

# Increasing socio-ecological resilience to climate change in the Barren Isles through protection and restoration of key ecosystems and diversified livelihoods.

## Stakeholder Engagement Plan and grievance mechanism

Blue Ventures Madagascar

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# Table of contents

|   |    |
|---|----|
| 1. Introduction   | 5  |
| 1.1. Purpose of the Stakeholder Engagement Plan   | 6  |
| 1.2. Brief description of the project   | 7  |
| 2. Stakeholder Identification and Analysis  | 9  |
| 2.1. Stakeholder identification   | 9  |
| 2.2. Stakeholder analysis   | 12 |
| 2.2.1. Consultation of the first version of ESMP and legal texts  | 13 |
| 2.2.2. Consultation of the websites   | 13 |
| 2.2.3. Stakeholders' interview  | 13 |
| 2.2.4. Validation of the stakeholders' engagement plan and the conflict management and complaint resolution mechanism at the regional partners' meeting | 13 |
| 3. Stakeholder engagement   | 14 |
| 3.1. Stakeholder engagement already undertaken  | 15 |
| 3.2. Planned stakeholder engagement and disclosure during project implementation  | 18 |
| 3.3. Informed Consultation and Participation  | 21 |
| 3.3.1. Background to ICP  | 21 |
| 3.3.2. Project ICP Process and groups   | 21 |
| a. MEDD as the supervisory Ministry   | 21 |
| b. The regional fisheries and fisheries resources service /CSP  | 22 |
| c. Ministry of Fisheries and Blue Economy (MPEB)  | 23 |
| d. Ministry of Tourism  | 23 |
| e. Regional Public Health Directorate (DRSP)  | 23 |
| f. Gendarmerie  | 24 |
| g. Melaky Region  | 24 |
| h. The Communes of Maintirano, Betanatanana and Soahany   | 24 |
| i. The Fokontany where the project is taking place  | 24 |
| j. Blue Ventures NGO  | 24 |
| k. The MPA co-managers  | 25 |
| l. The Vezo Miray Iles Barren Association   | 25 |
| m. The "Olobe"  | 26 |
| n. VOI  | 26 |

|  |    |
|--|----|
| 4. Grievance Mechanism                                 | 27 |
| 4.1. Introduction                                      | 27 |
| 4.2. Purpose and scope of the Grievance Mechanism      | 28 |
| 4.3. Eligibility                                       | 29 |
| Project staff and contractors:                         | 29 |
| 4.4. Grievance Procedures                              | 29 |
| 4.5. Informing Stakeholders about the Grievance System | 32 |
| 4.6. Serious Incident Reporting                        | 32 |
| 4.7. Maintaining Records and Monitoring Actions        | 33 |
| 5. Monitoring, Evaluation and Reporting                | 33 |
| Annex 1: Stakeholder register                          | 34 |
| Annex 2: Template for Public Grievance Form            | 35 |
| Annex 3: Template for a Serious Incident Report        | 36 |

## List of Tables

|  |    |
|--|----|
| Table 1 - Blue Action Fund requirements for Stakeholder Engagement           | 6  |
| Table 2 - Stakeholder  | 12 |
| Table 3 - Stakeholder engagement   | 18 |
| Table 4 - Planned stakeholder engagement                                     | 22 |
| Table 5 - Blue Action Fund requirements for Grievance Management             | 34 |
| Table 6 - Good practice of the ESMS Grievance Mechanism (Source: IUCN 2020a) | 35 |

## List of figures

|   |    |
|---|----|
| Figure 1 - Location of the project activities | 11 |
| Figure 2 - A grievance procedure              | 38 |

# 1. Introduction

In response to Madagascar's commitment at the 2014 Parks Congress in Sydney, to increase the size of its MPAs, Blue Ventures, in collaboration with the Ministry of Environment and Sustainable Development – has been promoting the creation of an MPA for the Barren Islands since 2009. The NPA, planned for a total area of 431,700 ha – is located in the west of Madagascar. It straddles the Districts of Maintirano and Antsalova of the Melaky Region, in the Province of Mahajanga. The future MPA, which harbours an important diversity of ecosystems including a large reef complex, large areas of seagrass beds, mangroves, estuarine marshes, islets and coastal dunes set in dense semi-humid forests that are feeding, breeding and protection areas for a large number of endangered species, including marine turtles, sharks and birds – is proposed for category VI (Natural Resource Reserve) with collaborative co-management governance.

The process of creation started with a feasibility study, passing through an awareness rising on the Protected Area and various technical and scientific studies. In 2014, the future MPA had its temporary protection status by Inter-ministerial Order No. 30.441/2014 of 10-10-14. In accordance with the MECIE Decree and the provisions of the COAP and subsequent texts relating to the creation of PAs, an EIA, including an SEA and ESMP – is mandatory for any project to create a PA.

This stakeholder's engagement Plan, including a conflict management mechanism – is part of the ESMP as specified in the Guide for the Conduct of Environmental and Social Impact Assessment for all New Protected Area Creation Projects (MINENVEF/ONE, 2006).

This plan has been developed using a participatory approach, to ensure that the activities and expectations of each party are understood by and appropriate for each stakeholder. Stakeholders include all entities and individuals that may be affected by the project or have an interest in the MPA project.

Moreover, the purpose of the Stakeholder Engagement Plan (SEP) is to demonstrate how “Increasing socio-ecological resilience to climate change in the Barren Isles through protection and restoration of key ecosystems and diversified livelihoods” has engaged with stakeholders during project design (design of the concept and full proposal), and the proposed stakeholder engagement process that will be followed during the Project's planning and implementation.

Stakeholders are individuals or groups who are affected, or likely to be affected by the Project (“Project-Affected People/ Parties”) and/or may have an interest (stake) in the project (“Interested Parties”), or be able to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organisations and groups with special interests, the academic community, or other businesses<sup>1</sup>.

The stake that each of these different individuals or groups will have in a project varies. This requires analysing and understanding the degree to which stakeholders are affected by a project (and therefore the type of engagement that is expected as a result, from a safeguards perspective), and the degree to which a stakeholder has an interest and/or influence in the project (and therefore the type of engagement that is required to ensure a successful and sustainable project).

Stakeholder engagement refers to a process of sharing information and knowledge, seeking to understand and respond to the concerns of others, and building relationships based on collaboration. Stakeholder engagement is an on-going process that builds a positive relationship between the project and its stakeholders.

The intensity of stakeholder engagement can vary as a function of the likely level of impact of a project on stakeholders. The Blue Action Fund ESMS distinguishes between Free Prior and Informed Consent, Informed Consultation and Participation, Consultation, and Information Sharing, as examples of different types of engagement<sup>2</sup>, as indicated in Section 2.2. However, these are minimum requirements, and some projects will adopt more rigorous stakeholder engagement than might be required by the Standards, for other reasons. Blue Action Fund is supportive of this broader need and application for FPIC, and any culturally and socially appropriate forms of engagement that increases community ownership and engagement in marine conservation efforts, and manages potential E&S risks and impacts.

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<sup>1</sup> IFC. 2007. *Stakeholder Engagement: A good practice handbook for companies doing business in emerging markets*. Pp. 10.

<sup>2</sup> Refer to the Blue Action Fund ESMS Glossary of Terms and Section 2.2 below for more details on the four above mentioned categories of engagement.

Blue Action Fund is committed to complying with national and international stakeholder engagement and disclosure requirements. The SEP is a public document and will be disclosed to all Project Affected People and other project stakeholders. It is also a living document that will be revised and updated to account for the ongoing stakeholder engagement activities and potential changes in the Project. In Blue Action-funded projects, this safeguard instrument is annexed under the Environmental and Social Management Plan (ESMP), which serves as the umbrella Safeguard Instrument. The SEP should complement the ESMP, and be developed and applied in conjunction with the Project’s Grievance Mechanism. The Blue Action Fund requirements for stakeholder engagement, and timings for these, are detailed in Table 1.

Table 1 - Blue Action Fund requirements for Stakeholder Engagement

| Requirement                           | Project design     |                | Project implementation |                           |                       |
|---------------------------------------|--------------------|----------------|------------------------|---------------------------|-----------------------|
|                                       | Concept note stage | Proposal stage | Inception Phase        | Annual (or end of Year 1) | Project closing phase |
| Stakeholder identification            | Required           | Na.            | Na.                    | Na.                       | Na.                   |
| Stakeholder analysis and consultation | Na.                | Required       | Na.                    | Na.                       | Na.                   |
| Stakeholder engagement                | Na.                | Required       | Required               | Required                  | Required              |
| Disclosure and reporting              | Na.                | Required       | Required               | Required                  | Required.             |

1.1. Purpose of the Stakeholder Engagement Plan

This plan is a living document that has been developed progressively as the realities of the site evolve. It has been drawn up with the aim of managing the gaps that could compromise the achievement of the objectives of the MPA, both in its creation and its management, in the desired timeframe.

In this sense, quite often, a problem that arises is that without good organization, the various stakeholders are somewhat confused about who does what? On whose behalf? However, from a management perspective, any procrastination, duplication or two entities intervening, each in their own way, on the same action, can negatively impact the process of creating or managing the MPA. It is therefore advisable to specify the roles and responsibilities of each stakeholder to ensure better organization of activities.

The overall aim of the SEP is to ensure that a timely and appropriate approach is taken to engagement with stakeholders. The SEP outlines how the Project (not only the creation but all projects for MPA management) will further engage the various stakeholder groups throughout project design and implementation in order to ensure that their views and concerns are heard and taken into account. The purpose of having a SEP is to ensure a successful and sustainable project, and alignment of the project with international good practice approaches to stakeholder engagement, including the World Bank Environmental and Social Framework (WB ESF 2017), particularly Environmental and Social Standard 10 (ESS10).

The approach which was used in developing the stakeholder’s engagement plan and the conflict management and complaints mechanism went through several stages:

- Consultation of previous documents and legal texts;
- Consultation of the Ministries’ websites;
- Stakeholders’ Interview;
- Stakeholders’ preparation;
- Validation of the stakeholders’ engagement plan and the conflict management and grievance mechanism at the regional partners' meeting

The overall aim of the SEP is to ensure that a timely and appropriate approach is taken to engagement with stakeholders. The SEP outlines how the Project (not only the creation but all projects for MPA management) will further engage the various stakeholder groups throughout project design and implementation in order to ensure that their views and concerns are heard and taken into account. The purpose of having a SEP is to ensure a

successful and sustainable project, and alignment of the project with international good practice approaches to stakeholder engagement, including the World Bank Environmental and Social Framework (WB ESF 2017), particularly Environmental and Social Standard 10 (ESS10).

For the project, the objectives of the SEP are to:

1. Identify and analyse stakeholders during the project design, listing all relevant stakeholders and analysing each in relation to their potential interest in and influence on the project, as well as the project's potential impact (positive and negative) on them;
2. Actively obtain input from a broad spectrum of stakeholders at local, regional, national and international levels, with particular emphasis on Project Affected Peoples, through meaningful consultation;
3. Provide stakeholders with adequate, clear, timely and consistent information regarding the Project and project activities, including impacts and opportunities that may arise and proposed management measures/ solutions, as well as the manner in which they can participate in this process;
4. Provide sufficient opportunity for stakeholders to raise issues, make suggestions and voice their concerns and expectations with regard to the Project;
5. Build capacity among stakeholders to enhance their ability to interpret the information, as well as to contribute their issues of concern and suggestions for enhanced benefits;
6. Working directly with the stakeholders and in particular, the Project Affected Peoples, throughout project implementation to ensure that public concerns and aspirations are consistently understood and considered by the project; and
7. Provide stakeholders with timely feedback on whether and how their inputs were incorporated into project decisions particularly relating to management measures and strategies for enhancing benefits, and including the effective and timely management of any grievances related to the project.

