

SOLOMON ISLANDS SUSTAINABLE MINING DEVELOPMENT TECHNICAL ASSISTANCE  
PROJECT (P173018)

A PRELIMINARY STAKEHOLDER ENGAGEMENT PLAN (DRAFT)

**May 2021**

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## ABBREVIATIONS AND ACRONYMS

<b>DFAT</b>	Department of Foreign Affairs and Trade (Australia)
<b>EIA</b>	Environmental Impact Assessment
<b>EITI</b>	Extractive Industry Transparency Initiative
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESCP</b>	Environmental and Social Commitment Plan
<b>ESF</b>	World Bank Environmental and Social Framework
<b>ESHS</b>	Environmental, Social and Health and Safety
<b>E&amp;S</b>	Environmental and Social
<b>SS&amp;E Specialist</b>	Social and Stakeholder Engagement Specialist (specialist in the PMU)
<b>ESS10</b>	Environmental and Social Standard (of the World Bank ESF)
<b>GM</b>	Grievance Mechanism
<b>LMP</b>	Labour Management Procedure
<b>MMERE</b>	Ministry of Mines, Energy and Rural Electrification
<b>NMP</b>	National Minerals Policy
<b>PDO</b>	Project Development Objectives
<b>PMU</b>	Project Management Unit
<b>POM</b>	Project Operational Manual
<b>SEP</b>	Stakeholder Engagement Plan
<b>SIG</b>	Solomon Islands Government
<b>SIMGov</b>	Solomon Islands Mining Governance Project
<b>SIMAC</b>	Solomon Islands Minerals Advisory Centre
<b>SPC</b>	The Pacific Community
<b>ToR</b>	Terms of Reference
<b>WB</b>	World Bank

# 1. Introduction

## 1.1. Project Description

1. The Solomon Islands Sustainable Mining Development Technical Assistance Project (P173018) is a World Bank financed program which aims to strengthen institutional capacity of SIG to achieve sustainable mining investment and benefit flows. The project components and activities are designed to support the challenges and gaps in the mining sector in Solomon Islands.
2. In 2017, the Solomon Islands Government launched the National Mining Policy. The Policy set out a vision of mining contributing to Solomon Islands' sustainable development through improved management of the sector leading to investment by responsible mining companies and more equitable benefit flows.
3. In October 2019, SIG requested further support to sustain the preparation of mining legislation and include mining sector technical assistance in its concessional borrowing program in the IDA19 cycle. The project will support SIG to strengthen capacity of regulatory institutions to implement revised mining and related laws consistently, transparently and effectively. To assist the Solomon Island Government (SIG) in realizing these benefits the World Bank has provided support since 2010 through the use of six small grants. The grants have supported engagement through forums and workshops and ultimately the completion of the National Mining Policy (NMP) in late 2016 and review of the Mining Act 2009.
4. The Solomon Islands Sustainable Mining Development Technical Assistance Project being prepared under the World Bank's Environment and Social Framework (ESF). As per the Environmental and Social Standard (ESS) 10 Stakeholders Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation
5. The Solomon Islands Sustainable Mining Development Technical Assistance Project comprises four components;
  - **Component 1- Mining Sector Regulatory Design.** The objective of the activities financed in Component 1 is to complete the design of the regulatory framework in line with the National Mining Policy following enactment of the Mining Act. Delivery would require procurement of policy and legal advisers across a range of domains and conduct of workshops and other relevant for a for a to conduct consultation and reviews.
  - **Component 2 – Mining Sector Regulatory Capacity.** The objective of the activities financed in Component 2 is to build capacity of government regulatory institutions to fulfill their functions effectively. Delivery would require procurement of policy advisers across a range

of domains, acquire and install critical equipment and provide skills development.

- **Component 3 – Operational Support.** The objective of the activities financed in Component 3 is to support MMERE to overcome near term operational challenges. Delivery would require procurement of a resident regulatory operations adviser, acquire and install critical equipment and provide skills development.

3.1 Advisory Services Resident Regulatory Operations Adviser to Director of Mines: provide immediate operational support where required to evaluate and approve mining related investments, compliance monitoring, including mine site inspections, support coordination among government agencies and offer staff development through training & mentoring.

3.2 Equipment & Buildings Transportation: Acquisition of vehicles at Honiara and provincial offices. Building Repairs and Refurbishment: Refurbishment of the HQ building in Honiara.

3.3. IT System Servers: Installation of hardware to support the IT functions of the HQ building in Honiara. Network: Installation of network equipment and software to connect the HQ building to provincial offices and other government offices.

- **Component 4 – Project Management.** The implementing agency for the project will be the Ministry of Mines, Energy and Rural Electrification (MMERE). A Project Office will be established for the proposed Project that will exercise project management responsibilities on MMERE's behalf during project implementation. Its scope would include financial management, procurement, monitoring and evaluation, as well as coordination among government entities. The Project Office will need to have expertise on management of externally funded technical assistance, the Bank's safeguards policies, IT and equipment specification, management of consultant delivered workflows, and reporting requirements.

6. The project will complement efforts that have already been committed by Solomon Islands Government and the World Bank providing ongoing technical assistance, financing and procurement support to the MMERE.
7. In terms of harmonization of legal and administrative functions between MMERE and other state agencies as specified by the Mines and Minerals Act 1990, a Minerals Board is established for the purposes of deliberating on applications for Mineral Rights, who then make recommendations to the Minister of Mines. Composition of the Minerals Board consist of Permanent Secretaries of MMERE; Ministry of Finance and Treasury, Ministry of Planning and Aid Coordination; Directors of Mines, Geology, Foreign Investment, Departments of Labour, Immigration; Ministry of Environment, Climate Change , Disaster Management and Meteorology; the Governor of Central Bank (CBSI) and the Attorney General
8. For the purposes of other important processes such as the formulation of a Mining Agreement, a negotiating team is formed comprises of Permanent Secretary for MMERE, Director of Mines, Attorney General, Chamber of Commerce, Provincial Secretary of the province where development is intended for, Governor of CBSI, Directors of Economic Reform Unit, Foreign Investment,

Environment, Ministry of Women, Youth, and Family Affair; Commissioners of Tax, Lands, Labour, Comptroller of Customs, legal advisors for landowners and province.

9. With this project, similar arrangements will be done to harmonize and align with all stakeholders of the project including state agencies. The MMERE will ensure that the executive board representation of all ministries responsible for each output to be part of consultations and board meetings.

