

Maldives: Climate Change Adaptation Project

*Process Framework for Regulated Access to Designated Protected
Area in Fuvamulla and Hithadoo Islands*

January 23, 2015

Maldives: Climate Change Adaptation Project

Process Framework for Regulated Access to Designated Protected Area in Fuvamulla and Hithadoo Islands

Executive Summary

1. *This Process Framework describes Climate Change Adaptation Project (CCAP) requirements to address social impacts from restrictions of access to natural resources as per the World Bank's Involuntary Resettlement Policy (OP 4.12). The objectives of this Framework are to avoid, minimize, or mitigate potentially adverse impacts of restrictions of access to natural resources, and ensure that affected communities are consulted with and participate in meaningful ways in project activities affecting them. The Framework describes the requirements and planning procedures for grant applicants and subsequently grantees in the preparation and implementation of related projects, as well as the role of CRES in ensuring compliance with this framework.*
2. *There are four main components in CCAP that have the common theme of intent to contribute to delivering climate resilient island development. The components include (i) community based wetland management in Hithadoo and Fuvamullah; (ii) coral reef component ; (iii) solid waste management; and (iv) building capacities of the atoll/island councilors in climate resilient planning.*
3. *CCAP project component 1 on wetland triggers the World Bank's policy on Involuntary Resettlement for involuntary restrictions of access to legally designated parks and protected areas or support efforts to improve enforcement of existing restrictions. This component supports the development and implementation of management plans for protected areas.*
4. *There is will be no impact in Fuvamulah as no portion of this wet land is either under cultivation or sand mining. In Hithadoo however, some part of the wetland is under taro cultivation and illegal sand mining is also takes place in certain parts of wetland. Fencing will be carried out but area under taro cultivation will not be fenced but sand mining will not be allowed and as a result there will be loss of livelihood for those involved in sand mining.*
5. *There is no existing regulatory framework for charging Maldivian nationals. It is understood that non-Maldivian nationals can be charged for access to protected areas (Hanifaru bay is a case in point). In Hithadoo there is an existing regulation relating to the above matters and the regulation specifies that permission for any (relevant) activity in the area shall be given by the Addu City Council subject to compliance with the regulation and the EPA mandate for protected areas. Fuvamullah also has a regulation that prohibits mining of sand and corals. These regulations however need to be reviewed and revised in support of the planning and delivery of management for sustainable use of the natural biological resources of the protected areas (policing, fines, revenue generation, etc.).*
6. *Participation of affected communities is the key element of the Process Framework. The Safeguard Coordinator consulted the Island administration and community members while drafting the process framework. The draft process framework was shared with the local community members and other relevant stakeholders. Based on the consultations, a final Framework has been prepared. The Framework includes project activities, characteristics of restrictions, their impacts, and mitigation measures. The Framework with input from local communities is supported by social analysis carried out during the project preparation.*
7. *The eligibility criteria will determine which groups and persons are eligible for assistance and mitigation measures. As per social assessment carried out as part of project preparation, the community*

members who are eligible to be assisted under this framework are community members (i) losing their livelihood / sources of livelihood such as sand miners or taro cultivators; and (ii) frequenting the wetland for recreational purposes. The criteria will be further refined during implementation in consultation with the community as part of a participatory implementation process. As part of project ESAMF, entitlement framework has been prepared with an objective is to improve or restore, in real terms their livelihoods while maintaining the sustainability of the protected area. The measures to offset losses include:

- Special measures for the recognition and support to natural resources.
- Transparent, equitable, and fair ways of more sustainable sharing of the resources;
- Access to alternative resources or functional substitutes (for instance use of concrete blocks instead of sand in construction);
- Alternative livelihood activities to be finalized in consultation with the community during implementation. The options explored during project preparation includes providing employment to affected community members in the project area as nature guides; rangers; guards; and various business opportunities as part of eco- tourism.
- Health and education benefits;
- Develop the implementing strategies to communicate real time information specifically for economically weaker section.

For women members, specific measures include:

- Undertake literacy programs as built- in activities coordinated with literacy programmes.
- Formation of women groups around specific project areas.
- Share information about the project benefits with local community.
- Develop audio-visual aids and documentary for training programs about the project for illiterate women groups
- Conduct leadership training for women members of commodity groups.
- Organize training on technologies
- Provide opportunities of exposure or study visit to women's group to develop their leadership capacity
- Inform women groups regarding proposed construction works. Identify women interested to work; assess their skills and involve them as per their capabilities.

