

Safeguards Due Diligence Report

September 2021

Nauru: Sustainable and Climate-Resilient Connectivity Project

Consultation and Communications Plan

Prepared by the Nauru Maritime and Port Authority for the Government of Nauru and the Asian Development Bank.

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Consultation and Communications Plan

Nauru: Sustainable & Climate-Resilient Connectivity Project

48480-003 / PI0014

Prepared for
Ports Authority of Nauru

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Executive Summary

The Sustainable and Climate Resilient Connectivity Project (the Project) will improve the port operations in Nauru and will build a climate-resilient port. It will also support institution reforms to strengthen the Nauru Port and Maritime Authority (NMPA) for sound and efficient port governance and management and will establish a revolving fund to ensure sustainable port operations and maintenance (O&M). The Project aims to improve sustainability, resilience and quality of life of the Nauruan people, improve the economy of the country and local communities. It will also improve reliability, climate resilience and efficiency of the Port of Nauru.

The Project is a grant from Asian Development Bank (ADB), Government of Australia and Green Climate Fund (GCF). The executing agency (EA) of the Project is the Ministry of Finance (MOF), while the implementing agency (IA) is the NMPA. A Project Management Unit (PMU) within the NMPA is tasked to assist in management and support for project management and administration activities; monitor and evaluate project activities and outputs, and report the findings to NMPA on a monthly progress report. The PMU is assisted by a design and supervision consultant (DSC).

The Consultation and Communications Plan (CCP) prepared for the Project provides an agreed communication platform for all key stakeholders particularly between the project beneficiaries and affected communities, the executing and implementing agencies, and donors to ensure that the former's views and interests are fully integrated into the project design, implementation, reporting and impact. This is an ADB requirement, stipulated in the Access to Information Policy (AIP) approved in 2018. The objective of the AIP is to promote stakeholder trust in ADB and to increase the development impact of ADB activities. The policy reflects ADB's commitment to transparency, accountability, and participation by stakeholders in ADB-supported development activities in Asia and the Pacific. It also recognizes the right of people to seek, receive, and impart information about ADB's operations¹.

Communication with communities and key stakeholders encompasses information sharing, engaging them in participation in activities so that they are well-informed about the project; local people interested to have jobs in civil works will have the opportunity to work and earn income; and they could participate in safeguards, health and road safety awareness, and other activities. Not all the stakeholders need to receive or provide information at all times, thus a hierarchy of communication can be used ranging from the major and urgent ones that need to be promptly addressed to those that need regular communication.

This CCP covers all information and communications relevant to the project. Communications for the project can include, but is not limited to:

- > meetings including one-on-one meetings with key stakeholders, committee meetings, focus group discussions, and key informant interviews
- > public and community consultation meetings
- > information sharing through a range of mediums including public information notices, TV or radio segments and announcements, electronic or print media, and the provision of other information materials such as bulletin boards, flyers, posters.

A CCP matrix has been developed that includes (i) communication objectives for the project, (ii) risks to the project due to poor communication, (iii) target audience/ stakeholders, (iv) timeframe and resource/ budget requirement, and (v) expected outcomes from effective communication.

¹ ADB Safeguard Policy Statement (2009) and Access to Information Policy (2018).

Abbreviations

ADB	Asian Development Bank
AIP	ADB's Access to Information Policy 2018
CCP	Consultation and Communications Plan
CEMP	Construction Environmental Management Plan
CHEC	China Harbour Engineering Company Ltd
CLO	Community Liaison Officer
DFAT	Department of Foreign Affairs and Trade (Australia)
DSC	Design and Supervision Consultant
EA	Executing Agency
EGM	Effective Gender Mainstreaming
EMP	Environmental Management Plan
GAP	Gender Action Plan
GCN	Grievance case number
GFC	Green Climate Fund
GON	Government of Nauru
GRM	Grievance Redress Mechanism
MOF	Ministry of Finance
MOU	Memorandum of Understanding
O&M	Operations and maintenance
PPP	Project Participation Plan
NMPA	Nauru Maritime Port Authority (formerly Port Authority of Nauru)
PMU	Project Management Unit
SPS	Safeguard Policy Statement 2009 (ADB)

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1 Introduction

The Sustainable and Climate Resilient Connectivity Project (the Project) will improve the port operations in Nauru and will build a climate-resilient port. It will also support institution reforms to strengthen the Nauru Maritime Port Authority (NMPA) for sound and efficient port governance and management and will establish a revolving fund to ensure sustainable port operations and maintenance (O&M). The Project aims to improve sustainability, resilience and quality of life of the Nauruan people, improve the economy of the country and local communities. It will also improve reliability, climate resilience and efficiency of the Port of Nauru. The Project is financed through grants from ADB, Government of Australia and Green Climate Fund (GCF).

The Project has three outputs, namely (i) *Output 1: Climate-proofed infrastructure constructed*. The project will construct new port infrastructure, including a wharf, a berth pocket, and a breakwater. It will also reconstruct port buildings, the container storage, and port security facilities. *Output 2: Sustainable operations and maintenance achieved*. The government will establish a revolving fund exclusively for maintenance of the new assets constructed under the project, and *Output 3: Efficient port operations established*. Under a parallel technical assistance, the government and NMPA will carry out port reforms including institutional strengthening, capacity development, tariffs restructuring, and engagement of the private sector in port operations.

The executing agency (EA) of the Project is the Ministry of Finance (MOF), while the implementing agency (IA) is the NMPA. A Project Management Unit (PMU) within the NMPA is tasked to assist the NMPA in management and support for project management and administration activities; monitor and evaluate project activities and outputs and report the findings to NMPA on a monthly progress report. Cardno Emerging Markets (Australia) Pty Ltd. is the design and supervision consultant (DSC) will assist the PMU in delivering the Project. The preparation and implementation of a Consultation and Communications Plan (CCP) is required by the financiers to ensure inclusiveness, transparency, timeliness and the meaningful participation of key stakeholders in the project.

The CCP essentially provides an agreed communication platform for all key stakeholders particularly between the project beneficiaries and affected communities, the executing and implementing agencies, and donors to ensure that the former's views and interests are fully integrated into the project design, implementation, reporting and impact. This is a requirement by ADB, as per the Access to Information Policy (AIP) (2018). The objective of the AIP is to promote stakeholder trust in ADB and to increase the development impact of ADB activities. The policy reflects ADB's commitment to transparency, accountability, and participation by stakeholders in ADB-supported development activities in Asia and the Pacific. It also recognizes the right of people to seek, receive, and impart information about ADB's operations.²

² ADB Safeguard Policy Statement (2009) and ADB Access to Information Policy (2018)

2 Consultation and Communications Plan

The CCP guides the planning and processes for communications for, and about, the project. It describes the purpose, methodology and outputs of the project by stages and the communications process to accompany those stages and activities. It covers relevant laws in the country and complies with the ADB's Safeguard Policy 2009 and Access to Information Policy 2018.

Specifically, the objectives of the CCP are to:

- i. Share information about the Project with the stakeholders in a timely and inclusive manner.
- ii. Engage the concerned stakeholders in a meaningful consultation using participatory approaches that would enable them to freely express their perception on the project, concerns and suggestions which are essential to foster partnerships with the beneficiaries and affected communities throughout the project cycle.
- iii. Provide information about the Project's grievance redress mechanism (GRM) to ensure that it will be functional, and the stakeholders are well informed of the process.
- iv. Ensure transparency in all Project activities.

2.1 Purpose

The purpose of the CCP is to ensure that appropriate and relevant information suited to the concerned stakeholders is shared or communicated to them, how to obtain information, when and how such information is communicated, and how information received is to feed into the different project stages. It provides an overall mechanism for guiding communications about the project for relevant government agency staff, implementation and supervisory consultants, project beneficiaries, local communities, contractors, and other stakeholders.

The CCP guides the planning and processes for communications for and about the Project. It describes the purpose, method and outputs of the Project being implemented by the NMPA/PMU, and the stages and processes for communication. It covers the requirements of relevant laws, current practice in respect of communications and consultations, and also complies with development partner requirements³ Informing the concerned stakeholders about the project and consulting them on various issues related to the project prior to and/or during Project implementation, which is essential to achieve proactive and meaningful people's participation and decision-making process.

2.2 Meaningful Consultation Principles

For a meaningful consultation to occur, the communication strategy needs to be defined and agreed for the Project. The following principles have been adopted as recognized means for conducting meaningful consultations. That is, consultation that yields understanding, engagement, agreement and acceptance. Meaningful consultation, as one element of communications, is an integral part of various phases of the Project including scoping, negotiating agreements and memorandum of understanding (MOU) signing, feasibility study, detailed design and procurement, construction, monitoring and maintenance.

