



INSUCO

Local understanding for sustainable solutions

MAURITIUS: RODRIGUES AIRPORT PROJECT (P180266)

Resettlement Action Plan (RAP) AUDIT

Final version

15/06/2023

List of contents

1. Introduction: Project description and rationale.....	4
1.1. Description of the Project	4
1.2. Land-related impacts	4
1.3. RAP legal framework.....	6
1.4. RAP Institutional Framework as of March 2023	7
1.5. Purpose of this audit.....	8
1.6. Methodology	8
2. Project and resettlement chronology	10
3. Gap analysis.....	16
3.1. Analysis per ESS 5 requirements.....	16
3.1.1. <i>Community engagement</i>	16
3.1.2. <i>RAP design and content</i>	19
3.1.3. <i>Physical displacement</i>	22
3.1.4. <i>Economic displacement</i>	25
3.1.5. <i>Mobilization of institutional and administrative resources</i>	28
3.1.6. <i>Planning and implementation</i>	29
3.1.7. <i>Key Issues Identified</i>	30
3.2. Summary of the gap analysis	33
4. Recommendations to fill the gaps and strengthen the RAP implementation.....	46
5. Conclusion	52
Annex 1: Minutes of consultations and interviews carried out for this audit	54
Annex 2: Attendance list of consultations and interviews carried out for this audit	84

List of tables

Table 1 Synthesis of land-related impacts of the Project	5
Table 2 - Indicators used for the RAP audit	9
Table 3 - Summary of resettlement activities carried-out to date	10
Table 4 - Summary of engagement activities with PAPs during resettlement process as of March 2023	16
Table 5 - Summary of the gap analysis and actions required	33
Table 6 : Suggested dashboard for RAP monitoring, to be completed in the RAP	50

List of abbreviations

AFD	Agence Française de Développement
AML	Airports of Mauritius Limited
ARL	Airport of Rodrigues Limited
EPMU	Economic Planning and Monitoring Unit
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standards
PAP	Project Affected Person
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RRA	Rodrigues Regional Assembly
Rs	Mauritius Rupis
SEMPA	South East Marine Protected Area
SEP	Stakeholder Engagement Plan

1. Introduction: Project description and rationale

This document is an audit of the Resettlement Action Plan (RAP) that was commissioned by Rodrigues Regional Assembly to manage the resettlement of people affected by the project of the Rodrigues Airport Extension (the Project).

1.1. Description of the Project

Rodrigues Island is a territory of the Republic of Mauritius, autonomous since October 2012, located about 650 km east of Mauritius. The island, small in size (110 km²), however, is tasked with the development of its economy while preserving cultural values strongly linked to the sectors of agriculture, fishing and tourism. The latter sector has the support of local authorities as part of a sustainable development policy that seeks to grow the reputation of the island both in terms of environmental protection and as an exemplary destination for ecotourism.

Rodrigues, due in particular to its small size, relies upon an economy which remains fragile. The island remains dependent on regular imports by sea, with only a very small proportion of imports arriving by air. As such, the Rodrigues Plaine Corail Airport is currently equipped with a small landing strip of 1,200 m long, which can accommodate aircraft of type ATR 72.

Operational and technical issues related to the length of the runway mean that the airport cannot operate at full capacity. This situation inexorably leads to some pressure on the carriers during peak periods, a higher cost rate application for airline tickets, and an inability to develop viable air cargo sector.

In response to this situation, the government has expressed the wish for the construction of a new runway which will boost the economic and social development of the island. The new runway will be approximately 2,100 m in length x 45 m wide. This new infrastructure would support larger aircraft like the A321 Neo/B737, which carries up to a maximum of 244 passengers and is capable of transporting cargo. With this new configuration, the potential of operating new regional routes will be feasible, which may further enhance the economic growth of the island.

The airport is managed by Airport of Rodrigues Ltd. (ARL), a fully-owned subsidiary of Airports of Mauritius Ltd. (AML). The project to equip Rodrigues with a new and longer airstrip stem from a political will shared by the Rodrigues Regional Assembly (RRA) and the Government of Mauritius to consolidate the economy of Rodrigues in order to facilitate the island's socio-economic development. The goal is to foster economic development while taking steps to ensure that Rodrigues is an exemplary island in terms of sustainability and sustained management of its scarce resources.

The project will be managed by AML, which will establish a Project Implementation Unit (PIU) on Rodrigues Island. AML will be responsible for the implementation of all the project activities, including technical, procurement, FM, M&E, and environment and social safeguard aspects (including citizen engagement). ARL will work closely with this PIU, particularly on issues of construction planning, coordination, and safety oversight, given that they will still be responsible overall for the operation of the airport – which will remain functional during the implementation period.

The resettlement process started in 2018 under the RRA and is still ongoing, however responsibility for completion of the resettlement process will be transferred to AML, with support from ARL.

1.2. Land-related impacts

Local authorities in Rodrigues have carried-out a census and an inventory of communities, structures and activities located on the land required for the Project. These impacts are summarized below.

15 households were physically displaced, which means that the Project requires the relocation of their residential structure. These 15 households accounted for 61 individuals divided into 24 men, 23 women, and 14 children. They all lived in the village of Sainte Marie, and only 5 of them had a formal title to occupy the land. Seventeen residents bred livestock (13) and/or cultivated crops (10), including some residents who did both activities;

Additionally, the Project impacted the livelihood of several individuals not living in the area requiring relocation but who practiced fishing, agriculture and tourism in that zone. These are divided as follows:

- 4 fisheries, which represents 25 individuals, all male in Pointe Corail and Bangelique. The fishery located in Pointe Corail was not located within the Project area but had to be relocated for security purposes. None of them had a formal right to occupy the land;
- 1 individual who owned a boat house used to bring tourists on nearby islands;
- 11 individuals practiced agriculture and/or livestock breeding in Sainte Marie and Bangelique, divided into 8 males and 3 females. The land impacted amounted to less than 1 ha (9970 m²). Livestock breeding involved cattle, small ruminants and poultry.

The government-owned land allocated for the project for the fifteen households requiring replacement houses totaled 10,590 m² with average plot sizes increasing from around 405 m² at their previous location to around 705 m² for their new plots, and all received larger new houses than the ones they had been living in. Land allocated for farming activities totaled around 40,600 m² with all residents receiving larger farming plots than they had used previously. Land allocated for fishing gear storage structures for non-resident fishers totaled 5478 m².

In all 61 residents in 15 households were physically displaced, losing household structures and land, and were resettled. In addition, 17 of these households faced economic displacement for loss of land used for livestock raising, agriculture or both activities.

A total of 37 non-resident users of sites within the impacted zones faced economic displacement, including loss of physical access to their structures (4 sheds supporting 25 fishers, and 1 tourism operator and his boathouse) while 11 lost access to land used for agriculture and livestock breeding.

Table 1 Synthesis of land-related impacts of the Project

Impact	Impacted activity	No. of impacted individuals
1 Physical displacement		
A Loss of structure	Residential (resident PAPs)	61 residents (in 15 households)
	Fishing sheds (non-resident users of land in affected zone)	25 non-resident fishers (using 4 sheds)
	Tourism boat house (non-resident user of land in affected zone)	1 non-resident tourism operator (using 1 boathouse)
B Loss of land	Agriculture and/or livestock breeding	17 residents 11 non-residents
C Total PAPs losing structures, land, or land access	Housing, fishing, tourism, agriculture, and livestock raising	61 residents 37 non-residents
2 Economic displacement		
A Loss of economic activity	Fishing	25 non-resident fishers
B Loss of economic activity	Tourism	1 non-resident tourism operator
C Loss of economic activity	Agriculture and/or livestock breeding	17 residents 11 non-residents

D	Total PAPs facing economic displacement	Fishing, tourism, agriculture and livestock raising	17 residents 37 non-residents
----------	---	---	----------------------------------

It should be noted that this table addresses only the individuals and households displaced by the Project. The community where the households of Saint Marie were relocated are considered as affected by the Project and were consulted accordingly, but they do not lose an asset because of the Project development.

1.3. RAP legal framework

The RAP is mainly based on the domestic legal framework regulating land acquisition, namely the State Lands Act No. 63 of 1945, as amended by Act 48 of 1991. It is also indirectly designed as per World Bank Environmental and Social Standard (ESS) 5. Indeed, the French Development Agency, which initially planned to finance the Project, uses World Bank ESS to manage environmental and social impacts, including ESS 5 for resettlement. Therefore, even though the Bank was not involved in the project at this earlier stage, the administrative agency in charge of designing the RAP implicitly relied on ESS 5.

According to Section 54 of the Rodrigues Regional Assembly Act 2001, any land or other property which was formerly under the jurisdiction of the Government of Mauritius (post Autonomy of Rodrigues) is, under the State Lands Act, transferred to the RRA.

90% of the land in Rodrigues is State land against 10% which is private land. As it is the domain under the management of the State, leases are issued for residential, commercial/industrial or agricultural use. The duration of a residential lease only is 60 years and in return the person pays an annuity to the RRA varying from Rs 100 to Rs 1000 on average per year (depending on the salary of the beneficiary). The land remains the property of the RRA but any property on the land belongs to the beneficiary of the lease. Once the 60-year term of the lease has passed, the lease is usually renewed if the person is still alive. Otherwise, the lease is transferred to the name of child or spouse. Security of tenure is thus provided through government provision of renewable 60-year leases (under law and longstanding practice) for persons or households occupying State land, which makes up the majority (90%) of land on Rodrigues Island.

The law does not recognize rights to informal occupants, also named squatters, but allows for some form of support. According to the State land act 21 of 1982, informal occupants should be notified of the necessity to vacate the land, and may face imprisonment if he or she fails to do so. Upon vacation of the occupied land, any structure erected on it is demolished. The section 22-9 of the Act states that the materials that are still in good or usable conditions should be collected by the State and returned to the squatter upon the payment of a sum to recover the expenses induced by the demolition. Finally, the damage resulting from the demolition of the illegally built structure cannot give rights to actions against the Minister or the authority carrying out the eviction, which indicates that informal occupants are not eligible to compensation (Section 22-11). Despite this strict procedure, the State land Act allows the Minister to regularize squatters by the grant of a building lease over the occupied site or another site for a limited cost, depending on the occupiers' resources (Section 28).

For agricultural uses (livestock and plantations), the RRA issues the beneficiary an agricultural permit for a period of 5 years, renewable, thus giving the holder the right to exploit the land during this period.

The RAP states that the Land Acquisition Act No.54 of 1973 has not been used to carry out the resettlement in this case, preferring a more social and inclusive approach than the one prescribed in the Mauritius legal system. While residents and non-resident users of the land to be acquired by the project were informed of the pending resettlement action prior to a census and asset survey being carried out in August 2018, it does not appear that there was ever a formal or public announcement of a cut-off date prohibiting future improvements to the PAPs' properties.

World Bank ESS 5 deals with land acquisition, restrictions on land use and involuntary resettlement. Its main principles are the following:

- The project shall be designed in a way to avoid involuntary resettlement;

- Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented;
- Project affected persons shall receive a compensation for the loss of assets at market value and replacement cost;
- In case the displacement involves impacts economic activities and livelihood, affected persons will be eligible to livelihood restoration activities.

Overall, Mauritius' legal framework is not aligned with ESS 5 requirements. Whereas it is aligned with the requirement to pay a compensation at replacement cost and market value for loss of property and opportunity, the gaps are the following:

- The Land Acquisition Act does not require to limit expropriation operations at the strict minimum;
- Only formal occupants are entitled to compensation whereas informal occupants, also named "squatters", are not eligible to resettlement (only upon a decision from the Minister);
- General requirements to restore livelihood in the Planning and Development Act.
- No requirement for public consultation or engagement with impacted communities prior decision to expropriate; nor a declaration of a formal cut-off date, after which subsequent PAP investments will not be provided for in compensation calculations
- No grievance mechanism required, only judicial remedy;
- Compensation in kind only offered for land, not for structures;
- No requirement to elaborate a RAP;
- No specific measures for vulnerable groups.
- No apparent formal mechanism for monitoring and evaluation of the resettlement process itself and its outcomes for PAPs under the existing legal framework, however specific institutional mechanisms were set up for implementation of this project's RAP as noted in Section 1.4.

1.4. RAP Institutional Framework as of March 2023

The planning and the implementation of the initial RAP relied on already established administrative units and on administrative bodies created afterward specifically for the RAP by RRA. More specifically, a Steering Committee and the Economic Planning and Monitoring Unit (EPMU) were created specifically for managing the RAP planning and implementation.

The RRA is the administrative body that has initiated the RAP. The Rodrigues Regional Assembly consists of 17 members whose current distribution is 10 elected representatives of the Government and 7 elected representatives of the opposition.

The Commissions of the Executive Council: The Executive Council of Rodrigues consists of 7 Commissioners who take over the management of various commissions or offices in charge of the various social, economic and environmental activities of the island. For this RAP, the Commission on Agriculture and the Commission on Fishing were mostly involved with evaluating impacted assets such as trees, crops and fisheries, and were in charge of formalizing the situation of PAPs after their relocation through the delivery of agricultural and fishing licenses.

The Cadaster Office of the Land Commission: this Commission is under the authority of the Chief Commissioner. It was involved in identifying the impacted PAPs, proposing relocation sites, and formalizing leases of sites selected for relocation.

The Steering Committee: it is composed of the Chief Commissioner, a representative of the Land and Civil Aviation Commission, the Commission on Agriculture, the Commission on Environment, Fishing and Forest, the Commission on Housing, and the Commission on Natural Resources, Water and Public Utilities. The Committee was directed by the Island Chief Executive, who is the Secretary of the Executive and whose mission is to ensure the implementation of all the measures taken at the meetings of the Executive Committee by each of the Commissioners. As per the RAP, the Steering Committee was essentially in charge of planning the RAP and engaging with PAPs to define the compensation value, modalities, and for following-up the relocation. However, it is stated further in the RAP that once consultations were over, the EPMU would take over to liaise with contractors and PAP.

The Economic Planning and Monitoring Unit : the EPMU was created as the focal point to liaise PAPs with the administration and contractors. The EPMU takes over the role of the Steering Committee. Additionally, the EPMU was in charge of defining compensation packages for PAP. It also included a helpdesk to liaise with PAP.

This current institutional framework does not ensure the involvement of AML or ARL in the RAP implementation, and is largely dependent on political cycles and interests not immediately related to the Project. This therefore does not allow for an optimum implementation, particularly regarding the RAP follow-up. Further details and recommendations are provided in the Section 3.1.7 in this regard.

1.5. Purpose of this audit

AML seeks the financing of the Project by the World Bank. The lending decision is conditioned by the conformity of the resettlement activities to World Bank standards. Therefore, the purpose of this audit is twofold:

- Identify and highlight any gap with ESS 5 requirements, notably red flags. Indeed, it is necessary to identify issues that could lead to a decision to not finance the Project unless corrective measures are adopted;
- Define necessary corrective measures to ensure that the RAP is implemented in line with ESS 5 requirements.

Based on a review of the RAP, the following themes were considered as key issues to be investigated:

- Due consideration for vulnerable groups;
- Grievance management;
- Livelihood restoration;
- Tenure security;
- RAP follow-up and implementation.

1.6. Methodology

The RAP audit was carried out between February and March 2023 with assistance from representatives from AML and ARL following a methodology that includes three elements detailed below. A field mission from March 13th to 26th 2023 took place to complete the documentation review.

■ A desktop review of the RAP provided by AML/ARL

This review allowed to check whether the underlying principles of the RAP and the approach are consistent with ESS 5. This allowed to identify key aspects to be investigated during a field mission and to prepare the relevant tools and indicators. The consultant has asked for additional documentation such as complaints registered, but these have not been communicated by relevant authorities during the audit writing. The table below details the indicators for each theme.

■ Site visit

A site visit took place to observe the evolution of the RAP implementation, notably the residential structures built and access to basic services, the development of land for agriculture and grazing, and the structures for fisheries.

■ Interviews and consultations

Interviews with PAPs and key informants took place to confirm, detail and document issues that remain unclear from the RAP drafted in 2021. PAPs were questioned on the amount of compensation determined by the Steering Committee and whether the compensations were paid. The interview also featured questions on the satisfaction regarding the implementation of the RAP, their engagement, eligibility criteria, the compensation amount, the effectiveness of the grievance management mechanism and whether their livelihood status had been improved or not. Interviews with government agencies sought to highlight challenges and successes met in the RAP implementation.

The minutes of these consultations and interviews and included in the Annex 1 of this audit.

Table 2 - Indicators used for the RAP audit

Issue	Key indicators
Grievance management	<ol style="list-style-type: none"> 1. No. of grievances reported 2. Types of categories for grievances and complaints 3. No. of grievances in each category resolved 4. No. of grievances in each category to be resolved 5. No. of compensation related grievances to be resolved 6. Average time required to solve a grievance
Livelihood restoration	<ol style="list-style-type: none"> 1. No. of Livelihood restoration activities prepared for PAPs 2. No. of livelihood restoration activities implemented 3. No. of livelihood restoration activities to be implemented 4. Reasons for not implementing a livelihood restoration activity 5. No. of PAPs who received specific support because of vulnerability 6. Steps followed in monitoring livelihood restoration outcomes
Tenure security	<ol style="list-style-type: none"> 1. No. of forced eviction 2. No. of PAPs without secured lease 3. No. of PAPs who did not receive their compensation
RAP follow-up and implementation and RAP implementation	<ol style="list-style-type: none"> 1. No. of follow-up and monitoring activities carried out 2. Types of indicators defined for follow-up 3. No. of corrective measures adopted 4. No. of PAPs not satisfied with relocation 5. No. of PAPs not satisfied with livelihood restoration activities and results
Inclusiveness of the RAP	<ol style="list-style-type: none"> 1. Types of vulnerability criteria identified 2. No. of PAPs defined as vulnerable 3. No. of engagement activities with vulnerable groups 4. No. of activities supporting vulnerable groups 5. No. of women who participated in stakeholder engagement activities

2. Project and resettlement chronology

Since its inception in 2016, the Project has gone through changes in its design and financing. In 2019, the Project considered financing from the EIB and the French Development Agency (AFD). In this framework, an Environmental and Social Impact Assessment (ESIA) was carried out by Setec/Enviro Consult/Insuco to assess environmental and social impacts induced by the Project and propose relevant mitigation measures. In 2023, the Project sought World Bank financing. In the meantime, the Project's design is being updated by the Design contractor.

Despite the evolution of the Project's financing and design, and independently of the ESIA mission that was carried out in 2019, the RRA undertook the resettlement of physically displaced households and the compensation of economically displaced economic operators. The resettlement was carried out because of AFD environmental and social requirements, which explicitly refer to World Bank Environmental and Social Standards (ESS). These activities started as early as 2018 and are still ongoing. This section summarizes the activities carried out to date, and the remaining activities to be done.

To manage the resettlement, the RRA developed a RAP for the resettlement of residents and non-residents users of land in Sainte Marie, Bangelique and Pointe Corail that was finalized in 2021. The RAP implementation can be broadly split into 4 phases, summarized in the table below.

The first stage of the RAP was the planning phase, which took place from June to September 2018. This phase includes the establishment of administrative bodies in charge of the resettlement, namely the Steering Committee composed of relevant administrative bodies and stakeholders, and resettlement units within local departments. This phase also included a preliminary census, the drafting of a preliminary report for the Cadaster Office and the Commission on Agriculture, and public consultations with impacted persons (inhabitants of Sainte Marie and stakeholders having an economic activity in the zone). Public consultations were carried out, aimed at presenting the resettlement objectives and activities, identifying relocation sites, and collecting grievances.

The second phase consisted in the census and inventory of impacted individuals and assets, which took place in August and September 2018. A result of the census and inventory was presented to the Commissions.

The third phase aimed at defining the compensation calculation and modalities, which took place from September 2018 to May 2019. During this phase, PAPs were proposed to choose between a monetary compensation calculated by the Government Valuer and a resettlement in new houses. Moreover, PAPs who lost fisheries were also proposed to choose between compensation in kind or in cash. PAPs were consulted on the type of compensation and the localization of relocation sites. All PAPs agreed to the option of compensation of their residential structures through replacement housing.

