



Stakeholder Engagement Plan (SEP) - Tuvalu Safe and Resilient Aviation Project - P180674

Tuvalu Safe and Resilient Aviation Project TuSRAP-
P180674

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Acronyms

ADB	Asian Development Bank
AP	Affected People
CPMO	Central Project Management Office
DPO	Disabled Persons Organisation
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GoTv	Government of Tuvalu
GRM	Grievance Redress Mechanism
GSC	Project Steering Committee
IA	Implementing Agency
ICAO	International Civil Aviation Organisation
LMP	Labour Management Procedure
MHARD	Ministry of Home Affairs and Rural Development
MNR	Ministry of Natural Resources
MoF	Ministry of Finance
NGO	Non-governmental Organisation
PDO	Proposed Development Objectives
PESMP	Project Environmental and Social Management Plan
PM	Project Manager
PMU	Project Management Unit
PWD	Public Works Department
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
TANGO	Tuvalu Association of Non-governmental Organisations
TNCW	Tuvalu National Council of Women
TuSRAP	Tuvalu Safe and Resilient Aviation Project
TvAIP	Tuvalu Aviation Investment Project
WB	World Bank

1 INTRODUCTION

1.1 Background

The Government of Tuvalu (GoTv) has requested additional support from the World Bank (WB) to develop a safer and more resilient aviation sector and provide more reliable international connectivity to and from Tuvalu.

The proposed Project development objective (PDO) of the Tuvalu Safe and Resilient Aviation Project (TuSRAP) is to improve the safety and resilience of Tuvalu's aviation sector, building on the achievements of the Tuvalu Aviation Investment Project (TvAIP). This is to be achieved through the following components: Component 1: Safe and Resilient Airport Infrastructure Solution; Component 2: Strengthening Capacity of Aviation Sector; and Component 3: Project Implementation Support.

This document is the Stakeholder Engagement Plan (SEP) for the TuSRAP. This SEP describes the planned stakeholder engagements and consultation process to be implemented during the implementation of the project. The SEP is developed as required under WB Environmental and Social Standard (ESS) 10: Stakeholder Engagement and Information Disclosure.

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

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

1.2 Project Description

Component 1 will focus on improving the climate resilience and safety of Funafuti International Airport (FUN) infrastructure through resurfacing the existing runway. The following activities are proposed: rehabilitation and repairs of the runway, installation of navigation safety equipment, and other priority activities to enhance the safety and resilience of the airport infrastructure.

The Project will also implement activities that will improve the capabilities for aviation sector management, policy, resilience, safety and security oversight, including (i) safety and security oversight audits for airport certification; (ii) support to the implementation of the International Civil Aviation Organisation ICAO Corrective Action Plan; (iii) capacity building on airport asset maintenance strategies; (iv) training on aviation policy, asset management and operations; and; (v) other priority capacity strengthening activities to enhance safety and resilience of the aviation sector.

The entire Tuvaluan population of 11,000 are regarded as beneficiaries of this project since the improvements to the runway will make air travel safer and more reliable and benefit the entire society. Primary beneficiaries are air travelers from and to Tuvalu: residents, tourists, travelers visiting friends and relatives, public administration and business travelers, seafarers and seasonal agriculture workers, and recipients of education, training, and specialized health services. Since Funafuti Airport is the only airport for the entire country, maintaining its operations safe is critical and urgent not only for supporting

recovery from the pandemic but also to supply basic goods via air cargo, for emergency response, and for humanitarian aid after disasters.

2 PREVIOUS STAKEHOLDER ENGAGEMENT

Under TvAIP, extensive consultations have been held with the Funafuti communities, community leaders, community groups and other key stakeholders over the life of that project starting in 2014. Generally, high levels of support for the project have been readily demonstrated given the critical role that international connectivity plays in the lives of Tuvaluans.

