

**KIRIBATI: OUTER ISLANDS TRANSPORT INFRASTRUCTURE
IMPROVEMENT PROJECT**

World Bank and Asian Development Bank

Environmental and Social Management Framework

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List of Abbreviations

ADB	Asian Development Bank
BEIA	Basic Environmental Impact Assessment
CBD	Convention on Biological Diversity
CPPL	Central Pacific Producers Limited
DMP	Dredging Management Plan
EA	Environmental Assessment
ECD	Environment and Conservation Division
ECOP	Environmental Codes of Practice
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESSIP	Environmental and Social Safeguard Instruments for Pacific Island Countries
FAO	Food and Agriculture Organization of the United Nations
FFA	Pacific Islands Forum Fisheries Agency
GDP	Gross Domestic Product
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
GOK	Government of Kiribati
IDA	International Development Association
IPF	Investment Project Financing
KDP	Kiribati Development Plan 2016-2019
KFSU	Kiribati Fiduciary Services Unit
KV20	Kiribati Vision 2020
MELAD	Ministry of Environment, Lands and Agricultural Development
MFED	Ministry of Finance and Economic Development
MISE	Ministry of infrastructure and Sustainable Energy
MICT	Ministry of Information, Communication, and Transport
	MCS Monitoring, Control and Surveillance
MPA	Marine Protected Area
NBSAP	National Biodiversity Strategies and Action Plan
OIIU	Outer Islands Implementation Unit
OP	Operational Policy (of the World Bank)
PCCSP	Pacific Climate Change Science Program
PDO	Project Development Objective
RP	Resettlement Plan
RPF	Resettlement Policy Framework
SEP	Stakeholder Engagement Plan
SPS	Safeguard Policy Statement (ADB 2009)
TA	Technical Assistance/Advisory
TOR	Terms of Reference
WB	World Bank

1 Introduction

The Government of Kiribati (GOK) is seeking funding from the World Bank and Asia Development Bank for the Kiribati Outer Islands Transport Improvement Program (KOITIIP World Bank P165838) to improve transport connectivity for communities in selected outer islands (OI) of Kiribati through provision of sustainable, safe and resilient universal basic access transport infrastructure.

The KOITIIP project's Project Development Objective (PDO) is to improve the safe and resilient transport connectivity of selected outer islands in the Gilbert Islands Chain of Kiribati, and in the event of an eligible crisis or emergency, to provide an immediate response to the eligible crisis or emergency. facilitated by providing financing to facilitate hydrological surveys, aids to navigation, the repair and improvement of causeways crossing lagoons and marine access, institutional strengthening and operational support. KOITIIP is focused on four islands of Abaiang, Beru, Nonouti and Tab South.

The Project reflects key elements of the Government's Kiribati Vision 2020 and will contribute to implementation of the Kiribati Development Plan 2016-19 (KDP) by supporting inter-island connectivity by enhancing safety of the inter-island transport system reliant on sea services, improving intra-island transport causeways, installing/rehabilitation jetties and boat ramps and improving access to social services, and promoting training opportunities for professional and technical staff in relevant ministries, building human resource capacity.

The project is proposed to be financed through a mixture of funds from International Development Association (IDA) grant and ADB fund resources: USD 30 million IDA and USD 12 million ADB.

2 Purpose and Scope of the ESMF

This Environmental and Social Management Framework (ESMF) sets out the principles, policies and procedures for environmental and social protection that the GOK will employ in the context of the KOITIIP. The rationale of using an ESMF is that specific activities for all projects/phases of the project were not identified during the project preparation and will to some extent be determined during detailed design after the completion of further detailed studies in years 1 and 2, therefore, not all of the environmental and social impacts are known.

The purpose of this ESMF is to provide the process and procedures for screening, assessment, review and monitoring of subprojects and components in a manner that complies with the safeguard requirements of World Bank and ADB and the environmental laws of Kiribati.

In addition to the Resettlement Framework, a standalone Land Acquisition and Resettlement Plan (LARP) has been drafted to document the status of land ownership in the proposed sites, to identify potential involuntary resettlement impacts, and to plan appropriate measures to mitigate any potential negative impacts in accordance with ADB requirements. The LARP documents the consultations held with key stakeholders, their concerns and recommendations as well as measures to address those concerns during project implementation, based on the ADB Social Policy Statement (2009) and the legislation of Kiribati. The initial LARP will require updating once the scope of design is finalized and the status of all concerned land is known.

A Stakeholder Engagement Plan has been prepared to define a technically and culturally appropriate approach to consultation and disclosure; to improve and facilitate decision making and create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner so that these groups are provided sufficient opportunity to voice their opinions and concerns that may influence Project decisions. The SEP will guide consultation between the implementing agencies (IAs); Ministry of Information, Communication, Transport & Tourism Development (MICT) and Ministry of Infrastructure and Sustainable Energy (MISE) and its stakeholders.

The ESMF outlines the project, its components, the environmental and social context, possible environmental and social impacts, and their management. It provides an overview of the types of subproject activities to be assessed, the environmental and social screening process, and the subproject-specific safeguard instruments that will be prepared once the project locations and designs and other details are known. Monitoring and reporting are also addressed to ensure ongoing adherence to environmental and social safeguards. Annexes are included to support the analysis. The KFSU supported by MISE and MICT will have the overall responsibility for ensuring that environmental and social issues are adequately addressed within the project cycle.

The ESMF meets the requirements of the relevant World Bank Operational Policies and laws of Kiribati to describe the procedural responses to identifying and managing impacts throughout the project. The World Bank safeguard policies are available at www.worldbank.org/safeguards. The ESMF will be accepted by ADB in place of the Environmental Assessment and Review Framework (EARF) as a prerequisite according to Asian Development Bank Safeguards Policy Statement (SPS 2009) in order to meet the requirements of the ADB.

3 Description of the Project Components and Typology of Sub-Projects

The **Project Development Objective** (PDO) The proposed PDO is to improve the safe and resilient transport connectivity of selected outer islands in the Gilbert Islands Chain of Kiribati, and in the event of an eligible crisis or emergency, to provide an immediate response to the eligible crisis or emergency. The Project is designed as a seven year, USD 52 million Investment with project financing from World Bank and ADB, organized into four components.

3.1 Project Subcomponents and Typologies

The following project components and activities are being considered as part of the KOITIIP. They will be refined and decided during project preparation and will be subject to available financing.

The proposed project components and sub-components are:

Component 1: Safe Inter-Island Navigation. This component will finance hydrographic surveying (by Airborne Laser Bathymetry (ALB) and vessel-based Multi-Beam Echo Sounder (MBES) surveys) and maritime charts focusing on the four target islands to significantly improve the safety of navigation.¹ In addition to hydrographic surveying services, the component will finance contractor management services, as well as seabed mounted tide gauges and current meters in certain locations in each target outer island. The component is especially important as it is a precursor to, and will directly inform, the design of the maritime works in Sub-Components 2.1 and 2.2.

In addition to digital chart production, and accessible bathymetric data that can be used across Government, the component will improve the hydrographic institutional capacity. To increase transfer of knowledge, the activities will also aim at exposing MICT staff to experiences during the delivery of all outputs that will increase hydrographic capacity and long-term self-sufficiency. Notwithstanding the safety benefits to maritime transport, the hydrographic surveying will lead to more climate resilient spatial planning by having a detailed baseline from which to monitor the impacts of climate change on lagoon marine resources, reefs and coastline².

Component 2: Resilient Outer Island Access Infrastructure.³ Activities to be financed under this component include: (a) technical engineering studies, including climate resilience measures, and preparation of bidding documents for project related activities; (b) preparation of environmental and social safeguards instruments; (c) execution of civil works; (d) supervision of civil works; (e) maintenance of project assets; (f) third-party technical audits; and (g) third-party environmental, social, and security audits of the civil works. Activities will include on-the-job training of unskilled labor living in the project area in charge of carrying out project rehabilitation works and GoK routine maintenance.

¹ Depending on cost, the surveying effort may be extended to cover other outer islands.

² During project preparation ADB has carried out a *Climate Risk and Vulnerability Assessment* for the outer islands considered under the KOITIIP, which includes modelling to predict the specific changes to temperature, rainfall, wind and wave climate, coastal processes and oceanic conditions.

³ Should funds permit further investment after the prioritization of the four islands already indicated by GoK, additional islands could be added to KOITIIP.

- a. *Sub-Component 2.1 Improvement of Ships Safety Navigation.* This sub-component will provide assistance to design⁴, to replace existing defective AtoNs, to fabricate and install new AtoNs, as well as to establish a system of maintaining these assets. Activities will involve as much local participation as possible, with a specific goal of transferring skills needed to sustain the Marine Division's AtoNs asset management function into the future. The locations of the new AtoNs will be informed by the hydrographic and charting outputs (Component 1).
- b. *Sub-Component 2.2 Rehabilitation of Island Access Infrastructure.* Following completion of the hydrographic surveys, this sub-component will finance engineering studies and civil works for a variety of maritime infrastructure improvements, tailored to the needs of each island, as follows: (a) construction of jetty, passenger terminal and concrete ramp on Abaiang; and small-scale dredging, passenger terminal, and seawall upgrade works on Beru; (b) construction of small multipurpose maritime facilities on Nonouti and Tabiteuea South, including concrete boat ramp, shelter, and AtoN workshop and small equipment; and (c) accompanying consulting services to support delivery of Sub-Component 2.2.(b).

Sub-Component 2.3 Rehabilitation of Lagoon Crossings. The causeways on the outer islands vary from generally good condition requiring only localized maintenance, to poor condition requiring extensive rehabilitation or reconstruction over a significant portion of the causeway. Sub-Component 2.3 will finance: (a) rehabilitation works for causeways, including enabling works and related investments, to ensure accessibility on prioritized outer islands. The rehabilitation works will include upgrading the causeway surfaces and incorporating climate resilient features such as proper drainage and erosion control. Side walls will also be repaired or reinforced, and the causeway base is also expected to be widened to further strengthen the overall structure. Existing culverts will be maintained, while new culverts will be installed where necessary to improve water flow between the lagoon and ocean sides. Maintenance of the causeways will be secured during the project period, promoting the participation of women on the maintenance teams; and (b) accompanying consulting services⁵ to support detailed design and delivery of this sub-component, as well as additional site investigations and studies (e.g. geomorphological studies).

Component 3: Strengthening the Enabling Environment. This component will strengthen MICT and MISE's institutional and regulatory functions for transport sector asset management, systematically increasing the sustainability of the climate resilient transport sector investments. The component will also provide project management and operational support to KOITIIP and KFSU.

- a. *Sub-Component 3.1 Institutional Strengthening.* This subcomponent will provide technical assistance to support the capacity development for the two implementing agencies MICT and MISE. Proposed technical assistance activities for the Marine Division of the MICT will include training, consultancy assistance for a marine spatial database development, as well as assessments and studies. The institutional strengthening for MISE throughout KOITIIP is expected to have long-lasting positive impacts on the overall road management. Mentored by experienced international professionals, over the course of the project MISE staff will take on

⁴ The AtoNs will be designed to meet the International Association of Lighthouse Authorities (IALA) guidelines. Additional considerations will include illumination for safe night passage, climate resilience and energy efficiency.

⁵ This consulting firm, financed through Sub-Components 2.2.c and 2.3.b, will mentor MISE staff throughout all project

phases (design, construction, maintenance). The consulting firm will also conduct formal quality assurance audits of all designs financed under Component 2.

increasing responsibility. Proposed technical assistance activities will include a MISE capacity investment plan, associated training, program licenses and software.⁶

- b. *Sub-Component 3.2: Operational Support for the Outer Islands Implementation Unit (OIIU)*. This subcomponent will finance project management and operational costs - human resources or goods - associated with implementation of the proposed project. Activities to be financed will include: (a) operating costs of the OIIU, including salary of key OIIU staff and consultants, as well as support to the implementing agencies for the overall technical supervision of the project; (b) relevant training for project staff; (c) acquisition of small equipment; (d) financial audits; (e) monitoring and evaluation; and (e) IDA compliance monitoring of environmental and social safeguards, including training and capacity building to assist the Environmental and Conservation Division (ECD) to monitor safeguards implementation and compliance with national environmental legislation. Beneficiaries' participation and feedback during project preparation and implementation will be facilitated through citizen engagement processes. Moreover, the OIIU will include: (i) an international Chief Technical Advisor for the OIIU, with experience in project management as well as civil works to ensure that the project has the correct technical as well as managerial guidance; (ii) a national Project Manager, considering the project will focus on the remote outer islands, as well as potential language and cultural barriers; and, (iii) community consultation staff as it will be important to engage with the communities early on in the project and continuously during implementation of works.
- c. *Sub-Component 3.3: Operational Support for the Kiribati Fiduciary Services Unit (KFSU)*. This subcomponent will strengthen the capacity of the existing KFSU, to provide support across all donor funded projects. It will finance project management and operational costs - human resources or goods - associated with implementation of the proposed project. Activities to be financed will include: (a) operating costs of KFSU, including salary of key KFSU staff and consultants; (b) relevant training for project staff; (c) acquisition of small equipment; (d) financial audits; (e) monitoring and evaluation. In addition to the fiduciary responsibilities, the KFSU will be staffed with international experts (e.g. Procurement, Safeguards and Financial Management Specialists) who will provide advice, as well as capacity building and guidance for the different project implementation units and government Ministries implementing all donor- funded projects.

Component 4: Contingency Emergency Response (US\$0 million equivalent). Following an eligible crisis or emergency, the Recipient may request the Association to re-allocate project funds to support emergency response and reconstruction. This component would draw from the uncommitted resources under the project from other project components to cover emergency response. A CERC Project Operations Manual, acceptable to the Association, for the implementation of the Contingency Emergency Response Plan, will be prepared and constitute a disbursement condition for this component.

A CERC project operational manual (POM) will be developed including safeguards risks, impacts and mitigation measures should the component be required.

⁶ Examples of such technical assistance include: structural design software; road design software; licenses of relevant

international standards; wide range of office-based and onsite training in project management, procurement, cost estimation etc.

3.2 Types of Subproject Activities

The types of subcomponent activities which will be assessed and screened for their environmental and social risks are summarized in the descriptions above. Further details of the typologies and concepts for the subcomponents are presented in Annex 1.

4 Environmental and Social Baseline Conditions

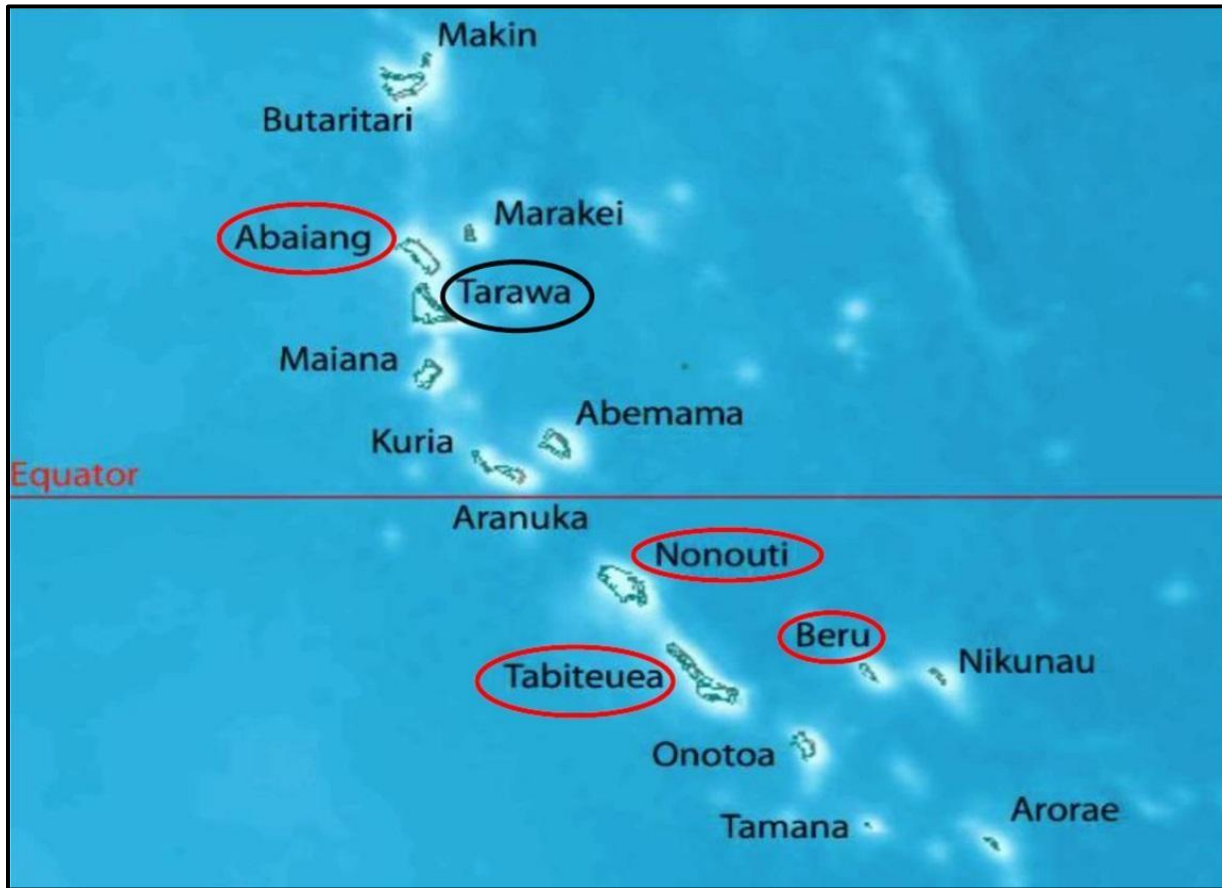
4.1 Environmental conditions common to Outer Islands

4.1.1 Coastal and Marine Ecosystems

Kiribati is an of nation stretching over an ocean area of more than 3.5 million km² across the central Pacific Ocean encompassing some of the world’s most diverse and productive ecosystems. All the islands are of coralline origin and are surrounded by fringing or barrier coral reefs. The country is divided into three widely separated island groups - the Gilbert Group in the west, the Phoenix Group in the centre, and the Line Islands in the east.

The KOITIIP outer islands (subject of this ESMF) are in the Gilbert Group; namely Abaiang, Beru, Nonouti and Tabiteuea South as shown in Figure 4.1. All KOITIIP islands have large shallow lagoons and complex inner lagoon systems that provide habitat for flora and fauna and food for the islanders.

Figure 4.1 – Outer Islands of the Gilbert Group selected for KOITIIP by GOK



4.1.2 Climate

Like all islands in Kiribati, Abaiang, Beru, Nonouti and Tabiteuea South are in the direct path of the easterly trade wind that shifts northward and southward at different times of the year. Between December to March Kiritimati islands experience the northern trade wind while the south-east trade wind comes in between June and September (PACCSAP 2014).

The average annual rainfall is extremely variable due to an El Niño-Southern Oscillation (ENSO) (ICCAI 2011). Higher than average rainfalls are experienced during El Niño events. These events are natural climate patterns that occur across the tropical Pacific Ocean and world weather. There are two extreme phases of ENSO: El Niño and La Niña. There is also a neutral phase. Across Kiribati, El Niño events tend to bring wetter, warmer conditions than normal. La Niña is characterized by dry periods that often result in severe droughts if these dry periods are prolonged especially in the southern islands of the Gilbert group including Nonouti, Tabiteuea South and Beru. Cyclones rarely hit Kiribati however storm surges are experienced frequently, often causing extensive flooding and strong winds.

4.1.3 Terrestrial Fauna and Flora

The atoll soil on all the subject islands is relatively poor and can only support a few plants. The most common include coconut (*Cocos nucifera*), pandanus (*Pandanus tectorius*), breadfruit (*Artocarpus sp.*), bwabwai/giant swamp taro (*Cyrtosperma chamisson*). Other trees include te burukam (*Casuarina eauisetifolia*), te buka (*Pisonia grandis*), te ren (*Tournefortia argentea*), te uri (*Guettarda speciosa*), and te non (*Morinda citrifolia*) are used as food and to harvest fruits. The scrub species *Scaevola sericea* and *Scaevola tucada* (te mao) is very common through most islands based on observation.

Along the beach fronts the legume locally known as te ruku (*Ipomoea sp*) is quite common. Te ngea (*Pemphis acidula*) can also be found in patches at certain locations along the lagoon shore and is common near many of the KOITIIP project locations. Mangroves species found around the various islands, namely the white mangroves (*Sonneratio alba*), te tongo buangu (*Bruguiera gymnorhiza*), te aitoa (*Lumnitzera littorea*), and the red mangrove (*Rhizophora stylosa*). However only *Rhizophora stylosa* was seen near the conceptual KOITIIP project locations.

Other introduced and food crops include banana, pawpaw, pumpkins and few varieties of vegetables are cultivated on the island.

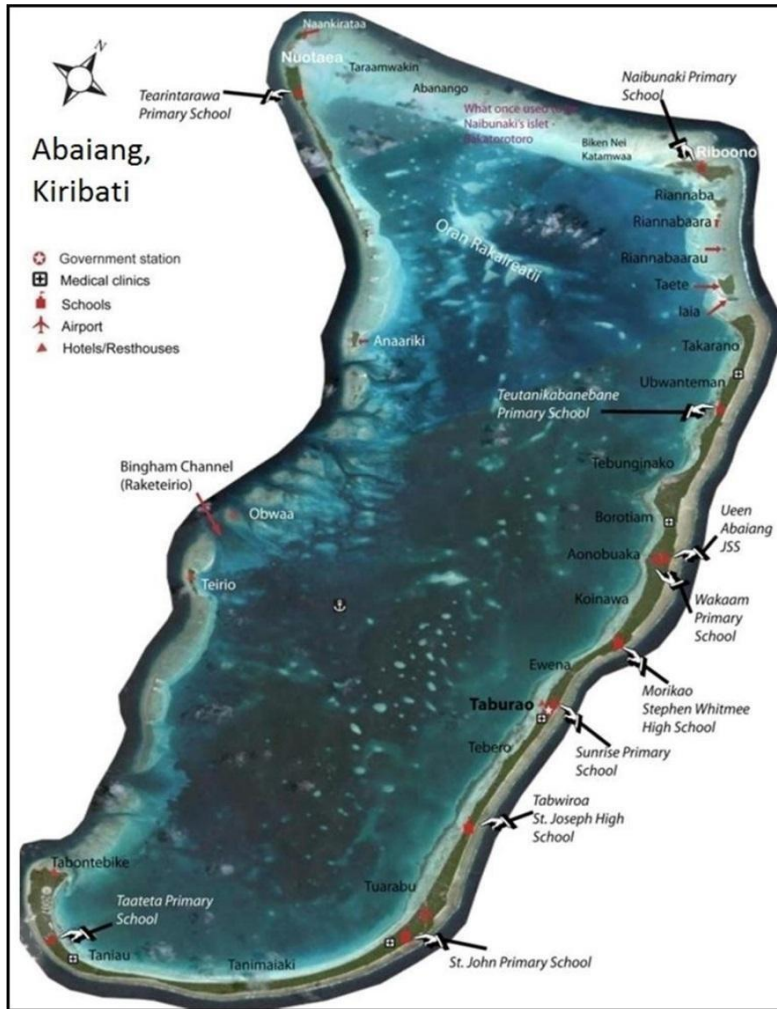
Native birds and insect species normally found on the islands are the common black noddy (*teio*), white noddy (*kiakia*), reef heron (*tekaai*) and frigate birds (*teeitei*). Noumatong one of the islets of Nonouti is a bird sanctuary, and is known to harbor black and white noddies, terns and frigate birds. In and nearby the villages, fauna mostly comprises introduced pigs, chickens, dogs, rats and cats.

Milk-fish (*Chanos chanos*) and bone fish (*Albula glossodonta*) are present in the waters around most islands supporting artisanal fishing. Off-shore territorial waters are rich in fish stocks such as tuna and bill fish.

4.2 Abaiang

Abaiang is the closest outer island to the capital at approximately 9.5 km from north coast of Tarawa at latitude 1° 51' 29.62" N, longitude 172° 56' 28.58" E). Abaiang lies within the equatorial waters that warm significantly during an El Niño event resulting in much higher rainfall than normal. During a La Niña event, the equatorial waters are cooler and there is much lower rainfall during that period. During El Niño years, maximum air temperatures tend to be higher than normal and are driven by the warmer oceans surrounding the islands. During the dry season, minimum air temperatures in El Niño years are below normal.

Figure 4.2. Map of Abaiang



Source: [en/Wikipedia.org/wiki/Abaiang_island](https://en.wikipedia.org/wiki/Abaiang_island))

A large lagoon of over 240 km² dominates Abaiang (Figure 4.2). The lagoon opens into the ocean through several passes in a barrier reef on the western side of the atoll. Abaiang's land area is about 17km² and the atoll is approximately 37km long but no more than 1km wide. Most of Abaiang's 18 villages are accessible by roads. Ribono and Nuotaea are located on separate islets in the north and can only be accessed by boat.

The smaller islets of the west are mostly used for fishing, collecting copra, and tourism and generally do not have permanent structures for housing. About 71% of Abaiang Island is covered by vegetation, mainly coconut palms; non-vegetated areas are either bare land or water bodies.

Coastal erosion is a serious problem on Abaiang. However, unlike some islands where erosion has been linked to construction of causeways, Abaiang has no causeways, yet coastal erosion has been the biggest physical problem for many years.

4.3 Beru

Beru is in the southern Gilbert group of islands (latitude 1° 19' S, longitude 175° 58' E) and has 7 villages (Figure 4.3). It has a total land area of 17.63 km², is 1.1km at its widest point in the village of Tabaiang and 0.16km wide at its narrowest at Weneete in the north. Beru is about 13.7km from end to end. There are two lakes on the island. 'Nein Tabuariki' is located at the southern end of the island in the village of Taboiaki and is where edible algae can be found. 'Te nei ni man' the second lake is located at the northern end of the island near the village of Autukia. During raining season the lake is often full of Milkfish (*Chanos chanos*). During times of drought, the lake turns salty.

People living outside urban centres or outer islands are subsistence farmers or fishermen).

Figure 4.3 - Beru



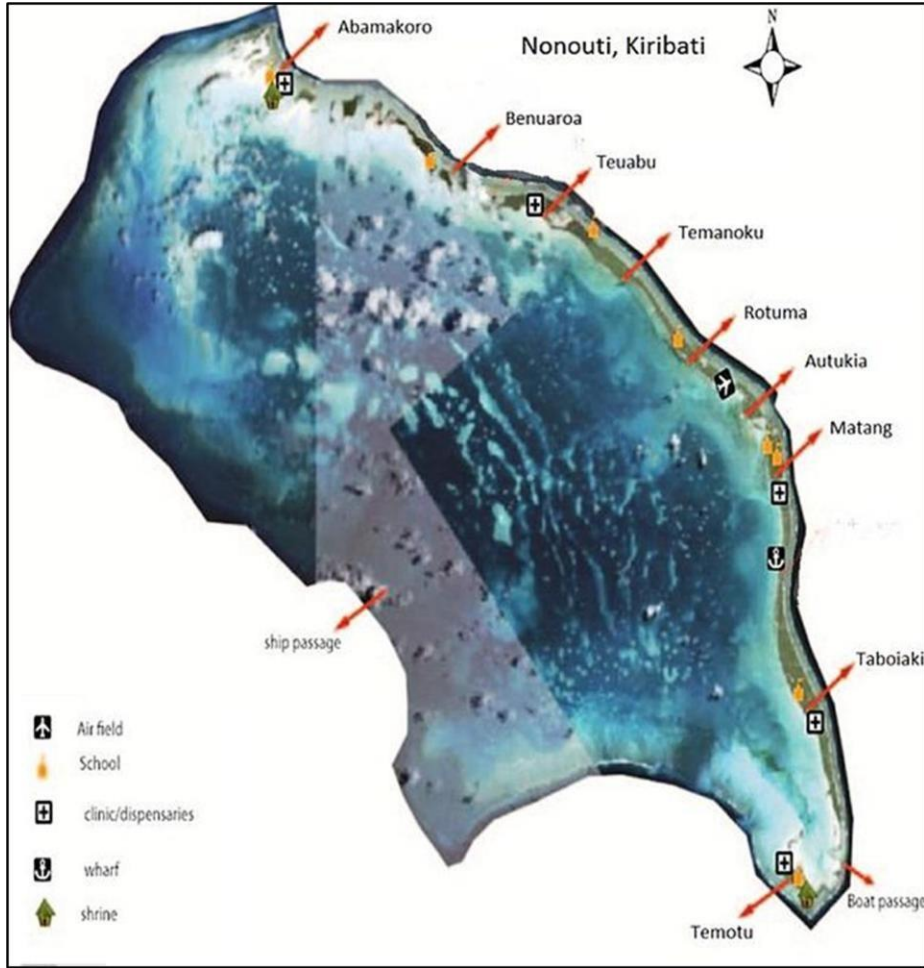
(source: en/Wikipedia.org/wiki/Beru_island)

Two enclosed lagoons can be found on Beru, at either end of the island. Kaariraia causeway at the north closes off the lagoon at the northern part of the island and joins Tabaiang with Weneete and Tebikeeriki. Inside the enclosed pond are algal blooms which includes brown and green algae and a dying mangrove ecosystem and pemphis acidula at the northeast end of the causeway. The intertidal mud flat on the other side is host to certain seashells and fish species such as silver-biddy and bluefin travelly during high tide,. Coastal erosion is evident on the coastlines leading to both ends of the causeway at south-west and northe-east. The predominant vegetation surrounding the causeway and at both ends include saltbush and coconut trees. Water still flows in and out of the enclosed lagoon through the porous causeway and the lagoon supports a variety of fish such as milk fish, barracuda, trevally and other finfish species. Similary, at the south, Nuka causeway closes off the lagoon at the southern part of the island and joins the villages of Nuka and Teteirio. The enclosed lagoon also support diverse marine resources but is mainly known for the milk fish. These resources are managed by the Beru Island Council. At both ends of the causeway, the vegetation includes salt tolerance shrubs mainly the Saltbush (*Scaevola sericea*), the Beach Morning Glory, pandanus, the bantigue (*Pemphis acidula*) locally known as Te Ngea and the coconut palms. Alongside the causeway are other grown bush shrubs, mangroves with a coverage of less than 10 m², and Te Ngea.

4.4 Nonouti

Nonouti lies south of the equator (latitude 0° 37' S, longitude 174° 22' E) and is also in the Southern Group of the Gilbert Islands (Figure 4.4). In terms of land area (19.85 km²) Nonouti is the third largest island in the Gilbert Group and the fifth largest in the country when counting Kiritimati (the largest) and Tabuaeran (2nd largest). It is 36.72km long, 0.92km at its widest, and 0.07km at its narrowest point.

Figure 4.4 - Nonouti



(Source: en/Wikipedia.org/wiki/Nonouti_island)

Causeways have been constructed to connect the islets of Teuabu, Tereiango, Tebuka, Buariki, Mataboou and Katabanga on the northern end of the island. The furthest northern village Abamakoro

which is several islets away from Katabanga is not connected by causeway and can only be accessed by boat. Located on the northwest side of the atoll is an islet called Noumatong. It is uninhabited and is local protected as a bird sanctuary. On the southern end of the island Temotu village is also connected by causeway to the main island.

Some of the five existing causeways on Nonouti shared a common site description and surroundings as follows:

- There are no mangroves and seagrasses found alongside the two causeways further north of the Island. The other two causeways located in the middle of the island have grown mangroves alongside them which is important to protect during the rehabilitation work. The causeway located south of the island toward Temotu village has a massive coverage of mangrove grow alongside it to the lagoon side, and a small patch of the sea grass found at the ocean side. Beach accretion and erosion mostly happened at the two northern causeways of either one end accreted or eroded.
- The causeways are typically situated quite far from the villages or populated areas, being at least 400 m – 500 m away. Only Teuabu causeway has settlements within a distance of 30 m to 40 m away at both ends of the causeway.

The lagoon has numerous shoals and sandbanks and there is a narrow opening in the western reefs that allows access to the large lagoon by medium sized vessels.

The beach front along the lagoon shore can be either sand, exposed coral platform or both and is connected to a mud flat that stretches to the deeper lagoon. Often the mud flat area is fully exposed during the spring low tide. The width of the exposed area or the distance between the beach and deeper lagoon varies a lot but ranges between <100 m to >1 km.

Coastal erosion is a serious problem on Nonouti, resulting in the forced relocation of infrastructure (roads, buildings, etc.). Likewise flooding is common. It can be knee depth during high spring tides at several locations, such as areas adjacent to the causeway at Tebuange, Teuabu next to the KPC church, along the causeway between Teuabu and Temanoku causing adjacent areas to have restricted accessibility for vehicles at times.

4.5 Tabiteau South

Tabiteuea South is also in the southern Gilbert group (latitude 1° 21' S, longitude 174° 48' E) (Fig.). It is 11.85 km², 1.89 km at its widest, 0.02 km at its narrowest, and about 29.87 km in length. The land area used as village settlements is about 1.92km².

Figure 4.5 – Tab South



Source: [en/Wikipedia.org/wiki/Tabiteuea_south_island](https://en.wikipedia.org/wiki/Tabiteuea_south_island))

There are 6 villages with Tewai in the north, Taungaeaka, Buariki, Nikutoru, Katabanga and the islet of Takuu at the south (Figure 4.5). Causeways link the islets making up Tabiteuea South. There are two causeways linking Taungaeaka to the islet before the village of Buariki. Also, there are two causeways between Tewai to Taungaeaka. The Katabanga-Takuu causeway broke down and has not been repaired since.

Like all the islands coastal erosion is also the main environmental problem that has required the relocation of several infrastructures (road and buildings).

Four existing causeways will be rehabilitated on the island of Tabiteuea South. Below are the general site descriptions.

- Both ends of the causeways are highly vegetated with salt tolerance shrubs, mainly the Salt-bush (*Scaevola sericea*) and the Beach Heliotrope (*Tournefortia argentea*).
- Alongside the causeways are other grown bush plantshrubs, mangroves and the bantigue (*Pemphis acidula*) locally known as Te Ngea.
- The causeways are built across the inter-tidal reef passages that historically separate and cut/narrow the water flow and movement from the ocean side to the lagoon side during low tides, and vice versa during high tides. All causeways are surrounded by mud flats. The seagrass marine ecosystems found close to causeways number 3 and 4 are habitats for certain seashells and fish species during high tides. The seagrass area near causeway number 3 is about 10 m² on the ocean side, and the seagrass area near causeway number 4 totals about 4,410 m² on both the ocean and lagoon sides. Mangrove coverage of 25m² is present on the northwest ends of both causeways' numbers 1 and 2.
- Sand accretions are at both ends of the causeways.
- Two causeways are situated far away from the villages or populated areas, the closest about 1 km away. One of the causeways runs alongside a fishpond; however, there are no signs of fish inside the pond, which is proliferated with brown algae

4.6 Marine Resources

Abaiang: The study by SPC (Awira et al, 2008) revealed that the reef habitat seems relatively rich and the ecosystem supporting finfish resources is healthy. However, the study noted the fishing pressure on reefs for high demand reef fish for export and consumption. Monitoring management guidelines were proposed so that sustainable limits will not be exceeded.