The fourth phase consisted in the validation of compensation by PAPs and the implementation of resettlement activities, such as the construction of new residential structures and fisheries. This phase took place from May 2019 and is still ongoing. During this phase, PAPs could express their wishes on new structures to be built (amendment to the initial plans), construction contractors were selected and the PAPs, the RRA and the contractors eventually signed a tri-partite agreement. During this phase, the RRA decided to create a committee, the Economic Planning and Monitoring Unit, to manage the implementation of the RAP. The EMPU would be the main interface for stakeholders to communicate about the RAP implementation. This phase also included a follow-up of the process and a monitoring of the quality of the construction carried out.

Table 3 Summary of resettlement activities carried-out to date

Stage	Activity	Status	Timeframe
Planning	Creation of the Steering Committee	Completed	June 2018

Stage	Activity	Status	Timeframe
	Preliminary census of PAPs and inventory of assets	Completed	June 2018
	Public consultation with PAPs to present the resettlement plan and potential sites for relocation	Completed	July 2018
	Meeting with physically displaced PAPs to collect grievances and choices for compensation	Completed	August 2018
	Development of a schedule for resettlement and communication of the census and inventory date	Completed	August 2018
Census and inventory	Census and inventory of impacted individuals and assets	Completed	August 2018
Definition of compensation modalities	Visit of relocation sites with Commissioners and the Steering Committee	Completed	September 2018
	Consultation of PAPs with Island Chief Executive	Completed	September 2018
	Individual meeting with PAPs to decide about their residential lot and discuss a draft of compensation contract	Completed	November 2018
	Submission to the Cadaster	Completed	November 2018

Stage	Activity	Status	Timeframe
	Office of the selected sites and proposed compensation contracts		
	Consultation with PAPs to discuss further the compensation contracts	Completed	January 2019
	Proposition of a compensation scheme for owners of crops	Completed	February 2019
	Proposal to fishermen of a compensation scheme	Completed	June 2019
	Submission to physically displaced PAPs of the valuation report developed by the Government Valuation Office	Completed	March 2019
	Submission of reports on the inventory of crops and fisheries	Completed	March 2019
	Consultation with impacted fisheries about the choice (compensation in kind or in cash)	Completed	April 2019
	Consultation with PAPs about the resettlement options	Completed	April 2019
	Submission of a development plan for fisheries	Completed	June 2019
Implementation	Signature of compensation contracts for physically and	Completed	May 2019

Stage	Activity	Status	Timeframe
	economically displaced PAPs		
	Follow-up meeting by the Steering Committee	Completed	June 2019
	Submission of the final development plan for housing and fisheries	Completed	July 2019
	Selection of construction contractors	Completed	June 2019
	Meeting with PAPs regarding further steps of the relocation	Completed	July 2019
	Meeting with PAPs, the RRA and contractors	Completed	July 2019
	Signature of tri-partite agreements on the construction of housing and fisheries	Completed	August 2019
	Construction of houses (length: 1.5 year)		
	Agreement on additional works as per PAPs' request	Completed	January 2021
	Delivery of replacement housing to all PAPs but one household (the last household moved in on January 2023).	Completed	December 2021
	Setting up of a negotiation committee to discuss an appropriate compensation scheme for fishermen since	Completed	August 2020

Stage	Activity	Status	Timeframe
	not all agreed on the proposed relocation site		
	Selection of a site for two fishing warehouses and construction	Completed	May 2021
	Connection to water, landline and energy networks for new houses. Access to road network pending.	On-going	November 2020
	Meeting with fishermen prior relocation	Completed	April 2021
	Meeting with PAPs practicing agriculture	Completed	June 2021
	Signature of a tri-partite agreement between the RRA, PAPs practicing agriculture and construction contractors	Completed	October 2021
	Construction works of agricultural lands	Not completed	November 2021
	Delivery of the fishing warehouses	Not completed (only 1 out of 2)	2022
	Delivery of agricultural licenses	Not completed	2022

As of March 24th 2023 and according to the RRA administration, the RAP has been completed at 71%. The remaining activities for the RAP implementation are the following:

- The resettlement of 2 households to be impacted by the construction of the control tower and the firefighter station. These are recently identified households which have not yet had a census or asset survey and are not included in the original RAP numbers;
- The compensation for impacted crops and trees, as well as the payment of a compensation for moral damage (which was promised orally but not included in contracts according to PAPs);
- The delivery of residential leases;
- The development and lighting of track-roads serving the relocation housing;

- The development of livestock breeding fenced areas, which are not ready and available for all impacted individuals;
- The preparation and development of agricultural land, and the delivery of agricultural licenses;
- The construction of a warehouse for a fishery has not been completed since no agreement was found in relation to the location of this warehouse;
- The finalization of fisheries structures, notably the development of the road, tap water and electricity;
- The support for off-lagoon fishing to fishermen who gave-up their fishing licenses;
- The establishment of the follow-up and monitoring procedures for physically and economically displaced individuals.

3. Gap analysis

3.1. Analysis per ESS 5 requirements

This RAP is structured as follows:

- A socioeconomic description of the PAPs;
- The applicable legal framework;
- The methodology used to evaluate impacted assets and the proposed compensations;
- The process for identifying and selecting relocation sites; and
- A planning and a budget.

Additionally, the Annexes provides a list of PAPs, the report from the Government valuation office that defines the amount of monetary compensation, the methodology to value trees, crops and structures, and an execution calendar.

This section assesses the measures provided or implemented within the RAP against ESS 5 requirements.

The audit was carried out to identify if there are significant gaps, minor gaps or no gaps with ESS 5:

- Significant gaps are defined as issues that require specific attention from the World Bank and corrective measures that must be implemented rapidly to ensure compliance with ESS 5.
- Minor gap results from procedure or substantial issues that do not require urgent corrective action and that has a limited impact on PAP's level of life and livelihood.
- No gap refers to a condition when the principles, procedures or activities implemented within the RAP, or the content of the report, comply with requirements set in the ESS 5.

3.1.1. Community engagement

3.1.1.1. Stakeholder engagement activities

The ESS 5 requires the project promoter to engage with affected communities, including host communities (ESS 5 §17).

In the case of the Project, the RRA has interacted on a regular basis with impacted populations in different ways during the planning and implementation of the RAP. For an efficient engagement, the RRA set-up a help desk through a phone number that was communicated to all impacted individuals. The phone number was defined by the RRA as an efficient channel since all the households have a mobile phone or land line. Additionally, residents of Sainte Marie were informed about the Project, considered sites for relocation, and to discuss the choices for compensation during public consultations. Individual meetings were held also to confirm the choice for compensation, that were formalized in writing later. These consultations took place regularly during the planning phase of the RAP. Moreover, PAPs were formally informed of the starting and closing date of the census in writing. Similar activities took place for occupants of fisheries, agricultural and grazing land.

A summary of engagement activities is available in the table below.

Table 4: Summary of engagement activities with PAPs during resettlement process as of March 2023

Date	Attending Stakeholders	Issues discussed
25 June, 2018	Island Chief Executive Rodrigues Executive Council	Plan the resettlement and establish a steering committee composed of representatives of the various government entities and other stakeholders involved in the resettlement

13 July, 2018	Rodrigues Executive Council Villagers of Sainte Marie and other impacted Project affected people (PAPs)	Provide information about the Project, the need for relocation of homes in the impacted area and the support to those impacted individuals
9 August, 2018	Steering Committee PAPs	Collect PAPs' grievances and their choices or preference for the type of support procedures (compensation or relocation).
20 August, 2018	In written form	Communication of the dates of beginning and closing of the census in writing
12 September, 2018	Commissioners, Steering Committee, physically displaced PAPs	Visit of proposed residential relocation sites.
27 September, 2018	Rodrigues Executive Council Physically displaced PAPs	Negotiation on the relocation site
22 November, 2018	Rodrigues Executive Council Physically displaced PAPs	Visit of alternative proposed sites to PAP who disagreed with the first proposition; Presentation to all the villagers of Sainte Marie of a draft of the agreement documents for resettlement
2 April, 2019	In written form	Letter informing each household about the monetary compensation proposed following the Government Valuation Officers mission
11 April, 2019	Rodrigues Executive Council Economically displaced PAPs	Explanation of the support program planned
10 April, 2019	Rodrigues Executive Council Physically displaced PAPs	Individual meeting to collect information about compensation choices
1 – 17 April, 2019	Rodrigues Executive Council PAPs	Consultation on impacts, fears and expectations, carried-out by Insuco
23 April, 2019	Rodrigues Executive Council Economically displaced PAPs	Visit of proposed sites for the relocation of fisheries
9-13 May, 2019	Steering Committee PAP	Signature of relocation contracts
4 July, 2019	Rodrigues Executive Council PAPs	Meeting with PAP to explain the next steps

15 July, 2019	Rodrigues Executive Council PAPs Contractors selected for structures construction	Meeting with PAP and contractors to explain the contract conditions and work specification
29 August, 2019	Rodrigues Executive Council PAPs Contractors selected for structures construction	Signature of tri-partite contracts
August 2020	Rodrigues Executive Council Owners of impacted fisheries	Setting-up of a negotiation committee
October 2020 to October 2021	Rodrigues Executive Council Owners of impacted fisheries	Negotiation on compensations
April 2021	Rodrigues Executive Council PAPs	Meeting with PAPs prior to resettlement

Stakeholder Consultations Undertaken as part of the 2023 RAP Audit

14 and 18 March 2023	Villagers of Plaine Corail	Discussion on stakeholder engagement activities and resettlement issues
15 to 24 March 2023	Residents of Plaine Corail Non-residents impacted by the Project (livestock breeders, fishermen and farmers)	Interview with each of the resettled head of households and their spouse; Interview and consultation with impacted fishermen and livestock breeders, including those who accepted the resettlement of their activity, those who are not resettled yet, and the fishermen who accepted to give-up their fishing license
22 March 2023	Residents of Cascade Jean Louis	Discussion on the Project's impacts, notably on livestock breeding, and stakeholder engagement activity
23 March 2023	Focus group with women in Dans Coco	Discussion on the Project's impacts, their livelihood, challenges they face in their economic activities, and stakeholder engagement.

It should be noted that the host community in Plain Corail has not been consulted regarding the resettlement of the Sainte Marie community in their village. However, the information collected for the ESIA drafted in 2019 indicates that the relocation would not be a concern for them. This ESIA also identified potential conflicts regarding livestock breeding since inhabitants of Plaine Corail are used to enclosing livestock whereas in Sainte Marie, letting livestock roam freely is more common. This potential conflict did not materialize since Sainte Marie's livestock breeders have not yet brought their animals to Plaine Corail, and the RRA has planned to provide them with dedicated fenced spaces for breeding. This lack of engagement of host communities constitutes a gap given the lack of engagement with host communities despite inhabitants of Plaine Corail agreeing with hosting the resettlement of Sainte Marie.

Additionally, during consultations, PAPs mentioned that they were not satisfied with the engagement for the development of livelihood restoration activities, notably from the side of the contractor in charge of

fencing livestock breeding areas and building animals' shelters. For instance, some PAPs breeding simultaneously pigs, poultry and small ruminants were not provided a structure divided into 3 or 4 sections as they owned before. The administration required PAPs to build shelters to breed only one type of animal for biosecurity reasons, but PAPs were not informed about this reason, which created the impression that their needs were not considered in the design of the structures.

Therefore, this lack of engagement is considered as a significant gap.

Finally, the ESS 5 requires ensuring that members of vulnerable groups are given an opportunity to be consulted. The RAP and the ESIA drafted in 2019 indicate that women do not face issue to express their opinion during meetings and interviews, and therefore no specific measures were adopted. Although during the audit field mission, women expressed their views freely, whether the questions were asked specifically to women, men or to the entire household, it is necessary to ensure that dedicated engagement activities are implemented for women in the RAP implementation follow-up and further resettlement activities induced by the Project. On this respect, therefore, a significant gap was identified.

3.1.1.2. Grievance Management

ESS 5 requires a project to ensure that a grievance management is in place as early as to address specific concerns about compensation, relocation or livelihood restoration measures raised by displaced persons (or others) in a timely manner (ESS 5 §19).

The RAP includes a specific section on grievance management. It states that a helpdesk was set-up to ensure that PAPs could communicate their grievance and complaints regarding the Project to the ARR. A public officer within the Office of the Chief Commissioner was designated as the focal point for this purpose. Once the planning phase was over, the EPMU was designated as the main focal point to liaise between the Project and other stakeholders. The RAP however does not refer to any grievance that was made during the RAP planning and implementation phase. The EPMU could not be reached and could not provide the registered grievances as it seems that no apparent grievance register or reporting system was kept. It is therefore not possible to evaluate the number of grievances registered, their types, nor the time required to solve them.

This information suggests that there is no mechanism and grievances are not addressed according to a structured process. This is confirmed by the fact that ARL Manager has stated that there is no grievance management system in place and that neither AML or ARL has received complaints so far.

The lack of grievance management mechanism is a significant gap with ESS 5 requirements.

3.1.2. RAP design and content

In the case of physical displacement, World Bank ESS 5 requires developing a plan that covers, at a minimum, the applicable requirements of this ESS regardless of the number of people affected. The detail of the content of the plan are detailed in the following sub-sections.

As explained earlier in this report, the RRA has commissioned the development of a resettlement Action Plan to manage the Project's impacts related to land-use. This section assesses whether the RAP commissioned by RRA includes ESS 5 requirements.

3.1.2.1. Necessity to develop a RAP

■ Cut-off date

ESS 5 requires establishing a cutoff date for eligibility to compensation and livelihood restoration activities. The information regarding the cut-off date should be documented and communicated in the Project area in appropriate forms to ensure that communities are aware of the process and its implications.

In the case of the Project, the RAP indicates that a census of affected households and individuals and an inventory of the assets impacted allowed to define the type of displacement (economic or physical) and its scale (surface of land impacted or access to livelihood restricted). Additionally, the RRA communicated to PAPs the date for launching and closing the census.

Nevertheless, no cut-off date was communicated to PAPs, which can lead to eligibility claims including opportunistic claims. In practice, given the limited number of PAPs and the proximity between communities and authorities, the risk of eligibility claims remain quasi non-existent. Since the resettlement has already happened and that the number of individuals affected is limited, this procedural requirement has a limited impact on the conformity of the RAP with ESS 5. During future resettlement activities within this RAP or a separate RAP, a cut-off date shall be communicated to PAPs to avoid any risk of eligibility claim and ensure full compliance with ESS 5.

This is considered as a minor gap.

■ Information on the project

As per ESS 5, the RAP should provide basic information on the Project and the scale of its impacts (ESS 5 Annex 1§4).

The RAP commissioned by the RRA does not include a description of the Project nor a description of its impacts.

The information collected during the ESIA indicates that PAPs had a good knowledge of the Project and its impacts. Therefore, this is considered as a minor gap which does not affect the implementation of the Project.

Nevertheless, to align with ESS 5 requirements and ensure PAPs have a good knowledge of the Project, the RAP should be amended and include a Project description.

■ Information on impacted population

According to ESS 5, the RAP shall include a description of the socioeconomic situation of the impacted population prior resettlement (ESS 5 Annex 1 §6). This socioeconomic baseline allows to understand the PAPs' livelihoods and access to basic services such as water, electricity and transportation. In turn, this allows to design a RAP and livelihood restoration activities that align with PAP's conditions, and it allows to later measure the evolution of PAP's conditions once the RAP is implemented.

The RAP starts with a description of the socioeconomic conditions of the impacted population. This description is based on a census carried out in 2018 at the planning stage of the RAP, completed by data collected during the ESIA of 2019. However, the following issues have been identified:

- The RAP does not include figures on the PAPs' incomes, notably because the PAPs did not want to disclose this information to the local administration;
- The RAP discloses the name of individual PAPs and information such as the value of their replacement structures, which should not be the case in a RAP which is intended to be publicly disclosed.

Therefore, a minor gap has been identified on this matter.

The revised version of the RAP will have to include data on range of incomes on PAPs as a group. This information is useful to compare the level of income after the implementation of livelihood restoration activities, and therefore to understand the efficiency and relevance of livelihood restoration measures.

■ Vulnerability issues

The World Bank pays a particular attention to vulnerable groups. In project development, the ESS 5 requires ensuring that vulnerable groups are well informed and given an opportunity to participate in the RAP planning and implementation (ESS 5 Annex 1 §6). ESS 5 also requires ensuring that these groups are provided specific support tailored to their needs and conditions. Vulnerability is defined as a limited resilience and capacity to adapt to external changes and chocs created by a project, which is generally the result of their difficulty to access productive assets or change their economic activity. Although vulnerability depends on the context and a combination of factor, women, youth, elder, poor and people with disability face more difficulties to adapt to chocs and they are therefore more likely to be vulnerable.

The RAP does not consider vulnerability issue in the resettlement planning and implementation. This issue is difficult to frame since the community itself do not see specific criteria that would disadvantage some households over others regarding the resettlement. Nevertheless, the field mission has allowed to identify special needs that are not necessarily considered as a vulnerability factor from a social or economic point of view. For instance, the field mission carried out in March 2023 has allowed to identify

a household with special needs. The wife of the head of household requires proximity because of her health status. The head of household did not receive a livestock breeding and agricultural land at immediate proximity to provide support to his wife when needed despite his request. However, the RAP considers specific support for households without formal property title and seeks to ensure that all resettled PAPs have access to basic services and live in adequate conditions.

This lack of consideration for vulnerability issues is therefore considered as a significant gap since the social approach taken by RRA for its RAP has not sufficiently ensured specific support to vulnerable households.

■ Legal standards

As per ESS 5, the RAP must define the applicable legal framework and standards (ESS 5 Annex 1 §7).

The RAP refers to the State Lands Act and the Land Acquisition Act, which are Mauritius' key legislation in relation to land management and expropriation for public purpose. Since Mauritius' legal framework does not provide compensation for people informally or illegally occupying land, the RAP explicitly discarded the strict application of Mauritius' legislation to favor “a more social approach” to resettlement. Instead of strictly implementing legal provisions and evicting informal occupants without compensation for housing, livestock breeding shelters and fisheries, local authorities proposed a relocation scheme with replacement structures and provision of formal occupation titles, in the form of leases.

The provisions of Mauritius' legal framework on the eviction of illegal occupiers of public land contravene World Bank ESS 5 as explained in section 1.3. The implemented approach aligns with ESS 5 on this matter.

Although the RAP refers to the national legal framework, it should also refer to ESS 5 for all aspects where the national legal framework does not align with ESS 5 provisions. Therefore, a minor gap has been identified on this matter.

■ Compensation evaluation

According to ESS 5, the RAP must explain a clear and consistent methodology to define compensations. This methodology shall detail the proposed types and levels of compensation for various assets impacted such as land, infrastructures, structures, access to natural resources, how replacement cost is achieved, and when necessary additional measures to replace them (ESS 5 §13 and ESS 5 Annex 1 §10).

The RAP commissioned by the RRA includes a dedicated section on property evaluation and compensation. PAPs were proposed to choose between compensation in kind through a relocation in newly built houses and structures for their boat, and a monetary compensation. The monetary compensation was carried out by 4 independent officers of the Government Valuation Office who were present for 8 days in February 2019. These officers proceeded to the valuation at market value as per a methodology that was not necessarily disclosed to the RRA and PAPs during field visit. The valuation of crops and trees was carried out by the Commission on Agriculture. As a result, the PAPs were proposed a monetary compensation that amounted to the market value of buildings, and the value of structures used for livestock breeding. The result of the mission of the Government Valuation Office is attached to the Annex of the RAP, as well as the detail of the compensation calculated for each PAP.

As of April 3rd, the RRA's EPMU has not been in a position to answer whether the compensation was valued at replacement cost. The RAP states that the assets were valued at market rate, but this is not clear regarding other costs incurred by the relocation, such as transaction costs, restoration of access to water and electricity, removal costs, etc.

According to data collected during the field mission, PAPs have not received a compensation for the lost crops, including the loss of perennial crops. Indeed, the RRA has carried out an inventory of crops impacted in 2019, but no compensation proposal has followed. As of March 2023, the current administration is not aware of such compensation scheme and no compensation has been planned so far.

Since compensations for crops have not been carried out and are not planned anymore, a significant gap is identified in this respect.

