

Due Diligence Report Output 2

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Abbreviations

ADB	-	Asian Development Bank
AH	-	Affected Household
AIA	-	Addu International Airport
AP	-	Affected Person
COI	-	corridor of impact
DDR	-	Due Diligence Report
DP	-	Displaced Person
EA	-	Executing Agency
GRC	-	Grievance Redress Committee
GRF	-	Grievance Recording Form
GRM	-	Grievance Redress Mechanism
IA	-	Implementing Agency
ICEM	-	International Centre for Environmental Management
IP	-	Indigenous People
IR	-	Involuntary Resettlement
KCC	-	Kulhudhuffushi City Council
LAR	-	Land Acquisition and Resettlement
MAAW	-	Ministry of Agriculture and Animal Welfare
MCCEE	-	Ministry of Climate Change, Environment and Energy
MHLUD	-	Ministry of Housing, Land and Urban Development
MLA	-	Maldives Land Act
MMS	-	Maldives Meteorological Service
MNDF	-	Maldives National Defense Force
MRC	-	Maldives Red Crescent
PMU	-	Project Management Unit
RF	-	Resettlement Framework
RP	-	Resettlement Plan
SP	-	Subproject
SPS	-	ADB Safeguard Policy Statement (2009)
WDC	-	Women Development Committee

Weights and Measures

ha	-	hectares
m, m ² , m ³	-	metre, square metre and cubic metres
km	-	kilometre

Glossary

Affected Person (AP): Any person, households (AHs), firms, or private institutions who, on account of changes that result from the project will have their (i) standard of living adversely affected; (ii) right, title, or interest in any house, land (including residential, commercial, agricultural, forest, and/or grazing land), water resources, or any other moveable or fixed assets acquired, possessed, restricted, or otherwise adversely affected, in full or in part, permanently or temporarily; and/or (iii) business, occupation, place of work or residence, or habitat adversely affected, with or without displacement

Compensation: Payment made in cash to the project-affected persons/households for the assets to be acquired or affected for the project at replacement cost at current market value.

Cut-off Date: Means the date after which people will NOT be considered eligible for compensation, i.e., they are not included in the list of APs/DPs as defined by the census. Normally, the cut-off date is the date of the detailed measurement survey. However, this Date can be established from the date of conducting consultation and information sharing.

Displaced Person (DP): In the context of this document, displaced persons are those who are physically displaced (relocation, loss of residential land, or loss of shelter) and/or economically displaced (loss of land, assets, access to assets, income sources or means of livelihoods) as a result of involuntary acquisition of land involuntary restrictions on land use or on access to legally designated parks and protected areas. This project is not expected to create any physical displacement.

Economic Displacement: Loss of land, assets, access to assets, income sources, or means of livelihoods as a result of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to legally designated parks and protected areas.

Encroachers: The people who move into the project area after the cut-off date and are therefore not eligible for compensation or other rehabilitation measures provided by the project. The term also refers to those extending attached private land into public land.

Entitlement: Means the range of measures, comprising cash or kind compensation, relocation cost, income rehabilitation assistance, transfer assistance, income substitution, and relocation due to business restoration that are due to affected people, depending on the type and degree of their losses, to restore their social and economic base.

Household: A household includes all persons living and eating together (sharing the same kitchen and cooking food together as a single-family unit).

Indigenous Peoples: Unless they are already recognized, the Indigenous Peoples are identified in particular geographic areas based on these four characteristics: (i) self-identification as members of a distinct indigenous cultural group and recognition of this identity by others; (ii) collective attachment to geographically distinct habitats for ancestral territories in the project area and to the natural resources in these habitats and territories; (iii) customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and (iv) an indigenous language, often different from the official language of the country or region.

Involuntary Land Acquisition: The process whereby a person is compelled by a public agency to alienate all or part of the land s/he owns or possesses to the ownership and possession of that agency, for public purposes, in return for fair compensation.

Meaningful Consultation: A process that (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to APs; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

Physical Displacement: Relocation, loss of residential land, or loss of shelter as a result of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to legally designated parks and protected areas. This project is not expected to create any physical displacement.

Project: Enhancing Climate Resilience and Food Security Project.

Replacement Cost: The method of valuing assets to replace the loss at current market value, or its nearest equivalent, and is the amount of cash or kind needed to replace an asset in its existing condition, without deduction of transaction costs or for any material salvaged.

Significant impact: Significant is defined as 200 or more people will experience major impacts, which are defined as (i) being physically displaced from housing; or (ii) or losing 10 per cent or more of their productive assets (income generation).

Vulnerable: People who might suffer disproportionately or face the risk of being marginalized from the effects of resettlement and includes: (i) female-headed households with dependents; (ii) disabled household heads; (iii) poor households that fall on or below the poverty line (within the meaning given previously); (iv) landless; (v) elderly households with no means of support; (vi) households without security of tenure; (vii) households of indigenous population or ethnic minority.

Executive Summary

This document presents the Diligence Report (DDR) for Output 2 of the proposed *Enhancing Climate Resilience and Food Security Project* (the Project) of the Republic of Maldives (the Government). This DDR confirms that the physical implementation of the subproject (SP) components under Output 2 are free of permanent involuntary land acquisition and resettlement (LAR) impacts such as land acquisition, physical displacement, economic displacement, impact on livelihood, community properties or any other impacts based on a review of land registries, consultations and field visits to the proposed locations. Any temporary disturbance and impacts will be mitigated through the Environmental Management Plan (EMP).

The Project's Output 2 specifically targets pluvial and coastal flood protection in Kulhudhuffushi City in Haa Dhaalu Atoll:

- (i) Study 1: Mangrove and groundwater hydrology modeling and detailed design study;
- (ii) Study 2: Marine and coastal modeling and detailed design study;
- (iii) SP 2.1: Inland drainage network improvements, including bioswale;
- (iv) SP 2.2: Measures for the protection of the eastern shoreline.

Physical works will be undertaken for SP 2.1 and SP 2.2. The detail design of the physical works will be informed by the two modelling studies. Screening for involuntary resettlement and indigenous people impacts confirms that all the sites of Output 2 SP components are on free land and that the SP works will not cause any permanent LAR impact, direct or indirect. Possible minor temporary impacts during construction will be mitigated through the EMP. No impacts on private land, structures and livelihoods are anticipated. Kulhudhuffushi City Council (KCC) is the owner of the land. This DDR will be updated once exact locations and detail design are finalized.

Consequently, the Output 2 SP interventions fall under Category C for involuntary resettlement and Category C for indigenous peoples as per the Asian Development Bank's (ADB) Safeguard Policy Statement (SPS) (2009). This DDR confirms that the Output 2 of the Project does not trigger ADB's SPS Safeguard Requirements on involuntary resettlement or on Indigenous Peoples.

The Project will establish a simple, acceptable, transparent and effective grievance redress mechanism (GRM) tailored to the Project's needs. The GRM procedure will ensure that any compensation and resettlement programmes have been implemented accurately and fairly and will mediate conflict and avoid lengthy litigation that is inconvenient to affected persons (APs).

If any LAR becomes necessary at time of actual implementation of any of the SPs, the Project will be responsible to prepare a Resettlement Plan (RP) in line with the guidelines described in the Resettlement Framework (RF) of the Project, prepared in conformity with the ADB's safeguards requirements on involuntary resettlement, and adhering to Maldives laws and policies. The Project will make sure that all safeguard requirements are followed, and no one is disadvantaged in the process of development. The Project Management Unit (PMU) will strictly monitor the construction activities and report on any unexpected impact that may occur and will incorporate that information in Social Safeguard Monitoring Report.

I. Introduction

A. Project Background

1. Maldives' physical vulnerability and limited adaptive capacity combined with a reliance on climate-sensitive sectors such as tourism, fisheries and subsistence farming put the country at high risk to climate change and severe weather. The country is exposed to several natural hazards which may have devastating impacts such as loss of lives, injury and displacement, houses and infrastructure damage, disruption of livelihoods and services, environmental degradation, reduced economic productivity, particularly in tourism, and a potential increase in poverty and social vulnerability.

2. To overcome these challenges, the Government, with financial assistance from ADB, has prepared the *Enhancing Climate Resilience and Food Security Project* (the Project). The Project aims to support Maldives' climate change adaptation efforts, particularly in enhancing the weather observatory capacity to support informed climate decisions, safeguarding urban infrastructure from flooding and erosion, and improving agriculture and food security.

3. The Project has the following four outputs for building resilience in the island areas of two selected atolls comprising Addu Atoll and Haa Dhaalu Atoll:

- (i) **Output 1: Institutional capacity for weather monitoring, forecasting and early warning strengthened.** The project will enhance the capacity to plan, respond and adapt to climate change, through the (i) installation of a new radar system in Addu; (ii) repair of the existing radar system in Male; (iii) a pilot on agro-climate advisories; and (iv) training program for MMS on weather and hazard forecasting and early warning. Capacity building and behavioral change activities will also be conducted to maximize the effectiveness of the enhance monitoring and early warning systems at both institutional and community levels.
- (ii) **Output 2: Infrastructure and nature-based solutions for flood and coastal protection and mangrove restoration developed.** Promoting integrated flood risk management in Kulhudhuffushi City in Haa Dhaalu atoll, this output will support (i) hydrological modelling and detailed design studies to identify and design critical investments for pluvial flood mitigation, coastal protection and mangrove restoration; (ii) offshore and nearshore structures for the protection of the eastern shoreline; and (iii) improved inland stormwater drainage and filtration systems and nature-based solutions such as bioswales.
- (iii) **Output 3: Resilience and supply capacity of islands urban farming and agribusiness system enhanced.** To capacitate farmers and other value chain stakeholders on innovative climate resilient agriculture, this output will (i) upgrade the Hanimaadhoo Agriculture Center to an advanced research and advisory hub on climate smart agriculture; and (ii) demonstrate water-efficient and resilient urban and climate smart agriculture.
- (iv) **Output 4: Matching grant scheme to support adaptation innovations developed.** To build resilience of farmers and small businesses, this output will provide start-up grants to individuals, farmer groups, women development committees (WDCs), community based organizations, and small and medium enterprises, to support uptake of technologies and other measures for climate resilience.

4. The Republic of Maldives will be the borrower and the Ministry of Finance will be the executing agency. The Ministry of Climate Change, Environment and Energy (MCCEE) will be the lead implementing agency, while the Ministry of Agriculture and Animal Welfare will also be an implementing agency. Several other Government agencies will be involved in project implementation. For Output 1 the main partner will be the Maldives Meteorological Service

(MMS), under MCCEE. For Output 2, Kulhudhuffushi City Council will be engaged. Ministry of Agriculture and Animal Welfare will lead implementation of Output 3.

5. Output 1 will be implemented in Addu City atoll (Gan), Hulhulé island (Greater Malé/Kaafu), and at national level; Output 2 will be implemented in Haa Dhaalu atoll (Kulhudhuffushi City); Output 3 will be implemented in Haa Dhaalu atoll (Hanimaadhoo, Kulhudhuffushi, Nolvivaranfaru). Output 4 demonstrations will initially be implemented in Haa Dhaalu atoll (Hanimaadhoo, Kulhudhuffushi, Nolvivaranfaru) and Addu City atoll (Hulhudhoo, Meedhoo and Hithadhoo) with the potential to be scaled up to national level, while the grant mechanism will be implemented nation-wide.

6. The indicative start date of the investment project is December 2024 and the project is estimated to be completed on 30 June 2030, with the grant and loan closing on 31 December 2030.

7. The Project is financed through a grant and loan of \$23.96 million, with a government contribution of an estimated \$2.02 million.

B. Output 2 Subproject Components

8. Geographic coverage of the Output 2 of the Project is Kulhudhuffushi City in Haa Dhaalu atoll. The SP components supported under Output 2 include:

- (i) Mangrove and groundwater hydrology modeling and detailed design study;
- (ii) Marine and coastal modeling and detailed design study;
- (iii) SP 2.1: Inland drainage network improvements, including bioswale;
- (iv) SP 2.2: Measures for the protection of the eastern shoreline.

9. Two modelling studies will be undertaken to better understand the marine, coastal and groundwater hydrology, and prepared the detailed design of the physical works part of SP 2.1 and 2.2. Implementation of the SP components under the Output 2 will cover infrastructure and nature-based solutions for pluvial flood mitigation and coastal protection in Kulhudhuffushi City.¹ Stormwater drainage and filtration systems and nature-based solutions such as bioswales will be constructed for inland flood protection. Offshore and nearshore coastal protection structures will be improved to prevent overtopping and erosion.

C. Scope of this Due Diligence Report

10. The scope of this DDR is limited to the implementation of the two SP components under Output 2 of the Project. The main objective of the due diligence exercise is to confirm that the SP sites are free of involuntary resettlement impact such as land acquisition, physical displacement, economic displacement, adverse impact on livelihood, community properties or any other impacts.

11. Due diligence activities have been carried out to screen the likely involuntary resettlement impacts for interventions under Output 2. The findings from the impact screening suggest that implementation of the SPs under this output will not involve any involuntary resettlement impact. Any temporary disturbances that arise during project implementation will be mitigated through the EMP. This DDR has been prepared to confirm that the Output 2 of the Project does not trigger ADB's SPS (2009) Safeguard Requirements on involuntary resettlement or on Indigenous Peoples.

12. The DDR describes the findings of the involuntary resettlement impact screening

¹ Asian Development Bank. 2024. *Project Administration Manual: Enhancing Climate Resilience and Food Security Project*. Manila.

exercise carried out on 12-13 May 2024, involving Kulhudhuffushi City Council (KCC), Women Development Committee, coir rope making group (women), local youth, NGOs, boat owners and fishermen. Photographs of the SP locations and proposed interventions presented in this report demonstrate that the implementation of physical works will take place on land belonging to KCC free of encumbrance. Therefore, the intervention of OP2 SPs falls under Category C for involuntary resettlement and Category C for indigenous peoples as per ADB SPS (2009).

II. Social Safeguard Due Diligence

A. Scope of Land Acquisition and Resettlement

13. Physical works under Output 2 of the Project will be implemented as part of the following SPs, each of these are described below:

- (i) SP 2.1: Inland drainage network improvements, including bioswale;
- (ii) SP 2.2: Measures for the protection of the eastern shoreline.

14. A discussion on the island's mangrove and coir rope making groups is included in Section III of the report. In summary, the subprojects will not negatively impact livelihoods activities related to the mangrove systems. Subproject 2.1 will improve overall hydrology of the island, which will benefit mangrove health.

1. Output 2 Subproject 1: Inland drainage network improvements

15. Stormwater (pluvial) flooding is a major concern in Kulhudhuffushi City disrupting livelihoods and economic activity. Based on historical, city council and community observations, and as confirmed by hydrological modeling carried out as part of the Project preparation,² six pluvial flood hotspots have been identified (Figure 1):

- (i) F1: Area Southwest of the island
- (ii) F2: Area Southeast of the island
- (iii) F3: Zigzag Stadium
- (iv) F4: North of the Zigzag Stadium
- (v) F5: Area of general pluvial flooding
- (vi) F6: Area between reclaimed land and island natural area

² Asian Development Bank. 2024. *Feasibility Study on Infrastructure for Urban Flood Protection and Nature-based Solutions: Enhancing Climate Resilience and Food Security Project*. Consultant's Report. Manila.

