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Kiritimati Island Economic Development Project Programmatic Preparation Advance

STAKEHOLDER ENGAGEMENT PLAN

Prepared by
Ministry of Line and Phoenix Islands Development

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Abbreviations

CSO	Civil society organization
ECD	Environment and Conservation Division (in MELAD)
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework (of the World Bank)
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
INA	Institutional Needs Assessment
KDU	Kiritimati Delivery Unit (within MLPID)
KIED Program	Kiritimati Island Economic Development Program
KIEDP	Kiritimati Island Economic Development Project (future project to contribute to the KIED Program)
KIMP	Kiritimati Integrated Master Plan
KV20	Kiribati 20-year Vision (long-term development plan)
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 for the PPA)
MICT	Ministry of Information, Communication and Transport
MLPID	Ministry of Line and Phoenix Islands Development (implementing agency for the PPA)
NGO	Non-governmental organization
PPA	Programmatic Preparation Advance (funding agreement between World Bank and GOK)
PSC	Project Steering Committee
PUB	Public Utilities Board
SEA	Sexual exploitation and abuse
SEP	Stakeholder Engagement Plan
SESA	Strategic Environmental and Social Assessment
SH	Sexual harassment
TOR	Terms of Reference

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 km² 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 archipelago¹. 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.

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.

1.2 The Kiritimati Island Economic Development Program

Development vision. The development of Kiritimati is considered central to the Kiribati 20-year Vision (KV20), emphasizing fisheries and sustainable tourism as key productive sectors for economic growth. Specifically, the rehabilitation of Kiritimati's key transport infrastructure (airport, seaports, and the island's main road) is crucial for boosting eco-tourism, supporting domestic and international flights, supporting the fishing industry and to facilitate related trade and logistics. These efforts clearly show the need for targeted and coordinated development interventions in realizing the KV20 Vision, both in general and for Kiritimati in particular.

The Government of Kiritimati is realising the vision under the Kiritimati Island Economic Development Program (KIEDP); a long-term development platform comprising a series of investments phased across multiple years and sectors. The KIEDP is aligned with the GOK development priorities

¹ 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 km²; its lagoon is roughly the same size. There are five villages on the island, four populated and one abandoned: The Ministry of the Line and Phoenix Islands is located in London (the main village).

established in the Kiribati Development Plan (KDP, 2022), Kiribati National Infrastructure Investment Plan (KNIIP, 2022-32), and the Integrated Development Strategy (2016-36) for the Line and Phoenix Islands (LPIIDS).

The World Bank, along with other development partners, are supporting the GOK and MLPID with their vision and strategies to strengthen the enabling environment for sustainable and resilient growth in Kiritimati Island.

1.3 Kiritimati Integrated Master Plan, Strategic Environmental and Social Assessment and Institutional Needs Assessment

The GOK has requested a Programmatic Preparation Advance (PPA) from the World Bank to support technical advisory studies that will facilitate the planning and prioritisation of investments for the KIEDP. The PPA will fund the following:

- **An integrated set of preparatory studies:** Kiritimati Integrated Master Plan, Strategic Environmental and Social Assessment and Institutional Needs Assessment (KIMP/SESA/INA). A draft Terms of Reference (TOR) has been prepared for one consulting firm to carry out the following:
 - **Kiritimati Integrated Master Plan (KIMP)** will be a comprehensive economic roadmap with a phased approach. The KIMP roadmap will include actions and practical recommendations on: (i) policy and legal reforms needed to unlock the potential of the selected sectors and to draw in private sector innovation, skills, efficiencies, and (ii) financing the economic and social development of Kiritimati. The KIMP will identify climate risk and the availability and limitation of natural resources (water, aggregates, land etc.). The KIMP will provide the necessary framework for effective, sustainable and inclusive economic development and deliver a robust economic development plan, including spatial planning and industry development planning, taking into account other opportunities and physical and ecological limitations.
 - **Strategic Environmental and Social Assessment (SESA)** will be a holistic and comprehensive assessment of the environmental and social context and values of Kiritimati to support sustainable development, including climate adaptation and resilience, food security, biodiversity conservation, water security and social and cultural wellbeing. The SESA process will be participatory and this Stakeholder Engagement Plan (SEP) is an important instrument to document the approach. The SESA will present a systematic examination of the environmental and social risks and impacts associated with the KIEDP and the implementation of the KIMP and INA. The assessments, stakeholder engagement and recommendations of the SESA will be integrated into KIMP and influence the KIEDP program of investments.
 - **Institutional Needs Assessment (INA)** will provide a blueprint for the development of effective and sustainable governance institutions for Kiritimati Island. The analysis will include the existing constitutional, legislative and regulatory framework of Kiribati and Kiritimati Island, and the unique institutional setup of government and municipal responsibilities that has developed for Kiritimati Island. The INA will map existing structure and staffing of relevant government institutions, recommend the structure and staffing requirements for future island governance and oversight responsibilities, and analyze its revenue potential. The assessment will also draw upon findings and recommendations of the SESA and KIMP.
- **Establishment and operation of a delivery unit.** The Kiritimati Delivery Unit (KDU) will be established within the Ministry of Line and Phoenix Islands Development (MLPID) and be responsible for PPA implementation. Refer Section 2 for further detail.

- **Implementation support from Kiribati Fiduciary Services Unit (KFSU).** Refer section 2 for further detail.

2 Institutional Arrangements

The Ministry of Finance and Economic Development (MFED) will be the executing agency and the MLPID² will be the implementing agency for the PPA. To date, the MFED, through its KFSU, has experience providing coordination, fiduciary (financial management and procurement), and environmental and social risk management support to ten World Bank-funded projects. As the MLPID has never been an implementing agency of a World Bank project, it will benefit from the experience of KFSU staff based in Tarawa. The KFSU Social and Environmental Specialists will be available to support the KDU on an ad hoc basis, providing technical assistance, consultation expertise and resource, review of the KIMP/SESA/INA Consultant's reports, progress reporting, training, capacity building and managing grievances and incidents.

The KDU will be established on Kiritimati Island and will be staffed by:

- Director
- Technical Advisor
- Environmental and Social Risk Management Officer (ESRMO)

The MLPID will also establish a Program Steering Committee (PSC) to provide strategic guidance to the KDU and assist in overall coordination with other line ministries and GOK institutions. The KDU will act as the secretariat.

A civil society forum (see Section 3.3) comprising civil society, affected/beneficiary communities, and private sector stakeholders will serve as a platform for integrating knowledge and advice into the KIMP/SESA/INA, serve as a sounding board for KDU and the Consultants, and support for implementation of the grievance redress mechanism (see Section 5). The Civil Society Forum will be a key tool in the implementation of the SEP.

Detailed roles, responsibilities and resources are provided in Section 9.

3 Environmental and Social Management Requirements

Kiribati Legal and Policy system. All relevant Kiribati policies, laws and regulations will be followed in the implementation of the PPA Activities.

² MLPID is a government ministry of Kiribati, headquartered in London, Kiritimati, which 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 thirteen divisions: Administration; Development Planning; Water and Sanitation; Solar Salt; Heavy Machineries and Mechanical Division; Civil Engineering and Technical; Construction and Joinery; Power; Electrical Division; Housing; Information Technology; Account; and Tarawa Linnix Agency office.

The World Bank Environmental and Social Framework (ESF) comprises a policy and ten environmental and social standards (ESS). The ESF and ESS apply to technical advisory activities and physical investments funded by the World Bank. The ESS that are relevant to the implementation of the PPA Activities 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.

Following an environmental and social (E&S) risk screening under the World Bank ESF, the PPA technical advisory activities have been assessed as substantial risk because of the potential extent and significance of downstream risks and impacts of the KIMP, SESA and INA. No physical works will be funded under the PPA, but the KIMP will deliver a roadmap for a pipeline of physical investments which will have short and long term environmental and social risks and impacts.

The PPA has two environmental and social instruments prepared for the financial agreement: (i) An Environmental and Social Commitment Plan (ESCP) in accordance with ESS1 and (ii) this SEP in accordance with ESS10. The ESCP is a legal agreement that sets out material measures and actions as well as the timing for each of these actions to be carried out by the GOK, including the institutional, staffing, training, monitoring and reporting arrangements and grievance management in a manner acceptable to the World Bank.

This SEP has been prepared for the PPA to facilitate participatory planning and implementation. According to ESS10 MLPID, as the implementing agency for the PPA, is required to provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation. The SEP has been prepared according to the *Template for Substantial and High Risk Projects* (November 2023) and *OESRC Advisory Note Technical Assistance and the Environmental and Social Framework* (May 21, 2019).

