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# Kiribati Kiritimati Infrastructure Project

P181387

## STAKEHOLDER ENGAGEMENT PLAN

Prepared by

Ministry of Line and Phoenix Islands Development

and

Ministry of Information, Communication and Transport

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## Abbreviations

|        |  |
|--------|--|
| CESMF  | Country environmental and social management framework  |
| CESMP  | Construction environmental and social management plan (prepared by the contractor)               |
| CJD    | Civil and Joinery Division   |
| CPIU   | Central project implementation unit (within MLPID delivering the KSDP)                           |
| CRPD   | Convention on the Rights of Persons with Disabilities  |
| DSC    | Design and supervision consultant (recruited to support the PCU in delivery of the KKIP)         |
| ECD    | Environment and Conservation Division (in MELAD)   |
| EHS    | Environmental health and safety  |
| ESCP   | Environmental and social commitment plan (required by WBG for appraisal)                         |
| ESF    | Environmental and Social Framework (of the WBG)  |
| ESM    | Environmental and social management  |
| ESMP   | Environmental and social management plan (prepared for each of the KKIP components)              |
| E&S    | Environmental and social   |
| ESS    | Environmental and Social Standard (of the ESF)   |
| GBV    | Gender based violence  |
| GOK    | Government of Kiribati   |
| GRM    | Grievance redress mechanism (established for the project)  |
| ICAO   | International Civil Aviation Organisation  |
| KDU    | KEIDP Delivery Unit  |
| KFSU   | Kiribati Fiduciary Services Unit   |
| KIEDP  | Kiritimati Island Economic Development Program   |
| KILGA  | Kiribati Local Government Association  |
| KIMP   | Kiritimati Integrated Master Plan  |
| KKIP   | Kiribati Kiritimati Infrastructure Project (this project)  |
| KMFMRD | Kiritimati Ministry of Fisheries and Marine Resource Development                                 |
| KSDP   | Kiritimati Sustainable Development Platform  |
| KV20   | Kiribati 20-year Vision (long-term development plan)   |
| LMD    | Land Management Division   |
| LMDK,  | Land, Management Division – Kiritimati   |
| LPIIDS | Line and Phoenix Islands Integrated Development Strategy 2016-36                                 |
| MELAD  | Ministry of Environment, Lands and Agriculture Development                                       |
| MFED   | Ministry of Finance and Economic Development (executing agency)                                  |
| MICT   | Ministry of Information, Communication, and Transport (implementing agency)                      |
| MLPID  | Ministry of Line and Phoenix Islands Development (implmenting agency) also referred to as LINNIX |
| MWYSA  | Ministry for Women, Youth and Social Affairs   |
| OB     | Office of the President (Office of Te Beretitenti)   |
| OHS    | Occupation health and safety   |
| PAP    | Project affected people  |
| PAIP   | Pacific Aviation Investment Program (regional program financed by the WBG)                       |
| PCU    | Project coordination unit (supported by the DSC)   |
| PREP   | Pacific Resilience Program   |
| PSC    | Program Steering Committee   |
| SEAH   | Sexual exploitation, abuse and harassment  |
| SEP    | Stakeholder engagement plan (prepared for the project, required for appraisal)                   |

|      |   |
|------|---|
| SESA | Strategic Environment and Social Assessment |
| VAC  | Violence against children                   |
| WBG  | World Bank Group                            |

# 1. Introduction

## 1.1. Background and Context

**Location.** Kiribati is one of the most geographically remote island nations, with 21 inhabited islands scattered across 3.5 million km<sup>2</sup> of the Pacific Ocean. Its remoteness is compounded by the geographic dispersion of its islands, with a staggering distance of 3,285 km between South Tarawa (the country's capital) and Kiritimati. Kiritimati Island, the country's second-largest settlement (with a 2020 population of 7,380 people), is an island in the eastern Line Islands archipelago.<sup>1</sup> Kiribati is self-designated as a small island developing state and is also classified by its development partners as being a fragile and/or conflict affected situation.

**Human development.** Kiribati is ranked 137 out of 189 countries on the Human Development Index (2022), with 18 percent of its population living below the poverty line of US\$3.20 per person per day and a Gini index of 27.8 (2019), indicating a relatively low level of income inequality. Kiribati nation's small size and remote location significantly limit its economic opportunities, imposing constraints on trade, investment, and growth. It creates little formal employment opportunities or private sector jobs. Livelihoods are being subsidized across the country by unsustainable copra subsidies. Other livelihoods include artisanal fishing and subsistence farming, and the country's economy hinges on limited sources: sovereign wealth, fishing fees, remittances, and official development assistance.

According to the 2020 Kiribati national census, Kiritimati Island had several of the following socio-demographic and living standards characteristics:

- Low literacy - 27% aged 15yrs+ have 'some' or 'a lot of' difficulty writing or cannot write, compared to 22% average of islands and 12% in South Tarawa.
- High unemployment and low labor market participation - combined 56% of 15yrs+ population vs. an average of 49% average of all islands,
- Low levels of participation in enterprise activities - 14% of households of 'income from own business' vs. 22% for the average of all islands, which is also the same as in South Tarawa,
- In Kiritimati Island 40% of households have no toilet ("no facility or use beach, bush etc."), i.e. open defecation, and 39% of households use groundwater as drinking water via protected (21%) or unprotected (15%) wells.

There is evidence of limited citizen engagement on Kiritimati, with recent land use planning noting that participants indicated they had had no previous experience of being consulted about planning decisions and local government being unaware of major developments.<sup>2</sup> Strong support is indicated for the idea of further participatory planning consultations to provide for community input.

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<sup>1</sup> Kiritimati Island lies 232 km north of the equator and 2,160 km south of Honolulu. The island comprises over 70% of the total land area of Kiribati. The island is an atoll about 150 km in perimeter with a lagoon that extends over 48 km. The island has the greatest land area of any coral atoll in the world, about 388 km<sup>2</sup>; its lagoon is roughly the same size. There are five villages on the island, four populated and one abandoned: The Ministry of Line and Phoenix Islands Development is located in London (the main village).

<sup>2</sup> Project Planning and Management Ltd. 2018. *Integrated Land Use Planning for Kiritimati Island, Republic of Kiribati: Final Report*, European Commission.

**Vulnerability.** Kiritimati Island, like the rest of the country, faces development challenges due to its vulnerability to climate and external shocks. Rising sea levels, coastal erosion, storm surges, and saltwater intrusion threaten the country's coastal fisheries and natural resources, making them vulnerable to damage and loss. This is particularly critical as most of Kiribati's atolls are, on average, only 1.8 meters above sea level. Infrastructure across Kiribati is also critically exposed to the effects of climate change. It has been estimated that, without continued adaptation, Kiribati could face an estimated US\$8 to 16 million a year in climate change-related damages by 2050.

**Sustainable master planning.** The GOK is planning an overarching development approach for Kiritimati Island, known as the Kiritimati Island Economic Development Program (KIEDP), this in turn supports the Integrated Development Strategy (2016-36) for the Line and Phoenix Islands (LPIIDS), steering the island towards sustainable growth and resilience, addressing the challenges and leveraging the distinct opportunities of Kiritimati Island. Key undertakings include various infrastructure investments such as port facilities development for enhanced access, upgrading airport runways to improve air services, addressing environmental and biodiversity concerns through invasive species control, and significant upgrades to water systems and energy supplies. Additionally, the submarine cable project aims to connect Kiritimati internationally, promising improved digital connectivity. All of the foregoing require coordination between key agencies of the GOK and the Ministry of Line and Phoenix Islands Development (MLPID).

Together the GOK and the World Bank Group (WBG) have agreed to develop a program to support implementation of the LPIIDS and the Kiritimati Island Economic Development Program (KIEDP) to strengthen the enabling environment for sustainable and resilient growth in Kiritimati Island. The KIEDP is a long-term development program comprising a series of projects phased across multiple years and sectors. Currently a program preparation advance (PPA) is being developed to finance the Kiritimati Sustainable Development Platform (KSDP) as the first project to support implementation of the KIEDP through development of the Kiritimati Integrated Master Plan (KIMP), an institutional needs analysis (INA) and a strategic environmental and social assessment (SESA).

The SESA is a key instrument to identify and integrate environmental and social (E&S) considerations into the ongoing development of sectoral policy and plans, identify at a broad level the downstream risks and impacts of implementation of the KIMP, provide key data for the KIMP (carrying capacity, identification of 'no go' zones for development etc.) and helping inform the roadmap or blueprint of sustainable development of the island as well as the design of ensuing investment projects.

## 1.2. The Project

**Project context.** Kiribati's transport sector is critically exposed to the effects of climate change, with infrastructure assets at an elevation of less than three meters above sea level. Transport infrastructure is in urgent need of incorporating climate resilience measures and ensuring proper maintenance to withstand the increasing frequency and intensity of extreme climatic events.

The Kiribati Kiritimati Infrastructure Project (KKIP) is one of the ensuing projects under the KIEDP, consisting of "no-regret" foundational infrastructure for transport connectivity.

Subsequent projects will finance construction of a district hospital in Ronton (as additional financing for the Kiribati Health Systems Strengthening Project) and a new phase in the ongoing Pacific Islands Regional Oceanscape Program (PROP).<sup>3</sup>

**Project impact and objectives.** The KKIP is aligned with the GOK development priorities as documented in the *Kiribati 20 Year Vision 2026-2036 (KV20)*. The KV20 identifies transportation infrastructure to be one of the key drivers to enable economic development e.g. sustainable tourism as a potential stimulus for

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<sup>3</sup> Through the PROP, the WBG is working closely with Pacific governments and communities to help improve the sustainable management of ocean and coastal fisheries and to strengthen institutions responsible for conservation.

economic development is constrained by under-developed infrastructure and by limited transportation options. Improved transportation to carry tourists in and out of Kiribati is a key strategy to develop the tourism sector. The proposed project will also contribute to the achievement of *Kiribati Development Plan 2020–23* (KDP). The KDP seeks to implement the KV20, and focusses on six Key Priority Areas (KPAs), including “KPA 6: Developing our Infrastructure”. Under KPA 6 there are seven strategies, the fourth being: “improving roads and runways” and the fifth being “improving transportation services”.

Kiritimati Island holds potential to become an engine of economic growth and prosperity for Kiribati in the forthcoming decade, and an option for internal migration. KKIP will help to (i) mitigate economic isolation by encouraging regional and global integration; and (ii) build resilience against external shocks. These areas are especially pressing, noting that Kiribati is among the most remote and geographically isolated island countries.

**Project components.** The KKIP includes four components:

- **Component 1: Safe and Resilient Regional Infrastructure.** This component will improve climate resilience, safety, and security of the Cassidy International Airport infrastructure, and improve the resilience and safety of the airport precinct and connection roads. These elements will contribute to reliable regional air connectivity.. Improvements at the airport will include activities needed to comply with critical elements of aviation safety and security, such as runway and apron repairs, perimeter fencing; and installing and commissioning navigation and safety equipment. The upgrade of the airport connecting road will follow the existing horizontal alignment. The road design will pay particular attention to road safety and will incorporate adaptation measures necessary to mitigate the impacts of climate change
- **Component 2 Safe and Resilient Road Infrastructure** will rehabilitate the road between and within the towns of London and Tabwakea, improving climate resilience and safety.
- **Component 3** will support project implementation including the engagement of a project coordination unit and the associated equipment needed for implementing the project.
- **Component 4** will be a zero-value contingent emergency response component, following an eligible crisis or emergency, this component would provide access to uncommitted resources under the project to cover emergency response.

**Institutional arrangements.** The Ministry of Finance and Economic Development (MFED) will be the executing agency and the MLPID<sup>4</sup> (for the road upgradest) and the Ministry of Information, Communication and Transport (MICT) (for the airport upgrades) will be the implementing agencies for the KKIP.

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<sup>4</sup> MLPID is headquartered in London, Kiritimati, and focuses on the development of the Line Islands and Phoenix Islands. Given its remoteness from South Tarawa, it has wide-range of deconcentrated functions which would otherwise be filled by other line ministries. MLPID manages most of the infrastructure and services including power; water, sanitation and roads. The Ministry is organized in ten divisions: Development Planning; Water and Sanitation; Solar Salt; Heavy Machine and Mechanical; Civil and Technical (Civil Engineering); Construction and Joinery; Power and Energy; Housing; Information Technology; and Accounting.



To date, the MFED, through its Kiribati Fiduciary Service Unit (KFSU), has experience providing coordination, fiduciary (financial management, environmental and social management, and procurement), and environmental and social (E&S) risk management support to ten WBG-funded projects. The KFSU supports those projects' project management units in the line ministries responsible for implementation.