Figure 1: Pluvial hotspot areas targeted for Project interventions

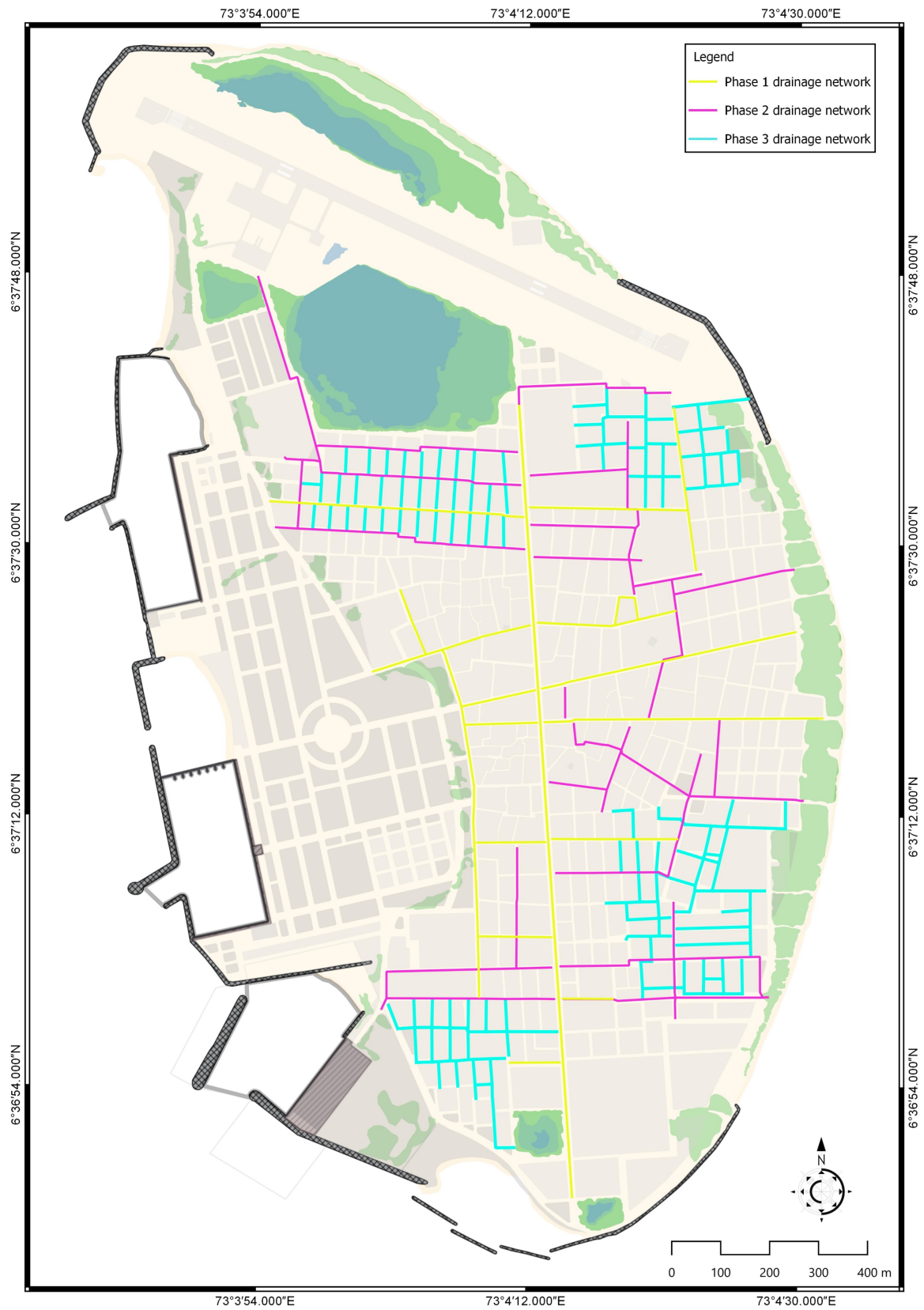


16. Kulhudhuffushi City currently has 51.09 km of roads of which 6.68 km are already asphalted, and a further 6.94 are in progress of being asphalted:

- Phase 1: 6.68 km of roads have been asphalted as part of the road phase 1 project.
- Phase 2: 6.94 km of roads are being asphalted as part of the road phase 2 project (48% completed).
- Phase 3: 37.47 km of other roads are not asphalted.

17. Kulhudhuffushi City currently has a stormwater drainage system in place for certain areas only. The measures were implemented as part of Phase 1 of the road development project (Figure 2, yellow lines). The stormwater drainage system is being expanded further alongside 90% of the ongoing Phase 2 road development works (Figure 2, pink lines), yet even with the additional drainage services provided by phase 2 drainage system, hydrological modelling showed pluvial flooding is expected to remain an issue. Phase 3 roads are those roads that are currently not asphalted, and no drainage system exists (Figure 2, blue lines).

Figure 2: Three phases of the current road and drainage network in Kulhudhuffushi City



Source: ICEM-Epoch, 2024

18. To reduce the impacts of pluvial flooding, SP 2.1 proposes an integrated set of measures for each phase of road development:

- Phase 1 roads: The current stormwater drainage system will be better connected.
- Phase 2 roads: The current and planned stormwater drainage system will be improved.
- Phase 3 roads: New drainage measures are proposed along existing non-asphalted roads.

19. The proposed measures are described for each phase below. All measures are proposed to be undertaken on public land, for which no land acquisition will be required. Kulhudhuffushi City Council has provided a letter concurring with the proposed locations, confirming that (i) the land is owned by the Council, and (ii) there are currently no impacts anticipated on private land, structures and livelihoods (Annex 1).

Phase 1 – Improved connectivity of existing stormwater drainage

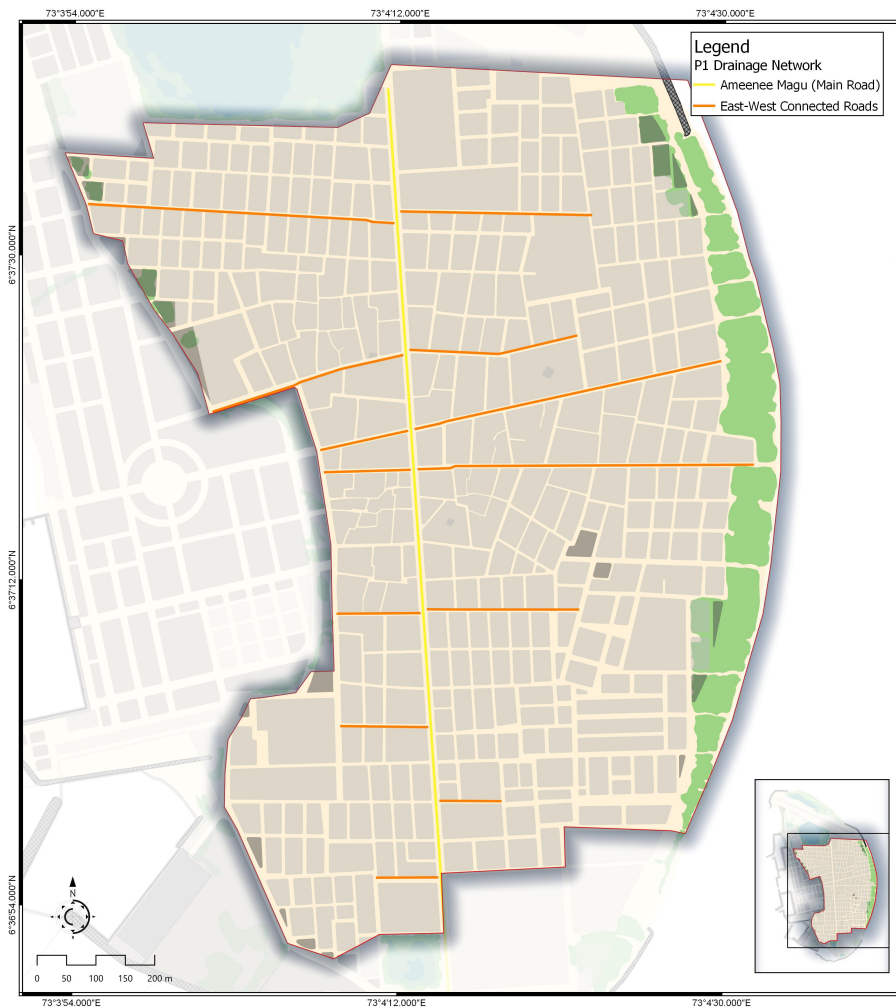
20. Figure 3 shows a representative example of an existing road developed under Phase 1. These roads are between 5–8 m wide.

Figure 3: Phase 1 road in Kulhudhuffushi City



21. The drainage lines of existing Phase 1 road are proposed to be interconnected in 13 locations to improve stormwater drainage (Figure 4).

Figure 4: Proposed interconnections between existing Phase 1 roads



Source: ICEM-Epoch, 2024

22. The rainfall-runoff modelling has indicated that some of the existing pipes within the Phase 1 stormwater drainage system are undersized and inadequate. Currently, for the Phase 1 roads, some roads have drainage systems (drain pits and conveyance pipes) installed on only one side, while others have drainage systems on both sides of the road. The roads with single-sided drainage are shown in yellow, and those with drainage on both sides are depicted in orange in Figure 5.

23. For the roads with drainage on only one side (Figure 6), it is recommended to construct additional drainage systems on the other side of the road to increase the overall capacity for the stormwater conveyance. It is proposed to provide 250 mm PVC pipes between drain pits of length 2 m, width 0.75 m, and depth 1 m, at a spacing of 10 m on the existing roads.

Figure 5: Single-sided and double-sided drainage roads on Phase 1 Roads



Source: ICEM-Epoch, 2024

Figure 6: Example of single-sided Phase 1 road



Source: ICEM-Epoch, 2024

Figure 7: Example of Phase 1 double-sided roads



Source: ICEM-Epoch, 2024

24. Currently, Kulhudhuffushi has aqua cells (Figure 8) constructed under the ZigZag stadium, located in a flooding area (F3 in Figure 9). Aqua cells function to store stormwater and slowly release it into the aquifer. However, only one road is connected to the aqua cells. The remaining nearby Phase 1 road, shown in orange color, is proposed to be connected to the aqua cell. As this road is located in a flooding area (F3 and F4 in Figure 9), it is anticipated that this connection will mitigate flooding impacts. The construction will not prohibit the use of the stadium, since the construction will take place outside the stadium, and access will not be fully cut off.

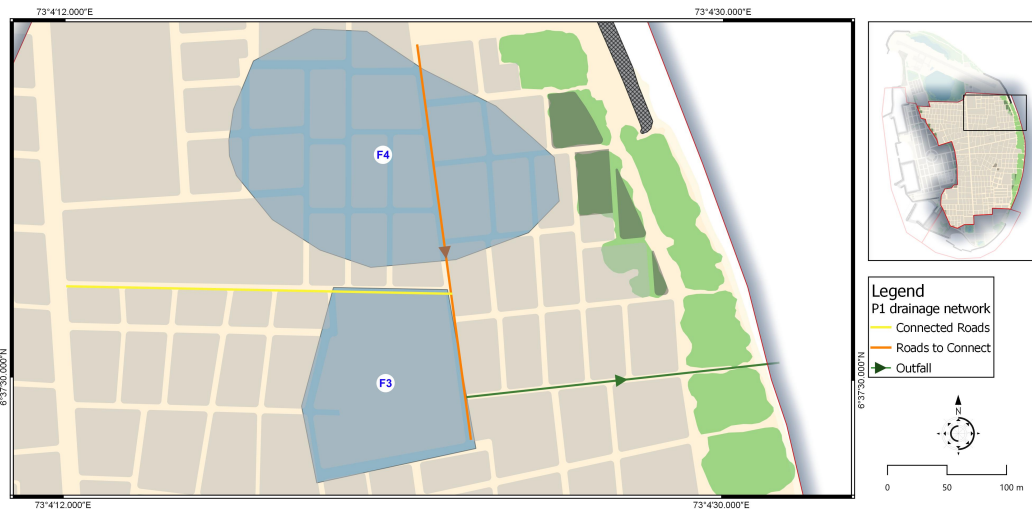
25. As there is no overflow mechanism for the aqua cell area, an overflow mechanism for the aqua cells in the form of a gravity outfall towards the eastern ridge is proposed. The dimensions of the gravity outfall and culvert are expected to be 245 m along the existing road. A schematic diagram of an outfall is provided in Figure 10.

Figure 8: Current ZigZag stadium under which aqua cells are located (left), and aqua cells during construction phase (right)



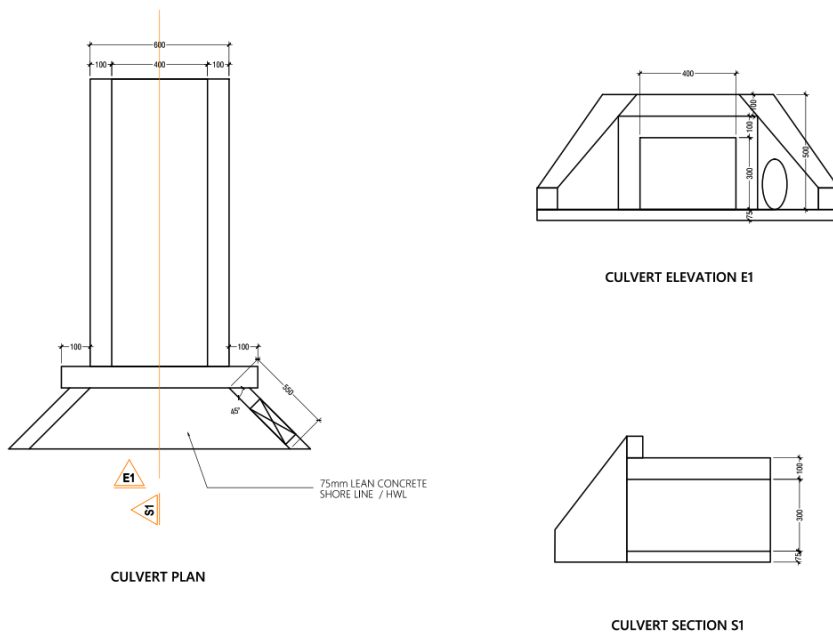
Source: ICEM-Epoch, 2024

Figure 9: Aquacells in F3 and proposed connection to road drainage system



Source: ICEM-Epoch, 2024

Figure 10: Schematic diagram of sample outfall, including plan (left), elevation (top right) and section (bottom right)



26. In summary, for the Phase 1 interventions, there will be no permanent land acquisition and resettlement impacts. The land is owned by the council (Annex 1) and the existing roads are free of encumbrance. During the construction phase, there will be temporary disturbances to traffic associated with partial road closures. This will be mitigated through the EMP, including through public information notices and creating temporary bypasses. Construction will take a phased approach to minimize disruption. Any excavation required will take place at the required distance from boundary walls of private structures, and existing utilities will be avoided. The interventions will mitigate the impacts of pluvial flooding while improving traffic flow, access to critical facilities and schools, and economic activity.

Phase 2 – Improved drainage systems

27. The stormwater drainage system associated with Phase 2 roads was previously designed to convey stormwater via gravity networks toward pumping stations. These pumping stations were designed to discharge the accumulated stormwater into the sea. The

construction of this Phase 2 stormwater infrastructure is currently underway. The roads are between 5–7 m in width.

28. It is proposed to improve this drainage system by connecting previously undeveloped roads in certain flooding areas, as a Phase 3, to this drainage system. To incorporate the additional roads, it will be necessary to increase pumping capacity to accommodate the additional stormwater flow to the Phase 2 stormwater system. Additionally, at the instances where Phase 2 paved roads intersect with the undeveloped roads (Figure 11), it is common to see ponding on the undeveloped roads.

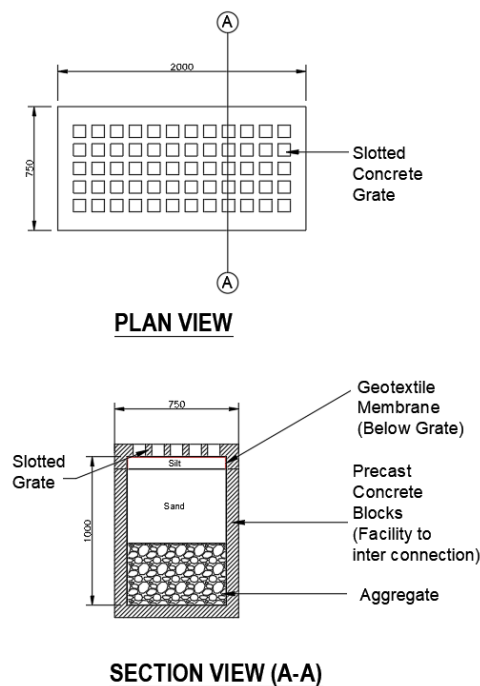
Figure 11: Samples of Phase 2 roads



Source: ICEM-Epoch, 2024

29. To prevent this accumulation of water, infiltration pits are proposed at these termination points to divert the accumulated water to the Phase 2 drainage system. There are 16 instances where phase 2 roads meet undeveloped roads, and therefore 16 infiltration pits are proposed. The average dimensions of the infiltration pits are length 2 m, width 0.75 m, and depth 1 m. A diagram of a sample infiltration trench is provided in Figure 12.

