



Draft V9

PREP II

# Ebeye Seawall Project Stakeholder Engagement Plan



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Prepared by

DIDA and PREP II Staff

***INTERNAL DOCUMENT***

Not to be circulated beyond PREP II / DIDA / WB without prior approval

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# 1. INTRODUCTION

## 1.1. Distribution

This Stakeholder Engagement Plan (SEP) is an internal PREP II document and is not intended for disclosure wider than PREP II, DIDA, World Bank staff, and Contractors.

If any party wishes to disclose this document or material enclosed herein to any other party, prior approval must be obtained from the DIDA Safeguards Advisor or the DIDA Director.

## 1.2. Purpose of this Document

This SEP is provided to assist PREP II personnel with preliminary stakeholder engagement and consultation on the Ebeye Seawall Project which is being undertaken as Component 2.1 of Prep II.

In relation to the Pre-Design phase of the Project, this SEP is intended to assist PREP II personnel in their preliminary discussions with various stakeholders, where PIU and DIDA are required to “identify issues for inclusion and resolution in the EIA<sup>1</sup>.”

The SEP and the information collected will be provided to the Design Consultant to assist with stakeholder engagement as part of ESIA preparation.

Stakeholder engagement and Grievance Redress Mechanisms associated with “**other**” PREP II Components are set out in in Annex of this SEP.

Consultation in this context is all about helping stakeholders understand the following matters:

1. The rationale for the project;
2. What the project potentially involves;
3. How it might impact them; and
4. How can they can contribute to the outcome.

The following sections set out talking points for each of these items – in each case the discussion starts at a high level and drills down to detail. Each stakeholder engagement event will need to be considered in terms of the level of detail discussed – but as a basic rule of thumb it can’t be assumed that the stakeholder fully understands the political or technical framework.

Following these sections dealing with the environmental and social issues, the document sets out summary information on the safeguards process generally and the Grievance Redress Mechanism process.

This Plan also acts as an Environmental and Social Impact risk screening report for Ebeye, which is intended to inform the Design TOR, and liaison with the PIU and design teams.

## 2. PROJECT RATIONALE

RMI and WB has identified that<sup>2</sup>:

*“Coastal protection in Ebeye [is] a high priority given the density of population, the concentration of both public and private assets and the significance of coastal hazards that is currently evident.”*

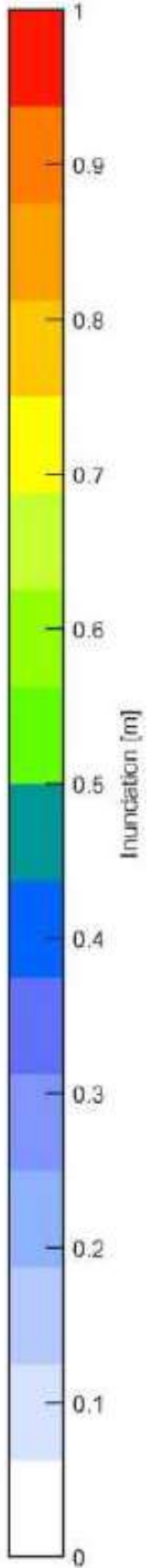
The Project is intending to address this priority area by constructing a seawall.

<sup>1</sup> According to the PREP II Project Flowchart 1, these preliminary discussions require”

<sup>2</sup> From February 2016 Aide-Memoire for the Climate Resilience Project Scoping Mission

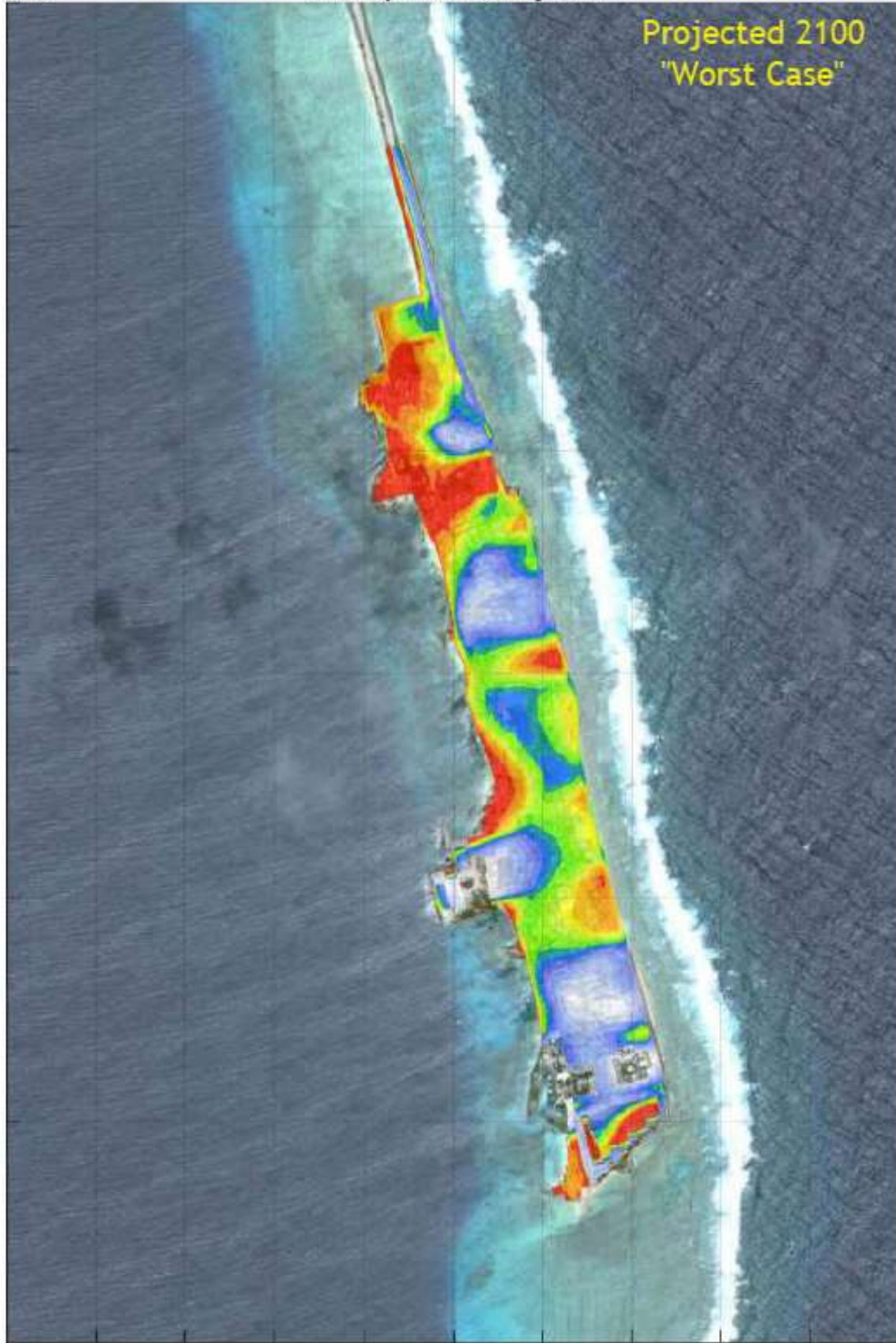
  
 $\times 10^5$

### Maximum inundation modeled with a return period of 10 years



**Maximum inundation modeled with a  
return period of 10 years**

$\times 10^5$



The particular risk to people and property on Ebeye is shown in inundation diagrams set out in the following pages. By 2100, if no action is taken:

- Inundation may lead to dramatic consequences, with water (flood) depths reaching 1 m, for events with a return period of 10 years (or larger), due to swell and typhoon events.
- Storm-induced coastal erosion (shoreline retreat) of up to about 10 m may result.

Sea-level rise induced erosion (shoreline retreat) of around 1.5 - 2.5 m. Such levels of erosion and shoreline retreat will need to be accommodated by available land, however in Ebeye, in many locations, space is very limited, with houses and buildings already built very close to the shoreline.

So, in terms of stakeholder engagement we are:

*“Designing and constructing a seawall at Ebeye to protect people, and public and private assets from the effects of coastal erosion and flooding; whilst avoiding as far as possible any adverse impacts of construction”*

The **primary focus** of the project is the protection of people and assets from the impacts of erosion and flooding.

A **secondary consideration** is the provision of amenities for the local community (within the overall Project budget cap).

These priorities critically influence messaging and stakeholder engagement associated with the Project as discussed in this SEP.

### 3. PROJECT DESCRIPTION

#### 3.1. Key Messages

For the purposes of stakeholder engagement, it is important to emphasize at this stage that:

Project design is not yet finalized, and all options are being considered.

and

The budget is fixed so any additions to the project in one area will necessarily mean reductions in other areas.

#### 3.2. Project Uncertainty

Whilst it might be reasonable to consider that Project funding is “in place” because the GCF Board has indicated its approval, until this is formalized there remains the possibility that the GCF funding might not eventuate and the consequences of this unavailability of funding need to be considered, from a stakeholder engagement risk management perspective.

#### 3.3. Design

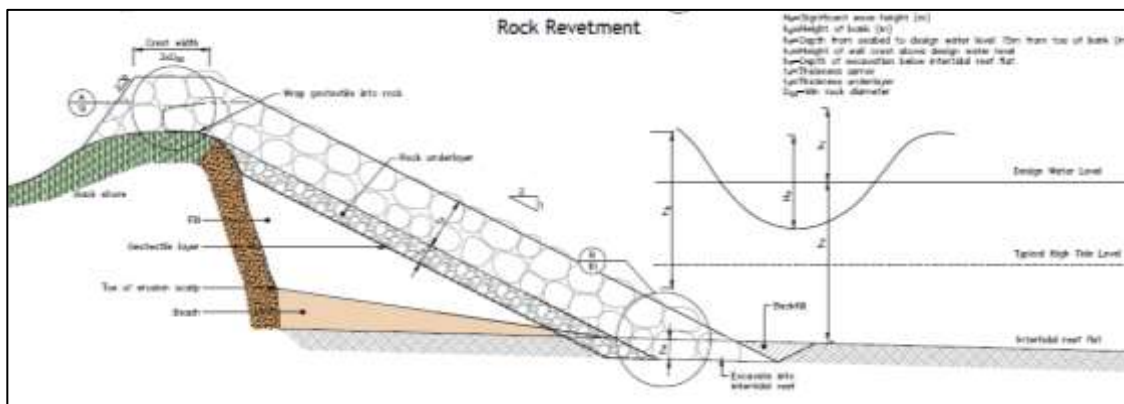
Coastal flooding information and a coastal risk assessment will inform the choice of final design and locations for adaptation. The basic elements are likely to be as follows (from Deltares report).