³ Ibid.

2.2.1 Timely Communications

Proactive and timely communications are an important practice to help achieve Project outputs, and more broadly, Project outcomes. The timing of consultation can affect the quality of communications. It is important to engage key stakeholders as early as possible at be carried out throughout the project cycle including detailed design, construction and operation stages. If the project beneficiaries and affected communities (local people) and other key stakeholders are well informed at an early stage, they will understand well about the project, raise concerns and suggestions, and participate in the decision-making process. As per the Project's GRM, complaints will also be addressed in a timely manner.

2.2.2 Inclusion

Project design, implementation/construction and operation stages will be an inclusive process giving key stakeholders with interest on the project including affected communities, project beneficiaries, business sector, women and other vulnerable groups the opportunity to participate in consultation meetings, jobs in civil works during the construction and operation stages, capacity building/ training, awareness raising on health and communicable diseases prevention, and maximize the benefits after project completion. The CCP is designed to ensure that concerned stakeholders are well informed and consulted about the project including the vulnerable groups such as women, children, poor, and others who are at risks of being marginalized, are provided with opportunities for communication and in feedback during the project cycle (project design, implementation/ construction, and operation). Overall, they could maximize project benefits during and after the project has been completed.

2.2.3 Link to the Project Stages

The CCP is linked to the Project's stages, such that the different communication requirements under each stage have been identified (refer to **Table 3**, "Timeframe" column). Different strategies and levels of engagement are required at different times, depending by project stage. Recognizing this ensures the communication and consultation is sensitive to the needs of various stakeholders as the Project progresses (see **Figure 2-1** below).



Figure 1. Project Stages

2.2.4 Link to Social and Environmental Safeguards

The CCP identifies how safeguards consultation requirements can be met. Safeguard requirements of the financiers are clear that during design and implementation of a project, stakeholders and local people/communities need to be consulted and informed about project impacts and risks that may arise, the proposed mitigation measures and GRM so that they could express their views and suggestions to address the issues.

2.2.5 Link to Gender Activities

The project is categorized as Effective Gender Mainstreaming (EGM) and a Gender Action Plan (GAP) has been prepared. The CCP is linked to GAP activities. Women will be engaged by the project through consultation, employment, capacity building and

training, and awareness building about sexually transmitted diseases, HIV/AIDS and domestic violence⁴.

2.2.6 Disclosure

The CCP is a document of the PMU and will be submitted and reviewed by the financiers. It will be disclosed locally as well as through the websites of the financiers. It will be available locally through posting on the Project website link (www.nauruport.com). The purpose of CCP disclosure is to ensure it is publicly available to inform and advise the stakeholders how and when they can participate in project information gathering and consultations, and when and how other project notices and disclosures will take place.

Specific information disclosure about activities at the community level (specifically in Aiwo and Location) will also be undertaken by posting information updates about the Project at the Community Head's Office (or community hall) to ensure that local people could see/read, and potentially distributed in the Nauru Bulletin and over the radio when necessary. The information material will also include contact persons/telephone numbers who the local people could contact should they have questions or concerns to raise about the project, GRM, contractor, and others.

As required, the PMU will update the CCP through the environmental safeguards officer (ESO), and community liaison officer (CLO) hired by the NMPA/PMU, assisted by the DSC.

2.3 Overall Communication Approach

This CCP is focused on providing information at key times and promoting awareness about the Project, project outputs and activities. The roles and functions of the NMPA/PMU, and other government agencies and organizations involved in project implementation will also be disseminated to specific stakeholders including the affected communities. Communication with the communities and key stakeholders encompasses information sharing, engaging them in participation in activities so that they are well-informed about the project; local people interested to have jobs in civil works will have the opportunity to work and earn income; and they could participate in safeguards, health and road safety awareness, and other activities.

Not all the stakeholders need to receive or provide information at all times, thus a hierarchy of communication can be used in order to ensure appropriate information is provided to relevant stakeholders. Communications with, and advisory notices to, the project beneficiaries and those directly affected by the project (such as the local communities Aiwo and Location) and adjacent areas within the project site is essential through public information notices at specific times. Examples are information on the progress of the civil works activities outside of agreed days and times, road haulage and/or closures, safety signage that will serve as warning and/or information to the public, job vacancies, and others.

Communications will be undertaken using many methods including focus group discussions, public meetings, information sharing, key informant interviews, public information notices, TV or radio notices, 'text blasts' organized through the Government Information Office, electronic or print media, utilizing bulletin boards, flyers, posters, and others.

A CCP matrix has been developed that includes (i) communication objectives for the project, (ii) risks to the project due to poor or insufficient communication, (iii) target

⁴ ADB. Project Administration Manual, Sustainable and Climate Resilient Connectivity Project (p.24). December 2017.

audience/ stakeholders, (iv) timeframe and resource/ budget requirement, and (v) expected outcomes from effective communication.

2.4 Stakeholders and Target Audiences

To achieve the communication objectives, the CCP identifies the (i) consultation principles, (ii) key stakeholders, (iii) communication method/ means, (iv) timing, and (v) resource requirements. These are essential to ensure that CCP could cover the stakeholders in the project, particularly the communities and their leaders (heads), the local people, government agencies, and other stakeholders. Listed in Table 1 below are the identified key Project stakeholders.

Table 1. Project Stakeholders and Responsibilities

Stakeholders	Roles and Responsibilities
Ministry of Finance (MOF)	Executing Agency for the Project; involve in decision making.
Nauru Maritime Port Authority (NMPA) Oversight Body: Project Steering Committee (PSC)	Implementing Agency; oversee daily operations of the project and ensure smooth implementation of the project as per agreement with ADB and partner agencies.
Project Specific Management Body: PMU (Board Officer, CEO, DPM/PM, and staff)	Project Management, responsible for the implementation and monitoring - assisted by the CSC teams
Construction Supervision Consultant (CSC)/ Cardno	Assist NMPA/ PMU in implementing the Project for Output 1: Climate-proofed port infrastructure constructed.
ADB, DFAT and GCF	Provide funds/grants; Review reports, provide guidance to EA/IA; and work in partnership with the Govt. of Nauru through the EA/IA.
Relevant government agencies	Implements health and medical service programs. In the project, health agencies/ hospital will be engaged by the contractor to implement the training program on health awareness and communicable diseases prevention (i.e., STI/HIV, etc.) during the duration of project implementation (for local communities; and contractor / labor force).
> Ministry of Health/ Dept. of Health	
> Government Hospital of Nauru	
> Department of Commerce, Industry and Environment	
> Government Information Office	
> Department of Women Affairs	Implements programs on women and development, gender mainstreaming, etc.
Private Sector	Provides other services to the Nauruans and foreigners/ visitors in the country; they will be benefited by the project after completion (for transporting goods, etc. through the sea port.
- NRC	
- Business Group (operators/ owners of hotels, shops, restaurants, gas stations, etc.)	

Stakeholders	Roles and Responsibilities
Project beneficiaries (Aiwo and Location)	Located within the project area/ camp site and will directly be affected by the project (environmental, etc.).
Affected Landowners (in Aiwo and Location)	Will be benefited by the project in terms of jobs in civil works during road construction, operation and maintenance (O & M) stages.
Women vulnerable such as female headed households, elderly, and persons with disabilities Other stakeholders within the project area including local labor force hired by contractor, etc.	Will be the participants for awareness raising activities relevant to safeguards, health issues/ concerns, road safety, etc.
Media (National TV and radio stations)	Public information out-reach
Contractor (China Harbor Construction Engineering Company or CHEC)	Implementation of relevant elements of the CCP (as per the EMP and approved CEMP) Implementation of the relevant elements of the GRM Ensure timely completion with quality works and in compliance with standards stated in the covenant/ agreement with the Govt. Of Nauru and financiers

2.5 Key Communication Outcomes

The CCP is essential for ensuring project transparency, accountability and participation by stakeholders during the duration of project implementation and operation period. The stakeholders especially the concerned agencies and local people/ communities need to be engaged in meaningful consultations, be updated on project's progress and make decisions as required, and in turn they will understand and support the project. The communication medium and desired outcomes and communication by stakeholders are presented in Table 2 under section 2.7.

