

Environmental Monitoring Report

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Maldives: Enhancing Climate Resilience and Food Security Project

Prepared by the Ministry of Tourism and Environment and endorsed by the Ministry of Finance of the Republic of Maldives for the Asian Development Bank (ADB).

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Abbreviations

ADB	-	Asian Development Bank
DDR	-	Due Diligence Report
EARF	-	Environmental Assessment and Resettlement Framework
EIA	-	Environmental Impact Assessment
EMP	-	Environmental Management Plan
EPA	-	Environmental Protection Agency (now ERA)
ERA	-	Environmental Regulatory Authority
GOM	-	Government of the Republic of Maldives
GRM	-	Grievance Redress Mechanism
HAC	-	Hanimaadhoo Agricultural Centre
PAM	-	Project Administration Manual
PIU	-	Project Implementation Unit
PMU	-	Project Management Unit
IA	-	Implementing Agency
IEE	-	Initial Environmental Examination
MAAW	-	Ministry of Agriculture and Animal Welfare
MMS	-	Maldives Meteorological Services
MOECCT	-	Ministry of Environment, Climate Change and Technology (now MOTE)
MOF	-	Ministry of Finance
MOTE	-	Ministry of Tourism and Environment
RF	-	Resettlement Framework
SEMR	-	Semi-annual Environmental Monitoring Report
SPS	-	Safeguard Policy Statement
WDC	-	Women's Development Committee

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Executive Summary

This Semi-Annual Environmental Monitoring Report (SEMR) covers the period July to December 2025 for the Enhancing Climate Resilience and Food Security Project. It is the second SEMR prepared since loan effectiveness in March 2025 and provides updates on project implementation, safeguards, and compliance with the Environmental Management Plan (EMP) and loan covenants.

The Project aims to strengthen Maldives' resilience to climate change by (i) strengthening climate and disaster risk-informed advisory and early warning systems; (ii) implementing flood mitigation, coastal protection, and mangrove restoration in Kulhudhuffushi; (iii) promoting climate-smart agriculture through new facilities, training, and urban farming initiatives in Haa Dhaalu and Addu; and (iv) supporting adaptation businesses with matching grants targeted at women, youth, and small enterprises.

Ministry of Finance is the Executing Agency, with the Ministry of Tourism and Environment and Ministry of Agriculture and Animal Welfare as Implementing Agencies. The Project Management Unit (PMU), based in the Climate Change Department of the Ministry of Tourism and Environment, has been established and key safeguards positions have been filled. Recruitment for remaining technical positions is ongoing. Other key partners include the Maldives Meteorological Service and Kulhudhuffushi City Council.

During this reporting period, project activities included an ADB mission, mobilization of two technical assistance contracts for detailed design and modelling studies, preparation of bidding documents for radar system installation and upgrades at the Hanimaadhoo Agricultural Centre, and stakeholder consultations with relevant agencies and councils. No changes have been made to project design or construction methods.

The Project is classified as Category B under ADB's Safeguard Policy Statement (2009), requiring Initial Environmental Examinations (IEEs) for all subprojects. Environmental screening conducted during the reporting period confirmed that the HAC upgrading works will require an Environmental Impact Assessment (EIA), while the Addu radar installation will proceed under an Environmental Management Plan (EMP). Safeguards provisions have been incorporated into draft bidding documents.

Loan covenant compliance is ongoing. Environmental requirements are being incorporated into bid documents, and the project is aligned with resettlement and indigenous peoples safeguards.

The Grievance Redress Mechanism (GRM) framework has been established, translated into Dhivehi, and introduced to key stakeholders. However, the mechanism is not yet fully operational or publicly disclosed. No grievances were recorded during this reporting period.

EMP compliance remains at the preparation stage. Baseline environmental monitoring will be carried out prior to the start of civil works, and monitoring metrics are being developed to guide project staff.

Key issues identified include the need to finalize recruitment of remaining technical staff and to operationalize and publicize the GRM across project sites and stakeholders. Corrective actions are underway to address these gaps.

Overall, the Project remains in its preparatory phase. Progress has been made in institutional establishment, technical studies, safeguards integration, and stakeholder coordination, and safeguards implementation is expected to strengthen further as procurement and construction activities commence in upcoming reporting periods.

I. Introduction

A. About this Report

1. This is the Semi-annual Environmental Monitoring Report (SEMR) prepared by the Ministry of Tourism and Environment of the Republic of Maldives for the Enhancing Climate Resilience and Food Security Project (the Project) for the monitoring period of July 2025 to December 2025. This report is the 2nd SEMR since the loan effectiveness on 9 March 2025. This SEMR provides the status of the Project, presents preparation and implementation of environmental management, mitigation and monitoring actions, and reports status of compliance with Environmental Management Plans (EMPs) and loan covenants.

B. Project Description

2. The project will support Maldives' efforts to reduce the vulnerability of island communities to climate risks by (i) improving institutional and community capacities for climate change adaptation; (ii) implementing effective flood and coastal protection with nature-based solutions; (iii) introducing climate-smart technologies and practices in agri-food systems; and (iv) promoting climate adaptation businesses and services, and urban farming. Over the long term, the project will contribute to improving the country's climate and disaster resilience, and food and nutrition security, as outlined in its updated nationally determined contribution (NDC).

3. The Project will have the following four outputs:

(i) **Output 1: institutional and community capacity for climate adaptation improved.** To strengthen the climate resilience of Haa Dhaalu and Addu atolls, the project team will help improve climate and disaster risk-informed advisory and early warning systems by (i) installing a new radar system at Addu weather station; (ii) repairing the existing weather radar system in Malé; (iii) providing MMS with integrated data processing and analysis systems for real-time monitoring, forecasting, and early warning; (iv) piloting agro-climate advisories on selected agricultural islands; and (v) designing and delivering a capacity building program on weather monitoring, forecasting, and early warning and communication to encourage communities to adopt climate change adaptation measures. Community preparedness for managing extreme events will be strengthened through inclusive planning for disaster response and recovery, awareness raising of communities, and behavioral change campaigns. These activities will incorporate gender-responsive and inclusive elements.

(ii) **Output 2: Effective flood and coastal protection with nature-based solutions implemented.** The project will implement infrastructure and nature-based solutions for pluvial flood mitigation, coastal protection, and mangrove restoration on Kulhudhuffushi Island, which is the most populous island in the northern region. Stormwater drainage and filtration systems, and nature-based solutions such as bioswales will be constructed for inland flood protection. Offshore and nearshore coastal protection structures will be improved to prevent overtopping and erosion. The island's long-term protection and resilience will be supported through the development of a drainage management plan and a mangrove restoration and management plan. The project team will reduce the climate and disaster risks of the island by (i) conducting environmental and hydraulic modeling studies, (ii) preparing detailed designs of pluvial flood and coastal protection investment subprojects, and (iii) carrying out integrated flood risk management measures through those investment subprojects. The output will include subprojects that cover (i)

construction or upgrades of stormwater drainage infrastructure; (ii) coastal protection measures on the eastern shoreline; and (iii) nature-based solutions such as the rejuvenation of wetlands and urban greeneries to increase infiltration and flood retention capacity.