■ Sustainability of livelihood restoration programs

World Bank ESS 5 requires the RAP to ensure that proposed activities consider environment protection and is consistent with sustainable development objectives (ESS 5 Annex 1 §21).

Data from the ESIA suggests that public authorities in Rodrigues are willing to promote sustainable development on the island. This reflects in the RAP and more particularly in the will to promote more sustainable fishing practices. Indeed, the RAP explicitly considers the South East Marine Protected Area (SEMPA) Regulations 2011, which is a regulation that defines the type of areas where fishing is allowed or prohibited on the Island. Fishermen and the Commission on Fishing relied on this regulation to define areas to relocate fisheries.

Moreover, the RAP directly refers to the “Phasing out net fishing” scheme, which incentivizes fishermen to give up their fishing licenses and their activity of fishing with large and gill net. Fishermen were proposed a monetary compensation for giving up their license and received support to start an agricultural project or to work in the deep-sea fishing sector.

Therefore, the RAP articulates sustainable development objectives with livelihood restoration and aligns with ESS 5 requirements and no gap is identified.

■ Access to basic services

According to the ESS 5, the RAP shall ensure that impacted communities get access to basic services in the relocation site. When necessary, the RAP will include their financing and provision as part of the plan (ESS 5 Annex 1 §20). This requirement seeks to ensure that resettled communities leave in adequate conditions and do not see their situation degrading.

The RAP commissioned by the RRA planned the new structure to include access to water, electricity and communication (landline), which was not the case for several households in their accommodation in Sainte Marie. Moreover, the relocation site provides quick access to transportation infrastructure, which bring them closer to education and health services. Overall, therefore, the RAP states that communities live in better conditions after relocation. During the 2023 field mission, PAPs expressed their satisfaction with their relocation housing.

However, some housing structures have not yet access to a track-road, even though it is mentioned in the resettlement contracts. PAPs also face water shortages and must go back to the spring in Sainte Marie to do the laundry in order to save water. It should be noted that water shortcoming is a common issue in the Rodrigues Island. Although access to water has decreased for relocated PAPs, water shortcoming is not a specific problem to resettled households.

Therefore, a minor gap is identified in relation to access to basic services.

3.1.3. Physical displacement

ESS 5 distinguishes between physical displacement and economic displacement. Physical displacement refers to the situation when people living in the Project area are required to move to another location. In this situation, ESS 5 sets specific requirements as detailed below.

■ Entitlement options

Regarding the eligibility of PAPs to resettlement assistance, ESS 5 states if people living in the project area are required to move to another location, they must be offered the choice among feasible resettlement options, including adequate replacement housing or cash compensation. Additionally, they must receive relocation assistance suited to the needs of each group of displaced persons (ESS 5 §27).

The RRA commissioned the elaboration of a RAP to assess the impacts of the Project on land located on the project area of influence. As mentioned in the RAP, the RRA has required the Commission on Agriculture, the Cadaster Office and the Commission on Fishing to identify the occupants of affected land.

As a result of this identification work, the RAP considers as PAPs households that lost their residential structures and adjacent land in Sainte Marie;

For the Project, the RAP mentions that PAPs had the choice between monetary compensation and relocation. PAPs chose relocation in new housing with access to basic services. On the one hand, PAPs

were proposed complete relocation in a structure where access to electricity and water was included; on the other hand, the valuation method described in the RAP referred only to the market value of the structures and did not include transaction costs, setting access to electricity and water when it was already the case. However, since most of structures were in a poor condition, PAPs ended up living in better conditions with the relocation option than with the monetary compensation. As noted below, all PAPs were to be provided with 60-year lease agreements for their new land allocations per standard procedures for occupation on or use of government-owned land on Rodrigues Island.

Since one of the two compensation options did not meet ESS 5, a minor gap is identified between ESS 5 requirements on eligibility and the RAP solutions. This gap has a limited impact since the resettlement has already been implemented and PAPs live in better conditions than prior relocation.

■ **Type of compensation offered to formal occupants or with legal right**

ESS 5 sets specific requirements depending on the ownership of the occupation title and its type. In the case of physically displaced persons with formal right or legally recognizable right to land or asset, the Project must offer the choice of replacement property of equal or higher value, with security of tenure, equivalent or better characteristics, and advantages of location, or cash compensation at replacement cost. Compensation in kind should be considered in lieu of cash (ESS 5 §28).

According to the RAP, only 5 households owned a formal right to occupy the land that was located within the Project's footprint. As per law, they were proposed a new lease on the land selected for resettlement. The PAPs are waiting for the lease to be formally offered as of March 24th. This delay results from the elections that induced a change in heads of key administrative functions. Moreover, some PAPs have cultivated beyond their assigned perimeters which required an update of the leases and induced a delay in the granting of the lease.

The solution provided by the RAP for PAPs owning a formal legal title therefore meets national law and the ESS 5 requirements. Although the proposed solution matches ESS 5 and national law requirements, a significant gap is identified since the PAPs have not yet received their lease that would allow them to formally secure their housing.

■ **Compensation for informal occupants**

In the case of informal occupants, i.e. individuals without formal or recognizable rights to occupy the land where they are settled, ESS 5 requires specific compensation activities. For this category of PAPs, projects must provide arrangements to allow informal occupants to obtain adequate housing with security of tenure (ESS 5 §28).

For the Project, informal occupants were proposed a lease for the relocation site. Among the 15 households that were physically displaced, only 5 had a formal title, and among the owners of displaced fisheries, boat house and agricultural land, none had a formal title to occupy these structures and land. The solution provided in this RAP aligns with domestic legislation, the State Lands Act, which states that squatters can receive exceptional support from public authorities to be relocated. In such case, although PAPs will have to pay the lease, the cost is defined in consideration of their income, which gives an opportunity to informal occupants to secure tenure. The land tenure secure will also be extended to host community members who practice agriculture and livestock breeding without formal land title.

Although the solutions proposed to informal occupants meets ESS 5 requirements, the field mission has allowed to identify that leases have not been delivered yet to affected individuals. According to the Cadaster Office, these should be delivered by the end of the first semester of 2023. Therefore, a significant gap has been identified in this respect.



Figure 1: Resettlement housing and gardening in Plaine Corail

■ Opportunistic behavior

As per ESS 5, the Project is not required to compensate or assist those who encroach on the project area after the cutoff date for eligibility, provided the cut-off date has been clearly established and made public (ESS 5 §30).

According to the RAP, impacted families were identified early in the resettlement process and they were informed about the census and inventory dates in writing. Moreover, the geographical context of the Project implies that no opportunistic behavior is possible. Indeed, the families living in the Project area are well known and established in the zone long ago. Additionally, as an island, Rodrigues is not prone to opportunistic migration driven by projects' development. Therefore, there is no mention of opportunistic behavior in relation to the Project's land acquisition.

Therefore a gap was identified, but with inconsequential results due to the local context. However any new project-related resettlement activities should include explicit cut-off dates to ensure ESS5 compliance.

■ Forced eviction

ESS 5 §31 requires that during land acquisition process, no forced eviction takes place. Forced eviction is defined as is defined as the permanent or temporary removal against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection. Compulsory land acquisition is acceptable as long as it complies with domestic legal requirements and ESS 5 provisions.

According to the RAP, no forced eviction took place. PAPs agreed to be resettled since they acknowledge that the Project brings benefits to the island. They were given opportunities to express grievances and negotiate compensation, and the whole process was transparent enough to give PAPs guarantees about the fairness of the resettlement.

Therefore, no gap has been identified in relation to forced eviction.

3.1.4. Economic displacement

ESS 5 distinguishes between physical displacement and economic displacement. Economic displacement refers to the situation where the Project affects the livelihood or income generation of impacted population. In this situation, ESS 5 sets specific requirements as detailed below.

■ Compensation value

ESS 5 states that economically displaced persons who face loss of assets or access to assets will be compensated for such loss at replacement cost, and compensation in kind will be preferred over monetary compensation, particularly for loss of land (ESS 5 §34).

As mentioned in the RAP, the RRA has required the Commission on Agriculture, the Cadaster Office and the Commission on Fishing to identify the occupants of affected land.

As a result of this identification work, the RAP considers as PAPs:

- Users of agricultural and grazing land in Sainte Marie, Plaine Corail and Bangelique;
- Individuals who lost access to structures used for fisheries or tourism (boat house) in Pointe Corail and Bangelique

The RAP details the compensation process and conditions that were implemented within the Project. More particularly:

- Households who lost land for agricultural or grazing were proposed equivalent land surface, and the RAP details the provided surface for each PAP;
- Household/individuals who practiced fishing had the opportunity to receive a monetary compensation for the structures lost or a relocation of the structures, as well as a compensation for revoking their fishing license when they decided to do so, which contributes to sustainability objectives of Rodrigues.

These options were negotiated with PAPs and the Commissions on Agriculture and Fishing, notably to select alternative sites that provide satisfactory conditions. However, one fishery has not agreed yet to the resettlement to the proposed relocation site, as described in the next section.

Additionally, the field mission allowed the audit team to identify a woman in the host community who was directly impacted by the resettlement without proper consultation. This woman's grazing plot located in Plaine Corail was selected to build a relocation housing structure. The government officials came to measure the necessary land without her prior authorization. She has not received a notification about the timeframe to release the required plot, and the environment police came to notify that she had one day to vacate her land. She was ultimately provided with an alternative land and a contract after she vacated the land. Whereas the compensation ultimately aligns with ESS 5 requirements, the procedure followed in this case does not comply with ESS 5.

The approach planned and implemented in the RAP broadly aligns with ESS 5 requirements. However, the fact that a fishery had still not received compensation in kind for the lost warehouse by March 2023 and an impacted women in the host community was evicted in short delay without prior provision of replacement land is considered as a discrepancy with ESS 5 requirements. Therefore, a minor gap is identified with this respect.

■ Livelihood restoration

World Bank ESS 5 requires that economically displaced persons will be provided opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living (ESS 5 §35). This aims at limiting the projects' impacts on populations' livelihoods and economic activity, and providing benefits to impacted populations.

In the case of the Project, the RAP planned livelihood restoration measures when a PAP's land is impacted or access to resources is limited because of the Project's land acquisition. Activities were provided based on each economic activity and the individuals' status. These measures included:

- The formalization of agricultural and livestock breeding activities through the delivery of an authorization by the Commission on Agriculture, both for relocated individuals as well as individuals from the host community to avoid any tension;

- The development of lands provided as a compensation through land rehabilitation, fencing, irrigation and the construction of crop storage facilities;
- The construction of a model farm for livestock breeders, equipped with a shelter and drinking system;
- The construction of a common building for each fishery to store fishermen’s material;
- Fishermen who would give up their fishing license would receive training for deep-sea fishing, which requires specific techniques and materials, and training for agricultural and livestock breeding projects; and
- Public interest works (cleaning of the channel, land development) for workers of fishing cooperatives who would not be eligible for the package designed for fisheries owners.

Nevertheless, livelihood restoration is the most challenging aspect of the resettlement and activities appear to be limited and inadequate to PAPs’ situations. Out of the 6 proposed livelihood restoration activities listed above, only 1 has been implemented, 4 have been partially implemented and 1 have not been implemented. This section provides more detail on this issue.

Regarding PAPs practicing agriculture, the land selected by the RRA called *La boucherie* for the relocation of agricultural activities has not been prepared and provided yet for all but 3 households. This includes 1 resettled household from Sainte Marie and 2 households who used to practice agriculture near the village. Moreover, the agricultural licenses have not been provided yet. Since PAPs now live far from their initial agricultural plot, they are not able to monitor their crops and protect them from grazing livestock.



Figure 2: The site of La Boucherie selected for agricultural land development, invaded by piquant-loulou, view from Piment Reposoir

Regarding raising of livestock, most PAPs from Sainte Marie have received a land fenced and developed for livestock breeding in Plain Corail, but PAPs have mentioned that the provided land is not adapted to the size of their livestock. Moreover, the coral soil of these lands makes livestock breeding not viable since the zone is too arid. Finally, the grazing plot that was initially planned next to the livestock breeding area has been cancelled so breeders have no mean to feed their animals. The grazing plot has indeed been cancelled to host the “Airport City” project. As a result, PAPs have left their animals in Sainte Marie where they previously grazed, and most of them have reduced the size of their livestock knowing that it will not be possible to maintain livestock breeding at the same scale. Livestock breeders located in Bangélique have not yet started to decrease the size of their livestock flocks but they also mentioned that they will not be able to continue their activities in the proposed infrastructure.



Figure 3: Resettlement livestock breeding areas in Les Salines



Figure 4: Area initially selected for forage collection near Plaine Corail

Regarding fishing, the situation is diverse:

- First, the non-resident fishermen who accepted to give up their activity were provided with support to start agricultural activities as well as off-lagoon fishing license. These fishermen are satisfied with their livelihood restoration package although they do not practice off-lagoon fishing because of the lack of equipment. They prefer to keep fishing illegally in the lagoon;
- Second, the non-resident fishermen who agreed to relocate their activity, operating as a 7-member cooperative led by fishing permit holder Mr Bruno Capdor, face additional costs notably gasoline for the cars to access the relocated fishery structures, and gasoline for boat motors because they must use their motors to go fishing whereas they were previously able to use boat sail. Moreover, they compete with other fishermen who are displaced but fish illegally in the area. These fishermen are not totally satisfied with their situation but accept that their livelihood slightly decreases;
- Third, a group of non-resident fishermen living in Dans Coco (a community located outside the project's resettlement-impacted zone), previously operating in Pointe Corail as an eight-member cooperative under fishing permit holder Mr Jean Rouler Altier, has refused to relocate to the proposed location because it would make their activity not viable given the gasoline expenditures involved with accessing the location. Initially, they were provided with a site that was satisfactory to them and the construction of the fishery started, but this location was eventually cancelled because it is located within immediate proximity of a protected area. They are currently still operating as previously but they know that moving to the new place will significantly impact their ability to maintain their livelihood ;
- Finally, the field mission carried out in March 2023 identified that women in Dans Coco will inevitably be impacted by the relocation of the fishery from their village. Currently, women of the village buy catches brought to the village in the fish landing station, transform the fish and sell

it. In case the fishery would be relocated to Camp Pintade, the transportation expenses incurred to reach Camp Pintade would make their activity not viable. This consists in the main economic activity of Dans Coco's women. This impact has not been considered in previous studies, and both the impact and livelihood restoration options should be included in the updated version of the RAP.

Although the solution provided in the RAP theoretically aligns with ESS 5 requirements since PAPs were proposed livelihood restoration activities based on their income and status (owner or workers of fishing cooperatives), their implementation has not allowed PAPs to maintain or improve their livelihood and economic activity. Moreover, not all impacted economic operators have been identified. Therefore, a significant gap was identified regarding livelihood restoration.



Figure 5: Relocated fishing warehouse in Les Salines

■ Transitional support

ESS 5 requires that in case of economic displacement, economically displaced persons will receive transitional as necessary, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living (ESS 5 §36).

The RAP does not refer to transitional support, except for workers of fisheries who were not entitled to any compensation since they have no fishing license or assets. For these workers, the RAP has provided them with land management works (cleaning of the channel, preparation of land for community livestock breeding projects). The PAPs had the opportunity to carry out this work for 4 months and received a salary for this work, but they have then returned to their fishing activity. Currently, no restriction on fishing has been implemented and PAPs keep fishing in the same area.

Therefore, a significant gap is identified with respect to transitional support.

3.1.5. Mobilization of institutional and administrative resources

ESS 5 requires the project promoter to establish means of collaboration between the agency or entity responsible for project implementation and any other governmental agencies, subnational jurisdictions or entities that are responsible for any aspects of land acquisition, resettlement planning, or provision of necessary assistance (ESS 5 §37). This should ensure an efficient process and the mobilization of adequate resources to facilitate the planning and implementation of the RAP.

In the Project's RAP, the RRA and relevant commissioners have been mobilized to plan and implement the resettlement activities. At the planning phase, the RRA has created a Steering Committee composed of the various local administration members, notably the Commission on Agriculture, the Commission on Fishing, and the Cadaster Office to pre-identify PAPs and their land, as well as the selected sites for relocation. For the implementation phase, the RRA has created the EPMU, a specific body in charge of

liaising between PAPs, the administration and contractors building the new structures. Finally, the Commissions on Agriculture and Fishing were mobilized to propose livelihood restoration activities to fishermen and farmers.

It should be noted that commissioners of the RRA are highly dependent on political cycles since the head of commissions and their competences change with each election cycle. The RRA has been mostly in charge of the RAP design and implementation. The field mission has shown that the change of administration has not allowed implementation and monitoring of the livelihood restoration activities. Therefore, this makes the current institutional structure too dependent on political cycles, which hampers smooth implementation of the RAP.

Therefore, although the RRA has mobilized all the administrative resources relevant for the RAP implementation, the current functioning does not allow for optimum implementation monitoring and follow-up, which results in a significant gap.

3.1.6. Planning and implementation

■ Planning

According to ESS 5 §22, the RAP must establish the roles and responsibilities relating to financing and implementation of the resettlement.

In the case of the Project, the RAP has established a plan and a budget for its implementation. The budget includes the cost of the construction of new houses and structures as well as the connection to water and electricity network. The RAP also provides a schedule for its implementation. According to the multipartite contracts signed by the RRA with PAPs and construction contractors, the structures should have been delivered within 6 months of the signature. The purpose of this clause was to ensure minimum disturbance of PAPs' livelihoods and comfort. It should be noted that because of the Covid 19 pandemic and additional requirements by PAPs, the completion of the works was delayed.

Overall, the RAP provides a detailed description of the budget and planning necessary for its implementation. Therefore, no gap is identified in this respect.

■ Monitoring and auditing

According to ESS 5 §23, the RAP will establish procedures to monitor and evaluate the implementation of the plan and will take corrective action as necessary during implementation to achieve the objectives of the ESS 5.

The RAP does not provide detailed information about monitoring methodology. It contains a mere statement that it is key to not expropriate PAPs without follow-up. However, the RAP does not prescribe any monitoring activity, indicator, or plan. During the field mission, officers from the RRA have mentioned that there is a follow-up of the RAP implementation, but this is mostly a financial monitoring to ensure that RAP activities are financed according to public procurement rules in Mauritius and Rodrigues and as per the defined budget. These audit documents are available online¹ but are of limited value for the RAP monitoring and follow-up in relation to PAPs.

Therefore, there is a significant gap between ESS 5 requirements and the RAP.

■ End of the RAP

ESS 5 §24 states that RAP will be considered completed when the adverse impacts of resettlement have been addressed in a manner that is consistent with the relevant plan as well as the objectives of

¹ See for instance National Audit Office, Report of the director of audit on the accounts of the RRA for the financial year 2019-2020, available at https://nao.govmu.org/Documents/Reports/2019_20/AR_2019_20_RRA.pdf; National Audit Office, Report of the director of audit on the accounts of the RRA for the financial year 2020-2021, available at <https://nao.govmu.org/Documents/Reports/2022/RRA-2020-21/AuditReport-RRA-2020-21.pdf>; National Audit Office, Report of the director of audit on the accounts of the RRA for the financial year 2021-2022, available at <https://www.maurice-info.mu/2023-03-28-document-rapport-de-laudit-2021-2022-pour-rodrigues.html>

the ESS, and calls for an external completion audit to be carried out once all mitigation measures have been substantially completed. This requirement is served by this current audit, which was requested by the World Bank to ensure ESS5 compliance.

The RAP does not explicitly consider the end of the resettlement activities.

Therefore, a significant gap has been identified in relation to the end of the RAP. This is particularly relevant for the livelihood restoration aspects of the resettlement.

3.1.7. Key Issues Identified

As a result of the analysis above, the following items were considered as key issues to be considered in updating the RAP

■ RAP Institutional framework

A key issue is the lack of clarity regarding the institutional framework used for this RAP. During the resettlement planning and implementation, a steering committee and then the EPMU were in charge of managing the resettlement. These agencies are fully integrated within the local administration and more particularly to the RRA. The Project promoter, AML and its affiliate ARL, were not involved in any of the RAP activities. However, this structure has shown limits in managing the resettlement on the long term. More particularly, the field mission has allowed to identify the following issues:

- The sanitary crisis because of the Covid-19 has significantly slowed down the implementation of the resettlement activities;
- The implementation of the resettlement activities, when managed by the RRA, is highly dependent on political cycles. For instance, the change of administration following the elections in February 2022 have affected the RAP implementation because new heads of administration do not know well all the issues, files such as compensation files “get lost” (according to a PAPs who required the compensation payment), and PAPs do not know to whom they should go to lodge a complaint or ask for follow-up;
- The implementation of the resettlement activities, when managed by the RRA, is highly dependent on political interests. Indeed, the Project being a key undertaking for Rodrigues, a contribution to the RAP activities can result in oral promises without follow-up, such as compensation for moral damage, or a lack of interest in the RAP if there is no political result to expect.

