



PROJECT PREPARATION ADVANCE (PROPER)

STAKEHOLDER ENGAGEMENT PLAN

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Document history

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Abbreviations and Acronyms

CPMO	Tuvalu Central Projects Management Office
EHS	Environmental Health and Safety
ESF	Environmental and Social Framework (World Bank)
ESS	Environmental and Social Standard
GBV	Gender based violence
GRM	Grievance Redress Mechanism
IA	Implementing Agencies
IDA	International Development Association
OHS	Occupation Health and Safety
PAP	Project Affected People (Parties)
PMU	Project Management Unit
PPA	Project Preparation Advance
PROPER	Pacific Islands Oceanscape Program for Economic Recovery and Resilience
TOR	Terms of Reference
TFD	Tuvalu Fisheries Department
UNCRC	United Nations Convention on the Rights of the Child
WB	World Bank

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1 INTRODUCTION

Tuvalu Fisheries Department (TFD) through the Ministry of Finance has requested a Project Preparation Advance (PPA) from the World Bank/International Development Association (WB/IDA) that will be used to prepare future WB/IDA projects under funding for IDA 20. The funds will be used to prepare environmental and social risk management instruments, recruit staff for Project Management Units (PMUs) and engage short term consultants (individuals and firms) for inputs specifically related to project design and preparation. TFD will apply to draw down on the fund as and when required.

Activities to be undertaken under the PPA funding are required to comply with the World Bank's (WB) Environmental and Social Framework (ESF)¹. The Environmental and Social Standards (ESSs) within the ESF that are considered relevant to the PPA and are:

- ESS1 Assessment and Management of Environmental and Social Risks and Impacts
- ESS2 Labor and Working Conditions
- ESS10 Stakeholder Engagement and Information Disclosure.

As such the following Safeguards instruments are required:

- Environmental and Social Commitment Plan (ESCP - ESS1, 2 and 10)
- Stakeholder Engagement Plan (SEP- ESS10).

This document provides the Stakeholder Engagement Plan (SEP) to facilitate planning and implementation of the PPA.

2 SUMMARY OF EXPECTED ENVIRONMENTAL, SOCIAL, HEALTH AND SAFETY IMPACTS

The financing will be used to develop the PROPER Project. The activities for which PPA is provided are generally administrative, principally office based with limited in-country site visits. These activities do not have external or third-party impacts, with the principal Environmental and Social risks relating to Occupational Health and Safety (OHS) and employment/recruitment risks relating to Labour Management. This development will be confined to the establishment of the Project Management Unit (PMU) and professional services for the preparation of technical documentation.

Key activities are likely to include:

- Engagement of consultants to complete technical studies and stakeholder engagement activities to support project preparation and appraisal
- Recruitment of PMU staff during project preparation (safeguards, financial management, procurement and project management positions)
- Potentially procurement of goods to support PMU set up (e.g., office space and equipment)

3 STAKEHOLDER ENGAGEMENT ACTIVITIES PRIOR TO DEVELOPMENT OF

¹ 2016. World Bank Environmental and Social Framework. World Bank, Washington, DC.

THE SEP

There have been consultations during the project design phase of the TFD proposal for PROPER but no disclosures have been undertaken to date. This SEP will be disclosed on the TFD Implementing Agency (IA) website and the CPMO website if possible.

4 OBJECTIVES OF THE SEP

The ESF ESS10 recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

The objects of ESS10 are:

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular with project-affected parties (PAPs).
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.

This SEP content will outline the consultation and engagement activities for the PPA funded activities. The Project will develop a separate SEP for implementing the full project with its component activities prior to Appraisal.

5 STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder analysis determines the likely relationship between stakeholders and the project and assists to identify the appropriate consultation methods for each stakeholder group during the life of the project. The following four groups of stakeholders are identified for this project:

- Project implementation Partners
- People or groups likely to be affected by the project (PAPs);
- Other interested parties that may have an interest in the project, for example other organisations working on similar issues.
- Vulnerable or disadvantaged people.

The identified groups are further described in Table 1. Stakeholder identification and analysis will continue throughout project preparation and will remain flexible and dynamic in its

approach.

Table 1 identifies the key stakeholders within each group and the type of engagement that is required.

5.1 Project Partners

Project implementation partners are defined as stakeholders that contribute to the execution and implementation of the project. Project partners identified for the PPA are:

- Government Ministries, Departments or Agencies
- Non-Government Agencies (International, National, and community NGO's etc)
- Other development partner donors

5.2 Project Affected People/Parties (PAPs)

A number of PPA related activities will set the direction for investment and will potentially have direct or indirect impacts on communities and citizens. To mitigate the risk of adverse impacts and maximise the appropriateness of the investments and benefits, stakeholder engagement will need to commence as soon as practicable, involving stakeholders early on in all PPA funded studies and technical advisory stages, and adopting culturally appropriate and effective consultation techniques.