- (iii) **Output 3: Climate-smart technologies and practices in agri-food systems promoted.** To overcome the constraints of limited topsoil and fresh water, the project will promote water- efficient and resilient urban farming, mainly in Haa Dhaalu and Addu atolls, through (i) the construction of a multipurpose building to house a training facility, a simple laboratory for soil and pathogen testing, and an office space for the Hanimaadhoo Agriculture Center (HAC); (ii) training programs, extension advisory services, and associated capacity building support for urban home gardeners, farmers, cooperatives, women’s development committees (WDCs), civil society organizations (CSOs), and women and young agribusiness entrepreneurs; (iii) technical advice on preparing and implementing urban farming and agribusiness proposals, including the creation of market links and adoption of climate-smart horticultural technologies for better profit and income generation; and (iv) project management activities.
- (iv) **Output 4: Climate adaptation business and services, and urban farming implemented.** The project will support the long-term growth of adaptation-related businesses by providing matching grants to trained beneficiaries of output 3 and other individuals; farmer groups; WDCs; CSOs; and micro, small, and medium-sized enterprises in Maldives. The grants will be awarded based on a set of qualification and selection criteria detailed in the project administration manual (PAM). The project team will (i) finalize the operational guidelines for the matching grants and launch the grant scheme; (ii) evaluate and approve grant proposals; and (iii) monitor the implementation of the grant-supported projects. SME Development Finance Corporation (SDFC), which is experienced in supporting the development of micro, small, and medium-sized enterprises with concessional credit lines, will administer the identification, evaluation, selection, and approval process of the grant proposals. The grants will finance the full cost of capital expenditures of eligible adaptation business proposals, particularly ones proposed by women and youth-led enterprises and will be matched by beneficiaries’ contributions that cover the operating costs.

C. Environmental Categorization of the Project

4. The Project is classified as Category B according to ADB Safeguard Policy Statement (SPS), 2009 (project components judged to have some adverse environmental impacts, but of lesser degree and/or significance than those for Category A). All subprojects are classified as Category B, and the impacts of all subprojects are assessed through Initial Environmental Examination (IEE) as per ADB SPS, 2009.

D. Overall Project Progress Status

5. The PMU has been established and key safeguards positions have been filled, including the Environmental Safeguards Specialist, Social Safeguards Specialist, and Gender Specialist. The PMU has also received safeguards-related training. Recruitment for remaining technical positions is ongoing and is expected to be completed in the first quarter of 2026.

6. Safeguards capacity within the PMU was strengthened through an ADB mission conducted in September 2025, during which the safeguards team received orientation on project safeguard requirements and implementation procedures.

7. The project-level Grievance Redress Mechanism (GRM) framework has been established and introduced to key stakeholders, and focal points have been identified. However, the mechanism is not yet fully operational or publicly disclosed. Further steps are required to publicize the GRM and make submission channels available through the project website and at relevant project sites. No grievances have been submitted as of the date of this report

8. Technical studies supporting Output 2 advanced during the reporting period. Two Technical Assistance contracts for mangrove and groundwater hydrology modelling and for marine and coastal modelling were mobilized under ADB management. Consultants submitted inception reports, deployed monitoring equipment, and completed initial data collection missions to support flood risk assessment and coastal modelling in Kulhudhuffushi.

9. Procurement preparation also progressed. Bidding documents were prepared for the radar system installation package and the design-build upgrading of the Hanimaadhoo Agricultural Centre (HAC), with safeguards provisions integrated in accordance with ADB requirements. Environmental screening confirmed that the HAC upgrading works will require an Environmental Impact Assessment (EIA), while the Addu radar installation will proceed under an Environmental Management Plan (EMP). Aviation clearances and site demarcation for the Addu radar installation were also completed.

10. Stakeholder consultations and technical coordination meetings were held with relevant agencies and consultants to support data sharing, site planning, and technical inputs for ongoing studies and project preparation activities.

11. The Project Steering Committee was convened on 29 December 2025, during which the first meeting was held to review overall project progress and endorse the 2026 Annual Work Plan.



Figure 1 Project Locations

(A) Hanimaadhoo Island (HDh), Output 3 site, showing Hanimaadhoo Agricultural Centre (HAC) area marked in pink; (B) Kulhudhuffushi Island (HDh), Output 2 site, covering island-wide drainage system and eastern coastline works; (C) Hulhule' Airport Island (K), Output 1a site, with radar installation location marked in pink; (D) Gan Airport Island (S), Output 1b site, with radar installation location marked in pink.

II. Project Implementation Arrangements

A. Project Contracts and Management

12. The following table presents the project implementation arrangements.

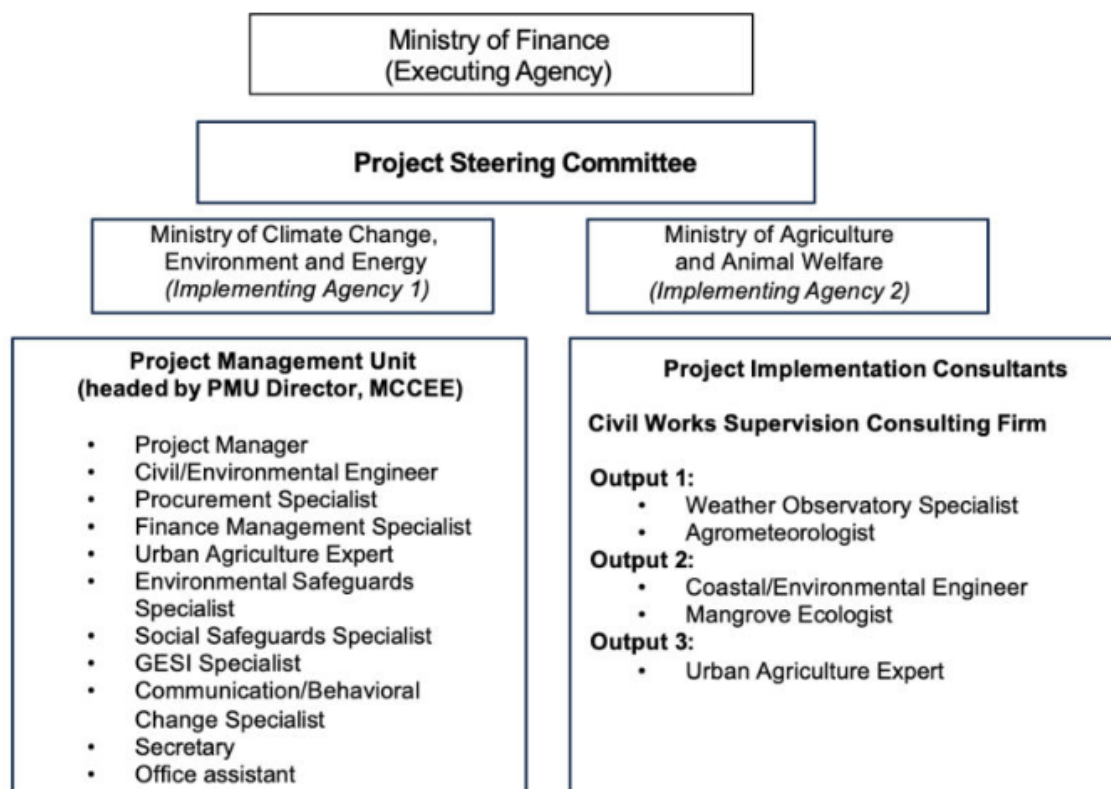
Table 1 Project Implementation Organizations: Roles and Responsibilities

