

# Environmental and Social Monitoring Report

Establishment of Island Waste Resource Management  
Centre – Gan, Laamu Atoll



Prepared by: Ahmed Hassaan Zuhair

Prepared for: Ministry of Tourism and Environment

December 2025

## **Table of Contents**

1	Introduction .....	1-4
1.1	Project Details .....	1-4
2	Monitoring Schedule and Compliance .....	2-5
2.1	Site Visits .....	2-5
3	Project Components .....	3-5
4	Project Progress .....	4-9
5	Implementation of Mitigation Measures.....	5-10
6	Vegetation Removal and Revegetation .....	6-12
7	Grievances .....	7-13
8	Ground Water Quality Assessment .....	8-15
9	Plan for Operationalizing the IWRMC.....	9-16
10	Conclusion.....	10-16
	Appendices .....	10-17
	Appendix 1 Proponent's Commitment to Undertake Mitigation and Environmental Monitoring .....	10-18
	Appendix 2 Substantial Project Completion Note .....	10-19
	Appendix 3. Code of Conduct for Contractor's declaration, HS items & Staff list .....	10-20
	Appendix 4 Interim EMP Monitoring Reports.....	10-21
	Appendix 5 Dredging and Reclamation Permit Issued by EPA.....	10-22
	Appendix 6 Registered Grievance During Construction Phase .....	10-23

## List of Figures

Figure 1 Gan WRMC Layout .....	3-8
Figure 2 Fire Extinguishers at the facility .....	4-9
Figure 3 Photos of Gan WRMC .....	4-9
Figure 4 Photos of Gan WRMC .....	4-10
Figure 5 Replantation location and photos .....	6-13
Figure 6 GRM board displayed at project site .....	7-14
Figure 7 GRM poster displayed in community Viber group.....	7-14

## List of Tables

Figure 1 Gan WRMC Layout .....	3-8
Figure 2 Fire Extinguishers at the facility .....	4-9
Figure 3 Photos of Gan WRMC .....	4-9
Figure 4 Photos of Gan WRMC .....	4-10
Figure 5 Replantation location and photos .....	6-13
Figure 6 GRM board displayed at project site .....	7-14
Figure 7 GRM poster displayed in community Viber group.....	7-14

## Consultant Declaration

I certify that the statements made in this Environmental and Social Monitoring Report for the establishment of Island Waste and Resource Management Centre in L. Gan, are true, accurate and complete to the best of my knowledge.



Name: Ahmed Hassaan Zuhair

EIA Consultant License Number: EIA-P(A)07/2024

Designation: Environmental and Social Safeguards Specialist of Maldives Clean Environment Project

Date: 10 December 2025

# 1 Introduction

The proposed project involves the establishment of an Island Waste and Resource Management Centre (IWRMC) at L. Gan. This facility will enhance waste management at the island level. An Environmental and Social Management Plan (ESMP) was prepared for the project and subsequently cleared by both the Environmental Regulatory Authority (ERA) (formerly EPA) and the World Bank.

Following a competitive bidding process, the project was awarded to Elite International Pvt. Ltd., and the contract agreement was signed on 28 March 2024. The project was completed on 9 November 2025.

The project proponent is the Ministry of Tourism and Environment (MoTE), and implementation is carried out by the Project Management Unit (PMU) of the World Bank-financed Maldives Clean Environment Project (MCEP).

## 1.1 Project Details

The proposed works were carried out within the 54000sqm plot allocated for the IWRMC, located on the northeastern side of Gan, where waste disposal activities are currently taking place. The land area designated for the project was approved by the Maldives Land and Survey Authority (MLSA) in 2017.

The IWRMC infrastructure was developed to meet the requirements for establishing a fully functional facility equipped with a mechanical composting system.

The center includes the following infrastructure:

### Operational Infrastructure

- Waste unloading and loading area
- Mechanical composting area with area for storage of finished compost and chipped wood
- Inorganic waste processing area
- Inorganic waste storage area
- Bulk waste storage area
- Hazardous waste storage area

### Administrative and supporting Infrastructure

- Office
- Locker and Toilet
- Store
- Groundwater well
- Septic Tank
- Rainwater pits
- Leachate collection well
- Fire safety equipment

Additional details of the project are described in the ESMP for establishment of Island Waste and Resource Management Centre in L. Gan (LAMER Group Pvt Ltd, April 2021).

## 2 Monitoring Schedule and Compliance

Riyan Pvt. Ltd. was contracted to supervise the construction works of the IWRMC, including oversight of environmental and social safeguards during the construction phase, from the start of the project until 31 May 2025. The PMU provided a reporting template for environmental and social safeguards, developed using Kobo Toolbox. Safeguards reports were submitted monthly in accordance with the agreed schedule and were verified by the PMU prior to processing interim payments.

Following 31 May 2025, environmental and social (E&S) monitoring responsibilities were taken over directly by the Environmental and Social Safeguards Specialist of the PMU.

### 2.1 Site Visits

Monthly site field visits were conducted by the Riyan supervision team and the PMU, during which environmental and social aspects were monitored. Over the entire project period, from June 2024 to November 2025, a total of 16 site visits were carried out.

## 3 Project Components

The construction phase of the project involved the following major components:

### 1. *Site preparations*

The main vegetation observed at the site consisted of bushy Sea Hibiscus trees and a mix of low shrubs. Most of the small coconut palms present were regrowth following earlier vegetation clearance. A total of 19 palms, including small and juvenile specimens, were recorded. Additionally, two immature breadfruit trees, each approximately 2 meters in height, were observed.

Site clearance had been initiated by L. Gan Council prior to the commencement of construction activities. A 2:1 replantation ratio was applied, whereby twice the number of palms and trees previously cleared will be replanted within the designated area.

### 2. *Clean-up of existing waste*

Project activities were primarily carried out on a 2,440 sqm area located west of the IWRMC plot. This area contained accumulated legacy waste that needed to be cleared before civil works could begin. Consequently, the waste was relocated to the existing waste management area situated northeast of the IWRMC plot prior to the commencement of construction activities.

### 3. *Site Demarcation*

As the eastern side of the plot is currently being used for waste management, the 2,440sqm area where the majority of the civil works activities, excluding fencing works, were proposed to take place was clearly demarcated, after relocating the existing legacy waste. This project site is accessible only to the contractor's workers.

#### **4. Construction of IWRMC**

The following works were carried out as part of construction of the IWRMC:

##### **Operational Infrastructure:**

- **Waste unloading, loading and weighing area**
  - A roofed area of 72m<sup>2</sup> with concrete slab designated for weighing and sorting of incoming waste to organic and inorganic fractions.
- **Inorganic waste processing area**
  - A roofed area with concrete slab where waste will be further segregated into plastic, metal, glass etc. and processed via baling, compaction and crushing. This processing area has an approximate area of 183m<sup>2</sup>.
- **Processed inorganic waste storage area**
  - A roofed area with concrete slab where the processed inorganic waste will be stored. The storage area has an area of 279m<sup>2</sup>. The design considers storage of such waste for 4 – 6 months, which will then have to be transferred to the Regional Waste Management Facility (RWMF).
- **Bulk waste storage area**
  - A roofed area of approximately 118m<sup>2</sup>, with concrete slab, designated for the storage of bulk waste such as old furniture, roofing sheets etc.
- **Hazardous waste storage area**
  - A fully enclosed room of 31m<sup>2</sup> area, with a roof, concrete slab, 4 walls and a gate, where the received hazardous waste will be stored prior to its final disposal at a RWMF. Appropriate hazard, flammable liquid and warning signage will be installed.
- **Organic waste composting area**
  - A 320 m<sup>2</sup> fully enclosed, roofed area with a concrete slab and brick walls is proposed in the design to expand operations for in-vessel composting. This is planned as a future development and is not included under the current civil works contract.