Table 1 PPA Key stakeholders

Groups	Organisation	Type of consultation/engagement
Project Partners		
Ministries	Fisheries & Trade	Interviews with formal consultations
	Home, Lands & Environment	Interviews with formal consultations
	Finance & CPMO	Interviews with formal consultations
NGOs	Private Sector, TANGO,	Interviews with formal consultations
Other Development Partners	GEF	Formal consultation – virtual platform
	ADB	Formal consultation – virtual platform
	NZAID	Formal consultation – virtual platform
PAPS		
Island communities	All islands	<ul style="list-style-type: none"> - TFD site visits and face to face consultations with the on all outer islands coordinated by the kaupule. - Separated face-to-face consultations with women and young people at an island level. - Consultation with local community based organisations, e.g. youth groups and women's faith based organisations. - Face to face discussions with national disability organisations

Groups	Organisation	Type of consultation/engagement
Fishers nearshore / coastal / offshore	All islands	<ul style="list-style-type: none"> - individual interviews with island-level leaders and leaders with secretaries of fisher organisations. - Group discussions with fishers at island level - if present, womens fisher representatives, national fisher representatives.
Disadvantaged and vulnerable groups		
All	Non identified	Disclosure on IA and CPMO websites

5.3 Disadvantaged/Vulnerable Individuals or Groups

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

There are two distinct risks with respect to vulnerable people as defined in *World Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups*, namely risks of disproportionate negative impacts on vulnerable people, and risk of project resources and benefits not reaching vulnerable people.

As at this stage, it is not possible to identify specific disadvantaged or vulnerable people, however during all PPA funded Project activities attention will be given to ensure the inclusion of women, the elderly, youth, the disabled, and other vulnerable members of society such as households with high existing climate change vulnerability, in any stakeholder engagement.

Table 1.1: Specific engagement needs of identified disadvantaged or vulnerable groups

Stakeholder Group	Characteristic	Specific Needs
People with a disability	Have core activity restrictions that often require support or removal of barriers to participation.	Accessible meeting spaces and information presented in an accessible manner: visual, audio, graphics, plain language, graphical, etc.)
Youth	Under 18's male and female	<ul style="list-style-type: none"> - Time meetings to accommodate household chores and/or agricultural duties. - Meeting locations and format should enable young people, particularly young women, to be free to voice opinions openly, namely

		<p>that there are no cultural/customary protocols that may limit free expression.</p> <ul style="list-style-type: none"> - If engagement is required on sensitive topics, the engagement medium and format and should ensure privacy and confidentiality.
Economically disadvantaged	People living on land they do not have legal right to – extent unknown	<ul style="list-style-type: none"> - Dedicated meeting for the economically disadvantaged (if identified on the island) to provide the space to provide their views. - Provide honorariums to cover travel costs and a light meal.
Women	<p>Women are more likely to experience limitations (self imposed or otherwise) on participating in additional community activities in addition to household, work and family commitments.</p> <p>Constraints on participating in meetings that conflict with household duties.</p> <p>Socially isolated women may have limitations on participation in community activities, e.g., by coercive/controlling partners.</p> <p>Women are also at higher risk of family violence, and SEA/SH.</p>	<ul style="list-style-type: none"> - Select meeting timing that accommodate/do not clash with women’s existing workloads, both unpaid domestic work and paid work. - Meeting locations and format should enable women to be free to voice opinions openly, namely that there are no cultural/customary protocols that may limit free expression. - If engagement is required on sensitive topics, the engagement medium and format and should ensure privacy and confidentiality. Child care is available. - Outreach by women’s groups (e.g. TNCW) to include participation of potentially socially isolated women.
Those vulnerable to climate-related disasters	Live along the exposed ocean side of the islands in areas prone to inundation.	Ensure that individual invitations to these APs are hand delivered and encourage attendance at scheduled sessions.

6 STAKEHOLDER ENGAGEMENT

The PPA is essentially advance funds to prepare for the preparation and may also include the implementation of new projects activities under new funding. As described in Section 2, PPA activities are restricted to the establishment of PMU and some technical studies. This SEP will focus on all PPA stakeholders' engagement activities. A separate SEP will be prepared for the full project prior to Appraisal.

6.1 Purpose and Timing of Stakeholder Engagement Program

The purpose of this PPA stakeholder engagement is to disclose information and raise awareness about the project is being prepared under PPA funding and to facilitate input and advice from key stakeholders.

This SEP will facilitate the following:

- Create and maintain confidence and trust
- Establish local awareness and understanding
- Facilitate key stakeholder group participation where necessary in the process
- Provide avenues for grievance redress.
- Disseminate and disclose of results and lessons learnt to stakeholders

Table 2 below details the engagement activities that are required and the timing of these activities.