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 (CCD). Headed by Project Director nominated by MOTE and supported by a dedicated Project Manager.	<ul style="list-style-type: none"> - Responsible for overall project management, implementation and monitoring - 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

	<ul style="list-style-type: none"> - 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
Maldives Meteorological Service	<ul style="list-style-type: none"> - Support day-to-day project management, monitoring, and evaluation under Output 1 - Support PMU in procurement of goods and works under Output 1 - Provide technical and institutional capacity building support linked to Output 1 - Support PMU with preparing project progress reports and other reports - Ensure system for sustainable operation and maintenance (O&M) of project facilities supported under Output 1
Kulhudhuffushi City Council	<ul style="list-style-type: none"> - Provide local coordination and technical support to all activities and subprojects under Output 2 - Be responsible for management and O&M of infrastructure - Co-lead the Output 2 activities on knowledge management on drainage management plan, mangrove management plan and related activities
Grant Committee for Small Grants Scheme Established by PMU under MOTE Chair: TBD Members: TBD	<ul style="list-style-type: none"> - Provide consultation for the waves of call for proposals for beneficiary categories - Review and approve grant applications
SME Digital (Previously SME Development Finance Corporation)	<ul style="list-style-type: none"> - Receive, screen and review grant applications under Output 4 - Submit screened applications, including all documents, to the MOCCEE grant committee - Receive invoices, bank statements and physical outputs from grantees
ADB	<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 the likelihood of attaining the project's immediate development objective - 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

B. Key Persons Involved in Safeguarding Implementation

Figure 2 Project Organizational Structure and Staffing



Project Management Unit

Project Manager

Mohamed Hamdhan Zuhair
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Environmental Safeguards
Specialist

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Social Safeguards Specialist

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Gender and Social Inclusion
Specialist

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Communication/Behavioral Change
Specialist

Ramsha Abdul Sattar
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Finance Management Specialist

Ali Atheel
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Procurement Specialist

Abdulla Aiham Mohamed
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Civil/Environmental Engineer

Hiring ongoing

Urban Agriculture Specialist

Hiring ongoing

Contractors

No contracts with safeguards
requirements awarded yet

C. Safeguard and OHS Training for Environment and Social Safeguard Staff

13. The Environmental and Social Safeguard Staff were trained in person on the field. Details of the trainings are in Table 2.

Table 2 Safeguard and OHS Training Conducted for Environmental and Social Safeguard Staff

Date	Training	Provider	Mode	Duration	Staff Attended	Key Topics Covered
22-23 September 2025	On site Safeguard Assessment and OHS Orientation	ADB Safeguards team	In person, on field	2 days	Fathmath Hulwa Khaleel, Environmental Safeguards Specialist; Aminath Shareef, Social Safeguards Specialist	Practical approach to safeguard screening and assessment; application of ADB SPS 2009 requirements; review of key project safeguard documents including EARF, IEE, EMP, DDR, and reporting templates; site level risk identification and mitigation measures; Grievance Redress Mechanism updates; OHS considerations during field assessments

III. Project Implementation Status

A. Project Activities During Current Reporting Period

14. The following table details the project activities that took place in the current reporting period.

Table 3 Project Implementation Activities in Current Period

Project Activity	Date
Hiring of PMU members: <ul style="list-style-type: none"> - Project Manager - Financial Management Specialist - Environmental Safeguards Specialist - Gender Expert - Social Safeguards Specialist - Communications and Behaviour Change Specialist - Procurement Specialist 	<ul style="list-style-type: none"> -1 September 2025 -17 August 2025 -3 August 2025 -3 August 2025 -5 August 2025 -7 August 2025 -23 September 2025
Announcement for PMU members: <ul style="list-style-type: none"> - Civil Engineer - Urban Agricultural Specialist - Program Analyst 	Q4 2025
ADB mission and training of PMU Safeguards team	September 2025
CS08 Mangrove and Groundwater Hydrology Modeling and Detailed Design Study (ST1) <ul style="list-style-type: none"> - Inception report submitted and reviewed by PMU - Meeting with PMU on - Data gathering devices deployed and 1 data gathering mission completed 	Q2 2025
CS07 Marine and Coastal Modeling and Detailed Design Study (ST2) <ul style="list-style-type: none"> - Inception report submitted and reviewed by PMU - Meeting with PMU on - Data gathering devices deployed and 1 data gathering mission completed - Draft survey report submitted and reviewed by PMU 	Q3-4 2025
Finalization of Bidding Documents <ul style="list-style-type: none"> - Putting together bidding documents, including safeguards provisions for ADB approval for two packages: <ol style="list-style-type: none"> 1. G01: Design, Supply and Installation of Radar System – including civil works for radar tower building, training and after-sale services 2. CW02: Design-built upgrading of HAC facilities 	Q3-4 2025
Local Environment Screening <ul style="list-style-type: none"> - Screening of HAC upgrade works resulted in requirement of EIA - Screening of Addu Radar works resulted in requirement of EMP 	18 September 2025
Addu Radar Site Finalization and Demarcation Works Aviation Clearances <ul style="list-style-type: none"> - MMS consulted - Aviation clearance received - AIA clearance received - Demarcation works completed 	Q3-4 2025
Grievance Redress Mechanism Established <ul style="list-style-type: none"> - The GRM has been updated and translated to Dhivehi and circulated among stakeholders - Key meetings have taken place to introduce GRM to Kulhudhuffushi City Council and Addu International Airports Company 	Q4 2025