Densities of the elongate clam, te were (*Tridacna maxima*), within Abaiang atoll were reported in the same study as not being low. However, in recent years the stock has declined tremendously due to the high fishing pressure for export to South Tarawa (pers com). *T. squamosa* and *Hippopus hippopus*, the two faster-growing, large clam species, are rare in Abaiang. *T. gigas* (te kima) stocks in Abaiang have undergone a catastrophic decline in the last decade and a half, and stocks are severely impacted by fishing.

Anadara holoserica (te bun), *Strombus luhuanus* (te nouo) and *Gafrarium* spp. (te koumwara) are abundant over the sea grass habitat on the reef mud flat along the island (pers comm.with locals).

Beru: The lagoon is abundant in fish and shellfish such as the 'kouamwara' (*Gafrarium* spp),

'nikabibi/nikatona' (*Quidnipagus palatam*) and 'katura' (*Atactodea striata*) amongst others making it easy for women to gather for consumption (Office of Te Beretitenti and T'makei Services 2012, Van Dijken and Anderson, 2013). However, there are signs of declining fish numbers, particularly bonefish in the lagoon. The enclosed lagoons at both ends of the islands support a rich variety of marine resources, but there are indications that crabs and shellfish within these enclosed lagoons could decline in the future due to limited water exchange. Like Tabiteuea South there are no major fishing activities for export on the island, so it is assumed that the reef system around the island is healthy.

Nonouti: The survey undertaken by Fisheries (2018) as part of "Enhancing national food security in the context of global climate change project" revealed that the outer reef at the western reef barrier is a healthy reef system supporting wide varieties of fish family species and coral species. On the lagoon mostly at the uninhabited islets sea worm (*Siphonosoma indicus*) and te koikoi (*Asaphis violascens*) predominate.

Nonouti lagoon supports high abundance of bonefish stock and has received preliminary attention from the international angling market. The Island Council has hosted two international "expeditions" to explore the island. These expeditions found catch/release sport fishing for bonefish and trevally at Nonouti potentially attractive to the international market. However, there is a great risk that the communities will deplete the resource, as bonefish is one of the main finfish usually caught for food consumption.

Tabiteuea South: There is limited data on finfish and benthic fauna for Tabiteuea South but result of the social economic survey on the island shows (Office of *te Beretitenti* and T-Makei Services 2012) that the most popular fishing location is the lagoon, with 78% of households fishing in the lagoon and 82% of households collecting food from the lagoon flats during low tide. The lagoon flat is the exposed area of the lagoon during low tide that can stretch for miles and is a favorite fishing location for shellfish and sea worms. By contrast, only 20% of households fish in the deep ocean, which requires a canoe or boat. In 2010 there were only 14 boats and 43 canoes, between the 249 households on Tabiteuea South. There are no major fishing activities for export on the island so it is assumed that the reef system is healthy.

4.7 Marine Pollution

The country's transition from a traditional subsistence lifestyle to a market-based economy has brought with it several environmental challenges adversely affecting the health of Kiribati's coasts. Key challenges include increasing waste and pollution in lagoons and coastal areas and the unsustainable depletion of coastal fisheries resources. These challenges are most evident in the heavily populated urban center of Betio, South Tarawa but can also be seen on the islands. The main types of waste and pollutants affecting the health of Kiribati's coastal fisheries and lagoon ecosystems and associated ecosystems are mismanaged solid waste and sewage discharge, agricultural run-off and pollutants around maritime landing areas. Lack of integrated waste management of these pollutants is a key threat to the marine environments of Kiribati.

Disposal of solid waste from commercial activities such as from mechanical shops which directly dispose of waste oil into the ground or along the shoreline is a threat to the freshness and cleanliness of water lenses. In South Tarawa, sewage collected is discharged to the sea at the three main centres of Betio, Bairiki and Bikenibeu. However, in Tarawa and the islands the beach is still being used as toilet by many people, even by those that have flush toilets or pit latrines. Furthermore, the habit of disposing of rubbish, especially into the sea, is also polluting beaches, coastal waters and lagoons. Solid waste is now collected by the two South Tarawa local councils within their respective jurisdictions, but in the islands it appears most rubbish is burned or buried. A lot of community education on proper disposing of solid waste is still required to ensure a healthy and clean environment can persist.

Although work in this area has advanced, there is limited knowledge on the impacts of pollution on the status of coastal ecosystems and fisheries. The Kiribati Integrated Environment Policy (2012) specifies some actions to address coastal and marine pollution, including establishment of a National Marine Pollution Advisory Committee that has prepared a national marine spill contingency plan to address the discharge of oils, chemicals and hazardous and noxious materials into the marine environment. However, further attention on the impacts of pollution from all sources on the health of the coastal ecosystems will be essential to ensuring the long-term viability of the coastal resources and the health of the island populations dependent on them.

4.8 Marine Protected Areas and Wildlife Sanctuaries

The Phoenix Islands Marine Protected Area has been identified by MELAD as the only protected area in Kiribati that is formally recognized at an international level. In addition, there are wildlife sanctuaries located in Kiritimati Island. These areas are very distant from the subject islands for KOITIIP.

Phoenix Islands Protected Area is Kiribati's only protected area with 408,250km² holding some of the world's most pristine coral reefs as well as a great abundance and diversity of tropical marine life. The area was established in 2010 under Kiribati's commitment under the Convention on Biological Diversity.

The entire island of Kiritimati is a Wildlife Sanctuary and breeding ground in the Pacific for seabirds, supporting 18 different species of birds. Nine protected zones are designated to support the breeding and nesting of the various bird species.

Interviews with the Ministry of Fisheries and Marine Resources Development in 2019 indicated that two locally defined Marine Protected Areas have been declared at the far north of Abaiang around Ribono and Nuotaea islets with the purpose of allowing stocks of various fish and shellfish to recover as numbers have been reported to be in decline in recent years.

4.9 Climate Change and Natural Hazards

4.9.1 Climate Change

It is widely recognized that Pacific Island nations are among the world’s most physically and economically vulnerable to climate change and extreme weather events and Kiribati is one of the most vulnerable countries in the world.

This section provides a brief review of the future changes to climate in and the specific changes to temperature, rainfall, oceans and extreme events for Kiribati and the outer islands considered under the Climate Risk and Vulnerability Analysis (CRVA) conducted by ADB for this project. Broadly speaking, climate changes are expected in the form of (i) increases in mean temperature; (ii) increases in rainfall and less drought, (iii) rises in mean sea level [about 33cm under worst case predictions compounded by high tides and storm surges]; (iv) increased sea temperature by several degrees and possible coral bleaching; and (v) acidification of seawater bringing damage to coral reefs through dissolution. Due to location, cyclones are not expected to affect Kiribati more frequently and inundation threats are more likely to arise from high tides and storm surges. Broader changes to climate in the North-West Pacific Region are included in the full Climate Risk and Vulnerability Assessment (CRVA). The projection years of 2050 and 2080 were chosen for the CRVA analysis, consistent with the expected design life of the deliverable project infrastructure.

4.9.2 Assessing Kiribati’s Changing Climate

Surface air temperature and sea-surface temperature. Annual mean temperatures and extremely high daily temperatures will continue to rise and warming will be large compared to natural variability. Temperatures in Kiribati have warmed and will continue to warm with more very hot days in future. The annual average air temperature and sea-surface temperature will also increase. By 2030 this increase may be as high as 1.6°C by 2050 and 3.0°C by 2090 under the worst cases. The annual mean temperature in Abaiang could increase from 28.12 °C to 30.44°C by 2080. Similar mean temperature increases are expected for the other three atolls. Extreme maximum temperatures are also projected to increase.

Annual and seasonal mean rainfall. Most models predict increased average annual and seasonal rainfall in the 21st century. In Kiribati extreme rainfall events are projected to increase, and drought to decrease. Droughts, usually associated with La Niña years, can be severe in Kiribati, however average rainfall is predicted to increase and there is moderate confidence that the number of droughts will decrease. Forecasts for Kiribati also suggest both increased average monthly rainfall in 2080 and show more frequent extreme rainfall days with greater intensity. However, none of these increases are significantly different from zero (no change in precipitation), suggesting uncertainty over whether any change in average precipitation levels will occur.

Mean sea-level rise. Sea level near Kiribati has risen and will continue to rise throughout this century. By 2030, under the worst case sea level rise in the range of 7–17cm is forecast. By the end of the century sea levels around the Pacific are projected to rise by at least 26-55 cm

The sea-level rise (SLR) near Kiribati measured by satellite altimeters since 1993 ranges from 1–4 mm per year, compared with the global average of 3.2 ± 0.4 mm per year. The change is partly linked to a pattern related to climate variability from year to year and decade to decade.

Sea-level rise combined with natural year-to-year changes will accentuate the impact of storm surges and coastal flooding, especially for the low-lying atolls of Kiribati, which are on average only 2 meters above sea level. Figure 4.6 provides a summary of sea-level rise projections for the Gilbert Islands for four scenarios, illustrating the expected sea-level rise that the target islands will have to contend with through to 2090.

Figure 4.6. Sea Level Rise projections for the Gilbert Islands, Kiribati.

	2030 (cm)	2050 (cm)	2070 (cm)	2090 (cm)
Gilbert Islands				
Very low emissions scenario	7–17	13–29	18–44	23–59
Low emissions scenario	7–16	13–30	20–47	27–66
Medium emissions scenario	7–16	13–29	19–46	28–67
Very high emissions scenario	7–17	16–33	26–56	38–87

SOURCE: Australian Bureau of Meteorology and CSIRO, 2014.

However, even moderate SLR can result in extreme sea level events associated with high tides and storm surges that will occur more frequently. In Kiribati the perception is that king tides have become more frequent. This would be due to a combination of increased frequency of La Niña which forces sea levels to increase; further exacerbated by sea-level rise. E.g. average hours that sea levels exceeded a level of 2.8m above SEAFRAME datum in the 1970s was just over 5 hours per year. This exceedance has subsequently increased (e.g. over 28 hours between 2000 and 2008).

Long-term sea-level rise will continue to push sea levels higher resulting in high tide levels exceeding current king-tide levels more frequently. By convention (“rule of thumb”) occurrence of flooding events trebles for every 0.1m of sea-level rise. Therefore, transport infrastructure designed for a 1-in-100-year flooding event (a common design criterion), could experience the same flood every few months after the sea level had risen 0.5 m.

Extreme storms, storm surges and cyclones. Kiribati lies just outside the main tropical cyclone belt in Southwest Pacific. Tropical cyclones hit about once per year, and rarely pass within 400km of Kiribati. Three cyclones passed within 400 km of both Arorae Island (west) and Caroline Island (east) between 1969/70 and 2009/10. Whilst all of the project islands are located outside the major cyclone path and of low to moderate cyclone risk, the Gilbert Islands are considered to be vulnerable to other important extremes including extreme sea levels and storm surges associated with an increase in the incidence of cyclones and extreme storm events. There is a greater increase in losses projected for more extreme events.

However, it should also be noted though that there is considerable variation in cyclone and storm hazard patterns across the archipelago and even between islands in the same atoll, due to local variation in

geophysical and climatic factors. Coastal inundation is a constant concern on low-lying islands in Kiribati. Because Kiribati is close to the equator (latitude 1°N), it is not threatened by cyclone-generated inundation. Rather, inundation is expected to be triggered by high storm tide levels or swells, or the occurrence of extreme storm and tropical cyclone activity, together. For example, the northern atolls face a greater risk of cyclonic winds and storm surges than the southern atolls, where the risk is much lower because of proximity to the equator.

Increasing Sea Surface Temperatures. Sea surface temperatures locally have risen gradually since the 1970s by approximately 0.15°C per decade and there is high confidence that sea surface temperature will increase by 0.4-1.0°C by 2030 and 2-4°C by 2090.

Ocean acidification. Ocean acidification due to dissolution of carbon dioxide has been slowly increasing (reducing the pH) in Kiribati's waters for two centuries (Pacific Climate Change Science Program – PCCSP) for Kiribati for the 21st century and will continue to increase, threatening coral reef ecosystems.

4.9.3 Effects of Changing Climate

The effects of sea level rise, storm surge, coastal erosion and saltwater intrusion increase Kiribati's vulnerability given that most of its atolls are only 1.8 meters above sea level. Sea-level rise also threatens saltwater intrusion and the loss of the freshwater lenses under the islands.

Forecasts from recent scientific studies show that climate change is also likely to have substantial impacts on Kiribati coastal and oceanic fisheries, their habitats and reefs. Climate change is projected to alter ocean temperatures and currents, with resulting impacts on oceanic marine ecosystems.

In 2008, SPC released a policy brief that summarized the findings of an ongoing study into climate change impacts on Pacific fisheries. The policy brief noted that national plans to optimize benefits from fisheries should be adapted to the likely changes in environmental conditions caused by climate change.

Decline in coral reefs and coastal fisheries. Rising sea surface temperatures and more acidic oceans will likely impact on the growth of hard corals (and their complex fish habitats). Degraded coral reefs are likely to support different types of fish and perhaps lower yields. This may be a significant concern for Kiribati as it is likely to result in reduced catches of reef fish, with significant ramifications for food security and fisheries development.

Damage to infrastructure. More powerful storms are predicted, with increased risks of damage to wharfs and essential infrastructure. This may also create higher financial risks for operations in coastal areas due to more frequent damage to structures and equipment.

4.9.4 Natural Hazards

Unlike many other Pacific islands, Tarawa and other islands of the Gilbert Group rarely experience cyclones as it lies outside the main cyclone belt. However, they are susceptible to storm surges and to droughts, particularly during La Niña events. Prolonged drought periods were encountered in 1988 to early 1989, followed by another in 1998 extending into mid-1999 and resulting in the loss of many valuable food crops including coconuts (*Cocos nucifera*) and breadfruits (*Artocarpus sp.*).

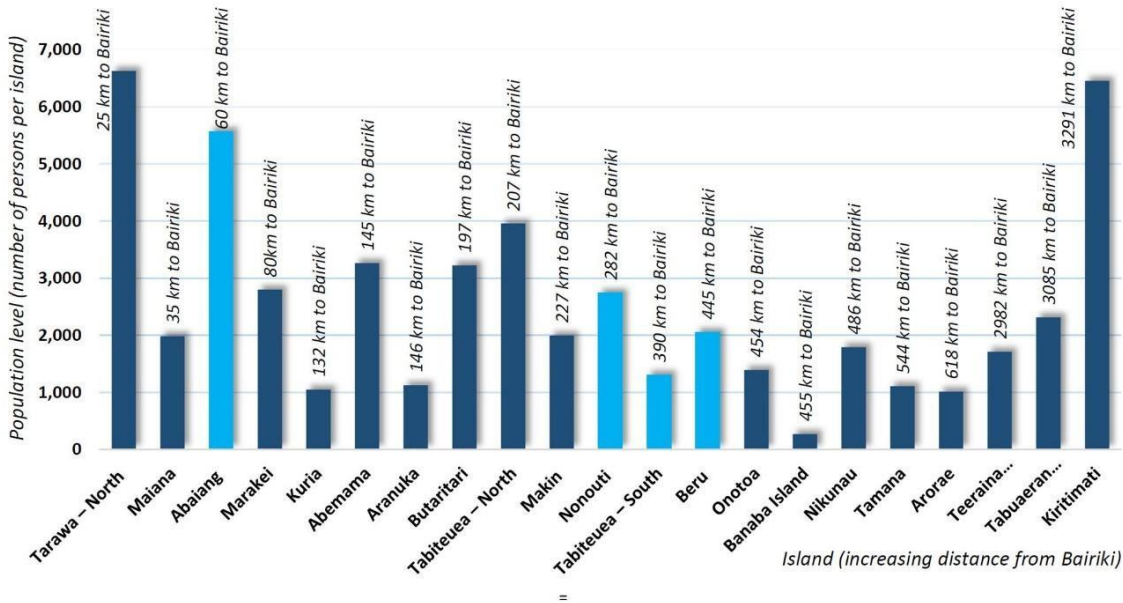
4.10 Socio-Economic Environment

4.10.1 Population

Twenty-one of the islands are inhabited by a national population of around 114,000, with the majority residing on the Gilberts group of islands. The outer-islands population ranges from a few thousand to

less than a hundred across the different island chains, with approximately 51% of the country’s population living in the capital on South Tarawa (within the Gilberts). The population is mainly rural and growing, with average 3.7 children and life expectancy 66.1 years (2015).

Figure 4.7 – Population in Kiribati



Source: 2015 Population and housing Census

Ninety percent of the total I-Kiribati population is of indigenous origin, the remaining proportion being non-indigenous Chinese and Europeans, many of whom have married indigenous partners. Of the population over the age of 3 at the time of the 2010 census, 92% read Kiribati (Gilbertese), and 76% read English. Some in-married individuals of Tuvaluan origin might speak Tuvaluan with each other, but there is no distinct discrete group that speaks another language. South Tarawa is a magnet for internal migration from the outer islands as it provides opportunities for employment and consumption, as well as access to higher education and specialist social services not available elsewhere in Kiribati.

Importantly, Kiribati is experiencing an acute rise in environmental and socio-economic problems caused by over-population, while at the same time lacking a sufficient population with the necessary qualification base to readily support the development of high-level skills in government and industry. The population of South Tarawa is growing very rapidly. It grew by almost 10,000 people between 2005 and 2010, an annual population growth of 4.4%. Overpopulation on South Tarawa is a growing concern as the population density is now reaching a level of 3184 people/km² (2010 census), which is about 22 times the national average of 142/km².

Most of the outer islands are experiencing a decline in population with Beru recording a 0.7% population decline from 2010 (pop. 2,099) to 2015 (pop. 2,051). Similarly, Nonouti experienced a significant drop in population from 2000 (pop. 3,176) to 2015 (pop. 2,743), where 40% of the population is under 15 years and the largest age group is 0 to 5 years of age. The population in Abaiang in 2015 was estimated at 5,568. Tabiteuea South has a more stable population, measuring 1,290 persons in 2010 and 1,306 in

2015. Improved outer island access may stimulate the economy and improve service provisions to counteract drift to urban areas.

4.10.2 Indigenous Peoples

The project does not trigger the ADB's SPS with respect to Indigenous Peoples and affected people do not meet the characteristics of WB policy OP 4.10 on Indigenous Peoples due to the homogenous nature of Kiribati population. The inhabitants of the four outer islands are part of mainstream I-Kiribati society and are not considered to have a distinct cultural heritage or a different language and are not discriminated upon by other local groups due to their language, skin color or education level etc. They will not require protection and special attention from the project on the basis of being indigenous.

No tribal groups exist in Kiribati. Clans comprise extended families. There is no island where those who are other than I-Kiribati reside as a bloc; residence is a random mix that relates to marriage and custom. Islands may have local myths and cultural practices regarding land ownership and inheritance that have evolved in earlier isolation but cannot be construed as discriminatory on the basis of indigeneity/ethnic status, which is specifically prohibited under Article 15 of the Constitution.

4.10.3 Economic trends

Growth is volatile, however Kiribati has seen seven consecutive years of growth up to 2017 driven by fisheries revenues, construction, wholesale and retail trade. Inflation has been low and stable in recent years, and the fiscal position has improved markedly due to high fishing license fee revenue contributing to consistent surpluses. Outside of fisheries, the country has few natural resources, mostly infertile and porous soil, and is remote from international markets and trade routes. Further, due to climate uncertainty it is seen as a risky environment to conduct business. Private sector development opportunities are highly constrained by the lack of economies of scale possible in such a small and fragmented domestic market that is extremely remote from large markets abroad.

4.10.4 Employment and Livelihoods

Kiribati population census of 2010 recorded high unemployment at 30.6% and youth, which make up 57% of the population, experiencing even higher rates of unemployment at 54%. The public sector accounts for nearly 80% of all jobs in the formal sector, while the private sector remains underdeveloped. The 2006 HEIS report stated that 38 percent of the adult population (44% of men and 33% of women) were currently engaged in work activity. Around 28 percent of men and 18 percent of women were working for wages and salaries in either full-time or part-time work. Nearly 4 percent of men and 4.6 percent of women were working in their own business or selling produce, and 11.8 percent of men and 10.8 percent of women were working mainly for subsistence.

The public service is the largest employer in Kiribati. Data provided from the GOK indicates that 5,168 public service posts were established in 2018, an increase from 4,952 in 2017. Almost all households in Abaiang, Beru, Nonouti and Tab South are involved in trading of copra and fish and seafood. With limited job opportunities, the primary economic activity for women on outer islands is trading of copra and fresh fish and handicrafts. On the four islands identified by KOITIIP there is a total of 31 business registered as women owned (Abaiang 14, Beru 3, Nonouti 2 and Tab. South 12), however, almost all other women are involved in informal trading.

Livelihood is mainly at the subsistence farming and artisanal fishing level, especially outside of the urban center of South Tarawa. Limited access to land and its limited suitability for agriculture has led to food

insecurity and malnutrition and led the country to rely heavily on imported goods. The latest Household Income and Expenditure Survey (HIES) done in 2006 showed food poverty (based on national poverty lines) to be low in Kiribati, at about 5 percent of the population, but basic needs poverty (based on national poverty lines) to be relatively widespread, at about 22 percent. Poverty rates varied significantly by island group, depending on available economic opportunities, the extent of isolation, and the age structure of the population. For instance, about 16 percent of the population of the Southern Gilbert Islands were found to be below the food poverty line, reflecting isolation, limited agricultural potential, and vulnerability to drought. These islands had the highest proportion of elderly people in the country, and a low proportion of working age adults. A large proportion of the population was found to be vulnerable to falling into poverty.

4.10.5 Poverty

Poverty trends in Kiribati are difficult to assess given the infrequency of data collection. The 2006 Household Income and Expenditure Survey (HIES) showed that the poverty rate was 34.6% based on the lower MIC poverty line and 12.9% based on the international poverty line. Poverty rates were relatively higher in South Tarawa (24.2%) and the rest of the Gilbert Islands (22%) compared to the Line and Phoenix Islands (8.9%). The Gini Coefficient was 37, which is below the regional average.

4.10.6 Trade

Kiribati main exports are coconut products and fish, with annual exports of around \$7m annually versus \$100m expenditure on imports. The Kiribati Development Plan seeks to implement export diversification strategies through coconut and fisheries sector development and stimulate investment in the outer islands. Small and medium-sized businesses on outer islands will directly benefit from improved, safe inter-island connectivity, which will indirectly benefit local communities through increased employment opportunities, potential increase to tourism revenues and access to goods and services.

4.11 Gender Roles in the Outlying Islands

GOK development plans conclude gender discrimination is culturally entrenched and will take time to rectify. Gender inequality and mitigation measure are covered in section 6 with a brief summary here of conditions prevailing in Kiribati and the outer islands. Women are underrepresented in most walks of life outside the home and businesses are mainly controlled by men. Women engage mostly in home-based activities including, care work, subsistence agriculture, marketing agricultural products, and trading. Gender Based Violence (GBV) rates in Kiribati are high and more than half of married women have experienced some form of violence.

Outer island women's lives are further complicated by inaccessibility, poor economic chances and essential services being almost non-existent. Discrimination creates severe limitations to mobility, decision making and increases vulnerability to GBV. As they are dependent on unreliable transportation by sea or by air access to secondary education, health care, banking, employment and economic opportunities are limited. GOK employment opportunities in administration, teaching, social welfare and public infrastructure are filled employees from Tarawa. Thus economic activities for women are generally limited to trading handicrafts, copra and fresh food including fish. There are 31 women owned businesses registered the four KOITIIP islands (Abaiang 14, Beru 3, Nonouti 2 and Tab. South 12) and most other women are involved in informal trading.

Unreliable access to boat travel is considered unsafe for women and families but trading requires transportation of goods by boat to other islands. Poor boats, unpredictable schedules and limitations to

mooring at high tide create difficulties for women dependent on income generated from trading. Boats being moored offshore means walking across long beaches or taking shuttles to the shore and an inability to shift cargo easily, without assistance. Wading to shore is often not possible for women helping small children and elderly or disabled relatives thus further limiting access to services available in South Tarawa.

In outer islands, few women are being involved in non-traditional sectors, such as engineering, plumbing, carpentry, construction and maritime related professions and are unable to access work experience. There is high competition for employment opportunities and discriminatory attitudes towards women make it difficult for women to develop experience to underpin future employment opportunities and access to vocational education in South Tarawa. Additional advocacy is needed to promote women's employment and few women in outer islands work in male-dominated sectors (such as police). In outer islands men claim that women speaking or working with unfamiliar men causes jealousy and contributes to increasing risks of violence against women.

Availability of alcohol, high unemployment, over-crowding and high living cost drive high levels of gender based violence in South Tarawa. However, a lack of reporting in outer islands due to the GBV stigma and less progressive gender attitudes suggests high GBV may also be present but hidden. Abaiang police indicated call outs were predominantly for domestic violence involving alcohol. Assistant Social Welfare Officer (ASWO) in Abaiang reported handling 40 cases by August in 2019 whereas in Tab. South the ASWO and police did not report any GBV cases in 12 months.

The GOK national SafeNet referral system is being established (with support from World Bank, UN Women and Government of Australia) to link health, police and social welfare services. Although not completed nationally, Abaiang has a SafeNet committee and ASWO officers providing basic counselling, awareness and prevention advice and evacuation. Beru, Tab South and Nonouti have ASWOs in place, but coordinated services are lacking. SafeNet refer serious GBV cases to South Tarawa.

GOK Ministries are not required to report on their gender work and whereas certain ministries have more than 25 percent female staff, most of these are administrative positions with some female engineers, inspectors and supervisors. Women working in the implementing agencies face challenges working in a male-dominated sector including harassment and inappropriate behavior by men causing women to feel unsafe to participate in certain work-related matters. The Kiribati Occupational Health Safety and Welfare Act (2015), Ministry of Labour Access and Equality Plan (2010) and the Convention on the Elimination of All forms of Discrimination Against Women (CEDAW) to which Kiribati is a signatory all promote safe workplaces in Kiribati. However, these laws and policies have not been operationalised within the stakeholder ministries. Further capacity development is necessary in the stakeholder ministries to better understand and mitigate gender related risks and provide a safe working environment for women.

A gender assessment has been developed (Annex 2) which aims to improve women's access to services and economic opportunities in the outer islands and promote safe employment and professional development opportunities for women working in transport sector. Gender action will also aim to build the institutional capacity within the stakeholder ministries on effective gender mainstreaming strategies and operationalize GoK commitments on gender-based violence (GBV) and safe workplaces.

The preliminary GENDER ASSESSMENT presents a grievance redress mechanism, specifically for GBV concerns, that will link with the existing GoK SafeNet and handle all GBV complaints in and around the project site. Complaints about perpetrators not linked to the project can also be handled by the GRM. Complaints can still be made via existing complaints mechanisms in Kiribati national free call Help Line 191, face to face or via SMS to a number that will be set up by the OIIU. Complaints can be received by the project GRM Operator or SafeNet members operating in or around the project site. Complaints can be made by complainants, community members, leaders or colleagues.

The existing GOK SafeNet will also be used by the GRM Operator to refer and handle complaints. The project will seek to develop an MOU between the Ministry of Women, Youth and Sport (MWYSSA) and the project to ensure that all GBV complaints will be processed through the GoK network and referral networks will be accessed for support and resolution.

The Gender Action Plan, GBV Framework, Grievance Redress Mechanism and draft Code of Practice are presented in Annex III.

5 Legal, Policy Framework and Regulatory Requirements

5.1 Kiribati Environmental Laws and Policies

5.1.1 Environment Act 1999

The Environment Act 1999 (as amended 2007) is the primary environmental legislation that provides for the protection, improvement and conservation of the Republic of Kiribati. The Act is supported by the Environmental (General) Regulations of 2017 (which repeal previous regulations to the act). Under Part IV of the Environment (Amendment) Act 2007 an Environment License is required for all activities that are deemed environmentally significant, as listed under the Schedule of the Regulation.

The 1999 Act established the Environment and Conservation Division (ECD) within the Ministry of Environment, Land and Agricultural Development (MELAD) as the line Division with the mandate for environmental protection, resource conservation and sustainable development. The ECD must respond to all environmental safeguard issues arising in Kiribati. This includes advising project proponents on environment license requirements including need for environmental impact assessment (EIA), inspecting environmental violations and compliance issues and providing enforcement to correct non-compliance. The ECD must also deliver environmental communication, education and public awareness on Kiribati's environment protection and management and protection requirements at the local, national, regional and international level.

The Environment Act provides for the protection, restoration and enhancement of Kiribati's natural, social and cultural environment with the following objectives:

- a) to provide for and establish integrated systems of development control, environmental impact assessment and pollution control;
- b) to prevent, control and monitor pollution;
- c) to reduce risks to human health and prevent the degradation of the environment by all practical means, including the following —
 - i. regulating the discharge of pollutants to the air, water or land;
 - ii. regulating the transport, collection, treatment, storage and disposal of wastes;
 - iii. promoting recycling, re-use, reduction, composting and recovery of materials in an economically viable manner; and
 - iv. to comply with and give effect to regional and international conventions and obligations relating to the environment;
- d) protecting and conserving the natural resources threatened by human activities, particularly those resources of national and ecological significance as may be classified under the categories of terrestrial vegetation, coral, fish and marine life.

5.1.2 Environment (General) Regulations, 2017

The Environment (General) Regulations 2017 compliment the Environment Act and provide the requirements for the project applicant to obtain an environment license.

The Regulations set out requirements for the environmental impact assessment (EIA) report of the development. Environmentally significant activities requiring EIA according to their environmental significance are listed in the schedule to the Regulations. Activities that are considered to create a significant environmental impact require application for environmental license. Some activities further require an EIA report.

Environment licenses are required from MELAD for all activities that are deemed environmentally significant. When a proponent wishes to undertake a project, the Schedule of Environmentally Significant Activities should be consulted to determine if the activity might trigger an environmental assessment. Any construction work designed to enable an ESA also requires an environment License. If the type of work is not found in the Schedule and if it does not involve permanent loss of land or coastline, or deal with any polluting materials, no further environmental considerations are needed. However, if it does match one or more of the activities on the list a license application must be completed and submitted to ECD.

An Environmental License(s) for the KOITIIP will be required in due course. Any conditions of the license should be disclosed and additional licenses relating to extraction of construction materials or coastal protection works may also be required, which will necessitate preparation of an Environmental Management Plan, to ensure that environmental effects of coastal protection works during the operational phase, together with monitoring of these and provision of mitigation measures, are properly addressed.

5.1.3 Environmental License Process

The Environment Act is complimented by the Environment (General) Regulations 2017. The overall process assigns primary responsibility for undertaking environmental assessment of projects to the project developer. The Ministry of Environment, Lands and Agricultural Development (MELAD), under the direction of the Principal Environment Officer (PEO), is responsible for review and approval of environmental assessment reports, prescription of requirements for publication and disclosure environmental assessment reports, issuance of environment licenses, and prescription of any conditions to the licenses that require the applicant for the environment license to submit an application to the Principal Environment Officer (PEO).

On consideration of the application, the PEO determines whether to issue an environmental license or require an environmental impact assessment, or to refuse the application. The required contents of the environmental assessment report are set out in the Environment (General) Regulations, 2017.

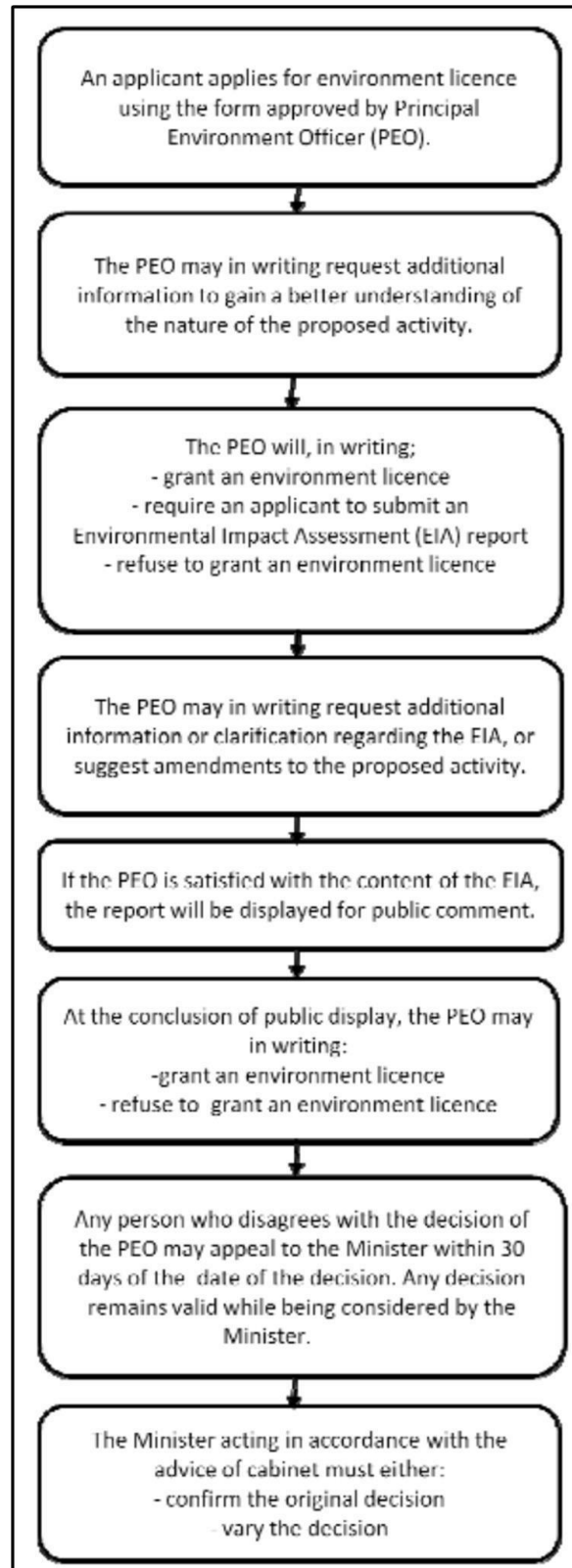
During preparation of the environmental impact assessment report (EIA) the applicant is required to hold consultations with stakeholders such as adjacent landowners and other interested parties.

The completed EIA is reviewed by the PEO who determines the appropriate form of its publication and disclosure to interested parties, and the deadline for receipt of comments. Comments received must be shown to the applicant and taken into consideration in finalizing the EIA.