Therefore, to avoid such challenges, this audit suggests transferring the RAP implementation, follow-up and monitoring to AML, supported by ARL. More details are provided in the section 4.

■ Compensation for lost assets

The payment of a monetary compensation for lost asset is the first outstanding issue pending in the RAP implementation. An inventory of impacted assets, notably perennial crops, has been carried out by government officers, but no compensation amount has been communicated to PAP.

According to consultations with PAP, the non-payment of compensation is not a central issue mentioned in the outset. PAPs are more worried about their difficulty to maintain an overall balance between livestock breeding and other activities. Yet, crop trees are considered as productive assets that require time to be productive, and it is considered as a form of investment. Some PAPs have also mentioned that they were proposed a compensation for the moral damage, also referred to as “compensation for *déracinement*” (“uprooting”), during discussions, but it was not formalized in the relocation contract.

During an interview with a head of division in charge of the Project, which sits within the Commission for Civil Aviation Affairs, it appears that the new administration is not aware of such payment. Additionally, it results from the interview that after all, PAPs received a nice structure and live in much better housing than previously so there is no need to pay for impacted crops.

The payment for impacted assets is a key requirement of ESS 5, and the provision of high-quality housing does not replace the compensation for the loss of a productive asset. It is therefore key to proceed to the payment of compensation for crops impacted by the Project to conform to ESS 5.

■ Due consideration for vulnerable groups

Although the RAP and ESIA suggest that vulnerability is not an issue, notably regarding women and their possibility to take part in engagement activities, the field mission has allowed to identify that impacted households may have specific needs. This is the case for household in which a member has a particular health condition or includes an elderly person.

Overall, the field mission has demonstrated that displaced household headed by young individuals are more able to cope with the shock induced by the Project. Household headed by older individuals face more difficulty to change their livestock breeding and agriculture activities and are less able to find an alternative livelihood. Additionally, women are more able and willing to start a small business such as petty trade or food stall and food transformation near the airport.

Since vulnerability and gender issues are of significant interest to the World Bank, it is recommended that the updated RAP include processes to assess specific needs of impacted households. These needs may relate to the proximity of the livestock breeding or agricultural lands, or to specific support required to continue these activities.

■ Stakeholder engagement

The lack of engagement with PAPs after the resettlement into new housing is a key complaint that was raised during consultations. According to them, no consultations or follow-up meetings have taken place after the resettlement in the new houses. They are also puzzled by the changes in administration resulting from the election since they do not to whom they should go to express concerns. This lack of engagement coupled with limited livelihood restoration effectiveness has created the impression that they were “used” for the Project and manipulated.

The stakeholder engagement should not be limited to the preparation phase and should be carried out through the whole life cycle of the Project. It is therefore suggested to urgently restore communication within the RAP update and implementation.

■ Grievance management

The RAP states that a helpdesk was set-up early in the process to collect grievances and complaints from PAPs during the planning process. This role was then taken over by the EPMU. However, given the lack of availability of the administration, the audit field mission was unable to collect grievances expressed by PAPs to the RRA and the EPMU. Moreover, PAPs have complained about the lack of follow-up of their situation and the lack of answers to several of their grievances regarding livelihood restoration activities. No data are available regarding the number of complaints submitted, their systematic registration in a complaint log, and prompt delay to solve these complaints.

This suggests that there have been limited and efficient ways for PAPs to submit a complaint or grievance in relation to their resettlement, notably on livelihood restoration activities. Since AML, with ARL support, is expected to lead the resettlement implementation and follow-up, AML will have to implement a grievance mechanism that aligns with the one proposed in the SEP. Basic principles and features of the grievance management mechanism are proposed in Section 4.

■ Livelihood restoration

According to the RAP, relocated households have access to better housing conditions than before the resettlement took place. However, the restoration of livelihoods is clearly the most challenging issue met in the RAP implementation.

The resettlement affects the PAPs’ ability to maintain their livelihood. As described in the ESIA, the PAPs who lived in Sainte Marie maintained a balanced livelihood composed of fishing, agriculture, and livestock breeding within immediate proximity of their housing. These activities allowed them to reach a level of comfort with many of households owning comfort appliances and goods such as cars, refrigerator and television. The resettlement of these households to another location that do not allow them to maintain these three activities has affected their livelihood. Most PAPs have stopped agriculture because their resettlement housing is too far from their previous agricultural plots and the land that was selected by the RRA as replacement for agriculture has not been developed. Moreover, a majority of PAPs have mentioned that they will have to considerably reduce livestock breeding activities because of the lack of space and forage on the site in Les Salines. Finally, fishing is difficult to restore near the villages considering conservation objectives of the island and the existing competition for fishing.

This situation has created fears and worries for the future and the ability of PAPs to meet the needs of their children. It was suggested in this respect that the Project could focus on providing jobs and opportunities to children of PAPs instead of trying to restore agriculture and livestock breeding in a constrained environment.

The effectiveness of livelihood restoration will be a key aspect to ensure alignment of the RAP with ESS 5 objectives and requirements.

■ **Tenure security**

In projects development, the management of PAPs without formal or recognizable legal title is one of the most challenging. Indeed, this issue stresses the discrepancies between ESS 5 requirements to give due consideration and support to individuals without formal rights, whereas domestic law usually does not recognize any rights to such individuals.

In Rodrigues, land is mostly publicly owned so land acquisition is not an issue and land occupancy is done through long-term leases. A majority of PAPs do not own any lease to legally occupy the impacted land and structures.

The RAP has planned to maintain the tenure of PAPs occupying their land with formal titles, but has also planned to formalize the land title of informal occupants through the granting of a lease. However, according to data collected during the field mission, leases for residential land has not been granted yet. Although the RRA has planned to deliver the leases before the first half of 2023, this can hamper PAPs from formalizing entrepreneurial activities such as the registration of food kiosk or petty trade business.

■ **RAP follow-up and implementation.**

The last gap identified in the RAP relates to the follow-up and monitoring of its implementation. Despite the limited scale of the impacts on land and PAPs, the RRA has not ensured a follow-up of PAP's situation. Nevertheless, the RAP does not provide any indicator or monitoring procedures to ensure that the RAP is being effectively implemented and that corrective measures are adopted accordingly.

This is of relevance given the feedback from the PAPs on the lack of engagement and follow-up. Besides the fact that it is required by ESS 5, follow-up and monitoring activities will give PAPs a sense that they are considered by the Project and that activities are implemented to ensure that they are not collateral victims of the Project development.

3.2. Summary of the gap analysis

Table 5 - Summary of the gap analysis and actions required

Issue	ESS requirements	Provision/Implementation in the RAP	Gap	Action required	Responsible Entity	Timeframe
	Community engagement - ment	Engage with affected communities, including host communities (ESS 5 §17)	<p>Meeting, discussions, and written communication have taken place for the presentation of the situation and objectives of the resettlement, consultations about choices (compensation in kind or monetary), location selected for resettlement...</p> <p>Some PAPs said they would prefer a resettlement contract in French rather than English</p>	Significant gap	<p>The team responsible for implementing the RAP must:</p> <ul style="list-style-type: none"> Engage with PAPs for the design and implementation of livelihood restoration activities; Include engagement of host communities; Use relevant language for resettlement contracts 	<p>PIU (AML), with ARL support</p> <p>Inclusion of RRA for appropriate consultations (e.g. lease agreements)</p>
Ensure an inclusive consultation process for resettlement planning and implementation (ESS 5 §18)		Women are equally involved with men in decision making regarding the household situation.	Significant gap	The field missions concluded that women can engage freely in discussions relating to the household resettlement and livelihood activities. Nevertheless, it is necessary to organize specific engagement activities to fully align with ESS 5 requirements.	AML/ARL	All future consultation activities on this RAP and any future RAPs to include this aspect.



Issue	ESS requirements	Provision/Implementation in the RAP	Gap	Action required	Responsible Entity	Timeframe
Grievance mechanism	The Borrower will ensure that a grievance mechanism for the project is in place (ESS 5 §19).	No systematized grievance management mechanism	Significant gap	A grievance management mechanism must be established and communicated to PAPs to ensure a timely, appropriate, effective and secured management of complaints regarding resettlement and livelihood restoration activities, as well as any other grievances related to the project. The mechanism must deal both with written and oral complaints. This mechanism must systematically record complaints, oral or written, in a database.	AML/ARL	As soon as possible and no later than one month after Project's Effective date (deadline for Project GRM in ESCP)
RAP design	In the case of physical displacement, develop a plan that covers, at a minimum, the applicable requirements of ESS 5 (ESS 5 §20).	The RRA has developed a RAP to structure and document the resettlement of affected individuals.	No gap	No action required for existing RAP, TORs for any future RAPs to be reviewed by World Bank. be noted that any further resettlement will have to respect the principles and requirements set in World Bank ESS 5, and the RAP will have to be prepared at the prior resettlement activities	AML/ARL World Bank (non-objection review of future RAP TORs)	If/when future RAPs needed



Issue	ESS requirements	Provision/Implementation in the RAP	Gap	Action required	Responsible Entity	Timeframe
Findings	The Borrower will establish a cutoff date for eligibility that will be communicated in appropriate forms (ESS 5 §20).	The RRA has communicated to PAPs the date for launching and closing the census.	Minor gap	No action required for previously resettled PAPs under existing RAP. Further resettlement shall ensure that census, inventory and cut-off date are communicated to PAPs to avoid eligibility claims.	AML/ARL	If/when additional resettlement is needed.
	The RAP will include a description of the scope and scale of the land acquisition, and a description of the project (ESS 5 Annex 1 §4)	The RAP does not include a description of the scope and scale of the land acquisition, nor a description of the Project	Minor gap	The revised version of the RAP, to be completed no later than two months after the project's Effective Date shall include a description of the scope and scale of the land acquisition, as well as a description of the Project.	AML/ARL	No later than two months after Project's Effective date
	The RAP will include a description of the baseline of the social environment (ESS 5 Annex 1 §6)	The RAP includes a description of households and their activities	Minor gap	The amended RAP as well as future RAPs should include aggregated data about PAP incomes where it is available.	AML/ARL	No later than two months after Project's Effective date
	The RAP will identify vulnerable groups and consider specific support to these (ESS 5 Annex 1 §6).	The RAP does not identify vulnerable groups. However, it considers specific support for households without formal property titles and seek to ensure that all resettled PAPs have access to basic	Significant gap	To be closed, this gap requires: <ul style="list-style-type: none"> To consider the special needs of households, notably for health or mobility reasons; 	AML/ARL	As soon as possible and no later than two months after Project's Effective date



Issue	ESS requirements	Provision/Implementation in the RAP	Gap	Action required	Responsible Entity	Timeframe
		services and live in adequate conditions		<ul style="list-style-type: none"> To consider systematically special needs in further resettlement action plans. Payment of small vulnerability allowance to vulnerable individuals/ households, to offset any hidden costs of resettlement faced by vulnerable persons. 		
	The RAP will define the applicable legal framework and standards (ESS 5 Annex 1 §7)	The RAP refers to key legislation in relation to expropriation for public purpose and land use.	Minor gap	<p>The RAP shall explicitly refer to World Bank ESS 5 and align with principles and requirements set in this standard.</p> <p>Additionally, the RAP will include a gap analysis between the domestic legal framework and ESS 5 requirements</p>	AML/ARL	No later than two months after Project's Effective date
	Disclose and apply compensation standards for categories of land and fixed as well as supplementary measures necessary to achieve their	The RAP explains methodology for calculating compensations and support measures. These have been communicated to PAPs during engagement activities. However, process has not led to	Significant gap	<p>To ensure alignment with World Bank ESS 5, the RAP implementation team shall:</p> <ul style="list-style-type: none"> Communicate and pay to PAPs all as yet unmet compensation for loss of 	AML/ARL	As soon as possible and no later than two months after Project's Effective date for current or future PAPs identified for this RAP



Issue	ESS requirements	Provision/Implementation in the RAP	Gap	Action required	Responsible Entity	Timeframe
	replacement (ESS 5 §13 / ESS 5 Annex 1 §10).	communication and payment of compensation to PAP. The new administration in place is not aware of the need to pay a compensation for lost crops. Additionally, it is not clear whether the valuation include all costs incurred by the resettlement, such as removal cost, transaction cost.		crops, notably perennial ones; <ul style="list-style-type: none"> Propose a monetary compensation at replacement cost, not market value of impacted assets For any additional resettlement under this RAP and for future RAPs, clearly state persons being displaced are entitled to take any salvageable items without deduction of compensation amount Any relocation costs (transport, etc.) or administrative transaction costs (e.g. for registration of leases) for PAPs to be paid by the project Financial management support/advice provided to any PAPs receiving cash compensation. Future RAPs to contain valuation and loss compensation matrix describing proposed types of levels of compensation for land natural resources and other assets, and any 		Future RAPs if/when required



Issues	ESS requirements	Provision/Implementation in the RAP	Gap	Action required	Responsible Entity	Timeframe
				needed supplemental measures.		
	The RAP will ensure that proposed activities consider environment protection and sustainable development objectives (ESS 5 Annex 1 §21)	Livelihood activities proposed, notably for fishing and agriculture, seek to articulate economic activities with sustainable development.	No gap	Economic and financial sustainability of livelihood restoration activities shall be assessed.	AML/ARL	No later than two months after Project's Effective date
	The RAP will describe access to basic services and include their financing and provision in the RAP if necessary (ESS 5 Annex 1 §20).	The RAP gives specific consideration to access to basic services for resettled households, by ensuring they have access to water and electricity. Additionally, the RAP mentions that the relocation site ensures better access to road infrastructure and therefore better access to education for children.	Minor gap	Access to the road through the construction of track-road must be completed to ensure proper access to basic services.	AML/ARL	No later than two months after Project's Effective date for water and electricity. Provision of road access to PAPs within 2 months of start of project works.
	P Offer displaced persons choices among feasible resettlement options, including adequate replacement housing or cash compensation; and a provide relocation assistance suited to the	PAPs had the choice between monetary compensation and relocation. The valuation of impacted structure referred only to the market value of the structure and did not include transaction fees,	Minor gap	No action required since the resettlement has already been implemented. For any further resettlement under this RAP and for future RAPs PIU must propose a monetary compensation at replacement cost, not only the	AML/ARL	No later than two months after Project's Effective date for current or future PAPs identified for this RAP

Issue	ESS requirements	Provision/Implementation in the RAP	Gap	Action required	Responsible Entity	Timeframe
Detailed description of the issue: displacement of persons and housing for affected persons.	needs of each group of displaced persons (ESS 5 §27).	setting access to electricity and water.		market value of affected assets.		Future RAPs if/when required as part of RAP preparation
	Owners of formal titles or recognizable titles will be offered the choice of replacement property of equal or higher value, with security of tenure, equivalent or better characteristics, and advantages of location, or cash compensation at replacement cost. Compensation in kind should be considered in lieu of cash (ESS 5 §28).	Per domestic law, PAPs with lawful occupation title are offered a new lease on the new land.	Significant gap	PAPs should be provided with the leases for their housing, which is expected to take place within the first semester of 2023. In further resettlement activities, lease should be delivered sooner after the PAPs get reinstalled in their new housing.	AML/ARL	No later than two months after Project's Effective date for current or future PAPs identified for this RAP Future RAPs if/when required as part of RAP preparation
	Informal occupants receive arrangements to allow them to obtain adequate housing with security of tenure (ESS 5 §29)	Informal occupants were proposed a lease for the relocation site.	Significant gap	PAPs should be provided with the leases for their housing, which is expected to take place within the first semester of 2023.	AML/ARL	No later than two months after Project's Effective date for current or future PAPs identified for this RAP If/when future RAPs required, included as part of RAP preparation
	Those who encroach on the project area after the cutoff date are not	Issue determined to not be relevant to the Project's existing RAP	NA	No action required for current PAPs	ARL/AML	No later than two months after Project's Effective date for

Issue	ESS requirements	Provision/Implementation in the RAP	Gap	Action required	Responsible Entity	Timeframe
Economic impacts	eligible to support (ESS 5 §30)			Future RAPs to include cutoff date		current or future PAPs identified for this RAP Future RAPs if/when required as part of RAP preparation
	The Borrower will not resort to forced evictions of affected persons (ESS 5 §31).	No forced evictions took place	No gap	No action required for current RAP. Condition of all future RAPs	AML/ARL	Future RAPs if/when required as part of RAP preparation
	Economically displaced persons who face loss of assets or access to assets will be compensated for such loss at replacement cost (ESS 5 §34).	Loss of agricultural or grazing land was compensated with equivalent land surface. Structures for fishing were compensated through relocation	Minor gap	To ensure full compliance with ESS 5 requirements, it is necessary to: <ul style="list-style-type: none"> • Provide replacement structure to the fishery located in Dans Coco; • Ensure future RAP consider economic displacement in host communities per ESS 5; • Provide water, electricity and other developments as per the plan to ensure that the built structure is fit for purpose. 	AML/ARL	No later than two months after Project's Effective date for current or future PAPs identified for this RAP Future RAPs if/when required as part of RAP preparation
Economically displaced persons will be provided livelihood restoration programs (ESS 5 §35)	Beside compensation in kind, additional livelihood restoration measures include the development of	Significant gap	Livelihood restoration activities are not fully operational even though 2 years have passed since the	AML/ARL	As soon as possible, and no later than two months after Project's Effective date for	

Issue	ESS requirements	Provision/Implementation in the RAP	Gap	Action required	Responsible Entity	Timeframe
		agricultural and grazing land (fencing, irrigation...) and training		<p>PAPs were resettled, which limits their access to their previous livelihood activities.</p> <p>To ensure alignment with ESS 5, it is suggested to:</p> <ul style="list-style-type: none"> • Proceed urgently to the development and delivery of agricultural land and permits; • Ensure urgently that livestock breeding is made possible in Les Salines by providing solutions for grazing and forage delivery; • Provide an alternative site or livelihood activity for fishermen who have not accepted the proposed relocation site in Camp Pintade • Address potential loss of livelihoods for Dans Coco women who previously processed fish provided by displaced non-resident fishers based in Dans Coco 		<p>current or future PAPs covered by this RAP</p> <p>Future RAPs (if/when required) measures included as part of RAP preparation</p>
	Transitional support will be provided as	The RAP does not refer to transitional support. PAPs	Significant gap	To align with World Bank ESS 5, it is required to urgently	ARL/AML	As soon as possible and no more than two

Issue	ESS requirements	Provision/Implementation in the RAP	Gap	Action required	Responsible Entity	Timeframe
	necessary to all economically displaced persons (ESS 5 §36)	have been relocated and lost access to their livelihood activities, whereas livelihood restoration activities have not been implemented for 2 years. This constitutes a loss and no transitional support has been provided in the meantime		consult with PAPs to define and implement transitional support measures and activities.		months after Project's Effective Date for current and any new PAPs covered by this RAP
Collaboration	PIU to take lead of resettlement activities while establishing means of collaboration between the PIU responsible for project implementation and any other governmental agencies responsible for land acquisition or resettlement planning, or provision of necessary assistance (ESS 5 §37).	Commissions on agriculture and fishing were involved, as well as the Cadaster Office for defining relocation sites and lands.	Significant gap	It is suggested that AML/ARL PIU leads further resettlement activities.	ARL/AML (lead) RRA Cadaster Office Agricultural and Fishing Commissions Other agencies as needed.	As soon as possible and no more than two months after Project's Effective Date

I S S U E	ESS requirements	Provision/Implementation in the RAP	Gap	Action required	Responsible Entity	Timeframe
r e s p o n s i b l e a g e n c i e s o r s u b n a t i o n a l j						



Issues	ESS requirements	Provision/Implementation in the RAP	Gap	Action required	Responsible Entity	Timeframe
URDISCTIONS						
Planning	<p>Establish clear roles and responsibilities relating to resettlement financing and implementation (ESS 5 §22).</p> <p>The RAP will provide procedures to monitor and evaluate the implementation of the plan and will take corrective action as necessary during implementation (ESS 5 §23).</p>	<p>The RAP has established a plan and a budget for implementation, but responsibility needs to shift from government to the project PIU..</p> <p>Although the RAP acknowledges that it is key to not expropriate PAPs without follow-up, it does not require any monitoring activity or indicator.</p> <p>Currently, the only form of audit set up for this RAP is a financial one, but no key performance indicators are provided in relation to the</p>	<p>No gap</p> <p>Significant gap</p>	<p>Identify/redefine authorities/agencies responsible for implementing and monitoring the RAP.</p> <p>To ensure alignment with ESS 5, it is suggested to urgently:</p> <ul style="list-style-type: none"> Set up follow-up and monitoring activities; Establish key performance indicators to measure the effectiveness and implementation of the RAP. 	<p>AML/ARL</p> <p>AML/ARL</p>	<p>As soon as possible and no more than two months after Project's Effective Date</p> <p>As soon as possible and no later than two months after Project's Effective Date</p>



Issue	ESS requirements	Provision/Implementation in the RAP	Gap	Action required	Responsible Entity	Timeframe
Findings	The RAP will be considered completed when the adverse impacts of resettlement have been addressed as per the relevant plan as well as the objectives of this ESS (ESS 5 §4).	effectiveness or the implementation of the RAP. The RAP does not expressly consider the end of the resettlement.	Significant gap	To comply with World Bank ESS 5, current RAP to be updated to include recommendations from this audit report. End of resettlement determined when all the objectives are achieved, more particularly when the adverse impacts of the resettlement have been addressed, and implementation of recommendations in this audit report.	AML/ARL	No later than two months after Project's Effective Date



4. Recommendations to fill the gaps and strengthen the RAP implementation

This section provides the recommendations to ensure that the RAP aligns with ESS 5 requirements. These regards activities to fill implementation gaps (activities that are planned by the RAP but not executed yet) and additional measures to be adopted (those that are not foreseen by the RAP). These additional measures will therefore have to be included when the RAP will be updated.