2.6 Communications with External Stakeholders

Participatory methods including public consultations, interview, FGD, training and awareness raising, and distribution of handouts and culturally appropriate information materials are the primary mode of communication that will be used with the concerned stakeholders. The use of tri-media including project poster, information fliers or booklet, radio, newspaper and television broadcasts are also proposed by the government agencies and partner agencies, in collaboration with the Government Information Agency. Information disclosure of key environmental and social safeguards and updates relevant to the Project on community notice boards, government and ADB/DFAT/GCF websites will also be used. The Project communication policy consists of the following, as described below.

2.6.1 Media

All external communications about the project, including request for meetings with government agencies are to be forwarded to the NMPA CEO through the PMU Head. All formal communications to government, and communities (districts) are to be directed through the NMPA CEO/ PMU Head. The PMU Community Liaison Officer shall assist

the PMU Head to facilitate timely action on the request and facilitate arrangements with the concerned agency. Local community and/or other concerned stakeholders.

To facilitate clear and correct communication lines, the Project team are required to inform/ refer external communications to the Team Leader or Project Manager who can then discuss with the NMPA/PMU senior staff for approval of the type of activity or event, or response to project inquiries or requests.

2.6.2 Government Agencies and Communities

Similar to the communications with media, the Project team are required to inform/refer external communications to the Team Leader or Project Manager who will then decide on the level of NMPA authority/ office to respond to the incoming and outgoing communications from the project. Protocols for contacting and interacting with communities, chiefs and area councils must be followed to ensure that the appropriate people are being consulted/ informed. Communications media such as project posters, bulletin boards set-up around the Project site (Aiwo/Location) are useful to inform communities/districts and other concerned stakeholders about the project, key activities, and timeframe.

2.6.1 Information Disclosure

The ADB Access to Information Policy (2018) seeks to promote stakeholder trust in ADB and to increase the development impact of ADB activities. The policy reflects ADB's commitment to transparency, accountability, and participation by stakeholders in ADB-supported development activities. It also recognizes the right of people to seek, receive, and impart information about ADB's operations. The policy applies to documents and information that ADB produces, requires to be produced by its borrowers or clients, or are produced and provided to ADB by other parties in the course of ADB operations.

The project will disclose safeguards related documents on the ADB website. Project information will be disclosed as per the country safeguard system, SPS and Access to Information Policy 2018. The Access to Information Policy does not permit disclosure of private or confidential information therefore due diligence, monitoring and consultation reports will be reviewed and as necessary personal information will be redacted prior to disclosure.

2.7 Key Messages

Table 2 below presents the desired outcome and key messages that need to be communicated in order to achieve the communication objectives as stated in the CCP.

Table 2. Desired Outcomes and Messages

Desired Outcome	Key Messages
The government, through the NMPA/ PMU build/ reconstructed an efficient climate-resilient port.	<ul style="list-style-type: none"> Building or reconstructing an efficient, sustainable and climate-resilient port that will provide access/ connectivity to the country and adjacent island countries all year round and could provide benefits to the people of Nauru through regular transporting of food items, health and other products necessary for improving the socioeconomic condition of the people.
People of Nauru are benefited by the project.	<ul style="list-style-type: none"> Project will provide benefits to the local people/ communities in terms of jobs in civil works, participation in consultation meetings, training and awareness raising

Desired Outcome	Key Messages
	<p>on safeguards, health, gender and other relevant information.</p>
<p>NMPA/PMU is supported by other Government Agencies to ensure laws and regulations are complied with, and increased understanding and ownership of the project.</p>	<ul style="list-style-type: none"> • Coordination with, and support from, government agencies.
<p>Contractor complied with the technical design, environmental and social safeguards, and social/gender activities/ measures as stated in the signed contract.</p>	<ul style="list-style-type: none"> • Contractor's compliance of safeguards policy of ADB and partner agencies; relevant laws of the Government of Nauru; activities/deliverables stated in the Gender Action Plan (GAP), and other provisions stated in the contract/ bid documents.
<p>Project activities implemented in a timely manner, and key issues/ grievances raised by the communities/ local people are addressed in a timely manner. Project beneficiaries increased level of appreciation of the project.</p>	<ul style="list-style-type: none"> • Grievance redress mechanism (GRM) process (how and to whom to raise complains, if any); grievances are addressed promptly and effective feedback mechanism. • Importance of the project, positive impacts and how people could maximize benefits. • The PMU is always open to the community; suggestions, opinions and requests are recorded, considered and addressed. CLOs dedicated to the Project are always available to listen and engage with the community and other stakeholders.
<p>Utilize the momentum of the Project to provide better outcomes for its citizens and residents.</p>	<p>Permanent Relocation</p> <ul style="list-style-type: none"> • Assessment undertaken by engineers found that the structural integrity of a large number of buildings at Location is classified as unsafe and dangerous. The engineers report states that "The buildings would not meet the minimum requirements for structural integrity and would not be able to be deemed suitable for occupation as it is likely that the buildings could partially/fully collapse under relatively small additional vertical and/or lateral loads, including those imposed by natural environmental and/or normal habitation load conditions." • The buildings have been deteriorating over more than half a century due to a confluence of factors, including extreme and punishing weather conditions, the quality of materials historically used (and their deterioration under these long-term conditions), and a lack of maintenance by landowners • Government of Nauru, decided to offer relocation to the households in eight identified blocks (48 units) in closest proximity to the Northern Container Yard (NCY). The Government of Nauru, which has long been concerned with the condition of Location buildings and the safety of the people residing in them, also decided to offer the option of permanent relocation to the families living in the dilapidated buildings adjacent to the three blocks identified as highest risk, in order to utilize the momentum

Desired Outcome	Key Messages
	<p>of the Project to provide better outcomes for its citizens and residents.</p> <ul style="list-style-type: none"> • The relocation process for the households would be managed through a Government-sponsored housing program, which would include the construction of houses for eligible families on suitable land identified by the families. • The NMPA has agreed to not only comply with all national laws and regulations, but also to meet ADB’s Safeguard Policy Statement (2009). • As there is often more than one family living in a unit, NMPA will construct replacement housing for each eligible family, rather than one replacement house for all of the families living in each identified unit. • A replacement house will not be constructed for non-Nauruan tenants, but they will be assisted to find an equally good or better alternative house to rent on the island if they are unable to identify suitable accommodation. <p>Temporary Relocation</p> <ul style="list-style-type: none"> • Temporary accommodation is provided to prioritized eligible residents until the planned permanent relocation can be completed. • Assessment carried out by engineers on the condition of Buildings adjacent to the Port Construction considered the structural aspects of adjacent buildings and impacts in particularly in relation to vibrations caused by compaction equipment and estimated a safe vibration range (1.0 millimetres per second). • Vibration monitoring tests indicated that vibration levels from the use of heavy machinery would be within the recommended safe vibration levels. • Concerns of residents on vibration have been heard by the Project and the Government decided to fast track the relocation finding temporary accommodation until the planned permanent relocation can be completed.

2.7.1 Relocation

The Government of Nauru is committed to showing compliance to its legislation, and to ADB principles in the SPS, through the implementation of this CCP and related monitoring. Due to ADB SPS requirements, the relocation program includes some elements that may not be featured within other government-sponsored relocation programs on the island. There are concerns that the approach taken on this relocation program may set unreasonable expectations for future unrelated relocations, which may in-turn impact the Government’s ability to carry out relocation activities in the future in a cost-efficient and culturally acceptable way. The Government will reduce and manage this risk through (i) this Plan, (ii) the Relocation Plan, which clearly demarcates its applicability, and (iii) carefully planned communications and consultation activities with future beneficiaries of Government initiatives that may utilize different approaches.

2.7.2 Project Participation Plan

The detailed information on the stakeholders, approach to participation and depth, and methods and who is responsible are shown in the project's Participation Plan (PP) is shown in Table 3. The detailed stakeholders Consultation and Communications Plan (CCP) is shown in Table 4⁵.

⁵ The standard templates for preparing Participation Plan (PP) and Stakeholders' Consultation and Participation Plan (CCP) were used as a reference. Source: ADB. *Strengthening Participation for Development Results. An ADB Guide to Participation*. 2012. ADB Manila.

