

Environmental and Social Due Diligence Report Output 3 (Subproject 3.2 and 3.3)

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Republic of Maldives: Enhancing Climate Resilience and Food Security Project: Output 3.2: Carry out training, advisory, and capacity building for urban home gardeners, farmers, etc and Output 3.3 providing technical advisory support for urban farming and agribusiness.

Subproject 3.2 Establishment of school-based urban garden plots at selected schools.

Subproject 3.3 Provide technical advisory support for urban farming and agribusiness.

Prepared by the Ministry of Tourism and Environment for the Asian Development Bank (ADB)

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Abbreviations

ADB	-	Asian Development Bank
AH	-	Affected Household
AIA	-	Addu International Airport
AP	-	Affected Person
DDR	-	Due Diligence Report
DP	-	Displaced Person
EA	-	Executing Agency
EMP	-	Environmental Management Plan
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
LAR	-	Land Acquisition and Resettlement
MAAW	-	Ministry of Agriculture and Animal Welfare
MCCEE (Formerly) (Formerly)	-	Ministry of Climate Change, Environment and Energy
MOTE	-	Ministry of Tourism and Environment
MHLUD	-	Ministry of Housing, Land and Urban Development
MLA	-	Maldives Land Act
MNDF	-	Maldives National Defense Force
MRC	-	Maldives Red Crescent
PMU	-	Project Management Unit
RF	-	Resettlement Framework
RP	-	Resettlement Plan
SIFCO	-	Sifainge Co-operative
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 Environmental and Social Due Diligence Report (ESDDR) for Phase 1 activities under Output 3.2 of the Enhancing Climate Resilience and Food Security Project (the Project) of the Republic of Maldives. The ESDDR confirms that the proposed subproject components are free of involuntary land acquisition and resettlement impacts such as land acquisition, physical displacement, economic displacement, impacts on livelihoods, community properties, or any other related social safeguard impacts, based on review of site ownership, consultations, and field verification of proposed locations.

Output 3.2 includes the establishment of school-based urban garden plots at selected schools, namely Ghaazee School, Hiriya School, and Muhyiddin School. These school gardens are designed as small-scale, educational interventions within existing school premises to promote practical learning, improve nutrition awareness, and introduce students to climate-resilient urban agriculture practices. The activities are implemented within available institutional land and are intended primarily for demonstration and educational purposes.

Output 3.3 focuses on providing technical advisory support for urban farming and agribusiness. Under this output, demonstration plots; including the National Urban Agriculture Demonstration Plot at Kudakudhinge Bageecha, will be established and supported as model sites to showcase improved cultivation techniques, climate-resilient practices, and sustainable production systems. This output aims to strengthen the capacity of urban home gardeners, farmers, and community groups, while promoting, productivity enhancement, and agribusiness development.

The school gardening activities aim to promote climate-smart agriculture, water-efficient technologies, and nutrition-sensitive urban farming practices among students, teachers, and the wider school community. The demonstration plot is designed as a public learning and showcase platform promoting climate-resilient and space-efficient urban agriculture systems. The interventions include raised beds, hydroponic systems, container-based fruit trees, composting units, drip irrigation systems, rainwater integration, vertical farming systems, and minor associated site improvements. These activities are non-structural or involve only minor improvements within existing developed premises and are fully aligned with the functions of the participating schools and public park site.

SP 3.2 includes small-scale physical works confined within government-owned land. The school lands identified for implementation are owned by the Government and allocated to the Ministry of Education. These interventions are limited to the establishment of school-based urban garden plots within existing premises and do not involve land acquisition or expansion beyond designated school boundaries. No impacts on private land, structures, or livelihoods are anticipated. The intended outcome of SP 3.2 is to increase awareness, strengthen skills, and promote the practical adoption of climate-resilient urban food production practices among students and surrounding communities in selected project areas. Phase 1 activities will be implemented within the Greater Malé Region, specifically in Malé, Hulhumalé, and Vilimalé, with phased expansion to additional islands during subsequent stages of implementation.

Output 3.3 focuses on providing technical advisory for urban farming and agribusiness and includes the establishment of National Urban Agriculture Demonstration Plots as public learning hubs. This output will support the phased establishment of three demonstration plots nationwide, beginning with one site at Kudakudhinge Bageecha in the Greater Malé Region. The Phase 1 demonstration plot site is managed by the Maldives National Defense Force under its Sifainge Co-operative (SIFCO) initiative. The activities under this output are confined to existing managed land, and no impacts on private land, structures, or livelihoods are anticipated. These demonstration plots will serve as model sites to showcase improved

cultivation techniques, climate-resilient practices, and scalable urban agribusiness approaches for wider replication.

Environmental impacts are expected to be minimal, localized, and temporary in nature, limited to minor dust, noise, small quantities of installation waste, and routine gardening activities. These impacts will be managed through good practice measures and a PMU-issued Environmental and Safety Monitoring Checklist. Based on the screening undertaken in accordance with ADB's Safeguard Policy Statement (2009), the subproject is classified as Category C for environment, involuntary resettlement, and Indigenous Peoples.

The Project will establish a simple, accessible, transparent, and effective grievance redress mechanism tailored to the Project's activities. The GRM will address any community concerns arising during implementation and ensure that safeguard commitments are implemented accurately and fairly.

If any unforeseen involuntary resettlement or safeguard issue arises during implementation, the Project will prepare the necessary safeguard instruments in line with the Resettlement Framework and other applicable safeguard frameworks prepared in conformity with ADB requirements and Maldivian laws and policies. The Project will ensure that all safeguard requirements are followed and that no stakeholder is disadvantaged in the implementation process.

The Project Management Unit will monitor implementation of environmental and social safeguard measures and reflect any observations or unexpected impacts in regular project progress reporting and Semi-Annual Social Monitoring Reports, as applicable.

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 climate resilience:

- (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 the Maldives Meteorological Services 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), NGOs, 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 EA. The Ministry of Tourism and Environment (MoTE) (Formerly known as The Ministry of Climate Change, Environment and Energy - (MCCEE)) will be the lead IA, while the MAAW will also be an IA for OP3. Several other Government agencies will be involved in project implementation. For Output 1 the main partner will be the Maldives Meteorological Service, under the Ministry of Tourism and Environment (MoTE), For Output 2, the Kulhudhuffushi City Council will be engaged, while for Output 3, MAAW will be the lead. The SME Development

Finance Corporation will be involved in OP4.

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), Kaafu Atoll (Male', Hulhumale' and Vilimale'). Output 4 will be implemented nation-wide.

6. The start date of the investment project is December 2024 and the project will be implemented until June 2030, with the estimated closing date of the loan and grant set at 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.

8. This environmental and social due diligence report covers the implementation arrangements of Output 3.2 and Output 3.3.

B. Purpose of Environmental and Social Due Diligence Report

9. All projects funded by ADB and ADB administered projects must comply with its Safeguard Policy to ensure that projects are environmentally sound, designed to operate in compliance with applicable regulatory requirements, and are not likely to cause significant environmental impact. In this regard, a desk study was carried out and this due diligence report was prepared following the provisions in the Safeguards Requirements-1 (SR-1) of the Safeguard Policy Statement 2009 (SPS) of ADB.

10. The main objective of the due diligence is to assess any potential impacts from implementation of a proposed project and ascertain if they will indeed incur minimal or no risks that will not require the preparation of environmental assessments and EMP as per the SPS. The project was screened for environmental impacts due to implementation of the work by using ADB's rapid environmental assessment (REA) checklist, study of project details, and consultation with some of the concerned stakeholders.

11. In addition to environmental screening, the project was assessed for potential social safeguard implications in accordance with Safeguard Requirements 2 (Involuntary Resettlement) and Safeguard Requirements 3 (Indigenous Peoples) of ADB's Safeguard Policy Statement (2009). The due diligence examined whether the proposed activities would involve land acquisition, involuntary resettlement, restriction of access to resources, impacts on livelihoods, or effects on vulnerable groups. The assessment was based on a review of project design, site characteristics, institutional arrangements, and consultations with relevant stakeholders. The objective of the social due diligence is to confirm that the proposed activities will not trigger adverse social safeguard impacts and that appropriate procedures are in place to address any unforeseen issues during implementation.

C. Output 3 Subproject Components

12. SP 3.1 will focus on capital works and equipment for HAC. The capital works will upgrade and expand the existing HAC facility, while additional equipment and vehicles will be purchased to improve HAC's capacity to undertake adaptive research of soils, plants, pests, diseases, and water, and to package the results as trainings and recommendations for farmers.

13. SP 3.2 will focus on establishing a knowledge platform with the objective of working with stakeholders to identify site specific problems, generating solutions to problems using an adaptive research approach, and disseminating knowledge. It will aim to promote water-

efficient and resilient city farming and urban agriculture and sustainable agribusiness through enhanced advisory and training programs for farmers, cooperatives, island women and youth, women development committees, non-government organizations (NGOs), and communities, which includes carrying out training, advisory, and capacity building for school gardens.

14. SP 3.3 will focus on providing technical advisory support for urban farming and agribusiness. This includes establishing an Advisory Clinic, delivering direct training to farmers, implementing an internship program at HAC, developing agricultural training content and courses, and strengthening extension services. The subproject will also establish demonstration plots at Kudakudhinge Bageecha, Kulhudhuffushi, and HAC, including completion of required environmental and social screening, design finalization, procurement, and implementation of minor works to support applied learning and practical demonstration of climate smart farming practices.³

D. Scope of this Due Diligence Report

15. The scope of this DDR covers the implementation of SP 3.2, comprising the School Gardening Program under Phase 1, and SP 3.3, which includes the National Urban Agriculture Demonstration Plots. The objective of this due diligence exercise is to confirm that the identified school and demonstration plot sites are free from involuntary resettlement impacts, including land acquisition, physical or economic displacement, impacts on livelihoods, community assets, or any other social safeguard risks. The DDR also assesses whether the proposed activities under SP 3.2 and SP 3.3 are likely to result in significant environmental impacts that would require further environmental assessment in accordance with the ADB Safeguard Policy Statement, 2009.

16. Due diligence activities have been carried out to screen the likely involuntary resettlement, Indigenous Peoples, and environmental impacts for interventions under Output 3, as well as in reference to the overall Project framework. The findings from the screening suggest that implementation of SP 3.2 Phase 1 activities will not involve any involuntary resettlement impacts, will not trigger ADB's SPS (2009) Safeguard Requirements on involuntary resettlement or Indigenous Peoples, and is not expected to cause significant environmental impacts. Accordingly, the subproject is classified as Category C for environment, involuntary resettlement, and Indigenous Peoples.

II. REGULATORY REQUIREMENTS

A. Environmental Safeguards Requirements

ADB Safeguard Policy Statement (2009)

17. **The Policy:** All projects funded by ADB must comply with its safeguard policy guided by SPS 2009 to ensure that projects undertaken under ADB's financial support are environmentally sound, are designed to operate in compliance with applicable regulatory requirements, and are not likely to cause significant environmental, health, or safety hazards.

1. **Categorization of the Project:** ADB undertakes project screening and categorization at the earliest stage of project preparation when sufficient information is available for this purpose. ADB uses a classification system to reflect the significance of a project's potential environmental impacts. Each proposed project is scrutinized as to its type, location, scale, and sensitivity, and the magnitude of its potential environmental impacts. For this, ADB categorizes the proposed components into categories (A, B, C, or FI) to determine the level of environmental assessment required to address the potential impacts. Projects are assigned to one of the following four categories.

- (i) **Category A.** A proposed project is classified as category A if it is likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented. These impacts may affect an area larger than the sites or facilities subject to physical works. An environmental impact assessment is required for Category A projects.
- (ii) **Category B.** A proposed project is classified as category B if its potential adverse environmental impacts are less adverse than those of category A projects. These impacts are site-specific, few if any of them are irreversible, and in most cases, mitigation measures can be designed more readily than for category A projects. An initial environmental examination is required.
- (iii) **Category C.** A proposed project is classified as category C if it is likely to have minimal or no adverse environmental impacts. No environmental assessment is required, although environmental implications need to be reviewed.
- (iv) **Category FI.** A proposed project is classified as category FI if it involves investment of ADB funds to or through a financial intermediary (FI).