Under TvAIP consultations were undertaken with project affected groups (stakeholders) and non-government organizations (NGO). The potential environmental and social impacts of the project required the opportunity for discussion and review during the TvAIP ESMP updating process to inform detailed design and mitigation measures. There have been four public consultations to date:

- September 2011, Initial PESMP for TvAIP
- October 2013, focus on road rehabilitation
- July 2017, additional funding for runway repairs
- 10 July 2019, potential asphalt plant and stockpile sites

3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

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

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

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

3.1 Identification of stakeholders

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

For the TuSRAP, stakeholder groups include Funafuti communities and national government authorities. Stakeholders for the Project have been and will continue to be identified on a continuing basis by:

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

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

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

- Project Affected parties
- Other interested parties
- Disadvantaged/ Vulnerable Individuals or Groups

This section details stakeholders who may be relevant to consider for specific components of the Project. It is noted that the majority of the project components are technical in nature relating to specific aspects of aviation operations and/or are civil works whose design and execution area closely defined by the technical features of their performance requirements. As such, the majority of the Project components will not be the subject of community and/or stakeholder engagement. While in no way limited to the this, specific Project components for which community and stakeholder engagement is specifically relevant include:

- Stakeholders impacted by the location, design and operation of the asphalt plant, stockpile and laydown sites,
- Stakeholders affected by the construction phase of the runway remediation works, e.g., informal recreational users of the runway,
- Stakeholders, specifically the Tuvalu National Council of Women (TNCW), who will receive support with their activities under Component 3 of the project.
- Any other Project-relevant issues and interests raised in the course of consultation.

3.1.1 Government Authorities and Institutions

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

Ministry of Transport, Energy and Tourism (MTET)

In addition to being the GoTVs Implementing Agency (IA) for this Project, the MTET is responsible for the provision of strategic policy direction in the aviation sector and ensuring policy implementation through its effective translation into operational strategies and results-based management. The Ministry is also responsible for the formulation and implementation of tourism policies which rely on a safe and resilient aviation sector. MTET will be the lead ministry and implementing agency for project communications under the TuSRAP Project.

Ministry of Finance (MoF)

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

National natural and land resources agencies

There are three agencies which have responsibility for managing land and natural resources. These are: Ministry of Local Government and Agriculture, Ministry of Fisheries and Trade, Office of the Prime Minister. These three agencies are responsible for maximizing social and economic returns through the sustainable management and harvesting of all agricultural resources in Tuvalu; also, to maximize social and economic returns through the sustainable management and harvesting of marine resources; and to facilitate maximum land usage in Tuvalu by maintaining a systematic register of all available land resources. Any land issues under the TuSRAP Project will be managed through the Department of Lands and Survey which sits under the Office of the Prime Minister (OPM).

Funafuti Kaupule

The Kaupule is responsible for reviewing and approving any new infrastructure to be built on the island. They have to make sure affected landowners are well compensated with an approved lease agreement, and minimal risks to neighboring residents and services.

3.1.2 Project Affected Communities and Individuals

- A) This group will include general community members who may be directly or indirectly affected by the TuSRAP Project. It will include:
 1. People living in neighbouring properties located adjacent to the runway and proposed asphalt plant, stockpile and laydown sites and significant haulage routes.
 2. Temporary/intermittent users of any proposed asphalt plant, stockpile and laydown sites being used for staging construction and stockpiling materials, e.g., informal recreational users. This includes groups who may use sections of the runway and curtilage for specific regular training activities, e.g. the youth groups mentioned below, as well as those who use these areas on less structured, casual basis, e.g. for social volleyball.
 3. Road users around the runway.

4. Businesses located in the vicinity of the airport and the runway who may be impacted by the works.
5. Groups affected by resettlement under the Tuvalu Aviation Investment Project (P128940), namely the Tuvalu National Council of Women (TNCW)

B) Falekaupule

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

Landowners

It is noted that all sites envisaged for the Project are on long-term government leased land. The Government of Tuvalu holds a head lease for all (with the exception of some isolated parcels) privately owned land in Funafuti, which enables them to use the land for any government purposes. Under the terms of this lease, there are no statutory requirements to consult with these lessor land owners on uses on this leased land. Land owners will be included by way of 'community' (A) above.

