



Ministry of Fisheries, Marine Resources and Agriculture
Male', Republic of Maldives

STAKEHOLDER ENGAGEMENT PLAN (SEP)
FOR
Transforming Fisheries Sector Management
in South-West Indian Ocean Region and Maldives Project (P179242)

Table of Contents

List of Abbreviations.....	4
1. Background.....	6
2. Project Description	7
2.1 Project Components.....	7
Component 1: Enhance Evidence-based Management Advice to the Fisheries Sector in the South-West Indian Ocean Region (Cost/IDA Grant US\$12 million, implemented by the IOC) (GCRF Pillar 3)	8
Component 2: Supporting Maldives as the Catalyst for Strengthened Regional Capacity for Fisheries Governance and Management (Cost US\$26.88 million, to be implemented by MoFMRA/Maldives; IDA Grant US\$13.44 million, IDA Credit US\$13.44 million) (GCRF Pillar 2).....	9
Component 3: Enhanced Competitiveness and Private Sector Participation in Maldives for improving Business Climate for Fisheries in Maldives and the Southwest Indian Ocean Region (Cost US\$82.68 million, to be implemented by MoFMRA/Maldives; IDA Grant US\$12.96 million, IDA Credit US\$12.96 million, and Private Capital Mobilization US\$56.76 million) (GCRF Pillar 2).....	11
2.2 Project Beneficiaries.....	12
3. Potential Social and Environmental Impacts and Risk.....	13
4. Project Implementation Arrangements	14
5. Objective of The Stakeholder Engagement Plan	15
6. Regulations and Requirements	16
6.1 National Requirements	16
6.1.1 Right to Information Act (Act no: 1/2014).....	16
6.1.2 Decentralization Act (Act no: 24/2019)	17
6.2 World Bank Requirements	17
6.3 Stakeholder Engagement Plan and Disclosure	17
7. Brief Summary of Previous Stakeholder Engagement Activities.....	18
7.1 Lessons Learned from Previous Consultations	20
7.2 Stakeholder Identification and Analysis.....	20
7.3 Project Affected Parties	22
7.4 Other Interested Parties	23
7.5 Disadvantaged/ Vulnerable Individual or Groups	24
7.6 Summary Stakeholder Needs	26
8. Stakeholder Engagement Program	32
8.1 Purpose and Timing of Stakeholder Engagement Program.....	32
8.2 Information Disclosure	33
8.2 Proposed Strategy for Stakeholder Engagement	36
8.3 Proposed Strategy/Differentiated Measures to Include the Views of And Encourage Participation by Vulnerable Groups.....	39
8.4 Public Comments and Feedback/Reporting to Stakeholders.....	40

9. Roles, Responsibilities of Implementing Agencies and Resources for Implementing Stakeholder Engagement Activities.....	40
9.1 Resources.....	40
9.2 Estimated Budget.....	40
10. Grievance Redress Mechanism	44
10.1 Scope of the GRM.....	44
10.2 GRM Structure	45
10.2.1 Composition of Grievance Redress Committee (GRC).....	45
10.2.2 Process of Reporting Grievances.....	45
10.2.3 Focal Points for Receiving/Recording Grievances.....	45
10.2.4 Screening, Acknowledgment and Closure of Grievances	46
10.2.5 Appeal Process	46
10.3 Awareness Raising on GRM	46
10.4 Monitoring and Reporting	47
10.4.1 Project Level Reporting and Monitoring.....	47
10.4.2 Reporting to World Bank	47
10.4.3 GRM Contact Information	47
11 Monitoring and Reporting	48
11.1 Involvement of Stakeholders in Monitoring Activities	48
11.2 Reporting Back to Stakeholder Groups.....	49
11.3 Reporting to The World Bank	49
12.Reference.....	49

List of Abbreviations

AI	Artificial Intelligence
ALDFG	Analysis of Abandoned, Lost and Discarded Fishing Gear
CHSP	Community Health and Safety Plans
CMM	Conservation Management Measures
CPMD	Corporate Programme Management Division
EAF	Ecosystem Approach to Fisheries Management
EE	Energy Efficiency
EEZ	Exclusive Economic Zone
EFA	Ecosystem Based Approach in Fisheries
EIA	Environment Impact Assessment
EMP	Environment Management Plan
EPA	Environment Protection Agency
ESCP	Environmental and Social Commitment Plan
ESF	Environment and Social Framework
ESIA	Environment and Social Impact Assessment
ESMF	Environment and Social Management Framework
ESMP	Environment and Social Management Plan
ESMS	Environmental and Social Management Systems
FAD	Fish Aggregating Devices
FAO	Food and Agriculture Organization
FI	Financial Intermediary
GBV	Gender Based Violence
GHG	Green House Gas
GoM	Government of Maldives
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IOC	Indian Ocean Commission
IOTC	Indian Ocean Tuna Commission
IoT	Internet of Things
IUU	Illegal, Unreported and Unregulated
LGA	Local Government Authority
LMP	Labour Management Plan
MCS	Monitoring, Control and Surveillance
MEE	Ministry of Environment and Energy
MMRI	Maldives Marine Research Institute
MoFMRA	Ministry of Fisheries Marine Resources and Agriculture
MTC	Minimum Terms and Conditions
OHSMP	Occupational Health and Safety Management Plan
PAI	Project Area of Influence
PD	Project Director
PDO	Project Development Objectives
PMU	Project Management Unit
PSMA	Agreement of Port State Measures
RPMU	Regional Project Management Unit

RSW	Refrigerated Sea Water
SEP	Stakeholder Engagement Plan
SFRDP	Sustainable Fisheries Resources Development Project
SSF	Sustainable Small-scale Fisheries
SWIO	South West Indian Ocean
SWIO-FFA	SWIO-Fisheries Framework Agreement
SIOFA	South Indian Ocean Fisheries Agreement

1. Background¹

Maldives and 11 other countries border the waters of the South-West Indian Ocean (SWIO). The island nations of Comoros, Madagascar, Mauritius, Seychelles and France (La Réunion and other islands) are the Indian Ocean Commission (IOC) member countries. Maldives, together with IOC members and additional six mainland countries of Kenya, Mozambique, Somalia, South Africa, Tanzania, and Yemen constitute the South-West Indian Ocean Fisheries Commission (SWIOFC), a regional fisheries body.

Fisheries, especially small-scale fisheries play a significant role for the livelihoods of an estimated 35 million people in the SWIO countries of whom 14.3 million people live in low elevation coastal areas, and 3.3 million persons are directly employed in marine fishing. They are often among the most vulnerable communities with high exposure to climate change impacts. The fisheries sector is a major contributor to nutritional health and food security in the SWIO region, especially for poor coastal or remote island communities with limited alternatives to fish for animal protein, as well as essential nutrients, vitamins, minerals, and trace elements. Fisheries also account for a substantial part of Gross Domestic Product (GDP) of the SWIO countries.

The SWIO Region is home to multiple fish species, yet pressure on fish stock has reached a high level, as many countries compete for the resources in the area. One third of the SWIO fish stocks are over-exploited or depleted (especially the high-value resources, such as shrimp, lobster, and sea cucumber), with around 40 percent being fully exploited. Critical ecosystems, already weakened by land-based activities and pollution are further endangered by loss of biodiversity, and destruction of coral reefs and mangroves. The fisheries sector in the SWIO is already largely regional, with each country's decision affecting activities of other countries. Large national investments, such as ports, fishing fleets, or processing plants, are competing against each other for the same finite resource. The SWIO countries also face common constraints about their fisheries sector: weak governance, weak institutional capacity, and a fragile business environment. Women and youth's participation in the fisheries sector is often unrecognized and underpaid in SWIO countries. Women's representation within the MSME sector is significantly limited for example in the Maldives, especially in the smaller islands. Fisheries sector activities in SWIO region are extremely vulnerable to climate change and disaster events and are increasingly being affected. Regional coordination and cooperation are therefore needed to avoid conflicts and suboptimal sectoral investments, and to promote equitable distribution of wealth. Furthermore, several technical aspects of the sector are regional in nature (e.g., monitoring, control and surveillance, and safety at sea), and their implementation, at the least, must be coordinated at a regional level. Common interests in research or capacity reinforcement could be best consolidated at the regional level to general economies of scale through the creation of joint program and south-south cooperation.

Notwithstanding the progress so far, newer actions are needed at the SWIO region to ensure sustainability of fish stock, improve the fisheries sector economy, overcome the setback suffered due to COVID-19 pandemic, and transition towards a resilient sector economy. The three main needs for improved management and governance of the fisheries sector in the SWIO countries are (i) the need to focus on reduction of destructive fishing methods to ease the ever-increasing stress on regionally shared resources; (ii) the need to maximize economic and social benefits from coastal fishery resources and (iii) the need to create credit facilitation to address the prevailing weak investment and business climate, coupled with limited or underperforming infrastructure and services constraining private sector development in the fisheries sector in SWIO countries.

Maldives is an island nation comprising of 1,192 islands scattered in the middle of the Indian Ocean. Due to the geographic arrangement of the country, the livelihood is dependent on the ocean resources for subsistence and its economic development. Tourism sector contributing 28% of the GDP, the fisheries sector still remains a large source of employment, the largest source of physical exports, one of the few local industries supplying the tourist resorts and major food supply for the local market. The fisheries sector is particularly important in outer atolls and accounts for 20% of employment in the country.

The challenges in the SWIO countries are similar in Maldives, but the country had recently started focusing on reef fishes such as groupers and recreational fishery; prepared management plans and started implementing these plans. In addition, over the past 3 decades, Maldives have built a domestic industrial capacity in the fisheries sector: not

¹ Based on the Draft Project Appraisal Document for Transforming Fisheries Sector Management In South-West Indian Ocean Region and Maldives Project

dependent on foreign fishing fleet and revenue earned thereof. Some SWIO countries are interested and will benefit from collaboration with Maldives in setting up their own industrial fishing, processing and marketing capacities, so that a substantial portion of the poor fishing communities would have an opportunity of better employment and income. Maldives also has very constrained climate for private sector expansion, absence of adequate commercial credit, and the public finance is aimed to create assets and businesses such as ice plants, processing units, etc., without trying to leverage private investment. Further, although there are nascent financial institutions in Maldives such as the SME Development Finance Corporative (SDFC), access to credit for women in the fisheries sector remains limited based on conservative lending regimes, high interest, difficulties in producing collateral and inability to demonstrate credit worthiness due to lack of cash flow within banking systems. Business development services itself are in their infancy and few such services exist in the capital city Male'. Access to these services to women in outer islands is therefore significantly limited. Another notable challenge facing female entrepreneurs is the remote geographic nature of the islands which inhibits their full access to the market. Women can act as local retail agents in their residential islands but selling their products beyond their geographic boundaries requires involvement of middlemen and access to transportation systems. Women are also more susceptible to impacts from climate change especially when engaging in sustainable fisheries and local fishing.

Priority challenges for Maldives are similar to challenges for the SWIO region and addressing these challenges in Maldives will create appropriate demonstration and impetus for improved management of fisheries resources in the SWIO region. These priority needs include: (i) sustenance of capture fishery at about 120,000 tons and maintaining an export of about 60 percent of the catch are important for the national income and welfare of fishers and their families; (ii) sustainability of live-bait and reef fishing, diversify into value-added products; and (iii) economic diversification into mariculture and associated integrated activities to be able to create substantive jobs, especially for women and youth, and absorb labor from (partial) shift away from capture fishery. However, while attempting the above, it is important to: (a) promote innovation and resources-efficient technology, processes and decarbonization; relevant technical skill development; and (b) improving the enabling environment for private sector investment and partnerships for both value chain development and the exploration of high-value niche export markets – to establish the “regionally appropriate” pathways for development and growth in the fisheries and allied sector that improves the income of people currently engaged in subsistence fishery activities.

Sustenance, development, and growth in the fisheries sector in Maldives is closely linked to the SWIO regional agenda on conservation, shared vision for sustainable growth of the sector including diversification, and compliance to regional/international standards. There are substantial benefits to Maldives from economies of scale offered by shared regional information infrastructure, technologies, and knowledge related to monitoring, control, and surveillance; safety at sea; and towards adaptation to impacts of climate change on the fisheries sector. In return, Maldives could offer several benefits to other SWIO, especially the small island countries. In the interconnected ecological region, every country could benefit by enhancing the positive externalities yielded by other countries' national activities.

2. Project Description²

The Project Development Objective (PDO) of the Transforming Fisheries Sector Management in South-West Indian Ocean Region (SWIO) and Maldives project is to strengthen regional, evidence-based fisheries management in the SWIO and to improve competitiveness in the fisheries sector in the Maldives. The project will have a regional benefit focus and the sets of activities will be delineated along such focus on explicit needs for activities shared by all SWIO countries, and activities undertaken in Maldives that provide regional benefits including bilateral benefits.

2.1 Project Components

The project comprises three key components and several sub-components under each component. Component 1 will be implemented by the IOC, and all activities will be coordinated and agreed with member countries. Components 2 and 3 will be implemented in and by Maldives but with the aim to influence management of the fisheries sector in other SWIO countries. The distinction between Component 2 and Component 3 is about the role of the government:

² Based on the Draft Project Appraisal Document for Transforming Fisheries Sector Management In South-West Indian Ocean Region and Maldives Project

Component 2 focuses on public and regulatory functions that are needed, whereas Component 3 is about actions that are needed to incentivize the private sector to ensure sustainable growth, diversification and inclusion.

Component 1: Enhance Evidence-based Management Advice to the Fisheries Sector in the South-West Indian Ocean Region (Cost/IDA Grant US\$12 million, implemented by the IOC) (GCRF Pillar 3)

This component will aim to enhance fisheries management in the SWIO region as a whole and reinforce regional collaboration through production and sharing of regionally relevant knowledge, targeted capacity development, improving fisheries stock assessments and the production of management advice, and by promoting effective collaboration with other regional programs and initiatives supporting different elements of fisheries management, policy or research. All activities will ensure the best possible use of the technical expertise available with the IOC itself and sourcing the additional expertise, as is required to overcome the low availability of local technical expertise in the SWIO region, from the Food and Agriculture Organization (FAO) to effectively support the SWIOFC. Component 1 has three subcomponents which are as follows.

Sub-component 1.1: Promoting the Development and Coordination of Relevant Innovative Regional Research with a Focus on Capacity Development Programs and Initiatives (US\$4.5 million).

This subcomponent aims to reinforce the SWIOFC framework for the development and application of science-based fisheries management in the region. It is expected to lead to the acquisition of a common lexicon and knowledge base among the experts involved, as well as the reinforcement of a community of good practice across the institutions dealing with fisheries management and research, promoting opportunities for exchange of expertise, and lessons learned between member countries. The training and mentoring program of the SWIOFC will be developed considering the current under-representation of women in the SWIOFC and in the panel of experts in fisheries related subjects in the region. It will include (i) the promotion, support, and coordination of an innovative regional fisheries science program focusing on priority areas of the SWIOFC, already identified by the SWIOFC and the Scientific Committees, (ii) the development and implementation of a regional training and mentoring program coordinated by the IOC, that aims at overcoming the limitations of unconnected short courses, and at allowing a better tailoring of the training to the knowledge needs and skill level of different groups of experts, and skills training for 100,000 small-scale fisherpersons, especially women, in diversified fisheries sector business enterprises; and (iii) supporting the further development of a network of Regional Centres of Excellence (RCEs) on management and applied research of fisheries and mariculture, allowing the development of a regional critical mass in scientific areas of particular relevance to science-based fisheries management advice in the region, complementing capacity gaps through regional assistance exchanges, and reducing the continued dependence on expertise from consultants and companies from other areas of the world.

