

Toward Risk-Aware and Climate-resilient communities (TRACT)

**Strengthening climate services and impact-based
multi-hazard early warning in Maldives**

Annex 12a

Environmental and Social Action Plan

Contents

1	OVERVIEW	2
2	PROJECT SUMMARY.....	2
3	RELEVANT POLICY AND REGULATORY REQUIREMENTS	3
3.1	Environmental and social policy framework in Maldives	3
3.2	GCF Revised Environmental and Social Policy	6
3.3	GCF Indigenous Peoples Policy.....	6
3.4	UNEP Environmental and Social Sustainability Framework	6
3.5	Gender policies.....	7
3.6	International and regional policies, strategies, conventions and treaties	7
4	SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (SEAH) RISK SCREENING	9
5	ANALYSIS OF PROJECT RISKS AGAINST IFC PERFORMANCE STANDARDS.....	16
6	ENVIRONMENTAL AND SOCIAL ACTION PLAN	25
7	GRIEVANCE REDRESS MECHANISM	32
7.1	Project-level Grievance Redress Mechanism	32
7.1.1	<i>Introduction</i>	<i>32</i>
7.1.2	<i>Scope and Function of the GRM</i>	<i>32</i>
7.1.3	<i>Governance Structure.....</i>	<i>34</i>
7.1.4	<i>Procedures for Filing and Resolving a Complaint</i>	<i>35</i>
7.1.5	<i>Special Cases: Gender-Based Violence (GBV) and Sexual Exploitation, Abuse and Harassment (SEAH).....</i>	<i>38</i>
7.1.6	<i>Receiving Complaints</i>	<i>38</i>
7.1.7	<i>Referral Pathways.....</i>	<i>38</i>
7.1.8	<i>Additional Considerations for the GRM</i>	<i>38</i>
7.1.9	<i>Grievance/Complaint Form</i>	<i>39</i>
7.1.10	<i>Monitoring and Evaluation</i>	<i>40</i>
7.1.11	<i>Communications related to the GRM.....</i>	<i>41</i>
7.2	UNEP Stakeholder Response Mechanism.....	42
7.3	GCF Independent Redress Mechanism	43
8	IMPLEMENTATION ARRANGEMENTS	45
9	MONITORING AND EVALUATION	47
10	INFORMATION DISCLOSURE, CONSULTATION AND PARTICIPATION	48
	APPENDIX 1 – IFC EXCLUSION LIST	49

1 OVERVIEW

The Environmental and Social Action Plan (ESAP) has been prepared in support of the Green Climate Fund (GCF) project proposal entitled “*Toward Risk-Aware and Climate-resilient communities (TRACT) – Strengthening climate services and impact-based multi-hazard early warning in Maldives*”, which has been developed by the United Nations Environment Programme (UNEP) at the request of the Ministry of Tourism and Environment of Maldives (MTE).

This report on the ESAP considers the environmental and social risks of the TRACT project identified during the screening process,¹ the risk significance, and measures to manage and address the identified risks. Additionally, this Annex provides information on policy and regulatory requirements applicable to the proposed project activities, analysis of the project against International Finance Corporation (IFC) performance standards, and screens for Sexual Exploitation, Abuse and Harassment (SEAH) risks. This Annex also sets out institutional and project-level grievance redress mechanisms, which describe the principles and processes for receiving, addressing, and tracking complaints of affected or potentially affected people and communities.

The overarching aim of the ESAP report is to highlight any environmental and social risks associated with the project, and to conceptualise an actionable plan to mitigate the identified risks and enhance the beneficial or positive impacts, ensuring inclusion of all stakeholders.

2 PROJECT SUMMARY

The TRACT project aims to strengthen climate resilience and reduce the vulnerability of climate-sensitive sectors and communities across Maldives. Rising temperatures, extreme rainfall, sea-level rise, and coastal flooding have all been identified as key climate-related hazards.² Extreme climate events are increasing in frequency and/or intensity due to climate change.³ Climate change is already adversely impacting on multiple sectors in Maldives (including agriculture, fisheries and tourism) putting lives and livelihoods at risk, and decreasing incomes, food and water security. Although the entire population of Maldives is at risk, the impacts of climate change are expected to be particularly acute for the poorest, most marginalised, and most remote communities, particularly women and children.⁴

The project aims to strengthen the capacity of the Maldivian population to implement preparedness and anticipatory actions based on reliable climate information and risk knowledge. This will be underpinned by the establishment of user-driven climate services and an end-to-end, people-centred, multi-hazard early warning system (MHEWS). The project is comprised of four key Outputs, which are aligned with the four main elements of effective MHEWS:

- 1) Strengthened delivery model and risk knowledge for climate services and a multi-hazard early warning system
- 2) Strengthened observations, monitoring, modelling and impact-based forecasting
- 3) Improved dissemination and communication of risk information and early warnings to the last mile
- 4) Enhanced climate risk management capacity using climate information and early warnings

¹ An initial environmental and social safeguards (ESS) screening was conducted as part of the development of the project concept note.

² The World Bank and Asian Development Bank, 2021. Climate Risk Country Profile: Maldives

³ IPCC, 2021. Climate Change 2021: The Physical Science Basis

⁴ The World Bank and Asian Development Bank, 2021. Climate Risk Country Profile: Maldives

3 RELEVANT POLICY AND REGULATORY REQUIREMENTS

The policies and regulations outlined in this section are applicable to the entire Environment and Social Action Plan. The section was compiled in consideration of national, UNEP, and GCF policies and requirements.

3.1 Environmental and social policy framework in Maldives

Maldives maintains a number of laws and regulations aimed at environmental protection, monitoring and for the management of environmental issues. The laws originate from the Constitution of the Republic of the Maldives (2008),⁵ which is the supreme law of Maldives and prevails over national legislation and international agreements.

Article 22 of Chapter II (Fundamental Rights and Freedoms) of the Constitution stipulates that “the State has a fundamental duty to protect and preserve the natural environment, biodiversity, resources and beauty of the country for the benefit of present and future generations”. It outlines how the State shall “undertake and promote desirable economic and social goals through ecologically balanced sustainable development and shall take measures necessary to foster conservation, prevent pollution, the extinction of any species and ecological degradation”.

Article 23 of the Constitution follows on to guarantee “every citizen the right to a healthy and ecologically balanced environment”; while Article 67 imposes a responsibility on every citizen to “preserve and protect the natural environment, biodiversity, resources and beauty of the country and to abstain from all forms of pollution and ecological degradation”

Central to environmental governance in Maldives is the Environment Protection and Preservation Act (EPPA),⁶ which declares the natural environment and its resources as a national heritage that need to be safeguarded for the benefit of future generations. The EPPA outlines protections for “land and water resources, flora and fauna as well as the beaches, reefs, lagoons and all natural habitats essential for sustainable development”.

In addition to the EPPA, Maldives has established several policies and regulations to ensure the safeguarding of the environment. These include the National Biodiversity Strategy and Action Plan (2016-2025),⁷ which aims to enhance biodiversity conservation through a number of guiding principles. Maldives’ Climate Change Policy Framework (2015-2025)⁸ acknowledges the status of Maldives as a nation suffering from the adverse impacts of climate change and outlines how it aims to build its capacity to ensure a “safe, sustainable, resilient and prosperous future”.

The Regulation on the Preparation of Environmental Impact Assessment Report (2012)⁹ mandates environmentally sound development practices. It requires an Environmental Impact Assessment (EIA) for any development work or project that falls within a detailed list of project types.¹⁰ The proposed project does not fall within those specified types. As such, it is deemed to be exempt from requiring an EIA.

A summary of other relevant environmental, social and industrial laws is provided in

⁵ The President’s Office, Republic of Maldives, 2008. Constitution of Maldives. Available at: <https://presidency.gov.mv/Pages/Index/15>. (Accessed: June 19, 2024).

⁶ UNEP Law and Environment Assistance Platform. Environmental Protection and Preservation Act of Maldives (Law No. 4/93) (1993). Available at: <https://leap.unep.org/en/countries/mv/national-legislation/environmental-protection-and-preservation-act-maldives-law-no-493>. (Accessed: June 19, 2024).

⁷ UNEP Law and Environment Assistance Platform, 2015. National Biodiversity Strategy and Action Plan (2016-2025). Available at: <https://leap.unep.org/en/countries/mv/national-legislation/national-biodiversity-strategy-and-action-plan-2016-2025>. (Accessed: June 19, 2024).

⁸ UNEP Law and Environment Assistance Platform, 2015. Climate Change Policy Framework (2015-2025). Available at: <https://leap.unep.org/en/countries/mv/national-legislation/climate-change-policy-framework-2015-2025>. (Accessed: June 19, 2024)

⁹ UNEP Law and Environment Assistance Platform, 2012. Regulation on the Preparation of Environmental Impact Assessment Report 2012 (No. 2012/R-27). Available at: <https://leap.unep.org/en/countries/mv/national-legislation/regulation-preparation-environmental-impact-assessment-report>. (Access: June 19, 2024).

¹⁰ The list of proposals requiring an Environmental Impact Assessment Study is provided as Schedule D to the Regulation.

Table 1.

Table 1. Laws, regulations and policies in Maldives relevant to the ESS screening

Law / Policy	Summary
Maldives National Framework for Management of Protected and Conserved Areas (2024-2029)¹¹	The Framework outlines management goals and priorities and provides overarching guidance to support the effective management of the network of Protected and Conserved Areas (PCAs) across Maldives, which in turns supports the protection and conservation of the key ecosystems of Maldives.
Magey Saafu Raajje National Waste and Resource Management Policy and Strategy (2024-2028)¹²	The Magey Saafu Raajje National Waste and Resource Management Policy and Strategy provides a framework for implementing a sustainable solid waste management system in Maldives. The Policy promotes a circular economy, encouraging the reuse and recycling of materials to minimise waste generation. Moreover, the Policy introduces Extended Producer Responsibility (EPR) mechanism, which establishes responsibilities at all levels of the production and consumption chain.
Climate Emergency Act (Act no. 9/2021)¹³	The Climate Emergency Act was passed by the Parliament of Maldives on 29 April 2021. The Act introduces the legal structure and guidelines for addressing issues and concerns related to climate change, including reporting, ensuring the sustainability of natural resources, overcoming negative impacts of climate change, and allocation of funds for renewable energy sources. ¹⁴
Natural Resources and Naturally Protected Species Regulations (No. R/25 of 2021)¹⁵	The Regulations aim to preserve and maintain the health of endangered species, their environments, and interconnected systems in a sustainable manner. The habitats of species protected under the Regulations are identified and use to inform the designation of protected areas. ¹⁶
Cultural Heritage Act (No. 12/2019)	The Cultural Heritage Act was established to safeguard the perpetuation of items and sites of historical significance to future generations and ensure the documentation, preservation and protection of Maldivian Cultural Heritage. ¹⁷
Protected Areas Regulation (No. 2018/R-78)¹⁸	The Protected Areas Regulation establishes guidelines for the declaration and management of protected areas through a consultative and transparent process. The Regulation states that entrance and exit from protected areas shall be in accordance with standards and permits set by the Environmental Protection Agency, under MTE.

¹¹ Maldives Ministry of Climate Change, Environment and Energy, 2024. Maldives National Framework for Management of Protected and Conserved Areas 2024-2029

¹² Maldives Ministry of Climate Change, Environment and Energy, 2024. Magey Saafu Raajje National Waste and Resource Management Policy and Strategy

¹³ Climate Laws, 2021. Climate Emergency Act (Act no. 9/2021). Available at: https://climate-laws.org/document/climate-emergency-act-act-no-9-2021_706a (Accessed: 21 June 2024).

¹⁴ The President's Office, Republic of Maldives, 2021. President ratifies Climate Emergency Act. Available at: <https://presidency.gov.mv/Press/Article/24678>. (Accessed: 21 June 2024).

¹⁵ UNEP Law and Environment Assistance Platform, 2021. The Natural Resources and Naturally Protected Species Regulations, no. R/25 of 2021. Available at: <https://leap.unep.org/en/countries/mv/national-legislation/natural-resources-and-naturally-protected-species-regulations-no>. (Accessed: 21 June 2024).

¹⁶ Maldives Ministry of Climate Change, Environment and Energy, 2024. Maldives National Framework for Management of Protected and Conserved Areas 2024-2029

¹⁷ The President's Office, Republic of Maldives, 2019. Press Release: 'Department of Heritage' renamed to 'National Center for Cultural Heritage'. Available at: <https://presidency.gov.mv/Press/Article/22233> (Accessed: 2 December 2024)

¹⁸ FAO, 2018. Protected Areas Regulation (No. 2018/R-78) (2018). Available at: <http://faolex.fao.org/docs/pdf/mdv195954.pdf>. (Accessed: 21 June 2024)

National Biodiversity Strategy and Action Plan (2016-2025)¹⁹	<p>The National Biodiversity Strategy and Action Plan 2016-2025 aims to ensure that threats to biodiversity are addressed, biodiversity is conserved and sustainably used, and benefits arising from biodiversity are shared equitably. The Plan sets out three guiding principles:</p> <ol style="list-style-type: none"> 1. The people of this generation and the generations to come reserve the right to access and share benefits of rich biodiversity and ecosystem services. 2. The responsibility of conserving and sustainably using biodiversity lies on everyone's shoulders and shall be taken as a shared responsibility. 3. Biodiversity shall be mainstreamed into all sectors and in a manner whereby monitoring progress and accountability is ensured.
Fisheries Law of the Maldives (No. 5/1987)²⁰	The Fisheries Law establishes the regulation and management of the country's fisheries sector to ensure sustainability and environmental protection. It includes provisions for licensing, monitoring, and enforcement to prevent overfishing, protect marine ecosystems, and promote responsible fishing practices. The Law also addresses issues such as conservation of endangered species, habitat preservation, and establishment of marine protected areas.
Heritage Act (No. 27/79)	The Heritage Act prohibits the destruction and vandalising of heritage sites and articles (with an exception to the exploration of such sites and articles for research purposes under a government permission). ²¹
Employment Act (No. 2/2008)²²	The Employment Act establishes rights and responsibilities of employers and employees in Maldives, including foreign workers. It covers a range of issues related to employment, such as recruitment, working hours, wages, termination procedures, and protection against discrimination.
Occupational Safety and Health Act (No. 09/2023)²³	The Act is a comprehensive legislation that sets the foundation for workplace health and safety in Maldives. It addresses key areas such as employer and employee responsibilities, risk assessment, and hazard prevention
Maldives Telecommunications Act (No. 43/2015)²⁴	The main objective of this Act is to facilitate the regulation and development of the telecommunications in Maldives. It outlines provisions for licensing, service quality, competition, and consumer rights. It also establishes rules for digital communication, cybersecurity, and access to information.
Maldivian Land Act (No. 1/2002)²⁵	The Land Act defines the legal framework for land ownership, allocation, and management in the Maldives, addressing issues related to land use, leases, and property rights. It ensures sustainable land development and equitable access to land resources while considering environmental and social impacts.
Disaster Management Act (28/2015)²⁶	The Act indicates the responsibility of the State to "protect its people, their health and well-being, their property, and the natural and built-up environment they live in from natural and man-made disasters, and hazards". It requires the State not only to respond to disasters, but also to

¹⁹ | UNEP Law and Environment Assistance Platform, 2015. National Biodiversity Strategy and Action Plan 2016-2025. Available at: <https://leap.unep.org/en/countries/mv/national-legislation/national-biodiversity-strategy-and-action-plan-2016-2025>. Accessed on: June 21, 2024).