■ Community engagement

According to data collected during the field mission, engagement with stakeholders and PAPs remain insufficient, particularly once physical resettlement was carried out. It is urgent to re-establish a dialogue with impacted communities. AML/ARL shall lead all further engagement with communities regarding resettlement implementation, with the assistance of RRA Commissions, notably on agriculture, livestock breeding and fishing. Community engagement activities will include notably:

- In the frame of the Stakeholder Engagement Plan that will be implemented, organize information meetings and consultations with each group of impacted communities: livestock breeders, fishermen, physically displaced households and host communities. Specific groups could be organized such as fishermen who were relocated, fishermen who accepted to give-up their fishing license, and fishermen who have not accepted the proposed compensation;
- Consider the explanation of technical issues in restoring PAP's livelihood, including veterinary norms preventing from breeding different types of livestock within one fenced area;
- Organize broader community consultations to identify other impacted stakeholders, such as women buying, transforming and selling fish;
- Ensure inclusive engagement activities and methods that consider vulnerability issues related to economic, social and demographic parameters such as age, disability, literacy, and gender. Focus group discussions with women are particularly recommended for further actions within the RAP;
- Disclosure of the RAP to physically and economically displaced individuals, as well as host communities.
- Consider the translation of the RAP in Creole and dedicated information meeting with each community in case the disclosure of the RAP in English or French is not appropriate;
- Disclosure of the RAP to host communities;
- Timely disclosure and reminders of all dates and steps of the RAP, such as site inspections, census, inventories, release of required land to avoid putting unnecessary pressure on involved communities and individuals;
- Timely disclosure and reminders of information related to compensation rates prior any payment;
- Awareness raising campaigns regarding the grievance management mechanism to both the RRA and PAPs (see below for more detail).

■ Grievance mechanism

To close the gaps with ESS 5, it is recommended that AML's Project Implementation Unit (PIU) develops and implements a grievance management mechanism to collect complaints regarding the RAP implementation. This mechanism should be included in the updated version of the RAP and align with the one proposed in the Stakeholder Engagement Plan by respecting the following principles:

- The complaints resolution process should be transparent and in line with local culture, and community representatives should be included in the the grievance redress process, e.g. as members of a GRM committee charged with resolving grievances;
- The registration of complaints will take into account local languages and their resolutions should be communicated to the complainants verbally and in writing;
- All members of the community (or groups) must have access to the procedure (entitled or not, male or female, young or old);

- All complaints and claims, whether real or unreal, written or oral, should be recorded according to the complaint's resolution procedure;
- All complaints should lead to discussions with the complainant and possibly a site visit to better understand the nature of the problem. Clear timelines for acknowledgement of receipt of grievances, standard periods for their resolution, notification of proposed solutions to grievants, and any appeals process should be established and communicated to stakeholders through appropriate channels and communications methods as part of completion of design and implementation of project GRM, including processes for handling resettlement-related grievances.

PIU will establish a dedicated complaint management log or database that will be accessible in AML office. The grievance management mechanism will be structured as per the following steps to ensure prompt, systematic and documented complaint management:

- PIU will register complaints in the database, capturing the complainants' contact details and a description of the complaint, and give to complainants a receipt indicating when the complaint was registered. Stakeholders should be provided and informed of multiple ways to register grievances, including website, phone numbers, paper-based, verbal. For verbal grievances the PIU should assist the grievant in lodging the complaint formally;
- PIU will undertake a site visit to verify the veracity and severity of the complaint, notably by meeting the complainant, attempt to find a solution, and close the complaint if a solution is found, if it is not legitimate or relevant to the Project;
- PIU will refer the complaint to the Grievance Management Committee. The Complaint Management Committee will be established in the frame of the Stakeholder Engagement Plan, and should include community representatives, with clearly defined Terms of Reference and training for Committee members on the grievance mechanism processes .
- If the Committee cannot resolve the grievance, a higher authority within the project should be available for complainant appeals. This higher authority, to be determined prior to establishing the GRM will attempt to find a solution that is acceptable to the complainant and to the Project;
- PIU will assist the complainant in bringing the claim to a court if the proposed solutions are not satisfactory;
- PIU will bear the cost of any expert that is required to assess the value of a damaged that occurred in the course of the Project.

It is suggested that AML's PIU plays a central role in managing such complaints. This implies that AML PIU will:

- Raise awareness of PAPs that all complaints should be brought to AML's PIU rather to the RRA Commissioners through radio, leaflets and during dedicated consultations and public information sessions;
- Raise awareness of RRA Commissioners and government officers that complaints should be referred to PIU;
- Maintain close relationship with the RRA to regularly collect complaints that could have been brought to the RRA Commissioners by PAP;
- Closely collaborate with the RRA to obtain all documents relating to historical aspects of the RAP and to solve issues related to livelihood restoration activities such as Commission for agriculture, livestock breeding and fishery.

Finally, AML's PIU will communicate with the EPMU to collect all complaints that were brought, adopt corrective measures to manage unsolved complaints and to implement preventive measures to avoid the issues to repeat.

■ RAP content

The gap identified in relation to the RAP content are mostly procedural. These should therefore be addressed in the updated version of the RAP to ensure that the RAP include the required information. More particularly, this includes:

- A description of the Project, which includes the Project's components, the scope and scale of land acquisition, planned use of acquired land, assets impacted such as houses, structures, crops, trees;
- Data about PAP level of incomes as well as an analysis of incomes generated by activity practiced;
- Clearer description of the calculation method, and calculate compensation at replacement cost, not only market value of the impacted assets;
- Direct reference to applicable legislation and standards, including World Bank ESS 5, and provide a detailed gap analysis of the domestic legislation applicable to resettlement against ESS 5;
- Remove the names of PAPs and the value of their replacement assets, monetary compensations, which will be compiled in a separate annex that will remain confidential.

Two significant gaps remain. The first regards the compensation for impacted crops and trees. With this respect, the RAP must provide the cost of compensation for all impacted assets, including trees and crops, with data ventilated by categories of impacted assets. The second gap regards the identification of vulnerable groups. With this regard, the RAP will identify any specific vulnerable group and provide specific support measures. If there is no specific category as such, the RAP will justify this statement and consider situations in which impacted households may require special needs because of health or literacy conditions.

■ Physical displacement

The physical displacement was designed in line with ESS 5. Nevertheless, significant implementation gap remains. To ensure full compliance with ESS 5, it is necessary to implement the following actions:

- Build track-roads from the main road to PAP's relocation housing, with lighting, as foreseen in the RAP;
- Deliver leases to PAPs for the land on which resettlement houses have been built since more than a year has pass since the resettlement has been implemented.

Additionally, the RAP must be amended to include 2 households that are likely to be resettled in 2023. Since these households were not identified in 2019 when the RAP was drafted, an amendment is necessary to document the resettlement process. This resettlement will have to follow the principles and requirements of ESS 5 and recommendations in this audit.

■ Economic displacement

The audit has shown that economic displacement is the most challenging issue of this RAP, and notably the livelihood restoration. Two ensure full compliance with ESS 5, the RAP must fill implementation gaps, which consists in implementing the measures planned in the RAP, and additional measures that was not included in the RAP.

To fill implementation gap, it is necessary to:

- Urgently rehabilitate and develop land selected for agriculture in Boucherie, and provide agricultural licenses to PAPs who were resettled;
- Restore communication with the last fishery that has not been resettled to identify an appropriate relocation site for the fishery and replace the lost structure;
- Ensure access to water, electricity and roads is brought to the relocated fishery of Les Salines, as planned in the RAP;
- Finalize livestock breeding structures and provide solutions for grazing for PAP's animals in the site of Les Salines, including the resettled inhabitants formerly living in Sainte Marie and other breeders occupying land in Bangélique;

Moreover, the updated version of the RAP shall include the following additional measures to ensure full compliance with ESS 5:

- Consider vulnerability factors or specific support to PAPs facing difficulty in restoring their activity because of age, gender, health issues, or disability. This support can take the form of

additional land or structure development, or linking these PAPs to supportive social networks, government services or non-governmental organisations;

- Ensure that livelihood restoration measures considers not only right holders such as owners of structures, heads of fisheries, or heads of households, but also the broader economic activities affected by the economic displacement. This is notably the case of women who will lose their only economic activity after the displacement of the fishery in Dans Coco;
- Engage with PAPs to identify transitional support measures since they have been resettled without immediate opportunity to restore their livelihood. This support can take the form of free lease for the period of time when they have no access to agricultural land and adequate grazing space in Les Salines, the provision of material to facilitate their livestock breeding or fishing activities;
- Explore new livelihood alternatives that could improve the impacted households' incomes, such as training and material support to start a small business (catering, food transformation, petty trade). Several women in affected households have already started such activity which helps them to mitigate the impact of the resettlement;
- Consider spouses and children in households as beneficiaries of livelihood restoration activities, since they often take part to livestock breeding, agricultural works and fishing activities. This will limit the financial burden on impacted households, notably when heads of households have reached an age when they cannot undertake a training for a new livelihood activity.

■ Suggested improvements for an effective institutional framework

The audit has shown the limits of leaving the RAP design, implementation and monitoring solely within RRA's responsibility. To improve the effectiveness of the RAP's and to ensure full compliance with World Bank ESS 5, it is suggested that AML/ARL takes the lead on the further implementation of activities, including community engagement and livelihood restoration, as well as monitoring. This will be carried out more particularly by the environmental and social specialist within AML's PIU. For a smooth transition, it is suggested that:

- PIU will raise awareness of RRA that ARL is responsible for overseeing the implementation and monitoring of the RAP uncompleted items, including community consultation and livelihood restoration;
- PIU will raise awareness of PAPs that AML is responsible for overseeing the implementation and monitoring of the RAP uncompleted items, including community consultation and livelihood restoration;
- PIU will maintain close relationship with the RRA to ensure that livelihood restoration activities are appropriate from a technical point of view and aligned with Rodrigues' development priorities;
- PIU will closely collaborate with the RRA to obtain all documents relating to historical aspects of the RAP and to solve issues related to livelihood restoration activities, including with the Commission for agriculture, livestock breeding and fishery.

■ Planning, implementation and monitoring of the RAP

To fully comply with ESS 5, the RAP must be revised to include a robust monitoring and follow-up system. It is intended to ensure that the actions proposed in the RAP are implemented as planned and within the established deadlines and that the expected results are achieved.

This system contains various monitoring and evaluation measures to be carried-out to ensure the smooth implementation of the present and future RAP and their impacts on the PAPs. Internal monitoring will be carried out by AML PIU, while external evaluation will be the responsibility of a consultant that AML will recruit.

The internal monitoring considers the implementation of the resettlement and measure:

- The level of implementation of the RAP, including financial monitoring, as a whole;
- A timeline for the implementation of monitoring and evaluation activities (sequences, frequency) applicable to each activity. A timeline for the implementation of monitoring and evaluation activities (sequences, frequency) will be applied to each displacement operation induced by the Project;

- To visualize, especially cartographically, the progress of the process and the land released;
- To measure the quality of the execution and to verify if the principles of acquisition are respected, if the deadlines of implementation are adequate and the actions effectively set up;
- To monitor the impacts of the implementation of the steps on the PAPs, from a socio-economic point of view. The tools also make it possible to identify vulnerable people, in order to take corrective measures and provide them with the necessary assistance.

An external evaluation will be carried out on a regular basis throughout the activities of the PIU, in order to assess their compliance with AML's commitments in terms of land acquisition, compensation and resettlement and their impacts on the living standards and conditions of the PAPs. Finally, at the end of each relocation operation, a completion audit, addressing the same issues and objectives, will be financed by AML and carried out by an external service provider, according to specific terms of references.

It is suggested that the follow-up and monitoring of the RAP implementation can be done through the table below, with indicators to be determined in the updated RAP. Note that given the urgency for persons already relocated, activities related to payment of compensation, establishment of livelihood replacement activities and assessment of PAP outcomes to be monitored monthly for one year, by which time a completion audit should be carried out.

Table 6 : Suggested dashboard for RAP monitoring, to be completed in the RAP

Theme	Indicator	Type of monitoring	Frequency
Monitoring of PAPs who accepted a monetary compensation	Number of PAPs identified	PIU to contact PAPs directly	Monthly
	Number of vulnerable PAPs	PIU to contact PAPs directly	Monthly
	...		
Monitoring of physically and economically displaced PAPs	Number of PAPs per category	PIU to contact PAPs directly	Monthly
	Number of PAPs who signed a contract with AML/ARL	PIU to contact PAPs directly	Monthly
	...		
Monitoring of PAPs conditions and livelihood	Number and percentage of PAPs who have started agriculture/livestock breeding/fishing/trade	PIU to contact PAPs directly	Monthly
	Level of income of PAP	PIU to contact PAPs directly	Quarterly
	...		
Community engagement (to be included as part of project SEP)	Number of meetings organized	Track SEP implementation	Quarterly or as circumstances require
	Number of communication campaigns launched through radio	Track SEP implementation	To be established in SEP

...

Financial Monitoring of compensations	Amount foreseen for compensations	PIU to contact PAPs directly	Monthly
	Amount paid	PIU to contact PAPs directly	Monthly
...			
Grievance monitoring (as part of project GRM)	Number of complaints registered	Track GRM implmentation	Quarterly
	Number of complaints by topic/issues	Track GRM implmentation	Quarterly
...			

5. Conclusion

The audit of the Resettlement Action Plan developed by RRA indicates that the RAP aligns with several of ESS 5 requirements.

The RAP has respected several procedural requirements set by ESS 5, notably through a solid engagement with impacted communities at the planning stage to define the resettlement conditions and the involvement of relevant administrative authorities. Additionally, the RAP provides a complete census and inventory of impacted assets, as well as a description of the PAP's socioeconomic baseline (except data on income level).

Regarding physical displacement, the strength of the RAP consists in the compensation in kind at replacement cost, improvement of PAP's housing conditions and access to basic services, and security of tenure through the formalization of long-term lease. Regarding economic displacement, the strength of the RAP consists in the compensation in kind of lands and impacted assets, the proposition of livelihood restoration activities and support such as land development and training to new activities.

Other issues remain challenging such as community engagement and follow-up, grievance management, and livelihood restoration.

This section reflects on the identified gap to provide the main issues to be considered in the future physical and economic displacement induced by the Project.

The first issue is that involuntary resettlement does not solely consists in the relocation of impacted populations from one place to another. Involuntary resettlement must aim at ensuring that it does not negatively affect but improve the PAPs' livelihoods. This implies notably adequate planning articulated with available land and natural resources, time constraints, and with the Project construction works and activities:

- The physical displacement must be articulated with economic displacement. In the case of this RAP implementation, the physical resettlement without immediate access to agricultural land and adequate grazing structures for livestock breeding had a detrimental effect over the PAPs' livelihood since they are not able to maintain their economic activities. It is therefore key to ensure that physical resettlement takes place when PAPs will be able to keep practicing their activities;
- Monetary compensations for lost assets must be paid prior resettlement. It is not recommended to resettle impacted households without payment of compensations for lost structures, trees or other assets;
- The physical displacement must ensure that PAPs are provided with tenure security. In the case of this RAP, the delivery of leases should have immediately followed the relocation;
- Engagement with affected community must not stop once the planning and physical resettlement have been completed. In fact, engagement with affected communities must continue over the long term to ensure that the impacted households are considered as long as they need support, including in their livelihood restoration. This is key to avoid PAPs feeling that they have been ignored or manipulated;
- All issues raised above can be even more detrimental to the Project's support when the construction activities are delayed and do not start sooner after the resettlement. Indeed, PAPs feel that they could have been resettled later and would not have had to bear the hardship of resettlement while no construction works take place. The resettlement must therefore take place in the good timing with the Project construction activities;
- Finally, it is not recommended to provide replacement assets that exceed living standards in the communities since this can set unnecessary precedent and create resentment toward those who benefit from the resettlement, whereas challenging issues such as livelihood restoration are not visible.

The second key issue is that any resettlement must lead to the development of a RAP that will be disclosed and which will frame the resettlement over the long term. The RAP must include the following elements to address negative impacts of the Project on communities' quality of life and livelihood are ensure conformity with World Bank's ESS 5:

- The RAP must refer to applicable international standards, which is ESS 5, to ensure that all issues are addressed in the RAP and risks related to resettlement will be mitigated; TORs for all future project-related RAPs meeting ESS 5 requirements must be developed and shared with the World Bank for non-objection prior to beginning RAP activities.
- A detailed social baseline of impacted households, which will provide data to nurture the implementation monitoring. These data shall include socio-economic data such as level of income, activities, sanitary and housing conditions, health, access to infrastructure services, level of education, and equipment of impacted households.
- References and documentation of all key dates such as cut-off date, inventory and census in appropriate form, to avoid eligibility claims further during the Project;
- Clear and transparent methodology for compensation calculation, which considers replacement costs and not only market value of the impacted asset;
- No reference to the individual PAP's compensation amount or value of replacement structures since the RAP intends to be publicly disclosed;
- Robust follow-up so that it is possible to monitor the PAPs' situation, take all necessary corrective measures, and close the RAP when PAPs have fully restored their livelihood.

Finally, the last key issue that should be considered in future resettlement regards solid engagement of affected communities. Community engagement must consider the following:

- Communities must be engaged during resettlement planning, implementation, and monitoring, particularly during livelihood restoration activities since these require time and regular support;
- Community engagement must involve host communities, including through dedicated consultations;
- Ensure specific engagement with women since they can be impacted by the resettlement in a different way. Specific focus group discussions with women can provide more free discussions, but can also inform possible alternative livelihoods to be considered;
- Engage with PAPs on their specific need or challenges because of health, gender, age or disability. Whereas this may not be appropriate during public consultations, such issue can be raised during census or interviews. Discussing vulnerability factors with PAPs may help to better define support measures that must be included in the RAP;
- A grievance mechanism must be put in place at the outset of the RAP design and implementation, to ensure that all grievances are collected and addressed, which will improve the RAP implementation.
- Avoid promises that will not be kept or not documented as it has been the case with the compensation for moral damage that seems to have been promised orally during the resettlement planning.