##### **Administrative and Supporting Infrastructure**

- **Office / Store / Toilet**
  - These areas provide workspace and essential utilities as well as resting area for operational and administrative staff.
- **Septic Tank**
  - A septic tank was constructed in the open area adjacent to the proposed toilet to temporarily manage and dispose of wastewater generated during operations.
  - This tank will be connected to the island's sewer network once the network is extended to reach the IWRMC area.
- **Groundwater Well**
  - A groundwater well was constructed at the open area in front of the proposed store. Water for operations will be drawn from this well.
- **Water connection**
  - Internal water piping and taps were laid to connect water to the different parts of the IWRMC. A water pump was installed to connect water to the toilet, wash area, waste sorting / processing areas and the mechanical composting area from the groundwater well.

- **Installing drains**
  - Drains were installed at the waste unloading and loading areas, the waste processing areas, the waste storage areas, and the mechanical composting area, and these were subsequently connected to the septic tank. This system will also enable the collection and drainage of any leachate that may be generated. However, with the proposed composting method, the volume of leachate is expected to be comparatively minor when compared to windrow-based composting.
- **Rainwater pits**
  - Rainwater pits were installed throughout the open area of the IWRMC to deal with potential storm water produced during rainy seasons.
- **Connecting Electricity**
  - 3 phase electricity required for the operations of the IWRMC was sourced from the island powerhouse. A 4-core power cable was laid from the nearest distribution box (at southern side).
- **Fire safety equipment**
  - Fire safety equipment was supplied and installed as part of the contract, which essentially includes:
    - 50KG DCP Trolley 2 nos.
    - 50LTR Foam Trolley 1 no.
    - Wet Chemical 6Ltr with Cabinet for hazardous waste area 1 no.
    - Water 9Ltr with Cabinet for Office Area – Outside 1 no.
    - CO2 2KG with Cabinet for Office Area – Outside 1 no.

## **5. Soil filling and leveling works (additional works)**

Soil filling of the entire site was necessary to ensure the viability of the IWRMC, given the site's large size and its functional requirements. This need was identified during project execution. As soil filling was outside the scope of the original contractor's works, a separate contract was awarded for this purpose. The contract covered equipment mobilization, dredging, soil transportation, grading, compaction, and leveling of the entire site to a depth of +600mm.

The sand used for filling was dredged from a borrow area approved by the ERA for the Island Council to source sand for developmental projects within L. Gan. This area is covered in the "EIA for designating a sand sourcing area for developmental projects and basic community needs in L. Gan", where the council is allowed sourcing of 25,000 - 45,000cbm of sand annually for a period of 5 years (from 14 September 2024 until September 2025) from the dredging location at the northern tip of the island, subject to obtaining a separate yearly Dredging and Reclamation Permit from the ERA.

For 2025, the ERA issued a dredging and reclamation permit to L. Gan Council allowing a total of 45,000cbm to be dredged for community and developmental needs, of which 4,000cbm was specifically authorized for IWRMC purposes. A copy of the permit is provided in **Appendix 5**.

For the proposed filling and leveling work of the IWRMC, 3,398cbm was used.





## 4 Project Progress

All the major construction works of the project were completed on 09<sup>th</sup> November 2025, including plumbing, electrical works and fixing of fire safety equipment.

**Table 1** Types of Fire Safety Equipment Supplied

Item no:	Equipment	Quantity	Location
1	50KG DCP Trolley	2	Collection bay
2	50 Ltr Foam Trolley	1	Collection bay
3	Wet Chemical 6 Ltr with Cabinet	1	Hazardous Waste Area
4	Water 9 Ltr with Cabinet	1	Outside office
5	CO2 kg with Cabinet	1	Outside office



**Figure 2** Fire Extinguishers at the facility



**Figure 3** Photos of Gan WRMC



**Figure 4** Photos of Gan WRMC

## 5 Implementation of Mitigation Measures

The site conditions were well managed throughout the construction phase of the project, with no major non-compliance issues observed during monitoring. The non-conforming issues identified during the site visits were relatively minor and were effectively remediated in a timely manner. These issues are listed below:

**Table 2 .** Details of Non-Compliance Issues Identified

No.	Entry Date	Description of the Risk, Challenge, Issue	Actions Taken by Consultant/PMU	Status	Date Resolved
1	4 Aug-24	No bins present for disposing of general waste to be generated by the workers are noted on site.	Contractor has been instructed to provide bin for general waste to be generated by workers	Resolved	25 <sup>th</sup> Nov 2024
2	4 Aug-24	Lack of PPE usage is observed to all workers were present on site.	Contractor has instructed to strictly implement the PPE usage at all times while working on site.	Resolved	31 <sup>st</sup> Aug 2024
3	4 Aug-24	Site demarcation on site was not done.	Contractor has instructed to demarcate the construction site and keep maintain	Resolved	24 <sup>th</sup> August 2024

			throughout the period of construction period.		
4	23- Sep 2024	Site demarcation was not properly maintained as a construction site. (recurrence)	Contractor has instructed on site to properly maintain this demarcation at construction site	Resolved	25 <sup>th</sup> Nov 2024
5	23- Sep 2024	Some of proposed staff as per the list shared by the Contractor have expired work permit/ work visa	Contractor has been reminded via mail dated 3 <sup>rd</sup> September 2024 to renew the expired work permit and work visas to those staffs currently deployed on site.	Resolved	30 <sup>th</sup> Dec 2024
6	3 <sup>rd</sup> Sep 2024	Resting area and shared toilet for labors use are not available on site, Sanitation facilities is necessary on L. Gan site due to the staff's accommodation are too far to the construction site. And this concern has been flagged during the WB team's recent visit to the site.	MCCEE team informed the Contractor that the Council of L. Gan that there's a potential for them to make such an arrangement and contractor should approach and talk to them on this matter	Resolved	4 <sup>th</sup> Sep 2024
7	22 <sup>nd</sup> Oct 2024	Lack of portable fire extinguishers on-site	Contractor has been instructed to provide fire extinguisher and must be installed on site prior to the next inspection.	Resolved	23 <sup>rd</sup> Dec 2024
8	22 <sup>nd</sup> Oct 2024	Cleanliness, sanitary and neatness of the worker's accommodation are in Marginally Satisfactory level which needs for improvements.	Contractor has instructed to improve the cleanliness, sanitary and neatness of accommodation	Resolved	25 <sup>th</sup> Nov 2024
9	25 <sup>th</sup> Nov 2024	Construction materials are not properly stockpiled & covered	Contractor has been instructed to stock properly and cover the construction materials	Resolved	25 <sup>th</sup> Feb 2025
10	23 <sup>rd</sup> Dec 2024	5 workers are not wearing complete Personal Protective Equipment (PPE) and noted on site during the latest site visit.	Contractor has been instructed to strictly implement the PPE usage at all times while working on site.	Resolved	26 <sup>th</sup> Jan 2025
11	26 <sup>th</sup> Jan 2025	Some of proposed staff as per the list shared by the Contractor don't have valid	Contractor has been reminded via mail dated 2 <sup>nd</sup> Feb 2025 to renew the expired work permit	Resolved	6-Mar-2025

		work permit/ work visa	and work visas to those staff currently deployed on site.		
		Lack of fire extinguisher on site	Site supervisor notified on site on 26 August 2025 and the contractor informed via email to install fire extinguisher via email on 27 August 2025.	Resolved	1 <sup>st</sup> Sep 2025

## 6 Vegetation Removal and Revegetation

The main vegetation observed at the site comprised bushy Sea Hibiscus trees and a mix of low shrubs. Most of the small Coconut palms present were regrowth following initial vegetation clearance. A total of 17 palms (including small and juvenile specimens) were recorded. Two immature breadfruit trees, approximately 2 meters in height, were also observed. The vegetation present were publicly owned (by the Island Council); thus, not requiring compensation.