The MLPID is the responsible ministry for the development of Kiritimati and manages most of the infrastructure and services including power; water, sanitation and roads. Given its remoteness from South Tarawa, it has a wide-range of deconcentrated functions which would otherwise be filled by other line ministries. MLPID manages most of the infrastructure and services including power; water, sanitation, housing and roads and will be the implementing agency for the road upgrade component. As the MLPID has never been an implementing agency of a WBG project, it will benefit from the experience of KFSU staff who will support the KIEDP Delivery Unit (KDU) established to deliver the KIEDP and KSDP.

The MICT manages aviation in Kiribati, while the Civil Aviation Authority of Kiribati is the regulator. The Airport Kiribati Authority (AKA) operates and owns Cassidy Airport and has appointed an Airport Manager. Under arrangements with the Civil Aviation Authority of Kiribati, the Pacific Aviation Safety Office provides audit services against the ICAO standards. The United States Transportation Security Administration and the Federal Aviation Authority do their own audits as well, in regard to last point of departure status into USA ports. MICT will be the implementing entity for the upgrades to the airport.

The KDU will build on existing arrangements for the KFSU, which provides centralised implementation services to all ongoing WBG projects in Kiribati. The KDU will provide support to all projects under the KEIDP, including the KKIP. The KFSU is based in Tarawa, the KDU branch of the KFSU will be based in Kiritimati. The KDU, as the delivery mechanism for the KSDP will be established during the KKIP, ahead of the KSDP commencing. The KDU will support the PCU.

A project coordination unit (PCU) will be established to efficiently deliver the KKIP. Project-specific implementation functions will be provided by the PCU, which will include a project manager, technical/engineering roles, and E&S management support, provided by GOK staff (either seconded from local government or Tarawa or recruited anew) and engagement of a design and supervision consultant (DSC). The PCU will be Kiritimati-based, and possibly engaged through a consulting firm (rather than individuals) to deliver (DSC) tasks. As there is limited capacity at MLPID to manage a fleet of individual consultants, a firm or third-party implementer may be preferable because it would manage the risks associated with accommodation, incentivisation, and staff replacement.

The MLPID and MICT will each nominate an E&S focal point who will be supported through hands on implementation support from the firm supporting the PCU. This will contribute to longer-term capacity development of GOK and pool of E&S specialists in Kiribati.

A Program Steering Committee (PSC) chaired by the MLPID will oversee the project and provide high-level support and agency coordination. The exact composition of the PSC is to be confirmed, based on committees established for other projects, it is likely include: the permanent secretaries of MFED, MLPID, MICT, Ministry of Environment, Land and Agricultural Development (MELAD) and Mayor of the Kiritimati Urban Council (KUC), and directors of one or two representative civil society organizations (CSO)..

## 1.3 Environmental and Social Management Requirements

### 1.3.1 Environmental and social frameworks

**Country environmental and social management framework.** Kiribati has an existing system for ensuring that developments go through a process of environmental assessment, accessing land (as required), and complying with health and safety and labor conditions. The country environmental and social management framework (CESMF<sup>5</sup>) comprises a number of pieces of legislation and regulation. The key elements of the CESMF that are relevant to the program will be identified in the SESA and subsequent instruments developed for specific projects.

**The WBG Environmental and Social Framework.** The WBG's Environmental and Social Framework (ESF) comprises a policy and ten environmental and social standards (ESS). The ESS that are relevant to the KKIP are:

- ESS1 Assessment and Management of Environmental and Social Risks and Impacts
- ESS2 Labour and Working Conditions
- ESS3 Resource Efficiency and Pollution Prevention and Management
- ESS4 Community Health and Safety
- ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources,
- ESS8 Cultural Heritage, and
- ESS10 Stakeholder Engagement and Information Disclosure.

### 1.3.2 Approach to the due diligence

Key E&S instruments, as part of the environmental and social assessment (ESA), are required under both the CESMF and the ESF. Some instruments have been prepared to support appraisal and others will be prepared after appraisal. As the KKIP is being prepared under the WBG streamlining procedures fewer instruments are required as part of project appraisal. In addition, the Kiribati Aviation Investment Project (KAIP) prepared preliminary environmental and social management plans (ESMPs) for analogous project typologies (airport and roads components) and capture key E&S risks. These will be updated to align with the ESF during implementation.

An environmental and social commitment plan (ESCP) has been prepared. The ESCP sets out material measures and actions, any specific documents or plans, as well as the timing for each of these actions to be carried out by the GOK, including the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management and the E&S assessments and instruments to be prepared or updated, disclosed, consulted, adopted and implemented under the ESF and the ESSs, all in a manner acceptable to the WBG.

According to ESS10 - Stakeholder Engagement and Information Disclosure, the MLPID and MICT as the implementing agencies are required to provide stakeholders with timely, relevant, understandable, and

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<sup>5</sup> Also referred to as the 'Borrower Framework' in the ESF.

accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

This stakeholder engagement plan (SEP) has been prepared for the KKIP to facilitate its preparation and implementation. The SEP has been prepared according to the *Template for Moderate Risk Projects* (November 2023).

A review of the existing environmental and social management plan (ESMP)<sup>6</sup> for each of the project components has been undertaken. Tables have been prepared with a clear outline of what needs to be updated in each of the ESMP to ensure the ESMPs meet the requirements of the ESF and reflect any changes in scope.

Following an E&S risk screening, the KKIP has been initially assessed as moderate risk, based on the conditions that: (i) any materials required for the project will be only taken from the six licensed extraction sites whose capacity to supply the project will be assessed as part of the preparation of the ESMPs during implementation, and (ii) land acquisition will be avoided and/or minimized.

## 2. Objective of the SEP

The overall objective of this SEP is to define the stakeholder engagement for participation, public information disclosure and consultation throughout the design and implementation of the KKIP. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which stakeholders can raise concerns, provide feedback, or raise issues about specific program activities.

The ESS10 recognises the importance of open and transparent engagement between the KKIP and stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve environmental and social sustainability, enhance acceptance of both the KKIP. The objectives of the ESS10 are:

- To establish a systematic approach to stakeholder engagement that will identify stakeholders and build and maintain a constructive relationship with them, in particular, program stakeholders
- To assess the level of stakeholder interest and support for the KKIP and to enable stakeholders' views to be considered in KKIP design
- To promote and provide means for effective and inclusive engagement with stakeholders throughout the life cycle of the KKIP and particularly on any issues that could potentially affect them
- To ensure that appropriate information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format, and
- To provide stakeholders with an accessible and inclusive means to raise issues and grievances and allow the KKIP to respond to and manage such grievances.

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<sup>6</sup> ESMPs for the two KKIP components were developed under the Pacific Aviation Investment Program (2013 and updated in 2017 still under the older safeguard policies). However, the two Kiritimati subprojects were not implemented under that program.

Stakeholders (as detailed in Section 3) will have the opportunity to review the SEP and provide comments, including on the proposals for future engagement. The over-arching objectives of the SEP and stakeholder engagement process is:

- To establish a process for identification and participation of stakeholders and beneficiaries, including distinguishing between primary and secondary stakeholders
- To describe the timing and methods of engagement with stakeholders throughout the KKIP life cycle, as well as the type of information to be sought from them
- To receive information about KKIP concerns and issues from stakeholders
- To disseminate full and accurate information about the KKIP to stakeholders including objectives, processes, activities, risks and mitigating measures.
- To confirm the participation of stakeholders by working with local authorities and civil society organizations, engaging with local communities through key leaders and vulnerable groups, and the dissemination of information in a culturally appropriate manner
- To describe the measures that will be used to remove obstacles to participation to provide a meaningful consultation process with the stakeholders that fosters communication through dialogue and enquiries
- To articulate who is responsible for this process within the MLPID, MCITTD and/or the PCU to support this process
- The inclusion and participation of all beneficiary groups (including women and youth) and including those who are potentially vulnerable or disadvantaged (such as the poor, disenfranchised, elderly, people living with disability). Where applicable, the SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable
- To confirm a grievance mechanism (GM) process, suitable to the KKIP, is put in place and accessible to stakeholders, to identify its purpose and to also provide guidance to the process. The GM will outline specific guidance required to deal with gender-based violence (GBV), violence against children (VAC), and or sexual exploitation and abuse (SEA) and sexual harassment (SH) including involvement of specialists as required, implementing a survivor-centred approach, and establishing the need for confidentiality, and
- To enable stakeholder feedback to be received and incorporated/considered.

Stakeholder participation and communication is essential in both the preparation and subsequent implementation of the KKIP. Lack of stakeholder inclusion will likely result in ensuing project design being faulty as a result of non-inclusive and/or underrepresented data. However, over-engagement with communities can lead to stakeholder burnout, and this will be a key factor to consider given the small island population and relatively restricted pool of stakeholders involved in the KKIP delivery. Therefore, a balanced approach to the sharing of information during KKIP phases, as well as obtaining relevant information from project consultations will be crucial.

## 3. Stakeholder Identification and Analysis

### 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 the KKIP, 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 KKIP, stakeholder groups include the different island communities and sub-groups within those communities, Island Council and local government, national government authorities. Stakeholders for the two components will include common groups but each component will also include stakeholders unique to the activities and project area of that component. These have been, and will continue to be, identified on an ongoing basis by:

- Identifying the various categories of parties who may be affected by or interested in the component(s), and
- Identifying specific individuals or organizations within each of these categories taking into account:
  - The expected area of influence of the component 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 communities and parties including types of government bodies, CSOs, 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 KKIP 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.

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.

### 3.2 Principles and Methods of Engagement

The KKIP will apply the following principles for stakeholder engagement:

- Openness and life-cycle approach – engagement and consultations for the KKIP will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation

- Informed participation and feedback - information will be provided to and widely disseminated among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns, and
- Inclusiveness and sensitivity - stakeholder identification is undertaken to support better engagement and build effective relationships. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnically or culturally distinct groups.

In order to develop an effective SEP, it is necessary to determine who the stakeholders are and understand their needs, expectations, priorities and objectives in relation to the KKIP. This information will be used to tailor engagement to each key stakeholder.

Engagement will be directly proportional to the risks and impacts of the activities of each component. As the extent of the risks and impacts of a subproject activity on a stakeholder increases, the level and type of engagement needs to be assessed and adjusted.

With the risks associated with the KKIP identified as moderate, the project consultation will build upon existing knowledge and support, and focus on targeted consultation, with project messages building upon existing information and understanding of the previous projects. Engagement will be targeted with the key stakeholders initially identified, however as the KKIP progresses additional stakeholders will be identified through assessment processes such as the updating of SEP and the two ESMPs.

### **3.3 Stakeholders mapping and analysis**

For the purposes of effective and tailored engagement, stakeholders of the KKIP can be divided into the following categories:

- Primary stakeholders – are ‘project affected parties’ including project affected people (PAPs) who will be both beneficiaries of and potentially affected by the project, as well the institutions, entities and groups that are responsible for implementing elements of the KKIP or will be directly influenced by the KKIP i.e. those who need to be closely engaged in the design and implementation of the KKIP This includes disadvantaged or vulnerable groups who 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 due to their vulnerable status, and who may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the KKIP
- Secondary stakeholders – ‘other interested parties’ that may not be directly responsible for KKIP implementation but who may have a stake or interest in the development of Kiritimati Island and who consider or perceive their interests as being influenced by the project and/or who could affect the KKIP implementation in some way,

#### **3.3.1 Primary stakeholders - ‘project affected parties’**

Primary stakeholders will be the ‘project affected parties’ including project affected people (PAP) who are individuals or groups, government institutions and line ministries, and other parties that may be that are responsible for implementing elements of the KKIP or will be directly influenced by the project, and who need to be closely engaged in the design and implementation of the KKIP (including the updating of the two ESMP).

The identified primary stakeholders of the KKIP include:

- PAPs as described in detail below
- Key government stakeholders and line ministries who have a statutory and/or institutional role in aspects of the project and who may have assets and operations directly affected (positively and potentially negatively) including, but not limited to: MFED (and the KFSU), MLPID, Ministry of Environment, Lands and Agricultural Development (MELAD)<sup>7</sup>, Island Council and the KUC, and
- Key entities and groups responsible for delivering specific elements of the KKIP i.e. the PSC, PCU and the civil works contractor(s).<sup>8</sup>

The PAP are those people that are directly or indirectly affected by the project's activities, either adversely affected by the project impacts and/or able to take advantage of a project's benefits. Components 1 and 2, as the elements of the project with civil/physical works, will have the greatest impacts and risks associated with the community and will require detailed and frequent consultation. The extent of the project's area of influence will be determined through the E&S assessment process, and will be established in the ESMP and land due diligence reports which will identify the directly and indirectly PAP and the sensitive receptors.