## 1.2. Purpose of Stakeholder Engagement Plan (SEP)

10. The overall objective of this SEP is to define a program for stakeholder engagement around the Project, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project and any activities related to the project. The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities.
11. The key objectives of the SEP can be summarized as follows;
  - Provide guidance for stakeholder engagement in such way that it meets the standard of international Best Practices;
  - Identify key stakeholders that are affected, and/or able to influence the Project and its activities;
  - Identify the most effective methods, timing and structures through which to share project information, and to ensure regular, accessible, transparent and appropriate consultation;
  - Develops a stakeholder engagement process that provides stakeholders with an opportunity to influence project planning and design;
  - Establish formal grievance/resolution mechanisms;
  - Define roles and responsibilities for the implementation of the SEP;
  - Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.
  - Understand the stakeholder engagement requirements of National Minerals Policy (NMP) and of regulatory institutions to implement revised mining and related laws consistently, transparently and effectively.
12. To meet the consultation requirements, the project support unit will conduct consultations with the support of MMERE.
13. to engage with stakeholders during the preparation and implementation of this IDA-financed Project commensurate with the activities financed by the Project, consisting of (i) technical assistance and policy advisory work to support SIG to design and implement the regulatory framework for the mining sector at the national level with no direct location specific impacts; and (ii) office refurbishment works specified in the SEP;
14. to assure that the design of the mining sector regulatory framework by SIG and implementation thereof by MMERE and other government institutions corresponds to the stakeholder consultation standards and practices embodied in the World Bank's ESF, to include standards of stakeholder

engagement that all mineral right holders (whether public\* or private) shall adhere to as a condition of holding those rights.”

\*including any geo-data acquisition, exploration or mining projects financed and conducted by MMERE.

## **2. Regulations and Requirement for Stakeholder engagement**

### **2.1. World Bank Requirements**

15. The World Bank Environmental and Social Standard (ESS 10) on Stakeholder Engagement and Information Disclosure recognizes "the importance of open and transparent engagement between the Borrowers (e.g., MMERE) and project stakeholders as an essential element of good international practice." Specifically, the requirements set out by ESS10 are the following:

- Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope, and frequency of stakeholder engagement will be proportionate to the project's nature and scale and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable, and accessible information and consult with them in a culturally appropriate manner free of manipulation, interference, coercion, discrimination, and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrowers will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received, and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98).
- Borrowers will prepare a Stakeholder Engagement Plan (SEP) proportionate to the project's nature and scale and its potential risks and impacts. The SEP has to be disclosed as early as possible and before project appraisal. The Borrowers need to seek stakeholders' views on the SEP, including identifying stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrowers disclose the updated SEP. According to ESS10, the Borrowers should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the project's environmental and social performance promptly.
- Consultations engagement in the communities where potential mining activities have taken place or may take place, the inclusion of free prior and informed consent (FPIC) will be taken into account through the design of the regulatory framework.



## 2.2. Solomon Islands Requirements

16. The Solomon Islands Constitution, The Environment Act 1998 and The Environmental Regulations 2008 broadly support public participation. The Constitution provides for protection against discrimination. The Environment Regulations 2008 requires ensuring public involvement in any prescribed development; and specifies that any person may comment on an EIA, but do not specifically require that women's participation must be ensured.
17. Stakeholders' consultation, public disclosure, and grievance redress are less well covered in national regulations. The Environment Act 1998 and the Environment Regulations 2008 do not seemingly mandate public participation at the screening and scoping stages. While many of the above documents require disseminating information to the general public and confirm the right to make complaints, the resulting regulatory framework is only partly consistent with World Bank's policies for investment projects. First, there is no clear indication that public disclosure should occur before decision-making in investment projects. Second, existing legal instruments do not specify entry points that would allow for handling grievances and complaints. In this environment, international donor-funded projects have supported enhanced stakeholder engagement, but their approaches might need to evolve in the near future. International projects have relied intensively on facilitation by external consultants to implement public consultation processes.

## 2.3. Policy gap Analysis pertaining to Stakeholder engagement

18. The following table outlines the policy gaps and filling measures for stakeholder engagement under the project.

**Table 1: A summary of the policy gap pertaining to stakeholder engagement.**

ESS10	National Regulations	Gap	Gap-Filling Measure
<p>- Engage with stakeholders throughout the project cycle, with meaningful consultation; timely disclosure of relevant, understandable, and accessible information; consult in a culturally appropriate manner, involving:</p> <ul style="list-style-type: none"> <li>• Stakeholder identification and analysis;</li> <li>• Stakeholder engagement planning;</li> <li>• Disclosure of information</li> <li>• Consultation with stakeholders;</li> </ul>	<p>- Engage with stakeholders, public disclosure, and grievance redress are less well covered in national regulations. While many of the above documents require disseminating information to the general public and confirm the right to make complaints, the resulting regulatory framework is only partly consistent with World Bank's policies for investment projects. First, there is no clear indication that public</p>	<p>- Not include mandatory provisions for stakeholder engagement or information disclosure in project preparation</p> <p>-Discussion on complaints handling but does not explicitly mandate a project GRM</p>	<p>- Follow the Principles and requirements for stakeholder engagement, information disclosure, and grievance redress mechanism in the SEP and ESS10 requirements</p> <p>- In the future, amend the Environment Act 1998 and the Environment Regulations 2008 to require public consultation at the scoping and screening stages of EIA and set out procedures.</p>

<ul style="list-style-type: none"> <li>• Addressing and responding to grievances</li> <li>• Reporting to stakeholders</li> <li>• Establish a project Grievance Redress Mechanism</li> <li>• Maintain, and disclose as a part of the ESA a record of stakeholder engagement.</li> </ul>	disclosure should occur before decision-making in investment projects. Second, existing legal instruments do not specify entry points that would allow for handling grievances and complaints.		
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### 3. Brief summary of previous Stakeholder engagement Activities

#### 3.1. Lessons Learned on stakeholder engagement from the Solomon Islands Mining Governance (SIMGov) Project (P162737).

19. Key lessons learned on stakeholder engagement under the Solomon Islands Mining Governance Project (SIMGov) which apply to the Solomon Islands Sustainable Mining Development Technical Assistance project include:

- Stakeholder engagement and coordination -To ensure implementation of the project is proper and efficient, coordination and stakeholder engagement need to be in place with the government, World Bank Group, donors and Non-government partners. Additionally, the MMERE and the PMU will play key role in coordinating the implementation requirements of the project.
- Public Consultations: Consider women and youth participation in consultations. Mining developments may provide positive opportunities for Solomon Islanders in terms of jobs for women in administration, cleaning, and food services, as well as spin-off opportunities for local businesses and services. However, its negative social and gender impacts on women and youths must be considered and their participation in consultations on the legislation on mining is vital.<sup>1</sup> In addition to that, the consultation teams from MMERE must be fair represented for both male and female. Rural women are more confident to engage with female officers compared to male officers. As result, women will participate more in discussions and consultations on the mining legislations.