3.1.3 Civil Society and NGOs

This group includes smaller groups in society who may have an interest in the TuSRAP Project and its social and environmental aspects as they relate to their members and client groups. Those groups expected to be relevant have been identified below.

Women's Groups

The Tuvalu National Council of Women (TNCW) is a Non-Governmental Organisation (NGO) that was set up in the late 1970's to direct and manage women's affairs and their issues. The council consists of elected women and the formal link between Government and women's communities. TNCW has provided support in the area of women's political participation, women's handicrafts, legal literacy and recently ran programs on ending violence against women.

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

Island Youth Groups

Many islands of Tuvalu have active youth groups involved in a range of aspects of community life. Currently, they mostly use the runway as a temporary sport field during odd flight days.

TANGO

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

Organisations representing people with a disability

Fusi Alofa is the only representative organisation currently operating in Tuvalu. It will be included in Project-related consultations.

3.2 Disadvantaged Vulnerable Individuals or Groups

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

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

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

- people who live with a permanent or temporary disability or health condition that impairs their ability to participate equally in society (henceforth people with a disability);
- female-headed households;
- youth;
- economically disadvantaged;
- women;
- those most vulnerable to climate-related disasters, e.g., living along exposed ocean side of their islands.

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

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

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

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

Stakeholder Group	Characteristic	Specific Needs
People with a disability	Have core activity restrictions that often require support or removal of barriers to participation.	Accessible meeting spaces and information presented in an accessible manner: visual, audio, graphics, plain language, graphical, etc.)
Youth	Under 18's male and female	<ul style="list-style-type: none"> - Time meetings to accommodate household chores and/or agricultural duties. - Meeting locations and format should enable young people, particularly young women, to be free to voice opinions openly, namely that there are no cultural/customary protocols that may limit free expression. - If engagement is required on sensitive topics, the engagement medium and format and should ensure privacy and confidentiality.
Economically disadvantaged	People living on land they do not have legal right to – extent unknown	<ul style="list-style-type: none"> - Dedicated meeting for the economically disadvantaged (if identified on the island) to provide the space to provide their views. - Provide honorariums to cover travel costs and a light meal.
Women	<p>Women are more likely to experience limitations (self imposed or otherwise) on participating in additional community activities in addition to household, work and family commitments.</p> <p>Constraints on participating in meetings that conflict with household duties.</p> <p>Socially isolated women may have limitations on participation</p>	<ul style="list-style-type: none"> - Select meeting timing that accommodate/do not clash with women's existing workloads, both unpaid domestic work and paid work. - Meeting locations and format should enable women to be free to voice opinions openly, namely that there are no cultural/customary

	<p>in community activities, e.g., by coercive/controlling partners.</p> <p>Women are also at higher risk of family violence, and SEA/SH.</p>	<p>protocols that may limit free expression.</p> <ul style="list-style-type: none"> - If engagement is required on sensitive topics, the engagement medium and format and should ensure privacy and confidentiality. Child care is available. - Outreach by women's groups (e.g. TNCW) to include participation of potentially socially isolated women.
Those vulnerable to climate-related disasters	Live along the exposed ocean side of the islands in areas prone to inundation.	Ensure that individual invitations to these APs are hand delivered and encourage attendance at scheduled sessions.

4 STAKEHOLDER ENGAGEMENT PROGRAM

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

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

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

The key communication principles are to:

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

4.1 Purpose and Timing of Stakeholder Engagement Program

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

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

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

and community expectations, where the latter will be achieved by disseminating accurate information in an accessible way.

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

This will be achieved through:

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

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

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

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

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

Table 2: Engagement Mediums

Medium	Description
Stakeholder Meetings and capacity building	
Community consultations	These consultations are focused on identifying and discussing stakeholder concerns or to provide feedback with detailed information. These consultations should, wherever feasible, be held within the community environment. As necessary, specific consultations with women-only and vulnerable groups will be conducted. Consultations with women and vulnerable groups will not seek to ask them directly about experienced of stigma, discrimination or violence but to assess issues more generally to enable the development of effective risk mitigation and response strategies.