- The Design Process is iterative – will not be a fixed design from the outset, and consultation will prepare people to be involved in an iterative process.

- Location most likely to extend from causeway to the southeast corner of Ebeye Island, but may extend further subject to sufficient budget.

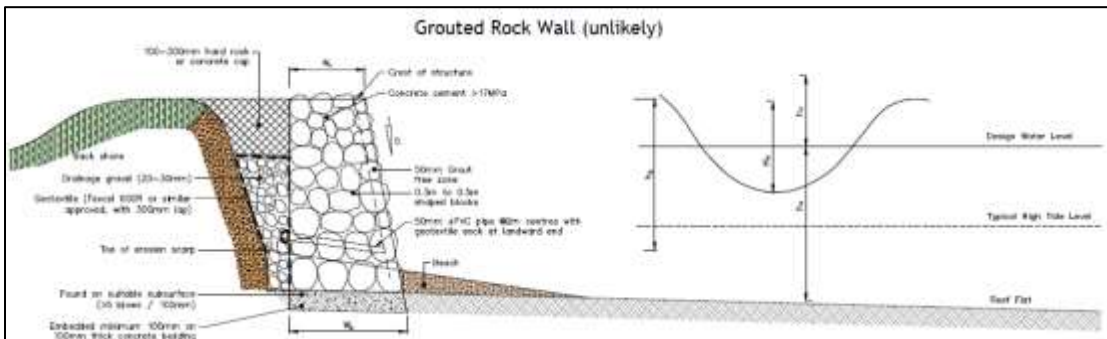
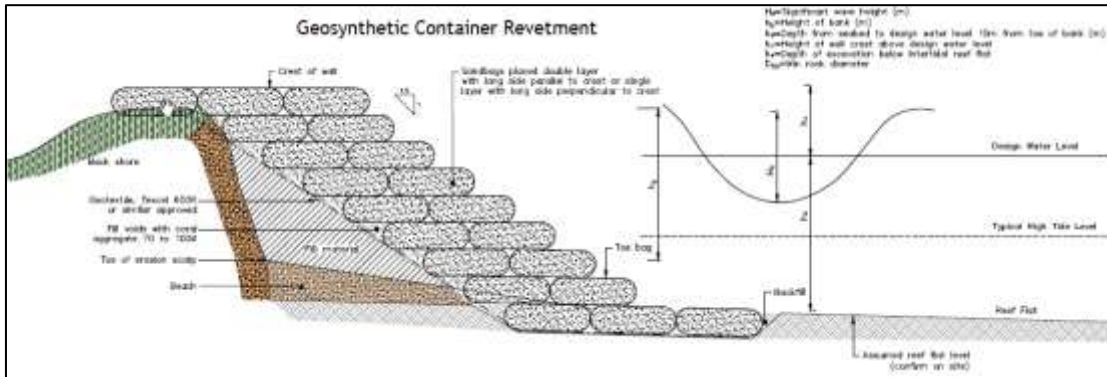
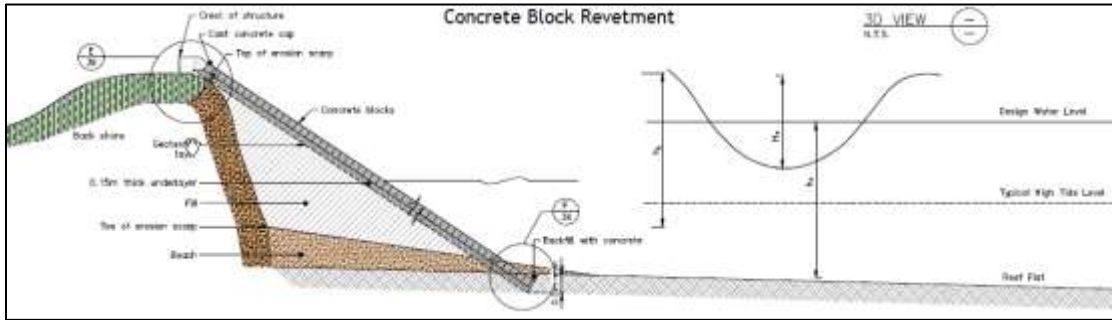


- Construction material most likely to be rock and/or concrete – with construction rocks imported from offshore – no locally sourced materials will be used.
- Final design a long way off – but likely to be conventional rock revetment given need for proven design, reliability and likely lowest cost:

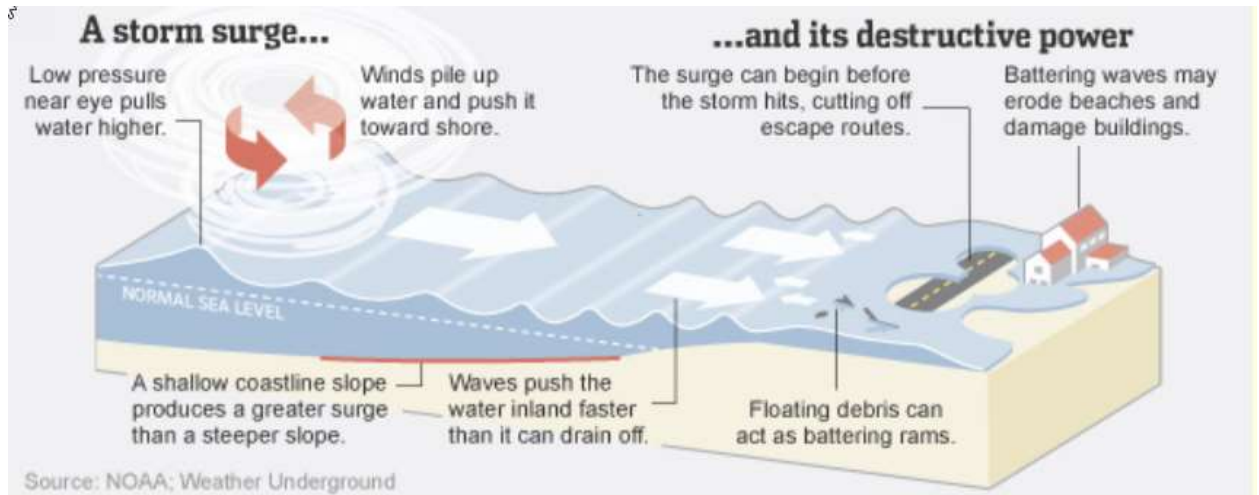




- Alternative options will be considered including:



- A seawall works by separating land and water areas. Seawalls are normally very massive structures because they are designed to resist the full force of waves and storm surge.
- Storm surge has been identified as the design worst-case cause of likely inundation on Ebeye



- The Ebeye seawall may be up to 14 feet (4.2 metres) above mean sea level (12 feet high above the reef). Measures will be incorporated to reduce visual impacts (if necessary).
- Seawall design is critically tied to the overtopping/flooding rate.
- Overtopping is water that splashes above/runs over and landward of the line of protection, flooding the land as a result of waves running up the face of the seawall (including swash through an armor rock wall)

## What is overtopping?




Overtopping is water that splashes above and landward of the line of protection.



Lajes, Azores Breakwater (image from Jeff Melby)

- Seawall structures designed to prevent all overtopping under severe storm conditions will be too expensive to build.

- The acceptable rate of overtopping represents a balance between costs associated with increased protection and greater damages associated with less protection, and this will be an important design factor for Ebeye– this will be a matter for stakeholder engagement.
- The wall will be designed to protect Ebeye from a certain sized storm event (for example a 1 in 30 year or a 1 in 50 year storm event with selection of the final level to be derived from the detailed design phase.
- Detailed design variables will include:
  - Distance from houses – creation of buffer zone from land-side activities
  - Height – relates to acceptable overtopping frequency vs visual impact
  - Ease of construction
  - Public and Worker safety - of paramount importance
  - Beach access/pubic amenities

### 3.4. Area Plan

To come once broad design options selected:

Describe location and, where possible, include a map of the project site(s) and surrounding area, showing communities and proximity to sensitive sites, and including any worker accommodation, lay-down yards, or other temporary activities that also may impact stakeholders.

## 4. PROJECT TIMELINE

Pre-design	Now until March 2019
Design	March 2019 – February 2020
Construction works commence	March 2020

## 5. POTENTIAL ADVERSE IMPACTS

The following potential impacts were identified in the ESMF and during initial site walkovers.

### 5.1. Material quantities and sourcing

Materials sourcing has been identified as a potential high environmental risk based around the volumes required. Quantities are discussed initially in this section, followed by a screening of associated environmental effects.

#### 5.1.1. Quantities

Estimated [order of magnitude] volumes of rock are set out as follows (based on Deltares report Figure 9.7 for Gradient 1:1.5):

	Volume per linear m <sup>3</sup>	Length m	Total Volume m <sup>3</sup>
Armor Rock	29.3	1500	43950
Underlayer	4.9	1500	7350

Assumed fill volumes based on wall distance from existing shoreline (4m high wall):

Distance from shoreline	Volume per linear m <sup>3</sup>	Length m	Total Volume m <sup>3</sup>
10	40	1500	60000
5	20	1501	30020

2.5	10	1502	15020
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In summary requirements are:

- Armour Rock 45,000 m<sup>3</sup>
- Underlayer 7,500 m<sup>3</sup>
- Fill zero-10,000 m<sup>3</sup>

### 5.1.2. Issues Associated with Sourcing the Materials<sup>3</sup>

RMI PREP II has been classified<sup>4</sup> as ‘Category B<sup>5</sup>’ for environmental and social risks, on the premise that potential impacts of the construction of the coastal protection works would not be irreversible, would not be significant beyond the immediate project area and could be sufficiently mitigated.

Contingent to this classification was that the project would not use local sources of rock, sand or gravel; collectively called ‘aggregates’.

This activity was considered one of the highest risk for potential environmental and social impacts for RMI PREP, for three reasons: the potential to create conflicts between land owners and government regarding who owns the resource, coastal erosion risks, and reef and coastal environment biodiversity risks.

The extent and severity of coastal erosion on Majuro Atoll is well documented (McKensie, et. al, 2006<sup>6</sup>, Xue, 2001<sup>7</sup>, amongst others). A history of dredging, beach mining and reef rock blasting is widely considered a significant cause of this erosion. It appears that materials are removed from the coast that would otherwise have been available to replenish the beach. Removing rock and sand changes the pattern and energy of waves, changing erosion and deposition patterns. Ebeye and Majuro atolls are both vulnerable given their low lying geography, high population and key infrastructure located along the coast, and because of the future predictions of sea level rise and increased intensity and frequency of storms and typhoons.