Categorization of the Project: The scope of this Due Diligence Report is limited to SP 3.2, School Gardening Program under Phase 1, and SP 3.3, National Urban Agriculture Demonstration Plots. These activities include establishment of small scale gardens within existing school premises and designated public sites, minor site preparation, installation of garden beds and simple irrigation systems, and provision of technical advisory and training support. The activities do not involve large scale infrastructure development or significant physical construction works. Hence, following the ADB Safeguard Policy Statement, 2009, the activities are classified as Category C for environment, as no significant adverse environmental impacts are anticipated from their implementation. This Due Diligence Report has therefore been prepared to document environmental compliance consistent with SPS requirements.

National Environmental Legislation

18. Projects implemented in the Maldives are required to comply with the Environmental Protection and Preservation Act, Law No. 4/93, and the Environmental Impact Assessment Regulation, 2012/R-27. The Ministry of Tourism and Environment, MOTE, is responsible for

environmental policy and serves as the lead implementing agency for projects in the environment sector, while the Environmental Protection Agency, EPA, functions as the regulatory authority responsible for administering the EIA process and issuing environmental decisions

19. Under the EIA Regulation, projects listed in Schedule D require a mandatory EIA, while those listed in Schedule T do not require assessment. Projects not falling under either schedule are subject to screening by the EPA to determine whether an Initial Environmental Examination, IEE, Environmental Management Plan, EMP, full EIA, or specific mitigation measures are required. For the proposed activities, screening will be undertaken with the EPA where required to confirm the applicable environmental assessment and approval requirements prior to implementation.

B. Social Safeguards Requirements

Social Safeguards Legal and Policy Framework and Entitlements

20. 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.¹
- (vi) Compensation for loss of land, structures, trees, other assets and 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

¹ 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.

- 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.

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

Constitutional Guarantees

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.

22. 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.

23. 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.

1. Local Councils

24. 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).

2. Maldivian Land Act

25. 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.

26. 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.
27. 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.
28. 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).
29. 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.
30. 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.
31. 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.
32. 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.

3. ADB's Safeguard Policy Statement (2009)

33. 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.
34. 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.
35. 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)², 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.

36. 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.

37. 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

² 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.

compensation or any other assistance.

38. 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).

III. DESCRIPTION OF THE PROJECT

A. Project Impact and Outcome

39. The proposed activities under Output 3.2 and Output 3.3 align with the Government of Maldives' priorities on food security, climate resilience, youth engagement, and sustainable urban development. The initiatives contribute to strengthening adaptive capacity in densely populated island environments through promotion of climate-smart and water-efficient urban agriculture systems.

40. The intended outcome of Output 3.2 (School Gardening Program) is to increase awareness, strengthen practical skills, and promote the adoption of climate-resilient urban food production practices among students and surrounding school communities in selected project areas. Phase 1 activities under this output will be implemented within the Greater Malé Region - specifically in Malé, Hulhumalé, and Vilimalé - with phased expansion to additional islands during subsequent stages of implementation.

41. The intended outcome of Output 3.3 (National Urban Agriculture Demonstration Plots and Technical Advisory for Urban Farming and Agribusiness) is to enhance technical capacity, improve productivity, and support the replication of climate-resilient urban agriculture and agribusiness practices among home gardeners, farmers, and community groups. Under Phase 1, the initial demonstration plot will be established in the Greater Malé Region, with additional sites to be developed nationwide through a phased implementation approach.

B. Project Output

42. The proposed initiative under Output 3 will deliver the following outputs:

- **Output 3.2:** School-based urban agriculture platforms established and operational. This output will support the phased establishment of climate-smart school gardens in six schools nationwide, beginning with three schools in the Greater Malé region. Activities include:
 - Development of ground-level, rooftop, or balcony-based garden systems adapted to site conditions
 - Installation of raised beds, hydroponic systems, protected cultivation structures, and drip irrigation supported by rainwater harvesting where available
 - Introduction of composting systems for organic waste management
 - Integration of supervised student participation in planting, maintenance, harvesting, and learning activities
 - The school gardens are designed to function as experiential learning platforms that strengthen nutrition awareness, environmental stewardship, and practical skills development among students.
- **Output 3.3:** National Urban Agriculture Demonstration Plots established as public learning hubs. This output will support the phased establishment of three demonstration plots nationwide, beginning with one site at Kudakudhinge Bageecha in the Greater Malé region. Activities include:
 - Establishment of raised bed production systems and vertical farming units, including hydroponic and soil-based systems
 - Installation of compact composting systems to demonstrate circular waste management practices
 - Development of an edible flower cultivation area to support small-scale value

addition

- Promotion of value-added products such as fresh salads, juices, and fruit- and flower-based ice creams through the existing kiosk, subject to seasonal availability
- Installation of educational signboards and QR-based information systems to support public awareness and outreach

43. Phase 1 implementation includes three schools and one demonstration plot within the Greater Malé region. An additional three schools and two demonstration plots are planned under Phase 2, subject to site identification and separate activity screening as required.

IV. METHODOLOGY

44. The due diligence report adopted the following methodology.

- **Desk Study:** Relevant documents related to the project were collected and reviewed and relevant information used for preparing this DDR.
- **Consultation:** Interactions were held with representatives of three school managements, and national and subnational government agencies.
- **Project Screening:**
 - A rapid environmental assessment of the environmental impacts from the implementation of the project was prepared using the ADB's Rapid Environmental Assessment (REA) Checklist.
 - Social assessment was prepared using ADB's Land Acquisition and Resettlement (LAR) Screening Checklist and by assessing for Indigenous People's Impacts.

V. BASELINE DATA ON ENVIRONMENT OF THE PROJECT AREA

45. This subproject will be implemented in two phases. In total, school gardens are planned for six schools across the Maldives, and three National Urban Agriculture Demonstration Plots will be established on selected islands. At the time of preparation of this Due Diligence Report, three schools and one demonstration plot have been confirmed under Phase 1.

46. The Phase 1 project sites are located within the Greater Malé region, comprising Malé, Hulhumalé, and Vilimalé. These islands are geographically proximate and form a continuous urban cluster with similar environmental and socio-economic characteristics. The description below provides a consolidated overview of existing baseline conditions.

A. Physical Environment

47. The Greater Malé region is situated within the North Malé Atoll and is characterized by low-lying coral islands with an average elevation of approximately 1 to 2 meters above mean sea level. Hulhumalé is a reclaimed island developed through engineered land reclamation, while Malé and Vilimalé are naturally formed coral islands that have undergone extensive urban modification.

48. The climate is tropical monsoonal, with warm temperatures throughout the year, high humidity, and seasonal rainfall associated with the southwest and northeast monsoons. Annual rainfall averages approximately 1,900 to 2,000 mm.

49. Groundwater occurs as shallow freshwater lenses overlying saline groundwater. In Malé and Hulhumalé, groundwater quality is generally degraded due to high population density, historical contamination, and saline intrusion. Potable water is primarily supplied through desalination systems. Surface water bodies are absent, and stormwater drainage is managed through engineered systems.

50. Land use across all three islands is predominantly urban, consisting of residential, institutional, commercial, and public infrastructure. Vegetation is largely ornamental or landscaped, with limited natural soil profiles remaining due to urban development and reclamation.

B. Biological Environment

51. The project areas are highly urbanized and do not contain natural terrestrial ecosystems of ecological significance. Vegetation primarily consists of planted ornamental species, coconut palms, shade trees, shrubs, and managed landscaping within school compounds and public spaces.

52. No protected areas, wetlands, mangroves, or sensitive terrestrial habitats are present within the project sites. Fauna is limited to common urban species such as birds, small reptiles, and insects adapted to built environments.

53. The proposed sites for school gardens and the demonstration plot are located within already developed premises and do not involve clearing of natural vegetation or disturbance of ecologically sensitive habitats.

C. Socioeconomic, Cultural and Religious Environment

54. The Phase 1 activities are located within the Greater Malé region, comprising Malé, Hulhumalé, and Vilimalé. This urban cluster represents the administrative, economic, and educational center of the Maldives and is characterized by high population density, mixed

residential and institutional land use, and strong public service presence. Malé City functions as the national capital and primary economic hub. Hulhumalé serves as a planned urban extension accommodating population growth, while Vilimalé is predominantly residential with community and educational facilities. Across all three islands, households rely primarily on wage employment and service-based economic activities.

55. Food supply in the Greater Malé region is predominantly dependent on imports and inter-island transport from agricultural islands. Due to limited land availability and urban density, household-level agriculture is minimal and generally restricted to small container gardening or rooftop planting. Fresh produce markets, supermarkets, and wholesale suppliers form the primary sources of food access.
56. The Maldives is constitutionally a Muslim country, and Islam plays a central role in shaping social norms, community practices, and institutional life. Mosques are present on all inhabited islands, and religious observances influence daily routines, public holidays, and community events. Cultural practices emphasize family structures, community cohesion, and shared public spaces.
57. Education levels in the Maldives are comparatively high, with national literacy rates exceeding 97 percent. The Greater Malé region hosts a concentration of government and private schools, higher education institutions, and vocational training centers. School enrollment rates are high, and educational institutions play a central role in community engagement and youth development.
58. Infrastructure and public services in the Greater Malé region are comparatively advanced relative to outer atolls. The region has established electricity supply, desalinated water systems, sewerage networks, waste collection services, paved roads, and telecommunications infrastructure. Access to health services, financial institutions, and public administration offices is centralized within this urban cluster.

VI. ENVIRONMENTAL IMPLICATIONS AND MANAGEMENT

A. Environmental Implications and Management

59. The proposed activities under Output 3.2 involve small-scale installation of school gardens and under Output 3.3 involve urban agriculture demonstration plots within existing developed premises. The works include construction of raised planting beds, installation of small-scale irrigation systems, hydroponic units, protected growing structures, compost bins, and minor site preparation works. All sites are located within operational school compounds and a public park setting in the Greater Malé region.
60. Environmental impacts associated with the activities are expected to be minimal, site-specific, and temporary in nature. Potential impacts may include:
- Minor dust and localized noise during installation works
 - Temporary traffic disturbance during transport of materials
 - Small quantities of construction-related packaging waste
 - Potential mosquito breeding if containers or water storage are improperly managed
 - Odor generation and attraction of vectors such as flies or rodents if composting and organic waste are not properly managed
 - Minor occupational health and safety risks during installation activities
61. Given that works will take place in active school and public settings, particular attention will be given to the student and community safety. Contractors will be required to:
- Coordinate work schedules with school administrations to avoid teaching hours and peak student movement times
 - Clearly barricade and cordon off active work areas using temporary fencing or safety tape
 - Install visible safety signage around work zones
 - Ensure that all workers wear identifying name tags and appropriate work attire at all times
 - Prohibit unauthorized access to work area, tools, materials, and equipment
 - Maintain clean and orderly work areas at the end of each day
 - Ensure contractor's staff and workers respects local culture and do not indulge in any unsocial activities which shall be controlled and guided by preparing workers code of conduct
62. General impacts can be effectively managed through standard good construction practices. Contractors and site supervisors will ensure:
- Coordination of material delivery and installation works with school administrations to avoid disruption during teaching hours
 - Suppression of dust through watering and cover the construction material stockpiles
 - Proper housekeeping and daily clean-up of work areas
 - Removal and appropriate disposal of packaging and waste materials through existing municipal waste systems
 - Prevention of stagnant water accumulation in open containers or pits
 - Use of basic personal protective equipment and adherence to safe work practices
 - Toolbox briefings for workers prior to commencement of daily activities
 - Workers will not be accommodated within school premises. Access to school grounds will be strictly limited to designated working areas and working hours. No labor camps will be established as part of this subproject.
 - During operation, environmental risks are limited to routine gardening activities. The use of chemical inputs will be avoided; only biopesticides and limited organic fertilizers

will be used. Composting will be managed in contained bins to prevent odor, pests, and runoff. Water for irrigation will rely primarily on existing rainwater storage and efficient drip irrigation systems.