Sub-component 1.2: Coordinating and Consolidating Regional Cooperation for Evidence-based Advice on Management of Fisheries and Other Uses of Marine and Coastal Ecosystems (US\$6 million).

This subcomponent aims to improve fisheries assessment and management in all its dimensions (social, economic, and ecological), by developing and applying guidance on the use of common standardized tools and approaches for assessment, improving the management and use of information and data on fisheries, and the development or revision of Ecosystem Approach to Fisheries Management (EAF)-compatible fisheries management plans for implementation by member countries. The work under this activity will be structured in a way to make the best use of the collective knowledge and limited resources of the member countries and directly support the work conducted by the Scientific Committee and Working Groups, in tight connection with subcomponent 1.1. This subcomponent will include: (i) support to meetings and intersessional work of the IOC, the SWIOFC Commission, the SWIOFC Bureau, the Scientific Committee and Working Groups and Parties; and incremental operating costs of the IOC and its project management unit specifically set-up to implement this project including monitoring, evaluation, and reporting; (ii) improving the stock assessments currently undertaken on a regular basis, through the implementation and expansion of tools and capacity for the application of data-limited approaches to the production of stock assessment and fisheries management advice, at national and regional level; (iii) supporting the adoption of sustainable systems and processes for managing and accessing information and data on data-limited and capacity-limited fisheries, covering most steps of the fisheries data process, from collection to analysis, passing by Data Management, and the on-going work on recovering and making available relevant data from previous projects run in the region; and (iv) supporting the

development, revision and implementation of EAF-compatible fisheries management plans, including the setup of a sustainable mechanism within the SWIOFC to continuously monitor, evaluate and share knowledge on EAF implementation in the SWIO region.

Sub-component 1.3: Linking and coordinating the Fisheries Initiatives and Programs in the region (US\$1.5 million).

This activity builds on past processes of the SWIOFC, creating opportunities for new work lines and importantly, reducing overlap and promoting not just synergies but actual close collaboration between different initiatives and activities promoted, implemented and funded by multiple actors, in order to promote an efficient use of human and technical resources and enhance collaborative implementation of projects and learning, in the best interest of the regional marine fisheries communities and fisheries authorities, including the effective management of the uses of regional marine ecosystems, and the development of marine aquaculture. The secretariat of the SWIOFC/FAO will also ensure that this activity includes complementarity of resources from other major projects and programs linked to the SWIOFC, including the SWIOFC-NC PP and FAO-EAF Nansen projects, to allow an optimized use of resources and efforts to continue the SWIOFC work program. This subcomponent will include: (i) support for the reinforcement of the role of the SWIO Fisheries Commission as Steering Committee and high-level coordinator of projects dealing with fisheries in the region; (ii) cooperative implementation of international and regional fisheries instruments adopted by the SWIOFC, namely the MTC and Conservation and Management Measures for the Indian Ocean Tuna Commission (IOTC) and the Southern Indian Ocean Fisheries Agreement (SIOFA); and (iii) coordination and the development of new policy, guidelines or good practices relevant to the SWIOFC, in cooperation with other regional organizations, and under the scope of the science-based knowledge and expertise in the region, with a particular attention to the development of an SSF Regional Plan of Action specific to the SWIO.

Component 2: Supporting Maldives as the Catalyst for Strengthened Regional Capacity for Fisheries Governance and Management (Cost US\$26.88 million, to be implemented by MoFMRA/Maldives; IDA Grant US\$13.44 million, IDA Credit US\$13.44 million) (GCRF Pillar 2)

Maldives is leading in sustainable fisheries management in the SWIO region, demonstrated by Maldives' compliance to IOTC conservation management measures, augmented monitoring, control and surveillance (MCS), and formulation of appropriate and modern fisheries sector legislation and management plans. Investments toward improved governance and management in Maldives will not only be beneficial for Maldives but also to the SWIO countries as these: (a) enhance the positive externalities; (b) address common constraints related to weak human and institutional capacity, weak regulatory regimes and business environment that do not allow sustainable economic growth from improved management of coastal fishery resources; and (c) greater regional cohesion in the international fora, especially among the like-minded small island states that include countries in the SWIO region in negotiations of fishing-related agreements to forge collective decisions for shared regional outcomes. In addition, Maldives will provide the functions of a "regional enabler" (or "lighthouse") by: (i) demonstrating benefits of using ecological limits for improved fisheries governance, and (ii) providing knowledge and capacity building support to the other countries in SWIO region, especially the island countries. Maldives will also benefit from learning and mutual collaboration. This component will include the following subcomponents.

Subcomponent 2.1: Improved and Innovative Implementation, Enforcement and Monitoring of Fisheries Management Plans and Sharing Results with SWIO Countries (US\$5.47 million).

This subcomponent would include: (a) applying enhanced catch reporting, innovations such as electronic tags, low-cost radars and artificial intelligence, and undertaking scientific studies to support implementation, periodic evaluation and updating of climate-resilient fisheries management plans already prepared such as the grouper management plan, the diamond squid management plan, and the bait fish management plan; (b) support to enhanced institutional capacity and knowledge related to the prevention, detection and suppressing of illegal, unreported and unregulated (IUU) fishing within the exclusive economic zone (EEZ) of Maldives, following international models and practices; (c) sharing of annual evaluation reports from the implementation of aforementioned management plans with all SWIO countries through the regional fisheries dashboard of the SWIOFC, and establishment of information exchange with maritime fusion centres in the Indian Ocean Region, and organizing annual dialogue forums to determine use and applicability of such plans and actions in other SWIO countries and the likeminded

coastal states (called the “G-16” countries); and (d) preparation and implementation of climate-resilient management plans for yet other important fish stocks in Maldives using principles and methods agreed in the SWIO country dialogue forums and as advised by SWIOFC innovative science program, especially to build resilience to climate change (as in subcomponent 1.1).

Subcomponent 2.2: Augmented Comprehensive Quarantine, Disease Surveillance and Management and Experience Sharing with SWIO Countries (US\$4.87 million).

This subcomponent would include: (a) strengthened aquatic animal-health certification procedures for aquatic animals and products that are exported internationally and require attestations by the national competent authority in line with the Aquatic Animal Health Code of the World Organization for Animal Health (OIE), additionally augmented regulations for the import and movement of aquatic animals and products, and establishment of quarantine facilities using green designs and geolocation to be resilient against sea level rise, within the premises of all international ports and airports; including establishment and operation of the requisite quarantine equipment and recruitment of trained human resources, especially women; and (b) establishment of a network of disease surveillance laboratory network including construction using green designs to be resilient against sea level rise, and equipping such laboratories and recruitment and training of service providers, majority of them women, for operation and management of such laboratories. In each of these, experience-exchange will take place with SWIO countries for development of regulations, standards and protocols that upheld adaptation and resilience in the fisheries sector. Maldives will also support on-the-job training for fisheries sector specialists (with background in fisheries sciences, especially on fish pathology) from SWIO countries in each of these laboratories and quarantine facilities.

Subcomponent 2.3: Skill and Capacity Building for Supporting Enterprise Development in Fisheries Sector (US\$12.63 million).

This subcomponent would include: (a) establishment of an ‘economic and export market research division’ and its staffing, majority being women, in the MoFMRA to carry out research on export markets including consumer preference in niche markets, research on suitable product specification and standards including climate-resilient handling and storage, and provide regular such market intelligence to the sector enterprises in Maldives and SWIO countries; (b) facilitation of independent certification schemes and branding for sustainable, resilient, clean and low-carbon “Maldivian’ products in international markets; (c) facilitating specialized training in priority areas identified in Maldives in collaboration with SWIO countries and complementing the SWIOFC implemented training and mentoring including on-the-job mentoring (as in subcomponent 1.1); (d) business skill training for home-based women involved in home-based enterprises in fish and other food products; (e) rolling-out, including training of teachers, of an undergraduate education program in sustainable, climate-resilient ‘fisheries, food sciences and business management’ in Maldives in partnership with Maldives National University who in turn will collaborate with reputed global knowledge institutions/universities. The program will be designed so that students can leave after a year with a certificate, after two years with a diploma, or continue to complete the undergraduate program. The courses will be offered at *Viligili/Male* and four regional campuses of the Maldives National University. To start with, the intake will be 60 students per year, a majority of them girls/women, well within the absorption capacity of the sector enterprises in Maldives; and will offer 6 scholarships per year for officials and students nominated by SWIO countries; and (f) repair and renovations of the MoFMRA training facilities located in the *Viligili* Island to be used as a campus for the undergraduate education program and equipping the training centre at Maniyafushi to be used for ‘practical’ training as part of such undergraduate education program. Renovations will also involve green designs including building above the expected sea level rise.

Subcomponent 2.4: Augmentation of Project Management Capacity of MoFMRA including Building Capacities for Enhanced Regional Cooperation (US\$3.91 million).

This subcomponent would provide equipment, technical assistance, training, and incremental operating cost to strengthen the overall administrative capacity and capability of the Ministry of Fisheries, Marine Resources and Agriculture (MoFMRA) for implementing programs and projects financed by multilateral and bilateral donor agencies, through establishment and operation of the Corporate Program Management Department (CPMD). The CPMD will also implement, and monitor project activities, including the project’s fiduciary and environmental and social standards requirements. The CPMD will include specific staff and resources for regional cooperation, collaborate with SWIOFC, and during implementation of the project will coordinate with RPMU/IOC, especially with respect to reports on implementation progress and evaluations.

Component 3: Enhanced Competitiveness and Private Sector Participation in Maldives for improving Business Climate for Fisheries in Maldives and the Southwest Indian Ocean Region (Cost US\$82.68 million, to be implemented by MoFMRA/Maldives; IDA Grant US\$12.96 million, IDA Credit US\$12.96 million, and Private Capital Mobilization US\$56.76 million) (GCRF Pillar 2)

This component addresses the regional need to demonstrate and share experiences to progressively remove barriers to a competitive business climate for Fisheries in SWIO countries. Based on the demonstrations and lessons learnt, SWIO countries will also prepare national plans and programs for leveraging private sector finance in their respective national plans in collaboration with the RCEs (established/augmented through subcomponent 1.1). Maldives, on their own, have challenges of inadequate private investment and absence of substantial credit in the sector. Past development of fisheries sector had been dominated by public financing and creation of public assets, and inefficiencies have cropped up. Two simultaneous set of actions are needed: promoting small and medium enterprises to take larger roles in the sector, and a simultaneous transition away from public ownership of fisheries sector infrastructure and assets which are meant to raise commercial returns/revenues. This component will complement the proposed “Maldives Competitiveness and Growth Project” (MCGP, P179286), and will use the additional financial/credit mechanisms provided by the MCGP for specific application in the fisheries sector. Accordingly, this component will have the following subcomponents

Subcomponent 3.1: Decarbonization of the Fisheries Sector (IDA Grant & Credit US\$6.87 million, Private Capital Mobilization US\$3.97 million).

Decarbonization in Maldives will facilitate adopting a GRID approach to future development and growth of the fisheries sector, which by reducing the cost of inputs (energy, fish feed), and using circularity in production systems will improve profitability of business enterprises in the sector. Interventions toward decarbonization in Maldives will be beneficial to SWIO countries as these enhance positive externalities, address shared regional public goods, address common constraints with respect to reducing the cost of fishing, consequently allowing higher value addition, and lowering the pressure on fishing of coastal fishery resources. This subcomponent would include: (a) technical assistance for the following: (i) carrying out unit-level energy-efficiency (EE) and GHG audits followed by implementation of EE/GHG reduction services and preparation of bankable business plans for fisheries sector enterprises in the entire value chain; (ii) unit-level assessments and preparation of business plans for promotion of circular economy including waste management and reduction of fish losses, (iii) assessment of the performance of the fish aggregating devices (FADs) in providing appropriate intelligence to the fishing fleet for targeted fishing, relocation of these devices to minimize travel (and fuel-use) for fishing, (iv) assessment and planning for installation of refrigerated sea water systems (RSW) on-board about 300 fishing vessels, and installation of up to 32 new FADs for fishing and 17 specialized FADs for recreational fishing. Apart from commercial information (if available) from unit-level audits, all information will be consolidated and shared with SWIO countries to facilitate decarbonization and adoption of circular fisheries sector economy to be mainstreamed in their own respective country fisheries sector management plans and programs; (b) matching grants, with an additional allocation towards job creation for and ownership by women, will be provided to each of the eligible enterprises for: (i) implementing the aforesaid bankable business plans for EE/GHG reduction, installation of bait fish tanks in up to 780 fishing vessels; (ii) implementing energy-efficiency and GHG-reducing measures prorated to the amount of CO₂e emission avoided on complete implementation of the actions; (iii) reducing wastage including reducing fish loss by small fishery sector enterprises, (iv) start-up circular fishery sector businesses using fish waste in production of marketable products, and (v) fuel-switch for greening of fishing vessels. Matching grants would be used in a manner such as to maximize leverage from the use of project funds; (c) installation of low-cost tracking systems to minimize loss of FADs, pilots to demonstrate feasibility of use of green hydrogen to power the fishing vessels, use of deep-sea cold water to chill fish using RSW. All performance reports will be consolidated and shared with SWIO countries; and (d) reimbursement of salaries of officials and business enterprises nominated by the SWIOFC countries for ‘on the job’ training in the fishery sector enterprises, including in units promoting circular economy and value chain efficiencies. Additionally, annual on-location exposure visits will be organized for teams recommended by the SWIO countries.

Subcomponent 3.2: Diversification/Expansion of Fisheries Sector through Facilitating Small and Medium Enterprise Businesses (IDA Grant & Credit US\$19.05 million, Private Capital Mobilization US\$52.78 million).