Focus Group Meetings	<p>The aim of a focus group is to bring together stakeholders with the same interest into a single meeting to discuss issues. Meetings usually have specific objective which are aligned with the interests of the stakeholders' present and potential issues the Project presents. As necessary, meetings with women and other vulnerable groups will be done separately to create a safe and more conducive environment for effective consultation.</p> <p>Focus groups will be used only on as as-needs basis in the event that specific issues emerge which require specific investigation.</p>
Agency forums/ round tables	<p>This method includes meetings with government departments and private sector stakeholders with relevant professional responsibilities (e.g., contractors or consultants). This often (either separately or together) includes key civil representative who represent the voice of women and other vulnerable groups.</p>
One-on-one meetings & phone calls	<p>This meeting creates an opportunity for more details discussion between the PMU/IA and the relevant individual stakeholder to address issues and clarify any given circumstances.</p>
Consultations with the Falekaupule	<p>These consultations are focused on identifying and discussing stakeholder concerns or to provide feedback using detailed information. It is also noted that women are not always equal participants in falekaupule spaces. Where women are not involved and able to participate openly and equally in theses consultations, separate consultations will be sought with women's representatives.</p>
Consultations with the kaupule	<p>The kaupule are the administrative arm of the falakaupule and are local government unit in Tuvalu. The kaupule are often responsible for land and natural resource use and management.</p> <p>The kaupule themselves will be engaged through one-on-one meetings. The kaupule also have a role in engagement in that they are responsible for coordinating falekaupule meetings, and will draft meeting minutes and prepare reports for the meeting.</p>
Written / visual communications	
Project Information Bulletin	<p>This needs to be a short and concise document providing jargon-free information describing the project actions, the potential social and environmental impacts, the need for the project and the contact details for the project team, including contacts for grievances relating to SEA /SH.</p>
Notice boards	<p>Notice boards (community and work site entrances) are a good tool to use for communication of up-to-date project information such as timing and duration of works, upcoming consultations, project progress and other relevant project information, including contacts for grievances relating to SEA /SH.</p>
Letters	<p>Formal method of communication usually intended to convey very specific messages. Alternatively, it is used as a formal method for request of information.</p>
Emails	<p>Using emails for in-country stakeholders can pose a challenge because of limited internet access due to insufficient telecommunications and/or supporting IT infrastructure. NGOs and most of the Government Ministries do have access to email which can be utilised for communications but arranging of formal community consultations is best arranged through other methods of communication.</p>
Media	

Radio	In Tuvalu, radio is the primary medium for raising awareness and prepare stakeholders for larger events or refined communication to take place. Radio will be an effective communication tool to circulate information of rights related to SEA/SH and processes to make grievances relating to SEA /SH.
Other	
PMU	PMUs will be the ‘familiar faces’ of the project and will, for many stakeholders at the community level, represent the most direct channel to the project. For this reason they will be trained specifically to ensure that they can receive contacts for grievances relating to SEA /SH while upholding a survivor-centered approach.
Telephone	Use of the telephone / mobile phone is still regarded as the preferred method for communication because of accessibility and speed. Having a discussion over a phone in order to ensure mutual understanding between two parties is quicker and easier compared to sending an email, waiting for reply.
GRM	The Project GRM is an important responsive tool to enable issues to be communicated and managed. The GRM is detailed in section 5.

The mode of consultation will vary according to the activity and the participants, but in all cases will promote participation by ensuring that the venue is accessible, the timing convenient and the manner of conduct of the consultation socially and culturally appropriate. Consultations will be announced to give sufficient notice for participants to prepare and provide input into relevant features of the project design (as detailed below in Table 3).