2:1 replantation was carried out by the island council at the northern tip of the island, east to the main road (causeway). A total of 40 trees were planted as per the information provided by the council, which was verified by the PMU during the 13<sup>th</sup> November 2025 site visit.

**Table 3** Vegetation Information

Details of Vegetation/ Replantation /Translocated	Quantity
Juvenile medium Coconut palm	17
Immature breadfruit	2
Number of trees translocated	0
Number of trees Removed/ Chopped	19
Number of trees Replanted	40



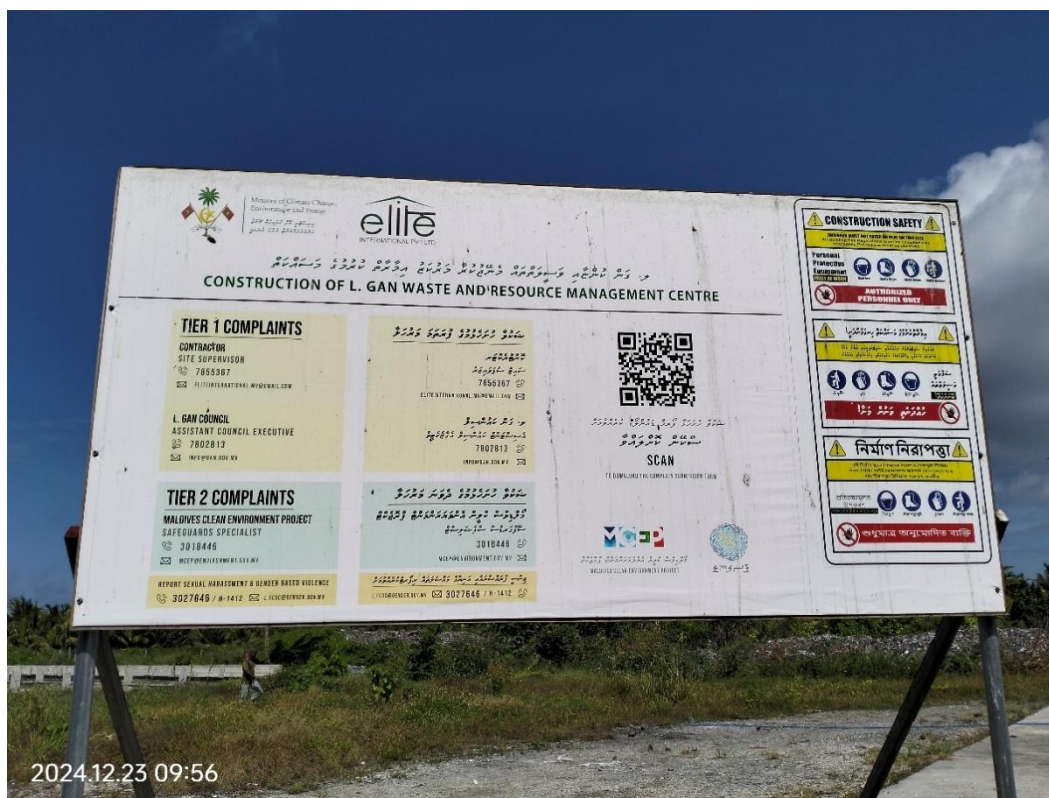


**Figure 5** Replantation location and photos

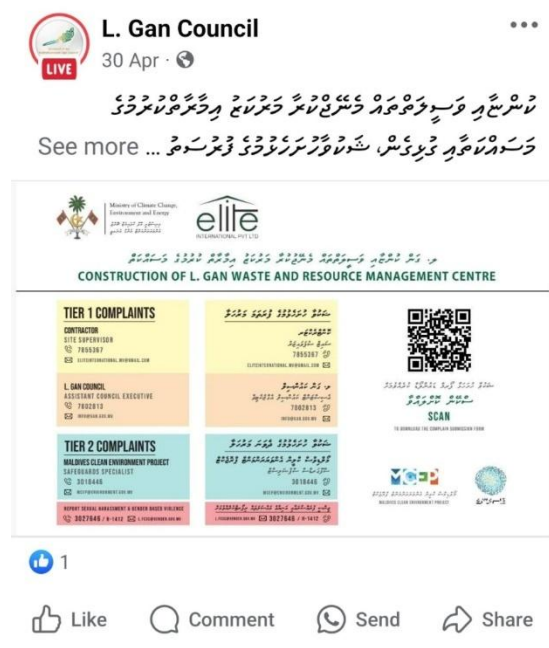
## 7 Grievances

The Grievance Redress Mechanism (GRM) of MCEP was fully functional at L. Gan. The Council appointed one of its employees as the waste management focal point responsible for managing Tier 1 grievances. Any grievances that could not be resolved at the Island Council level were to be referred to the PMU (Tier 2). Contact details and a QR code for accessing the online complaint form were displayed at the project site and in community Viber group maintained by the Council.

Two grievances were recorded in the online GRM log sheet on 21 August 2024 and 25 February 2025. Both grievances were resolved by the party responsible, with detailed documentation provided in **Appendix 6**.



**Figure 6** GRM board displayed at project site



**Figure 7** GRM poster displayed in community Viber group

## 8 Ground Water Quality Assessment

Groundwater samples were collected from the locations specified in the ESMP report. All parameters outlined in the ESMP were tested, as presented in Table 3. Temperature, physical appearance, pH, electrical conductivity, and total dissolved solids (TDS) were measured using a Hanna multiparameter instrument, while nitrate levels were analyzed at the MWSC Water Quality Assurance Laboratory.

Most of the parameters were found to be within the normal range. However, nitrate levels at the IWRMC site showed an increase compared to the initial test results. This rise may be attributed to possible contamination sources such as sewage infiltration, the use of nitrogen-based fertilizers in nearby agricultural areas, or the decomposition of plant debris.

**Table 4** Results of Groundwater Quality Assessment

Name of Island	L. Gan			
Sampling Location	IWRMC Site	Control Site	IWRMC Site	Control Site
Sample Type	Ground Water	Ground Water	Ground Water	Ground Water
Sampling Date & Time	24/10/2024 9:32:00 AM	24/10/2024 09:51AM	15-6-2025 @ 13:43PM	15-6-2025 @ 15:00PM
Nos. of GW Testing	1st GW testing		2nd GW testing	
Parameters	Analysis Results			
	Tested Using Hanna Multiparameter probe.			
Temperature (°C)	30	30	28.5	27
pH	6.7	7.25	10.13	7.62
Electrical Conductivity (µS/cm)	1292	582	582	616
Total Dissolved Solids (ppm)	646	248	290	306
	Tested at MWSC Laboratory			
Physical Appearance	Pale yellow with particles	Clear with particles	Pale yellow with particles	Clear with particles
Nitrate (mg/L)	4.2	5.9	10.2	2.6



## 9 Plan for Operationalizing the IWRMC

A Memorandum of Understanding (MoU) will be signed between the MCCEE and L. Gan Council prior to the official handover of IWRMC operations to the Council.

The MoU requires the Council to complete the necessary registration and obtain a waste management permit from the URA prior to the commencement of IWRMC operations. It also outlines conditions such as maintaining an adequate stock of critical spare parts, providing health and safety gear, and conducting ESMP monitoring during the operational phase.

The MoU outlines the Council's roles and responsibilities for managing the IWRMC in accordance with national environmental laws and regulations.

## 10 Conclusion

The establishment of the IWRMC at L. Gan was completed on 09 November 2025. The contractor for the project was Elite International Pvt. Ltd.