6.2 Roles and responsibilities

The Implementing Agency (TFD) through PMU has the responsibilities to manage all PPA activities. The IA roles is to lead planning, participate and make decisions on how these responsibilities are implemented. The role and responsibilities of PMU is to facilitate and ensure that all activities are implemented in accordance with World Bank and Government policies, procedures and processes with support from CPMO when and where needed.

The anticipated team to carry out the consultations includes:

IA (TFD)	- Director of Fisheries or representatives (Coastal/Oceanic/O&D) - TFD Advisor
PMU	- Project Coordinator - Project Environment and Social Specialist
CPMO	- Environment and Social Safeguard Specialist

Table 2. SEP Program

Timing	Activity/action	Stakeholders	Roles/Responsibilities
Month 1	- Awareness of the Project Concept + Radio programs + Formal Consultations - TFD site visit and face to face	+ All stakeholders + PAPs - Island communities - Women community and faith	IA & PMU (CPMO)

Timing	Activity/action	Stakeholders	Roles/Responsibilities
	consultation on all islands - Face to face discussion with different groups - Individual interviews with Kaupules and leaders	based women organisations - Youth - Disability, Vulnerable & Disadvantages - Fishermen Association	
Month 2	- Meetings & Workshops + Present findings and Validation - Repeat of formal consultations as above	+ PAPs - Island communities - Women community & faith based women organisation - Youth - Disability, Vulnerable and Disadvantages - Fisher (men/women) Associations	IA & PMU (CPMO)
Month 3	Disclose project instruments	WB & Government	IA

6.3 Proposed Strategy for Information Disclosure

This SEP's fundamental role is to ensure that the proposal for PPA funding be disclosed to facilitate transparency around the development of WB projects. Therefore, the SEP will focus on; **Information Dissemination, Sharing and Awareness:** To inform and update stakeholders on the PPA status, actions taken and results. This will be delivered through websites or face to face methods during discussions on activities with the various IAs. For information dissemination to community representatives, PPA will use culturally appropriate techniques that will be delivered in local languages as required. Local counterpart safeguard colleagues and/or translators are to be engaged as required.

Appendix 1 details a draft statement that will be used as an introduction to the PPA funding activities. The following documents will be added to the websites when approved by the WB:

- Environmental and Social Commitment Plan (ESCP)
- Stakeholder Engagement Plan (SEP).

6.4 COVID-19-related constraints

Tuvalu has lifted its COVID-19-related restrictions but some precautions are still in place and will be observed as set by the Tuvalu Government and the Kaupule (councils) of outer islands. The activities under the PPA will follow the requirements of the government and the Kaupule that are in place. Consultations may be undertaken face to face if cleared by island communities, if not the use of phone, email, voice or video conferencing, social media and other measures that would achieve the goals of the project.

7 GRIEVANCE REDRESS MECHANISM (GRM)

The PROP Phase 1 Grievances Redress Mechanism (GRM) is in place and will be used for any PPA related grievances. Processes for documenting complaints and concerns have been specified, including time commitments to resolve issues. The process for the GRM is detailed in Appendix 2 of this SEP.

8 Monitoring and Reporting

The Project Environmental and Social Specialist/Project Coordinator will monitor and report any issues related to any environmental and social risks/issues with the PPA.

Appendix 1: Proposed wording for PPA disclosure on IA websites

In July 2022 the Ministry of Finance requested the World Bank to advance funds for the development of new World Bank projects under the World Bank International Development Association (IDA 20). These funds are referred to as a Project Preparation Advance (PPA) and will be used to prepare documents and administrative requirements for new Projects in Tuvalu. The Ministry of Fisheries and Trade is preparing for a second phase of the PROP project which will be named PROPER (Pacific Regional Oceanscape Project for Economic Resilience). The following documents have been prepared for the approval of the PPA and are available on the links below:

- Environmental and Social Commitment Plan (ESCP)
- Stakeholder Engagement Plan (SEP- ESS10).

The funds will be used for:

- Engagement of consultants to complete technical studies and stakeholder engagement activities to support project preparation
- Recruitment of PMU staff during project preparation (safeguards, financial management, procurement and project management positions)
- Potentially procurement of goods to support PMU set up (e.g., office space and equipment)

For further enquiries, contacts are specified in the GRM contact details.

Appendix 2: Grievances Redress Mechanism (GRM)

COMPLAINTS PROCESS

Principles of the Complaints Process

- The Complaints process is for people seeking satisfactory resolution of their complaints on the environmental and social performance of the PROP project at the Tuvalu Fisheries Department (TFD) in Tuvalu.
- This Process is consistent with the Project's Environmental and Social Management Framework (ESMF) Grievance Redress Mechanism (Section VIII).
- The mechanism will ensure the following:
 - the basic rights and interests of every person affected by poor environmental performance or social management of the project are protected; and
 - their concerns arising from the poor performance of the project during the phases of design, construction and operation activities are effectively and timely addressed.