4.2 SEP Implementation Plan and for Information disclosure

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

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

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

Objective: the target that each activity needs to reach

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

Responsibility: who will lead this activity

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

Table 3: Stakeholder and Community Consultation Plan

No	TuSRAP Project Activity	Timetable	Objective	Stakeholders	Responsibility	Medium
A1	Asphalt plant, stockpile and laydown, and site selection	Prior to commencement of works	Discuss potential impacts and mitigation measures associated with specific site uses and options.	<ul style="list-style-type: none"> Aviation Department Lands Dept Public Works Department (PWD) Neighboring residents & business communities CPMO Kaupule Temporary/intermittent users (e.g. Informal recreational users) 	PMU (with CPMO support)	<ul style="list-style-type: none"> Community Consultations Focus group meetings Public meetings Emails and letters
A2	Disclosure of updates to the ESMP	Prior to works starting (development of CESMP)	To disclose ESMP	<ul style="list-style-type: none"> Aviation Department Lands Dept PWD Neighboring residents & business communities CPMO kaupule 	PMU (with CPMO support)	<ul style="list-style-type: none"> Newspaper Website Translated Executive Summaries
			<p>Advise stakeholders of final design, construction methods and updated mitigation and management plan.</p> <p>Advise project affected people of GBV risks and prevention strategies and worker behaviour</p>	<ul style="list-style-type: none"> Communities (including women, disadvantaged and vulnerable) Formal site users, e.g. State owned enterprises. Government agencies. Site users (if different from above) wide variety of stakeholders (political, religious or cultural leaders, health teams, local councils, social workers, women's organisations and groups working with children) 	PMU (with CPMO support)	<ul style="list-style-type: none"> One-on-one meetings Community consultations Translated executive summary available on islands Full reports available at PMU and on project websites Specific needs for women, disadvantaged and vulnerable groups (Table 1)
A3	Commencement of Works	Week before commencement of works.	To advise all stakeholders of commencement of civil works.	<ul style="list-style-type: none"> PWD Aviation Dept Lands Dept CPMO kaupule 	Contractor	<ul style="list-style-type: none"> Newspaper Email One on one meetings Specific needs for women, disadvantaged

No	TuSRAP Project Activity	Timetable	Objective	Stakeholders	Responsibility	Medium
						and vulnerable groups (Table 1) (on an as needs basis)
			To reconfirm ongoing consultation, feedback and GRM processes	<ul style="list-style-type: none"> Community (including women, women, disadvantaged and vulnerable groups) Site occupants (State owned enterprises. Government agencies) 		<ul style="list-style-type: none"> Community Notice Boards Community workshops and consultations Website Community Liaison Officer Specific needs for disadvantaged and vulnerable groups (Table 1) (on an as needs basis)
		At the start and ongoing throughout works	Ensure that the people affected by the project are properly informed of risks and aware of prevention and response strategies	<ul style="list-style-type: none"> Wide variety of stakeholders (political, religious or cultural leaders, health teams, local councils, social workers, women's organisations and groups working with children) 	Contractor and PMU (with CPMO support)	<ul style="list-style-type: none"> Community workshops and consultations Specific needs for women, disadvantaged and vulnerable groups (Table 1)
A4	Support to the TNCW's activities	During/after runway rehabilitation	To upgrade TNCW building to inclusive handicraft centre, sewing unit and other services.	<ul style="list-style-type: none"> TNCW Women Civil Aviation Dept PWD Kaupule 	Contractor and PMU (with CPMO support)	<ul style="list-style-type: none"> One-on-one meetings Specific needs for women, disadvantaged and vulnerable groups (Table 1)

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

All the public documents for TuSRAP will remain in the public for the duration of the project. This SEP will be updated and refined as needed throughout the lifecycle of the project. During this process the focus

and scope of the SEP will change to ensure that the MTET addresses external changes and adheres to the objectives of this Plan.

4.3 Proposed Strategy to incorporate the view of vulnerable groups

The Project will carry out stakeholder engagement which response to the needs of women and vulnerable groups to understand concerns/needs in terms of project design, operation and accessing information. The details of strategies to be adopted to effectively engage and communicate with women and members of vulnerable groups have been identified and will be implemented throughout TuSRAP (see Table 1 in Section 3.3). All affected communities and groups will be made aware of the project feedback and grievance mechanism.