To conserve the coastal fish stock and to avoid future increase of harvesting of fish that may result in depletion of fish stock in the SWIO region, it is essential to support a green and resilient transition of the private sector enterprises

in the sector. Such a transition in Maldives will involve facilitating growth from value addition, rather than increased capture of fish and other marine resources, emphasis on mariculture and diversification of the sector enterprises. These investments in Maldives will help transitioning the other SWIO countries where the social and economic return from coastal fisheries is low, by: (a) enhancing the positive externalities, especially related to resilient and sustainable harvesting of the regional coastal fishery resources, (b) address the common challenges of weak business climate and facilitate appropriate planning for generating larger social and economic benefits in favor of relatively poor coastal communities in SWIO countries, and (c) upgrade value chain linkages by helping the fisheries sector businesses in the SWIO countries integrate into more competitive value chain through increased uptake of harmonized food and quality standards, energy- and GHG-efficient technologies, and market expansions, and (d) creating enabling regional environments for the improvement of the sector by rapid uptake of appropriate models for facilitating larger private sector participation toward resilient businesses in these countries that will reduce losses, wastage, excessive harvesting of regional coastal fishery resources. This subcomponent would include: (a) technical assistance for preparation of bankable business plans for leaseholder small enterprises in 54 uninhabited islands for development of sustainable and integrated mariculture, aquaculture, aquaponics, hydroponics, and agroforestry. These business plans will mainstream climate resilience, ‘zero discharge’ of effluents and wastes into the sea, ‘zero emission’ farm practices, use of renewable energy such as off-grid solar power, and ‘good aquaculture practices’; (b) matching grants to facilitate implementation of the aforesaid business plans. The MoFMRA will also ease the island leasing policy extending the tenure of the leases from the current 15-21 years to 35-50 years, such that the lease agreements could become relatively more valuable as a collateral for accessing commercial credit; (c) technical assistance and financing up to 30 percent of capital investment to 2 small or medium enterprises to be set up with private sector management control for establishing fish processing and canning facilities of capacity 25-50 tons per days in the Southern Atolls, and technical assistance for a similar investment in a combined multispecies hatchery and mariculture production facility at *Ga. Maanagalaa*. These investments will be selected through a design-build-finance-operate-maintain and transfer (DBFOMT) concession; (d) reimbursement of the cost of procurement of product quality certifications acceptable to MoFMRA; (e) additional grants to the above-described small and/or medium enterprises prorated to agreed level of employment of women, and to accommodate candidates from SWIO countries under an “apprenticeship program” agreed bilaterally with Maldives; and (f) preparation of a Roadmap for Expanded Private Sector Participation. This road map would be based on: (a) an assessment of the level of use and efficiencies of fisheries sector infrastructure and assets already created by public finance, such as fish landing centers, jetties, ice plants, and explore options for their efficient use; (b) prepare liability statements including retrofitting resilience and good environmental practices for all such assets and infrastructure, including sunk/abandoned ones, found desirable to be renovated and reinstated; (c) preparation of roadmap including legal and regulatory framework for inviting private sector ownership of these facilities, including through public-private partnership (PPP) models considering the optimum methods to distribute the liabilities assessed; (d) undertake analyses related to restructuring/reform options for the Maldives Industrial Fisheries Company (MIFCO) considering a balance between its commercial objectives and social functions (of ensuring a fair share of prices for the fisherpersons). These analyses will support implementation of the recommended reforms through the MCGP; and (e) share the roadmap, plans and PPP options to investors including additional credit-linked grants for potential investors from SWIO countries.

2.2 Project Beneficiaries

At the SWIO region level, member countries and national fisheries-related institutions in the SWIO will directly benefit from (a) relevant knowledge and skills to assess status of fisheries and to develop and manage sustainable fisheries, (b) critical mass of regional experts on central subjects on fisheries and ecosystems policy and management and (c) coordinated development, implementation and monitoring of policies on fisheries development and management and the sustainable use of marine and coastal ecosystems in the region. The increase in capacity at the individual and institutional level (including through faster exchange and sharing of experience and knowledge and a more harmonized policy and regulatory framework) promoted by the project will allow fisheries institutions to discharge their responsibilities more efficiently and with much more sustainable prospects, turning each national initiative into a positive externality to the other Members, creating the conditions for a regionally and nationally sustainable fisheries research and management system, with gender equity, that can support effectively the development of the fisheries sector while safeguarding the sustainability of the resource base and of the ecosystems that support it.

Project beneficiaries will include individuals and families involved in fisheries and related diversification activities

in Maldives, government institutions and the private sector, who will receive support for improved access to institutional credits, technical advisory and matching grants from the project. Individuals in the SWIO region, especially women among the small-scale fishers will receive training on enterprise development for mariculture. They will also be nominated by individual fisheries related institutions in SWIO countries for capacity building exchanges with Maldives including apprenticeship programs in the enterprises in Maldives receiving matching grants, and the undergraduate education program in Maldives.

Individuals, especially women in remote atolls will be prioritized, and specific gender actions will be implemented. Fishers and fishing families/households and the people employed/engaged with formal and informal private sector including small enterprises engaged in fishing, fish processing and related fisheries sector value chains, or interested expanding diversification in activities such as mariculture, aquaponics, hydroponics, or agroforestry and in their relevant supply chains and value chains will benefit directly from the project or its results. All components of the project not only will ensure women's equal access to project benefits but will also provide additional emphasis for job-oriented skill development for women, job creation for women, and/or enhancing ownership of women in the sector enterprises, especially for all enterprises receiving matching grants from the project. Each component and subcomponents will have specific targets related to these aspects of gender actions. The project will promote enterprise development in remote atolls away from Male, and thereby address the important issue of inclusion, as far as new jobs in the sector is concerned.

Government institutions in Maldives. The main beneficiaries of the project include: MoFMRA and its affiliated agency, the Maldives Marine Research Institute (MMRI) and the Maniyafushi Mariculture Research and Development Facility (MMRDF). The project will support establishment of: (a) the 'Biosecurity Division' and (b) the 'Economic and Export Market Research Division' of the MoFMRA including staffing of these divisions, a majority of whom will be women. The project will also support establishment of the Corporate PMU of the MoFMRA, which other than implementing this project will also be responsible for implementing all other programs and projects financed by multilateral and bilateral donor/financing agencies. Apart from these, capacity augmentation including support for expansion of capabilities for efficient public administration and service delivery will be provided across all divisions of the MoFMRA, notably for improved extension services including skill trainings for relatively newer areas of mariculture, aquaponics, hydroponics and agroforestry. The undergraduate education program including support for the proposed campuses at Viligili and Maniyafushi island will enhance the capacity of the Maldives National University including its four regional campuses.

Private sector in SWIO Region and Maldives. The private sector engaged in fishing-related activities in SWIO region will particularly benefit from more stable and regionally harmonized policies and regulatory framework that lead to a more predictable business environment and thus facilitates and support investment in the sector. Better managed fisheries will also lead to an increase in value-added in the sector and more stable production, allowing the creation of more stable and better-paid employment for a large number of people in the sector, particularly women and youth engaged in fish processing and marketing. In Maldives, the small and medium enterprises will receive TA and matching grants for (a) improving efficiencies of their enterprises including decarbonization of their value chains, and (b) expanding their production including expansion of their workforce especially among women. They will also benefit from improved governance systems, policy reforms and program support with respect to biosecurity, government facilitation of export market intelligence, and policy reforms related to tenure of leases of uninhabited islands to ease access to credit.

3. Potential Social and Environmental Impacts and Risk

Based on the project components, the overall risks of the project will be Substantial. In terms of physical interventions, the project will involve civil works such as renovation of training facilities, management of construction waste and disposal of waste water discharge from animal quarantine facilities, and disease surveillance laboratories, end-of-life disposal of electronic wastes, solar panels and batteries used for energy efficiency, clearance on land cover and potential destruction of habitat during the installation and operation of income diversification activities in uninhabited islands, especially 'mariculture' that can result in the release of excess feeds leading to eutrophication, even if use of antifouling chemicals and antibiotics are avoided, and while no land acquisition is expected, limited community health and safety, occupation health and safety risks to workers and potential exclusion of vulnerable and marginalised groups, including women are considered for mitigation. The procurement, use, and disposal of this equipment will lead to the generation of E-waste at the end of their lifecycle that will have to be

managed via protocols and arrangements to ensure that sound management is undertaken in line with the regulation of the Maldives Waste Management Department, Environmental Protection Agency, and follows Good International Industry Practice (GIIP) including requirements of ESS3.

Before any building works are undertaken, the project will assess and seek to safeguard, and mitigate, any risks to children. Preparation of construction work plans will be done in consultation with relevant island councils, government authorities, island communities and beneficiaries to minimise disturbances to the nearby communities. Furthermore, contractors will implement strict health and safety protocols including ensuring that workers are vaccinated, adhere to a work place code of conduct.

Furthermore, the national elections are expected to be held on September 2023 (Presidential elections) and April 2024 (elections to the Majlis, the national parliament), and political situation in Maldives remain unpredictable. Despite the political uncertainties, there is general agreement among the current ruling and the opposition coalitions about importance of the fisheries sector in general, and the need for growth within a sustainable management framework. However, there might be debates about the choice of locations of fisheries sector regulatory infrastructure (such as quarantine facilities) or locations of processing plants that might be supported through a DBFOMT arrangement. Wide stakeholder consultations including agreement with atoll councils for such activities are therefore important and will be pursued.

Due to the nature of associated Substantial risks and scale of project interventions, the sub-project specific ESF instruments have been identified in the Environmental and Social Commitment Plan (ESCP) which intensifies actions to be undertaken with regards to environment and social standards as well as agencies responsible for implementing various activities listed in the ESCP. ESF instruments to be prepared include: ESIA, EMP, Labour Management Plan (LMP), Occupational Health and Safety Management Plan (OHSMP), Community Health and Safety Plan (CHSP), and Stakeholder Engagement Plan (SEP). A Grievance Redress Mechanism (GRM) will be included in the LMP to specifically address workers' rights and concerns. The SEP will also provide a GRM which can be utilized by impacted persons and the general public. All ESF documents will be disclosed by the GoM and the World Bank on 19th March 2023

The extent of labour needs will be with regards to civil and renovation works. Although contractors would be encouraged to hire locally, in order to accomplish renovation, it is expected a small, temporary influx labour will be needed. As such all contractors and workers will be subject to Labor Management Plans, workers' rights, health and safety measures, and code-of-conduct clauses. Additionally, workers and local communities will be educated in gender equality and prevention of harassment and violence and informed on GRM responsive to SEA/SH. The World Bank risk tools have assessed a low risk level for SEA/SH

The coordination activities in the MoFMRA will be assisted by a team, it is proposed to recruit or secondment of qualified Environmental and Social Specialist along with the project effectiveness that will manage oversight of ESF implementation. The Government of Maldives has gained experience in the World Bank- financed projects through its successful implementation of several other projects under the ESF and will benefit from the support of the Bank's E&S specialists in further enhancement of E&S management in projects. Some of the E&S staff of ongoing projects has already received ESF training as part of the project; additional training will be carried out with all stakeholders once the E&S staff is recruited.

4. Project Implementation Arrangements³

The overall in charge of the project is MoFMRA, where the project will be implemented through its institutions, such as Maldives Marine Research Institute (MMRI), Hanimadhoo Agriculture Centre, and Villimale' Training Facility and Aquatic Animal Health Facility, and Plant Protection, Quarantine Services, Mariculture Research and Training Facility and Multi-Species Hatchery. These institutions will implement the activities of the project in line with the respective mandates and responsibilities. All these agencies have experience of working with and successfully implementing Bank financed projects. The coordination activities in the MoFMRA will be assisted by the Project Management Unit (PMU) consisting of a small team of full-time staff with experience in project management and monitoring, procurement, financial management, and environmental and social safeguards. The

³ Based on the Draft Project Appraisal Document for Transforming Fisheries Sector Management In South-West Indian Ocean Region and Maldives Project

project will have a steering committee, chaired by the Minister of Fisheries, Marine Resources, and Agriculture and comprising of projects components coordinators, to facilitate project implementation at the policy level. The Ministry will be assisted by its other institutions.

Moreover, the project has a regional component (Component 1) which will be implemented by IOC with technical assistance agreement with SWIOFC. The SWIOFC, as the regional fisheries body, is the existing platform for regional dialogue and cooperation on fisheries management and development. The IOC, being a regional leader in fisheries and marine environment with strong internal capacity for project management, and having successfully implemented regional Bank and other donor-funded projects, has been chosen by the member countries to support project implementation, until such time as this responsibility can be taken over by the SWIOFC.

The SWIOFC will act as the back-end technical support unit to the IOC, support the RPMU on project implementation, perform ongoing project monitoring and reporting, and provide training and capacity building to SWIO countries. The SWIOFC will designate its Commission as the RPSC for the component within 30 days of project effectiveness. The RPSC will meet periodically (at least twice a year, one of them back-to-back with the Commission's meeting) to review project progress as reported by the PMU and provide guidance on the plan of action for the next period. The RPSC will provide overall leadership and guidance to the project on implementation and will support policy dialogue with countries for regional integration. FAO will establish a Technical Implementation Support Unit (TISU), including a Technical and Scientific Adviser and a Programme Officer, and supported additionally by the SWIOFC Secretariat, within 90 days of project effectiveness to support IOC in implementing the project.

A RPMU will be established within IOC to provide day-to-day project operation and supervision. The RPMU will be led by a Project Manager, and will also include a full-time Administrative Assistant, and a part-time procurement specialist. Other specialists (e.g. M&E specialist) may be contracted for specific tasks and responsibilities on an as-needed basis. The RPMU, with the support of FAO, will collect and present data and reports for periodic reviews by the RPSC in collaboration with the World Bank. The RPMU will (a) provide overall project oversight and supervision; (b) monitor the project activities' compliance with various operational policies and procedures, including the Environmental and Social Standards (ESS), procurement, and FM and address potential noncompliance, with support from FAO; (c) carry out project implementation of all activities under the technical and scientific leadership and support of FAO; (d) perform project monitoring and reporting with FAO's support; and (e) coordinate communication among the RPSC, FAO and the World Bank, with support from the SWIOFC Secretariat and FAO. The RPMU staff will work closely with FAO and SWIOFC Secretariat and seek their support and advice on all technical and scientific issues, as well as on other issues as needed.

5. Objective of The Stakeholder Engagement Plan

The Stakeholder Engagement Plan (SEP) is prepared for the Transforming Fisheries Sector in Maldives and Improved Cooperation for Sustainable Fisheries Resources in Southwest Indian Ocean Project (P179242) in accordance with the requirements of the World Bank's Environmental and Social Framework (ESF) and in particular with the Environment and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure. Stakeholder engagement refers to a process of sharing information and knowledge, seeking to understand and respond to the concerns of potentially affected or impacted individuals and groups, and building relationships based on trust. Therefore, stakeholder engagement is important for successfully addressing the environmental and social risks and impacts of the project.

The purpose of the present SEP is to explain how the various stakeholders relating to the project will be engaged throughout the project lifetime and which methods will be used as part of the process. The SEP also outlines the responsibilities of the project implementing partners, PMU, and other regional partner agencies in the implementation of stakeholder engagement activities, including the ways in which the agencies will communicate with stakeholders; the mechanism by which people can raise concerns; provide feedback; and/or make complaints about the PMU, other implementing partners and the project itself. Furthermore, the SEP will ensure that a consistent, comprehensive, coordinated and culturally appropriate approach to engagement will be undertaken for the project and for addressing environmental and social risks and impacts and that the approach fulfils all relevant legal and regulatory requirements of the Republic of Maldives and is aligned with World Bank's ESF. The involvement of the relevant stakeholders is essential for the success of the project to ensure smooth collaboration

between project staff and other stakeholders including project beneficiaries to minimize and mitigate environmental and social risks related to the proposed project activities. SEP will identify stakeholders and mechanisms through which they will be included in the engagement process as part of project preparation and implementation and will serve as a record for the engagement process during the project preparation period.

A GRM will be established as a part of project activities. Within the GRM, gender-sensitive measures will be put in place to address GBV or SEA/H reported cases. The project GRM will be included in ESMFs and Stakeholder Engagement Plans and accessible to all project affected persons and stakeholders. Labour Management Plans will include a GRM which focuses on Contractor, laborers, and workers' rights.

The SEP prepared and to be implemented by the PMU, includes: description and overview of the project, including environmental and social risks and impacts; national and World Bank requirements on stakeholder engagement, information disclosure and consultations; summary of stakeholder engagement activities already organized under the project; stakeholder identification and analysis; proposed stakeholder engagement program for the project; roles, responsibilities and resources for the stakeholder engagement program; description of the range of information to be communicated to stakeholders and the methods to be used for stakeholder consultation at each stage; project grievance redress mechanism; and monitoring and reporting requirements for the SEP.