Table 3. Project Participation Plan (PPP)

Stakeholder group	Objective of their intervention	Approach to Participation and Depth	Participation Methods		Timeline		Cost Estimate
	Why included		Method	Who is responsible	Start Date	End Date	
CONSTRUCTION PHASE							
Government Officials/ Heads of Government Agencies (EA/ client), e.g. NMPA/ PMU, and other concerned govt agencies.	<p><u>Objective 1:</u> To update the EA/PMU and concerned agencies on key issues that entail high level of decision-making relevant to the project.</p> <p><u>Objective 2:</u> To increase sharing of project information, status of project implementation (project cycle) and progress against the GAP.</p> <p><u>Objective 3:</u> To increase stakeholder ownership of the project and its outcomes.</p> <p><u>Why:</u> Awareness building will equip the stakeholder to better act on key issues/ concerns that need high-level decision-making; and in turn the government will increase level of ownership of the project and outcomes.</p>	Partnership (high)	<p>Consultation meeting</p> <p>Collaboration</p> <p>Information generation and sharing</p> <p>Note: Reports are prepared and shared on a weekly, monthly, quarterly and semiannual basis.</p>	NMPA Officers/ PMU officers Construction Supervision Consultants	Dec 2018	May. 2022	Budget for meetings included in the project (admin costs)
Local Communities/ Districts' Heads	<p><u>Objective 1:</u> To ensure reliable and regular flow of information and decision-making by engaging concerned stakeholders (community/ district level) during the construction period.</p> <p><u>Objective 2:</u> To make the Grievance Redress Mechanism (GRM) functional by informing the local communities/ districts and people affected by the project.</p> <p><u>Why:</u> Community concerns/ grievances raised need to be addressed in a timely manner so as to ensure smooth implementation of the project, and avoid delays. Local community/heads are the key focal persons for the GRM at the community level. If people are well-informed/consulted, there will be less complaints and level of satisfaction of the people on the project implementation will be higher.</p>	Information sharing Consultations (high)	<ul style="list-style-type: none"> Public consultation, community assembly meetings FGD In-depth interview Public notice boards Public notices (print, text blast, radio etc.) 	PMU CLO, Environment safeguard officer CSC specialists (based in Nauru) Contractor CLO	Feb 2019	May. 2022	Budget included in civil works and project admin. costs

Stakeholder group	Objective of their intervention	Approach to Participation and Depth	Participation Methods		Timeline		Cost Estimate
	Why included		Method	Who is responsible	Start Date	End Date	
Project Beneficiaries	<p>Objective 1: To ensure the stakeholder receive accurate information about the project, and enable them to participate in expressing their views and suggestions.</p> <p>Objective 2: To inform local people interested to work an earn income in civil works (including gender mainstreaming), core labor standards, and health and safety measures (i.e., potential social risks, safeguards impacts and mitigation measures).</p> <p>Objective 3: To increase the local communities' appreciation and ownership of the project and outcomes.</p> <p>Why: If project beneficiaries are aware of the project, progress and impacts, and mitigation measures, and benefits, level of appreciation will be increased and expectations are met.</p>	Information Sharing Consultations (high)	Public consultation, community assembly meetings Workshops FGD Public notice boards Handouts/ brochures (for workshops/ training or awareness raising campaign)	PMU CLO, Environment safeguard officer CSC specialists (based in Nauru) Contractor CLO	Feb 2019 Note: Information sharing, consultation/ community meetings are done on a regular basis by the PMU and Contractor's CLOs (every 2 weeks or monthly, or as required).	May. 2022 Note: Project will be completed in May. 2022. Activity could resume in the operation stage (c/o NMPA/ PMU officers).	Budget in consultation and awareness raising is included in contractor's budget' civil works.
Affected persons/ households and other groups such as women and vulnerable groups	<p>Objective 1: To increase level of awareness of the affected persons and other stakeholders of the GRM process so that they could express their views/ concerns and suggestions.</p> <p>Objective 2: To ensure that affected persons and other stakeholders are aware of the project impacts and mitigation measures, and how to maximize benefits from the project.</p> <p>Why: The affected communities experience impacts and have expectations from projects. Concerns of people directly affected by the project need prompt attention/ action so that projects are not delayed, and concerns raised are addressed in a timely manner. Low income</p>	Information Sharing Consultations (high)	Public consultation, community assembly meetings Workshops FGD Public notice boards Handouts/ brochures (for workshops/ training or awareness raising campaign)	Contractor's CLO and PMU CLO Environment safeguard officer CSC specialists (based in Nauru)	Feb 2019 Note: Information sharing, consultation/ community meetings/ GMR and responding to grievances are done on a regular basis by the PMU & Contractor's CLOs (every 2 weeks or monthly, or as required)	May. 2022 Note: Project will be completed in May. 2022. Activity could resume in the operation stage (c/o NMPA/ PMU officers).	Budget included in contractor's budget' civil works.

Stakeholder group	Objective of their intervention	Approach to Participation and Depth	Participation Methods		Timeline		Cost Estimate
	Why included		Method	Who is responsible	Start Date	End Date	
Contractor's Labor force (including women)	<p>Objective 1: To increase the stakeholder awareness of safeguards, core labor standards, gender and GBV, and GAP activities/ indicators in compliance of the provisions stated in the contracts.</p> <p>Objective 2: To encourage the contractor to hire local people including women and ensure their health and occupational safety at the construction sites.</p> <p>Objective 3: To familiarize the contractor with the Project GRM process compliance of the deliverables including hiring of female labor force, health and safety measures (as stated in the GAP and EMP), and quick action to complaints addressed to contractors.</p> <p>Why: Contractor has obligations as stated in the contracts which need to be complied with as per ADB SPS, GAP, and technical designs. During project construction, potential negative safeguards and gender concerns may arise.</p> <p>Affected communities have expectations which need to be addressed, and prompt action is essential to avoid and/ or address complaints and dissatisfaction among the local people/ communities.</p>	Information Sharing Partnership Collaboration Consultations (high)	Information sharing Meetings Workshops/ Training FGD Public notice boards Handouts/ brochures (for workshops/ training or awareness raising campaign) and job vacancies/ opportunities open to local people (both men and women).	Contractor's CLO and gender service provider (Govt. Health Agency). CSC (consultants) PMU CLO & environmental safeguards officer	Feb. 2019 March-April 2019 June 2019 and dates will be scheduled by the Health Service Provider.	May. 2022 Note: Project will be completed in May. 2022.	Budget included in contractor's budget' civil works.

Stakeholder group	Objective of their intervention	Approach to Participation and Depth	Participation Methods		Timeline		Cost Estimate
	Why included		Method	Who is responsible	Start Date	End Date	
Civil Society Organizations or Groups in the Local Communities/ Districts (e.g. religious group, business community, etc.)	<p><u>Objective 1:</u> To take precautions to reduce dust and other negative environmental impacts during construction period.</p> <p><u>Objective 2:</u> increase public's level of awareness on road safety and manage traffic flow within the project area (or near the construction camp sites) and prevent road accidents.</p> <p><u>Why:</u> To manage community expectations and ensure the general safety of the local people in the project area.</p>	Information sharing Consultation (medium)	Consultation meeting. FGD Information notice board Road signs IEC materials	Contractor HSE Officer PMU environment safeguards officer CSC specialists at the site (Nauru)	Feb. 2019 (since the time the contractor and SC were mobilized) Note: SC Resident Engineer conducts weekly meeting with the contractor; PMU environmental safeguards and SC engineers do daily monitoring at the site.	May. 2022 Note: Project will be completed in May. 2022. Note: SC Resident Engineer conducts weekly meeting with the contractor; PMU environmental safeguards and SC engineers do daily monitoring at the site.	Budget included in contractor's budget' civil works.

Table 4. Project Consultation and Communication Plan (CCP)