ESMP monitoring conducted for the project confirms that construction of the IWRMC was carried out in compliance with the ESMP, with the majority of agreed mitigation measures satisfactorily implemented. Some non-compliance issues were observed during the construction phase; however, these were minor in nature and were resolved prior to the completion of the works. Details of these observations are highlighted in this report.

Two (2) grievances were recorded during the construction phase of the project, both of which were resolved by the responsible stakeholder. The grievances and the corresponding corrective actions are documented in **Appendix 5**.

A total of 19 vegetation transecting the proposed site were removed, and 40 new plants were replanted to meet the 2:1 replantation requirement. Vegetation clearance was conducted prior to the commencement of construction activities.

A Memorandum of Understanding (MoU) outlining the Council's roles and responsibilities in managing the IWRMC in accordance with national environmental laws and regulations will be signed between Gan Council and the Ministry of Tourism and Environment (MoTE).

Responsibility for monitoring during the operational phase lies with the operator, which is the Island Council. Operational monitoring shall be conducted six months after the commencement of operations.

## **Appendices**

# Appendix 1 Proponent's Commitment to Undertake Mitigation and Environmental Monitoring



Ministry of Environment  
Male', Republic of Maldives.



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ދާއިރާ: ބޭރުގެ ގުޅިގެން

Date: 14 March 2021

No: 438-WMPC/203/2021/35

Mr. Ibrahim Naeem,  
Director General,  
Environmental Protection Agency,  
Green Building, Handhuvaaree Hingun, Maafannu,  
Male', 20392, Maldives.

Dear Sir,

## Sub: Commitment to undertake Mitigation and Environmental Monitoring

The Environmental and Social Management Plan (ESMP) prepared for the proposed establishment of the Island Waste and Resource Management Centre (IWRMC) in L. Gan has been prepared in accordance with the EIA Regulations 2012 and its amendments, issued by the Ministry of Environment.

We would like to confirm our commitment to the proposed mitigation measures and the monitoring programme that has been highlighted in the ESMP report prepared for the above referenced project.

Sincerely,

Amru Adam,  
Assistant Director

Green Building, Handhuvaaree Hingun,  
Maafannu, Male', 20392, Republic of Maldives.

+ (960) 301 8300  
[www.environment.gov.mv](http://www.environment.gov.mv)

Page 1 of 1

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ދާއިރާ: ބޭރުގެ ގުޅިގެން

[secretariat@environment.gov.mv](mailto:secretariat@environment.gov.mv)

[www.facebook.com/environment.gov.mv](https://www.facebook.com/environment.gov.mv)

## **Appendix 2 Substantial Project Completion Note**

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**Re: IWRMC L.Gan work complete**

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**From** Aminath Thaanees Shiran <thaanees.shiran@environment.gov.mv>

**Date** Sun 11/9/2025 2:01 PM

**To** ELITE INTERNATIONAL PVT LTD <eliteinternational.mv@gmail.com>

**Cc** Ismail Shihab <ismail.shihab@environment.gov.mv>; Eyman Ismail <eyman.ismail@environment.gov.mv>; Jumaina Hassan <jumaina.hassan@environment.gov.mv>; MCEP Procurement | Min. of Environment, Climate Change and Technology, MV <mcep.procurement@environment.gov.mv>; Ahmed Hassaan <ahmed.hassaan@environment.gov.mv>

Dear Jailab,

Thank you for the update. We will be visiting the site on Thursday, 13<sup>th</sup> November to carry out the final inspection. Kindly ensure that the site representative is present during the visit.

Regards,  
Aminath Thaanees Shiran

---

**From:** ELITE INTERNATIONAL PVT LTD <eliteinternational.mv@gmail.com>

**Sent:** Sunday, November 9, 2025 12:36 PM

**To:** Aminath Thaanees Shiran <thaanees.shiran@environment.gov.mv>

**Cc:** Ismail Shihab <ismail.shihab@environment.gov.mv>; Eyman Ismail <eyman.ismail@environment.gov.mv>; Jumaina Hassan <jumaina.hassan@environment.gov.mv>; MCEP Procurement | Min. of Environment, Climate Change and Technology, MV <mcep.procurement@environment.gov.mv>; Ahmed Hassaan <ahmed.hassaan@environment.gov.mv>

**Subject:** IWRMC L.Gan work complete

Dear Aminath,

We would like to inform you that the construction of a new waste management center in L. Gan island has been completed.

Best regards

--

Jailab Mohamed  
Managing Director

G,Hurasfaru | Lonuziyarai Magu | Male' 20609 | Republic of Maldives |  
t: 9609996580 | e: [eliteinternational@gmail.com](mailto:eliteinternational@gmail.com)

## **Appendix 3. Code of Conduct & Staff list**

## Company Code of Conduct Implementing ESHS and OHS Standards Preventing Gender Based Violence

The company is committed to ensuring that the project is implemented in such a way which minimizes any negative impacts on the local environment, communities, and its workers. This will be done by respecting the environmental, social, health and safety (ESHS) standards, and ensuring appropriate occupational health and safety (OHS) standards are met. The company is also committed to creating and maintaining an environment where children under the age of 18 will be protected, and where Sexual Exploitation and Abuse (SEA) and sexual harassment have no place. Improper actions towards children, SEA and sexual harassment are acts of Gender Based Violence (GBV) and as such will not be tolerated by any employee, sub-contractors, supplier, associate, or representative of the company.

Therefore, to ensure that all those engaged in the project are aware of this commitment, the company commits to the following core principles and minimum standards of behavior that will apply to all company employees, associates, and representatives, including sub-contractors and suppliers, without exception:

### **General**

1. The company—and therefore all employees, associates, representatives, sub-contractors and suppliers—commits to complying with all relevant national laws, rules and regulations.
2. The company commits to full implement the Environmental and Social Management Plan (ESMP) which forms part of the contract.
3. The company commits to treating women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. Acts of GBV are in violation of this commitment.
4. The company shall ensure that interactions with local community members are done with respect and non-discrimination.
5. Demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behavior are prohibited among all company employees, associates, and its representatives, including sub-contractors and suppliers.
6. The company will follow all reasonable work instructions (including regarding environmental and social norms).
7. The company will protect and ensure proper use of property (for example, to prohibit theft, carelessness or waste).

### **Health and Safety**

8. The company will ensure that the project's OHS Management Plan is effectively implemented by company's staff, as well as sub-contractors and suppliers.
9. The company will ensure that all persons on-site wear prescribed and appropriate personal protective equipment, preventing avoidable accidents, and reporting conditions or practices that pose a safety hazard or threaten the environment.
10. The company will prohibit the use of alcohol, narcotics or other substances which can impair faculties at all times.



11. The company will ensure that project's Grievance Redress Mechanism (GRM) is implemented.
12. The company will not hire children under the age of 18 for construction work, or allow them on the work site, due to the hazardous nature of construction sites.
13. The company will ensure that adequate sanitation facilities are available on site and at any worker accommodations provided to those working on the project.

## **Gender Based Violence**

14. Acts of GBV constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment and, if appropriate, referral to the Police for further action.
15. All forms of GBV, are unacceptable, regardless of whether they take place on the work site, the work site surroundings, at worker's camps or within the local community.
16. Sexual harassment of work personnel and staff (e.g. making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature) are acts of GBV and are prohibited.
17. Sexual favors (e.g. making promises of favorable treatment such as promotions, threats of unfavorable treatment such as losing a job, payments in kind or in cash dependent on sexual acts) and any form of humiliating, degrading or exploitative behavior are prohibited.
18. The use of prostitution in any form at any time is strictly prohibited.
19. Sexual contact or activity with children under 18—including through digital media—is prohibited. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
20. Unless there is full consent<sup>1</sup> by all parties involved in the sexual act, sexual interactions between the company's employees (at any level) and members of the communities surrounding the work place are prohibited. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered "non-consensual" within the scope of this Code.
21. In addition to company sanctions, legal prosecution of those who commit acts of GBV will be pursued if appropriate.
22. All employees, including volunteers and sub-contractors are highly encouraged to report suspected or actual acts of GBV by a fellow worker, whether in the same company or not. Reports must be made in accordance with project's GBV Allegation Procedures.
23. Managers are required to report and act to address suspected or actual acts of GBV as they have a responsibility to uphold company commitments and hold their direct reports responsible.

