STAKEHOLDER ENGAGEMENT PLAN

ACCELERATING RENEWABLE ENERGY INTEGRATION AND SUSTAINABLE ENERGY (ARISE) PROJECT (P172788)
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This Stakeholder Engagement Plan (SEP) prepared for Accelerating Renewable Energy Integration and Sustainable Energy (ARISE) project is developed to meet the requirements of Environmental Social Standard 10 (ESS10) Stakeholder Engagement and Information Disclosure under the World Bank’s Environmental and Social Framework (ESF).

The project is implemented by the Ministry of Environment and the implementation partners are the electricity service providers. The project is comprised of four components namely, Solar PV risk mitigation, Battery Energy Storage System (BESS), Grid modernization for variable renewable energy integration and Technical support.

During site selection for the solar PVs (i.e., Addu City, Fuvahmulah City, GDh. Thinaadhoo, B. Eydhafushi, Lh. Hinnarau and HDh. Kulhudhuhfushi), consultations were undertaken with the councils, and similar consultative exercise on SEP was undertaken with the councils and other key stakeholders, including STELCO, Fenaka Corporation, Ministry of Planning and Infrastructure, Ministry of Housing and Urban Development and Maldives Civil Aviation Authority. The main issues raised during these consultations include: limited land space in islands to undertake ground mounted solar PV installations; need to utilize spaces that can be of multiple use; and direct benefits to local communities due to the project.

To support continuous engagement with stakeholders during project implementation, the SEP describes the key stakeholders that are relevant to the project that were identified through a mapping exercise based on interest and influence. Accordingly, project affected parties and other interest parties were defined based on this mapping exercise. Roof/space owners, island and atoll council, electricity service provider, island community, electricity regulator and independent power producer were defined as project affected parties. Detailed measures to involve these parties are defined in SEP, and include continuous consultation with these parties in all stages of the project from site selection, project implementation to monitoring activities undertaken. A project steering committee is defined where important decisions regarding the project are made endorsed by this committee. This committee consists of representatives from the most important project affected parties. This ensures participation of such parties in decision making process.
Moreover, vulnerable groups that maybe impacted disproportionately have been identified as part of due diligence during project preparation. This include, women, minority groups, people who reside and use buildings, people disadvantaged due to profession and foreign construction labor. Special mechanisms to ensure the participation of such groups are defined in SEP. In addition, a Gender Action Plan (GAP) has been developed for the project based on consultations undertaken with the electricity service providers and NGOs working for women’s rights. The GAP for the project includes clear targets, quotas, gender design features and quantifiable performance indicators to ensure women’s participation and benefits during project implementation.

A feedback loop has been defined for the project to ensure that the stakeholders are informed on the ways in which their feedback was utilized in decision making. These include:

1. All meeting minutes will be shared and finalized based on the input of the respective stakeholder
2. Perception surveys will be undertaken with stakeholders to determine acceptability of project interventions and level to which concerns are addressed by the project.
3. Following perception surveys, a report will be compiled and publicly made available through the website of the ministry, island council, and Electricity service provider.

A detailed Grievance Redress Mechanism (GRM) for the project has also been defined in this SEP. The first tier of the mechanism is the site, the second tier is the council and the third tier is Ministry of Environment. This system was defined based on the experience from previous energy projects implemented in the Maldives. Information on GRM is required to be displayed at the site, at the council, at the electricity service provider office and on the website of ministry, council and the electricity service provider.
INTRODUCTION AND PROJECT BACKGROUND

This stakeholder engagement plan (SEP) is developed for Accelerating Renewable Energy Integration and Sustainable Energy (ARISE) Project funded by the World Bank and implemented by the Government of Maldives. On behalf of the government, the project is being implemented by Ministry of Environment. Implementation partners for the project are the Electricity Service Providers, which at the moment are Fenaka Corporation Limited and State Electric Company (STELCO). The project is comprised of the following key components:

Component 1: Solar PV risk mitigation (US$24.8 million IDA Guarantee and US$6.2 million IDA Grant) – This component will provide risk mitigation packages to private sector Independent Power Producers (IPPs) to cover off taker risks. This component is expected to cover 36 MW of solar installation through a number of phases through various geographic localities across Maldives. The indicative plan involves installation of 11 MW ground mounted Solar PV in Addu City, Fuvahmulah City, GDh. Thinadhoo, B. Eydhafushi, Lh. Hinnavaru and HDh. Kulhudhufushi and installation of 10 MW floating solar in Addu city, which are currently in the prequalification stage. Installation of 7 MW rooftop, ground mounted structures in Laamu is under development, and subsequent pipeline is under identification in various locations across Maldives.

Component 2: Battery Energy Storage System (BESS) (USD 25 million CTF Loan) – This component will support deployment of BESS system in some islands to enable high penetration of solar PV. This addresses challenges posed of rapidly integrating variable energy to existing grids. The Component targets to support about 50 MWh of BESS in the selected grid systems, subject to market price trends.

Component 3: Grid Modernization for VRE integration (US$2 million CTF Loan and up to approx. US$25 million from other IFI co-financing) - This component will support grid upgrades and reinforcement to accommodate an increasing volume of renewable energy and BESS, especially for longer duration, in selected grid systems. The main scope will include strengthening network capacity, deploying supervisory control and data acquisition (SCADA) systems and optimizing interactions among renewable energy generation, BESS and existing conventional power plants.
Component 4: Technical Support (USD 3 million of CTF Grant) – This component provides technical assistance on the following key areas:

1. Institutional Capacity Building (Utility, ME and other energy producers)
2. Pipeline Developments (Feasibility studies and other relevant studies)
3. Other Sustainable Energy Developments
4. Project management and implementation plan

This stakeholder engagement plan is developed to meet the requirement of paragraph 13 of Environmental Social Standard 10 (ESS10) Stakeholder Engagement and Information Disclosure of the World Bank’s Environmental and Social Framework (ESF).

The plan will cover the following key aspects: Brief summary of regulations and requirements under World Bank’s ESF and national regulations, brief of the stakeholder engagement activities undertaken during project preparation, stakeholder identification through stakeholder mapping, proposed stakeholder engagement plan, proposed grievance redress mechanism, and monitoring and reporting details.
As highlighted in the section above, under component 1, to install 11MW ground mounted solar PV and 10 MW floating solar PV through IPP model is already in the prequalification stage. Work was commenced for this component through Accelerating Sustainable Private Investment in Renewable Energy (ASPIRE) project under which one subproject was successfully implemented and one subproject is on the way through IPP model. A number of activities have been undertaken to secure space for the proposed project. In this regard, consultations have been undertaken with space owners, which in most cases are the respective councils. To this end, the following councils have been consulted:

1. Addu City Council
2. Thinadhoo Council
3. Eydhafushi Council
4. Hinnavaru Council
5. Kulhudhufushi Council

Overall, all the councils were very keen and were willing to support the project. The commitment to undertake the project was provided by the councils by signing a Memorandum of Understanding (MOU) with the Ministry (Annex 1).

Other than the councils, the other main party that was consulted during the preparatory works are regional airports and Maldives Civil Aviation Authority, as both Fuvahmulah airport and Kulhudhufusuhi airport were selected as locations to undertake the project. The main condition of these stakeholders is to undertake glare assessments at both Fuvahmulah and Kulhudhufushi from a safety aspect prior to undertaking the project at these locations. Initial glare assessment have been undertaken and the locations have been identified as viable. MOU has been signed with Regional Airports. Moreover, technical discussions were held with the energy service providers Stelco and Fenaka to determine the technical feasibility of the project through a number of meetings.

In addition, a consultative meeting with the aim of providing information and feedback on this Stakeholder Engagement Plan, Environment and Social Management Framework and Labour Management Procedures were undertaken on 20th February 2020. Parties invited to
consultation include; STELCO, FENAKA, island councils of the selected islands for the project, Ministry of National Planning and Infrastructure, Ministry of Housing, Civil Aviation Authority, Regional Airports, Maldives Energy Authority, Ministry of Finance and prominent environmental NGOs. Except regional airports and environmental NGOs all other parties participated in the consultations (Annex 2).

Overall, the main aspects highlighted during these consultations can be summarized as follows:

- Limited land space in islands to undertake ground mounted solar PV installations.
- Need to utilize space that can be of multiple use. This includes sides of road, parking spaces, locations near harbours which can be utilized for market space etc.
- Direct benefits to the community by undertaking the proposed project.

With regards to the councils, the main issue raised is related to direct benefits to the community in terms of electricity price reductions. It was highlighted by ME that as electricity is highly subsidized and since electricity is provided through a common tariff for all the islands, this is highly unlikely during the project implementation period. However, ME suggested that reduction in fuel subsidies mean that funds are available in the central budget for other development activities including schools, hospitals etc.

Moreover, the need to involve locals in technical trainings undertaken under component 4 was highlighted by majority of the councils. The need to upgrade the grid and include battery system while developing solar PV projects were also highlighted. In addition, the lack of proper maintenance of solar PV systems installed through previous projects implemented by ME was highlighted by some councils. ME highlighted that the systems installed through ARISE will be by investors and it is in the interest of the investor to maintain the system and produce the required electricity and this was highlighted as an advantage of this model when compared with what was done through previous projects. Finally, to address concerns relating to limited space for mounting the solar panel, Section 6.8 of the ESMF prepared under the project as well as Annexes 2, 3, 4 and 9 of the ESMF defines the procedures that will be followed for the installation of the solar PVs.
Additional consultations will be undertaken as part of screening, feasibility studies, ESIA and/or ESMP preparation. These will be duly documented in the respective outputs of the consultancies. In addition, the technical coordinators, E&S Coordinator and the island level officials will be required to undertake continuous consultations with stakeholders and report throughout the project cycle, including as part of ESMF monitoring and implementation of the SEP prepared for the project.
3 REGULATIONS AND REQUIREMENTS

This section looks briefly into national and world bank requirements applicable with regards to stakeholder engagement.

3.1 WORLD BANK REQUIREMENTS

As highlighted before, this plan is developed to meet the requirement of paragraph 13 of Environmental Social Standard 10 (ESS10) Stakeholder Engagement and Information Disclosure of the World Banks ESF. The main objective of this ESS10 are as follows:

1. To establish a systemic approach for stakeholder engagement that will allow borrowers to identify the stakeholders and maintain a constructive relationship during the project lifecycle.
2. To assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance.
3. To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
4. To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.

Borrowers are required to develop a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts (paragraph 13). Stakeholders have to be identified and the SEP has to be disclosed for public review and comment as early as possible, before the project is appraised by the World Bank.

3.2 NATIONAL REQUIREMENTS

There are number of legal requirements for stakeholder engagement highlighted in national laws and regulations. These are summarized below:
1. Decentralization Act (Act no: 24/2019)
   - As per article 68 of the Act, for any development project undertaken in an island, consultation needs to be undertaken with the council and other relevant authorities established in the island. The same article also states that any EIA reports developed for any project needs to be shared with the council and information on the impacts and mitigation measures should be shared with the council.
   - As per article 107-1 of the Act, the council should hold meetings with the public regarding any important development activities undertaken in the island. The same article also specifies that the time and location of the public meeting should be announced 05 days prior to the meeting.
   - As per article 56-6 of the Act, a Women’s Development Committee should be established. The members of the committee should be elected based on an election held amongst the women of the community. As per article 56-7 of the act one of the functions of the committee is to give input to the council regarding various development activities undertaken within the island.