20. The Ministry of Mines, Energy and Rural Electrification's Mines Division conducted local level stakeholder's engagement in Guadalcanal, Isabel, Renbel and Choiseul provinces on the National Mineral Policy which was endorsed by the Cabinet. The consultations occurred in May 2019. The purpose of the public consultations was to provide information about the National Minerals Policy, Mining Bill and Solomon Islands Minerals Advisory CENTRE. A Questions and Answers sessions was contacted during the consultation to enable MMERE to improve the National Minerals Policy, Mining Bill and Solomon Islands Minerals Advisory Centre (SIMAC). Recommendations and lesson learned from these consultations were adapted for this SEP.

<sup>1</sup> Solomon Islands: Country Gender Assessment, ADB

### 3.2. Lessons learnt on National Consultations

21. There have been very limited stakeholder engagement activities done. The main challenge is due to strict restrictions imposed by the Solomon Islands Government in response to the COVID 19 pandemic. In April 2020, the Governor General declared the State of Emergency (SoE) authorizing the Prime Minister with the powers to undertake any actions necessary to initially prevent and then to combat a possible outbreak until August 2020. In August 2020, the SoE extended for the next four months until November 2020. In November 2020, the SOE extended again for the next four months. Choiseul, Guadalcanal and Honiara provinces were declared as emergency zones and initial curfews were introduced.
22. Local travels were restricted for some provinces including those with proposed Mining projects. The Solomon Islands geographical context poses issues and many logistical challenges as a result no detailed consultations took place.
23. The low availability, and poor performance of broadband internet in Solomon Islands limit having consultations with the provinces and the rural population this COVID 19 pandemic. Even where service is available, performance is poor, with the result that online/virtual meetings and consultations is impossible.

### 3.3. Summary of Stakeholder Engagement Activities to Date

24. Due to the State of Emergency (SOE) and the Solomon Islands Government restrictions related to COVID-19 pandemic, no stakeholder engagement activities done to date. The main challenges mentioned above in 3.2 remains. Due to strict restrictions imposed by the SIG in response to the COVID 19 pandemic.
25. Measures imposed under the SOE focused on controlling people`s movement, closing borders, restricting movements of vessels and aircrafts, allowing special funds to implement public safety measures, ministerial budget cuts and temporary close of public places.
26. Local travels were restricted for some provinces including those with proposed Mining projects. The Solomon Islands geographical context poses issues and many logistical challenges as a result no detailed consultations took place.
27. Government revenue performance has been weakening due to the pandemic and the government has cut ministerial budgets up to 50%, resulted in lack of funds from MMERE to support the public stakeholder consultations.
28. However, the stakeholder consultations are in working progress. Some consultations with Government Ministries have been conducted through telephone calls and emails given the constraints with COVID-19 travel restrictions and limited funding available for consultations due to pandemic-related ministerial budget cuts. Provincial government representatives will be meeting in Honiara for other related mining workshops and board meeting in May 2021, this will be an opportunity for MMERE to hold side consultations, in accordance with the SEP, during this time. The final Overarching Project ToR will be disclosed by MMERE on their website prior to project appraisal.
29. there are plans to have consultation on this SEP and the Environmental and Social Management

Framework (ESMF) under the project and will be consulted on and disclosed. The project includes considerable resources to implement the actions included in the Plan. The SEP will be continuously updated throughout the project implementation period, as required.

30. The MMERE website has been set up to provide extensive information to users. Consultations materials developed and will be on the website. However, with the issues on internet access, there might be very limited access by the provincial audiences. Information however, can be posted on the Ministry notice board and Solomon Island Government (SIG) portal (<https://solomons.gov.sb/>)
31. The SEP will continue to use a variety of engagement techniques to build relationships with stakeholders, consult and gather information from them, as well as disseminate project information when fund available and government restrictions related to the pandemic lessen.

**Table 2: List of Stakeholders to be consulted in May 2021**

<b>Organizations</b>	<b>Persons to be consulted</b>	<b>Positions</b>
Customs and Excise Division	Jim Sutton	Comptroller
Customs and Excise Division	John P Langi	
Customs and Excise Division	Sarah Wickham	
Ministry of Environment Climate Change Disaster Management and Meteorology (MECCDMM)	Melchior Mataki	Permanent Secretary
MECCDMM	Joe Horokou	Director
Foreign Investment, Ministry of Commerce, Industry, Labour and Immigration	Lynnette DaWheya	Director
Inland Revenue Division	Geroqe Tapo	Commissioner
Labour Division	Josiah Manehia	Commissioner
Labour Division	Damisulia O`ota	
Ministry of Lands, Housing and Survey	Allen McNeil	Commissioner
Mines Division - Ministry of Mines, Energy & Rural Electrification (MMERE)	Nicholas Biliki	Director
Petroleum, MMERE	David Natogga	Director
Energy, MMERE	John Korinihona	Director
Geology, MMERE	Douglas Billy	Director

Water Resources, MMERE	Charlie Bepapa	Director
Trade Disputes		
Attorney General's Chambers	John Muria	Attorney General`
Economic Reform Unit	Rictor Luaboe	
Ministry of Finance and Treasury	Mckinnie Dentana	Permanent Secretary
Ministry of Infrastructure Development	Mike Qaqara	Director
Extractive Industries Transparency Initiative (EITI)	Vincent Obimae	Head of Solomon Islands EITI National Secretariat
Ministry of national Planning and Development Coordination	Suzanne Sulu	Permanent Secretary
Immigration Division	Mason Fugui	Director
Immigration Division	Chris Akosawa	Deputy Director
Guadalcanal Province	Timothy Ngele	Provincial Secretary
Isabel Province	John Mark Lokumana	Provincial Secretary
Choiseul Province	Jeffrey Pakipota	Provincial Secretary
Renbel Province	Metcalf	Provincial Secretary
Central Bank of Solomon Islands	Dr Luke Forau	Governor
The Nature Conservancy	Willie Atu	
The Nature Conservancy	Madlyn Ero	
Solomon Islands Resources Company Ltd		
Solomon Islands Mining Company Ltd		
Gold Ridge Mining Ltd		
Landowners and affected parties of Kolosori mining-Ysabel		
Rep of the proposed and the current mining – Rennel		

32. So far three staff from the Mines Division (Director, Principal Tenement officer and Principal Economic Geologist) that team up to work on the consultation plan and part of the SEP individual consultations.