Figure 12: Plan view (top) and section view (bottom) of infiltration pit

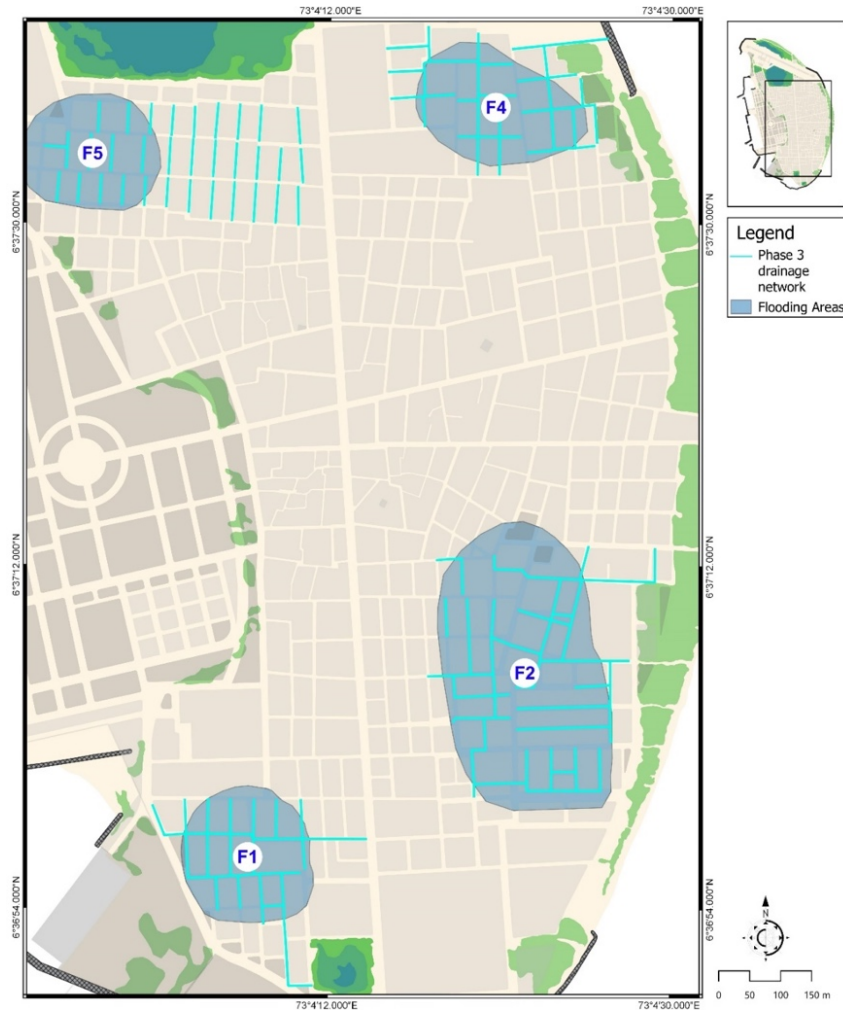


Phase 3: New drainage networks

30. As per stakeholder consultation and modelling results, new drainage networks are

proposed for the key flooding areas (F1, F2, F4 and F5 on Figure 13) where there are no existing drainage systems, and where roads are not asphalted. The proposed drainage network consists of drain pits with dimensions of length 2 m, width 0.75 m, and depth 1 m, placed at 10 m intervals and connected by 300 mm diameter pipelines. The drainage network will collect and direct the stormwater flows to the nearest bioretention cells, infiltration trenches and bioswales.

Figure 13: Proposed Phase 3 drainage systems and connections



Source: ICEM-Epoch, 2024

Figure 14: Sample roads in F1 (left), F2 (centre) and F5 (right)



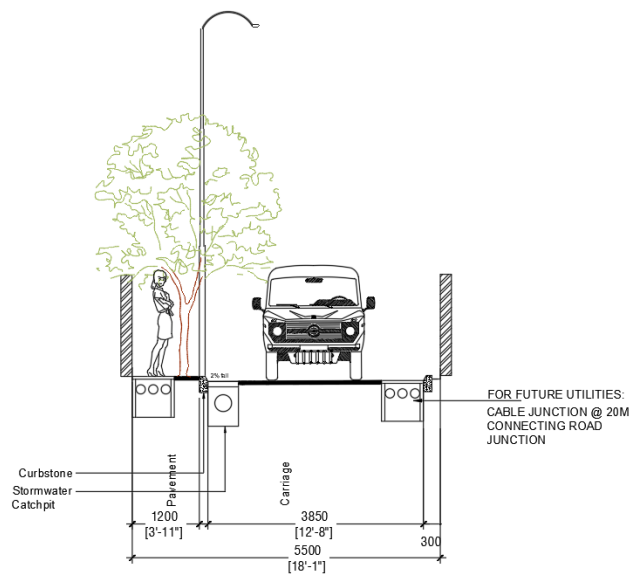
Source: ICEM-Epoch, 2024

Figure 15: Sample roads in F4



Source: ICEM-Epoch, 2024

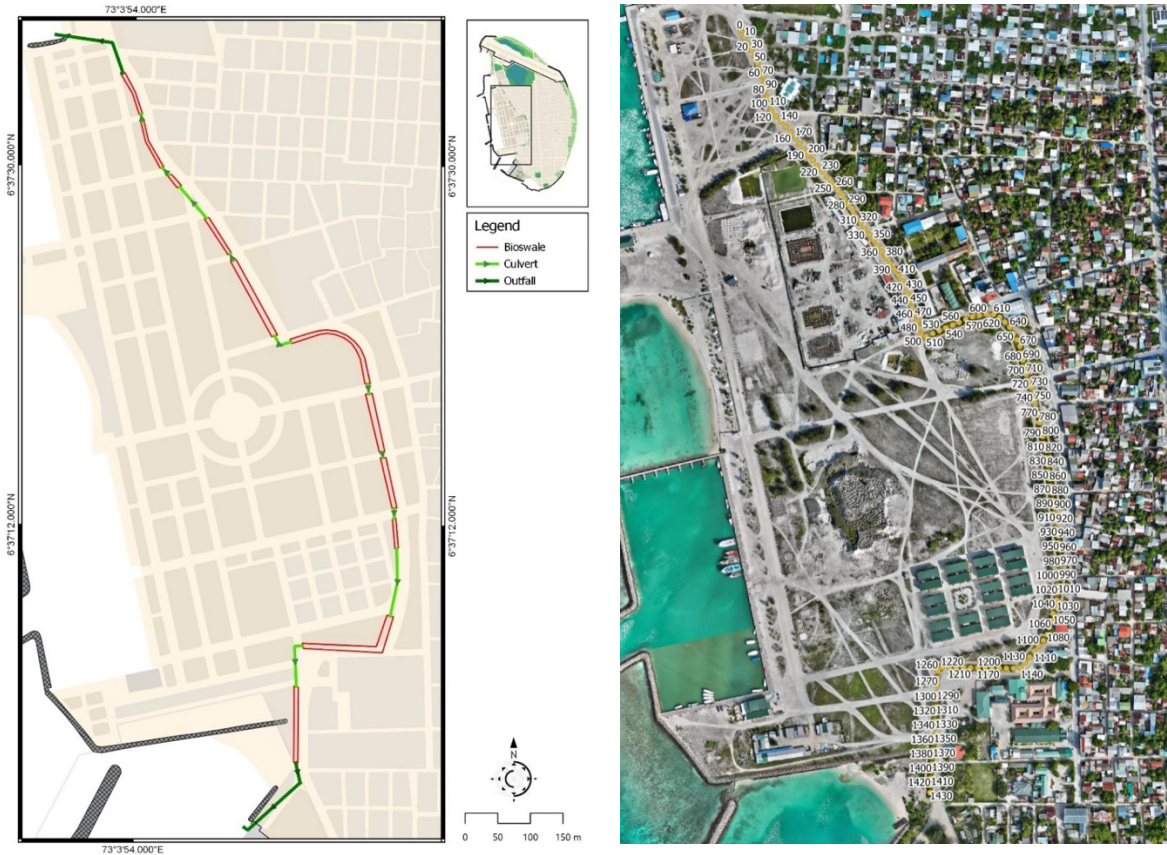
Figure 16: Typical road section and allocation for utilities and stormwater drainage



Source: Road Development Corporation, 2021

31. Under Phase 3 it is also proposed to establish bioswales or vegetative swales in the low-lying area between original island and reclaimed part of the island (Figure 17, Figure 18). Bioswale segments are connected through culverts and two separate outfalls (Figure 19) are proposed for the bioswales. The bioswale will have a landscaping component to improve the quality of public space and provide room for residents to gather.

Figure 17: Location of proposed bioswale



Source: ICEM-Epoch, 2024

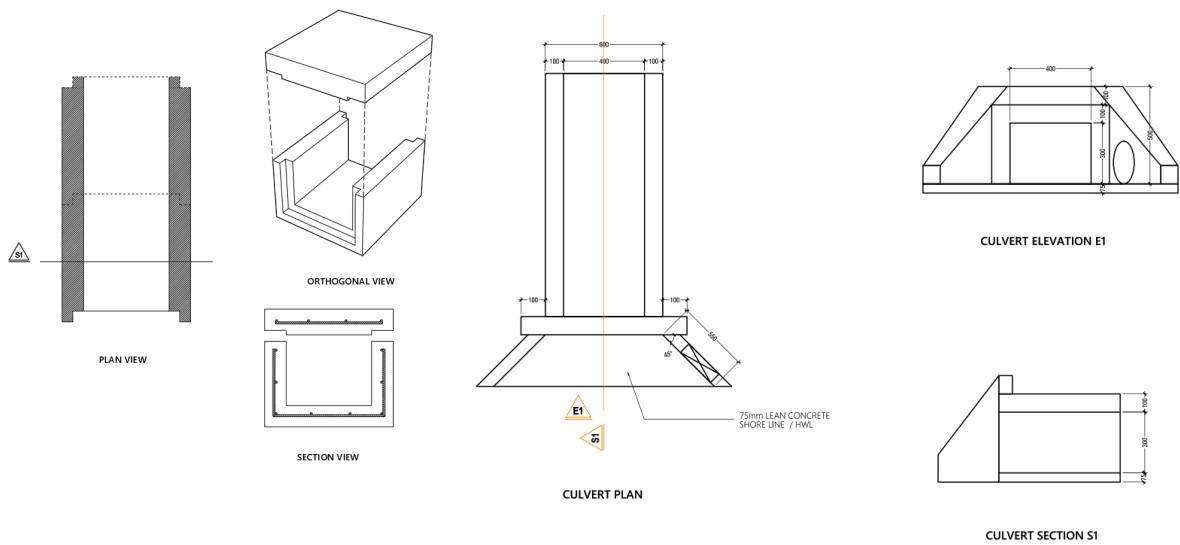
Figure 18: Existing situation at bioswale locations





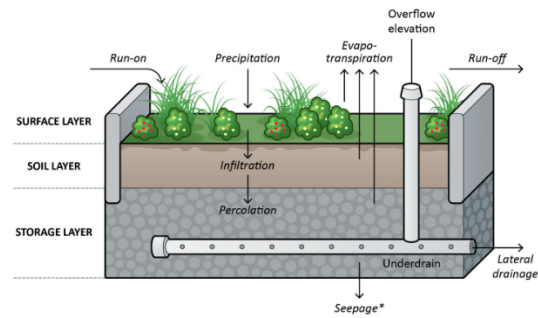
Source: ICEM-Epoch, 2024

Figure 19: Schematic diagram of culvert (left) and outfall (centre, right)



32. Three bioretention cells (nature-based solutions) are proposed to capture the stormwater runoff and to promote recharging of the groundwater. Additional outfalls will be installed to enhance the discharge of the phase 1 stormwater drainage network. It is proposed to discharge overflow from Phase 1 main road Ameenee Magu, and proposed phase 3 roads into the bioretention cell just outside the airport fence (Figure 20).

Figure 20: Sample image of location outside airport fence (left) and diagram of typical bioretention cell (right)



33. Two infiltration trenches are proposed to capture stormwater. It is proposed to discharge selected roads from the Phase 3 drainage network into the infiltration trenches.

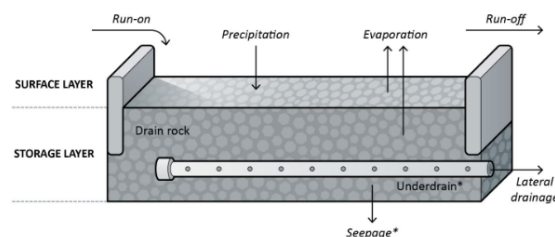
Infiltration trenches of length 175 m and 185 m are proposed in the south around the running stadium, and one of length 115 m is proposed in the east, all along existing roads, at sufficient distance from private boundary walls where applicable. Indicative dimensions of width 2 m, and depth 1 m are proposed for all infiltration trenches and will be confirmed in the detail design phase.

Figure 21: Locations of infiltration trenches east (left) and south (right)



Source: ICEM-Epoch, 2024

Figure 22: Location of proposed infiltration trench in east of island (left) and schematic diagram of infiltration trench (right)



Source: ICEM-Epoch, 2024

34. For the Phase 3 interventions, there are no foreseen permanent land acquisition and resettlement impacts. The land is owned by the council (Annex 1) and the existing roads are free of encumbrance. During the construction phase, there will be temporary disturbances to traffic associated with partial road closures. This will be mitigated through the EMP, including through public information notices and creating temporary bypasses. Construction will take place in a phased approach, so that access to docking area on the western side of the island will not be hampered during construction of the bioswale.

35. The interventions will mitigate the impacts of pluvial flooding, thereby improving traffic flow, access to critical facilities and schools, and economic activity. In addition, the improved hydrological flow will benefit the overall health of the mangrove systems (discussed in Section IV), which can provide opportunities for either livelihoods (through coir rope making) or eco-tourism, for which the latter the Council, youth and the coir rope making group expressed

interest (Annex 3). The bioswale also includes a landscaping component to improve public space and provide gathering areas for residents. If any temporary community structures are found, these will be avoided. When the detail design is completed, this DDR will be updated.

2. Output 2 Subproject 2: Measures for the protection of the eastern shoreline

36. Kulhudhuffushi City's land has an average elevation of +1.4 m above mean sea level. The island's windward eastern coastline is largely unmodified, experiencing higher wave energy due to its exposure to the open sea. This wave action has led to the accumulation of storm deposits and coral rubble, contributing to a generally higher elevation on the eastern side compared to the western side. Bedrock (*aanugandu*) is found exposed throughout the shoreline with fallen coconut trees. This is a typical indication of long-term severe erosion. The eastern shoreline does not have mangrove trees.

37. The relevant section of the eastern coastline is shown in Figure 23. The current condition of different sub-sections of the eastern coastline is shown in Figure 24 to Figure 26.

Figure 23: Satellite and drone imagery of the eastern coastline of Kulhudhuffushi city island



Source: ICEM-Epoch, 2024

Figure 24: Current status of eastern shoreline (north-east section)



Source: ICEM-Epoch, 2024

Figure 25: Current status of the eastern shoreline: south-central section



Source: ICEM-Epoch, 2024

Figure 26: Current status of the eastern shoreline: southern section



Source: ICEM-Epoch, 2024

38. There are no residential houses located immediately along the eastern shoreline. There is a school and a recreational mixed-used zone **Error! Reference source not found.** in the central section, but not directly exposed to the sea, with a narrow vegetation buffer between the buildings and the shoreline. No mangroves are present in the selected area, and no coir rope makers use the area for their livelihood activities. Fishermen do not operate on

this side of the island.

39. There is a dense band of vegetation on the eastern side of the island measured at 70 m wide in 2013, but this has reduced since due to road construction and other smaller developments. The island's coral reefs have not been surveyed extensively, especially to the east and south.

40. A revetment with a crest height of 3 m has been constructed on the northeastern side of the airport runway. A submarine communications cable arrives on the island through a concrete structure underneath the revetment (Figure 27). Along with others located around the island, the revetments are preventing island-wide circulation of sediment, causing localized scour and erosion issues.

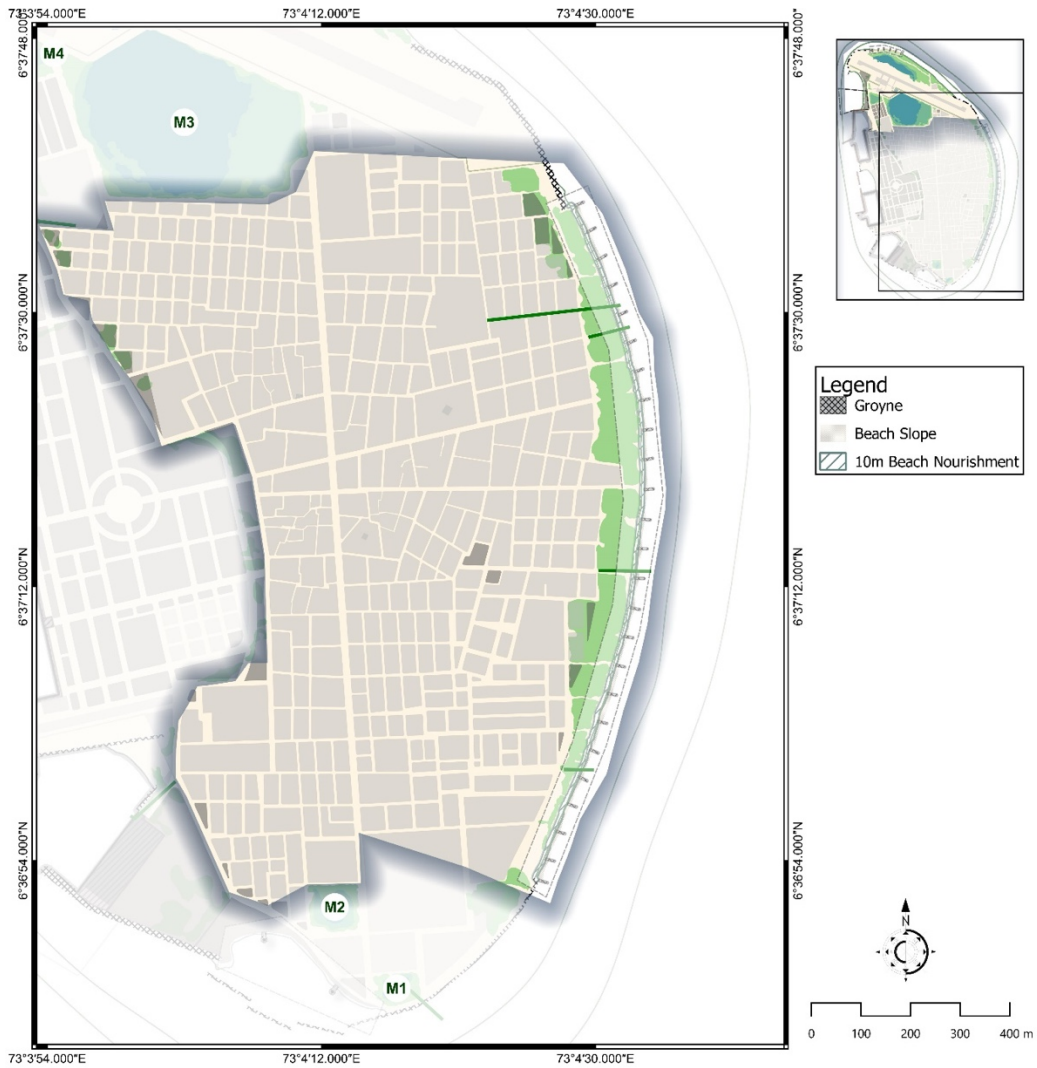
Figure 27: Submarine communications cable entering the island, under the revetment



Source: ICEM-Epoch, 2024

41. Subproject 2.2 proposes to further protect the 1,500 m long eastern shoreline from erosion and coastal flooding by nourishing the shoreline. To achieve a 7-m additional ridge crest while maintaining the current beach slope and to prevent the loss of sediment alongshore, approximately 25 groynes, each 20 m in length, are proposed. Groyne lengths can be extended to a maximum of 20 m in this region as reef flat is only 30-50 m wide across different regions. At a spacing of 60 m (3 x the length of the groyne) around 25 groynes will be required (Figure 28). The detailed design study as part of Output 2 will confirm the feasibility and appropriateness of these proposed measures.