Annex 1: Minutes of consultations and interviews carried out for this audit

Date	14/03/2023
Places	Coral Plain
Contact person(s)	Heads of households displaced from Sainte Marie
<p>Stakeholder Engagement</p> <p>There was good stakeholder engagement in the preparation of the RAP. But since the resettlement and especially after the change of government, there are more difficulties to communicate. At present, they do not know who to go to because there is no identified contact person. Before, they used to go to Madame Pamela, but since the transition, there is no more contact. There has been no follow-up of their situation and they think that this is a pity.</p> <p>The best way to mobilize and engage them, they said, is through phone calls to get the word out, and to meet with them personally. We can also get the information out through the village presidents.</p> <p>Concerning the management of complaints, they want to have the possibility to file the complaint in a personal way, in front of a well defined interlocutor. For the moment, they have not had any response to their various complaints.</p> <p>This prompted them to make a petition in triplicate but it has remained unanswered to date; these petitions were sent to the Public Infrastructure Commission, the Environment Commission and the Chief Commissioner's office.</p> <p>Concerns about the project</p> <p>The first fear mentioned is that before, they were involved in the Project. Now they feel they are being left out.</p> <p>They feel strongly that they were simply manipulated to clear the field and get the funding.</p> <p>Physical relocation</p> <p>They are all satisfied with their resettlement because they live in better conditions. They have access to basic services (water, electricity, sanitation, transportation). Almost all the households moved in 3 years ago, except for one person who moved in 2 months ago.</p> <p>The quality of construction is satisfactory, but one person has had flooding on his property.</p> <p>There was no eviction.</p> <p>They are waiting for confirmation of the leases, but they are confident.</p> <p>They had no problem with the inhabitants of Plaine Corail.</p> <p>Economic relocation</p> <p>For them, it's a mess. No one has sufficient grazing space (lack of food) or land for agriculture. The majority of households have kept the livestock activity in Sainte Marie; but moving is long and expensive. It is difficult to transport fodder from Sainte Marie to Plaine Corail. Before, everything was next to their house. Now it is different.</p>	

In Sainte Marie, they had been able to establish a system of exploitation of the spaces based on the pluriactivity (fishing, agriculture, breeding...) or the resettlement and the Project broke this dynamics. In the end, all agree that their situation has worsened and that the Project does not include them.

Transition

They did not receive transitional assistance, despite their request.

Vulnerability

They all feel they are on the same level. They don't see a factor that would disadvantage some PAPs over others.

Follow-up

There is no follow-up of their situation. Some find themselves with spaces that are much too small for their herds. This forces them to reduce the size of their herds, which implies a decrease in income. This is also a consequence of the distance from the land.

They believe that adequate follow-up should be monthly at first, and less frequent thereafter.

Date	15/03/2023 - 9h00
Places	Coral Plain
Contact person(s)	Jean Bernard Sainte Marie

Physical relocation

Regarding the physical relocation, he is satisfied with the conditions. The house is of satisfactory quality, he has better access to basic services (electricity, sanitation).

One of the problems he encounters is the lack of water during the dry season, although this is a problem specific to Rodrigues, but the water resource was more important where he lived before. Access to the road is also a problem, it is a dirt road with a steep slope that gives access to his house below and during the rainy season it is extremely slippery, the majority of vehicles can not have access. It was agreed that the access would be made into a paved road.

Economic relocation

The conditions for the relocation of their economic activities are not satisfactory according to him.

First of all, the enclosures that have been allocated are not sufficient for his livestock: "The shelter for the sheep can only protect three or four heads. It is a waste of money according to him because what was proposed is not adapted. "We are heading straight for a wall, it will not be possible to continue under these conditions. It is the end of a cycle". Thus, his animals still graze in Sainte Marie because the lack of fodder and water on the place attributed makes it impossible, according to him, to practice breeding in a sustainable way. He had already warned that it would not be big enough during the design phase but this was not taken into consideration.

On the other hand, he feels that his situation has deteriorated since the relocation. The relocation away from Sainte Marie makes it difficult to reconcile agriculture and livestock as it was before. The distance from the grazing area causes additional expenses in gasoline and requires additional time.

This loss of time has an impact on his propensity to practice several activities that were previously complementary. While the situation is more or less sustainable now that his livestock is still in Sainte Marie, he fears that once he is raising livestock in the allocated paddock, the situation will be very difficult. They have discussed the need to anticipate this transition with the Agriculture and Livestock Commission, but his requests have gone unheeded. Overall, he laments the lack of a land use plan for livestock in Rodrigues.

He believes that another option must be considered for the restoration of his livelihood. He feels that he should turn to agriculture.

Finally, he added that he understands the fears of the residents of Plaine Corail, which makes it even more difficult to resume farming.

Follow-up

No follow-up has been done, which he deplors. The change of government in Rodrigues does not make things easier.

Date	15/03/2023 - 10h00
Places	Coral Plain
Contact person(s)	Georges Sainte Marie Family

Physical relocation

Regarding the physical relocation, they are satisfied with the conditions. The house is of satisfactory quality, they have better access to basic services (electricity, sanitation).

They encounter difficulties with water supply in dry periods, certainly this is a problem specific to Rodrigues but the water resource was more important where they lived before. Because of this, they have to return to Sainte Marie to do their laundry and restrict their water consumption.

One concern, which only affects this family, is the lack of drainage and runoff under their plot. During heavy rains, their plot is flooded.

Finally, the household says that the road that was supposed to be built has not been, which makes it difficult to move around during rainy periods and creates dust during dry periods.

Economic relocation

The conditions for the relocation of their economic activities are not at all satisfactory according to them. First, they have maintained their livestock activity in Sainte Marie because they have not yet had access to the developed enclosure. This results in a loss of time due to the distance (one hour's walk to get to the site), which affects their way of life (getting up earlier, difficulty in reconciling breeding and family life...). This is particularly difficult during the breeding season when the attention to the animals is more important.

On the other hand, the space provided is not large enough for the current size of their herd. He will have to reduce his herd, which will obviously have economic consequences.

Finally, they complain about the lack of transparency in the allocation of agricultural plots. According to them, some inhabitants (neither from Sainte Marie nor from Plaine Corail) have obtained access to plots of land even though they do not necessarily practice agriculture, to the detriment of the people affected by the Project. This reinforces the feeling of injustice and deception.

One suggestion for restoring household livelihoods is to accompany the children of the household, who often work in the fields, in finding employment, especially at the airport, or creating an entrepreneurial project. This will take the burden off the household as parents will have less to worry about their children's future. Programs are already in place in Rodrigues and these programs could be extended to PAPs or their children. Since relocating, they say they have had to dip into their previous savings to provide for the household.

Transition

The head of the household has asked for financial support for the transition period, but has not received a response. In any case, he would like to receive support with as little involvement from the RRA as possible, as he believes this contributes to the waste of aid.

On the whole, the position is quite firm and the tension is palpable: "At present, my whole family depends on my herd to live. I will not move into the prepared enclosure until the conditions for maintaining my livestock are satisfactory". He even considered the idea of contacting the Mauritian press in order to move things forward and highlight the situation of the displaced families before finally retracting his request so as not to give a negative image of Rodrigues Island.

This position is also tinged with dismay and resignation: "We don't ask for much, but at least a means of subsistence".

Follow-up

No follow-up was done, the services only came once after the houses were built. They deplore this lack of follow-up.

Date	15/03/2023 - 11h00
Places	Coral Plain
Contact person(s)	Ronald Sainte Marie Family

Physical relocation

Regarding the physical relocation, they are satisfied with the conditions. The house is of satisfactory quality, they have better access to basic services (electricity, sanitation).

They encounter difficulties with water supply in dry periods, admittedly this is a problem specific to Rodrigues, but the water resource was more important where they lived before; water is available about 7 months out of 12. Because of this, they ration their use (washing clothes less).

In addition, the household says that the road that was supposed to be built has not been, making it difficult and dangerous to move around in the rainy season and creating significant dusting in dry periods with the frequent passage of vehicles to the fishery below.

Economic relocation

Prior to resettlement, the main activity of the household was fishing, livestock raising and market gardening. His wife was also involved in farming and animal husbandry.

According to them, the conditions for the relocation of their economic activities are not satisfactory. They have maintained their livestock activity in Sainte Marie because :

- The enclosure is not big enough. Their herd is too large, and other breeders also come to this place. Because of this, they have reduced the size of their herd by stopping the breeding of goats. This trend will have to continue because their herd is still too large.
- There is no fodder, so it is particularly complicated in times of drought.
- The breeding being in Sainte Marie, it generates additional expenses (gasoline for displacement) and time.

In addition, they have not received any compensation for the fruit trees they own in Sainte Marie. The agricultural services have come to make an inventory, but no scale has been established and to date no compensation has been proposed. This is a loss of opportunity because they no longer have the time to go to Sainte Marie to harvest the fruit, which is eaten for the most part by roaming animals (no guarding possible).

The proposal for livelihood restoration (enclosure, with irrigation) is not suitable because the area is too small and does not contain fodder. The space originally dedicated to fodder production (this was a project that was not included in the agreement) has been reallocated to another project, so no one knows what is happening to the herders' fodder supply.

Changing their activity is not an option for them, especially after a certain age. The whole family depends on livestock. Their two sons who participate in the livestock activities are also affected but they are interested in a job (plumbing, electricity or masonry) and training.

Transition

The head of the household requested financial support for the transition period, but did not receive a response.

On the whole, the position is quite firm and the tension is palpable: "At present, my whole family depends on my herd to live. I will not move into the prepared enclosure until the conditions for maintaining my livestock are satisfactory".

Follow-up

No follow-up has been done, which they deplore. Moreover, the change of government makes it very difficult to follow up on the files: "The former Island Chief Executive was a volunteer but he is no longer in office and has even left Rodrigues.

Date	15/03/2023 - 12h00
Places	Coral Plain
Contact person(s)	Parkinson Family Sainte Marie

Physical relocation

Regarding the physical relocation, they are satisfied with the conditions. The house is of satisfactory quality, they have better access to basic services (electricity, sanitation)

They encounter difficulties with water supply in dry periods, certainly it is a problem specific to Rodrigues but the water resource was more important where they lived before.

In addition, the household says that the road that was supposed to be built has not been, which creates significant dust in dry periods with the frequent passage of vehicles that go to the fishery below. They have to keep the doors and windows closed because too much dust enters the house, which is not an easy situation because it is so hot in the house.

Economic relocation

They have not been compensated for the fruit plants that will be lost. While there was an inventory of these trees, which took place with the PAPs, no price was given and no compensation was paid.

The head of the household is a policeman. His wife supports him in agricultural activities but this is rare.

Before the relocation, in addition to his job as a civil servant, the main activity of the household consisted of fishing, breeding and market gardening. After the relocation, the activities remain the same, but they are less profitable because it is more expensive to travel to the activities (increased distance coupled with the sharp increase in fuel costs).

Regarding livelihood restoration activities, he thinks that what has been proposed is not entirely viable because it is difficult to access fodder: the proposed collective livestock area is too dry and the area that was initially planned to allow fodder harvesting is finally dedicated to another project. They are left with a grazing area without access to forage. Given the size of the paddocks, he will have to reduce his livestock activity (thus reducing the size of the herd). He has already reduced his flock and currently has 3 sheep.

The land was granted without much consultation according to him.

To compensate for the loss of income, he thinks that it will be necessary to do training to change the type of livestock, especially poultry, an activity that will be more in line with the space that has been offered.

Transition

No transitional support given to PAPs, but believes it is necessary given the nature of the proposed livestock shelters.

Follow-up

No follow-up has been done, which he regrets.

Date	15/03/2023 - 13h10
Places	Coral Plain
Contact person(s)	Family Robinson Sainte Marie

Physical relocation

Regarding the physical relocation, they are satisfied with the conditions. The house is of satisfactory quality, they have better access to basic services (electricity, sanitation).

They encounter difficulties with water supply in dry periods, certainly it is a problem specific to Rodrigues but the water resource was more important where they lived before. According to them, a filled basin can provide water for a month and a half by rationing.



In addition, the household says that the road that was supposed to be built has not been, which creates significant dust in dry periods with the frequent passage of vehicles that go to the fishery below. They have to keep the doors and windows closed because too much dust gets into the house, which is not an easy situation because it is so hot in the house. The Island Chief Executive had promised to make the road in September 2021 but this has not been done.

Economic relocation

They have not been compensated for the fruit plants that will be lost. Although an inventory of these trees was conducted with the PAPs, no price was given and no compensation was paid. In addition, they were offered a single, less well-equipped livestock pen (their livestock space was separated into three separate parts for the different types of livestock - pigs, goats and sheep) so they refused to sign the contract. Finally, they were promised (verbally) financial compensation/assistance for the "uprooting" caused but received nothing.

Overall, the household says its situation has worsened.

Prior to the resettlement, the main activity of the household was animal husbandry (chicken, cow, goats, pigs) and agriculture (corn, pistachio). Their three children worked with them. After the resettlement, the activities remain the same.

Concerning the breeding, it is always practiced in Ste Marie because it does not have a pen, that those proposed are too small, and that the ground is not adapted (too little grass, no fodder). Because of this and the fact that there will be no room, they have stopped raising pigs. They have only about 50 animals left. They receive a pension, so the family depends mainly on this pension and the income from the pig farm, which does not give them much anymore, hence the anxiety about this situation, especially for their children. Finally, they do not see much interest in breeding anymore because it is more expensive to go to the activities.

Concerning agriculture, they can no longer practice this activity because they no longer have the right to plant in the Sainte Marie area. In addition, they are no longer present enough on the site to supervise the crops, which are then damaged by the animals. Finally, the proposed farming site is not yet ready.

Given the difficulties of continuing to raise livestock in the area, they suggest helping households by supporting children in finding employment/training either to work on the airport site or to start an activity.

Transition

No transitional support given to PAPs despite requests. No action taken.

Follow-up

No follow-up has been done, which he deplores. They tried to contact the administration via Mr. Carlo Botsar but there was no response: "We are told that the files were lost during the government handover".

Date	15/03/2023 - 14h20
Places	Coral Plain

<p>Contact person(s)</p>	<p>Roland Sainte Marie Family</p>
<p>Physical relocation</p> <p>Regarding the physical relocation, they are satisfied with the conditions. The quality of the house is satisfactory despite defects in the windows (they don't close properly and water gets in during cyclones), they have better access to basic services (electricity, sanitation)</p> <p>They encounter difficulties with water supply in dry periods, certainly it is a problem specific to Rodrigues but the water resource was more important where they lived before.</p> <p>In addition, the household says that the road that was supposed to be built in front of their house was not built, which makes it difficult to move around in case of rain (mud). There was no follow-up after rehousing, so it is difficult to report defects.</p> <p>Economic relocation</p> <p>They were not compensated for the many fruit trees they had in Sainte Marie. While there was an inventory of these trees, which took place with the PAPs, no price was given and no compensation was paid. In addition, the couple reports a gross irregularity in the inventories of the breeding enclosure: with the previous administration, the enclosure was inventoried but the file was lost. After a cyclone, a visit from the new administration conducted the inventory and therefore did not take into account what they had previously owned because the structures were torn down by the cyclone. The previous file cannot be found and they are now being offered minimal compensation (because it is considered that there was no enclosure).</p> <p>Overall, the household is not satisfied with the livelihood restoration activities and says that its situation has deteriorated.</p> <p>Prior to resettlement, the main activity of the household was livestock and agriculture. Their children worked with them. After resettlement, the activities remain the same but are less profitable.</p> <p>Concerning the breeding, it is still practiced in Sainte Marie because the proposed enclosures are too small, and the soil is not adapted (no grass, no fodder). Because of this and the fact that there will be no space, they have stopped raising pigs and geese. They refused to sign the contract, but the contractor still developed the plot allocated to them. In this respect, the head of the household will refuse to move his livestock if the shelter built is not bigger. He is willing to reduce his activity, but it must remain reasonable. This creates a lot of anxiety for them with regard to the future of their children.</p> <p>In terms of additional support, they believe that training in new livestock techniques can help improve their lot. Support can also consist of the provision of equipment (tractors, power tillers) to improve their farming activities. Support should also be provided to children (employment, training, support in finding work).</p> <p>The household wished to draw the attention of the experts to the lack of transparency in the allocation of enclosures: according to them, some people who do not live in Plaine Corail have benefited from enclosures, whereas the inhabitants of Sainte Marie should have benefited in priority given their situation.</p> <p>Transition</p>	



No transitional support given to PAPs despite requests. No action taken.

Follow-up

No follow-up was done, which they deplore. They were not supported by the administration in their dealings with the manufacturer. This lack of follow-up has worsened with the change of administration as it seems that the files are lost.

Date	16/03/2023 - 12h00
Places	Coral Plain
Contact person(s)	Ludovic and Sam Yow Larchet

Physical relocation

Regarding the physical relocation, they are satisfied with the conditions. The quality of the house is satisfactory despite an inconvenient electrical installation and some defects on the windows and door through which water manages to penetrate in cyclonic weather. They have better access to basic services (electricity, sanitation).

They encounter difficulties with the water supply in dry periods, admittedly a problem specific to Rodrigues, but the water resource was more important where they lived before. In addition, the household says that the road that was supposed to be built has not been, which makes it difficult to move around in case of rain (mud). Finally, the house is located in a place that is completely exposed to the sun, and in the absence of a veranda, the mother of the head of the household is forced to stay inside all day, she who used to enjoy the shade of her trees when she was in Sainte Marie. There is no follow-up, so it is difficult to report defects.

Economic relocation

They have not been compensated for the fruit plants that will be lost. There was an inventory of these trees, which took place with the PAPs, but no price was given and no compensation was paid. Since they live further away, they cannot follow the crops and the animals spoil the fruit, which represents a loss of income.

Overall, the household is not satisfied with the livelihood restoration activities and says its situation has deteriorated.

Prior to relocation, the main activity of the household was fishing, livestock raising and then agriculture. These activities complemented each other through seasonality. After the relocation, the household stopped farming because it is no longer compatible with the time required to travel to the grazing and fishing areas. His wife started a small catering business near the house (the main customers are airport employees and fishermen), at her own expense and without support.

Concerning the breeding, it is practiced in Sainte Marie because he did not have an enclosure: he signed an agreement but did not yet have a contract proposal. Moreover, the distance from the grazing area means that he cannot supervise his animals, some of which have been eaten by stray dogs. This represents a loss of income.

Concerning fishing, he lives further away from his place of activity, which causes expenses in gasoline to reach his boat and to navigate. Nothing was offered to him in exchange, he says.

Regarding livelihood restoration, he does not know what is viable for livestock raising because the proposed grazing area does not offer fodder opportunities and the fodder is not transportable. He is willing to train for another type of livestock or activity. As for fishing, he does not wish to stop his activity and he has no solution to propose.

Transition

No transitional support given to PAPs despite requests. No action taken.

Follow-up

No follow-up was done, which they deplore. This lack of follow-up has worsened with the change in administration as they do not know who to contact.

Date	16/03/2023 - 13h10
Places	Coral Plain
Contact person(s)	Margéot, Arlette and Jean Norbert Sainte Marie

Physical relocation

Regarding the physical relocation, they are satisfied with the conditions. The house is of satisfactory quality despite some defects on the windows, they have better access to basic services (electricity, sanitation).

The household says that the road that was supposed to be improved (including lighting) has not been, which makes it difficult to move around in the rain (mud) and creates dust during dry periods.

Economic relocation

They were not compensated for the fruit trees they had around their house in Sainte Marie. While there was an inventory of these trees, which took place with the PAPs, no price was given and no compensation was paid. In addition, they had built a park specifically for pigs, but the proposed replacement did not include these specific structures.

Overall, the household is not satisfied with the livelihood restoration activities and says that their situation has deteriorated. They think that it will be impossible to return to the original situation.

Prior to resettlement, the main activity of the household was fishing, livestock raising and agriculture. These activities complemented each other due to the seasonal effect. The woman works as a cleaner at the airport.

After resettlement, the household stopped farming because they did not receive the promised land, despite the agreement.