Overall, the SEP will assist with building strong relationships between the project and its stakeholders, creating an atmosphere of mutual understanding, respect, trust and collaboration. Active engagement will also give the Project Affected People a sense of ownership and/or a stake in decision-making process pertaining to the Project, thereby allowing the Project to gain and maintain a social licence to operate and to grow. Importantly, regular engagement will help with managing expectations of the Project Affected People and other stakeholders from the beginning of the Project and throughout implementation, thereby ensuring that any expectations are realistic and factually informed.

## 1.2. Brief description of the project

This project will protect and restore biodiversity in the Barren Isles, increasing socio-ecological resilience and supporting coastal communities to face climate breakdown.

Madagascar ranks 164 out of 181 countries in the Notre Dame-Gain-Index, reflecting the country's significant climate vulnerability and lack of readiness. This is epitomised by the communities of the Barren Isles, who depend on marine natural resources and ecosystem services in every aspect of their lives. With a reported 80-95% decline in fish catches in the last 10 years, intensifying cyclones and periods of drought, increasing sea temperatures and sea level rise, and significant coastal erosion, the communities that depend on low-lying offshore Barren Isles are on the front lines of the climate emergency. There is an urgent need to protect and restore these critical ecosystems by obtaining protected MPA status for the Barren Isles, whilst investing in helping small-scale fishers in the region to adapt, reduce risk, and build resilience.

The project aims to obtain permanent protected area status as a category VI MPA for the Barren Isles with an active and trained local management association. The project's outcome will be improved resilience of climate-relevant ecosystems (coral reefs, sea grass, and mangrove ecosystems) through increased protection and management. Improved livelihoods, increased financial stability, and access to health care will enable local communities to participate in management of the MPA and adhere to its rules. This will lead to the sustainable use of fisheries, reducing climate change-related risks, and increasing the resilience of vulnerable coastal communities.

Through inclusive local governance and community-based sustainable fisheries and mangrove management, outputs 1 and 2 will protect and restore coral reefs, seagrass, mangroves, and fisheries. The MPA will ban destructive fishing practices, protecting reefs and seagrass, and include NTZs, allowing fish stocks to recover. Mangrove conservation and planting will sequester CO<sub>2</sub>, provide coastal stabilisation, and help capture sediment run off. Ecosystems that are rich and abundant in species are more able to continue functioning under the stresses and shocks of climate change. They also stand a better chance of being able to adapt to the changing environment.

Output 3 will build the socio-economic resilience of coastal fishing communities through improved and new livelihoods, increased women's economic and social empowerment, financial inclusion, alternative cooking energy sources, basic health services and stronger social networks.

Output 4 will scale and share viable solutions identified during the project via WIOMSA in the Indian Ocean region and through the MIHARI network, which represents Malagasy fishing communities. These networks will increase impact across Madagascar and the WIO and raise awareness of the value of investing in local EbA work.

Under Output 3, this project will build the socio-economic resilience of coastal fishing communities in the Barren Isles. The target beneficiaries include 2,000 fishers and their estimated 4,071 family members (6,071 total, from 1,286 households), who live in 30 villages within and in the buffer zone of the MPA.

The communities inhabiting the Barren Islands MPA are spread over different coastal and island villages and camps, located between the town of Maintirano in the north and the village of Soahany in the south. In addition, the archipelago has been at the center of an important phenomenon of migration for several decades. The current population and its ethnic roots were formed as a result of different waves of migration. The ethnic groups that make up the archipelago are as follows:

- The Vezo-Sakalava - The oldest in the area, considering these sacred islands, the heritage of their ancestors. Originally, these fishermen concentrated their fishing activities near the coast with occasional visits to the islands.
- The Vezo-Sara, originating from the surroundings of Anakao and St-Augustin in the southwest of Madagascar, began to migrate to the Barren Islands in the 60s. This group began to come annually to fish in the islands between April and November, then ended up settling permanently on the coast at Maintirano. They continue to live seasonally on the islands between March and November.
- The migrant Vezo from the South (regions of Tulear, Morombe, Morondava - between the Vezo-Sara and Vezo Sakalava) - began to flow in large numbers around the 1990s, and the trend has increased since with the growing decline of resources in the southwest. These fishermen live on the islands seasonally before returning home during the rainy season. However, some of these Vezo have begun to live on the islands annually.

The Barren Isles' remoteness makes the archipelago a challenging place to work. Access to inland urban markets are limited and there are few livelihoods other than semi-subsistence fishing and minimal farming. Throughout the islands and neighbouring mainland coastal villages, communities face a multitude of unmet health and social needs. One in five women in Madagascar report an unmet need for family planning and the child mortality rate is 180 per 1000 live births (compared to a global average of 39). Living in precarious camps on the islands and along the coast, most families in the Barren Isles have no access to alternative livelihoods, education, freshwater and even basic health care. BV's 2019 census revealed that over 36% of people living in these communities have no education at all, and only 22% have secondary level education or above.

AKF conducted a scoping study in October 2020 in select target villages. This study included observation and focus group interviews in several communities, with both women- and men-only groups as well as a fishermen association. The topics covered were: taboos in the community, existing public/community infrastructure, existing CSOs, main sources of household revenue, main areas of household expenditure, main livelihood challenges, main health challenges, average daily diet, lean season, sources of energy, sources and cleanliness of drinking water, practice of agriculture and livestock rearing, opportunities for boys and girls, livelihoods opportunities for women, value add and value chain opportunities, existence of savings and loan schemes, changes in fish catches and sea level/weather, changes in firewood and freshwater availability, climate change, and sexual and reproductive health.

#### **Some of the main findings include:**

**Source of Income:** While sources of income varies by community, the most important source of household revenue generally is fishing, including both the sale of family members' fish catches on the market and the purchase of other fishermen's catches for sale on the market. Other activities led by women such as laundry services, charcoal trade, and micro-shops are also sources, though of lesser importance. Additional sources include some livestock (chicken, ducks, pigs) rearing, work as skippers/docker services and transport services by boat.

However, in the last decade fish catches have reportedly declined by up to 80-95%, largely due to competition by trawlers and long liners as well as climate change. As such, livestock is increasingly considered a complement and/or alternative to fishing by all interviewed mainland communities, with a focus on chicken, ducks, goats, and pigs. This is the same for agriculture, with a focus on rice, cassava, maize, pulses, leafy vegetables, tomatoes, onions and sugar cane.

**Main expenses:** The main expense reported across villages is food, mainly rice, cassava and beans. Other commonly reported main expenses include fishing equipment, children’s education, pirogue and fishing net repairs, health expenses, electricity for those who have a house in Maintirano, and soap and commodities.

**Literacy Rate:** The literacy rate in surveyed target communities is extremely low. The highest reported level in one village is 20%, with many villages much lower. However, this is literacy measured by ability to read letters rather than words; as such, the real literacy rate is estimated to be closer to 5%, and even lower in some villages.

**Health, Sexual and Reproductive Health:** AKF’s scoping study in October 2020 revealed extremely poor health among coastal communities despite improved access to health care, and limited access to safe water and sanitation facilities. This poor health continues to undermine community resilience, and communities’ ability to engage in the effective management of marine resources. The scoping study highlighted poor sexual and reproductive health in particular, with anecdotal reports of a high prevalence of STIs, an average age for first pregnancy of 11-15 and a total fertility of 7 live births per woman. Malaria and poor nutrition were also cited as significant health concerns by communities.

**Diet:** The diet generally consists of rice and fish for all meals, with cassava (more rarely maize) as an alternative starchy staple when rice is unavailable. Children also snack on mangoes when in season. The diet is essentially based on starch and fish/seafood, with fresh fruits, pulses and vegetables being very rare.

**Current land use:** All interviewed communities currently depend on forest and mangrove wood and driftwood for their energy (mainly for cooking and smoking purposes), as charcoal is rare or unaffordable. As such, all communities were concerned about the significant reduction in the availability of forest and mangrove wood as well as driftwood. Besides reliance on forest and mangrove wood, land use is minimal as the coastal villages do not currently engage in significant agriculture or livestock rearing despite owning land sometimes kilometres away from the shore and expressing great interest for these alternatives.

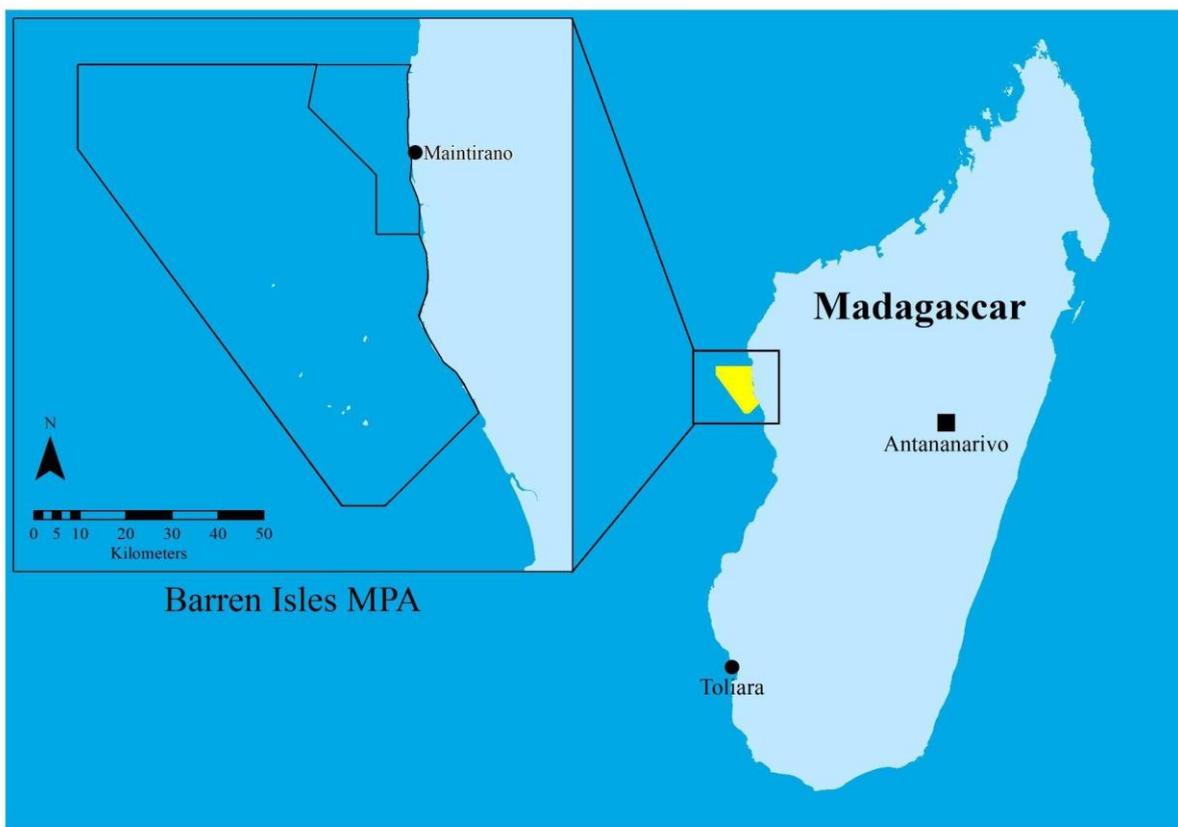


Figure 1 - Location of the project activities

## 2. Stakeholder Identification and Analysis

### 2.1. Stakeholder identification

Different stakeholders have different positions and views on the Project. As such, it is important that all stakeholders are identified as early on in the project design as possible, whilst remaining cognisant not to raise expectations about the potential project benefits. Stakeholder identification and analysis is a tool that helps identify the key actors (or stakeholders), and assess their respective interests, influences, and degree to which they might be impacted.