Other impacts from dredging and beach mining include:

- 1) the removal of habitats in the dredging / mining zone – coral reef, reef rock, sandy-bottom environments, seagrass environments; and
- 2) the damage and degradation of habitats near the dredging zone from changes in water clarity, nutrients, wave energy, sand movements (erosion and deposition patterns) and sedimentation. Coral reefs are extremely sensitive to changes in light, sediment and nutrients. They are slow growing organisms and take a very long time (decades) to recolonize after disturbances and fully recreate the diversity of the original habitat.

The rates of natural replenishment of sand and gravel would vary depending on several factors (size and type of sand or gravel nearby, depth, location, tidal and wave directions and energy,

<sup>3</sup> Based on information provided by Pene Ferguson (WB) email 20 September 2018.

<sup>4</sup> Para 77, RMI PREP II Project Appraisal Document, April 18 2017

<sup>5</sup> Of a scale from Category A to Category C, where A is potentially significant risks beyond the immediate area, irreversible impacts and other risks requiring extensive mitigation and where C is low or no environmental or social risks.

<sup>6</sup> McKensie, et. al. 2006. Economic Assessment of the True Costs of Aggregate Mining in Majuro Atoll Republic of Marshall Islands. SOPAC Technical Report 383.

<sup>7</sup> Xue, C. 2001. Coastal Erosion and Management of Majuro Atoll, Marshall Islands. *Journal of Coastal Research*, Vol 17 No. 4 (Autumn, 2001), pp. 909-918.

frequency of storm surges and typhoons). The evidence indicates that the replenishment rate is less than the erosion potential, and that there is an overall increase in coastal erosion in Majuro.

Reef rock blasting has created large holes in the reef rock along the coastal edges of Majuro and Ebeye. These holes potentially reduce the surface friction provided by the reef rock thereby generating higher waves, and increased wave energy, would reach the shore at the location of pits. One study has measured a reduction in wave height and amplitude at the shore at the location of a pit, compared to intact reef flat<sup>8</sup>, but the methodology was very limited and the authors (and peer reviewers) recommend further research<sup>9</sup>. There is anecdotal evidence that the holes provide 'biodiversity', since corals can recolonize the edges of the pits and create 'fish nurseries'<sup>10</sup>. Locals like to fish in the holes as they provide easy access to reef fish trapped in the pits at low tide. There is also anecdotal evidence that the rates of colonization are low and that there is low coverage of corals in the pits. The pits also collect sand and gravel that would otherwise be deposited on the beach, further increasing vulnerability to erosion. Based on available information there are no net biodiversity benefits from the pits, and the coastal erosion issues outweigh any small gain in coral recolonization or 'fish nurseries'.

Finally, reef rock mining breaks the layer of rock that contains the underground freshwater lens on atolls. Whilst there is no readily available documented evidence of this occurring in Majuro or Ebeye, it is likely to have had cumulative impacts on the fresh water lens (along with urbanization and pollution).

The development objective of the RMI PREP project is to '*strengthen resilience to climate change and natural hazards in RMI through improved early warning systems, climate resilient investments in shoreline protection, and financial protection of the Recipient*'.

Shoreline protection will be a significant investment of both IDA and GCF funds with long term anticipated benefits for the sustainability of atoll communities. However, using near-shore dredged materials, blasted reef rock and / or beach sands to construct the coastal protection works could contribute to a net increase in vulnerability. It could effectively mean protecting one coastline while increasing the erosion and inundation risks elsewhere.

World Bank safeguards policies require the assessment of all potential impacts from project activities, including cumulative impacts and impacts from ancillary works such as sources of aggregates and waste disposal. OP4.04 Natural Habitats prohibits the Bank from funding projects where the impacts on critical habitats are significant. During project preparation, the risks of potentially increasing coastal vulnerability were screened and led to a decision to avoid impacts by avoiding the use of locally-sourced aggregates.

Recognizing the ongoing demand for sand and gravel for construction projects, the RMI PREP project is supporting RMI by funding a study to identify potentially sustainable sources of sands and gravels from Majuro and Kwajalein lagoons. The social, environmental and resource ownership aspects of aggregate dredging / mining will be considered alongside the technical aspects and economics. The outcome of this study is unlikely to be ready in time for RMI PREP coastal protection works, but may influence the source of sand or gravel for future projects. The study may also conclude that there are no potential sources of sand or gravels that would meet compliance with World Bank safeguards policies. Following the SPC report the Bank would still require a full ESIA for any aggregates that may be sourced locally. This would need to assess and address specific biodiversity, social, economic and coastal protection issues. This will take time to

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<sup>8</sup> Ford, et. al. 2013. Reef Flat Wave Processes and Excavation Pits: Observations and Implications for Majuro Atoll, Marshall Islands. *Journal of Coastal Research*, Vol 23 No. 3, pp. 545-554.

<sup>9</sup> Therefore it is difficult to give much weight to this study.

<sup>10</sup> We have no evidence of this, and 'fish nurseries' are unlikely. However, the pits are likely to trap fish on each outgoing tide.

investigate with no guarantee of clearance from the Bank if the risks are too high or mitigation is too costly.

EPA Permit conditions require abatement of sediment, and EPA do regular monitoring. Compliance with sediment abatement conditions is variable.

### 5.1.3. Potential Material Sourcing Issues for Ebeye Sea Wall

Some parties might promote locally sourced material based around considerations that given the project has a finite budget, and locally source material will be cheaper than imported material, it would be possible to extend the wall if locally sourced materials were used.

However, both WB and GCF safeguards protocols constrain the use of local rock for the seawall, with the indicated risk Category as B under both GCF and WB<sup>11</sup> predicated on use of imported materials. If rocks are locally sourced the project will default to Category A. We are advised that the GCF will not fund a Category A project, and the WB imposes more significant environmental and social requirements on a Category A project.

It is therefore necessary to import the seawall revetment rock, under-layer and any fill to retain the project's current risk status, with all aggregates imported according to the following process:

1. Where aggregates are sourced from a Part I Country<sup>12</sup>, no further assessment and documentation is required;
2. Where aggregates are sourced from a Part 2 Country<sup>13</sup>, the proponent is required to provide relevant documentation and other evidences to show aggregates are sourced from a licensed quarry(ies) and that proper regulations of the source country are fully complied with.
3. EPA will conduct due diligence to validate the documentation and information submitted by the proponent."

Some local material such as demolition materials or construction rubble, which is not derived from extraction, might be used, subject to ESIA on all such locally sourced material to confirm that adverse impacts are no more than minor, and that the material is not sourced from on-shore quarrying, near-shore or off-shore dredging, blasted reef rock and/or beach sands/natural rock.

### 5.1.4. Construction impacts

Table 1 sets out a summary of impacts of construction and earthworks (including maintenance works) with associated mitigation options.

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<sup>11</sup> GCF Categories:

(a) Category A. Activities with potential significant adverse environmental and/or social risks and impacts that, individually or cumulatively, are diverse, irreversible, or unprecedented;

(b) Category B. Activities with potential limited adverse environmental and/or social risks and impacts that individually or cumulatively, are few, generally site-specific, largely reversible, and readily addressed through mitigation measures; and

(c) Category C. Activities with minimal or no adverse environmental and/or social risks and/or impacts.

Source:

[https://www.greenclimate.fund/documents/20182/953917/GCF\\_B.19\\_06\\_-\\_Environmental\\_and\\_social\\_management\\_system\\_environmental\\_and\\_social\\_policy.pdf/126d7a6c-c20a-4d4f-9ef4-ad0719ef32a8](https://www.greenclimate.fund/documents/20182/953917/GCF_B.19_06_-_Environmental_and_social_management_system_environmental_and_social_policy.pdf/126d7a6c-c20a-4d4f-9ef4-ad0719ef32a8)

<sup>12</sup> Part 1 Countries are Developed Countries as per WB listing.

<sup>13</sup> Part 2 Countries are Developing Countries as per WB listing.

**Table 1: Impacts of Construction and Earthworks (including Maintenance Works)**

Potential Issue or Impact	Mitigation Measures
<b>1. Public safety -Vehicle Movements</b>	
Accidental injury to the public, particularly children, from vehicle movements is identified as potentially the most significant project risk element, given the high population density and limited maneuvering space on Ebeye.	Comprehensive Traffic Management Plan including attention to community safety
<b>2. Public safety – Project Works</b>	
Accidental injury to the public, particularly children, from project works generally is another significant project risk element.	Comprehensive Site Safety Management Plan including attention to community safety – to be developed by the Constructor.
<b>3. Procuring labor, goods and services</b>	
Concerns about imbalance between local impacts and local benefits in the short term.	Engage locals in work where possible, and prioritize local spending for food and services where possible. Ensure equitable access for men and women
Concerns about potential social impacts arising from any imported workers:	Engage locals in work where possible. Provide worker awareness training, and workshops with the community to support / encourage assimilation of workers into the communities during construction. Include HIV/Aids and STD issues in the training.
<b>4. Site Access</b>	
Potential disagreements/disputes with landowners/land users regarding site access.	Ensure all agreements are in place prior to starting works, including agreements to enter sites or buildings, and to install infrastructure and / or modify buildings or sites.
<b>5. Clearing Vegetation</b>	
Loss of vegetation (unlikely to be a major issue for Ebeye)	Selectively clear vegetation. Only remove what is absolutely necessary. Obtain agreement from the owner (including agreement on compensation if necessary) prior to trees being trimmed or removed. Whenever possible, land owners and occupiers should be allowed to benefit from cut vegetation for firewood and other uses.
<b>6. Sediment Control</b>	
Potential siltation and sediment runoff. Increased sedimentation into the lagoon or ocean and increased coastal erosion.	Minimize area of ground disturbance.