The risks and impacts will be experienced within the immediate construction footprint of each of the components (i.e. the area immediately adjacent to the airport and along the airport to London road) as well as along the haulage routes, areas adjacent to materials extraction sites and stockpile areas, and adjacent to contractor facilities such as site office, works yard, and construction/workers camp or accommodation(if required), and broader area of influence for services, facilities that are affected, e.g. by influx workers, where employment is drawn from, and where downstream environmental impacts may be felt, e.g. on local ecosystem services. The consultations with PAPs will present information about the likely E&S risks and issues and how the project proposes to mitigate them, which will be identified by the PCU and DSC and documented in the ESMP during the detailed design phase and prior to start of construction.

Following project approval (including issue of the environmental license for the overall project) and prior to the commencement of any physical works, the selected contractor(s) will develop their construction ESMP (CESMP) which will include, specific to each project component, how each of the contractors will deliver the construction-relevant elements of this SEP and the GM (below). The contractors will also be responsible for conducting any due diligence, including consultations and stakeholder engagement, for elements of their construction approach or methodology which require an environmental licence or permits.

PAPs include:

- Individuals, households, communities, or business entities providing land or access to land and/or resources for the project, and
- Communities, households, business entities, local civil society organisations (CSOs), local faith-based organisations (FBOs), or individuals as sensitive receptors i.e. directly adjacent to the construction activities (including work sites, construction camp, haulage routes, and extraction sites) and be impacted by such issues as influx of labor, construction noise, dust, pollution, hazardous substances and waste, access and traffic, and community health and safety issues (that will be further identified in the project's ESMPs).

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<sup>7</sup> MELAD is the regulatory agency, and through the Environment and Conservation Division (ECD) will review the ESMPs developed for the project, issue the environmental license for the project, and be involved in the monitoring of project compliance with the conditions included in the environmental license. The MELAD also includes the Land Management Division (LMD), the primary entity involved in supporting the land access requirements for the project.

<sup>8</sup> Other key actors, who are the implementing agencies, including for this SEP, include: the PCU, the DSC recruited to support the PCU and prepare feasibility studies, technical designs, and the E&S assessments and instruments.

### 3.3.2 Secondary stakeholders – ‘other interested parties’

The KKIP secondary stakeholders include parties other than those directly involved in KKIP design and implementation, but who may have a stake or interest in the development of Kiritimati Island more broadly and who consider or perceive their interests as being influenced by the project (positively and negatively) and/or who could influence the KKIP implementation in some way.

This group of stakeholders includes those that need to be kept updated as the project progress and may also need to be consulted from time to time.

- National CSOs and non-governmental organizations (NGOs),
- Local business organisations, e.g. the Chamber of Commerce.
- Other GOK line ministries; MLPD, (CJD, WSD, WCD-ECD, LMDK, KMFMRD), the Office of the President/Office of Te Beretitenti (OB), Ministry of Health (whose services may be affected, e.g. through changed response times during construction and increased demand on health services by influx workforce) and
- State-owned enterprises (SOE) which may not be part of the PSC but which may still have some information or insights to provide to the design and implementation of the project.<sup>9</sup> Relevant SOEs such as Kiribati Ports Authority, BwebwirikirNET Ltd, Civil Aviation Authority of Kiribati, Kiribati Land Transport Authority, and Airport Kiribati Authority and other enterprises and private sector entities including Public Utility Board, Air Kiribati Ltd, Kiribati National Shipping Line, Kiribati Oil Company Ltd, Kiribati Copra Cooperative Society, and Amalgamated Telecom Holdings (Kiribati) Limited, and
- Development partners including: Australian DFAT, New Zealand MFAT, European Union, SPREP, and Secretariat for Pacific Community (SPC) other development partners with pipeline projects in Kiritimati Island.

### 3.3.3 Disadvantaged or vulnerable individuals and groups

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project. The implementation of this SEP shall ensure that awareness raising and stakeholder engagement is designed to take into account such groups' or individuals' particular barriers to participation, sensitivities and concerns and to ensure a full understanding of project activities and provide opportunities to take advantage of its benefits, e.g. project employment, improvements in accessibility to services.

Engagement with vulnerable groups and individuals often requires the application of specific and differentiated engagement methods to facilitate their participation in the project-related consultation and decision making..

Within the KKIP, vulnerable or disadvantaged groups may include but are not limited to the groups experiencing barriers to accessing or being opportunity to provide, information, or take advantage of KKIP benefits. Examples include elderly people, persons with disabilities and their carers, households headed by women, sexual and gender minorities, households living in poverty, the unemployed, and any disadvantaged groups.

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<sup>9</sup> These line ministries may include Ministry of Infrastructure and Sustainable Energy; Ministry of Foreign Affairs and Immigration; Ministry of Culture and Internal Affairs; Ministry of Employment and Human Resource; Ministry of Health and Medical Services; Ministry of Commerce, Industry and Cooperatives; and Ministry of Fisheries and Marine Resources Development.



Initial engagement could be through the CSO and NGO representing these groups of people including Kiritimati Island chapters of Kiribati Women and Children Support Centre, and, in as far as they exist on Kiritimati, *Te Toa Matoa* (the umbrella group for people with a disability) and KANGO – Kiribati Association of NGOs, Our Lady of Sacred Heart Crisis Centre, Alcohol Awareness and Family Recovery Centre, Kiribati Women in Maritime Association, and handicraft producers association(s).

This SEP includes specific engagement methods to ensure that vulnerable and/or disadvantaged groups are included.:

- Women - ensuring that engagement teams are gender-balanced and promote women's leadership within these, designing online and in-person surveys and other engagement activities so that women in unpaid care work can participate; considering provisions for childcare, transport, and safety for any in-person community engagement activities. There may also be women who face multiple challenges, for example, women with disabilities, women with significant caring responsibilities, women experiencing high burdens of household work etc.
- Elderly and people with existing medical conditions - developing information on specific needs and explain why they are at more risk and what measures to take to care for them; tailoring messages for particular living conditions and health status; targeting family members
- People with disabilities – providing information in accessible formats, such as large print and/or with translation services offering multiple forms of communication, such as text captioning or signed videos, text-to-voice conversion, text captioning for the hearing impaired, and online materials for people who use assistive technology, and
- Children and youth - designing information and communication materials in a youth and child-friendly manner and providing parents with skills to help disseminate important information for the child/youth audience.
- Poor (or those living in hardship), and
- Sexual or gender minorities.

There are possibly other disadvantaged or vulnerable groups present on Kiritimati such as recent arrivals, people at risk of involvement in sex work, long-term unemployed, people with low literacy and educational attainment, and members of the LGBTI community, people with substance use disorders.

### **3.3.4 Stakeholder analysis**

In order to develop an effective SEP, it is necessary to not only determine who the stakeholders are but, to understand their needs, expectations, priorities and objectives in relation to the KKIP. This information will be used to tailor engagement to each stakeholder.

Key characteristics of Kiritimati stakeholders have been previously identified in other projects including; low level of access to technology; potentially low levels of technical knowledge, e.g. reading detailed plans, schedules and technical reports; low appreciation of environmental and social changes associated with major infrastructure projects, and available but unreliable access to internet and social media.

Preferred methods of communication previously identified include emails, social media messaging tools, radio and phone (mobile and landline) for community and CSO and local government and Unimwane via KILGA phone and email for GOK staff, Island Council and the KUC.

The approach is summarized in Table 3.1.

**Table 3.1: Stakeholder analysis**

| Stakeholders  | Interest in the project   | Role/Influence in the project  |
|---|---|--|
| <b>Primary stakeholders</b>   |   |  |
| <ul style="list-style-type: none"> <li>PAP (community, household and individual levels)</li> </ul>  | <ul style="list-style-type: none"> <li>Directly and/or indirectly affected by the project</li> <li>Inputs to the successful implementation of the KKIP</li> </ul>   | <ul style="list-style-type: none"> <li>Providing information on perceptions about risks and impacts, assisting identify mitigation measures</li> <li>Inputs to KKIP design and implementation</li> <li>Consultation on KKIP and relevant activities</li> </ul>   |
| <ul style="list-style-type: none"> <li>Key government stakeholders incl. MFED (incl. KFSU), MLPID, MICT, MELAD, PSC</li> </ul>  | <ul style="list-style-type: none"> <li>Line ministry or entity directly involved in KIEDP implementation</li> <li>Line ministries with representation on the PSC</li> <li>Regulatory agencies with role in project preparation, implementation and monitoring</li> <li>Coordination among different ministries, entities, authorities, and the island community</li> <li>Supporting the successful implementation and completion of the KKIP</li> </ul> | <ul style="list-style-type: none"> <li>Providing information on country system processes and requirements, assisting identify mitigation measures</li> <li>Managing KKIP design and implementation</li> <li>Consultation on KKIP and relevant activities</li> <li>Coordination of stakeholders including PSC</li> <li>Ensuring participation and feedback mechanisms are in place</li> <li>Facilitating review and clearance of project documents</li> </ul> |
| <ul style="list-style-type: none"> <li>Island Council and KUC</li> </ul>  | <ul style="list-style-type: none"> <li>Representation on the PSC</li> <li>Role in project preparation, implementation and monitoring</li> <li>Coordination among different ministries, entities, authorities, and the island community</li> <li>Supporting the successful implementation and completion of the KKIP</li> </ul>  | <ul style="list-style-type: none"> <li>Providing information on local networks, bylaws and protocols, and assisting identify mitigation measures</li> <li>Managing KKIP design and implementation</li> <li>Consultation on KKIP and relevant activities</li> </ul>   |
| <b>Secondary stakeholders</b>   |   |  |
| <ul style="list-style-type: none"> <li>Representatives of the Kiritimati Island community (individuals, households and businesses with a stake in development of the island and potentially affected by ensuring projects)</li> <li>Other government stakeholders incl. line ministries not represented on the PSC, OB and SOE etc</li> <li>Development partners</li> </ul> | <ul style="list-style-type: none"> <li>Coordination and collaboration</li> <li>Information sharing</li> <li>Support KKIP implementation</li> <li>Climate and/or disaster risk management issues affecting project design and/or implementation</li> </ul>   | <ul style="list-style-type: none"> <li>Providing information to PCU on other developments or projects etc of relevance to KKIP</li> <li>Supporting key consultation activities including stakeholder mapping, communications, and messaging as required</li> <li>Establishing communication lines and protocols / processes for community stakeholder participation</li> <li>Distribution of information</li> </ul>  |

| Stakeholders   | Interest in the project   | Role/Influence in the project   |
|--|---|---|
| Private sector and other enterprises incl: <ul style="list-style-type: none"> <li>• Business entities, retailers, business owners</li> <li>• Kiribati Chamber of Commerce &amp; Industries</li> <li>• Transport and tourism sector operators</li> <li>• Materials (sand, aggregate etc) suppliers</li> </ul> | <ul style="list-style-type: none"> <li>• Provide information to key aspects of design and/or implementation of the KKIP</li> <li>• Cooperation with MLPID for success of the project</li> <li>• Airport, road and transport (air and road) users</li> </ul> | <ul style="list-style-type: none"> <li>• Be provided with project information</li> <li>• Consultation on the project impacts and mitigation measures</li> <li>• Provide feedback and submit grievances</li> </ul>   |
| Community groups, CSO and NGO: <ul style="list-style-type: none"> <li>• Te Toa Matoi- umbrella group for persons with a disability</li> <li>• KANGO – Kiribati Association of NGOs</li> </ul>  | <ul style="list-style-type: none"> <li>• Identification of social and environmental information and issues for inclusion in the ESMPs</li> <li>• Specific issues and risks for persons with disabilities</li> </ul>   | <ul style="list-style-type: none"> <li>• Be provided with KKIP information</li> <li>• Consultation on KKIP objectives and outcomes .</li> <li>• Information provision to the updating of the SEP and ESMPs</li> <li>• Provide feedback and submit grievances</li> </ul> |

### 3.4 Engagement Methods

Adequate stakeholder consultation will require timing and advance planning. To ensure information is readily accessible, and delivered in appropriate methods, to affected stakeholders, and adequate representation and participation of the different groups in the process, the KKIP will adopt different methods and techniques based on stakeholder needs.

Methods for engagement are given in the Table 3.2. 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 3.2 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 has already tested and successfully used for other projects in Kiribati (including on Kiritimati).

