the Tuvalu National Council of Women (TNCW) is a Non-Governmental Organisation (NGO) set up to manage women's affairs and their issues. TNCW continues to provide support in the area of women's political participation, women's handicrafts, legal literacy and trainings on gender-based violence and child abuse and exploitation.

Organisations representing people with a disability

Representative organisations for people with a disability will be consulted throughout the MICRO project lifecycle. Fusi Alofa is the only representative organisation currently operating in Tuvalu.

3.2.4 Other Stakeholders and Development Partners

The World Bank is the key Development partner for the MICRO 2 Project. The Asian Development Bank (ADB) and the UNDP are also stakeholders of the MICRO 2 Project with technical expertise under the Outer Island Maritime Infrastructure Project and Tuvalu Coastal Adaptation Project (TCAP) respectively.

3.3 Disadvantaged Vulnerable Individuals or Groups

The WB has released a Directive Addressing Risks and Impacts on Disadvantaged or Vulnerable¹ Individuals or Groups² which has been referenced in the development of this subsection.

It is likely that project-affected parties in the communities will include vulnerable /disadvantaged groups. Further groups may be identified during ESIA preparation and environment and social risk management process. Vulnerable /disadvantaged groups may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon whom they depend.

Particular attention will be paid to adverse impacts on vulnerable/disadvantaged groups who, because of their social position, may be vulnerable to changes brought about by project activities or excluded from project benefits. These include the following:

- people who live with a permanent or temporary disability or health condition that impairs their ability to participate equally in society (henceforth people with a disability)
- female-headed households
- Youth
- Economically disadvantaged
- Women
- Those vulnerable to climate-related disasters

Discussions with the vulnerable/disadvantaged groups affected by the project will be conducted to ensure that consultations with the local community are inclusive and provide an opportunity for their voice to be heard. The assistance of community leaders will be needed to encourage effective representation of Vulnerable /disadvantaged groups in group discussions throughout the project phases. Table 1 lists some of the specific needs which will need to be considered for identified stakeholders in this category in the context of a Tuvaluan community setting.

Table 1: Specific engagement needs of identified disadvantaged or vulnerable groups

Stakeholder Group	Characteristic	Specific Needs
People with a disability	Have core activity restrictions that often require support or removal of barriers to participation.	Accessible meeting spaces and information presented in an accessible manner: visual, audio,

¹ "individuals or groups who, by virtue of, for example, their age, gender, race, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or indigenou status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon whom they depend."

² <https://ppfdocuments.azureedge.net/9598117e-421d-406f-b065-d3dfc89c2d78.pdf>

		graphics, plain language, graphical, etc)
Female headed households	Extent unknown	Select timing of meeting which do not clash with household duties. Flexibility to change times or venue at late notice. Meeting locations should be accessible to women and provide a safe space for their participations including ensuring privacy and confidentiality. - Child care is available.
Youth	Under 18's male and female	Time meetings to accommodate household chores and/or agricultural duties. Meeting locations should be accessible to young women and provide a safe space for their participations including ensuring privacy and confidentiality
Economically disadvantaged	People living on land they do not have legal right to – extent unknown	Dedicated meeting for the economically disadvantaged (if identified on the island) to provide the space to provide their views.
Women	Women are most likely to experience violence, including SEA/SH/	-Meetings timing to accommodation women's existing workload. -Meeting locations to be accessible to women and provide a safe space for their participations including ensuring privacy and confidentiality. - Child care is available.
Those vulnerable to climate-related disasters	Live along the exposed ocean side of the islands in areas prone to inundation	Ensure that individual invitations to these APs are hand delivered and encourage attendance at scheduled sessions.

4 STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder engagement activities will be ongoing through the whole life of the project. Stakeholders will be engaged as early as possible and will continue the engagement throughout the planning, construction or operation phase.

The nature and frequency of follow up consultations will be different depending on the subprojects.

Before the implementation phase of MICRO 2, all affected parties will be informed about the project scope and be provided with contact details for the PMU and details of how they can request further information. They also will be informed of the various ways in which they can access public project information such as through a project website, at the Kaupule office for disclosed reports, the PMU office in Funafuti and through the WB project website updates.