Objectives and Key Activities	Risks	Main Stakeholders	Messages/ Information	Communication Method (languages/ activities)	Timeframe	Responsibility	Resource Requirement	Expected Outcomes
<p><u>Objective 1:</u> To ensure regular flow of reliable project information/ sharing and participation on priority decision making process.</p> <p><u>Key Activities:</u> Regular meeting Special meeting (if required) Participation in ADB Missions</p>	<p>Managing expectations Accuracy and timeliness of information shared</p>	<p>Internal Stakeholders (concerned govt. Agencies, i.e., MOF, NMPA Board, PMU, other agencies) ADB and partner agencies</p>	<p>Project Implementation schedule/ activities Importance of consultation GRM process (how & to whom to raise complaints)</p>	<ul style="list-style-type: none"> > Consultation meetings > Participation in ADB missions > Project reports (weekly/monthly/quarterly and semiannual) > Website/emails > Telephone (for urgent matters) > Media 	<p>Jan 2019 to May. 2022 (Monthly or more frequent as required) Note: Note: Project will be completed in May. 2022. Activity could resume in the operation stage (c/o NMPA/ PMU officers)</p>	<p>NMPA/ PMU CSC (Cardno) team leader, and/or consultants at the project site (Nauru) Contractor</p>	<p>Budget (logistics for meetings, human resource), etc.; Printing of IEC materials <i>Budget source:</i> included in the project admin. costs.</p>	<p>Roles and responsibilities clarified. Updated progress/ status of the project. Participated in key decision making process. Increased awareness of the project and ownership.</p>
<p><u>Objective 2:</u> To increase awareness of local people/ communities and other stakeholders about the project, impacts (positive and negative) and mitigation measures, GRM, and how to maximize benefits from the project.</p> <p>Activities:</p>	<p>Lack of support to project due to Low level of awareness about the project / impacts and activities. Language and culture of the people may be a barrier to communication Managing expectations of local people</p>	<p>Project affected persons (landowners) Local community members (Aiwo/ Location) Other sectors (i.e., women, children, etc.) Other stakeholders</p>	<p>Project outcome/ outputs (activities) Project benefits (how local people could maximize project benefits, i.e., jobs, training, awareness raising, etc. GRM process (how & whom to raise complaints) Project impacts (positive/benefits), i.e. jobs, training, etc.</p>	<ul style="list-style-type: none"> > Public consultation > Community forums/ dialogues > FGD (for women for specific target groups & small meetings) > IEC materials/ handouts > Information Notices/ Bulletin boards 	<p>Jan 2019 to May. 2022 (Monthly or more frequent as required) Note: Note: Project will be completed in May. 2022. Activity could resume in the operation stage (c/o</p>	<p>NMPA/ PMU CLO, environmental safeguards officer CSC (Cardno) team leader, and/or consultants at the project site (Nauru) Contractor HSE and CLO</p>	<p>Human resources & Logistics during meetings; training, Printing of information materials/ training handouts <i>Budget Source:</i> Included in budget for civil works (contractor);</p>	<p>At least 30% female participated in community consultation meetings at (time and venue convenient for stakeholders). Increased appreciation/ support to the project. Key issues/ grievances raised are resolved/</p>

Objectives and Key Activities	Risks	Main Stakeholders	Messages/ Information	Communication Method (languages/ activities)	Timeframe	Responsibility	Resource Requirement	Expected Outcomes
Information sharing through public consultations/forums FGD for specific groups (i.e., women, & other groups in local communities).	Timeliness in addressing complaints/ grievances. Non-representation of other sectors		Potential safeguards impacts and social risks, including contagious diseases, etc.) and mitigation measures.	<ul style="list-style-type: none"> > Media (radio, TV, print, web, etc.) > Websites (NMPA, ADB, etc.) 	NMPA/ PMU officers)		and govt budget (NMPA/PMU)	addressed in a timely manner. Public satisfied of the GRM process.
<u>Objective 3:</u> To increase the level of awareness of the local people/ communities on gender/ social issues; health and communicable diseases prevention (including STIs, HIV & other contagious diseases), gender and social issues, and other safeguards mitigation measures. <u>Key Activities:</u> Training/ workshops Community Health Awareness raising campaign.	Language and culture of the training facilitators and the participants. Managing expectations Unclear concept and understanding of using broader terms in training such as “health awareness” and contagious diseases” without citing specific examples (a the topic is perceived by society/ people as a sensitive topic.	Local people/ communities (separate session for men and women) Other groups (such as youth/ students, etc.) Government health agency Contractor/ labor force (male and female), and foreigners and local.	Health awareness (such as healthy lifestyle, proper nutrition to stay fit and health, etc.; and communicable diseases (STIs, HIV, TB, etc.) prevention; modes of transmission and prevention; and health facilities/ services available (refer to available health materials from UN and Govt. health agencies, and other partner agencies (i.e., DFAT, etc.) Gender concepts/ relevant laws; ADB & partner agencies’ policy on gender and devt.	<ul style="list-style-type: none"> > Training/ workshops > Information sharing > Distribution of culturally appropriate IEC materials (easy to understand by the audience/ participants) developed or printed by Govt. Health agency, UN agencies, and other partner agencies. > Advocacy campaigns (awareness raising); > Collaboration with Government 	March 2019 to May. 2022 <i>Note: Every other 2 months as stated in the contract issued to contractor and stated in the gender awareness plan.</i>	Contractor Health Service Provider/ CLO CSC gender and comm. Devt specialist will assist and/or provide guidance. PMU CLO	Budget included in the project costs under civil works (contractor’s budget) Budget from the Govt. Health agency (counterpart)	Increased level of awareness of the public (local communities) on health related topics, and other social and gender issues; including core labor standards, gender mainstreaming, etc. At least 30% of participants from local communities attended the awareness raising/training.

Objectives and Key Activities	Risks	Main Stakeholders	Messages/ Information	Communication Method (languages/ activities)	Timeframe	Responsibility	Resource Requirement	Expected Outcomes
			Other social and gender issues.	health agency (service provider engaged by contractor)				
<p><u>Objective 4:</u> To inform the contractor's labour force on Health Awareness and Communicable Diseases Prevention (inc. STIs, HIV/AIDS, PTB, and other infectious diseases), and occupational health and safety measures.</p> <p>Key Activities: Training/ Orientation</p> <p>FGD for female workers</p>	<p>Language an culture</p> <p>Busy schedule of the construction/ lack of support from contractor to enforce the GAP indicator/ deliverable.</p> <p>Managing expectations</p> <p>Unclear concept and understanding of using broader terms in training such as "health awareness" and contagious diseases" (as explained above).</p>	<p>Labor force (separate for the Chinese and the local labor force)</p> <p>Contractor and labor force (separate session for female and male).</p> <p>Project implementers (men and women) - PMU and consultants.</p>	<p>Health awareness (such as healthy lifestyle, proper nutrition; communicable diseases prevention (STIs, HIV, TB, etc.); health facilities/ services.</p> <p>Gender awareness; gender mainstreaming, core labor standards</p> <p>Safety at work sites (as per CEM/ occupational health and safety) such as us of PPE, port safety, etc. (refer to CEMP & GAP)</p>	<p>Training/ workshops</p> <p>Information sharing</p> <p>Use/ distribution of culturally appropriate IEC materials (easy to understand by the audience/ participants)</p> <p>Advocacy campaigns (awareness raising);</p> <p>Collaboration with Government health agencies</p>	<p>March 2019 to May. 2022</p> <p><i>Note: Every other 2 months as stated in the contract issued to contractor and stated in the gender awareness plan.</i></p>	<p>Contractor Health Service Provider/ CLO</p> <p>CSC gender and comm. Devt specialist will assist and/or provide guidance.</p> <p>PMU CLO</p>	<p>Logistics (budget for transportation, Training materials/supplies, etc.).</p> <p><i>Budget source:</i> Included in civil works.</p> <p>Budget from the Govt. Health agency (counterpart)</p>	<p>All (100%) contractor's labor force (including women) participated in the health awareness training (STD, HIV, etc.) every other 2 months, monitored and reported.</p> <p>100% of new women employed in the Port were provided training in port safety.</p> <p>All female workers were provided training (separate from men) on gender/ health related topics, core labor standards, and other safety measures.</p> <p>Contractor's compliance of core labor standards and all deliverables as stated in signed contract/ bid documents.</p>

Objectives and Key Activities	Risks	Main Stakeholders	Messages/ Information	Communication Method (languages/ activities)	Timeframe	Responsibility	Resource Requirement	Expected Outcomes
<p>Objective 5: To establish and / or strengthen a functional GRM procedure/ body that will address complaints in a timely manner.</p> <p>Key Activities: Orientation (induction) on GRM process to concerned agencies/ parties involved GRM.</p>	<p>Managing expectations Language</p> <p>Low level of awareness of the GRM.</p>	<p>Local communities Other stakeholders</p>	<p>GRM process, roles and functions.</p> <p>Importance of consultation and GRM</p> <p>Roles and responsibilities of the parties/agencies involved in GRM.</p>	<p>Training / workshops Community meetings Brochures, posters Bulletin boards; public notices Telephone hotline Media</p>	<p>Jan 2019 Until project is completed on May, 2022. GRM will continue in the Operation stage. Note: GRM has been set up, orientation on the GRM, etc. is an ongoing process.</p>	<p>NMPA/PMU CSC (all consultants) Contractor/ CLO Community leaders (CLOs in Location and Aiwo)</p>	<p>Budget for meetings included in the project</p>	<p>Increased level of understanding on the topics discussed.</p> <p>Roles / functions clarified.</p> <p>Public satisfied with the GRM process.</p> <p>Grievances resolved in a timely manner.</p>
<p>Objective 6: To establish stakeholder interactions register to enable the recording, tracking, and following up communication with stakeholders</p>	<p>Managing expectations and differentiation from GRM Language Reliance on GRM to engage with the Project team</p>	<p>Local communities Other stakeholders</p>	<p>Importance of engaging with the Project and providing input, feedback and receiving project updates Importance of consultation</p>	<p>Community meetings Brochures, posters Bulletin boards; public notices Telephone hotline Media</p>	<p>Aug 2021 until Project completion</p>	<p>PMU</p>	<p>Budget from Relocation Plan</p>	<p>Increased local community and other stakeholder engagement. Effective management and follow up of interactions (inc, feedback, requests and other non-grievance interactions)</p>

3 Grievance Redress Mechanism and Disclosure

3.1 Grievance Redress Mechanism

A grievance redress mechanism (GRM) is a set of arrangements that enable local communities, employees, and other affected stakeholders to raise grievances with the project team and seek redress when they perceive a negative impact arising from the project's activities⁶. GRM is a key instrument to mitigate, manage, and resolve potential or realized negative impacts, as well as fulfil obligations under international human rights law and contribute to positive relations with communities and projects.

