

Environmental and Social Monitoring Report

Semi Annual Report
May 2020

VAN: Energy Access Project

Prepared by the Vanuatu Project Management Unit for the Vanuatu Government and the Asian Development Bank.

This environmental and social monitoring report is a document of the borrower. The views expressed herein do not necessarily represent those of ADB's Board of Directors, Management, or staff, and may be preliminary in nature.

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Semi-Annual Environmental and Social Safeguards Monitoring Report

ADB Loan: LOAN 3572 VAN

Vanuatu Energy Access Project

Period: July – December 2018

Prepared by Stantec and VPMU for the Asian Development Bank.

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ACRONYMS

ADB	Asian Development Bank
AP	Affected Persons
CLTA	Customary Land Tribunal Act No. 7 (2001)
COTA	Custom Owners Trust Account
DOL	Department of Lands
DOE	Department of Energy
DSC	Design and Supervision Consultant
ESS	Environment and Social Safeguards
IEE	Initial Environmental Examination
GoV	Government of Vanuatu
LARP	Land Acquisition and Resettlement Plan
MIPU	Ministry of Infrastructure and Utilities
MFEM	Ministry of Finance and Economic Management.
MLNR	Ministry of Land and Natural Resources
MOA	Memorandum of Agreement
RP	Resettlement Plan
RF	Resettlement Framework
SPS	Safeguard Policy Statement
USD	United States Dollars
VEAP	Vanuatu Energy Access Project
VPMU	Vanuatu Project Management Unit

1 INTRODUCTION

1.1 Background and Purpose of the Report

1. The Vanuatu Energy Access Project (VEAP) under the ADB Loan: LOAN 3572 VAN was approved by the Asian Development Bank (ADB) and Government of Vanuatu (GoV) in October 2017. Stantec New Zealand (Stantec) has been appointed to the role of design and supervision consultants (DSC to provide support to the Vanuatu Project Management Unit (VPMU) in the delivery of VEAP in July 2018.
2. The present report is the first semi-annual Environmental and Social Safeguards Monitoring Report prepared for the VEAP. It also complies with the ADB Safeguard Policy Statement (2009) and Public Communications Policy 2011 and government requirements for projects, with regards to implementation, monitoring and information disclosure.
3. This report has been prepared by Stantec to document the progress to date made by the VPMU and the DSC regarding the development of social and environmental safeguarding documentation and implementation requirements for procurement and delivery of VEAP. The project is in its Pre-Construction phase and the main safeguards activities during this reporting period have been the preparation of Initial Environmental Examinations (IEE) and the land acquisition and resettlement plan (LARP) for the project site.

1.2 Description of the Project

4. The VEAP comprises of 3 infrastructure developments:
 - Brenwe hydropower plant (BHP) construction, commissioning and transmission Line – the BHP is envisaged to provide in excess of 90% of the total generated energy for the Malekula grid through to 2040. The transmission line will connect BHP to the existing Lakatoro distribution grid on Malekula.
 - Distribution grid extensions in north west Malekula.
 - Distribution grid extensions from Turtle Bay to Port Olry on Espiritu Santo.

The 400kW, run-of-river BHP currently consists of the following elements:

- Intake structure.
- 0.8 km headrace canal.
- Forebay structure and spillway.
- 175-meter steel penstock.
- Turbine powerhouse, switchgear and transformer.
- 21 km transmission line (20 kilovolts).

- Tailrace.
 - Access roads.
5. BHP is located on the R. Brenwe in north west Malekula. The infrastructure was partially constructed in the 1990's by China Chang Jiang Energy Corp (CCJEC), however construction was never completed. The location of the new BHP is envisaged to be at the same location as the earlier abandoned BHP. To facilitate construction, access roads will need to be rehabilitated and/or constructed to the different areas of the project site. The main powerhouse access road is currently envisaged from the north west Malekula highway, along the west bank of the R. Brenwe.