**Table 3.2: Methods of communication and engagement**

| Medium   | Description  |
|--|--|
| <b>Stakeholder meetings, face to face engagement and capacity development</b>  |  |
| Community / focus group meetings, community-based consultations (or committee meetings)<br><br>(for: communities, CSOs, FBOs, private sector stakeholders) | <p>The focus group approach will pull together stakeholders with similar interests (for example members of faith-based organizations, young people, women) into meetings to discuss issues and get feedback on designs, construction approach and environmental and social risk management methods. Meetings usually have a specific objective aligned with the project stage, expectations and interests of the stakeholders' present, facilitate stakeholder input into the planning and implementation process and provide a forum for concerns to be discussed. This method also includes meetings with</p> <ul style="list-style-type: none"> <li>• Community groups in each affected village including separate groups of women, men and young people,</li> <li>• private sector stakeholders</li> <li>• key civil society representatives who can represent the voice of special interest groups including women, young people disadvantaged or vulnerable people (see below further on key informant interviews).</li> <li>• FBOs which have a strong connection to and influence within to their communities.</li> </ul> <p>SEP work planning will include specific composition, location and frequency of the committee meetings to cover at a minimum those defined above. These consultations are focused to identify and discuss stakeholder concerns or to provide feedback using information provided in plain language, user-friendly formats and preceded by capacity building amongst participants to support them in interpreting complex information. These consultations should, wherever feasible, be held within the communities, for example in church maneabas<sup>10</sup>, and include female-only consultations and specific consultations with disadvantaged or vulnerable groups. Consultations with women and vulnerable groups will not seek to ask them directly about experiences of stigma, discrimination or violence but to assess issues around access to decision making and information, more generally to enable the identification of risks and development of effective risk mitigation measures to be incorporated into the ESMPs.</p> |
| Key informant interviews<br><br>(including for disadvantaged people or groups)   | <p>Consultation with directly affected people including disadvantaged or vulnerable groups can be done separately as interviews. People in these groups sometimes have sensitive living circumstances meaning that group discussions do not always provide the supportive, sensitively managed and confidential interactions necessary. A personal (key informant) interview is one of the most common means for collecting qualitative information with disadvantaged or vulnerable groups. Talking face to face with respondents on sensitive matters with vulnerable people requires interviewers with sensitivity, skill, and the ability to interpret and respond to both verbal and nonverbal cues.</p>  |
| KUC consultations  | <p>These consultations will be undertaken to provide detailed briefings, discuss councilor ideas, interests and concerns or to provide feedback to the project. These consultations will be face-to-face meetings with the councilors as an official group.</p>  |
| Government Advisory Committee  | <p>This group will be the Kiritimati-level 'partner' to the PSC and will comprise representatives of line ministries, the KUC and SOEs. The KUC mayor will be on this committee. This group will provide oversight and government coordination at the local level (as opposed to national level through the PSC). It will provide a consolidated two-way information channel. Engagement will be through meetings, with minutes recorded and feedback to the PCU. Members of this group may be invited to participate in community meetings to discuss any matters pertaining to line ministries or local government.</p>  |
| Information and awareness campaign   | <p>This will include specific campaigns to address risks identified in the ESMP such as communicable diseases and GBV/SEA/SH as well as general project information dissemination programs.</p>  |
| <b>Written and visual communication</b>  |  |

<sup>10</sup> To be done on a rotating basis so all church maneabas have a turn hosting meetings.

| Medium                       | Description  |
|------------------------------|--|
| Project information brochure | 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 grievance redress or complaints relating to SEA /SH. The brochure should identify other documents available for review and include maps and diagrams.   |
| Notice boards                | Notice boards (community and work site entrances) are a good tool to use for communication of up-to-date project information such as timing and duration of works, upcoming consultations, project progress and other relevant project information, including contacts for grievance redress or complaints relating to SEA /SH.  |
| Letters                      | Formal method of communication usually intended to convey very specific messages. Alternatively, it is used as a formal method for request of information or invitation to participate in a meeting or workshop.   |
| Emails                       | Using emails for in-country stakeholders can pose a challenge because of limited internet access due to insufficient telecommunications and/or supporting IT infrastructure. NGOs and most of the GOK do have access to reliable email which can be utilized for communications but arranging of formal community consultations is best arranged through other methods of communication.   |
| <b>Media</b>                 |  |
| Radio                        | Radio is a 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 general project information, venues and dates of public meetings and/or workshops, where information can be accessed, and contacts for grievance redress or complaints relating to SEA /SH.  |
| Social media                 | Use of existing GOK webpages (Facebook, twitter etc) established by MICT and MLPID. A project specific website may also be established.  |
| <b>Other channels</b>        |  |
| PCU                          | The PCU will be the 'familiar face' of the project and will, for many community stakeholders, represent the most direct channel to the project. For this reason they will be trained specifically to ensure that they can receive complaints relating to SEA /SH while upholding a survivor-centered approach. A combination of face-to-face and remote communications (support and other stakeholders based in Tarawa) will be required.  |
| 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.  |
| Surveys                      | A combination of online and face-to-face surveys can be used, depending on the type of information required and how it is intended to be used. To avoid consultation fatigue, surveys should only be considered if required data is not available through existing secondary sources.<br><br>It is noted that the Ministry of Health undertake annual population surveys in Kiritimati. There may be an opportunity to either a) include questions in this survey, and/or b) utilize enumerators and household identification systems to administer a survey. Surveys have also been conducted to obtain data about people with disabilities and household income and expenditure. |

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

Table 3.3 sets out the stakeholders initially identified by their main stake in the project and the type of engagement.

**Table 3.3: Stakeholders and engagement needs**

| Stakeholder  | Main roles, and engagement needs   |
|--|--|
| <b>Primary stakeholders</b>  |  |
| Project Coordinating Unit (PCU)  | Responsible for implementing the SEP; to ensure the project GM is established and functions well; facilitate disclosure of all documents and information; ensure all stakeholder engagement requirements are included in the TOR of contractors (including DSC consultant), and to ensure that the civil works contractor(s) develop and submit for review and clearance the required documentation (i.e. construction ESMP and applications for environmental license(s) and/or permit(s)), ensure all national stakeholder engagement requirements are adhered to, and to support contractor(s) relay information to, and conduct consultations with, relevant stakeholders, provide monitoring reports of stakeholder engagement throughout |
| Implementing agencies – MLPID and MICT   | To be fully briefed on, and aware of, their responsibilities, including stakeholder engagement responsibilities, under the ESCP; to be kept updated by the PCU on project progress and issues; at line ministry level will be members of the PSC; to support disclosure of all project documents on their websites; to keep the PCU informed on relevant ministry and GOK policies that may affect design and/or delivery of the KKIP.   |
| Executing agency - MFED  | Responsible for ensuring the overall compliance of the project with the agreements committed to by the GOK; potential member of the PSC; to be kept updated by the PCU on project progress and issues and to disclose all project documents on its website.  |
| Program steering committee (PSC) and advisory committee  | To be kept updated at a general level by the PCU to provide high-level support as required to resolve project issues; and to assist in resolving project-level grievances as required  |
| Ministry of Environment, Lands and Agriculture Development. (MELAD – ECD and LMDDSC)   | To provide advice and assistance on environmental and land access issues; member of the PSC; is the regulatory agency and will review and approve instruments (ESMPs and land surveys and due diligence reports and/or land access arrangements ) and will issue the environmental license for the project   |
| Ministry of Women, Youth and Social Affairs  | Has the mandate to support development of, women youth, and girls; member of the PSC; supporting key project consultation including vulnerable stakeholder mapping, communications, and messaging. Delivers psycho-social counselling support services, case management and referral thus is part of service system potentially responding to instances of SEA/SH.   |
| Project affected people (PAP)  | People directly affected by and/or potentially benefitting from project design and implementation including by design decisions, construction activities, access to materials sites, and/or maintenance and operations activities and services to be provided; to be consulted where direct impacts or benefits have been identified through the impact assessment process (ESMP updating) and engagement process; to be kept informed and have ample opportunity to provide feedback and/or submit grievances during various stages of the project.   |
| Kiritimati Urban Council   | Key partner in overall KIEDP and KSDP process as well as informing the design and implementation of the KKIP; potential member of the PSC; to be involved in consultation and information collation/ dissemination; to be consulted during the design/approval and construction phases to seek feedback on key issues such as environmental and social risks which could affect project design (availability of construction materials, waste management etc)  |
| Disadvantaged or vulnerable incl. elderly, people with disability, poor households, single parents, children and youth, long-term unemployed, others yet to be identified) | This is a key group to be consulted during the design/approval and construction phases of the project; to be kept updated by the PCU on project progress and issues. Formal consultation will be required with these stakeholders though methods identified.   |
| Design and supervision consultant (DSC)  | Will support the PCU during design and implementation of the project; to undertake consultation on proposed design and activities with key stakeholders and the community on all issues and changes related to design and construction, procurement, and E&S.  |
| Contractor(s)  | Will deliver the civil /physical works components of the project; to be informed about contract opportunities; to develop their CESMP which will include component   |

| Stakeholder  | Main roles, and engagement needs  |
|--|---|
|  | specific details for implementation of the SEP and GRM; to keep the communities informed of their activities and construction schedule; and to undertake community awareness and consultation activities as required by the approved CESMP, provide monitoring reports of implementation of their SEP requirements.   |
| <b>Secondary stakeholders</b>  |   |
| OB, line ministries and SOEs   | Ministries and SOEs not included as members of the PSC but which may have ad hoc interest in the project; to provide information and/or insights (based on experience) to project design and implementation.  |
| Community groups, CSO and FBOs   | Key advisors on existing and possible new programs and activities to support women and children's, people with disability, elderly access and safety; potential beneficiaries or support for service delivery ; to be kept informed of all project activities and have ready access to project documents and access to channels for communicating feedback and grievances; to participate in consultation around community programs; provide information to key documents such as project designs and construction plans, SEP updating, ESMPs etc |
| Business entities and chamber of commerce  | To be consulted on project design and implementation more widely and regarding any specific expert advice and advocacy  |
| Media  | Potential communications partners and also interested parties; to be engaged to channel information, awareness campaigns and provide feedback   |
| General public   | To be kept informed of all project activities and have ready access to project documents and access to GRM; to provide feedback; to be provided the opportunity to participate in consultation  |
| Vulnerable stakeholders (incl. elderly, people with disability, the poor, single parents, children and youth, others to be identified) | Distinct from the vulnerable PAP, this group of stakeholders are to be consulted during the design/approval and construction phases of the project, and to be kept updated by the PCU on project progress and issues  |
| Development partners   | To provide information about baseline research and engagement with the GOK and partners, and ongoing or pipeline projects in Kiritimati Island which may affect the design and/or implementation of the KKIP and conversely over which the KKIP may have some influence or effect.  |

## 4. Stakeholder Engagement Plan

### 4.1. Stakeholder Needs and Engagement

Different engagement methods are proposed to cover different stakeholder needs: public meetings, focus group meetings/discussions, community consultations, formal meetings, one-on-one and key informant interviews, and site visits. All KKIP documents, including this SEP and potential updates, will be disclosed on the GOK and the WBG websites to seek community feedback.

Annex A presents the detailed explanation of the engagement process and stakeholders, the points below summarise this information.

**Engagement process.** The engagement for the KKIP will be conducted at a number of levels; engagement with GOK stakeholders (line ministries, authorities and SOE) will focus on coordination for delivering the overall project, and engagement with communities, PAP, and beneficiaries.

- First consultations will provide stakeholders with information about the KKIP and the ensuing E&S assessment and engagement processes to raise awareness about the process of consultation (including socialization on the project's GRM) and information disclosure to feed into the proposed designs.,
- Potential risks and impacts, and what is required to avoid and/or mitigate the adverse risks and impacts to be discussed. This will enable primary stakeholders to provide feedback and information that can be integrated into, and help refine, the E&S assessments (ESMPs and land due diligence) ahead of feedback or input through the more formal review and approval process through the CESMF.<sup>11</sup>
- Subsequent engagement will include more focused smaller (including one-on-one where necessary) consultations, to provide updates on project progress including status of various technical and due diligence investigations and assessments including compilation of further information and data gathered.
- Each round of consultation will allow for further feedback and identification of concerns, providing stakeholder input to the each of the KKIP components.

**Stakeholders and participants.** Stakeholders will be invited to participate in specific engagement activities suitable to their being primary or secondary stakeholders and to which subgroup of stakeholders they belong.

- Primary stakeholders will receive and participate in the most intense and frequent engagement activities because they are directly involved in some way in aspects of the KKIP delivery.
- Island community members will also include vulnerable and minority groups in the community such as women, youth, elderly, and persons living with disabilities. For all community level consultations, meetings will include the heads of the communities/villages. Others in attendance could be island-level staff of relevant government ministries or offices.
- Secondary stakeholders, interested in the project may have some information or concerns to contribute that can be factored into the design assessment and decision-making process.

**Stakeholder feedback and disclosure.** After the meetings, the PCU Manager and community/village leaders can act as intermediaries to brief and disseminate the project information to the other staff as relevant and to communities, respectively, and come back within a specified period with any feedback or issues raised.

- Project team and stakeholders to discuss, understand and agree the best process for provision and incorporation of, feedback by (i) GOK stakeholders; (ii) island community members; and (iii) secondary stakeholders KKIP information will be disclosed in English with summaries available in i-Kiribati. at key times and milestones. Information to be disclosed includes: project information brochures/flyers, this as well as the updated version of the SEP, the GM procedures, labor management procedure, draft and final feasibility studies and technical reports, draft and final ESMPs, draft, and final land due diligence reports.
- Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the SEP and GRM, and on the overall design and implementation progress of the KKIP.