In accordance with ESS1, a SESA will be prepared during the PPA implementation. A SESA is a key tool under ESS1 for assessing the risks of programs, policies and plans, within or across sectors and geographical areas. The purpose of the SESA is to provide a strategic analysis of environmental and social opportunities and risks and integrate environmental and social objectives, principles and actions into the KIMP and INA. The SESA process starts with an overarching understanding of the environmental and social values on Kiritimati Island and surrounding ocean and account for the current and future threats and opportunities. Once the risks and impacts are understood at a strategic level, the SESA process will identify measures to avoid significant adverse impacts, prescribe appropriate mitigation or offset activities, institutional strengthening and other measures to protect and enhance environmental and social outcomes. The SESA will also identify appropriate stakeholder engagement and grievance mechanisms for KIMP and INA implementation and future investments under the KIEDP. The SESA will integrate the requirements of the GOK country systems and the World Bank ESSs.

A capacity assessment of the GOK country systems has been prepared to provide information to the GOK and World Bank regarding (i) what, if any, additional measures (gap-filling) to those required under the country system are needed to meet the principles of the ESF; and (ii) what, if any, institutional support and strengthening will be required to properly implement and monitor the instruments developed. This analysis has informed the SEP and the ESCP and the Terms of Reference for the KIMP/SESA/INA.

4 Objective of the SEP

The overall objective of this SEP is to define the stakeholder engagement for participation, consultation and information disclosure for the activities funded by the PPA. The SEP outlines the ways in which MLPID / KDU will communicate with stakeholders and includes a mechanism by which stakeholders can raise concerns, provide feedback, or raise issues. The SEP will be updated by the KIMP/SESA/INA consultant during the Inception Phase of their contract and redisclosed (Section 8.3).

The ESS10 recognises the importance of open and transparent engagement between project proponents and stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve environmental and social sustainability, enhance awareness and understanding of projects and make a significant contribution to the successful design and implementation of projects. The SEP aligns with the objectives of ESS10:

- To establish a systematic approach to stakeholder participation and engagement that will identify stakeholders and build and maintain a constructive relationship with them.
- To assess the level of stakeholder interest and support and to enable stakeholders' views to be considered.
- To promote and provide means for effective and inclusive engagement with stakeholders throughout the process 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 proponent to respond to and manage such grievances.

The objectives of the SEP and stakeholder engagement process for the KIMP/SESA/INA are:

- 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 PPA implementation, as well as the type of information to be sought from them.
- To disseminate full and accurate information about the KIMP/SESA/INA to stakeholders including objectives, processes and activities.

- To confirm the participation of stakeholders by working with local and national 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 enquiry.
- To articulate roles and responsibilities.
- The inclusion and participation of potentially vulnerable or disadvantaged (such as low income earners, disenfranchised, elderly, people living with disability) (Section 5.3.3).
- To document the grievance redress mechanism (GRM) process, suitable to the PPA technical advisory activities (Section 7), and
- To enable stakeholder feedback to be received and incorporated/considered.

4.1 Consultation during the Preparation and Update of the SEP

GOK Ministries have reviewed earlier versions of the SEP and provided comment. During the Inception Phase of the KIMP/SESA/INA studies, the consultant will engage with other key stakeholders (as detailed in Section 3 of this report) so they can provide comments on the participatory and engagement activities and approaches. All comments will be considered/addressed in the preparation of the next version of the SEP, to be delivered as an output of the KIMP/SESA/INA Inception Phase.

5 Stakeholder Identification and Analysis

5.1 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 PPA technical advisory activities and the KIEDP more broadly, 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.

The KIEDP is a nationally important program of investments, spanning decades and expected to attract international interest. Identifying all stakeholder groups at this stage of the PPA preparation is not possible, but early research has been completed to identify the primary stakeholders located on Kiritimati and Tarawa.

Stakeholders 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 KIMP/SESA/INA and future investments, including people on Kiritimati and those who may be future migrants.

- Identifying specific individuals or organizations within each of these categories taking into account:
 - The localities within which people and businesses could be affected on Kiritimati;
 - How migrants from Tarawa and outer islands may be affected; and
 - The nature of the impacts that could arise.

5.2 Principles of Engagement

In order to meet best practice approaches and align with ESS10, the MPLID/KDU will apply the following principles for stakeholder engagement:

- Openness – engagement and consultations for the KIMP/SESA/INA will be ongoing throughout the PPA, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation,
- Informed participation and feedback – opportunities to participate in the development of the KIMP/SESA/INA; 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 - 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 (see Section 5.3.3). Engagement activities will targeted to the needs, expectations, priorities and objectives of the stakeholder. Engagement activities will be proportional to the risks and impacts of the stakeholder. Engagement with stakeholders will consider culturally appropriate means of engagement (ie: consider local cultural protocols).

5.3 Stakeholders and Interested Parties

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

- Primary stakeholders – institutions, entities and groups that are responsible for implementing elements of the KIMP/SESA/INA or KIEDP or will be directly influenced by the KIMP/SESA/INA and/or KIEDP, and who need to be closely engaged in the PPA activities.
- Secondary stakeholders - other Interested parties that may not be directly responsible for KIEDP implementation but who have a stake or interest in the development of Kiritimati Island and who consider or perceive their interests as being influenced by the KIMP/SESA/INA and/or who could affect the KIMP/SESA/INA preparation and implementation in some way, and
- Vulnerable groups – people, or groups representing people, who may be disproportionately affected or further disadvantaged by KIEDP implementation compared with any other groups 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 KIMP/SESA/INA.

5.3.1 Primary stakeholders

- Key government stakeholders and line ministries including MFED, MLPID, Ministry of Environment, Lands and Agricultural Development (MELAD)³, Ministry of Tourism, Commerce, Industry and Cooperatives (MTCIC), Ministry of Fisheries and Ocean Resources (MFOR) and Office of the Attorney General.
- Island councils / representatives of the Kiritimati Island community (individuals, households and businesses⁴ with a stake in development of the island and affected by (and/or benefit from) institutional reform or strengthening, migration and investments in infrastructure and housing), and
- Local civil society organizations (CSO) and NGOs representing environmental, social, cultural, business, trade and other interests.

5.3.2 Secondary stakeholders

CSO and NGO groups at the national level, Office of the President / Office of Te Beretitenti; Ministry of Infrastructure and Sustainable Energy; Ministry of Information, Communications and Transport (MICT), Ministry of Foreign Affairs and Immigration; Ministry of Internal Affairs; Ministry of Labor and Human Resources Development; Ministry of Health and Medical Services; Ministry of Commerce, Industry and Cooperatives; and Ministry of Women, Youth and Social Welfare.

Relevant state-owned enterprises (SOEs) likely to have an interest or may be affected, such as Kiribati Ports Authority, BwebwerikiNET 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.

Other secondary stakeholders include development partners with ongoing or pipeline projects in Kiritimati Island or willing to support KIEDP investments including Asian Development Bank and Government of Australia (through Department of Foreign Affairs and Trade and AIFFP). Development partners with existing projects include:

- European Union, New Zealand Ministry of Foreign Affairs and Trade and Pacific Community implementing the Kiritimati Island Water Project and Kiritimati Island Energy Sector Programme with a combined value of €12 million, and
- GIZ / German Ministry of Environment, SPREP / Secretariat for the Pacific Regional Environment Program and IUCN / International Union for the Conservation of Nature through the regional Marine and Coastal Biodiversity Management in the Pacific Islands project ("MACBIO").

Other country governments, donors and aid agencies may become interested or involved through the process.

5.3.3 Disadvantaged/vulnerable individuals or groups

It is particularly important to understand whether the preparation or implementation of the KIMP/SESA/INA and KEIDP may disproportionately fall on disadvantaged or vulnerable individuals or

³ MELAD is the regulatory agency responsible for implementing environmental and land-related legislation. The Environment and Conservation Division (ECD) is implementing the Kiritimati Island Conservation Protected Areas Project, an through its Wildlife and Conservation Unit (WCU) in Kiritimati.

⁴ According to the 2017 MCIC Business Registry Records there are approximately 200 registered business on Kiritimati.

groups, who often do not have a voice to express their concerns or understand the impacts of a project or program. It will be important to ensure that awareness raising and stakeholder engagement be adapted to take into account such groups' or individuals' particular sensitivities, concerns, and cultural sensitivities and to ensure a full understanding of the PPA activities and downstream benefits and risks.

Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input into the overall process are commensurate with those of other stakeholders.

There is no definition of vulnerable or disadvantaged in Kiribati and there is no specific requirement in the laws and regulations to ensure or require that the views and concerns of disadvantaged and/or or vulnerable groups are included in decision-making. Recent policy documents and national plans have made reference to improving inclusion of all i-Kiribati. Potentially youth and adolescents, people with disabilities, households or individuals suffering from poverty, members of the LGBTQI community, and sex workers can be considered disadvantaged or vulnerable.⁵ Other groups that may experience barriers to accessing information and participating in engagement activities are elderly people, care givers, households headed by women and the unemployed.

Other disadvantaged or vulnerable groups present on Kiritimati such as immigrants, the poor (or those living in hardship), sex workers, and members of the LGBT community will be identified during the SEP update (refer Section 8.3).

Engagement for vulnerable and disadvantaged people will be primarily through the CSO and NGO representing these groups of people including Te Toa Matoi the umbrella group for persons with a disability and KANGO – Kiribati Association of NGOs.