1.3 National Statutory Requirements

6. Below is a list of national statutory requirements applicable to the project.

National requirements:

- Land Acquisition Act of 1992 and 2000 which establishes procedures to acquire land for public purposes or easements, including compensation for acquiring land;
- The Land Acquisition (forms) Regulations No 32 of 1994;
- Land Reform Act 35 (1980 and updated 1981, 1983, 1985, 1992, 2000 & 2013);
- Customary Land Management Act No 33 of 2013;
- Valuation of Land Act N° 22 (2002);
- Land Surveyors Act N° 11 (1984);
- Land Leases Act (1983) and Amendment (2014);
- Environmental Protection and Conservation Act 2002 (CAP 283 the Environment Act)
- Environmental Impact Assessment Regulations Order no. of 2011;
- Water Resource Management Act ;
- Vanuatu Electricity Supply Act 2006;
- Health and Safety at Work Act; Volume 47 (CAP 195);
- Preservation of Sites and Artefacts; Volume 39 (CAP 39);
- Custom Land Management (Amendment) Act No. 12 of 2014;
- Mines and Minerals Act 1986 (all quarried material must be from approved quarries only);
- Mines and Minerals Act, Quarry Permit Regulation. Order No. 8 of 2005;
- Public Road Act 2013;
- Employment (Amended) Act 2010; and
- Road Traffic (Control) Act

International obligations:

7. Vanuatu is a signatory to several international agreements. Listed below are some of the more applicable agreements to the project activities:

- The Convention on Biological Diversity (CBD); 1992;
- The United Nations Framework Convention on Climate Change (UNCCD); 1992;
- Agreement Establishing the South Pacific Regional Environment Programme (SPREP); 2005;
- Convention on the Elimination of all Forms of Discrimination Against Women

2 IMPLEMENTATION ARRANGEMENTS

2.1 Project Staffing

8. The DSC has identified the following sub consultants to assist in development of safeguarding documentation:

- International social safeguards specialist: Gerard Fitzgerald.
- International environmental safeguards specialist: Pene Ferguson.
- National social safeguards sub-consultant: Steven Tahi
- National environmental safeguards sub-consultant: Willy Missak

9. VPMU has compiled the following team members to assist in development and review of safeguarding documentation:

- VPMU National social safeguards specialist: Christy Haruel
- VPMU National environmental safeguards specialist: Alan Sewell

ADB Staff supervising the project:

- ADB Social Safeguards Specialist: Beth Carandang
- ADB Senior Environment Specialist: Jean Williams

2.2 Issues

10. VPMU safeguards capacity is limited and therefore has been increased with the International and National specialists in the DSC. As consultation efforts will increase in 2019, VPMU will need to increase the involvement of national social specialists on the team, either in-house or with the DSC.

3 ACTIVITIES AND STATUS OF SAFEGUARD COMPLIANCE

As the project is still in its pre-construction phase, safeguards activities revolved mainly around assessments and consultations with various stakeholders regarding the land acquisition. The main documents that were prepared during the reporting period were the i) Initial Environmental Examinations (IEE) and ii) the Land Acquisition and Resettlement Plan (LARP) which included the Communications, Consultations and Participation Plan (CCPP) which are in compliance with the ADB Safeguards Policy 2009.

3.1 VEAP Progress - Stantec

11. The contract was awarded in July 2018. The following documents the works undertaken by the DSC over the period July 2018 to January 2019 (6 months):

- Stantec appointed as DSC in July 2018.
- Inception site visits were undertaken in July 2018 by Robin Spittle (Transmission Specialist), Andrew Bird (Team Lead) and Peter Brown (Senior Civil Engineer) from Stantec, accompanied by Fatiaki Gibson from VPMU. Various meetings with the other project team members from GoV, VPMU and ADB were also conducted during the inception mission.
 - Site appraisals for the BHP location on Malekula and the distribution grid extensions for Malekula and Espiritu Santo were conducted.
 - The inception team noted there was a lack in background information (as built documents / topographical maps / geotechnical information), as well as understanding of the process and current position of land acquisition for the project site.
 - The team identified that the main risk to project programme is likely to be land acquisition and consents.
 - The team agreed that the project budget seemed reasonable when compared with similar projects in the region.
 - A draft report was issued for comment to VPMU / ADB.
 - A final report was issued for comment to VPMU / ADB on 14th September 2018.
- Engineering site visit was undertaken on 20th to 24th of August 2018 by Matt Shore (Principal Engineering Geologist) and Karl Wood (Structural Engineer) from Stantec, accompanied by Fatiaki Gibson from VPMU Lapi Kalmet (Malampa Provincial Council) and Walter Jonah (Local village guide/ claimant).
 - Investigations conducted into geology, existing structures, site layout and access road feasibility.
 - Site survey concluded that the SMEC feasibility assessment alignment for the powerhouse access road on the west bank of the river Brenwe was not feasible and would need to be realigned to the south. This places the road outside of the GoV 30Ha land purchase boundary.
- VPMU issue memorandum of agreement for the purchase of 30Ha of land at the project site location and agreement of land valuation from land owners in September 2018.
- Social safeguards site visit was undertaken on 3rd to 7th September 2018 by Gerard Fitzgerald, Levi Tarosa, Phillippe de Greslan (Stantec representative – Malekula) Joseph Temakon (MOE), and Christy Haruel (VPMU) accompanied on Malekula by Lapi Kemel (Provincial Government), with Malekula field guiding provided by Walter Jonah (local guide and farmer). Espiritu Santo site visit by Gerard Fitzgerald and Christy Haruel, accompanied by Apo Jaralivo (VUI).
 - Inspections of key project sites, local villages, and infrastructure on Malekula & Santo
 - Consultations with land owners and community members on Malekula.
 - Site inspections and discussions with power network specialists on Santo
 - Meetings with VPMU regarding land acquisition process and progress to date
 - Update to resettlement plan completed and draft version issued (09 November 2018) to VPMU for review and comment.
- Community liaison handouts compiled and issued to VPMU in October 2018 to assist in land acquisition and information for the local inhabitants on Malekula.