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<sup>11</sup> Disclosure and consultation requirements are part of the environmental license application and land access procedures.



The SEP is provided in Table 4.1. This will be updated by the PCU, supported by the DSC, early in KKIP implementation and on an as needs basis to ensure it remains fit for purpose and reflects the current KIDP implementation schedule for activities and processes.

**Table 4.1: Stakeholder engagement plan**

| Project activity  | Consultation/message or activity  | Timeframe                                     | Objective  | Stakeholders and participants      | Responsibility                                   | Methods used and medium  |
|---|---|---|--|------------------------------------|--|--|
| <p>Feasibility, assessments, technical studies, design</p> <p>Design of GM to be culturally appropriate and accessible to affected Indigenous Peoples (IP)</p> <p>Stakeholder analysis and engagement planning, disclosure of information, and meaningful consultation, in a culturally appropriate and gender inclusive manner</p> | Awareness raising about the KKIP, process, timeframe, type and timing of engagement activities, key deliverables  | During early stages of project implementation | To bring stakeholders into the decision making around the site and design of investments.  | Primary and secondary stakeholders | PCU + DSC  | Meetings, focus group discussions, news articles (radio, TV and newspaper), social media posts |
|   | Process for due diligence and preparation of E&S instruments  |   | To describe SEP process and requirements   | PAP and sensitive receptors        | PCU + DSC (and WBG as required for ESS7 matters) | Meetings, focus group discussions, news articles (radio, TV and newspaper), social media posts |
|   | Engagement on land access, impacts and requirements   |   | To explain applicability of ESS7 when IP are the sole, or the overwhelming majority of, project beneficiaries, and the elements of IP plan to be included in overall project design, and that preparation of a stand-alone IP plan is not necessary for KKIP | PAP and sensitive receptors        | MELAD-LMD  | Key informant interviews   |
|   | Disclose known project risks, impacts and management measures, and scope, in a participatory way potential risks and impacts and mitigation measures for the project. |   | To discuss potential impacts and mitigation measures   | Primary and secondary stakeholders | PCU + DSC  | Disclosure of documents and advice as to where documents may be viewed                         |
|   | Identify key sensitive community assets and activities to be considered in the design. Identify potential supplementary community benefits of the project.            |   |  | Primary and secondary stakeholders | DSC  | Disclosure of documents and advice as to where documents may be viewed                         |

| Project activity                                       | Consultation/message or activity  | Timeframe  | Objective  | Stakeholders and participants  | Responsibility   | Methods used and medium   |
|--|---|--|--|--|--|---|
| Disclosure of E&S instruments                          | Public awareness and consultation meeting(s) to present and receive information for development of the ESMPs and land due diligence and comments on draft documents | Prior to and during environmental license application and review | To advise stakeholders of updates of E&S instruments;<br>To advise PAP of risks of GBV risks, and spread of communicable diseases and prevention strategies and management of labor influx | Primary and secondary stakeholders   | PCU + DSC  | Notices, text blasts and social media invitations to meetings, Public meetings  |
|  | Public meetings for environmental license applications and issue  |  | To advise stakeholders of updates of E&S instruments, environmental license application and meetings public procedure  | Primary and secondary stakeholders (incl. MLPID and MICT as implementation agencies) | MELAD-ECD (for meetings specific to environmental license process) | Notices about public meetings, public meetings  |
| Detailed design, update of E&S instruments             | Finalization of project E&S documents and instruments following GOK review and public disclosure  | Prior to civil works tendering                                   | To advise stakeholders of final design, impacts and updates of E&S instruments   | PCU + DSC  | PCU + DSC  | Notices about where updated documents may be accessed   |
| Establishment of project-specific GM and SEP processes | Socialization of the SEP and E&S instruments and requirements   | Immediately upon approval and start of KKIP implementation       | To advise stakeholders of GM and SEP processes and opportunities for public engagement incl. grievance redress committees  | Directly affected communities, households and people, MELAD-ECD and LMD              | PCU + DSC, contractor(s)   | Meetings, focus   |
| Establishment of ESM system                            | Construction ESMP including GRM, SEP activities and timeframe prepared by contractor(s) and reviewed and cleared by PCU and WBG, provided to ECD for information    | Upon award of civil works contract(s)                            | To advise stakeholders of the contractor(s) and forthcoming CESMP, construction start date and general activities etc  | Directly affected communities, households and people, MELAD-ECD and LMD              | PCU + DSC Contractor(s)  | Meetings, focus group discussions, news articles (radio, TV and newspaper), social media posts, negotiations, due diligence process |
|  | Implementation of approved CESMP incl. regular updates to communities   | Upon commencement of construction works and activities           | To advise communities of activities which may affect them (traffic management and detours, materials haulage, noisy activities etc)  | Directly affected communities, households  | Contractor(s)  | As applicable or required: text blasts, news articles (radio, TV and newspaper), social media posts                                 |

| Project activity                       | Consultation/message or activity   | Timeframe   | Objective  | Stakeholders and participants      | Responsibility                                  | Methods used and medium  |
|--|--|---|--|------------------------------------|---|--|
| Construction, monitoring and reporting | Completion of remaining baselines (prior to commencement of construction)  | Immediately prior to construction activities commencing | To complete any baselines (noise etc) as identified in the ESMPs or required by ECD in environmental license   | Sensitive receptors                | DSC, contractor(s)                              | Field visits and small group consultations, individual meetings as necessary       |
|  | Contractor-led meetings and consultations for any due diligence required for site-specific ESMP development and environmental license and/or permits application(s)                                  | Throughout construction activities                      | To keep communities and stakeholders informed about meetings schedule (as per SEP), access to GRM, construction activities, risks and mitigations (incl. materials sources, restricted access to work sites and worker accommodation, haulage routes, pedestrian safety etc) | PAP, sensitive receptors, MELAD    | Contractor(s)                                   | Meetings, interviews, discussions  |
|  | Functioning of the GM and SEP (incl. activities led by contractors)  |   |  | PAP, sensitive receptors, MELAD    |   |  |
|  | Scheduling of PSC meetings and/or need for establishment of grievance redress committees   |   | To support effective implementation of the SEP and GRM   | PSC, PAP                           | PCU, DSC contractors, community representatives | Meetings, focus group discussions,   |
|  | Monitoring of project performance, CESMP implementation, compliance with environmental license conditions and reporting  |   | To provide stakeholders with updates on project progress and performance   | Primary and secondary stakeholders | PCU + DSC                                       | Notices , news articles (radio, TV and newspaper), social media posts              |
|  | Notices about specific construction activities and required management measures incl. road closure or diversions, materials extraction, materials haulage, temporary changes to flight schedules etc |   | To advise communities of timing of activities which may affect them  | Directly affected communities      | Contractors                                     | Notices , text blasts, news articles (radio, TV and newspaper), social media posts |

| Project activity          | Consultation/message or activity  | Timeframe                               | Objective                                      | Stakeholders and participants                            | Responsibility                                 | Methods used and medium   |
|---------------------------|---|---|--|--|--|---|
| Operation and maintenance | Avenues and process for community inputs to O&M stage monitoring and reporting    | During operations and maintenance (O&M) | To keep communities and beneficiaries informed | Sensitive receptors, community groups, local contractors | MLPID, MICT (in-house or outsourced resources) | Notices , news articles (radio, TV and newspaper), social media posts, focus group meetings as required |
|                           | Information on any changes to project-specific GM and SEP processes for O&M stage |   |  |  |  |   |

## 4.2 Risks and Mitigations Associated with Stakeholder Engagement

Encouraging local participation in the engagement activities will increase awareness about the KKIP, build capacity, improve understanding of processes and create ownership of key elements of island development. However, providing information about developments can also create risks. Some of the potential risks and issues relating to the SEP are described in Table 4.2.

**Table 4.2: Risks and mitigations associated with the project's SEP**

| Risk   | Mitigation measures  | Responsibilities  |
|--|--|---|
| Project delays   | Ensure schedules and programs developed for the project during preparation and implementation have flexibility for updates as required<br>Set realistic timeframes, implementation schedules and reviewing schedules regularly                         | WBG, MFED, MLPID, MICT, KDU, PCU  |
| Information capture  | Consultation plan establishment and functioning<br>Ensure not only KKIP is widely socialized but engagement processes, access to GM also widely socialized<br>Clear communication of key channels for provision of information and receipt of feedback | KDU, PCU, WBG, MFED, MLPID, MICT, PCU, Island Council, village leaders, community groups, CSO/NGO |
| Raising high expectations of stakeholders  | Ensuring that adequate data and information presented during consultation meetings to control stakeholder expectations, especially with regards to financing arrangements.<br>Ensure stakeholders are aware of the GRM                                 | WBG, MFED, KDU, MLPID, MICT, PCU, Island Council, village leaders, community groups, CSO/NGO      |
| Reliability of information and data gathering used to develop the land due diligence reports and the ESMPs | Clear communication on what data is required.<br>Use materials in format and language appropriate for stakeholder groups<br>Validation workshops   | KDU, PCU, DSC   |
| Commercial reality –driven by cost, influences KKIP delivery   | Clear and concise communication with regards to KKIP components, delivery of the components, timeframe, and responsibilities for implementation  | WBG, MFED, MLPID, MICT, PCU   |
| Political constraints  | Processes to remain apolitical and ensure that the institutional arrangements are reviewed and updated as required and implemented throughout delivery of the KKIP.  | WBG, MFED, MLPID, MICT, KDU, PCU  |
| Lack of/unsuitable consultation leading to lack of support for project                                     | Clear communication about the extent and type of engagement and rationale.   | WBG, MLPID, KDU, PCU, DSC   |

Early in KKIP implementation, MLPID and MICT (through the PCU supported by the DSC) will update the SEP to identify/confirm existing stakeholders, describe the process for sharing information on KKIP activities (including coordinating and aligning with the specific engagement processes to be undertaken for the development and implementation of the contractors' CESMPs etc and any further environmental license and/or permit applications the contractor(s) need to make), and seeking/incorporating feedback on design of the GRM.

## 5. Grievance Mechanism

### 5.1 Purpose of the Mechanism

The objective of the GM is to systematically address grievances that may arise through, or as a result of, development activities for the island, in order to maximise implementation effectiveness while reducing negative ramifications to the widest group of stakeholders. It does so by providing a forum for stakeholders who have concerns about the overall process, specific elements of the program, or who perceive that they will be affected in some way, to report those grievances or concerns and seek satisfactory resolution, without fear of intimidation or retribution.

The main objective of a GM is to assist to resolve complaints and grievances in a timely, effective, transparent and efficient manner that satisfies all parties involved. The following are additional objectives:

- To address complaints and enhance conflict resolution arising from, and during program implementation.
- To provide transparency and accountability throughout the implementation of components/activities amongst the relevant stakeholders
- To resolve any emerging environmental and social complaints/issues, and
- To promote good relations between the program implementing agencies, stakeholder agencies and the island community.

A GM is a locally based, formalised way to accept, assess and resolve community feedback or complaints. The GM provides important feedback for the continued improvement of projects. The GM is a process for receiving, evaluating and addressing project-related complaints from communities at the level of project component or activity. The terms complaints<sup>12</sup> and grievances<sup>13</sup> are used interchangeably.

A GM is necessary during program implementation, in order to address stakeholder concerns, conflicts, complaints or grievances relating to the program, and these need to be resolved in a fair and transparent manner to reduce exposure to risks. The GM is also necessary to promote a harmonious relationship between MLPID, MICT, stakeholders and community members in order to enhance their acceptance of the project.

Potential conflicts can be avoided through a consultative and participatory planning process involving the identified stakeholders and with clear avenues for input and participation at key times. If stakeholders are well engaged and informed, it can reduce the occurrence of disagreements and conflicting positions. However, where grievances do occur, it is important that there is a process in place to have them resolved quickly before positions strengthen and disagreements escalate.

A GM is established with clear processes for use and reporting, that the stakeholders and community members are aware of and understands what the GM represents and that those managing the GM understand their role and responsibility when processing and responding to feedback received.