The key communication principles are to:

- Keep the communities and key stakeholders informed in advance of the project progress
- Encourage community participation
- Ensure ‘no surprises’ to key stakeholders and the community
- Listen to feedback, investigate suggestions and adopt them where possible
- Do no harm, particularly when engaging with women and other vulnerable groups.
- Transparency.

4.1 Purpose and Timing of Stakeholder Engagement Program

The SEP is designed to establish an effective platform for productive interaction with the potential affected parties and others with interest in the implementation outcome of the MICRO 2 activities.

The objectives of engaging stakeholders during the development and implementation of MICRO 2 include the following:

- **Ensuring understanding:** An open, inclusive and transparent process of culturally appropriate engagement and communication to ensure that stakeholders are well informed about the proposed. Therefore, whenever information is disseminated, Tuvaluan translations will be used of key summaries to ensure full understanding of communication.
- **Involving stakeholders in the assessment:** Stakeholders will be included in the scoping of issues, the assessment of impacts, the generation of mitigation and management measures and the finalization of the ESIA reports. They will also play an important role in providing local knowledge and information for the baseline to inform the impact assessment.
- **Building relationships:** Through supporting open dialogue, engagement will help establish and maintain a productive relationship between the ESIA team and stakeholders.
- **Engaging vulnerable groups:** An open and inclusive approach to consultation increases the opportunity of stakeholders to provide comments on the proposed Project, and to voice their concerns. Some stakeholders, however, need special attention in such a process due to their vulnerability. Special measures, such a women-only consultations and specific consultations with vulnerable groups, will be considered to ensure that the perspectives of vulnerable stakeholders are heard and considered.
- **Managing expectations:** It is important to ensure that the proposed project does not create or allow unrealistic expectations to develop amongst stakeholders about proposed project benefits.

The engagement process will serve as a mechanism for understanding and managing stakeholder and community expectations, where the latter will be achieved by disseminating accurate information in an accessible way.

- **Ensuring compliance:** The process is designed to ensure compliance with both local regulatory requirements and international best practice.

This will be achieved through :

- Beginning early in the project planning process to gather initial views on the project proposal and inform project design
- Supporting active and inclusive engagement
- Ensuring prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language and is understandable to stakeholders,
- Considering and responding to feedback,
- Addressing project grievances.

Adequate stakeholder consultation will require timing and advance planning. To ensure information is readily accessible to affected stakeholders, and adequate representation and participation of the different groups in the process, MICRO 2 will adopt different methods and techniques based on an assessment of stakeholder needs. Methods for engagement are given in the Table 1 below.

There are a variety of engagement techniques used to build relationships with stakeholders, gather information from stakeholders, consult with stakeholders, and disseminate project information to stakeholders.

When selecting an appropriate consultation technique, culturally appropriate consultation methods, and the purpose for engaging with a stakeholder group should be considered.

Table 1 below lists the recommended engagement mediums that are appropriate for this SEP activities proposed as part of the implementation plan components. Because of the different activities and different stakeholders needs at different times, a wide range of communications methods and mediums are proposed. This range of communication methods were already used for the original MICRO project activities.

Table 2: Engagement Mediums

Medium	Description
Stakeholder Meetings and capacity building	
Focus Group Meetings	The aim of a focus group is to pull together stakeholders with the same interest into a single meeting to discuss issues. Meetings usually have a very specific objective which is aligned with the expectations and interest of the stakeholders' present. This method also includes meetings with government departments and private sector stakeholders with professional responsibilities as well as key civil representative who represent the voice of women and other vulnerable groups. Meeting with women and other vulnerable groups will be done separately to create a safe and more conducive environment for effective consultation.

