

Social Monitoring Report

Project Number: 57002-001
Loan Number: Loan 4531-MLD
Gant Number: 0988-MLD
Gant Number: 0989-MLD
Gant Number: 9244-MLD
TA Number(s): 10378-MLD

Semi-Annual Report (July 2025 – December 2025)
January 2026

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 Review Framework
EMP	-	Environmental Management Plan
GOM	-	Government of the Republic of Maldives
HDC	-	Housing Development Corporation
PMU	-	Project Management Unit
IA	-	Implementing Agency
MOCI	-	Ministry of Construction and Infrastructure
MOF	-	Ministry of Finance
MSFD	-	Ministry of Social and Family Development
FPA	-	Family Protection Agency
MBS	-	Maldives Bureau of Statistics
MOE	-	Ministry of Education
MCCEE	-	Ministry of Climate Change, Environment, and Energy
MOTE -		Ministry of Tourism and Environment (Previously known as (MCCEE))
RF	-	Resettlement Framework
WDC	-	Women's Development Committee

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Executive Summary

This Semi-Annual Social Monitoring Report (SMR) covers the period July to December 2025 for the Enhancing Climate Resilience and Food Security Project. It is the second SMR prepared since loan effectiveness in January 2025 and provides updates on project implementation, safeguards, and compliance with the Environmental Assessment and Review Framework (EARF), Resettlement Framework (RF) 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 across Maldives; 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 MOTE's Climate Change Department, will oversee day-to-day operations, and is operational as recruitment has taken place.

During this reporting period, the Project transitioned from early establishment to structured implementation readiness. The Project Management Unit (PMU), based within the Climate Change Department of the Ministry of Tourism and Environment (MOTE), became substantially operational during this period, with the mobilization of key staff including the Project Manager, Financial Management Specialist, Social Safeguards Specialist, Environmental Safeguards Specialist, Gender Expert, Procurement Specialist, and supporting administrative personnel.

Institutional governance mechanisms were strengthened during this period. The Project Steering Committee was formally convened on 29 December 2025, providing policy direction and strategic oversight to project implementation.

Procurement activities progressed under Outputs 1 and 3. Bid documents for the installation of the Addu radar system and the design-build package for the Hanimaadhoo Agriculture Center (HAC) multipurpose facility were finalized and advanced. Demarcation works for the Addu radar site were completed. IT equipment required for PMU operations was procured. Preparatory activities under Output 4 included the development of operational guidelines for the Matching Grant Scheme, with integration of gender-responsive provisions.

With regard to social safeguards, the Project remains classified as Category B for involuntary resettlement. No involuntary land acquisition, physical displacement, economic displacement, or access restrictions were identified during the reporting period. All proposed subprojects are located on government-owned land Three Due Diligence Reports (DDRs) remain valid for Outputs 1, 2, and 3.

The Grievance Redress Mechanism (GRM), which was under preparation in earlier reporting periods, was finalized and operationalized across some of the subprojects during Q4 2025. The mechanism has been structured as a three-tier system and introduced to relevant stakeholders.

A hands on fields social safeguard orientation as a capacity building activity was conducted within this period.

The Maldives does not meet the criteria for Indigenous Peoples as defined under ADB's Safeguard Policy Statement (2009). Therefore, the Project remains categorized as C for Indigenous Peoples.

Overall, during July–December 2025, the Project achieved substantial progress in strengthening safeguards systems, institutional arrangements, procurement readiness, and governance oversight, positioning the Project to transition into active implementation during 2026.

I. Introduction

A. About this Report

1. This is the Semi-annual Social Monitoring Report (SMR) 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 SMR since the loan effectiveness on 15 January 2025. This SMR provides an update on the Project's social safeguards performance, including the identification and management of social risks and impacts, implementation of mitigation measures, operation of the grievance redress mechanism, and compliance with applicable social safeguards requirements and loan covenants.