Figure 28: Locations of proposed interventions on the eastern shoreline under SP 2.2



Source: ICEM-Epoch, 2024

42. In early 2024, the Women’s Development Committee supported the development of a new recreational area behind the vegetation on the eastern shoreline. Photos of the site are provided in Figure 29. Figure 30 shows the exact location of the recreational area.

Figure 29: New recreational area near the eastern shoreline recently constructed with the support of the Women Development Committee in 2024



Source: ICEM-Epoch, 2024

Figure 30: Location of Women Development Committee park



Source: ICEM-Epoch, 2024

43. The recreational facilities are approximately 25 m meters away from the proposed interventions under SP2.2, and will therefore not be negatively impacted. The existing facilities will be enhanced by increasing protection from erosion and linked coastal flooding the project will offer.

44. For the SP2.2 there are no foreseen permanent land acquisition and resettlement impacts. The land is owned by the council (Annex 1). During the construction phase, there will be temporary disturbances to traffic associated with road closures. Minor vegetation clearance may be required to allow access of construction vehicles and equipment, but will be avoided as much as possible. This will be mitigated through the EMP. The interventions will mitigate the impacts of coastal erosion and flooding, providing enhanced protection to existing facilities and residential areas.

B. Outcome of the Land Acquisition and Resettlement Screening for Output 2

45. Findings from the field visits suggest that the Output 2 SPs implementation works will not cause any permanent impact on private land, structures and livelihood as all physical works are proposed to be undertaken on free government-owned land (Annex 1). Works will take place at sufficient distance from existing boundary walls. During the construction phase, temporary minor disturbance may be experienced, such as temporary road closures, reduced access and minor vegetation clearance to allow access of construction vehicles. The impacts will be mitigated through the EMP.

46. The due diligence exercise has been carried out using a designed checklist to screen any potential involuntary resettlement impact due to implementation of proposed SPs under Output 2. The result of this due diligence exercise is summarized in Table 1, while the Involuntary Resettlement Impact Screening Checklists used to screen the studies, SP 2.1 and 2.2 are provided in Annex 2.

Table 1: Outcome of the LAR Screening conducted for Output 2

Issues	Remarks
Will the Project include any physical construction work?	Yes, shore protection includes potential revetments and groynes, and drainage improvements include culverts, outfalls, infiltration trenches, bioswale and bioretention cells.
Will it require permanent and/or temporary land acquisition?	No land acquisition is required.
Will there be loss of structure?	The interventions will be located at sufficient distance from existing structures such as boundary walls.
Are there any non-titled people who live or earn their livelihood at the site?	No persons are living at the sites.
Will there be loss of housing?	No
Will there be loss of agricultural plots?	No
Will there be losses of crops, trees, and fixes assets (i.e. fences, pumps, etc.)?	No major impact on crops, trees, fences, pumps, etc. Very minor to negligible impacts may be caused by the loss of vegetation at the time of shore protection works. The Project will take appropriate measures through the EMP to avoid the adverse impact by communicating prior information on the actual time of starting the physical works for SP implementation.
Will there be loss of business or enterprise?	No.
Will there be loss of incomes and livelihoods?	No. Coir rope making groups do not operate in this area and do not use the resources in this area for livelihood activities.
Will people lose access to facilities, services, or natural resources?	No people will lose access to facilities, services, or natural resources. Temporary traffic disruption may be experienced, which will be mitigated through the EMP. The island has a grid structure so diversions are easily set up. Existing utilities will be avoided.
Will any social or economic activities be affected by land use-related changes?	No social or economic activities be affected.
Are any of the affected persons from indigenous or ethnic minority groups?	No indigenous or ethnic minority groups living in the SP area.

47. The findings from the safeguard due diligence exercise confirms that physical implementation of the SPs under Output 2 of the Project:

- (i) Will not involve any permanent private land acquisition and involuntary resettlement impacts, but may involve temporary minor impacts in terms of disturbance or temporary reduced access during construction, which will be mitigated through the EMP.
- (ii) No household will be physically displaced from housing, i.e., no relocation issues involving residents or buildings in the identified locations of SP intervention.
- (iii) No agriculture, economic, cultivation and business activities are undertaken at the site.

- (iv) No household will lose any part its land holding.
- (v) No permanent adverse impact on surrounding lands and other properties, but possible temporary impacts during construction such as temporary reduced access, which will be mitigated through the EMP.
- (vi) No impact on any vulnerable or any indigenous of ethnic minority groups.
- (vii) Total area required for the SP's intervention is free and vacant land and is owned by the Government of Maldives.

48. This DDR will be updated once the detail design of the SPs is undertaken.

C. Indigenous People

49. Kulhudhuffushi City's population share similar cultural, historical and religious lifestyles. None of the population belongs to a separate and distinct cultural group. They enjoy the same rights and opportunities as the rest of the citizens in the country. They use common public facilities (mosques, cemeteries and community facilities). The Constitution of the country provides for equal rights, benefits and opportunities to its citizens.

50. The implementation of SPs under the Output 2 has no potential to affect indigenous peoples directly or indirectly. Safeguards assessment, field visits and consultations could not identify the presence of any distinctive and separate indigenous peoples in SP areas of Kulhudhuffushi City, as defined in ADB's SPS (2009), and hence, the subprojects are classified as category C for indigenous people's impacts.

III. Socioeconomic Profile of Subprojects Area

51. Kulhudhuffushi City is located 276 km north of Malé and is the capital of Haa Dhaalu atoll (Figure 31), comprised of a total land area of 2.51 km². Due to the range of health, education and transportation services available on the island, it functions as a regional hub in the north of Maldives. The island has the largest hospital in the northern atolls, several primary and secondary schools, and a campus of the National University of Maldives. Its airport and three harbours form the main passenger and cargo hub in the north. Kulhudhuffushi City is 2,610 m long and 1,425 m wide (Figure 32). The visible extent of the reef is 2,870 m long and 1,780 wide.

Figure 31: Haa Dhaalu Atoll



Figure 32: Kulhudhuffushi City in Haa Dhaalu Atoll



52. Kulhudhuffushi City had a population of 10,131 people in 2022, with 4,925 men (48.6%) and 5,206 women (51.4%), a male to female ratio of 94:100.³ The population density is 4,018 people per km².⁴ The median age of the island population is 28 years, two years below the national average. 33% or 3,081 people are 14 years or younger, and 6% or 518 people are 65 years or older. The dependency ratio is 63, slightly above the national average of 61. The average household size in Kulhudhuffushi City is 5.7 people,⁵ similar to the average of 5.8 people in atolls but above the average of 5.0 persons per household in Malé.⁶

53. Educational facilities on the island are available from pre-school to secondary level through three public schools. The National University of Maldives has a Kulhudhuffushi City campus, and there are also several private education providers including MI College, Villa College, private pre-schools, Quran classes and tuition centers.

54. Literacy rate in Dhivehi of the resident population over the age of 10 years on Kulhudhuffushi is 98.8%.⁷ Of those older than 15 years who attended school or training, the most common highest educational attainment was secondary school (44.9%), followed by primary school (23.2%). Only 4.6% proceeded to higher secondary education, while 7.6% obtained a degree.⁸

55. The economic activities and employment opportunities primarily lie with wholesale and retail trade, manufacturing, and fisheries.⁹ Civil service and public enterprises are the main employers on the island. A 2022 socioeconomic baseline survey shows that outside salaried jobs, men are often employed in construction (9%), fishing (2%), fish processing (2%) and carpentry or woodwork (2%), while women reported traditional livelihood employment (5%) such as producing a local food item, *haalufolhi* (a thin and crispy crepe-like delicacy), only made in Kulhudhuffushi City.¹⁰ Agricultural activities are performed on a small scale with crops grown in household gardens sold on the island or exported to the national capital Malé.

56. Kulhudhuffushi City holds the largest hospital in the northern atolls, multiple primary and secondary schools, and a vocational training center. As the primary hub for passenger and cargo traffic in the north, the city's harbor underwent expansion in 2021 through an ADB-financed project, facilitating bulk cargo, passenger traffic, commercial fishing, and shipping of agricultural commodities.¹¹

57. Originally consisting largely of vegetation, mangroves and reef, the island has undergone significant changes in the last twenty years. Kulhudhuffushi City had a large mangrove wetland in the north of the island (Figure 33), playing a key role in the island's ecology and biodiversity. Since the early 2000s several extensive reclamation projects and changing land use patterns have transformed the island's landscape, expanding the built-up area while encroaching on the wetlands. The airport development in 2019 provided accessibility benefits to the island but cut the original wetland into two, with no hydrological

³ Maldives Bureau of Statistics, 2022. Maldives Population and Housing Census. Provisional Results: Summary

⁴ Maldives Bureau of Statistics. 2023. *Census 2022 – Island Level Indicators Sheet*. Malé.

⁵ Maldives Bureau of Statistics. 2023. *Census 2022 Results Summary – Table H5: Average Household Size by Type of Living Quarters and by Locality, 2022*. Malé.

⁶ Maldives Bureau of Statistics. 2024. *Household Characteristics – Analysis from Census 2022*. Malé.

⁷ Maldives Bureau of Statistics. 2023. *Census 2022 Results Summary – Table ED16: Literate Population 10 Years of Age and over in Mother Tongue, Sex and Island- 2022*. Malé.

⁸ Maldives Bureau of Statistics. 2023. *Census 2022 Results Summary – Table ED19: Resident Maldivian Population 15 Years of Age and over who has ever Attended School or Training Institution by Highest Educational Attainment, and Island-2022*. Malé.

⁹ Ministry of Environment and Energy. 2013. Detailed Island Risk and Vulnerability Assessment Hdh. Kulhudhuffushi. Prepared by Riyan Pte. Ltd. for MoEE.

¹⁰ Small Island Geographic Society & Kulhudhuffushi City Council. 2022. Baseline Study on the Socio-Economic Assessment of Kulhudhuffushi City. Malé.

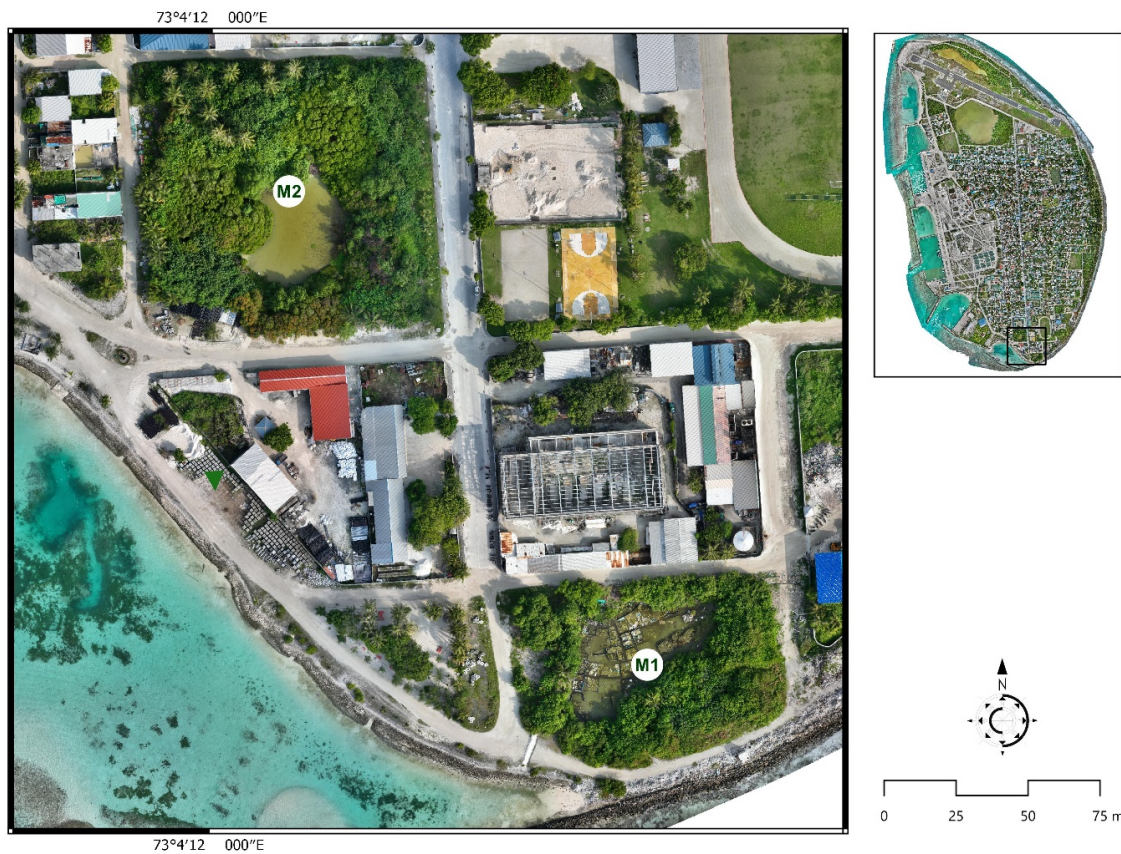
¹¹ Asian Development Bank. 2022. 36111-013: *Maldives Kulhudhuffushi Harbor Expansion Project*. Manila.

connection between them. The mangroves in the south of the island have not been altered (Figure 34) and are much smaller.

Figure 33: Northern mangrove ecosystem (M3, M4 and M5)



Figure 34: Southern mangroves (M1, M2)



58. Mangrove wetland habitats provide a “green belt” buffer zone capturing stormwater runoff and providing protection from coastal erosion and flood impacts, strong winds and salt spray. Historically, mangroves on Kulhudhuffushi City have held cultural importance and provided economic benefit of MVR 726,200 per month to 404 families through coir-rope weaving livelihoods.¹² However, since the airport development in 2019, coir-rope making activities have significantly decreased due to reduced access and quality of the mangrove, and competition from cheaper imported ropes from India (Annex 3c). Consultations with coir-rope making groups indicated that many coir rope makers have shifted to alternative livelihoods, and that they would prefer to see the mangroves restored for eco-tourism purposes (Annex 3c). Others have created dug pits near their homes to continue rope making, but this has led to mosquito issues, and the council has asked individuals to remove the dug pits (Annex 3c). KCC expressed that interventions are needed to improve the mangroves, as they are slowly being reclaimed by invasive species (Annex 3a). KCC and youth groups noted interest in a walking platform and nature park that could be used for eco-tourism (Annex 3a, 3d).

¹² Ministry of Environment. 2019. *Preliminary site survey of Kulhudhuffushi mangroves*. Malé.