- DSC complete reference design drawing development, hydrology assessment, geotechnical assessment, structural assessment, and procure topographic survey
- Government of Vanuatu appoint Levi Tarosa as a national consultant. A conflict of interest now exists and VPMU request that the DSC appoint a new national social safeguards specialist. Levi was replaced with Steven Tah.
- Environmental safeguards site visit in planning stage in November 2019. Original international environmental safeguard specialist unavailable for current proposed project delivery dates. Replacement proposed by Stantec and accepted by VPMU:
 - International environmental safeguards specialist: Pene Ferguson
- Environmental safeguards site visit planned for week commencing 19 November 2018 is delayed due to unforeseen circumstances. Stantec propose and implement plan to ensure environmental deliverables are actioned prior to bid document submission.
- Initial review of IEE and EMP undertaken by Pene Ferguson and feedback discussion with ADB and VPMU undertaken on 26 November 2018.
- DSC prepares draft bid documents and issues to VPMU for review on 7th December 2018.
 - Entura appointed independent peer reviewer (IPR)
 - VPMU, IPR and DSC undertake site visits and review workshop (week commencing 10th December 2018) to appraise tender documentation and reference design.
- Topographical site survey undertaken week commencing 19th November. Land access issue regarding tabu land (burial ground) on the proposed powerhouse access road on the west bank of river Brenwe identified. Survey works stopped due to blocked access to land.
- Draft bid documentation review undertaken for social and environmental safeguards by DSC international specialists.
- A draft update to the IEE and EMP with identification of outstanding risk items will be issued for inclusion in EPC tender documents was issued on 16th January 2019, with final version to be updated following site visit.
- Environmental safeguards site visit was undertaken on 21st to 24th January 2019 by Pene Ferguson, Willy Missak, Karl Wood and were accompanied by Lapi Kalmet.
 - Site appraisals for the BHP location on Malekula and the distribution grid extensions for Malekula and Espiritu Santo were conducted.
 - Flow gauging of the River Brenwe was conducted at the intake and powerhouse locations, confirming inflow of water along the course of the river at the project site.
 - Meetings held with the Department for Environmental Protection and Conservation (DEPC) and Department for Water Resources (DoWR) to confirm the requirement and application processes for development consent and water use permit. VPMU confirm that DSC will support VPMU in application for consent and permit prior to EPC contract award.
 - Update to IEE and EMP underway.

3.2 Capacity Building

12. In September 2018 the VPMU contracted Ms Christy Haruel to undertake social safeguards activities on behalf of the Government. Mr Lapi Kalmet from the Malampa Provincial Government assigned to support social team work on Malekula. Local site guiding has been provided by Mr Walter Jonas. Ms Haruel's contract is due to expire in March 2019, and the Unit will be left with no specialist capacity in this area. This represents a significant immediate risk to the project, especially the Brenwe HPP, which requires sustained specialist input around land access and acquisition, livelihoods, and community consultation. It is recommended therefore that the VPMU extend Ms Haruel's contract beyond March 2019 or recruit a replacement, and if not already done, formally assign Mr Kalmet to support the work on Malekula. It is also recommended that Stantec be kept more up to date on social safeguards activities by the VPMU and be enabled to provide active support and advice to the Unit.