63. No significant adverse environmental impacts are anticipated from the implementation of these activities. Based on the scale and nature of works, the proposed interventions are considered low impact and consistent with Environment Category C classification under the ADB's Safeguard Policy Statement 2009.

B. Environmental Monitoring

64. To ensure consistent implementation of environmental and safety measures, the PMU will prepare and issue a concise Environmental and Safety Monitoring Checklist tailored to small-scale works within school and public premises. Contractors will be required to comply with the checklist during installation activities. The checklist will cover site barricading and signage, worker identification, housekeeping, waste management, prevention of stagnant water accumulation, safe storage of tools and materials, and basic occupational health and safety requirements.
65. Contractors will be required to submit brief compliance reports to the PMU during the installation phase, confirming adherence to the monitoring checklist and documenting any incidents, corrective actions, or site-specific issues encountered.
66. The work implementation shall comply with the project IEE and EMP; and shall be guided by the PMU-issued Environmental and Safety Monitoring Checklist. Compliance will be verified by PMU through routine supervision visits and review of contractor-submitted compliance reports. One of the site staff of the contractor will be oriented on key areas of compliance related to safeguards and safety requirements and to routinely fill the monitoring checklist and share with PMU environmental safeguard specialist.

VII. SOCIAL SAFEGUARDS DUE DILIGENCE

A. Scope of Land Acquisition and Resettlement – Output 3 Subproject 3.2

68. Physical activities under Output 3.2 of the Project include the establishment of school-based urban garden plots at selected schools, namely Ghaazee School, Hiriya School, and Muhyiddin School. These interventions fall under Output 3: Climate-Smart Urban Farming and Capacity Building and are designed as small-scale, educational activities implemented within existing school premises.

B. Scope of Land Acquisition and Resettlement – Output 3 Subproject 3.3

69. Under Output 3.3, physical activities include the establishment of the National Urban Agriculture Demonstration Plot at Kudakudhinge Bageecha. This demonstration plot is designed as a public learning and model site to showcase climate-resilient cultivation practices and urban agribusiness approaches. The intervention will be implemented within an existing managed public site and does not involve expansion beyond designated boundaries.

70. These subprojects fall under Output 3: Climate-Smart Urban Farming and Capacity Building and are designed as small-scale, educational and demonstrative interventions within existing school premises and an existing public park.



Figure 1 Images of the Ghaazee School's existing school garden



Figure 2: Image of Hiriya School's Terrace



Figure 3: Muhyiddin School's Balcony Garden Area

71. The school gardening activities aim to promote climate-smart agriculture, water-efficient technologies, and nutrition-sensitive urban farming practices among students, teachers, and the wider school community. The interventions include raised beds, hydroponic systems, container-based fruit orchards, composting units, drip irrigation systems, and rainwater harvesting integration. These activities are non-structural or involve only minor improvements within existing infrastructure and are fully aligned with the educational mandate of the participating schools

72. All school garden plots are located entirely within the legally designated boundaries of existing school premises. In the case of Hiriya School, the intervention is implemented on an existing rooftop structure, while Ghaazee School activities are confined to available ground space within the school compound and Muhyiddin School's activities are confirmed to be confined with a balcony area of the school. No expansion beyond school land is required.

73. The establishment of the school gardens does not involve land acquisition, changes in land ownership, land use reclassification, displacement of persons, loss of livelihoods, or restriction of access to land or assets. Normal school access and operations will be maintained throughout implementation. No third-party users occupy the project sites, and no informal or formal land disputes are associated with the proposed garden areas. Accordingly, the school gardening subprojects under Output 3 are confirmed as Category C for Involuntary Resettlement under ADB SPS (2009), and no resettlement planning.

74. The SIFCO National Urban Agriculture Demonstration Plot aims to promote climate-smart agriculture, water-efficient technologies, circular waste management, and nutrition-sensitive urban farming practices within a public education setting. The interventions include raised-bed gardens, hydroponic and soil-based vertical systems, integrated composting units utilizing aviary and green waste, edible flower cultivation, and small-scale value addition linked to the existing kiosk facility. These activities are non-structural in nature or involve only minor improvements within already developed park premises and are fully aligned with the operational mandate of the Children's Park and SIFCO's management functions.

75. The demonstration plot is located entirely within the legally designated boundaries of Kudakudhinge Bageecha (Children's Park), a public recreational facility managed by SIFCO under the Ministry of Defense. All proposed activities are confined within existing park space, and no expansion beyond the park's established boundaries is required, do not require land acquisition, physical displacement, or changes to current ownership or access arrangements.

76. The establishment of the demonstration plot does not involve land acquisition, changes in land ownership, land use reclassification, displacement of persons, loss of livelihoods, or restriction of access to land or assets. Public access to the park will be maintained throughout implementation, with minor works scheduled to avoid disruption to normal operations. No third-party users occupy the designated plot area, and no informal or formal land disputes are associated with the site. Accordingly, the SIFCO Demonstration Plot under Output 3 is confirmed as Category C for Involuntary Resettlement under ADB SPS (2009), and no resettlement planning is required.

C. Outcome of the Land Acquisition and Resettlement Screening for Output 3 – School Gardening Program

77. Findings from site visits and consultations conducted for the School Gardening Program under Output 3 conducted on 22 December 2025, 31 December 2025 and 07 January 2026, on confirm that the activities will not result in any permanent or temporary negative impacts on private land, structures, or livelihoods. All garden plots are located entirely within existing school premises, including ground-level areas and, in the case of Hiriya School, an existing rooftop space. No third-party land users, tenants, or informal occupants are present within the designated garden areas

78. School access and daily operations will remain uninterrupted. Any minor temporary

disturbance during installation of raised beds, hydroponic systems, or greenhouse upgrades will be managed through good site management practices, supervision, and scheduling works outside peak school hours where necessary.

79. The garden areas form part of the officially designated school compounds under the Ministry of Education. No change in land ownership, land use classification, or access rights is required for implementation. The activities are confined to existing institutional land already allocated for educational purposes.

80. A due diligence exercise was conducted to screen for any potential involuntary resettlement impacts under Output 3. The screening confirms that the subprojects are Category C for Involuntary Resettlement under ADB SPS (2009), with no requirement for land acquisition, resettlement planning instruments, or livelihood restoration measures.

Table 1 Outcome of the LAR Screening conducted for Output 3 – School Gardening Programs

Issues	Remarks
Will the Project include any physical construction work?	Yes, construction of some footpaths and small scale construction such as composting pits.
Will it require permanent and/or temporary land acquisition?	No land acquisition is required. The government owns the land.
Will there be loss of structure?	No.
Are there any non-titled people who live or earn their livelihood at the site?	No.
Will there be loss of housing?	No
Will there be loss of agricultural plots?	No. The government owns the land of all schools.
Will there be losses of crops, trees, and fixed assets (i.e. fences, pumps, etc.)?	No.
Will there be loss of business or enterprise?	No.
Will there be loss of incomes and livelihoods?	No.
Will people lose access to facilities, services, or natural resources?	No.
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 of ethnic minority groups?	No indigenous of ethnic minority groups living in the SP area.

81. The findings from the safeguard due diligence exercise confirms that physical implementation of the SP 3.2 under Output 3 of the Project:

- (i) Will not involve any major temporary or permanent private land acquisition and involuntary resettlement impacts. Minor negative impacts during the construction phase may be experienced by students or staff, to be mitigated through the EMP such as setting specific timings for any construction related component.
- (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 adverse impact on surrounding lands and other properties.
- (iv) No impact on any vulnerable or any indigenous of ethnic minority groups.
- (v) Total area required for the SP intervention is currently also used for school gardening purposes and land is owned by the Government of Maldives.

D. Outcome of the Land Acquisition and Resettlement Screening for Output 3 – Kudakudhinge Bageecha Demonstration Plot

82. Findings from site visits and consultations conducted for the Kudakudhinge Bageecha

Demonstration Plot under Output 3 on 21 November 2025 confirm that the proposed activities will not result in any permanent or temporary negative impacts on private land, structures, or livelihoods. The demonstration plot is located entirely within the existing boundaries of Kudakudhinge Bageecha (Children's Park), a public facility managed by SIFCO under the Ministry of Defense. No third-party land users, tenants, or informal occupants are present within the designated intervention area.

83. Public access to the park and its daily operations will remain uninterrupted. Any minor temporary disturbance during installation of raised beds, vertical farming systems, composting units, irrigation components, or kiosk-related improvements will be managed through proper site supervision, safety controls, and scheduling of works to avoid disruption to visitors.

84. The designated plot area forms part of the officially established public park premises. No change in land ownership, land use classification, or access rights is required for implementation. The activities are confined to existing public institutional land already allocated for recreational and community use.

85. A due diligence exercise was conducted to screen for any potential involuntary resettlement impacts under Output 3. The screening confirms that the Kudakudhinge Bageecha Demonstration Plot is Category C for Involuntary Resettlement under ADB SPS (2009), with no requirement for land acquisition, resettlement planning instruments, or livelihood restoration measures.

Table 2 Outcome of the LAR Screening conducted for Output 3 - Kudakudhinge Bageecha Demonstration Plot

Issues	Remarks
Will the Project include any physical construction work?	Yes, construction of some footpaths and small scale construction such as composting pits.
Will it require permanent and/or temporary land acquisition?	No land acquisition is required. The government owns the land.
Will there be loss of structure?	No.
Are there any non-titled people who live or earn their livelihood at the site?	No.
Will there be loss of housing?	No.
Will there be loss of agricultural plots?	No.
Will there be losses of crops, trees, and fixed assets (i.e. fences, pumps, etc.)?	No.
Will there be loss of business or enterprise?	No.
Will there be loss of incomes and livelihoods?	No.
Will people lose access to facilities, services, or natural resources?	No.
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.

E. Indigenous People

86. None of the population at any of the school 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.

87. The implementation of SPs under the Output 3 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 any of schools as defined in ADB's SPS (2009), and hence, the project is deemed to be classified as category C for indigenous people's impacts.

VIII. IMPLEMENTATION ARRANGEMENTS

A. Implementation Arrangement

88. The Ministry of Finance (MoF) is the overall project's executing agency. For Output 3, implementation is shared by the Ministry of Tourism and Environment and the Ministry of Agriculture and Animal Welfare. PMU is responsible to take national/subnational government clearance of permits, project management, implementation and monitoring of project activities. Review and ensure compliance with the environmental safeguards requirements in the Environmental Safeguards Due Diligence Report including the: (i) preparation and implementation of the environmental monitoring checklist, (ii) development of modules and conduct of environmental safeguards orientation to contractors and school management and demonstration plot leaders about the environmental safeguards requirements, environmental screening checklist, environmental management measures such as good housekeeping, waste management; and (iii) periodic monitoring of environmental safeguards performance of all project activities. The Executing Agency will facilitate if interagency coordination is required on safeguards. The chart below shows the organizational structure of the project.

B. Capacity Assessment

89. The PMU under the Ministry of Tourism and Environment have staff assigned for safeguards including an environmental safeguards specialist, a social safeguards specialist and a gender specialist. As the projects proposed in this DDR are small scale and within the Greater Male' Area where the PMU is established, PMU safeguards staff will be ensuring compliance to safeguards requirement.