2. Environmental Impact Assessment Regulations (Regulation No: 2012/R-27)
   - As per article 11, all relevant stakeholders should be invited to participate in the scoping phase of the EIA process.
   - As per article 12, stakeholder and public consultation needs to be undertaken as part of the EIA process.
   - During the EIA review stage, as per article 13 of the regulation, a public hearing could be undertaken for highly controversial projects.

3. Right to Information Act (Act no: 1/2014)
   - Article 29 of the Constitution 2008 states that everyone has the freedom to acquire and impart knowledge, information and learning.
Under article 4 of Right to Information Act [1/2014], ratified on 17th January 2014, everyone who requests for information is entitled to the access of such information in accordance with the law. Article 07 of the law specifies the procedures for requesting for and disclosure of information from and by State institutes. Information must be disclosed within 21 days of request. An institution may extend the period for 14 more days, if the requested information is of (a) a large quantity, or (b) extensive research is required to collect and disclose the information, or (c) where the work needed to disclose such information would substantially hinder the normal operation of the State body. Information needed urgently to prevent a threat to life or freedom of a person must be disclosed within 48 hours at most. Upon failure to disclose the information within the periods stipulated, the law deems such requests have been denied.

As per article 22, the state is not required to disclose information which, if disclosed would amount to an offense under law, or information if disclosed could cause legal action against the government for breach of confidence or which could prevent the government from receiving similar information in the future. And State institutions could withhold information, which if disclosed could affect the government’s ability to manage and administer the economy of the country and information if disclosed prematurely could have a negative impact on a person or a group of people. The state can further withhold information that harms the immunities of the courts and the parliament, information from a closed court hearing and information that reveal details related to a minor, and victims of sexual abuse.

The Act established an independent office of Information Commissioner who receives complaints, is empowered with ensuring compliance of the law, collecting information, conduct inspections, and investigations. Articles 11 and 42 of the act further obligates an Information Officer in every office to attend to requests and is mandated with submitting an annual report to the Information Commissioner.
Stakeholder mapping is the process used during project management to identify the stakeholders and the level of engagement of different stakeholders during the course of the project lifecycle. The world banks ESS10 identifies two levels of stakeholders:

1. Affected or likely to be affected by the project (project affected parties); and
2. May have an interest in the project (other interested parties)

Stakeholders are often mapped based on the level of influence or power and level of interest. In this regard the following schematic representation is widely used when mapping stakeholders for the purpose of project management.

![Stakeholder Mapping Diagram](image)

**Figure 2 Common method used for stakeholder mapping**

Based on this scheme a mapping exercise was undertaken to determine the key stakeholders of the project based on the information available at the stage of project formulation. Attempt was made to define stakeholders based on interest and influence by categorizing the stakeholders based high, medium, low based on the level of interest and influence. The
The table below summarizes the identified stakeholders and their level of interest and influence based on the initial identification exercise.

**Table 1 Stakeholder classification based on level of interest and influence**

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Level of Interest</th>
<th>Level of Influence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Councils</td>
<td>High</td>
<td>High</td>
</tr>
<tr>
<td>Electricity Service Provider</td>
<td>High</td>
<td>High</td>
</tr>
<tr>
<td>Roof/Space Owners</td>
<td>High</td>
<td>High</td>
</tr>
<tr>
<td>Independent Power Producer</td>
<td>High</td>
<td>High - Medium</td>
</tr>
<tr>
<td>Island Community</td>
<td>High</td>
<td>High - Medium</td>
</tr>
<tr>
<td>Electricity Service Regulator</td>
<td>High - Medium</td>
<td>High</td>
</tr>
<tr>
<td>Ministry of National Planning and Infrastructure</td>
<td>High - Medium</td>
<td>High</td>
</tr>
<tr>
<td>Maldives Civil Aviation Authority</td>
<td>High - Medium</td>
<td>High</td>
</tr>
<tr>
<td>Environmental Protection Agency</td>
<td>Medium</td>
<td>High</td>
</tr>
<tr>
<td>Local Airlines</td>
<td>Medium</td>
<td>Medium</td>
</tr>
<tr>
<td>Works Contractor</td>
<td>Medium</td>
<td>Medium</td>
</tr>
<tr>
<td>BESS Supplier</td>
<td>Medium</td>
<td>Medium</td>
</tr>
<tr>
<td>Environmental NGOs</td>
<td>Medium</td>
<td>Low</td>
</tr>
<tr>
<td>Labour</td>
<td>Medium</td>
<td>Low</td>
</tr>
<tr>
<td>Visitors</td>
<td>Low</td>
<td>Low</td>
</tr>
<tr>
<td>Local Government Authority</td>
<td>Low</td>
<td>Low</td>
</tr>
</tbody>
</table>

Figure 3 provides the final outcome of the mapping exercise showing the level of interest and influence of each stakeholder.
Based on this mapping exercise, the stakeholders can be classified into the two aspects identified in ESS10, i.e. project affected parties and other interested parties. Project affected parties are defined as ‘Affected Parties’ are, persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as being most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

Specifically, based on the mapping exercise those parties in the upper right-hand side can be considered as project affected parties. This category includes the councils, Roof/space owners, electricity service provider, Independent Power Producer and the community. When developing the stakeholder engagement plan special attention need to be made to continuously involve these parties during project implementation. All the other parties identified in the mapping exercise can be categorized as other interested parties. ‘Other Interested Parties’ constitute individuals/groups/entities that may not experience direct impacts from the project but who consider or perceive their interests as being affected by the
project and/or who could affect the project and the process of its implementation in some way. The table below summarizes ‘Project Affected Parties’ and ‘Other Interested Parties’.

Table 2 Project Stakeholders Classification

<table>
<thead>
<tr>
<th>Project Affected Parties</th>
<th>Other Interested Parties</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roof/Space Owners</td>
<td>Environmental Protection Agency</td>
</tr>
<tr>
<td>Island/Atoll Councils</td>
<td>Ministry of National Planning and Infrastructure</td>
</tr>
<tr>
<td>Electricity Service Provider</td>
<td>Ministry of Finance</td>
</tr>
<tr>
<td>Island Community</td>
<td>Local Government Authority</td>
</tr>
<tr>
<td>Electricity Regulator</td>
<td>Environment Protection Agency</td>
</tr>
<tr>
<td>Independent Power Producer</td>
<td>Visitors</td>
</tr>
<tr>
<td></td>
<td>Maldives Civil Aviation Authority</td>
</tr>
<tr>
<td></td>
<td>Local Airlines</td>
</tr>
<tr>
<td></td>
<td>Works Contractors</td>
</tr>
<tr>
<td></td>
<td>BESS Supplier</td>
</tr>
<tr>
<td></td>
<td>Environmental NGOs</td>
</tr>
</tbody>
</table>

Below is the description of how the different stakeholders relate to the project and the rationale for assigning the level of interest and influence to each stakeholder.

4.1 AFFECTED PARTIES

**Roof/Space Owners**: The owners of the space be it a building, land or lagoon area becomes a highly influential stakeholder for implementation of the project. A Roof/Space Lease Agreement needs to be signed with the legal owner and the IPP under component 1 of the project thus they become a key stakeholder in implementing the project. Moreover, a Memorandum of Understanding (MOU) is signed between the roof/space owner and the Ministry to secure the space required for the purpose of the project prior to bidding stage under component 1. Examples of roof/space owners include Housing Development Corporation (HDC), councils, Ministry of Housing, Regional Airports, Ministry of Education, Ministry of Islamic Affairs etc.
**Councillors:** Island councils, atoll councils and city councils will have significant impact for successful implementation of the project. The councils are key in identifying the available space for implementation of component-1 of the project. Moreover, as the elected representatives of the community the councils have a significant say on all project activities undertaken in their jurisdiction. Since the Amended Local Government Act (Act no: 24/2019) gives additional powers to the councils which were previously controlled by the central government, their role has been more critical. In this regard, as per the article 69-1 of the Act, the island and city councils are overall responsible to provide the electricity service in the respective island or city. As per article 69-2 of the same act, the council needs to have an agreement with utility service provider for implementation of the service. Under the same article, it is stated that this agreement needs to be made as per conditions that are set by a regulation prepared and implemented by the central government. The referred agreements above need to be made within 01 year of enforcement of the act, hence before 15<sup>th</sup> December 2020. Moreover, the act provide opportunity for island and city councils to provide electricity service themselves. Furthermore, the act highlights that the councils play a key role in monitoring projects implemented by the central government. The atoll council under the new structure is comprised of all the island and city council presidents and one elected atoll council president and is responsible as an overarching body to resolve various issues that arise within islands and cities within the atoll. Thus, under the current government administrative structure, the councils, especially island and city councils, become a highly influential and important party in project implementation.

**Electricity Service Provider:** As the off taker of component 1, a PPA needs to be signed with the electricity service provider and the IPP. Moreover, Component 2 and 3 can be implemented with their direct involvement. In addition, the institutional capacity of the service provider needs to be improved through Component 4. Therefore, the Electricity Service Provider is a key implementation partner in implementing all the components of the project, thus they become a highly influential and affected partner in implementing the project.

**Independent Power Producer:** The IPPs will play a key role in implementing Component 1 of the project, especially since a long-term contract (15 to 20 years) is made with these parties
to sell electricity to Electricity Service Provider. During this time, maintenance will be undertaken by this party, hence they are an affected party, with medium to high influence.

**Island Community:** Where any development project is undertaken the community of that particular island or city becomes one of the key stakeholders. Even, as per the amendments made to Local Government Act (Act no: 24/2019), for any development project implemented by the government, consultation with the community needs to be undertaken by the island or city council. It is important that the community is consulted at various stages of the project including before commencing, during construction and during implementation. Moreover, it is important to ensure that views of the vulnerable groups are incorporated during consultations undertaken. Article 11 of ESS10 of Environmental and Social Framework of the World Bank identifies this need. For any project undertaken in an island the community of that particular island will be very interested and members of the community will be interested to know the benefits of such projects. In terms of influence they can be categorized as medium, as they can influence the projects through their elected representatives.

**Electricity Regulator:** At the time of writing this plan, Maldives Energy Authority is electricity regulator. The government is in the process of establishing a Utility Regulatory Agency (URA) identifying a single entity to regulate the utility service (electricity, water, sewer and waste). Electricity Regulator is responsible to provide approvals to power systems, undertake inspections of the systems and provide license to operators and engineers. As the regulatory entity, the authority thus becomes a highly influential stakeholder with high to medium interest for successful implementation of the project.

### 4.2 OTHER INTERESTED PARTIES

**Ministry of National Planning and Infrastructure:** As the overall Ministry responsible for planning of development within Maldives Ministry of National Planning and Infrastructure becomes a highly influential stakeholder with high-medium level of interest. Moreover, all lands allocated to a particular project needs to be approved by Maldives Land Survey Authority under the Ministry. Thus, Ministry of National Planning and Infrastructure is a key stakeholder in implementing the project.
**Ministry of Finance:** All donor funded project agreements are signed by the Ministry of Finance and reporting should be made to the Ministry. Thus, like all donor funded project, the Ministry becomes a highly influential stakeholder with high to medium level of interest.