Project Webpage Establishment - Live at https://www.environment.gov.mv/v2/en/project/33587	Q3 2025
Urban Farm Training Plan Prepared Once the scope of these activities are approved, Environmental Safeguards requirement will include screening any subprojects as required	Q4 2025
Matching Grant Plan Draft Developed Once the plan is finalized, Environmental Safeguards requirement will include developing checklists that applicants can use	Q4 2025
Gender Orientation Workshop Gender Orientation Workshop was conducted to strengthen understanding and implementation of the project's Gender Action Plan. Representatives from key implementing agencies participated and discussed practical application, monitoring, and reporting of gender commitments. The session was facilitated by ADB and PMU gender specialists.	18 November 2025
First Steering Committee Meeting The first Steering Committee meeting of the Enhancing Climate Resilience and Food Security Project was held on 29 December 2025, chaired by the Ministry of Tourism and Environment with participation from key agencies, ADB, and the PMU. The Committee reviewed project progress, financial status, and implementation challenges, and approved the 2026 work plan. Discussions focused on procurement of weather radar systems, flood and coastal studies in Kulhudhuffushi, gender mainstreaming, safeguards compliance, and rollout of the matching grant scheme. The Committee emphasized timely procurement, stronger coordination, and proactive risk management. Subsequent meetings were scheduled for April and June 2026.	29 December 2025

B. Description of any Changes to Project Design

15. A minor refinement to Output 3 is currently underway to incorporate agricultural training components. As part of this, a School Garden Program and national agricultural demonstration plots are being developed. These activities will involve small scale civil works, such as installation of garden beds, basic paving, and simple piped irrigation. The proposed activities will be subject to environmental screening, preparation of a due diligence report and progress reported in the next SEMR.

C. Description of any Changes to Agreed Construction Methods

16. The project is not at construction phase and there have been no changes.

IV. Compliance with Statutory Environmental Requirements

A. Status of Clearances

17. Detailed status of each clearance/permission is provided in Table 4.

Table 4 Status of Statutory Clearances

Package/ Subproject	List of clearances /permissions required	Status	Validity period	Remarks
1.1 Addu weather radar system including tower	Screening decision from ERA to finalize level of assessment	Obtained on 18 September 2025	18 September 2026	Decision Statement: EMP required
	Construction permit from AIA	Obtained.	No expiry	Contingent on the current design and on following CAA's recommendations.
	EMP approval by ERA	Ongoing.	-	Announcement for hire of local EIA consultant done, hiring process ongoing.
1.2 Male' radar upgrades	Screening decision from ERA to finalize level of assessment	Not yet due	-	Male' radar design details to be finalized before it can be submitted for screening. Working with MMS to identify design requirements.
2.1 Inland drainage network improvements, including bioswale	Requires EIA DS from ERA	Not yet due	-	-
2.2 Measures of the protection of the eastern shoreline	Requires EIA DS from ERA	Not yet due	-	-
3.1 Construction of multipurpose facility at HAC	Screening decision from ERA to finalize level of assessment	Obtained on 18 September 2025	18 September 2026	Decision Statement: EIA required
	Dewatering permit	Not yet due	-	-
	EIA Approval by ERA	Ongoing. Approved ToR issued by ERA on 26 February 2026. EIA due on 26 August 2026.		Announcement for hire of local EIA consultant done, hiring process ongoing.
4.1 Matching grant scheme to support	Depends on type of innovation; if only soft components involved then no screening is	Not yet due	-	Matching grants program details are being finalized. Based on the final program, a

adaptation innovations	needed; for others, level of assessment to be finalized following screening			screening checklist will be created to screen applications.
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B. Compliance with Government Clearance Conditions

18. A Project IEE already exists with an Environmental Management Plan that will be adhered to. In addition, if any of the statutory clearances or permissions specify any conditions that are required to be complied with or monitored during implementation and operation, the requirements will be complied. Following Table 5 presents the details and status of compliance. Although at this stage, no clearances have been applied for.

Table 5 Conditions of Statutory Clearances

Package/ Subproject	Clearance/ Permissions Received	Conditions of Clearance / Permissions	Status of Compliance
1.1 Addu weather radar system including tower	-	-	-
1.2 Male' radar upgrades	-	-	-
2.1 Inland drainage network improvements, including bioswale	-	-	-
2.2 Measures of the protection of the eastern shoreline	-	-	-
3.1 Construction of multipurpose facility at HAC	-	-	-
4.1 Matching grant scheme to support adaptation innovations	-	-	-

(list all conditions specified in respective clearance/permission)

Present status of compliance in – compiled/ being compiled/ to be compiled)

V. Compliance with Loan Covenants

A. Loan Covenants

19. Status of compliance with environmental safeguard related loan covenants is given in Table 6. The Project is being implemented in compliance with all the covenants.

Table 6 Status of Compliance with Loan Covenants

Schedule No	Covenant	Status of Compliance	Action Required
Schedule 4 Conditions for Award of Contracts	Paragraph 3 Subject to paragraph 4 below, the Borrower shall not, or ensure that the Project Executing Agency and the Implementing Agencies do not, award any Works or Nonconsulting Services contract which involves environmental impacts until the Project Executing Agency or the Implementing Agencies have: a) Obtained the final approval of the IEE from the EPA; and b) Incorporated the relevant provisions from the EMP into the Works contract	In progress – not yet due	Submit EIA for HAC and an EMP for Addu Radar Construction to ERA via an independent EIA Consultant in Q1 and Q2 2026.
Schedule 4 Conditions for Award of Contracts	Paragraph 4 The Borrower or the Project Executing Agency and Implementing Agencies (as applicable) may award a Works or Nonconsulting Services contract involving environmental impacts with the respective IEE based on preliminary design having been submitted to and cleared by ADB is the contract: a) Is of a “design and build” or “turnkey” type under which the design must be completed for the Works contract before the IEE is updated to reflect the final project design; and b) Expressly provides that no works shall commence until an IEE for the Works contract reflecting the final project design having been submitted to and cleared by ADB.	In progress – not yet due	Where EIA/EMP is required, the bidding documents provide guidance to bidders to include any potential conditions of clearance in their bid price. The EIA/EMP will be completed by the independent contractor prior to contract signing of contractors and all required conditions of clearance will be accounted for in the contract.
Schedule 4 Conditions for Award of Contracts	Paragraph 5 Subject to paragraph 6 below, the Borrower shall not, or ensure that the Project Executing Agency and Implementing Agencies do not, award any Works contract which involves involuntary resettlement impacts for a Subproject, until the Borrower has prepared and submitted to ADB the final RP for such Subproject based on the	Complied	No additional action required.