IV. Legal and Policy Framework and Entitlements

59. The Maldives laws and regulations on land acquisition and ADB's SPS 2009 will form the basic principles for the project, particularly the following elements:

- (i) Involuntary resettlement will be avoided or minimized as much as possible by adopting alternative engineering solutions.
- (ii) Where involuntary resettlement is unavoidable, displaced persons will be assisted to reestablish themselves and to improve upon their pre-project living standards.
- (iii) Gender equality and equity will be ensured and adhered to.
- (iv) In case of displacement, the displaced persons shall be fully involved in the selection of relocation sites, livelihood compensation and development of alternative livelihood options during project preparation. The RP shall also be prepared in full consultation with displaced persons, including disclosure of RP and project related information.
- (v) Replacement land of equal quality shall be an option for compensation in the case of loss of land. In case of non-availability of replacement land, cash-for-land compensation will be paid to the displaced persons at full replacement cost.¹³
- (vi) Compensation for loss of land, structures, trees, other assets and for loss of livelihood and income will be based on full replacement cost, include transaction costs, and will be paid before physical displacement.
- (vii) All compensation/assistance payments and related activities will be completed prior to the commencement of civil works.
- (viii) The RP will be prepared and implemented with complete participation of local authorities.
- (ix) In the event of necessary relocation, displaced persons shall be assisted to integrate into host communities with all infrastructural facilities extended to the host communities as well as the displaced people.
- (x) Loss of common property resources will be replaced/compensated and additional community/public services will be provided to displaced persons, according to agreement between the project and displaced persons.
- (xi) Resettlement will be planned as a development activity for displaced persons.
- (xii) All displaced persons are entitled to receive compensation/assistance irrespective of title over land/property.
- (xiii) People moving in the project area after the census cut-off date will not be entitled to any compensation/assistance. In the case of land acquisition, the date of notification for acquisition will be treated as the cut-off date. For non-titleholders such as squatters and encroachers the date of census survey or a similar designated date declared by the executing agency will be considered as cut-off date.
- (xiv) Vulnerable groups (households below the recognized poverty line; disabled, elderly persons or women headed households, Scheduled Tribes/Scheduled Castes) will be identified and assisted to improve their pre-project status or their living standards to better than pre-project levels and must at minimum exceed the national poverty line.

A. Legal and Policy Framework

60. This section summarizes the legal framework for social safeguards related to

¹³ Replacement cost means the method of valuing assets to replace the loss at fair market value, or its nearest equivalent, plus any transaction costs such as administrative charges, taxes, registration, and titling costs. Where there are no market conditions, replacement cost is equivalent to delivered cost of all building materials, labour cost for construction, and any transaction or relocation costs.

involuntary resettlement in Maldives. Preparation of an RP will require that the national legal and policy framework of Maldives is reviewed and that this summary is further refined and updated as part of RP preparation.

1. Constitutional Guarantees

61. The Constitution of the Republic of Maldives is the supreme law of the land. The first written Constitution of Maldives was adopted on 22 December 1932. There have been seven Constitutions, created in the years 1932, 1942, 1953, 1954, 1968, 1997 and 2008. The current Constitution came into force on 7th October 2008.

62. Article 268 of the Constitution provides as follows:

- (i) All laws of Maldives must be enacted in accordance with this Constitution. Any law or part of any law inconsistent with this Constitution is, to the extent of its inconsistency, void and of no force and effect. The obligations imposed by this Constitution must be fulfilled. Any conduct contrary to this Constitution shall be invalid.
- (ii) The Constitution of Maldives guarantees fundamental rights and freedom to all persons in the Chapter II of the Constitution.

63. Furthermore, the Constitution of Maldives provides for powers, obligations and duties of the Parliament, the President and the Judiciary. It also provides functions and mandates of the Constitutional Bodies, those facilities to run the State smoothly and uphold the Constitution.

2. Local Councils

64. Under 230 (a) of the Constitution, the administrative division of Maldives shall be decentralised. Schedule II of the Constitution provides for list of the administrative division (known as "Atolls") in Maldives. By virtue of Article 230(b) of the Constitution, the President has the power to create Constituencies, posts, Island Councils, Atoll Councils and City Councils. The Decentralization Act (Law N0.7/2010) provides for three types of local authorities in the Maldives namely: (a) Atoll's Councils (section 6), (b) Island's Council (section 21) and (c) City's Council (section 39).

3. Maldivian Land Act

65. The 2008 Constitution vests all lands under the ownership of the state and bans foreign ownership of land. The government continues to review land-related legislation to bring it into line with the constitution and current development policy. Meanwhile, matters relating to land are governed by the provisions of the Maldivian Land Act (MLA) and Regulations of 2002, as subsequently amended.

66. The MLA Section 4 lists several purposes and uses of lands in the country. They are:

- (i) For the construction of households and buildings for residential purposes.
- (ii) For commercial use.
- (iii) For social use.
- (iv) For environmental protection.
- (v) For government use.

67. As per the MLA, land that belongs to an island council or city council can be used for government purpose, and such lands can be transferred to the relevant Ministry with the permission of Ministry of Housing, Land and Urban Development (MHLUD) and the respective island council or city council.

68. Under the MLA, all Maldivian citizens who do not have a place of residence are entitled

to a parcel of land for residential purposes, referred to as a "state dwelling". Such parcels are issued by the respective Atoll office and must not exceed 4,000 ft² (372 m²). The parcel is forfeit if not developed ("settled") within five years. State dwellings are heritable and divisible, down to no smaller than 600 ft² (56 m²).

69. State dwellings can be privatized by purchase from the government. Conversion to non-residential purposes is possible subject to compliance with land use policy and a permit. Sales of private land incur a 15% tax.

70. Buildings, trees and other assets on land belong to the owner of the land or official user of the land, unless third-party ownership can be proven under Shari'ah.

71. Land for agriculture is allocated to residents by island administrations on an annual renewable basis. The land remains government property. No rent is paid, but the plots are generally small and the system provides little security or incentive to invest in and improve the land. When land is required for public projects, it is understood that the legal owner or registered user is compensated on a land-for-land basis, with fixed assets being paid for at fair market price.

72. According to a 2011 President's Office Press Release (Ref. No. 2011-374), the Cabinet established the Maldives Land and Survey Authority to conduct surveys and collect and update information on the most beneficial uses of lands, lagoons and reefs of Maldives and to formulate and implement cadastral survey standards.

4. Land Use Planning and Management and Traditional Rights to Land

73. Land-use planning of inhabited islands is guided by the MHLUD. Land allocations and registrations are finalized by the Maldives Land and Survey Authority under the MHLUD with consultations and necessary approvals from both the MHLUD and sometimes also from other line ministries. There are no traditional governance structures in Maldives for coastal land and resource use. Local island and atoll offices play a major role, however, in the planning stages of land allocation and management on their respective islands. Locally formed and selected Island Development Committees and Atoll Development Committees play a critical advisory role in land management on inhabited islands.

74. A large proportion of uninhabited islands are managed under a traditional system called *Varuvaa*. Under the *Varuvaa* system land is leased out to individuals for minor economic activities, such as harvesting of coconuts and other natural products. Lessees undertake annual crop cultivation on islands where cleared agricultural land is available. On inhabited islands, land tenure systems are complex. Homestead plots are given free of charge. Plot sizes depend on the availability of land, with an average size being about 50 by 100 feet. Trees grown on homestead plots belong to the owner and the homestead allotment is inheritable. *Goi* land refers to a particular area of the inhabited island with special vegetative characteristics. Coconut palms and many tree species grown on *Goi* land belong to the government. *Goi* land is rented to the highest bidder. The lessee rents smaller plots for farming. In general, the lessee gets 12.5% of the income generated by farmers. *Faalabba* is a land area generally located close to residential areas. Islanders grow coconut palms and tree species with the permission of the Island Office. Half of the trees grown belong to the person who planted them and the other half is the property of the state. Most islands have communal land for the cultivation of annual crops. No rent is charged for cultivation on this land and no standard regulation exists for its use. On some islands, plots change hands every year; on other islands farmers can hold the plots as long as they continue cultivation.

B. ADB's Safeguard Policy Statement (2009)

75. The ADB SPS (2009) requires ADB-assisted projects to:
- (i) Avoid involuntary resettlement, where possible;
 - (ii) Where avoidance is not possible, minimize by exploring project and design alternatives;
 - (iii) Enhance or at least restore the livelihoods of all apts in real terms relative to pre-project levels; and
 - (iv) Improve the standards of living of the displaced poor and other vulnerable groups.
76. ADB's SPS 2009 covers both physical displacement (relocation, loss of residential land, or loss of shelter) and economic displacement (loss of land, assets, access to assets, income sources, or means of livelihoods) because of:
- (i) Involuntary acquisition of land; or
 - (ii) Involuntary restrictions on land use or on access to legally designated parks and protected areas. It covers displaced persons whether such losses and involuntary restrictions are full or partial, permanent or temporary.
77. The key principles of the ADB safeguard policy on resettlement are as follows:
- (i) Screen early the project's resettlement impacts and risks.
 - (ii) Carry out meaningful consultations with and participation of displaced persons (DPs)¹⁴, inform all DPs of their entitlements and resettlement options.
 - (iii) Pay particular attention to the needs of vulnerable groups. Establish a grievance redress mechanism.
 - (iv) Improve, or at least restore, the livelihoods of all DPs through i) land-based resettlement or cash compensation at replacement cost, as relevant, ii) prompt replacement of assets, iii) prompt compensation at full replacement cost, and iv) additional revenues and services through benefit sharing schemes where possible.
 - (v) Provide DPs with needed assistance, including: i) if there is relocation, secured tenure to relocation and, better housing; ii) transitional support and development assistance; and iii) civic infrastructure and community services, as required.
 - (vi) Improve the standards of living of the displaced poor and other vulnerable groups to at least national minimum standards.
 - (vii) Develop procedures in a transparent, consistent, and equitable manner if land acquisition is through negotiated settlement.
 - (viii) Ensure that DPs without titles are eligible for resettlement assistance and compensation for loss of non-land assets.
 - (ix) Prepare a RP elaborating on DPs' entitlements, income and livelihood restoration strategy and so on.
 - (x) Disclose an RP in an accessible place and a form and language(s) understandable to DPs and other stakeholders.
 - (xi) Conceive and execute resettlement as part of a development project or program.
 - (xii) Provide compensation and other entitlements before physical or economic displacement.
 - (xiii) Monitor and assess resettlement outcomes, their impacts on the standards of living of DPs.

¹⁴ AP is increasingly being replaced by the term "Displaced Persons (DPs)" following ADB SPS (2009) – but it is still in common use in the field. The terms of APs and DPs are used interchangeably in this document.

C. Comparison between Maldivian Land Act and SPS (2009) of ADB

78. The MLA is the primary legal framework for all land acquisition, compensation determination and relocation of APs in Maldives. The Act, however, has a limited scope in terms of resettlement and rehabilitation of APs. The practical application of the MLA does not meet the principles of the ADB SPS (2009). For example, the legislation does not cover the provision to formulate an RP to address adverse involuntary resettlement impacts, has no clause for special assistance to vulnerable household and has no provisions for income and livelihood support and restoration. Further details on the differences between the government laws, regulations and guidelines and the safeguard policies of ADB is available in the RF of the Project. Project policy on social safeguards will be based on land acquisition law in Maldives and the ADB policy on Involuntary Resettlement as embedded in the SPS (2009). In the event there is a discrepancy between the laws and regulations of the Government of Maldives and ADB safeguards policies, the ADB safeguards policies will prevail.

D. Eligibility of Entitlements

79. All the APs identified in the Project impacted areas at the time of the cut-off date will be entitled to compensation and/or assistance for their affected assets. Those who encroach into the project area and build any new structure after the cut-off date will not be entitled to compensation or any other assistance.

80. The Project does not anticipate involuntary resettlement and land acquisition. In the event that involuntary resettlement is unavoidable, APs are entitled to compensation and other benefits as per policy delineated in the RF of the Project that complies with laws and regulations of Maldives and of ADB's SPS (2009).

V. Consultation and Disclosure

A. Consultation

81. Information sharing on the Project's Output 2 SPs has been carried out by conducting several rounds of discussion and consultation meetings with the key stakeholders in Kulhudhuffushi City between 12-13 May 2024, involving the officials of KCC, WDC, coir rope making group, youth and NGOs, boat owners and fishermen. In this process, the specific positive aspect of social safeguards was highlighted by confirming that the SP interventions will not trigger ADB's SPS safeguard requirements on involuntary resettlement or on Indigenous Peoples. Some pictures of the consultation meetings are provided in Figure 35.

Figure 35: Photos of Consultation Meetings



Meeting with Kulhudhuffushi City Council on 12 May 2024



Meeting with Kulhudhuffushi City Council on 12 May 2024



Meeting with Women's Development Committee in Kulhudhuffushi City on 12 May 2024



Meeting with coir rope making group in Kulhudhuffushi City on 12 May 2024



Meeting with fisherman and boat owners in Kulhudhuffushi City on 13 May 2024

82. The safeguard due diligence exercise confirms that physical implementation of the SPs under OP2 will not involve any private LAR impact, will not involve any negative impact on livelihoods, and the target sites are free and government owned vacant land. During the

course of conducting the consultation meetings the consultant team held a presentation on proposed activities covered under OP2, as well as the other SP interventions under OP1, OP3 and OP4. Due diligence activity of screening involuntary resettlement impact under the OP2 SPs intervention was confirmed using the Involuntary Resettlement Impact Screening Checklist (Annex 2).

83. A summary of the consultation meetings is provided in Table 2, while the minutes of the consultation meetings together with the lists of participants are provided in Annex 3.

Table 2: Summary of Consultation Meetings

Meeting Date & Venue	Participants	No. of Participants	Main Topics of Discussion
12 May 2024 in KCC offices	Key officials of KCC, Consultants	12	Present and verify concept designs and technical details of the proposed Output 2 and on safeguards issues.
12 May 2024 in KCC offices	Official of KCC, WDC Officials, Consultants	8	Current use of the mangrove areas, flood zone areas, home and urban gardening, rainwater harvesting, issues of school and hospital.
12 May 2024 at households in Kulhudhuffushi City	Coir rope making group (women), Consultants	10	Restoration of mangrove system, development of the area for tourism, facilities to continue rope making, protection of shoreline.
13 May 2024 at Usge community space, Kulhudhuffushi City	Youth and NGOs, Consultants	11	Current use of the mangrove area, urban/home gardening, harbor development, protection of beach erosion near airport area.
13 May 2024 at Usge community space and harbor work site, Kulhudhuffushi City	Boat Owners, Fishermen, Consultants	13	Current issues at harbors, use of geo bags with provision of fishing platform, ways for increased trading of goods.

B. Disclosure

84. This DDR will be made available for reference in the MCCEE in Malé and at the KCC as well as in the site offices of the Project. Features of this DDR have already been disclosed to the key stakeholders through consultation meetings. After review and approval of the appropriate authority of the MCCEE and ADB, the final DDR will be disclosed on the websites of MCCEE and ADB. No civil works contract for the Output 2 will be awarded or construction will start before the approval of the final DDR of the Output 2 by ADB. The IAs are responsible for handing over the project land/site to the contractor free of any encumbrance.

VI. Grievance Redress Mechanism

A. General Principle

85. As soon as the Project commences, the PMU will establish a project specific simple and acceptable, transparent and effective GRM, stipulating the required level and number of GRCs. The GRM will provide time-bound and transparent mechanism to effectively manage and resolve any social or environmental concerns that may arise during the pre-construction, construction and operation of the Project, such as regarding negotiated/voluntary land donation or involuntary land acquisition, relocation, income restoration, environmental management and other related issues.

86. It is the responsibility of the PMU to provide information on the GRM to project affected

communities, i.e. all locations where the project is undertaken. This information should be provided within three months of the project commencement. Multiple means should be utilized to provide this information, including community meetings, public notices, mainstream media and social media.

87. The GRM will ensure that AP's concerns and complaints are promptly addressed, using an understandable and transparent process that is gender responsive, culturally appropriate and readily accessible to all segments of the AP at no costs and without retribution. It will be accessible to members of the community but also workers upon approval of the Project by ADB. The mechanism is not impeding access to the Maldivian judicial or administrative remedies.

88. PMU, Island/City Councils and contractors will inform the AP about the GRM on approval of the project. Through public consultations and distribution of the public information booklet, APs will be informed that they have a right to file complaints to the GRC. For issues pertaining to sexual exploitation and abuse and sexual harassment the grievance form and board should give direction on the appropriate contact numbers of Ministry of Gender, Family and Social Services to contact regarding such cases. Confidentiality of the aggrieved party should be maintained in such cases.

89. The GRC will be free to act independently and ensure equitable treatment of women and men in all decision making. The GRM will take effect immediately after loan/grant effectiveness or award of contract, whichever is earlier. The GRC will mediate conflict and avoid lengthy litigation that is inconvenient to APs.

90. A GRC does not possess any legal mandate or authority to resolve any issue, rather acts as an advisory body or facilitator to try to resolve issues between the affected household/person and the IAs. Any complaints of ownership or other suits, to be resolved by Maldivian legislation, will not be resolved in GRC. The AP always has final recourse through Maldives legal channels. However, every effort will be made to avoid this by applying traditional conflict resolution procedures in negotiating resolutions to complaints.

91. Should the AP want to pursue legal recourse, the Project will ensure that the support is given to the AP to prepare a case. The PMU will provide the contact details of the Attorney General's office, and will assist aggrieved persons(s) in accessing the Attorney General's office. No fees will be charged on the AP for such assistance. Similarly, no financial payments will be required for APs to have their grievances addressed.