**Environmental Protection Agency:** Clearances need to be attained from Environmental Protection Agency, as all development projects are scrutinized through the Environmental Impact Assessment process regulated by the EPA. Thus, all developments undertaken through this project needs to be cleared through the EIA process locally via EPA in addition to World Bank clearance. Hence EPA is a highly influential stakeholder. In terms of interest, it is in the interest of EPA to reduce emissions in general and to promote renewable energy, hence level of interest is categorized as medium.

**Maldives Civil Aviation Authority:** As some of the selected sites are within the boundary of the airports, clearances need to be attained from civil aviation authority. In this regard, there is need to undertake glare assessment for all such sites. Thus, Maldives Civil Aviation Authority becomes a highly influential stakeholder and since it concerns with safety and security they have medium to high level of interest when it comes to sub-projects that are implemented in airports.

**Local Airlines:** Local airlines are categorized as medium interest and medium influence stakeholder. They are included as a stakeholder as some airports are planned to be utilized for the purpose of the project. If there are any issues they are to report to civil aviation authority thus, their interest and influence are categorized as medium.

**Works Contractors:** This includes contractors hired by the Ministry for grid upgradation, investor for installation of solar PV and any contractor involved in BESS system installation. These are parties that have short term interests and short-term involvement in the project. However, during that period works are undertaken these parties can influence the project significantly. Thus, they can be classified as having medium level of interest and influence.

**BESS Suppliers:** BESS suppliers like works contractors will have interest and influence for a very short period of time. Thus, they can be classified as having medium level of interest and influence on the project.
Environmental NGOs: As this is a renewable energy project, environmental NGOs will be interested on the overall impact of the project on reducing the carbon foot-print of the country. However since most of the environmental NGOs are centralized and most of the project interventions occur in the outer islands the influence can be considered as low.

Local Government Authority: As the regulatory body of the councils and since the councils within the selected islands for the project have high interest and high influence, LGA may be identified as low interest, low influence stakeholder for ARISE project.

Visitors: Visitors here refer to those parties outside of the community who visit the project implemented locations. As Solar PV is planned to be installed in lagoons and other public spaces under component 1, they become low interest low influence stakeholders for the project, but they are interested parties whose conveniences would be affected by the civil works carried out in the island.

4.3 DISADVANTAGED/VULNERABLE INDIVIDUALS OR GROUPS

As per the ESF, ‘Vulnerable Groups’ are persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

The mapping exercise undertaken so far under this section does not account for vulnerable sub-groups that exist within these stakeholder groups. Particularly, island community is likely to have many vulnerable groups based on life situation.

In Maldives, especially in islands, when public meetings are held often men participate in such meetings and are often the dominant voice in such meetings. Women are the primary caretakers of the household taking care of all household chores from cooking, cleaning to childcare. Especially women with young children are excluded from such consultative exercises. Thus, this SEP will define special methods to ensure that the input of such parties is incorporated in any consultation exercises undertaken.

In addition to women, in some islands there are migrant population that have moved to the islands from other islands through the policies of various governments to move islands with
smaller islands to bigger islands. Also, some of these communities were moved due to the loss of livelihood that occurred due to Tsunami. Such migrant populations often form a small minority groups within the community, hence in islands where such groups exist targeted consultation with such groups will be undertaken.

Furthermore, if rooftops are used those who use the buildings are likely to be disproportionately impacted when compared with rest of the community. This includes tenants of buildings, in schools staff/children/parents, in mosques for example neighbourhood (ward) at which the mosque is located. This SEP will look into ways to involve any such groups in a targeted manner.

Moreover, depending on time of consultation, certain community groups may be excluded from consultation. For example, in many fishing communities the fishermen are often busy fishing during daytime and will be only available during evening time for community activities/gatherings. Hence, this aspect will also be covered through this SEP.

In addition, Maldives is a country which has a history of discrimination for foreign construction labour. Therefore, effort will be made to ensure that their rights are ensured through this SEP and through other mechanisms that exist through the ESF.

The table below summarizes the potential disadvantaged or vulnerable groups that are likely to exist at locations where project is implementation.

<table>
<thead>
<tr>
<th>Stakeholder Group</th>
<th>Key Vulnerability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Women</td>
<td>• Primary caretaker of the household, thus can’t participate in community meetings etc.</td>
</tr>
<tr>
<td></td>
<td>• Often not in key decision-making positions hence less opportunity to contribute through normal channels</td>
</tr>
<tr>
<td>Minority community groups (migrant population)</td>
<td>• Often viewed as outsiders and not involved in community level engagements.</td>
</tr>
<tr>
<td>People who reside and use buildings</td>
<td>• Disproportionately impacted if anything goes wrong.</td>
</tr>
</tbody>
</table>
### Stakeholder Group | Key Vulnerability
--- | ---
Disadvantaged due to profession (eg: Fishermen) | • Community meetings held at times when most fishermen are out in the sea, thus excluded from engagement activities.

Foreign construction labour | • Discrimination from the employer and the community, overworking, lack of payment, not renewing work permit etc.

The next section details SEP, including for each of the identified stakeholder, the methods utilized to engage the stakeholder, the level of involvement, means of communications and the responsible parties for the proposed task. Specific means are identified to ensure disadvantaged and vulnerable groups are engaged.
In addition, to classifying stakeholders based on the mapping exercise academic literature often identifies 02 main aspects that is required for meaningful stakeholder involvement. These conditions can be defined as fairness and competence. Fairness here refers to the notion that each affected party having equal opportunity to express views regarding the project (Palerm, 2000; Petts, 1999b; Webler, 1995). This can be guaranteed by having an inclusive participatory process that ensures that there are no biases towards different stakeholder groups. Especially with regards to public consultation it is important to utilize multiple methods to ensure a fair process. For example, stakeholder consultation meetings can prevent some parties from expressing their views, as often such meetings are dominated by several dominant voices. Often vulnerable groups are excluded when only such methods are utilized. Hence, it is important that the Stakeholder Engagement Plan utilizes multiple methods. The second aspect identified in literature is competence (Palerm, 2000; Webler, 1995). Competence here means that the participatory process should ensure that all parties have the required information regarding the project to give an informed input. Thus, providing concise accurate information during the lifecycle of the project is very important to attain a meaningful feedback from the stakeholders. Hence, means of providing information regarding the project via various communication channels becomes an important part of this plan.

The table 4 summarizes the details of the stakeholder engagement plan including the type of stakeholder based on ESS10 classification, anticipated issues and interest, stages of involvement, methods of involvements, proposed communications and responsible party. The plan specifies specific methods to attain input of particularly vulnerable groups within the community, so as to ensure fairness of the process. Proposed communications addresses the strategy to provide up to date project information to the stakeholders, so as to ensure the competence of the stakeholder engagement process. In addition, it identifies the approvals that need to be attained from certain stakeholders, to ensure successful project implementation. Moreover, Table 5 provides details of specific measures that will be
employed to ensure participation of identified vulnerable groups. In addition, a Gender Action Plan has been developed for the project to ensure that the project activities are undertaken in such a way that it facilitates to address gender inequalities that exist (See, Section 6.10 and Annex 27 of the Environmental and Social Management Framework for the ARISE Project).
<table>
<thead>
<tr>
<th>#</th>
<th>Stakeholder</th>
<th>Type of Stakeholder</th>
<th>Anticipated Issues and Interests</th>
<th>Stages of Involvement</th>
<th>Methods of Involvement</th>
<th>Proposed Communications/ Information Disclosure</th>
<th>Responsible Parties</th>
</tr>
</thead>
</table>
| 1 | Island Community | Affected party | • Reduction in electricity prices (if any)  
• Convenience in using space (if common space)  
• Any potential safety and security risks  
• Long term maintenance if any damage  
• Potential job opportunities due to project interventions  
• Any additional direct benefits to the community as a result of the project | • During site selection  
• During preparation of ESIA/ESMP  
• While undertaking any feasibility studies for the project  
• During ESIA monitoring  
• During any project implementation | • Public Consultation meetings  
• Public perception surveys | • Project Information Leaflets available from the council, schools, Electricity Service Provider front office and other frequent public service areas  
• Project information shared via social media routinely with progress, through dedicated social media platforms for the project and reposted through official social media platforms of the Ministry, Electricity Service Provider, the Councils and the investor  
• Provide information regarding grievance redress mechanism  
• Display grievance redress mechanism details at the council office and at the project sites  
• Awareness sessions on renewable energy to general public  
• Any information regarding any public meetings announced 05 days prior to the meeting, identifying the date, time, location and proposed project intervention details. Placed in council notice board and social media platforms of council, ministry, electricity service provider and the investor.  
• Information sessions regarding the project through mainstream media, through programs and videos developed specifically regarding the project | Project Management Unit (PMU), Island Council, Electricity Service Provider, Investor (IPP) |
| 2 | Councils | Affected Party | • Reduction in electricity prices (if any) | • During site selection  
• During preparation of ESIA/ESMP | • Meetings with the council.  
• Site visits with the council. | • Project updates shared with the council routinely  
• Identifying a project focal point from the councils for easy communications regarding the project. | Project Management Unit, Electricity Service Provider |
<table>
<thead>
<tr>
<th>#</th>
<th>Stakeholder Type of Stakeholder</th>
<th>Anticipated Issues and Interests</th>
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<th>Responsible Parties</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>• Convenience in using space (if common space)</td>
<td>• While undertaking any feasibility studies for the project</td>
<td>• Training to council regarding project implementation monitoring and project communications</td>
<td>• Communications regarding the project shared through the council via social media platforms and other established norms of the council.</td>
<td>Service Provider, Investor (IPP)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Any potential safety and security risks</td>
<td>• During ESIA monitoring</td>
<td>• Involve council during project implementation monitoring.</td>
<td>• Make arrangements to ensure that project information is available from the council.</td>
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<tr>
<td></td>
<td></td>
<td>• Long term maintenance if any damage</td>
<td>• As part of the implementation in addressing any grievances that may exist regarding the project</td>
<td>• Project Steering Committee meetings if and when specific island issues are discussed</td>
<td>• Awareness sessions regarding the project specifically and regarding renewable energy in general</td>
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<tr>
<td></td>
<td></td>
<td>• Potential job opportunities due to project interventions</td>
<td>• During project preparation</td>
<td>• Coordinate and involve council when conducting project public participation exercises.</td>
<td>• Realtime Smart displays showing, power generated, carbon dioxide savings as a result of the system installed at the site.</td>
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<tr>
<td></td>
<td></td>
<td>• Any financial benefit to the council due to project implementation</td>
<td>• During site selection</td>
<td>• Project technical committee</td>
<td>• Requirements under SEP, LMP and ESMF communicated to IPP through information sessions</td>
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<tr>
<td></td>
<td></td>
<td>• Any additional direct benefits to the council/community as a result of the project</td>
<td>• While undertaking any feasibility studies</td>
<td>• Project steering committee</td>
<td>• Training of ESOs on Environment and Social inspection and monitoring.</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>• While preparing ESIA/ESMP</td>
<td>• Consultative meeting</td>
<td>• Project updates shared with Electricity Service provider routinely</td>
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</table>