How to get in touch:

Anyone can make a complaint or grievance, ask for information on the project or get in touch for any reason. Complaints can be anonymous. The various ways to get in touch are:

- 1) By Phone: (688) 20 348 at the Tuvalu PROP Office Hours.
- 2) By email: proptuv@tuvalufisheries.tv with copy to proptuv@gmail.com.
- 3) By mail: PROP Office, Tuvalu Fisheries Department, Funafuti, Tuvalu
- 4) In person: PROP Office, Tuvalu Fisheries Department, Funafuti, Tuvalu. Give to PROP Coordinator or put in complaints/suggestion box (Fisheries Department Office or Main Government Building).
- 5) Website: www.tuvalufisheries.tv

This information, and a brief summary of the process for answering queries and managing grievances, will be published on the Tuvalu Fisheries website, or aired over Radio Tuvalu on a PROP Grievances Radio Program, or in consultation discussions particularly when involving Island Communities and other Stakeholders.

Roles and responsibilities:

The following are persons involved in the complaints process and their supporting roles and responsibilities.

- 1) Focal Point for managing the Tuvalu PROP Complaints Process: Project Coordinator for the PROP Project.
- 2) Person who will manage the database and record keeping: Safeguard Consultant for the PROP Project.
- 3) Persons who will answer simple queries and manage simple complaints: PROP Safeguard Consultant.
- 4) Persons who will manage difficult complaints or grievances: PROP Coordinator with support from the Director of Fisheries.
- 5) Person who will prepare report for World Bank reporting: PROP Safeguard Consultant through the PROP Coordinator.
- 6) Grievance Committee will be formed on an ad hoc basis for complex or significant grievance management. This will be made up of appropriate senior officials (CEO level or above) from the following:
 - a. Ministry of Fisheries and Trade

- b. Ministry of Finance and Economic Planning
- c. Ministry/Department related to the complaint;
- d. Support Team (Director of Fisheries, Safeguard and Coordinator)

The complaints process:

- 1) All complaints or grievances are entered into an assigned database that tracks progress of each complaint/grievance. Complaints records (letter, email, record of conversation) are stored together, electronically or in hard copy. Each record has a unique number reflecting year and sequence of received complaint (i.e. 2018-01, 2018-02 etc.).
- 2) Each complaint/grievance is assigned a specific person responsible for close out.
- 3) Each complaint or grievance will have a plan for addressing and closing out:
 - a. Contractor or Fisheries officer or similar project person can address issues on site as required.
 - b. If it relates to Contractor activities, the project should ensure the Contractor remedies any damage, pays compensation for damage or loss, etc.
 - c. Use of community leaders and customary methods of conflict resolution is encouraged if necessary and appropriate when an issue emerges.
 - d. If an issue/complaint cannot be resolved on site, it is elevated to the Project Manager for resolution (with support from the Safeguards Consultant). If the Project Manager and Safeguards Consultant cannot resolve the issue, it is referred to the ad hoc Grievance Committee.
 - e. If a resolution cannot be found through the Grievance Committee, the next course of action is the Court of Tuvalu or an independent mediator.
- 4) All simple complaints and grievances must aim to be closed out within 1 month. Complex complaints should aim to be closed out within 3 months or deferred to the Grievance Committee.
- 5) All complainants have the right to use the Court of Tuvalu at any time to seek resolution.
- 6) The Project Manager will make adjustments to consultations, the GRM, community engagement, project implementation and other aspects as necessary to avoid future complaints and grievances.

Reporting and Evaluation

- 1) Complaints shall be reported in the regular project reporting to the World Bank. It should contain:
 - a. Total number of complaints / grievances received
 - b. Total number resolved.
 - c. Total number under investigation / not yet resolved.
 - d. Total number not yet resolved and also exceeds the recommended close out time of 1 month or 3 months.
 - e. Short paragraph on any significant grievances currently not yet resolved and any risks to project implementation.
- 2) If there are more than 30 complaints / grievances recorded, the Project Coordinator may decide to investigate any patterns or repetition of issues that need addressing. The Project Coordinator may decide to get independent assistance to review and provide advice.

Grievance Resolution Template

Grievance Resolution Procedure Template (Illustrative purposes only)

Recorded by:	Date:
ID Number:	Location:

	Name	Representing	Contact Details
Complainant 1			
Complainant 2			
Complainant 3			
Complainant 4			

Nature of Complaint:

Resolution Action Plan:

Date	Persons Involved	Activity	Details

Satisfactory outcome? Yes No Why not?

Print Name (Complainant):	
Signed (Complainant):	
Date:	
Signed (Officer):	
Date:	

Submitted to Manager? No Yes Who?

Recorded in database as:

ID# _____