B. Project Description

2. The Project will support Maldives' efforts to reduce 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 and Social Categorization of the Project

4. The Project is classified as Category B under ADB's Safeguard Policy Statement (2009), for involuntary resettlement as the project will not involve any significant involuntary land acquisition or resettlement.

5. A resettlement Framework was prepared for the project and 3 major DDRs were prepared for output 1, 2 and 3.

6. There are no indigenous people as defined by ADB's Safeguards Policy Statement (SPS; 2009) in the Maldives. Therefore, the project is categorized as C for indigenous peoples.

D. Overall Project Progress Status

7. During the reporting period of July to December 2025, the Project advanced from the preparatory phase into structured implementation readiness.

8. The PMU became substantially operational during this period. Key staff positions were filled, enabling the establishment of internal reporting systems, coordination mechanisms, procurement oversight processes, and safeguards compliance monitoring arrangements.

9. Under Output 1, procurement processes for the installation of the Addu radar system were advanced. Demarcation works at the Addu radar site were completed during December 2025. Coordination with the Maldives Meteorological Service (MMS) was strengthened to finalize remaining technical scopes.

10. Under Output 2, technical assistance contracts for environmental and hydraulic modeling studies continued in mobilization. Stakeholder consultations were conducted with Kulhudhuffushi City Council in relation to flood mitigation design and environmental considerations.

11. Under Output 3, procurement activities for the HAC multipurpose facility were advanced. Bid documents for the design-build package were finalized. Supporting procurement for IT equipment and operational support items was completed. The Urban Farming Training Plan was finalized to guide subsequent capacity building activities.

12. Under Output 4, operational guidelines for the Matching Grant Scheme were drafted and reviewed. Preparatory coordination with SME Development Finance Corporation (SDFC) was undertaken.

13. No civil works commenced during this reporting period. Therefore, no social safeguard impacts were triggered.

II. Project Implementation Arrangements

A. Project Contracts and Management

15. The following table presents the project implementation arrangements.

Table 1 Project Implementation Organizations: Roles and Responsibilities

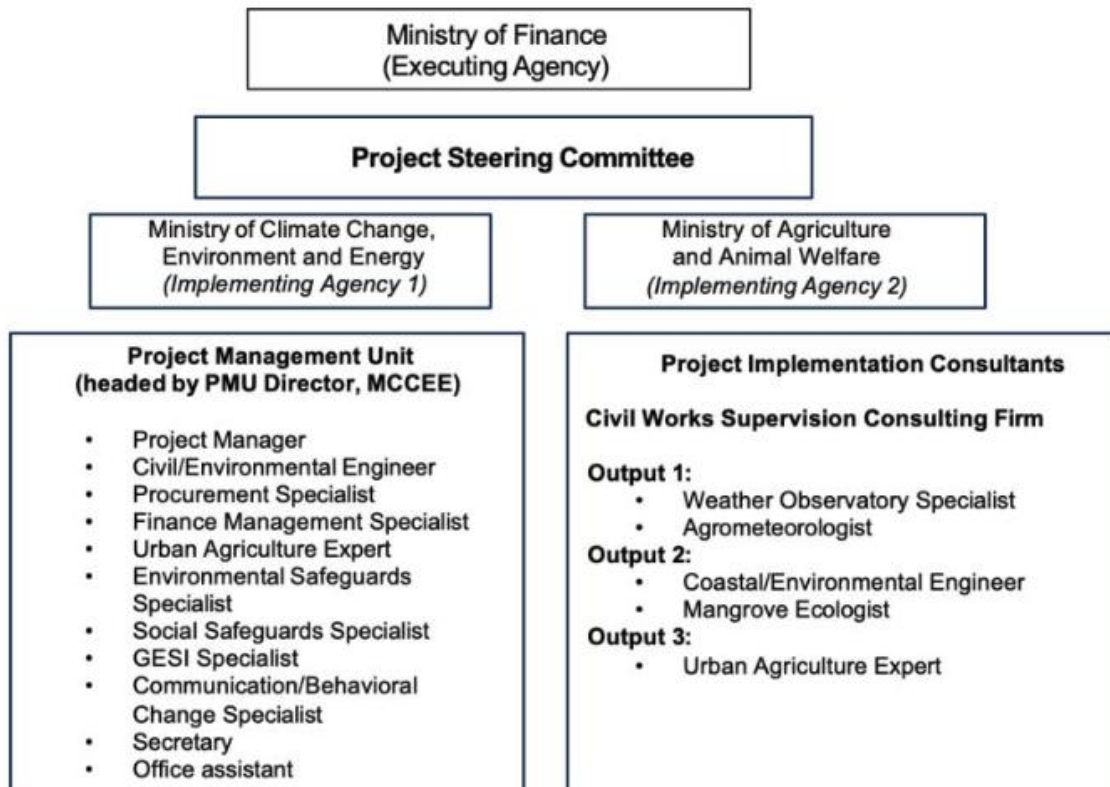
Project Implementation Organization	Management Roles and Responsibilities
Executing Agency: Ministry of Finance (MOF)	<ul style="list-style-type: none"> - Guide and monitor overall project execution, responsible for timely execution of the project - Provide financial oversight; ensure flow of funds to 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	<ul style="list-style-type: none"> - Responsible for overall project management, implementation and monitoring