After review final EIA the PEO decides whether to grant a license. The decision to grant the license rests with the PEO according to the principles of sustainable development and in line with any of Kiribati's binding international obligations or agreements and any other prescribed requirements. Licenses may be subject to reasonable conditions made according to the principles of sustainable development; which may include duration, location, prescribed methods, emission limits, monitoring and reporting requirements, lodgment of bonds and payment of fees, preparation of plans and specific mitigation.

The environmental License application process is outlined in Figure 5.1. If there are no objections within the 30-day period, the license is issued, construction can begin, and the assessment process is essentially complete. The ECD is then responsible to monitor the activity's progress to ensure compliance with the license conditions.

Figure 5.1 – Kiribati Environmental Approvals Application Process



5.1.4 Land Acquisition and Lease Approvals

Native Lands Act and Amendment 2011 and The Native Lands Ordinance (Cap. 61, 1977) provides for native land and registration of title thereto and as well regulates (restrictions to) alienation of native lands. Native in this context generally refers to any aboriginal inhabitant and descendants thereof, whether wholly or partly of aboriginal descendant. The State Acquisition of Lands Ordinance (Cap. 95B) 1979 is a current law that regulates compulsory acquisition of land by the Republic for public purposes absolutely or for a specified term. Thus, the Native Lands Ordinance and State Acquisition of Lands Ordinance provide for land alienation (native or non-native) and acquisitions.

The Land Planning Ordinance (Cap.48, 1977) is the legal instrument that allows for the designations of land for specific purposes (e.g. water reserve protection) and defines a general land use plan as “indicating the use or class of use to which every part of the land depicted thereon maybe permitted to be put on for development or redevelopment”.

5.1.5 Health and Safety

The Kiribati Occupational Health and Safety Act 2015 intends to achieve the intended purposes inherent in the Occupational Safety and Health Convention 1981, the 2002 Protocol on Occupational Safety and Health, and the Promotional Framework for Occupational Safety and Health Convention 2008. The 2015 Occupational Health and Safety Act set the country’s first comprehensive framework for occupational safety and health standards for the workplace. The Ministry of Labor and Human Resources Development is responsible for enforcing the standards. Employers are liable for the expenses of workers injured on the job. By law workers may remove themselves from situations that endanger their health or safety without threat to their employment.

5.1.6 Wildlife/Biodiversity Conservation

The Wildlife Conservation Ordinance, Chapter 100, revised edition 1977, provides legal protection to Kiribati’s wildlife, under the responsibility of the Ministry of Environment, Lands and Agricultural Development.

The Wildlife Conservation Ordinance (1977) allows the Minister to declare areas as wildlife sanctuaries and protection of specific animal and bird species. Within a wildlife sanctuary no person shall hunt, kill or capture any bird or other animal (other than a fish) or search for, take or willfully destroy, break or damage the eggs or nest of any bird or other animal. “Closed areas” are wildlife sanctuary areas which are only accessible by license holders, wildlife wardens and public officers.

MELAD are also responsible for administering the Biosecurity Act 2011 which controls the movement of plants and animals and their products in order to prevent the establishment and spread of animal and plant pests and diseases that can harm human health and the agricultural economy of a country. The Biosecurity Act 2011 establishes a regime to control the import and export of regulated pests and diseases (Parts 2, 3, 4 and 5). The biosecurity functions of the Government are set out in section 6. The key administrative feature is the provision in Part 10 for the designation of a Director of Biosecurity and biosecurity officers for Kiribati.

Land put aside for reserves has three main pieces of legislation. The Recreational Reserves Act 1996 allows for land owned or leased by the Government to be reserved for recreational purposes for the use and enjoyment of the people of Kiribati. The Prohibited Areas Ordinance 1957 provides for certain islands and their territorial waters to be prohibited areas, set aside for conservation purposes. The

Closed Districts Act 1990 allows for parts of islands to be declared for conservation purposes. A summary of the main relevant GOK laws is presented in Annex 3.

5.1.7 Other relevant plans and policies:

Kiribati Biodiversity Strategy and Action Plan (K-NBSAP) (2005). Governmental commitments to site conservation include the K-NBSAP, which commits Kiribati to meeting the Convention on Biodiversity (CBD) Aichi goals of 10% land and marine conservation by 2020. Government of Kiribati is a CBD signatory which enjoins Parties to establish “a system of protected areas or areas where special measures need to be taken to conserve biological diversity”⁷.

Kiribati Development Plan (KDP) (2016-2019) and Kiribati Vision 2020 (KV20). The KDP for 2016-19 is the guide for formulating policies and programs to advance inclusive economic development in Kiribati. The KDP and KV20 emphasize that increasing sustainable returns from fisheries is critical to ensuring inclusive growth and private sector development. The KDP focuses on six priority areas: (i) human resource development; (ii) economic growth and poverty reduction; (iii) health; (iv) environment; (v) governance; and (vi) infrastructure. Among the strategies under the economic growth and poverty reduction priority are providing for the sustainable development of the fishing industry, maximizing economic returns from marine resources and ensuring that the most vulnerable groups in the population are cared for.

This National Tourism Action Plan (2009-2014) was designed to provide the necessary strategies to stimulate a sustainable tourism industry that helps support the economy, community and the people of Kiribati. The plan explored a five-year vision for the Government of Kiribati to strive to achieve by the year 2014. The plan provided the vision, goals, targets and actions necessary to meet the challenges and capitalise on the tourism opportunities available for Kiribati.

International Conventions

5.1.8 International Context

Kiribati is a signatory to a number of international agreements. Listed below are some of the more applicable agreements to the type of activities of the PROP project. This list is not exhaustive:

Convention for the Protection of the World Cultural and Natural Heritage (2004). This convention founded the UNESCO World Heritage Site List (the List). To be a site on the List, it must be a place of special cultural or physical significance. There are no sites of outstanding cultural or natural importance on any of the four outer islands.

Convention on Biological Diversity (CBD) (1998). The CBD has three main goals: conservation of biodiversity; sustainable use of biodiversity; and the fair and equitable sharing of benefits arising from the use of genetic resources. There are no interventions under KOITIIP that would interact with CBD targets. However, Kiribati has developed the Biodiversity Strategy and Action Plan (K-NBSAP), in which Kiribati commits to meeting the CBD goals of 10% land and marine conservation by 2020.

United Nations Convention on the Law of the Sea (UNCLOS) (1982). Kiribati signed the treaty in 2003 but has not yet ratified the agreement. The convention sets out regime of laws governing all uses of the oceans and their resources. UNCLOS includes general obligations of States to protect and preserve the

⁷ MELAD, 2012, Action Plan for Implementing the Convention on Biological Diversity’s Programme of Work on Protected Areas (Kiribati)

marine environment and requires States to endeavour to monitor the effects of any activities that may pollute the marine environment and conduct environmental assessments to assess potential changes. The environmental laws of Kiribati generally encompass provisions to satisfy the requirements of UNCLOS.

The following conventions, protocols and regional agreements also have general relevance for Kiribati: (i) Convention on Biological Diversity, (ii) Cartagena Protocol, (iii) World Heritage Convention, (iv) Framework Convention on Climate Change, (v) Regional Seas Convention, (vi) Convention to Combat Desertification, (vii) The Vienna Convention and Montreal Protocol on Ozone Depleting Substances, (viii) Basel Convention and Waigani Convention to control the trans-boundary movements and disposal of hazardous wastes, (ix) CITES (International trade in endangered species), (x) Stockholm Convention International, (xi) Convention for the Protection of World Cultural and National Heritage, and (xii) MARPOL 75/78 – Protocol to the International convention for the prevention of pollution from ships, (xiii) International Convention on Standards of Training, Certification and Watch-keeping for Seafarers.

5.2 World Bank Policies

The KOITIIP has been screened as Category B as the environmental and social outcomes are mostly beneficial and the residual risks are low to moderate and can be readily mitigated. The World Bank policies triggered for the program include OP 4.01 Environmental Assessment; OP 4.04 Natural Habitats; and 4.12 Involuntary Resettlement. Detailed information on Bank safeguard policies are available at <http://go.worldbank.org/4D2JSWFIW0>.

The safeguard operational policies (OPs) that apply to the program are:

OP 4.01 Environmental Assessment – This policy requires the conduct of an environmental assessment (EA) of projects/programs proposed for Bank financing to help ensure that they are environmentally and socially sound and sustainable. This is the umbrella policy for the Bank's environmental and social safeguard policies.

This project is jointly co-financed with ADB. As the World Bank is taking the lead role in the project, it has been agreed with the WB safeguards policies and procedures will be applied in the preparation of the safeguards instruments.

No physical works will be completed in the first year to allow for the completion of studies and detailed design work. As such, an Environmental and Social Management Framework (ESMF) has been developed to provide guidance on due diligence requirements for sub-projects, including ineligible activities and the safeguards measures and instruments that must be developed for each sub-project.

Once investment design is completed ESIA/IEEs and ESMPs will be prepared for all sub-projects as defined by the ESMF screening process. Should the ESIA identify that an investment is Category A then it will be excluded from the project.

An ESMF will be prepared and disclosed for the potential CERC activities prior to the component's activation.

OP 4.04 Natural Habitats - This policy aims to support the protection, maintenance and rehabilitation of natural habitats and promotes the conservation of natural habitats for long-term sustainable development through a precautionary approach.

The proposed causeway rehabilitation and construction works including the potential installation of culverts may impact on the local and nearby benthic and intertidal habitats. Changes in hydrodynamics resulting from the proposed works may both have positive (better flushing) and negative (erosion/accretion) impacts, which in turn may have impacts on water quality and coastal stability. These impacts are in addition to the more typical construction impacts on natural habitats associated with noise, emissions to air and water, material sourcing, etc. Impacts on natural habitats will be comprehensively assessed and mitigated as necessary in the proposed ESIA/IEEs and ESMPs.

This ESMF and the generic EMP seek to establish the fundamentals of environmental and social assessment needed to reduce impacts from construction in the coastal environments affected.

- **OP-4.12 Involuntary Resettlement** - This policy aims to restrict the involuntary taking of land or any form of economic displacement of populations affected by or participating in World Bank financed activities; and where displacement is unavoidable, to assist persons to improve (or at least restore) their incomes and standards of living; and to identify and accommodate the needs of vulnerable groups. The project is not expected to have severe involuntary resettlement impacts (IR). Government land has been identified for marine facilities in two locations and public land for a third location. In two locations, where government land was not available, private native land has been proposed for a marine facility and a passenger shelter. These sites, which will require new lease agreements, are not inhabited by homes, businesses or settlements of any kind. The project will seek to enter into a voluntary lease agreement with the landowners of these sites. Proposed sites are not immutable. Compensation for a very few coconut trees is anticipated and an Island Council owned bush toilet may need to be relocated to make room to construct one of the maritime landing facilities.

5.3 Asian Development Bank Safeguards Policy Statement (2009)

The ADB's SPS is policy document in respect of safeguards and avoiding, minimizing or mitigating adverse impacts on people and the environment. Safeguard frameworks will: (i) reflect fully the policy objectives and relevant policy principles and safeguard requirements governing preparation and implementation of projects and/or components; (ii) explain the general anticipated impacts of the project and/or components; (iii) specify the requirements that will be followed for subproject screening and categorization, assessment, and planning, information disclosure, meaningful consultation, and grievance redress mechanism; (iv) describe implementation procedures, including budgets, institutional arrangements, and capacity development requirements; (v) specify monitoring and reporting requirements; and (vi) specify the responsibilities and authorities of the borrower/client, ADB, and relevant government agencies in relation to the preparation, submission, review, and clearance of safeguard documents, and monitoring and supervision.

To determine whether the application of safeguard frameworks is appropriate, ADB will assess the borrower's/client's capacity to manage environmental and social impacts and risks and to implement national laws and ADB's requirements. If gaps exist between ADB's requirements and the countries' laws, or where gaps in borrowers' capacity are apparent, the safeguard frameworks should include the details of the specific gap-filling requirements to ensure that policy principles and safeguard requirements are achieved.

ADB's safeguard due diligence emphasizes planning, environmental and social impact assessments and safeguard documentation. Through such due diligence and review, ADB will confirm (i) that all

key potential social and environmental impacts and risks of a project are identified; (ii) that effective measures to avoid, minimize, mitigate, or compensate for the adverse impacts are incorporated into the safeguard plans and project design; (iii) that the borrower/client understands ADB's safeguard policy principles and requirements and has the necessary commitment and capacity to manage the risks adequately; (iv) that, as required, the role of third parties is appropriately defined in the safeguard plans; and (v) that consultations with affected people are conducted in accordance with ADB's requirements.

5.4 Common safeguards approach.

For this project, ADB and WB have developed a common approach to safeguards and social dimension to be applied. It is based on Kiribati's CSS supplemented by additional elements, as required, to also comply with SPS and WB's operational policies. The approach provides direction on the preparation of documents, including environmental assessments, poverty and social assessment, resettlement plans (RP) that will be prepared in line with the resettlement policy framework. A stand-alone Draft RP was prepared during project preparation that will serve as the basis for preparation of updated works based RPs during project implementation.

Government and the development partners have separate monitoring responsibilities. The extent of monitoring activities, including their scope and periodicity, will be commensurate with the project's risks and impacts. Governments, through the implementing agency, are required to implement safeguard measures and relevant safeguard plans, as provided in the legal agreements, and to submit periodic monitoring reports on their implementation performance. Monitoring and supervising of social and environmental safeguards is integrated into the project performance management system. ADB and WB will monitor projects on an ongoing basis until a project completion report is issued.

5.5 Gender Assessment

The gender assessment (Table 5.1) highlights the difference between the applicable Bank safeguard policies and Kiribati's laws, standards and regulations, and relevant measures for addressing key gaps. The processes will be harmonized as much as possible, so that the requirements of Kiribati, ADB and the World Bank will be met with any safeguard instrument that is prepared. The Kiribati law will be adhered to and then any gap filling for ADB and World Bank policies and processes will be completed.

Table 5.1 – Gender Assessment Analysis

Safeguard Requirement	Aspect/ Gender Assessment	Proposed Project Measures
<p>Public Consultation Affected persons/communities are provided timely and relevant information and informed about their options and rights.</p>	<p>The Environment Act requires that during the preparation of the EIA report the applicant must attempt to consult stakeholders, potentially affected persons, and any other person who would have an immediate interest in the activity and likely to be affected by the proposal. Consultation normally takes place twice during the preparation of an EIA; once to introduce the project and secondly to present draft results. The Principal Environment Officer (PEO), at his/her discretion, can also require additional consultations as part of the first license application decision.</p>	<p>Activities under the project have already been disclosed to the island communities through meetings and two rounds of consultations. The results so far are summarized in Section 10. During the pre-construction phase and as the projects are rolled out there will be further participation and consultation of all affected persons for prepared safeguard instruments as per I-Kiribati requirements and a Stakeholder Engagement Plan (SEP) will be prepared at that time.</p>
<p>Public Disclosure The disclosure of all documents is required under the Bank's safeguards policies.</p>	<p>Public disclosure of documents is prescribed in the Environment Act (2017). Once the ECD has cleared the EIAs as acceptable it is placed in the public record or a summary is distributed for comment. However, the method of disclosure is not prescribed and is at the discretion of the PEO.</p>	<p>Public disclosure of safeguards documents prepared under the project is required.</p>
<p>GRM Appropriate and accessible grievance mechanisms are established for affected persons/communities.</p>	<p>Customary and formal grievance mechanisms are normally managed and approved on a project-by project basis. Under the Constitution, there is provision for appeal to the High Court on issues of land compensation and title. Therefore, grievance mechanisms appear to be limited to constitutional provision for appeal to the High Court on issues of compensation and title.</p>	<p>A three tier Grievance Redress Mechanism (GRM) has been developed and is included in Section 11 of the ESMF to enable issues to be addressed in a transparent and responsive manner.</p>
<p>Vulnerable Groups Under World Bank Safeguards particular attention is paid to the needs of vulnerable groups.</p>	<p>There are no specific provisions for vulnerable people in Kiribati law. However, there are practices that are embedded in the customs and traditions of Kiribati.</p>	<p>Activities will require participation and consultation of vulnerable groups. A Gender Action Plan and Gender Based Violence Framework have been developed as set out in Annex 2.</p>
<p>Land Acquisition and Livelihood Restoration Where physical relocation is necessary displaced persons are provided compensation, transitional</p>	<p>The Native Lands Ordinance and State Acquisition of Lands Ordinance provide for land alienation (native or non-native) and land acquisitions. Consultations are not always required where the land is commercial and government owned and livelihood restoration appear to be limited to financial compensation for land that is legally registered.</p>	<p>Provide compensation to all affected persons at full replacement cost as defined above and under OP4.12. Any Abbreviated Resettlement Action Plan (ARAP) prepared under the project will specify full compensation and measures to enhance or restore livelihoods where necessary.</p>

Safeguard Requirement	Aspect/ Gender Assessment	Proposed Project Measures
assistance and support to enhance or restore livelihoods.		Activities under the project will also require participation and consultation of affected persons for prepared safeguard instruments.
Involuntary Resettlement Involuntary resettlement (and acquisition of land) should be avoided where feasible, or minimized, exploring all viable alternative project designs.	The Native Lands Ordinance and State Acquisition of Lands Ordinance provide for compensation arrangements in the case of involuntary resettlement, provided those resettled are not in default of any current law (i.e. not illegal settlers/). Basic legal provisions addressing involuntary resettlement appear to be limited to financial compensation for land that is legally registered. Furthermore, evidence that alternatives have been considered is also not always required under Kiribati law.	Acquisition of land will only be pursued once all viable alternatives have been considered and no other suitable sites exist. The process and agreements between the Government and the landowner will be based on a RP prepared under the project and approved by the Bank. Activities under the project will require participation and consultation of affected persons for prepared safeguard instruments.
Environmental Instruments Environmental assessment of all project activities is required to ensure they are environmentally and socially sound and sustainable.	The Environment Act 1999 requires that an environmentally significant activity (ESA), as listed in the Schedule of the Environment Act, and the construction work designed to enable an ESA must be carried out in accordance with an environment License. However, there are still some legislative weaknesses allowing exemptions from the Environment Act provisions allowing potentially harmful practices and omitting the specification of important requirements for good practice.	The requirements for safeguard instruments will be based on WB, ADB and GOK requirements. For example, where an EIA is required under Kiribati law, the local procedures will be followed with approval by MELAD; ESIA for the World Bank, and IEE for ADB would be prepared and approved prior to construction based on the principles established in this ESMF.

6 Environmental and Social Screening of Subprojects

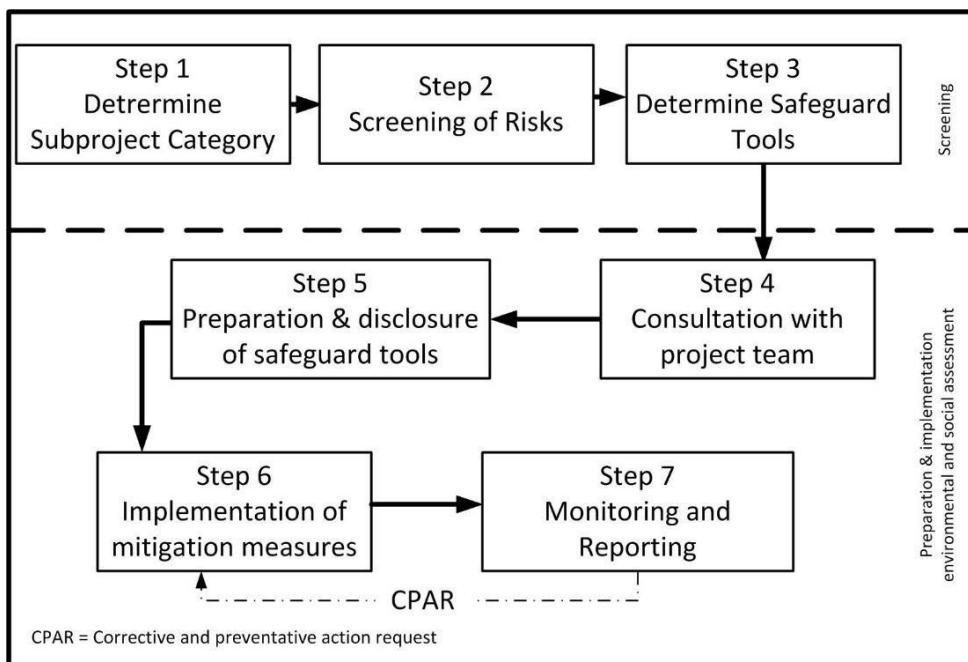
6.1 Overview of Screening Process

The screening process will be used to screen all subproject activities for risks and then identify the safeguard instruments that need to be prepared. The screening process may include completing a screening form, undertaking a site visit, and consulting with stakeholders. Responsibilities for implementing these procedures are outlined in Section 10 of the ESMF. The screening process and checklist should be reviewed after 18 months of project implementation to ensure that the process is appropriate.

6.2 Screening of Subprojects

The following provides the steps in the assessment of subprojects that will be undertaken. The environmental and social screening of subprojects will take place either during the annual work plan or on ad hoc basis as subprojects and activities are defined by the Project Team/s. The screening process (followed by environmental and social assessment and monitoring) will trace the key steps shown in Figure 6.1.

Figure 6.1 – Key Subproject Screening Steps



Step 1 - Determine Subproject Category

The first step of screening is to determine what type of subproject or activity is being proposed and determine the immediate next step. To determine the subproject category, refer to Checklist in Annex 6

Step 2- Screening of Risks

The next step is to complete the subproject screening checklist or refer to the appropriate subproject guidelines, as determined in Step 1. The checklists will determine what safeguard tool/s are required (if any) under World Bank and Kiribati safeguards requirements (e.g. ESMP, EIA).

Step 3 – Determine Safeguards Tool/s

The third step is to determine what safeguards tool/s are required, if any, under World Bank, ADB and Kiribati safeguards requirements (e.g. ESMP, EIA) as a result of the risk screening. The subtype screening forms will assist in determining the safeguard tools need to be prepared.

The remaining steps are part of the environmental and social assessment and monitoring.

Step 4: Consultation with Project Team

If required, the screening outcomes will be discussed with the project team and design personnel to identify ways to reduce or avoid any adverse impacts. Any adjustments to the subproject design, categorization or safeguard instrument can be refined following this process.

Step 5: Preparation and Disclosure of Safeguard Tools

If required, the next step is to prepare the relevant instruments, both for Kiribati and the WB & ADB processes. This process may include site visits and data gathering, consultation, and public disclosure of the documents. Instruments that cover groups of subprojects by geographical area or procurement may be used where appropriate e.g. ESMP plans for small scale infrastructure developments on outer islands.

Step 6: Implementation of Mitigation Measures

The implementation of the safeguards tools and conditions of any environmental and social approvals will need to be implemented, monitored and enforced. For MISE/MICT assets and infrastructure, training of other staff may be needed to ensure that conditions of the safeguard instruments are met. For contractors, monitoring and supervision will be needed to ensure that conditions of the safeguard instruments are met. For outer island developments, training will be needed to ensure that conditions of environmental and social safeguard instruments are met.

Step 7: Monitoring and Reporting

Monitoring is required to gather information to determine the effectiveness of implemented mitigation and management measures and to ensure compliance with the approved safeguard tools. Environmental and social indicators will be defined in the safeguards tools and compliance with these indicators will need to be monitored. Monitoring methods must provide assurance that safeguard measures are undertaken effectively.

Regular reports on environmental indicators and any incidents that may have adversely impacted on the environment and social setting, arising from subproject activities will need to be prepared. These will be included into semi-annual safeguard monitoring reports to the World Bank and ADB. The reports to the banks will include: (i) the status of the implementation of mitigation measures; and (ii) the findings of monitoring programs, (iii) corrective and preventative actions required and compliance.

For purposes of section 24 of the Environmental Act and Item 3 (b) of the requirement for environmental impact assessment report environmentally significant activities (ESA) are listed in the schedule. The ESA likely to be undertaken as part of KOITIIP are shown in Table 6.1

6.3 Ineligible Activities

Activities will be deemed ineligible for project funding if they:

1. Are not aligned to the objectives of the project.
2. Are large-scale infrastructure projects, or studies that will lead to large-scale infrastructure projects that would trigger Category A under World Bank Policy OP4.01.
3. Involve the conversion, clearance or degradation of critical natural habitats forests, environmentally sensitive areas, significant biodiversity and/or protected conservation zones.
4. Will cause, or have the potential to result in, permanent and/or significantly damage non-replicable cultural property, irreplaceable cultural relics, historical buildings and/or archaeological sites.
5. Will result in involuntary land acquisition or physical displacement of affected communities.
6. Require or involve:
 - Political campaign materials or donations in any form;
 - Weapons including, but not limited to, guns and ammunition (e.g. for maritime police or fisheries surveillance);
 - Purchase, application or storage of pesticides or hazardous materials (e.g. asbestos);
 -
 - Any activity on land or coastal areas that has disputed ownership (private, communal or customary).
 - Trade in wildlife or wildlife products regulated under CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora);
 - Fishing in the marine environment using electric shocks and explosive materials;
 - Production or activities involving harmful or exploitative forms of forced labor / harmful child labor.

Table 6.1 Environmentally significant activities (ESA) likely to be undertaken as part of KOITIIP.

	SCHEDULE SECTION		COMMENT
	SIGNIFICANT COASTAL AND MARINE IMPACT		
1	EXTRACTION OF AGGREGATES, STONE, SHINGLE, SAND REEF MUD AND BEACH ROCK		
(ii)	For construction work		Needed for construction
(iii)	>200kg per year		Needed for causeways
2	CLEARANCE OF LIVE CORAL, MANGROVES & SEAGRASS	Unlikely	Isolated specimens of mangrove <i>Rhizophora</i> near some causeways Possible can be avoided.
(ii)	Needed for construction or development work	Possible	To be confirmed depending on detailed design
3	CONSTRUCTION WORK BELOW HIGH WATERMARK		
4	Construction of seawalls	Possible	To be confirmed depending on detailed design
5	Land reclamation	Unlikely	
6	Construction of causeways	Yes	Repairs only
7	Establishment of boat channel	Yes	Widening only
8	Dredging	Yes	Maintenance dredging
	SIGNIFICANT WASTE PRODUCTS		
1 to 18	NO ESA in KOITIIP	N/A	
	USING SIGNIFICANT NATURAL RESOURCES		
1 to 4	NO ESA in KOITIIP	N/A	
	INVOLVING HARMFUL CHEMICALS		
	NO ESA in KOITIIP	N/A	
	SIGNIFICANT ALTERATION OF THE ENVIRONMENT		
1	NO ESA in KOITIIP	N/A	
	OTHER ENVIRONMENTALLY SIGNIFICANT PROJECTS		
1 to 16	NO ESA in KOITIIP	N/A	
	See Annex10 for full schedule		

Source: Environmental Act (General Regulations) 2017

7 Potential Environmental and Social Impacts and Measures to Mitigate

7.1 Environmental Impacts and Mitigation

The project will result in positive impacts including improved marine safety through the completion of hydrographic surveying and marine charting and the installation/ rehabilitation of navigational aids as well as the positive social impacts associated with improved inter-island connectivity.

Project typologies that have been identified as requiring environmental and social screening and management during implementation include small scale infrastructure development on outer islands; and installation of aids to navigation. The impacts of these activities can be readily mitigated through standard mitigation measures, if they are screened and managed properly.

The potential environmental and social impacts of the Project for causeway improvements are likely to be broadly similar in scale and scope for each of the islands. Maritime projects will be broadly similar in scope but the scale may differ with regards to the necessary dredging, which can only be determined after the hydrological studies in years 1 and 2. Environmental and social analysis during due diligence and project preparation has focused on the conceptual designs and covered potential indirect, cumulative, and induced impacts but primarily focusing on the direct impacts of the proposed works within the subproject areas on four islands.

Widening the causeway embankment base to create a 1:1 edge batter as well as installing new box culverts on the Beru causeways, have the potential to cause localized changes to coastal processes. These include changes to sediment erosion and deposition patterns surrounding the causeways as well as changes to tidal flows through the new culverts. These potential changes to coastal processes and any impacts on intertidal benthic communities will be assessed within the relevant ESIA/ESMP, and appropriate mitigation measures identified and implemented.

Based on current information it is anticipated that all the subproject activities will be Category B for environment and resettlement and there are no indigenous peoples as defined by ADB and World Bank policies. Environmental impacts will mostly occur during the construction phase and will be manageable through mitigation. Many of the impacts such as health and safety hazards to workers and the public, elevated dust and noise levels, stockpiling of materials, waste disposal and water quality impacts are typical of small scale work arising during the construction and will be very manageable and may require typical mitigation measures.

Any vessels used for mobilization to the outer islands or for on-water work associated with KOITIIP (e.g. dredging, surveying, aids to navigation installation), is to be in a condition of current survey as required by the national Safety Regulator (MICT) for a vessel of its size and area of operation. The vessel shall be suitably equipped with safety and communications equipment, and operated by qualified crew. Non-crew personnel on such vessels also have individual responsibilities for safety, and should follow the guidelines in the Marine/Sea Safety Guidelines and Standard Operating Procedures for United Nations Pacific Islands (United Nations – Standard Operating Procedures 080716 – April 2019)

The expected necessary mitigation measures (based on professional judgement) have been included in a generic EMP in this ESMF. The generic EMP will inform the more detailed assessments that will be made for the IEEs/ESIAs and associated detailed EMPs that are prepared in years 1 & 2 before construction. Those detailed EMPs will be incorporated into the bid and contract documents. The site-specific Contractor's EMP (CESMP), will be prepared by the contractors for specific subprojects and in

respect of the proposed construction methodology. The CESMPs, will aim to control impacts such as dredging, stockpiling of materials, causeway repairs and improvements, installation of gabions and enhancement planting for erosion control. With implementation of the EMP and SEMP the residual impacts should be minor as the impacts will be mostly manageable and/or reversible. A generic EMP to address predicted negative environmental impacts is included as Appendix C and items to be covered in the SEMP (in addition to updating the EMP) are in Appendix D.

7.1.1 Physical Impacts.

The main physical issues relate to impacts such as excavation of construction materials for upgrading and improvement works, reuse of cut materials from dredging, minor disturbance of seabed and small landward areas to locate and fix navigational aids, routine construction impacts such as dust and noise and community disturbance, workers and public safety, temporary traffic arrangements, and hazardous and general waste disposal. The construction will create some minor additional unavoidable dust and noise in addition to the main civil works and all the above require to be addressed. Contractor mobilisation, presence of construction workers, establishment of camp and interactions with local people are all possible but at this stage it is not likely that contractor camps will be needed but at least set down areas will be required in some places and mitigation measures are therefore needed to cover this eventuality.

Based on the project ESMF the Borrower will prepare the set of detailed EHS requirements for contractors that will be reviewed and approved by the Bank. Method statements shall be included in the Contractor's ESMP based on the generic ESMP in the IEE and the CESMP shall be prepared by the Contractor in the preconstruction stage for approval and endorsement by OIIU and implementation by the Contractor. The following plans or method statements are likely to will be required: (i) Water supply for works, workers and water conservation measures; (ii) Waste Disposal (covering spoil disposal, general waste and hazardous waste); (iii) Clearances for legitimate suppliers of construction materials and management thereof; (iv) Dredging plan (if required for maritime works); (v) Groundwater contamination prevention; (vi) Dust and noise minimization; (vii) Construction camp or set down area operations, sanitation and diseases; (viii) Power provision & utilities protection; (ix) Safety precautions - workers and public; (x) Accidental discovery of archaeological assets, holy sites or resources; (xi) Rehabilitation, revegetation and re-contouring of construction areas to facilitate safety and erosion control; (xii) Enhancement planting for surface stabilization; and (xiv) abstraction agreements for water resources that may be permitted after prior approval from OIIU in consultation with local suco leaders and local authorities.

The GEMP provided in Annex 4 will cover foreseeable negative environmental impacts. However, assessment and review of impacts of proposed works on any subprojects should take place during detailed design stage.

7.1.2 Dredging

According to the concept design report for maritime improvements Dredging has only been considered as feasible at Tebikerike (north Beru, Annex 1) but not viable on the other islands due to presence of long sand / reef flats and lagoons. The quantity of dredging required is likely to be small scale. The actual dredge volume is to be confirmed during detailed design phase. One option would be to include a turning basin at the end of the approach channel and a circular turning basin has been shown in concept. However other options such as swing / pivot type basin should be considered in the detailed designs as this would require less material to be dredged.

Whatever options are investigated during implementation, screening will be undertaken for all

components (site conditions and activities) so the correct level of due diligence is undertaken. Investments identified as including Category A activities will be excluded from the project scope. Confirmation of conditions through marine ecological surveys and establishing baseline water quality will need to be undertaken as part of the next phase for dredging options. An analysis of coastal process is required and baseline/modeling and sediment plume analysis undertaken as part of the due diligence. The results of sediment plume analysis can then be used to develop a framework dredging plan in the environmental assessment that will be further developed by the contractor based on their approach and methodology. A Borrower's dredging management plan (DMP) will be prepared in line with Good International Industry Practice (GIIP). The dredging management plan may propose mechanical excavation at low tide with proposal to stockpile and reuse excavated material. Alternatively clam-shell type dredging may be proposed with identification of a disposal site for dredged material at the sea; or a combination of both. In either case raw (excavated or dredged) materials may be provided for processing and distribution to communities. In the case of disposal at sea the location shall be one for which the initial hydrological studies have been prepared and baseline water quality established. In either case of disposal at sea or stockpiling on land the site should also be covered by ecological surveys. The dredging plan can stipulate the volume of material to be dredged per day and at what stage in the tide cycle to reduce turbidity and should also follow any conditions of the Environmental License approval from MELAD.

7.1.3 Ecological Impacts.

The main ecological impacts related to causeway improvements would be from minor removal of wayside vegetation and any removal of trees; however, this is considered unlikely or at most very minor and limited to a few coconut trees according to the resettlement analysis. Given the presence of important habitats such as mangroves and seagrasses in some of the causeway areas, potential impacts from the construction activity run-off must be carefully mitigated or avoided. Any holy trees such as near Teteirio Causeway (south Beru) would be avoided by informing contractors, segregating and marking off in the pre-construction stage. Protection of this spiritual site must be respected by the Contractor. Procurement processes must include disclosure of the importance of this site. Depending on the locations for supplies of construction materials there may be some need to remove vegetation to excavate construction materials. The exact volumes are not known but the engineering analysis indicated that a large proportion of excavated material would be able to be returned to borrow pits after processing, presenting the opportunity for gradual revegetation in the long run. Access is likely to be from the landward side of beaches or in the hinterland but the species there are common as are the species near the causeways. Based on the scale of work proposed no large scale clearance is expected.