²⁰ UNEP Law and Environment Assistance Platform, 1987. Fisheries Law of the Maldives (Law No. 5/87). Available at: <https://leap.unep.org/en/countries/mv/national-legislation/fisheries-law-maldives-law-no-587>. (Accessed: 21 June 2024).

²¹ UNEP Law and Environment Assistance Platform, 2016. Maldives Clean Environment Project Environmental and Social Assessment and Management Framework (ESAMF) and Resettlement Policy Framework (RPF). Available at: <https://leap.unep.org/en/countries/mv/national-legislation/maldives-clean-environment-project-environmental-and-social>. (Accessed: 21 June 2024)

²² Labour Relations Authority, 2008. Employment Act (Law No. 2/2008). Available at: <https://lra.gov.mv/wp-content/uploads/2019/08/Employment-Act.pdf> (Accessed: 24 March 2025)

²³ Available at: <https://gazette.gov.mv/gazette/6931> (Accessed: 24 March 2025)

²⁴ Communications Authority of Maldives, 2015. Maldives Telecommunications Act (Law No. 43/2015) Available at: https://www.cam.gov.mv/telecom_law2015.htm (Accessed: 24 March 2025)

²⁵ Available at: <https://old.mvlaw.gov.mv/pdf/translation/Land.pdf> (Accessed: 24 March 2025)

²⁶ National Disaster Management Authority, 2015. Disaster Management Act. Available at: <https://ndma.gov.mv/en/laws-and-regulation> (Accessed: 24 March 2025)

	mitigate risks, establish emergency response guidelines, ensure disaster preparedness, assist in disaster relief, and coordinate all related matters.
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3.2 GCF Revised Environmental and Social Policy

The GCF Environmental and Social Policy (2018)²⁷ articulates how the Fund should integrate environmental and social considerations into its decision-making and operations to effectively manage and safeguard environmental and social risks and impacts and improve outcomes. Revised in 2021, the updated Environmental and Social Policy²⁸ reaffirms the Fund's commitment to addressing Sexual Exploitation, Sexual Abuse, and Sexual Harassment in addition to environmental and social considerations in its funded activities.

3.3 GCF Indigenous Peoples Policy

The GCF Indigenous Peoples Policy (2018)²⁹ sets out the Fund's approach to incorporating the circumstances of indigenous peoples into decision-making while working towards climate change mitigation and adaptation. The overarching aim is to provide a structure for ensuring that activities of GCF are developed and implemented in such a way that fosters full respect, promotion, and safeguarding of indigenous peoples so that they (a) benefit from GCF activities and projects in a culturally appropriate manner; and (b) do not suffer harm or adverse effects from the design and implementation of GCF-financed activities.

3.4 UNEP Environmental and Social Sustainability Framework

UNEP's Environmental and Social Sustainability Framework (ESSF)³⁰ was approved in February 2020 and has an overall aim to strengthen the sustainability and accountability of UNEP programmes and projects. The ESSF underscores UNEP's commitment to sustainable development and environmental and social standards and is designed to promote human well-being and the protection of the environment. The framework has the following purposes:

- To enhance outcomes by systematically integrating environmental, social and economic dimensions in the UNEP-funded programmes and projects
- To strengthen alignment of UNEP's work with the SDGs and other UN entities and partners in addressing the environmental and social sustainability of development efforts
- To set standards of sustainability for UNEP's operations thereby confirming UNEP's accountability to its member States, and other funders
- To enable UNEP to work in a safer and smarter manner, thereby minimising potential risks and harm to intended beneficiaries while enhancing UNEP's capabilities and credibility.

The ESSF is structured around guiding principles, safeguard standards and related operational modalities. The guiding principles of the framework are derived from the 2030 Agenda for Sustainable Development and include the following: Leave No One Behind, Human Rights and Gender Equality and Women's Empowerment, Sustainability and Resilience and Accountability. The safeguard standards of the framework comprise the following:

- Safeguard Standard 1: Biodiversity, Ecosystems and Sustainable Natural Resource Management
- Safeguard Standard 2: Climate Change and Disaster Risks
- Safeguard Standard 3: Pollution Prevention and Resource Efficiency
- Safeguard Standard 4: Community Health, Safety and Security
- Safeguard Standard 5: Cultural Heritage

²⁷ Green Climate Fund, 2018. Environmental and Social Policy. Available at: <https://www.greenclimate.fund/document/environmental-and-social-policy>. (Accessed: 21 June 2024)

²⁸ Green Climate Fund, 2021. GCF's Revised Environmental and Social Policy. Available at: <https://www.greenclimate.fund/document/revised-environmental-and-social-policy>. (Accessed: 24 June 2024)

²⁹ Green Climate Fund, 2018. GCF's Indigenous peoples policy (2018). Available at: <https://www.greenclimate.fund/document/indigenous-peoples-policy>. (Accessed: 24 June 2024)

³⁰ United Nations Environmental Programme, 2020. UNEP Environmental and Social Sustainability Framework (2020); Available at: <https://wedocs.unep.org/bitstream/handle/20.500.11822/32022/ESSFEN.pdf?sequence=1&isAllowed=y>. (Accessed: 24 June 2024)

- Safeguard Standard 6: Displacement and Involuntary Resettlement
- Safeguard Standard 7: Indigenous Peoples
- Safeguard Standard 8: Labour and Working Conditions

In order to operationalise the ESSF, the framework includes a) screening, assessment, management and monitoring of environmental and social risks; and b) steps for ensuring meaningful stakeholder engagement and accountability. To screen projects, UNEP utilises the Safeguard Risk Identification Form (SRIF). The form is used to identify any potential environmental or social risks and impacts associated with the proposed activities, and to identify opportunities to support other positive changes to the environment and society. The completed SRIF for the proposed project has been included as Annex 12b.

Other than the ESSF, UNEP is also committed to ensure compliance with all of the policies and regulations outlined in this section.

3.5 Gender policies

Policies, strategies, and other agreements related to gender, including Sexual Exploitation, Abuse and Harassment (SEAH) and Gender-Based Violence (GBV) are presented in Section 4 of the Gender Assessment (Annex 4a).

3.6 International and regional policies, strategies, conventions and treaties

The project is aligned with several international and regional policies, strategies, conventions and treaties, as outlined below.

Early Warnings for All

The Early Warnings for All (EW4All) initiative aims at ensuring that everyone on Earth is protected from hazardous weather, water and climate events through early warning systems by the end of 2027. The project will strengthen climate services and impact-based multi-hazard early warning in Maldives, directly contributing to the EW4All goal.

Sendai Framework for Disaster Risk Reduction 2015-2030

The Sendai Framework for Disaster Risk Reduction – adopted in 2015 – highlights the need to “substantially increase the availability of and access to multi-hazard early warning systems and disaster-risk information and assessments to the people by 2030.” It urges efforts to make forecasting and CIEWSs more efficient, integrated and sustainable, which aligns with the outcomes of the project. The project contributes to progress towards all four identified priorities for action: 1. Understanding disaster risk; 2. Strengthening disaster risk governance to manage disaster risk; 3. Investing in disaster risk reduction for resilience; 4. Enhancing disaster preparedness for effective response and to “Build Back Better” in recovery, rehabilitation and reconstruction.

Asia-Pacific Action Plan for Implementation for the Sendai Framework for Disaster Risk Reduction

Following the call for the development of regional action plans and strategies of the Sendai Framework, the national governments of the Asia-Pacific region and partners agreed to develop a joint plan for preventing disaster risk to protect sustainable development. The 2015-2030 Plan for Implementation defines actions to be taken at the regional, national, and local levels for the achievement of the four priorities outlined in the Sendai Framework:

- Priority 1 – Understanding disaster risk: the Asia-Pacific Action Plan includes making risk, forecast, early warning and disaster impact information publicly available and accessible by everyone;
- Priority 2 – Strengthening disaster risk governance to manage disaster risk: the Implementation Plan calls for actions to adopt and promote coherent planning and implementation of disaster risk reduction and climate change adaptation strategies that also promote gender equality;
- Priority 3 – Investing in disaster risk reduction for resilience: this priority area ensures that countries allocate the necessary resources for the development and implementation of disaster risk reduction and climate change adaptation.
- Priority 4 – Enhancing disaster preparedness for effective response and to “Build Back Better” in recovery, rehabilitation and reconstruction: the Action Plan for Implementation includes actions at national and local level regarding prevention, preparedness, and recovery.

The project contributes to progress towards all four identified priorities for action at the national and local level in Maldives.

Asia-Pacific Ministerial Conference on Disaster Risk Reduction 2024

The Ministerial Conference drew insights from the mid-term review of the Sendai Framework and highlighted the goal of the Early Warnings for All initiative. The co-chairs issued a statement summarizing the highlights of the Conference and underscoring remaining gaps for the Asia-Pacific region's efforts to align with the four priority areas of the Sendai Framework. The project directly supports the conference's key calls to action by broadly supporting progress towards Disaster Risk Reduction efforts in Maldives.

SAMOA Pathway

The SAMOA Pathway addresses unique challenges faced by SIDS and supports their sustainable development. Key priorities outlined within the SAMOA Pathway are climate change adaptation and resilience, disaster risk reduction, and strengthening infrastructure and capacity building. The project directly contributes to these areas and supports the improvement of Maldives' resilience to climate-related disaster risks.

Paris Agreement on Climate Change

The project contributes to advancing the objectives of the Paris Agreement on Climate Change by consolidating Maldives' positioning in the following key areas:

- Article 7:
 - Art 7.7(c): *Strengthening scientific knowledge on climate, including research, systematic observation of the climate system, and early warning systems, in a manner that informs climate services and supports decision-making.*
 - Art 7.9: *Each Party shall, as appropriate, engage in adaptation planning processes and the implementation of actions, including the development or enhancement of relevant plans, policies and/or contributions*
- Article 8:
 - Art 8.1: *Parties recognize the importance of averting, minimizing and addressing loss and damage associated with the adverse effects of climate change, including extreme weather events and slow onset events, and the role of sustainable development in reducing the risk of loss and damage.*
 - Art 8.4: *Accordingly, areas of cooperation and facilitation to enhance understanding, action and support may include: a) early warning systems [...]*

Sustainable Development Goals

The project will support national progress towards the SDGs, in particular

- SDG 3 – Good Health and Well-being: by reducing the health impacts of extreme weather- and climate events, the strengthening of Maldives' EWS contributes to SDG 3.
- SDG 5 – Gender Equality: the project will promote, enforce and monitor equality and non-discrimination on the basis of sex as a cross-cutting priority in line with SDG 5.
- SDG 13 – Climate Action: strengthening EWS helps Maldives to adapt to climate-related hazards, directly supporting SDG 13 which calls for action to combat climate change and its impacts.

4 SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (SEAH) RISK SCREENING

The GCF Sexual Exploitation, Abuse and Harassment (SEAH) Risk Screening toolkit is designed to assess the SEAH risks related to proposed projects in order to predict, mitigate and ideally prevent such risks from occurring. Table 2 below provides an assessment of the baseline conditions and risks relating to SEAH that may be created or exacerbated by the proposed project activities.

Table 2. GCF SEAH Risk Screening Checklist

Ensuring basic risk mitigation measures are in place ahead of stakeholder engagement	Assessment
<i>Does the AE have a SEAH Policy (or SEAH provisions in another policy)?</i>	<p>UNEP as AE has several policies related to the prevention of sexual harassment and sexual exploitation and abuse,³¹ which are listed below:</p> <ul style="list-style-type: none"> • ST/SGB/2019/8: Addressing discrimination, harassment, including sexual harassment and abuse of authority • ST/SGB/2003/13: Special Measures for protection against sexual exploitation and sexual abuse • ST/AI/2017/1: Unsatisfactory conduct investigation and the disciplinary process <p>All UN personnel and non-staff personnel and are subject to these policies. “Non-staff personnel” refers to individuals performing services in a direct or other agreed relationship with the organisation, including individual consultants.</p> <p>UNEP has a zero-tolerance policy towards Sexual Misconduct. The term Sexual Misconduct refers to Sexual Harassment and Sexual Exploitation and Abuse.</p>
<i>If the AE has contracted out stakeholder consultations, does that entity have a SEAH Policy (or are they contractually bound to apply the AE’s)?</i>	<p>UNEP has contracted out some stakeholder consultations to an individual consultant in relation to the Gender Assessment (Annex 4a). That consultant does not have an SEAH policy. However, the firm that the consultant founded (SAEDI Consulting Barbados Inc.) has an SEAH Self Declaration Form, which states that that firm has a “zero tolerance for sexual abuse, sexual harassment, and sexual exploitation, and agrees to adhere to the SAEDI Consulting Barbados Inc. Code of Conduct in order to prevent and respond to incidents of sexual misconduct in the workplace”. Additionally, the consultant is contractually bound to apply the AE’s SEAH policies.</p> <p>As per the UN Secretary-General’s Bulletin ST/SGB/2019/8, non-staff personnel, including individual consultants, are required to adhere to the UN’s zero-tolerance policy on prohibited conduct (which includes discrimination, harassment, including sexual harassment, and abuse of authority) and commit to taking adequate action if faced with allegations of prohibited conduct. Failure to do so may lead to the termination of contractual arrangements. Non-staff personnel (including consultants) who are alleged to have committed prohibited conduct may be subject to action in accordance with the terms and conditions of the contract governing their services and of other applicable policies regarding non-staff personnel, including possible referral to local authorities.³²</p>

³¹ UNEP, 2024. Prevention and Response to Sexual Misconduct. Available at: <https://www.unep.org/about-un-environment-programme/policies-and-strategies/prevention-and-response-sexual-misconduct> (Accessed: 26 June 2024)

³² UN Secretariat, 2019. Addressing discrimination, harassment, including sexual harassment, and abuse of authority. Available at: <https://documents.un.org/doc/undoc/gen/n19/274/41/pdf/n1927441.pdf?> (Accessed: 24 July 2024)