	Subproject's detailed design, and obtained ADB's clearance of such RP.		
Schedule 4 Conditions for Award of Contracts	Paragraph 6 The Borrower shall ensure or cause the Project Executing Agency and the Implementing Agencies to ensure that a Works or Nonconsulting Services Contract involving involuntary resettlement impacts may be awarded prior to the final RP having been submitted to and cleared by ADB if the contract: a) Is of a "design and build" or "turnkey" type under which the design must be completed for the Works Services contract before the RP is finalized; and b) Expressly provides that the installation and construction phase (and commencement thereof) is conditional upon; (i) a final RP for the Works contract based on the Works contract's detailed design having been submitted to, and cleared by ADB; and (ii) the Borrower having notified ADB and the contractor in writing through the RP completion report that due consultation has been carried out, all required physical and/or economic displacement has been completed, compensation and other entitlements have been provided to affected people in accordance with the RP.	Not yet due.	No additional action required.
Schedule 4 Environment	Paragraph 7 The Borrower shall ensure or cause the Project Executing Agency and Implementing Agencies to ensure that the preparation, design, construction, implementation, operation and decommissioning of the Project and each Subproject comply with (a) all applicable laws and regulations of the Borrower relating to environment, health and safety; (b) the Environmental Safeguards; (c) the EARF; and (d) all measures and requirements set forth in the IEE and EMP, and any corrective or preventative actions set forth in a Safeguards Monitoring Report.	Ongoing compliance.	No additional action required.
Schedule 4 Land Acquisition and Involuntary Resettlement	Paragraph 8 The Borrower shall ensure or cause the Project Executing Agency and Implementing Agencies to ensure, that all land and all rights-of-way required for the Project and each Subproject are made available to the Works contractor in accordance with the schedule agreed	Ongoing compliance.	No additional action required.

	under the related Works contract and all land acquisition and resettlement activities are implemented in compliance with (a) all applicable laws and regulations of the Borrower relating to land acquisition and involuntary resettlement; (b) the Involuntary Resettlement Safeguards; (c) the RF; and (d) all measures and requirements set forth in the respective RP, and any corrective or preventative actions set forth in the Safeguards Monitoring Report.		
Schedule 4 Land Acquisition and Involuntary Resettlement	Paragraph 9 Without limiting the application of the Involuntary Resettlement Safeguards, the RF or the RP, the Borrower shall ensure or cause the Project Executing Agency and Implementing Agencies to ensure, that no physical or economic displacement takes place in connection with the Subprojects until: a) Compensation and other entitlements have been provided to affected people in accordance with the RP; and b) A comprehensive income and livelihood restoration program has been established in accordance with the RP	Ongoing compliance.	No additional action required.
Schedule 4 Indigenous Peoples	Paragraph 10 The Borrower shall ensure or cause the Project Executing Agency and Implementing Agencies to ensure that the Project or any Subprojects do not have any indigenous peoples impacts. In the unforeseen event that the Project or any Subprojects have any such impacts, the Borrower shall take all steps required to ensure that the Project complies with the applicable laws and regulations of the Borrower and with ADB' Safeguard Policy Statement.	Ongoing compliance.	No additional action required.
Schedule 4 Human and Financial Resources to Implement Safeguards Requirements	Paragraph 11 The Borrower shall make available or cause the Project Executing Agency and Implementing Agencies to make available necessary budgetary and human resources to fully implement the EMP and the RP.	Ongoing compliance	No additional action required.
Schedule 4 Safeguards – Related Provisions in Bidding	Paragraph 12 The Borrower shall ensure or cause the Project Executing Agency and Implementing Agencies to ensure, that all bidding documents and contracts for Works	Ongoing compliance.	No additional action required.

Documents and Works Contracts	<p>contain provisions that require contractors to:</p> <ul style="list-style-type: none"> a) Comply with the measures relevant to the contractor set forth in the IEE, the EMP, and the RP (to the extent they concern impacts on affected people during construction), and any corrective or preventative actions set forth in a Safeguards Monitoring Report; b) Make available a budget for all such environmental and social measures; c) Provide the Borrower with a written notice of any unanticipated environmental, resettlement or indigenous peoples risks or impacts that arise during construction, implementation or operation of the Project that were not considered in the IEE, the EMP and the RP; d) Adequately record the condition of roads, agricultural land and other infrastructure prior to starting to transport materials and construction; and e) Reinstate pathways, other local infrastructure, and agricultural land to at least their pre-project condition upon the completion of construction. 		
<p>Schedule 4</p> <p>Safeguards Monitoring and Reporting</p>	<p>Paragraph 13</p> <p>The Borrower shall do the following or cause the Project Executing Agency and Implementing Agencies to do the following:</p> <ul style="list-style-type: none"> a) submit semiannual environmental and social Safeguards Monitoring Reports to ADB and disclose relevant information from such reports to affected persons promptly upon submission; b) if any unanticipated environmental and/or social risks and impacts arise during construction, implementation or operation of the Project that were not considered in the IEE, the EMP or the RP, promptly inform ADB of the occurrence of such risks or impacts, with detailed description of the event and proposed corrective action plan; and c) report any actual or potential breach of compliance with the measures and requirements set forth in the approved IEE, EMP or the RP promptly after becoming aware of the breach. 	<p>Complied with delay</p>	<p>First SEMR was submitted on 4 October 2025.</p> <p>Second SEMR due on 31 January 2026 also delayed.</p>

B. Preparation and Approval of Initial Environmental Examination

20. The project is classified as category B for environment per ADB Safeguards Policy Statement 2009 (SPS 2009).

21. Package-wise status of preparation, submission, and approval of IEE Reports are presented in the following Table 7 once they are prepared.

Table 7 Package-wise Status of IEEs

Package	Bid Type	Package Status	Draft IEE submitted to ADB	Draft IEE cleared by ADB	Updated IEE submitted to ADB	Updated IEE cleared by ADB	Remarks
G01 Design, Supply and Installation of Radar System - including civil works for radar tower building, training and after-sale services	Design-Build	Bidding Process: Bid document sent to Tender Board for comments	Y	Y	Y	Y	Draft SEMR also updated as per ADB recommendations
CW02 Design-build upgrading of HAC Facilities	Design-Build	Bidding Process: Bid document sent for ADB approval by Tender Board	Y	Y	Y	Y	Draft SEMR also updated as per ADB recommendations

*Status (Bidding process / preliminary design / detailed design / construction / operation)
For submission/approval status – indicate 'Yes/No', and if 'Yes', specify date as well.*

C. Status of Disclosure of Safeguard Documents

22. Status of disclosure of safeguard documents is presented in Table 8. The disclosed documents are available on ADB and Project/PMU websites.

- (i) <https://www.adb.org/projects/57002-001/main>
- (ii) <https://www.environment.gov.mv/v2/en/project/33587>

Table 8 Status of Disclosure of IEEs

Package Number	Draft Disclosed on ADB website	Draft Disclosed on Project website	Updated/Final Disclosed on ADB website	Updated/Final Disclosed on Project website
Overall IEE	Yes	Yes	August 2024	August 2024

Indicate in terms of 'Yes/No'

D. Safeguards in Bid Documents and Contracts

23. Safeguard provisions will be duly included in bid documents and contracts once each package reaches procurement stage in the format shown in Table 9, with package-wise details.