**Electricity Service Provider, Affected Party**

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<tr>
<th>#</th>
<th>Stakeholder Type of Stakeholder</th>
<th>Anticipated Issues and Interests</th>
<th>Stages of Involvement</th>
<th>Methods of Involvement</th>
<th>Proposed Communications/ Information Disclosure</th>
<th>Responsible Parties</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>Electricity Service Provider</td>
<td>• Impacts on energy generation capacity of the electricity service provider as a result of the project</td>
<td>• During project preparation</td>
<td>• Project technical committee</td>
<td>• Requirements under SEP, LMP and ESMF communicated to IPP through information sessions</td>
<td>Project Management Unit, Investor (IPP)</td>
</tr>
<tr>
<td></td>
<td>Affected Party</td>
<td>• Impacts on grid stability</td>
<td>• During site selection</td>
<td>• Project steering committee</td>
<td>• Training of ESOs on Environment and Social inspection and monitoring.</td>
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<td></td>
<td></td>
<td></td>
<td>• While preparing ESIA/ESMP</td>
<td>• Consultative meeting</td>
<td>• Project updates shared with Electricity Service provider routinely</td>
<td></td>
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</tbody>
</table>

**STAKEHOLDER ENGAGEMENT PLAN (ARISE PROJECT)**
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<thead>
<tr>
<th>#</th>
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<th>Responsible Parties</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Level of battery storage available and the subsequent impacts</td>
<td>• During project implementation</td>
<td>regarding project implementation</td>
<td>• Identifying focal points from the side of the electricity service provider for easy communications regarding the project</td>
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<td></td>
<td></td>
<td></td>
<td>• Availability of technical trainings to the staff of electricity service provider</td>
<td></td>
<td>• Involve Electricity Service Provider during project implementation monitoring</td>
<td>• Make arrangements to ensure that project information is available from the front offices of electricity service provider</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>• Financial impacts as a result of the project</td>
<td></td>
<td>(Identify island level Environmental and Social Officers (ESOs) to undertake Environmental and Social monitoring)</td>
<td>• Awareness sessions on technical aspects</td>
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<td></td>
<td></td>
<td></td>
<td>• Price at which the IPP sells power</td>
<td></td>
<td>• Training to staff of electricity service provider regarding project implementation monitoring</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>• Support available for grid upgrading</td>
<td></td>
<td>• Technical trainings to staff of electricity Service provider</td>
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<td></td>
<td></td>
<td></td>
<td>• How the project contributes to achieve overall renewable energy targets of the government</td>
<td></td>
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<tr>
<td>4</td>
<td>Independent Power Producer (IPP)</td>
<td>Affected Party</td>
<td>• Impacts on labour force</td>
<td>• While preparing ESIA/ESMP</td>
<td>• Develop Labour Management Procedures (LMP) for the project</td>
<td>• Requirements under SEP, LMP and ESMF communicated to IPP through information sessions</td>
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</tbody>
</table>

STAKEHOLDER ENGAGEMENT PLAN (ARISE PROJECT)
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</thead>
<tbody>
<tr>
<td>5</td>
<td>Roof/Space Owner</td>
<td>Affected Party</td>
<td>• Impacts on safety and security of the installed system</td>
<td>• During project implementation</td>
<td>• Minimum monthly meetings with IPP during construction phase&lt;br&gt;• Quarterly meetings with IPP during implementation phase</td>
<td>• Project updates shared with space/roof owner&lt;br&gt;• Identifying focal points to communicate regarding project&lt;br&gt;• Providing project leaflets and other project related information to roof/ space owner and to people who utilize the building or the space.&lt;br&gt;• Provide information regarding grievance redress mechanism of the project.&lt;br&gt;• Display grievance redress mechanism details at the site and council offices.&lt;br&gt;• Awareness sessions regarding the project specifically and regarding renewable energy in general to building occupants (for example school students, teachers, tenants of buildings) and users of the space.&lt;br&gt;• Realtime Smart displays showing, power generated, carbon dioxide savings as a result of the system installed at the site.</td>
</tr>
<tr>
<td>#</td>
<td>Stakeholder</td>
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<td>Methods of Involvement</td>
<td>Proposed Communications/ Information Disclosure</td>
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<tr>
<td>6</td>
<td>Maldives Civil Aviation Authority</td>
<td>Affected Party</td>
<td>• Impacts on aviation as a result of project implementation</td>
<td>• During site selection</td>
<td>• Invitee to project steering committee based on issue.</td>
<td>• Share project information</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• While preparing ESIA/ESMP</td>
<td>• Consultative meetings</td>
<td>• Provide information regarding grievance redress mechanism of the project.</td>
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<td></td>
<td></td>
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<td></td>
<td>• While preparing Glare Assessments</td>
<td></td>
<td>• Submit glare assessment to attain the required approvals</td>
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<td></td>
<td></td>
<td>• During project implementation</td>
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<tr>
<td>7</td>
<td>Electricity Regulator</td>
<td>Affected Party</td>
<td>• Impacts on grid stability</td>
<td>• During project preparation</td>
<td>• Project Technical Committee</td>
<td>• Project updates shared with Electricity Regulator</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Level of battery storage available and the subsequent impacts</td>
<td>• While undertaking any feasibility studies related to energy sector</td>
<td>• Project Steering Committee</td>
<td>• Identifying focal point from the Electricity Regulator for easy communications regarding the project</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Availability of technical trainings to the staff of electricity service regulator</td>
<td>• While preparing ESIA/ESMP</td>
<td>• Consultative meetings</td>
<td>• Awareness sessions on Technical aspects</td>
</tr>
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<td></td>
<td></td>
<td></td>
<td>• Impacts on tariff</td>
<td>• During power system approval (material/design)</td>
<td>• Technical trainings to staff of Electricity Regulator</td>
<td>• Submit to attain the required approvals for power system</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• How the project contributes to achieve overall renewable energy targets of the government</td>
<td>• During project implementation</td>
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</tr>
<tr>
<td>8</td>
<td>Ministry of National</td>
<td>Interested Party</td>
<td>• Impacts on land use</td>
<td>• During site selection</td>
<td>• Project Steering Committee</td>
<td>• Share project information</td>
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<td></td>
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<td></td>
<td>• While attaining landuse approval</td>
<td></td>
<td>• Submit to attain landuse approval</td>
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</table>

STAKEHOLDER ENGAGEMENT PLAN (ARISE PROJECT)
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<tr>
<th>#</th>
<th>Stakeholder Type</th>
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<th>Proposed Communications/ Information Disclosure</th>
<th>Responsible Parties</th>
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<tbody>
<tr>
<td></td>
<td>Planning and Infrastructure</td>
<td>Planning and Infrastructure</td>
<td>• Impacts on overall development policy of the government • While preparing ESIA/ESMP • During project implementation</td>
<td>• While preparing ESIA/ESMP • During project implementation</td>
<td>• Consultative meetings</td>
<td></td>
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</tr>
<tr>
<td>9</td>
<td>Ministry of Finance</td>
<td>Interested Party</td>
<td>• Successful completion of project • Efficient use of funds allocated for the project</td>
<td>• During project preparation • During project implementation</td>
<td>• Project Steering Committee • Consultative meetings</td>
<td>• Share project progress information</td>
<td>Project Management Unit</td>
</tr>
<tr>
<td>10</td>
<td>Environmental Protection Agency</td>
<td>Interested Party</td>
<td>• Environmental impacts due to the project</td>
<td>• While Preparing ESIA/ESMP • During ESIA/ESMP monitoring • During project implementation</td>
<td>• Consultative meetings</td>
<td>• Share project information • Submit to attain ESIA/ESMP approval • Submit ESIA/ESMP monitoring</td>
<td>Project Management Unit, Investor (IPP)</td>
</tr>
<tr>
<td>11</td>
<td>Local Airlines</td>
<td>Interested Party</td>
<td>• Impacts on aviation as a result of project implementation</td>
<td>• During project implementation</td>
<td>• Engage if and where required</td>
<td>• Share project information • Provide information regarding grievance redress mechanism of the project.</td>
<td>Project Management Unit, Investor (IPP)</td>
</tr>
<tr>
<td>12</td>
<td>Works Contractor</td>
<td>Interested Party</td>
<td>• Impacts on labour force</td>
<td>• During project implementation</td>
<td>• Develop Labour Management Procedures for the project • Minimum Monthly meetings with contractor during</td>
<td>• Requirements under SEP, LMP and ESMF communicated to works contractor through information sessions</td>
<td>Project Management Unit, Investor (IPP), Electricity Service Provider,</td>
</tr>
<tr>
<td>#</td>
<td>Stakeholder</td>
<td>Type of Stakeholder</td>
<td>Anticipated Issues and Interests</td>
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<td>Proposed Communications/ Information Disclosure</td>
<td>Responsible Parties</td>
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<tr>
<td>13</td>
<td>BESS Supplier</td>
<td>Interested Party</td>
<td>• Impacts on labour force</td>
<td>• During project implementation</td>
<td>• Develop labour management procedure for the project</td>
<td>• Specifics defined in LMP</td>
<td>Project Management Unit, Electricity Service Provider, Works Contractor</td>
</tr>
<tr>
<td>14</td>
<td>Environmental NGOs</td>
<td>Interested Party</td>
<td>• Contribution of the project to increase renewable energy contribution of Maldives</td>
<td>• During project implementation stage</td>
<td>• Provide project information and updates</td>
<td>• Where specific NGOs exist in the islands where project interventions are undertaken targeted consultations</td>
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<td></td>
<td></td>
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<td></td>
<td></td>
<td>• Where specific NGOs exist in the islands where project interventions are undertaken targeted consultations</td>
<td>• Project leaflets and newsletters sent to Environmental NGOs routinely</td>
<td>Project Management Unit</td>
</tr>
<tr>
<td>15</td>
<td>Local Government Authority</td>
<td>Interested Party</td>
<td>• Impacts on councils (indirect)</td>
<td>• During project implementation</td>
<td>• Engage if and where required</td>
<td>• If there are any issues while coordinating with local councils the issue needs to be communicated with LGA</td>
<td>Project Management Unit, Electricity Service Provider</td>
</tr>
<tr>
<td>16</td>
<td>Visitors</td>
<td>Interested Party</td>
<td>• Any potential health and safety risks</td>
<td>• During Project implementation</td>
<td>• Engage if and where required</td>
<td>• Display grievance redress mechanism details at the council office and at the project sites easily accessible to any visitors</td>
<td>Project Management Unit, Investor (IPP),</td>
</tr>
<tr>
<td>#</td>
<td>Stakeholder</td>
<td>Type of Stakeholder</td>
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<tr>
<td></td>
<td>Electricity Service Provider</td>
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<tr>
<td>#</td>
<td>Vulnerable Groups</td>
<td>Specific Measures to ensure participation</td>
<td>Responsible Parties</td>
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<tr>
<td>1</td>
<td>Women</td>
<td>Household Surveys targeted at women Hold public consultation meetings during evening (To ensure that women who could not participate due to household chores could participate) Training of women’s development committees in the islands to undertake awareness sessions targeted at women</td>
<td>Project Management Unit, Electricity Service Provider, Island Council</td>
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<tr>
<td>2</td>
<td>Minority community groups (migrant population)</td>
<td>Special targeted consultation with minority groups within the community. These groups usually reside in a single location thus household surveys will be undertaken in such locations.</td>
<td>Project Management Unit, Electricity Service Provider, Island Council</td>
<td></td>
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<tr>
<td>3</td>
<td>People who reside and use buildings</td>
<td>Targeted Consultation with users and residents of the buildings whose roofs are utilized (tenants, for schools parents and teachers, staff of an office buildings and for mosques for example households within a particular ward in which the mosque is located)</td>
<td>Project Management Unit, Electricity Service Provider, Roof/Space Owner</td>
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<tr>
<td>4</td>
<td>Disadvantaged due to profession (eg: Fishermen)</td>
<td>Hold public consultation meetings during evening. When employment commitments are not there and when most of the fishermen are back in the island.</td>
<td>Project Management Unit, Electricity Service Provider, Island Council</td>
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<tr>
<td>5</td>
<td>Foreign construction labour</td>
<td>Ensure the information highlighted in Labour Management Procedure (LMP) which covers safety and rights aspects are communicated to the construction workers prior to commencement of construction works</td>
<td>Project Management Unit, Works Contractor, Independent Power Producer Provider</td>
<td></td>
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</tbody>
</table>
5.2 FEEDBACK MECHANISM

A component often missing in consultative activities are a feedback mechanism that shows how the issues raised by the stakeholders are addressed by the project. It is important that such a mechanism is established to ensure stakeholder confidence in the process is maintained. To facilitate this, it is essential all community engagement activities are well documented. In this regard the following actions will be taken:

4. All meeting minutes will be shared and finalized based on the input of the respective stakeholder
5. Every year, perception surveys will be undertaken with stakeholders to determine acceptability of project interventions and level to which concerns are addressed by the project.
6. Following perception/household surveys, a report will be complied and publicly made available through the website of the ministry, island council, Electricity service provider.