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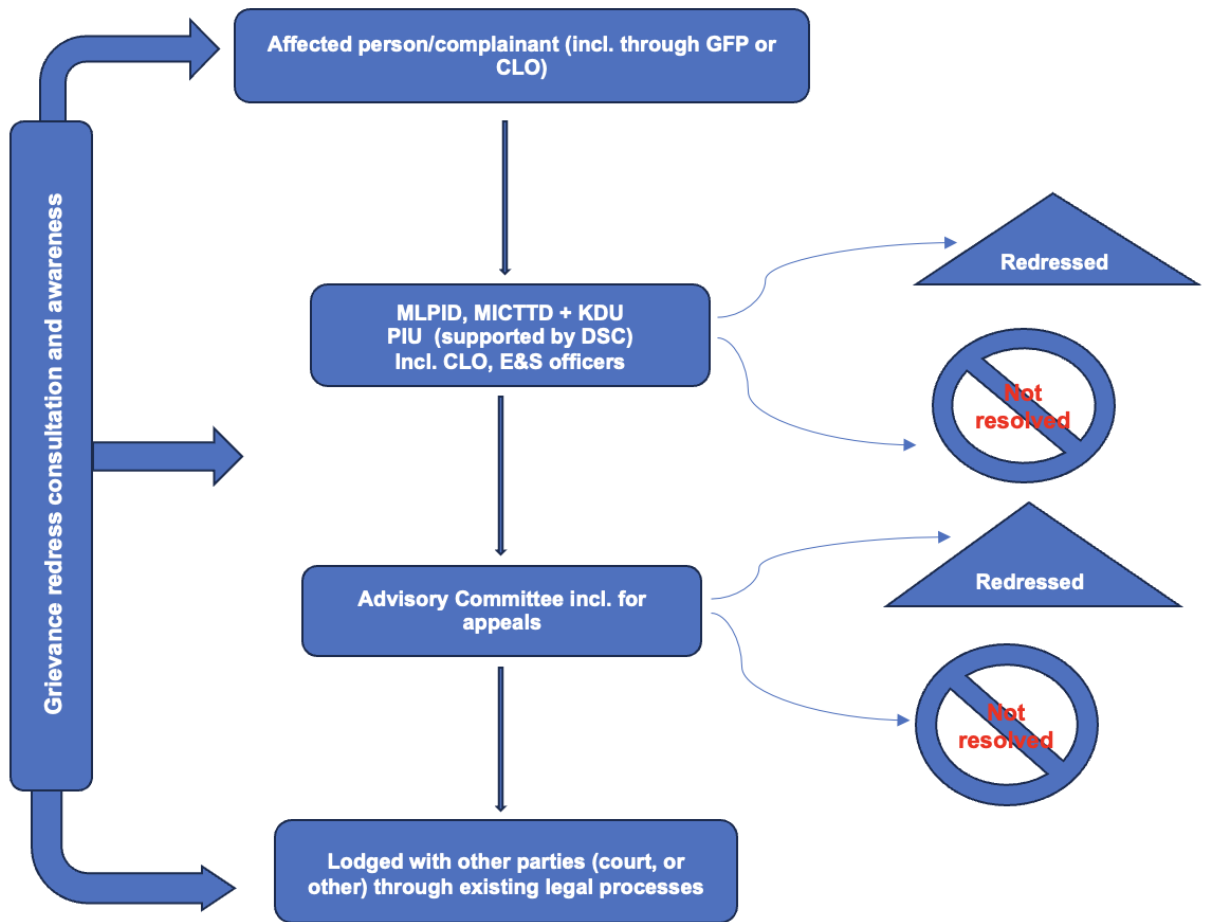
<sup>12</sup> **Complaint:** an expression of dissatisfaction that is related to the objective, process or implementation of the program, and which is perceived to affect an individual or group. A complaint is usually of a less serious nature than a grievance

<sup>13</sup> **Grievance:** a claim raised by an individual or group whose livelihood, health and safety, cultural norms and heritage are considered to have been adversely affected (harmed) by an activity which, if not addressed effectively, may pose a risk to the KKIP implementation.

The GM does not impede access to other judicial or administrative processes.

Figure 5.1 shows the process for the GRM.

**Figure 5.1: Simplified flow chart of the grievance redress mechanism**



## 5.2 Process for the GRM

The grievance procedure generally consists of four key steps including: (i) lodgement and documentation of a grievance including recording, categorizing, and prioritizing; (ii) consultation for hearing information relevant to the complaint, investigation process (as required, and resolving the grievances in consultation with the complainant(s) and other stakeholders; (iii) informing the aggrieved parties about the outcome, and, (iv) provisions for appeal to higher authorities (including the court system) in the event of continued dissatisfaction by the complainant.

Language barriers and insufficient literacy levels shall not withhold any person from lodging a complaint. The GM form (see Annex B) shall be available in i-Kiribati and English as appropriate and disclosed to all stakeholders early in the KKIP implementation. The forms will be available at the offices of MLPID, PCU and MELAD-ECD's Wildlife Conservation Unit on Kiritimati.



The PCU and DSC staff will assist those with verbal grievances to complete the form.

Grievances raised by stakeholders need to be managed through a transparent process, readily acceptable to all stakeholders, at no cost and without retribution. The GM needs to be fit for purpose, i.e. appropriate to the scale of impacts and risks presented by the program

This GM sets out a number of 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:

- Perceived or actual negative risks or impacts on the environment and/or community from the KKIP (land and/or resource access, noise, dust, pollution, waste, accidental spills, royalty payments for use of resources etc)
- Inclusion and participation
- Wellbeing, livelihood or employment, or access to land and resource risks
- Unacceptable behaviour by staff or employees of the MLPID, MICT, PCU
- Unacceptable behaviour by staff or employees of the contractors, and
- Negative impacts on communities, which may include, but not limited to financial loss, physical harm and/or nuisance from construction or operational activities of subsequent projects.

The purpose of the GM is to address and record any complaints that may arise during the implementation of the project. The GM works within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level. The key elements of the GM are:

- Receive the grievances, and provide feedback and comments to improve design
- Record, categorize and, as necessary, prioritize the grievance
- Settle the grievances via consultation with all stakeholders and through investigation as required (and inform those stakeholders of the solutions),and
- Forward any unresolved cases to the relevant authority or support the complainant access the court or judicial system if they are not satisfied at the end of the GM process.

The following timelines for acknowledgment, interim responses, and, where possible, final resolution of grievances. are indicative and should be confirmed through consultation with stakeholders early in implementation of the KKIP. The PCU will be responsible for updating the GM as required and disclosing information about the GM process. The GM procedure, explained below, will guide the resolution of grievances.

**Receive and acknowledge grievance.** At the start of KKIP implementation, the PCU will publicize the availability and access procedures for the GM as part of wider KSDP awareness activities. This initial awareness raising will include provision of information to relevant government stakeholders, regulatory authorities, Island Council and island residents and businesses entities who will be made aware of the GM process and be given guidance on relevant steps to lodge a complaint.

**Contact details for lodging a complaint.** Specific contact details and information will be provided to all stakeholders early in KKIP commencement. This will allow them to request further information about the program, and to lodge a complaint or raise a concern or grievance. A grievance may be lodged in a number of ways: (i) directly with PCU as per the contact details of the focal person designated and that information provided on information brochures and signboards etc; and (ii) through a government office, NGO; or (iii) directly to the WBG as financier of the program.

Once the complaint is registered, the complainant will be given a SR number to enable the complainant to follow up their complaint, and for all information and subsequent communications to be logged against this number

Grievance forms (Annex B) shall be provided where required, and the GM shall be discussed in any community consultation sessions. Language barriers and insufficient literacy levels shall not withhold any person from lodging a complaint. The grievance form shall be written and available in i-Kiribati and English, as appropriate, and disclosed to all stakeholders early in the KKIP implementation. The PCU staff can assist those with a verbal grievance to complete the form.

**Maintaining a grievance register.** Each grievance shall be recorded in a grievance register. The format for the grievance register can be as shown in Table 5.1 and elaborated in Annex C.

**Table 5.1: GM grievance register**

| No. | Date | Name of complainant | Details of grievance | SR Ref # | Responsible officer | Action taken | Grievance status (closed / pending and close-out date) |
|-----|------|---------------------|----------------------|----------|---------------------|--------------|--|
| 1   |      |                     |                      |          |                     |              |  |
| 2   |      |                     |                      |          |                     |              |  |

**Acknowledgement of grievance.** Outcomes of the investigation, and proposed resolution will be discussed with the complainant. The response can be communicated in several ways depending on the complainants preference (e.g. face to-face, email, letter, phone call, etc.). This communication shall also serve as an acknowledgement of the grievance. If the grievance is assessed to be outside of the subproject scope, the complainant will be advised and an alternative mode of redress shall be suggested. A standard letter for acknowledging a grievance is attached as Annex D.

**Assess grievance and assign category and responsibility.** If it is decided that a grievance is not valid, the grievance will be dismissed and advice of the decision and the reasons for dismissal will be provided to the complainant in writing (and in person if required). If the grievance is valid, it will be classified in to one of the following categories:

- For level 1 grievances, the PCU E&S officer or grievance focal will contact the complainant directly to develop solutions with oversight from the PCU manager
- For a level 2 grievance, the PCU E&S officer or grievance focal will be responsible for identifying a coordinated management solution and response with the PCU and/or KDU, MLPID or MICT (whichever ministry is responsible for the component for which a grievance is being lodged). This should involve other senior managers and sign off from the KDU and PCU managers, and
- For a level 3 grievance, immediate intervention of related parties such as senior managers, and/or local authorities via the advisory committee, as required, to seek their advice on potential resolutions. Level 3 grievances require the response to be signed-off by the KDU and PCU managers and the CPIU E&S officer or grievance focal. Sensitive grievances (see Section 5.3) will be acknowledged and may need to be handed over to a specialist, at which stage the PCU will only be kept informed of the status, rather than any detail, of the complaint.

**Investigate and propose resolution.** Initial investigation of the grievance and proposal of a resolution will be undertaken as soon as possible but no later than two weeks after screening and assessing the grievance. The designated officer will discuss the outcomes of the investigation, and proposed resolution with the complainant. The response can be communicated in several ways depending on the complainants preference (e.g. face to-face, email, letter, phone call, etc.). Further investigations can be undertaken at subsequent resolution levels if required.

The complainant will be asked for written acceptance of the resolution (or verbal if the complainant has difficult reading/writing).

**Resolution, escalation, and closure.** Once a resolution is reached and complainant is satisfied the grievance case is recorded as a closed case. If the complainant is not satisfied or the relevant personnel cannot resolve grievance then that grievance case is escalated. The resolution levels comprise a sequential process of four levels of resolution. The next level of resolution is triggered if the complaint cannot be resolved at a lower level.

- Resolution level 1: this level is where complaints can be resolved via fairly easy or immediate corrective action by PCU E&S officer or grievance focal
- Resolution level 2: if the complainant is not satisfied with the resolution proposed by the PCU E&S officer or grievance focal, then the KDU, MLPID or MICT (whichever ministry is responsible for the component for which a grievance is being lodged) will be involved to support collective resolution. KKIP progress meetings is an avenue for resolution
- Resolution level 3: If the complainant does not accept the resolution or decision at level 2, they can appeal to the advisory committee, and
- Resolution level 4: If the complainant is not satisfied with the resolution proposed by the advisory committee, the complainant can appeal to the ombudsman and/or court according to the judicial process. MLPID or MICT does not control the process beyond this level of resolution but acknowledges this.

**Advisory committee.** If a complaint is escalated to level 3, then MLPID and/or MICT will convene a meeting with the advisory committee, including members of the complainant's community, relevant government institutions (depending on the nature of the complaint) and MLPID, MICT, KDU, PCU and any other ministry of GOK office which may be relevant to the nature of the grievance, to identify an adequate resolution for the grievance.

The GM proposed for the KKIP is based on the GM implemented successfully on other WBG-financed projects in Kiribati.

The GM for the project is set out in Table 5.3.

**Table 5.2: GM proposed for the KKIP**

| Step                                      | Process  | Duration /timeframe        | Responsibility   |
|---|--|----------------------------|--|
| GRM implementation                        | MLPDP, MICT and PCU will have primary responsibility for the project level GRM   | At start of implementation | MLPID, MICT, PCU   |
| Grievance uptake                          | The complainant can take their grievance directly to the PCU E&S officer or grievance focal who will endeavor to resolve it immediately. If not satisfied with this solution, the PCU E&S officer or grievance focal will request them to register a formal grievance by using a complaints form (Appendix A).   | Anytime                    | KDU, PCU E&S officer or grievance focal                    |
| Sorting, processing                       | Depending on the nature of the grievance the PCU E&S officer or grievance focal will elevate as per the resolution levels and who needs to be involved.  |                            |  |
| Verification, investigation, action       | For complaints satisfactorily resolved, the PCU E&S officer or grievance focal, the register will be updated with the actions that were taken.   |                            |  |
| Acknowledgment and follow-up              | On receipt of a formal complaint, the PCU manager will respond (standard letter Appendix C) and endeavor to resolve it within 2 weeks of receiving the complaint.  | Within 2 weeks             | PCU manager  |
| Escalation, Further investigation, action | If the matter cannot be resolved by PIU, the MLPID and MICT will become involved. The complainant must be notified that as a result of failure to resolve to the complainant's satisfaction, the matter will be elevated to KDU, MLPID and MICT level and will take another two weeks for investigation and solutions or recommendations. MELAD will be informed (and involved) If the matter is a land or serious environmental issue | Within 2 weeks             | KDU, PIU E&S officer or grievance focal, MELAD as required |
| Escalation, Further investigation, action | If the complainant is still not satisfied, MLPID and MICT will refer to matter to the advisory committee for a resolution. The advisory committee, KDU and PCU managers and E&S officer will develop options to resolve the issue. The complainant must be notified that as a result of escalation to the advisory committee a solution will be proposed within 1 month  | Within 1 month             | Advisory committee, KDU, PCU                               |
| Last resort                               | If the complainant is dissatisfied with the outcome proposed by the advisory committee, he/she is free to refer the matter to the Ombudsman's Office   | Anytime                    | Ombudsman  |
|   | If the issue remains unresolved through the Ombudsman's decision, then the complainant can take the matter to the court/legal system to deliberate. Any such decisions are final.  | Anytime                    | Court/legal system   |

The GM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

The WBG and the GOK do not tolerate reprisals and retaliation against project stakeholders who share their views about WBG financed projects.

