

---

# ENVIRONMENTAL AND SOCIAL CODE OF PRACTICE FOR GRID UPGRADING

---

Accelerating Renewable Energy Integration and Sustainable Energy (ARISE)  
Project



# Table of Contents

- List of Abbreviations.....ii
- 1. Introduction..... 1
  - 1.1 Project Description and Objectives ..... 1
  - 1.2 Construction Method ..... 2
    - 1.2.1 Laying of underground Electrical cables and Communication Fibre Network..... 2
    - 1.2.2 Construction of Substations ..... 3
  - 1.3 Implementation Schedule of the Project ..... 5
- 2. Risks and Benefits of the Project..... 6
  - 2.1 Summary of Benefits of the project ..... 6
  - 2.2 Potential Risks/ adverse impacts of the Project..... 7
- 3. Code of Good Practice ..... 17
- 4. Monitoring..... 39
  - 4.1 Project Monitoring Requirements..... 39
  - 4.2 Monitoring Report Format and Schedule ..... 47
- 5. Conclusion ..... 48
- References..... 49
- Annex -1 Project Estimate Schedule ..... 50
- Annex 2: Impact/Risk Assessment Method..... 51
- Annex 3: Mitigation & Monitoring Commitment Letter format for Contractor and Utility..... 58
- Annex 4: Health and Safety Requirements ..... 59
- Annex 5: Covid 19 Guideline ..... 68
- Annex 6: Summary of Applicable Laws and Policies ..... 82
- Annex 7: Grievance Redress Mechanism ..... 108

## List of Abbreviations

<b>BESS</b>	Battery Energy Storage System
<b>ESCP</b>	Environmental and Social Code of Practice
<b>SAP</b>	Strategic Action Plan
<b>MECCT</b>	Ministry of Environment Climate Change and Technology
<b>PMU</b>	Project Management Unit
<b>ESSR</b>	Environmental and Social Screening Report
<b>GAP</b>	Gender Action Plan
<b>MNACI</b>	Maldives National Association for Construction Industry
<b>EPA</b>	Environmental Protection Agency
<b>EPZ</b>	Environment Protection Zone
<b>GRM</b>	Grievance Redress Mechanism
<b>LMP</b>	Labour Management Procedures
<b>PPE</b>	Personal Protective Equipment
<b>ESMF</b>	Environmental and Social Management Framework
<b>SEP</b>	Stakeholder Engagement Plan
<b>URA</b>	Utility Regulatory Authority

# 1. Introduction

## 1.1 Project Description and Objectives

This document provides code of environmental and social good Practices that needs to be followed by the contractor/supplier/operator when undertaking Grid Upgrading works under Accelerating Renewable Energy Integration and Sustainable Energy (ARISE) project. The aim of the Project is to increase renewable energy generation capacity and to enhance the financial and environmental sustainability of the power sector in Maldives by improving the investment climate and thereby facilitating investment by independent power producers, development of battery energy storage systems (BESS), upgrading and reinforcement of select grid systems, and procurement of technical assistance. The governance arrangements for the Project comprise the Project Steering Committee and the Project Technical Committee. The implementing agency of ARISE is the Ministry of Environment Climate Change and Technology (MECCT) within which a Project Management Unit (PMU) is established for the implementation of the project. The sub projects under the program will be implemented in close collaboration with state owned electricity service providers (at present Fenaka and Stelco) and the local councils. This project helps to achieve the objectives of the Strategic Action Plan (SAP) of the government. As per the Strategic Action Plan (SAP) 2019 to 2023 (<https://presidency.gov.mv/SAP/>) of the government it is a target (Target 2.1) of the government to achieve 20 percent increase of renewable energy in National Energy mix by 2023 when compared to 2018 levels (GoM, 2019). To attain this target, the ministry aims to achieve 70% of peak load of electricity from renewable energy sources from all inhabited islands. Moreover, during the Climate Ambition Summit of 2020 the President of the Maldives had announced a target to become carbon neutral by 2030 (UNFCC, 2020). This project facilitates to achieve these objectives as existing grids of most of the project islands require upgrading works in order to facilitate for large PV penetration and BESS without disruptions.

At the time of writing, a total of 23 islands have been identified for the project and additional islands are likely to be considered in additional phases of the project. As per the ESMF of the project each project needs to undertake Environmental and Social Screening and an Environmental and Social Screening Report (ESSR) needs to be prepared for each sub-project. This ESCP for Grid Upgrading will be adopted where the outcomes of the ESSR recommends ESCP. The primary scope will include strengthening network capacity; deploying supervisory control and data acquisition (SCADA) systems; and optimizing interactions among renewable energy generation, BESS, and existing conventional



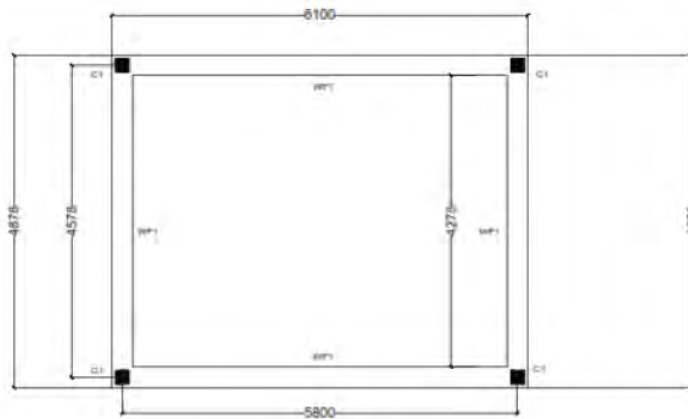
- Only excavated material for trenching shall be used for backfilling or sand purchased specifically for this purpose.
- The trench shall be filled and levelled by the contractor to the existing level prior to trenching.
- Where several cables occupy the same trench appropriate distances and separation methods shall be used as per the installation standards of URA.

Some of the islands where cables are to be laid have paved roads and dedicated ducts for cable laying in these islands the dedicated ducts shall be utilized for installation of the cables.

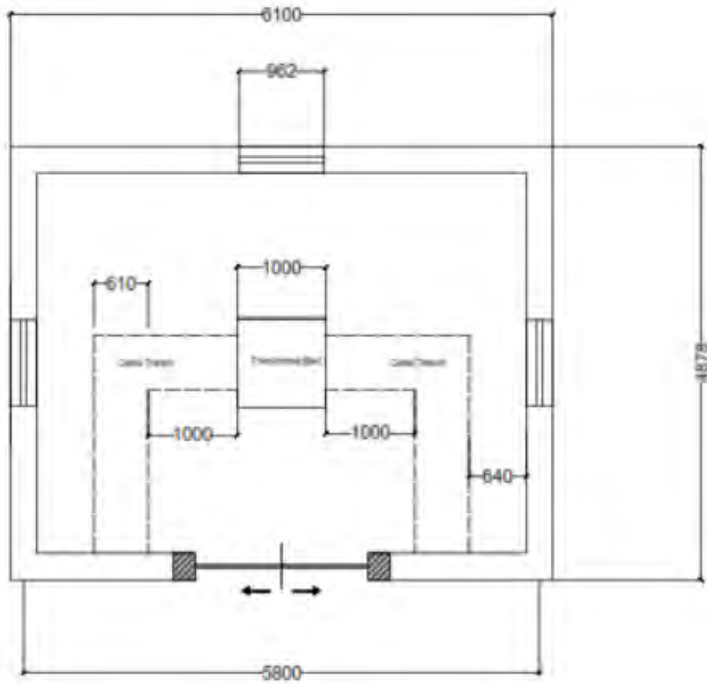
In some islands the cables cross asphalt roads and there are no appropriate crossing provisions. In such cases the contractor will be required to cut the asphalt and resurface following cable burying works or alternatively the contractor may use horizontal directional drilling for crossing of asphalt roads.

### 1.2.2 Construction of Substations

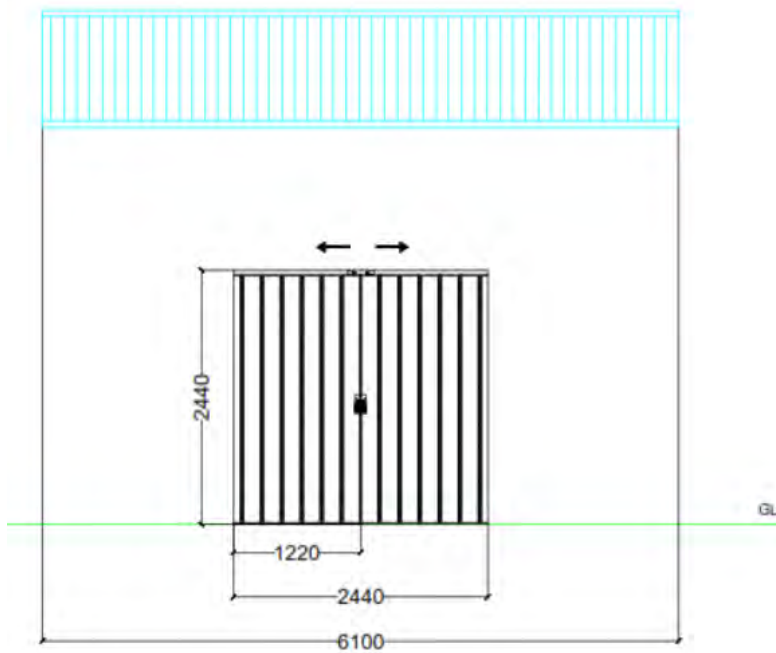
For islands where MV networks are to be installed Substations need to be constructed to house the transformers and the related switch gear units. The Figure below shows are typical layout drawing of substations to be constructed under the project.



Foundation Details



Floor Plan



Front elevation

The steps involved in construction will be for a simple single-story building with raft foundation. The steps can be summarized as below:

1. Clearance of shrubs and levelling

2. Foundation works (raft foundation)
3. Brick works
4. Finishing works

Other than cable laying and substations construction, internal works within the powerhouse, existing substations and installation of distribution boxes will be undertaken in all islands.

### 1.3 Implementation Schedule of the Project

Estimated time frame for the implementation of the project is provided in Annex 1. As per the current schedule, mobilization is expected to occur during second quarter of 2022 and commissioning of all islands to occur during 2023 (Annex 1).



## 2. Risks and Benefits of the Project

Prior to preparing the code of practice for the contractor, it is important to identify the potential risks or impacts of the project in order for the appropriate mitigation measures to be defined under the code of practice. The risks or impacts of the project were identified using Rapid Impact Assessment Method (RIAM) (Jalava, Kuitunen and Ijäs 2010). Detailed description of the assessment method is described in Annex 2.

### 2.1 Summary of Benefits of the project

As can be seen from the outcomes of the assessment Annex 2 the benefits of the project outweigh the risks. The average rating of positive impacts are +D which corresponds to significant positive impact in RIAM scoring description (Annex 2). The benefits of the project include that it will increase reliability of electricity provided in these islands, ensure renewable energy penetration into the grid and provide various training and job opportunities to locals. Moreover, through the Gender Action Plan (GAP) that was developed for the project the project aims to address the gender gap that exists in the energy sector of Maldives. To address this gap special provisions are given to women when undertaking trainings through the project. Moreover, once the hybrid system of Solar PV and BESS is operational it will lead to significant environmental and economic benefits. In this regard, the table below summarizes the benefits island wise for the first two phases of the project:

Table 1 ARISE project benefits by island

Atoll	Island Grid*	Total PV (MW)	Diesel Savings (Litres) (3.7kWH/Litre)	Diesel Savings (8MVR/Litre)	Co2 reduced (MT)	Carbon sequestration by equivalent no of plants
			Litre	MVR	7.07*10 <sup>-4</sup> metric tonnes/kWh	1 tree= 0.025 TCO2/year
S	Addu (Mainland) ***	11	4,971,892	39,775,135	13,006	520,238.88
S	Addu (Huluhmeedhoo)	2	789,189	6,313,514	2,064	82,577.60
Gn	Fuvahmulaku	2	789,189	6,313,514	2,064	82,577.60
GDh	Thinadhoo	2	966,757	7,734,054	2,529	101,157.56
HDh	Kulhudhuffushi	1.5	907,568	7,260,541	2,374	94,964.24
B	Eydhafushi	1.5	789,189	6,313,514	2,064	82,577.60
Lh	Hinnavaru	1	394,595	3,156,757	1,032	41,288.80
L	Fonadhoo	2	789,189	6,313,514	2,064	82,577.60
L	Gan (Mukurimagu)	2.5	986,486	7,891,892	2,581	103,222.00
L	Dhanbidhoo	0.2	78,919	631,351	206	8,257.76
L	Isdhoo	0.4	157,838	1,262,703	413	16,515.52

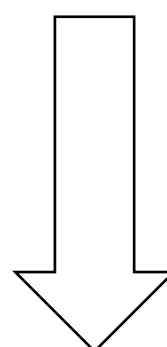
L	Kalaidhoo	0.4	157,838	1,262,703	413	16,515.52
L	Maabaidhoo	0.5	197,297	1,578,378	516	20,644.40
L	Maamendhoo	0.5	197,297	1,578,378	516	20,644.40
L	Kunahandhoo	0.2	78,919	631,351	206	8,257.76
L	Hithadhoo	0.3	118,378	947,027	310	12,386.64
L	Maavah	0.5	197,297	1,578,378	516	20,644.40
Lh	Naifaru	1.5	591,892	4,735,135	1,548	61,933.20
GA	Villingili	1.5	710,270	5,682,162	1,858	74,319.84
Sh	Funadhoo	1	394,595	3,156,757	1,032	41,288.80

## 2.2 Potential Risks/ adverse impacts of the Project

As for negative impacts majority of impacts are rated -A, -B or -C which corresponds to slight negative, negative and moderate negative impacts or risks respectively. Only significant negative impacts identified, i.e. rated -D in the table, are impacts and risks related to management of hazardous waste during operational phase and decommissioning phase of the project and fire hazard risks during operation phase of the project. The rating of these risks is high mainly due to the infrastructure available in the country to deal with these aspects in an appropriate manner. In this respect, there is no hazardous waste management facility in Maldives at present. Moreover, the islands in which the projects are undertaken do not have the appropriate capacity to respond to fire, let alone a chemical fire. Regardless, it is important to investigate all negative impacts and risks in detail so that appropriate mitigation measures can be defined to address these risks.

The table below summarizes the risks identified through the impact assessment process. For ease of reference colour codes have been used to differentiate different risk categories. The colour codes used and the corresponding risk level are summarized below.

Colour Code	Risk Level	Score
	Slight Negative	-A
	Negative	-B
	Medium Negative	-C
	Significant Negative	-D
	Major Negative	-E



Risk increases downwards

This assessment focuses primarily on the risks during construction, operation and decommissioning phase of the project, as the aim of this report is primarily to develop a code of practice that the contractors and operators can follow during these phases of the project. The impacts and risks that

occur during the manufacturing process of the batteries are not covered in this section. Some Lithium mines have been criticized for having significant impacts on local habitats at point of production (Muray, 2019).

Table 2 Identified risks for all project phases

<b>(a) Construction Phase</b>		
<b>Aspect</b>	<b>Identified Risks</b>	<b>Overall Risk Score</b>
Terrestrial Flora and Fauna	<ul style="list-style-type: none"> <li>• Damage to coastal vegetation within 20-meter environmental protection zone during transport.</li> <li>• Damage to trees during transport of equipment.</li> <li>• Loss of trees in the cable laying pathway and the transformer location.</li> <li>• Clearance of vegetation outside the footprint of project locations.</li> </ul>	-A
Transport	<ul style="list-style-type: none"> <li>• Disruption of transport activities during cable laying works on the road.</li> <li>• If roads where cable laying activities are undertaken are not levelled properly can lead to transport disruptions. Similarly where asphalt is removed if asphalt is not laid to the required level and quality it can lead to transport disruptions and complaints.</li> <li>• Accidents that occur due to lack of qualified vehicle operators.</li> <li>• Accidents that occur due to lack of required road closures.</li> </ul>	-B
Health and Safety of construction workforce and public	<ul style="list-style-type: none"> <li>• If the trenches are not appropriately protected it can lead to failure and injury to workforce and public.</li> <li>• Injury can occur due to improper use of equipment and machinery.</li> <li>• As it involves electrical works and if proper safety measures are not followed it can lead to electrocution or arc flash burns.</li> <li>• If appropriate Personal Protective Equipment (PPE) are not provided to Labour Force it can compromise health and safety of workforce. This includes PPE such as that related to general construction safety like hard hats, safety shoes, dust masks, gloves etc , electrical safety equipment like safety glasses, insulation gloves etc and also Covid 19 related specific safety equipment including cleaning products, hand washing facilities and masks.</li> <li>• Safety Signs not installed at project site leading to accidents impacting both the workforce and the public.</li> <li>• Transmission of communicable and venerable diseases within workforce and from workforce to the general public.</li> </ul>	-C

	<ul style="list-style-type: none"> <li>• Lack of appropriate briefing and training to staff prior to commencement of construction activities can compromise health and safety of the construction workforce and the general public. Overworked workforce, working more than 48 hours a week is not allowed as per the Employment act of Maldives (Annex 6).</li> <li>• Overworked workforce, working more than 48 hours a week is not allowed as per the Employment act of Maldives (Annex 6). This can compromise health and safety of the workforce and also that of the public, as overworked workforce is more likely to make errors.</li> <li>• Dust can become an issue during concrete mixing which will be required to undertake substations. Crystalline silica particles from concrete if inhaled for a prolonged period can cause cancer.</li> <li>• Open excavations such as cable trenches pose a risk of falling in, or collapse and crushing of workers.</li> <li>• Proliferation of vector borne diseases if open pits and other mosquito breeding sites are left open at construction sites.</li> <li>• If the Covid19 pandemic continues, the virus can spread among workforce and from workforce to public and vice versa.</li> </ul>	
Fire Hazard	<ul style="list-style-type: none"> <li>• When undertaking any electrical works there is risk of fire if appropriate safety measurements are not taken in this context fires can occur, however considering the scope of work the likelihood is very unlikely.</li> </ul>	-A
Noise	<ul style="list-style-type: none"> <li>• Noise generated during construction. Considering the scope of the project, mostly this will be during concrete mixing process for the concrete base. Moreover, during operation of heavy machinery and equipment some noise maybe generated.</li> </ul>	-B
Damage/disruption to public/private property	<ul style="list-style-type: none"> <li>• The roads in the islands of Maldives are very narrow, so if not properly planned during transportation of material may cause damages to public property. However, if properly planned this is very unlikely hence the risk is low.</li> <li>• Excavation close to buildings without appropriate protection can lead to damages to buildings. Cable laying will involve excavation on the roads hence appropriate measures should be undertaken.</li> <li>• If utility lines are not identified prior to excavation works for cable laying can lead to damage to utility lines and disruption of service.</li> <li>• Cable laying works can cause temporary access disruptions to public buildings and private properties.</li> </ul>	-B
Labour and Working Conditions	<ul style="list-style-type: none"> <li>• Improper sanitation and lack of availability of safe drinking water</li> <li>• Use of forced labour in the project workforce</li> <li>• Use of child labour as part of project workforce</li> </ul>	-B