24. Currently, the following two packages are being compiled for bidding in the next reporting period.

Table 9 Safeguards Provisions in Bid Documents and Contracts

Package Number	Type of Bid/Contracts	Bid/Contract Clauses related to environment, health and safety; labour standards	IEE/EMP included in Bid/contract
G01 Design, Supply and Installation of Radar System - including civil works for radar tower building, training and after-sale services	Design-Build	Incorporated, approved by ADB team	Yes
CW02 Design-build upgrading of HAC Facilities	Design-Build	Incorporated, approved by ADB team	Yes

VI. Grievance Redress Mechanism

A. GRM Establishment

25. The Project GRM was established during this reporting period through formal communication with participating islands and designation of island-level focal points. The GRM process document has been translated into Dhivehi and incorporated into project documentation and bidding documents. Information boards and grievance submission procedures will be displayed at project sites once civil works commence. While the mechanism was not operationalized in practice due to the absence of civil works and limited on-site activities, the institutional arrangements are in place. The GRM will be operationalized, disclosed, and actively monitored as project activities progress.

26. The GRM is established to receive, evaluate, and facilitate the resolution of affected persons concerns, complaints, and grievances about the social and environmental performance at the level of the project. The GRM will aim to provide a time-bound and transparent mechanism to voice and resolve social and environmental concerns linked to the project. Procedures and arrangements will be detailed in the RF. As agreed by ADB and the borrower, the environmental management plan and resettlement plan (as may be applicable) will be updated from time to time during project implementation, upon availability of detailed engineering design, and to reflect adaptive management of project changes and unforeseen circumstances or in response to project performance, ensuring that standards originally planned are not lowered.

27. During the ADB mission conducted from 21 to 25 September 2025, the structure of the proposed GRM tiers was reviewed and revised to better reflect implementation arrangements, clarify roles and responsibilities, and ensure effective escalation pathways. The revised GRM retains a three-tier structure consisting of: (i) Tier 1 – Contractor Level during construction where applicable, (ii) Tier 2 – Subproject-level Grievance Redress Committee (GRC), and (iii) Tier 3 – the Project Management Unit (PMU) Safeguards Team at the Ministry of Tourism and Environment. The mechanism is illustrated in Figure 3.

Figure 3 Flowchart of GRM

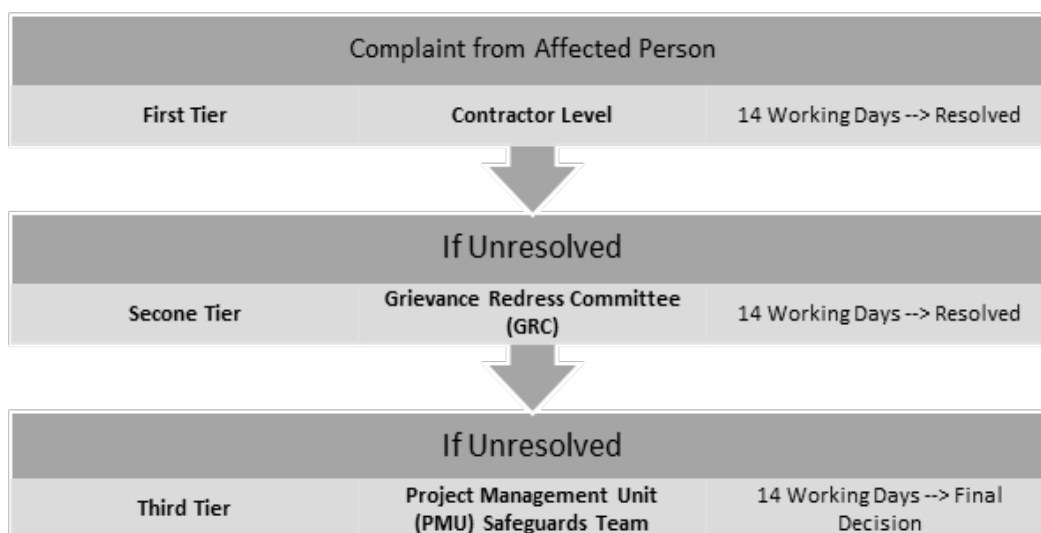


Table 10 GRM Operationalization Status

Subproject	Subproject level GRM notified	GRM responsibilities assigned	GRM operational to receive, register & redress complaints	Date of GRC formation
Output 1.1	Second Tier notified	Yes – Tier 2 and Tier 3	No, bid has not been awarded yet to any contractor	8 December 2025
Output 2	Second Tier Notified	Yes – Tier 2 and Tier 3	No, bid has not been awarded yet to any contractor	5 November 2025

B. Information to Stakeholders about GRM in the Project

28. The following information sessions were organized for stakeholders regarding GRM for this reporting period.

Table 11 Stakeholder Information Sessions Regarding GRM

Date	Stakeholder	Male	Female	Total Participants
5 November 2025	Kulhudhuffushi City Council	2	6	8
8 December 2025	Addu International Airport (AIA) and Maldives Meteorological Service (MMS), Addu	8	4	12

29. During these meetings, the PMU introduced the GRM and shared detailed information with stakeholders on the purpose and scope of the GRM, how the GRM will be organized and implemented under the project, the GRM structure and tiers, and the GRM process, including grievance intake, registration, review, resolution, escalation, closure, and the use of standard GRM forms and documentation. The discussions also covered stakeholder roles and responsibilities at each tier and the importance of timely documentation and reporting of grievances throughout the project lifecycle.

C. Status of Grievances

30. No grievances were received for this reporting period.

VII. Status of EMP Implementation

A. Findings on EMP Compliance

31. The Project is at pre-tendering stage. Compliance with design and pre-construction stage EMP measures will be ensured and reported in subsequent SEMRs.
32. At this stage, bidding documents are being prepared for
 - (i) G01: Design, Supply and Installation of Radar System – including civil works for radar tower building, training and after-sale services
 - (ii) CW02: Design-build upgrading of HAC facilities

The EMP has been integrated into these bidding documents, approved by ADB and are with the Ministry of Finance for tendering.

VIII. Environmental Monitoring

A. Environmental Quality Monitoring

33. The Project is at pre-tendering stage. No contract has been awarded. Baseline environmental quality monitoring will be conducted before start of civil works.

34. Project-specific environmental monitoring metrics are currently being developed and will be disseminated to guide and orient project staff.

IX. Stakeholder Consultation and Training

A. Communication and Consultation

35. The following consultations relating to environmental safeguards took place within the reporting period as presented in Table 12.