### 5.3 Confidentiality and Grievance Redress for Sensitive Issues

Complaints may be made anonymously and confidentiality with the details of complainants being kept confidential in all instances, including when the person making the complaint is known. Complaints may be lodged through a third party on behalf of a victim/survivor. For this reason, multiple channels (email, phone, web based etc) to make a complaint will be established and conflicts of interest avoided. Specific procedures for gender based violence (GBV), violence against children (VAC) and/or sexual exploitation, harassment (SEAH) including confidential reporting with safe and ethical documentation of GBV, VAC or SEAH cases will be undertaken through Kiribati Police Service and Kiribati Women and Children's Support Centre.

If such a complaint is received through the program GRM, the complainant will be referred to a specialist service provider (Kiribati Women and Children's Support Centre) considering the need for confidentiality and a survivor-centred approach. For more information, please refer to the WBG Environment and Social Incident Response Toolkit guidelines.

These cases will be directed to the police, as may be the result of criminal behaviour, and the appropriate local support agency, without following the outlined steps of standard grievance resolution. While the grievance/complaint will be lodged in the GM and SEP registers, **all correspondence related to the grievance must be kept confidential** and handled only by the person(s) designated as the focal(s) for the complaint. The GM and SEP register/database will reference the separate process for resolution and will only identify the responsible party for handling the complaint, for monitoring, reporting and learning purposes.

The WBG will also be informed at lodgement of the grievance or complaint and will determine the process for handling the matter according to their guidelines<sup>14</sup>, requirements and accepted practice i.e. who the responsible parties within each institution will be, outline of the information to be reported to management<sup>15</sup>, whether an investigation is required and specialist investigators need to be recruited, reporting procedures, coordination with the police etc, and when the matter is closed.

### 5.4 Disclosure of the GRM

The PCU will ensure that stakeholders are made aware of the GM established for the KKIP, how to get and provide information, who the grievance focal points or community liaison officers (CLO) are, how to make suggestions and raise concerns. This will be done in accordance with the SEP, throughout the program design and implementation phases through various methods including noted on project signboards, public notices in newspapers and on radio, cell phone text blasts, stakeholder / community meetings, questionnaires, and during data gathering.

The GM will be disclosed and socialized during program awareness and consultation meetings early in program implementation. A copy of the procedure for the GM will be available to the stakeholders. Both successfully addressed complaints and non-responsive issues will be recorded by the PCU and communicated to the MFED, MLPID, MCITTD and WBG in quarterly progress reports and safeguards monitoring reports.

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<sup>14</sup> WBG. 2022. *ESF Good Practice Note: Addressing SEAH in Project Investment Financing involving Human Major Civil Works*. Washington D.C, Unites States.

<sup>15</sup> This is only to report that a SEAH, GBV or VAC related complaint has been received, the number, sex and age of people involved [alleged perpetrator(s) and victim(s)], and an outline of the process to resolve the matter, including whether an investigation is to be undertaken, it does not reveal any of the detailed nature of the complaint itself.

## 6. Monitoring and Reporting

### 6.1 SEP Monitoring and Reporting

Monitoring and reporting will be undertaken as a part of overall KKIP implementation. Specific key indicators for the SEP and GM can be incorporated into the program operations manual which will include how stakeholders can provide feedback.

Activities related to the SEP should be reported in the E&S section of the normal reporting cycle for the KKIP as determined in the Program Operations Manual. Key indicators for the SEP will also be incorporated into the project's M&E framework as appropriate. Monitoring and results of SEP implementation will be reported by the PCU to the MFED, MLPID, MCITTD and WBG in regular progress reports and E&S monitoring reports. The KDU will be kept informed.

The monitoring plan for the project's SEP is provided in Annex E.

### 6.2 Reporting Back to Stakeholder Groups

The SEP will be periodically revised and updated as necessary in the course of program implementation. Regular summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by PCU E&S officers (or designated focal points) and referred to the PCU management.

The regular summaries will provide a mechanism for assessing both the number and nature of SEP activities, complaints and requests for information, along with the ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the program during the year may be conveyed to the stakeholders in various ways including through disclosure of reports and in subsequent meetings.

The monitoring reports will be disclosed on the GOK and WBG websites.

## 7. Responsibilities and Resources

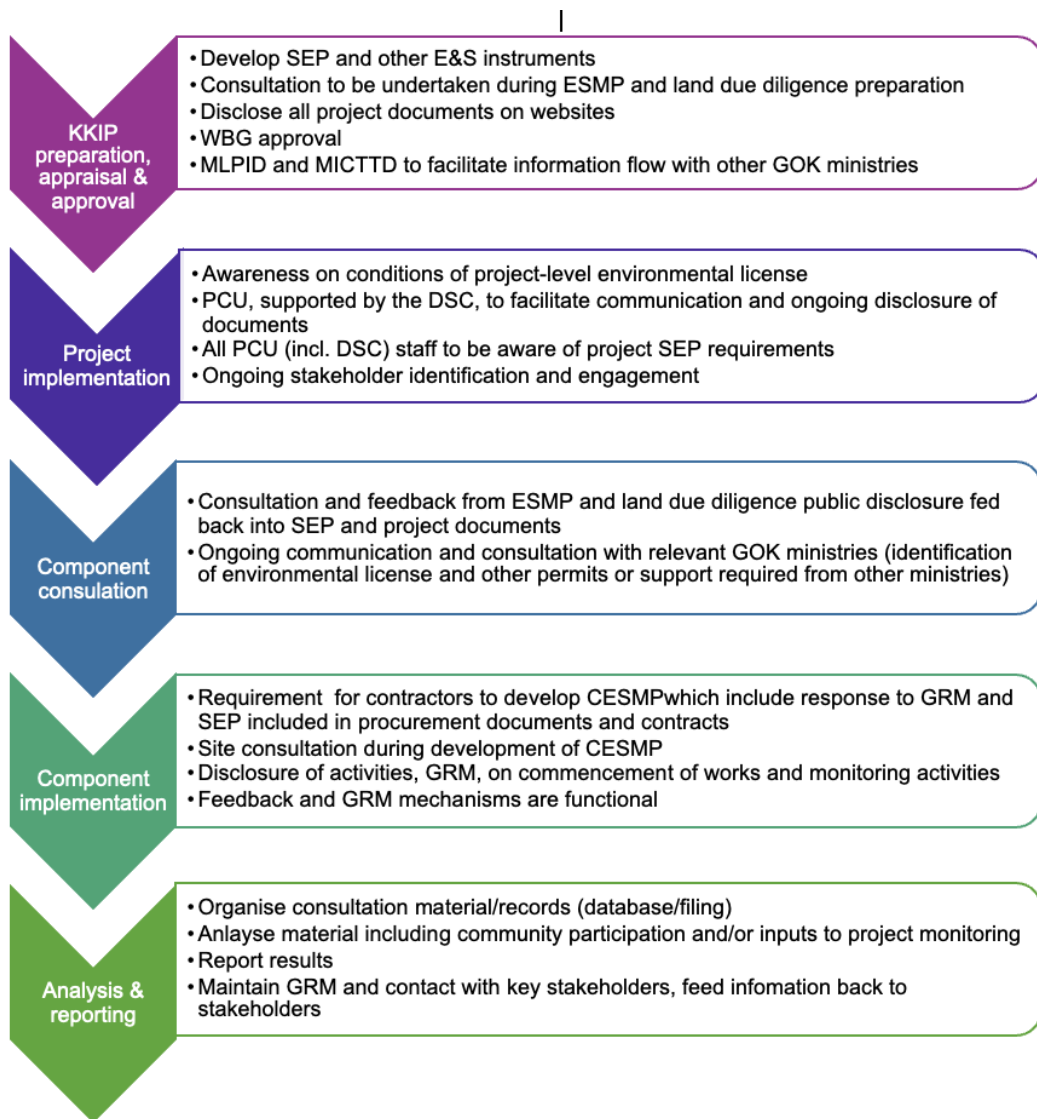
### 7.1 Risk Management Functions and Responsibilities

The roles and responsibilities for overall E&S risk management and implementation of the SEP for the KKIP are outlined in Table 7.1 and the key steps for SEP implementation are shown in Figure 7.1.

**Table 7.1: -Roles and responsibilities for environmental and social risk management**

| Responsibility     | Role   |
|--------------------|--|
| MLPID and MICT     | <ul style="list-style-type: none"> <li>• Prepare and release to market (after WBG review) bid and contract documents for required consulting services (DSC and any other)</li> <li>• Ensure that the PCU (including the DSC) is fully staffed and functional during the entire period of program implementation</li> <li>• Recruit, administer and supervise management and technical consultants as required to assist the PCU deliver the KKIP</li> <li>• Maintain website to facilitate disclosure of program information</li> </ul>  |
| KDU                | <ul style="list-style-type: none"> <li>• Provide general support to the PCU</li> <li>• Assist in implementation of the SEP and GM for the KKIP</li> <li>• Liaise and coordinate with MLPID, MICT and the PSC as required</li> </ul>  |
| PCU                | <ul style="list-style-type: none"> <li>• Ensure implementation of the KKIP environmental and social commitment plan</li> <li>• Preparation, updating and submission of E&amp;S instruments and due diligence reports and documents, to MFED, MELAD, MICT and WBG for review and clearance</li> <li>• Provide day-to-day support for KKIP preparation and implementation activities</li> <li>• Prepare and release to market (after WBG review) bid and contract documents for the civil works packages for components 1 (airport) and 2 (road)</li> <li>• Provide information to MLPID and MICT for disclosure</li> <li>• Maintain the overall GM registry/record sheet and summarize for inclusion in reports and disclosure</li> <li>• Submit periodic reports, including quarterly progress reports, safeguards monitoring reports, to MFED, MLPID, MICT and WBG</li> <li>• Overall program (incl. SEP, GM etc) monitoring and reporting and disclosure of reports</li> </ul> |
| WBG (as financier) | <ul style="list-style-type: none"> <li>• Review and clear documentation incl. E&amp;S instruments prepared post appraisal</li> <li>• Review program status and progress through quarterly progress reports</li> <li>• Provide clearances (no objection) and disclosure, as required, of reports/documents, bid documents and bid evaluation reports, contract awards, monitoring reports</li> <li>• Provide support and assistance to PCU as required</li> <li>• Undertake regular project review missions</li> </ul>  |

**Figure 7.1: Implementation steps for the SEP**



## 7.2 Resources

The PCU, supported by the DSC, established for the KKIP, will be in charge of stakeholder engagement activities.

The budget for the SEP is estimated at just over \$ \$315,000 and covers both of the components (airport and road upgrading) of the KKIP.