Potential Issue or Impact	Mitigation Measures
<b>7. Hazardous Substances/Fuel Storage and Maintenance Activities</b>	
Water pollution and human health risks associated with fuel spills	<p>Ensure that all equipment maintenance activities, including oil changes, are conducted within demarcated maintenance areas,</p> <p>Construct and maintain fuel storage areas,</p> <p>Constructor to include fuel, oil and hazardous waste in their CEMP for review by the Designer and approval by the EPA</p> <p>Never dispose spent oils on the ground or into the sea.</p> <p>All spills and waste petroleum products shall be treated as hazardous waste (see below).</p>
<b>8. Unexploded Ordinance</b>	Stop work on discovery of UXO – develop UXO response plan
<b>9. Impact on Marine Ecosystems</b>	
Potential further fragmentation of coral communities.	Avoid using locally sourced aggregates for seawall.
<b>10. Dust and Air Quality</b>	
Complaints by neighbours and community and worker health risks from creation of excessive dust during construction operations.	Prepare Dust Management Plan including attention to community and worker health risks and nuisance – to be developed as part of ESIA development.
	.
<b>11. Noise, Vibrations and Operating Hours</b>	
Complaints by neighbours and the public about noise and vibration.	<p>Where possible limit operations to between 6am and 6pm, Monday to Saturday, to reduce impacting on home life after work hours acknowledging that the Constructor may need to access the coast during low tide cycles overnight etc.</p> <p>Negotiate with schools, hospitals and other sensitive sites to develop a schedule of noisy work, taking into account the needs of occupants.</p> <p>Inform occupants and neighbors when there will be unusual or unavoidable noise.</p>
<b>12. Waste Management</b>	
Water and land pollution from uncontrolled use of materials and/or spills.	<p>Contractor to be responsible for the safe and sound storage and recycling or disposal of all solid waste; to be included in the Constructor's CEMP.</p> <p>Minimize the production of waste:</p> <ul style="list-style-type: none"> <li>• Avoid over-ordering of imported materials (don't overspecify);</li> <li>• Prefabricate parts (such as frames) where relevant and practical;</li> <li>• Train staff to reduce mistakes and wastage of materials;</li> <li>• Find local uses for left over materials;</li> </ul>



Potential Issue or Impact	Mitigation Measures
	<ul style="list-style-type: none"> <li>• Select materials that are easily reused or recycled at the end of their life. All workers to use mobile toilets provided for the project.</li> <li>• Store waste safely and securely on site. Separate hazardous waste, green waste, recycling, etc. Identify and demarcate storage areas clearly indicating the specific materials that can be stored in each.</li> <li>• All solid waste that cannot be reused locally is to be transported for recycling or disposal in approved landfills / waste disposal facilities.</li> <li>• Land owners and occupiers should have access to any tree trimmings and other materials that may be of use for firewood or other purposes.</li> <li>• No waste is to be left on site after the work is completed.</li> </ul>
<b>13. Occupational Safety</b>	
Risk of injury to workers	<p>The Contractor shall be responsible for complying with all RMI safety laws and regulations and the World Bank Group Environment, Health and Safety Guidelines, and should consider the following as a minimum:</p> <ul style="list-style-type: none"> <li>• Carefully and clearly mark pedestrian-safe access routes around the construction areas;</li> <li>• Conduct safety training for construction workers working at heights and around electricity, and driver safety training for heavy vehicle drivers, prior to beginning work;</li> <li>• Provide personal protective equipment and clothing (gloves, boots, etc.) for construction workers and enforce their use;</li> <li>• Post Material Safety Data Sheets for each chemical present on the worksite and ensure workers understand them.</li> <li>• Ensure that the removal of asbestos-containing materials or other toxic substances be performed and disposed of by specially trained workers with correct protective equipment;</li> </ul> <p>General Health and Safety Awareness for construction and maintenance workers will include:</p> <ul style="list-style-type: none"> <li>• Introduction to health and safety issues in construction sites by the Contractor;</li> <li>• Education on basic hygienic practices to minimize spread of tropical and sexually transmitted diseases, including information on methods of transmission and protection;</li> <li>• Prohibition of drugs, kava and alcohol on construction sites;</li> <li>• Assure availability of medical assistance in emergency or non-emergency situations and availability of other health-related assistance.</li> </ul> <p>Further guidance is provided in the World Bank Group EHS Guidelines (in reference list</p>

Potential Issue or Impact	Mitigation Measures
	below).
<b>14. Demolition or Alternation of Existing Buildings</b>	
Adverse impacts on the public, adjacent residents and landowners from ancillary building works – adjacent buildings etc.	<p>The Contractor shall implement adequate measures during demolition of existing infrastructure to protect workers and public from falling debris and flying objects. Among these measures, the Contractor shall:</p> <ul style="list-style-type: none"> <li>• Ensure all compensation and / or resettlement has occurred and access is authorized, prior to demolition.</li> <li>• Set aside a designated and restricted waste drop or discharge zones.</li> <li>• Conduct sawing, cutting, grinding, sanding, chipping or chiselling with proper guards and anchoring as applicable.</li> <li>• Maintain clear traffic ways to avoid traffic hazards from loose scrap.</li> <li>• Provide all workers with safety glasses with side shields, hard hats, and safety shoes.</li> </ul>
<b>15. Community Relations</b>	
Community concerns about the Project interfering with day-to-day life; greivances	<p>Inform the community about construction and work schedules, and the potential risks and harm from construction sites or maintenance work.</p> <p>Inform local community as early as possible and repeat at least one day in advance of any interruption to traffic, electricity or water supply etc. Advise through postings at the project site, at public meeting places, and in affected homes/businesses.</p> <p>Advise people of the complaints mechanism under the EMSF/ESMP that can be used to provide feedback and lodge complaints.</p>
<b>16. Environmental Emergency Procedures</b>	
Risk to the environment and local community from occurrence of unforeseen events such as spillages of fuel etc..	<p>In the event that accidental leakage or spillage of diesel/chemicals takes place, the following response procedures shall be followed:</p> <ul style="list-style-type: none"> <li>• The person who has identified the leakage/spillage shall immediately check if anyone is injured and shall then inform the Supervising Engineer or in his/her absence, the Site Operations Manager.</li> <li>• In such cases, all personnel shall take immediate action to stop and contain the spillage / leakage;</li> <li>• The Contractor shall arrange maintenance staff with appropriate protective clothing to clean up the chemicals/chemical waste. This may be achieved through soaking with sawdust (if the quantity of spillage/leakage is small), or sand bags (if the quantity is large); and/or using a shovel to remove the sand / topsoil (if the spillage/leakage occurs on bare ground);</li> </ul>

Potential Issue or Impact	Mitigation Measures
	<ul style="list-style-type: none"> <li>• Contaminated sand and materials must be handled as hazardous waste (see above).</li> <li>• The Contractor shall prepare a report on the incident detailing the accident, clean-up actions taken, any pollution problems and suggested measures to prevent similar accidents from happening again in future. The incident report shall then be submitted to MPW for review and submit to the appropriate RMI authority.</li> </ul>
<b>17. Monitoring</b>	
Need to confirm activities are being undertaken in accordance with plans or undertakings to ensure adverse impacts don't arise.	Visual site inspections on a weekly basis to be carried out by the Design and Supervision firm. Remedies to be discussed and implemented during the site inspections, and records kept.

### 5.1.5. Aquatic marine issues

There is only limited availability of quantitative data relating to Ebeye's lagoon and reef species and ecosystem. Ebeye's marine environment is reportedly degraded and polluted from years of raw sewage disposal, and other hazardous substances and contaminants including PCB.

Increased sedimentation during construction of the seawall may increase marine habitat degradation by contributing to coral smothering.

There is also the risk of a cumulative impact of seawall-related construction contamination (e.g. silt and dust) plus existing contamination from land-based pollutants. This could have implications for the inshore fishery if sedimentation proves to be a serious impact.

These issues will be explored in depth in ESIA's with measures for their mitigation set out in corresponding ESMPs.

## 5.2. Potential Adverse Social impacts

### 5.2.1. Land limitations in Ebeye

Ebeye's limited land area effectively eliminates the option of shoreline retreat and relocation as a strategy for climate resilience for threatened coastal populations.

During the construction phase, the demand for available land for the temporary use of the Project contractors, and for the possible relocation of affected people either temporarily or permanently, is an issue to be addressed in the Resettlement Policy Framework (Annex 2 of ESMF).

#### Questions for consideration during stakeholder engagement include:

1. What are people's understanding of risk of sea level rise?
2. What are peoples' views on relocation of households in relation to Wall construction?
3. What are peoples views on provision of additional public space, particularly if that means a tradeoff with wall size or length? [Note: Avoid talk of walkways or anything specific so as to not raise nay expectations].
4. As a resident adjacent the seawall how happy are you for the public/construction workers to walk behind your dwelling place – between your property and the sea?
5. For all parties, particularly residents adjacent the seawall: How important is it that you have direct access to the ocean side reef?

### 5.2.2. Land Ownership

In the Marshall Islands, the traditional landowners or Iroij, are held in extremely high esteem by not only their constituencies, but also the Government. It's an acquired status but one deeply rooted in history, and entrenched in Marshallese culture by the hereditary nature by which the Iroij title is passed down through generations of blood heirs. The Irojjs are Marshall Islands' royalty. In modern day Marshall Islands, this status is preserved if not further enhanced by the substantial powers vested in them by the Constitution as members of the Council of Irojjs. The Council is advisory and consultative in its role but the high public regard with which Irojjs are held means they yield enormous influence in the law-making process, on matters of national importance, and especially on issues of customs, traditional practices, lands and related matters. It follows therefore that where lands owned by Irojjs are of interest to the Government for public purposes, the process of acquisition is a negotiation between equal parties – Government and Irojjs – if not one slanted in the Irojjs' favor

. Both parties are endowed with resources to engage competent legal counsels to ensure their best interests are preserved as was the case with the renewed document. This power relationship eliminates any concerns about landowners being disadvantaged in such negotiations.

The principal Marshall Islands laws governing land acquisition, resettlement and compensation presently include (i) RMI Constitution and (ii) the Public Lands and Resources Act 2008. The Kwajalein Master Lease is also a major land ownership document for Ebeye.

### **RMI Constitution**

The RMI Constitution prohibits the “*alienation or disposition of [any land interest], whether by way of sale, mortgage, lease, license or otherwise, without the approval of the Iroijlaplap, Iroijedrik where necessary, Alap and the Senior Dri Jerbal of such land.*” These four classes represent “all persons having an interest in that land,” so approval is required from each before any land interest is alienated.”

### **Public Lands and Resources Act 2008**

The Public Lands and Resources Act 2008 sets out that all marine areas below the ordinary high water mark belong to the Government with various exceptions relating to fish weirs and traps, ownership of coconuts or other small objects deposited on the shore, and fishing rights on reefs where water is not greater than 4 feet at low tide.

The Act also addresses title to reclaimed land as follows:

§105. Title to land-filled and land reclaimed from marine areas.