4.4 Future Phases of projects

During the implementation of TuSRAP there will be ongoing engagement with the stakeholders and affected parties to keep them updated on the latest development of the project. Community consultations will be held at the various phases of the project (the site and construction preparation phase, construction and operation phase). The engagement level will depend on the level of impacts of the project and be responsive to emerging issues.

4.5 Responsibility for SEP Implementation

The implementation of the SEP will be the overall responsibility of the TuSRAP PMU. Responsibilities are indicated in Table 3.

The PMU will have an E&S Specialist who will be supported by the National and International ESS team within the Tuvalu Central Project Management Office (CPMO). Together they will take the lead role in the implementation of the SEP, with support from the TuSRAP Project Manager. The PMU will be responsible for arranging and facilitating the meetings as appropriate to their in-depth knowledge of the natural, social and traditional environments within Tuvalu. The PMU will also be the focal point for all stakeholder queries and contacts in relation to the implementation of the SEP or the GRM. The arrangements for SEA/SH specific GRM will be established in consultation with the Tuvalu Family Health Association (TuFHA), who have received training on SEA/SH counselling under the TV AIP project.

It is also the responsibility of the PMU to ensure that gender balance is achieved throughout the implementation of the SEP. To achieve this, the National E&S Specialist in the CPMO along with the TuSRAP Project Manager will make culturally appropriate recommendations on strategies to achieve this as per consultation options and strategies as detailed in sections 3.3 and 4.1.

As necessary, the project will also appoint a Grievance Steering Committee (GSC) which will be made up of PMU members, CPMO E&S Specialists, World Bank E&S Specialists, and as appropriate an external non-MTET GoTV ministry member. Specifically, where there are resettlement related grievances which have land access and physical works implications on government owned land and/or facilities the Department of Lands, Public Works Department and client ministries are required to be appointed as members of the GSC. The GSC will handle difficult to resolve greivances. Where necessary, the GSC will make recommendations on specific matters for consideration and resolution by the executive and/or cabinet with practical and effective resolution measures.

All contractors in charge of carrying out specific project activities will also be required to implement the relevant provisions of the SEP, as indicated in Table 3. The grievance mechanism requirements will be laid out in the tender documentation and in the Project ESMP.

4.6 SEP Budget

The project has \$90,000 allocated for a E&S Specialist. An indicative budget of \$15,000 USD will be available to cover activities in this SEP. These are captured within the Project's Incremental Operational Costs.

5 GRIEVANCE REDRESS MECHANISM

5.1 Definitions of Grievance

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

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

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

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

Key definition are as follows:

- Grievance: a claim raised by an individual or group whose livelihood, health and safety, cultural norms and heritage are considered to have been adversely affected (harm) by a project activity which, if not addressed effectively, may pose a risk to project operations (through stakeholder actions such as access road blockages) and the livelihood, well-being or quality of life of the claimant(s). This includes complaints which are an expression of dissatisfaction that is related to an impact caused by the project activities, which has affected (i) an individual or group adversely, (ii) the interests of an individual or group and who wants a proponent or operator (or contractor) to address and resolve it (e. g. problems related to dust deposition, noise or vibration).

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

- Negative impacts on communities, which may include, but not be limited to financial loss, physical harm and nuisance from construction or operational activities;
- Health and safety risks;

- Negative impacts on the environment; and
- Unacceptable behaviour by staff or employees. Project workers have a separate GRM under the TuSRAP Labour Management Procedure that they can use to register grievances with their working conditions or similar.

5.2 Purpose of the GRM

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

The key objectives of the GRM are:

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

5.3 GRM for TuSRAP

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

This GRM has been devised based on the lessons learned from the Tuvalu Aviation Investment Project P128940 (Tv AIP). Namely, to establish a GSC responsively on the escalation of the grievance, and nominate specific stakeholders to be involved in establishment of the GRM for SEA/SH grievances.

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

5.3.1 Community Level Grievances

There is the potential for community level grievances as a result of the Project activities. Issues related to worker behaviour, disturbances from workers accommodation, encroachment across land boundaries, noise, dust and resource use should be expected and planned for.