<p>Based in MOTE's Climate Change Department (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>Maldives Meteorological Service</p>	<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
<p>Kulhudhuffushi City Council</p>	<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
<p>Grant Committee for Small Grants Scheme</p> <p>Established by PMU under MOTE Chair: TBD Members: TBD</p>	<ul style="list-style-type: none"> - Provide consultation for the waves of call for proposals for beneficiary categories - Review and approve grant applications
<p>SME Development Finance Corporation</p>	<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
<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 the likelihood of attaining the project's immediate development objective

	<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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B. Key Persons Involved in Safeguarding Implementation

Figure 1 Project Organizational Structure and Staffing



Project Management Unit

PMU hiring ongoing -

**Asian Development Bank
Implementation Team**

Deepak Bahadur Singh, Senior Environment Officer
 Jocelyn Mendoza, Social Development Officer (Safeguards)
 Puri Philina Gamon, Social Development Officer (Gender)

Contractors

No contracts with safeguards requirements awarded yet -

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

16. The Project Management Unit (PMU) became substantially operational during this reporting period, with the mobilization of key safeguard staff including the Environmental Safeguards Specialist and Social Safeguards Specialist.

17. During the ADB mission conducted from 21–25 September 2025, an orientation was delivered to the newly mobilized PMU staff, including the environmental and social safeguards specialists. The mission provided guidance on the application of ADB's Safeguard Policy Statement (2009), compliance monitoring requirements, integration of safeguards provisions into documentation, and reporting obligations under the Environmental Assessment and Review Framework (EARF) and Resettlement Framework (RF).

18. The mission also provided direction on grievance redress procedures, documentation requirements, and roles and responsibilities of safeguard staff during pre-construction and implementation phases.

19. While a standalone Occupational Health and Safety (OHS) training program has not yet been conducted during this reporting period, OHS requirements have been incorporated into bidding documents and draft contract provisions in preparation for the commencement of civil works.

20. Further structured safeguard and OHS capacity-building activities are planned for 2026 prior to the initiation of construction activities, according to the mission members.