*Notwithstanding the provisions of any law to the contrary, title to new land created through “land-fill” or other land reclamation processes, from marine areas below the ordinary high water mark, by the government, or by any other person, corporation or other legal entity, for any purpose whatsoever, shall vest in the owners of the adjoining land or lands.*

In summary, alienation of land requires approval of all parties, however constructing the seawall below the Ordinary High Tide mark (Mean High Tide Level) would not involve alienation of land and thus will not require these approvals.

However, ownership of the seawall will vest in the owner(s) of the adjoining land.

### **Kwajalein Master Lease**

The *Kwajalein Master Lease by and between Landowners and the Kwajalein Development Authority* (effective Date October 1, 2016) is legally binding and has significance and relevance to the issue of access and use of Ebeye land for project activities. The Master Lease is especially important in the unique context of landownership and development planning where traditional landowners’ involvement is integral.

The Master Lease is in effect the legal instrument used for the voluntary acquisition of Ebeye lands for public purposes the taking of which is allowed under the Land Acquisition Act 1968. It satisfies the requirement of the Constitution that “No land right or other private property may be taken unless a law authorizes such taking; and any such taking must be by the Government of the Republic of the Marshall Islands, for public use, and in accord with all safeguards provided by law”.

The Master Lease preserves the supremacy of the landowners, by among other conditions, requiring as a pre- condition the prior consent of landowners for any development including the creation of new easements. This fact is well understood and accepted by locals and government officials who unanimously note that nothing happens in Ebeye without the Iroijs prior approval.

The Master Lease is a negotiated agreement between the Mojen eo an Iroij Bwioe Jeimata Kabua on one hand, and KADA on the other, as the lessee and occupant, representing the Government.

The Master Lease vests in KADA access and use rights for designated Ebeye lands, with conditions and parameters for its use “... *in furtherance of its efforts to promote the redevelopment of Kwajalein Atoll ...and allow essential public infrastructure projects to go forward to the better welfare and health of its people...*”.

The Master Lease was signed in 1966, and its 50-year term expired in October 2016. An extension for a further fifty years has been negotiated and has been signed by all landowners and or their representatives except one – a foreign domiciled landowner whose signature is expected. The Master Lease covers existing land and ...any other new reclaimed land to KADA.

Under the Master Lease, KADA pays an annual ‘ground lease rent’ of US\$300,000 exclusive of taxes and administration fees. Of particular interest, in the Master Lease (Part V (A): Roads and Utility Corridors), the Lessor dedicates in perpetuity, all existing and presently designated future easements for public use, “...*at no additional consideration.*”

The Master Lease thus provides for the voluntary acquisition of Ebeye land for development purposes. Parts of this land are easements previously dedicated in perpetuity for public utilities such as water, sewer, electrical and drainage lines. KADA can authorize developments within the existing easements and can also define and set aside new easements as necessary, following a process set out in the Master Lease, which requires the prior consent of the landowners.

Under the Master Lease KADA has leasehold over landward elements of Ebeye, all “existing landfill” and all future or proposed landfill.

The Master Lease provides for KADA to have leasehold over the Seawall, whilst ownership under the Public Lands and Resources Act 2008 falls to the landowner.

Section VII of the Master Lease is relevant to the issue of compensation for lost or affected assets basically Section VII provides for:

*The Lessor “agrees to use and exercise all of their rights and powers as landowners under traditional Marshallese Customary Law and Traditional Practice to assist Lessee in its efforts to relocate these Occupants as necessary from their existing residences or business premises in order to permit the Lessee to complete its redevelopment of the Premises pursuant to Article V above in a timely manner”*

*The Lessor “shall be solely responsible for paying any amounts claimed by such Occupants as a result of the termination of any occupancy agreements that such Occupants may have entered into with Lessor prior to the date of execution of this Lease; provided, however, that in those cases where the relocation involves the taking of a privately owned residence or business premises, then Lessee shall pay the owner of such residence or business premises just compensation for the value of such residence or business premises”*

*The amount of the compensation to be paid by Lessee to such owner for such residence or business premises shall be determined by mutual agreement between the Lessee and such owner or, failing that, through condemnation proceedings. Lessee agrees that it will not attempt to relocate any Occupants until such time as it has located a comparable replacement residence and/or a replacement business premise, as appropriate, for such Occupant.*

### **Mon Nin Weto**

Application of the Master Lease is the appropriate mechanism for addressing land ownership and relocation issues (if any) relating to the seawall on Ebeye. However, the Mon Nin Weto is not a signatory to the Master Lease and must be dealt with separately in respect of land use/ownership issues.

### 5.2.3. Land Access

Access to and use of land for project activities will be addressed in the Resettlement Policy Framework. (Annex 2 of ESMF).

### 5.2.4. Physical cultural resources (PCR)

Several public cemeteries and burial grounds along Ebeye's coastline may be impacted adversely by the project. Measures to avoid and reduce these impacts, and to mitigate where impacts are unavoidable will be taken into consideration in ESIA's and ESMPs. A PCR Management Plan will be prepared as part of the Environmental Assessment and will include the following –

- Measures for avoiding or mitigating adverse impacts
- Chance Find Procedures
- Capacity Building, and
- Monitoring and reporting requirements.

A Code of practice for cultural heritage, and PCR Chance Find Procedures are provided in Annex 7 and 8 of the ESMF to assist the preparation of these plans as required.

### 5.2.5. Pressure on existing civil infrastructure

Ebeye is experiencing a boom in infrastructure development. In addition to PREP II, three other development projects are at various stages of planning and or implementation<sup>14</sup>. Each project will likely be implemented by outside contractors accompanied by hired expatriate workers. More frequent or regular visits of donor representatives, consultants and Majuro-based government and aid agencies representatives can also be reasonably expected.

Combining the various planned projects, this additional population and the accompanying project activities will put significant stress on Ebeye's limited services, resources and physical infrastructure. Ebeye is already severely overcrowded and existing civil infrastructural capacity for water, electricity, sewage and solid waste is badly deteriorated and or struggling to sustain its current population (USAKA, 2010)<sup>15</sup>.

There are limited facilities to support the additional population.

The expected influx may provide opportunities for and incentives for entrepreneurial individuals especially in the services sector. At the same time, there are potential adverse impacts to be considered including those associated with workers camps/accommodation.

### 5.2.6. Labor

Employment opportunities directly generated during project implementation is an important benefit for Ebeye, but will not be fully realized if the locals are not given priority for hiring by Project contractors.

Community resentment can lead to social conflict if locals feel they are being overlooked for jobs they are capable of performing, and given not only to foreigners but worse still, to Marshallese from other atolls.

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<sup>14</sup> An ADB Waste and Sanitation Project commenced implementation in March 2016; Compact funded Ebeye Mid-Corridor Housing Project; a separate Schools Project are in the advanced planning stages. JICA is also known to be in the early planning stages of a renewable energy (solar) project.

<sup>15</sup> US Army Corps of Engineers. June 2010. *Ebeye Infrastructure Survey Report*. USAKA pp. 85

It will be important that appropriate social safeguards controls are developed to avoid personnel related impacts on the local communities.

### 5.2.7. Social vices

RMI's population age structure is heavily skewed (40%) to people 14 years and younger. In Ebeye seeing young people on the streets in late hours of the night is a regular occurrence, giving credence to reports of people sleeping in shifts and of young people being encouraged "... to stay 'out' at night so the elders can sleep".

Not only do these observations underscore the seriousness of the overcrowding issue, but more importantly, they point to the existence of conditions that will expose vulnerable young people to underage sex, HIV AIDS, drugs, smoking and other undesirable habits.

ESIA consultations need to highlight these issues and ensure that appropriate social safeguards controls are developed to avoid personnel related impacts on the local communities, and ensure proper awareness and education of young people.

### 5.2.8. Adverse impacts on household income sources

Coastal degradation accelerated by sedimentation caused by project activities might impact household incomes for families dependent on the making and selling of handicrafts using seashells. Community consultations in Ebeye found a number of women and households rely on handicraft using a range of mollusks shells to subsidize family incomes. These are collected on the reef flats on the ocean side.

### 5.2.9. Gender related impacts

Improved community resilience as a result of the Project will benefit all in Ebeye irrespective of gender.

However, direct benefits in terms of local employment are likely to favor men over women, mainly due to the physical nature of non-skilled work that may be available for local people.

Where the expected influx of expatriate construction workers is assumed to be male dominated, given the types of skills likely required (heavy machine operators, mechanics, etc.) then the risk of young local females getting exposed to prostitution, sexual harassment and possibly other social vices, is heightened.

The issue of lost incomes described above is largely women-related, as collectors of shellfish and makers of weaved handicrafts adorned with an assorted mix of shells.

### 5.2.10. Unexploded Ordnances (UXO)

The risk of unexploded ordinances (UXO) from World War II in the Marshall Islands remains with an unknown amount of explosive devices remaining uncleared from many atolls. Kwajalein and surrounding atolls were heavily fortified by the Japanese forces during the early years of World War II until the US forces captured the atoll in February 1944.

Locals recall stories of Japanese dumping munition, and armaments including warplanes in the Ebeye lagoon before surrendering.

A 2013 US funded 'hazard reduction' project targeting the northern atolls of Taroa and Mili also recommended a survey of UXO for Ebeye and other atolls as a requisite to hazard reduction. To date this survey has not been implemented.



### 5.2.11. Positive and beneficial impacts

Strengthened climate resilience and improved protection from coastal hazards are the long term benefits of PREP Phase 2.

Coastal communities including those in the outer islands of RMI, are the targeted beneficiaries from improved information flow and communication for emergency preparedness and response.

In Ebeye, infrastructure and homes in the identified 'hot spots' where the risk of flooding and inundation is highest, will be better protected.

Likewise, are all other infrastructure, public facilities and homes immediately fronting the planned structures, and in other flood prone areas, will be better protected. Landowners will benefit from increased values of land and their continued habitability.

During construction of coastal structures, the Project will generate economic benefit for the Ebeye community through increased employment opportunities.

The increased demand for local services will create investment and business opportunities.

The immediate beneficiaries are local service providers in accommodation, supermarkets, food vendors/retailers, transportation, entertainment and others.

### 5.3. Risk Assessment

Refer Appendix 3.

### 5.4. Land Lease Process

Refer Appendix 4

## 6. STAKEHOLDER ENGAGEMENT

### 6.1. Identities

The following table identifies institutional, Governmental, non-governmental, commercial and community stakeholders at the National, Provincial and urban levels<sup>16</sup>.