6. Regulations and Requirements

6.1 National Requirements

The Article 29 of the Maldivian Constitution adopted in 2008 states that everyone has the freedom to acquire and impart knowledge, information and learning. In order to fulfil this requirement of the constitution, there are several national legislations and regulations which require stakeholder engagement. The most relevant legislation for the engagement of the stakeholders in the Maldives is Right to Information Act (Act no: 1/2014). Other significant legislation includes Local Government Act (Act no: 24/2019). The following are description of the aforementioned legislations particularly the articles pertaining to the stakeholder engagement requirements.

6.1.1 Right to Information Act (Act no: 1/2014)

The Right to Information Act was ratified in 17th January 2014. The Act established an independent office of Information Commissioner who receives complaints, is mandated with ensuring compliance of the law, collecting information, conduct inspections, and investigations. The following are the most relevant articles for stakeholder engagement;

- Under article 4 of Right to Information Act [1/2014], require everyone who requests for information is entitled to the access of such information in accordance with the law.
- Article 07 of the law specifies the procedures for requesting for and disclosure of information from and by State institutions. Information must be disclosed within 21 days of request. An institution may extend the period for 14 more days, if the requested information is of (a) a large quantity, or (b) extensive research is required to collect and disclose the information, or (c) where the work needed to disclose such information would substantially hinder the normal operation of the State institution. Information needed urgently to prevent a threat to life or freedom of a person must be disclosed within 48 hours at most. Upon failure to disclose the information within the periods stipulated, the law deems such requests have been denied.
- As per article 22 the state is not required to disclose information which, if disclosed would amount to an offense under law, or information if disclosed could cause legal action against the government for breach of confidence or which could prevent the government from receiving similar information in the future. Furthermore, State institutions could withhold information, which if disclosed could affect the government's ability to manage and administer the economy of the country and information if disclosed prematurely could have a negative impact on a person or a group of people. The state can further withhold information that harms the immunities of the courts and the parliament, information from a closed court hearing and information that reveal details related to a minor, and victims of sexual abuse.
- Articles 11 and 42 of the Act, further obligates an Information Officer in every office to attend to requests and is mandated with submitting an annual report to the Information Commissioner.

6.1.2 Decentralization Act (Act no: 24/2019)

Key amendments were brought to the initial Local Government Act (Act no: 4/2010) which was ratified on 17th March 2010. However, this section will enlist the most recently amended Local Government Act (Act no: 24/2019) which was ratified on 15th December 2015. The local government act is implemented by Local Government Authority (LGA) which was established under the Act. The following articles are most relevant for the stakeholder engagement requirements;

- As per article 68 of the act for any development project undertaken in an island consultation needs to be undertaken with the council and other relevant authorities established in the island. The same article also states that any EIA reports developed for any project needs to be shared with the council and information on the impacts and mitigation measures should be shared with the council.
- As per article 107-1 of the act the council should hold meetings with the public regarding any important development activities undertaken in the island. The same article also specifies that the time and location of the public meeting should be announced 05 days prior to the meeting.
- As per article 56-6 of the act a Women's Development Committee should be established. The members of the committee should be elected based on an election held amongst the women of the community. As per article 56-7 of the act one of the functions of the committee is to give input to the council regarding various development activities undertaken within the island.

6.2 World Bank Requirements

The World Bank's Environmental and Social Framework (ESF), Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" (WorldBank,2017:97). Specifically, the requirements set out by ESS10 are the following:

- Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation. The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (1) stakeholder identification and analysis; (2) planning how to engagement with stakeholders will take place; (3) disclosure of information; (4) consultation with stakeholders; (5) addressing and responding to grievances; and (6) reporting to stakeholders.
- The Borrowers will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was considered, or the reasons why it was not (World Bank, 2017: 98).

6.3 Stakeholder Engagement Plan and Disclosure

This SEP was consulted with key implementation partner and disclosed publicly on 19th March 2023, prior to end of project appraisal. The objective is to establish a systematic approach for stakeholder engagement, maintain a constructive relationship with them, consider stakeholder' views, promote and provide means for effective and inclusive engagement with project-affected parties throughout the project lifecycle, and ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner. The project will set up project-specific Grievance Redress and Feedback Mechanism for people to report concerns or complaints if they feel unfairly treated or are affected by any of the sub-projects.

The underlying principle of stakeholder engagement for the project will be that engagement shall be a) free of manipulation, and b) free of interference, coercion, and intimidation, and conducted based on timely, relevant, understandable and accessible information, in a culturally appropriate format. It shall involve interactions between

project’s stakeholder and shall provide stakeholders with an opportunity to raise their concerns and opinions and shall ensure that this information is taken into consideration when designing the project and making decisions.

This SEP is a living document and will be updated throughout the project lifecycle. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank, 2017:99). According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievance of the project-affected parties related to the environmental and social performance of the project in the timely manner (World Bank, 2017:10).

The structure of the stakeholder engagement plan will be as follows:

- Stakeholder Identification and Analysis
- Stakeholder Engagement Program
- Grievance Redress Mechanism
- Monitoring and Reporting

7. Brief Summary of Previous Stakeholder Engagement Activities

For the purpose of project identification and preparation, the Ministry of Fisheries, Marine Resources and Agriculture and the World Bank team engaged with several key stakeholders. The following Table 1 provides a list of all the stakeholders consulted during the project identification and formulation stage. During stakeholder consultations, a number of issues, gaps and challenges in the fishery sector in the Maldives were identified, and suggestions and recommendations of the stakeholders were elicited. The key outcomes of these consultations together with the details of the stakeholders are presented in Table 1 below.

Table 1. Stakeholder engagement during project preparation

Venue and Date	Stakeholders Consulted	Key issues/challenges & assessment of status	Suggestions & Recommendations
Government Institutions			
Venue: At the relevant Ministries Date: 23 rd August 2022, 24 th August 2022, 25 th August 2022, and 9 th January 2023	<ul style="list-style-type: none"> • Ministry of Finance • Environment Protection Agency • Ministry of Environment, Climate Change and Technology 	<ul style="list-style-type: none"> • Projects’ objectives and targets not fulfilled to the satisfactory level at the end of the project. • Proper communication mechanisms are not practiced in the formulation and decision stage of projects • Absence of monitoring mechanisms • Important information not being disclosed effectively. 	<ul style="list-style-type: none"> • Ministry of Environment and EPA to be informed of the decisions relate to environment and island selection. • Enforce a robust monitoring and reporting mechanism throughout the project • Share meeting minutes and other project related documents for comments and feedback
Commercial Banks and Financial Institutions			
Venue: Ministry of Fisheries, Marine Resources, and Agriculture Date: 26 th August 2022	<ul style="list-style-type: none"> • Bank of Maldives • Commercial Bank of Maldives • Islamic Bank of Maldives • State Bank of India • SME Development Finance Corporation 	<ul style="list-style-type: none"> • Borrower behaviour towards financial disciplines – Making project expenses without proper assessments and need • Finances not monitored and documented properly • Borrowers not meeting their commitments to the bank 	<ul style="list-style-type: none"> • SMEs and Banks to work closely and manage their bank accounts • Establish a formal document which specifies the structure of SME businesses and business models • Assist SMEs to create a business model around what they do

		<ul style="list-style-type: none"> • Difficulty of recovering loans • Difficulty to provide mortgage for vessels • Lengthy Court processes to recover loans 	
Agriculture related Private Companies			
<p>Venue: Ministry of Fisheries, Marine Resources, and Agriculture Date: 27th August 2022</p>	<ul style="list-style-type: none"> • Siyaha Maldives • Sase Construction Pvt Ltd • Maarikilu Pvt Ltd • Sandy Crystal Pvt Ltd • Voyages Maldives Pvt Ltd • Seagull Group Pvt Ltd • Aarah Investment Pvt Ltd 	<ul style="list-style-type: none"> • Lack of access to credit – problems with cashflow • Changes in the environment / climate change • Pest infestations • Over use of chemical fertilizers • Export requirements are too stringent and unreasonable. • Lack of investment capital 	<ul style="list-style-type: none"> • Banks to provide loans for businesses working in the agriculture sector • Invest in climate adaptation programs and measures • Create new measures for pest control in an environment friendly manner • Enforce legal requirements on the application of chemical fertilizers on crops
Fisheries related Private Companies			
<p>Venue: Ministry of Fisheries, Marine Resources, and Agriculture Date: 27th August 2022</p>	<ul style="list-style-type: none"> • V.K.M Investments Pvt Ltd • Horizon Fisheries Pvt Ltd • Ensis Fisheries Pvt Ltd • Maldives Industrial Fisheries Company 	<ul style="list-style-type: none"> • Lack of access to credit – problems with cash flow • Competition between MIFCO and other private companies leaves them at a disadvantage • Price flow – Price of fish in Maldives remains high though the market price is low worldwide • MIFCO selling raw fish to Thailand instead of Private companies • Low storage capacity • Lack of investment capital 	<ul style="list-style-type: none"> • Establish a Fisheries bank to give loans for the sector • Government and Private sector to reach an agreement with regards to selling raw fish to private sector instead of other countries • Introduce legal measures for price control • Provide funding to increase storage capacity of fish • Better arrangements to attain loans for fish production and export
Mariculture related Private Companies			
<p>Venue: Ministry of Fisheries, Marine Resources, and Agriculture Date: 27th August 2022</p>	<ul style="list-style-type: none"> • Boduhaikodi Pvt Ltd • Step Maldives Pvt Ltd • Big Fish Maldives Pvt Ltd 	<ul style="list-style-type: none"> • High investments needed for start ups • Low participation/involvement of women • Banks reluctance to give loans for fisheries sector • Difficulty to get into the International Market • Lack of awareness about alternate sustainable means for fisheries • Lack of awareness among the island communities to 	<ul style="list-style-type: none"> • Loans for Sustainable Fisheries • Loans focused on women of island community for start-ups. • Reach an arrangement with Banks for loans and Grants opportunities • Create a platform for easy access to the international market • Awareness programs for women and fisher communities

		create their own business through the sector	
Non-Governmental Organizations			
Venue: Ministry of Fisheries, Marine Resources, Agriculture Date: 27th August 2022, 9th January 2023	<ul style="list-style-type: none"> • Parley Maldives • Journal 	<ul style="list-style-type: none"> • Bad practices used in Pole and Line Fisheries • Low participation of women in the sector • Lack of awareness on business ideas and entrepreneurship 	<ul style="list-style-type: none"> • Set up Hatcheries for Bait fish culture • Promote programs for women empowerment • Introduce legal measures against unsustainable behaviour in catching bait fish

7.1 Lessons Learned from Previous Consultations

The World Bank has several Fisheries sector development projects in the Maldives both in the past and the present, including Sustainable Fisheries Resources Development Project (SFRDP). The project has/have various categories of stakeholders. Each stakeholder group brings with them unique requirements, concerns, values and responsibilities, and as such, need to be consulted and encouraged to participate proactively. Moving forward with the implementation of the Transforming Fisheries Sector Management in South-West Indian Ocean Region and Maldives Project, it is imperative that the GoM correctly identifies, rightly engage and responsibly address the inputs and concerns of all stakeholders.

During the preparation stage of project development, it is crucial to engage key stakeholders to identify most needed areas in fisheries sector to promote sustainable fisheries and improve relationship with SWIO. In this regard, engaging the Small and Medium Enterprises and Private Sector in continuous consultations is important for the successful implementation of the project.

The feedback received through the stakeholder consultations conducted, were addressed in the project formulation stage, including hiring of personnel responsible to establish proper information dissemination mechanisms, effective public outreach and monitoring. Component 3 of the project, specifically incorporates provisions for SME development and mechanisms to strengthen private sector involvement and contributions in the sector including, grants and loan opportunities for the fishery-based SMEs. The project design also includes proper implementation and monitoring of sector specific regulations and providing sufficient information on these regulations to the relevant stakeholders. Through the project, provisions have been included to strengthen equal opportunities for women, and women entrepreneurship development in collaboration with relevant NGOs and other interested parties for the cause.

7.2 Stakeholder Identification and Analysis

For the purpose of the SEP, stakeholders of the proposed Project will be divided into the following core categories: (1) Project-affected; (2) other interested parties; and (3) vulnerable groups (Table 2). Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholders toward the successful implementation of the project and will enable the project to draw on their pre-existing, expertise, networks, and agenda. It will also facilitate both the community's and institutional endorsement of the project by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

Table 2: Stakeholder Identification and Classification

Project affected parties	Other Interested Parties	Disadvantaged and Vulnerable groups
Individuals and families involved in fisheries and related diversification activities in Maldives	Island Councils of targeted islands	Poor fisher families who may not have the minimum assets to access the project benefits
Fisher families engaged with formal and informal private sector including small enterprises in fishery and related diversification activities in remote atolls in Maldives	National fisheries related institutions in the SWIO region	Women headed fisher households who may not be able to participate in the project such as skills development trainings due to household burdens
Fisher women engaged with formal and informal private sector including small enterprises in fisheries and related diversification activities in remote atolls in Maldives	Individual small-scale fishers in the SWIO countries	Small and medium enterprises which may get excluded from the participation in the project activities due to their limited capacities, resources and their geographical location (remote islands/atolls)
Small and medium enterprises engaged in fish processing and fishery related diversification activities	-Women fishers in the SWIO countries	Fishermen who are illiterate or with low literacy who could be excluded for skills development trainings and exchange programs with Maldives
Private sector engaged in fisheries related activities	Ministry of Fisheries Marine Resources and Agriculture (MoFMRA)	Unrecognized workers (People where their work is left unrecognized)
Women and youth engaged in fish processing and marketing	Maldives Marine Research Institute (MMRI)	
Male and female staff of MoFMRA, MMRI and MMRDF	Mariyafushi Mariculture Research and Development Facility (MMRDF)	
Campuses to be established at Viligili and Maniyafushi	Maldives National University and its four regional campuses	
Maldives Industrial Fisheries Company (MIFCO) with new policy reforms and re-structuring	Private sector engaged in fishery related activities in the SWIO region	
Owners of fishing vessels whose vessels will be installed with new technological devices	UN- Food and Agriculture Organization (FAO)	
Leaseholder small and micro enterprises to be established in 54 uninhabited islands	Indian Ocean Commission (IOC)	
Students (60) who would be chosen from SWIO countries to follow fishery related undergraduate courses and receive scholarships	South-West Indian Ocean Fisheries Commission (SWIOFC)	
Students and officers from SWIO countries who would be	Regional Project Management Unit (RPMU)	

nominated for apprenticeship programs in Maldives		
Teachers of undergraduate programs who will receive capacity development training	Women Development Committees in Islands	
	Non-Governmental Organizations working with fisher communities	
	Media	
	Commercial Banks	
	Environmental Protection Agency (EPA)	

7.3 Project Affected Parties

“Affected Parties” are, persons, groups and other entities within the Project Area of Influence (PAI) there are directly influenced (actually or potentially) by the project and/or have been identified as being most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

Table 3 provides an assessment of the project’s risks and impacts on individuals, groups, local communities, and other stakeholders that may be directly or positively or negatively affected by the project. The assessment further extends to analyse the level of influence that these different stakeholder groups can exercise over the project preparation and implementation processes.

Table 3: Project’s impact on affected parties and their level of influence.