Discussions with the Kaupule under TVAIP have identified the following process which will be used to address the grievance that an AP may have. The key point of contact for the AP will be the Kaupule or the PMU, who will liaise directly with both the Contractor and the Supervision Engineer. The party receiving the grievance will receive and document all matters pertaining to the grievance and forward copies of all grievances to the Contractor, Supervision Engineer and PMU, which will operate under MTET.

All efforts will be made to address any community or individual grievances in a timely and transparent manner and without retribution to the affected person to minimize any impacts that may affect project implementation.

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

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

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

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

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

A separate grievance response mechanism that include channels for sensitive SEA/SH grievances to be managed will be established. This will be done in consultation with the Tuvalu Family Health Association, who have received training on SEA/SH counselling under the TV AIP project.

5.3.2 Project Level Grievances

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

Grievances may be submitted in person, via telephone, electronically, in letter or through a representative of the above community level process to the PMU. Grievances will adhere to this process and will submit (via recipient of grievance) directly via GCLS website or email to project PMU. All grievances must be formally registered in the Projects grievance register. Should the grievance be received by the Contractor

or Supervision Engineer directly, they will endeavour to resolve it immediately and submit notification of the grievances and resolution to PMU for entry into the grievances register or through the project website.

For all grievances across all the works, the PMU is responsible for ensuring that, on receipt of each grievance, the date, time, name and contact details of the complainant, and the nature of the grievance are recorded in the Grievances Register.

Should the complainant remain unsatisfied with the response of the Contractor, the grievance will be referred to the PMU Project Manager (PM).

Specifically:

1. The PM will take earnest action to resolve grievances at the earliest time possible. The AP will be consulted and informed of the course of action being taken, and when a result may be expected. Reporting back to the complainant will be undertaken within a period of two weeks from the date that the grievance was received.
2. If the PM is unable to resolve the grievance to the satisfaction of the AP, the grievance will then be referred by the PM to the Grievance Steering Committee (GSC). The GSC will be made up of PMU members, CPMO E&S Specialists, World Bank E&S Specialists, and as appropriate an external non-MTET GoTV ministry member. The GSC will be required to address the grievance within 1 month.
3. Should measures taken by the Grievance Steering Committee fail to satisfy the complainant, the aggrieved party is free to take his/her grievance to the Tuvaluan Court, and the Court's decision will be final.
4. The community will be informed of the GRM through a public awareness campaign and discussion with the Kaupule. The Project shall also erect appropriate signage at all works sites with up-to-date project information and summarizing the GRM process, including contact details of the relevant Contact Person. Public information bulletins websites and other public information will also include this information. Anyone shall be able to lodge a grievance and the methods (forms, in person, telephone, forms written in Tuvaluan) should not inhibit the lodgement of any grievance.

5.3.3 Tuvalu Judiciary Level Grievance Redress Mechanism

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

5.4 Grievance Documentation and Reporting

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

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

6 MONITORING AND REPORTING

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

The SEP will be evaluated by the PMU E&S Specialist every 6 months to ensure it remains relevant.

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

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

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

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

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

PMU will include progress on stakeholder engagement activities (SEP implementation) and status of grievances in the quarterly reports submitted to the Bank (IDA).

6.1 Involvement of the stakeholders in the monitoring activities

The GRM will allow stakeholders to submit grievances and other types of feedback. The identification of TuSRAP related impacts and grievances is a key element of stakeholder engagement that will occur over the complete TuSRAP life cycle. As such, the identification of new grievances and impacts as the project progresses will serve as an overall indicator for the utility of the stakeholder engagement process.

6.2 Reporting back to the Stakeholder Groups

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

Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. The monthly summaries will provide a mechanism for assessing both the number and the nature of grievances and requests for information, along with the project's ability to address those in a timely and effective manner. Information

on public engagement activities undertaken by the project during the year may be conveyed to the stakeholders through the projects periodic (monthly, quarterly or annually) reporting.

Appendix A: GRM Flowchart