8. The implementation will be participatory in order to determine restrictions, management arrangements, and measures to address impacts on local communities. The roles and responsibilities of various stakeholders and the methods of participation and decision making have been detailed out in the framework. Decision making will include the establishment of representative local structures, use of open meetings, and involvement of existing local institutions. Methods of consultation and participation will be in a form appropriate to local needs. The implementation activities include:

- Demarcation of wetland areas and mapping of existing resource use in the wetland areas.
- Sensitization and awareness building activities to engage the key stakeholders in the participatory process.
- Development and approval of CBWMPs based on the approved land use plans through a participatory process involving consultation with relevant stakeholders.
- Prevention of unplanned reclamation, illegal waste dumping, contamination of surface water, unsustainable harvesting of mangroves and other activities which are detrimental to the wetlands.

9. *There are two wetland areas on Fuvahmulah, Dhanimagu-Kilhi and Bandaara-Kilhi. Separate Management Plans with their own objectives and indicators of success will be developed during the implementation. Key elements of the plans should include:*

- *Controlling solid waste:*
- *Fencing of the protected area*
- *Zoning*
- *Green belts*
- *Regulating cropping*
- *Development of basic infrastructure for ecotourism (nature trails, observation hides, interpretation centre, visitor convenience services).*
- *Training of local community nature guides.*

10. *The framework will be implemented at the Island level but will be guided and monitored by Environmental and Social (E&S) Coordinator of PMU. The coordinator will report to the Project Manager and will work closely with the Wetlands Coordinator.*

11. *The draft Process Framework will be disclosed in country to inform the potentially affected community about the project; its impact and mitigation measures suggested and to get their input on the framework. The final Framework will again be disclosed locally as well as at the MEE Web site.*

12. *CCAP and implementing agency are responsible for complying with this Framework. The project during implementation will review and refine the Plan of Action with the informed and meaningful participation of affected communities. The implementing agency will ensure that local communities are consulted and participate in culturally appropriate ways during implementation. They will avoid adverse impacts on affected communities or, where this is not possible, develop with the informed participation of affected community's measures to mitigate such impacts.*

13. *A three tier grievance mechanism will be established which will be accessible to all community members. The Island Council will be the first level of contact for any aggrieved person. A Community Advisory Board will be created and complaints received by the Island Council will be sent to the Community Advisory Board for advice. In case the aggrieved person is not satisfied, he or she can approach Ministry of Environment and Energy. The E&S Safeguards Coordinator in the PMU will be the contact person in MEE. In case the issue is not resolved, the aggrieved person has the option of approaching judiciary. In cases where vulnerable persons are unable to access the legal system, the Attorney General's office will provide legal support to the vulnerable person(s). The PMU will assist the vulnerable person(s) in getting this support from the Attorney General's Office. The PMU will also ensure that there is no cost imposed (such as for travel and accommodation) on the aggrieved person if the person belongs to the vulnerable groups. The verdict of the judiciary will be final.*

14. *The project team lead by the E&S Coordinator has undertaken number of consultations during the project preparation. Further consultations will be carried out as part of number of consultancies for wetland management. These will be duly documented in the respective outputs of the consultancies. In addition, the technical coordinators, E&S Coordinator and the Conservation Officers will undertake continuous consultations with stakeholders and report as part of monitoring.*

15. *Monitoring efforts will include the regular inspection to determine compliance with mitigation measures with respect to community facilities, disturbance, land taking, and process framework. Day to day monitoring will be carried out by the conservation officers at Island level along with the community representatives.*

Maldives: Climate Change Adaptation Project

Process Framework for Regulated Access to Designated Protected Area in Fuvamulla and Hithadoo Islands

1. Process Framework for Involuntary Restrictions

This Process Framework describes Climate Change Adaptation Project (CCAP) requirements to address social impacts from restrictions of access to natural resources as per the World Bank's Involuntary Resettlement Policy (OP 4.12). The objectives of this Framework are to avoid, minimize, or mitigate potentially adverse impacts of restrictions of access to natural resources, and ensure that affected communities are consulted with and participate in meaningful ways in project activities affecting them. The Framework describes the requirements and planning procedures for grant applicants and subsequently grantees in the preparation and implementation of related projects, as well as the role of CRES in ensuring compliance with this framework.