III. Project Implementation Status

A. Project Activities During Current Reporting Period

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

Table 2 Project Implementation Activities in Current Period

Project Activity	Date
Announcement for PMU members: <ul style="list-style-type: none"> - Project Manager - Financial Management Specialist - Civil Engineer - Environmental Safeguards Specialist - Gender Expert - Social Safeguards Specialist - Communications and Behavior Change Specialist 	24 April 2025
ADB Inception mission	28 April – 5 May 2025
Contract Signing for Mangrove and Groundwater Hydrology Modeling and Detailed Design Study (ST1)	28 April 2025
Contract Signing for Marine and Coastal Modeling and Detailed Design Study (ST2)	3 June 2025
Local Procurement Specialist Engaged <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 	TBD
Mobilization of key PMU members including Project Manager, Financial Management Specialist, Environmental Safeguards Specialist, Gender Expert, and Social Safeguards Specialist	July–September 2025
ADB Mission including environmental and social safeguards orientation for PMU staff	September 2025
Completion of demarcation works for Addu Radar site (government land verification and site boundary confirmation)	December 2025
Finalization and operationalization of the Grievance Redress Mechanism (GRM), including translation into Dhivehi and establishment of three-tier structure	Q4 2025
Introduction of GRM during stakeholder coordination meetings	Q4 2025
Stakeholder consultations with Kulhudhuffushi City Council on flood mitigation and drainage management	Q3–Q4 2025
Stakeholder coordination meetings in Addu relating to radar installation and site demarcation	Q4 2025
Integration of safeguards clauses, Resettlement Framework provisions, labor standards, and GRM requirements into bidding documents and draft contracts	Q3–Q4 2025
First Project Steering Committee Meeting convened, including review of safeguards compliance status	29 December 2025

B. Description of any Changes to Project Design

22. No changes have been brought to the project design. The DDRs that were prepared within the project preparatory stage remains standing.

C. Description of any Changes to Agreed Construction Methods

23. The project is not at a construction phase and there have been no changes. The DDRs will be the leading document for social safeguards and DDRs will be updated accordingly once the construction begins.

IV. Compliance with Loan Covenants

A. Loan Covenants

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

Table 3 Status of Compliance with Loan Covenants

Schedule No	Covenant	Status of Compliance	Action Required
Schedule 4 Conditions for Award of Contracts	<p>Paragraph 3</p> <p>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 Non-consulting Services contract which involves environmental impacts until the Project Executing Agency or the Implementing Agencies have:</p> <p>a) Obtained the final approval of the IEE from the EPA; and b) Incorporated the relevant provisions from the EMP into the Works contract</p>	In progress – not yet due	<p>Complete EPA (now ERA) screening for HAC and Addu Radar construction.</p> <p>Incorporate screening outcome and relevant EMP provisions into bid documents before contract award.</p>
Schedule 4 Conditions for Award of Contracts	<p>Paragraph 4</p> <p>The Borrower or the Project Executing Agency and Implementing Agencies (as applicable) may award a Works or Non-consulting Services contract involving environmental impacts with the respective IEE based on preliminary design having been submitted to and cleared by ADB is the contract:</p> <p>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.</p>	In progress – not yet due	As above; if EIA is required, include a sample EIA TOR in the bidding documents to guide bidders.
Schedule 4 Conditions for Award of Contracts	<p>Paragraph 5</p> <p>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 Subproject's detailed design, and obtained ADB's clearance of such RP.</p>	Complied	No additional action required.

<p>Schedule 4</p> <p>Conditions for Award of Contracts</p>	<p>Paragraph 6</p> <p>The Borrower shall ensure or cause the Project Executing Agency and the Implementing Agencies to ensure that a Works or Non-consulting 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:</p> <p>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</p> <p>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.</p>	<p>Not yet due.</p>	<p>No additional action required.</p>
<p>Schedule 4</p> <p>Environment</p>	<p>Paragraph 7</p> <p>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.</p>	<p>Ongoing compliance.</p>	<p>No additional action required.</p>
<p>Schedule 4</p> <p>Land Acquisition and Involuntary Resettlement</p>	<p>Paragraph 8</p> <p>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 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</p>	<p>Ongoing compliance.</p>	<p>No additional action required.</p>

	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 Documents and Works Contracts	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 contain provisions that require contractors to: 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	Ongoing compliance.	No additional action required.