Figure 4 Implementation arrangement

C. Roles and Responsibilities

90. The roles and responsibilities of various stakeholders in the project is presented in the following table.

Table 3 Project Roles and Responsibilities

Project Implementation Organization	Management Roles and Responsibilities
Executing Agency: Ministry of Finance (MOF)	<ul style="list-style-type: none"> - Guide and monitor overall project execution, responsible for timely execution of the project - Provide financial oversight; ensure flow of funds to the implementing agency and timely availability of counterpart funding; ensure adequate budget for successful implementation of the project and operation and maintenance of the facilities - Monitor compliance with project legal agreements - Open advance accounts for the project - Responsible for approving procurement for contracts above MVR 2.5 million; reviews and coordinates evaluation of bids for works, goods, and consultant services - Reviews and signs withdrawal applications before submitting to Asian Development Bank (ADB)
Project Steering Committee: Chair: Minister of MOTE Members:	<ul style="list-style-type: none"> - Provide policy direction to facilitate project implementation - Advise on and facilitate resolution of technical issues, as required - Meet quarterly (or as needed) to review project performance and resolve issues - Ensure collaboration among central level agencies
Implementing Agency 1: Ministry of Tourism and Environment (MOTE)	<ul style="list-style-type: none"> - Overall day-to-day project management, monitoring, and evaluation - Establish PMU - Procure goods and works below MVR 5 million - Ensure timely decisions for efficient procurement and contract management - Sign all procurement contracts under the project - Prepare withdrawal applications - Maintain project accounts and complete loan financial records - Prepare financial statements and ensure timely conduct of audit - Sign MOU with island councils targeted under the different outputs - Provide technical and institutional capacity building support - Report to ADB and issue quarterly and annual progress reports on project implementation - Ensure system for sustainable operation and maintenance (O&M) of project facilities - Coordinate with ADB and other development partners to synchronize, plan and mobilize resources for climate resilience and food security
Implementing Agency 2: Ministry of Agriculture and Animal Welfare (MAAW)	<ul style="list-style-type: none"> - Support day-to-day project management, monitoring, and evaluation pertaining to Output 3 and partially for Output 4 (agriculture-related grants) - Support PMU in procurement of goods and works under Output 3 - Provide technical and institutional capacity building support linked to Output 3 - Support PMU project progress reports and all other reporting - Ensure system for sustainable operation and maintenance (O&M) of project facilities supported under Output 3
Project Management Unit Based in MOTE's Climate Change Department	<ul style="list-style-type: none"> - Responsible for overall project management, implementation and monitoring

<p>(CCD). Headed by Project Director nominated by MOTE and supported by a dedicated Project Manager.</p>	<ul style="list-style-type: none"> - Monitor and ensure the compliance of covenants, particularly timely submission of audited project accounts and compliance with safeguard requirements - Maintain project accounts and project financial records - Review the reports submitted by project implementation consultants with respect to detailed design, costs, safeguards, financial, economic, and social viability - Prepare, with the support of individual technical experts, bidding documents, request for proposals, and bid/proposal evaluation reports - Serve as point of contact of ADB, maintain project documents, and submit timely reports (quarterly progress reports and project completion report) to ADB by consolidating relevant inputs from the other project implementation agencies - Consolidate expenditures and prepare withdrawal applications for direct payment, reimbursement and use of advance accounts - Open and manage advance accounts - Organize project orientation for participating island councils by elaborating scope of the project - Establish and maintain project website by disclosing progress reports, safeguard monitoring reports and design reports - Collect supporting documents and submit withdrawal applications to ADB via MOF
<p>Muhyiddin School Ghaazee School Hiriya School</p>	<ul style="list-style-type: none"> - Provide site access and institutional coordination for establishment of school gardens - Nominate a school focal point to coordinate implementation and supervision - Ensure integration of garden activities into supervised student learning programs - Support day-to-day operation and maintenance of the garden facilities - Ensure safe access, proper use, and long-term upkeep of installed systems
<p>Maldives National Defense Force</p>	<ul style="list-style-type: none"> - Provide site access, local coordination, and oversight for establishment of the National Urban Agriculture Demonstration Plot - Implement installation works under the SIFCO CSR initiative using materials supplied by the project - Ensure safe execution of installation works within the public park environment - Be responsible for long-term operation and maintenance of the demonstration plot infrastructure - Support public outreach and knowledge dissemination activities linked to the demonstration site
<p>Ministry of Education</p>	<ul style="list-style-type: none"> - Provide consultation and endorsement for selection of participating schools - Facilitate coordination between the PMU and school administrations - Support integration of school garden activities within broader educational and sustainability initiatives - Provide guidance on expansion to additional schools under Phase 2
<p>ADB</p>	<ul style="list-style-type: none"> - Conduct project review missions, midterm review mission and project completion review mission to assess implementation progress of all outputs, compliance with loan and grant covenants including actions required in terms of safeguards (environmental impacts and social mitigation measures applicable); timeliness of budgetary allocations and counterpart funding; project expenditures; progress with procurement and disbursement; and

	<p>the likelihood of attaining the project's immediate development objective</p> <ul style="list-style-type: none">- Post on ADB website updated project information, audit reports, and safeguards documents as per ADB's disclosure policy- Review submissions for procurement of goods, equipment, works and services, and provide comments and no objection on the submissions
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IX. CONSULTATION AND GRIEVANCE REDRESS MECHANISM

A. General Principle

91. Upon commencement of activities under Output 3, including the School Gardening Program and the establishment of National Urban Agriculture Demonstration Plots, the PMU will operationalize a project-specific, simple, acceptable, transparent, and effective Grievance Redress Mechanism (GRM). The GRM will stipulate the required levels and responsible focal points at contractor, school, park/SIFCO, landowner, ministry, and PMU levels, depending on the subcomponent. The mechanism will provide a time-bound and transparent process to manage and resolve any social or environmental concerns that may arise during planning, implementation, and operation. This includes issues related to the use of school premises and park premises, student safety, visitor safety, environmental management practices, occupational health and safety, inclusion and participation, accessibility, and other related matters.

92. For the **School Gardening Program**, Tier 1 grievances will be addressed by the contractor responsible for installation works. Tier 2 will comprise the respective School Administration together with the Ministry of Education. Tier 3 will be the PMU.

93. For **National Urban Agriculture Demonstration Plots** established on institutional or public land, Tier 1 grievances will be addressed by the contractor. Tier 2 will comprise the respective land-owning institution together with the Ministry of Agriculture and Animal Welfare (MoAAW). Tier 3 will be the PMU.

94. For the Kudakudhinge Bageecha Demonstration Plot constructed under National Urban Agriculture Demonstration Plots, Tier 1 grievances will be addressed by SIFCO in its capacity as site manager. Tier 2 will be the Ministry of Agriculture and Animal Welfare. Tier 3 will be the PMU.

95. It is the responsibility of the PMU, in coordination with the Ministry of Education, participating schools, SIFCO, land-owning institutions, and the Ministry of Agriculture and Animal Welfare, to provide information on the GRM to students, parents, teachers, school staff, contractors, park visitors, SIFCO staff, and surrounding communities in all locations where Output 3 activities are implemented. This information will be disseminated within three months of commencement of activities. Multiple means will be utilized, including school assemblies, parent-teacher meetings, park notice boards, public notices, information leaflets, community outreach sessions, and social media platforms where appropriate.

96. The GRM will ensure that concerns and complaints are promptly addressed through an understandable and transparent process that is gender-responsive, culturally appropriate, and readily accessible to all stakeholders at no cost and without retribution. The mechanism will be accessible to students, teachers, school staff, parents, community members, park visitors, contractors, and institutional staff. The GRM does not impede access to Maldivian judicial or administrative remedies.

97. Schools and the Ministry of Education, and in the case of demonstration plots the respective landowner/SIFCO and the Ministry of Agriculture and Animal Welfare, in coordination with the PMU, will inform stakeholders about the GRM upon initiation of Output 3 activities. Through orientations, site briefings, and dissemination of information materials, stakeholders will be informed of their right to file complaints. For issues pertaining to sexual exploitation and abuse and sexual harassment (SEA/SH), grievance materials and notice boards will provide direction on the appropriate contact numbers of the Ministry of Gender,

Family and Social Services. Confidentiality of the aggrieved party will be strictly maintained in such cases.

98. The GRM will act independently and ensure equitable treatment of women and men, boys and girls, in all decision-making processes. The mechanism will take effect immediately upon commencement of activities under Output 3. The GRM will prioritize mediation and early resolution of conflicts in order to avoid lengthy litigation that may be inconvenient to stakeholders.

99. The GRM does not possess legal mandate or authority to adjudicate issues requiring judicial determination. Rather, it functions as an advisory and facilitative mechanism to resolve concerns between affected persons and implementing entities. Matters requiring formal legal resolution under Maldivian legislation will not be decided through the GRM. Stakeholders retain the right to seek recourse through national legal channels at any time. However, every effort will be made to resolve grievances through dialogue and mediation at the earliest possible tier.

100. Should a complainant wish to pursue legal recourse, the Project will provide support to access appropriate institutions. The PMU will provide contact details of the Attorney General's Office and other relevant authorities and will assist aggrieved persons in accessing these institutions if required. No fees will be charged to complainants for accessing the GRM, and no financial payments will be required for grievances to be addressed under the mechanism.

B. Mechanism

101. A three-tier mechanism is proposed for grievance redress of environmental and social matters related to the implementation and operation of activities under Output 3, including the School Gardening Program and National Urban Agriculture Demonstration Plots. The mechanism will be accessible to students, parents, teachers, school staff, contractors, park visitors, SIFCO personnel, land-owning institutions, community members, and project personnel, any of whom may be complainants. Should a grievance not be resolved or if the complainant is not satisfied with the outcome at a given tier, the complaint will be referred to the next tier for review. Grievance recording forms and registers will be maintained at contractor, institutional, and project levels, as applicable.

102. The grievance redress mechanism (GRM) will operate through three tiers, with access to the national legal system available at all levels. The tier structure will vary slightly depending on the subcomponent, while remaining under one unified Output 3 GRM framework:

103. Tier 1: Site-Level Resolution (Contractor or SIFCO)

For School Gardening activities and most Demonstration Plots, the first point of contact for grievances will be the respective contractor responsible for installation and site works. As such, for the Kudakudhinge Bageecha Demonstration Plot, Tier 1 will be SIFCO in its capacity as site manager. A designated representative will be responsible for receiving, registering, and addressing complaints. Grievances may be submitted verbally or in writing, including through complaint boxes or direct communication with designated staff. All grievances will be recorded in a site-level register. Acknowledgement of receipt will be provided within two working days, and efforts will be made to resolve the grievance. If the grievance cannot be resolved within fourteen working days, or if the complainant is not satisfied with the outcome, it will be escalated to Tier 2.

104. Tier 2: Institutional and Ministry Level

For School Gardening activities, unresolved grievances from Tier 1 will be referred to the respective School Administration and the Ministry of Education. For Demonstration Plots established on public or institutional land, Tier 2 will comprise the respective land-owning institution and the Ministry of Agriculture and Animal Welfare (MoAAW). In the case of Kudakudhinge Bageecha, Tier 2 will be the Ministry of Agriculture and Animal Welfare. The relevant institutions will review the complaint, consult with the contractor and project personnel as necessary, and facilitate resolution within fourteen working days. If the grievance remains unresolved or requires project-level intervention, it will be escalated to Tier 3.

105. Tier 3: Project Management Unit (PMU) Safeguards Team

Grievances not resolved at Tier 2 will be referred to the PMU Safeguards Team. The PMU will review, investigate, and coordinate solutions in consultation with stakeholders. The PMU will ensure that no cost is imposed on the complainant and that decisions are communicated transparently within fourteen working days. All grievances escalated to this level will be documented in the Project GRM Register and reported in project monitoring reports, as applicable.

106. At all tiers, confidentiality will be maintained where requested, and no retaliatory action will be tolerated. The GRM will function in a gender-responsive, culturally appropriate, and inclusive manner and will not impede access to formal judicial or administrative remedies available under Maldivian law.