2. The Project:

There are four main components in CCAP that have the common theme of intent to contribute to delivering climate resilient island development. All three components build on activities initiated and lessons learned from CCTF-I. All four components are interdependent and also require evidence-based and target-driven planning processes to deliver enhanced resilience to climate change. The integrative vision of strengthening climate resilience through the CRES Project is given below:

- The wetland component will build on the work done in CCTF-I. The CBWMPs have already been developed for one wetland in Hithadhoo and two in Fuvahmulah under CCTF-I (the wetland in Hithadhoo includes extensive coral reefs while reefs around Fuvahmulah are limited). Wetlands conservation in Hithadhoo assumes the need for ecosystem-based adaptation of coral reefs if the wetland is to be sustained and requires that these reefs be managed to maximize the opportunities for this adaptation. The wetland in Fuvahmulah requires a planning approach that is not dependent on ecosystem-based adaptation of coral reefs. The drainage works and tidal gate hard engineering works developed and delivered under CCTF-I demonstrate partial solutions to climate resilience in the wetlands in the absence of coral reefs or should coral reefs not adapt to climate change.
- The coral reef component provides a monitoring framework necessary to support evidence-based management that optimizes opportunity for ecosystem-based adaptation to sustain wetlands and coastal infrastructure.
- The SWM component recognizes that wetlands and the coral reef ecosystem functions are impaired (smothered and polluted) by inappropriate disposal of solid waste. Effective management of solid waste reduces pressure on the ecosystem function of wetlands and coral reefs. Effective management of solid waste, and maintenance of the carbon sequestration function of wetlands both contribute to a reduction in GHGs that cause human induced climate change.
- The mainstreaming component is broader in nature and will scale up efforts in building capacities of the atoll/island councilors in climate resilient planning primarily in the above three areas building on the efforts of CCTF-I. Additional areas of adaptation and mitigation such as water resources management and renewable energy will also be considered.

All four components will deliver climate resilience in respect of development and the livelihoods that depend on this resilient development..

3. CCAP and Access Restrictions

CCAP project component 1 triggers the World Bank's policy on Involuntary Resettlement for involuntary restrictions of access to legally designated parks and protected areas or support efforts to improve enforcement of existing restrictions. This component supports the development and implementation of management plans for protected areas.

Implementation of the new zonation system and protection regime in Hithadhoo and Fuvahmulah protected wetland areas under Component 1 will result in regulated access to the wetlands; will prevent encroachment and waste dumping to facilitate the enforcement of the national laws regulating protected areas. Rangers will be employed under the Island PMUs to the patrol protected areas but will not have powers to arrest or remove people from those areas or impose fine or penalty on people those determine to be violating the laws regulating protected areas. Access to protected areas will be regulated through entry fees and / or controlled access points. These will be reviewed and evaluated in respect of legal/environment and social safeguards as the plan is operationalized and may require additional regulation(s).

Impacts:

There is will be no impact in Fuvamulah as no portion of this wet land is either under cultivation or sand mining. In Hithadoo however, some part of the wetland is under taro cultivation. But those who are cultivating taro will not be impacted as fencing will exclude the areas currently under cultivation but no new cultivation will be allowed (table 5.2 in ESAMF). Sand mining will not be allowed and this will result in loss of livelihood for those involved in sand mining (table 5.11). Sand is mined for construction purpose and ban on mining; fencing of protected area and ban on vehicle movement came up very clearly in community consultation. The ESAMF captures all these and under entitlement framework it is suggested that loss of livelihood needs to be compensated. ESAMF also mentions that alternative mining sties be identified so that those mining sand in the wetland. Government of Maldives is also encouraging use of concrete blocks for construction rather than sand.

In case of Hithadoo, the planning process described in this Framework will be followed, including a Plan of Action during implementation. In any case, adverse social impacts on local communities should be avoided or appropriately mitigated as per the entitlement framework given in ESAMF.

4. In Country Regulatory Framework:

There is no existing regulatory framework for charging Maldivian nationals. It is understood that non-Maldivian nationals can be charged for access to protected areas (Hanifaru bay is a case in point).

Hithadhoo: There is an existing regulation relating to the above matters and the regulation specifies that permission for any (relevant) activity in the area shall be given by the Addu City Council subject to compliance with the regulation and the EPA mandate for protected areas. This regulation will need to be reviewed and revised in support of the planning and delivery of management for sustainable use of the natural biological resources of the protected areas.