The issues identified by the stakeholders will be listed and mechanisms/strategy to address the issues identified will be devised and communicated with the respective stakeholders. Follow up meetings will be held with stakeholders to determine acceptability of the proposed solutions. The steering and technical committees highlighted in the next section are an important aspect of this feedback loop. The committees will discuss the key decisions that needs to be taken at a project management level and invite all relevant stakeholders during the discussions. Thus, the stakeholders will be well informed of the decision-making process and will be given a final say in the outcomes of the various aspects of the project. In the previous projects implemented in the Maldives, local community was not part of this committee. However, for this project, where island specific issues are discussed, the island/city councils will be invited to take part in the discussions through the steering committee and thus given the opportunity to have a final say in the outcome.
5.3 PROJECT STEERING COMMITTEE

As highlighted previously a project steering committee needs to be formulated comprising of the most influential and interested stakeholders. This section discusses the composition and charter of the project steering committee.

5.3.1 COMPOSITION

The committee comprises of the following stakeholders:

- Energy Service Providers (as for now Fenaka and Stelco)
- Energy Regulator (as for now Maldives Energy Authority)
- Ministry of Environment
- Ministry of Finance
- Ministry of National Planning and Infrastructure
• Roof/Space owners
• Island Councils
• Maldives Civil Aviation Authority

Of these the first five stakeholders identified are the permanent members of the committee. These are the only stakeholders that are likely to have influence and interest on all aspects of the project. Others identified will have interest for specific sub-projects only. Thus, position for these stakeholders are reserved as invitees to the steering committee based on issues. Hence, roof/space owners, island councils and Maldives Civil Aviation Authority need to be invited if the agenda of a meeting involves issues pertaining to their interests. The chair of the committee is Ministry of Environment and the secretariat of the committee is the project management unit within the Ministry.

![STEERING COMMITTEE Diagram](image)

*Figure 5 Structure of steering committee*
5.3.2 CHARTER

- Steering committee meetings should be held at least twice every year. Ideally in the first quarter and the last quarter of the year.
- The quorum for the committee is 04 members including the chair.
- The secretariat for the steering committee is the Project Management Unit.
- Each steering committee stakeholder need to identify one senior individual at the decision-making level to represent the stakeholder at the committee.
- Steering committee meeting invitation should be sent at least 05 days prior to holding the meeting.
- The project manager or in his/her absence a project staff designated by the manager, should provide a presentation to committee members covering the following aspects the progress of each of the components of the project, key milestones/achievements and challenges.
- Yearly work plan and budget needs to be presented and endorsed by the project steering committee.
- The meeting agenda and any supporting documents relevant to the discussions need to be sent with the meeting invitation.
- Of the two compulsory meetings at least one meeting should be held in one of the outer islands where project activities are undertaken.
- If any member requests to hold a steering committee meeting such a request need to be made in writing with reason submitted to committee secretariat. In such an event the committee secretariat should hold the meeting within one month of receiving the request.
- Minutes of the steering committee meetings should be shared with the all committee members including non-attending members within 03 days of holding the meeting. The committee members should be given one week to submit comments to the minutes. If
no comments are received within a week the minutes will be considered as final and will be endorsed in the subsequent meeting.

- Once meeting minutes are endorsed it needs to be shared publicly through the website of the Ministry.

5.4 PROJECT TECHNICAL COMMITTEE

In addition, to the steering committee a project technical committee is equally important to discuss technical issues related to grid, solar PV and BESS that arise during project implementation. Such a committee will enable quick resolution of issues that arise during project implementation. This section discusses the composition and charter of this committee.

5.4.1 COMPOSITION

This committee needs to include all the technical (energy sector) stakeholders identified through the mapping exercise. This includes, in addition to technical staff within the PMU and the Ministry, technical staff of energy service providers and energy regulator. This committee will facilitate the project manager to consult technical staff regarding various aspects prior to taking decisions. The committee will be chaired by the project manager and will include in its composition all technical staff within the project management unit, technical focal points allocated to the project from the Energy Service Providers and Energy Regulator. In addition, based on issue any other invitees by the manager can take part in this committee. The meetings of this committee need to be held more often than the steering committee as issues are likely to arise more often.
Figure 6 Structure of technical committee

5.4.2 CHARTER

- Technical committee meetings should be held at least every quarter.
- The quorum for the committee is 03 members including the chair.
- The secretariat of the technical committee is the Project Management Unit.
- Each technical committee stakeholder need to identify at least one technical staff to represent the stakeholder at the committee.
- Technical committee meeting invitation should be sent at least 03 days prior to holding the meeting.
- The meeting agenda and any supporting documents relevant to the discussions need to be sent with the meeting invitation.
- Minutes of the technical committee meetings should be shared with the all committee members including non-attending members within 03 days of holding the meeting. The committee members should be given one week to submit comments to the minutes. If no comments are received within a week the minutes will be considered as final and will be endorsed in the subsequent meeting.
- All technical committee meeting minutes need to be shared with the members of the steering committee for their information.
5.5 Roles, RESPONSIBILITIES and Resources for Stakeholder Engagement

5.5.1 ROLES AND RESPONSIBILITIES

The project management unit needs to have appropriate resources to implement this stakeholder engagement plan. The composition of the Project management structure is summarized in the figure below.

![Figure 7 Project Management Structure](image)

The key responsibilities of each of the identified staff involved in implementation of this SEP are summarized below:

**Project Management Specialist**: The Project Management Specialist (PMS) will be the person involved in day to day oversight and management of the project. The project management specialist will be responsible to deliver the project as per the project timelines and will be the first point of contact on all project related issues. Moreover the PMS will be required to provide updates and coordinate with the steering committee, project director and the World Bank. In addition, the manager will be responsible for day to day management of the PMU, staff training and management of the staff. In terms of SEP, the PMS will be the key party responsible to provide information on project updates and important decision-making aspects to the project
steering committee and technical committees. Also the PMS will provide guidance to all other staff in implementation of this plan and other safeguards instruments.

**Environment and Social Safeguards Specialist:** To ensure that the project is implemented as per the environmental and social safeguards policies of the government and the World Bank, the project should employ a safeguards specialist. The specialist will be responsible for implementation of project Environment and Social Commitment Plan, Stakeholder Engagement Plan, Labour Management Procedures, Environment and Social Management Framework. The specialist will report to the project manager and will work under the guidance of the project manager and the director.

**Communications Specialist:** To provide updates to the media, to increase visibility of the project, to increase the awareness of the public on renewable energy in general & project interventions specifically and to ensure that safeguards issues are adequately communicated to the public a communications specialist need to be hired. Thus, communications specialist will play a key role in organizing and undertaking community consultative exercises under this SEP. The specialist will report to the project manager and will work under the guidance of the project manager and the director.

**Legal Specialist:** To provide legal support for the project, especially since the project involves many long term contracts made with the IPPs, thus to manage these contracts and to provide legal feedback a legal specialist is required. In terms of SEP, the specialist will play a key role in the discussions with roof/space owners and the councils to secure the space required for the project and will be responsible for drafting the various agreements required for this purpose. The specialist will report to the project manager and will work under the guidance of the project manager and the director.

**Senior Energy Specialist:** The sustainable energy specialist will be overall responsible for implementation of component 1 of the project. The specialist will coordinate all activities related to this component and take the lead role dealing with IPPs, roof/space owners, implementation partners, and project advisors in relation to component 1. The specialist will also determine need for various technical assessments to implement this component and will report the requirements to the project manager. The specialist will provide assistance to Sustainable Energy Specialist and Electrical Engineer in implementation of component 2 and 3. As for SEP the specialist will be responsible to provide technical information to all stakeholders regarding components 1 of the project. The
specialist will report to the project manager and will work under the guidance of the project manager and the director.

**Sustainable Energy Specialist:** Sustainable energy specialist will be overall responsible for implementation of component 2 of the project. The specialist will coordinate all activities related to this component and take the lead role dealing with implementation partners, other stakeholders and project advisors in relation to component 2. The specialist will also determine need for various technical assessments to implement this component and will report the requirements to the project manager. The specialist will provide assistance to Senior Energy Specialist and Electrical Engineer for implementation of component 1 and component 3 of the project. As for SEP the specialist will be responsible to provide technical information to all stakeholders regarding components 2 of the project. The specialist will report to the project manager and will work under the guidance of the project manager and the director.

**Electrical Engineer:** Electrical Engineer will be overall responsible for implementation of component 3 of the project. The engineer will coordinate all activities related to this component and take the lead role dealing with implementation partners, other stakeholders and project advisors in relation to component 3. The engineer will also determine need for various technical assessments to implement this component and will report the requirements to the project manager. The specialist will provide assistance to Sustainable Energy Specialist and Senior Engineer for implementation of component 1 and 2 of the project. As for SEP the engineer will be responsible to provide technical information to all stakeholders regarding component 3 of the project. The engineer will report to the project manager and will work under the guidance of project manager and the director.

**Monitoring and Evaluation Specialist:** To monitor and evaluate project progress and to ensure that the project indicators are met the project will hire a monitoring and evaluation specialist. The specialist will send quarterly progress reports to World Bank and will advise the project manager on issues on project implementation. Moreover, the specialist will be responsible for implementation of Gender Action Plan (GAP) of the project and ensure that various indicators highlighted in the plan are met. The specialist will report to the project manager and will work under the guidance of the project manager and the director.

**Project Coordinator:** A project coordinator should be hired to ensure day to day operations of the project are run smoothly. The coordinator will be responsible to laisse with all project
stakeholders and implementation partners regarding various administrative aspects of the project including, travel and meetings. The coordinator will also look into attendance and other administrative aspects of the staff hired for the project and will provide updates to project manager. The coordinator will report to the project manager and will work under the guidance of the project manager and the director. In terms of SEP, the coordinator will be responsible for arranging the various field trips and other administrative requirements in relation to this SEP.