	<ul style="list-style-type: none"> <li>• Project workforce not having a valid work permit</li> <li>• Workforce not provided with their salary and due benefits</li> <li>• Over congestion of workforce in small space</li> <li>• Unhygienic food available for construction workforce</li> <li>• Lack of access to shower facility at worker accommodation</li> <li>• Lack of adequate meals</li> <li>• Pest infestation including mosquito issues at the worker accommodation</li> <li>• Conflicts may occur with local communities if the workforce is not made aware of local values, customs and traditions.</li> </ul>	
Waste management	<ul style="list-style-type: none"> <li>• Risk of construction and demolition waste (this includes, used containers, packaging material, asphalt removed from roads, removed vegetation) being left behind in the island either at the construction site or at the island waste management facility which is not designed to handle such waste.</li> <li>• Liquid waste including waste oil can absorb to the ground soil if not properly managed</li> <li>• Hazardous waste being left behind in the island or being dumped into island waste management centers which are not designed to manage such waste.</li> <li>• Risk of littering by construction work force</li> </ul>	-B
Flooding and water accumulation	<ul style="list-style-type: none"> <li>• Improper levelling following construction works can lead to water accumulation and localized flooding. Especially cable laying works in some islands are undertaken all over the island special emphasis shall be made for appropriate levelling.</li> </ul>	-B
Ground Water	<ul style="list-style-type: none"> <li>• Leakages of construction material/chemicals and liquid waste if not appropriately stored can contaminate the ground water</li> <li>• Dewatering (where required) for extended periods can lead to loss of access to groundwater near locations where dewatering is undertaken. Moreover, dewatering to the sea can lead to salinization of groundwater lens.</li> </ul>	-B
Emissions and air quality	<ul style="list-style-type: none"> <li>• Emissions from vehicles/machinery used, especially if not appropriately serviced will be a negative air pollution risk. Older vehicles and not properly serviced vehicles/machinery can release increased amount of pollutants including carbon monoxide, nitrogen oxide, carbondioxide, sulphudioxide, hydrocarbons, Benzene and Particulates amongst others.</li> <li>• Dust will be generated during concreting works.</li> </ul>	-A

	<ul style="list-style-type: none"> <li>• If stockpiled construction material like sand, cement and aggregate are not covered, especially during windy conditions there is risk of being blown with the wind to air.</li> <li>• During dry periods use of machinery within the construction site can lead to generation of dust.</li> </ul>	
Gender Based Violence	<ul style="list-style-type: none"> <li>• Gender based violence and discrimination within workforce and from workforce to community as well</li> </ul>	-B
<b>(b) Operational Phase</b>		
<b>Aspect</b>	<b>Identified Risks</b>	<b>Overall Risk Score</b>
Fire Hazard and safety measures	<ul style="list-style-type: none"> <li>• Transformers and other electrical equipment also have fire risk. In particular, transformer oil may leak and ignite under fault conditions. Similar energies and risk levels apply for this equipment.</li> </ul>	-B
Emissions	<ul style="list-style-type: none"> <li>• Transformer oil leaks can also lead to some emissions depending on composition.</li> <li>• Emissions from vehicles used for maintenance activities.</li> </ul>	-A
Health and Safety	<ul style="list-style-type: none"> <li>• Health and safety impacts during operational phase mostly occur due to lack of maintenance of transformers, safety equipment and training in operation.</li> <li>• Operational workforce not provided with the needed PPE can compromise health and safety of operational workforce.</li> <li>• Safety signs not installed at the Substations can compromise the health and safety of operational workforce.</li> <li>• Lack of appropriate briefing and training to operational staff can compromise health and safety of the workforce and the to an extent the general public as well.</li> <li>• Overworked workforce, working more than 48 hours a week is not allowed as per the Employment act of Maldives (Annex 6). This can compromise health and safety of the workforce and also that of the public, as overworked workforce is more likely to make errors.</li> </ul>	-C

Labour and Working Condition	<ul style="list-style-type: none"> <li>• Use of forced labour during project operations</li> <li>• Workforce not provided with their salary and due benefits</li> <li>• Use of child labour for operational activities of the project.</li> <li>• Use of parties without a valid work permit during maintenance activities especially</li> </ul>	-C
Flooding	<ul style="list-style-type: none"> <li>• Recently there has been an increase incidence of flooding in the islands of Maldives during stormy weather. If not appropriately designed in terms of raising the transformer hut can lead to flood damage and operational disruptions.</li> <li>• If roads are not levelled appropriately during any maintenance activities that involve excavation (eg: replacing damaged cables etc) can lead to localized flooding.</li> </ul>	-B
Waste management	<ul style="list-style-type: none"> <li>• Over time some components of transformers will need to be replaced. This can potentially produce hazardous/electric waste which needs to be managed appropriately.</li> </ul>	-C
Ground Water	<ul style="list-style-type: none"> <li>• Spillage of any chemicals/oils used for maintenance purposes</li> </ul>	-A
Noise	<ul style="list-style-type: none"> <li>• Noise generated from transformer units. However, this will be very minimal.</li> </ul>	-A
Damage/disruption to public/private property	<p>During major maintenance works the following disruptions may occur:</p> <ul style="list-style-type: none"> <li>• If any excavation activities are undertaken (for example for replacement of cables) it can lead to damage to utility lines and disruption of services if not appropriately mapped and planned prior to commencement of decommissioning works.</li> <li>• If any excavation is undertaken it can lead temporary access disruption to public and private properties.</li> </ul>	-B
Gender Based Violence	<ul style="list-style-type: none"> <li>• Gender based violence and discrimination within workforce and from workforce to community as well.</li> </ul>	-B



<b>(c) Decommissioning Phase</b>		
<b>Aspect</b>	<b>Identified Risks</b>	<b>Overall Risk Score</b>
Waste management	<ul style="list-style-type: none"> <li>Transformers may need to be replaced overtime and also cables may require replacing over long term. However, this will not be during short to medium term period. Electric and hazardous waste will be generated through this process.</li> </ul>	-C
Transport	<ul style="list-style-type: none"> <li>Disruption of transport activities during transport of waste generated during decommissioning process.</li> </ul>	-B
Noise	<ul style="list-style-type: none"> <li>Noise generated during decommissioning. Considering the scope this will be mostly noise associated with machinery and vehicles involved in decommissioning.</li> </ul>	-A
Damage/disruption to public/private property	<ul style="list-style-type: none"> <li>The roads in the islands of Maldives are very narrow, so if not properly planned during transportation of equipment, machinery and waste it can lead to damage to property.</li> <li>If any excavation activities are undertaken (for example for removal of cables) it can lead to damage to utility lines and disruption of services if not appropriately mapped and planned prior to commencement of decommissioning works.</li> <li>If any excavation is undertaken it can lead temporary access disruption to public and private properties.</li> </ul>	-B
Health and Safety	<ul style="list-style-type: none"> <li>The staff of contractor undertaking decommissioning works will also be exposed to various occupational health and safety impacts. <ul style="list-style-type: none"> <li>✓ Injury can occur due to improper use of equipment and machinery.</li> <li>✓ Decommissioning works will involve electrical works and if proper safety measures are not followed can lead to electrocution.</li> <li>✓ Physical damage during decommissioning of transformers can lead to leakages which can lead to physical damage to contractor staff.</li> </ul> </li> </ul>	-C

	<ul style="list-style-type: none"> <li>• Appropriate Personal Protective Equipment (PPE) not provided to Labour Force compromising health and safety of workforce. This include PPE such as that related to general construction safety like hard hats, safety shoes, dust masks, gloves etc , electrical safety equipment like safety glasses, insulation gloves etc and also Covid 19 related specific safety equipment including cleaning products, hand washing facilities and masks.</li> <li>• Safety Signs not installed at project site leading to accidents impacting both the workforce and the public.</li> <li>• Transmission of communicable and venerable diseases within workforce and from workforce to the general public.</li> <li>• Lack of appropriate briefing and training to staff prior to commencement of decommissioning activities can compromise health and safety of the construction workforce and the general public.</li> <li>• Overworked workforce, working more than 48 hours a week is not allowed as per the Employment act of Maldives (Annex 6). This can compromise health and safety of the workforce and also that of the public, as overworked workforce is more likely to make errors.</li> </ul>	
Fire Hazard and End-of-life treatment	<ul style="list-style-type: none"> <li>• When undertaking any electrical works there is risk of fire if appropriate safety measurements are not taken in this context fires can occur, however considering the scope of work the likelihood is very unlikely.</li> </ul>	-A
Labour and Working Condition	<ul style="list-style-type: none"> <li>• Use of forced labour in the project workforce</li> <li>• Use of child labour as part of project workforce</li> <li>• Project workforce not having a valid work permit</li> <li>• Workforce not provided with their salary and due benefits</li> <li>• Improper sanitation and lack of availability of safe drinking water</li> <li>• Over congestion of workforce in small space</li> <li>• Unhygienic food available for construction workforce</li> <li>• Lack of access to shower facility at worker accommodation</li> <li>• Lack of adequate meals</li> <li>• Pest infestation including mosquito issues at the worker accommodation</li> <li>• Conflicts may occur if the workforce is not made aware of local values, customs and traditions.</li> </ul>	-B

Flooding and water accumulation	<ul style="list-style-type: none"> <li>Improper levelling following decommissioning works can lead to water accumulation and localized flooding.</li> </ul>	-B
Ground Water	<ul style="list-style-type: none"> <li>Leakages of oils and other chemicals during decommissioning works if proper mitigation measures are not taken.</li> </ul>	-B
Emissions and air quality	<ul style="list-style-type: none"> <li>Emissions from vehicles/machinery used during decommissioning phase, especially if not appropriately serviced will be a negative air pollution risk. Older vehicles and not properly serviced vehicles/machinery can release increased amount of pollutants including carbon monoxide, nitrogen oxide, carbondioxide, sulphudioxide, hydrocarbons, Benzene and Particulates amongst others.</li> </ul>	-A
Gender Based Violence	<ul style="list-style-type: none"> <li>This can occur within decommissioning workforce and from workforce to community as well</li> </ul>	-B

### 3. Code of Good Practice

The code of good practice is developed to address the risks identified in Table 3 of chapter 2.

The main responsibility of implementation for the construction phase good practices will be by the contractor and the responsibility for implementation for operational phase and decommissioning phase will be that of Utility. During project period Ministry will ensure that these actions are implemented by the contractor and Utility through regular supervision and monitoring activities.

The Table below summarizes the risks and the code of practices to be followed by the supplier/contractor (Table 4). Annex 3 provides the format for commitment letter for operator and contractor of the project to implement these practices. Moreover, the ESCP will constitute part of project contracts.

Table 4 Description of good practices to following during the project phases

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
<b>Risk/Impact 1: Loss of Vegetation</b>				
<p>1.1 During site selection, as much as it is practicable sites with no vegetation shall be given preference.</p> <p>1.2 Where trees and palms fall within the project footprint, option to relocate any trees and palms shall be considered first.</p> <p>1.3 If relocation is not feasible due to status of the tree/palm (for example palms that are too old and unlikely to survive elsewhere) or due to lack of available space to replant for every tree/palm removed two trees /palms need to be planted at a location identified by the city council.</p> <p>1.4 No vegetation within the 20 m coastal zone shall be removed for the purpose of the project.</p> <p>1.5 No vegetation within 15 m of EPA designated environmental sensitive areas or protected area should be removed for the purpose of the project.</p> <p>1.6 No protected trees, trees of cultural value or those important to the community (example banyan trees) shall be removed as part of the</p>	Relevant	Relevant	Not relevant	Not relevant

<b>Good Practices</b>	<b>Pre-Construction Phase</b>	<b>Construction Phase</b>	<b>Operation Phase</b>	<b>Decommissioning Phase</b>
<p>project. The implementing entity shall inquire prior to commencing works the importance of the trees on site with the local council and communities.</p> <p>1.7 A list of trees to be removed will be prepared and approved by the Island Council team.</p> <p>1.8 Tree removal shall be conducted in line with Regulation on cutting down, transport and uprooting of trees and palms from one island to another, Regulation on Protected Trees and Planning Regulations (see Annex 6) for details.</p>				
<b>Risk/Impact 2: Disruption of transport activities</b>				
<p>2.1 Minimize risk of electrical hazards, fire, or exposure of hazardous material during transport via ensuring use of appropriate transport vessels/vehicles, proper signage, packaging with signage and instructions to handlers.</p> <p>2.2 Shall ensure that the harbors of each island have adequate space to undertake unloading of the containers. Shall coordinate with Island Council to determine the best location.</p>	Not relevant	Relevant	Maybe relevant during maintenance	Relevant

<b>Good Practices</b>	<b>Pre-Construction Phase</b>	<b>Construction Phase</b>	<b>Operation Phase</b>	<b>Decommissioning Phase</b>
<p>2.3 Transport route for equipment and machinery for each island needs to be identified first. The route shall consider the shortest possible route and wider roads as much as possible.</p> <p>2.4 Prior informed consent needs to be attained from police and Island Council on time and route of transport.</p> <p>2.5 Use properly licensed staff and supervisors when operating vehicles for transport.</p> <p>2.6 If closure of roads are required, advance notice of such road closures shall be informed to the to the public</p> <p>2.7 Traffic of the route of transport needs to be controlled and appropriate safe distances maintained in coordination with Island Council and the police.</p> <p>2.8 Levelling and resurfacing of roads both paved and unpaved to previous level to the satisfaction of the council.</p> <p>2.9 The contractor shall not in an ad-hoc manner open multiple areas for cable laying and follow a sequenced path along the agreed trail completing section by section as agreed.</p> <p>2.10 All digging and installation work should be completed in one go, if this task is not accomplished the area should be isolated using luminous safety tape and barricading structures surrounding the whole area.</p>				

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
2.11 Trenches should be progressively rehabilitated once work is completed. Material loading and unloading should be done in an area, well away from traffic and barricaded.				
<b>Risk/Impact 3: Health and Safety</b>				
<p>3.1 An Occupational Health and Safety Management Plan in accordance with labor management procedure, guidelines for occupation health and safety management of workers, communities, and visitors during construction works (Annex 12 of the ESMF), World Bank Group Environmental Health and Safety Guidelines and Good International Industry Practice (GIIP) and Maldives National Association for Construction Industry (MNACI) A guide to safety and health at construction sites, needs to be developed by the contractor and submitted for approval by PMU prior to commencement as per the requirement of bidding document.</p> <p>3.2 All provisions that are required under Health and Safety Regulations for Construction Industry and Employment Act (Annex 6) of the Maldives will be strictly adhered. Safe work method statements shall be prepared for all activities and job hazard assessments undertaken for high risk activities.</p>	Relevant	Relevant	Relevant especially when maintenance activities are undertaken	Relevant



Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
<p>3.3 List of workers to be utilized in relation to the project, with proof of employment will be required to be submitted to Project Management Unit (PMU) by the contractor. A valid work permit shall be provided for all workers employed for the project.</p> <p>3.4 Work can only commence once the following conditions are met:</p> <ul style="list-style-type: none"> <li>✓ pre-start training completed by all staff employed by the contractor/operator<sup>1</sup></li> <li>✓ All the required Personal Protective Equipment shall be provided by the contractor for all workers</li> <li>✓ Any newly employed party by the contractor/operator will be required to complete the pre-start training prior to commencing any physical work.</li> <li>✓ Refresher pre-start training to be undertaken on a routine basis.</li> </ul> <p>3.5 All workers shall be provided with Personal Protective Equipment (PPE) by the contractor/operator. In this regard the following need to be observed (check Annex 4):</p>				

<sup>1</sup> Training to be conducted in the native language of the workforce

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
<ul style="list-style-type: none"> <li>✓ Hard hats shall be used by all workers when undertaking construction and when undertaking inspections at heights and while working inside trenches for example.</li> <li>✓ Enclosed safety shoes shall be worn by all construction workers.</li> <li>✓ Safety harness shall be used by all workers when climbing heights.</li> <li>✓ Appropriately rated electrical protective gloves and protective clothing shall be provided to workers when dealing with electrical components.</li> <li>✓ Chemical protective gloves shall be provided to all workers when dealing with any chemicals.</li> <li>✓ Impact resistant safety goggles shall be worn by all construction workers.</li> <li>✓ Ear plugs shall be worn by all construction workers working in environments with high noise (working above 75 decibels).</li> <li>✓ Masks shall be worn when dealing with chemicals and when working in dusty environments.</li> </ul> <p>3.6 All chemicals shall be stored on an impervious hard surface and shall be covered.</p>				

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
<p>3.7 Adequate safety signs shall be installed at the work site giving clear direction. These shall be provided in local languages of the contractor staff in addition to English language.</p> <p>3.8 Construction work site will be demarcated &amp; fenced, and warning signs will be displayed both in English and Dhivehi.</p> <p>3.9 When construction is undertaken, clearly demarcated bins for waste disposal will be placed and emptied daily.</p> <p>3.10 Open pits will not be left for water to accumulate for a long time.</p> <p>3.11 Trench protection measures (shoring/shielding/sloping) approved by a certified civil engineer shall be employed to protect the workforce and the public from damage due to trench collapsing.</p> <p>3.12 Any stockpiled sand will be covered to prevent sand particles from being airborne.</p> <p>3.13 All vehicles and equipment used for the project will be operated by well trained personnel, holding a license to operate that equipment.</p> <p>3.14 When working at night, adequate lighting shall be provided.</p> <p>3.15 A designated toilet facility shall be available within 10 minutes of walking distance of the construction site.</p> <p>3.16 Breaks must be given to the workforce during mealtimes.</p> <p>3.17 The site will be cleaned daily following completion of days' work.\</p>				

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
<p>3.18 Standard Operating Procedures need to be developed and the staff shall be given appropriate training inclusive of health and safety requirements.</p> <p>3.19 If Covid19 restrictions are in place all guidelines issued by Health Protection Agency of Maldives need to be followed. Contractor work plans also need to include practices to maintain worker safety due to risk of Covid-19 infection. The Covid 19 guideline for construction work force is given in Annex 5 of the report. The contractor shall provide confirmation of following these guidelines prior to mobilization and provide the requested information in the guideline.</p>				
<b>Risk/Impact 4: Hazards including Fire Hazard</b>				
<p>4.1 All electrical applications should follow the guidelines provided in the bidding document and guidelines &amp; standards of Utility Regulatory Authority (URA).</p> <p>4.2 Effectively detect and issue alarms for fire events that may arise in Substations.</p> <p>4.3 The design of the system should ensure that optimal operational conditions are maintained such as temperature, humidity and dust as per the design specification given in the bidding document.</p>	Relevant	Relevant	Relevant	Not relevant