	<p>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;</p> <p>d) Adequately record the condition of roads, agricultural land and other infrastructure prior to starting to transport materials and construction; and</p> <p>e) Reinstate pathways, other local infrastructure, and agricultural land to at least their pre-project condition upon the completion of construction.</p>		
<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> <p>a) submit semiannual environmental and social Safeguards Monitoring Reports to ADB and disclose relevant information from such reports to affected persons promptly upon submission;</p> <p>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</p> <p>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>	<p>Complied with delay</p> <p>(as PMU was not yet mobilized)</p>	<p>Submit the first SMR by 10th October 2025.</p> <p>Ensure that moving forward all SMRs are submitted without delay.</p>

B. Status of Disclosure of Safeguard Documents

25. Status of disclosure of safeguard documents is presented in Table . The disclosed documents are available on ADB and Project/PMU websites. (<https://www.adb.org/projects/57002-001/main>)

Table 4 Status of Disclosure of RPs and DDRs

Package Number	Draft Disclosed on ADB website	Draft Disclosed on Project website	Updated/Final Disclosed on ADB website	Updated/Final Disclosed on Project website
RF	Yes	Yes	-	-
RPs	N/A	-		
DDR for Outputs 1, 2 and 3	No	Yes		

Updated DDR 1.1 and 3.1	No	No		

Indicate in terms of 'Yes/No'

C. Safeguards in Bid Documents and Contracts

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

27. Currently, the following two packages are being compiled and will be finalized during the next reporting period.

Table 5 Safeguards Provisions in Bid Documents and Contracts

Package Number	Type of Bid/Contracts	Bid/Contract Clauses related to environment, health and safety; labor 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	Yes
CW02 Design-build upgrading of HAC Facilities	Design-Build	Incorporated	Yes

**As applicable, RPs included.

V. Grievance Redress Mechanism

A. GRM Establishment

28. The Grievance Redress Mechanism (GRM) for the Project is established in accordance with the Environmental Assessment and Review Framework (EARF) and Resettlement Framework (RF). The GRM provides a simple, acceptable, transparent and effective mechanism to manage and resolve any social or environmental concerns that may arise during the pre-construction, construction and operation phases of the Project, including matters related to land use, environmental management, labor issues, access restrictions, livelihood impacts, and other related concerns.

29. During the ADB mission conducted from 21–25 September 2025, the structure of the proposed GRM tiers was reviewed and discussed in detail. Based on the mission discussions, it was instructed that the originally proposed tier arrangement be revised to better reflect implementation realities, clarify roles and responsibilities, and ensure effective escalation pathways.

30. Accordingly, the GRM tier structure was revised prior to formal introduction meetings with stakeholders. The updated structure retains a three-tier system, but clarifies the sequencing and composition of grievance handling levels in line with operational responsibilities.

31. The revised GRM operates through the following tiers:

- Tier 1: Contractor Level (where applicable during construction phase)
- Tier 2: Subproject-Level Grievance Redress Committee (GRC)
- Tier 3: Project Management Unit (PMU) Safeguards Team (Ministry of Tourism and Environment)

The mechanism is visualized in Figure 2.