A grievance redress mechanism (GRM) has been established by the NMPA/ PMU. The purpose of the GRM is to receive, evaluate and facilitate the resolution of concerns, complaints and grievances about the environmental and social performance of the project. A key objective of the GRM is to strengthen safeguards implementation in the Project. Experience from projects across Pacific Island Countries has demonstrated that seemingly minor complaints can quickly become major grievances if left unattended and unmanaged. In other words, addressing grievances early has been found to be ideal.

The GRM is based on accepted practices in Nauru including previous experience on ADB projects and provides an accessible, time-bound and transparent mechanism for complainants to voice and resolve social and environmental concerns linked to the project.

With the inclusion of the permanent relocation of residents at Location, a similar GRM process will be utilized for the relocation, however as the Civil Works Contractor is not a party to this government process a revised process referred as the Relocation GRM (R-GRM) has been established. This will work under the same principles and has a separate registry (R-GRM Registry (shown in Appendix A)).

3.1.1 Scope

The GRM does not extend into or interfere with any of the mandates (jurisdiction), roles or responsibilities of external entities, unless such entities are part of the GRM process. In the same way it also cannot, by virtue of its existence, obstruct or appear to obstruct, the full function and operation of any government agencies. Where a particular grievance is identified and brought to the attention of the GRM and where the GRM does not have the jurisdiction to manage it, they are required to automatically refer these grievances to the appropriate external entity to handle.

Limitations

The GRM:

- Cannot deal with grievances that arise from issues that are political in nature.
- Cannot resolve national or district level policy issues. It can only assist in facilitating the dialogue required to help reach a solution.
- Is a facilitative measure and not an adjudicating body.

⁶ Definition adapted from World Bank, United Nations Conference on Trade and Development.

- Provides a channel through which grievances are directed to the Project Team for redress when appropriate at the Project level but not necessarily to resolve all grievances.
- Cannot resolve grievances that are outside the scope of the project (i.e., do not arise from the implementation of the Project).

3.1.2 Process

The Contractor has engaged a CLO to address community grievances that may be raised relevant to the project. Any technical, construction, labor law, gender and other social issues and grievances, when Nauruan personnel is engaged, have to be dealt straight with the Project Manager of the PMU and then with the EA, if issues cannot be resolved.

The GRM has been developed as a step-by-step procedure to register and track grievances concerning and is based on the following principals to ensure successful GRM implementation: (i) outlines the project complaints and procedures; (ii) identifies responsible individual or entity to receive; and (iii) facilitates the submission of any complaints, including timeframes for response.

Step 1 – Grievance lodgement and reception/acceptance

Grievances are lodged using any of the following channels:

- in person to the Contractor CLO;
- by phone calling or texting the Contractor CLO; or
- in writing emailing the Contractor CLO or sending a letter.

When grievances are lodged with the CLO, regardless of the level of risk or nature of the grievance, the officer will complete a Grievance Redress Registering and Monitoring Form with the complainant. All grievances are to be lodged using the Grievance Redress Registering and Monitoring Form, a template of the form and screenshot of the Registry is provided in Appendix A.

A key responsibility of CLOs is to support claimants in lodging their grievances. This may include completing the Grievance Redress Registering and Monitoring Form with illiterate complainants. All forms should be signed by the complainant/s and complemented with relevant photographs and/or other supporting documentation as required.

Step 2 – Acknowledgment and record

Whitin the same day the grievance is lodged, the Contractor CLO submits the form to the PMU (to both the Relocation Coordinator and QA Officer). Once the grievances are lodged and recorded in the GRM Registry and grievance case number (GCN) is allocated, the complainant receives formal acknowledged of the grievance been lodged. Acknowledgment should be provided to the claimant within one business day of lodgement. The acknowledgment letter should include:

- the GCN
- particulars of the grievance (person who lodge it, address, date and type of grievance)

- brief explanation of the GRM process, a simplified version of Figure 2 would help the complainant to understand the process and the GRM to manage expectations
- statement on confidentiality and management of private information
- expected timeframes
- contact details of the CLO and
- instructions on how to update or withdraw the grievance.

Allowing claimants to update or withdraw lodged grievances may avoid the lodgement of additional grievances or having to reassess grievances once a response has been provided to the claimant.

Steps 3 – Assessment and risk identification

Upon receipt of the grievance, the CLOs reviews and determines if the complaint meets the eligibility criteria.

Grievances are assessed based on the information provided by the claimant and readily available information. The assessment should follow a risk management approach where the assessment identifies the risk and implications to the claimant and the project. Details on the risk assessment are provided in Section 3.3. Potential outcomes of the assessment include:

- *grievance is not related to the Project*, it is then referred to the relevant authority and the complainant is formally notified (refer to process in grey colour in Figure 2);
- *grievance is of low risk*, the Contractor CLO investigates with support from the Contractor HSE and relevant project team members are notified so they can either a) address the issues been identified through the grievance and promptly provide a resolution or redress (Step 5) or b) provide further information and/or assist in the collection of data and information for the investigation (Step 6); or
- *grievance is of medium to high risk*, the grievance is handed to the PMU CLO for investigation.

Step 4 – Investigation

During the assessment appropriate investigation required is identified. The purpose of Step 4 is to provide the CLO or RC (as necessary) with relevant information to understand the grievance, its impacts and any other necessary information that can be used to consider the case and provide relevant redress.

The investigation may require additional information sourced from other agencies such as Government departments or other authorities or directly from the complainant. In the latter case, the CLO may be required to meet with the complainant to source additional information or better understand the grievance.

All relevant information sourced is added to the grievance and the database is updated to reflect the addition of such additional information.

Step 5 – Resolution

Depending on the findings and their severity, a resolution is often decided immediately. In cases where the resolution does not follow predetermined criteria, the case must be presented to PMU Project Manager for consideration.

The outcome of the resolution is communicated to the PMU for sign off and implementation. As required, the PMU may decide to communicate the outcome of the resolution to the Project Steering Committee and NMPA Board.

The outcome of the resolution is communicated to the complainant. If the complainant accepts the proposal, the project team implements it according to the process and timeframe set out in the resolution/redress proposal. The complaint is only closed when the actions in the proposed resolution are satisfactorily implemented.

Steps 5a to 5d – Redress unsatisfaction

If the complainant does not accept the proposed redress, before the grievance is reconsidered, additional information is to be collected so the grievance can be reviewed. This may come from the complainant or other sources. The CLO is responsible for sourcing such information and as necessary liaise with the complainant to source it.

When grievances are accepted by the complainant following review of the issue then is time for closure (Step 6). If the grievance remains unresolved the grievance is referred/escalated to the NMPA's CEO's Office for resolution (Step 5a shown in Figure 2). Additional information may be required, and response would take place within 14 days of being submitted. Depending on the nature of the grievance, the NMPA's CEO may decide to refer the decision on the resolution to the Project Steering Committee, and/or the NMPA's Chairman of the Board of Directors.

If the resolution is accepted by the complainant following review of the issue then it is time for closure (Step 6), however if the grievance remains unresolved the grievance is referred/escalated to the Deputy Minister for consideration and response.

Step 6 Closure

Once the resolution to the grievance is accepted by the complainant and the actions required in resolution take place, the grievance is closed.

Recording

All grievance information is placed in a single file and stored for future reference. Similarly, the outcomes are recorded in the GRM Registry and reported. Both the grievance files and database are held by the PMU. The GRM process is shown in Figure 2 and that for the relocation is shown in Figure 3.