Concerning the breeding, it is still practiced in Sainte Marie because the proposed enclosure (and more particularly the shelter intended for the sheep) is not made in a way adapted to their breeding: the shelter must be completely closed to offer a complete protection to the sheep which are very sensitive to the rain and the wind. The proposed shelters already built have too much open space between the wall and the roof, which is not at all viable for the sheep. They say that they were never consulted in the making of the shelters and that their comments during the construction were not listened to. In addition, they point out that the new dedicated area is too limited because there is no fodder. They think that raising livestock is not profitable because they will have to transport the fodder, or pay for feed, and transporting inputs is more expensive. For these reasons, they will reduce their livestock activity. According to them, there has been confusion in the space allocated to livestock keepers: some who have few livestock have a large enclosure and shelter, while those who do a lot of livestock keeping have been left with little space. In any case, they will not be able to raise more than ten sheep in the space allocated to them, whereas they currently have about fifty.

Transition

No transitional support given to PAPs despite requests. No action taken.

Follow-up

While they state that the follow-up during the construction of the house was very good, no follow-up was done for the construction of the livestock structures, they were never able to reach the engineer who never came, which they deplore. They feel that they were not sufficiently involved in the design/construction. They felt that the administration in charge of the livestock structures was not responsive enough. This lack of follow-up has worsened with the change of administration because they no longer know who to contact.

Date	18/03/2023 - 10h00
Places	Coral Plain
Contact person(s)	Christian and Sylvie Varta Sainte Marie, and their son Arnaud

Stakeholder Engagement

It is difficult to contact Mr. Botsar to share their problems or concerns.

Concerns about the project

According to them the whole process takes too long. They had a lot of expectations and thought they could start a small business in connection with the influx of tourists but as it takes too much time, they lose hope and motivation.

Physical relocation

They are satisfied with their relocation. Only, they would like to have the lease because without this document, they cannot start a business.

Compensations

There have been inventories of their structures done, but they have not built the equivalent of what they had before (notably the pen to raise chickens, pigs and goats simultaneously). There has also been an inventory of their plants, but again they have not been paid.

Economic relocation

Before, the household practiced fishing, breeding (pigs, chickens, goats), and agriculture. Her son is a fireman. She also had a business (processing, making and selling food products) but as they were far from the road, it was difficult.

Now, the household says that their standard of living has decreased even though it is now easier to sell the food products they make (cakes and crystallized fruits).

Concerning the breeding: they almost stopped this activity. Their henhouse has remained in Sainte Marie. They still do not have access to the enclosure at Les Salines, so they have sold their animals because it is too far for them and they do not have the time to look after them. They do not intend to resume this activity because they know that the enclosure that was built by the administration is not adapted to their breeding practice because it is too small, without fodder, and not separated for the different animals. For this reason, Christian Sainte Marie did not sign the agreement.

Concerning fishing: the income from this activity has decreased because the place is further away: this causes additional expenses and a demand for time that they can no longer dedicate to other activities.

Concerning agriculture/farming: they have stopped because they have not yet received a farm plot.

The only business that has improved is the Madam's business because it benefits from a greater proximity to the road.

Regarding livelihood restoration activities:

They want support to start another business: training, financing assistance, materials/equipment.

For fishing, a transitional help to pay for gasoline would be welcome, the time to start this activity again; then they will manage.

For livestock, they want their plot to be developed for poultry farming, which is an activity that has already been carried out here.

Transition

They did not receive any assistance for the transitional period, which was very important for them because they could not practice agriculture and had to reduce livestock.

Follow-up

There is no follow-up on their situation.

Date	18/03/2023
Places	Coral Plain
Contact person(s)	Jean Harel and Marie Stéphanie Sainte Marie
<p>Physical relocation</p> <p>They are happy with their new home. However, there are problems with the windows: during cyclones, water enters the house. In addition, the access road is not laid out as a rout or 'track-road', which makes it almost impossible to access the house during the rainy season when they need it, as Mrs. Marie Stéphanie Ste Marie needs regular health care.</p> <p>They asked to formalize a lease for their children but there was no response.</p> <p>They are quite sad to have left a tree in their yard of Sainte Marie, it has a great sentimental importance for them. However, they return to visit it from time to time, before it disappears permanently.</p> <p>Compensations</p> <p>There have been inventories of their fruit trees but they have not been paid for them. They also claim that they were promised compensation for the moral damage of being uprooted, but this oral promise has not been fulfilled.</p> <p>Economic relocation</p> <p>Before, the household practiced fishing (Jean Harel Ste Marie), breeding (pigs, chickens), and agriculture (market gardening). The annual income from agriculture alone was 35,000 MRU. The children worked in the fields and with the animals.</p> <p>Now, the household claims that their standard of living has decreased.</p> <p>Concerning the breeding: they almost stopped this activity: they have only one pig (against 5 or 6 before) and stopped the poultry breeding.</p> <p>Concerning agriculture: they have stopped because they still do not have access to the promised land.</p> <p>Finally, the household lives only from fishing and small jobs.</p> <p>Jean Harel Ste Marie applied for a motor as compensation to help him continue fishing now that he is located much further from his fishing area, but he has not heard back.</p> <p>Regarding livelihood restoration:</p> <p>They are not satisfied with the proposed activities because the places dedicated to these activities are too far away. They would like us to help the children find work because they are now unemployed. These activities must also remain close to the place of residence in order to be able to quickly assist Marie Stéphanie Ste Marie who may be in danger because of her health problems.</p> <p>For fishing: material support (new engine) would be useful.</p>	

For the breeding: a reorganization of the space for the poultry breeding would be interesting.
For agriculture: they would like a closer parcel because the one allocated to La Boucherie is one of the most distant.

Transition

They did not receive any assistance for the transitional period, which was very important for them because they could not practice agriculture and had to stop breeding.

Follow-up

There is no follow-up on their situation. They don't know who to contact. "We don't want problems with the government. We have sacrificed ourselves, we accept it. We just want to have something to live on.

Date	18/03/2023
Places	Coral Plain
Contact person(s)	Antonio Larcher and Nazline Gontran

Physical relocation

Antonio Larcher is satisfied with its reinstallation. The only thing missing is a road or track-road, because access to the main road in rainy periods is quite complicated. Moreover, access to water was better when he was on Sainte Marie (because there were fewer people in the locality).

Compensations

There have been inventories of his fruit trees but he has not been paid. He also claims that he was promised compensation for the moral damage of being uprooted, but this oral promise has not been fulfilled.

Economic relocation

Before, he practiced fishing (seine, trap and octopus), breeding (chickens, goats and pigs), and agriculture (market gardening).

Now, Antonio Larcher says that his income has decreased. He still fishes (he is the chief boatman of the Capdor fishery now in Les Salines), very little livestock but more agriculture.

Concerning the breeding: he stayed in Sainte Marie because the spaces dedicated to the Salines are not adapted for the breeding as he still practices it today. He has reduced his livestock because the additional time required by the relocation no longer allows him to reconcile these activities. In addition, he knows that the proposed space is not suitable (insufficient grazing) and therefore he has reduced by anticipating.

Concerning fishing: the displacement of its activity generates additional costs in fuel because its fishing area is now much more distant.

Concerning agriculture: he stopped because he did not get the promised land.

Livelihood restoration activities

He is not satisfied with what has been proposed, particularly with regard to breeding: the location does not allow for serene breeding in a correct manner (no pasture/fodder). The structure itself is acceptable in his opinion. But the most important thing is that he wants to have a developed area for forage/pasture.

Overall, he thinks that it is becoming difficult to practice livestock in the area: not enough water, and space is decreasing for residential and tourist constructions.

It is for the youth (his niece Nazline who lives in the new house) that he hopes there will be job opportunities through the project.

Transition

They did not receive any assistance for the transitional period.

Follow-up

There is no follow-up on their situation. They have contacted the livestock/agriculture office but nothing, no answer.

Date	18/03/2023 - 15h05
Places	Coral Plain
Contact person(s)	Jean Noël Larcher

Communication/engagement

No meetings or dissemination of information.

For Jean Noël Larcher, TV and radio are suitable means of communication, as well as face to face.

Physical relocation

He is happy with his relocation. Only, in Sainte Marie, he had more space outside the house that was landscaped (porch) and shaded (trees).

Compensations

There have been inventories of his fruit trees but he has not been compensated either for the plants or for the loss of income caused.

Physical relocation

He is satisfied with his reinstallation. However, the road needs to be turned into a road or track-road, because access to the main road during rainy periods is quite complicated. Moreover, access to water was better before (because there were fewer people in the locality).

Compensations

There have been inventories of his fruit trees but he has not been paid. He also claims that he was promised compensation for the moral damage of being uprooted, but this oral promise has not been fulfilled and he does not know how much was promised.

Economic relocation

Before, he practiced fishing (seine and trap), breeding (chickens, goats and pigs), and agriculture (market gardening).

Now, the household claims that its income has decreased, in part because of additional expenses. They are doing the same activities.

Concerning the breeding: he is one of the only ones to have already settled in the Salines, it is difficult because he finds that there is a problem of fodder.

Concerning fishing, he finds it difficult because of the additional costs involved. He fishes with Bruno Capdor with a seine and without a license (trap, line).

Concerning agriculture: he started again on a plot of land close to his home that he developed himself, without asking for authorization. This activity was validated by the administration afterwards, without being registered in the land register. However, he finds it more difficult to cultivate in this new plot because of the lack of water.

Livelihood restoration activities

He is not completely satisfied with what has been proposed:

For fishing, he would like to obtain the adequacy of his building (water conveyance, development of a pier, of the perron) with his fishing activity and to obtain a fishing permit.

Transition

He has not had any particular problems. He has adapted but is resilient because he is still young.

Follow-up

There is no follow-up on his situation.

They contacted the fisheries/agriculture office but nothing, no answer.

Date	18/03/2023 - 12h15
Places	Coral Plain
Contact person(s)	Host Community

Stakeholder Engagement

Information is obtained by word of mouth, or from television and radio.

To communicate, Facebook is not too suitable because older people do not have access to it. They prefer face-to-face meetings so that they have the opportunity to express themselves.

They are not satisfied with the communication and want to be consulted and involved in the follow-up of mitigation measures. For example:

- They claim that their community was not invited to the ESIA report presentation in January 2020;
- They have not received any visits from the administration, not even when it came to finding space for the resettlement of the villagers of Sainte Marie, and they are not aware of the measures from which they will benefit (formalization of livestock spaces);
- They also state that a meeting was held with the community of Saint Mary's and when one of them approached to participate, the official present turned him away. This lack of transparency only creates a sense of injustice.

"We are fine with the airport project, but we should not be victims of it.

They are asking for a meeting only of their community with the airport management.

Concerning the management of complaints and grievances: they have written to the Environmental Commission (old and new) but they have had no response.

Fears and expectations about the project

The first complaint mentioned was the increase in dust due to the construction of houses and structures for the resettlement of the inhabitants of Sainte Marie, and particularly the dirt road leading to the Salines fishery. The increase in vehicle traffic generates dust that prevents them from keeping their windows open in dry periods.

On the other hand, the increase in traffic and workers means that they find more garbage littering the ground. This decreases their quality of life.

The first fears mentioned with regard to the project concern the arrival of larger planes that may cause odors, vibrations, and noise that will generate headaches and disturb their tranquility. They are especially worried about their children. They claim that these nuisances are already causing damage to their house (cracked walls).

Finally, they fear being too close to the airport parking lot and a hotel complex that is under construction (from what they heard on TV).

Overall, they are not sure that the island has the necessary resources to deal with the direct and indirect impacts that the Project will generate. In particular, with regard to access to water, they fear that tourists will benefit first, to the detriment of the communities. Regarding the supply of food, Rodrigues already depends to some extent on imported food; it will be necessary to ensure that tourism does not exacerbate this problem. Finally, they believe that roads will need to be better maintained as economic activity will increase (more fishermen, more tourists, more pollution, more dust).

Concerning expectations: they think that the project will benefit the island, especially in terms of employment for young people and for the craft industry. It should be noted that the delays in the implementation of the Project reduce the motivation to develop an activity.

Physical relocation

They claim to have no problem with the inhabitants of Sainte Marie who were resettled in Plaine Corail. But they only learned about the resettlement project when they saw the land registry officials measuring the plots with the Sainte Marie inhabitants.

Economic relocation

Given the lack of space with the arrival of the residents of Sainte Marie, they estimate that they have decreased their activity by about ¾. They fear that the hotel project they have heard about, which will be 20 ha, will exacerbate this trend. In particular, it will decrease the available forage.

As for agriculture and fishing, they are not particularly impacted, but here again the hotel project could change the situation.

They are not aware of the plans to formalize farm/livestock leases as written in the report.

One person (Marie Lourdes Farla) lost her grazing space to a household in Sainte Marie. The whole process was poorly managed for the following reasons:

- The officials came to measure the space needed to relocate on his parcel without his agreement or prior notification ;
- She notified ICE of her refusal to surrender the parcel on which she has a lease because the grazing area was already prepared and she needed it for her cattle;
- ICE would have told him that they were not aware of the project on this parcel;
- She has not received any letter allowing her to prepare to vacate the premises;
- The environmental police came to tell her that she had one day to free the space, which created a strong psychological pressure on this person: she assimilates it to a displacement;
- The contract was only offered after she vacated the premises;
- The contract is written in English, which she does not understand (she prefers French);
- She had a verbal promise that her pen would be built, but it is not;
- None of his complaints have been acted upon;

She received 30,000 MRU as compensation for the lost fence. In the end, the plot she received in exchange is poorly developed and this constitutes a loss for her.

Date	16/03/2023, 14h00
Places	Les Salines
Contact person(s)	Bruno Capdor and Antonio Larcher
<p>Communication</p> <p>Since 2019, no communication on the Project nor upcoming steps.</p> <p>Compensation</p> <p>They had promised to compensate for the loss of the fruit trees that were located near the fishery in Bangélique, but this has not been done.</p> <p>Relocation of fisheries</p> <p>The location of the fishery was chosen without consulting them. For them, it is not the ideal location but it is one of the only ones available.</p> <p>There are problems:</p> <ul style="list-style-type: none"> • The fishery is located below a slope: during the rains, there are mudflows, which accumulate and complicate access to the boats. The fishermen get silted up to their knees. • Moreover, there are sharp corals, which are dangerous for fishermen and can damage boats. 	

- Regarding the building built for fishermen to store their engines, the stoop is too high (nearly 80 cm) and without stairs to climb, so that fishermen can not easily hoist the engine of the boats.
- There is no free access so that fishermen can hoist their boats on the shore during bad weather, the ground is not of sand but of coral relics which damages the boats.

Faced with this situation, they asked to build a pier to facilitate their activities.

A remark was made concerning the land granted: it is far too small, leaving no room to store the boats if necessary in case of bad weather. Mr. Capdor therefore enlarged the perimeter of the fishery himself, and put up the fences. It seems that all this was tacitly accepted by the previous and current administrations.)

On the whole, the signed construction contract has been respected except for the access to the water and the development of the road which poses a problem because it causes mud flows which accumulate at the bottom and sometimes makes it impossible for certain vehicles to drive which then remain blocked at the fishery. Moreover, the current is missing in one of the buildings.

It seems that the administration and the manufacturer are blaming each other for the fact that this has not been finalized.

Restoration of livelihoods

He lives less well because he is further away from the fishing place:

- They spend more money to come to this place and to go out fishing (gasoline for vehicles and fishing engines).
- He is in unfair competition with another fishery because because of the distance, he arrives at his fishing spot after the other fishermen, so he has less fish left. Indeed, they can only go to sea between 6:00 and 18:00, so he can not embark a little earlier to compensate for the extra distance.

Bruno Capdor showed definite frustration with the activity of a fisherman who is competing with him. According to him, Mr. Ithier's fishery at Anse Quitor, because it did not accept the location proposed by RAP (at Camp Pintade), initially surrendered its fishing permit and received monetary, technical and material support to change its activity. However, for a reason that is not clear, this fishery reobtained its license and relocated to Pointe Corail, a location that should have been left. According to him, the head of the Ithier fishery therefore surrendered his license, received support and then resumed his activity from a location that should no longer be accessible. This creates unfair and frustrating competition for him. He has submitted a complaint to the fishery commission, but he is not satisfied with the decision because the person can continue to fish and will probably do so for the entire season, at least.

In the end, if he gets the construction of the road as planned, the modification of the stoop, a development of the access to the sea and the construction of a pier, he will be satisfied with the relocation process. This request was made in February 2023 when the keys were officially handed over, the administration promised to settle this within a week but in the end nothing was done.

Follow-up

No follow-up has been done, which he regrets.

Date	17/03/2023, 16h00
Places	Quitor Cove

Contact person(s)	Ithier Fishery
<p>Communication</p> <p>Since 2021 and the change of government, there has been no contact. The fishermen of Anse Quitor (Ithier fishery) at least want to be consulted and heard.</p> <p>Concerning the grievances and complaints: they have made complaints for problems related to the non-payment of wages for public interest work during non-fishing periods.</p> <p>Compensation</p> <p>No compensation for loss of property is relevant.</p> <p>Relocation of fisheries</p> <p>Following the relocation of the Pointe Corail fishery, fishermen claim that they had initially been offered a site at Dans Coco and work had already begun. However, due to the presence of the marine reserve (SEMPA), the previous administration finally changed its mind, stopped work on the Dans Coco fishery and announced that Camp Pintade would be the only location for the new fishery. As they were not satisfied with the proposed location, a system of compensation was proposed to the fishermen to start another activity and return their fishing permits. A majority of fishermen accepted, but Mr. Ithier did not sign the agreement, which led to the cancellation of his fishing license because the fishery in the Anse Quitor area was now closed. Mr. Ithier also claims that he had to sign a paper forcing him to give up his fishing permit without compensation, but he cannot read.</p> <p>The problem with the Camp Pintade site is that there is no transportation that serves the locality at times that are adapted to the fishermen's work rhythm (the buses serve too late and finish too early). In addition, this location is between two reserves, so this pushes them to go fishing further away and therefore there are additional fuel expenses and time. Fishermen do not understand why all the fisheries in the western zone are concentrated in the same area (three fisheries: Les Salines, Camp Pintade - Plaine Mahot and Camp Pintade - Pêcherie Spéville (not relocated)).</p> <p>It is important to note that a whole economic activity is organized around fishing on Anse Quitor. The wives of the fishermen and women of the village sell the fish that they catch nearby, in the lagoon. Fishing and landing the fish elsewhere represents a loss of activity for their wives and people of the village as well.</p> <p>In order to settle in Camp Pintade, they had initially requested that a van be made available to them to move to the fishing site and gasoline to compensate for the distance they would have to travel by motor to get out of the bay to the windward area (to use the sail) but this was not accepted. Moreover, it is for them a situation without solution because the installation in Camp Pintade is not viable, neither for the fishermen, nor for the villagers of Anse Quitor/Dans Coco.</p> <p>Faced with this situation, they continue fishing from the Ithier fishery in Pointe Corail. Mr. Ithier was able to recover a provisional fishing permit with the new government, but his installation at Pointe Corail (on the project footprint) was done without asking the administration's opinion. The authorities ask them to leave the area but they have no other place to go at this time, so they continue their activity in this fishery as best they can.</p> <p>Restoration of livelihoods</p> <p>Before, Mr. Ithier and his men were based at Pointe Corail and were organized as a cooperative. Now they still fish from Pointe Corail but without official authorization, and only two people (including Mr. Ithier) have recently been able to obtain individual permits. The others fish without a license. This limits their income because they do not receive the allowances allocated out of the fishing season</p>	

(closure of the fishery 5 months out of 12) or when they do not have permission to go out to sea for climatic reasons.

They all claim that they have less income and that their situation has worsened, especially since they had to stop fishing for 2 years (because Mr. Ithier did not have a license).

To restore their livelihoods, they all want their situation regularized, which would give them compensation as well. They do not want to settle in Camp Pintade and ask that the fishery that was initially authorized in Dans Coco be rehabilitated. They would reach the fishing area by going along the coast of Pointe Corail to leave the marine reserve.

They felt that they should have received their pay for the off-season, as did those who turned in their licenses, to ease the transition. Fishery employees who worked on public service tasks (canal clean-up...) say they did not receive their full pay (3 out of 4 months).

Follow-up

No follow-up has been done, which they regret.

Date	21/03/2023, 17h00
Places	Bangelic
Contact person(s)	Régis Vaulmally, Laval Vaulmally and Jean Paul Alas

Communication

Since 2019, no communication on the Project nor upcoming steps.