5.4 Types of Engagement

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

Methods for engagement are given in the Table 5.1 based on available technology/medium, culturally appropriate consultation methods and the purpose for engagement. Because of the large variety of stakeholders with different needs, a wide range of communications methods and mediums are proposed. The range of communication methods has already been tested and successfully used for investment projects in Kiribati (including on Kiritimati).

Table 5.1: Mediums of communication and engagement

Medium	Description
Civil Society Forum	A forum for regular participation in technical advisory activities, knowledge sharing, receiving progress reports and reviewing outputs. Representatives from primary stakeholder groups. See Section 5.5). Language will be a mix of i-Kiribati and English.
Focus group discussions and meetings	The focus group approach will pull together stakeholders with similar interests into a single meeting to discuss issues, share knowledge or to conduct participatory planning or design activities. Meetings usually have a very specific objective aligned with the expectations and interest of the stakeholders' present. This method also includes meetings with GOK departments and private sector stakeholders with

⁵ The UNFP report *Sexual and Reproductive Health and Gender-Based Violence in Kiribati* (2022) addresses key vulnerable populations including adolescents and youth, people with disabilities, LGBTQI communities and sex workers.

Medium	Description
	professional responsibilities as well as key civil society representatives who represent the voice of women and disadvantaged or vulnerable groups. All focus group meetings will be at locations and times suitable for the stakeholder and records will be kept. Regular meetings will include follow-up or recurring agenda items. Language will be a mix of i-Kiribati and English.
Island Council and KUC consultations	These consultations are focused to identify and discuss stakeholder concerns or to provide feedback (detailed information). These consultations will be face-to-face meetings with the councilors as an official group. It is also noted that women are not always equal participants in Island Council spaces, as such where women are not involved and able to participate openly and equally in the consultation, separate consultations will be sought with women's representatives. Language will be primarily i-Kiribati.
Community-based consultations	These consultations are focused to build awareness and understanding of the current and proposed development programs and to identify and discuss concerns or to solicit feedback using detailed information. These consultations will be, wherever feasible, held within the communities in i-Kiribati using simple concepts. Consultations will include female-only consultations and specific consultations with disadvantaged or vulnerable groups where this will enable them to engage more effectively.
Written and visual communication	
Community notice boards	Community notice boards will be used where relevant for communication of up-to-date information such as timing of upcoming consultations and for contact information for feedback, complaints and grievance redress. Language will be both i-Kiribati and English.
Letters	Formal methods of communication will be used to convey very specific messages, requesting information and/or invitation to participate in a meeting or workshop. Language will be a mix of i-Kiribati and English.
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 will be utilized for communications but arranging of formal community consultations is best arranged through other methods of communication. Language will be a mix of i-Kiribati and English.
Media	
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 feedback, complaints or grievance redress. Language will be i-Kiribati.
Social media	Connectivity is improving on Tarawa and Kiritimati and social media platforms may be useful for regularly sharing information (similar to a community notice board), to build awareness and for upcoming consultations or events. Social media can also be used as an informal feedback mechanism. Language will be a mix of i-Kiribati and English.
Other channels	
KDU interpersonal communication with stakeholders	The KDU will be the 'familiar face' of the project on Kiritimati and will, for many stakeholders at the community level, represent the most direct channel to the technical advisory activities. For this reason all three Kiritimati-based KDU staff will be trained specifically in the SEP objectives and principles and in how to manage feedback, complaints and grievances and to receive contacts for complaints relating to SEA /SH while upholding a survivor-centered approach. The ESRMO will have a specific responsibility for inter-personal communication with a range of stakeholders. A combination of face-to-face and remote communications (with support and other stakeholders based in Tarawa) will be implemented by the KDU staff. Language will be i-Kiribati and English.
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 and waiting for reply. Language will be i-Kiribati and English.

Medium	Description
Text blast	Providing simple messages to a large group of people, directly to their phone. This method is useful for announcing meetings, making requests or providing updates. Language will be -Kiribati and English.

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 is accessible, the timing convenient and the manner of conduct of the consultation socially and culturally appropriate. Consultations will be announced to give sufficient notice for participants to prepare and provide input.

Table 5.2 sets out the stakeholders initially identified by their main stake in the project and the type of engagement.

Table 5.2: Stakeholders and type of engagement required

Stakeholder	Main role and type of engagement
Primary stakeholders	
MLPID	KDU will keep the various ministry departments informed of progress and ensure they are included in consultations and engagement activities so they can contribute to the technical studies.
Executing agency - MFED	Responsible for ensuring the overall compliance of the PPA activity with the agreements committed to by the GOK; potential member of the PSC; to be kept updated by the KDU on progress and issues and to disclose all PPA documents on its website.
PSC	To be kept updated by the KDU; to provide high-level support as required to resolve project issues; and to assist in resolving project-level grievances as required.
Kiritimati Public Private Dialogue Civil Society Forum	Regular engagement, with training / capacity building, to contribute meaningfully throughout the process. Commitment to join the dialogue and collaborate with a range of stakeholders who may have different perspectives. Commitment to develop a longer term platform for participatory planning, implementation, contributions to decision making, and support for grievance management. Act as information conduits between the KIMP/SESA/INA consultants and KDU and their staff, members and communities.
MELAD – Environment and Conservation Division and Land Management Division	Has the mandate to provide advice and assistance on environmental, conservation and land access; member of the PSC; coordinates with donors and NGOs in the environmental sector (GEF, IUCN, Birdlife International etc.). Will be involved in meetings, emails, site surveys and field visits, technical review.
Ministry for Women, Youth and Social Affairs	Has the mandate to have an interest in, and support development of, women youth, and girls; member of the PSC; supporting key project consultation including vulnerable stakeholder mapping, communications, and messaging. Participate in meetings, technical review, email and interpersonal communication.
Island council	Key partner in KIED Program as well as preparation and implementation of the KIMP/SESA/INA; potential member of the PSC; member of Civil Society Forum.
Representatives of vulnerable stakeholders (incl. elderly, people living with disability, the poor, single parents, children and youth and others yet to be identified)	Will have an interest in the economic opportunities and welfare of vulnerable people (both on Kiritimati and in the migrant population). Relevant Ministries, CSO and NGO will be represented in the Civil Society Forum. Participate in meetings, technical review, email and interpersonal communication.
Secondary stakeholders	
OTB, 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 NGO	Key advisor on programs to support women and children's, people with disability, elderly access and safety; potential beneficiaries or service support; to be kept informed of all project activities and have ready access to project documents and

Stakeholder	Main role and type of engagement
	access to channels for communicating feedback and grievances; to participate in consultation around community program; provide information to key documents such as SEP updating, 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 still to be identified)	Individuals may be affected by downstream investments or migration and changes in social wellbeing. During community level engagement activities, consideration will be taken to the venue, time, duration and communication methods to enable these stakeholders to engage. For many, this may mean home visits ⁶ .
Development partners	To provide information about ongoing or pipeline projects in Kiritimati Island which may contribute to, or affect the design and/or implementation, of the KIMP/SESA/INA.

5.5 KIEDP Civil Society Forum

MLPID proposes to establish a structured engagement mechanism, such as an advisory committee to facilitate civil society participation in the KIMP/SESA/INA, building on existing structures as much as possible.

The civil society forum comprising non-governmental organization, councils and community leadership, along with private sector stakeholders will serve both as a sounding board and as a mechanism for participation in the development of the KIMP/SESA/INA to ensure their interests are considered and addressed. Indicative objectives are:

- To establish a systematic, structured and sustained approach to stakeholder engagement that will help build and maintain a constructive dialogue and relationship with them, in particular project-affected parties and beneficiaries.
- To ensure clear representation of key stakeholder groups, including at a local community level and including disadvantaged groups; and enable stakeholders' to participate in strategic and long term planning for Kiritimati Island.
- To promote and provide means for effective and inclusive engagement with project-affected parties and beneficiaries throughout the PPA period on issues that could potentially affect them.
- To ensure that appropriate information on strategic environmental and social issues and risks are disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.

The Civil Society Forum needs to achieve ESS10 objectives relating to stakeholder engagement include disadvantaged and vulnerable groups. The TOR will define how these committees would be comprised and relate to existing government structures.

⁶ Based on advice from the Ministry of Youth Women, Sport and Social Affairs: Social Welfare Officer and Kiribati Women and Children's Support Centre.

The key channels of engagement will be through face-to-face meetings in community venues.

It has been noted that the Kiritimati Urban Council (KUC) does not have the same scope of operations as other local governments in Kiribati as MLPID plays many of the basic infrastructure and administration roles that a council may otherwise play. However, it does have an established set of community engagement, governance and community representation structures and practices that the project should aim to acknowledge and build on (and at the very minimum not undermine). At a minimum KUC should be engaged for: protocol, advice on meeting arrangements and timing, key community stakeholder introductions and other supplementary advice.