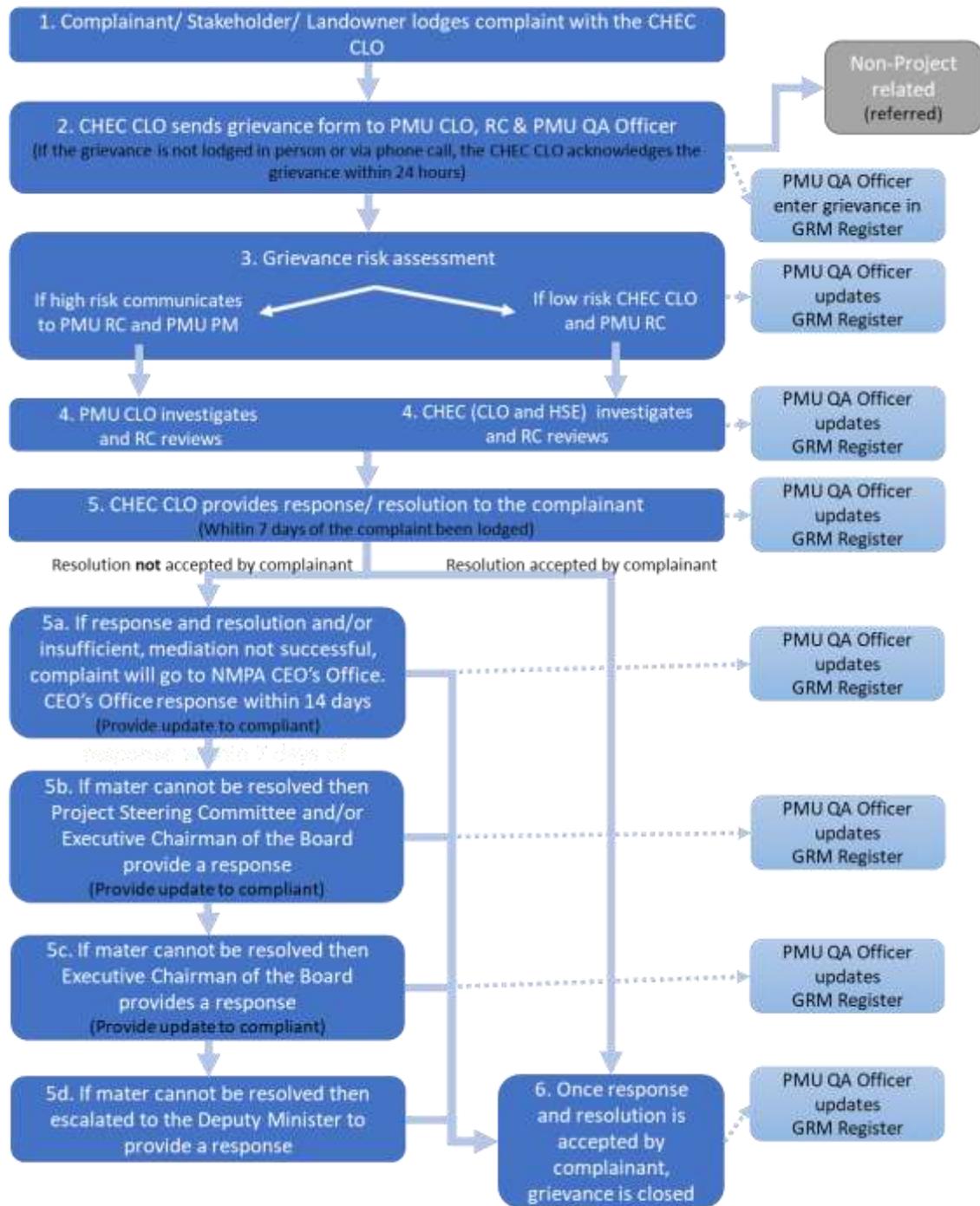


Figure 2. Grievance Redress Mechanism Process

3.2 Disclosure Requirement

The GRM will be disclosed during community consultation meetings in the project site prior to commencement of any civil works. A copy of a summary brochure outlining the GRM, will be made available to the community through provision of a copy in the village meeting hall and women’s meeting. A copy of the GRM will be available to the contractor (CHEC), NMPA/PMU and other community head’s office.

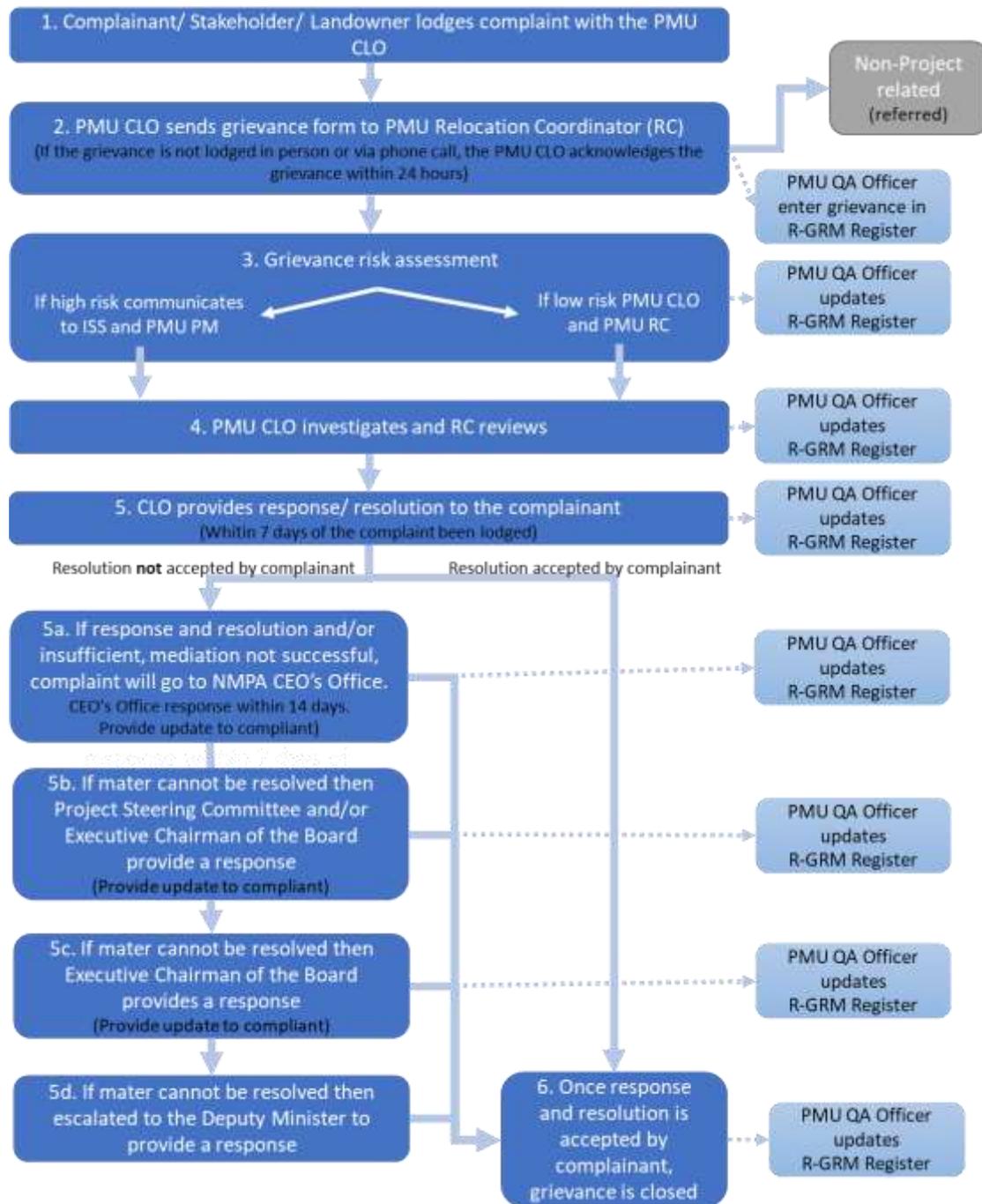


Figure 3. Relocation Grievance Redress Mechanism Process

3.3 GRM risk classification

A simple risk management approach where the likelihood and the consequence are considered is the tool to be used when identifying the level of risk and its consequent management.

Low risk – the grievance is entirely managed by the CLO. It is expected that most of the grievances will fall in this level.

Medium risk – the grievance is managed by the CLO with support from the PMU CLO or if required the PMU Project Manager / NMPA CEO.

High risk – the grievance is elevated PMU Project Manager / NMPA CEO for assessment and management.

Not applicable risk – those grievances not relevant to the Project and that are referred externally.