Fuvahmulah: There is an existing regulation prohibiting the following:

- Any type of fisheries activity
- Mining of sand, aggregate and coral
- Removal, catching or killing of any living in the protected areas of wetland, water body, beaches and reef
- Putting in or taking anything
- Removal of birds or any other fauna and their eggs or destroying the nests
- Cutting down and uprooting of trees
- Any type of burning activities.

This regulation will need to be reviewed and revised in support of the planning and delivery of

management for sustainable use of the natural biological resources of the protected areas (policing, fines, revenue generation, etc.).

5. Preparation of Process Framework

Participation of affected communities is the key element of the Process Framework. The Safeguard Coordinator consulted the Island administration and community members while drafting the process framework. The draft process framework was shared with the local community members and other relevant stakeholders. Based on the consultations, a final Framework has been prepared. The Framework includes project activities, characteristics of restrictions, their impacts, and mitigation measures. The Framework with input from local communities is supported by social analysis carried out during the project preparation.

6. Plan of Action

Criteria for eligibility of affected persons: The eligibility criteria will determine which groups and persons are eligible for assistance and mitigation measures. As per social assessment carried out as part of project preparation, the community members who are eligible to be assisted under this framework are community members (i) losing their livelihood / sources of livelihood such as sand miners or taro cultivators; and (ii) frequenting the wetland for recreational purposes. The criteria will be further refined during implementation in consultation with the community as part of a participatory implementation process. The refinement of eligibility criteria may include exclusion of certain persons or groups from assistance because their activities are clearly illegal, unsustainable, and destructive (e.g. poachers, dynamite fishers). The criteria may further be refined to distinguish between persons utilizing resources opportunistically and persons using resources for their livelihoods.

Measures to assist the affected persons: The objective is to improve or restore, in real terms their livelihoods while maintaining the sustainability of the protected area. During the consultation process, community members agreed to restrictions without any mitigation measures as they may see the long-term benefits of improved natural resource management. The measures to offset losses include:

- Special measures for the recognition and support to natural resources.
- Transparent, equitable, and fair ways of more sustainable sharing of the resources;
- Access to alternative resources or functional substitutes (for instance use of concrete blocks instead of sand in construction);
- Alternative livelihood activities to be finalized in consultation with the community during implementation. The options explored during project preparation includes providing employment to affected community members in the project area as nature guides; rangers; guards; and various business opportunities as part of eco- tourism.
- Health and education benefits;
- Develop the implementing strategies to communicate real time information specifically for economically weaker section.

For women members, specific measures include:

- Undertake literacy programs as built- in activities coordinated with literacy programmes.
- Formation of women groups around specific project areas.
- Share information about the project benefits with local community.
- Develop audio-visual aids and documentary for training programs about the project for illiterate women groups
- Conduct leadership training for women members of commodity groups.
- Organize training on technologies

- Provide opportunities of exposure or study visit to women's group to develop their leadership capacity
- Inform women groups regarding proposed construction works. Identify women interested to work; assess their skills and involve them as per their capabilities.

These measures should be in place before restrictions are enforced, although they will be implemented as restrictions are being enforced.

7. Implementation Process:

The implementation will be participatory in order to determine restrictions, management arrangements, and measures to address impacts on local communities. The roles and responsibilities of various stakeholders and the methods of participation and decision making are described in subsequent sections. Decision making will include the establishment of representative local structures, use of open meetings, and involvement of existing local institutions. Methods of consultation and participation will be in a form appropriate to local needs.

(i) *Decision making:*

Decision making will be based on well-founded understandings of socioeconomic contexts of the islands. If required, further detailed assessment can be carried out for a more in-depth understanding of: (a) the cultural, social, economic, and geographic setting of the communities in the project areas; (b) the types and extent of community use of natural resources, and the existing rules and institutions for the use and management of natural resources; (c) identification of territories and customary use rights; (d) local and indigenous knowledge of biodiversity and natural resource use; (e) the threats to and impacts on the biodiversity from various activities in the area, including those of local communities; (f) the potential livelihood impacts of new or more strictly enforced restrictions on use of resources in the area; (g) communities' suggestions and/or views on possible mitigation measures; (h) potential conflicts over the use of natural resources, and methods for solving such conflicts; and (i) strategies for local participation and consultation during project implementation, including monitoring and evaluation.