Consultations with the Falekaupule	<p>These consultations are focused to identify and discuss stakeholder concerns or to provide feedback using detailed information. These consultations should, wherever feasible, be held on the islands, however due to fluctuating levels of access to the outer islands related to COVID-19 restrictions, face-to-face consultations with Falekaupule members visiting or based in Funafuti, who have will be combined with phone calls to island leaders situated on the islands.</p> <p>It is also notes that women are not always equal participants in Falekaupule spaces, as such where women are not involved and able to participate openly and equally in the consultation, separate consultations will be sought with women's representatives.</p>
Community based consultations	<p>These consultations are focused to identify and discuss stakeholder concerns or to provide feedback using detailed information. These consultations should, wherever feasible, be held within the community environment with female-only consultations and specific consultations with vulnerable groups. Consultations with women and vulnerable groups will not seek to ask them directly about experienced of stigma, discrimination or violence but to assess issues more generally to enable the development of effective risk mitigation and response strategies</p> <p>Combined face-to-face & remote communications: Due to fluctuating levels of access to the outer islands related to COVID-19 restrictions, face-to-face consultations with island communities based in Funafuti, who have detailed local knowledge, will be combined with phone calls to island leaders situated on the islands.</p>
Written / visual communications	
Project Information Bulletin	This needs to be a short and concise document providing jargon-free information describing the project actions, the potential social and environmental impacts, the need for the project and the contact details for the project team, including contacts for complaints relating to SEA /SH.
Notice boards	Notice boards (community and work site entrances) are a good tool to use for communication of up-to-date project information such as timing and duration of works, upcoming consultations, project progress and other relevant project information, including contacts for complaints relating to SEA /SH..
Letters	Formal method of communication usually intended to convey very specific messages. Alternatively, it is used as a formal method for request of information.
Emails	Using emails for in-country stakeholders can pose a challenge because of limited internet access due to insufficient telecommunications and/or supporting IT infrastructure. NGOs and most of the Government Ministries do have access to email which can be utilised for communications but arranging of formal community consultations is best arranged through other methods of communication.
Media	
Radio	In Tuvalu, radio is the primary medium for raising awareness and prepare stakeholders for larger events or refined communication to take place. Radio will be an effective communication tool to circulate information of rights related to SEA/SH and processes to make complaints relating to SEA /SH.
Other	

PMU	PMUs will be the ‘familiar faces’ of the project and will, for many stakeholders at the community level, represent the most direct channel to the project. For this reason they will be trained specifically to ensure that they can receive contacts for complaints relating to SEA /SH while upholding a survivor-centred approach. Combined face-to-face & remote communications: Due to fluctuating levels of access to the outer islands related to COVID-19 restrictions, face-to-face consultations with the island communities based in Funafuti, who have detailed local knowledge, will be combined with phone calls to island leaders situated on the islands.
Telephone	Use of the telephone / mobile phone is still regarded as the preferred method for communication because of accessibility and speed. Having a discussion over a phone in order to ensure mutual understanding between two parties is quicker and easier compared to sending an email, waiting for reply.

*Nanumea is the only island of the three where site options are undecided.

The mode of consultation will vary according to the island, activity and the participants, but in all cases will promote participation by ensuring that the venue is accessible, the timing convenient and the manner of conduct of the consultation socially and culturally appropriate. Consultations will be announced to give sufficient notice for participants to prepare and provide input to project design.

4.2 SEP Implementation Plan and for Information disclosure

The project will ensure that the different activities for stakeholder engagement, including information disclosure, are inclusive and culturally sensitive. Measures will also be taken to ensure that the vulnerable groups will have meaningful opportunities to participate in and benefit from project activities.

Table 2 sets out the implementation plan for stakeholder engagements and community consultations. The plan is for the lifecycle of the project and constitutes the following components:

Activity: the various operational consultation activities that will be undertaken as part of the SEP

Objective: the target that each activity needs to reach

Stakeholder: the various stakeholders to be targeted during implementation of the SEP activity

Responsibility: who will lead this activity

Medium: the method by which the engagement or consultation will be done. This includes disclosure whereby information will be disclosed locally on a website or responsible parties will ensure documentation is available in a relevant location, acknowledging there are often internet connectivity limitations in outer islands of Tuvalu.