Does the AE have an employee Code of Conduct?	<p>UNEP as the AE has several policies that inform the code of employee conduct, namely:</p> <ul style="list-style-type: none"> • ST/SGB/2023/1: Staff Regulations and Staff Rules, including provisional Staff Rules, of the United Nations • ST/AI/2017/1: Unsatisfactory conduct, investigation and the disciplinary process <p>These rules and regulations inform how employees should conduct their behaviour, and the obligations based on this.</p>
If the AE has contracted out stakeholder consultations, does that entity have an employee Code of Conduct (or are they contractually bound to apply the AE's)?	The individual consultant contracted to undertake stakeholder consultations in the context of the Gender Assessment (Annex 4a) does have a Code of Conduct. Additionally, the consultant is contractually bound to apply the UN Secretary-General's Bulletin ST/SGB/2002/9 (<i>Regulations Governing the Status Basic Rights and Duties of Officials other than Secretariat Officials and Experts on Mission</i>), ³³ which amongst other states that "Any form of discrimination or harassment, including sexual or gender harassment, as well as physical or verbal abuse, at the workplace or in connection with work, is prohibited".
Have AE employees and consultants conducting stakeholder consultations been trained on preventing SEAH and the Code of Conduct?	UNEP requires all employees to undertake a mandatory course on "United to Respect: Addressing Sexual harassment and other prohibited conduct". ³⁴
Does the AE have a grievance mechanism in place in case of early SEAH complaints from stakeholder engagement?	UNEP as the AE has an established grievance redress mechanism in place, as outlined in Section 7.
Does the AE have a specialist on staff who can undertake the more advanced assessment in Stage 4 ³⁵ as well as deal with early SEAH complaints if they arise; and if not, does the AE require budget and /or assistance with this?	<p>UNEP engaged a consultant Gender Specialist to support the more advanced SEAH assessment as part of the development of the Funding Proposal. UNEP's Gender and Safeguards Unit (GSU) provided review and feedback on the advanced assessment.</p> <p>UNEP also has a dedicated full-time staff who can deal with early SEAH complaints if they arise. Reports of Sexual Harassment should be submitted to the Office of Internal Oversight Services/Investigation Division (OIOS/ID), the Executive Director (with a copy to the OIOS/ID oios@un.org), and the Line Manager who must transmit the report to the Executive Director.</p>
Contextual Level / Baseline Conditions	Assessment
Does the country have laws prohibiting sexual harassment / stalking generally?	Maldives has several laws prohibiting sexual harassment, at least one of which includes reference to stalking. The extent to which sexual harassment and stalking are defined and punished across the listed Acts varies. A 2023 report commissioned by UNFPA Maldives made several recommendations for law reform in accordance with existing UN guidance on human rights and

³³ UN, 2002. Regulations Governing the Status Basic Rights and Duties of Officials other than Secretariat Officials and Experts on Mission. Available at: <https://documents.un.org/doc/undoc/gen/n02/434/58/pdf/n0243458.pdf> (Accessed: 3 December 2024)

³⁴ UNEP, 2024. Prevention and Response to Sexual Misconduct. Available at: <https://www.unep.org/about-un-environment-programme/policies-and-strategies/prevention-and-response-sexual-misconduct> (Accessed: 26 June 2024)

³⁵ Stage 4 of the programming cycle refers to risk assessment and mitigation when developing Funding Proposals

	<p>specifically the rights of women.³⁶ The relevant Acts and associated recommendations are outlined below:</p> <ul style="list-style-type: none"> • <i>Prevention of Sexual Abuse and Harassment Act (2014)</i>:³⁷ The Act prohibits sexual harassment in the workplace (section 3) and in institutions (section 9) and provides for damages (section 33). It has been recommended to amend the Act to include prohibition of “violence and harassment, including gender-based violence and harassment”. • <i>Sexual Offences Act (2014)</i>:³⁸ The Act provides security for the survivors of a sexual offence. It also states what constitutes a sexual offence in the Maldives and the procedure related to these offences. There is no specific mention of stalking in this Act. • <i>Gender Equality Act (2016)</i>:³⁹ Section 14(b)(9) of the Act defines gender-based violence against women as including trafficking of girls and women or obtaining benefits through the trafficking of girls and women. There is no specific mention of stalking in this Act. • <i>Domestic Violence Prevention Act (2012)</i>:⁴⁰ The Act stipulates provisions for the prohibition and prevention of domestic violence and outlines measures taken against persons who commit acts of domestic violence. It details the protection of and support for victims of domestic violence, the role of the relevant State authorities, and the collaboration between such State authorities. The Act defines domestic violence as including verbal and psychological abuse (section 4(a) (3)), intimidation (section 4(a)(8)), harassment (section 4(a)(9)), and stalking (section 4(a)(10)). The Act does not specifically criminalise domestic violence and thus it has been recommended to amend the Act so that domestic violence can be prosecuted and sanctioned with appropriate penalties commensurate with the severity of abuse.
Do labour laws prohibit sexual harassment in the workplace?	<p>The Employment Act (Law No. 2/2008)⁴¹ makes no reference to sexual harassment in the workplace. The Prevention of Sexual Abuse and Harassment Act (2014)⁴² does however prohibit sexual harassment in the workplace (section 3) and in institutions (section 9) and provides for damages (section 33).</p>

³⁶ UNFPA, 2023. Human Rights & Gender Review of Gender-Based Violence Related Laws in the Maldives. Available at: [unfpa_humanrights_genderreview_of_gbvrelatedlaws_in_maldives.pdf](https://maldives.un.org/sites/default/files/2024-02/unfpa_humanrights_genderreview_of_gbvrelatedlaws_in_maldives.pdf). (Accessed: 26 June 2024)

³⁷ Human Rights and Gender Review of Gender Based Violence Laws in the Maldives, 2023. https://maldives.un.org/sites/default/files/2024-02/unfpa_humanrights_genderreview_of_gbvrelatedlaws_in_maldives.pdf. (Accessed: 26 June 2024)

³⁸ UNFPA, 2021. Gender-Based Violence During Covid-19 Pandemic In The Maldives: An Analysis Of Reported Cases (2021). https://maldives.unfpa.org/sites/default/files/pub-pdf/gbv_analysis_final.pdf. (Accessed: 26 June 2024)

³⁹ UNFPA, 2023. Human Rights & Gender Review of Gender-Based Violence Related Laws in the Maldives. Available at: [unfpa_humanrights_genderreview_of_gbvrelatedlaws_in_maldives.pdf](https://maldives.un.org/sites/default/files/2024-02/unfpa_humanrights_genderreview_of_gbvrelatedlaws_in_maldives.pdf). (Accessed: 26 June 2024)

⁴⁰ UNFPA, 2023. Human Rights & Gender Review of Gender-Based Violence Related Laws in the Maldives. Available at: [unfpa_humanrights_genderreview_of_gbvrelatedlaws_in_maldives.pdf](https://maldives.un.org/sites/default/files/2024-02/unfpa_humanrights_genderreview_of_gbvrelatedlaws_in_maldives.pdf). (Accessed: 26 June 2024)

⁴¹ Labour Relations Authority, 2022. Employment Act Law No. 2/2008. <https://lra.gov.mv/wp-content/uploads/2020/07/Employment-Act-Unofficial-English-Translation.pdf>. (Accessed: 26 June 2024)

⁴² UNFPA, 2023. Human Rights and Gender Review of Gender Based Violence Laws in the Maldives. Available at: https://maldives.un.org/sites/default/files/2024-02/unfpa_humanrights_genderreview_of_gbvrelatedlaws_in_maldives.pdf. (Accessed: 26 June 2024)

<i>Does the country have laws prohibiting intimate partner violence (IPV)?</i>	In the Domestic Violence Act (2012), ⁴³ the definition of a domestic relationship includes those “persons who are in an intimate relationship”. “Domestic violence” refers to acts by a perpetrator where such conduct harms or may cause imminent harm to, the safety, health, or wellbeing of the victim(s). The Law determines provisions for the prohibition and prevention of domestic violence; measures taken against persons who commit acts of domestic violence; protection of and support for victims of domestic violence; the role of the relevant State authorities; and the collaboration between such State authorities.
<i>What is the prevalence of gender-based violence (GBV) in the country?</i>	According to UNFPA Maldives, ⁴⁴ 1 in 3 women report experiencing violence in their lifetime and 1 in 4 women report being subjected to intimate partner violence. Moreover, 26% of women aged 15-49, believe that certain circumstances can justify a partner’s violent actions.
<i>What is the legal age a person can marry?</i>	The Family Act of the Maldives (2000) ⁴⁵ states in Article 4 that the minimum age of marriage for each person entering the marriage is 18. However, in accordance with Islamic Sharia Law, individuals who have reached puberty can marry before 18 years with the permission of the Registrar of Marriages.
<i>Despite any laws, what is the prevalence of child marriage in the country?</i>	Two percent of girls and two percent of boys in the Maldives are married before the age of 18. Child marriage may be increasing in certain islands, namely Hulhumale’ (with a 16% increase between 2015 and 2016), which has been suggested to be possibly due to the rise of a conservative form of Islam. ⁴⁶
<i>What is the income level of the country?</i>	Maldives is an upper-middle-income country. The Gross National Income (GNI) per capita is USD 9,310. ⁴⁷
<i>Where does the country rank on global gender indices?</i>	Maldives has a Gender Development Index (GDI) value of 0.976, placing it in Group 1, which corresponds to high equality in Human Development Index (HDI) achievements. The Gender Inequality Index (GII) value of 0.328 ranked Maldives 76 out of 166 countries in 2022. ⁴⁸
<i>Is there a national action plan on GBV and/or sexual harassment?</i>	Maldives also has a National Gender Equality Action Plan (2022-2026), which includes a core goal of elimination of GBV. ⁴⁹ In addition, Maldives has national guidelines to support healthcare

⁴³ Human Rights Commission of The Maldives, 2022. Domestic Violence Act - Act Number 3/2012. Available at: <https://hrcm.org.mv/storage/uploads/bVw9lRov/cn5vxphd.pdf>. (Accessed: 26 June 2024)

⁴⁴ UNFPA Maldives, 2024. Gender-Based Violence & Social Norm Change. Available at: <https://maldives.unfpa.org/en/topics/gender-based-violence-social-norm-change> (Accessed: 3 December 2024)

⁴⁵ Family Court Maldives, 2000. Family Act (2000). Available at: <https://familycourt.gov.mv/wp-content/uploads/2020/10/Family-Act-English-Translation.pdf>. (Accessed: 26 June 2024)

⁴⁶ Girls Not Brides. Child Marriage Atlas - Maldives (2019). Available at: <https://www.girlsnotbrides.org/learning-resources/child-marriage-atlas/regions-and-countries/maldives/> (Accessed: 19 June 2024)

⁴⁷ The World Bank. Doing Business Archive – Maldives. Available at: <https://archive.doingbusiness.org/en/data/exploreconomies/maldives> (Accessed: 19 June 2024)

⁴⁸ UNDP, 2024. Human Development Reports Data – Maldives. Available at: <https://hdr.undp.org/data-center/specific-country-data#/countries/MDV> (Accessed 19 June 2024)

⁴⁹ Government of Maldives, 2022. National Gender Equality Action Plan. Available at: <https://gender.gov.mv/en/wp-content/uploads/sites/1/2022/03/GEAPFinal.pdf>. (Accessed: June 19, 2024)

	providers in the provision of high-quality services to survivors of GBV and to prevent GBV in the community. ⁵⁰
<i>Does the country have specialized services for survivors of GBV (at both the national and local level) including women's shelters, adequate medical facilities and facilities which provide psycho-social support?</i>	<p>The health sector has a major role in responding to survivors of GBV by providing medical, medico-legal, and emotional support in collaboration with law enforcement. The "Health Sector Response to GBV: National Guideline on providing care and prevention for Health Care Providers" (2014)⁵¹ is the primary response to GBV in Maldives. It outlines a number of laws and related fatwas which enable protection of survivors through provision of health and social protection services. It states that the Government of Maldives has a dedicated service point to provide health services to survivors of GBV.</p> <p>The Ministry of Social and Family Development (MSFD) has so far established and/or consolidated resources and staffing for four shelters for survivors of violence. In 2021, 160 survivors were provided with temporary accommodation and other rehabilitation services from the shelters.⁵² There are a further 19 Family and Children's Services Centres (FCSCs) covering all atolls of the country (and thus serving multiple islands). The FCSCs provide social work support and, for rural areas, are considered (alongside the Police) as the main service provider within domestic violence case management on the islands.⁵³</p>
<i>Is the country currently experiencing war, internal conflict or humanitarian disaster?</i>	Maldives is not currently experiencing war, internal conflict or humanitarian disaster. The country is not listed in the UNHCR emergency preparedness and response report (2023). ⁵⁴
Project-level Risks	Assessment
<i>Are women concentrated in lower paid roles and mostly line-managed and supervised by men?</i>	As outlined in the project's Gender Assessment (Annex 4a), women in the Maldives are typically concentrated in lower paid jobs. Moreover, women are more likely to work in informal sectors where they face economic barriers.
<i>Are piece-rate systems or other performance-related pay structures used where individuals are in control of how much other workers get paid?</i>	The project does not propose to use piece-rate systems or other performance-related pay structures.
<i>Will project workers have control over life-changing resources such as the allocation of compensation for displacement or access to basic or highly sought-after resources?</i>	Project workers will not have control over life-changing resources such as the allocation of compensation for displacement or access to basic or highly sought-after resources.