The first step in the process of stakeholder engagement is stakeholder identification – determining who the project stakeholders are and their key groupings and subgroupings. The objective of stakeholder identification is to establish which organisations, groups, local communities and individuals to be involved:

Table 2 - Stakeholder

| Group of Stakeholders                          | Stakeholders   |
|--|--|
| <p><b>1. Users of land and marine area</b></p> | <p>1.1 Individuals, legal entities, local administration holding land title documents<br/>           1.2 Tenants or occupant without formal rights<br/>           1.3 Land users (grazing, farming or other activities)</p> <p>BV has been working with the local administration and individuals in the project area for over 10 years - our work with them to date has informed this proposal. Our primary beneficiaries are small-scale fishers who use the Barren Isles MPA area. We work closely with these fishers, primarily through the VMNB Association that represents fishers in the area. BV is a co-manager of the MPA area with the VMNB Association and supports VMNB to ensure management decisions are consultative and inclusive.</p>   |
| <p><b>2. Local population</b></p>              | <p>2.1 Inhabitants of the project-affected areas, including Community Based Savings Groups<br/>           2.2 Residents located near the Project location<br/>           2.3 Residents of settlements located near roads used for transporting materials during construction<br/>           2.4 Migrant groups<br/>           2.5 Youth groups<br/>           2.6 Women groups<br/>           2.7 Local community managing mangrove area (VOI)<br/>           2.8 Olders (olobe)</p> <p>As detailed in our proposal, inhabitants and users of the Barren Isles MPA are Vezo-Sakalava, Vezo- Sara and Vezo from the South of Madagascar. BV’s work in the Barren Isles explicitly promotes local leadership and participation in fisheries management, to ensure that the needs, perspectives, interests and food security of coastal communities and other stakeholders affected by the MPA are properly addressed. BV is trying to obtain category VI for the Barren Isles MPA, which aims to conserve ecosystems and habitats together with associated cultural values and traditional natural resource management systems. By empowering communities with legal rights to manage their fisheries, the project will ensure that traditional ecological knowledge will be utilised wherever possible. The MPA’s fisheries management strategy has been developed and managed by local beneficiaries, creating a solution that is led by communities in partnership with state authorities. Although the project aims to reinforce conservation efforts with legal</p> |

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|  | <p>protection, the governance frameworks promoted by the project rest on customary social conventions, and so any restrictions will have both strong local legitimacy as well as national legal standing.</p> <p><b>VMNB Nosy Barren</b> (VMNB), registered as a legal association in 2015 and governed by 45 elected representatives of fishing communities using the Barren Isles MPA, is the co-manager of the protected area with BV and will be assigned specific responsibilities for implementing the MPA management plan through a contract with the Government of Madagascar, along with BV. Building the capacity of VMNB is at the core of BV's strategy for supporting the Barren Islands MPA, and BV will work very closely with VMNB on all aspects of this project, aiming for progressive increased ownership of activities.</p>  |
| <p><b>3. Administrative Bodies and Authorities</b></p>   | <p>3.1. National authorities (concerned ministries)<br/>3.2. Regional authorities (district level government authorities)<br/>3.3. Local authorities</p> <p>BV has been working closely with the <b>Ministry of Environment and Sustainable Development</b> (via regional directorate), the <b>Regional Fisheries and Aquaculture service</b>, and the <b>National Office for the Environment</b> (ONE) to clarify required processes and documents in order to obtain protected status. BV collaborates with the Regional Fisheries and Aquaculture service in the implementation of the Regional Fisheries Plan for the Melaky Region, including the Barren Isles MPA, as well as for monitoring control and surveillance systems in collaboration with the <b>Fisheries Surveillance Center</b>. ONE will assess the submitted MPA documents and undertake annual monitoring visits to the MPA. We will continue our partnership with the government, via the regional directorate, to attain permanent protected status for the Barren Isles.</p> |
| <p><b>4. General public, Non-Governmental Organizations (NGOs) and independent experts</b></p> | <p>4.1 General public<br/>4.2 NGOs<br/>4.3 Experts on a national and international level including IHSM<br/>4.4 Civil society organizations</p> <p>BV and AKF will undertake community awareness raising activities about project activities with the general public in the communities that we work. MIHARI has helped design this project and has 25 NGO members that influence MIHARI's priorities. In addition, BV works closely with a number of NGOs including WWF who is the key NGO that we will be collaborating with on this project beyond our consortium partners. Other NGOs will be engaged through learning exchanges and sharing of lessons learned via WIOMSA and MIHARI. BV will work with WIOMSA and IHSM as experts to support the development of climate change vulnerability indicators and community-based 'low cost' ecological monitoring.</p>   |
| <p><b>5. Media</b></p>   | <p>5.1. Print media<br/>5.2 Radio, TV<br/>5.3. Internet sources</p> <p>Local radio is one of BV's key communication means due to its reach. BV has printed articles in <a href="#">Mongabay</a> and <a href="#">SSIR</a> and a few BV staff members have given TED talks, the most recent <a href="#">TED Talk</a> by our Executive Director, Alasdair Harris, has had over 1.9million views. BV circulates quarterly newsletters to an estimated 10,000 people internationally and BV's facebook page has over 20,000 followers. BV works with a number of INGOs, donors and networks who amplify our messages globally to their members. These include MIHARI, the PHE Network, WIOMSA, Tusk Trust, IUCN, WWF, WCN and Conservation International.</p>  |

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| <p><b>6. Organizations involved in Project implementation</b></p>               | <p>6.1 Construction and design companies involved in implementation of the Project<br/>         6.2 Company staff<br/>         6.3 Contractors and contractors' staff</p> <p>This proposal builds on existing BV work on the ground with local authorities and the VMNB Association. All consortium partners have helped design the project and we have informed WWF of this work, who we will collaborate with during the project.</p>   |
| <p><b>7. Specific vulnerable groups who may be impacted by the Project.</b></p> | <p>7.1 People with difficulty in engaging with the stakeholder consultation process<br/>         7.2 People with special vulnerability due to physical disability, social, political or economic standing, legal status, limited education, lack of employment or housing</p> <p>BV works with local leaders to identify vulnerable people and includes required approaches to ensure they are able to access project activities. The development of the Environmental and Social Safeguarding plan will involve a number of consultations with community members and will ensure vulnerable people are given the opportunity to engage.</p> <p>All small-scale fishers in the project target area will be impacted by the Project and can be deemed vulnerable due to their poverty, poor nutrition, low education levels, and lack of alternative livelihoods. BV and AKF will work closely with these fishers, involving them in the development of the MPA and mangrove management plans and offering support with alternative and improved livelihood opportunities.</p> <p>The Project will include regular monitoring of the impact of management measures on vulnerable people to ensure no one is being left behind.</p> |
| <p><b>8. Private companies</b></p>  | <p>8.1 Association of industrial shrimp farmers and industrial shrimp trawlers (GAPCM)<br/>         8.2 Guanomad<br/>         8.3 Madagascar Oil<br/>         8.4 Collectors</p> <p>The rules governing the temporary MPA were designed in consultation with regional authorities, traditional fishers and industrial fishers - we will continue to engage these stakeholders.</p> <p>As part of the Fisheries Management Plan, Blue Ventures is negotiating with the Group of Aquaculturists and Shrimp Fishermen of Madagascar (GAPCM), in order to define code of conduct for industrial and traditional fishing in the "corridor" of the Barren Isles MPA.</p> <p>We had meetings with Guanomad and Madagascar oil led by civil society to share projects and identify interests. BV stays in touch with them and ministries to know the project progress.</p> <p>BV supports VMNB to find new market opportunities. We contacted collectors and promoted price negotiation between VMNB and collectors. This approach empowers the local communities and increases the value of octopus and fish.</p>  |

## 2.2. Stakeholder analysis

After identification follows a stakeholder analysis which provides a more in depth look at the identified stakeholder groups. Identified stakeholder groups/ stakeholders are analysed using different criteria, and the results of this exercise then inform the type of stakeholder engagement and the basis for the stakeholder engagement strategy.

- The potential of the project to impact the stakeholder (positively or negatively)
- Stakeholders interest (stake) in the project.
- Stakeholder's potential to influence the Project and other stakeholders

The categories of engagement type for this project may include:

- **Informed Consultation and Participation (ICP)**, if there are potentially significant adverse impacts on the stakeholder in question;

- **Consultation**, also referred to as ‘meaningful consultation’ if the level of impact and type of engagement is not yet clear and needs to be understood, or in cases where the potential impacts are not significant, but the stakeholders are affected nonetheless; and
- **Information sharing**, for all other stakeholders where there is no identified potential impact; information should be shared with stakeholders.

The approach which was used in developing the stakeholder’s engagement plan and the conflict management and complaints mechanism went through several stages:

- Consultation of previous documents and legal texts;
- Consultation of the Ministries’ websites;
- Stakeholders’ Interview;
- Stakeholders’ preparation;
- Validation of the stakeholders’ engagement plan and the conflict management and grievance mechanism at the regional partners’ meeting

### **2.2.1. Consultation of the first version of ESMP and legal texts**

As a reminder, a draft version of the ESMP was developed by Blue Ventures in 2019 (see Barren Islands Marine Protected Area, Environmental and Social Safeguard Management Plan, Blue Ventures Conservation, January 2019). In this ESMP, a section in the chapter "Project monitoring and evaluation program" has been dedicated to the charter of responsibility for monitoring the social safeguard plan, and another chapter deals with the conflict prevention and resolution mechanism.

In addition, legal texts, notably on the roles and attributions of the Ministries and their respective Regional Directorates as well as the roles and attributions of the local authorities – were consulted. The concern is to avoid that activities which are in the domain of the regalian functions of the State, thus of the various ministries – are carried out by the other stakeholders. On the other hand, it seems judicious to remind the deconcentrated services of the State and the local authorities of the roles devolved to them by the texts.

In view of this, account was taken of what was stated in the first ESMP version, both on the charter of responsibilities and on the conflict prevention and resolution mechanism. On the other hand, in order to prevent any interference in the regalian functions of the State by another stakeholder, which could not only lead to a conflict but above all to the cancellation of the act, it was necessary to distinguish the interventions that could be carried out by the stakeholders from those reserved for the State services and/or the local authorities.

### **2.2.2. Consultation of the websites**

A consultation of the websites of each concerned Ministry was also carried out. The concern is to try to fill, as far as possible, the gaps in the legal texts with regard to the roles and responsibilities of each Ministry and/or local authority. Indeed, in practice, it is possible that activities which are not specified and/or not provided for in the legal texts are carried out by the State’s technical services or by the local authorities. Moreover, in Madagascar, over the last few decades, the names and functions of Ministries have changed with the regime in place.

### **2.2.3. Stakeholders’ interview**

With reference to the collected elements above, an interview was carried out with each technical service of the State and with each local authority, in particular those which are stakeholders of the project. In the majority of cases, these entities asked that the project either makes a proposal with reference to the roles and attributions provided for by the texts, or they asked for a period of time to determine the activities that they are likely to provide.

On the other hand, for the other entities such as the VMNB Association and VOI, they referred to the activities reserved for them by COAP, as a CoGe of the MPA, to the activities which are already provided for in the first version of the ESMP above, and to the activities provided for in their respective statutes and internal regulations.

Particularly for the conflict management and complaint management mechanism, the stakeholders proposed that the practices and organizations that prevail in the area should simply be formalized for consistent and effective actions. In fact, these practices and organizations have been recognized and legitimized by the communities for a long time, and changing them would lead to trial and error in the organizations that may be put in place, and the communities may not take ownership of these new organizations.

### **2.2.4. Validation of the stakeholders’ engagement plan and the conflict management and complaint resolution mechanism at the regional partners’ meeting**

As the timeframe for field interventions was limited, it was agreed with Blue Ventures that the proposed stakeholders' engagement plan and conflict and grievance management mechanism would be submitted for stakeholders' validation at the next regional partners' meeting.

This charter of responsibilities or stakeholders' engagement sets out and determines the roles and responsibilities of each of the stakeholders in the institutional organization and implementation of the ESMP. However, in order to ensure as much as possible a better management of the MPA and to prevent any risk of misunderstanding, prevarication or overlapping of interventions between stakeholders that could compromise the achievement of results, this charter also recalls some roles and attributions of stakeholders in the MPA management. These roles and attributions have been drawn from the provisions of legal texts such as the COAP Law, the Law on the Fishing and Aquaculture Code, the Organic Law governing territorial communities, the Law on the Tourism Code, the COAP Decree, the Ministerial Decree on the concerted management plan for marine fisheries in the Melaky Region, and from interviews with some of the concerned stakeholders.