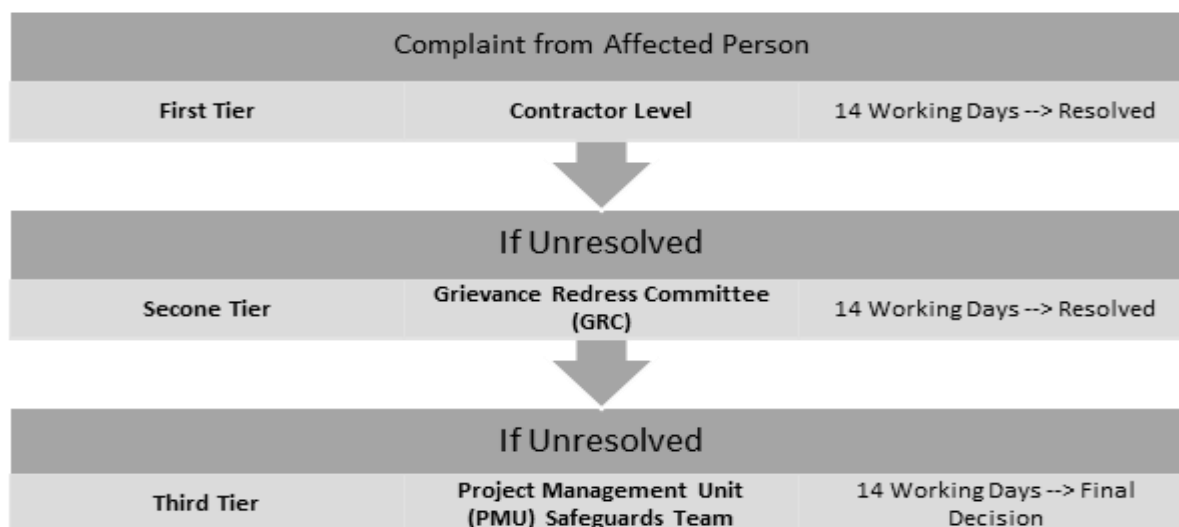


Figure 2 Flowchart of GRM

32. The revised structure was adopted prior to the introduction of the GRM to island and institutional stakeholders.
33. During this reporting period, formal introduction meetings on the GRM were conducted with:
 Kulhudhuffushi City Council (Output 2 – Flood and Coastal Protection Activities)
 Maldives Meteorological Service (MMS) in Addu (Output 1 – Radar Installation Activities)
 Addu International Airport Authority (Output 1 – Radar Site Demarcation at Gan)
34. For Output 2 activities in Kulhudhuffushi, the Island-level GRC arrangement was introduced and discussed, including representation from the City Council, Women’s Development Committee, local stakeholders, and the Project Safeguards Specialist.
35. For Output 1 activities at Addu International Airport (Gan), due to the industrial and managed nature of the island (rather than council-administered), the grievance handling arrangement was clarified to involve the contractor at Tier 1 and the relevant airport authority together with MMS at Tier 2, while retaining the PMU as Tier 3.
36. Both Output 1 and Output 2 GRM arrangements are functional and aligned with the revised project-wide GRM framework.
37. The GRM process document has been translated into Dhivehi and incorporated into project documentation, bidding documents, and reporting systems. Information boards and grievance submission procedures will be displayed at construction sites once civil works commence.
38. The GRM became operational during Q4 2025 and remains active.
39. The GRM will be 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.

Table 3 GRM Operationalization Status

Subproject	Subproject level GRM notified	GRM responsibilities assigned	GRM operational to receive, register & redress complaints	Date of GRC formation	Public informed of GRM
Output 2	YES	YES – At tier 2 and 3	Bid not awarded yet	23.12.2025	Bid not awarded yet

Output 1.1	YES	YES – At tier 2 and 3	Bid not awarded yet	25.12.2025	Bid not awarded yet

B. Information to Stakeholders about GRM in the Project

40. During the reporting period, information sessions on the Project's Grievance Redress Mechanism (GRM) were conducted as part of stakeholder coordination meetings under relevant outputs of the Project.

41. A meeting with Kulhudhuffushi City Council (KCC) was held on 5 November 2025, during which the 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.

42. A separate meeting with Addu International Airport (AIA) and Maldives Meteorological Service (MMS) in Addu was held on 8 December 2025 in relation to Output 1 radar installation and site demarcation activities. During this meeting, the GRM framework applicable to Output 1 was explained, including the revised tier structure, focal points, grievance submission channels, and coordination arrangements between the contractor, airport authority, MMS, and the PMU.

43. Stakeholders were informed that grievances may be submitted through written, electronic, or verbal means, and that the mechanism is accessible without cost and without retaliation. The availability of escalation to the PMU and to the national legal system was also clarified.

C. Status of Grievances

44. No grievances were received for this reporting period.

VI. Status of Implementation: Social Safeguards

A. Findings on Social Safeguards Compliance

45. The Project is currently at the pre-tendering stage. Compliance with social safeguards measures applicable to the design and pre-construction phase, as outlined in the Project's safeguards instruments (including the EARF, RF, and PAM), will be ensured and reported in subsequent Semi-annual Social Monitoring Reports (SMRs).