Ministry of Works, Infrastructure and Utilities (MWIU)
MWIU Project Management Unit (PMU)
Chief Secretary's Office
National Disaster Management Office
Joint National Action Plan on Climate Change Adaptation and DRM
Chief Secretary's Office - Ebeye
Minister in Assistance
Ministry of Finance
Division of International Development Assistance - Project Implementation Unit
Program Support Unit (within SPC)
Regional Coordination Unit (within PIFS)
Regional Technical Committee
Environment Protection Authority
World Bank
National Weather Service
National Steering Committee (inclusive of NDC and NCCC)

<sup>16</sup> Masterfile Location: \\PREP II\PREP Phase 2- PM\General Project Documents\Stakeholder Engagement Plan\PREP II Full Stakeholder Matrix 103018 1009.xlsx

Kwajalein Atoll Development Authority
Kwajalein Atoll Local Government
Kwajalein Joint Utilities Authority
Mon Nin Weto Representatives
Women United Together Marshall Islands
International Organization of Migration
Red Cross
<b>Public Beneficiaries</b>
Direct Project Beneficiaries Ebeye
Direct Project Beneficiaries Majuro
Direct Project Beneficiaries Outer Islands
Negatively Affected Parties Ebeye
Negatively Affected Parties Majuro
Negatively Affected Parties Outer Islands

The Stakeholder Engagement Masterfile<sup>17</sup> identifies for each party, the respective stakeholder roles and responsibilities for engagement.

## 6.2. Lead for Negotiations

Senior lead person for high level negotiations – to be decided by SC – could be Chief Secretary or similar.

Negotiator will vary depending on matter under negotiation and “level” of subject matter.

## 6.3. Encouraging Stakeholders to Engage

### 6.3.1. Stakeholder Engagement Philosophy

Stakeholder engagement will be undertaken on the basis that Stakeholders are to be encouraged to engage, especially in the early pre-design stages and that Stakeholder input will provide an important basis for final design.

This SEP has been developed in accordance with the “PREP II Stakeholder Engagement Philosophy” and the Stakeholder Engagement Diagram provided as Figure 1:

#### “PREP II Stakeholder Engagement Philosophy”

*As a guiding principle, all stakeholders with an interest in PREP II will be afforded opportunities to:*

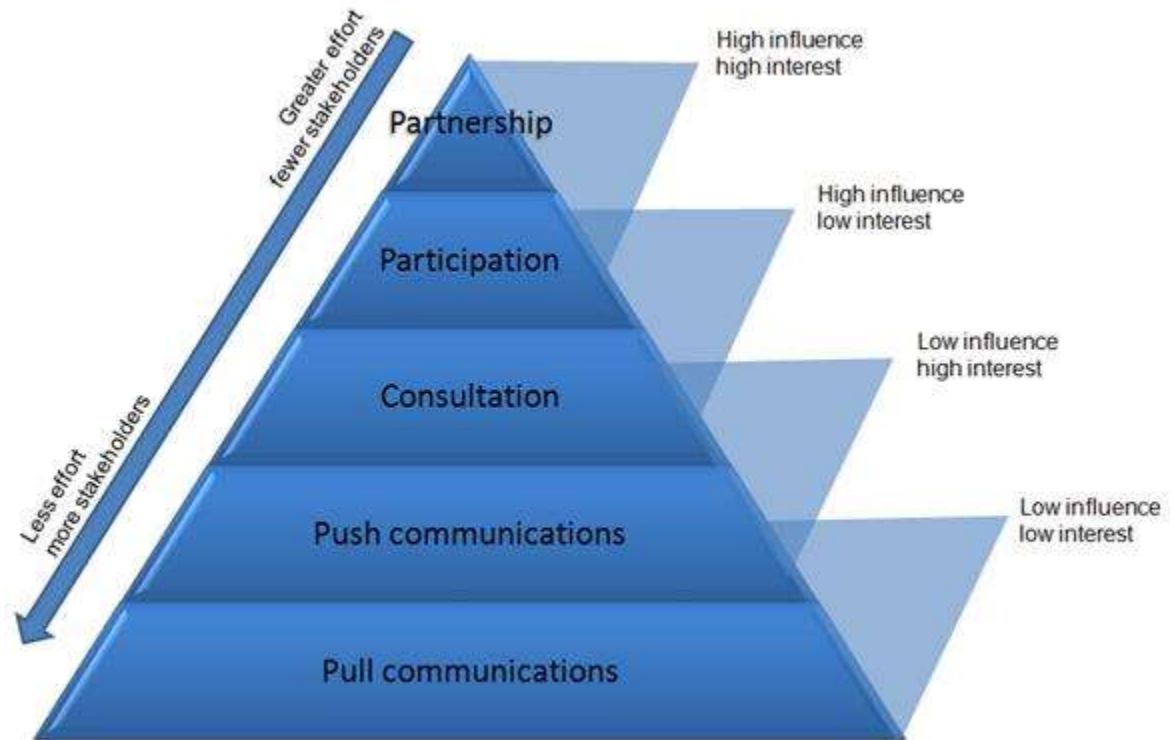
- *Understand the Project and its implications for them.*
- *Participate in the design, implementation and review of sub-projects directly affecting them, and*
- *Have access to mechanisms to voice opposition or grievance arising from project activities*

In broad terms PREP II’s stakeholder engagement is based on meaningful engagement and encouraging participation, not just communication. PREP II will:

- Enable people / communities to openly express their preferences or concerns without intimidation or trepidation;
- Consult with people on ‘their terms’ (language, time, location, methods, etc.)

<sup>17</sup> Masterfile Location: \\PREP II\PREP Phase 2- PM\General Project Documents\Stakeholder Engagement Plan\PREP II Full Stakeholder Matrix 103018 1009.xlsx

- Engage women and vulnerable community members who may not be able to engage through the usual methods of communications with villager and land owners.
- Allow enough time for stakeholders to prepare and participate, and their contributions can be integrated into project design and other outputs.
- Keep accurate records of attendance and information shared. (Date, location, list of participant (including gender, role/title), summary of issues discussed and outcomes agreed).
- Integrate stakeholder contributions into plans and designs where practicable.
- Provide an adequate budget for staff/ consultants, venue hire and catering, materials etc.
- Develop a transparent and open programme for Project implementation.



**Figure 1:** Stakeholder Engagement Diagram

#### 6.4. Information Disclosure

Information for the PREP II Ebeye Project will be disclosed to each of the stakeholder groups as set out in Table 2.

**Table 2:** Information Disclosure Methods for PREP II

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Percentage reached	Responsibilities
Pre-Design	Project scope, seawall design options, trade-offs	<ol style="list-style-type: none"> <li>1. Prepare material for circulation.</li> <li>2. Develop questionnaire to identify values important to stakeholders.</li> <li>3. Consider public meeting; canvassing – survey; short videos; radio announcement (102.5FM)</li> </ol>	<p>Start once questionnaire finalized.</p> <p>Poster on community bulletin board</p> <p>Canvassing – survey weekly</p> <p>Radio twice daily in weeks of disclosure</p> <p>Videos used in meetings with stakeholders before published on Youtube</p> <p>Consider meetings before and during transitional phases, and peak activity, quarter's end, and year's end</p>	<p>Community bulletin boards: Overall Ebeye community</p> <p>Canvassing: oceanside residents; vulnerable groups; overall Ebeye Community</p> <p>Radio: Overall Ebeye community</p> <p>Videos: Ebeye Community; RMI; International</p> <p>Consider public meetings: overall Ebeye community</p> <p>Private meetings: traditional leaders; vulnerable groups; KEA;</p>	100% with combination of radio, short videos, canvassing, public meeting, announcements and flyers	Ebeye Project Representative
Construction	Impacts of Construction and Earth Works; Traffic management plan; Site Safety Management Plan; Worker Awareness; Dust Management Plan; Noise Pollution; Waste Management; Grievance Redress Mechanism	Kwajalein Atoll 102.5FM Radio announcement; PREP II Short Videos; public meetings; private meetings; quarterly; posters; flyers; KADA FB page;	<p>Poster on community bulletin board</p> <p>Radio twice daily in weeks of disclosure</p> <p>Videos presented in stakeholder meetings before published on YouTube</p> <p>Meetings before and during</p>	<p>Overall Ebeye Community</p> <p>Traditional leaders</p> <p>Ebeye department heads</p> <p>Oceanside residents</p> <p>Kwajalein Educators Association</p> <p>Parents with children</p>	<p>Radio reaches 100%;</p> <p>Videos reach 60%</p> <p>Public meetings reach 0.5%</p> <p>Private meetings reach 3%</p> <p>Quarterly newsletter 5%</p> <p>Posters 20%</p> <p>Flyers 20%</p>	Ebeye Project Representative

			transitional phases, activity, quarter's end, year's reporting	peak and end, end	Women Persons with disability Elderly	KADA FB page 20%	

**6.5. Proposed Consultation Strategy**

Table 3 sets out methods to consult with each of the stakeholder groups. Methods used will vary according to target audience, for example:

- Interviews with stakeholders and relevant organization
- Surveys, polls, and questionnaires, including for PREP II a baseline assessment of satisfaction/perceptions
- Public meetings, workshops, and/or focus groups on specific topic
- Participatory methods
- Other traditional mechanisms for consultation and decision making.

**Table 3:** PREP II Consultation Methods

Project stage	Topic of consultation	Methods used	Timetable: Locations/ dates	Target stakeholders	Responsibilities
Pre-Design	Project Scope	Private Meeting  Private Meeting  Private Meeting  Public Meeting  Public radio announcement (102.5FM) – 6 monthly newsletter  Short Video: “Ebeye Seawall Project” – to include information on GRM		Ebeye Traditional Leaders (including Mon Nin Alap)  Ebeye Department Heads  Rukjenleen Club  Ebeye Community  Ebeye Community  Ebeye Community, Project Stakeholders, WB	Ebeye Project Representative
Pre-Design	Mon Nin Weto	Private meeting		Mon Nin Weto and KADA	Ebeye Project Representative
Construction	Traffic Safety; Social Safeguards; Noise Pollution; Potential Repercussions of Construction	Public meeting  Public meeting  Public radio announcement (102.5FM) Short Video: “Safety First: Ebeye Seawall Project”		Kwajalein Educators Association  Ebeye Community  Ebeye Community  Ebeye Community	Ebeye Project Representative

## 6.6. Proposed strategy to incorporate the views of vulnerable groups

The Project recognizes the value of the views of vulnerable or disadvantaged groups, and that the Project should be as inclusive of all parties, as possible. In order to minimize discouragement during deliberation processes, it is important to consider the needs of these disadvantaged groups, including women and persons with disability.