The criteria to classify the risk according to the likelihood and consequence is described in the matrix in Figure 4. The matrix also indicates when the PMU Manager is required to be engaged in the resolution and management of the grievance.

		Consequence					
		People	Assets	Environment	Project, GOK, funding agency reputation		
		No injury	Slight injury, no life threatening	Minor injury, no life threatening	Injury requiring medical intervention, no life threatening	Life threatening injury	
		No to negligible damage	Slight damage, no impact to livelihood	Minor damage with minor temporary economic impact	Damage to property with impacts on livelihood	Major damage with permanent impacts on livelihood	
		No effect	Slight temporary Effect	Minor temporary effect	Local effect	Major Effect	
		No impact	Slight impact	Limited impact	Considerable impact	Major impact	
Likelihood	Certain	Low risk CLO to manage grievance. Follow flow chart on Figure 2 (or 3 for Relocation).		Medium risk Engage PMU RC and/or PMU Project Manager as required. Follow flow chart on Figure 2 (or 3 for Relocation).		High Risk Engage PMU Project Manager and Project Steering Committee as required. Follow flow chart on Figure 2 (or 3 for Relocation).	
	Almost certain						
	Likely						
	Possible			Medium Risk			
	Unlikely						

Figure 4. Risk management matrix

4 Stakeholder Interaction Register

A stakeholder interaction register has been established by the PMU. The purpose of the register is to effectively record all interactions with stakeholders, whether in person, by phone/SMS, email, or social media to ensure accurate prompt, appropriate follow-up. It will also provide easy access to engagement records for reporting purposes.

The stakeholder interaction register does not replace the GRM but ensures that interactions such as requests, feedback suggestions, comments or information given or received from stakeholders and that are not grievances are recorded and proactively followed-up and addressed. A template of the Interaction Registry Form is provided in Appendix B.

A copy of the stakeholder Interaction Form and Interaction Registry are shown in Appendix B.

4.1 Disclosure

The Interactions Registry will be disclosed along with the GRM to both communities and through regular safeguards reporting to ADB.

APPENDIX

A

GRIEVANCE RECORD FORM AND
ACKNOWLEDGEMENT RECEIPTS



Sustainable and Climate Resilient Connectivity Project



Grievance Redress Registering and Monitoring Form

Grievance Case Number

Instructions: complete ALL information
in the grey shaded spaces.

Complainant Information

1 Full Name (or Anonymous):

2 Address:

3 Gender Male Female 4 Age years old

5 Telephone 6 Email

7 Type of grievance Affected person/s Intermediary (on behalf of the Affected Pers.)
 Civil organisation (e.g. community, council, etc)
 Others (specify)

Complaint Details

8 Mode of receiving grievance
 Verbal Telephone call Text message Letter Email
 Others (specify)

9 Location of problem/issue specified in complaint:
 Location (Relocation Zone) Other - District
 Location (outside Relocation Zone)

10 Type of problem/grievance:
 Construction impact Employment
 Construction nuisance (noise, dust, lights...) Other

Grievance details

11 Detailed description of grievance/problem:

[Redacted text area for detailed description of grievance/problem]

12 Complainant signature in agreement with description of the grievance

[Redacted signature area]

13 Proposed resolution by the complainant

[Redacted text area for proposed resolution by the complainant]

Person receiving and recording the grievance

14 Name [Redacted]

15 Position [Redacted]

16 Date [Redacted] 202[Redacted]
dd mm y

17 Time complaint was made [Redacted] : [Redacted] PM/AM

18 Signature [Redacted]

Grievance investigation

19 Action 1

Actions taken [Redacted]
[Redacted]
[Redacted]
[Redacted]

20 Name of Action Officer [Redacted] 21 Date [Redacted] [Redacted] 202 [Redacted]
dd mm y

22 Action 2

Actions taken [Redacted]
[Redacted]
[Redacted]
[Redacted]

23 Name of Action Officer [Redacted] 24 Date [Redacted] [Redacted] 202 [Redacted]
dd mm y

25 Update provided to claimant Yes No

26 Action 3

Actions taken [Redacted]
[Redacted]
[Redacted]
[Redacted]

27 Name of Action Officer [Redacted] 28 Date [Redacted] [Redacted] 202 [Redacted]
dd mm y

29 Update provided to claimant Yes No

30 Action 4

Actions taken [Redacted]
[Redacted]
[Redacted]
[Redacted]

31 Name of Action Officer [Redacted] 32 Date [Redacted] [Redacted] 202 [Redacted]
dd mm y

Grievance resolution

33 Describe resolution of the grievance

[Large greyed-out text area for describing the resolution of the grievance]

Complainant satisfaction with the resolution of the grievance

34 Name [Greyed-out text box]

35 Signature [Greyed-out text box]

36 Date [dd] [mm] 202[yy]
dd mm y

Grievance closure

37 Grievance close date [dd] [mm] 202[yy]
dd mm y

38 Grievance closed by
Name [Greyed-out text box]


Sustainable and Climate Resilient Connectivity Project
Grievance Redress Mechanism Registry

Grievance ID	Complaint/Initiation				Complaint Details				Grievance Details				Final Status			
	1. Full Name	2. Address	3. Name of Complaint/Owner	4. No. of Complaints	5. Type of grievance (other specify)	6. Area of grievance (other specify)	7. Type of grievance (other specify)	8. Date of receiving process (other specify)	9. Location of problem/issue (other specify)	10. Type of problem/issue (other specify)	11. Detailed description of problem/issue	12. Proposed resolution by complainant	13. Name of person receiving the grievance	14. Date of receipt of grievance	15. Date of resolution	16. Date of closure

17. Date received signature (if available)	Grievance Investigator		Grievance Investigator		Grievance Investigator		Grievance Investigator		Complainant/submitter with resolution		Grievance Status	
	18. Action 1	19. Date	20. Name of Action Officer	21. Date	22. Name of Action Officer	23. Date	24. Name of Action Officer	25. Date	26. Name of Action Officer	27. Date	28. Date	29. Date

APPENDIX

B

INTERACTION REGISTRY FORM



Sustainable and Climate Resilient Connectivity Project



Stakeholder Interaction Form

Interaction Reference Number

Instructions: complete ALL information
in the grey shaded spaces.

Stakeholder information

1 Name/s 2 Surname

3 Title Miss Mr Mrs Ms Hon

4 Type: Internal (stakeholder within the Project) External - Business owner
 External - Community member External - Community organisation
 External - Government employee External - Government agency

5 Telephone 6 Email

7 Address / location

Initial engagement details

8 Date 202 9 Time : PM/AM
dd mm y

10 Mode of engagement Verbal Letter Email
 Telephone call Text message
 Others (specify)

11 Type of engagement Issue or grievance [redirected to GRM] Question
 Suggestion Proposed service Information
 Request Others (specify)

12 Engagement description

continue at the back if more space is needed

Page 1

13 Assessment & Identified action

Guidance

A. If the interaction was received by email, text or letter remember to reply and acknowledge it has been received.

B. If unsure on the options below, discuss with the Int. Safeguards Specialist TODAY.

Refer externally – If not relevant to the Project, refer to relevant authority/ entity/ organisation

Record only – No action required, record in registry for future reference

Provide response to the stakeholder – Record action in this form and update registry

Action – Record action in this form and update registry

14 PMU staff completing the assessment

Name Position

15 Name of person recording the interaction

16 Position of person recording the interaction

Interaction follow up

17 Action 1
Actions taken [Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

19 Name of Action Officer [Redacted] 20 Date [Redacted] [Redacted] 202[Redacted]
dd mm y

21 Follow up required? No Yes

22 Action 2
Actions taken [Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

23 Name of Action Officer [Redacted] 24 Date [Redacted] [Redacted] 202[Redacted]
dd mm y

25 Follow up required? No Yes

26 Action 3
Actions taken [Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

27 Name of Action Officer [Redacted] 28 Date [Redacted] [Redacted] 202[Redacted]
dd mm y

29 Follow up required? No Yes

30 Action 4
Actions taken [Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

31 Name of Action Officer [Redacted] 32 Date [Redacted] [Redacted] 202[Redacted]
dd mm y

33 Follow up required? No Yes

Interaction follow up

34 Action 5

Actions taken

35 Name of Action Officer 36 Date 202

37 Follow up required? No Yes

38 Action 6

Actions taken

39 Name of Action Officer 40 Date 202

41 Follow up required? No Yes

42 Action 7

Actions taken

43 Name of Action Officer 44 Date 202

45 Follow up required? No Yes

46 Action 8

Actions taken

47 Name of Action Officer 48 Date 202

48 Follow up required? No Yes