(ii) *Demarcation of wetland areas and mapping of existing resource use in the wetland areas.*

This will entail a detailed survey of the wetland area to define habitat types and the beneficial uses that the different parts of the wetland support. The information will be managed by use of a Geographic Information System (GIS) within Environmental Protection Agency (EPA). The result of the intervention will provide a quantitative baseline against which to monitor the effectiveness of implementation of management and conservation measures.

(iii) *Sensitization and awareness building activities to engage the key stakeholders in the participatory process.*

Community consultations will be held to engage stakeholders in the preparation and implementation of the plan. The activity will help increase the awareness of the stakeholders regarding the project and also of the need for a participatory process.

(iv) *Development and approval of CBWMPs based on the approved land use plans through a participatory process involving consultation with relevant stakeholders.*

The plans will be prepared in consultation with the relevant stakeholders. This process will define the objectives of the Management Plan, the roles and responsibilities of the principal actors and will also provide the regulatory mechanisms to enable the Management Plan to be implemented.

(v) *Prevention of unplanned reclamation, illegal waste dumping, contamination of surface water, unsustainable harvesting of mangroves and other activities which are detrimental to the wetlands.*

These are the tools by which the wetland area will be managed. Each one is designed to manage the external pressures on the wetland which are leading to a deterioration of the ecological quality of the wetlands themselves and enabling the prescribed beneficial uses of the wetland to be improved and maintained.

(vi) *Implementation of the management plan*

There are two wetland areas on Fuvahmulah, Dhanimagu-Kilhi and Bandaara-Kilhi. Separate Management Plans with their own objectives and indicators of success will be developed during the implementation. Key elements of the plans should include:

- Controlling solid waste:
- Fencing of the protected area
- Zoning
- Green belts
- Regulating cropping
- Development of basic infrastructure for ecotourism (nature trails, observation hides, interpretation centre, visitor convenience services).
- Training of local community nature guides.

8. Implementation Arrangement

The project management unit (PMU) has an Environmental and Social (E&S) Coordinator who will play a central role of managing safeguards requirements. The coordinator will report to the Project Manager and will work closely with the Wetlands Coordinator. The E&S Coordinator will be responsible for ensuring the preparation of plan of action and its implementation. The coordinator will also liaise with other agencies, contractors and engineering supervisors at the island level to implement the mitigation measures, monitoring and evaluation of implementation and report on compliance and status of performance indicators. The field level responsibilities to monitor and report will lie with the Conservation Officers posted at Fuvahmulah and Addu. The E&S Coordinator will take the leadership to orient staff and implementing partners of the ESAMF and process framework and how to operationalize it on the ground. The Conservation Officers at the island level will also be first level of contact for any grievance / feedback for the community.

9. Disclosure

The draft Process Framework will be disclosed in country to inform the potentially affected community about the project; its impact and mitigation measures suggested and to get their input on the framework. The final Framework will again be disclosed locally as well as at the MEE Web site..

10. Roles and Responsibilities

CCAP and implementing agency are responsible for complying with this Framework. The project during implementation will review and refine the Plan of Action with the informed and meaningful participation of affected communities. The implementing agency will ensure that local communities are consulted and participate in culturally appropriate ways during implementation. They will avoid adverse impacts on affected communities or, where this is not possible, develop with the informed participation of affected community's measures to mitigate such impacts.

Implementing agency will also be responsible for reporting to both affected communities and CCAP on project progress and any unexpected and unintended events affecting local communities. CCAP is responsible for the implementation of this overall Framework. The responsibilities include:

- Inform applicants and other stakeholders, including local communities and organizations, of the Process Framework and policy requirements;

- Assist applicants, and subsequently grantees, in the implementation of the Process Framework and policy requirements;
- Screen for projects which may affect local communities through restrictions of access to natural resources;
- Assess the adequacy of the assessment of project impacts and the proposed measures to address issues pertaining to restrictions of access to natural resources.
- Assess the adequacy of the consultation process during preparation and implementation; and
- Review and approve project-specific action plans prepared during implementation.

11. Grievance Redress Mechanism

A three tier grievance mechanism will be established which will be accessible to all community members. The Island Council will be the first level of contact for any aggrieved person. A Community Advisory Board will be created and complaints received by the Island Council will be sent to the Community Advisory Board for advice. In case the aggrieved person is not satisfied, he or she can approach Ministry of Environment and Energy. The E&S Safeguards Coordinator in the PMU will be the contact person in MEE. In case the issue is not resolved, the aggrieved person has the option of approaching judiciary. In cases where vulnerable persons are unable to access the legal system, the Attorney General's office will provide legal support to the vulnerable person(s). The PMU will assist the vulnerable person(s) in getting this support from the Attorney General's Office. The PMU will also ensure that there is no cost imposed (such as for travel and accommodation) on the aggrieved person if the person belongs to the vulnerable groups. The verdict of the judiciary will be final.