No sub-projects are proposed where causeways or maritime infrastructure would traverse areas that are or already ratified for protection and it is not likely any other locations on the subject islands would be so sensitive.

Any effects on aquatic fauna and flora during dredging works and works in and adjacent to causeways or installation of maritime infrastructure would be relatively small scale and impacts should be minimal. It is unlikely there will be any impacts due to interference with protected sites or areas of high biodiversity, However, mangroves and seagrasses growing adjacent to the causeways are likely to be affected, but these impacts will be carefully mitigated. The subprojects will need to be checked at the detailed design stage and confirmation of conditions through marine ecological surveys and to ensure that a list of environmental and social negative attributes is presented in Annex 5. However, it is very unlikely that for unexpected reasons any subprojects would overlap with protected areas or new areas declared in the meantime. If they do ADB and WB and MELAD will be informed and the appropriate level

of assessment required will be determined or activity eliminated.

7.1.4 Social Impacts.

The social and human impacts to subproject road corridor activities and impacts to social infrastructure will be mitigated through implementation of the Resettlement Plan and measures proposed in the social development plan in the poverty and social assessments. A list of negative attributes presented in Annex 5 includes social aspects.

The project is not expected to have severe involuntary resettlement impacts (IR). Government land has been identified for most marine facilities and where government land was not available, private native land has been proposed. These sites will require new lease agreements but are not inhabited. Voluntary lease agreement with the landowners will be sought in the pre-construction stage. Compensation for a very few coconut trees is anticipated and an Island Council owned bush toilet may need to be relocated for construction of the marine facilities.

All causeway works will take place on government land. No relocation of housing or settlements will be required. Compensation for loss of 1 fishpond is may be required and possibly a very few coconut trees may need to be removed and compensated (both subject to detailed design). Temporary land use for batching plant and extraction of construction materials and contractor facilities will need to be determined once the Civil Works Contractor is involved. The Resettlement Plan will need to be updated at the pre-construction stage to reflect the details of entitlements.

All necessary land acquisition will be based on meaningful consultations with landowners and other affected persons (APs). Land acquired will be appropriately compensated based on current market value. The Resettlement Plan sets out the consultation processes, laws, and mechanisms for calculating market value and replacement costs for land and other assets.

The table in Annex 4 provides a preliminary analysis of the type of project activities identified, potential social and environmental impacts that may result from the project activities, and monitoring.

The beneficial social impact of the Project is to increase access to better quality infrastructure in rural areas including shipping and ship to shore access and improved causeways that link roads between the islets. Key project outcomes include safe and resilient inter-island navigation and connectivity and improved ship to shore transfers. For the target islands of Abaiang, Nonouti, Beru and Tabiteuea South, this is meant to reduce the number of maritime safety incidents and result in more regular domestic vessel service to/from the islands and Tarawa. The ability to move people and cargo safely aboard ship and between the outer islands and the capital may create investment opportunities in tourism and improve the supply chain for coconut products and fisheries and craft products.

Most of the outer islands are experiencing a decline in population with Beru recording a 0.7% population decline from 2010 (pop. 2,099) to 2015 (pop. 2,051). Similarly Nonouti experienced a significant drop in population from 2000 (pop. 3,176) to 2015 (pop. 2,743), where 40% of the population is under 15 years and the largest age group is 0 to 5 years of age. The population in Abaiang in 2015 was estimated at 5,568. Tabiteuea South has a more stable population, measuring 1,290 persons in 2010 and 1,306 in 2015. Potential stimulus to the economy and service provision brought about by improved outer island access may result in a decrease in urban drift and less deterioration of outer island populations.

7.2 Exposure of Project Infrastructure to Climate Risks and Impacts

The analysis of vulnerability of project infrastructure to climate hazards in the CRVA was focused on the exposure and sensitivity of the Subprojects and the changes in climate variables expected including: (i)

changes in temperature and heat waves; (ii) changes in rainfall; (iii) extreme rainfall events; (iv) sea level rise, extreme tides, cyclones and storm surge; (v) changes in wind and wave

climate; (vi) changes in coastal processes: and (vii) Changes in oceanic conditions: temperatures, ocean acidification and coastal processes.

7.2.1 Climate Vulnerability Analysis

The analysis of vulnerability focused on the ‘exposure’ and ‘sensitivity’ of the proposed maritime and road transport infrastructure related to location and climate hazards. The aim was to describe the ‘climate induced vulnerability context’ for the infrastructure based on (i) exposure of the asset or infrastructure’ to climate to threats and hazards; (ii) the relative ‘sensitivity of the asset or infrastructure’ to the impact of the hazard; and (iii) the ability or capacity to adapt to climate change impacts.

Climate change vulnerability is a function of the asset’s exposure, sensitivity and capacity to adapt to projected changes in temperature, rainfall, sea level and other climatic variables. The combination of exposure and sensitivity determines the potential impact of climate change on the asset. The combination of potential impact and adaptive capacity determines the asset’s vulnerability. The transport infrastructure proposed under this project will be designed to accommodate more complex, harsher climatic conditions to cope with the future conditions.

7.2.2 Potential Adaptation Options & Measures

The CRVA has identified a limited range of potential hazard risk mitigation and adaptation response measures for climate proofing infrastructure proposed under this project due to geophysical challenges (size and elevation of the subject island) climate change and sea level rises. There are measures included in the preliminary feasibility studies and additional activities that may be implemented specifically for climate change adaptation, and include the following:

- **Infrastructure design and construction standards:** Accommodate the effects of changing flood levels and behavior due to climate change in the design process through application of appropriate international standards and guidelines. Where necessary incorporate more resilient/robust design specifications and construction standards in areas potentially susceptible to extreme coastal hazard risks that may result from the impact of climate change- exacerbated hazards during a minimum design life of 50 years.
- **Placement, design and realignment of infrastructure assets.** Planned relocation of transport infrastructure from highly vulnerable coastal locations to low risk areas. Update design, siting and operational planning for extreme events (coastal flooding, inundation and erosion), and including the identification of alternative road alignments to avoid flood prone areas or coastal hazard zones. Relocation of transport infrastructure to locations that minimize transport system vulnerabilities to possible climate impacts and threats.
- **Materials selection.** Identify and select suitable materials for construction of infrastructure assets and structures to minimize damage and/or deterioration of transport infrastructure as a result of sea level rise, coastal inundation and saline intrusion and other climate change impacts.
- **Coastal defense:** Coastal defense mechanisms such as gabions, groynes, sea walls, levies and coastal drainage systems to provide protection for coastal flooding and erosion risk management due to storm tides and sea level rise.

- **Protection of coastal habitats:** Employ non-structural risk reduction and adaptation measures, such as bioengineering and mangrove planting for protection against SLR, coastal flooding and storm surge and to preserve / protect infrastructure.
- **Risk communication on climate change.** Communication of climate change risks to decision-makers and wider community (flooding, storm surge, heatwave and sea level rise) improved through the adoption of a programs such as Coastcare – which builds the capacity of local community groups through improved about climate change knowledge.

7.3 Gender Impacts and Mitigation

7.3.1 Gender Inequality in Kiribati

Gender inequality poses a significant impediment to sustainable development in Kiribati. GOK development plans conclude gender discrimination is culturally entrenched and will take time to rectify. Women are underrepresented in most walks of life outside the home (6.5% parliament, 33% in the labour force). Formal businesses are majority owned and controlled by men (57%) and economic opportunities are concentrated in Tarawa. Only 70% of girls aged 12-18 attend secondary school and 4% of women >24years old have post-secondary qualifications Females start their families early and by 18 years old, 20% of girls are married. Women engage mostly in home-based including, care work, subsistence agriculture, marketing agricultural products, and trading. Gender Based Violence (GBV) rates in Kiribati are more than twice the global average; 68% of married women aged 15-49 having been subject to some form of violence.

7.3.2 Limited access to services and economic opportunities for outer islands Women.

The day to day lives of outer island women are further comprised by geographic remoteness, lack of economic opportunities and absence of essential services. Discriminatory gendered attitudes and norms limit women’s mobility, decision making increasing their vulnerability to GBV. Outer island women must depend on unreliable boat transfers and irregular domestic flights to attend secondary education, health care, banking, employment and economic opportunities.

GOK employment opportunities and posts (council clerks, teachers, nurses, police and assistant social welfare, water and agriculture officers) are filled by government employees from the capital. Thus economic activities for women on outer islands are trading handicrafts, copra and fresh food including fish. On the four KOITIIP islands there are 31 businesses registered as women owned (Abaiang 14, Beru 3, Nonouti 2 and Tab. South 12), however, almost all other women are involved in informal trading.

7.3.3 Unreliable boat travel is considered unsafe for women and families

Most trading requires transportation of goods by boat, typically to Tarawa but also between other islands. Consultations indicate manifests comprise at least half women passengers. Unreliable boats, unpredictable schedules and limitations to mooring at high tide mean that it is difficult to for women to expand trading opportunities or depend on income generated from trading, reliant on sea transport; especially from fresh food and copra. Mooring boats offshore (sometimes several kilometers from shore) means passengers must walk across long beaches, cross reefs or take shuttles to reach boats and absence of ramps means women are unable to shift cargo, especially copra and fuel, without assistance. It is common that passengers wade through water to board boats. This is not possible for all passengers, especially the elderly, women with small children and disabled people thus further limiting their mobility and access to essential services available in South Tarawa.

7.3.4 Barriers to women working in non-traditional sectors.

In Tarawa, there is an observable trend towards women studying and working in non-traditional sectors, such as engineering, plumbing, carpentry, construction and maritime related professions. Female graduates are finding work with the Public Utilities Board and on development projects, such as the construction of roads and water supply. In outer islands, women are unable to access work experience to support applications for further study or employment in South Tarawa or abroad. High competition for employment opportunities and discriminatory attitudes towards women indicate it is unlikely that women in outer islands will be selected for day labour positions on KOITIIP although such work experience would underpin future employment opportunities and improve access to vocational education in South Tarawa. Poor Additional advocacy is needed to promote women's employment because women are poorly represented in local councils (7/287) and few women in outer islands work in male-dominated sectors (such as police).

Research and consultations in outer islands point to other barriers facing women moving into non-traditional areas of work. In outer islands men claim that women speaking with or working with unfamiliar men is likely to cause jealousy and could contribute to increasing the risk of violence against women. Active promotion of women's participation in KOITIIP must focus on garnering men's support for women's employment and testing strategies to minimize risks to women. Additional mechanisms need to be put in place to prevent GBV and respond appropriately. Strategies include community consultation, trialing all-female work crews for some tasks and employing staff from a pool of qualified female graduates.

7.3.5 GoK SafeNet for GBV and operationalization in outer islands.

Availability of alcohol, high unemployment, overcrowding and high living cost drive high levels of gender based violence in South Tarawa. However, a lack of reporting in outer islands due to the GBV stigma and less progressive gender attitudes suggests high GBC may also be present but hidden. Abaiang police indicated call outs were predominantly for domestic violence involving alcohol. Assistant Social Welfare Officer (ASWO) in Abaiang reported handling 40 cases by August in 2019 whereas in Tab. South the ASWO and police did not report any GBV cases in 12 months.

The GOK (Ministry of Health, Ministry of Women Youth Social Affairs and Sport (MWYSSA) and the Ministry of Internal Affairs) has established a national SafeNet referral system with support from World Bank, UN Women and Government of Australia. Free Help Line 191 can be accessed from all outer islands connecting to counselling and reporting in South Tarawa. The SafeNet is designed to link health, police and social welfare services, however this has not been rolled out nationally. Abaiang has a SafeNet committee and ASWO officers providing basic counselling, awareness and prevention advice and evacuation. Beru, Tab South and Nonouti have ASWOs in place, but coordinated services are lacking. SafeNet is designed to refer serious GBV cases to South Tarawa, and facilitate evacuation of survivors because legal and medical service are lacking in outer islands.

7.3.6 Implementing agencies lack gender experience for infrastructure projects.

MWYSSA is mandated to mainstream gender across the GOK. At present there are no gender focal points in any GOK Ministries and Ministries are not required to report on their gender work. MWYSSA has no experience working on gender in infrastructure or construction. Lead KOITIIP stakeholder ministries (Ministry of Infrastructure and Sustainable Energy (MISE) and the Marine Division of the Ministry of Information, Communications, Transport and Tourism Development (MICT)) have 33 and 25 percent female staff (respectively) and while most of these are working in administrative positions, there are female engineers, inspectors and supervisors. Consultations highlight that women working in

the implementing agencies face challenges working in a male-dominated sector including inappropriate comments and sexual jokes; women feeling unsafe to participate in certain work-related travel when alone or with male colleagues; and limited knowledge of, and access to, support networks and services. The Kiribati Occupational Health Safety and Welfare Act (2015), Ministry of Labour Access and Equality Plan (2010) and the Convention on the Elimination of All forms of Discrimination Against Women (CEDAW) to which Kiribati is a signatory all promote safe workplaces in Kiribati. However, these laws and policies have not been operationalised within the stakeholder ministries. Further capacity development is necessary in the stakeholder ministries to better understand and mitigate gender related risks and provide a safe working environment for women.

KOITIIP has been classified as Effective Gender Mainstreaming (EMG) by the Asian Development Bank. The World Bank has assessed the GBV Risk of KOITIIP as moderate. The Gender Action Plan, GBV Framework, Grievance Redress Mechanism and draft Code of Practice are presented in Annex III. The key features of the Gender Action Plan

7.3.7 Proposed Gender Action Plan

1. Improve women’s access to services and economic opportunities in outer islands.
2. Promote safe employment and professional development opportunities for women working in transport sector.
3. Build the institutional capacity within the stakeholder ministries on effective gender mainstreaming strategies and operationalize GOK commitments on gender-based violence and safe workplaces.

The Project was screened using the World Bank’s ‘GBV Risk Assessment Tool’ and was classified within the “Moderate Risk” category. Taking into account the Moderate Risk category and the high underlying rates of GBV and VAC in PICs, KOITIIP will develop a strategy and undertake a number of activities to address GBV, in line with the World Bank GBV Good Practice Note. The strategy will be developed in consultation with relevant government and civil society stakeholders. Such actions may include: (i) identifying GBV prevention and response actors; (ii) informing those affected by the project of the GBV risks as part of stakeholder consultations; (iii) clearly defining the GBV requirements and expectations in the bid documents; and, (iv) implementing codes of conduct. An indicator will be included within the Results Framework to monitor GBV and VAC in monitoring the outcomes from the proposed actions.

7.4 Cumulative Impacts

Overall the proposed development’s value and feasibility are not limited by any cumulative social and environmental effects. The project objective to improve the safety and transport connectivity and in emergency, provide a response that together should accumulate beneficial impacts in the form of improved access and especially if the programme can be extended to other islands in the future.

There are so far no known small-scale development projects near any of the sub-projects that could give rise to direct cumulative impacts near the works. Even if other projects are undertaken nearby it seems likely they would be moderate to small on a village scale and none or only minor accumulation of impacts would result, they would be largely reversible and residual impacts would be acceptable. Whereas there will likely be some other projects targeted at the outer islands in the near future the cumulative impacts can be assessed in the ESIA’s at the detailed design stage when they are known.

Cumulative environmental impacts from KOITIIP and other developments are not likely to cause any unacceptable impacts on the natural environment and impacts from KOITIIP can be controlled using the ESMP. Likewise the social workstream has not identified any significant cumulative social impacts

and direct impacts can be controlled through the measures in the safeguard frameworks and there are unlikely to be any cumulative environmental or social impacts that might exceed a threshold that could compromise the sustainability or viability of the selected subprojects.

No concerns have arisen so far in the affected communities about the cumulative impacts of at the proposed locations and other concerns have been identified, documented, and addressed.

8 Institutional Arrangements and Responsibilities

8.1 Main Institutions Involved

The main institutions involved in outer islands infrastructure are the Ministry Finance and Economic Development (MFED) of Infrastructure and Sustainable Energy (MISE), the Ministry of Communications Transport and Tourism Development (MICT). The Ministry of Internal Affairs (MIA), and the island councils run the day-to-day governance on the islands. Coordination between the various institutions is not done well.

MISE is responsible for basic infrastructure development and maintenance to support transport, coastal protection and water conservation initiatives among others, and the island councils through the MIA are responsible for routine maintenance of the roads. In practice, no routine maintenance occurs as sufficient procedures including financing and island-based staffing have not been established. In recent years the MISE has graded and compacted a number of island networks and is currently tasked to upgrade all roads and airfields to a paved surface through the Government of Kiribati funded Outer Islands Roads and Airfields Upgrading Project that is under preparation.

MICT performs the functions of the maritime administration of Kiribati, and looks over the services to shipping, navigational infrastructure, administration and regulation of civil aviation, highway authority, and promotion of tourism. The MIA is concerned with outer islands development and with services to outer islands. It is responsible for variety of matter including local government, support services to island councils, decentralization rural development for all islands except the Line and Phoenix Islands, the electoral commission and national elections, community development, cultural affairs, village banks, and the outer islands development program.

Kiribati Fiduciary Services Unit (KFSU)

KFSU has been established in the MFED. This unit will house the safeguards specialists which will include safeguards specialists for other projects (e.g. one international and three local safeguards specialists for PROP) who will provide fulltime safeguards support. The Safeguards Officers in the KFSU will have the overall responsibility for general oversight of environmental and social issues are adequately addressed within the project.

Outer Islands Implementation Unit (OIIU)

OIIU will be established to house the project management and safeguards specialists exclusive to the KOITIIP who will cover maritime and causeway projects for both MISE and MICT (e.g. one international environment, social and gender specialist (intermittent) and four national safeguards specialists (one environment, one social, one gender/ GBV specialist and a community liaison officer) who will provide fulltime safeguards support. The Safeguards Officers in the OIIU will have the day today responsibility for ensuring that environmental and social management issues are adequately addressed within the project.

The Outer Island Implementation Unit (OIIU) will include a new project support team dedicated to the KOITIIP project (which will be housed under the KFSU). It is envisaged that the OIIU would also rely on the existing Kiribati Fiduciary Support Unit (KFSU) for procurement and financial management support. Moreover, the formation of the OIIU will: (i) draw on the lessons learned from other GOK projects; (ii) be designed so that it can implement GOK, World Bank and ADB activities, as well as any other donors who may wish to also participate in outer islands investment in the future.

8.2 Key Safeguards Responsibilities

The environmental and social management structure and activities that will be undertaken as part of overall project implementation, roles and responsibilities of various agencies in undertaking these activities are defined in Figure 8.1. The institutional strengthening activities that will be required to allow those organizations to fulfil their nominated roles and responsibilities are identified. An indicative environmental monitoring program has been prepared (Annex 4) and the cost associated with its implementation will be identified during ESMP development.

The OIIU will be responsible for monitoring of the project construction activities; assisted by environmental and social specialist consultants on a day to day basis. OIIU will carry out regular monthly inspections of construction activities and monitoring of mitigation measures. Together this will provide an efficient use of the environmental monitoring resources available to the project.

The Environment and Social Safeguards Officers (Safeguards Officers) will be one intermittent international and four full-time national positions located in the OIIU / KFSU. These positions will ensure the implementation, monitoring, review, and update of the Environmental and Social Management Framework (ESMF), and any other instruments prepared under the ESMF such as Environmental and Social Management Plans (ESMPs). These positions will be responsible for ensuring that project safeguards comply with the Financing Agreement, Kiribati's laws, and the World Bank's and ADB's Safeguard Policies, and for implementing the GRM.

Specifically, the Safeguards Officer's will need to undertake:

- i. Contribution to the development of the project's annual planning processes;
- ii. Contribution to project documents (including tenders, bids, Terms of References, and contracts) to ensure they have requisite safeguard documentation applied and attached as required;
- iii. Screening of subproject activities for environmental and social risks;
- iv. Preparation of safeguard instruments such as ESMPs;
- v. Stakeholder consultation on draft safeguard instruments;
- vi. Update of safeguard instruments to reflect stakeholder input;
- vii. Public disclosure of final safeguards instruments;
- viii. Implementing and documenting the implementation of safeguard measures;
- ix. Monitoring and enforcement of safeguards compliance;
- x. Monitoring and Evaluation Reports for both safeguards work and stakeholder engagement work;
- xi. Grievance redress management; and
- xii. Updates to the ESMF, as required.

The Safeguards Officer will also ensure project staff receive appropriate safeguards and stakeholder engagement training and capacity building. For example, other fisheries officers may need to be trained to be able to liaise if stakeholder consultation meetings need to be conducted in outer islands.

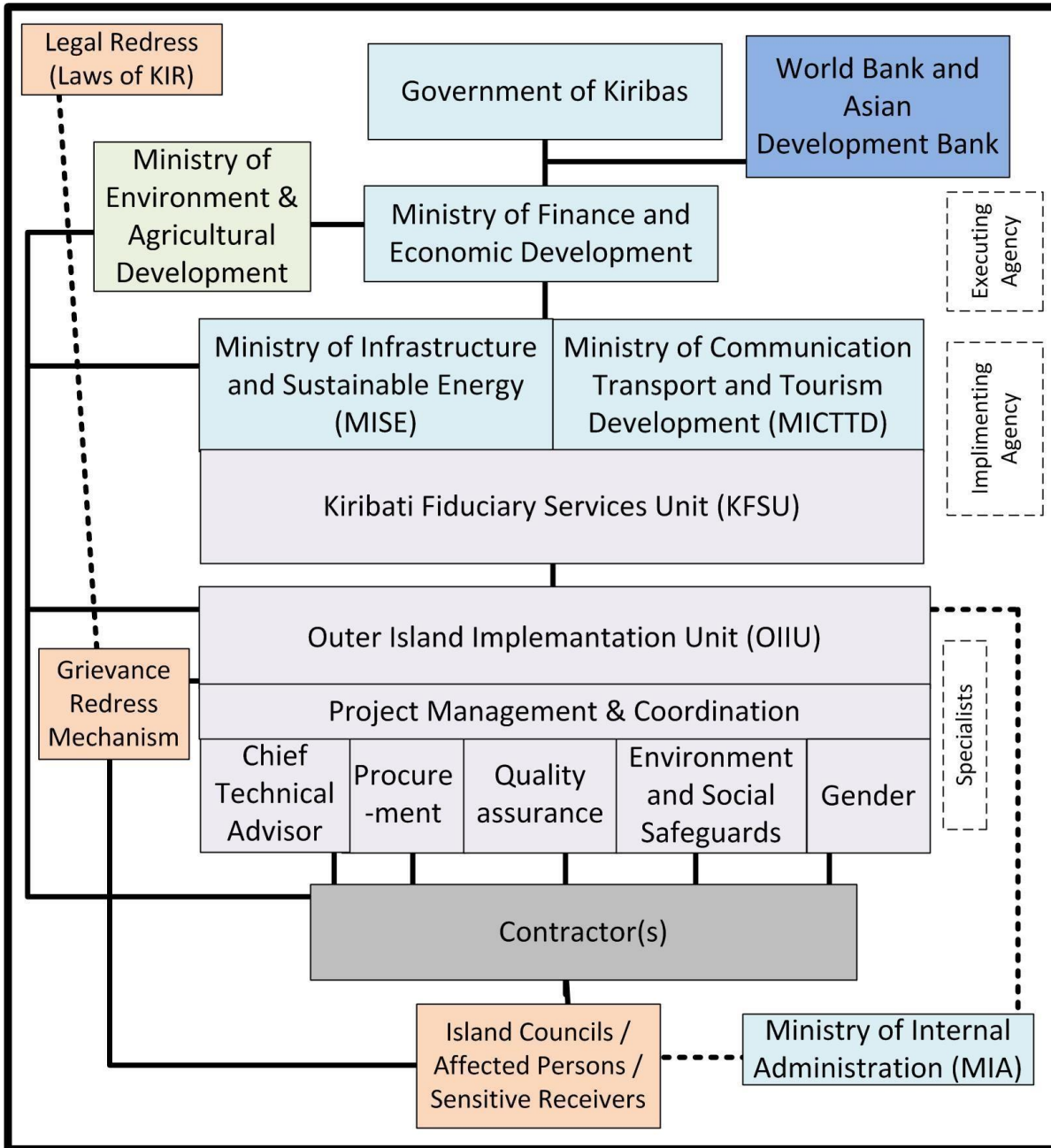
The draft terms of reference for the Safeguards Officer position are attached as Annex 7.

World Bank and ADB Safeguards Specialists

The Bank's Safeguard team will provide regular safeguards compliance support remote and during missions to Kiribati, and to build capacity for ESMF implementation and stakeholder engagement.

The overall organizational structure for environmental management for the project is shown in Figure 8.1. Roles and responsibilities are shown in Table 8.1.

Figure 8.1 - Organizational Structure for Environmental and Social Management



8.3 Capacity Building

A capacity assessment of the MISE and MICT for application of environmental and social safeguards in development partner assisted projects was carried out. Environmental and social management for earlier donor assisted projects has been with the support of consultants. MISE and MICT have no direct experience in preparation of environmental assessment documents and the experience of the conformance to the MELAD requirements has been limited to a few projects as MELAD is still developing as the regulatory agency. MISE and MICT's current approach to tackling environmental issues is on a project level basis and varies with the requirements of the funding agency.

The environmental assessment process is established in Kiribati, but environmental awareness and capability for implementation of ESMP in infrastructure projects of both the executing agency (MOF) and the implementation agencies (MISE and MICT) are still developing. MISE does have some experience with ADB and WB jointly for the South Tarawa Water Supply Project and the Road Rehabilitation Project. Other earlier ADB, WB and JICA investments having been implemented by other ministries, that have been restructured such as Ministry of Public Works and Utilities (MPWU).

However, the need to institutionalize environmental assessments in the design and implementation of infrastructure projects has been identified and close cooperation with the MELAD is anticipated. If this need is supported and applied infrastructure there is a basis for environmental management of infrastructure projects in the medium term. However, consultations with MISE and MICT agencies indicate that there will not be a permanent structure or division to handle environmental concerns or issues in project planning and implementation during the term of this Project.

Therefore, the most significant challenge for environmental and social management on this Project is the lack of human and financial resources and necessary infrastructure in MISE and MICT as the line agencies for implementation. The institutional capacity in terms of environment and social, currently existing is largely that of any staff who participated with the implementation of earlier development partner funded projects. Training and orientation programs on environmental and social aspects have been largely through the capacity building initiatives taken up as part of projects, and these have been mostly one at a time and have been limited to awareness workshops. Training events are not disseminated to wider audiences and there seems to be poor institutional memory and information retention of training so far.

National minimum environmental standards have not yet been declared but guidelines already exist and need to be applied. However, the current capacities of MISE and MICT to address the environmental and social issues at headquarters and island offices are insufficient and need to be augmented; at present there are no staff with direct responsibility for addressing environmental and social issues. The current practice in MISE and MICT is that engineering officers may be delegated to check environmental matters on an ad hoc basis but for day to day environmental and social management of projects is undertaken by the supporting consultants. There is no in-house capacity in MISE and MICT to check the adequacy of the subproject ESMPs or that they are being implemented effectively by a contractor. In the long term it is recommended that dedicated safeguards posts responsible for environmental and social management be set up to improve capacity in the ministries responsible for implementation of infrastructure projects such as MISE and MICT. In the meantime for this project environmental and social management staff will be retained in OIIU to be trained and supported intermittently by international safeguard specialists.

The proposed capacity building will include (a) awareness training of the MISE and MICT (including management) and contractors on environmental and social management as per GOK, WB and ADB requirements; (b) capacity building programs to improve the capability of staff with environment and responsibilities at all levels in carrying out monitoring and implementing environmental and social management measures; and (c) capacity building programs on environmental and social issues including pollution control, guidance on obtaining environmental licenses, social, land acquisition and resettlement and gender related issues. The training programs will be conducted in Tarawa and with Island Councils and local representatives as agreed with MISE and MICT. MELAD can also be invited to participate as required.

Contractor training workshops should be conducted periodically and a contractor focal point established as every new contractor is engaged during the first year and a half and every six months for the remaining years, to share experience in the implementation of the works and the monitoring report on the implementation of the ESMPs, to share lessons learned in the implementation and to decide on remedial actions, if unexpected environmental or social impacts occur. In the medium to long term as the environmental and social responsibilities of MISE and MICT develop, staff posts with specific responsibilities in environmental and social will be trained and developed with the aim of taking over the role currently undertaken by consultants and specialists.

9 Grievance Redress Mechanism

The project grievance redress mechanism (GRM) procedures are included form part of the environmental management plan and will be established to help resolve issues associated with the Project. The GRM will receive, evaluate and facilitate the resolution of affected people’s concerns, complaints and grievances about the environmental and social performance and gender issues including gender based violence (Annex 3). Resolution of these issues and concerns will be undertaken expeditiously and according to the procedures of the GRM. The complaints/issues registry maintained at the site OIIU project office and by the contractors and will be subject to monitoring. The GRM will aim to provide an accessible, time-bound and transparent mechanism for the affected persons to voice and resolve social and environmental concerns linked to the Project.

9.1 Need for Grievance Redress Mechanism

The need to deal with complaints and grievances during project implementation and MISE and MICT in conjunction with MIA and OIIU will establish the GRM in the design / preconstruction phase of the project to facilitate resolution of complaints by affected people and grievances about the project’s performance in environmental, social or gender terms is a requirement of ADB SPS and WB policies and GOK laws. The GRM will be facilitated by the OIIU and be applicable to all contractors who will be required to maintain a grievance registry or record. The OIIU or designated officer in liaison with the MIA and island council leaders and committees at the district level.

The public will be made aware of the relevant contact numbers and contact person in OIIU and MIA and each contractor / operator through media publicity, notice boards at the construction camps and sites, and local authority offices. The public will be made aware that the contractors and OIIU have an open door policy and that the complainant can remain anonymous if requested. The GRM will address affected people's concerns and complaints promptly, using an understandable and transparent process based on traditional methods for resolving conflicts and complaints. The GRM shall provide a framework for resolving complaints at the project level as well as beyond the project. If the GRM cannot achieve resolution there will be final recourse to the existing legal remedies involving relevant government offices such as mayor’s office, island councils and committees at the island level using the existing judicial or administrative remedies. The GRM will be detailed in the ESIA’s and other safeguard reports and CESMPs as required.

A project information pamphlet will be produced by OIIU in the design-preconstruction phase to include information on the GRM and shall be widely disseminated throughout the areas nearby the project by the safeguards officers in the OIIU. A local GRM liaison officer will be identified on each island. Grievances can be filed in writing or by phone (see also Annex 2) with any member of the local council, OIIU, Welfare Officer (ASWO) or at construction sites and other key public offices, all of which will accept complaints.

Existing arrangements for redress of grievances for affected persons are through complaints to the village, mayor and island council levels and through committees up to the central offices in Tarawa and back to the agency which implements a project. This indirect route will remain in place to preserve the usual administrative remedies at the island and central level. However the OIIU will seek to resolve matters at the local level with contractors and local villages in the first place to avoid overburdening on the central administration for locally resolvable complaints.

9.2 Steps and Procedures for the GRM

First tier of GRM. The contractor and local council liaison, Welfare Officer (ASWO) or OIIU are the first tier of GRM which offers the fastest and most accessible mechanism for resolution of grievances. A designated officer in the OIIU and ASWO and will accept complaints that will be passed on to the GRM Operator (secretary) for registration. Grievances can be filed in person, in writing or by phone (see also Annex 2 for GBV) with any member of the local council, OIIU, Welfare Officer (ASWO) construction sites and other key public offices. Given communication and travelling limitations resolution of complaints will be targeted to investigate within 5 days and complete in fifteen working (15) days. The safeguards officers in OIIU will provide the support and guidance in grievance redress matters. Investigation of grievances will involve site visits and consultations with relevant parties (e.g., affected persons, contractors, ASWO, police, island council etc.). Grievances will be documented and personal details (name, address, date of complaint, etc.) will be included and recorded by the GRM Operator unless anonymity is requested.

A tracking number shall be assigned by the GRM Operator for each grievance, and it will be recorded including the following elements: (i) initial grievance record (including the description of the grievance), with an acknowledgement of receipt handed back to the complainant when the complaint is registered; (ii) grievance monitoring sheet, describing actions taken (investigation, corrective measures); and (iii) closure sheet, one copy of which will be handed to the complainant after he/she has agreed to the resolution and signed-off. The updated register of grievances and complaints will be available to the public at the OIIU office and other key public offices in the area (offices of the island council and district if required). Should the grievance remain unresolved it will be escalated to the Grievance Redress Committee (GRC) at the second tier.

Second Tier of GRM. The OIIU will activate the second tier of GRM by referring the unresolved issue (with written documentation) to the implementing agency and jointly pass unresolved complaints upward to the Grievance Redress Committee (GRC). The GRC shall be established by implementing agency before commencement of site works. The GRC will consist of the following persons: (i) Project Coordinator (OIIU); (ii) representative of Islands Council; (iii) representative of the affected person(s); (iv) Welfare Officer (ASWO) or representative of other relevancy local government offices; and (v) representative of the MELAD (for environmental related grievances). A hearing will be called with the GRC, if necessary, where the affected person can present his/her concern. The process will facilitate resolution through mediation.

The GRC will meet as necessary when there are grievances that cannot be solved at the first tier and ideally within thirty (40) working days after complaints. The GRC will suggest corrective measures at the field level and assign clear responsibilities for implementing its decision and a timeframe that must be adhered to. The functions of the GRC are as follows: (i) resolve problems and provide support to affected persons arising from various environmental issues and including water supply, waste disposal, dust, noise, power and traffic interference and public safety as well as social issues, land acquisition (temporary or permanent); asset acquisition; and eligibility for entitlements, compensation and assistance and gender based violence; (ii) reconfirm grievances of displaced persons, categorize and prioritize them and aim to provide solutions within 40 days; and (iii) follow up report to the aggrieved parties about developments regarding their grievances and decisions of the GRC.