Table 3: Stakeholder and Community Consultation Plan

No	MICRO Project Activity	Timetable	Objective	Stakeholders	Responsibility	Medium
A1	Feasibility, decision on the sites / technologies and preliminary designs	From Project effectiveness through to tendering.	Bring stakeholders into the decision making around the site and type of investments. Discuss potential impacts and mitigation measures.	All identified	PMU	Community capacity building plan Community Consultations Focused group meetings Public meetings Emails and letters
A2	Disclosure of updates to the ESIA	Prior to tendering (ESIA) Prior to works starting (development of CESMP)	To disclose ESIA	All identified	PMU	Newspaper Website Translated Executive Summaries
			Advise stakeholders of final design, construction methods and updated mitigation and management plan. Advise project affected people of GBV risks and prevention strategies and management of labour influx	Communities (including women, disadvantaged and vulnerable) Site occupants (State owned enterprises. Government agencies) Site users (if different from above) wide variety of stakeholders (political, religious or cultural leaders, health teams, local councils, social workers, women's organisations and groups	PMU	One-on-one meetings Community consultations Translated executive summary available on islands Full reports available on islands, at PMU and on project websites Specific needs for women, disadvantaged and vulnerable groups (Table 1)

No	MICRO Project Activity	Timetable	Objective	Stakeholders	Responsibility	Medium
				working with children)		
A3	Detailed design	Once Contractor is on board and prior to works starting	Keep stakeholders involved in any design updates. Public announcements	Government agencies, site occupants, site users	PMU	Emails, One-on-one consultations Radio and websites Noticeboards
A5	Commencement of Works	Week before commencement of works.	To advise all stakeholders of commencement of civil works.	All identified stakeholders Site occupants (State owned enterprises. Government agencies)	Contractor	Newspaper Email One on one meetings Specific needs for women, disadvantaged and vulnerable groups (Table 1)
			To reconfirm ongoing consultation, feedback and GRM processes	Community (including women, women, disadvantaged and vulnerable groups) Site occupants (State owned enterprises. Government agencies)		Community Notice Boards Community workshops and consultations Website Community Liaison Officer Specific needs for disadvantaged and vulnerable groups (Table 1)
		At the start and ongoing throughout works	Ensure that the people affected by the project are properly informed	Wide variety of stakeholders (political, religious or	Contractor and PMU	Community workshops and consultations

No	MICRO Project Activity	Timetable	Objective	Stakeholders	Responsibility	Medium
			of risks and aware of prevention and response strategies	cultural leaders, health teams, local councils, social workers, women's organisations and groups working with children)		Specific needs for women, disadvantaged and vulnerable groups (Table 1)

Note the GRM for the project, which constitutes one of the consultation mechanisms, is in section 5.

All the public documents for MICRO 2 will remain in the public for the duration of the project. This SEP needs to be updated and refined throughout the lifecycle of the project. During this process the focus and scope of the SEP will change to ensure that the MPWIELMD addresses external changes and adheres to the objectives of this Plan.

4.3 Proposed Strategy to incorporate the view of vulnerable groups

The Project has and will carry out targeted stakeholder engagement with women and vulnerable groups to understand concerns/needs in terms of project design, operation and accessing information. The details of strategies to be adopted to effectively engage and communicate with women and members of vulnerable groups have been identified and will be implemented throughout MICRO 2 (see Table 1 in Section 3.3).

Focused efforts will be made to engage directly with the relevant stakeholders, including women and vulnerable groups at the local level. Affected individuals will be consulted directly or via their representatives.

In addition, special efforts will be made to meet with representatives of potentially vulnerable groups who may not be reached through established structures.

All meetings will follow local practices and norms.

All affected communities and groups will be made aware of the project feedback and grievance mechanism.

4.4 Future Phases of projects

During the implementation of MICRO 2 there will be continuous meetings for the stakeholders and affected parties to keep them updated on the latest development of the project. Community consultations will be held at the various phases of the project (the preparation phase, construction and operation phase). The engagement level will depend on the level of impacts of the project.