B. Mechanism

92. A three-tier mechanism is proposed for grievance redress of environmental and social matters in regards to the installation and operation of various project components using existing island council administrative structures for APs, organizations, community groups, and workers, any of which can be complainants. Should the grievance not be resolved and/or the AP is not satisfied with the outcome, the complaint will be referred to the next tier. The mechanism is visualised in Figure 36, and detailed in Table 3. The grievance recording form is provided in Annex 4.

Figure 36: Flow chart of Grievance Redress Mechanism

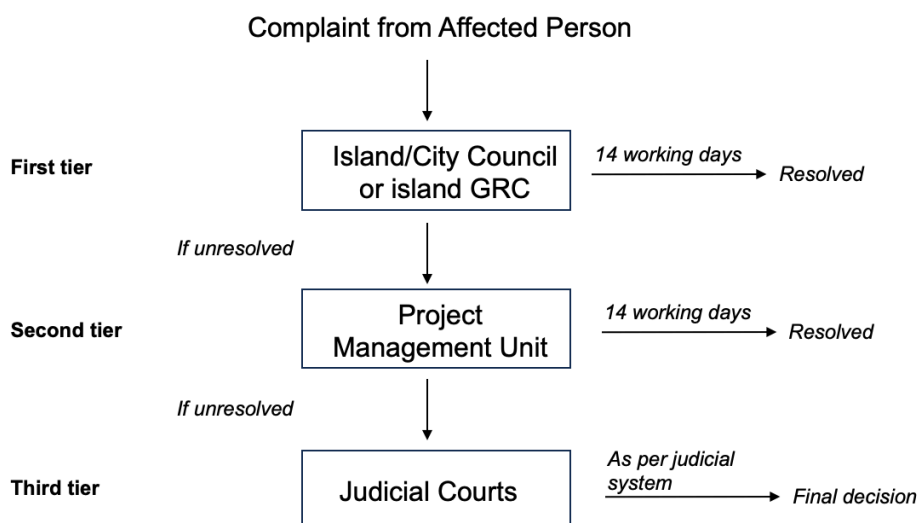


Table 3: Grievance Redress Mechanism

Focal Person for Contact	Contacts, Communication and Other Facilitation by Project	Timeframe to address grievance
First Tier: Island/City Council and Contractor / Island-level GRC		
Designated contact persons should be established within the Council with a designated contact number.	<ul style="list-style-type: none"> In the island/city council office, contractor office and the project site there will be an Information Board providing details of the GRM listing the names, sex and contact telephones/emails. Grievances will be registered informally by contacting the designated island/city council or GRC member. If the grievance cannot be resolved informally, a formal complaint can be registered through phone/email or by submitting the complaint form. The form must be available online (digital form) on the websites of all implementation partners and physical forms should be available from the contractor's office, at the council offices and at PMU, including drop boxes to submit physical forms. A hotline will be established to receive grievances via phone call and mobile message. For those who cannot properly write, a staff will assist in filling the complaint form and get it signed by the aggrieved party. The council or island GRC will screen the grievance to determine if the issues and concerns raised in the complaint falls within the mandate of the project. If it is related to the project, the council will inform the aggrieved party in writing (copied to PMU) how the case will be processed as per this GRM. This should occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter will be read to the person in presence of a witness and the witness should declare their witness to this event. Alternatively, if it is not related to the project, the council or island GRC will inform the aggrieved party that it is not related to the project in writing (copied to PMU) and will inform how the case will be handled. This communication will occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason), the issued letter will be read to the person 	14 working days

Focal Person for Contact	Contacts, Communication and Other Facilitation by Project	Timeframe to address grievance
	<p>in presence of a witness and the witness should declare their witness to this event.</p> <ul style="list-style-type: none"> • Where the grievance is related to the project, the council or island GRC will come up with a solution either by (i) discussing within the council; (ii) joint problem solving with the aggrieved parties, PMU and the contractor or; (iii) a combination of both options. • The council or island GRC will communicate the final decision in writing, in terms of how the grievance was handled to the aggrieved party within 14 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued decision will be read to the person in presence of a witness and the witness should declare their witness to this event. • The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 10 days. • If no acknowledgement is submitted from the aggrieved party, then the decision will be considered as accepted. • If the grievance is not resolved to the satisfaction of the aggrieved party within 14 working days of submission of the grievance to tier 1 then the aggrieved party may notify the MCCEE, in writing, of the intention to move to tier 2. • The council or GRC will maintain records of all complaints received. 	
Second Tier: Ministry of Climate Change Environment and Energy (Project Management Unit)		
The social and environmental safeguards specialist of the PMU or the designated contacts for the PMU.	<ul style="list-style-type: none"> • Where the aggrieved party is not satisfied with the outcome of the decision by the council or GRC or where the aggrieved party is of the view that the council or GRC is not capable of justly solve the issue or where the grievance is not resolved within 14 working days the grievance can be upgraded to tier 2. • The Island Council or GRC will forward the grievance to the MCCEE. MCCEE will forward the grievance to the PMU. • A formal receipt of the complaint will be provided to the aggrieved party. • The PMU will come up with a solution either by (i) discussing in the project steering/technical committee; (ii) joint problem solving with the aggrieved parties, the council and the contractor (iii) undertaking site visits and holding onsite discussions or; (iii) a combination of all these options. • The PMU will be responsible to ensure that there is no cost imposed on the aggrieved person, due to the GRM at the third tier. • MCCEE will communicate the final decision in writing, in terms how the grievance was handled to the aggrieved party within 14 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter should be read to the person in presence of a witness and the witness should declare their witness to this event. • The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 10 days. • If no acknowledgement is submitted from the aggrieved party then the decision will be considered as accepted. 	14 working days
Third Tier: Judiciary Power / Court system		

Focal Person for Contact	Contacts, Communication and Other Facilitation by Project	Timeframe to address grievance
The social and environmental safeguards specialist of the PMU provides assistance in accessing the judicial power	<ul style="list-style-type: none"> The legal system is accessible to all aggrieved persons. Assistance from the PMU is available to all aggrieved persons as per this GRM. In cases where aggrieved persons have no means to access the legal system, the Attorney General's office will provide legal support to the vulnerable person(s). The PMU must provide the contact details of the Attorney General's office. The verdict of the Courts will be final. 	As per established Judicial Procedure

C. Key Parties

93. At the first tier, a GRC is proposed to be set up in Kulhudhuffushi City due to the extent and duration of the proposed Project activities on this island. On the other Project islands, where the measures are smaller in nature and of shorter duration, the island council and contractor will jointly form the first tier, and will solicit views of other stakeholders (WDC, farmers, fishermen, youth, NGOs, etc.) as appropriate and needed.

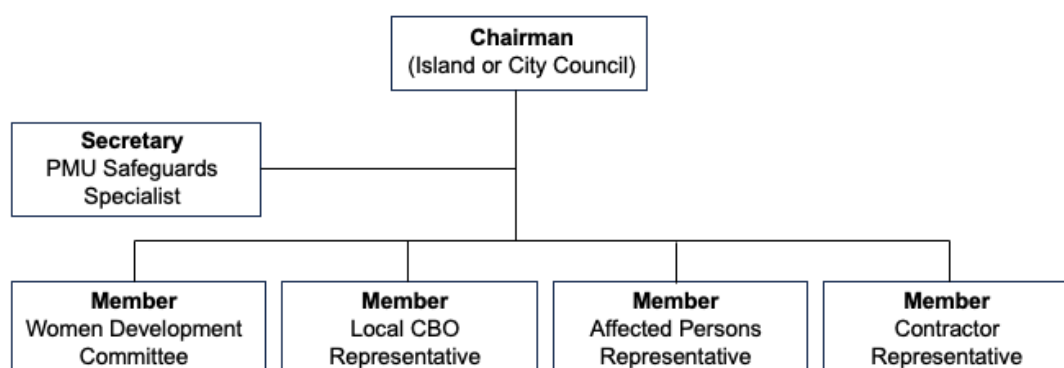
94. Specifically for the measures under SP1.1 at Addu International Airport (Gan) and SP1.2 on Velana Airport (Hulhulé), due to the nature of these islands being industrial managed by the airports authority rather than inhabited and managed by a council, a GRC will not be formed. The relevant airports authority (Addu International Airport and Maldives Airports Company Limited, respectively), MMS and a representative from the construction contractor will jointly form the first tier, and the three-tier system remains in place. Any aggrieved party can lodge grievances, despite not residing on the islands.

95. The GRC at Kulhudhuffushi City is proposed to be composed of a 6-member body, formed at the project area to facilitate the timely resolution of APs' concerns, complaints, and grievances about the project's environmental and social performance.

96. The PMU safeguards team will organize the required training program to brief the GRC members about their responsibilities and the operation of the GRC. The proposed composition of a GRC membership is presented in Table 4 and Figure 37.

Table 4: Composition of Island Grievance Redress Committee

Member	Number	Position
Chairperson	1	Representative from Island/City Council
Member	1	Concerned Women Development Committee
Member	1	Representative from local CBO/NGO
Member	1	Representative from the Construction Contractor
Member	1	Representative of Affected Persons
Secretary	1	Project Safeguards Specialist

Figure 37: Composition of Island Grievance Redress Committee

97. If the aggrieved person is a female, then the GRC must include at least one female member (ideally a representative from the local WDC) to participate in the hearings. In case of the absence of any of the members during the decision-making process, an appropriate candidate will be nominated by the original representative.

98. At the second tier, the MCCEE PMU will be based in Malé and have two designated staff members (the Social Safeguards Specialist and Environmental Safeguards Specialist) to address all potential complaints from the public, workers and other APs for the pre-construction, construction and operation of the Project. They will liaise regularly with the island councils, contractors and site supervisors regarding any grievances received. They will also liaise with national agencies and line departments as required.

99. At the third tier, the AP can access the judicial power through Attorney General's office. The PMU will provide the contact details of the Attorney General's office, and will assist aggrieved persons(s) in accessing the Attorney General's office.

100. The AP at any time can access the national judicial system irrespective of the result of project-level grievance redress mechanism.

101. For issues pertaining to gender-based violence, sexual exploitation and abuse, and sexual harassment all grievances need to be forwarded to the hotline number of Ministry of Social and Family Development (1421). Confidentiality of those who submit such grievances should be ensured. This information should be provided in the grievance information boards.

102. For the workforce at the PMU and other contractors the employment contracts should define the grievance redress mechanism to follow. The Human Resource Committee or department of the organization can look into general grievances and the SEA/SH committee of the Ministry for those pertaining to such cases.

103. The AP have the right to submit their complaint at any time directly to the respective Project Officer at ADB headquarters, writing in any of the official languages of ADB's Developing Member Countries. The PMU Social Safeguard Specialist will support the AP in providing the following contact information of ADB:

Mr. Takeshi Ueda
Officer-in-Charge
Telephone No.: +63 2 8632 6973
E-mail address: taueda@adb.org
Asian Development Bank

Emerging Areas Team, Food, Nature, and Rural Development Sector Office (SG-AFNR).

VII. Conclusion and Next Steps

104. **Conclusion.** This DDR confirms that the physical implementation of the SP components under Output 1 are free of involuntary land acquisition and resettlement (LAR) impacts such as land acquisition, physical displacement, economic displacement, impact on livelihood, community properties or any other impacts based on a review of land registries, consultations and field visits to the proposed locations. All physical works are proposed to be undertaken on vacant and unused land owned by the Government of Maldives, allocated to the Addu International Airport authority and Maldives Airport Company Limited. Temporary disruption to work will be mitigated through the EMP. The interventions under Output 1 SPs falls under Category C for involuntary resettlement and Category C for indigenous peoples as per ADB SPS (2009).

105. **Next steps.** For SP2.1 and SP2.2, when final locations are selected during the detail design phase, following the modelling studies, this DDR will need to be updated. During implementation of the construction works, if any land acquisition or involuntary resettlement becomes necessary for any of the SPs, the project will be responsible to prepare a RP in line with the guidelines underlined in the RF of the Project that has been prepared in conformity with ADB's safeguards requirements on involuntary resettlement, adhering to Maldives laws and policies. Avoidance and mitigation measures for temporary disruption will be included in the EMP.

106. **The Project** will make sure that all safeguard requirements are followed, and no one is disadvantaged in the process of development. PMU, assisted by its Social Safeguard Specialists, will strictly monitor the construction activities and report on any unexpected impact that may occur and will incorporate that information in Social Safeguard Monitoring Report.

Annex 1: Letter from Kulhudhuffushi City Council on land ownership and LAR impacts

Secretariat of Kulhudhuffushi City Council
Kulhudhuffushi, Republic of Maldives



Reference No: 266-ED/ADB/2024/1

02 July 2024

To whom it may concern,

This letter is to confirm that the land for the proposed sites identified for physical works under Output 2 of the *Enhancing Climate Resilience and Food Security Project* is owned by Kulhudhuffushi City Council.

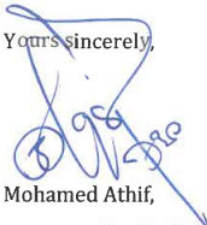
This includes the location of:

- (i) Subproject 2.1: Inland drainage network improvements, including a bioswale, culverts, outfalls, infiltration trenches and bioretention cells (Annex 1);
- (ii) Subproject 2.2: Measures for the protection of the eastern shoreline (Annex 2).

There are currently no impacts on private land, structures and livelihoods anticipated for these subprojects.

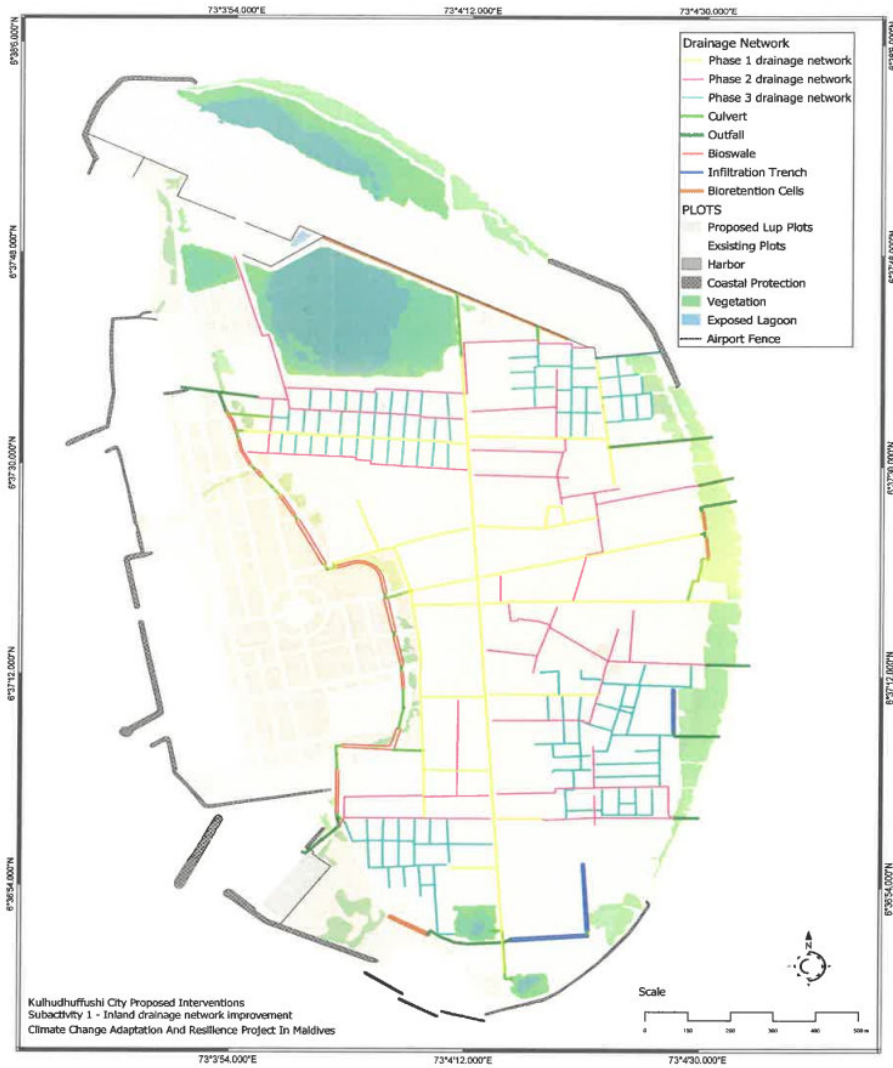
If any land acquisition or resettlement becomes necessary at time of actual implementation of any of the subprojects, Kulhudhuffushi City Council will support appropriate mitigation measures adhering to Maldives laws and policies and Asian Development Bank safeguards requirements.