The present charter is neither exhaustive nor restrictive, it is evolving and can be adjusted and updated, on the initiative of the supervisory Ministry and/or the MPA managers, according to the evolution of the State policy, possible changes and/or modifications made to the organization of the ministerial Departments as well as to the evolution of the realities of the future MPA.

### **3. Stakeholder engagement**

This SEP sets out and determines the roles and responsibilities of each of the stakeholders in the institutional organization and implementation of the ESMP. However, in order to ensure as much as possible a better management of the MPA and to prevent any risk of misunderstanding, prevarication or overlapping of interventions between stakeholders that could compromise the achievement of results, this SEP also recalls some roles and attributions of stakeholders in the MPA management. These roles and attributions have been drawn from the provisions of legal texts such as the COAP Law, the Law on the Fishing and Aquaculture Code, the Organic Law governing territorial communities, the Law on the Tourism Code, the COAP Decree, the Ministerial Decree on the concerted management plan for marine fisheries in the Melaky Region, and from interviews with some of the concerned stakeholders.

The present plan is neither exhaustive nor restrictive, it is evolving and can be adjusted and updated, on the initiative of the supervisory Ministry and/or the MPA managers, according to the evolution of the State policy, possible changes and/or modifications made to the organization of the ministerial Departments as well as to the evolution of the realities of the future MPA.

All small-scale fishers in the project target area will be impacted by the Project and can be deemed vulnerable due to their poverty, poor nutrition, low education levels, and lack of alternative livelihoods. BV and AKF will work closely with these fishers, involving them in the development of the MPA and mangrove management plans and offering support with alternative and improved livelihood opportunities.

The Project will include regular monitoring of the impact of management measures on vulnerable people to ensure no one is being left behind. This project will reach the following specific vulnerable groups:

- Female-headed households
- Persons with disabilities
- Children
- Adolescent girls
- Impoverished households
- Marginalised ethnic groups (Vezo peoples)

Special consideration will be taken to ensure these groups are duly and timely consulted and that their concerns are taken into account, they have a role to play in design and implementation of activities, and activities are delivered in an appropriate and accessible manner. Specifically, AKF will work through Community Based Savings Groups (CBSGs) as an entry point into the communities. CBSGs are in general formed mainly by women, providing a platform for consultation, women's decision making and messaging as it increases control over resources. Through training provided to these groups, AKF will build a facility for savings and loans as well as capacity in financial literacy and management. The groups will also serve as a platform to address nutrition and some specific health issues, such as sexual and reproductive health as well as contraception. These sessions will be designed to meet the needs of female-headed households, children, and adolescent girls.

Participatory targeting of beneficiaries will be done with communities, including traditional leadership, to ensure the poorest households and persons with disabilities are included and their specific needs incorporated. The scoping study conducted and consulted communities on what livelihood opportunities could be pursued for women

and youth in the communities, providing direction that will be further narrowed in close participation with communities.

The Vezo people who make up the largest portion of the target population struggle with a lack of political representation and investment from the government. There is a pervasive sense of unfairness and neglect due to this. AKF will work in close collaboration with these communities to participatively develop livelihood solutions that are acceptable culturally and work for both men and women in the community. All project communications will be made accessible in local languages.

### 3.1. Stakeholder engagement already undertaken

This section describes all of the stakeholder engagement activities that have taken place prior to project implementation.

*Table 3 - Stakeholder engagement*

| Activity                       | Target Stakeholder  | Description  | Timing               |
|--------------------------------|---|--|----------------------|
| Livelihoods Scoping Study      | Target villages / community members   | <p>Focus groups were held with select target stakeholder groups in villages in the Barren Islands region. The following focus groups were held:</p> <ul style="list-style-type: none"> <li>- 25<sup>th</sup> October, with women in Ambalahonko-Namela village</li> <li>- 25<sup>th</sup> October, with men in Ambalahonko-Namela village</li> <li>- 26<sup>th</sup> October, with men and women in Andabohy village</li> <li>- 27<sup>th</sup> October, with men and women in Soahany Andriake village</li> <li>- 28<sup>th</sup> October, with leadership of Fishermen Association VMNB in Nosy Barren</li> </ul> <p>The topics covered were: taboos in the community, existing public/community infrastructure, existing CSOs, main sources of household revenue, main areas of household expenditure, main livelihood challenges, main health challenges, average daily diet, lean season, sources of energy, sources and cleanliness of drinking water, practice of agriculture and livestock rearing, opportunities for boys and girls, livelihoods opportunities for women, value add and value chain opportunities, existence of savings and loan schemes, changes in fish catches and sea level/weather, changes in firewood and freshwater availability, climate change, and sexual and reproductive health.</p> | 23 – 30 October 2020 |
| Meetings, forums and workshops | Key Government departments at national level:<br>- General directorate of Fisheries and Aquaculture | BV builds relationships with a number of government representatives from all relevant ministries (fisheries, environment, tourism, and transport) at national and regional level in order to ensure that our work aligns with and  | Ongoing              |

|   |   |  |              |
|---|---|--|--------------|
|   | <ul style="list-style-type: none"> <li>- Ministry of Environment and Sustainable Development</li> <li>- Ministry of Public Health</li> <li>- Ministry for Water</li> <li>- Fisheries Surveillance Center</li> </ul>   | <p>contributes to national and regional policies, priorities and strategies.</p> <p>BV will work closely with the fisheries and environment ministries to progress through the requirements to obtain MPA status.</p> <p>MIHARI invites government representatives to all of its forums and other relevant meetings to share progress, identify areas for collaboration and support, and address barriers to our work.</p>   |              |
| Meetings, forums and workshops                        | <p>Key Government departments at regional level:</p> <ul style="list-style-type: none"> <li>- Regional Fisheries and Aquaculture service</li> <li>- Directorate of Environment and Sustainable Development</li> <li>- Regional directorate of Public Health</li> <li>- Fisheries Surveillance Center</li> </ul> | Same as above.   | Ongoing      |
| Meetings  | Small-scale fishers in Melaky, regional authorities, industrial fishers.  | BV has already successfully worked with local communities to achieve the shared vision of rebuilding fisheries for sustainable traditional livelihoods throughout the Barren Isles MPA. The rules governing the temporary MPA were designed in consultation with regional authorities, traditional fishers and industrial fishers - we will continue to engage these stakeholders. Beyond this, BV has been working with fishing communities and Madagascar's fisheries ministry to develop a regional fisheries management plan for the entire Melaky Region, which has been approved and is now being implemented. | 2014 - 2019  |
| Regular meetings, planning of project activities etc. | VMNB Association, representing small-scale fishers in Maintirano  | VMNB is the co-managing body (with BV) of the Barren Isles MPA. We work together to identify needs, plan activities, implement activities etc. BV supports and trains VMNB to take an ever greater role in managing the fisheries management plan and the draft MPA plan.<br>BV and ministries are supporting VMNB to develop a five year plan for MPA management plan (PAG).  | October 2021 |

|  |   |  |   |
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| Collection of socio-economic data on project participants to identify priority needs, vulnerable groups and ensure inclusion of women. | Communities living in the MPA area and buffer zone  | <p>BV has started collecting socio-economic data in all communities included in this project that has helped identify priority needs included in this proposal. The census is ongoing and will finish by this 2021 (COVID-19 allowing).</p> <p>AKF will undertake a feasibility study in October-November 2020 to determine the most appropriate livelihood activities to include - they will select a number of communities to hold focus group discussions with, including larger and smaller villages, those on the islands, and those living in the buffer zone. AKF will ensure women and vulnerable people are given an opportunity to engage in the consultation process. In addition, BV will work with AKF to collect missing baseline figures.</p> | 2019 with updated information in 2021             |
| Value chain feasibility study  | Communities in the MPA and buffer zone, market traders, collectors in the whole Melaky region | A detailed value-chain feasibility study was done in the Melaky region in 2015. Findings have helped inform proposal activities and a feasibility study done by AKF at the start of the project will explore recommendations in more depth.  | 2015  |
| Environmental Impact Assessment and Social safeguarding plan   | Communities that will be affected by the MPA and the surrounding area                         | BV commissioned a consultant and firm to undertake an environmental impact and social safeguarding assessment to inform the MPA management plan and social safeguarding plan. This entailed several consultations with communities leaving in and near the MPA to assess risks and the potential positive and negative impact that the MPA might have on their lives.  | 2012, with updated consultations in 2019 and 2021 |
| Fisheries management measures  | Local community members   | A series of workshops were organized to identify and validate the fisheries management measures for each settlement in the Barren Isles.   | 2016  |
| Implementation of the Fisheries management plan  | Local community, Ministries (at national and regional levels), local authorities              | The Fisheries management plan was elaborated and validated. Two kick-off workshops were organized at national and local levels.  | 2016 and 2017                                     |
| Public consultation for the elaboration of the local convention (Dina)   | Local community, local representatives of fisheries and environment ministries                | The above management measures identified in a participatory way were used to draft the Dina and the related sanctions. It was subsequently approved by the regional Court. This is the main document that the community-based surveillance agents  | 2017  |

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|  |  | use for their surveillance patrol activities. |  |
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### 3.2. Planned stakeholder engagement and disclosure during project implementation

This section describes how stakeholder groups will be further engaged throughout project implementation in order to ensure that their views and concerns are heard and taken into account, foster constructive work relationships as well as more generally sharing of information and facilitating understanding.

*Table 4 - Planned stakeholder engagement*

| <b>Activity</b>  | <b>Target Stakeholder</b>   | <b>Description</b>  | <b>Timing</b>   |
|--|---|---|---|
| Pre-baseline survey                                    | Communities, households, men, women, youth, local CSOs            | Identification of the main sources of income, expenditures, livelihood/health/water/energy challenges, socioeconomic opportunities, energy solutions to provide final orientation to the project strategy and define the key indicators | October 2020 (completed)                              |
| Informed, consultation and participation (ICP) Meeting | Community stakeholders (men, women, association members, leaders) | Presentation of the project, strategy, approach, opportunities allowing communities to select the priority socioeconomic activities adapted to their context and aspirations  | First two weeks of the project                        |
| Baseline survey  | Communities, households, men, women, youth, local CSOs            | Data collection of qualitative and quantitative indicator levels among a representative sample of communities and beneficiaries to provide the pre-project situational snapshot and data for the project GIS                            | First month of the project following the ICP meetings |
| Kick-off meetings                                      | Community stakeholders (men, women, association members, leaders) | Project kick-off meetings in target communities to define the calendars and annual objectives and priorities, roles and communication modalities  | Inception phase of project implementation             |
| Mid-term survey and evaluation                         | Communities, households, men, women, youth, local CSOs            | Participative evaluation of project achievements, challenges, issues and orientation  | Mid-term  |
| Final survey and evaluation                            | Communities, households, men, women, youth, local CSOs            | Participative evaluation of final achievements, lessons learned, orientations and upscaling   | End of project  |

|  |  |   |                            |
|--|--|---|----------------------------|
| Maintain or develop current partnerships to improve health service delivery and continue collaboration with PSI (organisation responsible for medical supply chain in target region) | Health Ministry, CSB, PSI, CHWs, Mother's and Youth Group's, Communities,  | Continue MoU with PSI Madagascar and collaborate to provide family planning services.(ensure the continuation of the medical supply chain for each community clinic (Toby)  | Ongoing                    |
| Collaborate with existing government health programmes   | ACCESS, CSB, CHWs  | Continue to partner with Mahefa Miaraka and ACCESS for health service delivery in Melaky through meetings to ensure collaboration and aligned objectives  | Ongoing                    |
| Strengthen links between CHWs and the public health system   | Health Ministry, ACCESS, CSB,  | Conduct training of trainers (FDF) for pools trainers of government at the regional, district level Management Team of the Region (EMAR) and the District Management Team (EMAD)) and CSB for them to conduct the training and recycling of CHWs (Including staff Safidy to the all training session organised by ACCESS and MoH) | June 2021                  |
| Collaboration on health campaigns  | Health Ministry, CSB (Centre de Santé de Base (Clinic Health Center)), CHWs, AGA KHAN  | Conduct health campaigns together, such as vaccination campaigns or mosquito net campaigns (Contributing the all of vaccination campaign through MoH such as SSME-Polio,praziquantel)   | Routine activity           |
| Consultations to feed into the Social safeguarding plan (PGESS) and Climate Change Vulnerability assessment  | Communities living in the target area, local authorities, VMNB Association, Local authorities.   | Hold consultations with project communities, local authorities and VMNB Association to update the social safeguarding plan and undertake a climate change vulnerability assessment that will feed into the MPA Management Plan (PAG)  | April - September 2021     |
| Environmental Impact Assessment  | Communities living in target area, local authorities, VMNB Association   | Hold consultations with project communities, local authorities and VMNB Association to assess the potential environmental impact of the MPA on target communities   | April - September 2021     |
| Public consultation for the BI MPA management plan (PAG) validation at local level (District/Region).  | All stakeholders involved in the local land planning.<br><br>Stakeholders impacted positively or negatively by the implementation of the MPA plan. | These sessions of workshop and public consultations aimed to determine the final management plan to be implemented within the BI MPA. The Final limitation of the MPA should be validated and social and environmental measures set up. Integrate final recommendations   | September - December 2021. |