Project affected parties	Impacts	Influence
Individuals and families involved in fisheries and related diversification activities in Maldives	High	Moderate
Fisher families engaged with formal and informal private sector including small enterprises in fishery and related diversification activities in remote atolls in Maldives	Moderate	Moderate
Fisher women engaged with formal and informal private sector including small enterprises in fisheries and related diversification activities in remote atolls in Maldives	Moderate	Low
Small and medium enterprises engaged in fish processing and fishery related diversification activities	High	Moderate
Private sector engaged in fisheries related activities	High	High
Women and youth engaged in fish processing and marketing	Moderate	Moderate
Male and female staff of MoFMRA, MMRI and MMRDF	High	Moderate
Campuses to be established at Viligili and Maniyafushi	High	Moderate
Maldives Industrial Fisheries Company (MIFCO) to undergo policy reforms and restructuring	High	Moderate
Owners of fishing vessels whose vessels will be installed with new technological devices	Moderate	Moderate
Leaseholder small and micro enterprises to be established in 54 uninhabited islands	High	Moderate

Students (60) who would be chosen from SWIO countries to follow fishery related undergraduate courses and receive scholarships (54 students from Maldives and 6 students from other SWIO countries)	High	Moderate
Students and officers from SWIO countries who would be nominated for apprenticeship programs in Maldives	High	Low
Teachers of undergraduate programs who will receive capacity development training	High	Moderate

7.4 Other Interested Parties

“Other Interested Parties” constitute individuals/groups/entities that may not experience direct impact from the project but who consider or perceive their interest as being affected by the project and/or who could affect the project and the process of its implementation in some way. Table 4 presents the multiple interests of other parties and their level of potential influence over the Project.

Table 4: Interest of other parties and their level of influence over the project

Other interested Parties	Interest in the project	Influence
Island Councils of targeted islands	To provide the necessary approvals and facilitate the required resources for the effective implementation of the project and the development of the Islands’ fishery sector	High
National fisheries related institutions in the SWIO region	To acquire relevant knowledge and skills and harmonized policy and regulatory framework for sustainable management of fishery, marine resources and ecosystems and faster exchange and sharing of experience and knowledge	Moderate
Individual small-scale fishers in the SWIO countries	Acquire training on enterprise development for mariculture and fish diversification, and participate in capacity building exchanges with Maldives	Moderate
Women fishers in the SWIO countries	Acquire training on enterprise development for mariculture and participate in capacity building exchanges with Maldives	Moderate
Ministry of Fisheries Marine Resources and Agriculture (MoFMRA)	Efficient implementation of the project Expansion of their institutional structures, enhancement of staff capacities for efficient service delivery	High
Maldives Marine Research Institute (MMRI)	Contribute to the project implementation, expansion of their institutional structures, enhancement of staff capacities for efficient service delivery	Moderate
Mariyafushi Mariculture Research and Development Facility (MMRDF)	Contribute to the project implementation, expansion of their institutional structures, enhancement of staff capacities for efficient service delivery,	Moderate
Maldives National University and its four regional campuses	Enhancement of their institutional capacities and delivery of fishery related training programs	Moderate
Private sector engaged in fishery related activities in the SWIO region	Establishment of policies and regulatory framework for conducive business environment, support investments, improved governance systems and receive technical and financial assistance from the project	Moderate
UN- Food and Agriculture Organization (FAO)	To provide technical support for IOC for effective project implementation	
Indian Ocean Commission (IOC)	To support the effective project implementation	High

South-West Indian Ocean Fisheries Commission (SWIOFC)	To provide technical support to IOC and RPMU on project implementation, project monitoring and reporting, and provide training and capacity building to SWIO countries.	High
Regional Project Management Unit (RPMU)	To provide and support day-today project operation and supervision	High
Women Development Committees in Islands	To ensure women’s proactive participation in the project and acquiring benefits	Moderate
Non-Governmental Organizations working with fisher communities	To ensure that poor and vulnerable members of the fishing communities benefit from project interventions	Moderate
Media	To provide publicity to project interventions and report on issues and gaps	Moderate
Commercial Banks	To support financing the business plans for green-resilient SMEs	Moderate
Environmental Protection Agency (EPA)	To ensure that adverse environmental impacts are avoided/minimized by the project	High

7.5 Disadvantaged/ Vulnerable Individual or Groups

“Vulnerable Groups” are persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. They would include the following groups.

1. Poor fisher families who may not have the minimum assets to access the project benefits such as loans and matching grants
2. Women headed fisher households who may not be able to participate in the project such as skills development trainings due to household burdens
3. Small and medium enterprises which may get excluded from the participation in the project activities due to their limited capacities, resources and their geographical location (remote islands/atolls)
4. Fishermen who are illiterate or with low literacy who could be excluded for skills development trainings and exchange programs with Maldives
5. Unrecognized workers (People where their work is left unrecognized)

Providing access to information and encouraging their participation in consultations require special measures such as closer and focused screening of those vulnerable persons and institutions, face-to-face verbal communications, help desks etc. and financial support for their proactive participation and engagement in consultative meetings. Table 5 identifies the communication methods and resources required for the engagement of vulnerable persons and groups in the project.

Table 5: Engagement of disadvantaged/vulnerable groups/persons

Stakeholder Group	Key Vulnerability/disadvantage	Preferred means of notification/consultation	Additional Resources Required
Poor fisher families who may not have the minimum assets to access the project benefits	<ul style="list-style-type: none"> • Lack of tangible assets or collateral • Low literacy levels • Lack of access to modern communication modes and/or media 	<ul style="list-style-type: none"> • Access through Fisher Societies and NGOs in their community • House visits Face-to-face meetings and/or small group meetings • Individual phone calls 	<ul style="list-style-type: none"> • Financial support for their participation and for any loss of their livelihoods and incomes • Fisher societies and NGOs to encourage their participation and

	<ul style="list-style-type: none"> • Inability to forego their daily livelihoods and incomes • Inadequate financial resources to access relevant institutions and forums 		communicate information
Women headed fisher households who may not be able to participate in the project such as skills development trainings due to household burdens	<ul style="list-style-type: none"> • Limited mobility • Low/moderate literacy levels • Lack of access to modern communication modes and/or media • Inadequate financial resources to access relevant institutions and forums 	<ul style="list-style-type: none"> • Access through Women Development Committees (WDCs) and NGOs House visits • Face to face meetings and/or small group meetings • Through WDCs and relevant NGOs • Individual Phone calls 	<ul style="list-style-type: none"> • Financial support for their transportation • and for any loss of their livelihoods and incomes • Fisher organizations/societies, WDCs and NGOs to encourage their participation
Small and medium enterprises which may get excluded from the participation in the project activities due to their limited capacities, resources and their geographical location (remote islands/atolls)	<ul style="list-style-type: none"> • Do not have formal registration for their enterprises • Limited entrepreneurial/social networks • Excluded from receiving relevant information • Limited mobility due to their remote locations 	<ul style="list-style-type: none"> • Individual phone calls or Whatsapp messages • Approach via Island Councils/WDCs • Brochures, pamphlets etc. posted directly • Individual or small group discussions 	<ul style="list-style-type: none"> • Island Councils, Fisher Societies, WDCs and NGOs to assist in tracing the relevant SMEs
Fishermen who are illiterate or with low literacy who could be excluded for skills development trainings and exchange programs with Maldives	<ul style="list-style-type: none"> • Lack of access to modern communication modes and/or media • Inadequate financial resources to access relevant institutions and forums • Inability to forego their daily livelihoods and incomes 	<ul style="list-style-type: none"> • Approach via Island Fisher societies, WDCs and NGOs • Individual phone calls • House visits • Face-to-face meetings /small group meetings 	<ul style="list-style-type: none"> • Fisher Societies, WDCs and NGOs to assist in tracing the relevant persons and support their participation
Unrecognized workers (People where their work is left unrecognized)	<ul style="list-style-type: none"> • Low literacy levels • Lack of access to modern modes of communication /media • Inadequate financial resources to access business market/ network • Lack of opportunities for exposure due to their 	<ul style="list-style-type: none"> • Approach via Island Fisher societies, WDCs and NGOs • Individual phone calls • House visits • Face-to-face meetings /small group meetings 	<ul style="list-style-type: none"> • Fisher Societies, WDCs and NGOs to assist in tracing the relevant persons

	remote locations and financial limitations		
--	--	--	--

7.6 Summary Stakeholder Needs

Table 6 describes the needs of the key stakeholders who have been identified and their preferences/needs for engagement.

Table 6: Communication needs of stakeholders

Stakeholder Group	Key characteristics	Language needs	Preferred means notification/methods	Special needs
PROJECT AFFECTED PARTIES				
Individuals and families involved in fisheries and related diversification activities in Maldives	<ul style="list-style-type: none"> A majority has access to internet services and mobile phones Literate in Dhivehi 	Dhivehi	<ul style="list-style-type: none"> Via Island Councils, WDCs, Fisher Societies and NGOs Social media Print and electronic media Brochures/posters Small group meetings 	Mobilize the support of Island Councils, WDCs, Fisher Societies and NGOs
Fisher families engaged with formal and informal private sector including small enterprises in fishery and related diversification activities in remote atolls in Maldives	<ul style="list-style-type: none"> A majority has access to internet services and mobile phones Literate in Divehi 	Dhivehi	<ul style="list-style-type: none"> Via Island Councils, WDCs, Fisher Societies and NGOs Social media Print and electronic media Brochures/posters Small group meetings 	Mobilize the support of Island Councils, WDCs, Fisher Societies and NGOs
Fisher women engaged with formal and informal private sector including small enterprises in fisheries and related diversification activities in remote atolls in Maldives	<ul style="list-style-type: none"> A majority has access to internet services, and mobile phones. Literate in Divehi 	Dhivehi	<ul style="list-style-type: none"> Via Island Councils, WDCs, Fisher Societies and NGOs Social media Print and electronic media Brochures/posters Small group meetings 	Mobilize the support of Island Councils, WDCs, Fisher Societies and NGOs
Small and medium enterprises engaged in fish processing and fishery related diversification activities	<ul style="list-style-type: none"> Have access to internet services and mobile/smart phones, laptops etc. Literate in Dhivehi & English 	Dhivehi and English	<ul style="list-style-type: none"> Emails, letters telephone calls, Whatsapp groups messages Social media Print and electronic media Brochures/posters Individual or small group meetings Workshops 	Advance notification for meetings and mutually agreed dates and times
Private sector engaged in fisheries related activities	<ul style="list-style-type: none"> Have access to internet services and mobile/smart phones, laptops etc. 	Dhivehi and English	<ul style="list-style-type: none"> Emails, letters telephone calls, Whatsapp groups and messages Social media 	Advance notification for meetings and mutually agreed dates and times.

	<ul style="list-style-type: none"> Literate Dhivehi & English 		<ul style="list-style-type: none"> Print and electronic media Brochures/posters Physical/virtual meetings Workshops 	Meetings to be held periodically to update on project progress and seek inputs for the way forward
Women and youth engaged in fish processing and marketing	<ul style="list-style-type: none"> A majority has access to internet services, and mobile phones Literate in Dhivehi & and some also in English 	Dhivehi and English	<ul style="list-style-type: none"> Letters, telephone calls, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Small group meetings Workshops 	Advance notification for meetings and mutually agreed dates and times
Male and female staff of MoFMRA, MMRI and MMRDF	<ul style="list-style-type: none"> Have access to internet services, laptops, and mobile/smart phones etc. Literate Dhivehi & and some also in English 	Dhivehi and English	<ul style="list-style-type: none"> Letters, telephone calls, emails, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times
Campuses to be established at Viligili and Maniyafushi	<ul style="list-style-type: none"> Have access to internet services, laptops, mobile/smart phones Literate Dhivehi & and some also in English 	Dhivehi and English	<ul style="list-style-type: none"> Letters, telephone calls, emails, Whatsapp groups messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times. Meetings to be held periodically to update on project progress and seek inputs for the way forward
Maldives Industrial Fisheries Company (MIFCO) to undergo policy reforms and restructuring	<ul style="list-style-type: none"> Have access to internet services and mobile/smart phones, laptops etc. Literate Dhivehi & English 	Dhivehi and English	<ul style="list-style-type: none"> Emails, letters telephone calls, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops 	Advance notification for meetings and mutually agreed dates and times. Meetings to be held periodically to update on project progress and seek inputs for the way forward
Owners of fishing vessels whose vessels will be installed with new technological devices	<ul style="list-style-type: none"> A majority has access to internet services, and mobile phones Literate in Dhivehi & and some also in English 	Dhivehi and English	<ul style="list-style-type: none"> Letters, telephone calls, emails, Whatsapp groups and messages Social media Print and electronic media Brochures/posters 	Advance notification for meetings and mutually agreed dates and times

			<ul style="list-style-type: none"> Physical/virtual meetings Workshops & seminars 	
Leaseholder small and micro enterprises to be established in 54 uninhabited islands	<ul style="list-style-type: none"> Have access to internet services and mobile/smart phones, laptops etc. Literate Dhivehi & English 	Dhivehi and English	<ul style="list-style-type: none"> Emails, letters telephone calls, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops 	Advance notification for meetings and mutually agreed dates and times. Meetings to be held periodically to update on project progress and seek inputs for the way forward
Students (60) who would be chosen from SWIO countries to follow fishery related undergraduate courses and receive scholarships	<ul style="list-style-type: none"> Have access to internet services and mobile/smart phones, laptops etc. Literate in English 	English	<ul style="list-style-type: none"> Emails, letters telephone calls, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops 	Advance notification for meetings
Students and officers from SWIO countries who would be nominated for apprenticeship programs in Maldives	<ul style="list-style-type: none"> Have access to internet services and mobile/smart phones, laptops etc. Literate in English 	English	<ul style="list-style-type: none"> Emails, letters telephone calls, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops 	Advance notification for meetings
Teachers of undergraduate programs who will receive capacity development training	<ul style="list-style-type: none"> Have access to internet services and mobile/smart phones, laptops etc. Literate in English 	English	<ul style="list-style-type: none"> Emails, letters telephone calls, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops 	Advance notification for meetings
OTHER INTERESTED PARTIES				
Island Councils of targeted islands	<ul style="list-style-type: none"> Have access to internet services, laptops and mobile/smart phones Literate Dhivehi & and most of them also in English 	Dhivehi and English	<ul style="list-style-type: none"> Letters, telephone calls, emails, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times. Meetings to be held periodically to update on project progress and seek inputs for the way forward

National fisheries related institutions in the SWIO region	<ul style="list-style-type: none"> • Have access to internet services, laptops and mobile/smart phones etc. • Literate in English 	Local languages and English	<ul style="list-style-type: none"> • Letters, telephone calls, emails, Whatsapp groups and messages • Social media • Print and electronic media • Brochures/posters • Physical/virtual meetings • Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times. Meetings to be held periodically to update on project progress and seek inputs for the way forward. May require the services of country specific language experts to help in the preparation of information communication material
Individual small-scale fishers in the SWIO countries	<ul style="list-style-type: none"> • A majority may have access to internet services, and mobile phones • Literate in local languages & and some also in English 	Local languages and English	<ul style="list-style-type: none"> • Whatsapp messages & groups • Social media • Print and electronic media • Brochures/posters • Physical/virtual meetings 	Advance notification for meetings and mutually agreed dates and times. May require the services of country specific language experts to help in the preparation of information communication material
-Women fishers in the SWIO countries	<ul style="list-style-type: none"> • A majority has access to internet services and mobile phones • Literate in local languages & and some also in English 	Local languages and English	<ul style="list-style-type: none"> • Whatsapp messages & groups • Social media • Print and electronic media • Brochures/posters • Physical/virtual meetings 	Advance notification for meetings and mutually agreed dates and times. May require the services of country specific language experts to help in the preparation of information communication material
Ministry of Fisheries Marine Resources and Agriculture (MoFMRA)	<ul style="list-style-type: none"> • Has access to internet services, mobile/smart phones and laptops • Literate in Dhivehi & English 	Dhivehi and English	<ul style="list-style-type: none"> • Letters, telephone calls, emails, Whatsapp groups and messages • Social media • Print and electronic media • Brochures/posters 	Advance notification for meetings and mutually agreed dates and times. Meetings to be held periodically