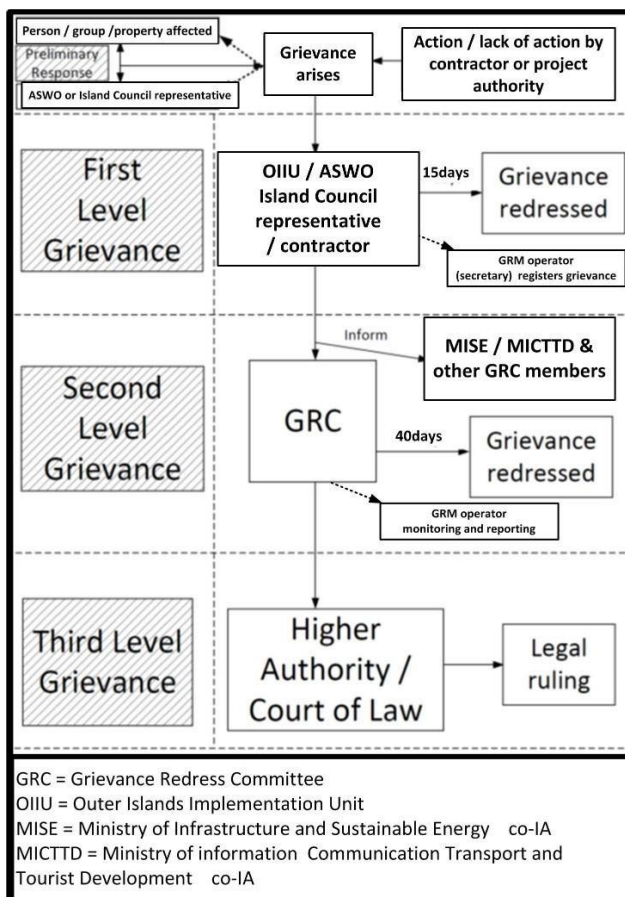
The OIIU will oversee GRM secretarial duties taken by the GRM Operator (secretary) who will be responsible for processing and placing all papers before the GRC, maintaining database of complaints, recording decisions, issuing minutes of the meetings and monitoring to see that formal orders are

issued and the decisions carried out. The contractor(s) will have observer status on the GRC committee. If unsatisfied with the decision, the existence of the GRC shall not impede the complainant’s access to the GOM’s judicial or administrative remedies.

Third tier of GRM. In the event that a grievance cannot be resolved directly by the contractor or OIIU or local island officers (first tier) or GRC (second tier), the affected person can seek alternative redress through the Island Council or Ministry of Internal Affairs under the existing arrangements for redress of grievances for affected persons. The OIIU or GRC will be kept informed by the island and national authority.

Monitoring reports shall include information about the GRM including: (i) the cases registered, level of jurisdiction (first, second and third tiers), number of hearings held, decisions made, and the status of pending cases; and (ii) an appendix which lists cases in process and already decided upon may be prepared with details such as name, ID with unique case serial number, date of notice/registration of grievance, date of hearing, decisions, remarks, actions taken to resolve issues, and status of grievance (i.e., open, closed, pending) and if it is a repeat of a previous grievance. The grievance redress mechanism and procedure is summarized in Figure 8.3. The reader is also referred to the GBV GRM in Annex 2.

Figure 9.1 - Grievance Redress Mechanism



10 Consultation and Disclosure Summary

10.1 Introduction and Stakeholder Identification

The objectives of the stakeholder consultation process were to disseminate information on the project and its expected impacts, long-term as well as short-term, among primary and secondary stakeholders and to gather information on relevant issues so that the feedback received could be used to address these issues at early stages of project design. Another important objective was to determine the extent of the concerns amongst the community, to address these in the Project implementation and to suggest appropriate mitigation measures. The feedback received has been used to address these issues at early stages of project due diligence.

10.2 Staged Stakeholder Consultations

Consultations have taken place in two phases so far and will continue during project preparation and implementation.

The first phase of disclosure and consultation took place with relevant individuals and local councils in four outer islands between August 12th and September 2nd, 2019. The three person safeguards team consisted of an International Social Safeguards Specialist (ISS) and one representative each from MIA and MISE. The 3-woman team spent 18 days on the outer islands and 2 working days in Tarawa meeting with key stakeholders.

The team met with the Island Council Mayor and Clerk at the start and completion of each island visit, as well as Elders, male and female community leaders and landowner families. In Tarawa the ISS met with the Director of the Marine Division of MICT, Director of Lands Division and Coastal Engineer at MISE as well as design briefings with the Causeway and Maritime Engineers.

In total, the team conducted in-depth interviews with 59 respondents; 13 civil servants (8 men and 5 women), 33 landowners (24 m and 9 w) and 13 community leaders (6 m and 7 w). The team also gave a brief project disclosure announcement to 600+ community members during the Assumption of Mary festival on Nonouti. The list of respondents is presented as Annex 5.

Interviews and discussions shared visual presentations of the preliminary design concepts for maritime facilities and causeways as well as the aims and objectives of the project in line with a prepared consultation guide. Respondents were asked to share information and their questions and general environmental concerns in regard to; (i) the proposed design concepts and their location; (ii) impact of infrastructure improvements; (iii) land use, land ownership and protected lands; (iv) local engagement in civil works; (v) information sharing mechanisms; (vi) grievance redress mechanism; (vii) interisland transportation priorities and risks.

The second phase of disclosure and consultation took place by Public Consultation in the four outer islands from 4th to 18th November 2019. The team consists of the National Social Safeguards/Gender Specialist, National Environmental Safeguards Specialist and representatives from MISE, MELAD and MIA. The approach to Public Consultation was designed to share the project aims and objectives, project design concept and affected persons rights in terms of grievance redress mechanism, access and entitlements

The second consultation was supported by visual aids and a project information booklet, sharing the updates to preliminary design concept. Meetings took place in village Maneabas organized through Island Councils, utilizing the Village Wardens and Church leader networks of to advertise the

consultation meetings. Women and youth will be encouraged to participate. Meetings asked for community members to raise comments and concerns and as documented below. (Subsequent consultations during implementation will also share any concept design revisions with all stakeholders).

10.3 Concerns Raised During Consultation

Table 10.1 summarizes the key concerns raised by respondents during the Social Safeguards Mission August 12th to September 2nd, 2019.

Individuals representing persons from numerous family groups were informed about the project and invited to comment on their environmental and social concerns. These stakeholders were considered to be representative of the community living in the area and the business associated with the project areas.

Table 10.1 Summarized comments and concerns at first public consultation (Aug-Sep 2019)

DATE / LOCATION / RESPONDENTS	KEY CONCERNS & COMMENTS	STATUS/ RESPONSE
Abaiang, Aug 13 th & 14 th	TOPICS FOR DISCUSSION ; (i) proposed design concepts and their location; (ii) impact of infrastructure improvements; (iii) land use, land ownership and protected lands; (iv) local engagement in civil works; (v) information sharing mechanisms; (vi) grievance redress mechanism; (vii) interisland transportation priorities and risks.	
Abaiang Mayor, lanetama Kaititake (male)	<p>Apaiang Council had received delivery of a 2.4T landing craft the week of August 12th. Abaiang Mayor and Clerk were not yet clear on how the council would utilise the landing craft other than its mandate to ferry passengers and copra between the islets and Taburoa. The official hand-over of the vessel and the full strategy for its use had not yet been determined</p> <p>The Mayor was adamant that an improved channel was needed at Taburao to enable large ships to reach the jetty or a long jetty. Ships are no longer allowed to off-load passengers after 6pm for safety concerns. When ships arrive late from Tarawa they must sit off-shore all night. Most vessels can only access the shore at high tide.</p>	Preliminary Design Concept was sent to Mayor on 25 Oct 2019
Abaiang Clerk, Arii Bwaneta (female); Taburao Landowner Teuota Ekeieta (f) Abaiang Women's Centre, Terieta (f)	<p>Abaiang women have a women's centre on Council land that they can rent for short-term accommodation for income generation. There is a 30-member women's council with a 5-member Executive body, but they have not been active for the last year.</p> <p>Safety; at low tide people must walk a long way to access the boats. Most boats will only come and go at high tide and regularly wait offshore overnight. A disabled man tried to swim to shore at night and he died. They no longer allow the boats to offload at night.</p>	Pontoon jetty proposed in preliminary design concept.
Tebontibike Landowners, Borerei Tiaon (m) and Tikarerei Borerei (f)	The proposed site was in dispute between two landowner families.	Tebontibike is no longer in the scope.
Nonouti Aug 15 th to 18 th		
Nonouti Mayor, Rotie laokiri (m)	<p>Mayor understands that the landing craft for Nonouti will be delivered in late 2019 or early 2020 and will be used to transport copra and students to and from the islets in the north.</p> <p>The Mayor is very much in favour of the boat slip as it will be useful for maintenance and to protect the landing craft during severe storms.</p> <p>Matang is the preferred passenger offload point for most vessels.</p> <p>Mayor raised a concern that culverts would make the erosion worse as currents would come from the ocean side.</p>	Preliminary Design Concept was sent to Mayor on 24 Oct 2019
Landowner Teiniku Tauman (m)	If the causeway is temporarily closed it will affect students ability to get to school. There will be a shortage of foods and cargo to the islets and they could run out of supplies. Some cargos can be moved during low tides.	Causeway closures will need to be planned in advance and arrangements made to billet or shuttle students north.
Landowners, Tibwere Kaitu (m) and Tabirira Aritanan (f)	Tibwere and Tabiria represent 2 of 3 landowner families who lease land to the Council at the proposed maritime facility site at Matang. They are very much in favour of the boat ramp and shelter.	DDR and RP will confirm land status and payments
Landowner, Teাকা Abera (m)	There is a swampy area that blocks the road north of Tebuange Village and the north of	Public Consultation to

DATE / LOCATION / RESPONDENTS	KEY CONCERNS & COMMENTS	STATUS/ RESPONSE
	the northernmost causeway. Can the project drain the swampy area on the road?	confirm the scope of the project
Women's FGD; Aoniba Tekitau, Teretia Bureneita, Bei Teene Etekia, Teroata Teingira	If the causeway is temporarily closed it will be an issue for students travelling to school and the central hospital is in Matang and sick people need to be able to reach it. There are no alternate routes on Nonouti to travel to Matang, need to use the causeways or be strong enough to walk through at low tide.	Outstanding – need a solution for the safety of all. Council landing craft made available is one possible solution.
Beru Aug 19 th to 25 th		
Beru Mayor, Buretiu Timon 9m)	The road for the alternate route to avoid the southern Teteirio Causeway is in poor condition and takes 30 minutes to reach Nuka and consumes more fuel. During the rainy season the road gets very bad. The northern causeway is important as people use it to collect firewood, coconuts and cargo from the ships. However, the alternate route in the north, the road is in better condition as its hardly ever used. The Mayor has been in his role for 4 years and during that time the Council have not entered into any lease agreements.	Causeway closures will need to be planned in advance and arrangements made to billet or transport students.
Merewen Beru Chairman, Tiimae Tauman (m)	The land at the East/Nuka end of the Teteirio Causeway is newly formed from accretion. There was a Maneaba on this spot and a big dispute over the Maneaba saw it burned to the ground. The land is now deemed public land and under the authority of the Merewen Beru The Southern and Northern Causeways get really swamped by waves during King Tides and heavy seas and is unusable	Public Disclosure to share the scope of the project
Air Kiribati Agent, Teruatu Takarua (m)	Teruatu has worked 19 years with Air Kiribati and states that even though the fares have gone up in price 2 years ago and again at the start of this year, more and more people are opting to travel by plane rather than boat. There is 1 flight per week and it is always full with passengers having to wait a week until the next flight. In 2020 the Dash 8 will start to land in Beru to accommodate the high numbers of passengers. The Dash 8 holds 37 passengers. Many students travel by plane during the school holidays.	No action required
MISE Mechaniscs, Meeti Tiaoti (m) and Tenanao Kaiea (m)	Meeti and Tenanao travelled to Beru on the LC Lennox bringing the heavy equipment that will be used to make the runway longer to receive the Dash 8. The LC Lennox is not a flat bottom ship, it has a hump on the bottom at the stern and needs a very high tide to get near the shore and then must wait for a low tide to unload the heavy machinery, which drives through the water and then is water-blasted and repaired from the damages of the salt water. The LC Lennox arrived to Beru on 20 th August and was still waiting for safe passage to shore on 26 th August. A King tide was expected on the 30 th Aug. This waiting greatly increases the cost of shipping.	Public Disclosure to share the scope of the project
Beru Acting Clerk, Amiita Aberu (f)	Village Wardens can raise community concerns through the Council and these will be minuted. But if its a project concern its better for the Councillors to raise it. The Special Constables are not police but they are trained by the police and paid by the Council to help keep the peace.	Utilize Council structure to implement the GRM
Landowner family; Tebiri Tebuke (m), Benetitto Tebiria (m), Nuea Raimon (f)	The shubs on the north side of the road at the West/Teteirio end of the Southern Causeway are considered a waiting place for spirits and as such the shrubs are considered sacred and should not be disturbed.	Any works in this area must NOT disturb the shrubs. This is a spiritual site and must be respected as such.
Tabiteuea South Aug 26 th to 30 th		
Tab South Mayor, Tebamuri Teitia (m)	There is a Junior Secondary School at Buariki, Government Station and students come from all over the island daily. For students living north of Buariki it will be problematic if the causeway is closed. The Elders Council on Tab South are called the Uean Nikai and the Chairman is Tebao Tokia, who lives in Buariki. The Council will be responsible to share labour opportunities equally through the villages. The look for experts where needed or do a random pick.	Causeway closures will need to be planned in advance and arrangements made to billet or transport students north. Labour opportunities will need to be coordinate between the Council and MISE or Works Contractor.
Landowner family, Tereaua Tewaaki (f) and Teingoa Tewaaki (f)	No one wants to go north to Tewai Village because the water is brackish now because the sea level is rising and getting into the ground water. Since the culverts became	Tewai causeway is not in the scope of the project

DATE / LOCATION / RESPONDENTS	KEY CONCERNS & COMMENTS	STATUS/ RESPONSE
	blocked, the ocean water is coming onto shore at high tide here at the SE end.	
Landowner family, Namoori Tabunoieta (m) and Baraimo Abetenoko (m)	Before the causeway this place didn't flood but now during high tides it here at the SW end.	Tewai causeway is not in the scope of the project
Landowner, Raurenti Tekaeia (m)	Tuuman Takabwebwe is the name on the lease. She is my great grandmother. The land was registered under the land commission. The Council pays land lease to others but not to this family. The Council owns the boat ramp but Raurenti built up the sea wall to stop erosion and would like to be compensated. [Raurenti is already involved in a land dispute with the Council and he did not share that fact with us during the interview. Tab South Mayor says that the boat slip belongs to Raurenti.]	Need to determine if its possible to resolve the dispute and come to an agreement for Council's use of the proposed site or the boat ramp site.
Landowner, Tetoki Kamarawa (m)	There was a full council meeting when the KOITIIP Engineers were here and they proposed to drain Tetoki's fish pond. There was not any previous consultation with him and he was not happy with the Council decision to drain the pond as the fish provide food for his family. He would like to keep his pond.	If it is not possible to keep the pond, compensation must be negotiated with Tetoki.

The community consultations process for the Kiribati Outer Island Transport and Infrastructure Improvement Project (KOITIIP) was conducted by the MISE, MICT, MIA, MWYSA, MELAD and two national consultants between 1st and 19th November 2019 on four outer islands, Abaiang, Beru, Nonouti and Tabiteuea South. The attendees were the full Island Council members, and members of the community from 5 villages on Abaiang and all villages for the other islands. The objectives were to present the Project to the public, particularly the local communities that will be directly affected, to inform and to raise awareness, and to provide an opportunity for them to express views, concerns and issues that would be considered in the project.

The public were notified and arrangements made for meetings with the Island Councils and public through the Clerk of the Island Council several days before arrival on each island.

The KOITIIP details were presented using a pamphlet for each island, prepared in advance and many copies were printed and circulated. The pamphlet briefly describes the project's objectives, locations of proposed infrastructures and matters that will be discussed during the consultation. Before each meetings the pamphlets were distributed to all participants. Concerns and comments raised during the meeting were recorded.

The consultation team consisted of: (i) Keisy Tarakabu-Team Leader, Civil Engineer, MISE (ii) Tioti Bateriki-Marine Division, MICT, (iii) Tearawa Teem-Local Government, MIA, (iv) Tewaea Keariki- Lands Management Division, MELAD, (v) Baikee Beniamina-Women's Affairs, MWYSA, (vi) Amina Uriam-National Social & Gender Specialist, (vii) Iannang Teaioro-National Environment Specialist

Table 10.2 summarizes the key concerns raised by respondents during the Social Safeguards Mission November 1st to 19th, 2019.

Table 9.2 Summarized comments and concerns at second public consultation (November 2019)

DATE / LOCATION / RESPONDENTS	KEY CONCERNS & COMMENTS	STATUS/ RESPONSE
	TOPICS FOR DISCUSSION: (i) proposed design concepts and their location; (ii) impact of infrastructure improvements; (iii) land use, land ownership and protected lands; (iv) local engagement in civil works; (v) information sharing mechanisms; (vi) grievance redress mechanism; (vii) interisland transportation priorities and risks; (viii) coastal erosion and proposed counter measures, (viii) benthic fauna & flora, (ix) sources for aggregates	
ABAIANG, Nov 1 st to 5 th .		
Island Council Meeting	Land ownership Taburao – The land to be used by the project is owned by Taom Tiimi. Kakoroa's land is on the other side of the road which will not be disturbed by the project. The vice Mayor Tiitiku K. is one of the descendants of Kakoroa confirmed this.	Confirmed by the council
Councillors	A narrow passage was raised during the first visit by the engineers to allow small boat reach the shore during low tide. This is not included in the scope. Is there a significant impact to our marine resources if reconsidered again? Boat channel is also needed so that offloading and loading can also be done during low tide.	Pontoon jetty is included, but will be raised for further discussion to the Banks.
Councillors, Taburao, Koinawa, Tebero, Tuarabu, Tanimaiaki villages	The past projects paid \$2 for aggregate (empty sack of rice), can the project apply the same?	This is to be raised to the banks.
Tebero village	We do not have any technical ideas or skills and hence we rely much on the project's advice, future impacts will be the government's responsibility.	The proposed designs by the engineers will ensure that there will be no or very little adverse impacts to your marine resources.
Council and all the 5 villages (Koinawa, Evena, Tebero, Tuarabu and Tanimaiaki)	Agree that all men and women have equal access to employment opportunities. But there are heavy works that the women may not be able to do and men cannot allow that so we will take the heavy load again. It may be unfair for the men. Proposal of 30% as women is not a problem. Women in supervisory roles (qualified) is not a problem to men. To reduce the risk especially for women, the couple should decide before allowing the wife or husband before competing for any available work.	Civil works are not yet identified but there may be hard and light work. This concern is noted for the Banks to consider. Men and women should consider in light of the risks mentioned but all will be encouraged for any opportunity.
Council and the 5 villages	Grievance Redress mechanisms – Everyone agreed on the GRMs for general complaints to the councillor or council while GBV through SafeNet.	Everyone agrees
Council and the 5 villages	Sharing information through the Council and the villages is good. It does make us aware of the project as well as our ideas are heard.	
Tuarabu village (only one man raised this) the rest are ok	We have our urgent and priority needs e.g. water, road etc. Travelling to and transporting our cargoes to and from Tarawa is not a problem.	This is noted.
Women from the villages	Access to employment opportunities will increase our income and our standard of living. Those who cannot work in the project can do small trading activities e.g. selling food and drink etc.	
Some villages	Some of the anticipated risks are: pregnancy, jealousy, GBV etc.	
Tuarabu village	Benthic fauna especially "te nouu" (<i>Strombus luhuanus</i>) and "te bun" (<i>Anadara holoserica</i>) are abundant at the mud flat, and there is a concern the regular use of the jetty will affect them.	The effect will be very low and is site specific.
Tuarabu village	Question of the carrying capacity of the pontoon. Can the truck use the pontoon?	Will refer the question back, but it is most likely that it will not.
Councillors	There are sites on Abaiang where aggregate mining is prohibited. These sites are managed by the Environment & Conservation Division of MELAD and the Island Council. Aggregates needed for previous projects were sourced outside the prohibited areas, mostly from the beaches facing the ocean side of the island. For this project, aggregates will also be sourced from these locations.	
Councillors	Coastal erosion is a very serious problem on the island.	The proposed structures have minimal effect
NONOUTI, 7 th – 11 th Nov 2019		
Land ownership – Teekea Teburae and Tabiria Tibwere	Deregistration of Natanaera Tetakea and registration of Tokiaba Natanaera has been confirmed by the land court 22 Oct, 2015. The council, in its meeting with the KOITIIP team dated 7 th November, 2019 confirmed this. The other land owner, Mr. Teekea Teburae's land starts at the corner of the old copra shed (north and lagoon side) while Tokiaba towards the Mautari. The name of the plot is Teamwaerere 291/2N for Teekea	Caretaker for Tokiaba Natanaera's land (Tabiria and Tibwere) and Teekea Teburae support the project (ramp and shelter).

DATE / LOCATION / RESPONDENTS	KEY CONCERNS & COMMENTS	STATUS/ RESPONSE
	Teburae. The identified coconut tree to be cut falls under Teekea's land. The other land owners Nei Moa Moutu and Boata Katakua have their lands south of Tokiaba and will not be disturbed by the project.	
Taboiaki village	Avoid night shift as this might encourage sexual harassment	This is noted.
Council	Aggregates is sourced from anywhere at the beaches facing the ocean. But for the two northern causeways the aggregates will be extracted from the end of the last islet where there is no causeway.	
Council	Since the completion of the southern causeway, marine life in the lagoon has decreased and there is no more fish spawning run.	
Council	4 th Causeway from the north is very low and request if this can be raised along with the adjacent lands so that the road and the causeway can be used during high tide.	
Council	Several years after the northern causeway was completed the lagoon water has find a way into the land flooding the adjacent low land north of the causeway during every high tide. Can the project assist to install erosion counter-measure structures at the lagoon side or raise the road?	
Tenanoraoi village	A traditional fish trap at the lagoon side of the southern causeway is completely inundated and is no longer visible. An old man kindly requested if several culverts are inserted so the previous marine life can be restored.	
Rotimwa village	Beside the erosion adjacent to the causeways, can the project also considers other eroded areas along the island?	The project will only provide for areas around the causeways. However the people can approach the island council to raise the issue with the Office of Te Beretitenti under the Disaster fund.
Temanoku village	Offloading for all cars/trucks arriving at Nonouti are done at Temanoku village. Why the project is not considering the upgrading of the site as well and has the Government arranged for a land lease with the landowner? Even if the ramp is constructed at Matang, that ramp will be of no use and would not improve the offloading condition of cars/trucks at all.	Will take the comments/question raised for consideration
TABITEUEA SOUTH, Nov 12 th to 16 th		
Council	Kindly request if the project can assist with planting of mangroves not only at the causeways but along the island	Will take the comments for consideration.
Taungaeaka village	With regards to eroded and accreted areas, there are several areas adjacent to the causeway that are seriously eroded and other areas that have accreted high volume of sands. Besides having the project to build groynes and other structures as counter measures to erosion, can the project extract sand from the accreted areas to fill the eroded areas?	Will take the comments for consideration.
Tewai village	A new road south of the 2 nd North causeway near the lagoon has completed eroded away and a new one is now being used. Some landowners can block the road with pile of dead leaves and logs. Can the project assist to rebuild the old road?	Will take the comments for consideration.
Tewai village	Previous contractors on previous projects have left behind three huge trucks. The trucks are corroded. Can the project consider to take all their wastes from the island?	All EIA considers these issues and ensures that all waste cannot be reuse on the island is taken away
Tewai village	The vessels are also using Tewai to offload cargoes and load copra. Can a ramp be built at Tewai offloading/loading area?	Tewai is not included in the project but will take the question for further consideration.
Caretaker Moote Kaiea for Tuuman's land at Teobokia	Site 3 is not part of the council lease. Council lease stops at the maneaba. Tuuman's daughter has no problem if the piece of land required for the shelter (KOITIIP). Moote Kaiea, caretaker for Tuuman's lands is in favour of the project and will cooperate to ensure the boundary determination and agreement is processed and developed.	Council will process the boundary determination and agreement between the Land owner in land court first week of December, 2019.
BERU, Nov 16 th to 19 th	TOPIC FOR DISCUSSION: proposed design concepts and their location; (ii) impact of infrastructure improvements; (iii) land use, land ownership and protected lands; (iv) local engagement in civil works; (v) information sharing mechanisms; (vi) grievance redress mechanism; (vii) interisland transportation priorities and risks; (viii) proposed design concept for marine infrastructure, (ix) proposed design concept for causeway is not final and the people's opinion are sorted if the causeway is to	

DATE / LOCATION / RESPONDENTS	KEY CONCERNS & COMMENTS	STATUS/ RESPONSE
	have culverts (x) coastal erosion and proposed counter measures, (xi) benthic fauna & flora, (xii) ciguatera fish poisoning and reef ecosystem, (viii) sources for aggregates.	
Tebikeriki Beru	The council confirmed that ramp belongs to Marewen Beru. The land adjacent to the ramp is the LMS's. The land south of the KOIL belongs to Karekeman. This is not public land and require boundary determination between the Council and land owner.	Council to process boundary determination and lease agreement.
Nuuka village (Protestant Church)	Contract between the employer and employee is developed and signed. They should be translated so we can understand the content of the contract.	This is noted.
Council	Culverts are needed for the two causeways but request if the gate system can be considered as part for the culvert so that the farmed milk fish can be maintained in the enclosed lagoons.	
Taboiaki	People are happy that the marine fauna and flora of the enclosed lagoons will be restored to some extent when the culverts are inserted (if the causeway is to be improved). However, they also noted that the salinity level at areas along the shores of the two enclosed lagoons has improved quite a lot since the lagoons were closed compared to historic levels (stories from their old people). Likewise coconut trees are growing very well at the lagoon edges. They proposed that no culverts are to be inserted.	
Tabiang	Same issues and comments as above.	
Nuka village (Catholic)	As above but also concerned that the airport could be flooded if the culverts are inserted.	
Nuka village (Catholic)	It is claimed by the people that the closure of the two lagoons has contributed to (i) the lagoon depth has become shallower over the past years, (ii) the two end of the islands are eroded badly that (a) the salt that is usually form at the lake/bond (Nei n Taoro) located at the northern end of the island is no longer possible since seawater has intruded into the lake from the bottom, (b) the bokaboka lake (Nei ni Bokaboka) will soon (few years) be connected to the ocean water if action to stop the erosion at the site is not taken. Can the project assist to provide erosion counter-measures to these sites?	Will take the comments for consideration.

At this stage no significant potential constraints have emerged from public or private groups for the project and the project is expected to take place on Government land.

The project is not expected to have severe involuntary resettlement impacts (IR). Government land has been identified for marine facilities in two locations and public land for a third location. In two locations, where government land was not available, private native land has been proposed for a marine facility and a passenger shelter. These sites, which will require new lease agreements, are not inhabited by homes, business or settlement of any kind. The project will seek to enter into a voluntary lease agreement with the landowners of these sites. Proposed sites are not immutable. Compensation for a very few coconut trees is anticipated and an Island Council owned bush toilet may need to be relocated for construction of the marine facilities.

All causeway works will take place on government land. No relocation of housing or settlements will be required. Compensation for loss of 1 fishpond is may be required and possibly a very few coconut trees may need to be removed and compensated (both subject to detailed design). Temporary land use for batching plant and extraction of construction materials and contractor facilities will need to be determined once the Civil Works Contractor is involved. The Resettlement Plan will need to be updated at the pre-construction stage to reflect the details of entitlements.

All necessary land acquisition will be based on meaningful consultations with landowners and other affected persons (APs). Land acquired will be appropriately compensated based on current market value. The Resettlement Plan sets out the consultation processes, laws, and mechanisms for calculating market value and replacement costs for land and other assets.

10.4 Further Information Disclosure

Consultations will continue throughout preconstruction and construction phase as per stakeholder engagement plans. Records including reports on environmental and social concerns will be kept in a simple database in the OIIU Project Office (see also GRM section for complaints).

The project will also support the beneficiaries' participation and feedback during project preparation and implementation and will implement specific measures to secure citizen engagement. The integration of sustainable citizen engagement processes could include communication and outreach, participatory planning, community monitoring, as well as consultations with direct beneficiaries. The project would support capacity building targeting community monitoring actors including local NGOs, community focal points, the project implementation unit, as well as elected officials. The outreach and consultations would provide space for the project to explain to the outer islands communities the project activities, related risks such as gender-based violence, as well as the grievance redress mechanisms available. The project will include indicators as part of the results framework.

Information disclosure will be undertaken as per the requirements of World Bank and ADB SPS consultation requirements. In disclosing the environmental documents to the public, the GOK through the MISE and MICT as IAs and with support from OIIU will be responsible for (i) providing the IEE/ESIA, RP (or Land Due Diligence Report) to ADB/WB for review and making sure that the statutory environmental assessment is progressed with MELAD for clearance; (ii) ensuring that all environmental assessment documentation, including the environmental due diligence and monitoring reports, are properly and systematically kept as part of the project specific records; (iii) disclosing all environmental and resettlement documents, and making documents available to public, on request; and (iv) providing information to the public and stakeholders as per the Project's Stakeholder Engagement Plan (Annex 9).

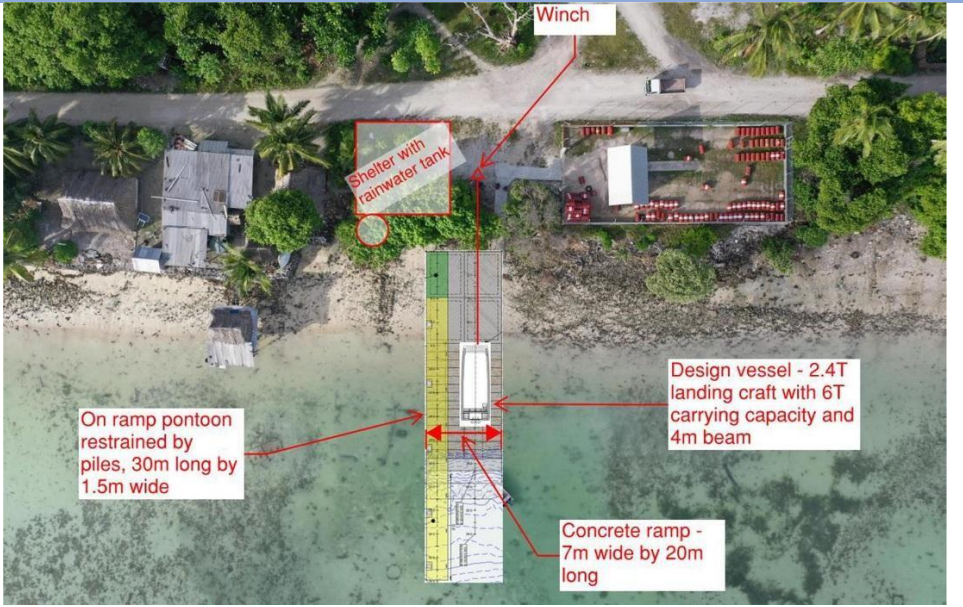
Disclosure of relevant environment and resettlement safeguards documents will be in an appropriate form, manner, and language and at an accessible location to be understandable to the affected people and local stakeholders.

11 Annexes

Annex I Summary of Location and Conceptual Layouts

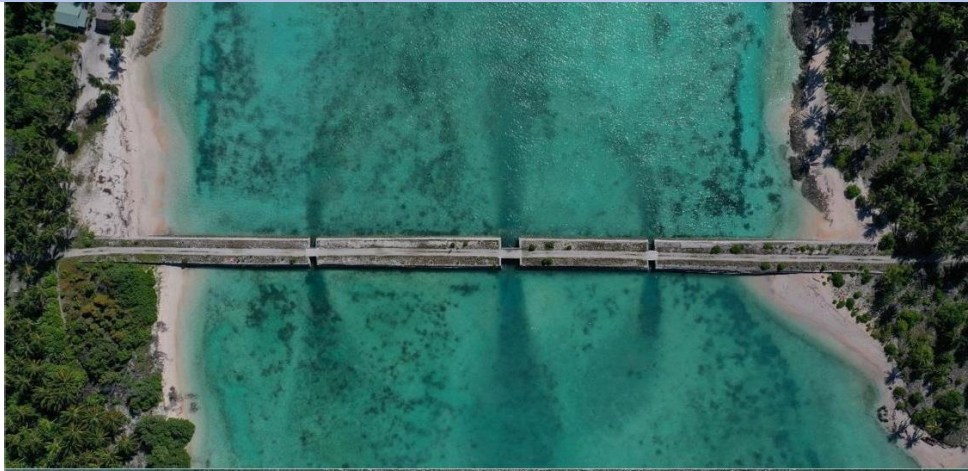
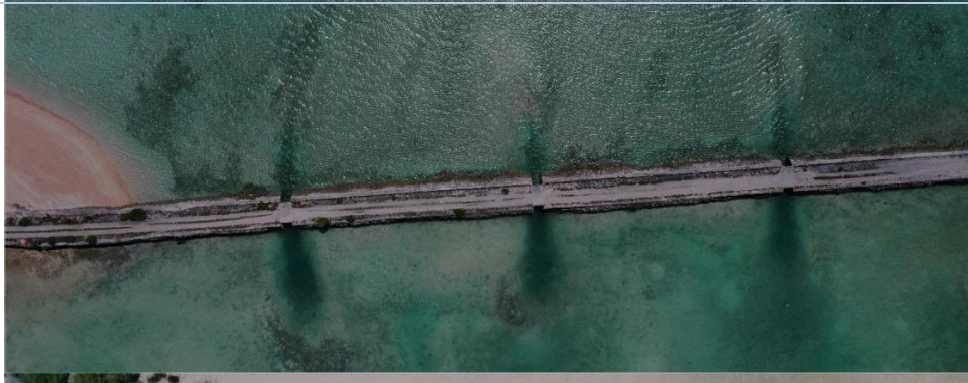

Project Concept: Summary of conceptual plans utilized during due diligence


Abaiang

Location	Proposed Infrastructure	Location and Conceptual Layout (preliminary)
Abaiang, Taburao	Multi-purpose boat/passenger/cargo shelter w/rainwater tank Fix jetty with dimensions of 30m long x 1.5m wide and 20m long x 7m wide concrete ramp and Winch	
Abaiang, Taburao	Contractor facilities Borrow sites, batching plant	UNKNOWN


Nonouti

Location	Proposed Infrastructure	Conceptual Location and Preliminary Layout
Matang, Nonouti	Multi-purpose boat/passenger/cargo shelter w/rainwater tank - concrete ramp	
Matang, Nonouti	Contractor facilities Borrow sites,	UNKNOWN

Location	Proposed Infrastructure	Conceptual Location and Preliminary Layout
	batching plant	
Northern Causeway Just south of Tebuange Village	a. General surfacing clean up; Typically, pothole repair, grading and rolling surface; b. Install mangroves and gabion groynes Tebuange Village & School in the north and Matabou Village in the South. The combined name of these villages is Benuaroa;	
2nd from North Causeway South of Matabou	a. General surfacing clean up b. Planting mangroves and installation of gabion groynes c. Discrete structural repairs at several locations to the east revetment of the causeway	
3rd from North Causeway 1km South of Teuabu	a. General surfacing clean up b. Install mangroves and gabion groynes	
4th from North Causeway 5km north of Ruta Primary School	a. General surface clean-up; Typically, pothole repair, grading and rolling surface.	