Annex A presents the general composition discussed during PPA preparation. The full TOR, Standard Operating Procedures and associated guidance material are to be developed by the KDU, with support from the KFSU.

5.6 Stakeholder Analysis

Stakeholder needs, expectations, priorities and objectives have been analysed in relation to the KIMP/SESA/INA. This information will be used to tailor engagement to each key stakeholder. The analysis is summarized in Table 5.3.

Table 5.3: Stakeholder analysis

Stakeholders	Interest in the project	Role/Influence in the project
Primary stakeholders		
<ul style="list-style-type: none"> MFED, MLPID, MELAD, MTCIC, MFOR and Office of the Attorney General 	<ul style="list-style-type: none"> Line ministry or entity directly involved in KIMP/SESA/INA preparation and implementation Regulatory agencies with role in environmental protection, lands and public services on Kiritimati. 	<ul style="list-style-type: none"> PSC members, influencing PPA governance Supporting broader implementation of the KIEDP Consultation with their departments and external stakeholders Ensuring participation and feedback mechanisms are in place Inputs to the development of the SESA and KIMP Supporting the GRM
<ul style="list-style-type: none"> Representatives of the Kiritimati Island community (individuals, households, villages/communities and businesses) 	<ul style="list-style-type: none"> Livelihood opportunities and risks, including opportunities for employment and businesses May benefit from or be adversely affected by physical developments, institutional strengthening or reform, investments in housing and essential services, migration and social change. 	<ul style="list-style-type: none"> Members of the KPPD. Participation in the process of developing the KIMP/SESA/INA to influence the outcomes for the benefit of their members or interests. Contribute i-Kiribati culture, norms, knowledge systems and values, to ensure the KIMP/SESA/INA embeds culturally appropriate aspirations and approaches. Provide relevant background information regarding social, cultural, economic, livelihood and environmental context.

Stakeholders	Interest in the project	Role/Influence in the project
<ul style="list-style-type: none"> Kiritimati-based CSO and NGOs. 	<ul style="list-style-type: none"> Identification of social and environmental issues for integration into KIMP/SESA/INA Specific issues and risks for persons with disabilities Specific issues and risks with under-represented in the formal economy or civil society. Protection and strengthening of wildlife and biodiversity values. 	<ul style="list-style-type: none"> Participation in the process of developing the KIMP/SESA/INA to influence the outcomes for the benefit of their members or interests. KPPD members. Facilitating awareness raising and information sharing with the consultant team and with their members and external stakeholders. Provide relevant background information regarding the economic, social, environmental, cultural or other values, knowledge and interests of their organisation.
Secondary stakeholders		
<ul style="list-style-type: none"> Other government stakeholders incl. Office of the President (Office of Te Beretitenti); MICT, Ministry of Infrastructure and Sustainable Energy; Ministry of Foreign Affairs and Immigration; Ministry of Internal Affairs; Ministry of Labor and Human Resources Development; Ministry of Health and Medical Services; Ministry of Commerce, Industry and Cooperatives; Ministry of Women, Youth and Social Welfare. SOEs incl. Kiribati Ports Authority, BwebwerikiNET Ltd, Civil Aviation Authority of Kiribati, Kiribati Land Transport Authority, and Airport Kiribati Authority. 	<ul style="list-style-type: none"> Coordination and collaboration Information sharing Support the preparation of the KIMP/SESA/INA implementation Climate and or disaster risk management issues Organisations and the customers and citizens they serve will be beneficiaries of economic development and improved infrastructure. Potentially impacted by or benefit from institutional strengthening and reform. Recipients of donor funds which are scarce, therefore have interests to see an efficient road map of investments. 	<ul style="list-style-type: none"> Providing information to KDU on other projects, programs or activities of relevance to the KIMP/SESA/INA. Supporting key activities consultation including stakeholder mapping, communications, and messaging. Establishing communication lines and protocols / processes for community stakeholder participation incl. vulnerable groups Distribution of information to their networks.
<ul style="list-style-type: none"> Development partners incl. Asian Development Bank, Government of Australia (through Department of Foreign Affairs and Trade and AIFFP)., European Union / European Investment Bank, New Zealand Ministry of Foreign Affairs and Trade, Pacific Community, GIZ / German Ministry of Environment, Secretariat of the Pacific Regional Environment Program, IUCN / International Union for the Conservation of Nature and UNICEF. 	<ul style="list-style-type: none"> Provision of finance Provision of technical advisory support Alignment of development priorities with MPLID and MFED 	<ul style="list-style-type: none"> Engage in consultation to share information, understand the aspirations of GOK and citizens of Kiritimati and Kiritbati. Share information with their networks. Provide technical input and feedback. Commitment to support the implementation of the KIMP/SESA/INA and the KIEDP.
<p>Private sector and other enterprises incl:</p> <ul style="list-style-type: none"> Public Utility Board, Air Kiribati Ltd, Kiribati National Shipping Line, Kiribati 	<ul style="list-style-type: none"> Collaboration for investments and 	<ul style="list-style-type: none"> Consultation on KIMP/SESA/INA to share information and inform the

Stakeholders	Interest in the project	Role/Influence in the project
<p>Oil Company Ltd, Kiribati Copra Cooperative Society, and Amalgamated Telecom Holdings (Kiribati) Limited.</p> <ul style="list-style-type: none"> Kiribati Chamber of Commerce & Industries Transport and tourism sector operators 	<p>developments in KIEDP implementation.</p> <ul style="list-style-type: none"> Cooperation with MLPID for success of the project; shared aspirations of development. Potential beneficiaries of economic development and improved infrastructure. Potentially impacted by institutional strengthening and reform. May have to compete for donor finances and scarce resources during intense periods of investment (labor/workforce, energy, aggregates) if road maps are not well-aligned. 	<p>scope and outputs of the studies.</p> <ul style="list-style-type: none"> Share information to their networks. Provide feedback and submit grievances.
<p>Civil society organizations and NGOs:</p> <ul style="list-style-type: none"> Te Toa Matoi- umbrella group for persons with a disability KANGO – Kiribati Association of NGOs Conservation NGOs 	<ul style="list-style-type: none"> Identification of social and environmental issues for integration into KIMP/SESA/INA Specific issues and risks for persons with disabilities Specific issues and risks with under-represented in the formal economy or civil society. Protection and strengthening of wildlife and biodiversity values. 	<ul style="list-style-type: none"> Consultation on KIMP/SESA/INA objectives and outcomes. Distribution of information through their networks. Provide relevant information for the KIMP/SESA/INA. Provide feedback and submit grievances.
<p>Citizens from Tarawa and outer islands of Kiribati</p>	<ul style="list-style-type: none"> Opportunities for future migration due to climate risk Future business, work or social opportunities 	<ul style="list-style-type: none"> Receive awareness raising and kept informed through media and national networks. Provide feedback and submit grievances.
<p>International NGOs, aid agencies, public and private financial institutions, philanthropists</p>	<ul style="list-style-type: none"> Climate adaptation strategies Human rights and rights of migrants, climate justice Wildlife conservation Tourism opportunities and risks Nuclear legacy / justice Business or investment opportunities 	<ul style="list-style-type: none"> Self-select to receive direct communications from KDU/MLPID Kept informed through media and international networks Provide international perspectives.

6 Stakeholder Engagement Program

6.1 Process

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.

Stakeholder engagement during the PPA implementation period will be continuous. This is a complex series of technical studies with long term implications for Kiritimati and Kiribati. There is a large number and broad variety of stakeholders who will have divergent aspirations and opinions. The participation and engagement of stakeholders will be essential for achieving a more holistic, sustainable economic development road map. While it will be continuous, the GOK has identified key phases which will define the activities and messages. These are summarised below and detailed in Table 6.1.

The PPA ESCP, SEP and outputs from the KIMP/SESA/INA will be disclosed on the MLPID website. The public and stakeholders will have the opportunity to access the documents and provide feedback and this will be addressed by the KDU and the KIMP/SESA/INA consultants.

Phase 1: Setting up the KDU and consultancy

The first phase of has started and will continue through the PPA financing agreement process and the set up and staffing of the KDU. This engagement has been led by MLPID and supported by KFSU, MFED and World Bank. The key messaging relates to socialising the PPA purpose and outputs. This phase includes consultation on the draft ESCP, SEP and the TOR for the KIMP/SESA/TOR. Feedback on the TOR and the PPA implementation arrangements will be ongoing until KDU is ready for procurement.

While MPLID is setting up the KDU and while the KDU is finalising the TOR and going through the KIMP/SESA/INA procurement process, MPLID focal point and KDU staff will finalise the TOR for the PSC and KPPD and advisory committees and start to share information with the stakeholders about how they will be set up.

The first phase is to provide primary and secondary stakeholders with information about the KIMP/SESA/INA KIEDP and the coming engagement process and how to become part of the process. This phase will involve setting up the PSC, advisory committees and KPPD and starting some awareness raising meetings and other activities. Subsequent phases will involve participatory sessions, review sessions, knowledge and information sharing and consultations. KDU and consultants can provide progress reports, including status of various investigations and assessments, information and data gathered, for further feedback and identification of initial concerns, and allow for stakeholder validation of key elements of the KIMP/SESA/INA. During later phases stakeholders will be asked to review outputs and the KDU and consultants will share how comments, concerns and issues raised during the process have been taken into account.