<b>Good Practices</b>	<b>Pre-Construction Phase</b>	<b>Construction Phase</b>	<b>Operation Phase</b>	<b>Decommissioning Phase</b>
<p>4.4 In order to avoid faulty installations, such as improper grounding, faulty wiring or mechanical damage stringent procedure for the Site Acceptance Test must be enforced to avoid catastrophic events due to the faulty installations.</p> <p>4.5 Minimize risk of electrical hazard, fire, or exposure of hazardous material during transport by ensuring that relevant standards highlighted in bidding document are met.</p>	Relevant	Relevant	Not Relevant	Not Relevant
<p>4.6 Routine maintenance shall be undertaken as per the equipment specification and as the maintenance plan of Utility.</p>	Not Relevant	Not Relevant	Relevant	Not Relevant
<p>4.7 Identify fire hazard risks and address such risks prior to undertaking decommissioning.</p>	Not Relevant	Not Relevant	Not Relevant	Relevant
<b>Risk/Impact 5: Noise</b>				
<p>5.1 Restricting work that generates significant noise (like concrete mixing) from morning 06 to evening 06.</p> <p>5.2 Effort needs to be made to finish work within the specified schedule.</p>	Not Relevant	Highly Relevant and Important	Highly Relevant and Important during maintenance works	Highly Relevant and Important

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
<b>Risk/Impact 6: Emissions and Air Quality</b>				
<p>6.1 Keeping construction equipment properly stored and secured at a location approved by the council.</p> <p>6.2 Materials that are stockpiled at the location for a long period of time shall be covered to minimize impact of dust generation due to windy conditions.</p> <p>6.3 Ensure that the work site is wetted regularly to minimize impact of dust as a result of the project.</p>	Not Relevant	Relevant	Not Relevant	Relevant
<p>6.4 Workers involved in concrete works shall wear dust masks and waterproof gloves, safety shoes and safety goggles.</p> <p>6.5 Concrete mixing shall be undertaken away from residential locations, in a location pre-approved by the island council.</p> <p>6.6 Where oil-based transformers are used, to avoid emissions from transformers, mitigations measures such as bunding and oil-water separators shall be applied to reduce the risk.</p>	Not Relevant	Relevant	Not Relevant	Not Relevant
<p>6.7 Use only vehicles with valid road worthiness certificate during construction.</p>	Not Relevant	Relevant	Relevant	Relevant

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
6.8 Routine maintenance shall be undertaken as per as per the equipment specification and as the maintenance plan of Utility.	Relevant	Not Relevant	Relevant	Not Relevant
<b>Risk/Impact 7: Ground water pollution and contamination</b>				
<p>7.1 Any chemicals, fuels, waste oil and hazardous waste shall be handled and transported carefully. All such chemicals and wastes shall be stored and transported in sealed containers. Such chemicals and wastes shall be stored in concrete hard or other impervious surfaces to prevent impacts through any leakages.</p> <p>7.2 Stored containers shall be regularly inspected to identify any leakages.</p> <p>7.3 The storage for any hazardous material and any refueling activities shall be undertaken outside the 20m Environmental Protection Zone (EPZ) of the island.</p> <p>7.4 Any hazardous material storage areas shall have firefighting equipment.</p> <p>7.5 All vehicle/machinery and equipment operation, maintenance and refueling will be carried out in such a way that spillage of fuels and lubricants does not contaminate the ground.</p>	Not Relevant	Relevant	Relevant	Relevant

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
7.6 All activities shall be undertaken in the presence of an experienced supervisor.				
<p>7.7 If dewatering is needed during construction phase permit needs to be attained through the Utility Regulatory Authority as per the provisions under dewatering regulations.</p> <p>7.8 If any households ground water supply is disrupted due to dewatering, portable water shall be supplied to the household by the contractor as per the provisions of the dewatering regulations.</p>	Not Relevant	Highly Relevant and Important	Maybe Relevant if it involved excavation for cable replacement	Maybe Relevant if it involved excavation for cable replacement
<b>Risk/Impact 8: Damage/Disruption to public and private property</b>				
<p>8.1 Provide information on the Grievance Redress Mechanism to the wider public prior to project commencement (see Annex 7 for a description of the GRM). Details of the GRM including persons to be contacted needs to be placed on boards at construction site, notice board of council and also Utility.</p> <p>8.2 Utilize wider roads when transporting construction material.</p> <p>8.3 Maintain safe distances approved by the project engineer when excavating nearby public houses.</p> <p>8.4 Use properly licensed staff when operating vehicles and machinery.</p>	Not Relevant	Relevant	Relevant especially when undertaking maintenance activities	Relevant



Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
<p>8.5 Where any excavation is undertaken close to any buildings install appropriate sloping/shoring/shielding mechanism approved by a certified civil engineer.</p> <p>8.6 If the cable laying activities and need for trenches disrupts access to private property the following shall be undertaken:</p> <ul style="list-style-type: none"> <li>• Where possible the Contractor shall prioritize the work that may block access and reinstate the trenches on one step to avoid the need for replacement of access.</li> <li>• The contractor will prior to commencing work inform the homes/businesses that will be affected and indicated the timeline of works. The contractor should inform the concerned houses prior to breaching access.</li> <li>• Any interruptions to house access should be temporarily restored using metal sheets/wood panels to provide safe access over any dug trenches.</li> </ul> <p>8.7 All existing utility line routes (water, sewerage, telephone, cable tv etc) should be accurately mapped prior to cable laying works to avoid damage to cables during excavation.</p> <p>8.8 Where any utility lines are damaged and disruption of service occurs, the contractor should bare the costs for service</p>				

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
restoration. The contractor should work with the respective utility to restore the service within shortest possible time frame, i.e. within a maximum of 24 hours.				
<b>Risk/Impact 9: Lack of proper labour management practices</b>				
<p>9.1 Develop a Code of Conduct for the workforce which shall be in line with the Labour Management Procedures (LMP) developed for the project. The practice shall cover aspects pertaining to health and safety of work force, employee grievances, prevention of harassment inclusive of sexual harassment and mitigatory measures to prevent social conflicts within the workforce and between the workforce and the community.</p> <p>9.2 The code of conduct shall become part of the workers contract and shall be legally binding.</p> <p>9.3 Briefing sessions on the code of conduct shall be undertaken for all workers prior to commencement of construction activities. This shall be undertaken in a language that is understandable to the workforce.</p>	Relevant	Relevant	Relevant especially when undertaking maintenance activities	Relevant
9.4 As per the labour management procedure (link: <a href="https://www.environment.gov.mv/v2/en/download/10026">https://www.environment.gov.mv/v2/en/download/10026</a> ) developed	Not Relevant	Relevant	Maybe Relevant during major	Relevant

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
<p>for the project and other best practices the following needs to be ensured:</p> <ul style="list-style-type: none"> <li>✓ All requirements under Employment Act, Prevention of Sexual Harassment Act and Gender Equity Act, Anti Trafficking Act (Annex 6) of the Maldives in relation to child labour, human trafficking, sexual harassment and exploitation needs to be adhered.</li> <li>✓ No workers under the age of 18 shall be employed for the purpose of the project.</li> <li>✓ Valid work visas and work permits shall be obtained for all the workers employed for the project.</li> <li>✓ Valid identification documents shall be used by the contractor to confirm the age of all hired employees for the project.</li> <li>✓ A valid work contract shall exist between each employee and employer. The contract shall be in a language understandable to the workforce and shall have provisions specifying that the work contract is agreed willingly without duress.</li> <li>✓ Suppliers that have been blacklisted in any country and/or by any multilateral bank to issues pertaining to child labor,</li> </ul>			<p>maintenance works</p>	

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
<p>human trafficking and health and safety issues shall not be part of the supply chain of the project.</p> <ul style="list-style-type: none"> <li>✓ Awareness programs on sexually transmitted diseases shall be conducted for all the workers engaged in construction activities.</li> <li>✓ Use of any type of alcohol and drugs are prohibited by law in inhabited islands of the Maldives and hence this needs to be briefed to the work force and shall be strictly enforced within the workforce.</li> <li>✓ The labour force needs to be made aware of the contractor’s grievance redress mechanism procedures (Annex 7). The mechanism shall ensure confidentiality and fairness.</li> <li>✓ An internal transparent, confidential and accountable system shall be in place to report and address issues pertaining to sexual harassment.</li> <li>✓ Grievance redress mechanism information (Annex 7) needs to be displayed in construction site/s in a language understandable to project workforce.</li> <li>✓ Constant and reliable electricity supply shall be available at project office and accommodation site.</li> </ul>				

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
<ul style="list-style-type: none"> <li>✓ Shower and toilet facilities shall be available at temporary accommodation site.</li> <li>✓ Toilet and drainage shall be connected to local sewer system, where not available septic tanks shall be used for treatment prior to disposal.</li> <li>✓ A minimum ratio of 01 toilet/shower per 20 workers shall be maintained. Separate facilities shall be provided for men and women.</li> <li>✓ Individual bedding shall be provided to all workers.</li> <li>✓ Storage space for individual belongings shall be provided for all workers.</li> <li>✓ Male and Female workforce shall be housed separately.</li> <li>✓ Designated locations for waste disposal with clearly marked bins shall be established. Bins shall be emptied daily.</li> <li>✓ Sufficient lighting and cooling systems shall be established.</li> <li>✓ Portable drinking water shall be provided.</li> <li>✓ The site shall be cleaned daily.</li> <li>✓ Monthly inspections to determine pest infestation of the site shall be undertaken.</li> </ul>				

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
✓ Meals if prepared from a local café or restaurant shall be from a Maldives Food and Drug Authority certified facility.				
<b>Risk/Impact 10: In appropriate waste management practices</b>				
<p>10.1 Designated locations for waste disposal with clearly marked bins needs be established both at all project sites including any temporary accommodation sites for construction workforce.</p> <p>10.2 All waste oil needs to be stored in sealed barrels on an impervious surface.</p> <p>10.3 Day to day solid waste generated by construction/maintenance/operational workforce needs to be managed through the island waste management stream.</p> <p>10.4 Workforce needs to be briefed on the procedure to follow in terms of waste management.</p>	Not Relevant	Relevant	Relevant	Relevant
<p>10.5 All construction waste shall be either reused by the community (as per guidance of the council) or needs to be transferred to Thilafushi for disposal at the end of construction period.</p> <p>10.6 Construction wastes should be removed from public areas like roads and road side within 24 hours to ensure public safety.</p>	Not Relevant	Relevant	Not Relevant	Relevant

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
<p>10.7 During maintenance period the utility (operator) will be required to dispose any waste generated. Any electrical/hazardous waste generated should be transferred to a facility designed to accept and process such waste.</p> <p>10.8 Where any hazardous waste is to be shipped to a facility outside the country, the Utility needs to adhere to all requirements under Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal and need to take appropriate approvals from Environmental Protection Agency (EPA) Maldives.</p> <p>10.9 All requirements under waste management regulation of the Maldives needs to be adhered (Annex 6).</p>	Not Relevant	Not Relevant	Relevant	Not Relevant
<b>Risk/Impact 11: Social Conflicts with Community</b>				
11.1 The labour force needs to be briefed on the language, culture and customs of the Maldives, if foreign labour is to be used.	Not Relevant	Relevant	Relevant mostly when undertaking major maintenance works	Relevant

Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
11.2 Public needs to be made aware of the grievance redress mechanism of the project. Notices including contact numbers need to be placed on the project site, council and utility notice boards.	Relevant	Relevant	Relevant	Relevant
<b>Risk/Impact 12: Gender Based Violence</b>				
<p>12.1 Appropriate Grievance Redress Mechanism (GRM) needs to be established for project workforce (Annex 7) and the information shall be given to the project workforce on the available procedure.</p> <p>12.2 The wider public needs to be made aware of the Grievance Redress Mechanism (Annex 7) available to the public. Notices including contact numbers need to be placed on the project site, council and Utility notice boards.</p> <p>12.3 An internal transparent, confidential and accountable system will be established within the company<sup>2</sup> to tackle issues of sexual harassment, physical and psychological harassment and workplace bullying.<sup>3</sup></p>	Relevant	Relevant	Relevant	Relevant

<sup>2</sup> Mechanisms such as establishment of gender desks to report such issues can be practiced.

<sup>3</sup> Utility is currently finalizing harassment policies for the company, already a harassment committee has been established and grievances could be reported anonymously. For the contractors the contractors are required to submit code of conduct for workers



Good Practices	Pre-Construction Phase	Construction Phase	Operation Phase	Decommissioning Phase
<b>Risk/Impact 13: Flooding and water accumulation</b>				
<p>13.1 No potholes shall be left on construction site where water accumulates.</p> <p>13.2 No empty containers shall be left in the open for water to accumulate.</p> <p>13.3 Following completion of construction any areas used for construction, storage or accommodation shall be backfilled and levelled to preexisting levels.</p> <p>13.4 Qualified supervisors shall be assigned to monitor all construction activities.</p>	Not Relevant	Relevant	Maybe Relevant during major Maintenance Activities	Relevant
13.5 The foundation of the transformer house shall be raised to minimize impacts of flooding.	Relevant	Relevant	Not Relevant	Not Relevant

## 4. Monitoring

### 4.1 Project Monitoring Requirements

Monitoring is a key requirement to ensure that the impacts envisaged are appropriately mitigated through the code of practice that is to be followed. It also helps to identify additional requirements where the proposed mitigation options are not working. In addition, it helps to keep records of the compliance status of the various aspects that needs to be followed and hence provides a check and balance during project implementation.

The monitoring program is defined for construction, operation and decommissioning phase of the project. The primary responsible parties for monitoring, frequency of monitoring and the cost of monitoring are highlighted for each phase of the project. The format for commitment letter to undertake monitoring during construction phase and operational phase is given in Annex 3 of this report. For the construction phase the letter needs to be signed by the selected contractor, and for operational phase by the Utility. The Table below (Table 5) summarizes key indicators for monitoring, source of information, frequency of monitoring, responsible parties and reporting mechanism.

*Table 5 Monitoring Requirements for preconstruction, construction, operation and decommissioning phase*

<b>Key Indicators for Monitoring</b>	<b>Source of information for monitoring</b>	<b>Frequency of monitoring</b>	<b>Responsibility</b>	<b>Reporting</b>
<b>1. Preconstruction Phase</b>				
Work Permit of construction work force inclusive of copy of valid identification documents (Eg: passport)	Work Permit Records by Contractor	One off prior to construction commencement and if any additional work force is required during project implementation	Contractor	Contractor report to PMU  PMU to report to WB/AIIB through quarterly report

<b>Key Indicators for Monitoring</b>	<b>Source of information for monitoring</b>	<b>Frequency of monitoring</b>	<b>Responsibility</b>	<b>Reporting</b>
Health and Safety Equipment	Provide records of health and safety equipment acquired by contractor	One off prior to commencement of construction and periodically	Contractor	Contractor to report to PMU PMU to report to WB/AIIB through quarterly report
Code of Conduct for construction workforce	Contractor	One off prior to commencement of construction	Contractor	Contractor to share with PMU  PMU to share with WB/AIIB
Log records of preconstruction awareness/training activities undertaken for the workforce. Including but not limited to awareness on health and safety, code of conduct and venerable diseases	Contractor	One off prior to commencement of construction and periodically thereafter, especially if/when new labour force is hired.	Contractor	Contractor to share with PMU  PMU to share with WB/AIIB
Conditions embedded in the	Contractor	One off prior to commencement of construction	Contractor	Contractor to share with PMU

<b>Key Indicators for Monitoring</b>	<b>Source of information for monitoring</b>	<b>Frequency of monitoring</b>	<b>Responsibility</b>	<b>Reporting</b>
works contract of the work force				PMU to share with WB/AIIB
Details of any suppliers used for the contract	Contractor	One off prior to commencement of construction	Contractor	Contractor to share with PMU  PMU to share with WB/AIIB
<b>2. Construction Phase</b>				
No. grievances reported and resolved	Grievance registry	Contractor/HDC/Utility/Ministry to update the grievance records google sheet immediately  To be included in Monthly reports provided by contractor	Contractor, Council, Utility, Ministry (Check Annex 7)	Contractor to provide to PMU  PMU to report to WB/AIIB through quarterly report
Toolkit trainings conducted	Contractor training records	Monthly	Contractor	Contractor to provide to PMU  PMU to report to WB/AIIB through quarterly report

<b>Key Indicators for Monitoring</b>	<b>Source of information for monitoring</b>	<b>Frequency of monitoring</b>	<b>Responsibility</b>	<b>Reporting</b>
Log records of vegetation removed	Contractor Records	Monthly	Contractor	Contractor to provide to PMU  PMU to report to WB/AIIB through quarterly report
Implementation of construction phase mitigation measures	Health and Safety Supervisor checklist	Bi-weekly	Contractor	Contractor to report to PMU  PMU to report to WB/AIIB through quarterly report
Log records of waste disposal	Contractor records	Monthly	Contractor	Contractor to provide to PMU  PMU to report to WB/AIIB through quarterly report
Incident Reports	Contractor records	Contractor to update the incident report google sheet immediately  To be included in Monthly reports	Contractor	Contractor to provide to PMU  PMU to report to WB/AIIB through quarterly report

Key Indicators for Monitoring	Source of information for monitoring	Frequency of monitoring	Responsibility	Reporting
		provided by contractor		
<b>3. Operation Phase</b>				
Log Records of Maintenance Activities undertaken	Maintenance records by Utility	Quarterly during project implementation period yearly thereafter	Utility	During project period.  Utility to provide to Ministry  Ministry to provide to WB/AIIB
Records of health and safety equipment at each project site	Utility records	Quarterly during project implementation period yearly thereafter	Utility	During project period.  Utility to provide to Ministry  Ministry to provide to WB/AIIB
Maintenance trainings given to operational staff	Training Records of Utility	Quarterly during project implementation	Utility	During project period.

Key Indicators for Monitoring	Source of information for monitoring	Frequency of monitoring	Responsibility	Reporting
		period yearly thereafter		Utility to provide to Ministry Ministry to provide to WB/AIIB
Log records of grievances received	Utility records	Quarterly during project implementation period yearly thereafter	Utility/Ministry	During project period.  Utility to provide to Ministry  Ministry to provide to WB/AIIB
Implementation of operation phase mitigation measures	Utility	Quarterly during project implementation period yearly thereafter	Utility	During project period.  Utility to provide to Ministry  Ministry to provide to WB/AIIB

<b>Key Indicators for Monitoring</b>	<b>Source of information for monitoring</b>	<b>Frequency of monitoring</b>	<b>Responsibility</b>	<b>Reporting</b>
Incident Reports	Utility records/maintenance contractor	Quarterly during project implementation period yearly thereafter	Utility	During project period.  Utility to provide to Ministry  Ministry to provide to WB/AIIB
Work Permit of any foreign workers force used for maintenance during operational phase inclusive of copy of valid identification documents (Eg: passport)	Work Permit Records by Maintenance contractor	Prior to mobilization of any foreign maintenance workforce	Utility	During project period.  Utility/Maintenance contractor to provide to Ministry  Ministry to provide to WB/AIIB
<b>4. Decommissioning Phase</b>				
Implementation of decommissioning	Utility	Monthly	Utility	Utility to provide details to Ministry.