Yours sincerely,

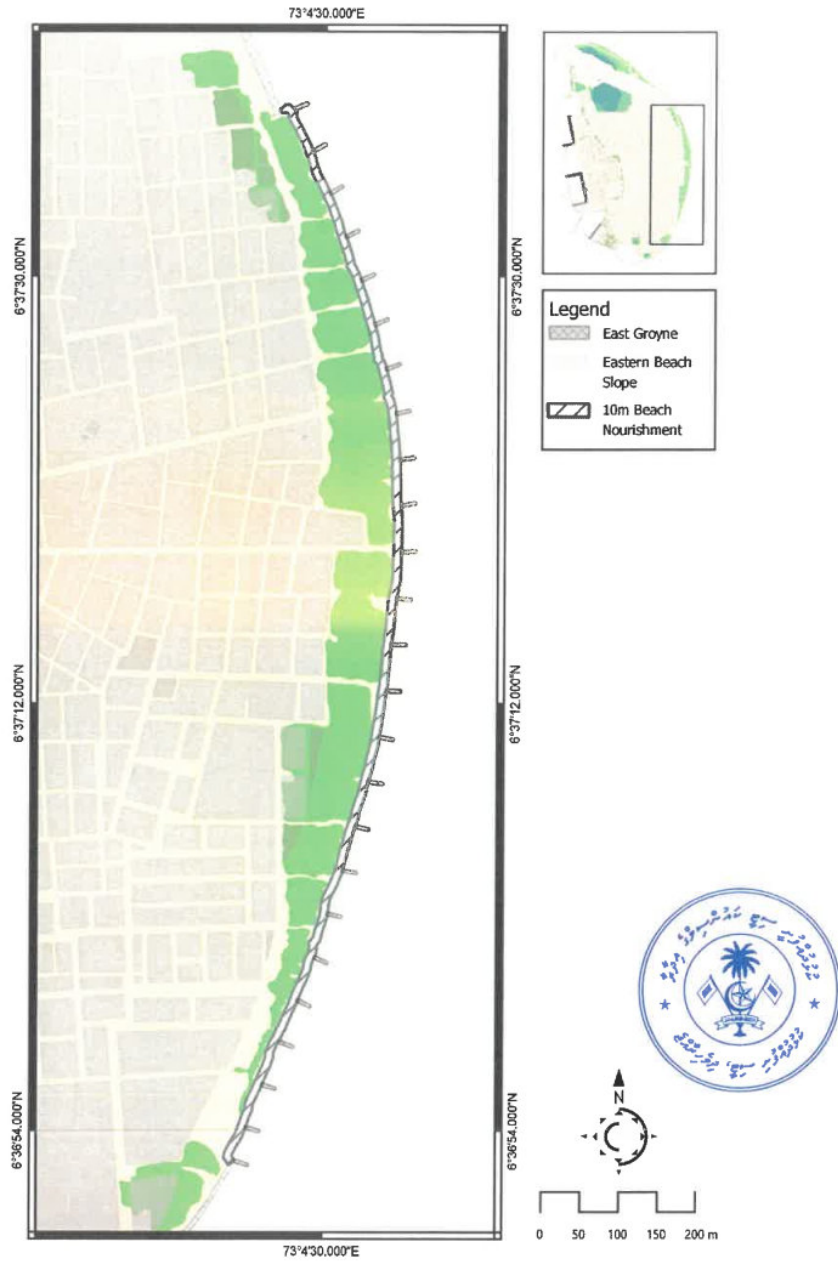

Mohamed Athif,
Mayor, Kulhudhuffushi City.



Annex 1: Locations of proposed improvements to the inland drainage network (Subproject 2.1)



Annex 2: Location of measure for the protection of the eastern shoreline (Subproject 2.2)



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Annex 2: Involuntary Resettlement Impact Screening Checklist

Annex 2a: Involuntary Resettlement Impact Screening Checklist/ Study No.1

Name of Project/Subproject Component: *Enhancing Climate Resilience and Food Security Project / Mangrove and groundwater hydrology modeling and detailed design study (Study)*

Location: (Atoll, Island/City, Community): Haa Dhaalu Atoll, Kulhudhuffushi City

1. Screening Questions for Involuntary Resettlement Impact

Involuntary Resettlement Issues	Yes	No	Not Known	Remarks
1) Will the project include any physical construction work?	X			Shallow wells for groundwater monitoring. The output of the study will identify the appropriate type of structures with detailed designs to be funded under the project.
2) Will it require permanent and/or temporary land acquisition?		X		
3) Will there be any physical displacement or relocation of this affected household due to the project improvement process?		X		
4) Will there be loss of income and livelihoods?		X		
5) Are there any non-titled people who live or earn their livelihood at the site or within the corridor of impact (COI)/right of way (ROW)?		X		
6) Will there be any loss of business or enterprises?		X		
7) Will there be any loss of housing land/plots?		X		
8) Will there be any loss of structure (building, boundary wall etc.)?		X		
9) Will there be any loss of agricultural land/plots?		X		
10) Will there be any loss of crops, trees, fixed assets such as fences, pumps etc?		X		
11) Will people lose access to facilities, services or natural resources due to the project?		X		
12) Will there be any loss of fixed asset having an impact of 10% of more income of this affected household?		X		
13) Is the affected person from physically handicapped, indigenous or ethnic minority group?				Not applicable

2. Involuntary Resettlement Impact

After reviewing the above answers, IA/safeguards team confirms that the proposed study:

- [] Has involuntary resettlement (IR) impact, a resettlement plan (RP) is required.
 [X] Has No IR impact, no RP is required. A due diligence report (DDR) for the subproject has to be prepared.

Prepared by (name): **Mohamed Saif Saeed**
 Position: **Civil/Environmental Engineer, ICEM-Epoch**
 Signature:

Date: 12 May 2024

Annex 2b: Involuntary Resettlement Impact Screening Checklist/ Study No. 2

Name of Project/Subproject Component: *Enhancing Climate Resilience and Food Security Project* / Marine and coastal modeling and detailed design study (**Study**)

Location: (Atoll, Island/City, Community): Haa Dhaalu Atoll, Kulhudhuffushi City

3. Screening Questions for Involuntary Resettlement Impact

Involuntary Resettlement Issues	Yes	No	Not Known	Remarks
1) Will the project include any physical construction work?	X			Instruments for sediment and wave monitoring may need to be temporarily attached to the seabed. The output of the study will identify the appropriate type of structures with detailed designs to be funded under the project.
2) Will it require permanent and/or temporary land acquisition?		X		
3) Will there be any physical displacement or relocation of this affected household due to the project improvement process?		X		
4) Will there be loss of income and livelihoods?		X		
5) Are there any non-titled people who live or earn their livelihood at the site or within the corridor of impact (COI)/right of way (ROW)?		X		
6) Will there be any loss of business or enterprises?		X		
7) Will there be any loss of housing land/plots?		X		
8) Will there be any loss of structure (building, boundary wall etc.)?		X		
9) Will there be any loss of agricultural land/plots?		X		
10) Will there be any loss of crops, trees, fixed assets such as fences, pumps etc?		X		
11) Will people lose access to facilities, services or natural resources due to the project?		X		
12) Will there be any loss of fixed asset having an impact of 10% of more income of this affected household?		X		
13) Is the affected person from physically handicapped, indigenous or ethnic minority group?				Not applicable

4. Involuntary Resettlement Impact

After reviewing the above answers, IA/safeguards team confirms that the proposed study:

- [] Has involuntary resettlement (IR) impact, a resettlement plan (RP) is required.
 [X] Has No IR impact, no RP is required. A due diligence report (DDR) for the subproject has to be prepared.

Prepared by (name): **Mohamed Saif Saeed**
 Position: **Civil/Environmental Engineer, ICEM-Epoch**
 Signature:

Date: 12 May 2024

Annex 2c: Involuntary Resettlement Impact Screening Checklist/ SP2.1

Name of Project/Subproject Component: *Enhancing Climate Resilience and Food Security Project* / Inland drainage network improvement, including bioswale (SP2.1)

Location: (Atoll, Island/City, Community): Haa Dhaalu Atoll, Kulhudhuffushi City

1. Screening Questions for Involuntary Resettlement Impact

Involuntary Resettlement Issues	Yes	No	Not Known	Remarks
1) Will the project include any physical construction work?	X			Excavation works, pipeline, construction of culverts, bioswale retention cells, road reconstruction and landscaping
2) Will it require permanent and/or temporary land acquisition?		X		Construction will be on public land.
3) Will there be any physical displacement or relocation of this affected household due to the project improvement process?		X		
4) Will there be loss of income and livelihoods?		X		
5) Are there any non-titled people who live or earn their livelihood at the site or within the corridor of impact (COI)/right of way (ROW)?		X		
6) Will there be any loss of business or enterprises?		X		
7) Will there be any loss of housing land/plots?		X		
8) Will there be any loss of structure (building, boundary wall etc.)?			X	Current small recreational facilities (e.g., community gathering structures near the area targeted for the bioswale) will need to be avoided. To be confirmed during detail design and updated in this DDR.
9) Will there be any loss of agricultural land/plots?		X		
10) Will there be any loss of crops, trees, fixed assets such as fences, pumps etc?	X			Potentially some existing vegetation and trees (for example in the targeted bioswale area), but the aim is to keep as much of the existing vegetation as possible.
11) Will people lose access to facilities, services or natural resources due to the project?		X		
12) Will there be any loss of fixed asset having an impact of 10% of more income of this affected household?		X		
13) Is the affected person from physically handicapped, indigenous or ethnic minority group?				Not applicable

2. Involuntary Resettlement Impact

After reviewing the above answers, IA/safeguards team confirms that the proposed subproject:

- [] Has involuntary resettlement (IR) impact, a resettlement plan (RP) is required.
 [X] Has No IR impact, no RP is required. A due diligence report (DDR) for the subproject has to be prepared.

Prepared by (name): **Mohamed Saif Saeed**
 Position: **Civil/Environmental Engineer, ICEM-Epoch**
 Signature:
 Date: 12 May 2024

Annex 2d: Involuntary Resettlement Impact Screening Checklist/ SP2.2

Name of Project/Subproject Component: *Enhancing Climate Resilience and Food Security Project* / Measures for the protection of the eastern shoreline (**SP2.2**)

Location: (Atoll, Island/City, Community): Haa Dhaalu Atoll, Kulhudhuffushi City

1. Screening Questions for Involuntary Resettlement Impact

Involuntary Resettlement Issues	Yes	No	Not Known	Remarks
1) Will the project include any physical construction work?	X			Shore protection including revetments and groynes.
2) Will it require permanent and/or temporary land acquisition?		X		
3) Will there be any physical displacement or relocation of this affected household due to the project improvement process?		X		
4) Will there be loss of income and livelihoods?		X		
5) Are there any non-titled people who live or earn their livelihood at the site or within the corridor of impact (COI)/right of way (ROW)?		X		
6) Will there be any loss of business or enterprises?		X		
7) Will there be any loss of housing land/plots?		X		
8) Will there be any loss of structure (building, boundary wall etc.)?		X		
9) Will there be any loss of agricultural land/plots?		X		
10) Will there be any loss of crops, trees, fixed assets such as fences, pumps etc?	X			Some minor vegetation may be lost due to create access for construction vehicles for shore protection works.
11) Will people lose access to facilities, services or natural resources due to the project?		X		
12) Will there be any loss of fixed asset having an impact of 10% of more income of this affected household?		X		
13) Is the affected person from physically handicapped, indigenous or ethnic minority group?		X		

2. Involuntary Resettlement Impact

After reviewing the above answers, IA/safeguards team confirms that the proposed subproject:

- [] Has involuntary resettlement (IR) impact, a resettlement plan (RP) is required.
 [X] Has No IR impact, no RP is required. A due diligence report (DDR) for the subproject has to be prepared.

Prepared by (name): Mohamed Saif Saeed
Position: Civil/Environmental Engineer, ICEM-Epoch

Signature:

Date: 12 May 2024

Annex 3: Minutes of Consultation Meetings

Annex 3a: Meeting with Kulhudhuffushi City Council

COMMUNITY CONSULTATION MEETING

Meeting with Kulhudhuffushi City Council



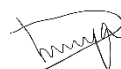



Date: Sunday 12 May 2024

Meeting Start Time: 08h30

Meeting Finish Time: 09h30

Venue: Kulhudhuffushi City Council Meeting Room

Participants:

No.	Name	Position and Organization	E-mail	Telephone	Signature
1	Ahmed Abdulla (M)	Council Member, Kulhudhuffushi City Council	ahammadh@gmail.com	7938817	See Figure 1 for the signed list of participants
2	Athifa Ali (F)	Council Member, Kulhudhuffushi City Council	athitfaiali@gmail.com	7782120	
3	Aminath Majeeda (F)	Council Member, Kulhudhuffushi City Council	a.maeedha@kulhudhuffushiity.gov.mv	7911628	
4	Abdulla Adam (M)	Council Member, Kulhudhuffushi City Council	abdulla.adam@kulhudhuffushiity.gov.mv	9973320	
5	Aishath Afa Ali (F)	Council Officer, Kulhudhuffushi City Council	aishath.afa@kulhudhuffushiity.gov.mv	9705456	
6	Mohamed Athif (M)	Mayor, Kulhudhuffushi City Council	athif@kulhudhuffushiiity.gov.mv	7795003	
7	Monzurul Hoq (M)	Social Safeguards Specialist, ICEM-Epoch	mhoq@ymail.com	+8801712-783966	
8	James Ramsay (M)	Environmental Safeguards Specialist, ICEM-Epoch	jramsay@horizon.bc.ca	+447504815937	
9	Dhumya Ahmed (F)	Communications Specialist, ICEM-Epoch	dhumya.ahmed@epoch.associates	9112812	
10	Mohamed Saif Saeed (M)	Civil/Environmental Engineer, ICEM-Epoch	saif@epoch.associates	9199960	
11	Nick Beresnev (M)	Economist, ICEM-Epoch	n.beresnev82@gmail.com	+61444562127	
12	Miguel Coulier (M)	Team Leader/Climate Change Specialist, ICEM-Epoch	miguel.coulier@icem.com.au	+84867476583	

Name & Position of the person presided over the meeting:
Miguel Coulier, Team Leader/Climate Change Specialist

Record of Discussion

The main points discussed were:

- Miguel: The following measures are currently considered under Output 2, for validation during this mission:
 - Mangrove and groundwater study + detailed design (12 months)
 - Marine and coastal monitoring study + detailed design (12 months)
 - Inland drainage network improvement, including bioswale and infiltration trenches, and a better connection between the different phases of the road network
 - Measures for protection of the eastern shoreline, including for beach nourishment, to avoid flooding and overtopping
 - Coastal protection measures for northwest beach
 - Northern mangrove interconnection and connection to the sea
 - Southern mangrove interconnection and connection to the sea
 - Harbour breakwater upgrades, including sediment flow controls
 - Geobags and groynes for stabilization of southern beach
 - Groyne field for protection of airport shoreline and mangroves
 - Airport drainage network improvements
 - Policy and institutional support: drainage O&M plan, mangrove management plan, guidelines
 - Capacity building program for KCC, MCCEE, MoCI, RDC

It is unlikely all the measures will be funded under the current budget envelope, so we need to understand the main priorities and which measures should be funded first.