For the preparation of meetings, 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. For public meetings a public notice will be advertised in the weekly newspaper (including digital/online versions) and announced of 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. Different venues for consultation meetings will be required, depending on the stakeholders being reached, and can include government office meeting rooms and or conference venues, community and village halls, churches, temples, police stations, schools, island council meeting rooms. The meeting 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 KDU may consider providing transport. Participation in consultation activities should not place a financial burden on any participant.

Stakeholder feedback. After any meetings, representatives (managers, directors, community/village leaders etc.) will act as intermediaries to brief and disseminate information to the other staff, community members, and their internal and external stakeholders. They will be tasked with bringing relevant information, feedback and issues back to KDU and the KIMP/SESA/INA consultants within a specified period.

Feedback will also be solicited during face-to-face interactions, and through surveys or social media. Specific feedback mechanisms for the various KIMP/SESA/INA consultation processes will be developed by the consultant and stakeholders in partnership.

Disclosure. Information will be disclosed at key times and milestones. The following information will be subject to disclosure: PPA SEP; PPA GRM procedures; KIMP/SESA/INA and KIEDP awareness and key information and program, orientation and socialization materials; regular updates on progress; Inception Report, Scoping Report and draft and final KIMP/SESA/INA reports.

The forms of disclosure will be through meetings and posting of documents, information and materials on GOK website. Reports and documents will be shared via email with individuals representing secondary stakeholders.

All reports will be in English with summaries available in i-Kiribati.

6.2 Stakeholder Engagement Plan

The stakeholder engagement plan is provided in Table 6.1. It will be updated as required (Section 8.3).

Table 6.1: Stakeholder engagement plan

Project activity	Consultation/message or activity	Timeframe	Objective	Stakeholders and participants	Responsibility	Method used and medium
Preparation of the PPA and Terms of Reference for the KIMP/SESA/INA	Awareness raising about the PPA Activities, process, timeframe, type and timing of engagement activities, key deliverables	During preparation of the PPA agreement between GOK and World Bank, and during the preparation of the KIMP/SESA/INA TOR.	To raise awareness, discuss proposed institutional arrangements, SEP requirements, and process for, and potential issues to be covered in, the studies.	GOK Ministries in Tarawa and Kiritimati	MLPID, World Bank	
	Socialization of ESCP, SEP and GRM				MLPID, World Bank	
Finalising the Terms of Reference for the KIMP/SESA/INA and procurement period	Continue to share the KIMP/SESA/INA TOR with stakeholders for review and comment. Recruit KDU. Draft TOR for KPPD and advisory committees distributed for comment.	Procurement period for KIMP/SESA/INA First three -nine months of PPA	To build awareness of the PPA activities. To prepare for SESA process.	Primary Stakeholders	MLPID KDU KFSU	Interpersonal communication via meetings. Email -sharing and reviewing documents. Workshops.
Establishment of advisory committees and KPPD	Finalise TOR and recruit members to the committees / KPPD Induction training / capacity building	Procurement period for KIMP/SESA/INA First three -nine months of PPA	To gain buy in from primary stakeholders. To set up committees with clear objectives, responsibilities and provide adequate training.	Primary stakeholders	KDU, MLPID, KFSU	Workshops meetings
KIMP/SESA/INA implementation	KIMP/SESA/INA inception phase and scoping.	Inception phase of KIMP/SESA/INA	To socialize processes for development of the KIMP/SESA/INA and key entry points for stakeholder engagement and participation To advise stakeholders how to provide inputs to	Primary and secondary stakeholders incl. representatives of island community and villages, Island Council	KIMP/SESA/INA consultant, KDU, KFSU	Meetings (KPPD and stakeholders), focus group discussions, key informant interviews, news articles (radio, TV and newspaper), social media posts
	Development of baselines, compilation of issues, challenges and risks Development and disclosure of SESA					

Project activity	Consultation/message or activity	Timeframe	Objective	Stakeholders and participants	Responsibility	Method used and medium
	Scoping Report and draft KIMP and INA. Participation of stakeholders in early discussions with the consultant.		baselines and identification of high level risks. Gather early data and information to inform studies.			
	Review of documents, participation events to inform studies and provide cultural lens. Validation of results and identification and rationalization of priorities		To develop cultural knowledge sharing and input. To share early draft outputs for comment. To facilitate understanding of potential benefits and impacts.	Primary stakeholders Secondary stakeholders	KDU SESA team, KIMP team Stakeholders	Workshops KPPD and stakeholder meetings Email and online meetings
Keeping national and international stakeholders informed	Information on progress, key outputs, activities and asking for feedback.	Throughout the KIMP/SESA/INA study	To inform broader stakeholders of progress	Public, international and national stakeholders who are not primary or secondary.	KDU	Website, social media, radio
Final draft documents	Validation of results and identification and rationalization of priorities	Last 5 months of the KIMP/SESA/INA contract	To build up knowledge and understanding of the draft KIMP/SESA/INA To verify stakeholder contributions and feedback.	Primary and secondary stakeholders.	KDU, KIMP/SESA/INA consultants.	Email, workshops, meetings to discuss and comment on final draft documents.
Debrief/lessons learnt	Understand the lessons learnt for the committees and KPPD	Last month of the PPA implementation	To build a sustainable civil society platform for KIEDP implementation.	Primary stakeholders	KDU, KFSU	Surveys, email, interviews, focus group discussions.

6.3 Risks and Mitigations Associated with Stakeholder Engagement

Encouraging local participation in the engagement activities will increase awareness about the KIMP/SESA/INA and KIEDP, build capacity of civil society and locals to effectively participate, improve understanding of processes and issues, and create ownership of key elements of Kiritimati Island development. However, implementing an engagement plan for long term economic and social development outcomes can also create risks. Some of the potential risks and issues relating to the SEP are described in Table 6.2.

Table 6.2: Risks and mitigations associated with the SEP

Risk	Mitigation measures	Responsibilities
Program delays	Ensure schedules and programs have flexibility for updates as required Set realistic timeframes, implementation schedules and reviewing schedules regularly	MFED, MLPID, KDU
Information capture	Ensure not only the KIMP/SESA/INA processes are widely socialized but engagement processes, access to GRM also widely socialized Clear communication of key channels for provision of information and receipt of feedback KPPD as broad representative group	MFED, MLPID, KDU, Island Council, KUC, 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. Managing expectations through the studies that the investment pipeline is not yet confirmed. Ensure stakeholders are aware of the GRM.	MFED, MLPID, KDU, Island Council, KUC, village leaders, community groups, CSO/NGO, KIMP/SESA/INA consultants
Over-engagement with communities can lead to stakeholder burnout. This is a risk in Kiritimati because of the various strategies, plans and projects that are happening concurrently.	It is intended to pilot the KPPD for the participation of civil society under this SEP that can be further developed and implemented throughout the implementation of the KEIDP in a systematic way to avoid over-consultation. The KDU and the KIMP/SESA/INA consultant will carefully plan consultations to be efficient and effective with people's time. work collaboratively with other projects to ensure consultation is done together where possible, or avoids taking too much time from stakeholders.	KDU, MLPID, KIMP/SESA/INA consultants.
Conflict between stakeholders	Building consensus for a road map for the development of Kiritimati Island will be difficult. Different stakeholders will have different needs, concerns and aspirations. Many will be beneficiaries while others could be adversely affected. Groups or individuals may chose not to engage, or may not be able to work constructively together. Effort will be required to ensure stakeholders can stay engaged, and engage on their terms, even when they have different viewpoints from others.	KDU, KIMP/SESA/INA consultants
Under-representation of future migrants from Tarawa and outer islands.	There will be a significant focus on the Kiritimati communities and stakeholders under the PPA activities. This is appropriate as these stakeholders will be the 'host communities' and experience the significant changes that come from future economic and social development (both benefits and risks). It is more difficult to identify the	KDU, KIMP/SESA/INA consultants, CSO, NGO,

	migrants from Tarawa and outer islands at this early stage in the planning, however their future will be also be influenced by the KIMP/SESA/INA and the downstream KIEDP investments. Efforts to ensure future migrant aspirations are represented by CSO, NGO and GOK Ministries.	
Reliability of information and data gathering	Clear communication on what data is required. Use materials in format and language appropriate for stakeholder groups. Validation workshops	KDU, \ KIMP/SESA/INA consultants
Political constraints	Processes to remain apolitical and ensure that the institutional arrangements are reviewed and updated as required and implemented throughout program delivery	MFED, MLPID, KDU

The KIMP/SESA/INA consultant will revise and update the SEP at the end of the inception phase, to identify/confirm existing stakeholders and update all stakeholder engagement activities and methods.