## **4. Stakeholder Identification, Analysis and Communication Methods**

### **4.1. Project Stakeholders**

33. Project stakeholders are defined as individuals, groups or other entities who have a role in the project or those who;
- (i) are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and
  - (ii) may have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.
34. Cooperation and negotiation with the stakeholders throughout the Project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups' interests in the process of engagement with the Project. Women and youth may have leaders of their own which may not be represented at the whole community representation level, and because of gender norms (including gender avoidance in some areas) male leaders may not be adept at facilitating women or youth participation.
35. Men and women community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Project-related information and as a primary communication/liaison link between the Project and targeted communities and their established networks. The legitimacy of such representatives can be as a result of their elected status and their informal widely supported standing within the community to act as focal point for interaction with stakeholders. Examples of such legitimate stakeholders representatives may include but not limited to:
- Elected officials of regional, local and village self-governance bodies;
  - Non- Elected leaders that have wide recognition within their communities, such chairpersons of local committees
  - Leaders of traditional community institutions such as chiefs and bigman,
  - Leaders of community based organization or faith based organizations, women and youth groups
  - Elders of affected communities
  - Religious leaders, including those representing traditional faiths
  - Teachers and other respected persons in the local communities
36. Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. Legitimacy of the community representatives can be verified by consultative processes with men, women and youth heeding their views on who can be representing their interests in the most effective way.

### **4.2. Stakeholder Identification and Analysis**

37. Stakeholder engagement process for the project will start with identification, mapping and analysis. It is anticipated that the Stakeholder Engagement Plan (SEP) will aid expound the stakeholder

procedure at the nation level for the forthcoming stages. This will guide the MMERE and allow complying with cited commitment both at national and international levels. The outlined criteria, modified to consider local specific conditions, are suggested to be used for identification of stakeholders.

- **Liability:** project implementation or on-going operations may result in legal, financial or other liabilities of the proponent to a social group;
- **Influence:** a social group may be able to substantially influence project implementation or ongoing operations;
- **Partnership:** there are opportunities for building partnership relations between the project developer and a given social group in the framework of the project implementation or ongoing operations;
- **Dependency:** project implementation may significantly affect a given social group, in particular, it may affect vital interests of its representatives if they are dependent on the project on-going operations in economic or financial terms;
- **Representation:** a social group may have a right to represent interests with regard to a project or on-going operations, and this right is legitimated through legislation, custom and and/or cultural specifics;
- **Expressed interest:** a social group and/or individual may express interest to a project or ongoing operations, and this group is not necessarily directly affected by the planned or current activities.

#### 4.3. A general list of identified stakeholder groups;

38. A general list of stakeholders groups identified is as follows;

- 1) **International Environmental and Societal NGOs:** This refers to representing international organizations with scientific understanding of the range or problems associated with the project.
- 2) **The National Government Ministries and Administration:** Refers to the government Ministries and Administration both at National and Provincial level with legislative and executive authorities to execute supervision and monitoring function of the project. The Project will build capacity of the SIG to achieve sustainable mining investment and benefit flows through; i) completing the design of a regulatory framework in line with the National Minerals Policy following enactment of a new Mining Act, ii) building capacity of government regulatory institutions to fulfill their functions effectively, and iii) supporting MMERE to overcome near term operational challenges. As a result, there will be greater inter-ministerial coordination to avoid duplication of efforts or contradictions of powers and processes.
- 3) **Academic, Research and Scientific Institutions:** Scientific understanding of the range or problems associated with the proposed project (s). Those with scientific approach to relevant issues and possible specialist suggestion for additional activity in project implementation.
- 4) **Non-Government Organizations/ Community Based Organizations/ Faith Based Organizations:** These organizations or groups that represents the interests of different interested parties and vulnerable groups at the National, Provincial and community level.
- 5) **Mass media** – these intermediaries for informing the general public about the plan activities of the project and for information disclosure in connection with the proposed project (s). including

local regional and national print and broadcasting media, digital/web based entities and their associations.

- 6) **The Provincial Administration and Government Ministries in the provinces:** In implementing the NMP and other legislations in relation to the project, the provincial governments and relevant national government ministries will be affected by having more responsibilities in term of regulations and operations related to mining.
- 7) **Landowners and local communities:** This PAP will be positively affected by and will have additional responsibilities including:
- strengthening access to legal advice, awareness training, financial management support and other services to enable effective participation by landowners, communities and other project impacted persons, through an independent advisory centre designed for this purpose.
  - Openness and transparency about all agreements made that impact on landowners, communities and other project impacted persons with multiple opportunities for monitoring and verification, bringing dealings in mineral resources into the daylight.
  - All key agreements (as well as EIAs) will be publicly available documents.
  - Heavier reliance on custom-appropriate land identification using traditional authority systems, facilitated by the government, to avoid capture by select interested parties.
  - Introduction of a multi-party Community Development Agreement framework for each mining project prior to mining development, to spell out the rights and obligations of each of the parties.
  - Adoption of representative community structures to ensure fair and equal representation and benefits in mining revenue and development projects, guided by the Community Development Agreement.
  - Standardization of model agreements, fees, and compensation rates to strengthen communities' ability to negotiate with companies.
  - Providing more safeguards to ensure that community decision making is inclusive and represents the views of men, women, and youth, to facilitate equitable development outcomes.
  - Access to employment and training opportunities stemming from the project.
- 8) **Business Communities/ Private Sector:** Refers to Economically interested business entities that can be potential customers to the project. Could include business owners and providers of goods, services and material within the project area and will involve in the project's wider supply chain or may considered for the role of project's supplier in the future. Individual entrepreneur in the project areas that can benefit from employment, training and business opportunities. Improving the mining legislations and implementing the NMP resulted in:



- Standardized Land Access Agreements, Mining Agreements, Community Development Agreements, forms, fees, creating an even playing field for all companies who can have confidence in their landowner and community dealings.
- An even playing field for all companies with comprehensive new transparency provisions and reporting requirements.
- Greater scrutiny of applications with prescribed due diligence checks to encourage reputable operators.