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|  |   | related to the PAG implementation at the regional level.  |                  |
| Organize a workshop with the Madagascar's Protected Area System (SAPM) to present and validate the PAG | Ministry of environment, Ministry of fisheries, Ministry of mine and strategic resources, Other CSOs  | Present the PAG with concerned stakeholders.<br>Integrate final recommendations at the national level related to the PAG implementation   | Dec 2021.        |
| Accelerating VMNB Association consent to participation in fisheries management                         | Régional authorities, SRPA, VMNB association  | Collaboration with the region so that the governor of the region issues an official letter so that the VMNB association can participate in the management of the fishery  | Ongoing          |
| Reinforcement of Dina in the Barren Isles  | Tribunal, préfecture, commune, chef fokontany<br>Community stakeholders: dina committee, Akio Kary (patrol officers), fishermen   | Document update, public consultation, awareness, public validation, capacity building for the dina committee in order to fully respect the dina application process   | Ongoing          |
| Meeting between Patrol officers (Akio Kary) and government authorities                                 | Akio Kary, Community members, Department of the Ministry of Fisheries (CSP), regional ministry of environment and sustainable development and regional ministry of agriculture, livestock and fisheries, chef fokontany                                     | Akio Kary shares data on infractions with regional ministries, the dina committee and BV.   | Ongoing          |
| Develop an action plan development for the implementation of the identified alternative livelihoods    | VMNB, Aga Khan, SRPA (Service Régional pour la Pêche et Aquaculture(Régional service for fisheries and Aquacultures), DREDD (Direction Régional de l'Environnement et Développement Durable(Régional Direction of Environment and Sustainable Development)) | Elaborate an action plan to implement the identified alternative livelihoods  | Feb 2022         |
| Data feedback to communities   | VMNB, data collectors   | Conduct feed-back to local communities on fisheries data, ecological dive monitoring data, seagrass monitoring data, and turtle nesting monitoring data in all BI villages and discuss implications to inform adaptive management | Routine activity |

|   |  |   |                |
|---|--|---|----------------|
| Conduct information and awareness campaigns in the different target villages on the adopted co-management system. | VMNB, SWIOFish2  | Conduct community information and awareness meetings as part of the information and awareness campaign on the co-management system  | December 2021  |
| Facilitate participatory, inclusive and transparent decision-making processes to manage local fisheries           | VMNB, SWIOFish2, Service Regional de la Pêche et de l'Aquaculture (SRPA), DREDD, Fokontany | Facilitate participatory, inclusive and transparent decision-making processes at community level, by facilitating the participation of co-management associations in public consultation processes in LMMAs, strengthen / encourage the participation of community leaders of co-management structures in meetings with stakeholders. | September 2022 |

### 3.3. Informed Consultation and Participation

#### 3.3.1. Background to ICP

For projects with potentially significant adverse impacts on Project Affected People, an Informed Consultation and Participation (ICP) process is appropriate. ICP involves an in-depth exchange of views and information, and an organised and iterative consultation, leading to the incorporating of the views of the Project Affected People into the decision-making process on matters that affect them directly, such as management measures (measures to avoid, minimise or compensate for identified impacts), sharing of development benefits and opportunities, and implementation issues.

The consultation process:

- Captures all stakeholder's views (including both men's and women's), if necessary, through separate forums or engagements, and
- Reflects men's and women's different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate.

#### 3.3.2. Project ICP Process and groups

The stakeholders potentially significantly affected by the Project, requiring ICP, are listed below:

For projects with potentially significant adverse impacts on Project Affected People, an Informed Consultation and Participation (ICP) process is appropriate. ICP involves an in-depth exchange of views and information, and an organised and iterative consultation, leading to the incorporating of the views of the Project Affected People into the decision-making process on matters that affect them directly, such as management measures (measures to avoid, minimise or compensate for identified impacts), sharing of development benefits and opportunities, and implementation issues.

The consultation process :

- Capture all stakeholder's views (including both men's and women's), through separate meeting, and
- Reflect men's and women's different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate.

##### *a. MEDD as the supervisory Ministry*

As defined by the COAP, the MEDD's responsibilities include:

- The implementation of the State policy in terms of regulation, promotion, creation, management and control of SAPM Protected Areas;
- The judicial prosecution of contraventions, misdemeanors and crimes committed within the MPA as well as those which are committed in its protective and/or peripheral zones;
- The confiscation of animals and plants produced by the offence initiated inside and outside a Protected Area;
- The sale or impoundment of confiscated equipment used for any prohibited activities;
- Notification and transmission of technical, legal and geographical information and data to the ministerial departments concerned by the MPA, that have acquired temporary or definitive protection status according to their respective categories in accordance with the COAP provisions;
- Securing land tenure in any Protected Area other than the private Protected Area, with the support of the operational co-managers of the MPA;
- Encouragement or approval of initiatives to change the boundaries or MPA status;
- Coordination of the contribution of other ministerial departments and the participation of deconcentrated services and local authorities at all stages of the procedure for the creation, change of boundaries or status of the MPA;
- Together with the co-managers, the general coordination of the SAPM on the procedure of creation and management of a Protected Area, the review and approval of the MPA's PAG, the coordination and facilitation of all activities or operations related to the MPA as well as the technical control and technical support to its management;
- Together with the advisory body and the council of experts, the approval or refusal of the proposal of areas of similar or restored extent representative of the same ecosystem and level of biological diversity as the areas of interest for extraction identified by the operators in the extractive sectors according to the provisions of Article 40 of the COAP;
- The granting of authorizations for scientific research within the MPA after a favorable opinion from the CoGe
- In an emergency situation, the proposal to the Government Council of the project of granting authorizations for certain activities or prohibited removals in the MPA;
- Financial sustainability for the MPA's sustainable management, in conjunction with the CoGe;
- Approval of agreements of a commercial nature, as well as those concerning tourist or other activities that are concluded between the CoGe and any natural or legal person;
- The conclusion of contracts of an international nature or of great importance;
- In conjunction with the operational manager, the setting of MPA entry fees;
- The determination of research rights, shooting rights and filming rights;
- Together with the photographer, filmmaker or researcher, the fixing of intellectual property rights;
- The collection of research rights, intellectual property rights, filming rights;
- The setting of distribution rates and the determination of the lines of use of research rights, intellectual property rights, filming and photography rights collected;
- In conjunction with the CoGe, the setting of allocation rates and the determination of lines for the use of the entrance fees collected at the MPA level;
- The granting of authorization after the agreement of the CoGe, for any clearing without or followed by incineration, any removal or alteration of animals, plants or monuments, landscapes, any felling of woody products, any introduction of plants or animals, any transport or sale of plants, wild animals, or main or accessory forest products, fishery products and corals coming from within the MPA;
- The issuance of assent for any construction, any extractive activity, any electricity production activity, any removal of non-timber forest products, any fishing or hunting activity, any underwater hunting, any water catchment, any grazing and other agricultural or similar activities within the MPA;
- The issuance of an assent for any overflight of the MPA at an altitude of less than one thousand meters;
- The judicial prosecution of contraventions, misdemeanors and crimes committed within the MPA as well as those committed in its protection and/or peripheral zones;
- Confiscation of animals and plants produced by the offence initiated inside and outside the MPA;
- The sale or impoundment of confiscated equipment used for any prohibited activities.

***b. The regional fisheries and fisheries resources service /CSP***

Its responsibility is to:

- Disseminate and spread the regulatory texts on fisheries;
- To issue and renew, every 5 years, the professional card of fisherman and apprentice fisherman;
- Maintain the local register of professional fishermen's cards;
- To issue and renew, annually, the cards of fishmongers;

- To ensure the respect of the ban on artisanal and industrial fishing activities carried out on board boats or ships based outside the Melaky Region and using fishing techniques other than trawling;
- Take measures to prevent overexploitation so that fishing effort is commensurate with the productive capacity of the fishery resources and their sustainable use;
- Encourage the conduct of applied scientific research and data collection to improve scientific and technical knowledge of fisheries and their interactions with the ecosystem;
- Apply the precautionary and ecosystem approaches to the conservation, management and exploitation of fishery resources;
- Require the use of selective fishing gear that respects the aquatic environment, in order to preserve the integrity of the species associated with the harvested species;
- Protect critical habitats in marine, brackish and freshwater ecosystems, such as wetlands, mangroves, reefs, lagoons, breeding grounds and spawning grounds;
- Ensure that multiple uses of the coastal and lake area do not have negative impacts on the preservation of fisheries resources;
- Ensure that any activity likely to affect the interests of the conservation, management and sustainable use of fisheries resources is subject to an environmental impact assessment;
- Protect the interests of subsistence, small-scale and artisanal fisheries;
- Apply measures for the preservation and management of fisheries resources through the implementation of a system for monitoring, controlling and surveillance of fishing activities in Malagasy waters.
- Take the necessary measures to combat illegal fishing;
- Particularly for the shrimp fishery, its responsibility is to:
  - Inform fishermen of gear marking procedures;
  - Maintain a register of inventoried and marked shrimp fishing gear used by the small-scale fishery in the region;
  - Check the markings on gear used by small-scale fisheries ;
  - Receive, verify and transmit information on the loss of marks to the central level.

#### ***c. Ministry of Fisheries and Blue Economy (MPEB)***

The MPEB, in accordance with Decree No. 2020-158 setting out its attributions, is responsible for designing, implementing and coordinating the General State Policy (GSP) in the field of fisheries, aquaculture and the blue economy. In this, its missions consist in ensuring:

- Food and nutritional security in the context of climate change;
- The emergence of a modern and sustainable fisheries sector by adopting a strategy based on a policy of food self-sufficiency, modernization and promotion of agribusiness and a policy of sustainable and rational exploitation of renewable natural resources.
- As part of the implementation of the fisheries management plan, the ministry provides:
- the research and analysis of necessary information for fisheries management and wide dissemination of results;
- The issue and renewal of industrial and small-scale fishing licences and authorizations, in accordance with the provisions of the Plan, particularly for shrimp trawling;
- The setting of fees for industrial fishing activities;
- The collection and processing of statistical and economic data on industrial fishing and the dissemination of the results; and
- Unannounced monitoring and surveillance of fisheries or ad hoc support missions on request.

#### ***d. Ministry of Tourism***

While waiting for a possible opening of a Regional Directorate, the Ministry of Tourism ensures:

- The preparation and application of legislation and regulations relating to tourism and hotel professions and activities;
- The management of tourism, its promotion, its development and its diversification;
- The promotion of the tourism industry.