3.4 Land Acquisition Progress

13. Feedback of the social safeguarding site visit was given on 12th September 2018 to a teleconference attended by Stantec, ADB and VPMU project team members. The following notable points were discussed:

- All but one of the land claimants were consulted about the proposed project and required acquisition of their lands by GoV. Land ownership claims not yet resolved.
- Land acquisition process not clearly explained or followed during negotiations with land claimants.
- Local communities are not well informed about the Brenwe development. More active information provision and consultation on project effects is required.
- Dispute exists between 2 groups of claimants for the west bank land and requires mediation.
- Land claimants may need to obtain independent valuations to follow the GoV acquisition process.
- The owners of livelihoods assets (mainly cocoa, and coconut plantations) on acquired land and the proposed road access routes on both sides of the Brenwe River need to be identified, and assets inventoried.

14. VPMU have distributed community liaison handouts to Malampa Local Government in October 2019 to aid discussions regarding increasing information dissemination with the local community.

VPMU acknowledge further safeguarding visits are required to close out the issues above and plan to complete a 2nd site visit in February / March 2019. Ideally a MoU will be signed by all parties to agree land ownership claims.

15. Following the discussions, an update to resettlement plan was completed and draft version issued (09 November 2018) to VPMU for review and comment. The resettlement plan and reference design will need to be revisited and updated once west bank land access issue is resolved.

3.4.1 Implementation Schedule

16. The following implementation schedule has been replicated from the LARP.

Table 1: Implementation Schedule

N°	Activities	Progress / date completed
1	Confirmation of land requirement and consultation/information disclosure with landowners/APs	Completed
2	Land survey and valuation	Completed
3	Confirmation of landowners by the Customary Lands Management Office (CLMO)	Completed Appeal with Supreme Court for Tervaut land complete. Wiaru pending.
4	Submission to Department of Lands (DOL) of land survey report and to prepare for formal negotiation with landowners/APs and budget allocation for land acquisition	Land Survey Report submitted Valuation reported to APs
5	Negotiation with landowners/APs: consultation with affected landowners to negotiate for land acquisition/purchase.	MOA with each land claimant to proceed with project until ownership is determined (December 2017) MOA for access roads yet to be signed with landowners.
6	Agreement on land acquisition/purchase and approval by the government on allocation and release of fund for land compensation payment	Valuation done and given to land claimants. 1 claimant lodged objection to valuation.
7	Vanuatu Project Management Unit (VPMU) in coordination with Department of Energy (DOE) and DOL updates the LARP including agreements on compensation rates with landowners and discloses updated LARP to APs.	September 2017, September 2018, and ongoing
8	VPMU submits the updated LARP to ADB for approval and posting on ADB website	Last updated February 2019 and next update is for May 2019
9	Execution of land acquisition and payment of compensation	Compensation to be lodged in Customary Owners Trust Account (COTA) pending land ownership determination. Claimants advised.
10	VPMU submits to ADB a land acquisition and compensation completion report	Process not yet complete
11	VPMU submits safeguard monitoring report	May 2019

3.4.2 Recommended key activities for the next phase

17. Work completed to update the LARP: update undertaken by Stantec following September 2018 social safeguard team visit. Stantec international consultant not kept advised by VPMU about work or progress since. No progress on the draft LARP since September 2018. VPMU and GOV continues to work on resolving Brenwe HPP land ownership and access issues.
18. Work needed for next 6-12 months on social impacts and social safeguards.
 - GOV to complete land acquisition of required lands, and settle compensation package.
 - GOV /VPMU to establish formal agreements with owners of land and owners of assets on proposed site access routes outside of acquired area
 - VPMU to undertake additional consultation with local communities -, including project awareness, consultation on impacts and opportunities, impacts management, benefit sharing.
 - VPMU, Roads and other relevant agencies to initiate consultations with local communities on transmission lines corridors, infrastructure placement, and transmission construction impacts and their management.
 - Update of Brenwe HPP land acquisition and livelihoods plan, with follow-up consultations with APS.
 - Begin an assessment of the environmental and social impacts of the Santo network extension.