Specifically in relation to this SEP, the roles and responsibilities of the project staff are summarized below.

**Table 6 Responsibilities of PMU staff**

<table>
<thead>
<tr>
<th>Staff</th>
<th>Responsible Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Project Management Specialist</strong></td>
<td>• Ensure that all project activities are undertaken as per SEP</td>
</tr>
</tbody>
</table>
| **Environment and Social Safeguards Specialist** | • Undertake stakeholder and public consultations  
• Provide feedback to stakeholders  
• Provide Information on Safeguards requirements to stakeholders  
• Ensure that ESIA/ESMP are undertaken for relevant sub-projects  
• Implement Tier-3 of the GRM  
• Give information on GRM of the project to all stakeholders. |
| **Communications Specialist**          | • Responsible for implementation of all the awareness raising activities identified in this SEP.  
• Responsible to design and prepare all outreach material, leaflets, billboards, videos.  
• Provide to media project updates through news articles, radio/tv programs etc  
• Maintain social media platforms of the project |
| **Monitoring and Evaluation Specialist** | • Undertake perception surveys to determine acceptability of the interventions through SEP.  
• Responsible to arrange and hold Project Steering Committee.  
• Responsible to arrange and hold Project Technical Committee.  
• Responsible for implementation of Gender Action Plan (GAP). |
| **Legal Specialist**                   | • Ensure that MOUs are signed with roof/space owners and the ministry.  
• Give information to stakeholders regarding various legal instruments that exist within the project.  
• Negotiate with IPP, roof/space owners, electricity service provider and agree on legal provisions under project agreements. |
| **Project Coordinator**                | • Arrange trips to project sites to undertake activities highlighted in SEP.  
• Arrange all meetings associated with SEP.  
• Write project meeting minutes.  
• Ensure that all project meeting minutes are compiled and communicated with relevant stakeholders for feedback. |
| **Various Technical Specialists (Senior Energy Specialist)** | • Ensure that project technical information are shared with stakeholders during consultations. |
Sustainable Energy Specialist & Electrical Engineer

- Share technical knowledge on energy saving, benefits of renewable energy etc during awareness raising sessions.

In addition to direct project staff, project focal points identified by the Electricity Service Provider will be involved in all public consultation exercises and awareness raising activities undertaken by the project. Each electricity service provider will identify island level Environment and Social Officers to assist in the implementation of SEP, LMP and ESMF.

5.5.2 ESTIMATE BUDGET

As this SEP requires significant involvement with the community of the islands, a number of trips need to be undertaken. Moreover, visual aids and other materials needs to be printed when undertaking awareness activities. The table below summarizes the expenditure required to implement this SEP.

Table 7 Breakdown of costs under SEP

<table>
<thead>
<tr>
<th>Activity</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Materials (leaflet, billboards, T-shirts, educational material)</td>
<td>300,000</td>
</tr>
<tr>
<td>Visual Aids</td>
<td>200,000</td>
</tr>
<tr>
<td>Air fare</td>
<td>965,000</td>
</tr>
<tr>
<td>Sea Transport</td>
<td>86,000</td>
</tr>
<tr>
<td>Per Diem</td>
<td>1,013,094</td>
</tr>
<tr>
<td>Total</td>
<td>2,564,094</td>
</tr>
</tbody>
</table>

These costs will be included in the cost tables for the project to ensure implementation.
It is important to have an avenue for any affected persons to raise their concerns regarding the project and such issues addressed promptly. For this purpose, a grievance redress mechanism becomes integral part of stakeholder engagement process. The mechanism needs to take into special consideration vulnerable groups and how easy access to the grievance mechanism is ensured to such parties.

A three-tier system will be established under the project to ensure a fair process for addressing grievances. This GRM was developed based on the experience of Accelerating Sustainable Private Investment in Renewable Energy (ASPIRE) project which was the first project involving IPP model of solar PV installation in Maldives. The GRM information will be given to the stakeholders during the project consultative meetings. Furthermore, the GRM will be displayed in council notice board, website and a notice board highlighting the process will be installed in each project site.

<table>
<thead>
<tr>
<th>Tiers of Grievance Mechanism</th>
<th>Nodal Person for Contact</th>
<th>Contacts, Communication and Other Facilitation by Project</th>
<th>Timeframe to address grievance</th>
</tr>
</thead>
</table>
| **First Tier: Site level**  | A person designated for the task need to be identified for the purpose by IPP and Electricity Service Provider. | • In the ESP or IPP or Contractor offices and the project site, there will be an Information Board providing details of the Grievance redress mechanism listing the names and contact telephones/emails.  
• Grievances can be registered by contacting the designated person through phone/email or by submitting a letter of complaint or by filling a Tier-1 complaint form. The Tier-1 form must be available online on the websites of the IPP or ESP or Contractor, Ministry of Environment (ME) and from the front office counters of the respective offices. (note PMU of ME should supply the form to respective parties).  
• For those who cannot properly write, a staff will assist in filling the complaint form and get it signed by the aggrieved party.  
• A formal receipt of the complaint will be provided to the aggrieved party.  
• The IPP/ESP/Contractor will screen the grievance to determine whether the grievance is related to ARISE project or not.  
• If it is related to the project, the aggrieved party will be informed in writing (copied to ME) how the case will be processed as per this grievance redress mechanism. This should occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter should be read to the aggrieved party. | 14 working days |
person in presence of a witness and the witness should declare their witness to this event.

- Alternatively, if it is not related to the project, the aggrieved party will be informed that it is not related to the project in writing (copied to ME) and will inform how the case will be handled. This communication will occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason), the issued letter will be read to the person in presence of a witness and the witness should declare their witness to this event.

- Where the grievance is related to the project, the IPP/ESP/Contractor will come up with a solution either by (i) discussing internally; (ii) joint problem solving with the aggrieved parties, ME and Island Council or; (iii) a combination of both options.

- The IPP/ESP/Contractor will communicate the final decision in writing, in terms how the grievance was handled to the aggrieved party within 14 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter should be read to the person in presence of a witness and the witness should declare their witness to this event.

- The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 10 days.

- If no acknowledgement is submitted from the aggrieved party then the decision will be considered as accepted.

- If the grievance is not resolved to the satisfaction of the aggrieved party within 14 working days of submission of the grievance to tier 1 then the aggrieved party may notify local council in writing, of the intention to move to tier 2.

**Second Tier:**

**Local Council** (Island or City Council or any other party which performs such a function)

- Local Council will be the second point of contact. Designated contact persons should be established within the Council with a designated contact number.

- Where the aggrieved party is not happy with the outcome of the decision by the IPP/ESP/contractor or where the aggrieved party is of the view that the council is not capable of justly solving the issue or where the grievance is not resolved within 14 working days the grievance can be upgraded to tier 2.

- In the council office and the project site there will be an Information Board providing details of the Grievance redress mechanism listing the names and contact telephones/emails.

- Grievances can be registered by contacting the local council directed contact person(s) or by submitting a letter of complaint addressed to the Mayor or Council president or by filling a Tier 2 Complaint Form. The Tier-2 form must be available online on the websites of the Island Council, Ministry of Environment (ME) and from the front office counters of the respective offices. (note PMU of ME should supply the form to respective parties).

- For those who cannot properly write, a staff will assist in filling the complaint form and get it signed by the aggrieved party.

- A formal receipt of the complaint will be provided to the aggrieved party.

14 working days
- The aggrieved party will submit a copy of the decision from tier 1 and the letter submitted raising their disagreement to decision where the reason for upgrading to tier 2 is the disagreement with the decision from tier 1.
- The aggrieved party will submit a copy of the grievance form submitted through tier 1 or the grievance letter submitted to council, where the reason for upgrading to tier 2 is due to lack of response from the IPP/ESP/Contractor.
- The council will screen the grievance to determine if the issues and concerns raised in the complaint falls within the mandate of the project.
- If it is related to the project, the council will inform the aggrieved party in writing (copied to ME) how the case will be processed as per this grievance redress mechanism. This should occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter will be read to the person in presence of a witness and the witness should declare their witness to this event.
- Alternatively, if it is not related to the project, the council will inform the aggrieved party that it is not related to the project in writing (copied to ME) and will inform how the case will be handled. This communication will occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason), the issued letter will be read to the person in presence of a witness and the witness should declare their witness to this event.
- Where the grievance is related to the project, the council will come up with a solution either by (i) discussing within the council; (ii) joint problem solving with the aggrieved parties, ME, ESP and the contractor/IPP or; (iii) a combination of both options.
- The council will communicate the final decision in writing, in terms how the grievance was handled to the aggrieved party within 14 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter will be read to the person in presence of a witness and the witness should declare their witness to this event.
- The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 10 days.
- If no acknowledgement is submitted from the aggrieved party then the decision will be considered as accepted.
- If the grievance is not resolved to the satisfaction of the aggrieved party within 14 working days of submission of the grievance to tier 2 then the aggrieved party may notify ME, in writing, of the intention to move to tier 3.
| Third Tier: Ministry of Environment and Energy | ME will forward the grievance to the Project Management Unit (PMU) of the Ministry. A dedicated number should be allocated to | • Where the aggrieved party is not happy with the outcome of the decision by the council or where the aggrieved party is of the view that the council is not capable of justly solve the issue or where the grievance is not resolved within 14 working days the grievance can be upgraded to tier 3. Grievances can be registered by contacting ME (directed to the contact person(s)) or by submitting a letter of complaint addressed to the Minister of Environment or by filling a Tier 3 complaint form.  
• For those who cannot properly write, the ME staff will fill a complaint form and get it signed by the aggrieved party.  
• A formal receipt of the complaint will be provided to the aggrieved party.  
• The aggrieved party will submit a copy of the decision from the council and the letter submitted to council raising their disagreement to decision where the reason for upgrading tier 2 is the disagreement with the council decision.  
• The aggrieved party will submit a copy of the grievance form submitted to council or the grievance letter submitted to council, where the reason for upgrading to tier 2 is due to lack of response from the council.  
• Ministry will forward all the grievances related to the project to the Project Management Unit.  
• PMU will screen the grievance to determine if it is related to the project.  
• If it is related to the project PMU will inform the aggrieved party in writing how the case will be processed as per this grievance redress mechanism. This should occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter should be read to the person in presence of a witness and the witness should declare their witness to this event.  
• Alternatively, if it is not related to the project, PMU will inform the aggrieved party that it is not related to the project in writing and should inform how the case will be handled. This communication should occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter should be read to the person in presence of a witness and the witness should declare their witness to this event.  
• Where the grievance is related to the project, the PMU will come up with a solution either by (i) Discussing in the project steering committee; (ii) joint problem solving with the aggrieved parties, the council, Energy Service Provider and the contractor/IPP (iii) undertaking site visits and holding onsite discussions or; (iii) a combination of all these options.  
• The PMU will be responsible to ensure that there is no cost imposed on the aggrieved person, due to the grievance mechanism at the third tier. | 14 Working Days |
• ME will communicate the final decision in writing, in terms how the grievance was handled to the aggrieved party within 14 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter should be read to the person in presence of a witness and the witness should declare their witness to this event.

• The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 10 days.