#### 4.4. Stakeholder Categorization

39. For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

##### 4.4.1. Affected Parties

40. Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project as well as their significance in decision making on mitigation and management measures. Specifically, the following individuals and groups fall within this category:

- Local Communities in and around planned project activities,
- Landowners
- Community members including Women, children and youths (including on adjacent and non-adjacent properties) whose socio-economic conditions may be directly affected by the proposed prospecting or mining operations
- Government officials including Municipal or provincial Administration in the area of the project, village administration, environmental protection authorizes.
- Non-Government Organizations or Community Based groups that represent local residents and other local interest groups and act on their behalf
- The relevant Government Ministries, agencies and institutions responsible for the various aspects of the environment and for infrastructure which may be affected by the proposed project including Ministry of Lands, Housing and Survey; Ministry of Environment, Climate Change, Disaster Management and Meteorology; Ministry of Mines, Energy and rural electrification; and Ministry of Forestry and Research.
- MMERE employees and contractors.

##### 4.4.2. Other Interested Parties.

41. The projects' stakeholders also include parties that may not experience direct impacts from the project but who are considered or perceive their interest as being affected by the project and could affect the project and the process of its implementation in some way, including:

- Mass Media – Solomon Islands Broadcasting Corporation (SIBC), and print media
- Participants of social media
- Politicians

- Other national and international non-governmental organizations (NGOs) that pursue environmental and socio-economic interest and may partner of the project.
- Development partners such as bilateral donors or multi-lateral financial institutions
- Businesses with international links/Private Sector
- The public at large.
- Government official permitting and regulatory agencies at the national and regional level, including environmental and social protection and labour authorities.

#### 4.4.3. **Disadvantaged / vulnerable individuals or groups**

42. It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups be adapted to take into account such groups or individuals particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits.
43. The vulnerability may stem from a person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other individuals or natural resources, etc. Engagement with these vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.
44. Within the Project, the vulnerable or disadvantaged groups may include and are not limited to the following:
  - Elderly
  - Women
  - Youth
  - Illiterate people
  - People with disabilities
  - Female-headed households
  - Children, living in poverty
  - Indigenous people
45. Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.
46. When updating the SEP, it should be prepared in a manner consistent with the ESS7 to enable targeted meaningful consultation with the IPs, including identification and involvement of IP communities and their representative bodies and organizations; culturally appropriate engagement processes; providing sufficient time for IPs decision making processes; and allowing their effective participation in the design of project activities or mitigation measures that could affect them either positively or negatively. The GRM should be culturally appropriate and accessible for IPs, taking into account their customary dispute settlement mechanism, different spoken languages, focus groups including a mix of men and women, identifying vulnerable group. Consultation will also consider the geographic context of the outer islands and difference between the islands. Some consultations for

women and men will consider applying focus groups, in communities due to cultural norms.

47. The World Bank Environmental and Social Standard (ESS7) The majority of the population in Solomon Islands is considered to be indigenous. While the projects will have no direct impacts on IPs, there is potential for studies and legislative revisions to have implications in future. No separate instrument is proposed, but relevant elements of the policy will be integrated into the SEP and the overarching project ToR, and implemented throughout the life of the Project. ESS7 related issues to be addressed better in the regulatory framework, required reforms and improved coordination between relevant agencies in the administration of the legislation and the associated capacity building needs across relevant agencies will be fully identified during the rapid institution-centered SESA. The project is designed to assist the SIG in mitigating the environmental and social risks associated with mining including those related to this standard.

48.

#### 4.5. Summary of Stakeholder Interest and Influence over the Project

Table 2 summarizes the level of interest in and potential influence over the project of the various stakeholder categories identified above. Categories color-coded in red will require regular and frequent engagement, typically face-to-face and several times per year, including written and verbal information. Categories color-coded in orange will require regular engagement (e.g., every half-a-year), typically through written information. Finally, categories color-coded in blue will require infrequent engagement (e.g., once a year), typically through indirect written information (e.g., mass media).

Table 3: Summary of Stakeholder Interest and Influence

Influence Interest	Ability or Likelihood to Influence or Impact the Project		
	High	Medium	Low

Level of Interest in the Project	High	<ul style="list-style-type: none"> <li>National government Ministries and agencies</li> <li>Provincial Governments</li> <li>Other national and international non-governmental organizations (NGOs)</li> <li>Government officials in the project area, village, administration, environmental protection authorities</li> <li>MMERE employees, Contractors and sub-contractors.</li> </ul>	<ul style="list-style-type: none"> <li>Members of Parliament &amp; Members of Provincial Assemblies</li> <li>Community Based Organizations</li> <li>Any other person (including on adjacent and non-adjacent properties) whose socio-economic conditions may be directly affected by the proposed projects</li> </ul>	<ul style="list-style-type: none"> <li>Landowners Local Communities in and around projects sites</li> <li>Other development partners</li> <li>Community members including Women, children and youths</li> </ul>
	Medium	<ul style="list-style-type: none"> <li>Development partners such as bilateral donors or multi-lateral financial institutions</li> <li>Businesses with international links</li> </ul>	<ul style="list-style-type: none"> <li>Mass Media – Solomon Islands Broadcasting Corporation (SIBC), and print media</li> <li>Participants of social media</li> </ul>	<ul style="list-style-type: none"> <li>Worker's Organizations</li> <li>Other Institutions and groups in the communities</li> </ul>
	Low			<ul style="list-style-type: none"> <li>Other project developers and their financiers</li> <li>General Public outside participating provinces</li> </ul>

## 5. Stakeholder engagement Program

### 5.1. Stakeholder Engagement Methods

49. In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- Openness and life-cycle approach:* public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation,

- interference, coercion or intimidation;
  - *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
  - *Inclusiveness and sensitivity*: exclusion of groups within stakeholders is analysed to support better communications and build effective relationships with all groups. The participation process for the projects is inclusive, as those with barriers to participation will be given extra support. These include vulnerable groups, in particular women, youth, people with disabilities and ethnic minorities.
  - *Sensitivity to stakeholders' needs* is the key principle underlying the selection of engagement methods, which can include gender or age segregated meetings, conduct of activities in different languages and formats and extra outreach to support disadvantaged groups to attend events or receive information.
50. The strict restrictions imposed by the Solomon Islands Government due to the growing threat of COVID-19 in the country with increasing positive cases has limited the project's ability to develop a complete SEP before this project is approved by the World Bank. This initial SEP was developed from information's provided by MMERE and disclosed prior to project approval, as the starting point of an iterative process to develop a more comprehensive stakeholder engagement strategy and plan. It will be updated periodically as necessary.