## **Implementation**

To ensure that the above principles are implemented effectively the company commits to:

24. Ensuring that all managers sign the project's 'Manager's Code of Conduct' detailing their responsibilities for implementing the company's commitments and enforcing the responsibilities in the 'Individual Code of Conduct'.
25. Ensuring that all employees sign the project's 'Individual Code of Conduct' confirming their agreement to comply with ESHS and OHS standards, and not to engage in activities resulting in GBV, child endangerment or abuse, or sexual harassment.
26. Displaying the Company and Individual Codes of Conduct prominently and in clear view at

workers' camps, offices, and in public areas of the work space. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.

27. Ensuring that posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.
28. Ensuring that an appropriate person is nominated as the company's 'Focal Point' for addressing ESHS, OHS and GBV issues.
29. Ensuring that all employees are properly briefed and that they are familiar with the company's commitments to ESHS and OHS standards, and the project's GBV Codes of Conduct.

## Sanction

In case of a major breach of this Code of Conduct, the client is entitled to take disciplinary action against the company (as per the contract) which could include:

30. Informal warning.
31. Formal warning.
32. Withholding of payments.
33. Deduction from retention payment.
34. Termination of contract.
35. Report to the Police if warranted.

*I do hereby acknowledge that I have read the foregoing Company Code of Conduct, and on behalf of the company agree to comply with the standards contained therein. I understand my role and responsibilities to support the project's OHS and ESHS standards, and to prevent and respond to GBV. I understand that any action inconsistent with this Company Code of Conduct or failure to act mandated by this Company Code of Conduct may result in disciplinary action.*

Company name: Elite International Pvt Ltd

Signature: \_\_\_\_\_

Printed Name: Jailab Mohamed

ID or PP No: A159974

Date: 18/03/2018



## FORM 1: PROJECT TEAM INFORMATION

Project Title: Upgrading of Waste and Resource Management Center at Gan, Laamu Atoll

Date: 18<sup>th</sup> March, 2024

Contractor: Elite International Pvt Ltd

#	Staff Name	Role	Nationality	ID Card / Work Permit No	Age	COVID19 Vaccination (Specify details of dosage completed)
1	Hussain Afeef	Work Supervisor	Maldivian	A135714	38	
2	Ahmed Riza	Health and Safety Supervisor	Maldivian	A135827	38	
3	Mohamed Sham Moosa	Mason	Maldivian	A135184	36	
4	Shaid Mohamed	Mason	Maldivian	A114027	35	
5	Mohamed rashaadh	Mason	Maldivian	A135789	40	
6	Hussain shihaam	Mason	Maldivian	A158982	37	
7	Ahmed Shareef	Labour	Maldivian	A135920	35	
8						
9						
10						

*Note: This form shall be completed and submitted along with copies of National Identification Cards / Passports and Work Permits of the project team prior to mobilization to the site. The contractor should only proceed with mobilization after attaining approval in writing from the Ministry/PMU for the project team.*

### Details of the Respondent

Name: Jailab Mohamed

Designation: Managing Director

Signature:

Company Seal:



## **Appendix 4 Interim EMP Monitoring Reports**

## Consultant Declaration

The information provided in this monthly ESMP monitoring form for the construction phase of Island Waste Recovery Management Centre (IWRMC) in the Island of L. Gan is acquired at the time of inspection, availability of informants on-site and is factual to the best of my knowledge.

Name: Michael C. Rubia

Designation: Environmental & Social Safeguard Officer

Signature:



Company: Riyan Private Limited

Date Submitted: 15<sup>th</sup> May 2025

Date of revision:

Title of Report: Interim ES Monitoring Report -April 2025

# ESMP Monitoring Construction Phase

## Section 1: General Information

PROJECT ZONE \*

- ☐ Zone 2
- ☐ Zone 4
- ☒ Zone 5

ATOLL

- ☐ Thaa
- ☒ Laamu

ISLAND NAME

Gan

## Section 2: Sub Project Details

TYPE OF SUB PROJECT? \*

*Indicate information pertaining to the proposed technology*

- ☐ IWRMC Manual Composting
- ☒ IWRMC Composting Machine
- ☐ IWRMC Anaerobic Digestion
- ☐ Other

SUB-PROJECT DETAILS

- ☒ Construction of a new center
- ☐ Upgrading of an existing center

**SUB PROJECT LOCATION?***Include Atoll and select project site via map*

1.923281 73.549326 -88.5 100

latitude (x.y °)

1.923281

longitude (x.y °)

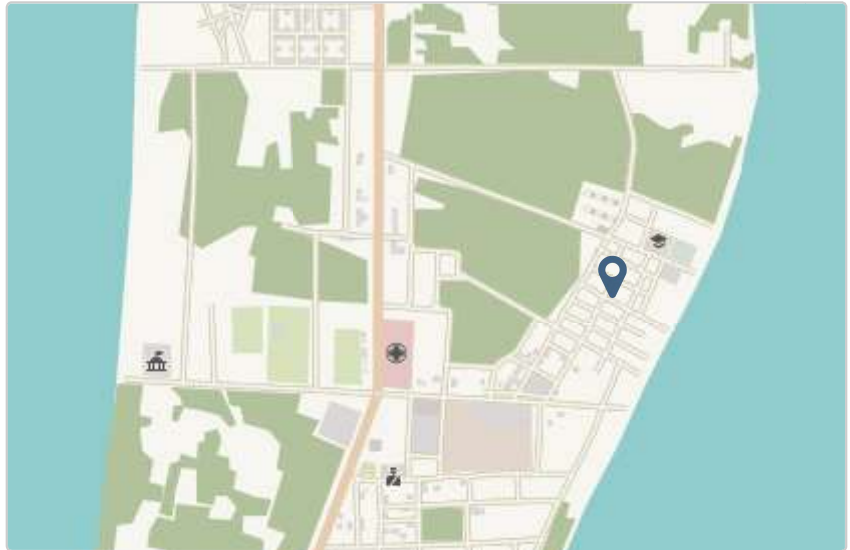
73.549326

altitude (m)

-88.5

accuracy (m)

100

**PHYSICAL PROGRESS***Provide Percentage*

35% (April 2025)

**Section 3: Storage of Hazardous Chemicals during Construction****ARE FUEL USED FOR PROJECT PURPOSES STORED IN SEALED CONTAINERS?***This would mostly include oil and diesel for the cement mixing machine*

- ☐ Yes
- ☐ No
- ☒ Not Applicable / Observed

**WERE ALL HAZARDOUS CHEMICAL CONTAINERS ( PAINTS, THINNERS, LUBRICANTS) STORE IN CLOSED CONTAINERS AND PLACED ON A IMPERMEABLE SURFACE (EITHER A CONCRETE SLAB, CONTAINED BOX OR LINED AND ISOLATED AREA?)**

- ☐ Yes
- ☐ No
- ☒ Not Applicable / Observed

WERE ANY CHEMICALS STORED CLOSE TO ELECTRICAL OUTLETS, OR ANY AREAS WHERE THERE IS A RISK OF FIRE AND EXPLOSION?

- ☐ Yes
- ☒ No

## Section 4: Noise Pollution Management Practices

WHAT MITIGATION MEASURES HAVE BEEN APPLIED BY THE CONTRACTOR TO REDUCE NOISE POLLUTION?