Meetings held separately for each group is imperative to foster a conducive environment for consultation. Interpreters will be sought for deaf persons, as well as other professional assistance, should the need arise. Moreover, accessible meeting venues and transport will be provided for persons with disabilities. One-on-one meetings, or at home visits for disadvantaged persons living in areas directly affected by the project, are also considerable options.

## 6.7. Stakeholder Engagement Template

Appendix 2 sets out a template for recording stakeholder engagement meetings.

The form would be filled in by the appropriate PREP II party involved in or responsible for that consultation event and will be filed by the PREP II Ebeye Representatives to provide a comprehensive record of meetings held through the course of the project.

## 6.8. Summary of project stakeholder needs

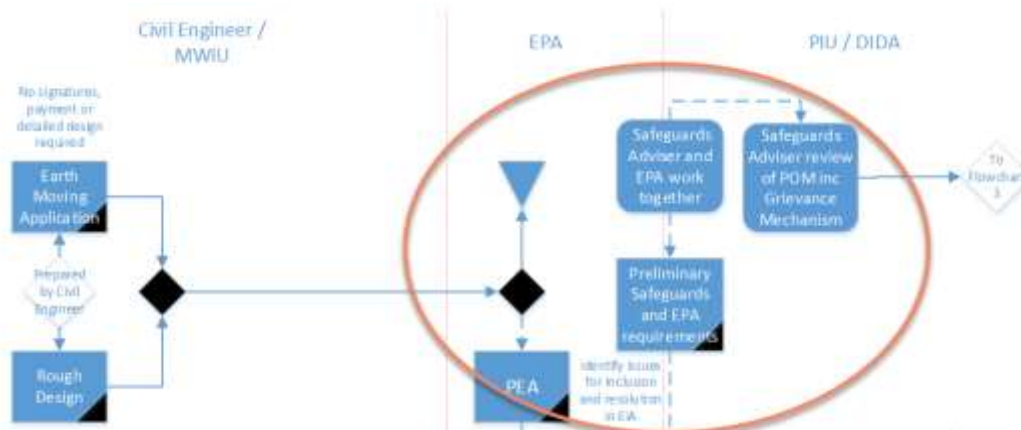
The following table sets out needs of each identified stakeholder groups involved with PREP II:

Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs
Ebeye	Ebeye Traditional Leadership	Representatives from all three realms.	Official language	Written information, radio, letter, visit	Accessibility
Ebeye	Chief Secretary's Office – Ebeye		Marshallese; English	Email, phone, written information	
Ebeye	Kwajalein Atoll Development Authority		English	Email, phone, written information	
Ebeye	Kwajalein Atoll Local Government	Have council representation from all over the atoll and the various groups on Ebeye	Marshallese	Email, phone, written information	
Ebeye	Kwajalein Atoll Joint Utility Resources, Inc.		Marshallese, English	Email, phone, written information	
Ebeye	Mon Nin Weto	Landowner of weto not included in Kwajalein Atoll Master Lease	Marshallese	Phone, written information, letter, visit, radio	
Ebeye	Rukjenleen Club	Representation of all women's group on Ebeye; under WUTMI umbrella	Marshallese	Email, phone, written information, radio, letter	
Ebeye	Church Groups	Representation from all 11 churches on Ebeye	Marshallese	Email, phone, written information, radio, letter	Meetings not held on church days

					(Sundays or Saturdays)
Ebeye	Kwajalein Educators Association	Association of key members of each 8 school and PTA	Marshallese, English	Email, phone, written information, radio, letter	Meetings not held during school hours
Ebeye	Ebeye Elderly Population – especially those living oceanside	Individuals 50+ years old. Men and women	Marshallese	Email, phone, written information, radio, letter	Provide transport for individuals, large writing, mic system, accessibility
Ebeye	Ebeye Persons with Disability	(TBD – info from MOCIA Gender and Disability Office)	Marshallese	Email, phone, written information, radio, letter	Provide transport for individuals, large writing, mic system, accessibility, interpreter

### 6.9. Timelines

This SEP relates to the Pre-Design phase of the Project. It is intended to assist PREP II personnel in their preliminary discussions with various stakeholders. These preliminary discussions occur in the highlighted area of Figure 2 which is taken from the Pre-Design Project Flowchart:



**Figure 2:** Pre-design engagement by PIU/DIDA

This SEP and the information collected assist the Design Consultant with stakeholder engagement as part of ESIA preparation.

### 6.10. Review of Feedback and Comments

All comments/feedback will be recorded in a comments/feedback register by the Ebeye Project Representative, who will then direct the comments to the Designated Contact Person and DIDA Safeguards Advisor for consideration as to how comments are to be addressed.

Recorded comments will be provided upon request to those involved in the PREP II Project.



## 6.11. Future Phases of Project

Stakeholders will be notified about the Project via quarterly reports during construction period, and annual reports during the implementation period, special reports during peak phases of activity, when the public might experience more impacts from the project, and when phases are changing.

It is important that stakeholders and the general public are made aware of the future phases of the project.

Information media such as the PREP II Short Videos, the Kwajalein Atoll Development Authority's Facebook page, quarterly newsletters, radio announcements, posters, and flyers, will be used to supplement traditional mediums, such as public and private meetings.

## 6.12. Resources and Responsibilities for implementing stakeholder engagement activities

The SEP is the overall responsibility of the DIDA Safeguards advisor.

The PREP II Ebeye Representative has day to day implementation and management responsibility

Provide contact information if people have comments or questions about the project or the consultation process; that is, phone number, address, e-mail address, title of responsible person (individual names may change).

PREP II Project Manager's role in the stakeholder engagement activities is to ensure oversight and timely response to stakeholders' GRMs. This is vital to the success of the Ebeye Project. The PREP II Ebeye Project Representative is the liaison between the Ebeye stakeholders and the PREP II management. During stakeholder engagement activities, minutes will be taken recording stakeholders present, matters discussed, comments made, and grievance reports collected.

It is the responsibility of the PREP II Ebeye Project Representative to process all grievances and ensure that management addresses these grievances in a timely manner. The Project Representative will create an extensive database recording all grievances made by stakeholders and stakeholder engagement activities.

## 6.13. Monitoring and Reporting

### 6.13.1. Involvement of stakeholders in monitoring activities

The RMIEPA will be undertaking some monitoring under the provision of the Earthmoving Permit. This monitoring will be done in consultation with PREP II personnel to ensure efficient use of resources.

### 6.13.2. Reporting back to stakeholder groups

Results of stakeholder engagement activities will be reported back to both affected stakeholders and broader stakeholder groups on a regular basis in the 6 monthly newsletter or on an individual basis relating to specific issue sor grievances.

## 7. SAFEGUARDS PROCESS OVERVIEW

- See Appendix 1

## 8. GRIEVANCE REDRESS MECHANISM

### 8.1. Introduction

#### 8.1.1. Principles of the Complaints Process

The Complaints process is for people seeking satisfactory resolution of their complaints on the environmental and social performance of the PREP II Project.

This Process is consistent with the Project's Environmental and Social Management Framework (ESMF) Grievance Redress Mechanism. The mechanism will ensure the following:

- the basic rights and interests of every person affected by poor environmental performance or social management of the project are protected; and
- their concerns arising from the poor performance of the project during the phases of design, construction and operation activities are effectively and timely addressed.

#### 8.1.2. Overview

This GRM covers the entire Component, not just the construction phase. It is recognized that complaints can come at any time, including pre-design, design and post installation.

Figure 3 sets out an overview of the PREP II Grievance Redress Mechanism (GRM) for all aspects of the Ebeye-Sea Wall Project, showing involvement of the relevant parties. The PREP II Ebeye Representative (KK) is involved at each stage in a coordination and liaison role to help facilitate resolution where possible.

For the purposes of this GRM, the Designated Contact Person (“**DCP**”) is the PREP II Ebeye Representative.

Table 4 explains the relevant roles and responsibilities associated with the Grievance Redress Process from the perspective of the Ebeye Project.

**Table 4: Grievance Redress Process**

Stage	Process	Duration
1	<p>Aggrieved Party (AP) takes their grievance to either Construction Site Supervisor (CSS) or Designated Contact Person – obviously in the pre-construction period there will be no CSS and the DCP is the appropriate person. Once construction commences, the CSS becomes the initial focal point for information.</p> <p>If the AP contacts any of the Project Representatives set out in Section 8.2, those Project Representatives will communicate the grievance to the DCP or CSS.</p> <p><b>Pre- and post-construction</b> – DCP endeavours to resolve it immediately. Where AP is not satisfied, the DCP will refer the AP to the MWIU PMU Project Manager.</p> <p>For complaints that were satisfactorily resolved by the DCP, the incident and resultant resolution will be logged and reported to the PREP II Project Manager.</p> <p><b>Post-construction commencing</b> – CSS endeavours to resolve issue immediately. Where AP is not satisfied, the CSS will refer the AP to</p>	Any time.

	<p>the DCP.</p> <p>For complaints that were satisfactorily resolved by the CSS, the incident and resultant resolution will be logged and reported to the PREP II Project Manager.:</p> <p>Complaints records (letter, email, record of conversation) are stored together, electronically or in hard copy.</p> <p>Each record is allocated a unique number reflecting year and sequence of received complaint (i.e. 2018-01, 2018-02 etc.).</p>	
2	<p>On receipt of the complaint, the Project DCP endeavours to resolve it immediately.</p> <p>For complaints that were satisfactorily resolved by the DCP, the incident and resultant resolution will be logged by the DCP and reported to the PREP II Project Manager.</p> <p>If unsuccessful, DCP then notifies MPW PMU Project Manager.</p>	Immediately after logging of grievance.
3	<p>The MWIU PMU Project Manager endeavours to address and resolve the complaint and inform the aggrieved party. If it's a land issue, MPW Project Manager will advise the MPW Secretary and the latter will consult KADA on the matter, for a solution.</p> <p>For complaints that were satisfactorily resolved by the MWIU PMU Project Manager, the incident and resultant resolution will be logged by the MWIU PMU Project Manager and reported to the Ebeye PREP II Representative and PREP II Project Manager.</p> <p>The MWIU PMU PM will refer to the MWIU Secretary other unresolved grievances for his/her action</p>	2 weeks.
If the matter remains unresolved, or complainant is not satisfied with the outcome:		
4	<p>The MWIU Secretary, will then refer to matter to the National Steering Committee for a resolution.</p> <p>The PREP II Project Manager will log details of issue and resultant resolution status.</p>	1 month.
5	If it remains unresolved or the complainant is dissatisfied with the outcome proposed by the NSC, he/she is free to refer the matter to the appropriate legal or judicial authority. A decision of the Court will be final.	Anytime.
6	For Component 2, if it's a land related issue, KADA may seek the assistance of the Traditional Land owners, and their decision will be final.	Immediately after Stage 3.