## 5.2. Summary of project stakeholder needs and methods, Tools and techniques for stakeholder's engagement.

51. The following are methods, tools and mechanisms for stakeholder engagement are provided in table 2 below;

**Table 4: Methods, Tools and Techniques for Stakeholder Engagement**

Methods/Tools	Description and use	Contents	Dissemination Method	Target Groups
<b>Information Provision</b>				
Distribution of printed public materials: leaflets, brochures, fact sheets of the project	Used to convey information on the Project and regular updates on its progress to locals and national stakeholders.	Printed materials present illustrative and written information on Project activities, facilities, technologies and design solutions, as well as impact mitigation measures. Presented contents are concise and adapted to a layperson reader. Graphics and pictorials are widely used to describe technical aspects. Information may be presented both in English and	Distribution as part of consultation meetings, public hearings, discussions and meetings with stakeholders, as well as mining site visits in the remote areas in the provinces. Placement at the provincial offices, MMERE, focal offices at the mining site and any public libraries at	Landowners of mining areas. Women's groups and networks in communities. Residents of the mining target or proposed mining projects, as well as wider stakeholders in Honiara and

		Pidgin for local and national stakeholders, and in English for international audience.	the Solomon Islands National University, University of the South Pacific Extension and the national library.	Solomon Islands.
Printed advertisements in the media	announcements, press releases, short articles in the printed media – newspapers- Solomon Star, Island Sun, Sunday Isles.	Notification of the project consultations or commencement of specific Project activities. General description of the Project and its benefits to the communities and nation.	Placement of paid information in local, and national printed media, including those intended for general reader and target mining audience	Landowners, and provincial governments
Radio-Solomon Islands Broadcasting, FM and or television- Our Telekom.	Talk back show, Weekly radio programme on SIBC , content for youth and women shows on SIBC and broadcast on TV.	Description of the Project, Project development updates, solutions for impact mitigation. Advance announcement of the public consultations or public events or commencement of specific Project activities.	Collaboration with media producers that operate in the region and can reach local audiences.	Land owners, women and youth provincial government and affected party and interested party
Visual presentations	Visually convey Project information to affected communities and other interested audiences.	Description of the Project and related solutions/impact management measures. Updates on Project development.	Presentations are widely used as part of the public hearings and other consultation events with various stakeholders.	Affected communities including women, NGOs) in in the project area, participants of the public hearings, consultations, rounds tables, focus group discussions and other forums attended by Project stakeholders. Authorities and other governmental bodies.

Notice boards	Displays of printed information on notice boards in public places.	Advance announcements of the public events, commencement of specific Project activities, or changes to the scheduled process.	Printed announcements and notifications are placed in visible and easily accessible places frequented by the local public, including libraries, village cultural centres, post offices, shop, local administrations.	Directly affected communities in the project area
<b>Information Feedback</b>				
Feedback & Suggestion Box	A suggestion box can be used to encourage direct stakeholders in the affected communities to leave written feedback and comments about the Project. Contents of the suggestion box should be checked by designated Project staff (MMERE- has a designated staff) on a regular basis to ensure timely collection of input and response/action, as necessary.	Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.	Appropriate location for a suggestion box should be selected in a safe public place to make it readily accessible for the community. Information about the availability of the suggestion box should be communicated as part of Project's regular interaction with local stakeholders.	Directly affected party in the mining and project areas of Influence. Other neighboring communities within the Project Area of Influence.
Dedicated telephone line (hotline) and talk back shows	Setting up a designated at the Project Implementation Unit and manned telephone line , at MMERE that can be used by the public to	Any issues that are of interest or concern to the local communities and other stakeholders.	Telephone numbers are specified on the printed materials distributed to Project stakeholders and are mentioned during public meetings. Project's designated staff should be	Local communities within the Project Area of Influence. Any other stakeholders and interested parties within

	obtain information, make enquiries, or provide feedback on the Project. Initially, telephone numbers of Project's specialised staff can be shared with the public, particularly staff involved in stakeholder engagement, public relations and environmental protection.		assigned to answer and respond to the calls, and to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration.	mining sites and general public.
Radio talk back shows	Setting up weekly radio program and quarterly talk back show on the project, adding content to pre-existing youth and women shows and allow the public to ask questions or a panel to answer with a moderator from SIBC or FM Stations.	On national Mining Bill, regulations and any issues that are of interest or concern to the local communities and other stakeholders.	Telephone numbers are specified on the printed materials distributed to Project stakeholders and are mentioned during public meetings. Project's designated staff should be assigned to answer and respond to the calls, and to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration.	Local communities within the Project Area of Influence. Any other stakeholders and interested parties within mining sites and general public.
<b>Consultations and Participation</b>				
Mining Site and provincial tours	Visits to mining Site and facilities organised for local communities, authorities and the media to	Legislations and regulation on mining and examples of Project's design solutions and approaches to managing impacts.	Targeted invitations distributed to selected audience offering an opportunity to participate in a visit to the Project Site.	Local communities within the mining areas and project Area of Influence.



	demonstrate Project solutions. Visitors are accompanied by the Project's staff and specialists to cover various aspects and to address questions arising from the public during the tour.		Limitation: possible safety restrictions on the site access during active construction works.	Responsible officer from SIG-MMERE and other SIG departments. Media groups. NGOs and other initiative groups.
Focus Group Discussions and Round Table Workshops	Used to facilitate discussion on Project's specific issues that merit collective examination with various groups of stakeholders.	Project's specific activities and plans, design solutions and impact mitigation/management measures that require detailed discussion with affected stakeholders.	Announcements of the forthcoming meetings are widely circulated to participants in advance. Targeted invitations are sent out to stakeholders.	Directly affected households in the Project Area of Influence, youth, people with disabilities, elderly, women, and other vulnerable groups.
Information centres and field offices	Project's designated venue for depositing Project-related information that also offers open hours to the community and other members of the public, with Project staff available to respond to queries or provide <b>clarifications</b> .	Project-related materials. Any issues that are of interest or concern to the local communities and other stakeholders.	Information about the info centre or a field office with open hours for the public, together with contact details, is provided on the Project's printed materials distributed to stakeholders, as well as during public meetings and household visits.	Directly affected communities in the Project Area of Influence and any other stakeholders and interested parties.
Public hearings for men, women and youth	Project representatives, the affected public, authorities, regulatory	Detailed information on the activity and/or facility in question, including a presentation and an interactive Questions & Answers session with the	Wide and prior announcement of the public hearing and the relevant details, including notifications in local, regional and	Men, women and youth in the Project Area of Influence. Other communities

	bodies and other stakeholders for detailed discussion on a specific activity or facility that is planned by the Project and which is subject to the statutory expert review.	audience where people can raise questions amongst peers .	national mass media. Targeted invitations are sent out to stakeholders. Public disclosure of Project materials and associated impact assessment documentation in advance of the hearing. Viewers/readers of the materials are also given free access to a register of comments and suggestions that is made available during the disclosure period.	within the Project Area of Influence. Residents in the Project Area of Influence advance of the hearing. Viewers/readers of the materials are also given free access to a register of comments and suggestions that is made available during the disclosure period
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### 5.3. Purpose and timing of stakeholder engagement program