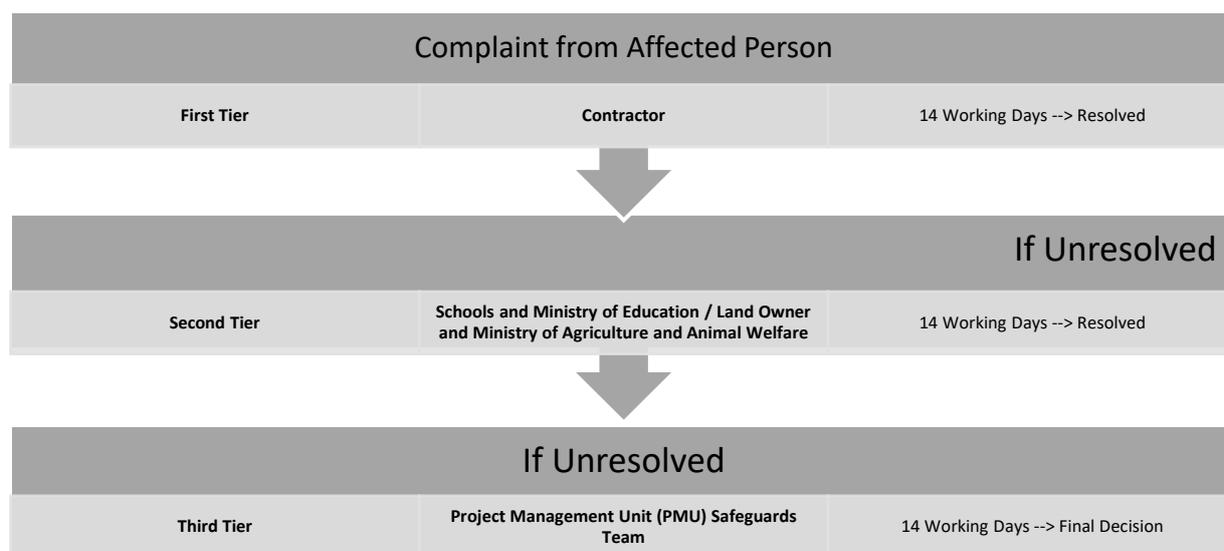


Figure 5 Flow chart of Grievance Redress Mechanism

Table 4 Grievance Redress Mechanism

Focal Person for Contact	Contacts, Communication and Other Facilitation by Project	Timeframe to address grievance
First Tier: Contractor		
Designated contact persons should be established	<ul style="list-style-type: none"> In the Contractor's office and the project site there will be an Information Board providing details of the GRM listing the names, sex and contact telephones/emails. 	14 working days

Focal Person for Contact	Contacts, Communication and Other Facilitation by Project	Timeframe to address grievance
within the Contractor's office with a designated contact number.	<ul style="list-style-type: none"> • In the Contractor's office (for School Gardening activities and National Urban Agriculture Demonstration Plots, except Kudakudhinge Bageecha) and in the SIFCO office (for the Kudakudhinge Bageecha Demonstration Plot), and at the respective 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 focal point. 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 (for School Gardening activities and other Demonstration Plots), from the SIFCO office (for Kudakudhinge Bageecha), School's office (for School Gardening activities), at the Education Ministry (for School Gardening activities), at the Ministry of Agriculture and Animal Welfare (for Demonstration Plots) 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 from the Contractor's office or SIFCO office (as applicable) will assist in filling the complaint form and get it signed by the aggrieved party. • The Contractor's office (for School Gardening activities and other Demonstration Plots) or SIFCO office (for Kudakudhinge Bageecha) 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 Contractor's Office or SIFCO office (as applicable) 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 Contractor's Office or SIFCO office (as applicable) 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 in presence of a witness and the witness should declare their witness to this event. • Where the grievance is related to the project, the Contractor's Office or SIFCO office (as applicable) will come up with a solution either by (i) discussing within the Contractor's Office or SIFCO; (ii) joint problem solving with the aggrieved parties, PMU and the School's office (for School Gardening activities) or relevant landowning institution and Ministry (for Demonstration Plots) and Contractor's Office or SIFCO; or (iii) a combination of both options. • The Contractor's Office or SIFCO office (as applicable) 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 	

Focal Person for Contact	Contacts, Communication and Other Facilitation by Project	Timeframe to address grievance
	<p>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.</p> <ul style="list-style-type: none"> • • 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 School's Office and/or Ministry of Education (for School Gardening activities), or the landowning institution and Ministry of Agriculture and Animal Welfare (for Demonstration Plots, including Kudakudhinge Bageecha), in writing, of the intention to move to tier 2. • The Contractor's Office or SIFCO office (as applicable) will maintain records of all complaints received and share with PMU. 	
Second Tier: Ministry of Education (School Health Department) / Land Owner and Ministry of Agriculture and Animal Welfare		
Designated contact persons should be established within the School's office and Ministry of Education with a designated contact number.	<ul style="list-style-type: none"> • Where the aggrieved party is not satisfied with the outcome of the decision by the Contractor's Office for School Gardening activities and other Demonstration Plots or where the aggrieved party is of the view that the Contractor's Office is not capable of justly solving the issue, or where the grievance is not resolved within 14 working days, the grievance can be upgraded to tier 2. • The Contractor's Office (for School Gardening activities) will forward the grievance to the School's Office and/or Ministry of Education (School Health Department). For Demonstration Plots, the Contractor's Office will forward the grievance to the respective landowning institution and the Ministry of Agriculture and Animal Welfare. As such, for Kudakudhinge Bageecha, SIFCO will forward the grievance to the Ministry of Agriculture and Animal Welfare. • A formal receipt of the complaint will be provided to the aggrieved party. • The School's Office and/or Ministry of Education (for School Gardening activities), or the respective landowning institution and Ministry of Agriculture and Animal Welfare (for Demonstration Plots, including Kudakudhinge Bageecha), will come up with a solution either by (i) discussing within the institution and Ministry; (ii) joint problem solving with the aggrieved parties, undertaking site visits and holding onsite discussions; or (iii) a combination of all these options. • The School's Office and/or Ministry of Education (for School Gardening activities), or the respective landowning institution and Ministry of Agriculture and Animal Welfare (for Demonstration Plots), 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 letter should be read to the person in presence of a witness and the witness should declare their witness to this event. 	14 working days

Focal Person for Contact	Contacts, Communication and Other Facilitation by Project	Timeframe to address grievance
	<ul style="list-style-type: none"> 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 2 then the aggrieved party may notify the Ministry of Tourism and Environment, in writing, of the intention to move to tier 3. The School's Office and/or Ministry of Education (for School Gardening activities), or the respective landowning institution and Ministry of Agriculture and Animal Welfare (for Demonstration Plots, including Kudakudhinge Bageecha), will maintain records of all complaints received and share with PMU. 	
Third Tier: Ministry of Tourism and Environment (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 School's Office and/or Ministry of Education (for School Gardening activities), or by the respective landowning institution and/or Ministry of Agriculture and Animal Welfare (for Demonstration Plots, including Kudakudhinge Bageecha), or where the aggrieved party is of the view that the respective institution is not capable of justly solving the issue, or where the grievance is not resolved within 14 working days, the grievance can be upgraded to tier 3. The School's Office and/or Ministry of Education (for School Gardening activities), or the respective landowning institution and/or Ministry of Agriculture and Animal Welfare (for Demonstration Plots, including Kudakudhinge Bageecha), will forward the grievance to the Ministry of Tourism and Environment. The Ministry of Tourism and Environment 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, Ministry of Education (School Health Department) and the school's office (for School Gardening activities), or the respective landowning institution and Ministry of Agriculture and Animal Welfare (for Demonstration Plots); (iii) undertaking site visits and holding onsite discussions; or (iv) 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. The Ministry of Tourism and Environment 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 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

107. At the first tier, the GRM will be managed at the site level. For School Gardening activities and National Urban Agriculture Demonstration Plots, the first tier will consist of the respective Contractor responsible for implementation. As such, for the Kudakudhinge Bageecha Demonstration Plot, Tier 1 will consist of SIFCO as the site management authority. These entities will be responsible for receiving, registering, and facilitating resolution of grievances related to the implementation and operation of activities within the school premises or demonstration plot site.

108. Under Output 3: School Gardens and Demonstration Plots, Tier 2 will be established at the institutional and ministry level. For School Gardening activities, Tier 2 will consist of the School's Office and/or the Ministry of Education. For Demonstration Plots, Tier 2 will consist of the respective landowning institution and the Ministry of Agriculture and Animal Welfare. The designated focal unit at this level will review grievances escalated from Tier 1 where issues cannot be resolved. The respective institution or Ministry may solicit views from relevant stakeholders as appropriate, including school management, Parent-Teacher Associations, Women's Development Committees, community-based organizations, park management representatives, or other relevant parties, depending on the nature of the grievance.

109. Tier 3 will be formed at the Project Management Unit (PMU) level, through the Ministry of Tourism and Environment. The PMU Safeguards Team, including the Social Safeguards Specialist and relevant project personnel, will review grievances that remain unresolved at Tier 2 or involve broader project-level concerns. The three-tier system will remain in place across all participating schools and demonstration plots, and any aggrieved party, including students, parents, teachers, school staff, contractors, park visitors, institutional staff, or community members, may lodge grievances regardless of their formal affiliation with the site.

110. At the institutional level under Tier 2, the responsible authority (School's Office and/or Ministry of Education for School Gardening activities, or landowning institution and Ministry of Agriculture and Animal Welfare for Demonstration Plots) will function as a small working group to facilitate the timely resolution of concerns, complaints, and grievances related to the environmental and social performance of Output 3 activities. The composition of this group will ensure inclusion of both administrative and welfare perspectives, including where appropriate the involvement of designated focal persons.

111. The PMU in coordination with the Ministry of Education (for School Gardening activities) and the Ministry of Agriculture and Animal Welfare (for Demonstration Plots), will organize the required orientation and training sessions to brief Tier 1 and Tier 2 focal points on their responsibilities, documentation requirements, confidentiality standards, and operation of the GRM.

112. If the aggrieved person is female, the Tier 1 or Tier 2 review should ensure the participation of at least one female member in the grievance handling process. At the institutional level, this may include a female member of school management, the School Counselor (for School Gardening activities), a female representative from the landowning institution (for Demonstration Plots), or another appropriate female staff representative to ensure gender-sensitive handling of the grievance. In case of absence of any designated member during the review process, an appropriate substitute will be nominated by the respective institution to ensure continuity and fairness.

113. At the third tier, the PMU, based in Malé, will have designated staff members, including the Social Safeguards Specialist and Environmental Safeguards Specialist, to address complaints arising from the planning, implementation, and operation of the School Gardening Program and Demonstration Plots under Output 3. The PMU Safeguards Team will liaise

regularly with participating schools, landowning institutions, and the respective Ministries regarding any grievances received. They will also coordinate with relevant national agencies and line departments as required, depending on the nature of the grievance.

114. At all levels of the GRM, the aggrieved party retains the right to seek recourse through the Maldivian judicial system.

115. The PMU will provide support, including contact details of the Attorney General's Office, and will facilitate access for vulnerable individuals or groups where required. No fees will be charged for such facilitation.

116. For project personnel, including PMU staff and HAC technical teams supporting Output 3 activities, institutional policies will define the grievance redress procedures to be followed. General workplace grievances may be addressed through the respective Human Resource Committee or department, while grievances related to sexual exploitation and abuse or sexual harassment will be handled through the relevant SEA/SH committee of the responsible Ministry in accordance with established procedures.

117. For issues pertaining to gender-based violence, sexual exploitation and abuse, and sexual harassment, all grievances must be referred to the hotline number of the Ministry of Gender, Family and Social Services (1421). Confidentiality of those who submit such grievances will be strictly ensured. This information will be clearly displayed on grievance information boards at school sites, demonstration plot sites, Contractor offices, to ensure accessibility.

118. The Affected Persons (APs) have the right to submit their complaint at any time directly to the respective Project Officer at ADB headquarters, in writing and in any of the official languages of ADB's Developing Member Countries. The PMU Social Safeguards Specialist will support complainants in accessing ADB's accountability mechanisms and will provide the relevant contact information as required.