			<ul style="list-style-type: none"> Physical/virtual meetings Workshops & seminars 	to update on project progress and seek inputs for the way forward
Maldives Marine Research Institute (MMRI)	<ul style="list-style-type: none"> Has access to internet services, mobile/smart phones and laptops Literate in Dhivehi & English 	Dhivehi and English	<ul style="list-style-type: none"> Letters, telephone calls, emails, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times. Meetings to be held periodically to update on project progress and seek inputs for the way forward.
Maniyafushi Mariculture Research and Development Facility (MMRDF)	<ul style="list-style-type: none"> Has access to internet services, mobile/smart phones and laptops Literate in Dhivehi & English 	Dhivehi and English	<ul style="list-style-type: none"> Letters, telephone calls, emails, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times. Meetings to be held periodically to update on project progress and seek inputs for the way forward.
Maldives National University and its four regional campuses	<ul style="list-style-type: none"> Have access to internet services, mobile/smart phones and laptops Literate in Dhivehi & English 	Dhivehi and English	<ul style="list-style-type: none"> Letters, telephone calls, emails, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times. Meetings to be held periodically to update on project progress and seek inputs for the way forward.
Private sector engaged in fishery related activities in the SWIO region	<ul style="list-style-type: none"> Has access to internet services, mobile/smart phones and laptops Literate in local languages & English 	Local languages and English	<ul style="list-style-type: none"> Letters, emails, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times. Meetings to be held periodically to update on project progress and seek inputs for the way forward. May require the services of country specific language experts to help in

				the preparation of information communication material.
UN- Food and Agriculture Organization (FAO)	<ul style="list-style-type: none"> • Has access to internet services, mobile/smart phones and laptops • Literate in English 	English	<ul style="list-style-type: none"> • Letters, telephone calls, emails, Whatsapp groups and messages • Social media • Print and electronic media • Brochures/posters • Physical/virtual meetings • Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times. Meetings to be held periodically to update on project progress and seek inputs for the way forward.
Indian Ocean Commission (IOC)	<ul style="list-style-type: none"> • Has access to modern communication modes, social media etc. • Literate in English 	English	<ul style="list-style-type: none"> • Letters, telephone calls, emails, Whatsapp groups and messages • Social media • Print and electronic media • Brochures/posters • Physical/virtual meetings • Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times. Meetings to be held periodically to update on project progress and seek inputs for the way forward.
South-West Indian Ocean Fisheries Commission (SWIOFC)	<ul style="list-style-type: none"> • Has access to modern communication modes, social media etc. • Literate in English 	English	<ul style="list-style-type: none"> • Letters, telephone calls, emails, Whatsapp groups and messages • Social media • Print and electronic media • Brochures/posters • Physical/virtual meetings • Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times. Meetings to be held periodically to update on project progress and seek inputs for the way forward.
Regional Project Management Unit (RPMU)	<ul style="list-style-type: none"> • Has access to internet services, mobile/smart phones and laptops • Literate in Dhivehi & English 	Dhivehi and English	<ul style="list-style-type: none"> • Letters, telephone calls, emails, Whatsapp groups and messages • Social media • Print and electronic media • Brochures/posters • Physical/virtual meetings • Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times. Meetings to be held periodically to update on project progress and seek inputs for the way forward.
Women Development Committees in Islands	<ul style="list-style-type: none"> • Have access to internet services, mobile/smart phones and laptops 	Dhivehi and English	<ul style="list-style-type: none"> • Letters, telephone calls, emails, Whatsapp groups and messages 	Advance notification for meetings and

	<ul style="list-style-type: none"> Literate in Dhivehi & English 		<ul style="list-style-type: none"> Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops & seminars 	mutually agreed dates and times.
Non-Governmental Organizations working with fisher communities	<ul style="list-style-type: none"> Have access to internet services, mobile/smart phones and laptops Literate in Dhivehi & English 	Dhivehi and English	<ul style="list-style-type: none"> Letters, telephone calls, emails, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times.
Media	<ul style="list-style-type: none"> Have access to internet services, mobile/smart phones and laptops Literate in Dhivehi & English 	Dhivehi and English	<ul style="list-style-type: none"> Letters, telephone calls, emails, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times.
Commercial Banks	<ul style="list-style-type: none"> Have access to internet services, mobile/smart phones and laptops Literate in Dhivehi & English 	Dhivehi and English	<ul style="list-style-type: none"> Letters, telephone calls, emails, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times.
Environmental Protection Agency (EPA)	<ul style="list-style-type: none"> Have access to internet services, mobile/smart phones and laptops Literate in Dhivehi & English 	Dhivehi and English	<ul style="list-style-type: none"> Letters, telephone calls, emails, Whatsapp groups and messages Social media Print and electronic media Brochures/posters Physical/virtual meetings Workshops & seminars 	Advance notification for meetings and mutually agreed dates and times.

8. Stakeholder Engagement Program

8.1 Purpose and Timing of Stakeholder Engagement Program

The overall objectives of SEP as stated in the ESS10 are:

- To identify the roles and responsibility of all stakeholders and ensure their participation in the complete project cycle.
- Establish a systematic approach to stakeholder engagements that will help the Project identify stakeholders and build and maintain constructive relationship with them, in particular project- affected parties

- Assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and implementation.
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them
- Ensure that appropriate information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format with special consideration for the disadvantaged or vulnerable groups.
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the Project to respond to and manage such grievances.
- To devise a plan of action that clearly identifies the means and frequency of engagement of each stakeholder.
- To allocate budgetary and other resources in the project design, project implementation, and Monitoring and Evaluation (M&E) for stakeholder engagement and participation

Thus, SEP provides an opportunity for all-inclusive approach in project preparation, planning, implementation and monitoring processes. It is geared toward ensuring meaningful and a wide consultative process guided by World Bank's Environmental and Social Framework (ESF), particularly ESS-10.

Information disclosure and consultation processes will continue with affected parties, other interested parties and vulnerable groups during (i) project preparation, (ii) project implementation, and (iii) project operational phases. A variety of methods such as group consultations, individual consultations and interviews through different offline and virtual mediums such as emails, telephone and conference calls etc. and communication through printed and electronic media, appropriate to the target audience, will be used for information disclosure and consultation.

8.2 Information Disclosure

During project preparation and planning, information related to project scope and schedule will be shared with project affected persons and other stakeholders during consultations.

Information about each component and phase of the Project will be provided to the public through media briefings, targeted media articles, information sessions, television/radio programs. The Project will also provide up-to-date information on the websites of MoFMRA, MMRI, MMRDF, SWIOFC and IOC.

At the appraisal stage, safeguard instruments including Environmental and Social Commitment Plan (ESCP), Stakeholder Engagement Plan (SEP) and Environmental and Social Management Framework (ESMF) prepared for this project will be disclosed on the websites of MoFMRA, SWIOFC, IOC and FAO and on the World Bank's external website, after their clearance by the government and the Bank. Additionally, copies of the referenced documents will be kept at the MoFMRA, SWIOFC, IOC and FAO for public reference. Any changes to the approved ESCP, ESMF and SEP would have to follow the same clearance/ approval procedures and disclosure.

During project implementation, sub-project specific safeguard instruments will be publicly disclosed in-country. Environment and Social Framework documents and plans that are prepared for this project will be publicly disclosed and include:

- Environment and Social Impact Assessment (ESIA)
- Environmental and Social Commitment Plan (ESCP)
- Environment and Social Management Plans (ESMPs)
- Stakeholder Engagement Plan (SEP)
- Gender Action Plan (GAP)
- Labour Management Procedure (LMP)
- Occupational Health and Safety Management Plan (OHSMP)
- Community Health and Safety Plan (CHSP)
- Monitoring activities undertaken as per ESCP, SEP and ESMP
- Project quarterly reports and annual reports

Translations of executive summary of all documents prepared by the project in Dhivehi and in local languages of the SWIO countries, will also be made available to the public through the websites of MoFMRA, SWIOFC, IOC and FAO. Information can also be disseminated through digital platform (where available) like Facebook, Twitter, WhatsApp/viber groups, and traditional means of communications (TV, newspaper, radio, phone calls and e-mails) with clear description of mechanisms for providing feedback via mail, websites, and r dedicated telephone lines. All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions.

Table 7 provides a plan for information disclosure during project preparatory, implementation and operational periods.

Table 7: Information disclosure plan

List of information to be disclosed	Proposed methods	Timetable/Location/Dates	Target stakeholders	Responsibility
PROJECT PREPARATION AND PLANNING PHASE				
Environmental and Social Commitment Plan, Environmental and Social Review Summary and Stakeholder Engagement Plan	Display of the reports. Public to be informed of the availability of reports via newspaper advertisements published in Dhivehi, local languages of SWIO countries and English and public notices, project website and through other direct communication channels such as mobile/telephone calls, Whatsapp messages, etc. Physical /virtual consultations to be organised when required.	Website & physical display at the RPMU, CPMD, MoFMRA, SWIOFC, IOC and FAO. Reports to be disclosed 3 months prior to the commencement of the project and will remain available throughout the project period	Affected parties, other interested parties and vulnerable groups	RPMU, CPMD & MoFMRA
Project designs, feasibility studies, implementation plans prepared for each component/subcomponent of the project, Labour Management Procedures, and Gender Action Plan	Display of the documents. Public to be informed of the availability of documents via newspaper advertisements published in Dhivehi, local languages in SWIO countries and English and public notices, project website and through other direct communication channels such as mobile/telephone calls, Whatsapp messages,	Website & physical display at the RPMU, CPMD and MoFMRA, SWIOFC, IOC and FAO as and when they are available	Affected parties, other interested parties and vulnerable groups	RPMU, CPMD & MoFMRA

	social media etc. Physical / virtual consultations to be organised when required.			
Grievance redress mechanism including places to report sexual harassment, and gender-based violence	E-Brochures/ Brochures printed in Dhivehi and English, social media, mainstream media, etc.	Within 03 months of commencement of the project and will continue throughout the project period.	Affected parties, other interested parties, and vulnerable groups	RPMU, CPMD & MoFMRA
Project partner institutions contributing to project implementation and their roles and responsibilities	List of agencies published in the websites of MoFMRA, SWIOFC, IOC and FAO and mainstream media, social media	Throughout the project period including operational phase	Affected parties, other interested parties, and vulnerable groups	RPMU, CPMD & MoFMRA
PROJECT IMPLEMENTATION PHASE				
Progress reports of the project prepared by RPMU, CPMD & other partner institutes and video clips related to project performance	Websites of MoFMRA, SWIOFC, IOC and FAO and via emails to project stakeholders	Continuously and as and when they are ready	Affected parties, other interested parties, and vulnerable group	RPMU & CPMD
Summary outcomes of consultation meetings	Website of MoFMRA	Continuously	Affected parties, other interested parties, and vulnerable groups	RPMU & CPMD
Status/progress of grievance resolution	Website of MoFMRA	Continuously	Affected parties, other interested parties and vulnerable groups	RPMU, CPMD & MoFMRA
Capacity building training programs, awareness raising programs, educational exchange programs, matching grants and technical assistance for SMEs available, planned and implemented, and technological devices available for fishing vessels	Websites of MoFMRA, MMRI, MMRDF, National University of Maldives, SWIOFC, IOC and FAO, print and electronic media, social media, mainstream media	Continuously	Affected parties, other interested parties and vulnerable groups	RPMU, CPMD & MoFMRA

Project's key deliverables e.g. policy and regulatory frameworks, research outcomes, establishment of research laboratories, skills enhancement programs, etc.	Websites of MoFMRA, MMRI, MMRDF, National University of Maldives, SWIOFC, IOC and FAO, print and electronic media, social media	Continuously	Affected parties, other interested parties and vulnerable groups	RPMU, CPMD & MoFMRA
Feedback from project beneficiaries and other interested parties on project implementation modalities	Websites of MoFMRA, MMRI, MMRDF, National University of Maldives, SWIOFC, IOC and FAO, print and electronic media, social media	Continuously	Affected parties, other interested parties and vulnerable groups	RPMU, CPMD & MoFMRA
PROJECT OPERATION PHASE				
Project's achievements, drawbacks, challenges, any remedial measure adopted	Websites of MoFMRA, MMRI, MMRDF, National University of Maldives, SWIOFC, IOC and FAO	Continuously	Affected parties, other interested parties and vulnerable groups	RPMU, CPMD & MoFMRA
Feedback from project beneficiaries and other interested parties on project's impacts	Websites of MoFMRA, MMRI, MMRDF, National University of Maldives, SWIOFC, IOC and FAO, print and electronic media, social media	Continuously	Affected parties, other interested parties and vulnerable groups	RPMU, CPMD & MoFMRA

8.2 Proposed Strategy for Stakeholder Engagement

The project will continue to consult the project affected parties; other interested parties and the vulnerable and disadvantaged groups, specifically on themes listed below, in order to elicit their views and feedback. Individual and group meetings, mini-workshops/focus group discussions, satisfaction surveys, social media, community monitoring, etc. will be used to facilitate the consultations on the following:

- Knowledge and skills enhancement programs for entrepreneurship development, fishery sector diversification activities including value additions and value chains
- Job-oriented training programs and undergraduate educational programs
- Experience sharing exchange programs with Maldives
- Policy reforms and regulatory frameworks for fishery sector
- Selection and participation of small and medium enterprises
- Access to institutional credit, matching grants and technical advisory services including new technological devices for fishing vessels
- Research programs and fishery management systems
- Engagement of women and vulnerable groups

Table 8: Strategy for stakeholder engagement

Target stakeholders	Topic(s) of engagement	Method/s used	Location/frequency	Responsibility
PROJECT PREPARATION AND PLANNING PHASE				
Regional Project Management Unit and representatives of the key implementing partner institutions in Maldives and SWIO region	<ul style="list-style-type: none"> Project deliverables and planned outcomes Overview of environmental & social requirements of the project Introduction to E & S documents Stakeholder engagement & information disclosure Gender Action Plan E & S monitoring and reporting 	Consultative workshop with ppt. presentations, and a document summarizing the key aspects of the topics to be covered for circulation	At MoFMRA prior to the commencement of the project activities, and virtual meetings with relevant institutions in the SWIO region and FAO	RPMU & MoFMRA
Staff of RPMU, CPMD, Councils of target islands, and relevant staff of MoFMRA	<ul style="list-style-type: none"> Project deliverables and planned outcomes E&S requirements of the project Introduction to E &S documents Stakeholder engagement, Information disclosure & consultations Gender Action Plan 	Consultative workshop with ppt. presentations, and a document summarizing the key aspects of the topics to be covered for circulation	At MoFMRA prior to the commence of the project activities	CPMD & MoFMRA
Project contractors and consultants, WDCs, NGOs and media	<ul style="list-style-type: none"> Project deliverables and planned outcomes E&S requirements of the project Labour management procedures Occupational Health and Safety Management Plan (OH&SMP) Community Health and Safety Plan (CH&SP) Gender Action Plan (GAP) 	Consultative workshop with ppt. presentation, and a document summarizing the key aspects of the topics to be covered for circulation	At RPMU Office prior to the commencement of the project activities	RPMU & CPMD
PROJECT IMPLEMENTATION PHASE				
Regional Project Management Unit (RPMU), Corporate Project Management Unit	<ul style="list-style-type: none"> Review of project deliverables and planned outcomes 	<ul style="list-style-type: none"> Review workshop 	At MoFMRA Bi-annual workshops and virtual meetings with relevant	RPMU, CPMD & MoFMRA