Table 12 Consultation with key stakeholders

No.	Agency	Date	Officials met	Issues discussed
1	Civil Aviation Authority	21 August 2025	Minvaal Ibrahim , Hassan Saamah	A brief overview of the project and Output 1.1 was provided. The discussion focused on the proposed radar installation location in Gan Addu in relation to seaplane runway operations. Aviation safety considerations and site suitability were discussed.
2	Maldives Meteorological Services	28 August 2025	Ahmed Rasheed (MMS Director Meteorology, Public Weather Service); Abdullah Waheed (MMS); Ahmed Muslim (MMS Addu – joined online); Ibrahim Mimrah (State Minister); Ali Shareef (Special Envoy)	Project overview and discussion on finalizing the installation site, considering operational needs, aviation safety, and required approvals. A joint site survey and demarcation with MMS officials was agreed.
3	LAMER & FENAKA	10 September 2025	Mohamed Siraj - Power Distribution Department, Deputy Director (MWSC); Mohamed Ivan - Power Distribution Department, Electrical Engineer (MWSC); Dr. Emma (LaMer); Shahaama (LaMer)	The meeting included a briefing on the project and an overview of the coastal modeling and detailed design study. Discussions focused on existing and planned electricity infrastructure in Kulhudhuffushi, including substations, power distribution networks, and ongoing upgrades under other projects. Participants also discussed the location of utility infrastructure, availability of electrical network drawings, and the need to share relevant data to support the coastal modeling study.
4	LAMER	11 September 2025	Dr. Emma Rendel (LAMER); Hussain Zahir (LAMER); Mohamed Ghalib (LAMER)	The LAMER team shared preliminary observations from their fact-finding mission and highlighted key risks related to land use changes, road development near the coastal ridge, and waste disposal practices that may influence shoreline conditions. Participants also discussed the need for improved data sharing among agencies to support modeling and design work.
5	LAMER & RDC	11 September 2025	Mohamed Shahud, Engineer; Ali Mushfig Nizam, Civil Engineer; Munah Ahmed, Assistant General Manager; Dr. Emma (LaMer); Shahaama (LaMer)	Fact-finding mission: meeting with key stakeholders regarding the coastal area engineering and design work in Kulhudufushi
6	LAMER & WAMCO	11 September 2025	Shathif Ali, General Manager Nothern Operation Lh-HA; Hussain Ibrahim Fulhu, General Manager /	The discussion focused on current waste management practices and challenges in Kulhudhuffushi, particularly the accumulation and disposal of construction and demolition waste along the coastal area. Participants

			Male' Operations - North Central; Dr. Emma (LaMer); Shahaama (LaMer)	discussed existing operational constraints, limitations in transferring waste to regional facilities, and potential future plans for waste management infrastructure. The implications of waste dumping for coastal conditions and the study area were also highlighted.
7	GWP Consultants and Water Solutions	15 September 2025	Wayne Bannister (GWP); Ahmed Jameel (WS); Clive Carpenter (GWP); Akif (WS)	The meeting introduced the mangrove ecologist supporting the study and provided an overview of the ongoing drainage and flood risk assessment work in Kulhudhuffushi. Discussions covered data collection activities, including surveys, groundwater monitoring, and analysis of the island's drainage system. Participants also discussed the potential role of mangroves in drainage management, existing gaps in understanding the drainage network, and the need for further surveys and data to support the study.
8	GWP Consultants, Water Solutions, and Biodiversity Section of MOTE	15 September 2025	Wayne Bannister (GWP); Ahmed Jameel (WS); Clive Carpenter (GWP); Akif (WS)	Discussion focused on the upcoming field mission to Kulhudhuffushi for mangrove studies. Consulted the biodiversity and protected area sections to identify any existing studies, key considerations, or data needs that should be incorporated into the work. The Ministry indicated that there were no specific requirements or additional information to provide at this stage.
9	MAAW	29 September 2025	Hussain Faisal, Director General; Fathimath Afnaan Abdul Hameed, Director; Mohamed Rihvaan, Assistant Director; Mariyam Simla, Director	The meeting focused on coordination with the Ministry of Agriculture and Animal Welfare regarding activities under Output 3.2. Discussions covered the proposed school garden program, vocational training through the Hanimaadhoo Agricultural Centre, internship opportunities to support HAC activities, the role of the Urban Agriculture Consultant, regional workshops, and the establishment of urban agriculture demonstration plots. Participants also discussed strengthening school ownership of garden activities and identifying suitable locations for piloting project initiatives.
10	KCC	7 October 2025	Mohamed Athif, Mayor; Ahmed Abdulla, Councilor; Ibrahim Ahmed, Councilor; Athifa Ali, Councilor; Aishath Afa Ali, Senior Council Officer; Azheen Mohamed, Council Officer	The meeting focused on ongoing activities along the eastern shoreline and their potential implications for the coastal modeling and design study. The PMU shared observations from the fact-finding mission, noting that reclamation and waste disposal activities in the area could affect monitoring data and the accuracy of modeling results. The Council explained that construction and demolition waste had been placed in the area as part of earlier shoreline protection efforts. The PMU recommended temporarily halting ongoing activities during the study period to maintain data integrity, while the Council agreed to review the matter internally and explore alternative waste management options.
11	GWP Consultants, Water Solutions, MOTE Water Department	8 October 2025	Clive Carpenter, GWP Consultants; AJ, Water Solutions; Afsal Hussain, MOTE, Water Dept Director	The meeting discussed the proposed groundwater monitoring boreholes in Kulhudhuffushi as part of the hydrological and coastal study. Participants reviewed technical requirements for groundwater monitoring, challenges in locating existing monitoring wells, and the need for updated data to support modeling of groundwater and

				mangrove interactions. Alternative monitoring approaches and technical considerations, including equipment availability, cost implications, and regulatory requirements, were also discussed.
12	Kulhudhuffushi City Council	5 November 2025	Azheen Mohamed, Aishath Afa Ali, Rilwan Mohamed, Athifa Ali, Sofoora Hussain	GRM structure, tiers, grievance submission procedures, and escalation pathways were introduced and discussed in relation to Output 2 activities. The roles and responsibilities of the Island-level Grievance Redress Committee (GRC) were clarified, and council representatives were informed of documentation and reporting procedures
13	MMS	3 December 2025	Ahmed Rasheed, Director; Abdulla Wahid, Director General; Ali Shareef, Deputy Director General; Ahmed Zalif; Thameem Abdul Razzaq, Senior Met Technician; Ibrahim Mimraah, State Minister MoTE	The meeting discussed the scope and technical requirements for the weather radar systems in Malé and Addu. MMS noted that the Malé radar may require replacement rather than refurbishment and highlighted the need for a new server to host radar data. For the Addu radar, participants agreed to proceed according to the bidding documents, with additional requirements related to data visualization to be considered.
14	Addu International Airport (AIA) and Maldives Meteorological Service (MMS) in Addu	8 December 2025	Mohamed Waheed Hussain, Hussain Rasheed, Ibrahim Amjad, Mohamed Nishan, Rimna Hassan, Khadheeja Shahidha, Ali Shareef, Thameem Abdul Razzaq, Ahmed Nazeer	The meeting discussed the demarcation of land for the proposed weather radar and MMS office at Addu International Airport under Output 1.1. Participants reviewed land allocation arrangements, technical considerations for the radar and office site, and coordination required for the demarcation process. The PMU also introduced the project's Grievance Redress Mechanism (GRM) and discussed relevant stakeholders to be included in the process.
15	GWP Consultants and Water Solutions	11 December 2025	Wayne Banister, Warren Akif	Presentation and discussion of field mission findings for the Kulhudhuffushi mangrove and groundwater study, including monitoring activities, borehole site assessments, and next steps for hydrological and ecological modelling.