4.5 Responsibility for SEP Implementation

The implementation of the SEP will be the overall responsibility of the MICRO PMU, with support from International Safeguards Specialist as required. Responsibilities are indicated in Table 2.

The PMU has an International Safeguards Specialist and is supported by a National Safeguards Specialist within the Tuvalu Central Project Management Office (CPMO). Together they will take the lead role in the

implementation of the SEP, with support from the MICRO 2 Project Manager. The PMU will be responsible for arranging and facilitating the meetings as it appropriate with their in-depth knowledge of the natural, social and traditional environments within Tuvalu. The PMU will also be the focal point for all stakeholder queries and contacts in relation to the implementation of the SEP or the GRM.

It is also the responsibility of the PMU to ensure that gender balance is achieved throughout the implementation of the SEP and the National Safeguards Specialist in the CPMO along with the MICRO 2 Project Manager will make culturally appropriate recommendations on strategies to achieve this such as separate meetings for males and females or targeting female input through women's groups.

All contractors in charge of carrying out specific project activities will also be required to implement the relevant provisions of the SEP, as indicated in Table 2. The grievance mechanism requirements will be laid out in the tender documentation.

5 GRIEVANCE REDRESS MECHANISM

5.1 Definitions of Grievance

A grievance mechanism has been developed for potential use by external stakeholders including project affected people. The aim of the grievance mechanism is to achieve mutually agreed resolution of grievances raised by such stakeholders.

The main objective of a Grievance Redress Mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of project;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoids the need to resort to judicial proceedings.

This GRM ensures that complaints and grievances (see 'definitions' below) are addressed in good faith and through a transparent and impartial process, but one which is culturally acceptable. It does not deal with 'concerns' which are defined as questions, requests for information, or perceptions not necessarily related to a specific impact or incident caused by a project activity. If not addressed to the satisfaction of the person or group raising the concern, then a concern may become a complaint. Concerns are not registered as a grievance but will be managed via through ongoing stakeholder engagement.

Key definitions are as follows:

- Complaint: an expression of dissatisfaction that is related to an impact caused by the project activities, which has affected (i) an individual or group adversely, (ii) the interests of an individual or group and who wants a proponent or operator (or contractor) to address and resolve it (e. g. problems related to dust deposition, noise or vibration). A complaint is normally of a less serious nature than a grievance; and

- Grievance: a claim raised by an individual or group whose livelihood, health and safety, cultural norms and heritage are considered to have been adversely affected (harmed) by a project activity which, if not addressed effectively, may pose a risk to project operations (through stakeholder actions such as access road blockages) and the livelihood, well-being or quality of life of the claimant(s).

This GRM sets out the following steps to be taken to resolve grievances, the role of different staff members involved and timeframes to reach a decision on grievances. The types of grievances stakeholders may raise include, but are not limited to:

- Negative impacts on communities, which may include, but not be limited to financial loss, physical harm and nuisance from construction or operational activities;
- Health and safety risks;
- Negative impacts on the environment; and
- Unacceptable behaviour by staff or employees. Project workers have a separate GRM under the MICRO 2 Labour Management Procedure that they can use to register grievances with their working conditions or similar.

5.2 Purpose of the GRM

The GRM is presented below to uphold the project's social and environmental safeguards performance. The purpose of the GRM is to record and address any complaints that may arise during the implementation phase of the project and/or any future operational issues that have the potential to be designed out during implementation phase. The GRM is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination) for any reports made by project affected people (APs). The GRM works within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level.

The key objectives of the GRM are:

- Record, categorize and prioritize the grievances;
- Settle the grievances via consultation with all stakeholders (and inform those stakeholders of the solutions)
- Forward any unresolved cases to the relevant authority.

5.3 GRM for MICRO 2

As the GRM works within existing legal and cultural frameworks, it is recognized that the GRM will comprise community level, project level and Tuvaluan judiciary level redress mechanisms. The details of each of those components are described as follows.

Appendix A shows the MICRO GRM process which is described below in detail.