<b>Key Indicators for Monitoring</b>	<b>Source of information for monitoring</b>	<b>Frequency of monitoring</b>	<b>Responsibility</b>	<b>Reporting</b>
phase mitigation measures				
Work Permit of decommissioning workforce inclusive of copy of valid identification documents (Eg: passport)	Records of Decommissioning contractor hired by utility	One off prior to commencement of decommissioning and if any additional work force is required during project implementation	Utility	Utility to provide details to Ministry.
Code of Conduct for decommissioning workforce	Code of conduct of Decommissioning contractor hired by utility	One off prior to commencement of construction	Utility	Utility to provide details to Ministry.
Log records of premobilization awareness/training activities undertaken for the workforce. Including but not limited to awareness on health and safety, code of conduct and venerable diseases	Records of Decommissioning contractor hired by utility	One off prior to commencement of decommissioning and periodically thereafter, especially if/when new labour force is hired.	Utility	Utility to provide details to Ministry.

<b>Key Indicators for Monitoring</b>	<b>Source of information for monitoring</b>	<b>Frequency of monitoring</b>	<b>Responsibility</b>	<b>Reporting</b>
Incident report	Records of Decommissioning contractor hired by utility	Monthly	Utility	Utility to provide details to Ministry.
Toolkit trainings conducted	Decommissioning Contractor training records	Monthly	Utility	Utility to provide details to Ministry.
Health and Safety Equipment	Provide records of health and safety equipment acquired by decommissioning contractor	One off prior to mobilization and periodically	Utility	Utility to provide details to Ministry.

#### 4.2 Monitoring Report Format and Schedule

Monitoring reports shall be compiled on a quarterly basis during construction phase and on a yearly basis thereafter. The construction phase monitoring will be a responsibility of the Contractor and PMU and for the operational phase monitoring will be a responsibility of Utility. The monitoring report shall cover the following aspects.

1. Introduction and Background
2. Key Aspects monitored as per the monitoring program
3. Status of Mitigation Measures implemented
4. Achievements and gaps
5. Recommended Changes if any

## 5. Conclusion

The report outlines code of good practice to follow during construction, operation, and decommissioning phase of the project to undertake grid upgrading activities to facilitate PV installation and incorporation BESS through the through ARISE project. The system will overall become an important part of the hybrid solar energy system that is to be developed through the project. Overall it was found that the project will have net positive impacts. In this regard some of the positive impacts identified include, positive environmental impacts due to reduction in emissions, savings on diesel, increased reliability of electricity provided in these islands and creation of job opportunities in these islands especially more opportunities for women. Considering the scope of the project the risks are expected to be minimal. Most of the risks are associated with health and safety. Usually contractors in the Maldives lag behind this aspect, hence special emphasis should be made to ensure health and safety of both the workforce and the public are ensured by practicing the guidance given in this document. The contractor is required to develop a code of conduct for workforce as per the Labour Management Procedures (LMP) developed for the project. A Grievance Redress Mechanism has been defined for the public and also to the construction workforce, hence any concerns that may arise during project implementation could be addressed swiftly.

In terms of monitoring, the main aspects to monitor will be the monitoring compliance to the code of practice and log records need to be kept for such aspects like vegetation removed, waste generated, awareness and training activities undertaken and grievances received. Overall the impacts are likely to be minimal as long as the proper safety measures are followed, appropriate training is given the contractor staff and operational staff and appropriate maintenance activities are undertaken.

## References

Government of Maldives (2019). *Strategic Action Plan 2019-2023*. Retrieved from: [Strategic Action Plan 2019-2023 - The President's Office \(presidency.gov.mv\)](#)

Jalava, K., Kuitunen, M. T., Ijäs, A. (2009). Developing the RIAM method (rapid impact assessment matrix) in the context of impact significance assessment. *Environmental Impact Assessment Review*, 30 (2), 82-89. <https://doi.org/10.1016/j.eiar.2009.05.009>.

Ministry of Environment, Climate Change and Technology (2020a). *Environmental and Social Management Framework: Accelerating Renewable Energy Integration and Sustainable Energy (ARISE)*. MECT. Retrieved from: [ESMF ARISE \(environment.gov.mv\)](#).

Ministry of Environment, Climate Change and Technology (2020b). *Stakeholder Engagement Plan: Accelerating Renewable Energy Integration and Sustainable Energy (ARISE)*. MECT. Retrieved from: [Stakeholder Engagement Plan: Accelerating Renewable Energy Integration and Sustainable Energy \(ARISE\) Project \(P172788\) \(environment.gov.mv\)](#).

Ministry of Environment, Climate Change and Technology (2020c). *Labour Management Procedure: Accelerating Renewable Energy Integration and Sustainable Energy (ARISE)*. MECT. Retrieved from: [Labour Management Procedures: Accelerating Renewable Energy Integration and Sustainable Energy \(ARISE\) Project \(P172788\) \(environment.gov.mv\)](#).

United Nations Framework Convention on Climate Change (2020). *Climate Ambition Summit Builds Momentum for COP26*. Retrieved from: [Climate Ambition Summit Builds Momentum for COP26 | UNFCCC](#)

## Annex -1 Project Estimate Schedule

Activities	Date	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4												
		J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
<b>3.1 Grid Modernization Ph-1: [Addu, Fuvamulah, Thinadhoo, Eydhafushi, khulhudhufushi, Hinnavaru]</b>																									
Preparation of Technical Requirement	28-Oct-21																								
Draft Bidding Document Clearance	23-Dec-21																								
Issue Bidding Document (Bidding Period)	6-Jan-22																								
Proposal Submission / Opening / Minutes	31-Mar-22																								
Bid Evaluation Report	9-Jun-22																								
Recommendation for Award	30-Jun-22																								
Signed Contract	28-Jul-22																								
Completion Date	19-Oct-23																								
<b>3.2 Grid Modernization Phase-2: [Laamu Atoll, Dh. Kudahuvadho, GA. Villingili, Lh. Naifaru, Sh. Funadhoo]</b>																									
Preparation of Technical Requirement	18-Nov-21																								
Draft Bidding Document Clearance	23-Dec-21																								
Issue Bidding Document (Bidding Period)	6-Jan-22																								
Proposal Submission / Opening / Minutes	31-Mar-22																								
Bid Evaluation Report	26-May-22																								
Recommendation for Award	16-Jun-22																								
Signed Contract	14-Jul-22																								
Completion Date	9-Nov-23																								

## Annex 2: Impact/Risk Assessment Method

### Method of Impact/Risk Prediction

Construction and operational phase impacts of the project were determined based on previous experience of similar projects and field observations. Rapid Impact Assessment Matrix (RIAM) method was utilized to determine the magnitude and significance of the impacts.

Potential environmental and social risks and impacts	Construction Phase	Operation Phase	Decommissioning Phase
A	H	H	M
B	L	L	L
C	M	H	L

RIAM works by assigning specific criteria for all impact assessments and by scaling these criteria (Jalava, Kuitunen and Ijäs 2010). The system is suitable to identify both positive and negative impacts. There are two groups defined under the assessment criteria:

- (A) Criteria that values the importance of the condition
- (B) Criteria that values the situation

The A CRITERION A is subdivided into the following two aspects.

**A1: Importance of the Condition:** Defined by the spatial boundaries that it affects. The scales of these criteria include the following:

- 4= important to national/international Interests
- 3= important to regional/ national interests
- 2= important to areas immediately outside the local condition

1= important only to local condition

0= no importance

**A2: Magnitude of Impact:** Determines the positive and negative change of an aspect. The scales of these criteria include the following:

+3= major positive impact

+2= significant improvement from status quo

+1= improvement from status quo

0= no change from status quo

-1= negative change to status quo

-2= significant negative impact or change

-3= major negative impact or change

Criteria B can be subdivided into the following three aspects

**B1: Permanence:** This determines whether the condition is temporary or permanent.

1= No Change not applicable

2= Temporary

3= Permanent

**B2: Reversibility:** This determines the reversibility of the change

1= No change/ Not applicable

2= Reversible

3= Not Reversible

**B3: Cumulative:** Determines whether the impact is singular or whether there will be additional cumulative effects as a result of the change

1= No change/ Not applicable

2= Singular

3= Cumulative

The following components were investigated through RIAM both for construction and operational phase:

### **1. Physical/Chemical**

Noise

Emissions

Air Quality

Flooding

Ground Water

### **4 Biological/Ecological**

Terrestrial Flora and Fauna

Marine Flora and Fauna

### **Socioeconomic**

Health/Safety

Transport

Fire Hazard

Damage to Property

Gender Based Violence

Gender Gap

Labour and working Conditions

Employment and Training

Reliability of Utility Service



A score for each component was determined based on the following formulae

$$(A1) \times (A2) = (AT)$$

$$(B1) + (B2) + (B3) = (BT)$$

$$\text{Total Component Score} = (BT) \times (AT)$$

Based on the total scores impacts can be categorized as highlighted below:

*Table 3 RIAM scoring description*

<b>RIAM Environmental Score (ES)</b>	<b>Range Value (Alphabetic)</b>	<b>Range Value (Numeric)</b>	<b>Description (type of Impact or Change)</b>
108 to 72	E	5	Major positive
71 to 36	D	4	Significant positive
35 to 19	C	3	Moderate positive
10 to 18	B	2	Positive
1 to 9	A	1	Slight Positive
0	N	0	No change
-1 to -9	-A	-1	Slight negative
-10 to -18	-B	-2	Negative
-19 to -35	-C	-3	Moderate negative
-36 to -71	-D	-4	Significant negative
-72 to -108	-E	-5	Major negative

### **Uncertainties of impact prediction**

There is no robust accurate methodology to predict risks or impacts. The accuracy of predicted impacts increases with experience and through information attained from post project monitoring data of similar projects. However, in the Maldives post project monitoring is one of the weakest implemented stage of the impact assessment process. Thus, this data is often not available when predicting impacts.

Nevertheless, the methodology adopted for impact predict impacts is very robust and hence can determine impacts to a fairly certain level.

## Identification of Impacts/Risks

The table-4 provides the impact scoring that was given to the various categories for construction, operation and decommissioning phase of the project.

Table 4 Impact scoring matrix table

Category	A1	A2	B1	B2	B3	Total Score	Range Value (Alphabetic)	Range Value (Numeric)
<b>(a) Construction Phase</b>								
<b>1. Physical/Chemical</b>								
Noise	1	-2	2	2	3	-14	-B	-2
Emissions & Air Quality	1	-2	2	2	3	-7	-A	-1
Flooding/Water Accumulation	1	-2	2	2	2	-12	-B	-2
Ground Water	1	-2	2	2	3	-14	-B	-2
Waste	3	-1	2	2	2	-6	-A	-1
<b>2. Biological/Ecological</b>								
Terrestrial Flora and Fauna	1	-1	3	3	3	-9	-A	-1
Marine Flora and Fauna	1	0	1	1	1	0	N	0
<b>3. Socioeconomic</b>								
Health/Safety	2	-2	2	3	3	-32	-C	-3
Transport	2	-1	2	2	2	-12	-B	-2
Fire Hazard	1	-1	2	3	2	-7	-A	-1
Damage to Property	1	-1	2	2	2	-6	-A	-1
Gender Based Violence	1	-2	2	3	3	-14	-B	-2
Gender Gap	1	0	1	1	1	0	N	0

<b>Labour and Working Condition</b>	1	-2	2	2	2	-12	-B	-2
<b>Employment &amp; Training</b>	2	+2	3	3	3	+36	+D	+4
<b>Economy</b>	2	+2	3	3	3	+36	+D	+4
<b>Utility Service Reliability</b>	1	0	1	1	1	0	N	0
<b>(b) Operational/Maintenance Phase</b>								
<b>1. Physical and Chemical</b>								
<b>Noise</b>	1	0	1	1	1	0	N	0
<b>Emissions</b>	1	0	1	1	1	0	N	0
<b>Air Quality</b>	1	0	1	1	1	0	N	0
<b>Flooding</b>	1	-1	2	2	3	-7	-A	-1
<b>Ground Water</b>	1	-1	2	2	3	-7	-A	-1
<b>Waste</b>	1	-1	2	2	3	-7	-A	-1
<b>2. Biological/Ecological</b>								
<b>Terrestrial Flora and Fauna</b>	1	0	1	1	1	0	N	0
<b>Marine Flora and Fauna</b>	1	0	1	1	1	0	N	0
<b>3. Socioeconomic</b>								
<b>Health/Safety</b>	2	-2	2	3	3	-32	-C	-3
<b>Transport</b>	1	0	1	1	1	0	N	0
<b>Fire Hazard</b>	2	-1	2	3	2	-14	-B	-2
<b>Damage to Property</b>	1	0	1	1	1	0	N	0
<b>Gender Based Violence</b>	1	-2	2	3	3	-14	-B	-2
<b>Gender Gap</b>	2	3	3	3	2	+48	+D	+4
<b>Labour and Working Condition</b>	1	0	1	1	1	0	N	0
<b>Employment &amp; Training</b>	2	+3	3	3	3	+54	+D	+4
<b>Economy</b>	2	+3	3	3	3	+54	+D	+4
<b>Utility Service Reliability</b>	2	+3	3	3	3	+54	+D	+4

<b>(c) Decommissioning Phase</b>								
<b>1. Physical and Chemical</b>								
<b>Noise</b>	1	-2	2	2	3	-14	-B	-2
<b>Emissions &amp; Air Quality</b>	1	-1	2	2	3	-7	-A	-1
<b>Flooding/Water accumulation</b>	1	-2	2	2	2	-12	-B	-2
<b>Ground Water</b>	1	-2	2	2	2	-12	-B	-2
<b>Waste</b>	2	-1	3	2	2	-14	-B	-2
<b>2. Biological/Ecology</b>								
<b>Terrestrial Fauna and Flora</b>	1	-1	2	2	2	-6	-A	-1
<b>Marine Fauna and Flora</b>	1	0	1	1	1	0	N	0
<b>3. Socioeconomic</b>								
<b>Healthy/Safety</b>	2	-2	2	3	3	-32	-C	-3
<b>Transport</b>	2	-1	2	2	2	-12	-B	-2
<b>Fire Hazard</b>	1	-1	2	3	2	-7	-A	-1
<b>Damage to Property</b>	1	-1	2	2	2	-6	-A	-1
<b>Gender Based Violence</b>	1	-2	2	3	3	-14	-B	-2
<b>Gender Gap</b>	1	0	1	1	1	0	N	0
<b>Labour and Working Condition</b>	1	-2	2	2	2	-12	-B	-2
<b>Employment &amp; Training</b>	1	0	1	1	1	0	N	0
<b>Economy</b>	1	0	1	1	1	0	N	0
<b>Utility Service Reliability</b>	1	0	1	1	1	0	N	0

## Annex 3: Mitigation & Monitoring Commitment Letter format for Contractor and Utility

### **Contractor**

Date:

To Whom it may Concern,

As the contractor for the project for Installation of Battery Energy Storage System (BESS) in the following islands (insert names of islands here) we hereby provide commitment to implement the project as per the good practices highlighted in Chapter 3 and to implement the monitoring plan as per Chapter 4 of Environmental and Social Code of Practice for Battery Energy Storage System (BESS) installation under ARISE project for the construction phase. We hereby commit to bear all the costs to implement these measures.

(Signature)

(Name)

(Designation)

### **Utility**

Date:

To: Whom it may Concern,

As the operator for the project for Installation of Battery Energy Storage System (BESS) in the following islands (insert names of islands here) we hereby provide commitment to implement the project as per the good practices highlighted in Chapter 3 and to implement the monitoring plan as per Chapter 4 of Environmental and Social Code of Practice for Battery Energy Storage System (BESS) installation under ARISE project for the operation/maintenance and decommissioning phase. We hereby commit to bear all the costs required to implement these measures.

(Signature)

(Name)

(Designation)

## Annex 4: Health and Safety Requirements

### ➤ Personal Protective Equipment



Above highlighted equipment should be utilised by the construction workforce during the construction phase. Moreover, any visitors to site should be provided with hard hats and safety eye wear and reflective vests.

## ➤ Safety Signs at Construction Site

1. The following safety signs should be at the construction site at all times



**No admittance  
for unauthorised  
personnel**



**Safety helmets  
are provided for  
your safety and  
must be worn**



**High visibility  
jackets  
must be worn**



**Protective  
footwear  
must be worn**



**Wear gloves**



**Eye protection  
must be worn**



**Children must not  
play on this site**







**Construction work in progress  
Parents are advised to warn  
children of the dangers of  
entering this site**

2. Where noisy operations (above 85 decibels) are underway the following signs should be there



**Wear ear  
protectors**

3. Where working in heights above 20 feet the following sign should be placed



**Wear  
safety  
harness**

4. Where any overhead loads are carried the following should be placed in the road



5. Where any excavation is carried out the following should be placed



6. Where any electrical wiring works are undertaken the following sign should be placed



7. The following should be placed in any areas where chemicals are stored



8. Where any welding activities are undertaken the following sign should be placed



9. Any hazardous material should be labelled as below and the following sign should be placed in any storage areas of hazardous chemicals



10. When closing roads temporarily to construction traffic the following signs should be placed





11. Covid 19 Related Safety Signs. The following must be placed in construction site and staff accommodation blocks.



**Maintain  
social  
distance**



**Wash hands  
regularly**



**Do not come on to site  
if you think you have  
coronavirus or someone  
in your household  
is self-isolating**



**Disinfect ALL  
surfaces  
regularly**



**Minimize  
face to face  
contact**



**Keep windows open  
for ventilation**



**Wear face  
mask**

## Annex 5: Covid 19 Guideline

### **Guidance Note: ESCP Requirements & COVID19 Special Consideration in Civil Works Contracts**

Contractor: (insert name here)

This guidance note includes measures to safeguard the health and safety of the construction workers in response to COVID19 pandemic and their families, people living at or close to the project site, as well as the general public, and includes reporting templates for the implementation of mitigation measures reflected in the ESCP for the proposed project. The paper is prepared by referring to the national and the World's Bank's requirements.

The contractor must ensure that the mitigation measures proposed in this paper are fully implemented and the PMU shall closely monitor the project activities to ensure that the contractor adheres to these requirements.