7 Grievance Redress Mechanism

7.1 Purpose of the Mechanism

The objective of the GRM is to systematically address grievances that may arise through, or as a result of, PPA implementation, in order to maximise implementation effectiveness while reducing negative ramifications to the widest group of stakeholders. The GRM covers the technical advisory studies carried out by the KIMP/SESA/INA consultant as well as any activities carried out by the KFSU, MFED, MPLID and KDU in relation to the PPA. It does so by providing a forum for stakeholders who have concerns about the overall process, specific elements of the activities, 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 GRM 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 activity implementation.
- To provide transparency and accountability throughout the implementation of activities amongst the relevant stakeholders
- To resolve any emerging environmental and social complaints/issues, and
- To promote good relations between the implementing agencies, stakeholder agencies and the community.

A GRM is a locally based, formalised way to accept, assess and resolve community feedback or complaints. The GRM provides important feedback for the continued improvement of projects. The GRM is a process for receiving, evaluating and addressing project-related complaints from communities at the level of project component or activity. The terms ‘complaints’⁷ and ‘grievances’⁸ are used interchangeably.

A GRM 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 GRM is also necessary to promote a harmonious relationship between MLPID, stakeholders and community members in order to enhance their acceptance of the program.

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

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

7.2 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.

Note that this process requires further consultation and refinement with MPLID and others to ensure that it also follows all Kiribati laws and policies.

Language barriers and insufficient literacy levels shall not withhold any person from lodging a complaint. The GRM form (see Annex B) shall be available in i-Kiribati and English as appropriate and disclosed to all stakeholders early in PPA implementation. The forms will be available at MLPID and KDU offices on Kiritimati and at MELAD, KFSU and other government offices (to be determined) in South Tarawa. KDU staff will assist those with verbal grievances to complete the form.

⁷ **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.

⁸ **Grievance:** a claim raised by an individual or group whose livelihood, health and safety or 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 PPA activities or to the longer term KIEDP implementation.

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

This GRM 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 proposed island development objective and processes
- Specific aspects of KIMP/SESA/INA processes
- Inclusion and participation
- Wellbeing, livelihood or employment, or access to land and resource risks
- Unacceptable behaviour by staff or employees of the MLPID, KDU, MFED or KFSU 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 GRM is to address and record any complaints that may arise during the implementation of the project. The GRM works within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level. The key elements of the GRM are:

- Receive the grievance
- 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 GRM 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 PPA. The KDU will be responsible for updating the GRM as required and disclosing information about the GRM process. The GRM procedure, explained below, will guide the resolution of grievances.

Receive and acknowledge grievance. As soon as the KDU is staffed and trained in the SEP by KFSU, the KDU will publicize the availability and access procedures for the GRM as part of wider KIMP/SESA/INA 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 GRM process and be given guidance on relevant steps to lodge a complaint.

Contact details for lodging a request for information or complaint. The KDU will identify specific contact details (email / phone / social media / office location / focal point (ESRMO)) and this information will be provided to all stakeholders early in PPA commencement (following KDU

training). This will allow any stakeholder or member of the public to request further information about the PPA activities, and to lodge a complaint or raise a concern or grievance. Request for information, feedback or complaint may be lodged in a number of ways: (i) directly with KDU focal person (ESRMO) using the specific contact details; (ii) indirectly through the KFSU, any government office, NGO or third party on Kiritimati or South Tarawa; or (iii) to the World Bank via the Grievance Redress Service⁹.

Once the complaint is registered, the complainant will be given a serial 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 GRM 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 PPA implementation. On Kiritimati, the KDU staff will 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 7.1 and elaborated in Annex C.

Table 7.1: GRM grievance register

No.	Date	Name of complainant	Details of grievance	SR Ref #	Person responsible	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 KDU ESRMO, as grievance focal point, will contact the complainant directly to develop solutions with oversight from the KDU Director and support from KFSU.

⁹ <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>

- For a level 2 grievance, the KDU ESRMO, as grievance focal point, will be responsible for identifying a coordinated management solution and response with the KDU and or MLPID. This should involve other senior managers and sign off from KDU Director.
- For a level 3 grievance, immediate intervention of related parties such as KDU Director, MLPID focal point, senior MLPID or MFED managers, and/or local authorities via the civil society forum / advisory committee, as required, to seek their advice on potential resolutions. Level 3 grievances require the response to be signed-off by the KDU Director. Sensitive grievances (see Section 7.3) will be acknowledged and may need to be handed over to a specialist, at which stage the KDU 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 complainant's 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 difficulty 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 the 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 easy or immediate corrective action by KDU ESRMO or Director.
- Resolution level 2: if the complainant is not satisfied with the resolution proposed by the KDU ESMRO or Director, then MLPID Focal Point will be involved to support collective resolution. PPA 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.
- 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 does not control the process beyond this level of resolution but acknowledges this.¹⁰

Advisory committee. If a complaint is escalated to level 3, then MLPID 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, KDU and any

¹⁰ The process for escalation and final resolution of issues is to be confirmed and updated with the next version of the SEP (Section 8.3).

other ministry of GOK office which may be relevant to the nature of the grievance, to identify an adequate resolution for the grievance.

Table 57.2: GRM for PPA Activities

Step	Process	Duration /timeframe	Responsibility
GRM training and implementation	KDU will have primary responsibility for the GRM throughout the PPA implementation. KDU staff will be trained by KFSU and World Bank within one month of contract starting.	At start of KDU staffing.	MLPID, KDU, KFSU
Grievance uptake	The complainant can take their grievance directly to the KDU ESRMO (as focal point) who will endeavor to resolve it immediately. If not satisfied with this solution, the KDU ESRMO will request the complainant to register a formal grievance by using a complaints form (Annex B). Depending on the nature of grievance, the KDU ESRMO will elevate as per the resolution levels and who needs to be involved.	Anytime	KDU ESRMO
Sorting, processing	For complaints satisfactorily resolved, the KDU ESRMO will update the register with the actions that were taken.		
Verification, investigation, action	On receipt of a formal complaint, the PDU Director will respond (standard letter Annex x) and endeavor to resolve it within two weeks of receiving the complaint.	Within 2 weeks	KDU Director
Acknowledgment and follow-up	If the matter cannot be resolved by KDU, MLPID will become involved. KFSU may advise. 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 and MLPID and take another two weeks for investigation and solutions or recommendations. MELAD will become involved if the matter is a land issue or environmental issue.	Within 2 weeks	KDU ESRMO
Escalation, Further investigation, action	If the complainant is still not satisfied, MLPID will refer to matter to the advisory committee for a resolution. The advisory committee, KDU Director and ESRMO (with support/advice from KFSU) 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 one month.	Within 1 month	MLPID focal point, KDU ESRMO
Escalation, Further investigation, action	If the complainant is dissatisfied with the outcome proposed in the POA, he/she is free to refer the matter to the Ombudsman's Office	Anytime	Ombudsman, complainant
Last resort	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	Complainant, court system

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

7.3 Confidentiality and Grievance Redress for Sensitive Issues

The risk of sensitive grievances, such as gender based violence (GBV), sexual exploitation and abuse (SEA) or sexual harassment (SH) as a result of the PPA activities is low. This is because the PPA will only fund technical advisory studies, with a small number of KDU staff and consultants travelling to or living in Kiritimati and / or Tarawa. GBV, SEA and SH risks are higher when there are large (typically male) migrant workers or change in community dynamics through resettlement. However, risks can still occur as a result of poor behaviour by any project worker, especially in remote locations or with vulnerable populations. As such, a process for grievance redress for sensitive issues will be implemented.

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 GBV, SEA and SH will be developed, including confidential reporting with safe and ethical documentation of cases. The Kiribati Police Service and Kiribati Women and Children's Support Centre will be part of the response team to support the survivor.

The grievance/complaint will be lodged in the GRM register, but **all correspondence related to the grievance will be kept confidential** and handled only by the person designated as the focal for the complaint. The GRM register 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 World Bank task team will also be informed at the time of lodgement of the grievance or complaint and will determine the process for handling the matter according to their guidelines¹¹, requirements and accepted practice i.e. who the responsible parties within each institution will be, outline of the information to be reported to management¹², 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.

7.4 Awareness Raising and Disclosure of the GRM

The KDU and their consultants will ensure that stakeholders are made aware of the GRM, how to get and provide information, make suggestions and raise concerns. This will be done in accordance with the SEP, throughout the implementation of the PPA activities through various methods including notices on community notice boards, on radio, social media, at stakeholder / community meetings, on written questionnaires, and during other forms of data gathering.

¹¹ World Bank. 2022. ESF Good Practice Note: Addressing SEAH in Project Investment Financing involving Human Major Civil Works. Washington D.C, Unites States.

¹² This is only to report that a SEA, SH or GBV 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.

Both successfully addressed complaints and non-responsive issues will be recorded by the KDU and shared with the KFSU at least quarterly. The KFSU will then report to the MLPID and World Bank in quarterly progress reports.