46. 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

Relevant social safeguards requirements, including provisions related to land use, labor standards, occupational health and safety, stakeholder engagement, and grievance redress, have been integrated into the bidding documents. These documents will be submitted for review and clearance by the Safeguards team prior to tendering.

47. During this reporting period, the Project maintained compliance with ADB's Safeguard Policy Statement (2009) for social safeguards.

48. Three Due Diligence Reports (DDRs) covering Outputs 1, 2, and 3 still remain standing.

49. Safeguards provisions, including compliance with the Resettlement Framework, labor standards, and grievance redress procedures, were incorporated into bidding documents and draft contracts.

50. No involuntary land acquisition, physical displacement, economic displacement, or restriction of access occurred during this reporting period.

51. The Project remains fully compliant with the Resettlement Framework.

B. Progress Report (IR and IP Safeguards)

Progress Report – IR and IP Safeguards

DDRs have been compiled for the outputs 1, 2 and 3 and the DDRs will be updated and/or confirmed once the construction works commence.

Key Question	Yes/No/Not Applicable	Remarks
I. Contracts. For any project outputs/component categorized as A or B for IR/IP		
1. Are there any works contracts that have been awarded by the borrower?	No	
2. Are the RP(s) based on final detailed-engineering design?	Not Applicable Yet	
3. Are the final RP(s) cleared by ADB?	Not Applicable Yet	

4. Are the IPP(s) based on final detailed- engineering design?	Not Applicable Yet .	
5. Are the final IPP(s) cleared by ADB?	Not Applicable Yet	
II. Project Execution: Instruments. For any project outputs/component categorized as A or B for IR		
1. Has access been granted to contractor(s) for the civil works site??	No	
2. Is there economic displacement?	Not Applicable Yet	
3. Is there physical displacement?	Not Applicable Yet	
4. Did physical displacement occur before compensations are fully paid to affected persons?	Not Applicable Yet	
5. Are other applicable assistance delivered to affected persons prior to providing access to the contractor?	Not Applicable Yet	
III. Project Execution: Grievances related to IR/IP		
1. Does the project have a functioning GRM?	No	
2. Are there any Accountability Mechanism (CRP)-eligible complaint(s) on file?	Not Applicable Yet	
3. If there is an AM complaint, is there a time-bound corrective action plan?	Not Applicable Yet	
4. Is the implementation of CAP on track?	Not Applicable Yet	
IV. Project Execution: Project Safeguards Non-Compliance Issues related to IR/IP		
1. Does the project have any outstanding non- compliances?*	No	
*aside from any non-compliance to items above		
2. If yes, is there a time-bound CAP agreed between ADB and Borrower?	Not Applicable Yet	
3. Is the implementation of corrective actions - a. on track? b. overdue for 3 months or less c. Overdue for more than 3 months	c	
V. Project Execution: Monitoring		
1. Are the social monitoring reports submitted as per agreed schedule, commencing from project effectiveness?	Complied with delay	Ensure that moving forward all SMRs are submitted without delay.
2. If no, for how long has it been overdue?	Complied with delay of 6 months	Ensure that moving forward all SMRs are submitted without delay.

VII. Social Safeguards Monitoring

A. Baseline Social Conditions

52. As the Project remains at the pre-tendering stage and no civil works contracts have been awarded, no project-induced social impacts have occurred to date. Baseline social conditions, where required, will be confirmed prior to the commencement of civil works, and monitoring of social safeguards compliance will begin during the construction phase in accordance with the approved safeguards instruments.

VIII. Stakeholder Consultation and Training

A. Communication and Consultation

53. No consultations relating to environmental and social safeguards took place within the reporting period. If any consultations took place, they are presented in the tables below.