In addition to this guideline the contractor must follow the covid 19 safety guideline issued by Maldives National Association for Construction Industry (MNACI) link: [Maldives National Association of Construction Industry - Downloads - Construction Safety Guide \(mnaci.org.mv\)](https://mnaci.org.mv/Downloads/Construction%20Safety%20Guide)

### **1. Preconstruction / Preparatory Phase**

#### **1.1. ACTIONS NEEDED PRIOR TO MOBILIZATION**

The contractor must take all precautionary measures to ensure that the workers are not at risk or doesn't not carry the risk of infection. As such, the contractor must provide all necessary details related to the project team by using the spread sheet presented in **Annex a** and submit to the PMU along with the signed declaration presented in **Annex b**. If expatriate workers are included in the project team, copies of their work permit shall be submitted.

The project team shall not include:

- A worker that falls in the high-risk category for COVID19; aged 65 and above, under long term medication or having chronic disease. If high risk staff are included, they are required to be vaccinated.
- A worker that has made contact with a COVID19 positive case.
- A resident of a house put under monitoring or quarantine.
- An illegal immigrant.

Refer to the latest update sheet from the following link for the list of places under monitoring or quarantine.

<https://covid19.health.gov.mv/downloads/>

The contractor shall identify an Environmental and Social focal point to ensure that the mitigation measures presented in the ESCP are being properly implemented and to enforce COVID-19 preventive measures. The focal point can be a work supervisor or a health and safety specialist. This person is responsible for coordinating preparation of the site and making sure that the measures taken are communicated to the workers, those entering the site and the island community. It is also advisable to designate at least one back-up person; in case the focal point becomes ill; that person shall be aware of the arrangements that are in place. A health and safety briefing shall be provided to the workers prior to mobilization. In addition to this, it is recommended to assign a specific staff to assume cleaning duties.

Furthermore, if the project involves mobilization of a team or a member from an island under COVID19 monitoring to the project island, travel permit from HEOC must be attained (with a negative PCR test) and the PMU notified accordingly.

The contractor must ensure that the project team is fully equipped and geared to take preventive measures against the potential spread of COVID19 and must travel with and carry sufficient quantities of all the required PPEs and cleaning items. Some of such items are listed below:

- Thermometer
- First-aid kit
- General flu medicine
- Masks
- Gloves
- Foot operated lidded dustbins
- Dustbin bags
- Disinfecting liquid such as bleach
- Cleaning equipment (broom, mop etc.)
- Hand sanitizers
- Soap

The contractor is required to submit a full list of such health and safety related items and their respective quantities by using the spread sheet provided in **Annex c**.

**The information presented in this section must be provided to the PMU prior to mobilization.**

## **1.2. MOBILIZATION AND SETTING UP WORK SITE AND ACCOMMODATION**

*The following guidance shall be taken into account when setting up the labor camp:*

- *Social distancing norms must be facilitated. Each bed must be separated by a distance of at least 3 to 6 feet.*
- *The accommodation facility must be properly ventilated. It is advisable to keep the windows open.*
- *A foot operated lidded bin is recommended to be kept at or just outside the accommodation to collect general waste generated by the workers. Foot operated lidded bins shall also be kept at the work site and at the kitchen and dining area to collect general waste.*



- *Hand sanitizers are to be kept at entrance point to the accommodation (wall mounted or kept on top of a table) as well as inside the accommodation facility preferably at each bed side.*
- Establish handwashing facilities at the work site and eating or resting areas. Hand Sanitizers can be used as an alternative.
- Ensure handwashing facilities supplied with soap, disposable paper towels and closed waste bins exist at toilets, kitchen and dining area. Alcohol based sanitizer (if available, 60-95%alcohol) can also be used.
- Place posters and signs around the site, with images and text in workers' local languages providing guidance on signs and symptoms of COVID-19, how it is spread, how to protect themselves (including regular handwashing and social distancing) and what to do if they or other people have symptoms. Examples of WASH guidance from the WHO and important contact numbers are provided in **Annex d and e**.
- The contractor is advised to utilize fully vaccinated personal for construction as much as practically possible.

## 2. CONSTRUCTION PHASE

### 2.1. CHECKS ON COMMENCEMENT OF WORK

Entry/exit to the work site shall be controlled and documented. The following actions are recommended:

- The movement of the workers shall be restricted from the labor camp to the work site and from the work site to the labor camp.
- The workers shall avoid contact with the general public of the project island.
- Daily temperature checks shall be taken and recorded prior to leaving the labor camp and entering the work site. Logs shall be maintained and attached to the monthly Health and Safety report.
- Provide daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures, using demonstrations and participatory methods.
- During the daily briefings, remind workers to self-monitor for possible symptoms (fever, cough) and to report to the supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell.
- If there is any symptom of COVID19 (fever, cough), the staff must be immediately isolated, referred to the health center and the concerned authorities must be notified. This staff shall not be involved in the project team until cleared by the respective authorities.
- Any other staff who have had close contact with the staff who developed symptoms must be self-quarantined for 14 days and shall not be allowed to enter the project site or move about in the project island, even if there are no symptoms. The directions given by the authorities shall be strictly followed.

### 2.2. CLEANING AND WASTE DISPOSAL

- The tools and equipment used by the workers must be cleaned when changing shifts.
- Cleaning staff shall use appropriate PPEs such as masks and gloves.
- The labor camp must be cleaned frequently (at least once a day) including accommodation facility, kitchen, dining area and toilets. The floor, walls and door knobs shall be properly cleaned using 1:9 bleach solution. Sheets and linings must be changed at least weekly.
- Any waste produced during the care of ill workers shall be collected separately in designated containers or bags and treated and disposed of according to the SOPs of HPA and WHO. This includes placing double bags inside the bins, properly tying and removing the bags when 2/3 are full and disinfected by spraying with 1:9 bleach solution.

### **2.3. ADJUSTING WORK PRACTICES**

*Consider changes to work processes and timings to reduce or minimize contact between workers, recognizing that this is likely to impact the project schedule. Such measures could include:*

- *Changing to a 24-hour work rotation.*
- *Adapting or redesigning work processes for specific work activities and tasks to enable social distancing, and training workers on these processes.*
- *Consider changing canteen layouts and phasing meal times to allow for social distancing.*
- *Consider using of dust masks in addition to the general construction PPEs.*

## **3. MONITORING PLAN**

*Health and Safety Monitoring Report containing details and photographic evidence of mitigation measures undertaken in response to the COVID19 situation must be prepared according to the format given in the Annex 6 and submitted to the PMU bi-weekly.*

*Additionally, general construction phase monitoring reports shall be produced and submitted to the PMU as per the requirements of ESCP developed for the project.*

**Annex a: Project Team Information**

#	Staff Name	Role	Nationality	ID Card / Work Permit No	Age	Do not fall under COVID19 high risk category	Not a direct contact of a COVID19 positive case	Present location (indicate if in an island under COVID19 monitoring)
1		Work Supervisor						
2		Health and Safety Supervisor						
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								

## **Annex b: Contractors Declaration**

*I / we hereby declare that the information provided in the attached “project team information” sheet and “details of health and safety items to be brought to the facility” sheet is true and accurate. I / we also confirm that the project team does not contain any member with a potential risk of carrying and transmitting COVID19, nor has been in contact with a COVID19 confirmed case, nor has a member that falls under high-risk category or if a high-risk member is included, he/she has been vaccinated.*

*I / we hereby also provide full assurance and commitment to undertake the preventive measures prescribed in the guidance note on “COVID19 Special Consideration in Civil Works Contracts” and mitigation and monitoring requirements for the construction phase presented in the ESMP for the project. I / we also agree to the timely submission of Health and Safety Monitoring Report and the ESMP Monitoring Report on a monthly basis.*

*Name:*

*Designation:*

*Contact:*

*Signature:*

*Stamp:*

*Date:*

***Annex C: Details of health and safety items proposed to be used***

<b>#</b>	<b>Item Name</b>	<b>Quantity</b>	<b>Intended Purpose of Use</b>
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			

**Annex d: Wash guidance from who**

# How to Handwash?

WASH HANDS WHEN VISIBLY SOILED! OTHERWISE, USE HANDRUB!

Duration of the entire procedure: 40-60 seconds

 0 Wet hands with water	 1 Apply enough soap to cover all hand surfaces	 2 Rub hands palm to palm
 3 Right palm over left dorsum with interlaced fingers and vice versa	 4 Palm to palm with fingers interlaced	 5 Backs of fingers to opposing palms with fingers interlocked
 6 Rotational rubbing of left thumb clasped in right palm and vice versa	 7 Rotational rubbing, backwards and forwards with clasped fingers of right hand in left palm and vice versa	 8 Rinse hands with water
 9 Dry hands thoroughly with a single use towel	 10 Use towel to turn off faucet	 11 Your hands are now safe

World Health Organization | Patient Safety | SAVE LIVES Clean Your Hands

Source: WHO (2008)

# How to Handrub?

RUB HANDS FOR HAND HYGIENE! WASH HANDS WHEN VISIBLY SOILED

**⌚** Duration of the entire procedure: 20-30 seconds



World Health Organization

Patient Safety  
*A World Away from Your Own Care*

SAVE LIVES  
Clean Your Hands

Close bag with a single overhand knot: ✓



Do not close by crossing ("bunny or dog-ear")





**Annex e: Important contacts**

The infographic displays a grid of important contacts for lockdown. At the top center is the Maldivian coat of arms. Below it, the contacts are organized as follows:

<p><b>ICP - 9300918</b></p> <p>Incident Command Post Information or Help during lockdown</p>	<p><b>HPA - 1676</b></p> <p>Urgent medical requests (from monitoring places)</p>	<p><b>7289259</b></p> <p><b>FLU CLINIC</b></p>	<p><b>Tree</b></p> <p>Telemedic care@tree</p>
<p><b>HMH- 1417</b></p> <p>Hulhumale Hospital Medical hot line - 9651354 Prescription renewal: hmhhospital.doc@gmail.com</p>	<p><b>1412</b></p> <p>Min. of Gender, Family &amp; Social Services 3328393 Report child abuse cases &amp; immediate social care</p>	<p><b>7953535 / 7963535</b></p> <p><b>HDC Maintenance</b></p>	<p>permit to go need <b>police.g</b></p>
<p><b>7223131 / 9423131</b></p> <p>Contact relatives in quarantine facilities</p>	<p><b>Kalaafaanu School</b></p> <p>Send essential item(s) to quarantine facilities (Sat &amp; Wed 11:00-15:00)</p>	<p><b>STO Pharmacy</b></p> <p>Order prescription medicine sto.mv/online/prescriptions</p>	<p><b>Phys</b> (12 Mal</p>

**Hulhumale Police** **IMPORTANT NUMBERS – LOCKDO**

## Annex f: Health and safety monitoring report template

Project Title:

Report No:

Proponent: Accelerating Sustainable Private Investment in Renewable Energy Project

Date:

Contractor:

Mitigation Measure	Status (✓ / X)	Comments / Photographic Reference
<b>Preconstruction Phase</b>		
<b>Actions Needed Prior to Mobilization</b>		
<ul style="list-style-type: none"> <li>In general, the project team shall not contain any member that falls under the high-risk category. If a high-risk category member is included, he/she shall be vaccinated.</li> </ul>		
<ul style="list-style-type: none"> <li>Sufficient supply of PPEs, cleaning items and other items required to set by the labor camp is brought such as:               <ul style="list-style-type: none"> <li>➤ Thermometer</li> <li>➤ First-aid kit</li> <li>➤ General flu medicine</li> <li>➤ Masks</li> <li>➤ Gloves</li> <li>➤ Foot operated lidded dustbins</li> <li>➤ Dustbin bags</li> <li>➤ Disinfecting liquid such as bleach</li> <li>➤ Cleaning equipment (broom, mop etc.)</li> <li>➤ Hand sanitizers</li> <li>➤ Soap</li> </ul> </li> </ul>		
<ul style="list-style-type: none"> <li>Contractor's Declaration is submitted</li> </ul>		
<b>Measures for Setting up Labor Camp</b>		
<ul style="list-style-type: none"> <li>Social Distancing Norms are facilitated when setting up labor camp. Each bed must be separated by a distance of at least 3 to 6 feet.</li> </ul>		
<ul style="list-style-type: none"> <li>Accommodation are kept properly ventilated. Windows must be kept open.</li> </ul>		
<ul style="list-style-type: none"> <li>A foot operated lidded bin is kept at or just outside the accommodation to collect general waste generated by the workers.</li> </ul>		
<ul style="list-style-type: none"> <li>Foot operated lidded bins are kept at the work site and at the kitchen and dining area to collect general waste. Double bags shall be placed inside these bins.</li> </ul>		
<ul style="list-style-type: none"> <li>Hand sanitizers are to be kept at entrance point to the accommodation (wall mounted or kept on top of a table) as well as inside the accommodation facility preferably at each bed side. Handwashing facilities can be set up as an alternative</li> </ul>		

<ul style="list-style-type: none"> <li>Establish handwashing facilities at the work site and eating or resting areas. Hand Sanitizers can be used as an alternative.</li> </ul>		
<ul style="list-style-type: none"> <li>Ensure handwashing facilities supplied with soap, disposable paper towels and closed waste bins exist at toilets, kitchen and dining area. Alcohol based sanitizer (if available, 60-95%alcohol) can also be used.</li> </ul>		
<ul style="list-style-type: none"> <li>Place posters and signs around the site, with images and text in local languages providing guidance on signs and symptoms of COVID-19, how it is spread, how to protect themselves (including regular handwashing and social distancing) and what to do if they or other people have symptoms.</li> </ul>		
<b>Construction Phase</b>		
<b>Checks on Commencement of Work</b>		
<ul style="list-style-type: none"> <li>The movement of the workers shall be restricted from the labor camp to the work site and from the work site to the labor camp.</li> </ul>		
<ul style="list-style-type: none"> <li>The workers shall avoid contact with the general public of the project island.</li> </ul>		
<ul style="list-style-type: none"> <li>Daily temperature checks shall be taken and recorded prior to leaving the labor camp and entering the work site. Logs shall be maintained and attached to the monthly Health and Safety report.</li> </ul>		
<ul style="list-style-type: none"> <li>Provide daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures, using demonstrations and participatory methods.</li> </ul>		
<ul style="list-style-type: none"> <li>During the daily briefings, remind workers to self-monitor for possible symptoms (fever, cough) and to report to the supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell.</li> </ul>		
<ul style="list-style-type: none"> <li>If there is any symptom of COVID19 (fever, cough), the staff must be immediately isolated, referred to the health center and the concerned authorities must be notified. This staff shall not be involved in the project team until cleared by the respective authorities.</li> </ul>		
<ul style="list-style-type: none"> <li>Any other staff who have had close contact with the staff who developed symptoms must be self-quarantined for 14 days and shall not be allowed to enter the project site or move about in the project island, even if there are no symptoms. The directions given by the authorities shall be strictly followed.</li> </ul>		
<b>Clean and Waste Disposal</b>		
<ul style="list-style-type: none"> <li>The tools and equipment used by the workers must be cleaned when changing shifts.</li> </ul>		

<ul style="list-style-type: none"> <li>• <i>Cleaning staff shall use appropriate PPEs such as masks and gloves.</i></li> </ul>		
<ul style="list-style-type: none"> <li>• <i>The labor camp must be cleaned frequently (at least once a day) including accommodation facility, kitchen, dining area and toilets. The floor, walls and door knobs shall be properly cleaned using 1:9 bleach solution. Sheets and linings must be changed at least weekly.</i></li> </ul>		
<ul style="list-style-type: none"> <li>• <i>Any waste produced during the care of ill workers shall be collected separately in designated containers or bags and treated and disposed of according to the SOPs of HPA and WHO. This includes placing double bags inside the bins, properly tying and removing the bags when 2/3 are full and disinfected by spraying with 1:9 bleach solution.</i></li> </ul>		
<b>Adjusting Work Practices</b>		
<ul style="list-style-type: none"> <li>• <i>Changing to a 24-hour work rotation.</i></li> </ul>		
<ul style="list-style-type: none"> <li>• <i>Adapting or redesigning work processes for specific work activities and tasks to enable social distancing, and training workers on these processes.</i></li> </ul>		
<ul style="list-style-type: none"> <li>• <i>Consider changing canteen layouts and phasing meal times to allow for social distancing.</i></li> </ul>		
<ul style="list-style-type: none"> <li>• <i>Consider using of dust masks in addition to the general construction PPEs.</i></li> </ul>		
<b>Grievance Redress Mechanism</b>		
<ul style="list-style-type: none"> <li>• <i>Project board and posters containing the details of contact person from contractor, island council and PMU are placed in various locations of the project site and the labor camp.</i></li> </ul>		
<ul style="list-style-type: none"> <li>• <i>Log records of grievances are maintained</i></li> </ul>		

## Annex 6: Summary of Applicable Laws and Policies

### **Employment Act 2008 [2/2008]**

Employer/employee relationships are governed under the Employment Act (2/2008) and the subsequent amendments to it. An employer is defined in the Act as, “any person, company, government or association of persons providing employment pursuant to an employment agreement which includes the use of services of non-independent contractors, successors, assigns of such employers, and any person to whom the rights of such employers are transferred in accordance with the law”. An employee is any person seeking to work pursuant to an employment agreement. Maldives National Defense Force and Maldives Police Service are exempted from the Act. The Act prohibits forced employment, and discrimination in granting of employment, increase in remuneration, provision of training, determination of conditions and manner of employment, dismissal and resolution of other employment related issues; based on race, color, social standing, religion, political beliefs or affiliation with any political party, sex, marital status, family obligations, age or disability.

#### **Minors**

The law considers a minor to be a person under the age of 18. Chapter 3 of the Employment Act allows minors between the ages of 16 and 18 to be engaged in employment, provided consent is obtained from their legal guardian. Minors under the age of 16 are prohibited from engaging in employment, unless it is as part of a training for their education. A minor may also be employed in a family business with the consent of such minor and their family. All children are protected from employment that would have a detrimental effect on their health, education, safety or conduct. These rights are further stipulated in the Rights of the Child Act [19/2019] under which the Labour Relations Authority (LRA), is mandated to enact necessary regulations and monitoring the implementation of the same, for the prevention of child labour.<sup>4</sup>

#### **Employment Agreement**

All employers are required to enter in to an employment agreement in writing, with their employees. The Act recognizes three types of employment agreements, which are, (a) fixed term contracts or agreements with a definite term, (b) agreements with an indefinite term or permanent employment agreements, and (c) agreements for a specific task or project.<sup>5</sup> Direct workers or project staff in the

---

<sup>4</sup> Article 26, [19/2019]

<sup>5</sup> Article 13, [2/2008]

PMU falls under this latter category. Such agreements are considered neither permanent nor fixed term contract. And they are considered terminated upon the completion of the specific task or project.