52. An indicative stakeholder engagement plan is outlined below.

**Table 5: An indicative stakeholder engagement plan**

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
Design and implementation	Project design; project implementation progress	Coordination meetings	Government Ministries, Provincial Government, affected party and interested party.	MMERE
Design and implementation	Project design; project implementation	Correspondence by phone/email; one-on-one interviews; formal meetings; roundtable discussions	Government Ministries	MMERE
Implementation	Environmental, Social and Health and Safety, Worker GRM	Internal MMERE communication channels; Formal and on-the-job training;	MMERE officials/	MMERE

Implementation	E&S impacts, Health and management measures; GRM	Letters to provincial governments; community consultations; disclosure of Project documentation in a culturally appropriate and accessible manner	Affected communities (including vulnerable groups)	MMERE and PIU
Design	Environmental, Social and Health and Safety, Worker GRM	Disclosure of site based ESMP in selected provinces especially provinces with mining and proposed mining sites. Site meetings	Works contractors	MMERE and PIU
Design	Information on project activities; E&S impacts and management; GRM	ESMF consultation workshop; dissemination on MMERE website; local media	General Public	MMERE and PIU

#### 5.4. Proposed strategy for information disclosure

53. An indicative strategy of information disclosure is outlined below.

**Table 6: Indicative strategy of information disclosure**

Project stage	Target stakeholders	List of information to be disclosed	Methods and timing proposed
Design; Implementation	Government Ministries	Project design documents; work plan; procurement plan; progress reports	Internal GOS communication channels including letters/memos/emails and round table meetings
Design	MMERE officials/staff Mining workers, contractors	Activity information; ESMF and associated instruments; relevant procedures; LMP & Worker GRM	Internal MMERE communication channels including letters/memos/emails
Design	Affected communities (including all groups mentioned in Section 3.2,3.3 as well as those disadvantaged/vulnerable group	Project design information; ESMP; GRM	Traditional channels; consultation meetings; Information leaflets and brochures; Separate focus group meetings with vulnerable groups, as appropriate

	mentioned in Section 3.4s)		
Design/Implementation	Works contractors	Project design documents; ESMP and GRM	Email and hard copy
Design; Implementation	General Public	ESCP, ESMF (and associated instruments); SEP (and GRM)	MMERE website and dissemination of hardcopies at the MMERE office and other relevant project sites

### 5.5. Proposed strategy for consultation

54. The following should be considered when consulting with stakeholders:

- The COVID 19 pandemic restrictions imposed nationally the provincial and communities' level.
- Resources, time and cost of travel in country as Islands are sparsely located which incur high cost.
- Mode of transportation as some Islands are not reached by plane and flight schedules. For instance, there are no flights on weekends and very limited flights to provinces as impact of the COVID 19.
- Securing Stakeholder engagement. Solomon Islands is a country with diverse cultural norms and values can prevent stakeholders esp. women and youths from freely participating in meetings. Often there are conflicting demands within a community, and it can be challenging for a project to identify stakeholders who are representative of common interests. This might be avoided by employing local community liaison officers who are sensitive to local power dynamics, holding separate meetings with men, women and youth, and other adjustments to suit local conditions, which requires project proponents developing an awareness of the local context and implementing structures to support and foster effective stakeholder engagement.

55. The methods that will be used to consult with each of the stakeholder groups as follows::

**Table 7: Planned Stakeholder engagement activities**

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
Design and implementation	Project design; project implementation progress	Coordination meetings; Face to face meetings Emails Public meetings, training/workshops Social-media communications	Government Ministries	MMERE
Design and implementation	Project design; project implementation	Correspondence by phone/email; one-on-one interviews; formal meetings; roundtable discussions Trainings and workshops	Government Ministries	MMERE
Implementation	Environmental, Social and Health and Safety, Worker GRM	Internal MMERE communication channels; Formal and on-the-job training;	MOH officials/staff Healthcare Worker Health waste management workers	MMERE

Implementation	Information of laboratory and waste management facilities; E&S impacts and management measures; GRM	Letters to provincial governments; community consultations; disclosure of Project documentation in a culturally appropriate and accessible manner Trainings and Workshops	Affected communities (including vulnerable groups)	MMERE
Implementation	Environmental, Social and Health and Safety, Worker GRM	Disclosure of site based ESMP in selected provinces; Site meetings Trainings/workshop	Works contractors	MMERE
Implementation	Information on project activities; E&S impacts and management; GRM	ESMF consultation workshop; dissemination on MMERE website; MMERE hotline; local media Workshops/Training	General Public	MMERE

## 5.6. Proposed strategy to incorporate the view of vulnerable groups

56. The vulnerable groups within the Project area of interest can be grouped into categories of elderly, youth, women, with people with disabilities, women headed households and ethnic minorities. Barriers to participation will be analysed and accordingly additional measures will be put in place to encourage participation (Table 6).

**Table 8: Consultation methods for vulnerable groups**

Category	Organization	Leader	Method of consultation
People with disabilities	MMERE and Ministry of Women, Youths and family Affairs (MWYCF) NGOs (, San Isidro, Red Cross, People with Disabilities Solomon Islands) and health and faith-based organisations	MMERE	Focus Group meetings: Assisted transport to meetings. Focus group meeting with translator for those who are dumb and deaf.
Women including women headed households	MMERE, MWYCFA, Provincial Women's Development Units, Women Councils, NGOs	MMERE	Focus group meeting
Youths	MMERE, MWYCFA, Provincial Women's Development Units, NGOs	MMERE	Focus group meeting

## 5.7. Future Phases of Project

57. Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism.
58. Legacy issues related to unrehabilitated mine sites - The Project will support strengthening of mining, environmental and related legislation in line with the NMP to attract investment by better resourced and more responsible mining companies and to increase the capacity and effectiveness of regulatory institutions. This includes a heavy emphasis on improved mine safety and closure regulation and on building capacity to monitor and inspect mines, as well as assure that adequate financial provision is made to address mine closure and site rehabilitation liabilities.