• If no acknowledgement is submitted from the aggrieved party then the decision will be considered as accepted.

In addition to the system established through the project, legal mechanisms are available for any aggrieved party if they are to pursue that option. In such cases, established legal practice as per the laws of the country will be followed. Moreover, if any request for information is made through RTI, the set procedure established under the act will follow and the information officer identified by the Ministry will attend to it, if a request is made to ME.

At the project offices (ME, ESP, IPP and Island Council) the information on the focal points responsible for implementation of this GRM needs to be displayed in the notice board and also on social media platforms in the following format:

<table>
<thead>
<tr>
<th>Description</th>
<th>Contact details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company:</td>
<td></td>
</tr>
<tr>
<td>To:</td>
<td></td>
</tr>
<tr>
<td>Address:</td>
<td></td>
</tr>
<tr>
<td>E-mail:</td>
<td></td>
</tr>
<tr>
<td>Website:</td>
<td></td>
</tr>
<tr>
<td>Telephone:</td>
<td></td>
</tr>
</tbody>
</table>
6.1 WORLD BANKS GRIEVANCE REDRESS PROCEDURE

Parties who believe that they are adversely affected by a project supported by the World Bank may also complaints directly to the Bank through the Bank’s Grievance Redress Service (GRS) (http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service).

A complaint can be submitted to the Bank GRS through the following means:

- By email: grievances@worldbank.org
- By fax: +1.202.614.7313
- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA

The complaint must clearly identify the adverse impact(s) caused by the project. This should be supported by available documentation and evidence. The complainant may also indicate the desired outcome of the complaint. Furthermore, the aggrieved party should identify a point contact for communications. Complaints submitted via the GRS are promptly reviewed to allow quick attention to project-related concerns.

In addition, project-affected communities and individuals may submit complaints to the World Bank’s independent Inspection Panel, which will then determine whether harm occurred, or could occur, as a result of the World Bank’s non-compliance with its policies and procedures. Complaints may be submitted to the Inspection Panel at any time after concerns have been brought directly to the World Bank’s attention, and after Bank Management has been given an opportunity to respond. Information on how to submit complaints to the World Bank Inspection Panel can be found at www.inspectionpanel.org.
During a five-year project it is likely that the situation on the ground might change. In this regard the project activities might change, project stakeholders may change, new stakeholders maybe introduced, the level of influence and interest of stakeholders may change. Thus, it is important to periodically review the Stakeholder Engagement Plan. Hence, it is proposed to review the plan during mid-term and if necessary, revise the plan.

As for reporting, minutes of all the public/stakeholder meetings held and log records of grievances received and how it was handled needs to be included as part of the project quarterly reports prepared and should be communicated by the PMU to the World Bank.

Furthermore, annual reports of stakeholder engagement activities undertaken by the project needs to be prepared and disclosed publicly through the website of the Ministry. This may be part of project annual report or maybe a standalone report.

Moreover, as highlighted previously the project steering committee and technical committee becomes a key reporting avenue to the most important stakeholders involved in the project. It also provides an opportunity for these stakeholders to influence project level decision making. Involvement of councils at this level of decision making is first time practiced in the Maldives and hence it is a positive change from previously implemented projects.

In addition, those staff who are involved in dealing with public needs to be provided with required necessary specialist trainings for successful implementation of this plan.
REFERENCE

Amendment to Local Government Act (Act no: 24/2019)

Environmental Impact Assessment Regulations (Regulation No: 2012/R-27)


Right to Information Act (Act no: 1/2014)


MEMORANDUM OF UNDERSTANDING

between

MINISTRY OF ENVIRONMENT

and

For commitment on mutual cooperation and support for the successful implementation of Accelerating Renewable Energy Integration and Sustainable Energy (ARISE) Project

REF NUMBER:

Dated: [.] 2019
THIS MEMORANDUM OF UNDERSTANDING (the “MoU”) is made on [.] 

BETWEEN:

MINISTRY OF ENVIRONMENT of the Government of Republic of Maldives, having its office at Green Building, Handhuvaree Hingun, Maafannu, Male’, 20392 in the Republic of Maldives (hereinafter referred to as “ME”).

And:

[ ], having its office at ____________, [ ], Republic of Maldives (hereinafter referred to as the “Council”).

(Collectively hereafter referred as “Parties”)

WHEREAS;

A. ME is desirous of executing a Memorandum of Understanding for commitment on mutual cooperation and support between Government Agencies, State Owned Enterprises and such other stakeholders necessary for the successful execution of Project(s) (as defined hereunder) carried out by or in connection with ME on behalf of the Government of Maldives (GoM), for the successful implementation of National Government Policies related to Energy; and

B. GoM, represented by ME with the support of STRATEGIC CLIMATE FUND and the INTERNATIONAL DEVELOPMENT ASSOCIATION (IDA) has initiated a project in the Maldives titled Accelerating Renewable Energy Integration and Sustainable Energy (herein referred to as “the Project” or ARISE) project, whereby private investors are invited to develop solar Photovoltaic (PV) systems on identified Site(s); and

C. For the implementation of the Project, ME and the Council has mutually identified the Site(s) to develop solar PV system in accordance with Project Framework Documents (as defined hereunder);

D. ME and the Council desire to execute this MoU for mutual support and cooperation in the successful implementation of the Project.

NOW THEREFORE, the Parties agree as follows;
1. Unless the context otherwise requires, in this MoU the following terms shall carry the meanings as set forth below:

1.1 “Applicable Law” means any and all local policies, statutes, laws, regulations, ordinances, rules, rulings, judgements, orders, decrees, Authorizations, licenses or other governmental requirements or restrictions or any interpretation or administration of any of the foregoing, in effect at the time of entering into this MoU or shall come in to force in the future, in the jurisdiction of Republic of Maldives.

1.2 “Authorizations” means permits, approvals or licenses required for the execution of the Project(s).

1.3 “Donor” means International Development Association of World Bank.

1.4 “GoM” means Government of Maldives constituted under the Constitution of Maldives and shall include all the ministries, departments, authorities, agencies and persons thereto.

1.5 “Government Agencies” means Ministry of Environment, Maldives Energy Authority, other government ministries, departments, State Owned Enterprises, statutory bodies and regulatory bodies with any jurisdiction over the implementation of the Project(s) and involved in the provision of Energy, and protection of the Environment under Applicable Law in the territory of the Republic of Maldives.

1.6 “GRM” means the Grievance Redress Mechanism prepared as may be agreed between the Parties for the purpose of resolving social issues or grievances arising out of or in connection with the Project Framework Documents.

1.7 “Investor(s)” means local and international private parties procured by GoM through ME or Ministry of Finance, to execute the Project.

1.8 “ME” means Ministry of Environment and shall include the Maldives Energy Authority administered under ME and other departments, authorities, agencies, representatives and persons thereto.

1.9 “Project” means ARISE, and any phase or sub-projects thereof.

1.10 “Project Framework Documents” means all bid documents, letters of tender, Agreements, and all such other documents and communications related to the Project.

1.11 “Site(s)” means the roof-top(s) and/or the terraces of the building(s) and such other public spaces mutually identified in [.] to be used for the purpose of Project. The locations, areas and dimensions are more fully described in the ANNEXURE hereto.

1.12 “Site Agreement(s)” means any such legal agreements executed to provide a valid and binding leasehold interest in, or an easement, right-of-way, license, or other right in favor of the Investor to use the Site(s) in order to develop the Project.

2. Parties recognize that the successful implementation of the Project is a collective responsibility of GoM and the parties to the Project Framework Documents, and the Parties further acknowledge that ensuring the necessary Site(s) for Investor(s) is critical for the successful implementation of the Project, and to that end;

2.1 the Council hereby undertakes to;

2.1.1 enter in to Site Agreement(s) with the Investor(s) in order to secure the Site(s) for the implementation of the Project, under the terms and conditions agreeable to the Parties; and

2.1.2 utilize any fees acquired through the Site Agreement(s) for the benefit of the Hinnavaru Island community, as maybe agreed between the Parties;
2.1.3 provide necessary support in facilitating adequate resolution of issues or disputes arising out of or in connection with the Site Agreement(s) and in the maintenance of Site(s), in accordance with the provisions of Project Framework Documents and GRM; and

2.1.3 fully comply with the provisions of the Site Agreement(s), and carry out such actions, without any undue delay, as maybe required by ME or any other party to the Project Framework Documents to enable such parties and GoM to comply with the Project Framework Documents in the performance of their obligations thereunder; and

2.1.4 fully cooperate with ME, the Investor(s) and such other parties to the Project Framework Documents where necessary, upon any reasonable request by such party in the performance of their obligations under the Project Framework Documents; and

2.1.5 keep ME informed of any and all communications related to, or which shall have an impact on the Project, exchanged between the Council and the Donor, Investor(s), Government Agency, any other party to the Project Framework Documents, or any other third parties; and

2.1.6 disclose to ME such other information related to the Project, without delay, upon any reasonable requests made by ME from time to time; and

2.1.7 carry out such actions on its part to enable the parties to the Project Framework Documents to obtain any and all Authorizations required for the execution of the Project under the said Documents.

2.2 ME hereby undertakes to;

2.2.1 provide necessary support in facilitating adequate resolution of issues or disputes arising out of or in connection with the Site Agreement(s) and in the maintenance of Site(s), in accordance with the provisions of the Site Agreement(s), the GRM and other Project Framework Agreements; and

2.2.2 ensure that no costs arising out of or in connection with the Project shall be borne by the Council, during the subsistence of the Site Agreement(s).

3 This MoU shall be effective from the date above mentioned and shall continue in full force unless terminated by either Party upon providing reasonable written notice to the effect or upon determination of the Site Agreement(s), as specified therein.
4 The Parties shall appoint a person(s) as a focal point in their organization for the implementation of this MoU and shall inform one another of such appointment.

5 All communications pursuant to this MoU, unless otherwise agreed, shall be exchanged in writing and delivered by person or via Government E-letter Management System (GEMS), email or legible facsimile transmission to the addresses set forth below, or to such other addresses, email or telefax numbers either Party duly inform in writing from time to time.

For ME

Name: Mr. Ajwad Musthafa
Designation: Permanent Secretary
Address: Green Building,
Handhuvaree Hingun,
Maafannu, Male’, 20392, Republic of Maldives
Email: ps.unit@environment.gov.mv
Fax: +960 3018301

For the Council

Name:
Designation:
Address:
Email:
Fax:

6 Any amendments to this MoU shall be in writing and as may be agreed between the Parties. The Parties may under mutual agreement include additional Site(s) to the ANNEXURE I hereunder from time to time through an Addendum to this MoU. The Parties shall ensure that any amendment shall not adversely impact the implementation of the Project.
7 Any issues or disputes arising out of, relating to, or in connection with this MoU shall be resolved through amicable negotiations among executives or management of the Parties appointed by the Parties for the purpose.

8 Parties hereby agree that it is their intention that this MoU shall be executed and delivered in good faith between the Parties and to the best interests of GoM and that if, either Party believes that the other Party is operating in breach of this MoU, or to the detriment of the interests of GoM, the Parties will use their best efforts to agree on such action as may be necessary to amicably remedy such breach or actions.

9 The Parties agree that they will hold in confidence the provisions of this MoU, all information, documentation etc., which comes to their knowledge in the course of implementing this MoU (the “Confidential Information”).