#### ***e. Regional Public Health Directorate (DRSP)***

Its responsibility is to:

- Coordinate the activities of District Public Health Services

- Draw up the Regional Health Organization Plan
- Support the implementation of health activities in the health district
- Develop partnership and intersectoral collaboration for health development at the district level
- Develop norms and standards for quality of services

***f. Gendarmerie***

- It is responsible for administrative, judicial and military police missions;
- It participates in the security of numerous sites and sensitive points.

***g. Melaky Region***

The Melaky Region, and particularly the governor, is the responsible who:

- Facilitates the administrative procedures for the creation and management of the MPA at the regional level;
- Ensures the development of its community. To this end, he/she initiates, stimulates, coordinates and harmonizes the economic and social development of the Region, including the economic and social development in connection with the MPA, with the assistance of the relevant decentralized State services.
- Negotiates, in the name and on behalf of the Communes of his/her jurisdiction, cooperation and partnership agreements with national or foreign organizations or authorities, after having been duly mandated by the respective deliberative bodies of the said Communes. In this regard, the Head of the Region signs the convention jointly with the Mayors of the concerned Communes;
- Monitors the management of the MPA.

***h. The Communes of Maintirano, Betanatanana and Soahany***

The Communes which are attached to the MPA, and particularly the Mayors – are the responsible which:

- Facilitate the administrative procedures related to the creation and management of the MPA at the Commune level;
- Find and mobilize the necessary means to promote economic, tourist, social and cultural development in its locality with a view to preserving the environment;
- Ensure police power in matters of land use management, housing and construction, in accordance with the communal development plan or the approved urban plan.
- Coordinate the implementation of activities relating to decentralized land management in his or her locality. In this regard, he/she creates an administrative service called "land desk" after deliberation by the Council.
- Ensure the implementation of the procedure for the recognition of occupancy rights, known as the land certification procedure.
- Identify, together with the communities, the lands under untitled property rights and the areas under community management.
- Manage local development areas dedicated to local uses and needs for the extension of family farming, the extension of housing, the town, reforestation and small-scale investments, in accordance with the regulations for the management of land included in areas subject to specific legal regimes.
- Contribute to the preservation, enhancement and management of the environment and natural resources;
- Contribute to the prevention and control of bushfires and deforestation;
- Monitor the implementation of the PSSE;
- Participate in the management of conflicts related to the management of the MPA or the implementation of the ESMP.

***i. The Fokontany where the project is taking place***

The Fokontany Chiefs are the administrative authorities of the basic districts, they ensure:

- The maintenance of the population register of their respective constituencies;
- Conflict management at the level of their respective Fokontany;
- Support to the Mayors in monitoring the implementation of the PSSE.

***j. Blue Ventures NGO***

En tant que promoteur de la future AMP, il est chargé :

- Engage in the process of creating the MPA, to coordinate and lead the implementation of the process, in conjunction with the MEDD and other ministerial departments;
- Ensure that all activities related to all stages of the MPA creation process are respected and carried out;
- Mobilize the necessary means for the implementation of the process of creation and implementation of the ESMP including the PSSE;
- Ensure that the MPA project being created is taken into account in the reference frameworks and/or working tools (PUDi, PRD, SRD, etc.) of the MPA's parent communities.

#### ***k. The MPA co-managers***

In their management role, the responsibility of the co-managers, among other things, is to:

- Ensure the systematic adoption of procedures for consultation and dialogue with the various stakeholders concerning the management and modification of the status and/or boundaries of the MPA;
- Submit the possible proposal for a change of status to the Ministry in charge of Protected Areas;
- Initiate the change of status process;
- Ensure that the boundaries of the MPA are marked;
- In an emergency situation, establish the technical documents for the granting of authorizations for certain activities or samples prohibited in the MPA;
- Conclude agreements of a commercial nature and those concerning tourist or other activities, excluding contracts of an international nature or of great importance, with any natural or legal person after approval by the MEDD;
- Negotiate with operators and particularly the travel industry to include Nosy Barren MPA in the tourist circuit of the Region;
- Collect MPA entry fees;
- Implement surveillance, monitoring and alert activities on events occurring in the protection zones and refer to the competent authorities in the event of an alert or events that could jeopardize the safety of the MPA, the people present and the resources, or any other major risk situation;
- Issue their opinion, with a view to the granting of authorization by the MEDD, for any clearing without or followed by incineration, any removal or alteration of animals, plants, monuments or any other object, any removal of non-wood forest products, any felling of wood forest products, any introduction of plants or animals, any fishing or hunting activity, any underwater hunting, any overflight at an altitude of less than one thousand meters, any grazing and other agricultural or similar activities, any transport or sale of plants, wild animals, or main or accessory forest products, fishery products and corals, any shooting or filming within the Protected Area;
- Jointly with the MEDD, issue the assent (in view of granting authorization by the concerned Ministry) for any electricity production activity and any water catchment;
- Establish an agreement with the owners for all domestic animals within the MPA;
- Jointly with the MEDD, issue their opinion for any destruction or deterioration of infrastructures within the MPA;
- Granting of authorization for any feeding of animals, camping, bivouacking and caravanning, scuba diving, penetration into the MPA;
- Support the MEDD and the State services for the registration of the development prescriptions on the land ownership documents;

In accordance with the governance principles of the Madagascar Protected Areas System, MPA CoGe's also have the duty to:

- Ensure transparency and accountability to various stakeholders and the public;
- Respect the principle of accountability;
- Respect the principle of equitable benefit sharing.

#### ***l. The Vezo Miray Iles Barren Association***

As a partner and stakeholder in the MPA, its responsibility is to:

- Sensitize the people who are involved in small-scale fishing within the Melaky Region in general and within the MPA in particular, to join the VMNB Association or another authorized fishermen's association to participate in the management of fisheries in the Melaky Region;
- Make small-scale fishermen aware of the need to apply for a professional fisherman's card allowing them to carry out fishing activities at the competent technical service of the State. The type of professional card is the one that allows the fisherman to access the MPA;

- Identify and maintain an updated register of village fishermen who fish in the MPA;
- Propose to the competent authorities the maximum number of fishermen who can exercise their activity in the MPA as well as the fishing gear they can use, based on the recommendations of a specific study validated by the Ministry in charge of fisheries;
- Ensure that a fisherman who does not reside permanently in a locality concerned by the MPA and who does not return there for two years in a row is replaced by another fisherman from another locality within or outside the Melaky Region. Priority is however given to fishermen residing in a locality concerned by the MPA;
- Ensure community-based monitoring of the MPA;
- Participate in the general organization of the exploitation of the MPA's fishery resources;
- Participate in the implementation of practical measures to ensure compliance with the regulations in force;
- Participate in the establishment and operationalization of local fisheries control and surveillance committees under the coordination and supervision of the Fisheries Surveillance Centre;
- Propose a modification or adaptation of the regulations in relation to the local context of exploitation of fishery resources;
- Participate in the practical management of the allocation of access rights to the resource, including the final decision on the allocation, the provisional suspension of use and the final withdrawal of the fishing license;
- Participate in the development of the MPA's GAP;
- Manage conflicts between fishers operating in the MPA and/or between PSSE beneficiaries on MPA-related matters

Within the framework of the implementation of the Fisheries Management Plan of the Melaky Region, the allocations of the local communities are summarized below:

- General organization of the exploitation of fishery resources in the protected area within the framework of the conditions set out in the said Plan;
- Establishment of practical measures to ensure compliance with the regulations in force ;
- Proposal to modify or adapt the regulations to the local context of exploitation of fishery resources;
- Practical management of the allocation of access rights to the resource (decisive opinion on the allocation, provisional suspension of use and definitive withdrawal of fishermen's cards);
- Granting and recognition of the status of professional fisherman to a member of the village community, by accepting his membership and maintaining him in the association entitled to participate in the management of fisheries;
- Delimitation of areas prohibited from exploitation, other than those established as such by regulation ;
- Delineation and organization of the operation of strictly limited use areas; and
- Collection of catch and effort data for small-scale fisheries.

#### *m. The "Olobe"*

Traditional authorities at the local community level – ensure:

- The preservation of traditions, habits and customs;
- The transmission of these traditions, habits and customs;
- Conflict management within their communities.

#### *n. VOI*

As a partner and stakeholder in the MPA, its responsibility is to:

- Sensitize the communities on the implementation of AMGL and/or TGRN around the MPA, with the objective of ensuring rational and sustainable management of natural resources around the MPA;
- Educate its members to participate in ecological restoration in and around the MPA;
- Participate in the establishment and operationalization of local fisheries control and surveillance committees under the coordination and supervision of the Fisheries Monitoring Centre;
- Propose a modification or adaptation of the regulations in relation to the local context of exploitation of fishery resources;
- Participate in the establishment of practical measures to ensure compliance with the regulations in force outside the MPA boundaries.
- Promote environmental education.
- Valorize traditional and local systems (institutions, know-how and knowledge) for the sustainable use and management of the concerned natural resources.

## 4. Grievance Mechanism

### 4.1. Introduction

The natural resources of the Barren Islands have long been the targets of various local operators as well as those from other regions, both individuals and industrial companies. It is in this sense that this mechanism, which is recommended by the procedure for the PA creation, was developed with local stakeholders in order to prevent or manage conflicts that could compromise the achievement of the management objectives of the Barren Islands MPA in creation.

|   |
|---|
| <p><b><i>Management Objectives of a Category VI NPA</i></b></p> <p><i>Main management objectives:</i></p> <ul style="list-style-type: none"> <li>• <i>Ensure the long-term protection and maintenance of the site's biological diversity and other natural values.</i></li> <li>• <i>Promote sound management practices to ensure sustainable productivity.</i></li> <li>• <i>Protect natural resources from all forms of use that may adversely affect biological diversity.</i></li> </ul> <p><i>Secondary management objectives:</i></p> <ul style="list-style-type: none"> <li>• <i>Promote environmental education.</i></li> <li>• <i>Valorize traditional and local systems (institutions, know-how and knowledge) for the sustainable use and management of the concerned natural resources.</i></li> </ul> <p><i>MINENVEF, SAPM, General guidelines on the categories and types of governance of Protected Areas.</i></p> |
|---|

This document describes the Grievance Mechanism for this project, outlining the procedures that Blue Ventures will follow to address any comments, suggestions, questions and complaints that stakeholders may have about the Project and its activities. The Grievance Mechanism has been developed in alignment with international good practice, including the Blue Action Fund Environmental and Social Management System (ESMS) requirements and the World Bank Environmental and Social Standards (notably ESS10), and also complies with Madagascar's government requirements as well as BV's policies and procedures.

Table 5 - Blue Action Fund requirements for Grievance Management

| Blue Action Fund requirements                   | Project design     |                | Project implementation    |                           |                       |
|---|--------------------|----------------|---------------------------|---------------------------|-----------------------|
|   | Concept note stage | Proposal stage | Inception Phase           | Annual (or end of Year 1) | Project closing phase |
| Provisional Grievance Mechanism                 | Na.                | Required.      | Na.                       | Na.                       | Na.                   |
| Established Grievance Mechanism                 | Na.                | Na.            | Required: within 3 months | Required                  | Required              |
| Grievance Mechanism Implementation <sup>3</sup> | Na.                | Na.            | Na.                       | Required                  | Required              |

A grievance is considered to be any complaint, comment, question, concern, suggestion about the way a project is being implemented. It may take the form of specific complaints about impacts, damages or harm caused by the

<sup>3</sup> As the Grievance Mechanism has already been established, implementation refers to the use, responsiveness and monitoring of the Grievance Mechanism.

project, non-conformity with the Blue Action Fund and BV’s safeguards, concerns about access to the project stakeholder engagement process or about how comments and concerns about project activities, or perceived incidents or impacts, have been addressed.