Location	Proposed Infrastructure	Conceptual Location and Preliminary Layout
Southern Causeway South of Taboiaki	a. General surfacing clean up; b. Structural repairs to east wall and verge; c. Install 2 culverts and provide precast concrete blocks adjacent to the culverts as scour protection; d. Install mangroves and gabion groynes as erosion countermeasure.	
Nonouti	Contractor facilities Borrow sites, batching plant	UNKNOWN




Beru

Location	Proposed Infrastructure	Location and Conceptual Layout (preliminary)
Tebikeriki, Beru	Passenger/cargo shelter	
Tebikeriki, Beru	Dredge the channel and create a turning basin for 2.5m draught boat. AtoN markers at entrance of channel and service existing shore-side AtoN markers	
Tebikeriki, Beru	Contractor facilities, borrow sites, batching plant	UNKNOWN

Location	Proposed Infrastructure	Location and Conceptual Layout (preliminary)
<p>Northern, Kaarirai Causeway</p>	<p>Install mangroves and gabion groynes Possible additional rehabilitation works will be considered, based on further assessment at the time of project implementation</p>	
<p>Southern, Teteirio Causeway. This causeway runs east-west from Nuka to Teteirio</p>	<p>Install mangroves and gabion groynes Possible additional rehabilitation works will be considered, based on further assessment at the time of project implementation</p>	
<p>Beru</p>	<p>Contractor facilities, borrow sites, batching plant</p>	<p>UNKNOWN</p>

Tabiteuea South

Location	Proposed Infrastructure	Location and Conceptual Layout (preliminary)
<p>Buariki, Tab South</p>	<p>Multi-purpose boat/passenger/cargo shelter with rainwater tank Concrete ramp</p>	
<p>Buariki, Tab South</p>	<p>Contractor facilities Borrow sites, batching plant</p>	<p>UNKNOWN</p>
<p>Causeway 1</p>		<p>Not in scope of works</p>
<p>Causeway 2 Tangeaka tebuaki Nth</p>	<p>a. General surfacing clean up. Typically, pothole repair, grading and rolling surface; b. Renew 100m length of sandbag road edging; c. Install 2 additional culverts; d. Plant mangroves and install gabion groynes.</p>	

Location	Proposed Infrastructure	Location and Conceptual Layout (preliminary)
<p>Causeway 3 Tangeaka tebuaki Sth</p>	<p>a. General surfacing clean up; b. Renew 60m length of sandbag road edging; c. Empty the contents of the stagnant pond – subject to further assessments; and d. Install 2 culverts.</p>	
<p>Causeway 4</p>	<p>a. Add geocell wearing course; b. Plant mangroves and install gabion groynes.</p>	
<p>Causeway 5 Buariki to Aranuka</p>	<p>a. Reconstruct approx. 70m of causeway; b. Add geocell wearing course; c. Repairs to approx. 150m of west causeway wall; and d. Plant mangroves and install gabion groynes.</p>	
<p>Tabiteuea South</p>	<p>Contractor facilities Borrow sites, batching plant</p>	<p>UNKNOWN</p>

Annex 2 Gender Assessment, Gender Based Violence Framework, GRM for gender based violence cases and draft Code of Practice

Gender Assessment KOITIIP

Gender Gap Analysis

According to the GOK Kiribati gender discrimination is culturally entrenched and presents a major challenge that will take sustained normalisation over a period of years before noticeable changes can occur.⁸ Kiribati has one of the lowest number of women represented in national parliament in the world (6.5 percent) and only around 33 percent of women participate in the labour force compared to 53 percent of men.⁹ The majority of formal businesses are owned and controlled by men (57 percent).¹⁰ Women are mainly engaged in the informal sector and their work is usually home-based care work, subsistence agriculture, marketing of agricultural products, and informal trading. GBV rates in Kiribati are more than twice the global average with 68 percent of ever married women aged 15-49 in Kiribati having been subject to GBV.¹¹

Women in outer islands have limited or no access to services and economic opportunities, particularly employment.

National statistics fail to capture the lived experiences of women living in the outer islands which is further comprised by geographic remoteness, lack of economic opportunities and essential services and even less progressive gendered attitudes and norms which limit their mobility, decision making and place them at increased risk of GBV. Women in the outer islands are geographically isolated. They depend on unreliable boat transfers and irregular domestic flights (some operating once per week) for secondary education, health services, banking, employment and economic opportunities. Secondary education, employment opportunities and comprehensive health services are absent in the outer islands and can only be accessed in Tarawa.¹²

All employment opportunities in outer islands centrally managed by GOK and posts (council clerks, teachers, nurses, police, assistant social workers, water and agriculture officers) are filled by government employees from the capital. Data indicates that 5,168 public service posts were established in 2018, an increase from 4,952 in 2017 (Government of Kiribati 2017). The only economic opportunity for women on outer islands is informal trading of handicrafts, copra and fresh food, such as fish. All trading requires boat travel (or the transportation of goods by boat) to Tarawa and other islands. Unpredictable boat schedules make it difficult to expand trading opportunities or depend on income generated from trading, especially from fresh food and copra. Offshore docking of boats makes it difficult for women to load and unload their cargo and makes it unsafe for passengers who are elderly, children or disabled.

Women in outer islands face barriers to working in non-traditional sectors such as construction.

⁸ GOK (2018) *Voluntary National Review and Kiribati Development Plan Mid-Term Review* (p.62).

⁹ ILOSTAT (2018) <https://www.ilo.org/ilostatcp/CPDesktop/?list=true&lang=en&country=GBR>

¹⁰ Statistic provided by Ministry of Commerce (October 2019).

¹¹ Secretariat of the Pacific Community, 2010. *Kiribati Family Health and Support Study: A study on violence against women and children*. Noumea, New Caledonia.

¹² All secondary and post-secondary education opportunities are located in Tarawa. Health services in outer islands are limited to nurses and medical assistants. All serious health cases are referred to the hospital in Tarawa.

In Tarawa, there is an observable trend towards women studying and working in non-traditional sectors, such as engineering, plumbing, carpentry, construction and maritime related professions.¹³ Female graduates are finding work with the Public Utilities Board, MISE and development projects such as the construction of the road in Tarawa and water project. In the outer islands, due to high competition for employment opportunities, women are unlikely to be selected for work in non-traditional sectors such as infrastructure, however, obtaining work experience in this area would guarantee their future employment opportunities and improve their access to vocational education courses in Tarawa. Research and consultations in outer islands also points to other barriers facing women moving into non-traditional areas of work. In outer islands men explained that women speaking with or working with unfamiliar men could cause jealousy and could contribute to increasing the risk of violence against women.¹⁴ Solutions should focus on garnering men's support for women's employment and minimizing the risks to women at work, and increasing the employment of qualified female graduates from South Tarawa.

GoK SafeNet coordination mechanism for GBV services exists but is not operating in all outer islands.

Levels of gender-based violence are thought to be higher in South Tarawa than in the outer islands, which could be the result of greater availability of alcohol and social problems such as high unemployment, overcrowding and high cost of living.¹⁵ However, it could also point to greater stigma and less reporting back to Tarawa from the outer islands. During discussions in Abaiang, police said the overwhelming majority of their call outs were for domestic violence cases involving alcohol. The Assistant Social Worker in Abaiang said she had already handled more than 40 cases (or one per week) in 2019.

The GOK has established a national SafeNet referral system linking health, police and social welfare services, however this has not been rolled out in all outer islands. Abaiang has a SafeNet committee and officers in place. Other islands where KOITIIP will be implemented have assistant social workers in place, but coordinated services are lacking. Due to the lack of services (particularly, legal and medical services) available in outer islands, the SafeNet system is in place to refer serious cases to Tarawa and to facilitate the evacuation of survivors. The services provided by SafeNet in outer islands are limited to basic counselling, awareness and prevention on GBV and evacuation.

Implementing partners have no experience of gender mainstreaming in infrastructure.

MWYSSA is mandated to mainstream gender across the GOK. At present there are no gender focal points in Ministries and Ministries are not required to report on their gender work. MWYSSA has no experience working on gender in infrastructure or construction. Lead stakeholder ministries (Ministry of Infrastructure and Sustainable Energy (MISE) and Marine Division of the Ministry of Information, Communications, Transport and Tourism Development (MICT)) have 20-30 percent female staff and while most of these are working in administrative positions, there are female engineers, inspectors and supervisors. Consultations highlighted challenges facing women staff in the implementing agencies working in male-dominated fields. Some challenges include inappropriate comments and sexual jokes in the workplace; women feeling unsafe to participate in certain work-related travel when alone or with male colleagues; and limited knowledge of, and access to, support networks and services (WB GBV strategy). GOK public service developed a sexual harassment at work policy 2018 but this policy has not been operationalised. Building the capacity of stakeholder ministries is critical to delivering effective gender

¹³ The Kiribati Women in Maritime Association (KWIMA) was established in 2018 to promote the role of women working in related fields.

¹⁴ Secretariat of the Pacific Community. (2008) Kiribati Family Health and Support Study: A study on violence against women and children, Noumea: Secretariat of the Pacific Community.

¹⁵ Secretariat of the Pacific Community. (2008) Kiribati Family Health and Support Study: A study on violence against women and children, Noumea: Secretariat of the Pacific Community

mainstreaming results. MISE and MICT are primarily responsible for understanding and mitigating gender related risks and for ensuring a safe working environment and professional development opportunities for women in transport.

Priorities

4. Improve women's access to services and economic opportunities in outer islands.
5. Promote safe employment and professional development opportunities for women working in transport sector.
6. Build the institutional capacity within the stakeholder ministries on effective gender mainstreaming strategies and operationalise GOK commitments on gender-based violence and sexual harassment.

Actions

- Contractor conducts at least 1 community consultation in each project site to raise awareness of women working in non-traditional sectors (50% women).
- Contractor or OIIU establishes partnership with Kiribati Institute of Technology (KIT) to promote the employment of female graduates (in construction related courses) on KOITIIP.
- All-female work crews (one on each island) on causeway and jetty construction.

Indicators

- At least 40% women employed by the project in skilled and unskilled positions.
- Four all-female work crews (one on each island) on causeway and jetty construction.

	Analysis	Action	Indicators
<p>Gender Pillar: Removing constraints for more and better jobs.</p> <p>Priorities: Improving women’s access to services and economic opportunities in outer islands. Promoting safe employment and professional development opportunities for women working in transport sector.</p> <p>Gender Gap: Access to paid employment opportunities.</p>	<ul style="list-style-type: none"> • 33 percent of women participate in the labour force compared to 53 percent of men. • Females comprise 27 percent of graduates in science, engineering, manufacturing and construction (GoK Census 2015). • Women in outer islands face barriers to working in non-traditional sectors such as construction. • High competition for employment opportunities and discriminatory attitudes towards women makes it unlikely that women in outer islands will be selected for day labour positions. • Promoting women’s work in construction will increase future employment opportunities and improve access to vocational education courses in South Tarawa. 	<ul style="list-style-type: none"> • Contractor conducts at least 1 community consultation in each project site to raise awareness of women working in non-traditional sectors (50% women). • Contractor or OIU establishes partnership with Kiribati Institute of Technology (KIT) to promote the employment of female graduates (in construction related courses) on KOITIIP. • All-female work crews working on causeway and jetty construction. 	<ul style="list-style-type: none"> ☐ At least 40% women employed by the project in skilled and unskilled positions. ☐ Four all-female work crews (one on each island) on causeway and jetty construction.

Implementation arrangements

1. Appointment of Gender Focal Points in the key implementing agencies.
2. Partnership with Ministry Women Youth Social Affairs to provide GBV training for Associate Social Workers in outer islands and to conduct community awareness raising activities. Ministry of Women, Youth and Social Affairs will be included in the project steering committee.
3. Orientation and capacity building on gender activities and GBV framework implementation and related requirements are conducted for the executing agencies, implementing agencies/implementation consultants, contractors and other key implementing partners.
4. TA (international and national) responsible for implementation of the gender activities and GBV Framework in OIIU.
5. Action plan implementation is integrated in the MISE and MICT implementation reports, where applicable.
6. A budget envelope will be allocated to cover GBV Action Plan activities corresponding to approximately 452, 000USD.

Gender Based Violence Framework

Actions taken to address GBV risks	Timing for Actions	Responsibility	Status	Comments
Review the IA's capacity to prevent and respond to GBV as part of Safeguard Preparation.	Preparation	WB Gender Specialist National Gender Social Safeguards Specialist	Completed	<ul style="list-style-type: none"> Discussions on GBV were included as part of due diligence missions (August, October, November 2019). A gender capacity assessment was conducted in September 2019 by the International Gender Specialist and findings were included in a Gender Analysis. Ongoing consultations and discussions on the GBV responsibilities will continue for the life of the project.
As part of the project's stakeholder consultations, those affected by the project should be properly informed of GBV risks and project activities to get their feedback on project design and safeguard issues.	Preparation / Implementation	WB Gender Specialist	ongoing	<ul style="list-style-type: none"> Consultations were held with stakeholder ministries, SafeNet representatives and GBV service providers as part of the design of the GBV Framework. Social Safeguards International Consultant, International Gender Specialist and National gender and social safeguards specialist discussed GBV risks and proposed activities with women and men in the project sites. Ideas included in the GBV Framework were discussed and tested with stakeholders during a consultation workshop (October 11). Further consultations will be conducted in each project site as per the GBV Framework.
Map out GBV prevention and response actors in project area of influence. This should incorporate an assessment of the capabilities of the service providers to provide quality survivor centered services.	Preparation	Gender Specialist	Completed	<ul style="list-style-type: none"> A mapping of GBV service providers operating in Kiribati and in the project sites has been conducted and is included in the ESMP. Guidance on the referral protocols and national laws (Kiribati Children Young People and Family Welfare Act and Kiribati Occupational Health Safety Act, Kiribati Terrorism and Organised Crime Act) and policies (National Approach to Ending Sexual and Gender Based Violence in Kiribati) is also included in ESMP. An assessment of existing services was conducted in June 2019 and finalised during consultations in October 2019.
GBV risks are adequately reflected in all safeguards.	Preparation / Contract Awarding	WB Contractor	Draft	<ul style="list-style-type: none"> ESMP includes GBV Plan and draft instruments (CoC, GRM, GBV stakeholder mapping). Stakeholder consultation plan includes GBV mapping and draft GRM. Risks at and around the project sites including equal access to facilities (separate locker rooms, lighting, toilets). C-ESMP will include finalised GBV Framework and instruments.
Develop a GBV Framework including the Accountability and Response Framework as	Preparation / contract awarding	WB / Contractor	Draft	<ul style="list-style-type: none"> Draft GBV Framework developed October 2018.

part of the ESMP. The contractor/consultant's response to these requirements will be required to be reflected in their C-ESMP.				
The Stakeholder Engagement Plan of the project, which will be implemented over the life of the project to keep the local communities and other stakeholders informed about the project's activities, to specifically address GBV related issues.	Preparation and implementation	WB / Contractor	Draft	<ul style="list-style-type: none"> • There is a plan to display signs around the project site that signal to workers and the community that the project site is an area where GBV is prohibited. • The GBV Framework, CoC, GRM will be translated into local language and discussed as part of all consultations. • KOITIIP will work with GOK SafeNet partners to deliver GBV awareness activities and training.
Make certain the availability of an effective grievance redress mechanism (GRM) with multiple channels to initiate a complaint.	Preparation and implementation	WB / Contractor	Draft	<ul style="list-style-type: none"> • A draft GRM GBV has been developed (October 2019). • MOU will be developed with Ministry Women Youth Social Affairs and Sport (MWYSSA) identifying them as the GBV Provider. • A support fund for survivors of violence will be managed by the OIIU. This fund will be used by the OIIU for the evacuation of survivors and mediation (no direct payments will be made to survivors). • A GRM Operator (National GBV Specialist) will be appointed to the OIIU full time to oversee the implementation of the GBV Framework and GRM. • A national free call Help Line (191) is in service. • A SMS number for registering anonymous complaints will be established by the OIIU. • A TOR has been developed for National GBV Specialist (fulltime) working within the OIIU and International Gender Based Violence Specialist (intermittent) to oversee the implementation of the gender and GBV activities. • GBV requirements will be included in bidding documents. • A draft code of conduct has been developed and will be finalized by contractors.
GBV Action Plan has been developed and will be implemented and monitored by the National Gender and Social Safeguards Specialist based in OIIU and an intermittent international GBV expert.	Preparation and implementation	Gender Specialist GBV Specialist National Gender Social Safeguards Specialist	Draft	<p>The activities included in the GBV Framework and Gender Assessment GBV specific objectives, targets and activities include:</p> <p>Objectives:</p> <ol style="list-style-type: none"> 1. Promote safe employment and professional development opportunities for women working in transport sector. 2. Build the institutional capacity within the stakeholder ministries on effective

				<p>gender mainstreaming strategies and operationalise Government of Kiribati (GOK) commitments on gender-based violence (GBV) and safe workplaces.</p> <p><u>Activity 2.4:</u> Contractor supports the implementation of KOITIIP GBV requirements (code of conduct, signage on GBV, consultations, Grievance Redress Mechanism for receiving, registering, referring and reporting complaints).</p> <p><u>Target 3.2:</u> GBV referral mechanism (SafeNet) operational in 100% project sites (baseline 2019: 25%).¹⁶</p> <p><u>Activity 3.1:</u> At least 2 training courses provided to all Assistant Social Welfare Officers (MWYSSA) in project sites on KOITIIP GBV Framework and GRM.</p> <p><u>Activity 3.2:</u> OIIU maintains a support fund for GBV survivors.</p> <p><u>Target 3.3:</u> KOITIIP steering committee includes MWYSSA representative.</p> <p><u>Target 3.4:</u> 100% of project staff and contractors (male and female) trained on KOITIIP gender related instruments and GOK GBV commitments.¹⁷</p> <p><u>Activity 3.3:</u> OIIU implements a GBV Framework and has systems in place to address gender-based violence among workers and the communities (signage, Code of Conduct and a Grievance Redress Mechanism for receiving, registering, referring and reporting complaints).</p> <p><u>Activity 3.4:</u> Collection and analysis of sex disaggregated data, monitoring and reporting of the Gender Assessment and GBV Framework.</p>
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¹⁶ SafeNet is only operating in Abaiang. Service providers exist in Beru, Nonouti and Tab. South but services are not linked under a SafeNet committee and do not follow SafeNet Standard Operating Procedures.

¹⁷ National Gender Equality and Women’s Development (GEWD) Policy (2017), and the National Approach to Eliminating Sexual and Gender Based Violence (ESGBV) Policy and Action Plan 2011-2021.

Grievance Redress Mechanism for Gender Based Violence (GRM GBV)

The KOITIIP proposed GRM GBV has been put in place to handle all GBV complaints in and around the project site. Complaints about perpetrators not linked to the project can also be handled by the GRM. Complaints can be made via existing complaints mechanisms in Kiribati national free call Help Line 191, face to face or via SMS to a number that will be set up by the OIIU. Complaints can be received by the project GRM Operator or SafeNet members operating in or around the project site. Complaints can be made by complainants, community members, leaders or colleagues.

The existing GOK SafeNet will also be used by the GRM Operator to refer and handle complaints. A MOU between the MWYSSA and KOITIIP establishing the responsibility of MWYSSA as the GBV Provider and KOITIIP staff as the GRM Operator (based in the OIIU). The GBV Provider will ensure that all GBV complaints made to the Assistant Social Welfare Officer (ASWO) will be shared with the GRM Operator for registering. Once a case is resolved, the ASWO will also be required to share the outcome with the GRM Operator who will register the resolution.

KOITIIP will support MWYSSA to operationalise SafeNet processes in four outer islands (Abaiang, Beru, Tab. South and Nonouti). This will be achieved through:

- Awareness raising during due diligence consultations with communities and throughout the program implementation.
- Training for SafeNet members on the KOITIIP GBV Framework and tools. Training will be conducted by GBV SafeNet trainers (UN Women, Fiji Women’s Crisis Centre and MWYSA) and will be offered to the ASWOs and SafeNet members.
- Establishment of a GBV support fund to be used for the evacuation and care of survivors.¹⁸ The GBV support fund will also be used for mediation when users are not satisfied with the proposed resolution achieved under the SafeNet system.

All reported GBV cases will be treated confidentially and KOITIIP will store no identifiable information on the survivor / complainant. The GRM Operator will only register the following information:

1. Nature of the complaint
2. Perpetrator’s connection to KOITIIP
3. Sex and Age of the survivor

All GRM procedures will be transparent and shared with all staff and contractors and communities during consultations.

Reporting on the GRM will be included in all Aide memoires, implementation status reports (ISRs). GRM reporting will only include:

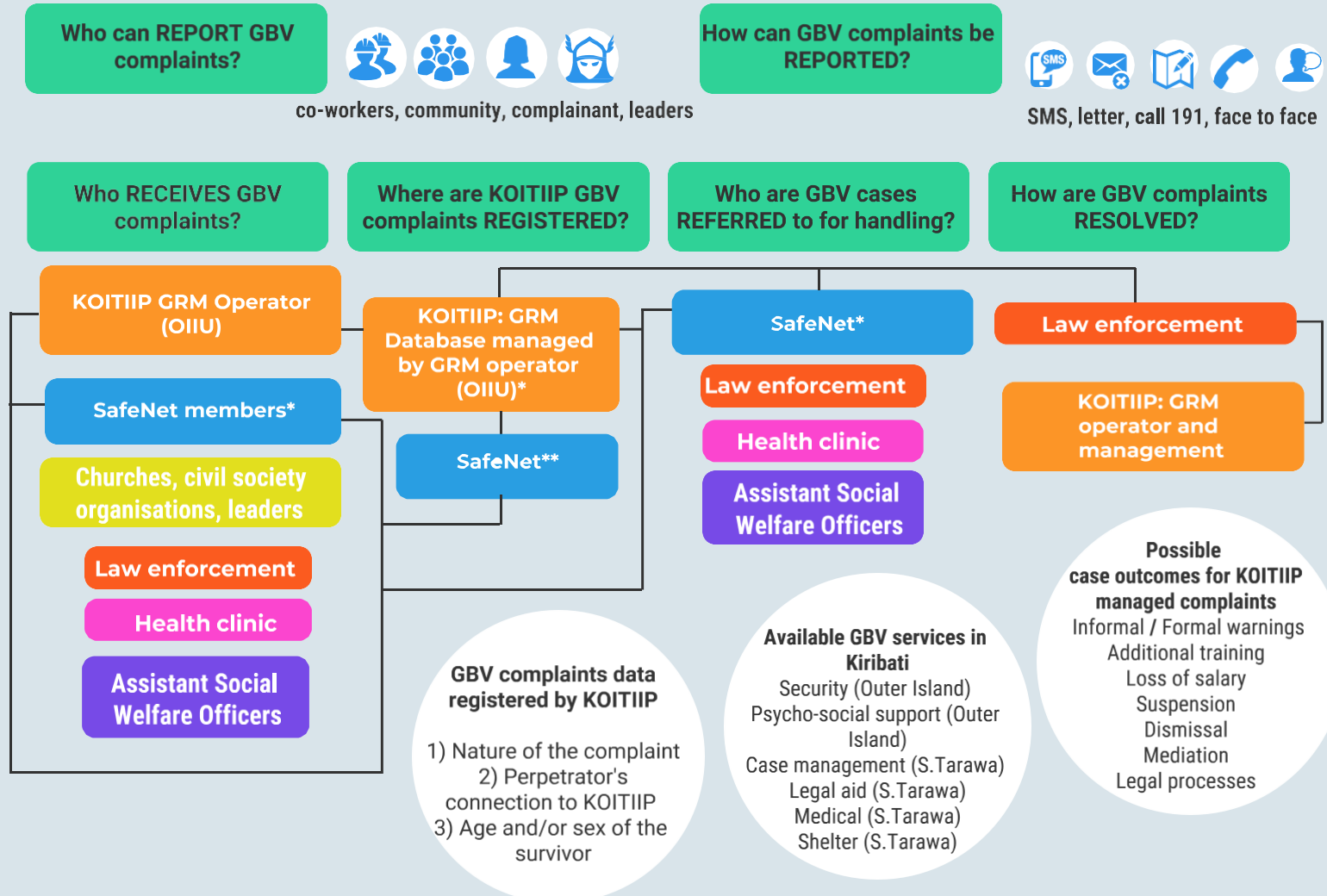
- Include number of open cases.
- Number of cases handled.
- Time taken to handle cases

An assessment on the effectiveness of the GRM will be conducted as part of the mid-term review or end of project evaluation.

The costs associated with operating the GRM are modest and will be financed by the project as part of the general project management costs. Additional costs for training, awareness raising and survivor support fund have been budgeted.

Temporary evacuation to Tarawa is necessary for serious cases of GBV due to the absence of services in outer islands. The security and safety of the survivor will be considered when moving survivors from their homes

KOITIIP Grievance Redress Mechanism for Gender Based Violence (GRM GBV)



* Records quantitative data on number of complaints, nature of complaint and resolution of complaints.

**In outer islands where the SafeNet is not established, Assistant Social Welfare Officers receive, register and refer complaints.

Gender Based Violence Response and Prevention Mapping Kiribati

GBV Service Provider	Type of GBV intervention								24 hour Help line
	Prevention & awareness	Complaints receiving	Case management	Health services	Psycho-social	Security	Legal services	Shelter	
Outer island police units		X				X			
Kiribati Family Health Association		X	X	X	X				
Ministry of health and outer islands health clinics	X	X		X					
Catholic crisis centre		X						X	
Ministry of Women, Youth and Social Affairs (Assistant Social Workers in Outer Islands)	X	X			X				
Kiribati Women Child Support Centre		X			X		X	X	X
Availability of service in KOITIIP project sites	X	X			X	X			X

The SafeNet Committee has been established in Abaiang but not in Beru, Nonouti and Tab. South. Health centres on outer islands are not well equipped. They do not have Post Exposure Preventative treatment starter kits. All serious health issues must be treated in Tarawa.

Draft Code of Conduct to address Gender Based Violence

Instructions

This Code of Conduct sets out the norms and regulations of behavior for all personnel involved in the KOITIIP. It is designed to mitigate risks associated with: sexual harassment, gender based violence, sexual exploitation and abuse and illicit behavior and crime.

All staff and contractors with a physical presence at the project site (including day laborers) need to:

- *receive a copy of the code;*
- *have the code explained to them to ensure requirements are clearly understood by those signing;*
- *acknowledge that adherence to this Code of Conduct is a condition of their employment; and*
- *understand that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.*

A copy of the code (with visual illustrations) shall be displayed in a location easily accessible to the community and project affected people. It shall be provided in languages comprehensible to the local community, Contractor's Personnel, Employer's Personnel and affected persons. Training and consultations on the code will be conducted regularly for the life of the project.

This Code of Conduct is aligned with National and International gender equality commitments as agreed by the government of Kiribati:

- National Gender Equality and Women's Development (GEWD) Policy (2017)
- National Approach to Eliminating Sexual and Gender Based Violence (ESGBV) Policy and Action Plan 2011-2021
- The Kiribati Occupational Health Safety and Welfare Act 2015
- Ministry of Labor Gender Access and Equality Plan (2010)
- Convention on the Elimination of All forms of Discrimination Against Women (CEDAW) to which Kiribati is a signatory.

This Code of Conduct covers the commitment of the company, and the responsibilities of managers and individuals with regard to providing a safe work environment for men and women.

The company will provide separate toilets for men and women at the project sites. Toilets and locker rooms will be lockable from the inside and be well lit.

The company has zero tolerance for gender-based violence. Gender based violence includes:

- Sexual harassment defined as unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature in or around the project site);
- Sexual exploitation and abuse such as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual abuse is

further defined as “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

- Sexual activity/contact with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense.
- Or any acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion, and deprivation of liberty.

The company will provide training for all staff (including day laborers) to better understand workplace violence.

The project has established a Grievance Redress Mechanism to register, refer and resolve any complaints related to gender-based violence and breaches to the Code of Conduct. All complaints of gender-based violence will be acted upon and will be handled by the KOITIIP OIU and the Government of Kiribati SafeNet referral system for gender-based violence.

It is a requirement of this Code of Conduct that all breaches must be reported. Failure to report may also result in disciplinary measures.

Any breach of the code of conduct may result in:

1. Informal warning;
2. Formal warning;
3. Additional training;
4. Loss of salary;
5. Suspension of employment (either administrative leave as above or without payment of salary), for a minimum period of 1 month up to a maximum of 6 months;
6. Termination of employment; and/or,
7. Referral to the police or other authorities as warranted.

Annex 3 Summary of environmental and social legislation

Summary Table of main legislation affecting environmental and social aspects of KOITIIP

Environmental / Social Policy / Act / Legislation	Agency with Primary Responsibility	Responsible Ministry	Status of Legislation	Comment
Foreshore and Land Reclamation Ordinance (Cap. 35 1977)*	LMD	MELAD	In force	
Foreshore and Land Reclamation Ordinance (Cap. 35 1977)	LMD	MELAD	In force	Terms related to colonial period were changed. The time of when the changes are made is not specified.
Foreshore and Land Reclamation (Amendment) Act 2005	LMD	MELAD	In force	New terms and definitions were added to Section 2 and Section 4 was amended to strengthen the recognition of customary rights over the foreshore of our lands.
Environment Act 1999	ECD	MELAD	Part not amended is still In force	
Environment Regulation 2001	ECD	MELAD	Repealed	
Environment (Amendment) Act 2007	ECD	MELAD	In force	Improve the original Act and contain provisions necessary for the implementation of international conventions. Establish a new position of Principal Environment Officer as the administrator of the Act. The EPO is the Secretary of MELAD.
Environment (General) Regulation 2017	ECD	MELAD	In force	Regulations to support Section 86 of the Environment (Amendment) Act 2007.
Guide for Carrying Out a Public Consultation when Preparing an EIA Report	Proponent	Proponent	In force	Guideline for the proponent to follow
Guide for EIA Report Publication/Public Display	Proponent	Proponent	In force	Guideline for the proponent to follow
Wildlife Conservation Ordinance	ECD	MELAD	In force	
Kiribati constitution (1979) residences on the project islands,	Government	All land in the Gilbert Islands belongs to the I-Kiribati people	In force	Government has leased land to establish Island Council offices etc. on the project islands.
Local Government Act 1984 (amended 1985,1987,1989,1992,1994,19	Island Councils, Betio Town Council,	Ministry of Internal Affairs	In force	empowers local government bodies to issue bylaws relating to environmental

Environmental / Social Policy / Act / Legislation	Agency with Primary Responsibility	Responsible Ministry	Status of Legislation	Comment
95,2006,2008,2013, 2018)	Teinainano Urban Council			protection
Penal Code (Cap 76 1977) (amended 1980,1984,1999,2001)	Kiribati Police Services	Office of Te Beretitenti	In force	Has element to protect the environment
Fisheries Act 2010 (amended 2015,2017)	Fisheries Department	Ministry of Fisheries and Marine Resources Development	In force	Protect the fish stock and marine environment of Kiribati
Land Planning Ordinance 1972 (amended 1973, 1974, 1977, 1979, 1980 (2), 2000)	Lands Department	MELAD	In force	Controls land use and developments within designated areas
State Acquisition of Lands Ordinance 1954 (rev 1979).				Empowers the Minister on behalf of the Republic to resume lands required for any public purpose, (compensation as may be agreed)
The State Lands Act 2001				Empowers the State, as land owner to make land available for development purposes including for the permanent settlement of citizens and their families.
Native Lands Ordinance Cap 61 (1956) and Native Land Act 2011.				Provides for leases 'native land' as land owned by any aboriginal inhabitant or descendant.
The Land Registration Grievance Tribunal Act 2002				Tribunal established to hear complaints by descendants of persons who were by mistake or fraud deleted or denied entry on a land registry.
Government Approved Compensation Rate for Trees, Crops and Buildings is				Sets current compensation rates for trees, crops and building structures approved by Cabinet.
Health and Safety Act			In force	
Occupational Health and Safety Act 2015		Min Labour & Human Resources Development		Framework for Occupational Safety and Health sets the country's first comprehensive framework for workplace occupational safety and health standards.