All agreements must at minimum have included in them the following details;

- i. The name of the employee, permanent address, current address, identity card number or passport number, date of birth, nationality, emergency contact person's name, address and phone number;
- ii. Whether employment is permanent or temporary;
- iii. Date of commencement of employment agreement;
- iv. Salary and other benefits;
- v. Method and guidelines for calculation of salary;
- vi. Pay day;
- vii. Days on which leave may be granted;
- viii. Principles pursuant to which disciplinary measures may be taken against the employee due to his conduct;
- ix. Staff appraisal; and
- x. Manner of dismissal from employment.

Employers are also obligated to provide employees with a job description.

### **Working Hours**

Working hours of employees, under the Employment Act must not exceed 48 hours per week. This however does not cover overtime work.<sup>6</sup> Employees may not work for more than six consecutive days without taking a day off. The employment agreement must stipulate how overtime work can be obtained from an employee. Employees working overtime are entitled to a pay of 1 ¼ times their hourly wage and if working on a public holiday, 1 ½ times their hourly wage.<sup>7</sup>

### **Dismissal**

Employees have a right not to be dismissed unfairly, without cause. The Act provides a list of disciplinary measures that can be taken reasonably against an employee due to misconduct and which must ordinarily be exhausted before any dismissal. This includes, cautioning verbally, a written warning, 14 day suspension and demotion, in that order.

Employers must establish procedural fairness and substantive fairness before an employee is dismissed. Procedural fairness is ensuring that due process of the law is followed in any decision to

---

<sup>6</sup> Article 32, [2/2008] as amended by Article 6 Second Amendment Act to the Employment Act [14/2008]

<sup>7</sup> Article 38, Employment Act [2/2008]

dismiss an employee, including among other things, providing the employee with due notice or money in lieu of such notice and ensuring that the employee is given ample opportunity to defend themselves. Substantive fairness means the actual reason or the misconduct of the employee preceding such dismissal must be one that warrants dismissal. It must be reasonable and fair. The employers must take in to account the circumstances surrounding the case, the previous records of the employee, and actions taken for similar conduct in previous cases.<sup>8</sup>

### **Leave**

Entitled leaves for employees under the Act includes, 30 (thirty) days of paid annual leave, 30 (thirty) days of paid sick leave, 60 (sixty) days of paid maternity leave, upon expiry of which either parent may choose to take up to 01 (one) year of unpaid leave, 03 (three) days of paid paternity leave, 10 (ten) days of paid leave for family responsibility, and 05 (five) days of paid leave for a parent of a child undergoing circumcision.<sup>9</sup>

On March 2019, the government decided to grant all government employees with a paid maternity leave and paternity leave of 06 (six) months and 01 (one) month, respectively. This practice has since been taken up by state owned enterprises as well.

### **Training**

Employees may be engaged with training, on the job or otherwise, subject to a separate agreement entered in to with the employer, for the purpose. The agreement must have in them at minimum, the details of the employer and the employee along with, details of the type of training, the period it would take to complete the training, costs incurred by the employee in relation to the training and the rights and obligations of each party if the training is not completed.<sup>10</sup>

### **Health and Safety**

All employers are obligated under the Act to take measures for the safety and protection of their employees, without any charge. These measures include;

- Providing a safe work place environment and procuring of secure tools and machinery for carrying out work, and ensuring the continued safety of the same;
- provide resources necessary to carry out the work with safety;
- provide protective attire and equipment in the event that the nature of work is such that it is not possible to eliminate or control health hazards arising out of work;

---

<sup>8</sup> High Court of Maldives case number: 209/HC/2010

<sup>9</sup> Articles 39-49, [2/2008]

<sup>10</sup> Article 70, [2/2008]

- provide education and training to employees on the use of protective gear and safety equipment, and disseminate information to employees on all issues of related concern;
- conduct regular health checks for employees involved in any work that may cause physical ill health or for employees working with chemical or biological materials that may pose a threat to their health;
- provide or arrange for appropriate medical care for employees injured during the course of their employment
- facilitate first aid to employees who are involved in emergencies or accidents.

Employees are required to;

- maintain safe practices at work to avoid danger to the safety and wellbeing of the employee and co-workers, which may be caused by inattentiveness to safety and security measures;
- assist the employer and co-workers in maintenance of measures designed to ensure health and safety in the work place;
- use safety equipment and protective gear as instructed in accordance with the training and education provided for use of such equipment and gear;
- report to the employer any damage, loss of or destruction of protective gear or safety equipment;
- inform the employer or his designated supervisor immediately of the occurrence of any incident which the employee believes may cause danger and which the employee is unable to resolve;
- inform the employer or his designated supervisor of any accidents or damage sustained at work or related to work.

Employees have the right to abstain from work where there is serious threat to health or life.<sup>11</sup>

### **Unionizing, collective bargaining and the right to strike**

The Employment Act 2008 is notably silent on the right to strike or the right to form trade unions and is lacking of any provisions on collective bargaining. While these are constitutional rights, and Maldives remain party to the ILO Convention on Right to Organize and Collective Bargaining (No. 98), there is a lack of a specific legislative framework ensuring the right to organize and collectively bargain. Employees can however create clubs and associations, which are governed under the Associations Act (1/2003). Such clubs and association are required under the law to be registered at the ministry with the relevant mandate.

---

<sup>11</sup> Articles 73-76, [2/2008]



The Regulation on Resolving Disputes between Employers and Employees (2011/R-12), issued by Labour Relations Authority outlines principles for employees to comply with in exercising the right to strike and abstain from work. To strike, under the Regulation is defined as, to abstain from work by peaceful exercise of the employees' freedom of assembly and speech. Under the Regulation, before any decision is taken to conduct a strike due to a dispute between the employers, the employees are to carry out discussions with their respective employers. The Regulation provides for a three tier process to be followed in carrying out such discussions. First step involves informal discussion between the parties failing which formal discussions are to be held at a sectional or departmental level. Second tier involves lodging the grievances to a Grievance Committee made up of the head of the respective organization, heads of the relevant departments, and parties representing the aggrieved employee(s). If the Grievance Committee fails to resolve the dispute, the matter is to be forwarded to the Labour Relations Authority. If either party is dissatisfied with the decision of the Authority, the matter can be submitted to the Employment Tribunal for adjudication.

### **Redress, Labour Relation Authority and Employment Tribunal**

Labour Relations Authority (LRA) formed under Article 77 of the Employment Act (2008) is mandated with implementing the necessary administrative measures to ensure compliance with the Act. The Authority also issues regulations governing employer/employee relationships. As such employees can lodge complaints to LRA, regarding an employer's action which they deem is in contravention of the law, and request to enforce compliance.

LRA has the authority to enter in to and inspect work places and obtain documents through Employment Officials. Officials have the authority to order an employer to make changes, within a specified time, to the machinery or the manner in which an equipment is set up, to ensure health and safety of the employees as stipulated under law. An officials can also order urgent steps to be taken in order to avert a danger where the risk of a danger to the employee's health and safety exists in the opinion of such official.

If an employer is unhappy with the decision or order of LRA, they can appeal to Employment Tribunal.

The Tribunal established under Article 85 of the Employment Act consists of 07 (seven) members appointed by the President. The members hold office for a tenure of 05 (five) years and should have the educational qualifications and experience to comprehend and resolve employment related issues.

The Tribunal reviews and deliberates at the first instance on matters of employment. Decisions of the Tribunal are appealed at the High Court.

## Health and Safety Regulation for Construction industry (2019/R-156)

The aim and objective of this regulation is to provide minimum standard for safety and security of the community and labour force<sup>12</sup>. The regulation suggests that if the value of the project exceeds 1.5 million Maldivian Rufiyaa, health and safety aspects regarding the project needs to be defined and training given to the labour force<sup>13</sup>. It states that safety nets needs to be installed and other precautionary measures taken such that the neighbouring households are not impacted as a result of the project<sup>2</sup>. It also stipulates that Personal Protective Equipment (PPE) that is relevant to the work undertaken shall be worn. In this regard, it states that safety helmets, safety shoes, safety goggles, welding mask and gloves need to be used where required. The same article stipulates that, it is the responsibility of the employer to provide PPE to the employee<sup>2</sup>. It also stipulates that steps need to be undertaken during excavation to ensure damage to nearby properties are avoided. It also stipulates that appropriate safety signs need to be installed in construction site.

Furthermore, Emergency Response Plan (ERP) is required for projects that exceeds MVR 1.5 million<sup>14</sup>. The provision requires the emergency response plan to be visible and to undertaken drill for emergency response plan at least twice every year. Moreover, a complete first aid kit and a trained first aid person shall always be available at the construction site for such projects<sup>3</sup>. The contractor is also required to assign a site safety supervisor<sup>15</sup>. Such a person shall have a minimum five year experience working as a site supervisor.

The regulation also stipulates that for projects above MVR 5 million third party insurance needs to be taken to cover for damages<sup>16</sup>. The regulation also have provisions that highlights that all open pits shall be covered or demarcated with fence, to have pedestrian detour if work is undertaken next to a road, If work is undertaken in height safety warning signs or warning flags or lights need to be installed at the site and all idle equipment's need to be switched off<sup>17</sup>. The regulation also suggest that the construction boundary needs to be hoarded. As per the regulation, the minimum height of the hoarding shall be 1800 millimeters<sup>18</sup>.

If working above 03 meters it is stated that a guardrail shall be there to prevent falling from height<sup>19</sup>. Moreover, it is stated that safety harness and belt need to be used when working at such heights. The regulation also has special provisions when working on roofs<sup>20</sup>. Use of static line and inertia reel when

---

<sup>12</sup> Article 2, [2019/R-156]

<sup>13</sup> Article 5, [2019/R-156]

<sup>14</sup> Article 6, [2019/R-156]

<sup>15</sup> Article 7, [2019/R-156]

<sup>16</sup> Article 9, [2019/R-156]

<sup>17</sup> Article 10, [2019/R-156]

<sup>18</sup> Article 12, [2019/R-156]

<sup>19</sup> Article 14, [2019/R-156]

<sup>20</sup> Article 16, [2019/R-156]

working on roofs and ensuring that they are installed appropriately. Preassembling the materials required as much as possible prior to lifting to the roof, to minimize work undertaken on the roof. Scaffolding shall be installed by a person who has special training and experience for installing scaffolding<sup>9</sup>. The regulation also states that While installing safety net work shall be undertaken using a mobile scaffolding or a tower scaffolding<sup>9</sup>. All scaffolding used on site needs to be tested at least once a week<sup>21</sup>.

Specific provisions are also there regarding electricity supply. In this regard one of the following conditions shall be met<sup>22</sup>:

1. All electric equipment shall be connected to a supply that does not exceed 230 V.
2. To install an earth circuit monitor on the electricity supply line.
3. Use of equipment that have double insulation.
4. Utilize earth leakage circuit breaker.

The switchboard installed to provide temporary power shall be covered to prevent weather damage<sup>23</sup>.

The regulation stipulates that all electrical equipment used on the site needs to be tested every 03 months to ensure functionality and safety<sup>24</sup>. The regulation also highlights that where chemicals and hazardous materials are used each contractor needs to identify a plan to handle such material and the identified plan needs to be implemented in the work site<sup>25</sup>. It is also suggested when handling hazardous materials, the workers need to be fully covered.

If any flammable materials are on site fire fighting equipment shall be available and fire protection clothing shall be available on site<sup>26</sup>. The regulation suggests that heavy machinery like cranes shall not be used in any areas where public could access<sup>27</sup>. Moreover, the same article states that cranes shall operate 04 meters away from any overhead electric lines. Moreover cranes shall be inspected every 12 months and the records of the inspection shall be kept available in the crane.

To keep log records of any accidents that occur in site and reporting any such incident to police is also specified in the regulation<sup>28</sup>. The regulation also specified non-compliance penalties<sup>29</sup>.

## **Prevention of Sexual Harassment Act (16/2014)**

---

<sup>21</sup> Article 18, [2019/R-156]

<sup>22</sup> Article 20, [2019/R-156]

<sup>23</sup> Article 21, [2019/R-156]

<sup>24</sup> Article 22, [2019/R-156]

<sup>25</sup> Article 24, [2019/R-156]

<sup>26</sup> Article 29, [2019/R-156]

<sup>27</sup> Article 32, [2019/R-156]

<sup>28</sup> Article 39, [2019/R-156]

<sup>29</sup> Article 43 & 44, [2019/R-156]

Prevention of Sexual Harassment Act (16/2014) prohibits employers and employees from subjecting those who work under them or their co-workers to any extent any type of sexual harassment. Sexual Harassment is defined in the Act as, any sexual act committed against a person without their consent. A sexual act, for the purposes of the Act, is any action, whether physical, verbal or otherwise, which according to a reasonable person, suggests a sexual intent towards the victim. Any such act is to be proven on the balance of probability.<sup>30</sup> It is the duty of the employer to take reasonable steps to ensure that the work environment is an environment that is free from sexual harassment and one in which such acts does not negatively affect the work of employees.<sup>31</sup> Employers are obliged to establish policies to prevent sexual harassment and have such policies published,<sup>32</sup>

Every government office including the presidents' office, independent institutions, parliament, the courts and all work places with more than 30 employees must have, under the Act, a Sexual Harassment Prevention Committee, with the function, among other things, of hearing complaints, investigating potential acts of harassment and take proper action against perpetrators in accordance with the Employment Act.<sup>33</sup> The Committee consists of 03 members out of which one must be female. The Committee can, depending on the gravity of the action, take disciplinary actions ranging from cautioning, suspension, demotion and dismissal.<sup>34</sup> Decisions must be taken within 60 days of receiving a complaint. Decisions of the Committee can be appealed at Employment Tribunal.<sup>35</sup>

## **Gender Equality Act 2016 (18/2016)**

Employers are further mandated under the Gender Equality Act (18/2016), to ensure non-discrimination based on gender. The Act stipulates that all government offices and private businesses must take appropriate measures to achieve the following goals;

- Abolish gender based discrimination, including direct and indirect discrimination.
- Abolish all systemic discrimination caused through established systems with unequal practices.
- Promote equal opportunities for men and women.
- Promote notions and ideas of gender equality to eliminate undesired preconceptions against a certain gender.<sup>36</sup>

---

<sup>30</sup> Articles 2, 3 [16/2014]

<sup>31</sup> Article 7, [16/2014]

<sup>32</sup> Article 13, [16/2014]

<sup>33</sup> Articles 17, 18, 19 [16/2014]

<sup>34</sup> Article 22, [16/2014]

<sup>35</sup> Article 26, [16/2014]

<sup>36</sup> Article 18, [18/2016]

Providing equal opportunity under the Act includes, (a) eliminating weaknesses or difficulties caused by inequality between men and women, (b) reducing the negative effects of inequality between men and women, (c) facilitating the special needs of a particular gender to achieve ease of attainment of services, and (d) evaluating the degree of participation of each gender in public life and public services and take appropriate steps to balance such participation.<sup>37</sup>

Public and private sector employers are further mandated under the Act to;

- (a) Provide equal opportunity to men and women in the employment, training and advancement of position.
- (b) Provide equal wages to men and women who perform the same responsibilities at the same place of employment.
- (c) Men and women at the same place of employment with work adequately equal in value and weight shall be given equal wages, overtime compensation, benefits and allowances.
- (d) Employment opportunities shall not be offered or advertised to restrict a particular gender, except in circumstances the work is required to be undertaken by a particular gender.
- (e) Announcements and advertisements for work that is likely to attract more men than women must be designed to invite and not to exclude women.
- (f) Take all possible steps to eliminate obstructions to employment of women and to create conducive work environments for women.
- (g) Establish a complaints mechanism.<sup>38</sup>

### **Maldives Pension Act (18/2016)**

Employers must enrol their employees in the Maldives Retirement Pension Scheme, and it is obligatory on the employees to participate in the scheme, under Article 12 of the Maldives Pension Act (18/2016). Failure to do so would amount to an offense under the Act. And as such the employment agreement is required to have provisions for deductions for pension contributions by the employee.

Each person who is considered a participant of the Retirement Pension Scheme of the Maldives, is required to pay a minimum of 7% of the employee's pensionable wage, and the employer must also pay a minimum of 7% of the pensionable wage to the scheme.<sup>39</sup>

---

<sup>37</sup> Article 19, [18/2016]

<sup>38</sup> Article 20, [18/2016]

<sup>39</sup> Article 14, [18/2016]

## **Migrant Workers**

Foreigners are required to obtain an employment approval as per applicable law, and deposit a security with the relevant government agency. This deposit is to be used by the government for costs incurred to remedy an employers' default of their responsibilities under relevant Regulation on Employment of Expatriates in Maldives (2011/R-22), or as payment for any unpaid fees related to work permit or work visa, or for travel expenses of the worker, where government decides to deport such worker. Article 62 of the Employment Act gives the minister with the relevant government mandate to issue regulations related to the employment of foreigners.

Under the Regulation on Employment of Expatriates in Maldives (2011/R-22), government issues a specific number of "Quotas" for companies, upon request in order to employ expatriates. No foreigner is allowed to work in the Maldives without a valid work permit and a work visa. Employers are required to treat their foreign employees in accordance with the Employment Act and other applicable law. They are responsible for paying any fees related to the work permit or visa accordingly and of returning the worker to their home country once the work permit expires, or if for any reason the government decides that the worker shall leave the country. Employers are also required to, upon the death of a worker, to return the body to their family in their home country.

## **International Labour Organization Conventions**

Maldives have ratified a number of International Labour Organization Conventions on 04<sup>th</sup> January 2013. These conventions are described in brief below:

1. Forced Labour Convention, 1930 (No. 29): "This fundamental convention prohibits all forms of forced or compulsory labour [...] Exceptions are provided for work required by compulsory military service, normal civic obligations, as a consequence of a conviction in a court of law [...], in cases of emergency, and for minor communal services performed by the members of a community in the direct interest of the community. The convention also requires that the illegal extraction of forced or compulsory labour be punishable as a penal offence, and that ratifying states ensure that the relevant penalties imposed by law are adequate and strictly enforced." (See Rules of the game: a brief introduction to international labour standards, p. 35)
2. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87): "This fundamental convention sets forth the right for workers and employers to establish and

join organizations of their own choosing without previous authorization. Workers' and employers' organizations shall organize freely and not be liable to be dissolved or suspended by administrative authority, and they shall have the right to establish and join federations and confederations, which may in turn affiliate with international organizations of workers and employers.” (See Rules of the game: a brief introduction to international labour standards, p. 28).