5.3.1 Community Level Grievances

Community level grievances are most likely with the proposed investments. Issues related to the influx of labour, any disturbance from the workers accommodation, encroachment across land boundaries, noise, dust and resource use should be expected and planned for.

Discussions with the Kaupules and the MICRO PMU have identified the following process which will be used to address the issues and concerns that an AP may have. The key point of contact for the AP will be the Kaupule, who will liaise directly with both the Contractor and the Supervision Engineer. The party receiving the complaint will receive and document all matters and issues of concern from the local community and forward copies of all grievances to the Contractor, Supervision Engineer and PMU, which will operate under MPWIELMD.

Given the remote location of the project sites, the number of construction workers and the small size of the communities involved, it will be expected that there will be full and free access to the site-based Supervision Engineer to raise any issues of social concern as a result of the construction works. All efforts will be made to address any community or individual concerns in a timely and transparent manner and without retribution to the affected person to minimize any impacts that may affect project implementation.

For concerns such as damage to trees or food gardens i.e., taro plots without permission or compensation, the AP will discuss this with the Kaupule, who will then raise the matter immediately with both the Contractor and the Supervision Engineer, if unresolved at the project site. If the concern can be addressed without delay, and the outcome is satisfactory to the AP, the matter is closed. The contractor will provide a report to the Supervision Engineer as soon as the complaint has been resolved.

For more extensive complaints such as damage to buildings or land issues such project/Contractor's encroachment on someone's land, the AP will make a formal written statement to be delivered to the Kaupule, who will forward this to the Contractor. The Contractor will document the complaint and forward a copy to the Supervision Engineer and MICRO PMU. The complaint must be acknowledged within 24 hours of the complaint being lodged. The timing and manner in which it will be resolved will be conveyed to the AP by the Kaupule within 48 hours. The contractor will provide a corrective action report to the Supervision Engineer as soon as the action has been taken.

If the complaint is not resolved by the Contractor or Supervision Engineer to the satisfaction of the AP, then the Kaupule will forward the complaint directly to MPWIELMD PMU, and with a copy to the Ministry of Home Affairs. The matter will be addressed with due consideration to the seriousness of the complaint and be carried out promptly. The MPWIELMD PMU will attend to the complaint within 24 hours and advise the Kaupule how it will be addressed. MPWIELMD PMU will decide within two weeks. The AP may, if so desired, discuss the complaint directly with the MICRO PMU or its representative at a mutually convenient time and location. If the complaint of the AP is dismissed, the AP will be informed of his/her rights in taking the complaint to the next step. However, every effort will be made to resolve the issue to the mutual satisfaction of both the parties.

Should this process not resolve the matter, then the AP may file a grievance on the World Bank website www.worldbank.org/GRS or can take the grievance to the Tuvalu Judicial System. The filing of the grievance will be at the AP's cost, but if the court shows that PMU has been negligent in making their determination, the AP may seek costs.

Where issues caused by the project are raised and resolved through these existing community level GRM, it is important that these are captured by the MICRO PMU, which is responsible for recording all complaints/outcomes, and to help, as required for their resolution.

5.3.2 Project Level Grievances

The following GRM shall be put in place for all MICRO Project works to register, address and resolve complaints and grievances raised by communities during implementation of project works. Contractors are required to adhere to this formal process.

Complaints may be submitted in person, via telephone, electronically, in letter or through a representative of the above community level process to the PMU. Complaints and grievances will adhere to this process and will submit (via recipient of complaint) directly via GCLS website or email to project PMU. All complaints must be formally registered in the Projects complaint register. Should the complaint be received by the Contractor or Supervision Engineer directly, they will endeavour to resolve it immediately and submit notification of the complaints and resolution to PMU for entry into the complaints register or through the project website. For all grievances across all the works, the PMU is responsible for ensuring that, on receipt of each complaint, the date, time, name and contact details of the complainant, and the nature of the complaint are recorded in the Complaints Register. Please note that the Complaints Register for all project related issues will be managed through the MICRO website.