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

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X. CONCLUSION AND RECOMMENDATION

119. The Environmental and Social Due Diligence Review (ESDDR) assessed the proposed School Garden Program and National Urban Agriculture Demonstration Plot activities under Output 3.2 in accordance with ADB's Safeguard Policy Statement (2009) and applicable national regulations. The activities involve small-scale installation of raised beds, hydroponic systems, irrigation lines, composting units, protected growing structures, and related minor improvements within existing school premises and a public park setting.

120. The interventions do not involve land acquisition, involuntary resettlement, restriction of access to resources, or impacts on private land, structures, or livelihoods. All activities will be implemented strictly within existing institutional boundaries. Accordingly, the subproject is classified as Category C for involuntary resettlement and Category C for Indigenous Peoples.

121. Environmental impacts are expected to be minimal, site-specific, and temporary in nature. No land reclamation, dredging, major excavation, significant vegetation clearance, or structural building construction is proposed. Potential impacts such as localized dust, minor noise, small quantities of construction waste, and community safety risks which could be effectively managed through standard good practices and supervision. Based on the scale and nature of works, the subproject is classified as Environment Category C under the ADB SPS 2009.

122. Environmental and safety management during construction will be guided by a PMU-issued Environmental and Safety Monitoring Checklist tailored to small-scale works within school and public premises. Contractors and implementing partners will be required to comply with the checklist and submit brief compliance reports during implementation.

123. During implementation, if any unforeseen social safeguard issue arises, including matters related to land use within school premises, access restrictions, or community concerns, such issues will be addressed in line with the approved Resettlement Framework and other applicable safeguard instruments prepared in conformity with ADB requirements and national laws. The Project will ensure that safeguard procedures are followed and that no stakeholder is disadvantaged during implementation.

124. Prior to commencement of gardening activities, participating schools will conduct information-sharing sessions with students, teachers, parents, and relevant community members to explain the scope of activities, implementation schedule, and safeguard measures. This will ensure transparency and prevent misunderstandings regarding the use of school or public space for project purposes.

125. The Project Grievance Redress Mechanism (GRM) will be established and made fully operational at least three (3) months prior to the commencement of civil works, including designation of responsible focal points, finalization of procedures, and public disclosure of grievance submission channels.

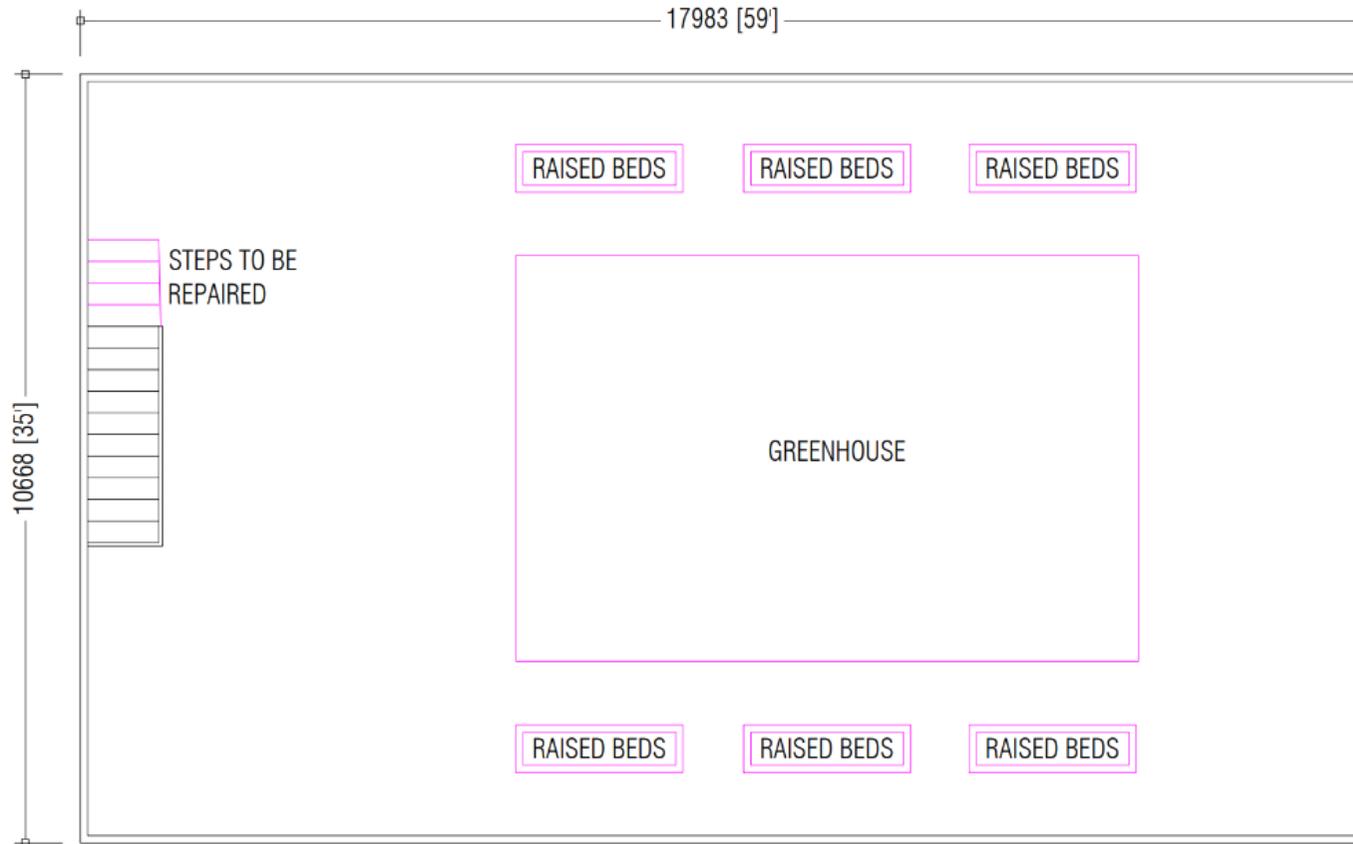
126. The PMU Environmental and Social Safeguards Specialists, in coordination with the Ministry of Education and Maldives National Defense Force for the demonstration plot site, will oversee implementation. Any unforeseen environmental or social issues will be addressed in line with applicable safeguard frameworks and reflected in regular project progress reporting and also include information in the routine and consolidated Semi-Annual Monitoring Reports

of the Project.

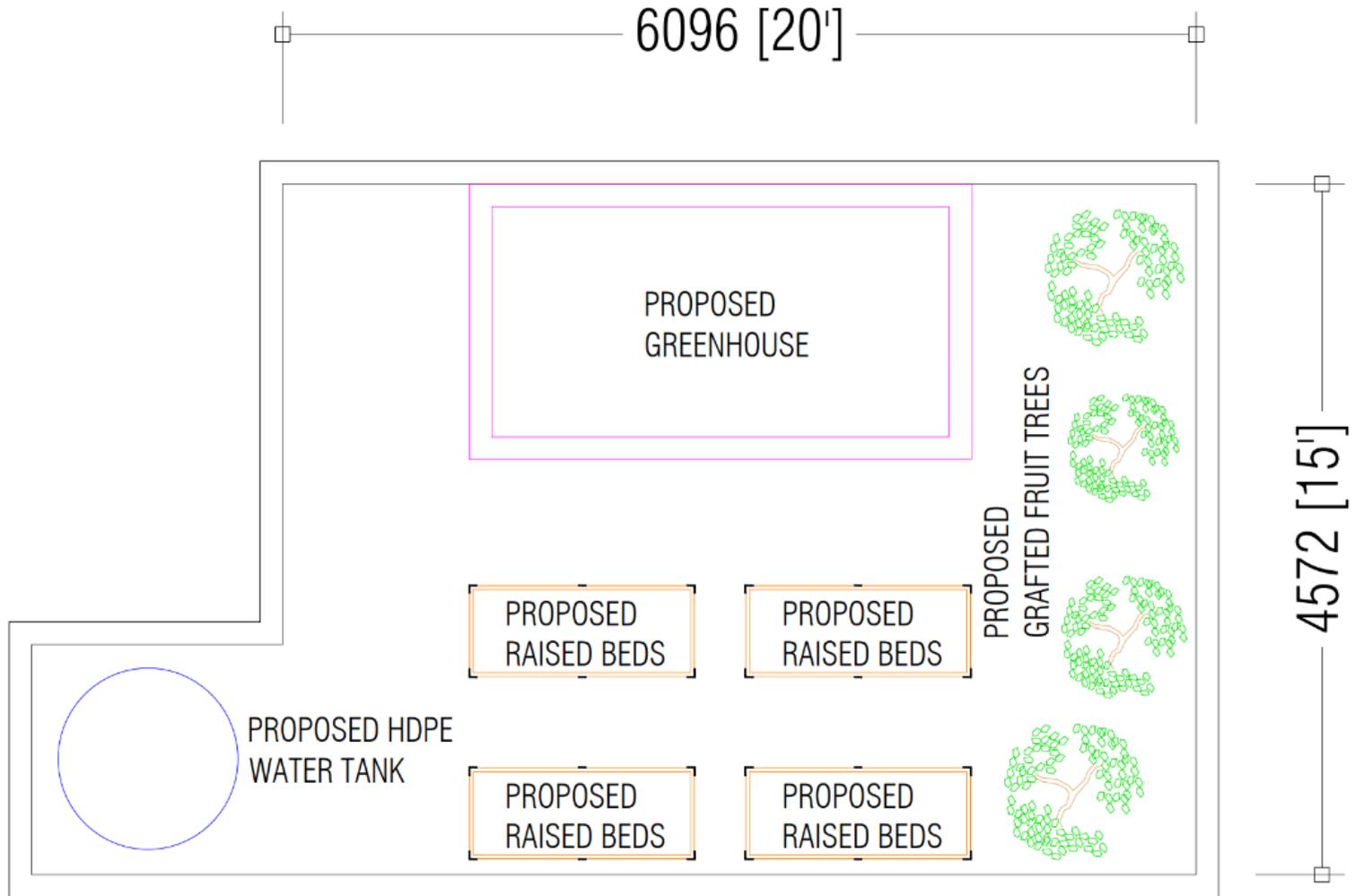
127. Based on the due diligence conducted, no further environmental assessment or safeguard instrument is required for the implementation of Phase 1 activities under Output 3.2.

128. This environment and social due diligence report (ESDDR) forms part of the project safeguard documentation and will guide implementation of the proposed activities.

Annex 2: Concept design for Hiriya School



Annex 3: Concept design for Muhyiddin School



Annex 4: Land Registry

(Requested from Ministry of Education. To attach once received).