10 The Parties agree not to disclose any Confidential Information without the other Party’s prior written consent provided that the Confidential Information may be disclosed to any governmental or regulatory authority requiring such disclosure under law.

11 The Parties agree not to publicize at any time, including making public announcements or press statements or issuing press releases of any kind or release any information related to or about this MoU without the other Party’s prior written consent.

12 This MoU shall be governed by and construed in accordance with the laws of Republic of Maldives.
IN WITNESS THEREOF, the parties hereto, acting through their duly authorized representatives have caused this Memorandum of Understanding to be signed in on the day of .

**For and on behalf of ME**

Name: Dr. Hussain Rasheed Hassan

Designation: Minister of Environment

Date: 

**In the Presence of:**

Name:

ID Card Number:

Signature & Seal

**For and on behalf of the Council**

Name:

Designation:

Date: 

**In the Presence of:**

Name:

ID Card Number:

Signature

Signature & Seal
Accelerating Renewable Energy Integration and Sustainable Energy (ARISE) Project

Environment and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP) and Labour Management Procedure (LMP) Session Minutes

Date: February 20, 2020
Time: 1000-1200
Venue: 3rd Floor, Asaree Maalam, SHE Building
Meeting Attendees attached.

1. INTRODUCTION
The permanent secretary of Ministry of Environment (ME), Mr. Ajwad Musthafa kicked off by welcoming all officials to the ESMF session of ARISE and thanked everyone on behalf of the Ministry and Minister for their support towards the implementation of the project. He further informed of the announcement of 21MW Solar PV installation for pre-qualification in January 30, 2020.

2. AGENDA BRIEF
The Environmental and Social Safeguards Specialist of the project, Mr. Hamdhaan briefed the attendees on the agenda:
- Introductory video on ARISE
- ESMF, SEP and LMP explanatory video
- Q&A and feedback session

3. INTRODUCTORY VIDEO ON ARISE
The video comprised of explanations on the components of the project and its structure.

The Project Manager, Maumoon Khalid further highlighted the following:
- The project is in the formulation stage, however the 21MW sub-project was published through advance procurement under ASPIRE project.
- The financial structure of ARISE is yet to be finalised and consultations and discussions are ongoing regarding the matter.
- Introduction of Project team.
Legal Specialist of the project, Hassan Shiyam Mohamed informed that more atolls are to be included in the second sub project, which currently includes Laamu atoll and Lh. Naifaru.

4. **ARISE ESMF EXPLANATORY VIDEO.**

The video included details on the new framework and the following were covered:

- Explanation on the World Bank environmental and social standards that were relevant to the Project.
- Details of ESMF, including responsible parties for implementation and key impacts identified
- Labour management procedure details, including information relevant for direct and contracted workers
- Stakeholder engagement plan details including those who will be consulted and how vulnerable groups will be consulted.
- Grievance redress mechanism details

Hamdhaan highlighted the following

- Consultations and social surveys to be conducted in collaboration with Councils.
- Major monitoring works to be conducted with FENAKA and STELCO
- Training to be provided to the relevant staff of FENAKA, STELCO and Councils.

Shiyam stated that scope of the project is relatively large and the World Bank requires the project to be implemented with the engagement of stakeholders as much as possible. It is a requirement of WB to share the information on frameworks and standards as such with the stakeholders and to incorporate their feedback.

5. **Q&A AND FEEDBACK**

Thinadhoo Council, GDH. Thinadhoo

Ibrahim Riyaz, Vice President.

- There are a very limited number of technical staff in the islands. The council aspires to increase and build capacity of the employees in the islands in the technical area.
- The council inquired regarding the benefit of the project to the island community. More specifically on whether the electricity bill of individual households will be reduced. In addition, how the project plans to demonstrate the benefit of the project to the public.

**ME response:**

- As the Solar PV is installed through private sector investments, the WB provides guarantees. The investor will be installing and maintaining the installation for 15-20 years under IPP model. This will reduce the load to STELCO and FENAKA concerning maintenance and operation. The large scale of the project will enable the utility to purchase electricity at a lower price than diesel generation. This will ultimately reduce the fuel subsidies, which costs the government billions. The project is aimed to support the policies of the government, reduce the expenditure spent on fuel subsidies, ultimately benefiting the whole nation.
- Under component 4, capacity building is included where programs and trainings will be provided to utilities and more importance will be given to the employees of the selected islands. The WB also stresses on this matter.
- The current sites identified were selected with the consultations from the councils and will be utilised in multipurpose manner that will benefit the community.

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**Fonadhoo Council, L. Fonadhoo**

Fathimath Zaeema, Director

- Council expressed enthusiasm towards the project and inquired regarding the date of commencement of the project in Laamu Atoll.

**ME response provided:**

- The project has not been launched officially and the formulations works are ongoing. However, the subproject 1 has been published and the preliminary works required for the second subproject is underway. Before the bidding process can be started, further research and assessments are required. The project expects to start working on the bid document of the second subproject in Mid-2020 and published roughly around December 2020.

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**Addu City Council, Seenu Atoll**

Abdulla Sodig, Mayor

Mayor appreciated the initiative of the project and thanked the ministry on behalf of the council. Highlighting the existence of extensive electricity problems in the country, he made the following points.

- The impacts on the electricity bill with the project. This is a main question from the community.
- Highlighted that the maintenance of the 1.6MW installed under POISED project is poor.
- 300kw has been installed in individual households and the City is aspiring to install 500kw by the end 2020.
- Highlighted that the peak load of Addu is 8MW. ARISE project is installing 11 MW and FENAKA has planned to implement a diesel generation project. Mayor inquired how the two projects would be implemented simultaneously.
- Currently FENAKA lacks the mechanisms to monitor the cloud effect and there has been several occasions where the power has been interrupted due to cloudy environment.
- Mayor inquired whether proper research has been conducted as the most recent EIA of FENAKA indicated that grid upgradation was not necessary.
- Whether uninterrupted electricity provision would be guaranteed.

*Response from:*
FENAKA Corporation
Abdulla Nashith, Director, Technical Services and Green Energy Department

- Both projects from FENAKA and the Ministry requires to be streamlined and requires extensive research and consultations, which is ongoing.
- The growth rate of Addu City over the 15 years indicate that 18MW will be the peak demand of the City. As Solar PV is an intermittent source of electricity, FENAKA has a 20 MW diesel plant project planned for the City.
- Under the ARISE project, battery storage systems are also to be installed. Without the battery system, the cloud effect would cause a negative impact on the electricity provision.
- Assured that adaptable and integrated mechanisms will be implemented.

Ministry of Environment
Ahmed Ali, Director General, Energy Department

- The government currently spends 1 billion MVR for fuel subsidizing which has maintained the provision of electricity to the country at a sustained rate. This amount of subsidy is expected to be reduced with the large-scale solar PV installations around the country.
- Though the peak load of Addu is 8MW, the current grid system is old and since the loss is high, the feeder requires curtailing as the grid does not contain the capacity. With solar PV installations, the electricity will be generated for 5 hours roughly from the 24 hours of the day. Therefore, as backup, grid upgradation and well-functioning powerhouses needs to be built in Addu as well as Laamu atoll in order to guarantee uninterrupted electricity provision.
- The exact price of tariff cannot be determined now, however a reduction in the prices have been identified from the Phase and Phase 2 bids of ASPIRE.

State Electric Company
Hussain Ageel Hassan, Assistant Engineer

- Inquired regarding the buy down component of the project.
- Stated that if the battery is not installed simultaneously, there will be power interruption.

ME Response:

- The size of the battery for Addu City is not yet determined. The estimate is 11 MW hours.
- The required commitments and funds has already been secured from WB and for confirmation, investment requirements from the government is yet to be established.
- The 21MW project does not include a buy down component as the renewable energy rates globally is decreasing and the scale of the project will enable the investors to benefit economies of scale.

Maldives Civil Aviation Authority
Abdulla Mohamed, Director Airworthiness

- Inquired regarding the role of MCAA and airlines in the project.

ME Response:

- Included as a stakeholder as the Solar Sites selected in Kulhudhuffushi and Fuvahmulah is in airport boundary.
- Glare assessments were conducted as per international best practice.
- For site securing purpose, regional airport is engaged and MOU has been signed.

Kulhudhuffushi Council, HDH. Kulhudhuffushi
Ali Hashim, Vice President

- Highlighted that there has been no visible benefit of solar projects to the island community.

ME Response:

- According to the current schedule, Solar PV is expected to be installed and commissioned by December 2021.
- All of the installed solar is connected to the network and distributed by the utilities. Due to the solar PV, the tariff rates are decreased for the utilities. For an example: 21 cents kW/h for ASPIRE Phase 1 and 10.90 cents kW/h for Phase 2. Compared to worldwide solar PV installations, 21 MW is still a relatively small scale installation and does not have the capability to enable price reduction in electricity bills of individuals. However, such projects enables the utilities to sustain the rates without increasing the price and has a gradual decrease on the billions spent on subsidizing. The main aim of the government through such projects is to reduce the losses caused by diesel generation and guarantee uninterrupted electricity provision.
- Even though diesel generation plants projects are in the pipeline for islands, the renewable energy generated is prioritised to be utilised over the diesel-generated electricity.

Thinadhoo Council, GDH. Thinadhoo
Ibrahim Riyaz, Vice President.
- The council requested that the electricity generated from solar PV installation to be utilised for the island only and reduce the price of electricity bills of the island.

**ME Response:**

- Provision of electricity is a basic necessity. Hence, the government cannot apply different prices of electricity to different islands. It is a government policy to harmonize the electricity price for all islands. The cost of electricity production is lower in the capital city, Male’, compared to other islands. Cross-subsidizing method is adopted to maintain the same price in all islands.
- Under the Decentralisation Act, councils are conferred with more power and has the authority to decide on the utility provider; STELCO or FENAKA or private company. However, the electricity price requires approval from Maldives Energy Authority as the price needs to be consistent across the country.

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**Naifaru Council, LH. Naifaru**

Mamnooh Easa, Council Member

- Inquired regarding the commencing date of the project in Naifaru Island and whether the project consists a component for net metering.

**ME Response:**

- Naifaru island is planned to be included in the second sub-project of ARISE and a survey trip is scheduled for the Island in the upcoming months.

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**Ministry of National Planning and Infrastructure**

Fathimath Shaufa, Architect

- Inquired regarding the opportunities for private sector to install Solar PV in their rooftops.
- Informed that the Planning ministry can establish a mechanism to identify whether the building holds the structural integrity required for Solar PV installation.

**ME Response:**

Public spaces are prioritized over private as the space/site can be obtained for a cheaper price, which will reflect on the tariff rates. However, the project is exploring the options and suitable mechanisms for private parties.
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<tr>
<th>Name</th>
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<tbody>
<tr>
<td>Mohamed Sultah</td>
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<tr>
<td>Ali Osmian</td>
<td>Assistant Engineer</td>
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<td>Ali Osmian</td>
<td>Assistant Architect</td>
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<td>Ali Osmian</td>
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<td>Abdul Rashid</td>
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<td>Anna Ahmed</td>
<td>Project Manager</td>
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<tr>
<td>Muhammad Ali</td>
<td>CEO</td>
<td>CEO Office</td>
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**Meeting Attendance**

Date: 24-02-2025
Time: 13:00