**Table 7.2: Estimated SEP implementation budget**

| Budget item   | Unit                | Unit cost US\$        | No. | Total cost US\$  | Remarks                            |
|---|---------------------|-----------------------|-----|------------------|------------------------------------|
| <b>1. Estimated PCU staff salaries and related expenses</b> |                     |                       |     |                  |                                    |
| 1a. Communications consultant                               | Mth                 | 32,000                | 1   | 32,000           | International, intermittent inputs |
| 1b. Community liaison off./grievance focal                  | Mth                 | 4,000                 | 60  | 192,000          | National (salary x 1)              |
| 1c. Travel costs for staff                                  | Flights & per diems | 2,000 & \$200 per day | 4   | 10,200           | TRW-CXI round trip                 |
| 1d. Suggestion boxes @ MLPID + PIU                          | Each                | 10                    | 2   | 20               |                                    |
| <b>2. Events</b>  |                     |                       |     |                  |                                    |
| 2a. Focus groups & meetings                                 | Per                 | 1,500                 | 10  | 30,000           | Venue hire and refreshments        |
| 2a. Organization of workshops                               | Per                 | 3,500                 | 4   | 14,000           | If required                        |
| <b>3. Communication campaigns</b>                           |                     |                       |     |                  |                                    |
| 3a. KKIP info brochures, posters, flyers                    | LS                  | 5,000                 | 2   | 10,000           | Program info brochures, flyers     |
| 3b. Social media campaign                                   | LS                  | 1,500                 | 2   | 3,000            | Engage nat. social influencer      |
| <b>4. Grievance Mechanism</b>                               |                     |                       |     |                  |                                    |
| 4a. Training - advisory committee members                   | LS                  | 1,500                 | 4   | 6,000            | Venue hire and refreshments        |
| 4b. GM + suggestion boxes in villages                       | Each                | 10                    | 4   | 40               | One box for both components        |
| 4c. Communication materials                                 | LS                  | 5,000                 | 2   | 10,000           | GRM info brochures, flyers etc     |
| 4d. GM forms (printing)                                     | Per                 | 3                     | 6   | 18               | Ream A4 paper year/component       |
| <b>6. Other expenses</b>                                    |                     |                       |     |                  |                                    |
| 6a. Miscellaneous + contingency                             | PS                  |                       |     | 10,000           |                                    |
| <b>Total stakeholder engagement budget</b>                  |                     |                       |     | <b>\$315,878</b> |                                    |

# Annexes

## Annex A: Stakeholder Needs and Engagement

Different engagement methods are proposed to cover different stakeholder needs: public meetings, focus group meetings/discussions, community consultations, formal meetings, one-on-one and key informant interviews, and site visits. All KKIP documents, including this SEP and potential updates, will be disclosed on the GOK and the WBG websites to seek community feedback.

### A1.1 Process and stakeholders

**The process.** The engagement for the KKIP will be conducted at a number of levels; engagement with GOK stakeholders GOK (line ministries, authorities and SOE will focus on coordination for delivering the overall project, and engagement with communities, PAP, and beneficiaries will be focused on the airport and road upgrading components and will include several rounds of consultations.

The first round of consultation is to provide stakeholders with information about the KKIP and the ensuing E&S assessment and engagement processes. This engagement will raise awareness about the process of consultation (including socialization on the project's GRM) and information disclosure to feed into the proposed designs for the upgrades to the airport and to the section of the island's main road between the airport and London, the potential risks and impacts, and what is required to avoid and/or mitigate the adverse risks and impacts. This will enable primary stakeholders to provide feedback and information that can be integrated into, and help refine, the E&S assessments (ESMPs and land due diligence) ahead of feedback or input through the more formal review and approval process through the CESMF.<sup>16</sup>

Subsequent engagement will include public as well as more focused smaller (including one-on-one where necessary) consultations, to provide updates on project progress including status of various technical and due diligence investigations and assessments including compilation of further information and data gathered. Each round of consultation will allow for further feedback and identification of concerns, providing stakeholder input to the each of the KKIP components. During subsequent consultations the engagement team will describe how comments, concerns and issues raised during the earlier rounds of consultation have been taken into account in design and delivery of the KKIP.

**Stakeholders and participants.** Stakeholders will be invited to participate in specific engagement activities suitable to their being primary or secondary stakeholders and to which subgroup of stakeholders they belong. Primary stakeholders will receive and participate in the most intense and frequent engagement activities because they are directly involved in some way in aspects of the KKIP delivery.

Island community members will also include vulnerable and minority groups in the community such as women, youth, elderly, and persons living with disabilities. For all community level consultations, meetings will include the heads of the communities/villages. Others in attendance could be island-level staff of relevant government ministries or offices.

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<sup>16</sup> Disclosure and consultation requirements are part of the environmental license application and land access procedures.

Secondary stakeholders, interested in the project may have some information or concerns to contribute that can be factored into the design assessment and decision-making process.

These stakeholders will be engaged through various means including face-to-face methods but also virtual and online platforms given that a number of this group could be located outside of Kiribati (development partners) and/or Kiritimati Island (GOK staff and others who may be resident in South Tarawa).

Email invitations will be sent out to the government agencies and departments on the various meeting dates and venues. Community leaders and island council representatives will be contacted by telephone and email with the meeting details. A public notice will be advertised in the daily newspapers (including digital/online versions) and announced on the radio in i-Kiribati and English advertising the meeting dates and venues for the meetings. The same public notice will also be posted on the GOK Facebook page.

**Consultation venues.** Depending on the type of engagement and the stakeholders being reached, different venues for consultations will be required. For meetings venues can include government office meeting rooms and/or conference venues, community and village halls, churches, police stations, schools, island council meeting rooms.

The venues should be appropriate to the stakeholder participants and will need to be located in close proximity to the majority of participants to avoid travelling long distances and delays. If there is no other option for nearby venues, the PCU may consider providing transport. Participation in consultation activities should not place a financial burden on any participant.

## A1.2 Feedback and disclosure

**Stakeholder feedback.** After the meetings, the PCU Manager and community/village leaders can act as intermediaries to brief and disseminate the project information to the other staff as relevant and to communities, respectively, and come back within a specified period with any feedback or issues raised. The PCU and DSC will take notes of issues and concerns raised in meetings to be compiled in the project database and be reflected and responded to as required in the ESMPs and land due diligence (and other project reports).

An important element of the first consultations will be for the project team and stakeholders to discuss, understand and agree the best process for provision and incorporation of, feedback by (i) government stakeholders; (ii) island community members; and (iii) secondary stakeholders. At different stages of implementation, stakeholders can be given specified timeframes to submit their comments, concerns or queries to the PCU and or individual project team members. Any concerns or issues relayed to an individual project team member must also be recorded in the project database.

**Disclosure.** Information will be disclosed at key times and milestones. The following information will be subject to disclosure for the KKIP: project information brochures/flyers, this as well as the updated version of the SEP, the GM procedures, labor management procedure, draft and final feasibility studies and technical reports, draft and final ESMPs, draft, and final land due diligence reports.

The forms of disclosure will be through meetings and posting of documents, information and materials on GOK and WBG websites. Reports and documents will be shared via email with individuals representing secondary stakeholders such as development partner focal points. All reports will be in English with summaries available in i-Kiribati.

**Reporting back to stakeholders.** Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the SEP and GRM, and on the overall design and implementation progress of the KKIP.

Reporting back will be at a project level but can also be done for the KKIP components in case specific PAP or stakeholders are involved and/or interested in one component only.

The SEP will be updated by the PCU, supported by the DSC, early in KKIP implementation and on an as needs basis to ensure it remains fit for purpose and reflects the current KIDP implementation schedule for activities and processes.

## Annex B: Grievance Form

|   |   |   |  |  |
|---|---|---|--|--|
| <b>Name of Person Making the Complaint</b> <i>(information is optional and always treated as confidential)</i>          |   |   |  |  |
| <b>Address or contact information for Person Making the Complaint</b> <i>(information is optional and confidential)</i> |   |   |  |  |
| E-mail  |   |   |  |  |
| Phone   |   |   |  |  |
| Address   |   |   |  |  |
| <b>If applicable, location where complaint/problem occurred</b> <i>(write in)</i>                                       |   |   |  |  |
| <b>Category of Grievance:</b>   |   |   |  |  |
| <input type="checkbox"/> Environmental issues   | <input type="checkbox"/> Social issues including gender, labour, community health and safety (including traffic) and child safety | <input type="checkbox"/> Grievances regarding worker health and safety and behaviour of workers | <input type="checkbox"/> Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns | <input type="checkbox"/> Grievances regarding abuse of power/intervention by project or government officials |
| <input type="checkbox"/> Other (describe)   |   |   |  |  |

**Brief Description of Complaint** *(provide as much detail and facts as possible attach additional pages if required)*

Please include any other information that you consider relevant, other matters or facts, including supporting documents *(attach additional pages if required)*

Do you request that identity be kept confidential?  Yes  No

Have you previously raised your complaint with program management or others?

Yes *(if YES, please provide the following)*

- When, how and with whom the issues were raised
- Please describe any response received from and/or any actions taken by the PCU level grievance mechanism. Please also explain why the response or actions taken are not satisfactory

No *(if NO, why not?)*

| <b>Complaint Recipient</b><br><i>(If Authorized Representatives are not complainants themselves, their names will be disclosed as needed, in order to ensure transparency)</i> |                       |                |                |
|--|-----------------------|----------------|----------------|
| Name   | Position/Organization | Contact number | E-mail address |
|  |                       |                |                |

**Signature of the person making the complaint**

Signature

Date:

**Please send the complaint to**

Grievance Redress Mechanism

PIU *(insert appropriate Project and address)*

Email *(insert appropriate Project and address)*

Phone *(insert appropriate Project number)*

**Complaints may be submitted by, e-mail or hand delivery**





## Annex D: Template GM Lodgement Response Letter

### MINISTRY OF LINE AND PHOENIX ISLANDS DEVELOPMENT

Government of Kiribati

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**Reference No.:** Type reference number

**Date:** Type the date

Type recipient's name.,

Type recipient's title.,

Type recipient's address.

Type the salutation,

**Re:** *Your complaint received (insert SR or GR number) regarding (insert date and issue)*

Thank you for your *visit, letter, email, telephone call* of *insert date*. We welcome and appreciate all feedback regarding implementation of the Kiribati Kiritimati Infrastructure Project. Please be assured that we will investigate the issues you have raised and provide you a written response within two weeks. We may contact you during this period for additional information.

Until then if you require any further assistance do not hesitate in contacting *insert PCU E&S officer or grievance focal point name and contact details* who will be very happy to assist you.

Type closing,

---

Type your name

Kiribati Kiritimati Infrastructure Project

**PIU – Manager**

## Annex E: KKIP SEP Monitoring Plan

| Key evaluation questions   | Specific evaluation questions  | Potential indicators  | Data collection methods  |
|--|--|---|--|
| <p><b>GRM</b></p> <p>To what extent have stakeholders been provided with accessible and inclusive means to raise issues and grievances?</p> <p>Have the MLPID and MICT (through PIU) responded to and managed such grievances?</p>               | <ul style="list-style-type: none"> <li>• Are stakeholders raising issues and grievances?</li> <li>• How quickly/effectively are the grievances resolved?</li> <li>• Is resolution of grievances following the established procedure?</li> <li>• Were any grievances escalated to the advisory committee? If so, how many and how were these resolved?</li> <li>• How many grievances were raised by PAP complainants?</li> <li>• How many grievances were raised by secondary stakeholders or complainants not directly affected by the KKIP?</li> </ul> | <ul style="list-style-type: none"> <li>• Usage of GM and/or feedback mechanisms</li> <li>• Requests for information from relevant agencies.</li> <li>• Use of suggestion boxes placed in the villages/ and PCU office</li> <li>• Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified timeframe</li> <li>• Number of SEAH, GBV or VAC cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable)</li> <li>• Number of grievances that have been (i) lodged, (ii) open for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant</li> </ul> | <p>Records from the PCU (and other relevant agencies)</p> <p>Key informant interviews with PCU E&amp;S officer or grievance focal</p> <p>Key informant interviews with selected complainants</p> <p>Key informant interviews with advisory committee members</p> |
| <p><b>Stakeholder engagement impact on program design and implementation.</b></p> <p>How have engagement activities made a difference in development of the ESMPs and land due diligence instruments and overall implementation of the KKIP?</p> | <ul style="list-style-type: none"> <li>• Was there interest and support for the KKIP design?</li> <li>• Was there interest and support for the KKIP implementation?</li> <li>• Were there any adjustments made during KKIP design and implementation based on the feedback received?</li> </ul>  | <ul style="list-style-type: none"> <li>• Number of participants and acceptance of project</li> <li>• Active participation of stakeholders in activities</li> <li>• Number of actions taken in a timely manner in response to feedback received during consultation sessions with stakeholders</li> <li>• Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in KKIP design and implementation</li> <li>• Number of disaggregated engagement sessions held, focused on at-risk groups in implementation of the KKIP</li> </ul>   | <p>Stakeholder consultation attendance sheets and minutes</p> <p>Evaluation forms</p> <p>Structured surveys</p> <p>Social media/traditional media entries on the project results</p>   |

| Key evaluation questions   | Specific evaluation questions   | Potential indicators  | Data collection methods   |
|--|---|---|---|
| <p><b>Implementation effectiveness</b></p> <p>Were stakeholder engagement activities effective in KKIP implementation?</p> | <ul style="list-style-type: none"> <li>Was priority information disclosed to relevant parties throughout the KKIP life cycle?</li> <li>Were the activities implemented as planned? Why or why not?</li> <li>Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not?</li> <li>Which if any specific activities were modified during KKIP implementation and why?</li> </ul> | <ul style="list-style-type: none"> <li>Proportion of SEP activities implemented.</li> <li>Key barriers to participation identified with stakeholder representatives.</li> <li>Number of adjustments made in the stakeholder engagement approach to improve program' outreach, inclusion and effectiveness.</li> </ul> | <p>Communication strategy (consultation schedule)</p> <p>Periodic focus group discussions</p> <p>Face-to-face meetings and/or focus group discussions with vulnerable groups or their representatives</p> |