8 Monitoring, Reporting and Updates

8.1 Monitoring and Reporting to GOK and World Bank

Activities related to the SEP and GRM will be reported quarterly to the World Bank in accordance with the Environmental and Social Commitment Plan. SEP and GRM monitoring and reporting will be undertaken as a part of PPA implementation as per monitoring and reporting plan in Annex E.

The report will be prepared by the KFSU, with data and information inputs from KDU. KFSU will share the SEP and GRM report with MLPID and MFED and MLPID will incorporate the SEP and GRM report with all other quarterly reporting requirements to the World Bank.

8.2 Reporting Back to Stakeholders

Quarterly summaries of stakeholder engagement activities, grievances, enquiries, and incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by KDU and shared with key stakeholders and posted on the MPLID website. This process ensures transparency of the process.

Information on engagement activities carried out under the PPA, feedback received and how the feedback has been (or will be) considered/addressed will be conveyed back to the relevant stakeholders in relevant ways to be agreed with the stakeholder (e.g. sharing of minutes, email memos and presentations at subsequent meetings).

8.3 Updates to the SEP

The SEP will be updated by the KIMP/SESA/INA consultant during the Inception Phase of their contract and redisclosed. The update will include an updated stakeholder mapping exercise, feedback from key stakeholders, more detail on the engagement activities, the participatory planning and design activities, and a more detailed programme and budget. The timing will be within three months of their contract starting (finalised approximately one month following the end of the Inception Phase). The updated SEP will be reviewed by KFSU and reviewed and cleared by World Bank, prior to disclosure.

9 Responsibilities and Resources

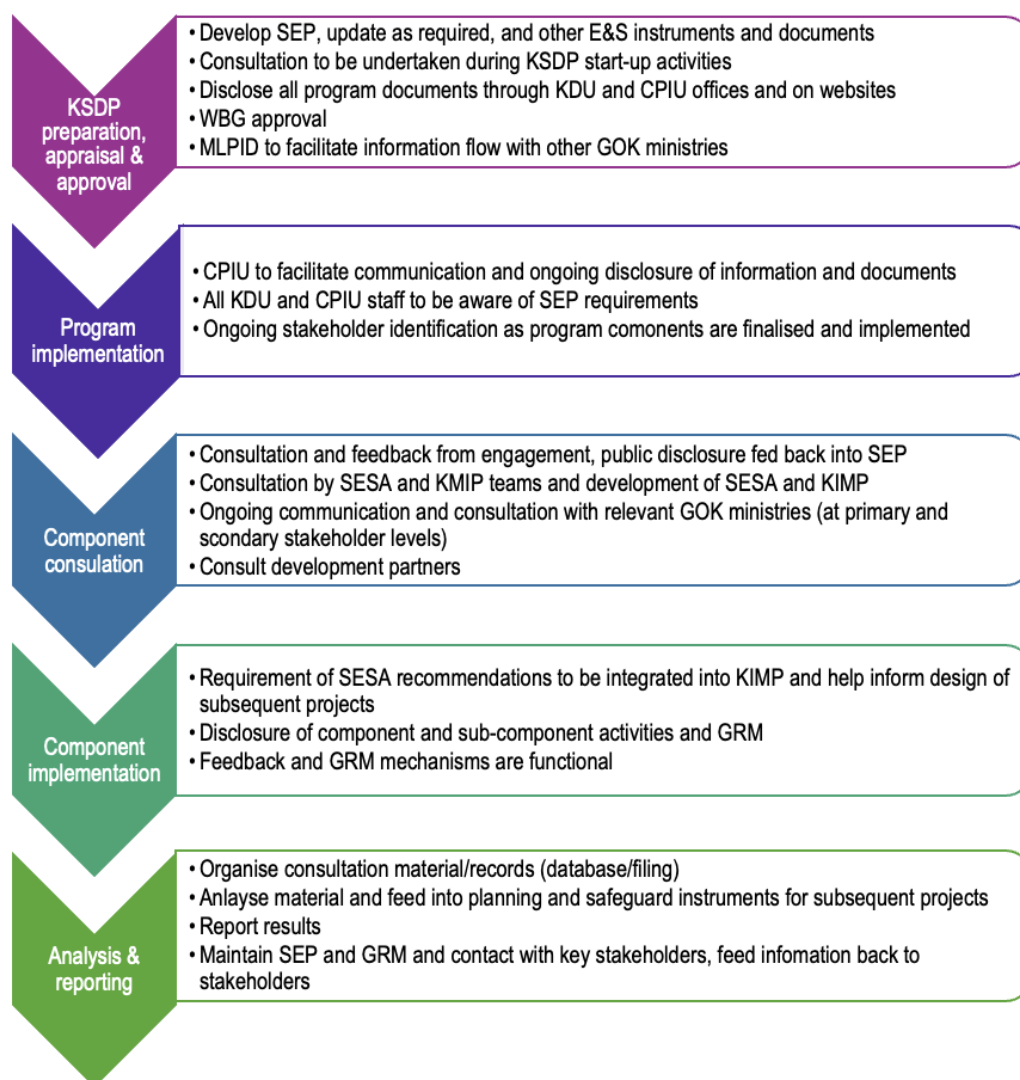
9.1 Roles and Responsibilities

The roles and responsibilities for overall E&S risk management and implementation of the SEP are outlined in Table 9.1 and the key steps for SEP implementation are shown in Figure 7.1.

Table 9.1: -Roles and responsibilities for environmental and social risk management

Responsibility	Role
MLPID	<ul style="list-style-type: none"> Ensure that the KDU is fully staffed and functional as soon as possible after the effective date, prior to the issue of the TOR for the PPA technical advisory studies and through the entire period of PPA implementation Maintain website to facilitate disclosure of program information Participate in the PSC and KPPD and facilitate/encourage/enable other stakeholders to engage. Ensure the compliance with the PPA ESCP and SEP. Attend training on the ESCP, SEP and GRM from the KFSU and World Bank.
KDU	<ul style="list-style-type: none"> Recruit, administer and supervise the PPA consultants to meet all aspects of their TOR, in compliance with Kiribati country systems, World Bank ESF and the PPA ESCP and SEP. Implement their responsibilities under the PPA ESCP. Provide day-to-day support in Kiritimati (and Tarawa when necessary) for KIMP/SESA/INA preparation activities. Facilitate meetings, media releases, information sharing, site visits. Carry out inter-personal engagements (phone, email, in person). Provide secretariat support to the KPPD and PSC. Attend training on the ESCP, SEP and GRM from the KFSU and World Bank. Provide information to MLPID for timely disclosure. Manage the GRM process, provide a focal point and ensure dissemination of information on the GRM. Maintain the GRM registry/record sheet and summarize for inclusion in reports and disclosure. Submit quarterly reports on ESCP, SEP and GRM implementation to KFSU, for reporting to MFED and World Bank.
KFSU	<ul style="list-style-type: none"> Provide training, mentoring and other forms of capacity building to KDU (In particular the ESRMO), MLPID and other stakeholders / PSC members on the ESCP, SEP and GRM. Provide technical advice and inputs into Consultants TOR and draft deliverables. Coordinate and / or attend consultations where necessary (KFSU may be required to host / coordinate meetings in Tarawa from time to time, or join consultations in Kiritimati) to support KDU, MLPID and the KIMP/SESA/INA consultant.
World Bank (as financier)	<ul style="list-style-type: none"> Review and clear ESCP, SEP and the SESA as part of the KIMP/SESA/INA outputs. Review program status and progress through quarterly progress reports Provide clearances (no objection) and disclosure, as required, of reports/documents, bid documents and bid evaluation reports, contract awards, monitoring reports. Provide support and assistance to KDU and KFSU as required, including training and capacity building. Undertake regular PPA implementation support missions.

Figure 7.1: Implementation steps for the SEP



9.2 Resources

The KDU will facilitate all of the stakeholder engagement activities and will be responsible for implementing the SEP. The ESSO will be responsible for tasks such as organising meetings, preparing, invites, keeping records etc. as well as being a focal point for information and feedback. Once contracted, the KIMP/SESA/INA consultant will be responsible for detailed planning of activities and engagements throughout their contract and will support KDU with communications content, guidelines, training, leading consultations, facilitating meetings and focus groups and keeping records.

MLPID responsibilities will be part of their Ministry role and are not funded by the project. This includes attending meetings, communications and managing grievances that are escalated.

The KFSU will support KDU with capacity building and may attend or lead consultations on Tarawa when necessary. KFSU will review materials and contribute technical assistance for communications, social media etc. KFSU will support with grievance management, providing capacity building and advisory to respond to grievances.

The budget for the SEP is estimated at just over \$AU68,000 (Table 9.2). This does not include the Consultant's costs, which will be incorporated into their lump sum contract.