Grievance Redress Mechanism for PREP II Ebeye Project  
 KK [PREP II Ebeye Representative] Interactions Noted

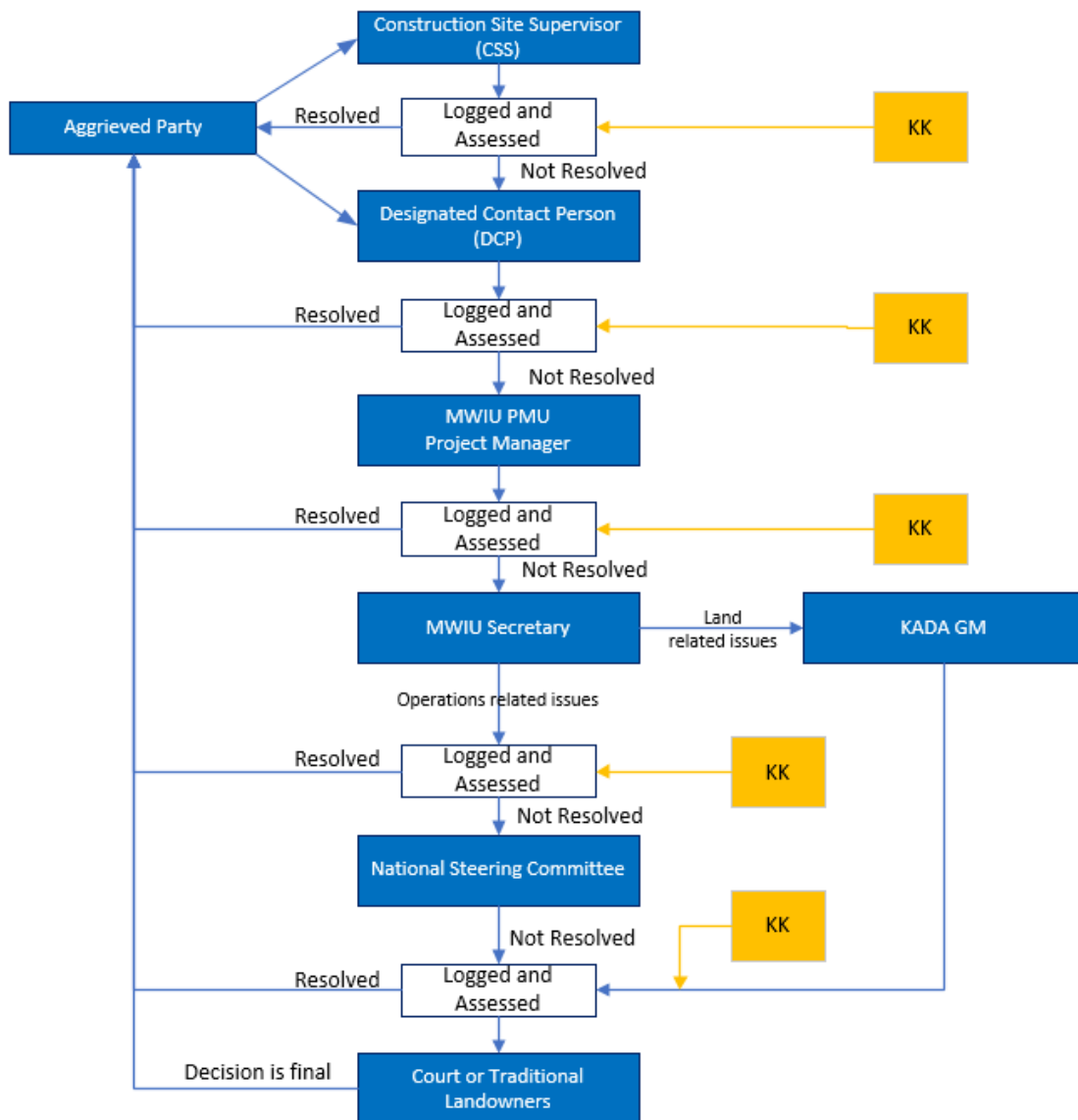


Figure 3: PREP II Ebeye *Grievance Redress Mechanism*

**8.2. How to Get in Touch**

Anyone can make a complaint, raise a grievance, ask for information on the project or get in touch for any reason. Complaints can be anonymous. The various ways to get in touch are:

**In person:**

Ebeye- [To come – PREP II Ebeye Office plus Contactor office contact point]

Majuro - MIDB Building, Level 4, Room #405 Delap Village, Majuro MH 96960

**By Phone:**

Construction Site Supervisor	XXXXX [To Come]
PREP II Ebeye Representative, Ebeye, Kitlang Kabua	(692) 235 2691
DIDA Office, Majuro	(692) 625 5968
PREP II Project Manager, Majuro, Tony Mellen,	(692) 456 4224
PREP II Project Engineer, Grant Bilyard	(692) 455 1842
DIDA Safeguards Advisor, Garry Venus	(692) 455 3648
MWIU PMU Project Manager, Melvin Dacillo	(692) 625-7407, 625-8911/8931

**By email:**

CSS	email address XXXX [to Come]
PREP II Ebeye Representative, Kitlang Kabua	Ebeye <a href="mailto:kabua.kitlang@gmail.com">kabua.kitlang@gmail.com</a>
PREP II Project Engineer	grant.bilyard1@gmail.com
PREP II Project Manager, Majuro	<a href="mailto:tony.mellen@gmail.com">tony.mellen@gmail.com</a>
PREP II Project Engineer, Grant Bilyard	grant.bilyard1@gmail.com
DIDA Safeguards Advisor	gazza700@gmail.com
MWIU PMU Project Manager, Melvin Dacillo	<a href="mailto:architectpmurmi2005@gmail.com">architectpmurmi2005@gmail.com</a>

where possible copy to XXX [World Bank Program Manager in RMI – position not yet appointed]

**By mail:**

Ebeye- [To come – PREP II Ebeye Office]

Majuro – DIDA, P.O. Box D Majuro, MH 96960

**Website:**

[rmi-mof.com/division-of-international-development-assistance/news-and-updates/](http://rmi-mof.com/division-of-international-development-assistance/news-and-updates/)

This information, and a brief summary of the process for answering queries and managing grievances, will be published on the DIDA website, and in consultation discussions particularly when involving the RMI and other Stakeholders.

**8.3. Complaint Form**

Complaints may be received in any form, from anyone, including anonymous. Anyone in the team may receive a complaint at any time, including Contractors. All complaints shall be immediately forwarded to the Ebeye Representative as DCP or to the CSE once construction has commenced. All such contacts will be recorded and screened.

The following template is for recording grievance complaints. Each incident should be recorded and the forms filed appropriately by the PREP II Ebeye Representative. Screening will determine whether the complaint is project related. If the complaint is not project-related then it is closed (or referred to the correct agency).

## GRIEVANCE REPORT FORM

<b>Grievance Information: Summarise Details</b>		
<b>Name of Complainant (or anonymous), and gender</b>	<b>Employee ID (if Employee)</b>	<b>Telephone</b>  <b>Email</b>
<b>Date of Complaint</b>	<b>Date of 2 week deadline for resolution or escalation:</b>	<b>Actual date of close out:</b>
<b>Date, time, and location of Event leading to Grievance:</b>		
<b>Detailed account of Grievance (Include names of persons involved) if known:</b>		
<b>Are there any policies, procedures, guidelines that may have been violated:</b>		

**Proposed solution or sought remedy:**

**Outcome of Grievance:**

**Date and Signature of Entry into Record:**

**Date and Signature of Close-out:**

#### **8.4. Communicating the GRM with Stakeholders**

During all Stakeholder Engagement Activities, there will be a statement announcing that there is a Grievance Redress Mechanism where Stakeholders can raise complaints and have them processed. Moreover, the Ebeye Project Representative, who is the focal point for the project on Ebeye, will provide her contact information during all activities, and provide a location where stakeholders can log their complaints.

There will also be a notice at the Majuro office, Ebeye office and a notice on the website at all times explaining the complaints procedure and providing the contact details.

**Appendix 1- RMI and WB Safeguards Framework**



**Appendix 2: Consultation Record Template**

## Template for Consultation and Stakeholder Engagement at the Activity/Subproject Level Records of Meetings

**Preamble:**

For any activity/subprojects that will be developed during the project implementation phase, consultation will be specific to the activity/subproject design, safeguards issues and the community(ies) where the project will be located.

This template sets out an activity/subproject specific consultation plan in respect of such consultations, and is to be used for each meeting/consultation event.

Project Name	RMI PREP II
Activity/Subproject for consultation	
Purpose of Consultation	
Date	
Venue/Location	
Name of Facilitator	
Who was invited and who attended: Name, gender, Organization or Occupation, Telephone/ e-mail /address (home and/or office)	
Meeting Agenda	Include or refer to document(s)
Summary Meeting Minutes (Comments by gender, Questions by gender and Response by Presenters by gender)	Include or refer to document(s)
List of decisions reached, and any actions agreed upon with schedules and deadlines and responsibilities	Include or refer to document(s)

How the project design, ESMP or other documentation was amended to take into account the issues raised during the consultation.	
How and when was meeting notified? [describe or provide copy of the announcement]	
Materials presented at consultations, e.g. information bulletins, maps, plans, photographs	Include or refer to document(s)
<b>ESMF Compliance Verification</b>	
Organisation	<input type="checkbox"/> Venue accessible <input type="checkbox"/> Timing convenient <input type="checkbox"/> Social and culturally appropriate <input type="checkbox"/> Notice of meeting sufficient for participants.
Engagement	Did meeting account for: <ul style="list-style-type: none"> <li><input type="checkbox"/> Needs of the participants</li> <li><input type="checkbox"/> Gender sensitivities</li> <li><input type="checkbox"/> Local language requirements</li> <li><input type="checkbox"/> Avoiding technical and bureaucratic jargon.</li> <li><input type="checkbox"/> Inclusiveness to all sectors of the public</li> <li><input type="checkbox"/> Representatives of vulnerable groups</li> <li><input type="checkbox"/> Maximising input from women.</li> <li><input type="checkbox"/> Facilitators engagement with participants at the conclusion to ensure all opinions are recorded for those not speaking up out of respect for custom and seniority</li> </ul>