## 4.2. Purpose and scope of the Grievance Mechanism

A Grievance Mechanism is a free, open and accessible mechanism, principally designed for Project Affected People, and accessible to all project stakeholders and project staff. It is part of a suite of a safeguard instruments.

Specifically, this Grievance Mechanism aims to:

- Guide BV in addressing complaints comments, questions, concerns and suggestions from Project Affected People and other rights holders and stakeholders, related to the project and its activities in a fair and transparent, and practical manner;
- Identify and manage stakeholder concerns and thus support effective risk management for the project;
- Provide stakeholders fearing or suffering adverse impacts from the project with the assurance that they will be heard and assisted in a timely manner;
- Build and maintain trust with all stakeholders thereby creating an enabling environment in which to operate; and
- Prevent adverse consequences of failure to adequately address grievances.

As such, the Grievance Mechanism does not intend to substitute for any existing grievance procedures, but instead complement and build on existing procedures, while ensuring that the BV can identify, register and respond to grievances appropriately. This Grievance Mechanism reflects and operates under the good practice principles illustrated in Figure 1 below.

*Table 6 - Good practice of the ESMS Grievance Mechanism (Source: IUCN 2020a)*

|                                      |   |
|--------------------------------------|---|
| <b>Accessible</b>                    | Mechanism is fully accessible to all parties that might be affected by the project.   |
| <b>Practical</b>                     | Mechanism is cost-effective and practical in its implementation and doesn’t create a burden for project implementation.                   |
| <b>Effective and timely response</b> | The provisions and steps for responding to complaints and seeking solutions are effective and timely.                                     |
| <b>Transparent</b>                   | Decisions are taken in a transparent way and complainants are kept abreast of progress with cases brought forward.                        |
| <b>Independent</b>                   | Oversight body and designation investigator is independent from project management.   |
| <b>Protection from retaliation</b>   | Procedures are in place to protect the complainant and minimize the risk of retaliation.  |
| <b>Maintenance of records</b>        | Diligent documentation of negotiations and agreements and good maintenance of records on all cases and issues brought forward for review. |

This mechanism will be used for the protected area. Conflicts in the Barren Islands have existed for a long time.

In light of the explanations of the participants in the village focus group meetings, the conflicts in the Barren Islands can be grouped into 3 categories:

- Conflicts over the exploitation of natural marine and forest resources;
- Conflicts of interest related to economic and social issues;
- Conflicts related to actors.

The main causes identified during the village focus group meetings are:

- Insufficient collaboration between local structures (Dina Committee, community surveillance agents) and deconcentrated technical services;

- Ambiguity of the missions assigned to each of the entities (technical services, local authorities, local village structures);
- Refusal to respect the laws or the Dina;
- Inertia of those in charge in the face of the violation of the law;
- Non-recognition of community surveillance officers by third parties due to lack of uniforms and equipment;
- Insecurity of Community surveillance officers in their surveillance duties. There have even been cases where Community surveillance officers have been threatened by crews of industrial trawlers with firearms.
- Lack of IGAs alternative (raised especially by mangrove farmers);
- Cronyism, favouritism and corruption in the application of the Dina and even the laws;
- Uncontrolled migration.

### 4.3. Eligibility

BV has established the eligibility criteria for the Grievance Mechanism during the ESA project. In this version of the Grievance Mechanism, criteria of eligible grievances include:

- Any community, organisation, project stakeholder or affected group (including individuals) who believe it is negatively affected by any project activities implemented by BV, and owing to the project's failure to follow the Blue Action Fund and BV Environmental and Social Safeguards and other compliances as set out in the ESMS, during the design or implementation of the Project activity is considered a "Project Affected Party" and is entitled to submit a complaint;
- Negative impacts can include all forms of project impact, including direct and indirect impacts of project activities. As with the scope of application of the Blue Action Fund ESMS, negative effects are not restricted to the activities of the BV but include the effects of activities of project partners<sup>4</sup> (including collaborating project partners such as Protected Area authorities) that are financially or technically supported by the project ;
- Any Project Affected Party may file a complaint;
- Representatives can submit a complaint on behalf of a Project Affected Party, but they must provide concrete evidence of authority to represent them; and
- Anonymous complaints will be considered.

On the other hand, the current criteria for ineligible grievances include:

- Complaints with respect to actions or omissions that are not technically or financially supported by the Project, or about parties that are not partners or collaborating partners in the Project;
- Complaints about issues outside of the Project scope, including outside of the Project Area of Influence;
- Complaints filed after the date of official closure of each project.
- Complaints that relate to the laws, policies, and regulations of Madagascar unless this directly relates to the BV obligation to comply with the Project's ESMS principles, standards and procedures;
- Complaints that relate to the BV non-project-related housekeeping matters, such as finance, human resources and administration; and
- Complaints submitted by the same claimant on matters they submitted to the Grievance Mechanism earlier, unless new evidence is provided.

Each grievance will be reviewed by BV site Leader (who is the BV Health, Safety and Safeguarding focal point in the field) in order to determine if it is eligible or ineligible. If the complaint is not eligible, this focal point will inform the complainants stating the reason for ineligibility and this will be documented.

#### ***Project staff and contractors:***

In addition to Project Affected Parties, this Grievance Mechanism is available for project staff, including contractors and volunteers.

### 4.4. Grievance Procedures

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<sup>4</sup> Note that in these cases, where the Project cannot effectively respond to a grievance because it is related to a government partner, and it is outside of the lead NGOs mandate to respond to such grievances, the grievance can be registered (see Annex F.1), and the government partner informed of the nature of the grievance. The affected party would be informed of the mandate of the lead NGO and directed towards the appropriate channels to report the grievance to the government partner. How this works in practice varies considerably. Projects should consider this eventuality when planning activities, particularly in projects with law enforcement and access restrictions, and encourage and support partners to establish or improve Grievance Mechanisms where this is the case.

Blue Ventures has established [Health, Safety and Safeguarding structures](#) in place. There is a global team based in the UK who supports the BV Madagascar National Health, Safety and Safeguarding Officer, based in Antananarivo. Each site has a designated Health, Safety and Safeguarding focal point. If staff have a grievance, they can first report it to their line manager or the designated Health, Safety and Safeguarding focal point. Community members can reach out to the focal point who will scale the matter up to the National Health, Safety and Safeguarding Officer who will similarly raise the concern with the global HSS committee. The committee will decide how to handle the case. The Safeguarding and Reporting Committee comprises trustees and members of staff. In addition, three members of our team, oversee safeguarding training and support as a key part of their work.

Blue Ventures has clear policies, procedures and governance in place that provide a safeguarding framework that everyone who works with us is made aware of through induction and training. Relevant policies, procedures and governance oversight includes our:

1. [Code of Conduct](#)
2. [Protection Policy for Children and Vulnerable Adults](#)
3. [Whistleblowing and Reporting procedure](#)
4. [Safeguarding and Reporting Committee](#)

Various measures have already been taken to prevent conflicts at site level, including:

- The involvement of the riparian communities concerned, both in the process of setting up the future NPA and in the management of the NPA. Indeed, in order to guarantee the legitimacy of the future MPA, the riparian communities were involved in the various stages of creation through i) the village plenary general assemblies of information-awareness or validation, ii) the village focus group meetings in the elaboration of technical documents and in the direct village public consultations, iii) the empowerment of the local communities in the management of the future MPA through the VMNB Association, which is expected to be a co-manager;
- The elaboration of a Fisheries Management Plan to which the documents relating to the creation of the MPA were referred, among other reference frameworks;
- The elaboration of a Dina as well as the setting up of a Dina Committee for its application;
- The establishment of a Community Monitoring Committee.
- Other measures are planned for conflict prevention:
- Wide dissemination of the Fisheries Management Plan;
- Wide dissemination of the Dina and the rules for managing the MPA being created;
- Involvement of the various stakeholders (local authorities, State technical services, MPA co-managers) through a charter of responsibilities.

A grievance mechanism has been developed with the stakeholders. It is mainly based on the organization that has already been put in place, but which needs to be strengthened.

However, it is important to note that the conflict we are talking about here is without physical violence or other life-threatening acts (e.g. threatening with a firearm or sharp weapon). In such a case, the law enforcement agencies are seized of the case unless the two parties agree otherwise.

The conflicts, which are the object of this mechanism, can be a conflict between the members of the communities of the same Commune, between the members of the communities of two or more Communes.

As mentioned above, conflicts between members of the same community or between communities of the same Commune have already occurred. 2 cases may arise:

- The dispute concerns the application of the Dina. In such a case, the complainant calls on the Akio kary surveillance officers who in turn refer the matter to the Dina Committee and the Chief of the camp. They summon the parties in conflict for mediation based on the provisions of the Dina;
- If mediation fails, the Committee forwards the case to the Fokontany Chief(s) and the Olobe(s) of the localities where the two parties live. The latter, in the presence of the two parties, deal with the conflict at the same time on the basis of Dina and fihavanana in order to maintain cohesion within the communities and harmonious cohabitation;

In case of failure, the Mayor, the Fokontany Chief(s) and the Olobe(s) of the localities of residence of the conflicting parties, always in the presence of the conflicting parties, try to find a compromise so that the matter does not go further;

In case of failure of this commission composed of the Mayor, the Fokontany chiefs and the Olobe, the District Chief deals with the case as a last resort for an amicable settlement;

If this fails, the case is referred to the Tribunal.

If the conflict does not concern the application of the Dina, i.e. a case not provided for by the Dina, mediation begins at the level of the Fokontany Chief or Chiefs and the Olobe of the locality or localities of residence of the two parties in conflict.

The same provisions as above prevail except that the administrative authorities (Fokontany Chiefs, Mayors, District Chiefs) and traditional authorities (the Olobe of the places of residence of the parties in conflict) intervene at their respective levels in relation to the mediation level.

However, the parties to the dispute or the Authorities may also have recourse to an impartial external mediator recognized by both parties to the dispute.

In the case of a conflict between members of a community and third parties, the parties in conflict have a choice. Either they bring the matter before the Mayor of the Commune or the District Chief of the place of conflict, or the parties decide to have recourse to an impartial Mediator whom they recognize.

If mediation fails, either by the Local Authorities or by an Ombudsman, either party may take legal action.

The grievance resolution procedure for the Project comprises three stages/steps, described in below. In order to be practical and cost-effective, resolution of complaints should be sought at the lowest possible level. This procedure aims to address stakeholder concerns promptly, effectively and transparently.