## 5.8. Resources and Responsibilities for implementing stakeholder engagement activities:

### 5.8.1. The project implementation arrangements are as follows:

59. The MMERE will be the implementing agency for the Project. MMERE will be responsible for the following: Lead the Project's E&S risk management, develop activity level ToRs, ESMPs, oversight of consultants, Screen outputs for E&S risks, consultations & stakeholder engagement, monitoring & reporting and managing grievances. MMERE will establish a PMU. The PMU will be responsible for the day-to-day management of the project, including financial management, procurement, safeguard preparation, consolidation of workplan and budget, financial audit, ensuring compliance with environmental and social framework of the Bank, and monitoring and evaluation. Individual consultants with specific skill sets will be recruited to provide support to the PMU as needed.
60. Consultants will be recruited to ensure the project comply with project E&S documents, local law, and World Bank ESF and submit outputs for E&S screening.
61. World bank and the Environmental and Social team will Support MMERE to ensure E&S standards are adhered to during the project, Screen outputs for E&S risks and capacity building.

## 5.9. Grievance Mechanism

### 5.9.1. Objective

62. All project-affected and external stakeholders in the project will have access to a grievance mechanism that will receive, record, and review grievances, fairly and transparently and provide appropriate redress. The GRM deals with issues caused by construction works and any direct or indirect environmental and social impacts either due to the project activities and/or actions by the project team or the contractors employed by the project team. A separate mechanism to address worker grievances is covered in the Labour Management Plan (LMP). All stakeholders will be fully informed of the GRM, including how to submit grievances, the procedure for handling grievances, and the time within which a decision will be reached.
63. The design of the GRM employed the following fundamental principle:
  - **Openness and transparency** –The project will take all complaints and view them as opportunities for project improvement. This information, and a brief summary of the process for answering queries and managing grievances, will be published on the MMERE website, and a complaints/suggestion box will be at reception, and in consultation discussions particularly when involving provinces and other stakeholders. All complaints or grievances are entered into an

assigned database that tracks progress of each complaint/grievance. Complaints records (letter, email, record of conversation) are stored together, electronically or in hard copy. Each record has a unique number of reflecting year and sequence of received complaint

- **Fairness** – All grievances will be accepted as submitted in good faith and will be assessed on their merits without regard to the complainant's identity or status. All complaints will be evaluated objectively in relation to relevant regulations and operational guidelines of the project. Where applicable, the standards of the World Bank's ESF will be applied to the resolution of grievances.
- **Accessibility** – The Project will make every effort to ensure that all project-affected persons and other stakeholders have access to the GRM. To this end, the GRM will accept grievances submitted verbally, in writing, by any suitable means of communication. Complaints may be made by or on behalf of an individual, an organization, or an institution such as media.
- **Responsiveness and effectiveness** – The Project will endeavor to process and respond to all grievances in a timely and effective manner. Receipts of all submissions will be acknowledged within 2 working days. Consideration of valid complaints by the GRM will occur within 30 working days, giving time for collecting and examining evidence if required. Additional time may be required for negotiation with aggrieved parties, but the resolution should not exceed 45 working days.
- **Anonymity and confidentiality** – Individuals or institutions submitting complaints may request anonymity, in which case their names will not be made public. Confidentiality will also be observed during the period when the GRM is considering a case (e.g., the source and any person, contractors should be protected). Complaints can be anonymous. To make a complaint or grievance, there are various ways to get in touch:
  - By Phone: +677 21523
  - By email: Nicholas Biliki (NBiliki@mmere.gov.sb)
  - By mail: Ministry of Mines, Energy & Rural Electrification, P.O. Box G37, Honiara
  - In person: Ministry of Mines, Energy & Rural Electrification, Geology Area, Lengakiki. Give to Mr. Nicholas Biliki or put in complaints/suggestion box at reception.

64. The following are persons involved in the complaints process and their supporting roles and responsibilities with prior approval and notification from the Director of Mines Division:

- Focal Point for managing the Mines Division Complaints Process: Mr. Ishmael Khegrasopa, Principal Economic Geologist for the Mines Division.
- Person who will manage the database and record keeping: Mr. Ishmael Khegrasopa, Principal Economic Geologist.
- Person who will answer simple queries and manage simple complaints: Mr. Ishmael Khegrasopa, Principal Economic Geologist.
- Person who will manage difficult complaints or grievances: Mr. Nicholas Biliki, Director of Mines, or Deputy Director of Mines Person who will prepare report for Minerals Board reporting: Mrs. Krista Tatapu, Principal Tenement Officer for the Mines Division.

65. Grievance Committee will be formed on an ad hoc basis for complex or significant grievance management. This will be made up of appropriate senior officials (Undersecretary level or above) from the following:
- Ministry of Mines, Energy and Rural Electrification
  - Ministry of Lands, Housing and Survey
  - Ministry of Environment, Climate Change, Disaster Management and Meteorology
  - Ministry of Finance and Treasury
66. All simple complaints and grievances must aim to be closed out within 1 month. Complex complaints should aim to be closed out within 3 months or deferred to the Grievance Committee.
67. All complainants have the right to use the courts of Solomon Islands at any time to seek resolution.
68. The Project Coordinator will make adjustments to consultations, the GRM, community engagement, project implementation and other aspects as necessary to avoid future complaints and grievances.
69. Ministry of Mines, Energy and Rural Energy (MMERE) Level Resolution: In addition to the above Mines Division level GRM, communities and individuals who believe that they are adversely affected by any Mines Division supported mining projects may submit complaints to the Mines Division Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns.
70. Mining Project affected communities and individuals may submit their complaint to the Mines Division independent Inspection Panel which determines whether harm occurred, or could occur, as a result of Mines Division non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the Director of Mines attention, and MMERE Management has been given an opportunity to respond.

## **6. Monitoring and Reporting**

### **6.1. Involvement of stakeholders in monitoring activities**

71. The project PIU and MMERE will maintain a database and activity file detailing all public consultation, disclosure information and grievances collected throughout the project, which will be available for public review on request.
72. Stakeholder engagement should be periodically (midterm and end of project) evaluated by senior management of MMERE, assisted by PIU. The following indicators will be used for evaluation:
73. Level of understanding of the project stakeholders; including any exclusions based on gender, age or ethnicity
74. Annual grievances received and how they have been addressed; and
75. Level of involvement of affected people in committees and joint activities and in the project itself.
76. In order to measure these indicators, the following data will be used:



- 77. Issues and management responses linked to minutes of meetings;
- 78. Monthly reports;
- 79. Feedback from primary stakeholder groups (through interviews with sample of affected people);
- 80. Commitment and concerns register and
- 81. Grievance register.

## 6.2. Reporting back to stakeholder groups

- 82. The SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP.
- 83. Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.
- 84. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:
  - MMERE's website or the publication of a standalone annual report on project's interaction with the stakeholders.
- 85. Final details will be outlined in the updated SEP, to be finalized within 30 days of the effective date.