The project specific Grievance Mechanism is summarized below:

Tiers of Grievance Mechanism	Nodal Person for Contact	Contacts, Communication and Other Facilitation by Project	Timeframe to address grievance
First Tier: Island Council /(Community Advisory Board)	Island Council is the first level of contact in case of any grievance. Once the Community Advisory Board has been created, it will be the first level of contact in specific grievance related to the management of the protected area or any other issue related to land; access and adverse impacts on the community.	<ul style="list-style-type: none"> • In the Administration Area of the Protected Area there will be an Information Board listing the names and contact telephones. • In the Administration Area of the Protected Area it will be taken one public meeting with pre-decided schedule organized unless every three months. 	15 days
Second Tier: Ministry of Environment and Energy (MEE) – ESDD of the Project Management Unit	For wetland protection, will forward the grievance to the ESDD Coordinator of the PMU.	<ul style="list-style-type: none"> • Only after exhausting the first and second tiers. • Website advertisement, public notices in print media. • The aggrieved person can attend the 	60 days

(PMU).		<p>hearing by PMU in person. The ESDD Coordinator will be responsible to ensure that there is no cost imposed (such as for travel, etc.) on the aggrieved person if the person belongs to the vulnerable groups.</p> <ul style="list-style-type: none"> • Further, the project will assist the vulnerable aggrieved person if such a person is requested to attend the hearing in person. 	
Third Tier: Judiciary Power / Assistance to Vulnerable Persons beyond the Project's Grievance Redress Mechanism	Judges will remain as an option for an aggrieved person and/or community in case that the others tiers haven't been effective.	<ul style="list-style-type: none"> • Only for vulnerable person(s) as per the grievance mechanism of the project. • Only after exhausting at least both of the second and third tiers of the grievance mechanism. 	As per established judicial procedures

12. Consultation

The project team lead by the E&S Coordinator has undertaken number of consultations during the project preparation. Further consultations will be carried out as part of number of consultancies for wetland management. These will be duly documented in the respective outputs of the consultancies. In addition, the technical coordinators, E&S Coordinator and the Conservation Officers will undertake continuous consultations with stakeholders and report as part of monitoring. The issues raised during the consultation are the following:

- Adequate communication between PMU and the City Council as council are responsible to answer any questions raised by the local community
- Local community is showing a lot more interest in the area and supporting the conservation efforts.
- Community see illegal activities such as sand mining and waste dumping take place as a major impediment towards conservation and requested for more efforts and plan to manage the protected area.
- Island Councils and community is happy with the Environment and Social Grievance Mechanism used on CCTF I and has no issue of using the same Environment and Social Grievance Mechanism as CCTF I in the current project.
- Participants request that project should arrange an easy mechanism for the public to get information about the project activities. Public interest in the area is increasing day by day and more people like to know what's happening in the protected areas. Also request that project includes more outreach programs.
- Regarding the regional waste management pre-feasibility study, it was highlight that waste management is a really big environment and health issue faced by the islanders.
- It was noted by the participants that there is a big need for awareness regarding all project components. At the moment very small number from community have information about the works carried out in the protected area. Participants requested for a copy of wetland management plan and information about the livelihood opportunities and limitations that may come with implementation of the protected area.

13. Monitoring and Audit

Monitoring efforts will include the regular inspection to determine compliance with mitigation measures with respect to community facilities, disturbance, land taking, and process framework. Day to day monitoring will be carried out by the conservation officers at Island level along with the community representatives.

A monitoring report will be prepared at the end of construction. This report will contain environmental and social audit of ESMP implementation as well as action plan of process framework. If necessary, it will identify any remaining environmental or social problems that need to be addressed before final payments are released to the contractors.

Simplified monitoring reports that use photographs to report on ESMP and action plan of process framework implementation will be adopted. These are to be prepared by the Conservation Officers and submitted to E&S Coordinator on a monthly basis. E&S Coordinator will use these reports to determine any significant issues he/she will need to check and correct. E&S Coordinator will also consolidate the reports submitted by Conservation Officers, as well as his/her own supervision reports and submit to Bank trimesterly.