Annex 5: Rapid Environment Assessment (REA) Checklist Used to screen the project for environmental risks

Screening Questions	Yes	No	Remarks
A. PROJECT SITING IS THE PROJECT AREA ADJACENT TO OR WITHIN ANY OF THE FOLLOWING ENVIRONMENTALLY SENSITIVE AREAS?			The project area is within the school grounds of 3 schools, and 1 public park managed by the Maldives National Defense Force. Future 3 school gardens and 2 demonstration plots will also be sited in similar areas.
▪ CULTURAL HERITAGE SITE		X	
▪ LEGALLY PROTECTED AREA (CORE ZONE OR BUFFER ZONE)		X	
▪ SPECIAL AREA FOR PROTECTING BIODIVERSITY		X	
▪ WETLAND		X	
▪ MANGROVE		X	
▪ ESTUARY		X	
▪ BAY		X	
IS THE PROJECT AREA ...			
▪ DENSELY POPULATED?		X	
▪ HEAVY WITH DEVELOPMENT ACTIVITIES?		X	
▪ WITH A HIGH PERCENTAGE OF I. WOMEN-HEADED HOUSEHOLDS; II. PERSONS WITH DISABILITY; III. OLDER PERSONS; IV. INCOME POOR POPULATION GROUPS?		X	
B. POTENTIAL ENVIRONMENTAL IMPACTS WILL THE PROJECT CAUSE...			
▪ degradation of cultural property, and/or loss of cultural heritage and tourism revenues?		X	
▪ degradation of land and ecosystems (e.g. loss of wetlands and wild lands, coastal zones, watersheds and forests)?		X	
▪ encroachment on precious ecology resulting in loss or damage to fisheries and fragile coastal habitats such as coral reefs, mangroves, and seagrass beds?		X	
▪ short-term increase in turbidity and sunlight penetration as well as changes in sediment pattern and flows at dredging sites?		X	
▪ removal and disturbance of aquatic flora and fauna at dredging sites?		X	
▪ alteration of bottom surface and modifications to bathymetry, causing changes in tidal bore, river circulation, species diversity, and salinity?		X	
▪ changes in sediment pattern and littoral drift that may cause beach erosion of neighboring areas?		X	
▪ modification of terrestrial habitat by upland disposal of dredged material or covering of potential archaeological sites with dredge spoil?		X	
▪ alteration of surface water hydrology?		X	

<ul style="list-style-type: none"> ▪ deterioration of surface water quality due to silt runoff and sanitary wastes from labour camps and chemicals used in construction? 		X	
<ul style="list-style-type: none"> ▪ poor sanitation and solid waste disposal in construction camps and work sites, and impacts on water, groundwater and/or related urban services? 		X	
<ul style="list-style-type: none"> ▪ possible transmission of communicable diseases (such as STI's and HIV/AIDS) from workers to local populations? 		X	
<ul style="list-style-type: none"> ▪ noise, dust and vibration due to project construction or operation? 	X		There will be minimal localized noise and dust from garden construction and operation activities; dust is suppressed by frequent watering; noise from gardening activities will be minimal and working hours will be limited. Working hours will be coordinated with schools to ensure that no activities that generate noise are undertaken during school teaching hours.
<ul style="list-style-type: none"> ▪ traffic disturbances due to construction material transport and wastes? 	X		All schools and the demonstration plot are located in greater male urban area. Prime traffic near schools are expected during school drop off and pick up times. The timing of transport of material to the site will be coordinated with the schools to ensure minimal disturbance to school operations,
<ul style="list-style-type: none"> ▪ creation of temporary breeding habitats for diseases such as those transmitted by mosquitoes and rodents? 	X		There is potential for generation of mosquito breeding sites, if containers are left in the open or if open pits are dug and left without filling. Proper guidance will be given to the construction supervision team to ensure that no open pits or open containers are left out in the open.
<ul style="list-style-type: none"> ▪ involuntary resettlement of people? (physical displacement and/or economic displacement) 		X	
<ul style="list-style-type: none"> ▪ social conflicts if workers from other regions or countries are hired? 	X		Depending on contractors, it is highly likely that workers from other countries are utilized for the setup of the school gardens. Information on worker code of conduct will be provided to all workers in a language that the workers will understand to ensure that any conflicts are addressed. Further toolbox meetings should be held prior to commencement of work on each day to keep the workers aware of the safety requirements and to make them aware of the tasks planned for the day.
<ul style="list-style-type: none"> ▪ large population influx during project construction and operation that causes increased burden on social infrastructure and services (such as water supply and sanitation systems)? 		X	Large workforce not expected for this as this is a very minor civil work.
<ul style="list-style-type: none"> ▪ disproportionate impacts on the poor, women and children, Indigenous Peoples or other vulnerable groups? 		X	The project is designed to be inclusive of children and young people, with proper safeguards in place.
<ul style="list-style-type: none"> ▪ negative impacts on women's decision-making authority and existing social status or marginalize people of disadvantaged groups? 		X	The three selected schools are each headed by a female principal.
<ul style="list-style-type: none"> ▪ increased challenges for persons with disabilities? 		X	All project infrastructure investments will consider disability guidelines and coordinate with the schools to ensure access as practically as possible.

<ul style="list-style-type: none"> ▪ risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during project construction and operation? 	X		Minor health and safety risks may occur during basic activities such as building raised garden beds, simple paving, and installing small-scale irrigation. These risks are low and can be managed through basic supervision and safe work practices. No hazardous materials or chemicals will be used, and the garden will operate using simple, manual methods suitable for a school setting. Only biopesticides and fertilizers are expected to be used when setting up the gardens.
<ul style="list-style-type: none"> ▪ risks to community health and safety due to the transport, storage, and use and/or disposal of materials such as explosives, fuel and other chemicals during construction and operation? 		X	
<ul style="list-style-type: none"> ▪ deterioration of surrounding environmental conditions due to rapid urban population growth, commercial and industrial activity, and increased waste generation to the point that both manmade and natural systems are overloaded and the capacities to manage these systems are overwhelmed? 		X	
<ul style="list-style-type: none"> ▪ community safety risks due to both accidental and natural causes, especially where the structural elements or components of the project are accessible to members of the affected community or where their failure could result in injury to the community throughout project construction, operation and decommissioning? 		X	
<ul style="list-style-type: none"> ▪ social conflicts if construction depletes local fishery resources on which communities depend for subsistence? 		X	
<ul style="list-style-type: none"> ▪ social concerns relating to local inconveniences associated with port operation (e.g. increased volume of port traffic, greater risk of accidents, communicable disease transmission)? 		X	
<ul style="list-style-type: none"> ▪ generation of wastewater during construction or operation? 	X		Waste water is only expected to be generated in Ghazee school where a sink is planned to be installed for the purpose of washing hands, the sink will be connected to the utility system.
<ul style="list-style-type: none"> ▪ generation of solid waste and/or hazardous waste? 	X		Only minimal waste will be generated during construction phase, this includes packaging waste. The waste will be handled by the contractor and taken to the waste management site at contractors expense. In terms of operational phase only green waste if any is expected to be generated which can be utilized for gardening purpose.
<ul style="list-style-type: none"> ▪ use of chemicals? 		X	Only biopesticides and fertilizers are expected to be used when setting up the gardens and demonstration plots
<ul style="list-style-type: none"> ▪ overconsumption of groundwater, leading to land subsidence, lowered ground water table, and salinization? 		X	The school gardens are designed to use existing and supplemented rainwater stores from school premises.
<ul style="list-style-type: none"> ▪ pollution of receiving waters resulting in amenity losses, fisheries and marine resource depletion, and health problems? 		X	The harvested rainwater from Ghazee and Hiriya School will be tested for any contamination before use.

<ul style="list-style-type: none"> deterioration of water quality due to ship (e.g. ballast water, oil waste, lubricant and fuel spills, sewage) and waterfront industry discharges? 		X	
<ul style="list-style-type: none"> increased noise and air pollution resulting from airborne emissions (e.g. gas, smoke, fumes) from maneuvering and berthing ships and the waterfront industry? 		X	
<ul style="list-style-type: none"> pollution due to improper disposal of expired batteries from weather stations? 		X	
<ul style="list-style-type: none"> loss of indigenous crop varieties due to agricultural intensification? 	X		The school garden program may displace some existing crop varieties; mitigation requires invasive species prevention and use of locally sourced (native) crops
<ul style="list-style-type: none"> environmental contamination by agrochemicals (fertilizers and pesticides)? 	X		Environmental contamination from fertilizers and pesticides is unlikely in a simple school garden program and demonstration plots. Risks can be managed through basic gardening training, limited input use, and organic pest control methods.

Annex 6: Sample safeguards compliance plan for contractors

Topic / Potential Impact	Mitigation and Management Measures	Means of Verification	Responsibility	Monitoring Frequency
Site Safety within School and Public Premises	Barricade active work areas; install visible safety signage; restrict access to tools and materials; coordinate work schedule with school administration to avoid teaching hours	Visual inspection; site photographs; compliance checklist	Contractor; monitored by PMU	Weekly during installation
Worker Identification and Conduct	All workers to wear visible ID name tags; conduct toolbox briefings; enforce basic code of conduct; prohibit unauthorized access	ID checks; toolbox meeting records	Contractor	Weekly
Minor Dust and Noise	Suppress dust by watering if necessary; avoid noisy activities during school hours; limit work to agreed times	Site inspection; coordination records with school	Contractor	Weekly
Waste Generation during Installation	Collect and remove packaging and minor debris; no on-site burning; dispose through municipal system	Waste removal log; visual inspection	Contractor	Weekly
Water Stagnation and Mosquito Breeding	No open containers left exposed; ensure proper drainage; prevent stagnant water accumulation	Site inspection	Contractor	Weekly
Use of Agro-inputs	Only approved biopesticides and limited organic fertilizers permitted; no hazardous chemical storage	Input records; site inspection	School / MNDF; monitored by PMU	Periodic
Occupational Health and Safety	Provide basic PPE; ensure first aid kit available; conduct toolbox briefings; secure tools after working hours	PPE checks; first aid kit check; toolbox records	Contractor	Weekly
Traffic and Material Delivery	Coordinate delivery timing with school; avoid drop-off and pick-up peak hours	Delivery log; school coordination records	Contractor	As required

Community and School Coordination	Inform school administration prior to works; display GRM contact information; address complaints promptly	Meeting minutes; grievance register	Contractor / PMU	Ongoing
Site Restoration after Installation	Remove excess materials; reinstate work areas; ensure no safety hazards remain	Final site inspection	Contractor; verified by PMU	Once at completion

Annex 7: Involuntary Resettlement Impact Screening Checklist

Annex 7a: Involuntary Resettlement Impact Screening Checklist/Subproject 3.2 – Ghaazee School - (Hulhumale’)

Name of Project/Subproject Component: *Enhancing Climate Resilience and Food Security Project / School Gardening Program – Ghaazee School, Hiriya School and Muhyiddin School*
 Location: (Atoll, Island/City, Community): Kaafu Atoll, Hulhumale’, Male’ and Vilingilmale’

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			Minor works within school premises, adjacent to existing plots
2) Will it require permanent and/or temporary land acquisition?		X		Land is Government owned and allocated to Ministry of Education
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		As the construction will not restrict access to all entries, schools will still be to access their premises during the construction works.
5) Are there any non-titled people who live or earn their livelihood at the site?		X		
6) Will there be any loss of business or enterprises?		X		As the construction will not restrict access to all entries, schools will still be to access their premises during the construction works.
7) Will there be any loss of housing land/plots?		X		
8) Will there be any loss of structure (building, boundary wall etc.)?		X		There is no structure in the area identified for the school gardening purposes.
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		The current site is used for school gardening purposes and the design for the garden will incorporate all crops and trees within the site. Minor works within school premises, adjacent to existing plots
11) Will people lose access to facilities, services or natural resources due to the project?		X		Staff and students may experience some temporary disruption to work during the construction phase, which will be mitigated in the EMP. Conduct of consultations and information dissemination prior to start of works.
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.

Annex 7b: Involuntary Resettlement Impact Screening Checklist/Subproject 3.2 – Hirirya School – Male’

2. Screening Questions for Involuntary Resettlement Impact

Involuntary Resettlement Issues	Yes	No	Not Known	Remarks
1) Will the project include any physical construction work?	X			Minor works within school premises, adjacent to existing plots
2) Will it require permanent and/or temporary land acquisition?		X		Land is Government owned and allocated to Ministry of Education
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		As the construction will not restrict access to all entries, schools will still be to access their premises during the construction works.
5) Are there any non-titled people who live or earn their livelihood at the site?		X		
6) Will there be any loss of business or enterprises?		X		As the construction will not restrict access to all entries, schools will still be to access their premises during the construction works.
7) Will there be any loss of housing land/plots?		X		
8) Will there be any loss of structure (building, boundary wall etc.)?		X		There is no structure in the area identified for the school gardening purposes.
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		The current site is used for school gardening purposes and the design for the garden will incorporate all crops and trees within the site. Minor works within school premises, adjacent to existing plots
11) Will people lose access to facilities, services or natural resources due to the project?		X		Staff and students may experience some temporary disruption to work during the construction phase, which will be mitigated in the EMP. Conduct of consultations and information dissemination prior to start of works.
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.