⁵⁰ Health Protection Agency, 2014. Health Sector Response to GBV. National Guideline on providing care and prevention for Health Care Providers. Available at: <https://health.gov.mv/storage/uploads/9kob0GY8/svpdeqsd.pdf>. (Accessed: 3 December 2024)

⁵¹ UNFPA, 2014. Health Sector Response to GBV. Available at: https://maldives.unfpa.org/sites/default/files/pub-pdf/NationalGuideline_HealthSectorResponsetoGBV-Online.pdf. (Accessed: 24 June 2024)

⁵² Government of Maldives, 2022. National Gender Equality Action Plan. Available at: <https://gender.gov.mv/en/wp-content/uploads/sites/1/2022/03/GEAPFinal.pdf>. (Accessed: June 19, 2024)

⁵³ UN CEDAW, 2019. Sixth periodic report submitted by Maldives under article 18 of the Convention, due in 2019. Available at: <https://digitallibrary.un.org/record/3838548?ln=en&v=pdf> (Accessed: 5 August 2024)

⁵⁴ UNHCR. Emergency Preparedness and Response 2023. Available at: <https://reporting.unhcr.org/unhcr-emergency-preparedness-and-response-2023>. (Accessed: June 19, 2024)

<i>Will security personnel be used? Will they be armed?</i>	Security personnel will not be used during the project.
<i>Will there be an influx of male workers into the project area (as opposed to only using local labour)?</i>	The project does not envisage an influx of workers of either sex into the project area. A small number of international experts/ consultants (including males) will work in the project area, but this will be on a short-term basis and is not envisaged as an influx of workers.
<i>Are local communities poor and lacking basic resources?</i>	In the remote atolls in particular, local communities can face poverty and resource shortages. The national poverty rate is relatively low, with 5.4% of people living below the national poverty line in 2019. However, it should be noted that poverty is mainly concentrated in atolls outside of the capital; the rate in atolls is 9.5%, whereas the rate in Male' is 0.9%. ⁵⁵ Resource challenges are discussed in detail in the Gender Assessment (Annex 4a).
<i>Will migrant workers be employed by the project, especially those who may not speak the local language? Will they be employed on a temporary or daily basis?</i>	Details of the workers who will be employed by the project cannot be known at this stage. However, all work conducted during the project will be executed in accordance with Maldives' Employment Act (2008) and the ILO Conventions.
<i>Will project workers all have formal contracts?</i>	In line with Maldives' Employment Act (2008) and the ILO Conventions, all project workers will have formal contracts.
<i>Will goods frequently be transported over long distances, especially through poor and/or remote communities?</i>	The project will require goods to be transported to remote and sometimes poor communities, including for the upgrading of hydrometeorological equipment and communication systems, and provision of equipment for emergency response teams. These activities will be implemented on a low-frequency basis.
<i>Are worksites or project activities based in remote locations? Will worksites be spread out, with isolated spaces?</i>	Project activities will be implemented in remote locations, owing to the geography of Maldives.
<i>Will project workers live in the community or in worker housing? If in worker housing, is it mixed sex?</i>	Project workers will live in the community.
<i>Will workers be required to travel long and potentially unsafe distances, and at times of day when transport options may be limited?</i>	Due to the geography of the Maldives, travelling across the country can be time consuming, and in adverse weather conditions, potentially dangerous. All reasonable efforts will be undertaken to ensure the safety of workers when travelling, including postponing travel in the event of dangerous weather conditions.
<i>Will the project operate in highly pressurised work environments, with tight seasonal deadlines?</i>	The project will not operate in highly pressurised work environments. It is expected that certain activities may be time sensitive. However, all reasonable efforts will be undertaken to ensure a safe and healthy work environment.
<i>Is the project located within a male-dominated sector where female workers will be employed?</i>	The project activities cover multiple sectors, some of which are in male-dominated (noting that the overall labour force participation rate in 2023 was 42.6% among females and 78.6% among

⁵⁵ IBRD / The World Bank, 2022. Poverty and Inequality in Maldives – 2022

	<p>males⁵⁶). The main male-dominated sector/entity where female workers may be employed is Maldives Meteorological Service (MMS), which will host the Project Management Unit. Over 70% of the MMS workforce (77 out of 107 employees) are male. While MMS does not currently have a Gender Policy, MMS has expressed commitment to the National Gender Equality Action Plan 2020-2023.⁵⁷ Under the Systematic Observations Financing Facility (SOFF) Investment Phase, MMS is being supported to develop an organisational Gender Policy and undertake trainings related to gender equality and gender mainstreaming.⁵⁸ All work conducted during the project will be executed in accordance with Maldives' Employment Act (2008) and the ILO Conventions.</p>
<p><i>Have communities, especially low income/ vulnerable communities, voluntarily raised concerns in relation to SEAH/GBV during consultations?</i></p>	<p>No concerns in relation to SEAH/GBV have been raised by communities during consultations. Issues related to SEAH/GBV have been assessed as part of the project Gender Assessment (Annex 4a) and opportunities to address SEAH/GBV risks have been discussed with national stakeholders (including the Ministry of Social and Family Development and National Disaster Management Authority) and incorporated within the project design.</p>
<p><i>Have any changes been made to project design or adaptive management undertaken due to concerns of stakeholders and communities? (If yes, work through this checklist again)</i></p>	<p>No changes have been made to the project design, nor has there been any adaptive management undertaken due to the concerns of stakeholders and communities.</p>

⁵⁶ World Bank, 2024. Gender Data Portal – Maldives. Available at: <https://liveprod.worldbank.org/en/economies/maldives> (Accessed: 3 December 2024)

⁵⁷ FMI and BMKG, 2023. Country Hydromet Diagnostics – Maldives Meteorological Service (MMS) Review Report

⁵⁸ UN MPTFO, 2024. SOFF Maldives Investment Phase. Available at: <https://mptf.undp.org/project/00140656> (Accessed: 3 December 2024)

5 ANALYSIS OF PROJECT RISKS AGAINST IFC PERFORMANCE STANDARDS

Table 3 below is an assessment of the expected project risks against the eight International Finance Corporation (IFC) performance standards.⁵⁹

Table 3. Assessment of project risks against IFC standards

IFC Performance Standard	Project Risk Assessment	Overall Risk
<p>Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts</p> <p>Objectives:</p> <ul style="list-style-type: none"> To identify and evaluate environmental and social risks and impacts of the project To adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimise, and, where residual impacts remain, compensate/offset for risks and impacts to workers, Affected Communities, and the environment To promote improved environmental and social performance of clients through the effective use of management systems To ensure that grievances from Affected Communities and external communications from other stakeholders are responded to and managed appropriately To promote and provide means for adequate engagement with Affected Communities throughout the project cycle on issues that could potentially affect them and to ensure that relevant environmental and social information is disclosed and disseminated. 	<p>An environmental and social safeguards (ESS) screening was conducted during the preparation of the project concept note. Based on the screening, the project was evaluated to be Category C (<i>Activities with minimal or no adverse environmental and/or social risks and/or impacts</i>). This risk categorisation has been reconfirmed as per the assessment provided in Table 4 below. An Environmental and Social Action Plan (ESAP) has been prepared and outlines actions to mitigate any minimal risks and impacts associated with the project activities. The ESAP is provided as Section 6.</p> <p>As outlined in Section 3, the Regulation on the Preparation of Environmental Impact Assessment (EIA) Report of the Republic of Maldives requires an EIA for any development work or project that falls within a detailed list of project types.⁶⁰ The proposed project does not fall within the specified types and is thus deemed exempt from requiring an EIA under national regulations.</p> <p>A project-level Grievance Redress Mechanism (GRM) has been developed (see Section 7.1) with the aim of ensuring that any grievances from Affected Communities are responded to and managed appropriately. There is a risk that Affected Communities are insufficiently informed about the GRM. Informing on the GRM should be ensured as part of the stakeholder engagement process.</p> <p>Contact details for the Executing Entities are readily available, thus providing a means to receive external communications from the public. Once established, the Project Management Unit (PMU) will be expected to implement and maintain a procedure for external communications to ensure that any communications received are registered and dealt with effectively.</p> <p>Stakeholder engagement is key to identifying and anticipating risks associated with the project, and for the successful management of the project's environmental and social impacts. Ensuring that stakeholder engagement is meaningful and inclusive is an overarching priority throughout the project cycle. However, there is a residual risk that this will not be achieved. The Summary of Consultations and Stakeholder Engagement Plan (SEP) is provided as Annex 13 and includes a detailed stakeholder analysis. The consultation process has been tailored to the</p>	Low

⁵⁹ IFC. Performance Standards. Last Accessed 11 September 2024.

⁶⁰ The list of proposals requiring an Environmental Impact Assessment Study is provided as Schedule D to the Regulation.

	<p>language preferences of the Affected Communities, where possible.⁶¹ Given the substantial migrant population in Maldives, there is a risk of miscommunication with migrant communities due to language barriers. Resources have been allocated to enable translation services to be provided during project implementation, which should mitigate this risk. The SEP outlines the key stakeholders involved, along with the method and frequency of engagement. The SEP also provides information on disclosure of information and considerations for engagement of vulnerable and/or marginalised groups.</p> <p>Regarding Performance Standard 1, the project presents limited environmental and social (E&S) risks. The main risk identified is the capacity of the Ministry of Tourism and Environment (MTE) as the national Executing Entity to monitor and manage E&S risks. A Harmonized Approach to Cash Transfers (HACT) micro-assessment was undertaken during project preparation. The assessment identified two weaknesses relating to E&S standards:</p> <ul style="list-style-type: none"> • Lack of formal integration of social standards into activities⁶² • Lack of formal documentation of ongoing monitoring of project risks and mitigating measures. <p>In the context of the proposed project, these weaknesses are deemed straightforward to overcome. Social standards are integrated into activities, as articulated in the ESAP and SEP. The GCF requires project risks and mitigating measures to be continuously monitored and systematically documented. As outlined in the project monitoring, reporting and evaluation arrangements (Section 5, Annex 2a) a dedicated Monitoring and Evaluation Officer will be engaged by MTE to design and implement a performance monitoring and evaluation framework to track the project's progress towards achieving its targets. This will include monitoring the E&S performance of the project. UNEP as the Accredited Entity (AE) will provide support to MTE as needed to ensure that the required monitoring and reporting processes are effectively implemented.</p> <p>A Project Steering Committee (PSC), co-chaired by MTE and UNEP, will also be established to ensure that the project is meeting its targets.</p>	
<p>Performance Standard 2: Labor and Working Conditions</p> <p>Objectives:</p>	<p>The project will involve the hiring of project staff and international and local consultants. Responsibility for hiring project workers will predominantly rest with MTE as the national EE. As reported in the HACT micro-assessment undertaken for the project preparation, MTE follows the Civil Service Regulation of the Maldives, which covers</p>	Low

⁶¹ Stakeholders have been enabled to express themselves in English or Dhivehi, which are the two main languages spoken in Maldives.

⁶² As the Ministry responsible for environmental matters, it should be noted that environmental standards are integrated into all aspects of MTE's activities.

<ul style="list-style-type: none"> • To promote the fair treatment, non-discrimination, and equal opportunity of workers • To establish, maintain, and improve the worker-management relationship • To promote compliance with national employment and labour laws • To protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties, and workers in the client's supply chain • To promote safe and healthy working conditions, and the health of workers • To avoid the use of forced labour 	<p>recruitment, employment and personnel practices. All vacancies, including for project staff, are publicly advertised. Staff recruitment follows a competitive process, which is documented in a transparent manner. The assessment identified two weaknesses relating to hiring of personnel, which may have implications for ESS:</p> <ul style="list-style-type: none"> • Lack of documented background checks for recruited project staff • Lack of inclusion of minimum expected qualifications in job descriptions, leading to the risk that staff may not have the relevant qualifications and/or experience to satisfactorily implement project activities. <p>In the context of the proposed project, these weaknesses are deemed straightforward to overcome. HR processes should include documented background checks for recruited project staff and job descriptions should include minimum expected qualifications.</p> <p>A small number of additional project workers will be engaged by UNEP and the project's Technical Partners. All partners have undergone the relevant due diligence processes and no risks regarding labour and working conditions have been identified.</p> <p>Contracts for all personnel, including contractual workers, will be executed in accordance with the relevant national labour laws (including Maldives's Employment Act No. 2/2008) and the ILO Conventions. Moreover, project personnel will be engaged through non-discriminatory and gender-sensitive HR processes in line with the principles of equal opportunity and fair treatment.</p> <p>The project will not use forced or child labour.</p> <p>Project interventions are not expected to pose significant occupational health and safety risks to workers. Nevertheless, there is a low risk of hazardous waste generation (see Performance Standard 3), which require appropriate health and safety provisions to be in place. Additionally, workers will be engaged in the project to support the deployment of hydrometeorological equipment, including land-based automatic weather stations and ocean monitoring sensors. This may involve working with electrical components, working at heights, and/or work in open waters – all of which present potential risks to the health and safety of workers. Mitigation measures for electrical safety and fall protection will be put in place, including for instance:</p> <ul style="list-style-type: none"> • All electrical installations are performed by certified personnel; • Procedures for de-energizing and checking of electrical equipment are in place before any maintenance work; • Fall protection measures including training, inspection and maintenance of fall protection equipment; <p>The mitigation measures will be consistent with the Environmental, Health, and Safety Guidelines for</p>	
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	<p>Telecommunications of the International Finance Corporation (IFC).⁶³</p> <p>UNEP as the AE and other responsible parties, including MTE, will be required to take all reasonable precautions to protect the health and safety of workers.</p>	
<p>Performance Standard 3: Resource Efficiency and Pollution Prevention</p> <p>Objectives:</p> <ul style="list-style-type: none"> To avoid or minimise adverse impacts on human health and the environment by avoiding or minimising pollution from project activities To promote more sustainable use of resources, including energy and water To reduce project-related greenhouse gas (GHG) emissions 	<p>Overall, the project activities are deemed to pose low risk regarding resource efficiency and pollution to air, water and land. Nevertheless, two (minor) specific risks have been identified as follows:</p> <ul style="list-style-type: none"> <i>Project-related GHG emissions</i> – Maldives is highly dependent on imported fossil fuels for energy generation, with renewables accounting for 1% of total energy supply.⁶⁴ In addition, there are certain activities where travel (including international travel) is required. Some level of project-related GHG emissions is therefore unavoidable. <i>Generation of waste</i> – There is a risk that small amounts of waste will be generated during the deployment or upgrade of technology and equipment (particularly under Output 2), which may lead to obsolescence of existing equipment and resultant waste management issues. The likelihood of runoff or generation of hazardous waste is low. <p>Project-related GHG emissions should be mitigated through the implementation of resource efficiency measures, including minimising international travel as much as practicable. Waste management should be undertaken in line with the Magey Saafu Raajje National Waste and Resource Management Policy and Strategy (2024-2028), which promotes a circular economy and encourages the reuse and recycling of materials where possible.</p>	Low
<p>Performance Standard 4: Community Health, Safety, and Security</p> <p>Objectives:</p> <ul style="list-style-type: none"> To anticipate and avoid adverse impacts on the health and safety of the Affected Community during the project life from both routine and non-routine circumstances To ensure that the safeguarding of personnel and property is carried out in accordance with relevant human rights principles and in a manner that avoids or 	<p>The project is not expected to involve or lead to the following circumstances, which would present risks in the context of community health, safety and security:</p> <ul style="list-style-type: none"> Design, construction, operation, or decommission of structural elements Release of hazardous materials or substances are not expected to be released Impacts of ecosystem services Community exposure to water-borne, water-based, water-related, and vector-borne diseases, and communicable diseases Engagement of security personnel. <p>The project aims to ultimately improve the health, safety and security of communities by strengthening capacities for preparedness and response. This is the specific focus of Output 4, which will work closely with communities to increase public awareness and education on climate-</p>	Low

⁶³ International Finance Corporation: Environmental, Health, and Safety Guidelines for Telecommunications. Accessible at: <https://www.ifc.org/content/dam/ifc/doc/2000/2007-telecommunications-ehs-guidelines-en.pdf>

⁶⁴ IRENA, 2024. Energy Profile – Maldives. Available at: https://www.irena.org/-/media/Files/IRENA/Agency/Statistics/Statistical_Profiles/Asia/Maldives_Asia_RE_SP.pdf (Accessed: 29 November 2024)