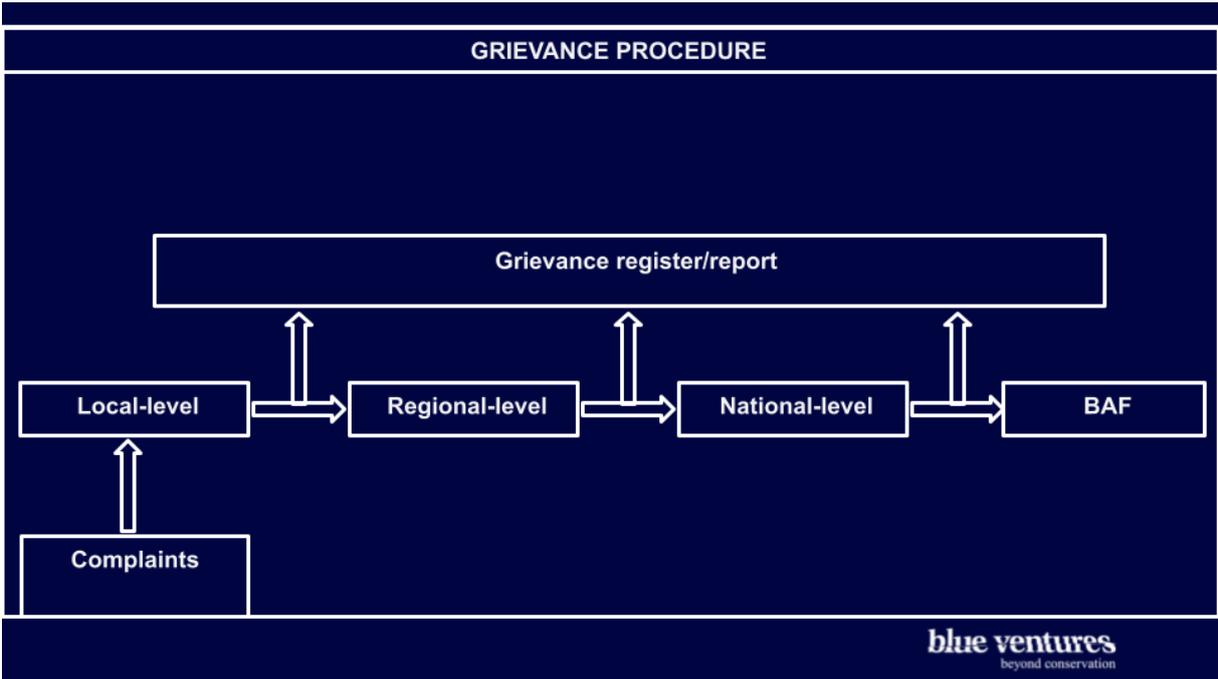


Figure 2 - A grievance procedure

#### 4.5. Informing Stakeholders about the Grievance System

For the Grievance Mechanism to be effective and accessible, BV will take active steps to inform all relevant project stakeholders of the existence and scope of the Grievance Mechanism and about the relevant provisions of the ESMS. It is vital that stakeholders are aware of the eligibility criteria for a grievance and the mechanism for grievance submission. This should ideally be completed during the stakeholder consultation during project design [prior to project proposal submission] and would be completed no later than the first quarter of project implementation.

BV will align the Grievance Mechanism procedures with good international practice, meaning it will be:

- **Accessible:** All field offices and field staff will have information on the Grievance Mechanism and how to register complaints; all stakeholders will have information on the Grievance Mechanism and how to register complaints;
- **Practical:** The mechanism established ensures that it is simple and viable and does not create a burden for project implementors or project stakeholders;
- **Transparent:** Decisions will be taken in a fair and transparent manner and the complainants will be kept updated of the process;
- **Independent:** The oversight body and designated team will be independent from project management where the grievance/ complaint originates; and
- **Time Bound:** The process for resolution will be comprehensive and completed in a timely manner.

This will be done by translating the Grievance Mechanism into Sakalava, ensuring that the information is delivered in a culturally appropriate way reaching all relevant stakeholder groups, including women and vulnerable groups. Various methods will be used to raise awareness about the Grievance Mechanism and procedures. In addition, grievance boxes will be placed at meetings and in training sessions. The grievance will be submitted in Malagasy languages.

Accessibility also requires that complaint submission, handling and recording is designed in such a way that stakeholders have confidence in the mechanism and that procedures are in place to protect complainants from any form of retaliatory action, including provisions for disciplinary or other appropriate action in case of violations of this principle. BV will ensure that all stakeholders are aware of this.

#### 4.6. Serious Incident Reporting

BV will report all serious incidents caused by or related the Project that have or could have significant negative impacts on people or on the environment, to the Blue Action Fund. The purpose of reporting serious incidents is to ensure that appropriate responses and corrective actions are taken in a timely manner in order to minimise, mitigate and/or remedy the impacts as well as to avoid repeat occurrences.

A serious incident in this context is defined as: “any unplanned or uncontrolled event with a materially adverse effect on workers, community members or the environment within the project’s Area of Influence or events that have the potential to have material or immaterial adverse effects on the project execution or give rise to potential liabilities or reputational risks” (IUCN 2020b, Reporting Serious Incidents). Serious incidents can include, for example:

- Fatalities, serious injuries and accidents at work;
- Fatalities, serious injuries and accidents affecting local communities and others;
- Violations of human rights, including sexual and gender-based violence and harmful child labour;
- Forced evictions;
- Conflicts, disputes and disturbances leading to loss of life, violence or the risk of violence; and
- Environmental impacts.

As such, and due to the risks of association, serious incidents that relate to collaborating partners that the project technically or financially supports, should also be reported, if they occur in the project area, even if they are not directly related to a project activity.

In the case of a serious incident, the incident will be reported by BV to the Blue Action Fund Project Manager and the Blue Action Fund ESMS Coordinator within 48 hours of BV receiving information of the incident occurring. In cases where detailed information is not immediately available, a draft report will be prepared by BV and submitted, with a more comprehensive update being prepared once the details have been established. The report will state whether the incident will be subject to a formal inquiry, criminal investigation or legal proceedings to determine the circumstances of the incident, responsibilities and root causes.

If the incident is not subject to a formal inquiry or legal proceedings, the report will follow the template provided in Annex.

If the incident is subject to a formal inquiry or legal procedure, the findings of the inquiry will be summarised, using the template in Annex, along with a link to and/or an electronic copy of the inquiry's final report, if it is made available to the public. BV will inform Blue Action Fund about any ongoing or future issues related to the incident that may require attention, such as grievances, claims for compensation or other legal action taken by the victims' families.

#### 4.7. Maintaining Records and Monitoring Actions

All grievances, whether eligible or not, need to be recorded in a Grievance Register (Annex F.1). This register will document all complaints, suggestions, comments, questions submitted by stakeholders in a categorical way under five main headings:

1. Grievance registration: including subject of complaint, description of complaint and eligibility criteria;
2. Acknowledgement: BV acknowledges receipt of the grievance within a week;
3. Investigation (of eligible grievances only): BV investigates the root cause, whether the claim is true or false and proposes corrective actions;
4. Response: BV provides a response to the complainant; and
5. Close out: BV closes the grievance once it has been adequately addressed and remedied and a response provided to the complainant.

Agreed action plans will establish timeframes for regular process monitoring towards resolution of the grievance. Site Leader will coordinate the monitoring by organising periodic checks, bringing together the concerned parties and relevant technical advisors for meetings or other communication on the status of action plans, until they are completed. BV will assess the effectiveness of this complaint's resolution process on an annual basis and identify any needs for improvement.

The Grievance Mechanism and accompanying grievance Register will be maintained, saved in a secure place and updated regularly. The indicators used to monitor and evaluate the effectiveness of a Project's Grievance Mechanism are listed below, and all can be monitored simply through use of the Grievance Register template:

- Number of grievances received and recorded;
- Number of grievances resolved and unresolved.
- Number of serious incidents;

### 5. Monitoring, Evaluation and Reporting

BV will update the SEP through the lifetime of the project, in particular whenever there have been changes to the project, additional stakeholder activities or when particular milestones (e.g., agreements with communities) have been reached.

Monitoring and reporting of stakeholder engagement activities will help the Project track issues/ concerns, thereby providing an understanding of trends which will help pre-empt risk management activities. Furthermore, by monitoring and evaluating the Project's performance with regard to stakeholder engagement will allow for its efficacy to be evaluated and improved where necessary.

Projects should update the stakeholder register and planned engagement regularly, and at least on an annual basis. Through updating the register, the project can track some basic indicators which are commonly used to monitor and evaluate the effectiveness of a Project's stakeholder engagement programme, including:

- List of stakeholder events/ activities carried out during the reporting period and the stakeholders targeted ;
- Number of participants at each event/ activity ;
- Percentage of follow-up actions addressed/ completed during the reporting period ;
- Proportion of year's planned stakeholder engagement completed during the reporting period.

**Annex 1: Stakeholder register**

| Stakeholder (group or individual) | Contact details | Date of meeting | Location of meeting | Summary / Issues raised | Follow up Actions | Status (closed / Open) |
|-----------------------------------|-----------------|-----------------|---------------------|-------------------------|-------------------|------------------------|
|                                   |                 |                 |                     |                         |                   |                        |
|                                   |                 |                 |                     |                         |                   |                        |
|                                   |                 |                 |                     |                         |                   |                        |
|                                   |                 |                 |                     |                         |                   |                        |

## Annex 2: Template for Public Grievance Form

|  |   |
|--|---|
| <b>Public Grievance Form</b>   |   |
| <b>Reference No. (assigned by Implementation Partner):</b>   |   |
| Please enter your contact information and grievance. This information will be dealt with confidentially.<br>Please note: If you wish to remain anonymous, please enter your comment/ grievance in the box below without indicating any contact information – your comments will still be considered. |   |
| <b>Full Name</b>   |   |
| <b>Anonymous submission</b>  | <input type="checkbox"/> <b>I want to remain anonymous</b>  |
| <b>Please mark how you wish to be contacted (mail, telephone, e-mail).</b>   | <input type="checkbox"/> <b>By mail (please provide mailing address):</b><br>_____<br><input type="checkbox"/> <b>By telephone (please provide telephone number):</b><br>_____<br><input type="checkbox"/> <b>By e-mail (please provide e-mail address):</b><br>_____ |
| <b>Preferred language for communication</b>  | <input type="checkbox"/> <b>Malagasy</b><br><input type="checkbox"/> <b>French</b><br><input type="checkbox"/> <b>Other, please specify: English</b> _____  |
|  |   |
| <b>Description of incident or grievance:</b>   | What happened? Where did it happen? Who did it happen to? What is the result of the problem?  |
|  |   |
| <b>Date of incident/grievance:</b><br>_____  | <input type="checkbox"/> <b>One time incident/ grievance (date _____)</b><br><input type="checkbox"/> <b>Happened more than once (how many times? _____)</b><br><input type="checkbox"/> <b>On-going (currently experiencing problem)</b>                             |
|  |   |
| <b>What would you like to see happen to resolve the problem?</b>   |   |
|  |   |

## Annex 3: Template for a Serious Incident Report

Source: IUCN 2020b

| Serious Incident Report  |   |
|--|---|
| <b>General Information</b>   |   |
| Project name, country, region  |   |
| Executing Agency   |   |
| Person and agency submitting the information   |   |
| Organisations, agencies and/or companies involved in the incident  |   |
| Details of the people affected, status (e.g., if they are working as rangers, volunteers, etc.), names, ages, gender. Details of the community or communities involved |   |
| <b>Details of the Incident</b>   |   |
| Date and time the Incident occurred  |   |
| Location   |   |
| Type of Incident   | Fatalities, serious injuries and accidents at work <input type="checkbox"/>   |
|  | Fatalities, serious injuries and accidents affecting local communities and others <input type="checkbox"/>  |
|  | Violations of human rights or accusation of human rights violations, incl. sexual and gender-based violence and harmful child labour <input type="checkbox"/> |
|  | Forced Eviction <input type="checkbox"/>  |
|  | Conflicts, disputes and disturbances leading to loss of life, violence or the risk of violence <input type="checkbox"/>                                       |



|  |  |      |      |
|--|--|------|------|
|  | Environmental incidents <input type="checkbox"/> |      |      |
| Detailed chronological description of the Incident and its circumstances (if possible, with photos)  |  |      |      |
| <b>Root Cause Analysis</b>   |  |      |      |
| Detailed description of key causal factors (internal and external), potential management failings and identification of absent/ inadequate/ failed/ unused management and control measures (e.g., non-compliances with ESMS standards or measures) |  |      |      |
| Specification of relevant roles and responsibilities of the agencies, authorities and others involved  |  |      |      |
| Reaction to the incidents by the victims, involved families or communities as well as local/ national/ international media   |  |      |      |
| Agency or agencies responsible for investigation of the case. What is the scope of the investigation? Does this include a root cause analysis?   |  |      |      |
| <b>Response and Corrective Actions</b>   |  |      |      |
| Description of the response (if available) and agencies involved   |  |      |      |
| Description of any corrective actions, plans or next steps to prevent the incident from recurring or follow up to close the case or proceed with further investigations (include action plan with responsibilities and schedule)                   |  |      |      |
| <b>Incident Report Approval</b>  |  |      |      |
|  | Position   | Name | Date |
| Prepared by  |  |      |      |
| Approved by (Blue Action Fund ESMS Coordinator)  |  |      |      |

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| <b>What would you like to see happen to resolve the problem?</b> |
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