Table 9.2: Estimated SEP implementation budget

Budget item	Unit	Unit cost \$AU	No.	Total cost \$AU	Remarks
1. Estimated KDU expenses					
1a. Travel costs for KDU ESRMO and KFSU E&S Specialists	Flight	2,000	6	12,000	TRW-CXI round trip. May be combined with other tasks/purposes and costs shared accordingly
1b. Suggestion boxes – KDU and Consultant office	Each	10	2	20	
2. Events					
2a. advisory committee meetings, focus groups, meetings, village visits etc.	Per	1,500	20	30,000	Venue hire and refreshments
2b. Sitting fees	Per	200	20	4,000	
3. Communication campaigns					
3a. Posters, flyers	LS	5,000	1	5,000	Printing costs, ream of A4 paper
3b. Radio advertisements or talk back	LS	500	1	500	
3c. Social media campaign	LS	3,000	1	3,000	Engage nat. social influencer
4. Grievance Mechanism					
4a. Training - advisory committee members	LS	1,500	2	3,500	Venue hire and refreshments
4b. GRM printing, posters, flyers, forms	LS	500	1	500	Ream of A4 paper, printing services
4e. NGO Support for SEA/SH	Per	1,500	1	1,500	Contingency for any SEA/SH requirements. Funding for their support services.
6. Other expenses					
6a. Miscellaneous + contingency	LS			5,000	
Total stakeholder engagement budget				68,020	

LS – Lump Sum

Annexes

Annex A: Outline Structure of the ‘Civil Society Forum’ / Advisory Committee

Context

A Civil Society Forum or Advisory Committee¹³ is a key participatory initiative to be piloted during the term of the PPA for the purpose of providing inputs to the Kiritimati Integrated Management Plan (KIMP), Strategic Environmental and Social Assessment (SESA) and Institutional Needs Assessment (INA). The Forum will build on existing structures as much as possible and will be used as a platform for inputs, discussion and feedback from a wide range of stakeholders. The intention is to develop a sustainable model of engagement that can continue into the KIMP/SESA/INA implementation phase and support the long term implementation of the Kiritimati Island Economic Development Program (KIED Program).

The Terms of Reference (TOR) for the forum participants will be prepared by the KDU, with support from KFSU and key stakeholders.

Purpose

- Advisory committee for developing the KIMP, SESA and INA in the short term and implementing the outputs in the long term for the purposes of achieving the KIEDP vision.
- Enables a wide range of stakeholders to participate in the process.
- Ensures the KIMP, SESA and INA are informed by a wide range of perspectives, particularly from primary stakeholders.
- Builds trust and partnerships between stakeholders.
- Supports transparency.
- Empowers stakeholder representatives to provide a conduit between MLPID and the people and institutions they represent (members/constituents/partners/community members/staff etc.).
- Be built on foundations of Kiribati culture and practice.

Composition

The intention of the Civil Society Forum is to achieve ESS10 objectives relating to stakeholder engagement, including interested and affected parties and disadvantaged and vulnerable groups. The KDU and Consultants will confirm the list of members following the Inception Phase of the technical advisory studies. There is no intention to duplicate any existing consultative forum on Kiritimati. Indicatively, the composition will include:

1. Island Councils and Community Leaders
2. Representative of health and disability, elderly etc.: one Kiritimati representative (may be a NGO or CSO);
3. Private sector: three from Kiritimati (to be determined following stakeholder mapping in the Inception Phase of the technical advisory studies. For example one hotel, one fishery, one market vendor).

¹³ Name of this forum to be discussed and agreed during early implementation.

4. Civil society: two from Kiritimati

Support and resourcing

- Each Civil Society Forum member will need training and capacity building to equip them with the skills to be able participate in strategic planning.
- For community groups, will need to have a sitting fee (incentive/honorarium) to cover time spent: receiving training, reviewing materials, deliberating, undertaking community engagement within their own communities

Key engagements

The Civil Society Forum may meet regularly (bi-monthly) or meet on milestones, to be confirmed. Particular activities and milestones are suggested to be:

- Induction, training and capacity building for KDDP participation
- KIMP/SESA/INA Consultant Inception
- Completion of baseline/scoping studies
- Drafting of KIMP concepts – participatory planning, contribution of i-Kiribati knowledge systems and approaches
- Draft KIMP/SESA/INA where risks have been identified but not all mitigation has been identified
- Final draft documents for final review/endorsement.

Administration, support and resourcing

The KDU will provide secretariat support to the Civil Society Forum, including setting agendas, arranging meetings, sharing information and resources, writing up minutes and ensuring review and feedback is provided in a timely manner to MLPID and the Consultants. The Civil Society Forum will have a chair and will require a quorum to operate. The members will meet in person but the events may be varied, including, but not limited to: site visits, participatory design sessions, information or knowledge sharing, review and comment on draft deliverables or milestones presented by the Consultant.

The Members will be required to share information to the people or organisations they represent, and to share relevant feedback and input from the people or organisations they represent back to the Civil Society Forum.

Capacity building may be required for members to effectively participate. They may be entitled to travel allowances, meal allowances or other stipends to be confirmed by MLPID and the World Bank.

Annex B: Grievance Form

Name of Person Making the Complaint <i>(information is optional and always treated as confidential)</i>				
Address or contact information for Person Making the Complaint <i>(information is optional and confidential)</i> E-mail Phone Address/Village				
If applicable, location where complaint/problem occurred <i>(write in)</i>				
Category of Grievance:				
<input type="checkbox"/> Environmental issues	<input type="checkbox"/> Social issues including gender, labor, health and safety, and child safety	<input type="checkbox"/> Grievances regarding consultation and engagement processes and access to information	<input type="checkbox"/> Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns	<input type="checkbox"/> Grievances regarding behaviour / abuse of power/intervention by consultant 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 KDU or the Project Steering Committee. Please also explain why the response or actions taken are not satisfactory

☐ No *(if NO, why not?)*

Complaint Recipient <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

KDU Focal Point *(insert contact person)*

Email *(insert appropriate address)*

Phone *(insert appropriate number)*

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

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[illegible]

Annex D: Template GRM Lodgement Response Letter

MINISTRY OF LINE AND PHOENIX ISLANDS DEVELOPMENT

Government of Kiribati

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 serial 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 Kiritimati Island Economic Development Platform. 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 KDU ESRMO or grievance focal point name and contact details* who will be very happy to assist you.

Type closing,

Type your name

KDU Director

Annex E: SEP Monitoring and Reporting Plan

Key evaluation questions	Specific evaluation questions	Indicators	Data collection methods
GRM To what extent have stakeholders been provided with accessible and inclusive means to raise issues and grievances? Has the MLPID / KDU responded to and managed such grievances within the GRM timelines?	<ul style="list-style-type: none"> Are stakeholders being informed of the GRM? Are stakeholders raising issues and grievances? How quickly/effectively are the grievances resolved? Is resolution of grievances following the established procedure? Were any grievances escalated to the advisory committee? If so, how many and how were these resolved? How many grievances were raised by complainants on Kiritimati Island? How many grievances were raised by complainants in Tarawa or elsewhere in Kiribati? 	<ul style="list-style-type: none"> 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. Information to include: category of grievance, gender of complainant, age of complainant (if relevant), location of complainant/complaint and method of complaint (written, in person, etc.). Number of SEA/SH cases reported and progress with resolution. Number, location, date and form of GRM socialization / communication actions or activities. (e.g. notice boards, announcements, sharing of GRM documentation, GRM awareness raising activity) 	GRM register. Consultation / engagement records.
Stakeholder engagement activities. What activities have been carried out in the past quarter and how does this align with the SEP?	<ul style="list-style-type: none"> What in person activities (including virtual meetings or events) have been carried out? What communication activities have been carried out? 	<ul style="list-style-type: none"> Number and type of activities/events: Where, when, purpose, who attended (group/representative), number of attendees, gender of attendees (if relevant). Number and type of communication activities and events, including social media: where, when, purpose/message (radio, social media etc.), target audience. Representation and number of meetings of KPPD 	KDU stakeholder engagement register KDDP meeting minutes. Consultant firm monthly reports (stakeholder activities, attendance etc.)

Key evaluation questions	Specific evaluation questions	Indicators	Data collection methods
Stakeholder participation and engagement impact on KIMP/SESA/INA. How have participation and engagement activities made a difference in development of the INA, SESA and KIMP?	<ul style="list-style-type: none"> Was there interest and support for the technical advisory studies and outputs? Were there any adjustments made based on the feedback received? Was priority information disclosed to relevant parties in a timely manner? 	<ul style="list-style-type: none"> Number of disaggregated engagement sessions held with or for vulnerable groups. Number of actions taken in a timely manner in response to feedback received during consultation sessions with stakeholders Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in KIMP/SESA/INA preparation and implementation List of key feedback/knowledge/learnings from stakeholder engagement that has been, or will be, addressed in the KIMP/SESA/INA or by the KDU or MLPID more broadly. Number and type of information disclosure on priority information, including draft or final documentation. Location of disclosure (including online website details), date and information disclosed. 	Consultant firms monthly reports (Stakeholder consultation attendance sheets and minutes) Website disclosures Meeting minutes Evaluation forms Structured surveys Social media/radio feedback