<p>minimises risks to the Affected Communities</p>	<p>related risks, as well as scale up community-based disaster risk management.</p> <p>Moreover, the identification and engagement of vulnerable and marginalised groups to ensure that their specific needs are considered in the project design will contribute to ensuring that project activities do not compromise their security or safety.</p>	
<p>Performance Standard 5: Land Acquisition and Involuntary Resettlement</p> <p>Objectives:</p> <ul style="list-style-type: none"> • To avoid, and when avoidance is not possible, minimise displacement by exploring alternative project designs • To avoid forced eviction • To anticipate and avoid, or where avoidance is not possible, minimise adverse social and economic impacts from land acquisition or restrictions on land use by (i) providing compensation for loss of assets at replacement cost and (ii) ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected • To improve, or restore, the livelihoods and standards of living of displaced persons • To improve living conditions among physically displaced persons through the provision of adequate housing with security of tenure at resettlement sites. 	<p>The project does not propose any land acquisition or restrictions on land use. As such, no involuntary resettlement is foreseen resulting from the project activities.</p> <p>The main intervention that would need to be cognisant of land use is Sub-Activity 2.1.4 (<i>Build capacity for Internet of Things and wireless technologies</i>), which will involve the deployment of automatic weather stations (AWS) in multiple sites across the country. Most of these AWS will be situated in sites where (non-operational) stations are already present. However, at least 10 AWS will be deployed in new locations. Before any equipment deployment is conducted at these sites, the national Executing Entity will ensure that the land is already government-owned and/or that the appropriate agreements are in place to utilise the land.</p> <p>It should be noted that the AWS to be deployed under Sub-Activity 2.1.4 are small and discrete by design. Impacts on land use (if any) are expected to be minimal and thus the project is deemed low risk in relation to Performance Standard 5.</p>	Low
<p>Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</p> <p>Objectives:</p> <ul style="list-style-type: none"> • To protect and conserve biodiversity • To maintain the benefits of ecosystem services • To promote the sustainable management of living natural resources through the adoption of practices that 	<p>The project is expected to have minimal to no adverse impacts on biodiversity conservation, ecosystems / ecosystem services, or natural resources.</p> <p>The main identified risk is the deployment of hydrometeorological observation equipment, including new land-based weather stations and ocean monitoring sensors (e.g., ocean buoys, tide gauges). However, the risk to biodiversity and natural resources as a result of the small-scale equipment deployment is considered low. Nevertheless, precautions must be taken during the implementation phase to ensure that there are no adverse environmental impacts.</p>	Low

integrate conservation needs and development priorities		
Performance Standard 7: Indigenous Peoples (IPs) Objectives: <ul style="list-style-type: none"> • To ensure that the development process fosters full respect for human rights, dignity, culture, and natural resource-based livelihoods of IPs • To anticipate and avoid adverse impacts of projects on communities of IPs, or when avoidance is not possible, to minimise and/or compensate for such impacts • To promote sustainable development benefits and opportunities for IPs in a culturally appropriate manner • To establish and maintain an ongoing relationship based on Informed Consultation and Participation (ICP) with the IPs affected by a project throughout the project's life cycle • To ensure the Free, Prior, and Informed Consent (FPIC) of the Affected Communities of IPs when the circumstances described in this Performance Standard are present • To respect and preserve the culture, knowledge and practices of IPs. 	As reported in the Gender Assessment (Annex 4a), Maldives does not have declared indigenous population. Therefore, the risk to IPs is low or non-existent.	Low
Performance Standard 8: Cultural Heritage Objectives: <ul style="list-style-type: none"> • To protect cultural heritage from the adverse impacts of project activities and support its preservation • To promote the equitable sharing of benefits from the use of cultural heritage 	<p>Maldives does not have any sites inscribed on the UNESCO World Heritage List but has one item on the Tentative List – the Coral Stone Mosques of Maldives, which are located in six sites across the country.⁶⁵ The project will not be implemented within or adjacent to the sites on the Tentative List. Moreover, the project activities are not intended to involve or have adverse impacts to other forms of tangible cultural heritage.</p> <p>In terms of intangible cultural heritage, the project is expected to have a positive impact, specifically through the promotion of traditional and local knowledge and its incorporation into early warning systems and disaster preparedness, which aims to improve the accessibility and</p>	Low

⁶⁵ UNESCO World Heritage Centre, 2024. Maldives. Available at: <https://whc.unesco.org/en/statesparties/mv/> (Accessed: 2 December 2024)

	<p>appropriateness of project interventions for local communities. The project will not use cultural heritage for commercial purposes.</p> <p>Given the project's emphasis on gender equality and social inclusion, equal sharing of benefits from the use of intangible cultural heritage is expected. Risks associated with Performance Standard 8 are thus deemed to be low.</p> <p>All activities will be undertaken and monitored in line with the Cultural Heritage Act (2019).</p>	
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Assessment of Risk Category

The IFC/GCF risk categorisation below details the three different risk categories based on potential project impacts to the environment and society.

- **Category A:** Activities with potential significant adverse environmental and/or social risks and impacts that, individually or cumulatively, are diverse, irreversible, or unprecedented.
- **Category B:** Activities with potential limited adverse environmental and/or social risks and impacts that individually or cumulatively, are few, generally site-specific, largely reversible, and readily addressed through mitigation measures.
- **Category C:** Activities with minimal or no adverse environmental and/or social risks and/or impacts.

Based on the assessment of environmental and social risks provided in Table 3, the project Outputs are categorised based on the IFC/GCF risk categorisation in Table 4 below. It should also be noted that the project will not fund any of the activities listed in the IFC Exclusion List (Appendix 2).

Table 4. Risk categorisation for Project Outputs

Project Output	Risk Categorisation
Output 1: Strengthened delivery model and risk knowledge for climate services and a multi-hazard early warning system	<p>Output 1 aims to strengthen institutional and legislative frameworks, coordination, and the overall delivery model for climate services and a multi-hazard early warning system in Maldives. This includes establishing a National Framework for Climate Services, inter-ministerial and multi-stakeholder coordination mechanism, financial framework, and guidelines for gender-responsive and socially inclusive disaster risk management.</p> <p>The main risk associated with Output 1 is the potential for inadequate engagement of stakeholders. For example, there is a need to ensure meaningful engagement of vulnerable and/or marginalised groups, including women and girls. At national level, engagement of all relevant ministries and sectors will be necessary to ensure a fully coordinated and integrated approach.</p> <p>As outlined in Table 3, the risks associated with stakeholder engagement (Performance Standard 1) are deemed to be low. In addition, the Gender Action Plan (Annex 4b) and Stakeholder Engagement Plan (Annex 13) include specific actions to address the identified risks.</p> <p>Minimal to no adverse environmental or social risks and impacts are expected to result from Output 1, which can therefore be considered as Category C.</p>
Output 2: Strengthened observations, monitoring, modelling and impact-based forecasting	<p>Output 2 focuses on strengthening observations, monitoring, modelling and impact-based forecasting through a combination of training and capacity building, and deployment of new equipment and IT-based systems. The latter mainly comprises the deployment of hydrometeorological observation equipment, including new land-based weather stations and ocean monitoring sensors (e.g., ocean buoys, tide gauges).</p>

	<p>The main environmental risks associated with Output 2 are i) waste generation (small amounts of waste may be produced following the deployment or upgrade of technology and equipment); and ii) environmental impacts associated with the deployment of hydrometeorological equipment.</p> <p>Social risks associated with Output 2 relate to land use and stakeholder engagement. Prior to any equipment deployment, the national Executing Entity will need to ensure that the proposed sites are already government-owned and/or that the appropriate agreements are in place to utilise the land.</p> <p>Regarding stakeholder engagement, there is a risk of inadequate engagement of key sectoral stakeholders, particularly in the co-production of sector-specific impact-based forecasts, decision support systems and associated advisories. Meaningful engagement of all relevant sectoral stakeholders is critical to ensure an effective co-production process. The Stakeholder Engagement Plan (Annex 13) has highlighted this and proposes actions to mitigate the risk.</p> <p>As outlined in Table 3, the risks associated with stakeholder engagement (Performance Standard 1), waste generation (Performance Standard 3), land use (Performance Standard 5), and impacts on biodiversity and natural resources (Performance Standard 6) are all considered low.</p> <p>Minimal to no adverse environmental or social risks and impacts are expected to result from Output 2, which can therefore be considered as Category C.</p>
<p>Output 3: Improved dissemination and communication of risk information and early warnings to the last mile</p>	<p>Output 3 aims to enhance the communication and delivery of risk information and early warnings, with a particular focus on ensuring that information is accessible and understandable at the “last mile”. The proposed activities range from development of guidelines and strategies (including Standard Operating Procedures for multi-hazard early warning advisories, socially inclusive and gender-responsive risk communication strategy, and a glossary on relevant terminologies) to the deployment of communications infrastructure to expand the reach of early warnings.</p> <p>The main risk associated with Output 3 is the potential for communications not to reach the most vulnerable and/or marginalised groups, meaning that the project benefits are not equitably shared across the population. Maldives has a highly geographically dispersed population, with many communities residing in remote locations. As described in the Gender Assessment (Annex 4a), the preferred means of communication may differ across the various islands and different population groups. For example, there is a large migrant population living in Maldives who speak several different languages, while persons with disabilities have specific needs that make the use of some communications channels more suitable than others. Communications – both the information itself and the channels used – must be tailored to the needs and capacities of target users to ensure that they reach and are understandable by all intended stakeholders and beneficiaries.</p> <p>The Gender Assessment (Annex 4a), Gender Action Plan (Annex 4b) and Stakeholder Engagement Plan (Annex 13) include detailed information and specific actions to mitigate the identified risks and ensure that the risk level (assessed in Table 3 via Performance Standard 1) remains low.</p> <p>Minimal to no adverse environmental or social risks and impacts are expected to result from Output 3, which can therefore be considered as Category C.</p>
<p>Output 4: Enhanced climate risk management capacity using climate information and early warnings</p>	<p>Output 4 focuses on the enhancement of climate risk management capabilities, underpinned by the use of climate information and early warnings. The interventions supported under this output comprise awareness and education activities, disaster preparedness and contingency planning, and the establishment of capacity for forecast-based and anticipatory action. These interventions focus on capacity building and training, which are inherently low-impact activities in terms of environmental and social risks.</p>

	<p>The main risk associated with Output 4 is the potential for inadequate engagement of stakeholders, particularly the identified vulnerable and/or marginalised groups at the community level (e.g., women, children, elderly persons, persons with disabilities, and migrants).</p> <p>As outlined in Table 3, the risks associated with stakeholder engagement (Performance Standard 1) are deemed to be low. In addition, the Gender Action Plan (Annex 4b) and Stakeholder Engagement Plan (Annex 13) include specific actions to address the identified risks.</p> <p>Minimal to no adverse environmental or social risks and impacts are expected to result from Output 4, which can therefore be considered as Category C.</p>
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Based on the assessment provided in Table 4, the project can therefore be rated **Category C**. As per GCF policy, an Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP) are not required. Nevertheless, an Environmental and Social Action Plan (ESAP) has been prepared to facilitate mitigation of the low-level risks. This is provided in Section 6.

6 ENVIRONMENTAL AND SOCIAL ACTION PLAN

The Environmental and Social Action Plan (ESAP) below (Table 5) summarises the potential risks identified in relation to the project activities and their significance, and outlines associated mitigation measures, responsible parties, implementation schedule, and estimated costs of carrying out the mitigation measures identified.

Table 5. Environmental and Social Action Plan (ESAP) for the project

Summary of risks	Mitigation measures	Risk Significance ⁶⁶	Responsible party/person	Schedule	Cost / Budget
<i>This contains the description of risks and can be derived from the responses to the screening questions</i>	<i>Options to avoid, reduce, mitigate risks and impacts. This may also indicate additional due diligence and specific management plans</i>	<i>This contains a description of the overall level of risk*</i>	<i>Individual person, unit, or entity tasked to carry out the mitigation measures</i>	<i>Timing of implementation of measures including any additional due diligence and management plans and may depend on the stage of implementation</i>	<i>Estimated cost of carrying out the measures</i>
Insufficient response to and management of grievances from Affected Communities and external stakeholders This could stem from insufficient information on the project-level Grievance Redress Mechanism (GRM) being provided to potentially Affected Communities	Information dissemination in relation to the GRM is included as part of the Stakeholder Engagement Plan (Annex 13). Guidance on GRM-related communications is provided in Section 7.1.11.	Low	Project Management Unit (PMU)	Throughout project implementation	USD 3,000 has been allocated to support roll-out of the GRM, including sensitisation and training of key staff and local stakeholders

⁶⁶ Risk significance range: Low, Medium, High

<p>Insufficient consideration of stakeholder needs, particularly in relation to vulnerable and/or marginalised groups</p> <p>There is a residual risk that if the specific needs of different population groups are not identified and addressed, then community health, safety, and/or security may be compromised.</p>	<p>The Gender Action Plan (Annex 4b) and Stakeholder Engagement Plan (Annex 13) set out actions to promote meaningful and inclusive engagement of project stakeholders, including specific reference to vulnerable and/or marginalised groups, which should inform the design and implementation of project interventions in a manner considerate of all relevant stakeholder needs.</p>	<p>Low</p>	<p>PMU National Partners Technical Partners UNEP</p>	<p>Throughout project development and implementation</p>	<p>USD 50,000 has been allocated to implement measures to facilitate full, equal and meaningful participation of women and other vulnerable and/or marginalised groups</p> <p>USD 67,500 has been allocated for translation services, including for in-person meetings/events</p>
<p>Inequitable realisation and/or distribution of project benefits, particularly in relation to vulnerable and/or marginalised groups</p> <p>There is a residual risk that the project benefits are not achieved in an equitable manner, which could in part stem from shortfalls in meaningful engagement and participation of all relevant stakeholders.</p>	<p>The Gender Action Plan (Annex 4b) and Stakeholder Engagement Plan (Annex 13) set out actions to promote meaningful and inclusive engagement of project stakeholders, including specific reference to vulnerable and/or marginalised groups, which should facilitate that all relevant stakeholders are engaged and empowered to meaningfully participate in the project activities.</p>	<p>Low</p>	<p>PMU National Partners Technical Partners UNEP</p>	<p>Throughout project implementation</p>	<p>USD 50,000 has been allocated to implement measures to facilitate full, equal and meaningful participation of women and other vulnerable and/or marginalised groups</p> <p>USD 67,500 has been allocated for translation services, including for in-person meetings/events</p> <p>Costs for targeting and/or tailoring information and interventions to specific stakeholder needs are included as part of the relevant activity budget</p>