Compensation

The breeders had to be compensated for their breeding pens that were located on the Bangélique strip. For one of the breeders (Mr. Vaulmally and his son), his stockyard is under construction at Les Salines, for the other breeder (Mr. Alas), his stockyard is not built because he disagrees with the method of construction of the stockyard in question, according to him unsuitable for his animals.

Relocation of livestock parks

The location of the breeding pens in the Salines area was chosen without consulting them. For them, it is not the ideal place but it is finally one of the only ones available.

The problems mentioned differ according to the breeders:

- For Mr. Vaulmally, the proposed park is far too small for his current livestock, he will have to reduce his livestock, even modify it by stopping the breeding of sheep which, according to him, will not be able to survive because the allocated place is not adapted for sheep. Moreover, the shelter built for the animals, although it seems to him to be of good size, is made entirely of concrete, including the floor. This shelter does not seem viable to him because if he keeps his animals on a concrete floor, their dejecta will not degrade as they do now on natural soil. He also points out that he will not be able to clean up the droppings because he will need a lot of water, which is not available at this location. He fears that his animals will be more exposed to diseases.

The location of the Salines does not allow to offer enough fodder in situ, it will have to go far to get fodder.

Faced with this situation, Mr. Vaulmally plans to reduce his livestock but also to diversify his activities on the place initially planned for the breeding only. According to him, this is his only means of subsistence to ensure the future of his children.

- For Mr. Alas, he does not agree at all with going to the Salines site. According to him, it will be impossible for him to practice livestock farming there because there is simply not enough space to allow the animals to graze. According to him, the structures for housing the animals that have already been built in the other enclosures of the Salines are not at all adapted for the good health of the animals. He does not agree to park his animals in such structures.

Faced with this situation, Mr. Alas agrees to restrict his livestock in an enclosure but wishes to have access to an area closer to his locality (Cascade Jean-Louis). He also asks to build his own shelter for his animals. He is not asking for money to do this, just the supply of materials to do the work. This, according to him, would also limit the costs of a project manager.

Restoration of livelihoods

The breeders are currently pursuing their breeding activities in the Bangélique area because it is the only viable place for their extensive breeding.

As far as Mr. Vaulmally is concerned, he is satisfied with the enclosure that is allocated to him at the Salines as long as he can carry out the activities that he wishes.

As for Mr. Alas, having not accepted the proposed contract of relocation to Les Salines, he hopes to access a piece of land on Cascade Jean-Louis allowing him to continue his activity, as he does not wish to change. It is for him the only way to keep his livelihood.

Follow-up

There has been no follow-up to date, nor even any consultation by the project owner with Mr. Vaulmally regarding the construction of the enclosure and shelter structure in the Salines area.

Date	22/03/2023, 13h15
Places	In Coco
Contact person(s)	Focus group "fishermen's wives of Dans Coco

Communication

The women of Dans Coco heard about the project through government announcements on the radio. However, there has been no communication on the ground and they are not satisfied with the commitment of the stakeholders. They want more explanation to be reassured or informed about the risks and fears they have regarding the project, even if these, they believe, are unfounded. They wish to express themselves on the fisheries and the economic activities impacted. On the whole, they were not able to express their grievances and fears.



They were able to attend the January 2020 ESIA feedback meeting, but it was too crowded to have the opportunity to speak. In the end, it was people who were rather influential or who knew the authorities/ARLs who had the opportunity to speak.

They believe that communication engagement should be done through village committees first, as this format allows for interaction.

Fears and expectations

They fear that the noise and vibrations will affect the peace and quiet of the village, their homes and their children's schooling (school located nearby). They would like the flights to land and take off at times that will not interfere with their lives. Some people also fear collisions with buildings. That is why they want better communication, so that they can be reassured.

Relocation of fisheries

They are not satisfied with the proposed location of the fishery in Camp Pintade.

According to them, with regard to fishing generally, the solution proposed by the commission to land the fish in the vicinity (Dans Coco) is not viable because it implies long trips to return to the pier of Camp Pintade and the chief fisherman cannot supervise the distribution of the fish.

The processing and sale of fish and octopus is their only economic activity. For them, who buy the fish to dry and resell it, this implies additional expenses because it is necessary to travel to Camp Pintade.

They feel that these solutions are simply proposed by the authorities without taking into account the reality on the ground.

They also claim that if fishermen agree to keep a fisherman's helper status, they will not receive any assistance when they have to stop their activity in the near future.

The proposal to fish outside the lagoon could be interesting but they do not have the capacity (large enough boat), nor the knowledge to do that.

If the fishing activities of their husbands are impacted, they want work to be given to young people as a priority, as well as training. "We do not want a gift but a solution.

According to them, if the fishermen cannot continue, then they want to start a business (alone, not in a women's group) in the field of agri-food, handicrafts, sale of tourist products. They have a preference for agriculture and in this case, having support to develop a modern and irrigated agriculture would be interesting. They believe that there are few barriers due to their status as women. The main obstacle is financing and the purchase of equipment.

Date	22/03/2023, 14h15
Places	Cascade Jean-Louis
Contact person(s)	Tony Louis (member of the village committee) and Cascade villager Jean-Louis

Communication

Limited communication about the Project. There has been little information disseminated and engagement, other than the ESIA feedback meeting in January 2020. The rest of the information has come from word of mouth, which leads to confusion between knowing what is true and what is not.

They know that the village of Sainte Marie has been displaced, and that livestock breeding remains a problem for the displaced families.

Concerning the communication modalities, they would like the information to circulate through the village committees, because in the end they are not sure of the information that circulates.

The village committee is a structured body of 11 members: a President, a Vice President, a Secretary, a Vice Secretary, a Treasurer, and representatives of the themes of the economic and social life of the village (health, environment, agriculture, breeding, family, sport...). The committee meets once a month or more if necessary. The committee is responsible for the administration of the village. In the event of a problem, the committee tries to manage the conflict to reach a resolution, and if the situation is too complicated, it reports to the authorities concerned. But according to them, when the administration manages conflicts, it can take a long time because the files get lost. But in general, when there is a conflict, most of the time the stakeholders go directly to the police or the commissions, but rarely come to consult the village committees beforehand.

Fears and expectations

The feeling expressed during the consultation is:

- Lack of transparency and honesty in communication;
- Too much slowness in the implementation of livelihood restoration projects, especially in the construction of enclosures;
- Too much top-down and not enough bottom-up approach to defining activities.

The expectations expressed concern:

- Youth Employment;
- Development of tourism.

Restoring livelihoods

Some of the affected breeders complained about the size of their pen, which can only hold 13 to 14 head when they have about 100 during the breeding season. They asked to be moved to La Boucherie but were refused. Under these conditions, they refused to sign the contract for the relocation to Les Salines.

All of this discourages them. They want a helping hand in the transition and to be consulted in the hope of finding solutions. This may include support for feeding livestock. They want third parties to be involved in the MSR and not just the government to manage.

Follow-up

They want more follow-up and listening.

Date	24/03/2023, 17h15
Places	Quitor Cove
Contact person(s)	Mr. Legoff, former fisherman

Communication

Limited communication about the Project. There has been little information disseminated and engagement.

Restoration of livelihoods

Mr. Legoff states that the package offered by the RRA is correct, but he considers that the amount of compensation given for turning in the permit was ultimately not enough to live on in view of the rising prices. He also adds that the agricultural land that was also provided to him is satisfactory.

However, the implementation of fishing outside the lagoon is difficult: even if he has received the permit, the means are not yet there because the boats planned for this type of fishing are still under construction. Thus, he continues to fish illegally in the lagoon "like practically all the fishermen in the lagoon". He also states that he feels that there is too much pressure on the resources, "there are too many people in the lagoon", because the catches are less important. He also states that it is necessary for him to continue fishing in order to have sufficient income.

Follow-up

He wants more follow-up and listening.

Date	24/03/2023, 18h00.
Places	Marshal
Contact person(s)	Ms. Capdor Cindy, farmer; Mr. Capdor Gilblase, fisherman.

Communication

Limited communication about the Project. There has been little information disseminated and engagement.

Restoring livelihoods

Ms. Cindy Capdor had been farming on a piece of land in the Bangélique area that she had to abandon. She was able to receive a replacement plot to farm: this new plot is not as large as the previous one, but it is located closer to her home and is better landscaped according to her. In addition, Ms. Capdor is pleased with the new area (in Marechal) because it gets better rainfall. The fact that this new plot is close to her home saves her time and energy.

Mr. Gilblase Capdor fishes with his brother, Bruno Capdor, head of the fishery now relocated to Les Salines. He is facing the same difficulties as his brother (new fisheries not adapted, very difficult and dangerous road access in rainy season and no electricity installed...). He thinks that the Airport Project is inevitable and he underlines that if, according to him, the Project is beneficial for Rodrigues "they should not be harmed in their human rights".

Follow-up

They want more follow-up and listening.

Date	20/03/2023 - 10h00
Places	Port Mathurin

<p>Contact person(s)</p>	<p>Carlo Botsar - Departmental Head of the Civil Aviation Commission</p>
<p>Brief presentation of the experts and the mission</p> <p>The Civil Aviation Commission, which reports to the Central Administration (Chief Commissioner), is the Commission in charge of steering the RAP. They collaborate with the relevant commissions (agriculture, livestock, cadastre) when necessary. They worked closely with the EPMU because they were in the same building under the previous government, which is no longer the case today.</p> <p>Communication/stakeholder engagement</p> <p>Since the Civil Aviation Commission is in charge of the Project, this commission centralizes the activities and the communication. All files related to the management of the project are kept there.</p> <p>According to him, one of the difficulties in managing communication is related to the small size of the island and therefore the proximity between the government (the commissioners and members of the commissions) and the population. Complaints are often made orally during unannounced visits or on the street, which makes it difficult to manage the follow-up of requests.</p> <p>The PAPs often go to the EPMU, which passes the message on to the Civil Aviation Commission. It is the EPMU that has the minutes of the consultations made with the Ste Marie.</p> <p>Physical relocation</p> <p>According to Mr. Carlo Botsar, resettlement activities (including livelihood restoration) are 71% complete. He acknowledged that roads are missing and that this will be done by the end of the year.</p> <p>The RRA has contracted a consultant/engineer to design and build the structures.</p> <p>Regarding the two households (Sévéry family) to be relocated, the consultant is working on the terms of reference which will be ready by April. They expect the new houses to be ready by the end of December 2023.</p> <p>Regarding compensation, there were two requests to receive monetary compensation and not in kind (getting the full amount dedicated to the contract), but this was denied.</p> <p>The preparation of the leases is finalized, but this is managed by the land registry office.</p> <p>Mr. Botsar confirms that there has been no eviction.</p> <p>Restoring livelihoods</p> <p>Concerning the non-payment of compensation for the trees and fruit plants left in Sainte Marie, he states that he is not aware of the progress of the files and concerning the compensation for uprooting, he is not aware that this promise has been made.</p> <p>As for the agricultural activity, the work has been delayed because the uprooting of invasive <i>Acacia nilotica</i> (pikan-loulou) on the sites selected for the location of the plots is more difficult than expected.</p> <p>Concerning the non-arrangement of the breeding plots according to their previous configuration (simultaneous breeding of pigs, goats, poultry...): this was done for sanitary reasons. But this was not explained to the PAPs.</p> <p>Communication/stakeholder engagement</p> <p>Since the Civil Aviation Commission is in charge of the project, it is the focal point for activities and communication. But according to Mr. Botsar, ARL is intended to take the lead on engagement.</p>	

Relevant communication channels, in his opinion, are television (especially at press conferences) and Facebook. In addition, PAPs often go to the EPMU, which escalates the message to the Civil Aviation Commission. But he also says he has not received any complaints.

In addition, he adds that the commissions have opened a permanent office on Wednesday afternoons, during which the citizens can come and submit their problems.

He had considered setting up a hotline, but his experience with the one set up to report water shortages showed that citizens do not use this means of expressing a complaint.

Finally, Mr. Botsar says he plans to conduct formal meetings with PAPs starting in April 2023.

Follow-up

The RRA conducts a report of audits, which are published on the National Audit Office website.

Actions for water

Water availability is a recurrent problem in Rodrigues. The RRA is well aware of this and has adopted several actions at this level. The current production is 6000 m3 per day, while the daily demand reaches 12000 m3. The current supply is ensured by a surface water collection station (capacity of 4400 m3 per day), a desalination plant at Caverne Bouteille (capacity of 100 m3 per day at present but normally of 500 m3), one at Songe (500 m3 per day), Pointe Coton (500 m3 per day) and Pointe Venus (500 m3 per day) The RRA has created the Rodrigues Public Utilities Corporation (RPUC) which is a public company in charge of implementing public infrastructure investment projects in Rodrigues. The RPUC will receive a loan from the Mauritius Investment Corporation in the amount of MRU 1 billion, 50% of which will be allocated to water management projects:

- 1) Desalination projects are planned to increase this capacity. The RPUC is to set up a desalination plant with a capacity of 3500 m3 per day at Caverne Bouteille.
- 2) Projects for the rehabilitation of existing infrastructure capacities are envisaged, particularly for hillside reservoirs and dams.

If hotel constructions are envisaged on Rodrigues, the hotel unit is obliged to set up its own desalination unit to meet its water needs.

Date	21/03/2023 - 10h15
Places	Committee on Agriculture, Animal Husbandry and Fisheries - Citronella
Contact person(s)	Mr. Jean Paul Colin (Departmental Head) and officers in charge of agriculture, fisheries and livestock

Brief presentation of the experts and the mission

The Commission's competencies are in the areas of agriculture, livestock and fisheries. The Commission has been directly involved in the implementation of the RAP. On the other hand, the Commission has jurisdiction over issues related to the indirect impacts of the Airport Expansion Project.

It was noted that commission members reported a lack of communication between the chief commissioner's office and the agriculture/fisheries/livestock department on the project.

Restoring livelihoods

Agriculture

The Commission states that the only site available near Sainte Marie for farming is the La Boucherie site and that the site was identified by consensus with the people of Sainte Marie. However, the Commission is not in charge of the rehabilitation of the site (notably the removal of the invasive species *Acacia nilotica* or "pikan loulou"). They made a proposal for a total rehabilitation, but in the end it will be a partial rehabilitation due to the difficulties encountered to remove the trees. The development operations will include: the uprooting of trees, the preparation of the site's soil, drainage, irrigation and the installation of fences.

Work has been delayed, with operations partially commencing in late February 2023 with a JCB type excavator. Normally, operations would begin in full during the week of March 27, 2023 with heavier Caterpillar D6 equipment. The Commission states that the ordered workload has been estimated at 80 days and the land should be ready by the end of July.

Agricultural permits will be granted as soon as the plots are ready.

Operations will have to move quickly, as one of the concerns expressed by the Commission is that plots should not be left uncropped as regeneration of 'pikan loulou' can be rapid. Farmers will have to regularly pull up the regrowth in their plots. A proactive and dynamic communication will be necessary.

Concerning the inventories and the payment of compensations, it is the Chief Commissioner's office that is responsible for estimating the compensations to be paid and validating the amounts.

The Agriculture and Livestock Commission is not involved in communication with PAPs.

Breeding

In the initial proposal, the commission selected two sites to produce the fodder necessary for livestock near the salt mines. One for the production of "leaf fodder", the other for the production of fodder of more carbonaceous materials. However, this proposal was not approved.

Concerning the realization of enclosures that are not adapted to the practice of breeding multiple animals, such as the one carried out by the inhabitants of Sainte Marie, the reason evoked is related to the biosecurity of the farms because there will be sanitary standards to respect. Multiple breeding creates risks of epidemics and makes it difficult to control diseases. The commission wishes to instill a change in practices in Rodrigues at this level, but this is a practice strongly anchored in the local culture so it takes time. This has not been communicated to the PAPs. They want to raise awareness and communicate on this subject in order to improve biosecurity. Therefore, they do not recommend to continue this method of farming and have not built pens that allow this method. However, PAPs are free to do as they wish and can design their pens as they wish. However, poultry farming is not recommended in Plaine Corail, again for biosecurity reasons.

Fishing

The regularization of fishing permits is not an option because there is already too much pressure on the resources in the lagoon. This is a point that is difficult to negotiate in the demands of the PAPs. The Fishing Conference that took place recently validated in its report the need to drastically reduce fishing in the lagoon. The objective is to orientate fishing outside the lagoon: with a current production of 450 tons per year, the objective is to reach 1000 tons by 2024.

Regarding Mr. Ithier's fishery: its location has not been validated by the land registry because it is located in the immediate vicinity of the SEMPA marine reserve. To remedy the inconvenience, the Commission thinks that it would be possible to land the fish at Dans Coco and to park the boats at Camp Pintade (where the fishery has been allocated). This may be a matter of habit, but they recognize that it has a cost and that Camp Pintade is not well served by transportation.

The Commission confirms that Mr. Ithier did not receive the proposed financial assistance after surrendering his licence because he did not formally accept the proposals made.

Indirect impacts

Agriculture

Again, the Commission members are not sure that the island can sustain the needs resulting from the influx of tourists. Moreover, the tourist season takes place during the driest periods (November - January). During these seasons, Rodrigues already resorts to importing food and this leads to an increase in prices.

The discussed plans to increase the cultivated area on the island to 1500 ha are, according to them, farfetched. 900 or 1000 ha are more feasible.

Breeding

They estimate that in terms of production, Rodrigues has almost reached its maximum production capacity because grazing areas are decreasing in favor of construction areas (residences). They have a project to rehabilitate 13 fodder sites.

Concerning the capacity to meet the island's demand for meat: the commission does not see the point of seeking to improve production. Indeed, a project of crossbreeding of bovine breed does not seem relevant according to them because the island could not meet the needs of more productive animals. In addition, they want to maintain the quality of production. Finally, trying to increase yields (using imported feed, improved breeds) would increase costs and the inhabitants would suffer. It would be sufficient to simply decrease the quantities exported to Mauritius to meet the needs of Rodrigues.

Fishing

Fishing outside the lagoon is an activity to be developed for the Commission because it will reduce the pressure on the lagoon and the loss of biodiversity.

Currently, it is a poorly structured sector. The boats are not necessarily suitable. Despite the will to invest in adapted equipment, this has not yet been achieved. Fishing in the lagoon is characterized as multi-species, i.e., there is a large variety of species but the volume is limited, unlike fishing in the ocean (outside the lagoon) where the species are less varied but in large quantities.

Currently, fishing outside the lagoon brings in 450 tons per year, and the Commission is aiming for 1,000 tons in 2024 and 3,000 in 2025. Overfishing by foreign vessels is not too much of a problem in Rodrigues, although they want to remain vigilant on this issue.

Additional information on non-lagoon fishing plans is available in the SIDPR.

Date	24/03/2023 - 10h30
Places	Cadatre Office - Port Mathurin
Contact person(s)	Mr. Raboude, Land registrar
Quick presentation of the experts and the mission.	

The objective of the meeting is essentially to understand the situation of the resettled people with regard to the land registry.

The original plan was for PAPs to receive the lease at move-in and pay annual rent. However, this has been delayed for a variety of reasons:

- The covid crisis;
- PAPs that have "gone beyond" the original scope of the project.

At this point, PAPs have not paid rent, only a few have done so, even in the absence of a lease because they have signed a letter of intent.

The leases are now finalized and have been updated (when the PAPs overflowed), only the final signature of the Central Administration is missing. Note that one point remains to be validated: the retroactive payment or not of rents since the relocation. Presumably, the PAPs will not have to pay the few years of rent and those who have paid will be exempted for some time for the sake of equality. This will be considered transitional assistance.

Concerning the formalization of leases for PAP children, if only one child has obtained formalization, it is because he made the request earlier, the others will have to "wait their turn". The criteria for obtaining a lease in his name are :

- be of age,
- be a perpetual resident in Rodrigues,
- and make an application.

Regarding the estates of deceased PAPs: one child lived with a deceased and had the lease in her name. In the other case, the heirs have not yet named the primary beneficiary.

Finally, the interlocutor requested the support of the World Bank to improve the means (equipment) and knowledge (training) of the department in terms of inventory and topographic survey.



Annex 2: Attendance list of consultations and interviews carried out for this audit

See pdf fil attached.