- ☒ Construction Activity Only During Day Time (8.00am-6.00pm)
- ☐ Noise Barrier Installed
- ☐ Workers involved in either drilling, welding or noisy machinery operation were wearing ear mufflers
- ☐ Other measures used by contractor

WAS WAS THE NOISE LEVEL OBSERVED ON THE SITE DURING THE MONITORING VISIT?

- ☐ Very Loud ( heavy machinery in operation, continuous drilling and construction noise, not bearable, loud labor gangs)
- ☐ Moderate ( normal construction site operation, bearable but moderately noisy)
- ☒ Low levels of noise (can hear speech over sound, low levels of noise at site)

## Section 5: Air Quality and Dust

ARE VEHICLES USED FOR TRANSPORTING MATERIAL FROM HARBOUR TO PROJECT SITE?

- ☐ Yes
- ☒ No

HOW WAS MATERIALS TRANSFERRED TO THE SITE?

- ☒ Covered
- ☐ Not Covered
- ☐ Not Observed

ARE MACHINERIES USED WELL TUNED / SERVICED?

*Machines are operating without emissions of smoke or fumes*

- ☐ Yes
- ☐ No
- ☒ Not Applicable / Not used



DID YOU OBSERVE HIGH LEVELS OF DUST GENERATED IN THE WORK SITE?

- ☐ Yes
- ☒ No

ATTACH PHOTO OF THE SITE TO INDICATE GROUND CONDITION

IMG\_20250422\_124227-12\_48\_29.jpg



ARE STOCKPILED CONSTRUCTION MATERIALS COVERED?

- ☒ Yes
- ☐ No

ATTACH PHOTO OF HOW MATERIALS ARE STOCKPILED

17453081371209054006460642386274-12\_49\_3.jpg



IS THE CONTRACTOR OPEN BURNING ANY WASTE ON THE SITE OR NEAR THE SITE?

☐ Yes

☒ No

DID YOU NOTICE ANY FUMES OR BAD SMELLS FROM THE SITE BEING GENERATED VIA THE USE OF CHEMICALS?

☐ Yes

☒ No

## Section 6: Source of Sand

IS SAND SOURCED FOR CONSTRUCTION IN COMPLIANCE WITH NATIONAL LAWS AND REGULATION?

*(Sand should not be sourced from the beach or lagoon of an inhabited island, tourist resort, or any protected island. This includes the area of the island designated for sand mining of local public use)*

- ☒ Yes  
☐ No

PROVIDE PHOTOGRAPHIC EVIDENCE

*Attach a photograph of sand bags*

1742972955391-18\_41\_9.jpg



## Section 7: Waste Management

IS CONSTRUCTION AND DEMOLITION WASTE (C&D) AND/OR GREEN WASTE GENERATED FROM THE PROJECT?

*If unsure, ask the Site Supervisor for verification*

- ☐ Yes  
☒ No

IS THERE EVIDENCE OF LITTERING IN AND AROUND THE SITE?

*Walk around the site and do a visual inspection*

- ☐ Yes  
☒ No

A BIN IS PRESENT FOR DISPOSING GENERAL WASTE GENERATED BY WORKERS?

- ☒ Yes
- ☐ No

ATTACH PHOTOGRAPHIC EVIDENCE

1745308840923482771573393357370-13\_1\_5.jpg



## Section 8: Impacts on Natural Environment

DOES THE SITE CONTAIN ANY SIGNIFICANT VEGETATION?

*Only large trees and coconut palms are referred here*

- ☐ Yes
- ☒ No

## Section 9: General Health and Safety

IS THE SITE DEMARCATED AS A CONSTRUCTION SITE?

- ☒ Yes
- ☐ No

WHICH METHOD IS USED TO DEMARCATATE THE SITE?

- ☐ Taping
- ☒ Fencing
- ☐ Hoarding



ATTACH A PHOTOGRAPH OF SITE DEMARCATION

17453081811354571146462446815701-12\_49\_46.jpg



IS NO ENTRY SIGN BOARD PRESENT?

☒ Yes

☐ No

ATTACH A PHOTOGRAPH OF NO ENTRY SIGN BOARD

17453089113817476437777657454174-13\_2\_1.jpg



IS SAFETY SIGN BOARD WITH PPE REQUIREMENT PRESENT?

☒ Yes

☐ No

ATTACH A PHOTOGRAPH OF PPE SIGN BOARD

17453089441346585204863940399922-13\_2\_30.jpg



## Section 10: Occupational Health and Safety

TO WHAT LEVEL ARE SAFETY GEARS / PERSONAL PROTECTIVE EQUIPMENT (PPES) BEING USED?

- ☒ Satisfactory (All workers are wearing dust masks, helmets, covered shoes, luminous vests and gloves at minimal while working in the site.)
- ☐ Marginally Satisfactory (About 50% of workers are wearing dust masks, helmets, covered shoes, luminous vests and gloves at minimal while working in the site) U-
- ☐ Unsatisfactory (Less than 20% workers are wearing dust masks, helmets, covered shoes, luminous vests and gloves at minimal while working in the site)

WHAT ARE THE TYPES OF PPES OBSERVED BEING USED BY THE SITE WORKERS?

- ☒ Boots/Covered Shoes
- ☒ Hard hats
- ☐ Ear Mufflers ( Workers operating machinery or drilling)
- ☐ Goggles (workers, drilling, welding or using sharp machinery)
- ☐ Gloves- Thick latex
- ☐ Masks
- ☐ Safety Harnesses
- ☒ Luminous Jackets
- ☐ Others

ATTACH A PHOTOGRAPH OF WORKERS WITH BOOTS/COVERED SHOES

L. Gan-11\_36\_40.jpg



ATTACH A PHOTOGRAPH OF WORKERS WITH HARD HATS

L. Gan Photo\_15-05-2025-11\_36\_47.jpg





ATTACH A PHOTOGRAPH OF WORKERS USING LUMINOUS JACKETS

L. Gan Photo\_15-05-2025-11\_36\_51.jpg



## Section 11: Management of COVID19

IS THE COUNTRY UNDER A NATIONAL PUBLIC HEALTH EMERGENCY?

- ☐ Yes
- ☒ No

## Section 12: Working Conditions and Labor

HOW IS FOOD ARRANGEMENTS BEING MADE FOR THE CONTRACTOR'S WORKERS?

*Ask the Site Supervisor and / or workers at the site*

- ☐ Monthly allowance
- ☒ Contractor

HOW MANY MEALS / BREAKS ARE PROVIDED PER DAY

*Ask the Site Supervisor and / or workers at the site*

3

WHAT ARE THE STANDARD PER DAY WORKING HOURS?

8

SPECIFY WORK START TIME

08:00

## SPECIFY WORK END TIME

16:00

## HOW IS ACCOMMODATION BEING ARRANGED?

*Ask the site supervisor and / or workers at the site*

- ☒ Rented house
- ☐ Temporary accommodation block
- ☐ Single Room

## WAS STAFF ACCOMMODATION CHECKED DURING MONITORING?

- ☐ Yes
- ☒ No

## AT THE WORK SITE DO THE LABOR HAVE A RESTING AREA WITH ADEQUATE DRINKING WATER SUPPLIES?

*Ask the Site Supervisor for verification*

- ☒ Yes
- ☐ No

## Section 13: Fire Safety

IS A PORTABLE EXTINGUISHER PRESENT AT THE SITE?

- ☒ Yes
- ☐ No

ATTACH PHOTOGRAPHIC OF EXTINGUISHER

F.E-19\_10\_48.jpg



OTHER FIRE SAFETY PRECAUTIONS TAKEN

- ☒ No open electrical wires are found
- ☐ Electrical wires installed by certified person

## Section 14: Sociocultural Issues

WHAT IS THE TOTAL NUMBER OF WORKERS RECRUITED FOR THE PROJECT?