3.4.3 Issues

West Bank Tabu Land

19. During topographical survey of the proposed powerhouse access road alignment through plantation on the west bank of the Brenwe, a local person/s identified that a section of the land due to be surveyed was tabu due to sacred sites / burials in the area. Access was not permitted, and the survey works abandoned. No issues were raised previously during numerous site visits and land consultations between VPMU/ GoV/ Stantec and land claimants.
20. VPMU are currently trying to ascertain the validity of these claims and mitigate the issue accordingly. Stantec have advised that the alignment can be moved to suit land acquisition boundaries supplied by VPMU following VPMUs conclusion of the tabu issue. If a new alignment is required, this will lead to additional assessment of the impacts of the alternative route, questions of land ownership and livelihood asset ownership and compensation.
21. VPMU plan to investigate and address the land access issues and agree a revised alignment with the land owners in their 2nd site visit, ideally resolving with a MoU signed by all parties (refer to Section 3.4) Stantec will then review the reference design and bid documents and update accordingly.

3.4.4 Questions of land and asset ownership

22. This process has been running for some time. Land and asset owners need more information and clarity on the acquisition and compensation process – whether it be by MOU, lease, or formal acquisition. Lack of resolution of ownership questions create risks of local conflict, perceived

injustices, and potential distrust of government and government officers/agencies - which are a risk to the project.

23. The above relates to the access roads that fall outside of the 30Ha boundary previously purchased by GoV for the scheme. Access roads will be required to cross claimant land from the public highway corridor to the 30Ha boundary.
24. Agreement will be sought by VPMU on their 2nd site visit (refer to Section 3.4) for either agreeing purchase of the land or lease agreement. This is envisaged to be recorded in an MoU.

3.4.5 ESS Capability

25. VPMU/GOV needs to address the issue of retaining capability in environmental and social safeguards for the VEAP, and have a long term plan for building and retaining such capability.

3.5 Environmental Assessment Progress

3.5.1 Commentary on key activities completed or in progress.

26. The IEE for Brenwe Hydropower Plant and associated transmission and distribution lines is currently being updated. The first draft has been completed.
27. At the time of writing this report in February 2019, several site visits had been conducted in the week of 21 January 2019 and included below:

Monday 21 st January 2019	<ul style="list-style-type: none"> ○ Stantec team Travelled to Santo, Met with concessionaire, VUI, and visited transmission line route. ○ Traveled to Malekula
Tuesday 22 st January 2019	<ul style="list-style-type: none"> ○ AM – Stantec team and Malampa representative visited transmission and distribution line route to Lambubu plantation and Lakatoro concessionaire compound / diesel generation facility. ○ PM – Stantec team and VPMU/ Malampa representative visited Brenwe HPP project site for appraisal and river flow gauging.
Wednesday 23 st January 2019	<ul style="list-style-type: none"> ○ AM - Stantec team traveled to Efate. ○ PM- Stantec team met with VPMU team to discuss site visit findings and project progress.
Thursday 24 st January 2019	<ul style="list-style-type: none"> ○ All day –24th January 2019 Stantec and VPMU teams held meetings with GoV; DEPC, DoWR, Department of Women’s Affairs

28. Work in the next 6-12 months (2019):

Early February	Complete IEE for Brenwe and Malakula Transmission and Distribution Lines for Bid Documents
Mid February	Complete IEE for Santo Distribution Line extension for Bid Documents

Early March	Apply for and obtain water works permit and development permit from Govt. of Vanuatu.
April/May	Evaluate Contractor's safeguards capacity in their tender response.
Quarter 3	<ul style="list-style-type: none"> • Inductions to VEAP safeguards to Contractor (awareness raising and introductory training) • Update IEEs following detailed design presented by Contractor. • Review Contractor's CEMP and work with Contractor to complete CEMP satisfactory to ADB and Govt of Vanuatu.

3.5.2 Issues

29. Currently working to validate the appropriate environmental flow, which may impact on operational regime in the future. The original proposed environmental flow of 10% of mean flow was based on a 'rule of thumb' which is relevant for a different type of river system. This river system has a large amount of base flow, and the low flow does not vary much from the average flow. This will be concluded in the updated IEE.