3. Right to Organise and Collective Bargaining Convention, 1949 (No. 98): “This fundamental convention provides that workers shall enjoy adequate protection against acts of anti-union discrimination [...] Workers' and employers' organizations shall enjoy adequate protection against any acts of interference by each other [...] The convention also enshrines the right to collective bargaining” (See Rules of the game: a brief introduction to international labour standards, pp. 28-29).
4. Equal Remuneration Convention, 1951 (No. 100): “This fundamental convention requires ratifying countries to ensure the application of the principle of equal remuneration for men and women workers for work of equal value. The term ‘remuneration’ is broadly defined to include the ordinary, basic or minimum wage or salary and any additional emoluments payable directly or indirectly, whether in cash or in kind, by the employer to the worker and arising out of the worker’s employment” (See Rules of the game: a brief introduction to international labour standards, p. 40).
5. Abolition of Forced Labour Convention, 1957 (No. 105): “This fundamental convention prohibits forced or compulsory labour as a means of political coercion or education or as a punishment for holding or expressing political views or views ideologically opposed to the established political, social or economic system; as a method of mobilizing and using labour for purposes of economic development; as a means of labour discipline; as a punishment for having participated in strikes; and as a means of racial, social, national or religious discrimination” (See Rules of the game: a brief introduction to international labour standards, p. 35).
6. Discrimination (Employment and Occupation) Convention, 1958 (No. 111): “This fundamental convention defines discrimination as any distinction, exclusion or preference made on the basis of race, colour, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation. [...] It requires ratifying states to declare and pursue a national policy designed to promote, by methods appropriate to national conditions and practice, equality of opportunity and treatment in respect of employment and occupation, with a view to eliminating any discrimination in these fields. The Convention covers discrimination in relation

to access to education and vocational training, access to employment and to particular occupations, as well as terms and conditions of employment.” (See Rules of the game: a brief introduction to international labour standards, p. 42).

7. Minimum Age Convention, 1973 (No. 138): “This fundamental Convention sets the general minimum age for admission to employment or work at 15 years (13 for light work) and the minimum age for hazardous work at 18 (16 under certain strict conditions). It provides for the possibility of initially setting the general minimum age at 14 (12 for light work) where the economy and educational facilities are insufficiently developed.” (See Rules of the game: a brief introduction to international labour standards, p. 37).
8. Worst Forms of Child Labour Convention, 1999 (No. 182): “This fundamental Convention defines as a “child” a person under 18 years of age. It requires ratifying states to eliminate the worst forms of child labour, including: all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict; child prostitution and pornography; using children for illicit activities, in particular for the production and trafficking of drugs; and work which is likely to harm the health, safety or morals of children. The Convention requires ratifying states to provide the necessary and appropriate direct assistance for the removal of children from the worst forms of child labour and for their rehabilitation and social integration. It also requires states to ensure access to free basic education and, wherever possible and appropriate, vocational training for children removed from the worst forms of child labour.” (See Rules of the game: a brief introduction to international labour standards, p. 37).

In addition, the following environmental laws and policies that are applicable to the project as identified in pages 35 to 39 of the ESMF needs to be followed by the contractor. Including attaining all the required permits where required other than the approvals required through Environmental Impact Assessment Regulations (No. 2012/R-27). As per the requirement of ESMF of the project the approval required through No. 2012/R-27 regulation will be attained by the Employer.

### **The Environment Protection and Preservation Act (4/93)**

The basic environment law, Law No.4/93 Environment Protection and Preservation Act (EPPA) was enacted in April 1993 as an umbrella law to protect and preserve the environment of the country. The main elements of the EPPA are as follows:



Introduction: The natural environment and its resources are a national heritage that needs to be protected and preserved for the benefit of future generations. The protection and preservation of the country's land and water resources, flora and fauna as well as the beaches, reefs and lagoons and all-natural habitats are important for the sustainable development of the country.

Environmental Guidance: The concerned government authority shall provide the necessary guidelines and advise on environmental protection in accordance with the prevailing conditions and needs of the country. All concerned parties shall take due considerations of the guidelines provided by the government authorities.

Environmental Protection and Conservation: The Ministry of Environment, Energy and Water [*now the Ministry of Environment, Climate Change and Technology*] shall be responsible for formulating policies, as well as rules and regulations regarding the environment in areas that do not already have a designated government authority already carrying out such functions.

Protected Areas and Natural Reserves: The Ministry of Environment, Energy and Water [*now the Ministry of Environment, Climate Change and Technology*] shall be responsible for identifying protected areas and natural reserves and for drawing up the necessary rules and regulations for their protection and preservation. Anyone wishing to establish any such area as mentioned in (a) of this clause, as a protected area or a reserve shall register as such at the ministry of Environment, Energy and Water [*now the Ministry of Environment, Climate Change and Technology*] and abide by the rules and regulations laid by the Ministry.

Environmental Impact Assessment (EIA): An impact assessment study shall be submitted to the Ministry of Environment, Energy and Water [*now the Ministry of Environment, Climate Change and Technology*] before implementing any development project that may have a potential impact on the environment. The Ministry of Environment, Energy and Water [*now the Ministry of Environment, Climate Change and Technology*] shall formulate the guidelines for EIA and shall determine the projects that need such assessment as mentioned in paragraph (a) of this clause.

The Termination of Projects: The Ministry of Environment, Energy and Water [*now the Ministry of Environment, Climate Change and Technology*] has the authority to terminate any project that has any undesirable impact on the environment. A project so terminated shall not receive any compensation.

Waste Disposal, Oil and Poisonous Substances: Any type of waste, oil, poisonous gases or any substance that may have harmful effect on the environment shall not be disposed within the territory of the Maldives. In case where the disposal of the substance stated in paragraph (a) of this clause becomes absolutely necessary, they shall be disposed only within the areas designated for the purpose by the government. If such waste is to be incinerated, appropriate precautions shall be taken to avoid any harm to the health of the population.

Hazardous/ Toxic or Nuclear Wastes: Hazardous/Toxic or Nuclear Wastes that is harmful to human health and the environment shall not be disposed anywhere within the territory of the country. Permission shall be obtained from the relevant government authority at least 3 months in advance for any trans-boundary movement of such wastes through the territory of the Maldives.

The Penalty for Breaking the Law and Damaging the Environment: The penalty for minor offenses in breach of this law or any regulations made under this law shall be a fine ranging between MVR 5.00 (five Rufiyaa) and MVR 500.00 (five hundred Rufiyaa) depending on the actual gravity of the offence. The fine shall be levied by the Ministry of Environment, Energy and Water [*now the Ministry of Environment*] or by any other government authority designated by the ministry. Except for those offenses that are stated in (a) of this clause, all major offenses, under this law shall carry a fine of not more than Rf 100,000,000.00 (one hundred million Rufiyaa) depending on the seriousness of the offense. The fine shall be levied by the Ministry of Environment, Energy and Water [*now the Ministry of Environment*].

Compensation: The Government of Maldives reserves the right to claim compensation for all the damages that are caused by the activities that are detrimental to the environment. This include all the activities that area mentioned in clause 7 of this law as well as those activities that take place outside the projects that are identified here as environmentally damaging.

Definitions: Under this Law: (a) The “environment” means all the living and non-living things that surround and effects the lives of human beings; and (b) A “project” is any activity that is carried out with the purpose of achieving a certain social or economic objective.

### **The Regulation on Environmental Liabilities (Regulation No. 2011/R-9)**

The objective of this regulation is to prevent actions violating the Environmental Protection and Preservation Act 4/93 and to ensure compensations for all the damages that are caused by activities that are detrimental to the environment.

The regulation sets mechanisms and standards for different types of environmental liabilities and equal standards that shall be followed by the implementing agency while implementing the regulation.

According to this regulation the Government of Maldives reserves the right to claim compensation for all the activities which have breached the Environmental Protection and Preservation Act 4/93.

### **Environmental Impact Assessment Regulation (No. 2012/R-27) and amendments**

EPA stipulates under Article 5, any development work or project that have a significant impact on the environment shall have an Environmental Impact Assessment consented to by the Ministry of Environment, Energy and Water [*now the Ministry of Environment*].

The EIA regulation defines the procedure to follow when attaining environmental approval for development projects. The regulations lists those projects that require EIA (schedule D), those projects that do not require EIA (Schedule T) and those projects that can be undertaken as per the mitigation plan provided by EPA (Schedule U). Roof mounted solar PV projects are listed in Schedule T, thus locally environmental assessments are not required for roof mounted solar PV.

All the other projects need to go through a screening process identified in article 08 of the regulation. Following screening EPA decides the level of assessment required. In this regard, an EIA maybe required, EMP maybe required, project maybe undertaken with mitigation plan or project can be

undertaken with no assessment. For all other solar projects, ground mounted and floating solar, need to go through the screening process specified in the regulation

For projects that require EIA the regulation details the scoping process that needs to be following in article 11. Following scoping a terms of reference will be issued which will guide the level of assessment required.

EIA can be prepared by a consultant who is registered in EPA under article 16 of the regulation. The consultant registration process is administered by a consultant registration board. The functions and composition of this board is detailed in article 17 of the regulations.

Once the EIA report is submitted, EPA sends the review to two independent reviewers as per article 13 of the Regulation. The review period depends on the amount paid by the proponent for review. In this regard the following payment structure is specified in the regulations (article 07 and article 13):

1. For a review fee of MVR5000 15 days for review
2. For a review fee of MVR 10,000 10, days for review
3. For a review fee of MVR 5000 05 days for review

Following review EPA informs the proponent if any addition information is required, or approval can be given for the project, or the EIA report needs to be rejected or the project needs to be rejected due to irreversible damage to the environment.

Article 15 lists procedure for appeal the decision. The appeal decision will be made by Minister of Environment. Article 20 lists fining mechanism for non-compliance.

## **Regulation Governing Reclamation and Dredging of Islands and Lagoons of Maldives 2013/R-15**

The Article 22 of the Constitution states that the State shall undertake and promote desire based economic and social goals through ecologically balanced sustainable development and shall take measures necessary to foster conservation, prevention pollution, the extinction of any species and

ecological degradation from any such goals and this regulation is constituted for the purpose of pursuing this undertaking. It determines the guidelines that would minimize the damage caused to the environment due to reclamation and dredging pursuant to Article 3 of Environment Protection and Preservation Act. This regulation is enforced by the Environmental Protection Agency.

The aim of this regulation is to minimize environmental damage associated with dredging and reclamation activities. All dredging and reclamation activities requires EPA approval through this regulation. The regulation identifies the following conditions:

- Beach replenishment is restricted to a maximum extent of 10 m from the registered shoreline.
- The following restrictions apply to dredging:
  - 500 m from the ocean side reef edge
  - 50 m from the shoreline
  - An environmentally sensitive site
- Reclamation cannot take place within 200 m of an environmentally sensitive or protected area.
- Reclamation shall not exceed 30% of the house reef.

### **By-law - Cutting Down, Uprooting, Digging Out and Export of Trees and Palms from One Island to Another**

This regulation is enacted under Act 4/93 (environment Protection and Preservation Act). As such, this regulation is a compilation of guidelines to be adhered towards cutting-down, uprooting, removing and transfer between islands, of palms and trees in the Maldives.

Palms and trees may only be cut, uprooted, removed or transferred between islands out of mere necessity. No one shall be exempted from this regulation except the parties/exemptions mentioned in Article 4 of this regulation.

Article 8 of the regulation requires permission to be obtained if more than ten coconut palms that have grown to height of 15ft or if more than 10 plants that have grown to a height of 08ft are to be removed.

Article 2 (d) of the regulation also enforces replacement of the vegetation that is lost as a result of re-plantation. In this regard, 02 palms or trees need to be replanted for every palm or tree removed.

Pursuant to the *Environmental Protection and Preservation Act* of the Maldives, the Ministry of Environment, Climate Change and Technology has developed this by-law in order to educate and guide developers about acceptable practices for the management of trees and palms. The by-law prohibits the cutting down, uprooting, digging out and export of trees and palms from one island to another unless there is no other viable alternative. It also requires that for every tree or palm removed at least 2 shall be replanted on the same island. The by-law also provides particular protection to the following:

- coastal vegetation extending 15 metres into the island;
- all trees and palms growing in mangrove and wetland areas;
- all trees and palms growing in Government protected areas; and
- trees and palms that are abnormal in structure.

### **Waste Management Regulation (No. 2013/R-58)**

The Waste Management Regulation of the Maldives was enacted based on Article 22 of the Constitution of the Republic of Maldives and under powers vested in the Ministry of Environment, Climate Change and Technology under the Article 3 of the Environmental Preservation Act 4/93 in relation to Article 7 and 8 of the same Act. The regulation is implemented by the Environmental Protection Agency. This regulation focus on following five areas:

1. Waste management standards: Defines standards for waste collection, transfer, treatment, storage, waste site management, landfills and managing hazardous waste;
2. Waste management Permits: Defines approval procedures for waste sites;
3. Waster transfer: Standards and permits required for waste transport on land and sea, including trans-boundary movements;
4. Reporting requirements: Defines reporting and monitoring requirements and procedures; and
5. Enforcement: Defines procedures to implement WRM and penalties for non-compliance.

### **Dewatering Regulation (213/R-1697)**

This regulation is constituted for the purpose of ensuring that the drainage of water in the islands of The Maldives in the process of dewatering and subsequent dumping of discharge water into the soil or to the sea, is conducted with minimal impact to the environment. Given water is the source of life and one of the essential elements forming the environment, the purpose of this regulation is to avoid contamination of the groundwater table, to mitigate the damage caused to the water table; and to protect the habitat, the environment, the public and all living organisms from the impact of dewatering.

This regulation is enacted from the rights vested on the Ministry from article 3 of Act 4/93(Maldives Environment Protection and Preservation Act). This regulation is enforced by the Environment Protection Agency on behalf of the Ministry.

In addition to the institutions of the state, it is a responsibility of every individual to protect the groundwater table of the islands of the Maldives and to manage it in a sustainable manner. The process of dewatering for any industrial purpose shall be conducted on any island pursuant to the guidelines prescribed in this regulation and after having obtained permission in writing from the implementing agency or from their delegate.

## **Regulation on Protection of Old Trees**

The regulation is made under article 04 of EPPA. Article 03 of the regulation lists four categories of trees that can be protected. This includes:

- All trees above 50 years of age
- Unique and threatened species in Maldives in general or in a specific island
- Trees of environmental significance
- Trees of cultural significance

As per article 04 of the regulation all protected trees need to be advertised by the Ministry. The list needs to be updated every 05 years. Article 06 of the regulations states that the boundary of a protected tree is within a 02 meter radius of the tree. Article 05 suggests that trees that are located

within a private boundary are exempted from this regulation. Moreover those trees that are grown for the purpose of agriculture are exempted from this regulation. The regulation also defines responsible parties for maintenance of such trees and also activities like trimming of old branches that can be undertaken for maintenance purpose.

### **Regulation on Migratory Birds (2014/R-126)**

The aim of the regulation is to ensure that the migratory birds and their habitat are protected from damage and destruction. Article 06 of the regulation stipulates that it is prohibited to catch, use as pets, trade of birds or any parts and harm the birds or their nests in anyway. Article 07 of the regulation lists all birds except migratory birds found in the Maldives. The regulation also stipulates that exemptions. In this regard as per article 08, research purpose and incase of spread of disease is identified as exemptions.

### **Protected Area Regulation (2018/R-78)**

The overall aim of the regulation to specify mechanisms to protect, conserve and manage areas designated as protected areas under article 04 of EPPA. Article 05 of the regulation stipulates that for each of the designated protected areas the following information needs to be announced:

- The name of the protected area
- The boundaries of the protected area with GPS coordinates
- Zonation plan of the area
- Activities that can and cannot be undertaken at a particular location
- The designated level of protection
- The reason for protection and the special significance

The regulation identifies 07 levels that could be designated to protected areas (article 06)

- Areas of International Significance
- Strict Nature Reserves
- Wilderness Area
- National Park
- National Monument
- Habitat Species Management Area
- Protected Area with Sustainable Use

A list of all protected areas need to be maintained by EPA and the list needs to be gazette as per article 7. With an agreement in place, as per article 09 management of protected areas can be handed



over to any public or private party. As per article 12 each protected area shall have a management plan in place for the management of the area.

### **Hazardous Chemical Regulation (2019/ R-1057)**

This regulation is implemented by Ministry of Defense. It provides guidance on storage, transport and use of different classes of hazardous chemicals. As per article 03 of the regulation all chemicals other than those listed in Annex 6 of the regulation is considered as hazardous chemicals. As per article 05 of the regulation permit needs to be attained from the Ministry for the purpose of the regulation by submitting completed designated form (<https://www.gov.mv/dv/files/chemical-permit-application-form-final.pdf>),

Article 09 of the regulation provides labelling guidelines for hazardous chemicals. Article 10 provides safety requirements when transporting hazardous chemicals. Article 11 provides provisions for storage and storage warehouse registration. Article 12 stipulates that any hazardous chemical that is imported to Maldives shall be used only for the approved designated purpose. Article 13 stipulates that first aid arrangements shall be available at any location where hazardous chemicals are used.

If the hazardous chemical that was imported to Maldives needs to be disposal special permit needs to be attained from the Ministry as per article 14. Article 18 provides details of fines for non-compliance.

### **Stone, Coral and Sand Mining Regulation**

This regulation addresses sand mining from islands and bird nesting sand bars. Sand and aggregate mining from beaches of any island whether inhabited or uninhabited is banned for protection of the islands. Permissions for sand and aggregate mining from other areas shall be obtained from the relevant authorities.

There is another similar regulation named “Regulation on Coral Mining (1990), which is only applicable to coral mining from the ‘house reef’ of islands and the atoll rim reefs.

### **Land Act**

The 2008 Constitution vests all land in the State and bans foreign ownership of land. It is understood that Government is reviewing land-related legislation to bring it into line with the constitution and current development policy. Meanwhile, matters relating to land are governed by the provisions of the Maldivian Land Act and Regulations of 2002, as subsequently amended.

The Act Empowers Government to allocate land for five purposes:

- The construction of households and buildings for residential purposes;
- For commercial use;
- For social use;
- For environmental protection;
- For government use.

Under the Act, all Maldivian citizens who do not have a place of residence are entitled to a parcel of land for residential purposes, entitled a “state dwelling”. Such parcels are issued by the respective Atoll Office and must not exceed 4,000 ft<sup>2</sup> (372 m<sup>2</sup>). The parcel is forfeit if not developed (“settled”) within five years. State dwellings are heritable and divisible, down to no smaller than 600 ft<sup>2</sup> (56 m<sup>2</sup>).

State dwellings can be privatized by purchase from the government. Conversion to non-residential purposes is possible subject to compliance with land use policy, and a permit. Sales of private land attract a 15% tax.

Buildings, trees and other assets on land belong to the owner of the land or official user of the land, unless third-party ownership can be proven under Shari’ah.