7

ARE ANY FEMALE WORKERS RECRUITED FOR THE PROJECT?

- ☐ Yes
- ☒ No

SPECIFY THE NUMBER OF LOCAL WORKERS

5

SPECIFY THE NUMBER OF EXPATRIATE WORKERS

3

DOES ALL THE EXPATRIATE WORKERS HAVE VALID WORK PERMITS AND WORK VISAS?

☐ Yes

Please note that this information is yet to be shared by the Contractor.

☐ No

ARE ALL WORKERS ABOVE THE AGE OF 18?

Verify via the work permits / National ID cards and confirm

☒ Yes

☐ No

## Section 15: Grievance Redress Mechanism (GRM)

IS PROJECT BOARD WITH GRM INFORMATION PRESENT AT THE SITE?

☒ Yes

☐ No

ATTACH PHOTOGRAPH OF THE GRM BOARD

March Pc\_02-19\_4\_15.jpg



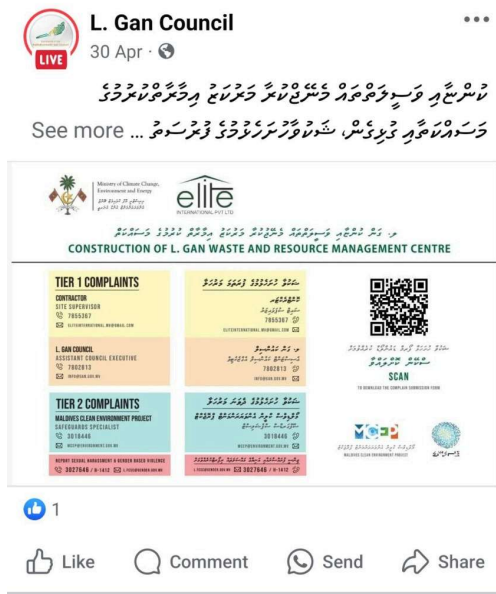
ARE GRM POSTERS PRESENT IN THE ISLAND COUNCILS NOTICE BOARD AND IN PUBLIC PLACES?

☒ Yes

☐ No

## ATTACH PHOTOGRAPHIC EVIDENCE

L. Gan\_ GRM Poster-18\_55\_31.jpg



## ATTACH PHOTOGRAPHIC EVIDENCE

Click here to upload file. (&lt; 5MB)

## ATTACH PHOTOGRAPHIC EVIDENCE

Click here to upload file. (&lt; 5MB)

## WAS ANY GRIEVANCE RELATED TO THE FOLLOWING ISSUES RECEIVED?

- ☐ CASE OF GENDER BASED VIOLENCE (GBV) / Sexual harassment (SH) / Sexual Exploitation and Abuse (SEA)
- ☐ CASE OF THEFT
- ☐ CASE OF VIOLENCE
- ☐ CASE OF MISCONDUCT BY PROJECT WORKERS
- ☐ CASE OF MAJOR ENVIRONMENTAL IMPACT (SPILL, FIRE Etc)

Section 16: Status of Stakeholder Consultations

HAVE FURTHER STAKEHOLDER CONSULTATIONS BEEN CARRIED OUT?

- ☐ Yes
- ☒ No

IF NO, PROVIDE THE PLANNED DATE OF NEXT CONSULTATIONS?

2025-05-29

Section 17: Informants

CONTRACTOR'S INFORMANT NAME AND DESIGNATION

\*

Thiruvassagam, Civil engineer

COUNCIL'S INFORMANT NAME AND DESIGNATION

\*

None

NAME AND DESIGNATION OF THE PERSON WHO FILLED THE FORM

Sridhar Rajendran, Project Engineer

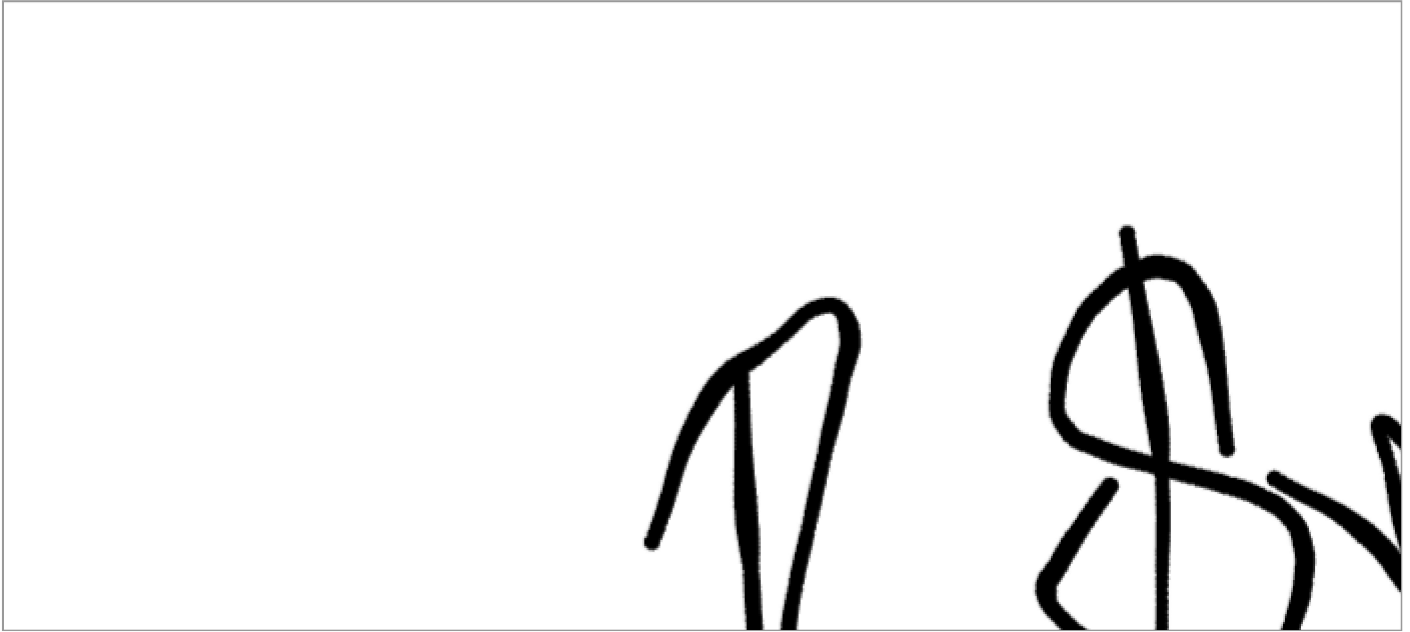
I CERTIFY THAT ALL THE DATA CAPTURES IS ACCURATE TO THE BEST OF MY KNOWLEDGE

\*

- ☒ OK

SIGNATURE

signature-12\_53\_30.png



THIS NOTE CAN BE READ OUT LOUD.....

*Thankyou for completing the form. Please submit when completed*

.....

## **Appendix 5 Dredging and Reclamation Permit Issued by EPA**





203-ECA/399/2025/1: ސަރަޙައްދު

ހުށަހަޅާ ފަރާތް ނުވަތަ ފަރާތްތަކުގެ ނަންމު ފޯމު ފޮޓޯ ހިލާފުކުރުމަށް ދަންނަވާ ނިންމުމެވެ.

މިއަންގަވާއިދު ދަންނަވާ ފަރާތްތަކުގެ ނަންމު ފޯމު ފޮޓޯ ހިލާފުކުރުމަށް ދަންނަވާ ނިންމުމެވެ.

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މިއަންގަވާއިދު 10 ފަންޓުގެ 2025 ވަނަ އަހަރުގެ ނަންމު ފޯމު ފޮޓޯ ހިލާފުކުރުމަށް ދަންނަވާ ނިންމުމެވެ. ފަރާތްތަކުގެ ނަންމު ފޯމު ފޮޓޯ ހިލާފުކުރުމަށް ދަންނަވާ ނިންމުމެވެ.