- Adam: There are major issues with pluvial flood protection. Proper drainage systems are lacking current system does not cater for the future demand. There are no outfalls in phase 1 road development. The drainage network needs to be improved and better integrated.
- Adam: The erosion on the north beach area and the eastern shoreline is visible.
- Miguel: The proposed measures require further design assessments to define the detailed design, and also require policy/institutional support.
- Adam: The North Harbor also faces significant problems with the existing design, which limits the usage of the harbor. Where we can, we should minimize further interventions and prioritize modifications and upgrades.
- Saif: The width of the harbor is not similar to most harbor designs.
- Adam: There is a shortage of berthing areas in both harbors, we need reestablishment of a mechanism where berthing can happen in the upper zone. During the initial design, the design was changed, current design has significant challenges for pedestrians.
- Mayor Athif: How long would the measures on the eastern shoreline last?
- Saif: With current technology, it will last up to 50 years.
- Adam: What would coral restoration look like?
- Saif: It is under consideration. Submerged breakwater option could be considered too.
- Adam: Erosion on the airport side has significantly increased, so comprehensive reef management is needed. Coral reef bleaching and sedimentation near the area is observed.
- Mayor Athif: Northern Harbor reclamation area will happen soon, Maldives Ports will implement the reclamation. Access roads are also proposed on the eastern side of the

Figure 2: Photos of meeting with Kulhudhuffushi City Council



Annex 3b: Meeting with Women Development Committee**COMMUNITY CONSULTATION MEETING**
Meeting with Women Development Committee**Date:** Sunday 12 May 2024

Meeting Start Time: 10h00

Meeting Finish Time: 11h00

Venue: Kulhudhuffushi City Council meeting room, Kulhudhuffushi City Council**Participants:**

No.	Name	Position and Organization	E-mail	Telephone	Signature
1	Athifa Mohamed (F)	W. President, Women's Development Council	athifamohamed21@gmail.com	7999531	See Figure 1 for the signed list of participants
2	Khadeeja Moosa (F)	President, Women's Development Council	khajamusa2328@gmail.com	9224244	
3	Akbaree Mohamed (F)	Member, Women's Development Council	akooaa58@gmail.com	7488699	
4	Shahida Adam (F)	Member, Women's Development Council	shahidhadami@gmail.com	9491515	
5	Azleena Ali (F)	Assistant Council Officer, Kulhudhuffushi City Council	azleena972@gmail.com	9725841	
7	Monzurul Hoq (M)	Social Safeguards Specialist, ICEM-Epoch	mhoq@ymail.com	+8801712-783966	
8	James Ramsay (M)	Environmental Safeguards Specialist, ICEM-Epoch	jramsay@horizon.bc.ca	+447504815937	
9	Dhumya Ahmed (F)	Communications Specialist, ICEM-Epoch	dhumya.ahmed@epoch.associates	9112812	

Name & Position of the person presided over the meeting:
Dhumya Ahmed, Communications Specialist

Record of Discussion

The main points discussed were:

- What is the current use of the mangrove area?
 - Northern mangrove is still used for coconut husk work by women.
 - WDC is not involved in any work to develop coir rope sector.
 - Mosquito problem has been prevalent recently, council has asked the groups and individuals to remove the dug pits
 - Currently around 80-100 people do coir rope work.
- Four flood zone areas:
 - Maalihaa magu near holhu ashi
 - Reclamation area

- Hospital area
- University campus area near dhanaal
- Home gardening, urban gardening
 - WDC tried to do hydroponic farming last year and brought a farmer from Laamu for training, but could not do it because of challenges from the Local Government Authority side.
 - If a grant scheme is introduced can use the finance for projects like these.
- Rainwater is not collected because lack of space for rainwater harvesting.
- Finimaizan park by WDC is finished and ready to open on the east side of the island.
 - It was supposed to be a nature park but some individuals had cut the bigger trees in that area without them knowing.
- AEC school has almost 60 differently-abled students and lack of road signs and platforms for this group is a significant problem.
- Only school and hospital have a zebra crossing on the island.

Signature of the Chair:

Dhumya Ahmed, Communications Specialist

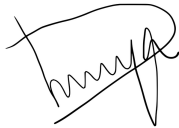
A handwritten signature in black ink, appearing to read 'Dhumya', written over a horizontal line.

Figure 1: List of participants in Kulhudhuffushi City Women’s Development Committee meeting

Participant list (Meeting With Women's Development Committee)
Venue: Kulhudhuffushi City Council Meeting (8:00 am) 12 May 2024

Sl	Name	Title	Organisation	Gender	Phone	Email address	Signature	(Am. happy to appear in ICMS)
1	Alhifa Mohamed.	w. president	WDC	F	7999531	alhfamohamed21@gmail.com		yes
2	Khodheerja Maosa	president	WDC	F	9224244	Khaja.MUSA.2328@gmail.com		yes
3	Akbarce Mohamed	WDC member	WDC	f	7488699	Akbarce58@gmail.com		yes
4	Shahida Adam	member	WDC	f	9991515	shahidiladam@gmail.com		yes
5	Azleena Ali	Assistant council officer	Kulhudhuffushi City Council	f	9725841	azleena972@gmail.com		yes.
27								

(Am. happy to appear in ICMS) (Am. happy to appear in ICMS) (Am. happy to appear in ICMS) (Am. happy to appear in ICMS) (Am. happy to appear in ICMS)

Figure 2: Photos of Kulhudhuffushi City Women’s Development Committee meeting



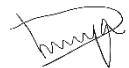


Annex 3c: Meeting with Coir Rope making group (women)**COMMUNITY CONSULTATION MEETING**
Meeting with Coir Rope making group (women)**Date:** Sunday 12 May 2024

Meeting Start Time: 17h00

Meeting Finish Time: 18h00

Venue: Kulhudhuffushi City**Participants:**

No.	Name	Position and Organization	E-mail	Telephone	Signature
1	Aminath Ali (F)	Part time coir rope maker	n/a	n/a	See Figure 1 for the signed list of participants
2	Asma Abbas (F)	Part time coir rope maker	n/a	n/a	
3	Khadeeja Mohamed (F)	Part time coir rope maker	n/a	n/a	
4	Sobira Hussain (F)	Part time coir rope maker	n/a	n/a	
5	Fathmath Abdul Rahman (F)	Part time coir rope maker	n/a	n/a	
6	Chandara Moosa (F)	Part time coir rope maker	n/a	n/a	
7	Monzurul Hoq (M)	Social Safeguards Specialist, ICEM-Epoch	mhoq@ymail.com	+8801712-783966	
8	James Ramsay (M)	Environmental Safeguards Specialist, ICEM-Epoch	jramsay@horizon.bc.ca	+447504815937	
9	Dhumya Ahmed (F)	Communications Specialist, ICEM-Epoch	dhumya.ahmed@epoch.associates	9112812	

Name & Position of the person presided over the meeting:
Dhumya Ahmed, Communications Specialist

Record of Discussion

The main points discussed were:

- We agree that mangrove area needs to be more organized for ecotourism to thrive and we like the idea of having a walking platform and a hut near the work site.
- Nature park idea is favorable, the council can earn more income from this.
- How much space is needed? And how many people will go back to this space for coir soaking?
 - 8ft by 10ft, 4 parts at least for each individual.
 - Quite pessimistic about the work continuing in the long run since most of us do this as a part time work, many women have switched to other income sources.
 - Mangrove is most likely not to thrive again, now a lot of people have already stopped this work after the airport construction.
 - We get paid a lot less and now there are imported ropes from India which is cheaper for suppliers to buy.

- Getting coconut husk is difficult now because there are fewer palms.
- We use freezers and large containers for coconut husk soaking.
- Before at least 202 households had individuals doing this work accumulating MVR 7 million in revenue. Currently only around 80-100 people do coir rope work.
- Mosquito problem has been prevalent recently, council has asked the groups and individuals to remove the dug pits.
- Even if the mangrove system is restored, we would like the place to be developed for tourism more than for our work.
- We will also continue the work if a space is allocated. We have observed water drying up in the mangroves. In such days the dug pits at home and in other areas near the mangrove come in handy.
- The artificial beach is mostly used by families and children for swimming, there are kite surfers too, both in the mangrove area and beach area.
- Shoreline protection would be good and will help with erosion.

Signature of the Chair:

A handwritten signature in black ink, appearing to be 'Thanya', written in a cursive style.

Figure 1: List of participants in coir rope making group consultation

Participant list (Meeting with coir rope making group)
Venue: USge (17:00 pm) 12 May 2024 (Eulhudhuffushi City)

No	Name	Title	Organisation	Gender	Phone	Email address	Signature	I am happy to appear in ICMSI conservation, training material
1	f Amiaath Ali	part time coir rope maker	-	f				
2	f Asma Abbas	"	-	f				
3	f Hadeesa mohamed	"	-	f				
4	f Sobira Hussain	"	-	f				
5	f Fathma Abdulkalam	"	-	f				
6	f Chandana Moosa	"	-	f				
7	f Jameela Hassan	"	-	f				
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Figure 2: Photos of meeting with coir rope making group



Annex 3d: Meeting with Youth and NGOs**COMMUNITY CONSULTATION MEETING**



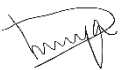

Meeting with Youth and NGOs

Date: Monday 13 May 2024

Meeting Start Time: 16h00

Meeting Finish Time: 17h00

Venue: Usge community space, Kulhudhuffushi City**Participants:**

No.	Name	Position and Organization	E-mail	Telephone	Signature
1	Hussain Hassan (M)	Treasurer, Maldives Red Crescent Kulhudhuffushi City Unit	hussain.mvmv@gmail.com	9807474	See Figure 1 for the signed list of participants
2	Hussain Yoosuf (M)	Vice Chair Person, Maldives Red Crescent Kulhudhuffushi City Unit	hussainyoosuf772@gmail.com	7556981	
3	Aishath Afa Ali	Youth Member, Maldives Red Crescent Kulhudhuffushi City Unit	aishathafaagq@gmail.com	9705956	
4	Mohamed 5Faisal (M)	Youth Member	starIntphai@gmail.com	9133087	
5	Ali Adam (M)	Youth Member	alyadam23@gmail.com	9922091	
6	Mohamed Nishau (M)	Youth Member	mohamednishau@gmail.com	9887373	
7	Ali Nabaah (M)	Youth Member, Beleaf Community Group	alinabaah8@gmail.com	9679197	
8	Monzurul Hoq (M)	Social Safeguards Specialist, ICEM-Epoch	mhoq@ymail.com	+8801712-783966	
9	James Ramsay (M)	Environmental Safeguards Specialist, ICEM-Epoch	jramsay@horizon.bc.ca	+447504815937	
10	Dhumya Ahmed (F)	Communications Specialist, ICEM-Epoch	dhumya.ahmed@epoch.associates	9112812	
11	Mohamed Saif Saeed (M)	Civil/Environmental Engineer, ICEM-Epoch	saif@epoch.associates	9199960	

Name & Position of the person presided over the meeting:
Dhumya Ahmed, Communications Specialist

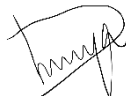
Record of Discussion

The main points discussed were:

- What is the current use of the mangrove area and current status?
 - We like the idea of having a walking platform that can be used for eco-tourism.
 - Nature park idea is favorable, there are currently kite surfers using mangrove for recreation.

- Some part of mangrove is also used by coir rope group, but not as much as before.
- Most youth are not interested in coir rope work, as there is not enough income generation and it is time-consuming work.
- MRC conducted propagule work in the northern area mangrove last October.
- There are invasive, parasitic plants which are not usual in the mangrove area.
- Fish dying in high temperatures have been noticed.
- School students also visit mangrove area for biodiversity projects, less school equipment to have a laboratory and study mangrove species.
- Is there interest in urban/home gardening?
 - If a grant scheme is introduced, people would be interested to explore different types of farming.
 - Kulhudhuffushi is not a farming island, only a few households have home gardens.
 - If urban farming is introduced people would be interested to learn, currently there is no space for community farming.
 - Organic food is not common will take time people to practice consuming.
 - Schools have done hydroponic farming.
 - There is a nursery planned by City council.
 - Some central based NGOs such as Small Island Geographic Society (SIGS) have done home gardening workshops.
 - Farmers market has potential to expand, currently 20 to 30 sellers, mostly from Ha. Kelaa and HDh. Holhivaranfaru.
 - Due to RTL facility sellers are not increasing in numbers due to frequent ferry travels within the atoll.
- Harbor development
 - North harbor is used by many youths and kids for recreation such as kite surfing and swimming.
- Beach use
 - Artificial beaches are used for volleyball and handball
 - Rahmathee fannu area is used for families to hang out.
 - Fitness activities for both men and women on the beach.
 - Have seen beach erosion near airport area.
 - For the ring road project vegetation was cleared including palms which are used by coir rope makers to get coconut husks.
- Road and drainage
 - Ooredoo peace cable is near airport fence area (main cable) and second cable is on the MWSC road
 - Road Development Cooperation has plans to have inundated water to flow to M3 mangrove area.

Signature of the Chair:



Annex 3e: Meeting with Boat Owners and Fishermen

Community Consultation Meeting
Meeting with Boat Owners and Fishermen


Date: Monday 13 May 2024

Meeting Start Time: 20h30

Meeting Finish Time: 21h30

Venue: *Usge* community space and harbor work site, Kulhudhuffushi City

Participants:

No.	Name	Position and Organization	E-mail	Telephone	Signature
1	Hassan Riza (M)	Boat owner (fishing boat)	hassanrixaza@gmail.com	9141280	See Figure 1 for the signed list of participants
2	Abdulla Abdul Raheem (M)	Fishing boat crew	abdulaafaraq123@gmail.com	9183718	
3	Irushaad Mohamed (M)	Boat owner (fishing boat)	imenadher@gmail.com	911056	
4	Ahmed Hassan (M)	Harbor user	ahmedbinyof@gmail.com	963675	
5	Aboobakuru Hussein (M)	Fisherman	n/a	9324888	
6	Abdul Latheef (M)	Fisherman	n/a	7911451	
7	Ibrahim Hassan (M)	Fisherman	n/a	9638008	
8	Saeed Ibrahim (M)	Fisherman	n/a	9681981	
9	Aboobakuru Hassan (M)	Fisherman	n/a	9167171	
10	Monzurul Hoq (M)	Social Safeguards Specialist, ICEM-Epoch	mhoq@ymail.com	+8801712-783966	
11	James Ramsay (M)	Environmental Safeguards Specialist, ICEM-Epoch	jramsay@horizon.bc.ca	+447504815937	
12	Dhumya Ahmed (F)	Communications Specialist, ICEM-Epoch	dhumya.ahmed@epoch.associates	9112812	
13	Mohamed Saif Saeed (M)	Civil/Environmental Engineer, ICEM-Epoch	saif@epoch.associates	9199960	

Name & Position of the person presided over the meeting: Dumay Ahmed, Communications Specialist

Record of Discussion

The main points discussed were:

- Current issues faced docking at both north and new harbor:
 - Lack of space fishermen boats.
 - There are currently 15 fishing boats (*odi*) operating
 - No ground water tap in the harbor, only 3-4 supply water taps by a privately owned company (Wavelength company). They have to buy water which is not

readily available and difficult to buy for boats visiting from other islands as well. After 6pm there is no water is available to buy.

- There is a concrete block for freezing, but no freezing practices undertaken.
- Waves are crashing above the revetment.
- Sediment and sand accretion in the new harbor
- Observed color changes in harbor water, harbor competitions also disrupted due to water contamination.
- Drainage in the harbor is no longer connected to the sea.
- Geo bags with a fishing platform would be good.
- Maldives Ports limited has their own equipment but for locals to earn more income, container clearance is done in the old harbor. Container clearance is also 50% cheaper compared to Male'. In future there could be more goods being traded and cleared in this area.
- New harbor upper zone is used for recreation purposes like kite surfing (around 10 kite surfers).
- Harbor roads are also used by motor racers.
- Almost every household has dinghy (small boat).
- Current design of the harbor is not a modernized harbor design.
- Breakwater design is too low.
- Harbor channel area water depth needs to be increased.

Signature of the Chair:

A handwritten signature in black ink, consisting of a series of loops and a final flourish.

Figure 1: List of participants in boat owners and fishermen meeting

Participant list (Boat Owners / fishermen) Kalthudhuffushi
Venue: USge (13 May 2024) 20:30pm

	Name	Title	Organisation	Gender	Phone	Email address	Signature	I am happy to appear in / consent environmental & communication training materials (Yes/No)
1	Hassan Riza	owner	Fishing boat	M	9141280	hassanRiza29@gmail.com		Yes
2	Abdulla Abdul Rahman	Kuroo Crew	fishing boat	M	916378	abdulrahman123@gmail.com		Yes
3	Imshadh Mohamed	owner	fishing boat	M	9110556	imshadh@gmail.com		Yes
4	Alimud Hassan	hathi Yaaru	-	M	963695	alimudin@gmail.com		Yes
5	Abobakar Hussain	fishermen	-	M	9324816			Yes
6	Abdul Latheef	fishermen	-	M	7911451			Yes
7	Ibrahim Hassan	fishermen	-	M	9638008			Yes
8	Saeed Ibrahim	fishermen	-	M	9681981			Yes
9	Abobakar Hassan	fishermen	-	M	9167171			Yes
10								
11								

Figure 2: Meeting with fishermen and boatowners on 13 May 2024



Annex 4: Grievance Recording Form*(to be made available in Dhivehi)*

The Enhancing Climate Resilience and Food Security Project welcomes suggestions, complaints, queries and comments regarding the project. We encourage persons with grievance to provide their name and contact information to enable us to get in touch for clarification and feedback.

Should you opt to include your personal details but want that information to remain confidential, please inform us by writing 'CONFIDENTIAL' above your name.

No.		GRIEVANCE RECORDING FORM	
1	Date of Grievance Reporting		
2	Location of Grievance Reporting		
CONTACT INFORMATION AND GRIEVANCE			
3	Name		
4	Gender	Male	Female
5	Age		
6	Home address		
7	Atoll, Island, Community		
8	Phone		
9	Email		
10	Complaint, comment or question – please provide details (who, what, where, how)		
11	How do you want to be reached for updates?		
12	Signature		
FOR OFFICIAL USE			
11	Registered by: (Name, position, phone number of the official registering the grievance)		
12	Mode in which grievance is received:	<input type="radio"/> Note/Letter <input type="radio"/> E-mail <input type="radio"/> Verbal/telephone	
14	Signature and date of the official recording grievance:		
15	Has AP/Complainant been handed over a copy of the grievance form?	Yes	No
16	Reviewed by: (Name, position, phone number of the official reviewing the grievance)		
17	Action taken:		
18	Whether action taken disclosed:	Yes	No
19	Means of disclosure:		

Grievances Record and Action Taken

Record Number	Date	Name and Contact Number of Complainant	Type of Complaint	Place	Status of Redress	Remarks