Table 6 Consultation with key stakeholders

No.	Agency	Date	Officials met	Issues discussed
1	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.
2	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	In relation to Output 1 radar installation and site demarcation activities. During this meeting, the GRM framework applicable to Output 1 was explained, including the revised tier structure, focal points, grievance submission channels, and coordination arrangements between the contractor, airport authority, MMS, and the PMU.

Consultations did not raise any concerns related to land acquisition, displacement, or social exclusion.

Table 7 Community consultations

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

B. Capacity Building Activities

54. During this reporting period, environmental and social safeguards orientation was delivered during the ADB mission conducted in September 2025. The orientation supported newly mobilized PMU staff in understanding safeguards compliance, reporting requirements, and monitoring responsibilities.

55. Internal coordination mechanisms were strengthened to ensure integration of safeguards considerations into procurement and project planning processes.

IX. Findings, Key Issues and Remedial Measures

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

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

57. Key issues identified during the reporting period included:

- Initial delays in completion of PMU recruitment.
- Procurement evaluation timelines.
- Pending environmental clearances for certain subprojects.
- Low disbursement rates consistent with pre-construction stage.

These challenges were administrative and procedural in nature and did not result in social safeguards impacts.

Corrective measures implemented during this period included mobilization of key PMU staff, operationalization of the GRM, and strengthening of procurement oversight mechanisms.

Table 8 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	Hired
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	Hired except 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-202	Delayed
23	Establish the Grievance Redress Mechanism (GRM)	MOTE	By 30 June (contingent to	Established across some subprojects

			PMU establishment)	
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B. Status of Compliance to Action Plan Recommended in the Last SMR

58. During the previous reporting period, the positions of Project Manager, Environmental Safeguards Specialist, and Social Safeguards Specialist at the PMU level remained vacant, and the establishment of the PMU was pending. The recruitment of these personnel has since been completed during July–September 2025, and the PMU is now operational. Furthermore, the Grievance Redress Mechanism (GRM), which had not been established earlier, has been formally finalized and operationalized with regards to output 1.1 and output 2 during Q4 2025 through the PMU. Accordingly, the corrective actions relating to PMU establishment (targeted for August 2025) and GRM operationalization (targeted for October 2025) have been completed within the revised implementation timeline.

C. Findings and Key Issues

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

Table 9 Summary of Safeguard Findings, Issues, and Remedial Measures

Monitoring Aspect	Findings & Key Issues	Remedial Measures
Availability of safeguards personnel (PMU, PIU, Consultants and Contractors)	PMU is operationalized.	-
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 RPs and/or DDRs	Complied	-
Compliance with preparation, approval, disclosure of updated/final RPS and/or DDRS	Being complied	-
Contractor compliance with preconstruction requirements	Not yet due No contracts have been awarded yet	-
EMP and RP and/or confirmation of DDRs, implementation, monitoring, reporting	Being complied	-
Training and capacity building activities	Will be complied.	-
Public consultation	Will be held	-
Establish the Grievance Redress Mechanism (GRM),	GRM is now established across some subprojects.	-

D. Follow-up Corrective Action Plan

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

Table 4 Corrective Action Plan for Identified Safeguard Issues

Issue/Concern	Proposed Remedial Measure	Responsible Party	Target Date
-			
-			

Corrective actions identified in previous reporting periods relating to PMU recruitment and GRM establishment have been completed during this reporting period.

Future actions will focus on:

- Monitoring safeguards compliance during commencement of civil works.
- Continued stakeholder engagement.
- Regular documentation and monitoring of GRM operations.

X. Conclusion

61. During the period July–December 2025, the Project made substantial progress in strengthening institutional arrangements, governance mechanisms, procurement readiness, and safeguards operationalization. No social safeguards impacts were triggered during this reporting period. All activities remain within Category B parameters for involuntary resettlement. The Project remains Category C for Indigenous Peoples. The Project is compliant with ADB's Safeguard Policy Statement (2009), the Resettlement Framework, and applicable loan covenants. With key institutional and safeguards mechanisms now operational, the Project is positioned to transition into active implementation in 2026.