Land for agriculture is allocated to residents by island administrations on an annual renewable basis. The land remains government property. No rent is paid, but the plots are generally small and the system provides little security or incentive to invest in and improve the land. It is understood that the Ministry of Fisheries and agriculture (MoFA) is preparing an Agricultural Land Act to address these issues, with assistance from the UN Food & Agriculture Organization (FAO).

When land is required for public projects, it is understood that the legal owner or registered user is compensated on a land-for-land basis, with fixed assets being paid for at fair market price.

Maldives Land and Survey Authority established in 2011 is responsible to conduct surveys and collect and update information on the most beneficial use of lands, lagoons and reefs of the Maldives, and formulate and implement cadastral survey standards.

## **Decentralization Act**

The final version of the Decentralization Act was passed in April 2010 and was ratified in May 2010. The Decentralization Act provided for the Local Government Authority (LGA) which was established

in late 2010. Under the Decentralization Act Island Councils are accountable to Atoll Councils and Atoll Councils are accountable to the LGA.

The Constitution mandates Councils to provide democratic and accountable governance; foster the social and economic well-being and development of the community; and establish safe, healthy and ecologically diverse environment. The Constitution entitles Councils to a grant from central government and to raise own revenues.

Chapter 4 of the Decentralization Act has direct relevance to the administration of this Project. The Act gives island councils specific powers and responsibility for, amongst other things:

- Administering and developing the island in accordance with the Constitution and statutes and providing municipal services as prescribed in this Act;
- Preparing island development plans in consultation with the community, and submitting the plan to the Atoll Council;
- Implementing development projects planned and assigned by the government in line with the island development plans formulated by islands and submitted to the Atoll Councils;
- Assisting Government Ministries and Atoll Councils in monitoring the progress of various development projects;
- Formulate island level policies necessary to discharge the powers and responsibilities conferred to the island council by this Act and formulate and implement required regulations for the purpose.

Services rendered by the Island Council to the people of the island under this Act include disposing of waste in a reasonably safe manner at the island level so as it does not create any inconvenience to the community. Under this Act the Island Councils have the power to charge a fee or rent in order to obtain funds for the services they provide including for safe disposal of wastes. Such fees to be charged shall be determined in consultation with the people of the area and in accordance with the Laws of Maldives.

Under Chapter 14 of the Act the Island Councils have the power to formulate regulations on matters which fall within their jurisdiction with advice of the Local Government Authority. In addition, with the advice of the Local Government Authority, the city councils, atoll councils, and the island councils have the power to make regulations about waste management and disposal on their islands.

The act has gone a number of revisions the most recent revision occurred in 2019. The key aspects covered in this revision are highlighted below:

- As per the article 69-1 of the act the island and city councils are overall responsible to provide the electricity service in the respective island or city. As per article 69-2 of the same act the council needs to have an agreement with utility service provider for implementation of the service. Under the same article it is stated that this agreement needs to be made as per conditions that are set by a regulation prepared and implemented by the central government. The referred agreements above need to be made within 01 year of enforcement of the act, hence before 15<sup>th</sup> December 2020. Moreover, the act provide opportunity for island and city councils to provide electricity service themselves.

As per article 68 of the act for any development project undertaken in an island consultation needs to be undertaken with the council and other relevant authorities established in the island. The same article also states that any EIA reports developed for any project needs to be shared with the council and information on the impacts and mitigation measures shall be shared with the council.

As per article 107-1 of the act the council shall hold meetings with the public regarding any important development activities undertaken in the island. The same article also specifies that the time and location of the public meeting shall be announced 05 days prior to the meeting.

- As per article 56-6 of the act a Women's Development Committee shall be established. The members of the committee shall be elected based on an election held amongst the women of the community. As per article 56-7 of the act one of the functions of the committee is to give input to the council regarding various development activities undertaken within the island.

## **Heritage Act (12/2019)**

The main objective is to determine the procedure to assign cultural heritage, determine the responsibility of the government and the people regarding cultural heritage, to determine means of

penalizing acts of damaging cultural heritage, to determine means of undertaking research on heritage.

Article 04 of the act defines cultural heritage. In this regard the following can be considered as cultural heritage:

- Movable cultural heritage
- Heritage Monuments and buildings
- Heritage Areas
- Linguistic Heritage

Article 12 of the act suggests that all policy level decisions will be made by the Minister. Article 14 stipulates that National Centre for Cultural Heritage needs to be established, with the prime function of establishing procedures required for setting, categorizing, research, maintaining list of heritage sites, and managing heritage sites.

Fourth Chapter of the act deals with the heritage trust fund, the composition and the functions.

Articles 28 and 29 of the act provides details of the procedure to follow, if any party comes across anything that might be considered as cultural heritage. In this regard, within 48 hours the council needs to be reported and subsequently the council needs to report to national centre within 48 hours of knowing.

Article 36 of the act suggests that impacts on cultural heritage needs to be covered through the Environmental Impact Assessment undertaken for development projects.

#### Construction Site Health and Safety

In addition, the project has established the following procedure that the contractors need to follow with respect to chance find. Given below are the details of the procedure:

If any person discovers a physical cultural resource, such as (but not limited to) archaeological sites, historical sites, remains and objects, or a cemetery and/or individual graves during excavation or construction, the Contractor shall:

1. Stop the construction activities in the area of the chance find;
2. Delineate the discovered site or area;

3. Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be arranged until the responsible authorities take over;
4. Notify the Supervising Officer who in turn will notify the responsible authorities (island councils and National Center for Cultural Heritage) immediately (within 24 hours or less);
5. Responsible authorities are in charge of protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by archeologists.
6. The significance and importance of the findings shall be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values used by the GoM;
7. Decisions on how to handle the finding shall be taken by the responsible authorities. This could include changes in the layout (such as when finding an irremovable remain of cultural or archeological importance) conservation, preservation, restoration and salvage;
8. Implementation for the authority decision concerning the management of the finding shall be communicated in writing by relevant local authorities; and
9. Construction works could resume only after permission is granted from the responsible local authorities concerning safeguard of the physical cultural resource.

# Annex 7: Grievance Redress Mechanism

## Project based Grievance Redress Mechanism

It is the responsibility of the PMU in coordination of the contractor, island councils and the utility, to ensure that the following grievance redress mechanism is established and advertised for the public. The mechanism will address all grievances that arise from the public during project construction and operational phase. This may include public disturbances, accidents that arise due to the project, social conflicts that arise between the public and the workforce and any other matter that is directly related to the project.

The first tier of the grievance mechanism will be the contractor during the construction phase and the utility during the operational phase. The second tier will be the respective island council and the third tier Ministry of Environment.

Each stakeholder will be required to designate a person or person(s) to receive and record all public grievances and the contact details of the designated persons shall be displayed at project site.

The summary of the mechanism with the contact information for each tier of GRM shall be displayed clearly at all work sites, council notice board and utility offices. Moreover, the respective websites shall also provide this information.

The details of the mechanism as highlighted in the Environmental and Social Management Framework of the project are summarized in the table below.

Tiers of Grievance Mechanism	Nodal Person for Contact	Contacts, Communication and Other Facilitation by Project	Timeframe to address grievance
<b>First Tier:</b> Contractor (During Construction phase)  Electricity Service Provider (ESP)	A person designated for the task need to be identified for the purpose by IPP and Electricity Service Provider.	<ul style="list-style-type: none"> <li>In the ESP or IPP or Contractor offices and the project site there will be an Information Board providing details of the Grievance redress mechanism listing the names and contact telephones/emails.</li> </ul>	14 working days

<p>(Utility) (During Operation Phase)</p>		<ul style="list-style-type: none"> <li>• Grievances can be registered by contacting the designated person through phone/email or by submitting a letter of complaint or by filling a Tier-1 complaint form. The Tier-1 form must be available online on the websites of the IPP or ESP or Contractor, Ministry of Environment, Climate Change and Technology(MECT) and from the front office counters of the respective offices. (note PMU of MECT should supply the form to respective parties).</li> <li>• For those who cannot properly write, a staff shall assist in filling the complaint form and get it signed by the aggrieved party.</li> <li>• A formal receipt of the complaint shall be provided to the aggrieved party.</li> <li>• The IPP/ESP/Contractor will screen the grievance to determine whether the grievance is related to ARISE project or not.</li> <li>• If it is related to the project the aggrieved party shall be informed in writing (copied to MECT) how the case will be processed as per this grievance redress mechanism. This</li> </ul>	
---	--	---	--



		<p>shall occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter shall be read to the person in presence of a witness and the witness shall declare their witness to this event.</p> <ul style="list-style-type: none"> <li>• Alternatively, if it is not related to the project the aggrieved party shall be informed that it is not related to the project in writing (copied to MECT) and shall inform how the case will be handled. This communication shall occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter shall be read to the person in presence of a witness and the witness shall declare their witness to this event.</li> <li>• Where the grievance is related to the project, the IPP/ESP/Contractor shall come up with a solution either by (i) discussing internally; (ii) joint problem solving with the aggrieved parties, ME and Island Council or; (iii) a combination of both options.</li> <li>• The IPP/ESP/Contractor shall communicate the final decision in writing, in terms how the grievance was handled to the aggrieved party within 14 working days of receiving the complaint. If the aggrieved party</li> </ul>	
--	--	--	--

		<p>is unable to read (for whatever reason) the issued letter shall be read to the person in presence of a witness and the witness shall declare their witness to this event.</p> <ul style="list-style-type: none"> <li>• The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 10 days.</li> <li>• If no acknowledgement is submitted from the aggrieved party then the decision will be considered as accepted.</li> <li>• If the grievance is not resolved to the satisfaction of the aggrieved party within 14 working days of submission of the grievance to tier 1 then the aggrieved party may notify local council in writing, of the intention to move to tier 2.</li> </ul>	
<p><b>Second Tier:</b> Local Council (Island or City Council or any other party which performs such a function)</p>	<p>Local Council will be the second point of contact. Designated contact persons shall be established within the Council with a designated contact number.</p>	<ul style="list-style-type: none"> <li>• Where the aggrieved party is not happy with the outcome of the decision by the IPP/ESP/contractor or where the aggrieved party is of the view that the contractor/operator is not capable of justly solve the issue or where the grievance is not resolved within 14 working days the grievance can be upgraded to tier 2.</li> </ul>	<p>14 working days</p>

		<ul style="list-style-type: none"> <li>• In the council office and the project site there will be an Information Board providing details of the Grievance redress mechanism listing the names and contact telephones/emails.</li> <li>• Grievances can be registered by contacting the local council directed contact person(s) or by submitting a letter of complaint addressed to the Mayor or Council president or by filling a Tier 2 Complaint Form. The Tier-2 form must be available online on the websites of the Island Council, Ministry of Environment, Climate Change and Technology(MECT) and from the front office counters of the respective offices. (note PMU of MECT shall supply the form to respective parties).</li> <li>• For those who cannot properly write, a staff shall assist in filling the complaint form and get it signed by the aggrieved party.</li> <li>• A formal receipt of the complaint shall be provided to the aggrieved party.</li> <li>• The aggrieved party must submit a copy of the decision from Tier 1 and the letter submitted raising their disagreement to decision where the reason for upgrading to tier 2 is</li> </ul>	
--	--	---	--

		<p>the disagreement with the decision from tier 1.</p> <ul style="list-style-type: none"> <li>• The aggrieved party must submit a copy of the grievance form submitted through tier 1 or the grievance letter submitted to council, where the reason for upgrading to tier 2 is due to lack of response from the IPP/ESP/Contractor.</li> <li>• The council must screen the grievance to determine if the issues and concerns raised in the complaint falls within the mandate of the project.</li> <li>• If it is related to the project council shall inform the aggrieved party in writing (copied to MECT) how the case will be processed as per this grievance redress mechanism. This shall occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter shall be read to the person in presence of a witness and the witness shall declare their witness to this event.</li> <li>• Alternatively, if it is not related to the project the council shall inform the aggrieved party that it is not related to the project in writing (copied to MECT) and shall inform how the case will be handled. This communication shall occur within</li> </ul>	
--	--	--	--

		<p>03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter shall be read to the person in presence of a witness and the witness shall declare their witness to this event.</p> <ul style="list-style-type: none"> <li>• Where the grievance is related to the project, the council shall come up with a solution either by (i) discussing within the council; (ii) joint problem solving with the aggrieved parties, MECT, ESP and the contractor/IPP or; (iii) a combination of both options.</li> <li>• The council shall communicate the final decision in writing, in terms how the grievance was handled to the aggrieved party within 14 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter shall be read to the person in presence of a witness and the witness shall declare their witness to this event.</li> <li>• The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 10 days.</li> <li>• If no acknowledgement is submitted from the aggrieved party</li> </ul>	
--	--	--	--

		<p>then the decision will be considered as accepted.</p> <ul style="list-style-type: none"> <li>• If the grievance is not resolved to the satisfaction of the aggrieved party within 14 working days of submission of the grievance to tier 2 then the aggrieved party may notify MECT, in writing, of the intention to move to tier 3.</li> </ul>	
<p><b>Third Tier:</b> Ministry of Environment, Climate Change and Technology</p>	<p>MECT will forward the grievance to the Project Management Unit (PMU) of the Ministry. A dedicated number shall be allocated to</p>	<ul style="list-style-type: none"> <li>• Where the aggrieved party is not happy with the outcome of the decision by the council or where the aggrieved party is of the view that the council is not capable of justly solve the issue or where the grievance is not resolved within 14 working days the grievance can be upgraded to tier 3.</li> <li>• Grievances can be registered by contacting MECT (directed to the contact person(s) or by submitting a letter of complaint addressed to the Minister of Environment or by filling a Tier 3 complaint form.</li> <li>• For those who cannot properly write, the MECT staff will fill a complaint form and get it signed by the aggrieved party.</li> <li>• A formal receipt of the complaint shall be provided to the aggrieved party.</li> </ul>	<p>14 Working Days</p>

		<ul style="list-style-type: none"> <li>• The aggrieved party must submit a copy of the decision from the council and the letter submitted to council raising their disagreement to decision where the reason for upgrading tier 2 is the disagreement with the council decision.</li> <li>• The aggrieved party must submit a copy of the grievance form submitted to council or the grievance letter submitted to council, where the reason for upgrading to tier 2 is due to lack of response from the council.</li> <li>• Ministry will forward all the grievances related to the project to the Project Management Unit.</li> <li>• PMU will screen the grievance to determine if it is related to the project.</li> <li>• If it is related to the project PMU shall inform the aggrieved party in writing how the case will be processed as per this grievance redress mechanism. This shall occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter shall be read to the person in presence of a witness and the witness shall declare their witness to this event.</li> </ul>	
--	--	--	--

		<ul style="list-style-type: none"> <li>• Alternatively, if it is not related to the project PMU shall inform the aggrieved party that it is not related to the project in writing and shall inform how the case will be handled. This communication shall occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter shall be read to the person in presence of a witness and the witness shall declare their witness to this event.</li> <li>• Where the grievance is related to the project, the PMU shall come up with a solution either by (i) Discussing in the project steering committee; (ii) joint problem solving with the aggrieved parties, the council, Energy Service Provider and the contractor/IPP (iii) undertaking site visits and holding onsite discussions or; (iii) a combination of all these options.</li> <li>• The PMU will be responsible to ensure that there is no cost imposed on the aggrieved person, due to the grievance mechanism at the third tier.</li> <li>• MECT shall communicate the final decision in writing, in terms how the grievance was handled to the aggrieved party within 14 working</li> </ul>	
--	--	---	--



		<p>days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter shall be read to the person in presence of a witness and the witness shall declare their witness to this event.</p> <ul style="list-style-type: none"> <li>• The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 10 days.</li> <li>• If no acknowledgement is submitted from the aggrieved party then the decision will be considered as accepted.</li> </ul>	
--	--	---	--

## Workers' Grievance Redress Mechanism

As per the requirements of the Labour Management Procedure (LMP) a grievance redress mechanism shall exist both for primary workers (i.e. the PMU of the Ministry) and contracted workers. This will be an internal procedure to address internal grievances that arise from the workers of each respective party. A three-tier system is defined below, firstly to direct project workers and followed by that for contracted workers.

### Direct Project Workers

Tiers of Grievance Mechanism	Nodal Person for Contact	Contacts, Communication and Other Facilitation by Project	Timeframe to address grievance
<b>First Tier:</b> Ministry of Environment Climate	Permanent Secretary	Any project staff may raise and submit in writing addressed to permanent secretary identifying the nature of the grievance.	15 working days

Change and Technology		<p>The permanent secretary shall acknowledge the grievance and provide written confirmation of receipt of the grievance.</p> <p>For issues related to sexual harassment the Permanent Secretary shall submit the complaint to sexual harassment committee.</p> <p>For all other grievances the Permanent Secretary may form a committee (comprised of individuals that are not involved in the project), to review the case.</p> <p>The Permanent Secretary may meet with the aggrieved party and other related project staff to collect additional information.</p> <p>The Permanent Secretary will take steps to ensure that aggrieved party is not discriminated due to the complaint.</p> <p>The Permanent Secretary will communicate the decision regarding the grievance in writing within 15 days of receiving the grievance.</p>	
<b>Second Tier:</b> Labour Relations Authority	Designated Employment Officer for the case	<p>If the aggrieved party is not happy with the response from the Permanent Secretary, the party may upgrade the grievance to second tier (i.e. Labour Relations Authority).</p> <p>The aggrieved person may submit the complaint through: <a href="https://lra.gov.mv/submit-a-complaint-form/">https://lra.gov.mv/submit-a-complaint-form/</a></p>	As per the established norms of the Authority
<b>Third Tier:</b> Judiciary	An individual has option of going to established judiciary system of the country	The legal system is accessible to all aggrieved persons.	As per established judicial procedures in Maldives

## Contracted Workers

Tiers of Grievance Mechanism	Nodal Person for Contact	Contacts, Communication and Other Facilitation by Project	Timeframe to address grievance
------------------------------	--------------------------	---	--------------------------------

<b>First Tier: Contractor</b>	Designated person by Contractor/ Investor to specifically look into complaints (if no such person exists within the company can go straight to tier 2)	As per the established system of the investor/contractor and legal requirements of Maldives	As per established norms of the contractor/investor (not exceeding 30 days).
<b>Second Tier: Labour Relations Authority</b>	Designated Employment Officer for the case	If the aggrieved party is not happy with the response from the Contractor/Investor, the party may upgrade the grievance to second tier (i.e. Labour Relations Authority). The aggrieved person may submit the complaint through: <a href="https://lra.gov.mv/submit-a-complaint-form/">https://lra.gov.mv/submit-a-complaint-form/</a>	As per the established norms of the Authority
<b>Third Tier: Judiciary</b>	An individual has the option of going to established judiciary system of the country	The legal system is accessible to all aggrieved persons.	As per established judicial procedures in Maldives

During operational phase of the project the utility will follow the established norms of the utility company with respect to grievance redress mechanism of their work force.