މިއަންގަވާއިދު 45,000 (ސަތާ ފަންޓު) 4000 (ހަތް ހާސް) 41,000 (ސަތާ ހާސް) ފަންޓުގެ ނަންމު ފޯމު ފޮޓޯ ހިލާފުކުރުމަށް ދަންނަވާ ނިންމުމެވެ. ފަރާތްތަކުގެ ނަންމު ފޯމު ފޮޓޯ ހިލާފުކުރުމަށް ދަންނަވާ ނިންމުމެވެ.

މިއަންގަވާއިދު 12 ފަންޓުގެ 2025 ވަނަ އަހަރުގެ ނަންމު ފޯމު ފޮޓޯ ހިލާފުކުރުމަށް ދަންނަވާ ނިންމުމެވެ. ފަރާތްތަކުގެ ނަންމު ފޯމު ފޮޓޯ ހިލާފުކުރުމަށް ދަންނަވާ ނިންމުމެވެ.

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1446 ސަތާ ފަންޓު

12 ފަންޓުގެ 2025 ވަނަ އަހަރުގެ ނަންމު ފޯމު ފޮޓޯ ހިލާފުކުރުމަށް ދަންނަވާ ނިންމުމެވެ.

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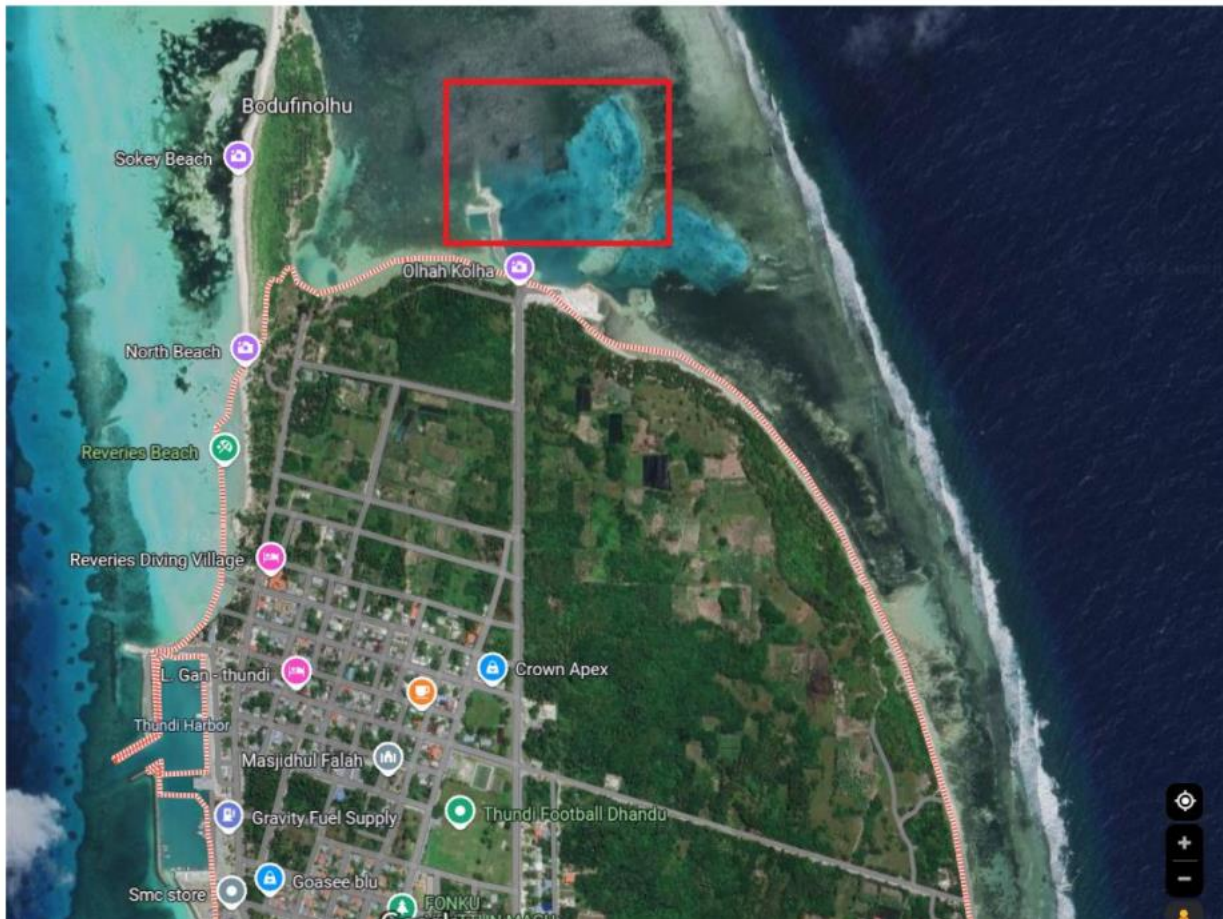


ހުށަހަޅާ ފަރާތް ނުވަތަ ފަރާތްތަކުގެ ނަންމު ފޯމު ފޮޓޯ ހިލާފުކުރުމަށް ދަންނަވާ ނިންމުމެވެ.

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ދަނޑު 1 : ސަރަޙައްދުގެ ތެރޭގައި ހުންނަ ބައްލަވާލަން ދޭ ޖަމިއްޔާއި ޖަމިއްޔާތަކުގެ ދަށުން ބައްލަވާލަން ދޭ ޖަމިއްޔާއި ޖަމިއްޔާތަކުގެ ދަށުން (ބަނޑު)  
ނަންބަރު ޖަމިއްޔާއި ޖަމިއްޔާތަކުގެ ދަށުން



*Handwritten signature*

## Appendix 6 Registered Grievance During Construction Phase

Date	Received by (Name & Designation)	Aggrieved Party (Name & Address / PP or ID card number)	Contact Details of Aggrieved Party (Phone / Email)	Type of Complaint	Details of Complaint	Status	Status Details
21-Aug- 24	Constable Khadeejath Dhiyana	Hussain Afeef	eliteinternational.mv @gmail.com, 7855367	Official	The Contractor's reported that 98 bags of aggregates and 62 bags of coarse sand were stolen from the site. As per the information provided by the Contractor, the incident happened on night of 20 August 2024 and it was reported to the Police Station on 21 August 2024 at 8:45AM.	Resolved	<p>[[21-August 2024] The grievance was reported to the Police Station on 21st August 2024, and the investigation is currently ongoing.</p> <p>As of 22nd August 2024, and according to information provided by the Contractor, the case is being investigated by Senior Sergeant Mohamed Ivan (S/No: 1852). He can be reached at contact number 9924326. The reference number for this case is: 609718.</p> <p>Following the latest site inspection conducted in L. Gan for the IWMRC project on 24th August 2024, and based on information provided by the Contractor, the police in L. Gan will be conducting regular patrols at the IWRMC site to prevent the recurrence of theft incidents.</p> <p>In addition, the Contractor has proposed storing materials in the nearest existing building at the IWRMC site, secured with a padlock, as a control measure to mitigate the risk of</p>

							further theft.
25-Feb-25	Michael Rubia- Environmental & Social Safeguard Officer of Supervision Consultant	Hussain Afeef	<a href="mailto:eliteinternational.mv@gmail.com">eliteinternational.mv@gmail.com</a> , <a href="tel:7855367">7855367</a>	Unofficial	The Contractor raised concern about open burning near the IWRMC construction site, as the resulting smoke and fumes were drifting toward the site and being inhaled by the workers, which poses a health risk.	Resolved	An agreement was reached with the Gan Council to limit burning to coincide with workers' break times. Workers have also been advised to include dust masks in their PPE kits.