(CPMD), and key implanting partner institutions in Maldives and SWIO region	<ul style="list-style-type: none"> • Review of E & S management in the project • Review of stakeholder engagement • Review of gender action plan • Identifying gaps & issues • Recommendations for E & S strengthening 		institutions in the SWIO region and FAO	
Staff of RPMU and CPMD, Councils of targeted island, relevant staff of MoFMRA	<ul style="list-style-type: none"> • Project deliverables and planned outcomes • Review of E & S management in the project • Review of stakeholder engagement • Review of gender action plan • Identifying gaps & issues • Recommendations for E & S strengthening 	Review workshop/meetings	At MoFMRA Quarterly workshops / meeting	RPMU, CPMD & MoFMRA
Project contractors and consultants, WDCs, NGOs and media	<ul style="list-style-type: none"> • Review of project deliverables and planned outcomes • Review of E & S management in the project • Identifying gaps & issues • Recommendations for E & S strengthening 	Review workshop/meetings	At MoFMRA Quarterly workshop/meetings	RPMU & CPMD
Project beneficiary groups and other interested parties	<ul style="list-style-type: none"> • Review of project benefits, outcomes and impacts • E & S risks and impacts • Project implementation procedures • Recommendations to enhance benefits and minimize risks 	Consultative meeting (physical / virtual)	At the offices of individual partner agencies and other appropriate places such as social and virtual meetings with relevant institutions in the SWIO region and FAO centres Bi-annual	RPMU & CPMD
PROJECT OPERATION PHASE				
Regional Project Management Unit (PMU), Corporate Project	Review and monitor the establishment and functioning of project's	At pre-arranged and invited meetings	At MoFMRA and virtual meetings with relevant institutions in the	RPMU, CPMD & MoFMRA

Management Unit (CPMD), councils of targeted islands and Key implementing partner institutes	outputs, outcomes, and impacts		SWIO region and FAO centres Quarterly	
Staff of RPMU and CPMD, councils of targeted islands, relevant staff of MoFMRA	Review and monitor the establishment and functioning of project's outputs, outcomes, and impacts	At pre-arranged and invited meetings	At RPMU & CPMD Quarterly	RPMU, CPMD & MoFMRA
Project beneficiary groups and other interested parties	Feedback on project's operational modalities, project's outcomes and impacts	Consultative meetings (physical/virtual) and feedback surveys	At the offices of individual agencies and other appropriate places such as social centres and surveys vis social media/postal questionnaires Bi-annual	RPMU, CPMD & MoFMRA

8.3 Proposed Strategy/Differentiated Measures to Include the Views of And Encourage Participation by Vulnerable Groups

Table 9 presents a strategy for the engagement of vulnerable and disadvantaged groups in consultative processes.

Table 9: Strategy for the engagement of disadvantaged/vulnerable groups

Vulnerable/Disadvantaged group	Strategy
Poor fisher families who may not have the minimum assets to access the project benefits	<ul style="list-style-type: none"> Engagement of Fishery Societies, Women's' Development Committees (WDC) and NGOs working on related fields to approach the target group and to mobilize their participation. Establishing help desks in suitable places. Providing financial assistance for their participation and to compensate for any loss of their livelihoods and incomes Conducting face-to-face meetings and small group meetings in places and at times convenient to the target group
Women headed fisher households who may not be able to participate in the project such as skills development trainings due to household burdens	<ul style="list-style-type: none"> Engagement of Fishery Societies, Women's' Development Committees (WDC) and NGOs working on related fields to approach the target group and to mobilize their participation. Establishing help desks in suitable places. Providing financial assistance for their participation and to compensate for any loss of their livelihoods and incomes Conducting face-to-face meetings and small group meetings in places and at times convenient to the target group
Small and medium enterprises which may get excluded from the participation in the project	<ul style="list-style-type: none"> Engagement of Island Councils, Fishery Societies, Women's' Development Committees (WDC) and NGOs working on related fields to approach the target group and to mobilize their participation.

activities due to their limited capacities, resources and their geographical location (remote islands/atolls)	<ul style="list-style-type: none"> • Establishing help desks in suitable places. • Conducting small group meetings in places and at times convenient to the target group
Fishermen who are illiterate or with low literacy who could be excluded for skills development trainings and exchange programs with Maldives	<ul style="list-style-type: none"> • Engagement of Fishery Societies, Women’s’ Development Committees (WDC) and NGOs working on related fields to approach the target group and to mobilize their participation. • Establishing help desks in suitable places. • Providing financial assistance for their participation and to compensate for any loss of their livelihoods and incomes • Conducting face-to-face meetings and small group meetings in places and at times convenient to the target group Use appropriate communication methods such as audio-visuals during consultations • Conducting Individual phone calls
Unrecognized workers (People where their work is left unrecognized)	<ul style="list-style-type: none"> • Engagement of Fishery Societies, Women’s’ Development Committees (WDC) and NGOs working on related fields to approach the target group and to mobilize their participation. • Establishing help desks in suitable places. • Providing financial assistance for their participation and to compensate for any loss of their livelihoods and incomes • Conducting face-to-face meetings and small group meetings in places and at times convenient to the target group Use appropriate communication methods such as audio-visuals during consultations • Conducting Individual phone calls

8.4 Public Comments and Feedback/Reporting to Stakeholders

Public/stakeholders will be given a period of 2 weeks to review and submit their comments on the E & S documents and any other project related documents disclosed. Such submissions can be made to a designated focal point at the RPMU either verbally or in writing including emails, social media messages etc. Verbal communications either via telephone or in person will be recorded by a member of the RPMU/CPMD. All comments received by the project will be reviewed by the RPMU/CPMD and any decisions made based on public/stakeholders’ comments will be communicated to all relevant stakeholders within 05 days after the review meetings. If the project had not been able to make any decision in response to public/stakeholder comments, same will be communicated to the relevant stakeholders with explanations as to why a decision cannot be made.

9. Roles, Responsibilities of Implementing Agencies and Resources for Implementing Stakeholder Engagement Activities

9.1 Resources

As outlined below, resources required for implementation of the stakeholder engagement plan would include costs of information disclosure and stakeholder consultations at Male’ and in outer islands and where required with persons and institutions in the SWIO region; and the cost of the grievance redress mechanism. The project cost tables and annual work plans and budget shall allocate costs for specific information disclosure and stakeholder consultation activities including: maintenance of preparation, printing and dissemination of information materials, and costs of stakeholder consultation workshops. In addition, the project cost tables shall include specific budget for the Grievance Redress Mechanism (GRM).

9.2 Estimated Budget

The costs associated with the implementation of the SEP will be provided by MoFMRA. A budget for SEP implementation over a period of 7 years is presented in Table 10. The project will review the SEP every six

months to determine whether any changes to stakeholder classification or engagement are required including the project implementation period. If any significant changes were observed, the SEP will be updated and disclosed, and the budget will be revised accordingly.

Table 10: Estimated budget for SEP implementation

No.	Activity	No. Units	Unit Cost (MVR)	No. Months /Units	Total Amount	
					In MVR	In USD
1	PERSONNEL					
1.1	Environmental and Social Safeguards Specialist/SEP coordinator (included in CPMD budget)	1	30,840	84	2,590,560	168,000
1.2	Monitoring and Evaluation Specialist/GRM Coordinator (included in CPMD budget)	1	30,840	84	2,590,560	168,000
1.3	Communications Specialist (included in CPMD budget)	1	25,000	84	2,100,000	136,187
2	INFORMATION DISCLOSURE					
2.1	Development of communication tools, methods and materials (animations, e-brochures, e-leaflets, information booklets, posters, display boards, etc. for content creation, editing, translations into local languages and layout and printing) (covered in ESMF)			lump-sum	1,156,500	75,000
2.2	Newspaper advertisements (in three language), radio announcements, TV programs, maintaining Webpage or increasing social media outreach			lump-sum	771,000	50,000
3	STAKEHOLDER ENGAGEMENT					
3.1	Develop Stakeholder communication plan for each stakeholder group. (Y1)				77,100	5000
3.2	Revision of stakeholder communication plan (Y3)				77,100	5000
3.3	Meetings/workshop/FGDs (hiring of venues, refreshments, etc.) – exact plans to be determined as per communication plan			lump-sum	771,000	50,000
3.4	Implementation of Grievance Redress Mechanism (included in CPMD budget)			lump-sum	308,400	20,000
3.5	Surveys for monitoring and evaluation of SEP (questionnaire design, printing, questionnaire administration, data processing and analysis, etc.) (covered under			lump-sum	385,500	25,000

	annually beneficiary surveys using GEMs or equivalent/ covered under CPMD budget)/additional cost required for data analysis					
3.6	Travel Logistics (covered in ESMF)			lump-sum	1,156,500	75,000
	TOTAL				11,984,220	777,187

The project will be implemented by MoFMRA. A Regional Project Management Unit (RPMU) and Corporate Project Management Division (CPMD) will be established respectively for implementation of the project. The RPMU and CPMD will be headed by a Project Manager (PM). The RPMU and CPMD is responsible for overall implementation of the project ensuring that all environmental and social safeguard requirements are met in accordance with the requirements of the World Bank’s Environmental and Social Framework. The key staff of the RPMU will comprise a Project Manager, Financial Manager/Specialist, Accountant, Procurement Staff and Monitoring and Evaluation Officer acquired through IOC.

The key staff of the CPMD will comprise a Project Manager, Finance Director (from MoFMRA), Finance Manager/Specialist, Accountant, Program Assistant (Finance), Environment and Social Safeguards Specialist, and the Monitoring and Evaluations Specialist will be responsible for the overall coordination, implementation and monitoring of the SEP including the GRM. He/she will be assisted by a Communications Specialist especially in relation to coordination with media and undertaking awareness raising activities. Moreover, the implementation partners will identify Environmental and Social Focal points who will assist in implementation of SEP.

Table 11: Responsibilities of key stakeholders in SEP implementation

Stakeholder		Responsibilities
Regional Project Management Unit (RPMU)		<ul style="list-style-type: none"> • Overall coordination and implementation of the SEP • Provide adequate financial resources for SEP implementation • Coordinate and collaborate with project partner agencies, other stakeholders, consultants and contractors and ensure their proactive participation in SEP implementation • Maintain regular communications with all relevant stakeholders • Design and produce relevant communication tools and materials • Organize, conduct and facilitate stakeholder engagement activities including meetings and discussions, surveys, awareness raising campaign etc. • Ensure efficient functioning of the GRM and manage the grievance resolution processes. • Document all stakeholder engagement activities and their outcomes, and maintain a systematic database. • Review feedback received from all stakeholders, make appropriate decisions in collaboration with project partners and report back to the relevant stakeholders and concerned parties. • Monitor and report on the progress of SEP implementation including operations of the GRM • Undertake periodic reviews of SEP and update and disclose whenever necessary
Corporate Management Division (CPMD)	Project Division	<ul style="list-style-type: none"> • Overall coordination and implementation of the SEP • Provide adequate financial resources for SEP implementation

	<ul style="list-style-type: none"> • Coordinate and collaborate with project partner agencies, other stakeholders, consultants and contractors and ensure their proactive participation in SEP implementation • Maintain regular communications with all relevant stakeholders • Design and produce relevant communication tools and materials • Organize, conduct and facilitate stakeholder engagement activities including meetings and discussions, surveys, awareness raising campaign etc. • Ensure efficient functioning of the GRM and manage the grievance resolution processes. • Document all stakeholder engagement activities and their outcomes, and maintain a systematic database. • Review feedback received from all stakeholders, make appropriate decisions in collaboration with project partners and report back to the relevant stakeholders and concerned parties. • Monitor and report on the progress of SEP implementation including operations of the GRM • Undertake periodic reviews of SEP and update and disclose whenever necessary
Project implementing Institutes	<ul style="list-style-type: none"> • Organize, conduct and facilitate stakeholder engagement activities including meetings and discussions, surveys, awareness raising campaigns etc. with their respective sub-departments, institutions, and relevant clients/service users etc. • Document all stakeholder engagement activities and their outcomes, and maintain a systematic database • Review feedback received from all stakeholders, make appropriate decisions in collaboration with project partners and report back to the relevant stakeholders and concerned parties. • Undertake periodic reviews of SEP in relation to the aforementioned activities and update and disclose whenever necessary • Devise appropriate methods and tools to disseminate project related information to their respective clients • Conduct stakeholder consultations on project interventions, implementation procedures, anticipated benefits and impacts and timeframes • Participate in the resolution of public grievances • Provide feedback on project related documents disclosed for public scrutiny • Monitor and evaluate the information disclosure programs and stakeholder consultations
Project affected parties	<ul style="list-style-type: none"> • Participate in consultations and information dissemination programs, and raise issues and concerns with relevant authorities • Use GRM to report grievances and complaints and ensure their satisfactory resolution • Assist the relevant authorities to develop and implement appropriate mitigation measures • Participate and support the implementation of stakeholder engagement activities in the SEP, ESCP, etc. • Provide feedback on project related documents disclosed for public scrutiny

Other interested parties	<ul style="list-style-type: none"> • Provide feedback on project deliverables and outcomes • Participate in consultations and information dissemination programs, and raise issues and concerns with relevant authorities • Assist the project affected parties to raise their grievances and concerns with the relevant agencies. • Assist the relevant authorities to develop and implement appropriate mitigation measures. • Provide feedback on project related documents disclosed for public scrutiny • Provide feedback on project deliverables and outcomes
---------------------------------	--

10. Grievance Redress Mechanism

The Grievance Redress Mechanism (GRM) addresses grievances in an efficient, timely and cost-effective manner, that arise in the project, either due to the actions of the project staff and from affected communities and external stakeholders. The RPMU and CPMD will be responsible for managing the GRM for the entire project. Once a grievance is logged with the RPMU or CPMD, the Monitoring and Evaluations Specialist will assist in screening and sorting the grievances as per the project components and determining their eligibility for resolution by project based GRM. He/she will also facilitate the participation of relevant agencies under each project component to support the grievance resolution process by RPMU and CPMD. The RPMU and CPMD has overall responsibility to administer the GRM process and determine the best course of action to resolve the grievance. Further, the project affected persons, as well as other interested parties, will be fully informed of the GRM, its functions, procedures, timelines and contact persons both verbally and through booklets and information brochures during consultation meetings and other stakeholder engagement activities.

10.1 Scope of the GRM

The impacts of the Project may raise grievances and complaints on the part of affected persons in relation to: (i) lack of infrastructure facilities and information communications; (ii) inequitable distribution of services and facilities; (iii) exclusion of some sections of the communities and agencies benefiting from the project; and (iv) affordability and accessibility to services and facilities etc.