Should the complainant remain unsatisfied with the response of the Contractor, the complaint will be referred to the PMU Project Manager.

Specifically:

1. The PM will take earnest action to resolve complaints at the earliest time possible. It would be desirable that the AP is consulted and be informed of the course of action being taken, and when a result may be expected. Reporting back to the complainant will be undertaken within a period of two weeks from the date that the complaint was received.
2. If the PM is unable to resolve the complaint to the satisfaction of the AP, the complaint will then be referred by the PM to the Project Steering Committee (PSC). The PSC will be required to address the concern within 1 month.
3. Should measures taken by the Project Steering Committee fail to satisfy the complainant, the aggrieved party is free to take his/her grievance to the Tuvaluan Court, and the Court's decision will be final.
4. The community will be informed of the GRM through a public awareness campaign and discussion with the Kaupule. The Project shall also erect appropriate signage at all works sites with up-to-date project information and summarizing the GRM process, including contact details of the relevant Contact Person. Public information bulletins websites and other public information will also include this information. Anyone shall be able to lodge a complaint and the methods (forms, in person, telephone, forms written in Tuvaluan) should not inhibit the lodgement of any complaint.
5. The Complaints Register via the MICRO website will be maintained in accordance with World Bank procedures by the PMU Project Manager, who will log the: i) details and nature of the complaint ii) the complainant name and their contact details iii) date iv) corrective actions taken in response to the complaint. This information will be included in MPWIELMD's progress reports to the Bank.

5.3.3 Tuvalu Judiciary Level Grievance Redress Mechanism

The project level process will not impede affected persons access to the Tuvalu legal system. At any time, the complainant may take the matter to the appropriate legal or judicial authority as per the laws of Tuvalu.

5.4 Grievance Documentation and Reporting

Resolved and escalated grievances/cases would be documented daily into the GRM System (which will likely be a simple spreadsheet) by the PMU. The PMU Project Manager would exercise oversight over the system and track resolution of all grievances/cases.

Monthly case/grievance reports will be generated to inform management decisions. Quarterly reports would also be generated and reported to the MPWIELMD as part of the Project's progress reporting to the World Bank.

6 MONITORING AND REPORTING

Monitoring and evaluation of the stakeholder process is considered vital to ensure MPWIELMD and MICRO 2 PMU is able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective.

The SEP will be evaluated by the PMU Environmental and Social Advisor every 6 months to ensure it remains relevant.

Adherence to the following characteristics/ commitments/ activities will assist in achieving successful engagement:

- Sufficient resources to undertake the engagement.
- Inclusivity (inclusion of key groups) of interactions with stakeholders.
- Promotion of stakeholder involvement.
- Sense of trust in MPWIELMD and the MICRO 2 PMU shown by all stakeholders.
- Clearly defined approaches; and
- Transparency in all activities.

Monitoring of the stakeholder engagement process allows the efficacy of the process to be adjusted to be fit for purpose.

Two distinct but related monitoring activities in terms of timing will be implemented:

- During the engagement activities: short-term monitoring to allow for adjustments/improvements to be made during engagement; and
- Following completion of all engagement activities: review of outputs at the end of engagement to assess the effectiveness of the SEP as implemented as part of overall project evaluation.

6.1 Involvement of the stakeholders in the monitoring activities

The Project will provide opportunity to stakeholders, especially Affected Parties to monitor certain aspects of project performance and provide feedback. GRM will allow stakeholders to submit grievances and other types of feedback.

In the meantime, MICRO 2 is using a number of consultative methods that include online meetings, community consultations, meeting with key ministries, emails, phones and also the project website.

The identification of MICRO 2 related impacts and concerns is a key element of stakeholder engagement that will occur over the complete MICRO 2 life cycle. As such, the identification of new concerns and impacts as the project progresses will serve as an overall indicator for the utility of the stakeholder engagement process.

6.2 Reporting back to the Stakeholder Groups

The SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP.

Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the project during the year may be conveyed to the stakeholders through the projects periodic (monthly, quarterly or annually) reporting.

Appendix A: GRM Flowchart