<p>Insufficient capacity of the Ministry of Tourism and Environment (MTE) as the national Executing Entity to monitor and manage environmental and social (E&S) risks</p> <p>This includes the risk of safeguarding and/or general competency issues due to weaknesses in HR processes conducted by MTE.</p>	<p>A dedicated Monitoring and Evaluation (M&E) Officer and a supporting M&E International Specialist will be engaged by MTE to design and implement a performance monitoring and evaluation framework, including monitoring of E&S performance.</p> <p>Regarding hiring of project personnel, all HR processes should include documented background checks for all recruited project staff and job descriptions should include minimum expected qualifications/experience required of project staff.</p> <p>UNEP as the Accredited Entity (AE) will provide support to MTE as needed to ensure that monitoring and reporting and HR processes are effectively implemented.</p>	Low	MTE UNEP	Throughout project implementation	<p>USD 632,700 has been allocated for M&E</p> <p>No additional cost implications for mitigation measures associated with HR processes</p> <p>Support from UNEP is covered as part of the AE fee</p>
<p>Risks to health and safety of workers</p> <p>Workers will be engaged in the project to support the deployment of hydrometeorological equipment, including land-based automatic weather stations and ocean monitoring sensors. This may involve working with electrical components, working at heights, and/or work in open waters – all of which present potential</p>	<p>Risks can be mitigated by following good international industry practice (GIIP), including ensuring that workers are adequately trained and competent in their area. All contractors must be suitably qualified and hold the appropriate license(s).</p> <p>Regarding waste management, measures such as the provision of personal protective equipment (PPE), training of staff in waste handling, and emergency preparedness and response procedures should be put in place</p>	Low	Project Manager Technical Partners	Throughout project implementation	No additional cost implications

risks to the health and safety of workers. There is a low risk of hazardous waste generation, which could present risks to workers involved in waste management.	for the management of any eventualities.				
Project-related greenhouse gas (GHG) emissions Given the high dependence of Maldives on fossil fuels for energy generation and the necessity of travel (including international travel) to implement some of the project activities, some level of project-related GHG emissions is unavoidable.	Risks can be mitigated through the identification and implementation of resource efficiency measures where technically and financially feasible, including adoption of renewable or low carbon energy sources and minimisation of international travel where practicable.	Low	All project partners and stakeholders	Throughout project development and implementation	No additional cost implications
Generation of waste materials The main risk of waste generation is associated with the deployment or upgrade of technology and equipment.	Where waste generation cannot be avoided, the project team will reduce the generation of waste and recover and reuse waste in a manner that is safe for human health and the environment. Where waste cannot be recovered or reused, the project team will treat, destroy, or dispose of it in an environmentally-sound manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material. In the (unlikely) event that the generated waste is considered hazardous, the	Low	Project Manager Partners / contractors engaged to install or upgrade equipment	Mitigation measures should be planned in advance of equipment deployment or upgrades and implemented as part of the relevant project intervention	No additional cost implications

	<p>project team will adopt GIIP alternatives for its environmentally sound disposal. Measures such as the provision of personal protective equipment (PPE), training of staff in waste handling, emergency preparedness and response should be put in place for the management of any eventualities.</p> <p>Waste management will be undertaken in line with the Magey Saafu Raajje National Waste and Resource Management Policy and Strategy (2024-2008) and international good practices.</p>				
<p>Risk of grievances due to project-related land use in the context of deployment of automatic weather stations (AWS)</p> <p>No involuntary resettlement is expected to result from the project activities. There is a low risk of grievances arising from the deployment/ installation of at least 10 AWS in new locations.</p>	<p>Ensure that all equipment is deployed on government-owned land and/or that the appropriate agreements are in place to utilise the land.</p>	Low	<p>Project Manager</p> <p>MTE</p> <p>MMS</p>	<p>Mitigation measures should be implemented prior to the deployment of equipment</p>	<p>No additional cost implications</p>
<p>Risk to biodiversity, ecosystems and ecosystem services and/or natural resources</p> <p>There is a low risk that the (small-scale) deployment of hydrometeorological</p>	<p>Risks can be mitigated by following GIIP and ensuring compliance with relevant environmental regulations, including Maldives' Environmental Protection and Preservation Act (No. 4/93), the Natural Resources and Naturally Protected Species</p>	Low	<p>Project Manager</p> <p>Partners / contractors engaged to install or</p>	<p>Mitigation measures should be planned in advance of equipment deployment or upgrades and implemented as part</p>	<p>No additional cost implications</p>

observation equipment, including land-based weather stations and ocean monitoring sensors, will have adverse impacts on the surrounding natural environment.	Regulations (No. R/25 of 2021), and the Protected Areas Regulation (No.2018/R-78). No project activities will be conducted in nationally protected areas or areas of ecological significance.		upgrade equipment MTE MMS	of the relevant project intervention	
Risk of exacerbating gender and other intersectional vulnerabilities and/or inequality	<p>Gender equality and social inclusion (GESI) should be proactively considered, addressed and monitored at all stages of the project design and implementation.</p> <p>The Gender Action Plan (Annex 4b) sets out actions for gender mainstreaming and to promote gender responsiveness throughout the project interventions.</p> <p>A full-time GESI Specialist / Officer will be responsible for mainstreaming gender throughout the project, assuring quality control, and facilitating a gender-responsive and, where possible, gender-transformative approach to project implementation.</p> <p>All project personnel (including national and international partners and consultants) and stakeholders should be familiar with the project Gender Assessment (Annex 4a) and Gender Action Plan (Annex 4b).</p>	Low	All project partners and stakeholders	Throughout project development and implementation	<p>USD 420,830 has been allocated for the implementation of cross-cutting GESI measures</p> <p>Additional measures to promote GESI are included within the budget for relevant activities</p>
Risk of Sexual Exploitation, Abuse and Harassment (SEAH)	Risks can be mitigated by ensuring strict enforcement of UNEP's	Low	All project partners and stakeholders	Throughout project development and implementation	USD 3,000 has been allocated to support roll-out of the GRM, including sensitisation

With all projects, there are residual SEAH risks that must be considered.	<p>SEAH policies⁶⁷ and the GCF <i>Revised policy on the prevention and protection from SEAH</i> (2021).</p> <p>The GRM (see Section 7) provides information on how allegations of gender-based violence and SEAH should be managed.</p> <p>All project personnel and stakeholders should be sensitised on SEAH safeguarding and the requirement to ensure a gender-responsive and survivor-centred approach.</p>				and training of key staff and local stakeholders
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⁶⁷ UNEP, 2024. Prevention and Response to Sexual Misconduct. Available at: <https://www.unep.org/about-un-environment-programme/policies-and-strategies/prevention-and-response-sexual-misconduct> (Accessed: 4 December 2024)

7 GRIEVANCE REDRESS MECHANISM

7.1 Project-level Grievance Redress Mechanism

The Grievance Redress Mechanism (GRM) outlined below is a recommendation from an international expert consultant on gender and other social and environmental safeguards. The GRM is subject to further refinement during the initial period of project implementation by the GCF National Designated Authority for Maldives and national Executing Entity for the TRACT project, *i.e.*, the Ministry of Tourism and Environment (MTE). UNEP, as the Accredited Entity (AE), will ensure that the project-level GRM complies with GCF policy requirement.

7.1.1 Introduction

The GRM is the primary mechanism for addressing grievances under the TRACT project. It is intended to facilitate reports primarily from community stakeholders pertaining to the impacts of activities of the TRACT project. It provides for anonymous feedback to lodge complaints, concerns, or receive referral support if that is required by a particular situation, for example with incidence of reported gender-based violence (GBV) or Sexual Abuse, Exploitation and Harassment (SEAH).

The GRM intends to provide a secure, transparent and trustworthy process for receiving complaints and responding accordingly. It is intended to provide a process for facilitating solutions, answers to concerns, and support for those who may have been negatively impacted.

Further, when detailed GRM records are kept, the GRM process facilitates Monitoring and Evaluation (M&E) of the project and provides information that may be used to monitor the changing profile of risks and an awareness of new risks and response actions as they present themselves. Such issues should be reviewed by the project M&E Officer and the M&E International Specialist, rather than the Gender Equality and Social Inclusion (GESI) Officer or focal point. The latter is responsible for proper record keeping, ensuring that those M&E activities can be undertaken automatically.

Considerations for the GRM

Grievance redress is a formal process. Therefore, how, where and to whom a complaint can be made must be standard guidance procedures, to ensure transparency and accountability, as well as monitoring and evaluation. The guidance procedures must be published and advertised and be made known to all relevant stakeholders.

The GRM should be accessible to all users by having the GRM be accepted in any language to allow persons the comfort and ability to express themselves most accurately in the language they feel most proficient and comfortable. Beyond language, access considerations must include multiple channels for submission of complaints, that is, in electronic format by use of telephones, computers and other electronic devices, a hotline, in writing (with clear information on where complaint forms can be picked up and submitted upon completion, or in person (where the report is recorded by a GRM team member).

7.1.2 Scope and Function of the GRM

The GRM is a mechanism not an institution. Its role is to support the transparent and appropriate management of complaints and grievances directly related to the project. Moreover, the GRM is in compliance with relevant GCF's policies and requirement.

The GRM is linked to the Gender Action Plan (Annex 4b) and is an offshoot of that plan and vice-versa as it speaks to how specific gender and social risks will be handled. It is also an element of the Stakeholder Engagement Plan (Annex 13) and is one mechanism for facilitating feedback from stakeholders and beneficiaries. The GRM is a tool for beneficiaries to participate in the procedural governance of the project and to ensure that feedback also generates new data and information that inform project implementation.

GRM records should be accurately and fully maintained to facilitate the gathering of detailed information that can be used for monitoring and reporting. In keeping adequate records of grievances received and responded to, reports may be developed to review how the GRM has been utilised and implemented throughout the project.

The GRM is therefore designed to respond to risks identified under the project, and to facilitate the reporting of, not limited to, situations that may include any of the following, occurring within the context of the project:

- Dissatisfaction with the project and the benefits gained
- Community health, safety and security risks being generated or enabled by the project
- Concerns related to other social aspects of the project including stakeholder engagement
- Allegations of GBV and/or SEAH.

Complaints can be lodged against the project in general, specific agencies and actors and their staff, against consultants/consulting companies, as well as third-party contractors.

The GRM **is not** the vehicle to raise budget concerns by project partners, for example, and cannot address issues relating to other projects of the Ministry of Climate Change, Environment and Energy or other national actors. Those kinds of concerns would be made directly to the project team, and to and through the Project Steering Committee.

The GRM **is**:

- A two-tiered complaints procedure, with an emphasis on procedural justice, i.e. procedures that are just and enabling of a fair hearing for all sides.
- Reflective of considerations related to stakeholder engagement, gender equality and women's empowerment, social and environmental safeguards, as well as norms such as access to information.
- Both process and conduct-related requirements, particularly for social, GBV and SEAH. The process relies on the appropriate conduct of those receiving, processing and responding to the complaint including managing the inevitability of unconscious bias and discrimination.
- Sensitive on and to Sharia Law.
- Consistent with existing practice in the Maldives while meeting the requirements of UNEP and the GCF. The GRM will refer to these relevant policies including the following policies (informed by broader UN practice):
 - [Prevention and Response to Sexual Misconduct \(unep.org\)](https://www.unep.org/unep/sexual-misconduct) and [Preventing Sexual Exploitation and Abuse \(un.org\)](https://www.un.org/en/peacekeeping/sexual-exploitation-abuse/)
 - [Protection from Sexual Exploitation and Abuse \(interagencystandingcommittee.org\)](https://www.un.org/en/peacekeeping/sexual-exploitation-abuse/)
 - [UNEP Economic and Social Sustainability Framework](#)
 - [UNEP Gender Equality and the Environment Policy and Strategy](#)
 - [UNEP Partnership Policy and Procedures](#)
 - [UNEP Access to Information Policy](#)
- Complemented by capacity building across project partners – national leads and technical partners as well as with local stakeholders
- Supported by the project communications strategy⁶⁸
- Enhanced by a knowledge management strategy⁶⁹ – the GRM should be informed by case studies, experiences and reports as part of a commitment to ongoing learning from within and without the project.
- Conduct and behaviour-focused in terms of what triggers the GRM into action.

Complaints can be made in writing, via a form which will be on the project and/or MTE website, via WhatsApp and social media (in a direct message) as well as via phone. A hotline is proposed that will require further review by the key agencies. A phone/phone call option is proposed given that 1) persons may call to get clarity before submitting a formal complaint including how best to describe their complaint; and 2) persons may prefer speaking to writing and be more comfortable elaborating in that medium as compared to a written document (culturally this is known to be an issue in many settings).

⁶⁸ The Project Management Unit (PMU) will be responsible for developing a project communications strategy during Year 1 of the project implementation.

⁶⁹ The PMU will be responsible for developing a knowledge management strategy during Year 1 of the project implementation.

7.1.3 Governance Structure

The GRM is a process and not to be overly elaborate administratively to manage, nor overly complex that any stakeholder cannot use it and understand. A simple governance structure is thus proposed.

There are three main roles, and the roles have been kept simple and limited also to avoid conflict of interest between those receiving complaints and those that may be the subject of complaints. Thus, it is expected that the case manager/focal point is someone not directly involved in project implementation but has some knowledge of the project.

The three roles are: Focal Point/Case Manager, Redress Committee, and HR Department/Focal Point. Table 6 further elaborates on the expected roles and responsibilities of each role and where they also intersect.

Table 6. Roles and functions for the recommended project-level Grievance Redress Mechanism

Role	Agency	Function
Focal Point/Case Manager <i>For general and HR-related complaints</i>	MTE/MMS	<ul style="list-style-type: none"> Receive complaints Convene sittings of the GRM Review Committee Records of complaints received and resolution
Focal Point/Case Manager <i>For social and GBV/SEAH complaints</i>	Project Gender Specialist	<ul style="list-style-type: none"> Receive Social and GBV/SEAH complaints Convenes sittings of the GRM Review Committee Records of complaints received and resolution
Redress Committee	<ul style="list-style-type: none"> Ministry of Social and Family Development (MSFD) Maldivian Red Crescent Island Council Representatives Women's Development Committee Representatives Representative from an NGO for persons with disabilities (PWDs) UNEP 	<ul style="list-style-type: none"> Review complaints Set hearings with aggrieved party or parties Review evidence Conduct any necessary research and investigation Provide redress to aggrieved parties Complete reports of meeting (indicating resolution or referral) Compile data of reports Sign-off on closure of case
HR Department and/or project-related HR Focal Points	Various – Depends on the agency mentioned in the complaint or the agency that might have contracted a consultant or a company accused of wrongdoing.	<ul style="list-style-type: none"> Review complaint Apply HR policy and conduct investigation or ensure one is carried out Ensure the alleged perpetrator is aware of rights including representation Make findings and recommend disciplinary action that is then approved by management [This may differ between government, statutory, private and NGO actors in terms of policies] Reports on findings and case resolution to case manager Makes report to police, if warranted, for further legal action

The Focal Point/Case Manager role is divided into two: 1) for general and HR-related complaints; and 2) for social and GBV/SEAH complaints. All HR-related complaints are passed on the HR departments of

the respective agencies in a form that respects confidentiality and the safety of the complainant. The expectations of HR actors are expected to be in keeping with corporate policies for sexual harassment as well as disciplinary policies.

Membership of the Redress Committee is deliberately diverse, involving actors with social, gender, GBV and SEAH experience, as well as local actors to ensure that localised issues can be informed by experience and knowledge. The role of UNEP is an advisory one and to ensure compliance with UNEP and GCF guidelines as well as to seek guidance, if necessary, as the Committee reviews and resolves the case.

The terms of reference (TOR) for the Committee will be developed during Year 1 of the project implementation and would be approved upon the convening of the Committee. Members of the Committee should not be directly related to project implementation to avoid overt conflicts of interest and should commit to acting impartiality in this role if accepted. Any explicit or implicit conflict of interest should be declared with respect of any specific case that may be lodged for the review of the Committee.