Annex c7: Involuntary Resettlement Impact Screening Checklist/Subproject 3.2 – Muhyiddin School – Vilimale'

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			Minor works within school premises, adjacent to existing plots
2) Will it require permanent and/or temporary land acquisition?		X		Land is Government owned and allocated to Ministry of Education
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		As the construction will not restrict access to all entries, schools will still be to access their premises during the construction works.
5) Are there any non-titled people who live or earn their livelihood at the site?		X		
6) Will there be any loss of business or enterprises?		X		As the construction will not restrict access to all entries, schools will still be to access their premises during the construction works.
7) Will there be any loss of housing land/plots?		X		
8) Will there be any loss of structure (building, boundary wall etc.)?		X		There is no structure in the area identified for the school gardening purposes.
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		The current site is used for school gardening purposes and the design for the garden will incorporate all crops and trees within the site. Minor works within school premises, adjacent to existing plots
11) Will people lose access to facilities, services or natural resources due to the project?		X		Staff and students may experience some temporary disruption to work during the construction phase, which will be mitigated in the EMP. Conduct of consultations and information dissemination prior to start of works.
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.

Annex 7d: Involuntary Resettlement Impact Screening Checklist/Subproject 3.2 – Kudakudhinge Bageecha – Male’

4. Screening Questions for Involuntary Resettlement Impact

Involuntary Resettlement Issues	Yes	No	Not Known	Remarks
1) Will the project include any physical construction work?	X			Minor works within school premises, adjacent to existing plots
2) Will it require permanent and/or temporary land acquisition?		X		Land is Government owned and allocated to Ministry of Defence
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		As the park is not operational 24/7, access remains at their opening hours to the park premises during the park opening hours and mitigation measures will be taken to ensure that.
5) Are there any non-titled people who live or earn their livelihood at the site?		X		
6) Will there be any loss of business or enterprises?		X		As the park is not operational 24/7, access remains at their opening hours to the park premises during the park opening hours and mitigation measures will be taken to ensure that.
7) Will there be any loss of housing land/plots?		X		
8) Will there be any loss of structure (building, boundary wall etc.)?		X		There is no structure in the area identified for the demonstration plot.
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		The current site is used for gardening purposes and the design for the demonstration plot will incorporate all crops and trees within the site. Minor works within school premises, adjacent to existing plots
11) Will people lose access to facilities, services or natural resources due to the project?		X		Visitors and staff may experience some temporary disruption to work during the construction phase, which will be mitigated in the EMP. Conduct of consultations and information dissemination prior to start of works.
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.

5. 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.
- Has No IR impact, no RP is required. A due diligence report (DDR) for the subproject has to be prepared.

Prepared by: Aminath Shareef

Position: Social Safeguards Specialist

Signature:

Date:

Annex 8: Minutes of Consultation Meetings

Annex 8a: Meeting with Ghaazee School

Meeting with Ghaazee school regarding School Garden Program

Date: 22 December 2025

Location: Ghaazee School, Hulhumale'

Name	Organization
Basheera Mohamed	Ghaazee School
Azeez	Ghaazee School
Mohamed Hamdhaan Zuhair	PMU (ECRFS)
Ramsha A.Sattar	PMU (ECRFS)
Aminath Shaliny	PMU (ECRFS)
Aminath Shareef	PMU (ECRFS)

Discussion Points:

- Open to the school garden program in general and requested landscaping of the open area to the side of the entrance to the school. The principal conveyed interest in the integration of herbal tea flowers to the existing garden, with the possibility of distributing tea to parents during special events.
- Provided information on other related types of projects; the development of hydroponic horizontal system with support from the Ministry of Agriculture and Animal Welfare and the gardening project for students with disability supported by Maldives Airport Company Limited (MACL)
- Active school science club with support from students in leadership roles.

Action Items

- Ghaazee school to share details of the plans of the related other projects.
- To visit the school again with the Urban Agriculture Specialist.

Annex 8b: Meeting with Hiriya School

Meeting with Hiriya school regarding School Garden Program

Date: 07 January 2026

Location: Hiriya School, Male'

Name	Position	Organization
Dhiyana	Deputy Principal	Hiriya School
Mohamed Hamdhaan Zuhair	Project Manager	PMU (ECRFS)
Mohamed Afraz	Engineer	PMU (ECRFS)
Ramsha A.Sattar	Comms & BCC Specialist	PMU (ECRFS)
Aminath Shaliny	Gender Expert	PMU (ECRFS)
Ali Atheel	Financial Manager	PMU (ECRFS)
Hassan Shuabee	Urban Agriculture Specialist	ADB

Discussion Points

- Welcomed the school garden program to further develop hydroponic systems established in the green house located at the terrace. In addition, it was discussed to upgrade the green house including the roof covering, build vertical towers etc. Also, outside the green house to plant fruit trees on the raised beds.
- As part of the Travel & Tourism class, the school has built habitable mock-ups for resort set-up in different rooms of the school. The school garden developed will contribute to the use of this set-up once its integrated to the lesson plan.

Action Items

- The Urban Agriculture Specialist to develop the design and share with the schools for their feedback

Annex 8c: Meeting with Muhyiddin School

Meeting with Muhyidheen school regarding School Garden Program

Date: 31 December 2025

Location: Muhyidheen School, VilliMale'

Name	Position	Organization
Nazima Ali Manik	Principal	Muhyidheen School
Mohamed Hamdhaan Zuhair	Project Manager	PMU (ECRFS)
Ramsha A.Sattar	Comms & BCC Specialist	PMU (ECRFS)
Aminath Shaliny	Gender Expert	PMU (ECRFS)
Ali Atheel	Financial Manager	PMU (ECRFS)
Hassan Shuabee	Urban Agriculture Specialist	ADB

Discussion Points

- Accepting the school garden program. The principal proposed further developing the terrace area as part of the school garden program. It was decided to develop a green house, in addition to cultivating grafted fruit trees and planting fruit trees on raised beds.
- The environment club – FRAUNA is very active.

Action Items

- The Urban Agriculture Specialist to develop the design and share with the schools for their feedback

Annex 8d: Meeting with Ministry of Education

Date: 01 February 2026 (Sunday)

Location: Velaanaage 9th Floor, Meeting room 3

Time: 10:00 – 11:00 AM

Purpose:

To share updates of the school gardening program with MoE's School Health and Safety Division (SHSD)

Name	Position	Contact details	Organization
Hussain Shuabee	Consultant, Urban Farming	shuabee2@gmail.com 7862901	ADB
Fathimath Azza	Director General, SHSD		MoE
Hussain Rasheed Moosa	Deputy Director General, SHSD		MoE
Aminath Fazeela	SHSD	aminath.fazeela@moe.gov.mv	MoE
Mohamed Hamdhaan Zuhair	Project Manager PMU ECRFSP	hamdhaan.zuhair@environment.gov.mv 7668606	MoTE
Ahmed Waheed	Director, Environmental Adaptation & Resilience	ahmed.waheed@environment.gov.mv 9607758896	MoTE
Ramsha Abdul Sattar	Comms and BC Specialist PMU ECRFSP	ramsha.sattar@environment.gov.mv 7734223	MoTE
Aminath Shaliny	Gender Expert, PMU ECRFSP	aminath.shaliny@environment.gov.mv 9762172	MoTE
Ahmed Shazeen Salim	Programme Analyst, PMU ECRFSP	Ahmed.shazeen@environment.gov.mv 7527159	MoTE

1. Brief Discussion Points

The ECRFSP team provided an update on the proposed School Gardening Program under Output 3 (Promote climate-smart technologies and practices in agri-food systems) of the project, with a focus on urban agriculture and school-based gardening.

It was confirmed that three pilot schools have been selected and agreed upon for implementation:

- Gaazee School

- Hiriya School
- Muhyiddin School

The school orientation session was tentatively scheduled for 14 February 2026, to be held at Meerumaa, serving as a launch and planning session primarily for school representatives and relevant stakeholders.

Proposed garden designs and concepts were presented:

- **Gaazee School:** A themed *Tea Garden* focusing on flowers and herbs (hibiscus, rose, ginger, mint, herbs), grafted fruit trees (lemon, mango), and integration with an existing hydroponic area. The design utilizes existing pathways and includes development of a garden hut and simple tea-infusion equipment.
- **Hiriya School:** Upgrading existing greenhouse and hydroponic systems using durable polycarbonate sheets; introducing vertical tower systems for leafy greens; developing plant support structures for passionfruit and cucumber; and linking the garden to an existing school kitchen project.
- **Muhyiddin School:** Exploring suitable crops with a focus on nutritional value (e.g., cucumber, leafy vegetables). Composting systems will be introduced across all three schools.

The importance of sustainability and continuity beyond project completion was emphasized. The orientation session on 14 February will include development of school-specific sustainability plans, drawing lessons from previous gardening initiatives.

Discussions highlighted the use of produce primarily for educational and nutritional purposes, with the option to sell surplus produce. Any income generated may be managed through PTA trust funds to support school clubs and related activities.

Existing rainwater harvesting and irrigation systems at Hiriya School were discussed as opportunities to strengthen climate resilience, subject to further technical drawings and layouts from the schools.

Participant composition for the 14 February session was discussed, with agreement to include:

- Targeted school clubs (e.g. science clubs, scouts, girl guides)
- Selected teachers and school management
- Relevant MoE officials

Parents will be engaged during school-level sessions to be held later.

Future scale-up plans were briefly discussed, including potential expansion to schools in Addu, Hulhumeedhoo, and Kulhudhuffushi, with documentation and content creation to support replication and knowledge sharing.

It was confirmed that no chemical pesticides will be used in school gardening activities; only bio-pesticides will be applied.

2. Action Points

- SHSD (MoE) to share school layout drawings and relevant infrastructure details (including rainwater tanks and irrigation systems) for Gaazee, Hiriya, and Muhyiddin Schools.

- ECRFSP team to refine garden designs and sustainability plans based on school layouts and feedback.
- ECRFSP team to finalize the agenda and participant list for the 14 February orientation session and share details with MoE.
- MoE / SHSD to advise on and facilitate the issuance of official invitation letters to relevant MoE officials for the orientation session.
- ECRFSP team to incorporate thematic concepts (e.g. crop-based or color themes) for each school garden as suggested.
- Schools, with support from MoE, to manage post-handover activities such as watering, maintenance, and weekend care of the gardens.

3. Photos from the meeting:



Annex 8e: Meeting with SIFCO

Meeting with Sifainge Co-Operative (SIFCO) regarding the demonstration plot in Kudhakudhinge Bageecha

Date: 21 November 2025

Location: Magoo Maalam (Godown building)

Name	Position	Organization
Lt Col Hussan Shareef	Secretary - SIFCO	SIFCO, Maldives National Defense Force
Hassan		SIFCO, Maldives National Defense Force
Hassan Shuabee		Urban Agriculture Consultant (ADB)
Ahmed Waheed	Director	CCD, MoTE
Hussain Faisal	Director General	MoAAW
Mohamed Hamdhaan Zuhair		PMU (ECRFS)
Ramsha A.Sattar		PMU (ECRFS)
Ali Atheel		PMU (ECRFS)

Discussion Points:

- The proposal shared was discussed, including the methods used for demonstration plots, responsibilities of the involved parties and the financial proposal.
- SIFCO team shared their concerns regarding some of the roles and responsibilities mentioned in the proposal; particularly of theirs in the maintenance of the demonstration plot as the staff in the garden will not have the expertise. The ECRFS team ensured that from the set-up the technical training will be provided as specified in the proposal.
- In addition, it was confirmed that no financial cost will be undertaken by SIFCO, however, they will be responsible for the construction works to set-up the demonstration plots.
-

3. Action Items

- ECRFS team to share a simplified task list in Dhivehi and share for confirmation.
- SIFCO will notify after getting approval for the activity from the Ministry of Defense.

4. Photos from the meeting