Annex 4 Generic Environmental Management Plan Matrix

Environmental and Social Management and Monitoring Plan Matrix of Mitigation Measures

IMPACT MITIGATION					IMPACT MONITORING		
Project activities	Environmental and Social Impact	Mitigation measures to be included in EMP	Mitigation Responsibility	Mitigation Cost (US\$)	Parameter to be monitored	Frequency and means of verification	Monitoring Responsibility
PRE-CONSTRUCTION PHASE							
Hydrographic Studies	Risk to maritime safety if hydrographical information is not integrated into designs for coastal facilities including possible changes in seal level rise. Identification if dredging is required.	Ensure all recommendation from hydrographic studies are taken forward to detailed designs. Identify in advance locations and scale of necessary dredging for maritime access. Ensure designs additional structures and gabions are built to withstand increased inundation from sea level changes and additional rainfall. Determine and estimate any changes to coastal processes from dredging and any associated advantages and risks to maritime operations.	OIIU – and design Consultant	Included in Contract (IIC)	Hydrographic information integrated into designs.	Check completed design specifications	KFSU / IA ADB-WB check
Safety at Sea (also applies to construction and operational phase)	Loss of life or injuries at sea	Vessels used for mobilization to the outer islands or for on-water work associated with KOITIIP (e.g. dredging, surveying, Aids to Navigation installation), to be in a condition of current survey as required by the national Safety Regulator (MICT) for a vessel of it's size and area of operation. Vessels shall be suitably equipped with safety and communications equipment, and operated by qualified crew. Non-crew personnel on vessels also have individual responsibilities for safety, and should follow MICT rules and the guidelines in the Marine/Sea Safety Guidelines and Standard Operating Procedures for United Nations Pacific Islands (United Nations – Standard Operating Procedures 080716 – April 2019).	OIIU –design Consultant - all contractors and maritime operatives and passengers.	Included in Contract (IIC)	Maritime safety integrated into CESMP.	Check awareness training includes maritime issues	KFSU / IA ADB-WB check
Detailed design activities	Detailed designs encroach on holy land or holy trees and shrubs	Where villagers have identified spirit trees or holy plants or assemblages of vegetation that harbor holy spirits, these those trees will be avoided in the detailed design	OIIU –design Consultant - all contractors and maritime operatives and passengers.	Included in Contract (IIC)	Avoidance of holy land, trees or shrubs integrated into designs and CESMP.	Check awareness training includes maritime issues	KFSU / IA ADB-WB check

IMPACT MITIGATION					IMPACT MONITORING		
Project activities	Environmental and Social Impact	Mitigation measures to be included in EMP	Mitigation Responsibility	Mitigation Cost (US\$)	Parameter to be monitored	Frequency and means of verification	Monitoring Responsibility
Climate change adaptation	Risk of increased inundation and erosion by from seal level rise. Risk of additional rainfall.	Ensure all mitigation measures incorporated in detailed design are implemented. Ensure additional structures and gabions are built to withstand increased inundation from sea level changes and additional rainfall	OIIU – and design Consultant / contractor	Included in Contract (IIC)	Designs and works implemented	Check completed design specifications	KFSU / IA ADB-WB check
Land acquisition Resettlement and Compensation	All land needed to be agreed in advance. Relocation of facilities Crops affected	Propose government land for preference to avoid native land and land with homes. In locations where government land is not available use private land (e.g. for marine facility or passenger shelter) negotiate new lease agreements, preferably voluntary lease agreement with the landowners. Relocate any Island Council owned bush toilets or other council property for construction of the marine facilities Provide compensation for few coconut trees	OIIU – and design Consultant	OIIU Budget	Leases agreed, Relocation completed and Compensation paid	Prior to signing of contract for construction.	KFSU / IA ADB-WB check
Gender Actions	Anticipated participation of women in project activities is not realised	Ensure all mitigation measures in Gender Assessment and Gender Based Violence Framework (GBVF) are operationalized before construction contracts are signed.	OIIU – IAs	OIIU Budget	Gender Assessment and GBVF are operationalized	Prior to signing of contract for construction.	KFSU / IA ADB-WB check
Environmental License application and clearance for project	Project complies with donor bank and KIR legal requirements.	Project implementation packages requiring separate EIAs agreed with MELAD. Implementing ministries/agencies include a line budget item for the environment license in project budget. Consultants with EIA experience in KIR / Region engaged. EIA(s) completed in first two years of project based on detailed design, location and scale.	OIIU Consultant &	OIIU Budget	EIA prepared and environmental license obtained	Check clearance with MELAD before signing of contract for construction.	KFSU / IA ADB-WB check
Dredging planning	Uncontrolled or mitigated dredging will cause unacceptable modification of coastal processes.	Dredging to follow detailed designs and recommendation from hydrographic studies. Assessment of dredging impacts and result showing acceptable modification of coastal processes included in detailed designs. Identify in advance locations and scale of necessary dredging for maritime access. Dredging plan to be included in CESMP including but not limited to: <ul style="list-style-type: none"> Analysis of need and justification for dredging 	OIIU Contractor &	OIIU Budget	Separate / Amended EIA prepared if required and environmental and foreshore licenses obtained	Check clearance with MELAD and Chief Lands Officer before commencement of construction	KFSU / IA ADB-WB check

IMPACT MITIGATION					IMPACT MONITORING		
Project activities	Environmental and Social Impact	Mitigation measures to be included in EMP	Mitigation Responsibility	Mitigation Cost (US\$)	Parameter to be monitored	Frequency and means of verification	Monitoring Responsibility
		<ul style="list-style-type: none"> Assessment of dredging impacts and result showing acceptable modification of coastal processes included in detailed designs. Original and proposed final contours Location, area, quantities and rates of extraction Reuse options on land and locations and methods for stockpiling Environmental impacts of dredging Ecosystem functions and fisheries affected Management plan for extraction 					
Construction material sources; identification and environmental clearance	Project complies with donor bank requirements, best practice and material suppliers are fit for purpose.	<p>Follow provisions of Foreshore and Land Reclamation (Amendment) Act 2005 and obtain mining license as necessary; preferably in pre-construction phase.</p> <p>OIIU checks locations for material supplies are acceptable to local community and that necessary compensation is arranged if necessary.</p> <p>OIIU checks locations included in EIA for project or separate EIA is processed for alternative locations proposed by Contractor in the CESMP</p> <p>Considering the risks of sourcing aggregates from the foreshore areas, the replenishment of sand and gravel at the foreshore area are uncertain. Consequently, coastal process studies are crucial for understanding aggregate dynamics and guiding the preparation of a C-ESMP to ensure sustainable mining practices.</p>	OIIU & Contractor	OIIU Budget	Separate / Amended EIA prepared and environmental license obtained	Check clearance with MELAD and Chief Lands Officer before commencement of construction	KFSU / IA ADB-WB check
Contractor EMP (CESMP) prepared Awareness and orientation of Contractor	All foreseeable impacts captured in CESMP.	<p>The following sections or method statements shall be included in the CESMP based on the generic EMP in the IEE and the CESMP shall be prepared by the Contractor in the preconstruction stage for approval and endorsement by OIIU and implementation by the Contractor:</p> <ol style="list-style-type: none"> Water supply for works, workers and water conservation measures; Waste Disposal (covering spoil disposal, general waste and hazardous waste); Clearances for legitimate suppliers of construction materials and management; 	ZOIIU oversees / assists Contractor to compile CESMP based on the EMP in the IEE and the CESMP shall be prepared by the Contractor assisted by ZOIIU	IIC	CESMP prepared and endorsed	Review inspection of CESMP	OIIU /ADB Check

	<ul style="list-style-type: none">iv. Dredging plan (if required for maritime works)v. Groundwater contamination prevention;vi. Dust and noise minimization;vii. Construction camp operations, sanitation and diseases;viii. Power provision & utilities protection;ix. Safety precautions - workers and public;	as necessary.				
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IMPACT MITIGATION					IMPACT MONITORING		
Project activities	Environmental and Social Impact	Mitigation measures to be included in EMP	Mitigation Responsibility	Mitigation Cost (US\$)	Parameter to be monitored	Frequency and means of verification	Monitoring Responsibility
		<ul style="list-style-type: none"> x. Accidental discovery of archaeological assets, sites or resources; and xi. Rehabilitation, revegetation and re-contouring of construction areas to facilitate erosion control. xii. Enhancement planting for surface stabilization. xiii. Abstraction from water resources may be permitted after prior approval from OIIU in consultation with local suco leaders and local authorities. 					
Surveying and demarcation	Minor loss of vegetation during demarcation	<ul style="list-style-type: none"> • Vegetation clearance will be minimized and replanting for erosion control will be encouraged / required; • Construction workers informed about general environmental protection and the need to avoid unnecessary environmental pollution and how to follow environmental requirements. 	OIIU Consultant & Contractor	OIIU Budget IIC	Only agreed trees are felled/vegetation removed	During survey and activities - visual inspection before, during and after	Contractor; OIIU
Site clearance and excavations	Accidental discovery of PCR or cultural property sites	<ul style="list-style-type: none"> • Site agents instructed to keep a watching brief for relics / PCR in excavations. • Sacred sites and trees /vegetation identified in consultation with local community / island council to be marked off and contractors and workers instructed not to disturb the site. • Should any potential items be located, the local Mayor and OIIU will immediately be contacted and work will be temporarily stopped in that area. • The OIIU will determine if that item is of potential significance with the assistance of the local council and pass the information to the relevant department in GOK who will be invited to inspect the site and work will be stopped to allow time for inspection if necessary. 	Contractor	IIC	Sites, relics and/or resources discovered and protected	During activities - stop work order issued; - site/resources dealt with appropriately	OIIU / IA
Mobilisation of contractor, presence of construction workers, establishment of camp, associations with local people. At this stage, the contractor has selected potential areas they preferred to become their campsite and laydown areas. As such, the laydown areas are being secured for the project	Social disruption	<ul style="list-style-type: none"> • Island Council protocols discussed with workers as part of awareness and mobilization training; • The contractor will ensure that workers' actions outside work area and contractor camp are controlled and Island Council's expected codes of conduct are observed at all times; • Including code of conduct on Gender Based Violence • The contractor will identify one member of their staff to be the liaison with the Island Council and OIIU; • Worker camp location and facilities will be agreed with local Island Council and communities and ideally be located as far as possible (at least 500m) from settlements and with facilities approved by OIIU and managed to minimize impacts; • Adequate signage and security provided at the site offices and works yard and prevention of unauthorized people 	OIIU, Contractor & Liaison Officer and Island Council through liaison	IIC	Complaints of incidents between workers and villagers; No. of children entering camp; Number and	During activities - checking records for complaints Consultation with workers about protocols.	OIIU

<p>through voluntary land acquisition, and the corresponding mitigation measures will therefore be maintained.</p> <p>measures are therefore</p>					<p>effectiveness of signs</p>	<p>Check entries and resolutions</p>	<p>GRM and</p>
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IMPACT MITIGATION					IMPACT MONITORING		
Project activities	Environmental and Social Impact	Mitigation measures to be included in EMP	Mitigation Responsibility	Mitigation Cost (US\$)	Parameter to be monitored	Frequency and means of verification	Monitoring Responsibility
		<p>(especially children) entering the working areas;</p> <ul style="list-style-type: none"> Hire and train as many local workers as possible by using labour from local island as the work proceeds; Hire and train as many women as possible in line with accepted Gender Action Plan target. 					
	Health & safety	<ul style="list-style-type: none"> Provide adequate accommodation for all workers at the construction camps and establish clean canteen / cooking and eating areas; Construction camp(s) will be established in areas with adequate drainage and be connected to a septic tank in order to facilitate disposal of effluents and avoid contamination of underground water; Potable water, clean water for washing, hygienic sanitation facilities/toilets with sufficient washing water, worker rest area and first aid facilities will be provided. Separate toilets shall be provided for male and female workers; Portable lavatories (or at least pit latrines in remote areas) shall be installed as temporary measure where necessary and open defecation shall be prohibited and use of lavatories encouraged by cleaning lavatories daily and by keeping lavatory facilities clean at all times; Wastewater effluent from contractors' workshops and equipment washing-yards will be passed through gravel/sand beds and all oil/grease contaminants will be removed before collection for safe disposal. Oil and grease residues shall be stored in drums awaiting disposal in line with the agreed waste management section of the CESMP; Predictable wastewater effluent discharges from construction and operational activities shall have the necessary permits from OIU, MELAD and local authorities before the works commence; Solid and liquid wastes will be disposed as agreed with MELAD and Island Council and managed in line with the provisions of the waste management section of the CESMP; Use of guns and hunting equipment by workers will be banned and workers will be dismissed for hunting or being in possession of wildlife; Provision of adequate protection to the general public in the vicinity of the site, including advance notice of commencement of works to island Council and communities, installing safety barriers and signage marking the work areas; Provision of safe access across the works site (particularly across essential causeways and during any excavations) to people whose village and school access are temporarily 	Contractor	IIC	Camp, yard, and immediate surrounding areas	Quarterly / monthly observation & consultation	OIU

IMPACT MITIGATION					IMPACT MONITORING		
Project activities	Environmental and Social Impact	Mitigation measures to be included in EMP	Mitigation Responsibility	Mitigation Cost (US\$)	Parameter to be monitored	Frequency and means of verification	Monitoring Responsibility
		<p>affected during construction works;</p> <ul style="list-style-type: none"> At all times workers should respect village and land owner’s boundaries and recognize and follow Island Council and village rules and terms of conduct, including those addressing women and elders and the code of conduct under the GBVF; Land used for campsites shall be restored to the original condition as far as practicable and cleaned to the satisfaction of the Island Council and OIIU after use. Activity specific risk assessments completed defining appropriate mitigation measures and PPE that must be used. 					
	Spread of communicable diseases	<ul style="list-style-type: none"> Construction camp(s) (if required) will be established in areas with adequate drainage in order to prevent formation of breeding sites for mosquitoes; Implement HIV/AIDS/STIs awareness and prevention for the contractor’s workers and adjacent communities; Implement the Gender Based Violence Framework Promulgate the Code of Conduct from and the gender based GRM from GBVF with contractor’s workers and adjacent communities; 	Contractor & Approved service provider	To be Advised (TBA)	<p>Increased awareness about transmission and prevention of STI/HIV/AIDS</p> <p>Increased awareness about GBV, prevention and Code of Conduct</p> <p>Incidents of GBV on projects and in villages (if reported)</p>	Prior to construction - check contractor records, consultation with employees, discussions with NGO	OIIU
CONSTRUCTION PHASE							
Construction plant and vehicles generating emissions	<p>Emission of exhaust from vehicles and machinery;</p> <p>Dust from aggregate crushing plant; generated by heavy vehicles transporting materials on roads; Uncovered loads on trucks;</p> <p>Dust from exposed stockpiles</p>	<ul style="list-style-type: none"> Construction plant being maintained to a good standard, checked to ensure in working order as part of environmental monitoring; Prevent use of equipment and machinery that causes excessive pollution (i.e. visible smoke) at the project site; Material stockpiles located in sheltered areas and covered with tarpaulins or other suitable covering to prevent material becoming airborne and runoff of fine particles; and Ensure vehicles transporting potentially dust-producing material not overloaded, are provided with adequate tail-boards and side-boards, and are adequately covered with a tarpaulin (covering the entire load and secured at the front, sides and tail of the vehicle) during transportation. 	Contractor	IIC	<p>Air quality. No dark smoke or particulate matter;</p> <p>Use of tarpaulins and loading of vehicles;</p> <p>Stockpiles covered</p>	<p>Monthly or after complaint - periodic visual inspection;</p> <p>Any particulate matter and smoke managed as per CESMP</p>	Contractor; OIIU
Construction work requiring water supply	Demands on local water supplies tapped to meet campsite and construction requirements, bringing project based water use in	<ul style="list-style-type: none"> Prior to construction the CESMP will include a water use and conservation plan identifying and quantifying planned water use, water reuse options and possible end uses for watering vegetation etc.; Watching brief kept on contractors by OIIU to ensure water 	Contractor	IIC	Use of water in line with conservation plan	Monthly or after complaint - periodic inspection;	Contractor; OIIU

IMPACT MITIGATION					IMPACT MONITORING		
Project activities	Environmental and Social Impact	Mitigation measures to be included in EMP	Mitigation Responsibility	Mitigation Cost (US\$)	Parameter to be monitored	Frequency and means of verification	Monitoring Responsibility
	competition with local use; Water is not used carefully or is wasted.	conservation measures are followed.				Signs of water being wasted and not managed as per CESMP	
• Dredging	Uncontrolled dredging causes sedimentation and impacts to coastal waters	<ul style="list-style-type: none"> Undertake dredging at areas shown in the approved EIA report as authorized by MELAD. Use the clamshell grabs with the appropriate bucket for dredging to reduce any spill of sediment-laden water during the activity and dredge aggregates with a lower proportion of fine sediment to minimize the plume impact. Water collected on the dredging vessel as a result of loading dredged material, shall be re-piped to the seabed for disposal within the dredging area. No significant amounts of sediment to be outwashed or overflow from the dredging vessel due to wave action, on-board processing of material or transportation. Clamshell activity of the dredging vessel shall NOT exceed 5 hours typically) per operational cycle/trip. Follow specified limits on turbidity and limit dispersal to an area of less than 100m diameter from the point of dredging. Excessive turbidity shall be followed by cessation of dredging and immediate actions to reduce turbidity, contain the dispersion and re-commencement of dredging shall only be after the sedimentation has settled. The License Holder shall follow the recommended rotational dredging schedule/plan in specified areas included in the approved dredging plan. Dredging activity shall NOT be carried out when wind speed exceeds 20 knots. Dredging shall not interfere with passage of fishing boats or boats to and from the lagoon or to and from jetties. NO hazardous materials, hydrocarbon, including oil, bilge oil and solid waste is discharged into the sea from the dredging vessel. 	Contractor	IIC	Use of water in line with conservation plan	Monthly or after complaint - periodic inspection; Signs of water being wasted and not managed as per CESMP	OIIU, MELAD
Sourcing of materials (beach sand, aggregates and boulders for gabions etc.)	Extraction of sand and aggregates from beaches or active channels between islets changes coastal processes, hydrology, altering channel & causing erosion;	<ul style="list-style-type: none"> Follow provisions of Foreshore and Land Reclamation (Amendment) Act and Environment Act and obtain mining license and environmental before extraction (preferably completed in pre-construction phase). Before mining activities begin, the contractor is required to prepare a C-ESMP, which must be reviewed and receive either approval or a no-objection from WB and ADB. Coastal process studies also need to be undertaken to determine the wave replenishment and the sustainable quantities of aggregates that can be sourced from the designated sites. 	MPW, Contractor, OIIU	IIC	Materials only obtained from designated sites (locations and method) as per extraction plan; Rehabilitation is conducted as per	Monthly - visual inspection; Review of extraction plan; Re-vegetation and rehabilitation	Contractor; OIIU

		<ul style="list-style-type: none">• Extract materials only to depth and in areas as specified in the environmental license and mining license.• Use borrow area close to the causeways, with easy					
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IMPACT MITIGATION					IMPACT MONITORING		
Project activities	Environmental and Social Impact	Mitigation measures to be included in EMP	Mitigation Responsibility	Mitigation Cost (US\$)	Parameter to be monitored	Frequency and means of verification	Monitoring Responsibility
	<p>Extraction from inland area or borrow pits leaves unusable land, exposing water lens/table, attracts rubbish dumping, reduces visual values.</p> <p><i>(Impacts will be minimised if aggregates are sourced from outside Kiribati, e.g Fiji as with recent road project in Tarawa).</i></p>	<p>access;</p> <ul style="list-style-type: none"> Replace unusable surplus construction materials at each location; Ensure borrow area are left in a tidy state with stable side slopes and proper drainage in order to avoid creation of water bodies favorable for mosquito breeding; Prevent accidental access and avoid drowning when pits become water-filled by implementing measures such as fencing, providing flotation devices such as a buoy tied to a rope, and backfill as soon as practicable; Additional extraction sites and/or borrow pits will not be opened without the restoration of those areas no longer in use; Decommissioning of all accommodation, plant and construction materials processing areas will include removal of all residual contamination, waste, machinery and constructed facilities. Decommissioning plan will be included in the CESMP covering rehabilitation, revegetation and recontouring of quarries, borrow areas and construction materials processing areas. 			extraction plan		
Run-off, discharges, generation of liquid wastes	<p>Impacts on water quality;</p> <p>Increased siltation at culverts and bridges;</p> <p>Construction materials washed out into rivers</p>	<ul style="list-style-type: none"> Lubricants will be stored in covered containers / dedicated enclosures with a sealed floor >50m from water bodies; Fuel and other hydro-carbons, and other chemicals required for the works, will be stored in secure containers or tanks located in dedicated areas with a sealed floor >50m from water bodies. Any spills will be contained and immediately cleaned up with absorbent materials with residuals stored in drums awaiting disposal); Stockpile areas and storage areas for hazardous substances shall be located away from water bodies; Washing of machinery and vehicles in surface waters shall be prohibited; Diversion ditches will be dug around material stockpiles to catch runoff; Solid wastes, debris, spent oil or fuel from construction machinery or plant, construction material, or waste vegetation removed from work sites will not be dumped in or near streams, or waterbodies Spoil and material stock piles will not be located near the 	Contractor	IIC	<p>Discharge of waste as per waste management plan;</p> <p>Occurrence of erosion</p>	Monthly - visual inspection of culverts, and in-stream/river work areas	Contractor; OIIU

IMPACT MITIGATION					IMPACT MONITORING		
Project activities	Environmental and Social Impact	Mitigation measures to be included in EMP	Mitigation Responsibility	Mitigation Cost (US\$)	Parameter to be monitored	Frequency and means of verification	Monitoring Responsibility
		coast; and <ul style="list-style-type: none"> All water, waste-water and other liquids shall be disposed of after treatment in line with the Environmental License. 					
General activities - solid and liquid waste generation	Uncontrolled and un-managed waste disposal impact soil, ground and surface water quality	<ul style="list-style-type: none"> Contractor's CESMP to include section on waste disposal, recycling and re-use of materials from the project; Construction/workers' camps (if required) to be provided with waste bins and waste disposed of to a licensed location; Areas for disposal to be agreed with local authorities and checked and recorded and monitored by the OIIU; Segregation of wastes shall be observed. Cleared foliage, shrubs and grasses may be given to local farmers for fodder and fuel including organic (biodegradables) collected for composting; Burning of construction and domestic wastes associated with the project shall be prohibited; Residual general wastes shall be disposed of in disposal sites approved by Local Council; Waste disposal areas approved by local authorities shall be rehabilitated, monitored, catalogued, and marked if required. 	Contractor	IIC	Waste handling as per waste disposal plan, recycling and adequate rehabilitation work at disposal sites.	Monthly; visual inspection of work and disposal sites	Contractor, OIIU
Encroachment into precious ecology, disturbance of marine and terrestrial habitats, effects on flora and fauna	Impacts on terrestrial habitats; Workers poach animals for food or feathers etc; Protected or sensitive areas affected	<ul style="list-style-type: none"> Invasive species shall not be introduced. Contractor's site office, work yard, rock crushers, material storage, borrow pits, and quarries will be located in open areas avoiding trees and approved by OIIU and Local Council; not permitted in any ecologically important sites or areas valuable for conservation; Vegetation clearance will be minimized and no greater than the absolute minimum in line with the detailed designs; Under no circumstances is the contractor permitted to fell or remove mangroves, coconut trees or other vegetation unless specified in the detailed designs and approved by OIIU and Local Council; Contractors will not cut any trees within or outside the project at the request of the local land owners or Island Council unless specified in the detailed designs without prior approval from OIIU; Where villagers have identified holy plants and assemblages of vegetation that harbor holy spirits, these will be avoided in the detailed design; Contract documents and technical specifications will include clauses expressly prohibiting the felling of trees, not requiring to be cleared by the project, by construction workers for the term of the project; The contractor will be responsible for providing adequate knowledge to construction workers in respect of fauna. 	Contractor	Including in Contract (IIC)	Check for poaching and unnecessary vegetation clearance; Progress of re-vegetation of work areas; Adequate fuel supplies in camp; Training of workers in information related to sensitive habitats and flora/fauna in the area.	Spot inspections; monthly - visual inspection of camp and work sites; Re-vegetation activities as per EMP; Consultations with villagers and workers	Contractor; OIIU

IMPACT MITIGATION					IMPACT MONITORING		
Project activities	Environmental and Social Impact	Mitigation measures to be included in EMP	Mitigation Responsibility	Mitigation Cost (US\$)	Parameter to be monitored	Frequency and means of verification	Monitoring Responsibility
		<p>Contract documents and technical specifications will include clauses expressly prohibiting the poaching of fauna by construction workers and making the contractor responsible for imposing sanctions on any workers who are caught trapping, killing, poaching, or being in possession of or having poached fauna;</p> <ul style="list-style-type: none"> The OIIU will supervise and monitor a ban on use of forest and mangrove timber and workers shall be prohibited from cutting trees and mangroves for firewood; and Construction workers will be informed about general environmental protection and the need to avoid unnecessary felling of trees unless justified on engineering grounds and approved by OIIU. 					
Accidental encroachment into historical / cultural sites	Impacts on PCR or cultural property sites	<ul style="list-style-type: none"> Contractor's CESMP to include section on "chance finds" Site agents will be instructed to keep a watching brief for relics in excavations. Sacred sites and trees /vegetation identified in consultation with local community / island council be marked off and contractors and workers instructed not to disturb the site. Should any potential items be located, the OIIU will immediately be contacted and work will be temporarily stopped in that area. The contractor with the assistance of the OIIU will determine if that item is of potential significance and contact MPW to pass the information to the relevant department in GOK (i.e. Secretary of State for Culture) who will be invited to inspect the site and work will be stopped to allow time for inspection. 	Contractor;	IIC	Sites and/or resources discovered and the protection measures being put in place	During activities - stop work order issued; - site/resources dealt with appropriately	OIIU
Operation of construction plant and equipment creating noise	Noise in community; Impacts on construction workers	<ul style="list-style-type: none"> Aggregate graders and crushers (if required) to be located at least 500m from sensitive receivers. Requirements in the ESMP and contract documents that all vehicle exhaust systems and noise generating equipment be acoustically insulated and maintained in good working order and that regular equipment maintenance will be undertaken; The contractor will prepare a schedule for timing of operations that will be approved by Island Council and OIIU. The schedule will establish the days, including identifying days on which there should be no work, and hours of work for each construction activity and identify the types of equipment to be used; Workers will be provided with ear defenders and noise abatement equipment or noise barriers as may be required; and Any complaints regarding noise will be dealt with by the 	Contractor	IIC	Adherence to agreed schedule; Complaints (no. logged with resolution); Workers safety equipment	Monthly or after complaint - review schedule Consultation (ensure schedule being adhered to) GRM register	Contractor; OIIU

IMPACT MITIGATION					IMPACT MONITORING		
Project activities	Environmental and Social Impact	Mitigation measures to be included in EMP	Mitigation Responsibility	Mitigation Cost (US\$)	Parameter to be monitored	Frequency and means of verification	Monitoring Responsibility
		contractor via the Island Council in the first instance through the GRM.					
Maintaining access via causeways and in villages, use of people's land for access to construction site, traffic and safety issues	Traffic and access disrupted during construction; Traffic safety affected	<ul style="list-style-type: none"> The contractor will prepare, and submit to OIIU, a traffic management plan detailing diversions and management measures for work on causeways; Signs and other appropriate safety features will be used to indicate construction works are being undertaken; Contract clause specifying that care must be taken during the construction period to ensure that disruptions to pedestrian access and school vehicle traffic are minimized and that access to villages either side of the causeways is maintained at all times; Island Councils and village officials will be consulted in the event that access to a village has to be disrupted for any short periods of time and temporary access arrangements made; Construction vehicles will use local access roads, or negotiate access with land owners, rather than drive across vegetation or agricultural land, to obtain access to material extraction sites. Where local roads are used, they will be reinstated to their original condition after the completion of work; The road will kept free of debris, spoil, and any other material at all times; Disposal sites and haul routes will be identified and coordinated with local Island Council officials; Provision of adequate protection to the general public in the vicinity of the work sites, including advance notice of commencement of works, installing safety barriers if required by villagers, and signage or marking of the work areas; and Provision of safe access across the works site to people whose villages and access are temporarily affected during causeway repair activities. 	Contractor, SUCOS	IIC	No. of accidents or events; Maintenance of access; Signage; Road free of materials and debris; Haulage routes rehabilitated	During activities - Visual inspection; Consultations; Review of traffic management plan	Contractor; OIIU
General activities, handling equipment and plant; construction vehicles	Worker health and safety risks	<ul style="list-style-type: none"> At least one month before construction commences the contractors will demonstrate to the OIIU they are properly resourced and a delegated environment and safety officer (ESO) will be identified; Establishment of safety measures as required by law and by good engineering practice and provision of first aid facilities at work sites, in vehicles and establishment of a first aid/health post at the camp; The contractor will conduct training (assisted by OIIU) for all workers on safety and environmental hygiene at no cost to 	Contractor with some assistance from OIIU	IIC	No. and types of trainings conducted, safety measures being established.	Spot inspections; Monthly - visual inspection of camp and work sites; training records, consultation with workers regarding	Contractor; OIIU

IMPACT MITIGATION					IMPACT MONITORING		
Project activities	Environmental and Social Impact	Mitigation measures to be included in EMP	Mitigation Responsibility	Mitigation Cost (US\$)	Parameter to be monitored	Frequency and means of verification	Monitoring Responsibility
		<p>the employees. The contractor will instruct workers in health and safety matters as required by law and by good engineering practice for all operatives before they start work;</p> <ul style="list-style-type: none"> • The contractor and site agents will follow up with toolbox talks on a weekly basis including use of personnel protective equipment (PPE). Workforce training for all workers starting on site will include safety and environmental hygiene; • Workers shall be provided with appropriate PPE such as safety boots, helmets, reflector vest, gloves, protective clothes, dust mask, goggles, and ear protection at no cost to the workers; • Fencing will be installed on all areas of excavation greater than 1m deep and on sides of temporary works; • Reversing signals (visual and audible) shall be installed on all construction vehicles and plant. • Potable water shall be provided (2l /worker / day) in all work locations; • Construction camps (if required) shall be provided with toilets/sanitation facilities to prevent any hazard to public health or contamination of land, surface or groundwater. To ensure these facilities never overflow they shall be well maintained and cleaned regularly to encourage use and allow effective operation and emptied regularly at disposal site approved by OIU and Island Council. • Activity specific risk assessments completed defining appropriate mitigation measures and PPE that must be used. 				trainings.	
Presence of construction workers	Various social impacts including: (i) social disruption; (ii) possibility of conflicts or antagonism between residents and workers; (iii) spread of communicable diseases including STIs and HIV/AIDS; (iv) children are potentially exposed to exploitation; (v) impacts on community health and safety and (vi) Gender based violence.	<ul style="list-style-type: none"> • The contractor will appoint an ESO to act as liaison officer and address social as well as health and safety concerns and liaise with the OIU and Island Councils within the Project area; • Adequate signage and security will be provided to prevent unauthorized people (including children) entering work areas and camp. Warning signs will be provided at the periphery of the site warning the public not to enter; • Drivers will be educated on safe driving practices to minimize accidents and to prevent spill of construction materials during transport; • Measures to prevent proliferation of mosquitoes shall be implemented (e.g., provision of insecticide treated mosquito nets to workers, installation of proper drainage to avoid formation of stagnant water, standing water will not be allowed to accumulate in the temporary drainage facilities or along the roadside); • The contractor will make prior provision to ensure the 	Contractor, Suco Chiefs, OIU; approved service provider	IIC + costs for program (already identified)	HIV/STIs awareness campaign implemented; ESO recruited; Training implemented; Provision of safety equipment; Signage and security to prevent unauthorized people entering camp; Signage installed as	As required; Monthly or after complaint - ESO recruited; Training records; Staff records; Visual inspection; Consultations with villagers; Checking of complaints;	Contractor; OIU;

IMPACT MITIGATION					IMPACT MONITORING		
Project activities	Environmental and Social Impact	Mitigation measures to be included in EMP	Mitigation Responsibility	Mitigation Cost (US\$)	Parameter to be monitored	Frequency and means of verification	Monitoring Responsibility
		<p>construction workforce attends STI and HIV/AIDS prevention workshops provided through an approved service provider. The workshops will be delivered to the contractor's workforce prior to commencement of any civil works and will include gender based violence (GBV) issues and the Code of Conduct;</p> <ul style="list-style-type: none"> Village based community awareness-raising about transmission of STIs and HIV, reproductive health and safe sex and gender based violence, the GBV Framework, Code of Conduct and GRM. The program will be implemented after contractor mobilization and staff are in post but prior to the commencement of civil works. No child labour will be used 			required;	Consultations with workers re: training	
OPERATION PHASE							
Operation of boats and vehicles creating emissions	Hydrocarbons, Carbon Monoxide, Nitrous compounds, Sulphur Dioxide and particulate matter increase through increased marine and land traffic	<ul style="list-style-type: none"> Forecasts of traffic growth and marine movements indicate that emissions will be low and not have a noticeable effect on air quality; Improvement of causeway surfaces to reduce dust impacts 	MISE/routine maintenance contractor	IIC	Air quality; Particulates and smoke; No. complaints; incidents logged with resolution	Quarterly or as required - consultation and visual observations; Complaints;	MISE OIIU
Routine and ongoing maintenance	<p>Constriction of water flows through causeways structures blocking water flow;</p> <p>Non-clearance of branches and other blockages from causeway culverts as part of on-going road maintenance leads to damage of causeway structure;</p> <p>Standing water backs up increases tide levels and degrades surrounding environment</p>	<ul style="list-style-type: none"> Maintenance of structures to ensure debris does not collect and result in damage to culverts, causeway banks, or land through altered flow patterns (see below); MISE will negotiate with island stakeholders and prepare an MOU acceptable to all parties; Periodic check on all (6mnths) causeway culverts of success of ongoing maintenance activities 	MISE/routine maintenance contractor	IIC	Satisfaction with MOUs; Condition of culverts is cleared	As required or as per POM - MOUs; Routine maintenance records; Visual inspection; As per monitoring framework included in PSA	MISE OIIU

IMPACT MITIGATION					IMPACT MONITORING		
Project activities	Environmental and Social Impact	Mitigation measures to be included in EMP	Mitigation Responsibility	Mitigation Cost (US\$)	Parameter to be monitored	Frequency and means of verification	Monitoring Responsibility
Climate change issues	Unexpected and costly failure of causeway;	Climate-change adaptation works implemented to accommodate extreme weather events.	MISE/routine maintenance contractor	IIC	Flooding frequency; Localised erosion	Visual; Review rainfall and flooding records	OIIU, MISE
Causeway rehabilitation	Changes in coastal processes issues	<ul style="list-style-type: none"> Construction works must be confined to the causeway footprint without changing its current direction. An ESIA for the causeway must reflect the exact scope of work and design of each of the causeways to be rehabilitated, and to ensure the mitigation measures for the work are clearly highlighted. 	Contractor		Erosion and Accretion alongside the causeway ESIA review.	Regular monitoring and site checks of eroded and accreted areas close to the causeway Review of the causeway's ESIA	OIIU, MISE
Any other	Unintended or unanticipated impacts	<ul style="list-style-type: none"> As required to avoid or reduce effects or impacts 	DRBFC	TBA	TBA	As above, as required	MPW/DRBFC; ADB

Annex 5 Negative Attributes

Subprojects with any of the attributes listed below will be ineligible for support under the proposed KOITIIP project

A. Environmental Criteria for Selection of Subproject Causeways and Maritime Access

1. While the causeways and maritime access subprojects are yet to be designed in detail it is unlikely that any of the causeway sections or maritime access would need to be excluded on environmental grounds.
2. Subproject causeways and maritime access subprojects are generally expected to be aligned at the existing causeways and around /near to established maritime access routes in which case there are few environmental concerns as the causeway corridors and maritime access routes are already disturbed. If in unexpected circumstances new locations or alignments are required, the following environmental criteria for selecting alignments and locations will be used:
 - Avoid direct or indirect significant, negative impacts on areas protected for their biodiversity such as “Wildlife Protected Areas”, “National Parks”, “fisheries protection areas” or “conservation areas”.
 - Avoid subproject causeways and maritime access work sites that cross areas of primary undisturbed forest or lakes or sea bed. Only sites that have previously been cleared or disturbed are to be accepted.
 - Avoid subproject maritime access work sites that will require substantial dredging sufficient to trigger Category A. Only sites that have previously been dredged or disturbed are to be accepted.
 - Avoid direct or indirect significant, negative impacts on important items of cultural heritage or places of worship.
 - Wherever possible avoid improvements in areas that are currently under human habitation that would occupy land such as gardens or other village facilities, schools and health facilities.
 - Avoid subproject maritime access that will cause dredging or significant disturbance and conversion of the sea bed in areas not previously disturbed.
 - Avoid subproject causeways or maritime access subprojects that will cause other environmental impacts that would trigger categorization as a ‘Category A’ project in accordance with the ADB’s SPS (2009) and the environmental laws of Kiribati. Category A projects will not be approved without clearance from the ADB and World Bank.