Bias, discrimination and prejudice against specific types of complainants and or complaints are to be avoided and mitigated against using a self-declaration form. All members of the Committee will also sign confidentiality agreements. Where feasible, training and capacity building will be provided to the members of the Committee to support them in playing their role, including on bias, discrimination and prejudice. Similarly, case managers and focal points should be trained to avoid bias, discrimination and prejudice in the review and acceptance of complaints. Maldives is relatively small, and it is expected that persons may know each other.

Any concerns about Focal Points/Case Managers and Committee members are to be made directly to MTE and to UNEP as soon as possible with as much specific information about the concern or the conduct as possible.

7.1.4 Procedures for Filing and Resolving a Complaint

The GRM process takes place in four main stages (see Figure 1). The pre-stage is key to ensuring access and understanding for the proper functioning of the GRM. Stage 4 is only triggered and relevant if a complaint is not resolved, thus requiring mediation and possible involvement of UNEP and/or the GCF. Stages 1-3 are the critical ones, assuming that things go smoothly and there is no need for mediation and/or escalation to UNEP or the GCF.



Figure 1. Flowchart representing the four stages of the procedure

The stages of the GRM process are discussed below.

Pre-Stage – Access to the GRM

At this stage, community members and relevant project staff are made aware of the GRM, its uses, and are provided with information on where GRM forms can be accessed and filled out. This is also the stage where a grievance may be identified that is relevant. Based on the type of concern and that it matches the concern, a complaint may be made.

Stage 1 – Grievance Reported

At this stage, following an incident or based on a perceived risk of concern, the complaint form is completed and submitted. Upon submission, it is reviewed by the Focal Point/Case Manager and reviewed. Given the context of Sharia Law, consideration may need to be given to the fact that cases presented by women will need to be received, managed and responded to by women.

In filing a complaint, persons (potential complainant or grievant) are encouraged to provide as detailed as complete information as possible particularly if a specific incident occurred. Details on the location, date and time of an incident help in tracking down relevant information and investigating a complaint.

Submissions may be anonymous, but this will hinder follow-up and direct reporting to the complainant. Only a general notice of resolution could be made to meet with confidentiality requirements.

All information received is to be kept confidential to protect the safety of the complainant/grievant and to avoid causing potential further harm. Complaints may be anonymised by the Focal Point/Case Manager before passing them on to the Redress Committee.

Stage 2 – Grievance Reviewed and Investigated

The case is reviewed for compliance with the GRM scope and role and then a case number is provided, and it is officially lodged. The Focal Point/Case Manager informs the complainant within five working days of receipt of the complaint/grievance, acknowledging the complaint and its acceptance. The case is then referred to officially to the Redress Committee for investigation. If the complaint is deemed to be an HR case, then it is referred to the HR department(s) of the relevant agency(ies) for further action.

The Focal Point/Case Manager is responsible for tracking the case and working with the Redress Committee to resolve cases within 30 working days unless the situation is pressing and urgent. If a case is urgent and pressing it can be fast-tracked, but this will still rely on the collection of evidence.

Tracking is conducted via the case number (not the name of the complainant, given that a complainant may have more than one complaint or grievance at one time).

Investigations can involve interviews with the complainant and alleged offender(s), as well as eyewitnesses and other parties.

Stage 3 – Grievance Resolved or Referred

At this stage, resolutions are identified and agreed upon, with instructions on appropriate follow up actions to be taken. If referral pathways for more elevated or serious incidents (i.e. GBV or SEAH) are required, these are addressed and provided at this stage. Every effort should be made to ensure that records are kept and filed to enable reporting of the GRM and support monitoring and evaluation of the mechanism.

Table 7. Outline of each stage of the GRM procedure

Pre-Stage: Access to GRN	Stage 1: Grievance Reported	Stage 2: Grievance Reviewed and Investigated	Stage 3: Grievance Resolved or Referred
Internal and external stakeholders are made aware of the GRM and its uses/purpose.	Formal complaint is made via any of the prescribed channels.	Receives and reviews the complaint(s) prior to the sitting of the Redress Committee.	Provide update/feedback to stakeholders through Case Manager.
Stakeholders know how to access the GRM and all channels for submission of complaints.	Where in-person complaints are made, the Focal Point/Case Manager must use the standard complaint form to ensure that all relevant details are captured. Cases not relevant to GRM are referred to other parties and the complainant is informed accordingly.	Complaint is reviewed for compliance. Case is assigned a number and anonymised in terms of names and other identifying information. Case is acknowledged within 5 days of filing and a timeline for a solution also provided.	Facilitate parties in discussion towards a resolution. If a resolution is met, all parties must receive the agreement in writing. Lack of agreement may mean a referral (<i>referral may also be necessary in the case of GBV/SEAH for this to be adequately addressed</i>).

	Complaint is recorded and formally acknowledged.	<p>Formally invites complainant and alleged offending party (in writing for M&E purposes) to sitting of the Committee.</p> <p>Gathers any additional information from the complainant and allows offending party to respond (<i>consideration must be given here to risk to the complainant, and therefore initial hearing may not include alleged offender if the Committee feels it puts the complainant at risk</i>).</p> <p>If additional information from a third party or project documents or any information from any other source is needed at this stage, parties are so informed.</p> <p>Interview with a third party, review of necessary documents, etc.</p> <p>Schedule follow-up sitting and invite relevant stakeholders.</p>	<p>Provide relevant parties with agreed resolution for sign off (<i>each party can be provided with a signed copy</i>).</p> <p>In case of referral, provide relevant parties with referral letters.</p> <p>Complete a full report of the proceedings.</p> <p>Insert relevant information into M&E database (type of complaint, date of sittings, resolution/referral, etc.)</p>
	Sitting of Redress Committee is convened (or in the case of standard sittings, the complaint is put on the agenda of the next available meeting).	Committee makes a decision and communicates this to the Case Manager.	<p>Committee is informed if the resolution has been accepted. If accepted, case is closed and the record completed.</p> <p>If not accepted, mediation is proposed, or the matter is escalated to UNEP and/or GCF.</p>

As much as possible, convening of sittings and provision of responses to any complaint or concern should be done as efficiently and as quickly as possible. Too much time lag may lead to mistrust of the people and/or the process. In addition, delays in dealing with complaints or concerns can increase the risk of negative impacts on the project, the complainant, or the community, all of which can affect project outcomes. Written notices serve as evidence of process, accountability, and transparency, as well as become part of the M&E record.

The Redress Committee must be guided by a TOR, as well as clear guidance procedures from receipt of complaints to resolution. It may also be useful for the members of the Committee to sign confidentiality agreements to ensure accountability. The TOR, guidance procedures and confidentiality agreement serves as the foundational documents for the Committee and its operations.

7.1.5 Special Cases: Gender-Based Violence (GBV) and Sexual Exploitation, Abuse and Harassment (SEAH)

Complaints regarding GBV or SEAH (in relation to the project) should not be normally handled in the same process of mediation as may be useful in addressing other forms of complaints. These cases will be handled by the project-hired Social and Gender Safeguards (SGS) Specialist who follows a similar routine as for general cases but with an emphasis on anonymisation and even more attention to confidentiality. Responding to risks identified under the project, the processes are expected to follow a victim- or survivor-centred approach. If the situation is urgent and pressing, the case will be fast-tracked to be solved before the 30 working days term.

The SGS Specialist will be responsible for defining the mechanisms and timelines for filing and resolving urgent and pressing complaints regarding SEAH and GBV. The definition and implementation of comprehensive mechanisms for SEAH and GBV complaints will be amongst the first priorities of the SGS Specialist.

7.1.6 Receiving Complaints

Complaints may originate from the victim or any witnesses, including bystanders or staff, who have a duty to report any allegation of GBV/SEAH, of which they are aware under the Code of Conduct while on duty. The following considerations must be addressed during the process of receiving complaints:

- Assisting and protecting complainants and their safety (both physical and psychological/emotional) must be prioritised during the intake process.
- The complainant is under no obligation to answer every question and may choose to stop providing answers to questions at any point.
- Complaints should be recorded by the Focal Point/Case Manager and, depending on the case, be referred immediately to MSFD and/or the Police for further action.
- Complaint records must be stored in locked or password-protected locations.

Important: Contact details of the Focal Point/Case Manager handling complaints should be easily accessible to all communities impacted by the operations.

7.1.7 Referral Pathways

Referrals to in-country assistance should be available through MSFD and relevant GBV networks. Contact details of the Focal Point/Case Manager handling complaints should be easily accessible to all communities impacted by the operations. The Focal Point/Case Manager will be responsible for contacting relevant qualified personnel.

All victims of GBV/SEAH should receive a needs assessment as soon as possible by qualified personnel. At the time of intake, an assessment of the victim's health, security and psychosocial, economic, and legal needs should be conducted by a trained protection expert to make a referral to the relevant victim-assistance, GBV or protection services.

Where the complainant is not the victim, the Focal Point/Case Manager has oversight responsibility for ensuring that the appropriate victim-support services are discretely contacted in a timely manner, subject to the victim's wishes and safety.

7.1.8 Additional Considerations for the GRM

Additional considerations to ensure successful operation of the GRM are outlined below:

- Prior to the project starting, information should be gathered regarding which specific referral agencies are available to support, noting their hours of operation, emergency service support (that may be accessed outside of normal working hours), contact details and availability of referral support workers.
- Project staff should consider the best way to provide information on the GRM and associated referral pathways for any type of incident.

- Outside of the referral supports available, it should also be considered if there any known gaps that could arise and what options are available to mitigate these concerns.
- The language that the complainant is most comfortable communicating in, is also important.

7.1.9 Grievance/Complaint Form

The Grievance/Complaint Form (see Table 8) is designed to facilitate reporting on, and submission of complaints/grievances related to project activities under the TRACT project. The form is presented here in English but should also be made available in Dhivehi.

If the complainant is a migrant or migrant worker, translation services may be needed to facilitate the complaint being properly documented and submitted. The form itself should be available in as many languages as possible (AI may be able to facilitate this and reduce the cost).

Table 8. Proposed Grievance / Complaint Form

GRM Complaints Form			
Complainant's Information			
Name			
Address			
Telephone No.		Email	
Description of the complaint (to include the offending action in as much detail as possible)			
Location (of possible incident)			
Date (when incident occurred, or risk or concern observed)		Time (when incident occurred, or risk or concern observed)	
Information of the (alleged) offending party (Agency / Individual)			
Name			
Address			
Telephone No.		Email	
Other information			
Eyewitness(es)			
Name			
Telephone No.			
Supporting documents or evidence			
Document e.g. Eyewitness statement (upload here)			
Photograph (upload here)			
Video (upload here)			
Soil/Water sample (to be submitted to the MTE within 5 days of submission of a complaint)			
Date of Submission			
Signature of Complainant			

For Official Use Only			
Receiving Officer			
Name			
Official Title/Role			
Date of Receipt of complaint			
Type of Complaint:			
Signature			
If accepted – what number is assigned and how case name for anonymisation processes			

In an electronic format, the form can have drop-down boxes and expandable text boxes to facilitate details (with a word count if necessary). Electronic submissions, once completed properly, should provide an immediate response on whether the submission was received within the system.

This is prior to the Receiving Officer (the Focal Point/Case Manager) signing off, assigning a case number and a name, and submitting to the Redress Committee. While the Committee reviews, the Case Manager should have sent an acknowledgement and acceptance notice to the complainant via email (as per guidance in *“Procedures for Filing and Resolving a Complaint”*).

The timing of this process is relevant for M&E, allowing for the assessment of any time lapse between receipt of complaint and response from the Redress Committee. It then becomes the responsibility of the Redress Committee to adjust the timeline for responding and addressing the complaint.

If the complainant is a migrant or migrant worker, translation services may be needed to facilitate the complaint being properly documented and submitted.

7.1.10 Monitoring and Evaluation

It is important that the staff member responsible for addressing and responding to complaints made using the GRM agrees to what is needed for M&E purposes and provides summary information on the GRM (number of cases, gender and age disaggregation, status – i.e., pending or resolved or escalated, and final resolution) on an agreed schedule.

Monitoring of the GRM is an ongoing collection of relevant documentation that includes:

- Number and status of cases; and
- Reports on any capacity building that support the use and operation of the GRM.

The monitoring of GRM is one of the key responsibilities of the M&E Officer and the M&E International Specialist, who will be engaged by the national EE in Year 1 of project implementation. Details regarding the tracking will be defined by the M&E Officer and M&E International Specialist in consultation with the PMU and UNEP. The M&E Officer and M&E International Specialist will be working closely with the PMU, and the regular PMU reports to UNEP will include information regarding GRM as tracked by the M&E Officer and International Specialist. As mentioned in section 7.1.5, complains regarding GBV or SEAH will be handled by the project-hired Social and Gender Safeguards (SGS) Specialist, following a similar procedure as for general cases but with an emphasis on anonymisation and even more attention to confidentiality.

As previously outlined, ensuring that GRM forms are completed accurately and with as much detail as possible can help provide better data for which reporting can be completed, which can then inform risk analysis. Records are expected to be maintained on:

- Number and type of grievances received in any given year as well as overall for the life of the project;
- Sex- and age-disaggregated information on users (if available and or provided);
- Vulnerability status of users;
- Responses, including course of action taken, time taken to respond, or reason for not responding (reports from HR departments will form part of this information);
- Referrals made, where applicable, for example in cases of GBV or SEAH;
- Additional follow-up actions taken, when required.

Ensuring the secure as well as accurate filing and maintaining of records related to the GRM enables of access to information when reporting is required and facilitates the accumulation of data as well as analysis of trends. The analysis of this information by the M&E Officer and the supporting M&E International Specialist can also inform or trigger the changing profile of some environmental and social safeguarding risks, as well as responses to those risks based on project implementation.

7.1.11 Communications related to the GRM

Communication for the GRM must be included in the overall communication strategy for the project⁷⁰ and can be developed with support from the Gender Specialist.

The most critical issue for the GRM is that there is enough public awareness around the GRM and its process to facilitate its use. Related communications include infomercials as well as specific outreach and sensitisation to actors on the ground. Ensuring that local counterparts are trained on the GRM also facilitates accurate and timely information. Concerns about potential risks based on existing behaviour or given structural issues in society may also be considered where the risk exists (particularly in relation to gender inequality). This means that the project team itself as well as project partners should be regularly engaged on related risks, as well as on GBV/SEAH.⁷¹ People will change, lessons will be learned, and circumstances will arise that need to be integrated on an ongoing basis into internal and external communications and stakeholder engagement.

As there is with any gendered form of communications, there are some ‘Dos and Don’ts’ for gender-sensitive communications around the GRM and its use. These are outlined in Table 9 below.