3.6 Environmental Incidents

30. None to report. No physical works.

3.7 Health and Safety Incidents

31. None to report.

4 Grievance Redress

32. A grievance Redress mechanism has been put in place for the pre-construction and construction phase. Details of the process are outlined in the Communications, Consultation and Participation Plan included in the LARP. Statistics of complaints received and managed:

Total number received in 2018	2
Total number closed out in 2018	1
Total number still open as at Dec 31, 2018	1

33. The main grievances received were:

1. The letter written by a representative of an affected family, who resides in Vila to the Department of Lands acquiring officer. The family was not agreeable with the valuation amount and questioned the valuation process. Department of Lands replied to the letter to the representative and also sent copies of the letter to the other two claimants. Malampa regional government confirms they have closed out the issue.
2. The landholders of the west bank prevented the Stantec surveyors from surveying the proposed access road through the west bank to the power house, because of an ancestral burial ground which was located in the way of the access road. The landowner refused for the surveyors to traverse through the area as it is considered 'taboo'. The grievance was reported to VPMU and VPMU, DoE discussed the issue in January 2019 and decided that the old Chinese road would be the only option on the west bank, to be used as the access road to the power house. VPMU to confirm acceptance of land claimant for Chinese road alignment during 2nd site visit to close out grievance and update the LARP accordingly.

5 Stakeholder Consultations

5.1 Summary of consultation with stakeholders over the reporting period

34. VPMU have led a number of consultations in both Malekula and Santo, supported by Stantec

5.1.1 VPMU consultations:

22 nd August 2018	<ul style="list-style-type: none"> • Site consultations and subsequent Memorandum of Agreement between GoV and land claimants completed for land acquisition of the 30Ha land boundary at the Brenwe HPP project site.
29 th October 2018	<ul style="list-style-type: none"> • Site consultations and subsequent Memorandum of Agreement between GoV and land claimants completed for land acquisition of the 30Ha land boundary at the Brenwe HPP project site.
15 th December 2018	<ul style="list-style-type: none"> • Consultations with land users/ land claimants owning gardens along the proposes access roads • DoL consultations

5.1.2 Stantec consultations:

5.1.2.1 Social safeguards visit itinerary:

Monday 3rd September 2018	<ul style="list-style-type: none"> ○ Meeting of ADB, VPMU, DOE and in country Stantec team at ADB offices, Port Vila
Tuesday 4th September 2018	<ul style="list-style-type: none"> ○ PM – Stantec team and VPMU/ Malampa representative meet SG Malampa Province and government officers. Meeting with Tervaut landowner-claimants. Meeting with affected people and Chief.
Wednesday 5th September 2018	<ul style="list-style-type: none"> ○ –AM Meeting with the Chief, landowner representative, Waiaru village ○ PM visit to site and the features that is accessible. Meeting with

	land claimant for east bank land, Brenwe village.
Thursday 6th September 2018	<ul style="list-style-type: none"> ○ AM Discussions with land claimant representative and other local stakeholders. ○ Drive transmission route – Leviamp, Brenwe Village, Unmet, Lambubu, Lakatoro.
Friday 7th September 2018	<ul style="list-style-type: none"> ○ AM – Discussions with Malampa custom land officers. Discussion and report to SG Malampa Province. Travel to Luganville ○ PM – Drive Santo transmission extension line route with Mr Apo Jaralivo of VUI (concessionaire). Discussion with VUI power station manager (Jeremy Gideon) and others, Port Olry.
Monday 10th September 2018	<ul style="list-style-type: none"> ○ AM – Meet with VPMU, Debriefing and discussion with Johnson Wabaiat of VPMU.

5.1.2.2 Environmental safeguards visit itinerary:

24 th January 2019	Stantec and VPMU teams held meetings with GoV; DEPC, DoWR, Department of Womens Affairs
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5.2 Summary of consultation plans with stakeholders over the next year.

35. The Communications and Consultation Plan needs to be updated to reflect the pre-construction phase and construction phase of the project, in the Brenwe area, along transmission line and at distribution line destinations. VPMU will update the existing CCP with review/ support from Stantec.

5.3 Issues

36. VPMU capacity as discussed above to have adequate support to update and implement the CCP, either in house or through amending the DSC TOR.

6 Summary and Conclusions

37. The DSC is working closely with VPMU to achieve a high level of consultation and agreement with the community on the proposed Project works. The key outstanding issue is to ensure the government continues to facilitate land acquisition and compensation for the project site and access roads. This includes facilitation of the MOA signing process for the access roads and the engagement of a Third Party Validator (TPV). It is essential that the Communications, Consultations and Participation Plan is implemented at all stakeholder levels throughout all phases of the project.