Table 13 Community consultations

No.	Name of Island	Organization/Stakeholder	Date	Male	Female
-	-	-	-	-	-

B. Capacity Building Activities

36. No capacity building activities were conducted for external stakeholders during this reporting period. However, the PMU participated in training activities as detailed in Table 2.

X. Findings, Key Issues and Remedial Measures

A. Status of Compliance to Action Plan in Last Aide Memoire

37. The last Aide Memoire was shared after the inception mission 28th April 2025 to 5th May 2025. Table 14 details the actions pertinent to environmental safeguarding issues and includes updates on actions.

Table 14 Status of Compliance to Actions from Last Aide Memoire

No.	Actions	By Who	By When	Updates/Remarks
3	Hiring of Project Manager	MOTE	by 19-Jun-2025	Completed
6	Advertisement and hiring of other PMU staff <ul style="list-style-type: none"> - Civil/Environmental Engineer - Finance Management Specialist - Environmental Safeguards Specialist - Social Safeguards - Gender Expert - Communication/behavioral change specialist - Secretary and Office assistant 	MOTE	by 19-Jun-2025	Completed, except for Civil/ Environmental Engineer and Secretary and Office assistant
14	Advertisement and hiring of Project Implementation Consultants <ul style="list-style-type: none"> - Weather Observatory Specialist - Coastal /Environmental Engineer - Conservation Specialist (Mangrove Ecologist) 	MOTE	30-May-2025 to 30-Jun-2025	Delayed
23	Establish the Grievance Redress Mechanism (GRM)	MOTE	By 30 June (contingent to PMU establishment)	Established.

B. Status of Compliance to Action Plan Recommended in the Last SEMR

38. This is the second SEMR prepared for the Project, and the action plan items from the first SEMR for compliance review are presented below with updates.

Table 15 Status of Compliance to SEMR Action Items

Issue/Concern	Proposed Remedial Measure	Responsible Party	Target Date	Updates/Remarks
The following positions at PMU level are still vacant <ul style="list-style-type: none"> • Project Manager • Environmental Safeguards Specialist • Social Safeguards Specialist 	Recruit the personnel and establish PMU	MOTE	August 2025	Completed.
GRM is not established	Establish GRM through the PMU	PMU	October 2025	Partially completed. A project-level GRM framework has been established and introduced to key stakeholders, and focal points have been identified. However, the mechanism is not yet fully operational or publicly disclosed and will continue to be

				operationalized as project activities progress.
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C. Findings and Key Issues

39. Findings of this SEMR are presented in the following table along with key issues and remedial measures.

Table 16 Summary of Safeguard Findings, Issues, and Remedial Measures

Monitoring Aspect	Findings & Key Issues	Remedial Measures
Availability of safeguards personnel (PMU, PIU, Consultants and Contractors)	Key safeguards positions within the PMU have been filled, including Environmental Safeguards Specialist, Social Safeguards Specialist, and Gender Specialist. However, the Civil or Environmental Engineer position remains vacant and will be critical once civil works commence in 2026. In addition, PIU personnel have not yet been mobilized. Ongoing studies and design activities for Kulhudhuffushi, as well as radar subprojects, require dedicated technical input. PIU staff will also be necessary to support preparation of bidding documents and oversee implementation as the project advances in 2026.	<ol style="list-style-type: none"> 1. Recruit Civil or Environmental Engineer at the earliest opportunity. 2. Mobilize PIU personnel to support design finalization, bid preparation, and implementation oversight.
Compliance with statutory requirements (clearance/permissions etc)	Being complied/not yet due	-
Compliance with ADB loan covenants	Being complied	-
Compliance with preparation, approval, disclosure of draft IEEs	Complied	-
Compliance with preparation, approval, disclosure of updated/final IEEs	Not yet due	-
Contractor compliance with preconstruction requirements	Not yet due No contracts have been awarded yet	-
EMP implementation, monitoring, reporting	Will be complied, not yet due.	-
Training and capacity building activities	Being complied.	-
Public consultation	Will be complied.	-
Establish the Grievance Redress Mechanism (GRM), and ongoing compliance.	A project level GRM framework has been established, and focal points have been identified. However, the mechanism is not yet fully operational in practice. While design activities and field level engagements are underway, the GRM has not been actively implemented, publicized, or tested at subproject level. An operational GRM should be in place even during the design phase to receive and manage feedback, concerns, or complaints.	<ol style="list-style-type: none"> 1. Compile and disclose a project-wide GRM document outlining grievance submission channels, contact points, and response procedures. 2. Ensure the GRM is operational and accessible during all project phases, including ongoing design studies, field surveys, and stakeholder consultations. 3. Publicize GRM contact information across relevant islands, agencies, and project sites to enable

	stakeholders to submit concerns or feedback.
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D. Follow-up Corrective Action Plan

40. The following action plan is developed to address the issues of concerns raised in this report.

Table 17 Corrective Action Plan for Identified Safeguard Issues

Issue/Concern	Proposed Remedial Measure	Responsible Party	Target Date
Vacancy of Civil/Environmental Engineer position within PMU and delayed mobilization of PIU personnel to support technical oversight.	Recruit Civil or Environmental Engineer and mobilize PIU personnel to support design finalization, bidding document preparation, and implementation oversight.	PMU (Ministry of Tourism and Environment)	Q1 2026
GRM established but not yet fully operational or publicly accessible during design and study phases.	Compile and disclose a project-wide GRM document, operationalize grievance intake channels during all project phases, and publicize GRM contact information at relevant islands and project sites.	PMU Safeguards Team	Q1 2026

XI. Conclusion

41. This SEMR#2, covering July to December 2025, has been prepared in line with the ADB Safeguard Policy Statement 2009 requirements. During this reporting period, the Project remained largely in the preparatory phase, with progress focused on staffing, technical studies, stakeholder engagement, and integration of safeguard requirements into project planning and bidding documents. Key institutional arrangements, including the PMU and the project-level GRM, have been established; however, some elements such as full GRM operationalization and remaining staffing positions are still being finalized. Compliance with loan covenants and safeguard provisions has been maintained, and corrective actions have been identified to address outstanding gaps. Overall, the Project remains on track, and safeguards implementation is expected to strengthen further as civil works and operational activities commence in the upcoming reporting periods.

ANNEX 1 PHOTOGRAPHS



On field safeguards training ongoing in Laamu Atoll



Mangrove study being conducted in HDh Kulhudhuffushi by GWP x WS



Gender Orientation Workshop



Addu Radar Site Demarcation Works and Stakeholder Consultation



Project Steering Committee Meeting