In addition to a code of conduct provided for individual members of the project staff and the staff of civil works contractors restraining sexual harassment (SH), sexual exploitation and abuse (SEA) and gender-based violence (GBV) in work places and construction sites, the project based GRM will also include special provisions for reporting and responding to the grievances and complaints related to SH, SEA, and GBV. The project staff shall also be made aware of the avenues available for survivors of SH, SEA and GBV such as reporting to the Sexual Harassment Prevention Committee at the MoFMRA, established under Prevention of Sexual Harassment Act (16/2014). Qualified beneficiaries of the capacity building and training activities, including the training of trainers and selected undergraduate program, will be appropriately vetted. They will receive SEA/SH training and be subject to code of conduct standards. Additionally, the capacity building activities will be delivered under a public/structured environment. The SEA-SH assessment tool (Civil Works and SPJ) risk rating for the project is low.

The project related GRM will be available for project stakeholders including project affected persons, to submit complaints/grievances, questions, comments, and suggestions, or provide any form of feedback on all project-funded activities. The GRM will be easily accessible to the aggrieved parties irrespective of their ethnicity, religion, gender, and other social and economic differences. Moreover, it will ensure its transparency, efficiency and accountability in grievance handling and responding while winning the confidence of the complainants. The GRM will endeavour to resolve the grievances locally, and to avoid lengthy court procedures. The GRM will be managed and coordinated by the MoFMRA to be set up for the Project. The Environmental and Social Safeguards Specialist for the project will act as GRM focal for the project.

10.2 GRM Structure

The GRM will function throughout the life cycle of the project implementation.

10.2.1 Composition of Grievance Redress Committee (GRC)

The MoFMRA will establish a Grievances Redress Committee (GRC), chaired by the project director, for the project comprising representatives from the (1) Regional Project Management Unit (RPMU), (2) Corporate Project Management Division, (3) Implementing partner Institutions, (4) Island Councils, and (5) NGOs/Civil Society organizations. Additionally, a legal officer will be appointed to the GRC. Adequate female representation and participation in the composition of the GRC will be ensured. The GRC will be chaired by the Project Manager/Director.

The GRC will convene its meetings when a grievance has been lodged. The committee will also consult the relevant technical experts or other partner agencies and carry out site visits, when required. GRC will reach a settlement through consensus among its membership. The GRC will conclude its proceedings within a period of 14 days since the submission of the grievance. If an agreement or resolution is reached, the key points of the agreement/resolution will be summarized, documented and signed by both, the affected person and the GRC.

10.2.2 Process of Reporting Grievances

The GRM will establish multiple channels through which citizens/beneficiaries/affected persons can make complaints regarding project funded activities. Complaints can be submitted either verbally or in written form using a variety of communication tools such as formal letters/petitions, telephone, email, SMS, on-line entry system etc. Moreover, there will be printed standard formats made available at the GRM focal point to receive grievances which can be accessed by the complainants to record their grievances. Aggrieved parties can also submit their grievances via project's website. If project stakeholders/affected parties provide verbal feedback/complaint, project staff will lodge the complaint on their behalf, and it will be processed through the same channels.

10.2.3 Focal Points for Receiving/Recording Grievances

The Monitoring and Evaluations Specialist will be the main focal point for receiving the grievances related to the project. He/she will also be the GRM coordinator. Moreover, the Communications Specialist will be overall responsible to increase awareness of GRM of project affected/interested/disadvantaged parties, especially women. Additionally, there will be designated focal points in each of the project implementing partner agencies and at each location of project civil works activity. Records of grievances should be maintained online through a grievance log data sheet that should be shared with all implementation partners of the project. Names of the focal points together with their contact phone numbers, and email addresses will be posted at visible locations and other strategic locations and will be visible on all awareness material prepared for the project.

In the case of the SEA/SH related allegation, a survivor-centric approach should be applied to collect as little information as possible. These include (1) the allegation in the survivor's own words; (2) if the alleged perpetrator is, to the best of the survivor's knowledge, related to the project; and, if possible, (3) the age and sex of the survivor.

SEA-SH-related complaints will be dealt with strict confidentiality, based on the wishes of the victim/survivor. The case of SEA/SH, the GM operator (Monitoring and Evaluations Specialist) should report minimize sharing potentially sensitive information to the implementing agency, who should then notify the bank task team. These includes:

- a) the nature of the case;
- b) if the case is project-related;
- c) age and sex of survivor (if available); and
- d) if the survivor was referred to services

Names of the focal points together with their contact phone numbers, and email addresses will be posted at visible locations and other strategic locations and will be visible on all awareness material prepared for the project. Any SEA-SH survivor will be referred to an NGO assigned for the project by the IA to manage and respond to SEA-SH

cases. The NGO will support SEA-SH cases in accessing service providers and guiding them through options of lodging a complaint. The accountability and response framework will be based on the latest WB ESIRT guideline.

10.2.4 Screening, Acknowledgment and Closure of Grievances

The focal points who receive the grievances will forward the grievances to the GRM coordinator at CPMD either on the same day or the following day. The coordinator will respond to the complainant acknowledging the grievance and explaining the course of action to be taken and its approximate time frame for resolution. This acknowledgement and notification will be sent to the complainant within three days of receiving the complaint in writing, i.e. through letter or email.

In consultation with Project Manager (PM), the GRM coordinator will review and determine the (i) eligibility of the grievance/complaint for hearing by the GRC; and (ii) the timeframe within which the complaint should be resolved. Having determined the above, the coordinator will refer the complaints to the GRC. Such referrals should be completed within a maximum of 4 working days of receiving the complaint. If complaints take longer than the stipulated period to handle, weekly updates will be provided to the complainant in writing indicating the reasons for delay. Grievances that do not meet the eligibility criteria to be investigated in the GRM will be notified to the aggrieved party/complainant by GRM coordinator within 03 working days of receiving the grievance.

Decisions of the GRC will also be formally communicated to the complainants by the GRM coordinator. A grievance will be considered 'resolved' or 'closed' when a resolution satisfactory to both parties has been reached, and after corrective measures has been successfully implemented. When a proposed solution is agreed between the project and the complainant, the time needed to implement it will depend on the nature of the solution. However, the actions to implement this solution will be undertaken within one month of the grievance being logged and will be tracked until completion. Once the solution is being implemented or is implemented, the GRM coordinator will also request feedback from the complainant as to whether s/he deems the action(s) satisfactory, and this will be recorded along with the details of the complaint and the action taken.

In certain situations, however, the Project may "close" a grievance even if the complainant is not satisfied with the outcome. This could be the case, for example, if the complainant is unable to substantiate a grievance, or it is obviously speculative or fraudulent. In such situations, the project's efforts to investigate the grievance and to arrive at a conclusion will be well documented and the complainant advised of the situation. The project will not dismiss grievances based on a cursory review and close them unless the complainant has been notified and had the opportunity to provide supplementary information or evidence.

10.2.5 Appeal Process

Affected parties who are dissatisfied with the decision of the above mentioned GRC can appeal to the Secretary of the MoFMRA for reconsideration of the GRC's decision and seeking his/her intervention to redress the grievance. The GRM established under the project will not impede access to the legal system. Affected persons can leave the GRM at any point, if they are dissatisfied with the process and the decisions of the GRM, and can resort to legal action through the country's judiciary system at any time.

10.3 Awareness Raising on GRM

Information about the grievance handling system will be distributed to all project affected people and other stakeholders through regular information channels used by the project including initiating meetings at the start of the project, public consultations held, public meetings during project implementation, brochures/pamphlets in local languages, posting on notice boards and online. The Environmental and Social Safeguards Specialist together with Communications Specialist of the project will play a lead role in awareness building and information sharing on the GRM. Moreover, the stakeholder engagement program of the project will be used by the RPMU and CPMD to encourage the use of the GRM. When organizing and conducting these campaigns, special efforts shall be made to reach vulnerable groups. Information to be disseminated will include the scope of the GRM, focal points for receiving grievances, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when and how), the investigation process, the timeframe(s) for responding to the complainant, as well as the principle of

confidentiality and the right to make anonymous complaints. Furthermore, the project will provide orientation and training to the members of the GRC on effective grievance handling procedures.

10.4 Monitoring and Reporting

10.4.1 Project Level Reporting and Monitoring

The RPMU will assess the functioning of the GRM. The RPMU will be responsible for regular reporting of the GRM status including those grievances received, resolved, and pending. The GRM coordinator will: (i) ensure accurate entry of GRM data into the online log-sheet (data base); (ii) include details of GRM on project quarterly reports; and (iii) review the status of complaints to track which are not yet resolved and suggest any needed remedial action.

The quarterly and annual progress reports will include updated information on the following:

- ✓ Status of establishment of the GRM (procedures, staffing, training, awareness building, budgeting etc.).
- ✓ Quantitative data on the number of complaints received, the number that were eligible, and the number resolved
- ✓ Qualitative data on the type of complaints and answers provided, issues that are unresolved
- ✓ Time taken to resolve complaints
- ✓ Number of grievances resolved and raised/appealed to higher levels
- ✓ Summary of resolutions/decisions made
- ✓ Satisfaction with the action taken
- ✓ Any particular issues faced with the procedures/staffing or use
- ✓ Factors that may be affecting the use of the GRM/beneficiary feedback system
- ✓ Any corrective measures adopted

10.4.2 Reporting to World Bank

The World Bank will be kept informed and where necessary consulted on World Bank requirements, during the process of grievance resolution, and also on the outcome of the process. A summary sheet of all complaints received and resolved will be shared with the World Bank Task Team. Any complaint or incident categorized as high risk should be reported to the World Bank Task Team immediately.

10.4.3 GRM Contact Information

Aggrieved parties can approach and use the following contact/s for any inquiries regarding their grievances/complaints and feedback. The contact details will be updated once the Regional Project Management Unit is formed and the required staff are appointed. However, Ministry of Fisheries, Marine Resources and Agriculture will take primary responsibility of managing and resolving GRM cases.

Name of the Project	Transforming Fisheries Sector Management in South-West Indian Ocean Region and Maldives Project
Project Implementing Agency	Indian Ocean Commission (IOC) Secretariat Maldives Ministry of Fisheries, Marine Resources and Agriculture (MoFMRA)
Address	Ministry of Fisheries Marine Resources and Agriculture, Velaanaage 7 th Floor, Ameer Ahmed Magu, Male'
Email	
Website	https://www.gov.mv/en/organisations/ministry-of-fisheries-marine-resources-and-agriculture
Telephone	MoFMRA: +960 3322625

11 Monitoring and Reporting

11.1 Involvement of Stakeholders in Monitoring Activities

The project will establish multiple mechanisms for monitor and evaluate the SEP implementation. They would include the following arrangements.

- ✓ Overall monitoring and evaluation by the RPMU and CPMD
- ✓ Engagement of the project implementing partners to monitor and receive feedback from the relevant stakeholders
- ✓ Engagement of the project affected parties, vulnerable groups, and media to monitor and report on the adequacy and usefulness of (i) information disclosure programs; (ii) consultations; and (iii) stakeholder engagement activities via their participation in individual/group consultations, and in the GRM. This would be undertaken during project mid-term and during project closure.

The project will use a variety of methods and tools for monitoring and evaluation. They will include review of project documents and progress reports, stakeholder interviews and group discussions, feedback surveys, site visits etc. SEP implementation team of RPMU and CPMD will coordinate and facilitate documentation of the monitoring and evaluation results and outcomes including the maintenance of records of all consultations and meetings conducted with stakeholders, types of information disclosed, issues and concerns raised at consultations/meetings, public comments/feedback received for disclosed documents, informal feedback, decisions made, and reporting back to the stakeholders. The following monitoring framework in Table 12 provides a set of indicators that could guide the monitoring processes.

Table 12: Monitoring requirements of SEP

No.	Monitoring Indicators	Methods	Timeframe	Responsibility
1	No. of affected parties, other stakeholders and vulnerable groups engaged in SEP implementation	Review of reports on consultations and progress reports	Quarterly	Environment & Social Specialist and project implementing partners
2	Type of information shared/disclosed	Review of information material shared and their content	Quarterly	Environment & Social Specialist and project implementing partners
3	Type of methods and tools used for information dissemination and their effectiveness	Review of communication methods and tools used, observations and feedback interviews and consultations with information recipients	Quarterly	Environment & Social Specialist and project implementing partners
4	Accessibility to information and language used for communication	Records of persons who sought information; observation and feedback interviews and FDGs with stakeholders, feedback survey (annual)	Quarterly	Environment & Social Specialist and project implementing partners
5	Level of awareness among affected parties, other stakeholders and vulnerable groups on project implementation procedures	Focus group discussions and individual interviews with a cross-section, feedback survey (annual)	Bi-annually	Environment & Social Specialist and project implementing partners

	including GRM and potential impacts			
6	No. consultations conducted with affected parties, other stakeholders, and vulnerable groups	Review of reports on consultations by project and its partner	Bi-annually	Environment & Social Specialist and project implementing partners
7	Type of issues/concerns raised and discussed at consultative meetings	Review of reports on consultations	Quarterly	Environment & Social Specialist and project implementing partners
8	Type of decisions made based on consultation outcomes	Review of progress reports	Quarterly	Environment & Social Specialist and project implementing partners
9	Feedback sessions conducted with affected parties, other stakeholders, and vulnerable groups to report on the decisions made	Review of progress reports, and focus group discussions and individual interviews with a cross-section	Bi-annually	Environment & Social Specialist and project implementing partners
10	Level of satisfaction among affected parties, other stakeholders and vulnerable groups on the consultative process and its outcomes	Feedback surveys, focus group discussions and individual interviews with a cross-section	Quarterly	Environment & Social Specialist and project implementing partners
11	No. grievances/complaints received and resolved	Review of progress reports and GRM database	Quarterly	Environment & Social Specialist and project implementing partners
12	Level of efficiency and responsiveness of GRM	Review of the records of GRC meetings and decisions	Bi-annually	Environment & Social Specialist and project implementing partners
13	Level of satisfaction among affected parties, other stakeholders, and vulnerable groups on the overall performance of GRM	Focus group discussions, feedback surveys and individual interviews with a cross-section of parties who reported grievances	Annually	Environment & Social Specialist and project implementing partners

11.2 Reporting Back to Stakeholder Groups

The results of the stakeholder engagement activities including results and outcomes of monitoring and evaluation of SEP implementation will be reported back to the stakeholders through websites and/or formal communications.

11.3 Reporting to The World Bank

The RPMU and CPMD will collate all monitoring and evaluation results and produce bi-annual reports to be submitted to the World Bank. SEP monitoring will be part of the project Monitoring reports submitted to the World Bank.

12. Reference

- Amendment to Local Government Act (Act no: 24/2019)
- Environmental Impact Assessment Regulations (Regulation No: 2012/R-27)
- National Bureau for Statistics (2014). Census Analytical Report, Male', Maldives

- Palerm, J. R. (2000). An empirical-theoretical analysis framework for public participation in environmental impact assessment. *Journal of Environmental Planning and Management*, 43(5),581-600. doi:10.1080/713676582
- Right to Information Act (Act no: 1/2014)
- The World Bank (2018). *Environmental and Social Framework*. Washington DC: International Bank for Reconstruction and Development
- Webler, T. (1995). “Right” discourse in citizen participation: An evaluation yardstick. In O. Renn, T. Webler, & P. M. Wiedemann (Eds.), *Fairness and competence in citizen participation: Evaluating models for environmental discourse* (pp. 35-87). Dordrecht, Netherlands: Kluwer Academic.
- United Nations Development Programmed (2014) “Women in public life in the Maldives”, Male’, Maldives.