Table 9. Dos and Don’ts for gender-sensitive communication

Dos	Don’ts
Promote gender-sensitive/responsive language	Use gender-biased terms
Choose images wisely to portray women and men as equals and in non-traditional roles	Choose images that show any group/individual being inferior to any other
Avoid bias and stereotypes in comments made by your spokespersons	Perpetuate prejudice with generalised statements like “men are from Mars and women are from Venus”
Choose an ambassador or spokesperson who is trained in gender-sensitive engagement	Be partial in your choice of speakers e.g. ask female executives/leaders to talk on work-life and male executives/leaders on sports facilities
Engage diverse groups to ensure comprehensive feedback for ongoing consultation/work	Underestimate the importance of engaging children and young people

⁷⁰ The Project Management Unit (PMU) will be responsible for developing a project communications strategy during Year 1 of the project implementation.

⁷¹ Project personnel and partners should be engaged on risks at least once per year

The GRM is an important element of the Stakeholder Engagement Plan (Annex 13), providing project stakeholders and beneficiaries with a space to air concerns and thus inform and reshape project approaches as necessary. Ongoing communications on the GRM will be important throughout the lifespan of the project.

It also cannot be assumed that partners understand the nuance of all complaints, including those related to socio-cultural issues, as well as GBV/SEAH. This is usually undervalued and undercounted. Training and sensitisation on gender, GBV/SEAH, and gender-sensitive communications is proposed as a specific activity in the Gender Action Plan (Annex 4b) and is part of a gender-sensitive approach to budgeting.

7.2 UNEP Stakeholder Response Mechanism

As part of UNEP's Environmental and Social Sustainability Framework (ESSF),⁷² stakeholders who may be adversely affected by the project can communicate their concerns about the environmental and social performance of the project through various entry points. Local grievance redress processes and mechanisms are expected to be the first point of contact for stakeholders who may be adversely affected by a UNEP project. However, if such concerns are not resolved at the local level, stakeholders may access UNEP's Stakeholder Response Mechanism (SRM).

UNEP's SRM provides the opportunity for affected people to seek either compliance review or dispute resolution regarding activities that UNEP implements or executes as part of its projects and programmes. The SRM serves as a complementary mechanism to local Grievance Redress Mechanism established for the project (see Section 7.1).

The operating procedures for UNEP's SRM are established through the Independent Office for Stakeholder Safeguard-related Response (IOSSR).⁷³ The IOSSR serves two functions:

1. Compliance Review: Process for responding to claims by Stakeholders alleging that UNEP activities are not in compliance with the ESSF.
2. Grievance Redress: Provides access to dispute resolution mechanisms used to address project-related disputes that relate to UNEP's activities.

The IOSSR is responsible for the operation of the SRM, and thus fulfils the following responsibilities:

- Receives and screens complaints for eligibility.
- Maintains a roster of accredited independent experts related to compliance review and dispute resolution.
- Develops the appropriate terms of reference for facilitating the compliance review or dispute resolution.
- Manages and oversees all experts engaged in compliance review and dispute resolution.
- Maintains the IOSSR website that provides the public with access to all relevant documents related to compliance review and dispute resolution.
- Issues reports to the UNEP Executive Director with findings and recommendations for compliance reviews, and outcomes for dispute resolution processes.
- Monitors the implementation of decisions related to compliance review and grievance redress.
- Reports on the IOSSR operations and provides advice based on lessons learned.
- Conducts outreach to Stakeholders regarding the IOSSR.
- Seeks to minimise risks of retaliation to complainants.

Complaints can be filed to the SRM through the [online project concern form](#), email (unep-iossr@un.org) or mail to the following address:

Independent Office for Stakeholder Safeguard-related Response (IOSSR) &

⁷² UNEP, 2020. Environmental and Social Sustainability Framework

⁷³ United National Environment Programme, 2020. UNEP's Environmental and Social Sustainability: Stakeholder Response Mechanism (2020), Available at: <https://wedocs.unep.org/bitstream/handle/20.500.11822/32023/ESSFRM.pdf>. (Accessed: 26 June 2024)

Director of Corporate Services Division
United Nations Environment Programme
P.O. Box 30552, 00100
Nairobi, Kenya

Within 10 business days of receiving a complaint, the IOSSR will acknowledge receipt of the complaint to the complainant and register the complaint in the IOSSR's Public Registry.

Within 30 business days of receiving a complaint, the IOSSR shall determine whether the complaint is eligible for compliance review, dispute resolution, or both, and inform the complainant. Detailed information regarding the pathways for compliance review and dispute resolution are provided in UNEP's *Operational details on the Stakeholder Response Mechanism*.

If at any time after receiving a complaint the IOSSR believes significant, irreversible harm to the complainant(s) or other affected people may be imminent, the IOSSR Head may recommend to the UNEP Executive Director that interim measures are taken pending completion of the compliance review or dispute resolution processes to address the imminent harm.

7.3 GCF Independent Redress Mechanism

The GCF's Independent Redress Mechanism (IRM)⁷⁴ addresses complaints and grievances from people who believe they have, or will be, negatively affected by projects or programmes funded by GCF. Stakeholders will be made aware of the IRM through outreach efforts under various sub-activities.⁷⁵ The IRM provides recourse to affected people in a way that is fair, effective and transparent, and enhances the performance of GCF and its projects and programmes. The IRM operates independently of the GCF Secretariat and reports directly to the GCF Board.

The IRM offers several processes for addressing the issues raised in requests or complaints:

1. Problem solving: Process of addressing specific issues that have given rise to the request or complaint, and to help identify and agree on solutions that meet the interests of relevant parties.
2. Compliance: Process of determining whether any GCF policies or procedures have been violated and, if so, make recommendations on how redress or remedy should be provided.

The IRM addresses complaints from stakeholder who are, or may potentially be, adversely impacted by GCF projects or programmes. After verifying eligibility, the IRM engages with the relevant parties to explore options for resolving the complaint with the aim to reach a mutually satisfactory outcome. The goal of this problem-solving process is to address specific issues that have given rise to the complaint, and to help identify solutions that meet the interests of the relevant parties. Usually this involves clarifying the issues of concerns, understanding the needs and interests of stakeholders, assisting parties in identifying solutions, and helping them reach an agreement regarding the terms of these solutions.

Complaints can be filed to the IRM through the online form, email (irm@gcfund.org) or mail to the following address:

Independent Redress Mechanism
Green Climate Fund
Songdo Business District
175 Art center-daero
Yeonsu-gu, Incheon 22004
Republic of Korea

If parties are unwilling or unable to resolve the issues, the IRM conducts a compliance appraisal to determine whether a compliance investigation is warranted, and if so, conducts an investigation to identify any non-compliance with GCF policies or procedures in relation to the complaint and recommends appropriate redress. The IRM has a mandate to monitor agreements by relevant parties to a problem-solving process or implementation of any ensuing redress or response of the GCF Secretariat, including

⁷⁴ GCF, 2020. Independent Redress Mechanism. Available at <https://irm.greenclimate.fund> (Accessed: 4 December 2024)

⁷⁵ The specific outreach efforts in which stakeholders will also be made aware of the IRM will be defined by the PMU during Year 1 of the project.

any corrective plans. IRM compliance investigations are independent of, but complementary to, GCF's procedures for ensuring project compliance.

The SRM is publicised to the Executing Entity, stakeholders, and the public via its publicly available website: <https://irm.greenclimate.fund/>. This includes information about the IRM's functions, how to file a complaint, the Case Register, publications, and other relevant resources.

8 IMPLEMENTATION ARRANGEMENTS

As outlined in the Environmental and Social Action Plan (Table 5), there are multiple entities and stakeholders with responsibility for ensuring that project-related environmental and social (E&S) risks are managed effectively. Each has distinct and complementary roles and responsibilities, as detailed below:

- **UNEP:** As the Accredited Entity (AE), UNEP is responsible for ensuring overall compliance with the GCF Revised Environmental and Social Policy (2021) and any required monitoring and reporting to the GCF. Limited EE functions will also be undertaken by UNEP. UNEP will execute the project in line with its programme manual and standard business procedures and will contract international consultants and Technical Partners to undertake activities. In regard to E&S safeguards, UNEP will maintain an oversight function. UNEP will draw on the overall expertise of its Gender and Safeguards Unit (GSU) in its Policy and Programme Division (PPD), as required. Additionally, UNEP is ultimately responsible for ensuring that the project is implemented in accordance with applicable national laws, regulations, and standards related to the management of E&S risks, as well as UNEP's Environmental and Social Sustainability Framework (2020). UNEP is responsible for monitoring and reporting to the GCF on the project's consistency with E&S safeguarding standards and the GCF Revised Environmental and Social Policy, based on the monitoring and reporting information provided by the Project Management Unit. UNEP will address compliance concerns and other grievances in a timely manner, through its Stakeholder Response Mechanism and as a member of the Redress Committee for the project-level Grievance Redress Mechanism.
- **Ministry of Tourism and Environment (MTE):** As the GCF National Designated Authority (NDA) for Maldives, MTE is responsible for providing strategic oversight of the project activities and communicating the national priorities, which should include consideration of E&S safeguards. As the national Executing Entity, MTE is responsible for implementing project activities in compliance with UNEP's Environmental and Social Sustainability Framework (ESSF) and the GCF Revised Environmental and Social Policy. In this context, MTE is required to continuously screen and monitor potential E&S risks and impacts due to the project activities and inform UNEP of any unforeseen risks that may arise, and which could potentially lead to the project not meeting the requirements set out in the ESSF. MTE is also required to provide written notice to UNEP of any complaints, claims, investigations or proceedings related to the E&S performance of the project.
- **Project Management Unit (PMU):** The PMU, hosted by Maldives Meteorological Service (MMS) in Male', Maldives, is responsible for ensuring that actions specified in safeguard management plans⁷⁶ are carried out, and for regular reporting on compliance with E&S requirements via progress reports. The Project Manager will have overall responsibility for E&S safeguard management at the PMU level. This responsibility and required expertise will be part of the Terms of Reference based on which the Project Manager will be recruited. Additionally, a Social and Gender Safeguard (SGS) Specialist will be engaged to monitor implementation of social safeguards, as well as address concerns relating to gender-based violence and/or sexual exploitation, abuse and harassment, should any arise. The PMU will assume liaison functions with national government entities and stakeholders and will coordinate with UNEP and Technical Partners throughout the project implementation and reporting, in line with their obligations under the respective legal instruments and will coordinate to ensure that reports are received. The PMU will consolidate all progress reports and financial management reports, including co-financing reports and annual audit reports, from the national EE and Technical Partners and submit these to the AE. The PMU will provide guidance and source expertise as needed on project management, financial management, procurement, and technical issues. It will establish contact with development partners working in Maldives to ensure that activities in related fields are complementary and to seek opportunities for collaboration. The PMU will also provide secretariat services to the Project Steering Committee (PSC).
The PMU will be composed of a Project Manager, a Project Assistant, a Budget Officer, a Climate Advocacy Officer, a Procurement Officer, and a Financial Liaison Officer in MTE.

⁷⁶ Relevant plans include the Environmental and Social Action Plan (Annex 12a), Gender Action Plan (Annex 4b), and Stakeholder Engagement Plan (Annex 13).

- **Project Steering Committee (PSC):** The PSC is responsible for the provision of high-level oversight and guidance towards achieving the project's objectives to the project team, including in relation to the project's E&S performance.

9 MONITORING AND EVALUATION

UNEP as the Accredited Entity will monitor and report to the GCF on the environmental and social (E&S) performance of the project, based on information provided by the Executing Entity and Technical Partners, which will be collated by the Project Management Unit (PMU).

The reporting requirements include Annual Performance Reports (APRs) and Mid-Term and Terminal Evaluation (MTE/TE) reports. These reports will inform on the project's consistency with E&S safeguard standards and with the GCF's Revised Environmental and Social Policy, as well as with any application E&S provisions under the legal agreement for the project. The TE will also assess long-term impacts of the project, if relevant, and provide lessons learned and recommendations that can be used to enhance the performance of future UNEP and/or GCF projects and programmes.

Day-to-day monitoring of the project implementation and E&S performance will be carried out by a dedicated Monitoring and Evaluation (M&E) Officer and a supporting M&E International Specialist, who will work in coordination with the PMU. The M&E Officer and the M&E International Specialist will be responsible for designing and implementing a performance M&E framework for the project, which will include monitoring of E&S risks and impacts. The PMU will inform UNEP of any difficulties in fulfilling E&S safeguard responsibilities, including the status of the grievance redress mechanism implementation and any sexual exploitation, abuse and/or harassment concerns, so that the appropriate support can be provided and corrective measures adopted in a timely manner.

The Project Steering Committee (PSC) will be responsible for the longer-term monitoring and evaluation of the project, including participating in the MTE process and developing a management response to the MTE's recommendations. The PSC will additionally receive periodic progress reports and will make recommendations if any revisions to the project's E&S safeguard arrangements are required.

10 INFORMATION DISCLOSURE, CONSULTATION AND PARTICIPATION

Disclosure of information is essential to ensure transparency and accountability in the project activities and enable stakeholders and the public at large to understand the risks, impacts, and opportunities associated with the project. Information disclosure will be undertaken in compliance with the GCF Information Disclosure Policy (2016), which requires that relevant information, including in relation to E&S issues, is made available to affected and potentially affected communities and external stakeholders. Following project approval by the GCF Board, project information and documents will be made available on the [GCF website](#) and [UNEP Open Data Portal](#) for public viewing.

Ensuring meaningful and inclusive stakeholder engagement is an integral part of the project. The depth of stakeholder engagement undertaken during the project development stage is detailed in the Summary of Stakeholder Consultations and Stakeholder Engagement Plan (Annex 13). This Annex also outlines a plan for stakeholder engagement during the project implementation stage, including how information will be disclosed and steps to be taken to ensure meaningful consultation and informed participation in a culturally appropriate and gender-responsive manner.

APPENDIX 1 – IFC EXCLUSION LIST

The IFC Exclusion List (2007)⁷⁷ defines the types of projects the IFC **does not** finance. These projects are listed below:

- Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements, or subject to international bans, such as pharmaceuticals, pesticides/herbicides, ozone depleting substances, PCB's⁷⁸, wildlife or products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).
- Production or trade in weapons and munitions.
- Production or trade in alcoholic beverages (excluding beer and wine).
- Production or trade in tobacco.
- Gambling, casinos and equivalent enterprises.
- Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where IFC considers the radioactive source to be trivial and/or adequately shielded.
- Production or trade in unbonded asbestos fibres. This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.
- Drift net fishing in the marine environment using nets in excess of 2.5 km. in length.

A reasonableness test will be applied when the activities of the project company would have a significant development impact, but circumstances of the country require adjustment to the Exclusion List.

⁷⁷ International Finance Corporation, 2007. IFC Exclusion List (2007). Available at: <https://www.ifc.org/en/what-we-do/sector-expertise/sustainability/ifc-exclusion-list-2007>. (Access: 27 June 2024)

⁷⁸ United Nations Environment Programme 2017. PCBs - a forgotten legacy. Available at: <https://www.unep.org/topics/chemicals-and-pollution-action/pollution-and-health/persistent-organic-pollutants-pops/pcbs>. (Access on: 24 June 2024)