B. Social Criteria for Selection of Subproject Causeways

3. The social objectives are to;
 - (i) avoid involuntary resettlement wherever possible; to minimize involuntary resettlement by exploring project and design alternatives; and
 - (ii) to enhance, or at least restore, the livelihoods of all displaced persons in real terms relative to pre-project levels; and to improve the standards of living of the displaced poor and other vulnerable groups.
4. Therefore the following negative social attributes would deem KOITIIP subprojects ineligible under the current social safeguards Category B.
 - (i) Avoid transport infrastructure development that will lead to physical displacement causing loss of residential land, or loss of shelter or the need to relocate
 - (ii) Avoid transport infrastructure that will lead to significant economic displacement (loss of land, assets, access to assets, income sources, or means of livelihoods)
 - (iii) Avoid subprojects that result in involuntary acquisition of land
 - (iv) Avoid subprojects that result in involuntary restrictions on land use or on access to legally designated parks and protected areas.

Annex 6 Checklists Construction Screening Checklist

Name of the Subproject: _____ Screening Date: _____

Locality: _____ Description of the area: _____

Step 1: Categorisation

1.1. Does the subproject contravene any negative attributes in Annex 5?

Step 2: Land Acquisition

1.2. Is the land required government land or private land?

- Government land.** Work with Land Management Division, MELAD to acquire land.
- Private land.** Must be voluntary land donation or private land lease only. Involuntary land acquisition is prohibited. Exclude land with private assets or that needs significant clearance.

Step 3: Environmental Risks

1.3. Will the activity be undertaken within the designated foreshore?

- Yes – obtain the required License from the Chief Lands Officer, Land Management Division, MELAD before you submit any require environment License application to the ECD.
- No

1.4. Check the *Schedule of Environmentally Significant Activities* in the Environment Act General Regulations 2017. Is the activity listed?

- Yes – Download the *Environment License Application Form* from the ECD website. Complete and submit to the ECD.
- No – no further environmental action is required at this stage under Kiribati law. Continue to question 4 to assess World Bank requirements. Await MELAD response.

1.5. Will this activity require clearance of trees, including mangroves, or natural vegetation in excess of half a hectare?

- Yes – Category B
- No

1.6. Will this activity require any clearance of native vegetation?

- Yes – Category B
- No

1.7. Will there be any negative impact on any natural habitats?

- Yes – Category B
- No

1.8. Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora or fauna)?

- Yes – Category B (review if Category A or not)
- No - Category B

1.9. Will there be any significant dredging impacts that could result in classification being Category A sufficient to trigger the 'ineligible activities' and exclusion?

- Yes – Category B (review if Category A or not)
- No - Category B

1.10. Will this activity require any land dredging?

- Yes – Category B
- No

1.11. Will this activity result in any significant increase in pollution?

- Yes – Category B
- No

1.12. Will this activity result in the occurrence, or increase the chances of occurrence, of natural hazards such as soil erosion, flooding, tidal inundation or hazardous substances?

- Yes – Category B
- No

1.13. Are utility services unavailable and/or inadequate for the activity?

- Yes – Category B
- No

Step 4: Social Risks

1.14. Will this activity require compensation for crops and/or assets?

- Yes – Category B
- No

1.15. Will this activity significantly impact areas, landscapes and structures of aesthetic, archeological, cultural, historical, recreational, scenic or scientific value?

- Yes – Category B
- No – ensure chance find procedures in place. Annex 8.

Step 5. World Bank and Kiribati Risk Categorisation and Safeguards Instrument

ESA Project (Kiribati). If identified in Step 3, apply for an environmental License and prepare a BEIA or EIA as required by the ECD, incorporating an ESMP (WB) IEE (ADB).

Category B. If yes to any of the questions in Step 3 or Step 4, but not identified as an Environmentally Significant Activity under Kiribati law, ESMP required (WB). IEE (ADB).

Category A. If yes to Step 3 #8 or #9, exclude from project.

Minor project. If no's to all questions in Step 3 and Step 4. Minor risks. Prepare Waste Management Plan. Prepare Health and Safety Plan for Contractors.

Step 6: Preparation of safeguard instruments

Before developing safeguard instruments, discuss design with Project Team (Step 3 of Screening of Subprojects Process, see Section 7 of the ESMF).

The subproject _____ located _____
has been assessed and the following safeguard documents/instruments will be prepared:

- | | |
|---|----------------------|
| <input type="checkbox"/> EIA incorporating ESMP (Kiribati & WB) | Date Complete: _____ |
| <input type="checkbox"/> ESMP (WB) | Date Complete: _____ |
| <input type="checkbox"/> Waste Management Plan | Date Complete: _____ |
| <input type="checkbox"/> Health and Safety Plan | Date Complete: _____ |

Annex 7 Terms Of Reference for Safeguards Specialists

DRAFT TERMS OF REFERENCE SOCIAL, GENDER AND ENVIRONMENTAL SAFEGUARDS SPECIALISTS

Draft Terms of Reference International Social Safeguards Specialist

A. Introduction

1. This TOR has been prepared for social safeguards specialists to assist the project in updating and implementing the Resettlement Plan during implementation of the project.
2. Following ADB and Government of Kiribati policies on recruitment of consultants, the resettlement specialists will be recruited with the implementation consultants bidding and will be made up of qualified international and national specialists.

B. Scope of Works

3. The main responsibility of the consultants will be to ensure that the project is implemented in accordance with the Resettlement Framework/Plan prepared during the project preparatory technical assistance (PPTA) and relevant safeguard policies, handbooks, and guidelines of ADB and World Bank OP 4.12 policy and the government. The consultants' scope of works includes, but is not limited to the following tasks:

- Review previous loan and PPTA documentation with the view of improving methodology for preparing social safeguards of the project.
- Coordinate with engineers & other team members on-site to identify land and household areas that will be impacted by the project activities, requiring temporary or permanent resettlement or land acquisition.
- Undertake a socioeconomic baseline survey of 15% to 25% affected persons (APs), to gather information on (i) socioeconomic characteristics of the respondents and their families; age, level of education, sources of income, transportation access, land tenure, land holding, with information disaggregated by sex; (ii) nature of land acquisition requirements, i.e., temporary or permanent, the use of land and the tenure arrangement; (iii) the impacts of land acquisition i.e. if there are trees or fish pond that will be affected; and (iv) classification of vulnerable people, if any
- Conduct a census and inventory of losses of 100% of APs, recording all losses of land and structures and livelihood as a result of the project.
- Prepare Resettlement Plan updates, as per ADB's safeguard policies on involuntary resettlement; the Project Resettlement Framework; and government laws.
- Prepare a revised budget for resettlement and land acquisition, as per the entitlement matrix and update the entitlement matrix to suit the subproject situation.

C. Staffing Inputs and reporting

4. The resettlement team will consist of one international and one national specialist with demonstrated experience in resettlement following ADB and WB safeguard policies. A representative from MELAD will be involved to ensure that all compensations are calculated and approved within the laws of Kiribati. Furthermore, the RP and any updates, and its implementation, compensation, and completion will be approved by ADB and WB at the completion of each of these stages.

5. The following reports will be required for submission:
 - b) Resettlement Plan and any necessary budget updates
 - c) Full details of persons consulted

- d) Public Consultation materials
- e) Internal evaluation reports and completion report

Draft Terms of Reference for Gender Based Violence Specialist (international)

- (i) Oversee the overall implementation of the GENDER ASSESSMENT and GBV Framework including undertaking field visits to monitor GENDER ASSESSMENT actions and progress and coordinating with the OIIU National Gender Social Safeguards Specialist, contractors and other consultants in implementing the project's gender activities.
- (ii) Establish an MOU between ADB and MWYSSA for the implementation of the GBV Framework;
- (iii) Lead on delivery of specific activities in the GENDER ASSESSMENT including: Develop communication and awareness raising material based on gender aspects of the project outlined in the GENDER ASSESSMENT; supporting the establishment of the MISE Women in Infrastructure Network.
- (iv) Provide technical backstopping and oversight to National Gender Expert.
- (v) Support and training for MISE and MICT gender focal points to assist in the implementation of the GENDER ASSESSMENT;
- (vi) Organize trainings, workshops and events for the OIIU staff, consultants, contractors on gender instruments and sexual harassment;
- (vii) Support the contractor and National Gender Social Safeguards Specialist to conduct gender inclusive participatory community consultations with local women and men (in separate groups) to meet/exceed women participation target;
- (viii) Implement the collection of sex-disaggregated data relevant to the project and reflecting on GENDER ASSESSMENT targets and indicators and input into GENDER ASSESSMENT progress reports to be prepared by National Gender Social Safeguards Specialist on a biannual basis.
- (ix) Design monitoring tools for GBV Framework and GENDER ASSESSMENT.

OIIU Gender Social Safeguards Specialist (National)

- (i) Implement and monitor the GBV Framework and GENDER ASSESSMENT on a day to day basis, ensuring all stakeholders and contractors understand and deliver against their targets in the GENDER ASSESSMENT.
- (ii) Provide orientation for partners and staff on the GBV Framework and GENDER ASSESSMENT and related instruments.
- (iii) Establish, maintain and report on the GBV GRM (act as the GRM Operator).
- (iv) Regular monitoring of the contractor's compliance with GBV Framework and GENDER ASSESSMENT and requirements (including targets for women's employment and indicators set out in the GENDER ASSESSMENT).
- (v) Prepare semi-annual safeguards and GENDER ASSESSMENT report and other necessary monitoring reports working closely with the international Gender Based Violence Specialist and other consultants.
- (vi) Conduct community consultations at project sites on the GBV Framework and instruments.
- (vii) Assist in preparing awareness raising materials on GBV.
- (viii) Provide assistance to the international gender specialist on all gender activities, including providing gender training for MWYSSA, MISE and MICT, organising consultations and meetings, collecting monitoring information etc.
- (ix) Assist the International Gender Based Violence Specialist in implementing and monitoring gender activities particularly those under the contractor's responsibilities and collecting sex disaggregated data according to project design and monitoring framework.

Draft Terms of Reference International Environmental Specialist (IES) KOITIIP

(similar for National Environmental Specialist in all tasks to assist IES in the following)

The International Environmental Specialist (IES) will support the environmental management activities of the Project Management Office (PMO) and Governor’s Office ZUFEZ (GOZUFEZ). Tasks include, but are not necessarily limited to:

- (a) Facilitate the ongoing capacity development activities to government and local counterparts, national consultants and contractors to ensure skills transfer for improved sustainability of investments. Proposed capacity building will include (a) awareness training of the OIIU and MICE & MICT (including management) contractors on environmental management, including on the ADB and Kiribati requirements on environmental safeguards, (b) capacity building programs to improve the capability of environment staff at all levels in carrying out, and monitoring environmental management measures and (c) capacity building programs on environmental issues including environmental management requirements and implementation, pollution control, guidance on obtaining environmental clearance;
- (b) In conjunction with the National Environmental Specialist (NES) and OIIU and MICE & MICT officers facilitate and participate in consultations as required by the Consultation and Participation Plan (CPP) prepared for the Project;
- (c) Based on detailed proposals and engineering designs, work with a national environmental specialist (NES) to assist contractors to update any environmental assessments already prepared or assist to prepare EIA and/or IEE for new contractors in accordance with ADB Safeguard Policy Statement 2009 (SPS) and the Kiribati law on environmental protection;
- (d) During detailed design ensure that contractors update the environmental management plan (EMP) as required and assist OIIU specialists as required to include the updated EMP, other plans and all relevant provisions and text from the updated EIA and/or IEE into the contract documentation;\
- (e) Assist OIIU and MICE & MICT, in consultation with the Ministry of Environment Land and Agricultural Development (MELAD), to ensure that environmental safeguard measures comply with country safeguard requirements including but not limited to (a) submission of the application and EIA documents to MELAD; and (b) submitting applications for environmental licenses under Environmental Act and Environment (General) Regulations 2017 on the prescribed forms and with the updated EMPs as necessary;
- (f) Assist the NES to review contractor’s detailed construction methodologies and site-specific EMPs (SEMP), including other plans as required for each committed project, suggest changes or revisions as required, and recommend to OIIU Head that approval of the SEMP may be issued;
- (g) Work with the NES to establish an environmental monitoring and reporting system within the OIIU and contribute to Quarterly Progress Reports - including compilation of relevant items from Monthly Reports - to be prepared by the OIIU for MICE & MICT and ADB. The monitoring and reporting system will cover SEMP compliance;

- (h) Monitor contractor's compliance with its SEMP (and other plans), and as necessary conduct on-site spot-checks of contractor's mitigations and review contractor's Monthly Reports regular monitoring reports for each subproject;
- (i) Ensure compliance with all environment safeguard assurances contained in any project grant or loan agreement;
- (j) Audit the project construction sites to verify the activities are implemented in compliance with the environmental health and safety (E&S) standards of the Contract including;
 - A grievance mechanism was developed and implemented for its staff (including its subcontractor's workers), in accordance with the E&S Standards, either through a grievance mechanism implemented and managed by the Contractor or through extending the grievance mechanism of the Employer to the workforce of the Contractor. In either case, the mechanism shall entail, clear reporting on grievances and the manner in which they are addressed between the Contractor and the Employer is required. The grievance mechanism should ensure proper handling of gender-based violence ("GBV") and sexual exploitation and abuse ("SEA") related grievances, including but not limited to sexual harassment. The Contractor shall ensure that its workers and the workers of its subcontractors are aware of this grievance mechanism.
 - The project construction ESMPs were developed in accordance with E&S Standards and based on the environmental and social risks and impacts assessment studies. The construction ESMPs should address as needed the following: air emissions and dust management; waste management (covering hazardous and non-hazardous waste streams); oil and chemical spill management; traffic and transport management; occupational health and safety management; emergency preparedness and response; community health and safety management; security management; grievance procedure (external for affected parties); noise and vibration management; chance find procedure; dredging management plan and environmental monitoring.
 - Occupational health and safety ("OHS") risk assessment of the works was performed in a manner consistent with good international industry practice as reflected in various internationally recognized sources including the World Bank Group General Environmental Health and Safety Guidelines. The Contractor will prepare a OHS management plan as part of the construction ESMPs based on a OHS risk assessment consistent with the E&S Standards.
 - EHS training for direct and contracted workers was designed and implemented in accordance with the E&S Standards the following set of: on applicable human resource policy provisions, grievance mechanisms, health and safety, code of conduct including training on the provisions intended to combat gender-based violence and Sexual Exploitation and Abuse, materials management, and environmental protection.
 - Project grievance mechanism for external stakeholders is established and efficient and is either adopted by all its subcontractors or there is clear communication to stakeholders on how to address grievances related to the activities of its subcontractors, including both works on the Concession Site and in any ancillary facilities and infrastructure. The community-level grievance mechanism implemented by the Contractor shall ensure proper handling of grievances arising from GBV or SEA.
- (k) Review quarterly project E&S monitoring reports prepared by contractors that should include, at a least, the submission of:
 - Safety: hours worked, recordable incidents and corresponding root cause analysis (lost-time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and

- preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth);
- Environmental incidents and high potential near misses and how they have been addressed, what is outstanding, and lessons learned;
 - Major works: those undertaken and completed, progress against project schedule, and key work fronts (work areas);
 - Noncompliance incidents with permits and Applicable Law (legal non-compliance), project commitments, or other E&S requirements;
 - E&S inspections and audits: by Contractor, engineer or others, including authorities — to include date, inspector or auditor name, sites visited, and records reviewed, major findings, and actions taken;
 - Training on E&S issues: including dates, number of trainees, and topics;
 - Footprint management: details of any work outside boundaries or major offsite impacts caused by ongoing construction — to include date, location, impacts, and actions taken;
 - External stakeholder engagement: highlights, including formal and informal meetings, and information disclosure and dissemination;
 - Security risks: details of risks the Contractor may be exposed to while performing its work — the threats may come from third parties external to the Project or from inappropriate conduct from the security forces employed either by the Owner or from public security forces;
 - Worker grievances: details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report;
 - External stakeholder grievances: grievance and date submitted, action(s) taken and date(s), resolution (if any) and date, and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report; and
 - Major E&S changes: to ESMS, E&S management, or E&S practices.
- (l) Deficiency and performance management: actions taken in response to previous notices of deficiency or observations regarding E&S performance and/or plans for actions to be taken, which should continue to be reported until the client determines the issue is resolved satisfactorily.
- (m) .

Reporting Requirements and Time Schedule for Deliverables

The International Environmental Specialist (IES) will be appointed (intermittently) for an initial period of four (4) months. Depending upon performance and confirmation of availability of financing, the assignment may be extended for a total duration of 10 months.

At least 50% of the time of the IES will be devoted to capacity building of the national environmental specialist (NES) (to be recruited separately) and to provide wider awareness raising and strengthening of GOFEZ and PMO staff (including management) and contractors in environmental safeguards. To ensure effective delivery of capacity building including on-the-job training for NES, OIIU staff and other

stakeholders, the IES will provide at least four months of input in the first year and at least three months of input in the second year (provided that the assignment is extended to accommodate this).

The IES will provide activity reports on a monthly basis to the Project Manager (PM) of the OIIU. The activity reports will summarize achievements against a work plan developed by the IES and approved by the PM at intervals determined by the PM.

The IES shall be stationed at the OIIU located in Tarawa but will conduct site visits Outer Islands as required to properly meet the requirements of the Project.

Annex 8 Physical and Cultural Chance Find Procedure

Cultural property include monuments, structures, works of art, or sites of significance points of view, and are defined as sites and structures having archaeological, historical, architectural, or religious significance, and natural sites with cultural values. This includes informal burial grounds, cemeteries, graveyards and graves.

The list of negative subproject attributes which would make a subproject ineligible for support includes any activity that would adversely impact cultural property. In the event that during reconstruction or construction sites of cultural value are found, the following procedures for identification, protection from theft, and treatment of discovered artifacts should be followed and included in standard bidding documents.


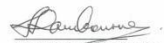
Chance find procedures will be used as follows:

- (a) Stop the earthworks, construction or land clearing activities in the area of the chance find;
- (b) Delineate the discovered site or area;
- (c) Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities and the relevant Ministry take over;
- (d) Notify the supervisory Engineer who in turn will notify the responsible local authorities and the relevant immediately;
- (e) Responsible local authorities and the relevant Ministry would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures;
- (f) Decisions on how to handle the materials found shall be taken by the responsible authorities and the relevant Ministry;
- (g) Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the relevant Ministry; and
- (h) Construction work could resume only after permission is given from the responsible local authorities and the relevant Ministry concerning safeguard of the heritage.

These procedures must be referred to as standard provisions in construction contracts. During project supervision, the Site Engineer shall monitor the above regulations relating to the treatment of any chance find encountered are observed.

Relevant findings will be recorded in World Bank Supervision Reports and Implementation Completion Reports will assess the overall effectiveness of the project's cultural property mitigation, management, and activities.

Annex 9 Schedule from Environmental Act (General Regulations) 2017

SCHEDULE	
Environmentally Significant Activities	
<p>Activities involving significant coastal and marine impact</p> <ol style="list-style-type: none"> 1. Extraction of aggregates, stones or shingles, sand, reef mud and beach rock – <ol style="list-style-type: none"> (i) for commercial purposes; (ii) for construction work; or (iii) in excess of 200 kilograms per year; 2. Clearance of live corals, mangroves and seagrass <ol style="list-style-type: none"> (i) for commercial purposes; (ii) for construction or development work; 3. Construction work below the high water mark 4. Construction of seawalls 5. Land reclamation 6. Construction of causeways 7. Establishment of boat channels 8. Dredging <p>Activities requiring significant materials</p> <ol style="list-style-type: none"> 1. Brick and tile manufacture 2. Landfilling <p>Activities involving significant waste products</p> <ol style="list-style-type: none"> 1. Keeping or producing more than 10 pigs or 20 chickens 2. Operation of landfills 3. Copra processing 4. Operation of waste disposal plants including recycling and collection systems; 5. Building for servicing and repair of vehicles, vessels and aircraft 6. Food processing facilities, canning, bottling and other commercial packaging of food 7. Beverage production or processing in excess of 200 litres per week 8. Commercial tanning and dyeing 9. Chemical treatment of timber 	<ol style="list-style-type: none"> 10. Manufacture of paper and pulp 11. Manufacture of cement and lime 12. Operation of a hotel, tourism resorts or estates (commercial accommodation more than 10 units) 13. Operation of restaurant 14. Operation of desalination plants 15. Operation of waste incinerators 16. Operation of industrial boilers 17. Intensive fish farming activities 18. Operation of agricultural industries. <p>Activities using significant natural resources</p> <ol style="list-style-type: none"> 1. The collection of fish to be used as pet fish 2. Collection in Kiribati waters of an organism that is intended to be used for commercial purposes 3. Pearl farming 4. Commercial logging operations <p>Activities involving harmful chemicals</p> <ol style="list-style-type: none"> 1. storage or transport of more than 1000 litres of petroleum, not including standard fuel tanks of conveyances 2. Operation of gas station 3. Manufacturing and moulding of plastic or fibreglass 4. Pesticide production 5. Use of pesticides in a commercial operation 6. Storage, handling, or disposal of (expired) pharmaceuticals 7. Fertiliser manufacture 8. Use of fertiliser 9. Use of hydroponic systems in a commercial operation 10. Vessel dry docking <p>Activities involving a significant alteration of the environment</p> <ol style="list-style-type: none"> 1. Any agricultural activity covering more than 10,000 square metres <p>Other environmentally significant activities</p> <ol style="list-style-type: none"> 1. operation of a facility— <ol style="list-style-type: none"> (i) that generates power for commercial purposes; or (ii) that has a total expected power generation capacity of 100 kilowatts 2. use or extraction of more than 10,000 litres of water per day from a well 3. operation of drainage, disposal or sewerage systems
<p>Dated this <u>13th</u> day of <u>December</u>, 2017</p> <p style="text-align: right;">  Honourable Alexander Teabo Minister for Environment, Land and Agricultural Development </p> <p>Published by exhibition at the Office of Te Beretitenti this <u>18th</u> day of <u>December</u>, 2017</p> <p style="text-align: right;">  Mrs. Tessie Eria Lambourne Secretary to Cabinet </p>	
<ol style="list-style-type: none"> 8. oil refining 9. operation of an airport 10. operation of a hospital 11. operation of ports and harbours 12. operation of vessel slip way and dry dock facility 13. operation of a commercial laundry service or laundromat 14. construction of settlements of more than 10 houses 15. disposal of unexploded ordnance 16. environment scientific research activity which involve one of the following: <ol style="list-style-type: none"> i). drilling, collection of living and non-living specimens or samples, and land and marine habitat and ecosystem including seagrass, coral, and other natural resources 	

Annex 10 Stakeholder Engagement Plan

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1. INTRODUCTION

1.1. Overview

This document is the Stakeholder Engagement Plan (SEP) which forms part of the environmental and social management framework (ESMF) of the Kiribati Outer Island Transport Infrastructure Investment Project (the KOITIIP, referred to hereinafter as “the Project”).

The Project development objective is to improve the safe and resilient transport connectivity of selected outer islands in the Gilbert Islands Chain of Kiribati, and in the event of an eligible crisis or emergency, to provide an immediate response to the eligible crisis or emergency. The Government of Kiribati (GoK) plans to implement the project with proposed co-financing between World Bank (WB) and Asian Development Bank (ADB), through a US\$21 million IDA grant and a US\$12 million ADB grant. The proposed components and cost estimates will be further reviewed, through consultation with GoK during the November 2019 mission, and will be updated based on the final cost estimates.

Stakeholder Engagement Plan (SEP)

The SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The goal of this SEP is to improve and facilitate decision making and create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner, and that these groups are provided sufficient opportunity to voice their opinions and concerns that may influence Project decisions. The SEP is a useful tool for managing communications between the implementing agencies (IAs); Ministry of Information, Communication, Transport & Tourism Development (MICT) and Ministry of Infrastructure and Sustainable Energy (MISE) and its stakeholders.

The Key Objectives of the SEP can be summarised as follows:

- Understand the stakeholder engagement requirements of Kiribati legislation;
- Provide guidance for stakeholder engagement such that it meets the standards of International Best Practice;
- Identify key stakeholders that are affected, and/or able to influence the Project and its activities;
- Identify the most effective methods, timing and structures through which to share project information, and to ensure regular, accessible, transparent and appropriate consultation;
- Develop a stakeholders engagement process that provides stakeholders with an opportunity to influence project planning and design;
- Establish formal grievance/resolution mechanisms;
- Define roles and responsibilities for the implementation of the SEP;
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.

1.2. Regulations and requirements

1.2.1.1 Statute and Regulations

This SEP takes into account the existing institutional and regulatory framework within the context of the following Kiribati legal instruments:

- Environment Act 1999
- Environment (General) Regulations, 2017
- State Lands Act 2001
- Foreshore and Land Reclamation Act 2005

2. AN OVERVIEW OF STAKEHOLDER ENGAGEMENT

2.1. What is Stakeholder Engagement?

Stakeholder Engagement will be free of manipulation, interference, coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format. It involves interactions between identified groups of people and provides stakeholders with an opportunity to raise their concerns and opinions (e.g. by way of meetings, surveys, interviews and/or focus groups), and ensures that this information is taken into consideration when making project decisions.

Effective stakeholder engagement develops a “social licence” to operate and depends on mutual trust, respect and transparent communication between the Project and its stakeholders. It thereby improves its decision-making and performance by:

- **Managing costs:** Effective engagement can help the Project avoid costs, in terms of money and reputation;
- **Managing risk:** Engagement helps project IAS and communities to identify, prevent, and mitigate environmental and social impacts that can threaten project viability;
- **Enhancing reputation:** By publicly recognising human rights and committing to environmental protection, IAs and financial institutions (Asian Development Bank and World Bank) involved in financing the project can boost their credibility and minimise risks;
- **Avoiding conflict:** Understanding current and potential issues such as land rights and proposed project activities;
- **Improving corporate policy:** Obtaining perceptions about a project, which can act as a catalyst for changes and improvements in IAs corporate practices and policies;
- **Identifying, monitoring and reporting on impacts:** Understanding a project’s impact on stakeholders, evaluating and reporting back on mechanisms to address these impacts; and
- **Managing stakeholder expectations:** Consultation also provides the opportunity for IAs to become aware of and manage stakeholder attitudes and expectations.

2.2. Principles for Effective Stakeholder Engagement

Stakeholder engagement is usually informed by a set of principles defining core values underpinning interactions with stakeholders. Common principles based on International Best Practice include the following:

- **Commitment** is demonstrated when the need to understand, engage and identify the community is recognised and acted upon early in the process;
- **Integrity** occurs when engagement is conducted in a manner that fosters mutual respect and trust;
- **Respect** is created when the rights, cultural beliefs, values and interests of stakeholders and affected communities are recognised;
- **Transparency** is demonstrated when community concerns are responded to in a timely, open and effective manner;
- **Inclusiveness** is achieved when broad participation is encouraged and supported by appropriate participation opportunities; and
- **Trust** is achieved through open and meaningful dialogue that respects and upholds a community's beliefs, values and opinions.

2.2.1. Stakeholder Engagement Considerations

The following considerations should be made when planning for stakeholder engagement:

Time and resources:

It takes time to develop and build trust based relationships with stakeholders. The consensus from practitioners is that from the outset relationships with stakeholders should develop and grow, and that these relationships should be nurtured and fostered not to fade.

Additional stakeholders might be identified that also want to be engaged. No willing stakeholder should be excluded from the process of engagement. Some stakeholders will need to be educated about the concept of engagement itself, as well as on the complex issues requiring specialised and technical knowledge. These demands can increase the cost of consultation required to meet external expectations, and often this occurs at a time when a project lacks the internal capacity and resources to implement a broad engagement strategy.

It raises expectations:

Stakeholders can have unrealistically high expectations of benefits that may accrue to them from a project. As such IAs from the outset must be clear on what they can and cannot do, establishing a clear understanding of their roles and responsibilities.

The stakeholder engagement processes should provide IAs with an opportunity to develop relationships with stakeholders and potential project partners who can assist with implementing corporate social responsibility projects.

Securing stakeholder participation:

Cultural norms and values can prevent stakeholders from freely participating in meetings. Often there are conflicting demands within a community, and it can be challenging for a project to identify stakeholders who are representative of common interests. This might be avoided by employing local consultants who are sensitive to local power dynamics, which requires project proponents developing an awareness of the local context and implementing structures to support and foster effective stakeholder engagement.

Consultation fatigue:

Moreover there is evidence to suggest that stakeholders can easily tire of consultation processes especially when promises are unfulfilled, and their opinions and concerns are not taken into consideration. Often stakeholders feel their lives are not improving as a result of a project and this can lead to consultation meetings being used as an area to voice complaints and grievances about the lack of development. This might be avoided by coordinating stakeholder engagement during the ESIA process, and by ensuring practitioners do not make promises to stakeholders, but rather use the public consultation process as an opportunity to manage expectations, challenge misconceptions, disseminate accurate project information, and gather stakeholder opinions which are feedback to the client and other project specialists.

2.3. Stakeholder Identification

In order to develop an effective SEP, it is necessary to determine who the stakeholders are and understand their needs and expectations for engagement, and their priorities and objectives in relation to the Project. This information is then used to tailor engagement to each type of stakeholder. As part of this process it is particularly important to identify individuals and groups who may find it more difficult to participate and those who may be differentially or disproportionately affected by the project because of their marginalised or vulnerable status.

It is also important to understand how each stakeholder may be affected – or perceives they may be affected – so that engagement can be tailored to inform them and understand their views and concerns in an appropriate manner.

Stakeholders have been and will continue to be identified on a continuing basis by identifying:

- Various stakeholder categories that may be affected by, or be interested in, the Project; and
- Specific individuals, groups, and organizations within each of these categories taking into account:
- The expected Project area of impact, that is the geographical area over which it may cause impacts (both positive and negative) over its lifetime, and therefore the localities within which people and businesses could be affected;
The nature of the impacts that could arise and therefore the types of national/local government entities, NGOs, academic and research institutions and other bodies who may have an interest in these issues.

In general, engagement is directly proportional to impact and influence, and as the extent of impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increases, engagement with that particular stakeholder group should intensify and deepen in terms of the frequency and the intensity of the engagement method used. All engagement should proceed on the basis of what are culturally acceptable and appropriate methods for each of the different stakeholder groups targeted.

2.4. Stakeholder identification and consultation methods

There are a variety of engagement techniques used to build relationships with stakeholders, gather information from stakeholders, consult with stakeholders, and disseminate project information to stakeholders.

When selecting an appropriate consultation technique, culturally appropriate consultation methods, and the purpose for engaging with a stakeholder group should be considered. The technique mostly used in Kiribati are:

Engagement Technique	Appropriate application of the technique
Correspondences (Phone, Emails)	Distribute information to Government officials, NGOs, Island Councils, and organisations/agencies Invite stakeholders to meetings and follow-up
One-on-one meetings	Seeking views and opinions Enable stakeholder to speak freely about sensitive issues Build personal relationships Record meetings
Formal meetings	Present the Project information to a group of stakeholders Allow group to comment – opinions and views Build impersonal relation with high level stakeholders Disseminate technical information Record discussions
Public meetings	Present Project information to a large group of stakeholders, especially communities at their local Maneaba Allow the group to provide their views and opinions Build relationship with the communities, especially those impacted Distribute non-technical information Facilitate meetings with presentations, PowerPoint, posters etc. Record discussions, comments, questions.
Focus group meetings	Present Project information to a group of stakeholders Allow stakeholders to provide their views on targeted baseline information Build relationships with communities Record responses
Project website	Present project information and progress updates Disclose ESIA, ESMF and other relevant project documentation
Direct communication with affected land/asset owners	Share information on timing of Project activity
Road signage	Share information on project activities Reminders of potential impacts (eg for closure of causeway or channel if or when required)
Project Booklet	Brief project information to provide regular update Site specific project information.

2.4. Stakeholders identified

2.4.1. Stakeholder Communities

A provisional list of affected communities (villages) has already been compiled based on the selected sites and area of impact. Villages are listed as follows:

Villages on Abaiang;

1. Tuarabu
2. Tanimaiaki
3. Tebero
4. Koinawa
5. Evena

Villages on Nonouti;

1. Temotu
2. Tenanoraoi
3. Tabiang
4. Mwakauro
5. Tengeauareke
6. Matang
7. Autukia
8. Rotuma
9. Temanoku
10. Teuabu
11. Benuaroa
12. Taboiaki

Villages on Beru;

1. Taboiaki
2. Eriko
3. Tabiang
4. Rongorongo
5. Nuuka KPC
6. Nuuka Catholic
7. Teteirio

Villages on Tabiteuea South;

1. Taungaeaka
2. Tewai
3. Buariki
4. Nikutoru
5. Katabanga
6. Taku

2.4.2. Project Stakeholders

Primary stakeholders for the project are adjacent landowners and potentially affected persons and any other person who would have an immediate interest in the project activity and likely be affected by the proposed project activity. This includes transportation users on the 4 outer islands as well as civil servants tasked with supporting the preparation and implementation and monitoring of the project.

2.4.3. Identification of Non-community stakeholders

Non-community stakeholders include:

Ministries at national level:

- Ministry of Finance and Economic Development
- Ministry of Information, Communication, Transport & Tourism Development
- Ministry of Infrastructure and Sustainable Energy
- Ministry of Environment, Lands and Agricultural Development
- Ministry of Internal Affairs;

Key Government Agencies:

- Kiribati Fiduciary Services Unit
- Outer Islands Implementation Unit

The OIIU will be responsible for monitoring of the project construction activities; assisted by environmental and social specialist consultants on a day to day basis. OIIU will carry out regular monthly inspections of construction activities and monitoring of mitigation measures.

The non-community stakeholders can be divided into the following groups for engagement at selected ESIA stages:

- National and local government authorities;
- International and national NGOs;
- Research/academic community;
- Media;
- Developers/project operators.

2.5. STAKEHOLDER ENGAGEMENT OBJECTIVES AND PRINCIPLES

The SEP has three corporate objectives, a number of project-specific operational objectives, and key principles. The stakeholder engagement programme will aim to achieve the objectives and comply with the principles.

2.5.1. Communal objectives

The corporate objectives of stakeholder engagement are

- A coordinated approach to all engagement actions;
- Consistency of messaging;

- Management of stakeholder expectations; and
- Reduction in the potential for delays in future project-related decision-making for issue of project approvals and permits or the need for costly redesign of operations/facilities.

2.5.2. Operational objectives

The operational objectives of stakeholder engagement are:

- Acquisition of information from certain stakeholders to assist preparation of the ESIA reports;
- Provision of information on and the ESIA to stakeholders;
- Ensuring that stakeholders have an understanding of how they might be affected and their potential role in Project implementation and impact management;
- Provision of opportunities for stakeholders to express their opinions and concerns in relation to the ESIA and the Project and for these opinions and concerns to be taken into account in the ESIA and the Project -related management decisions; and

Ensuring that stakeholders understand IA's corporate and operational aims and requirements, with respects to the Project and have confidence in IA's ability to manage environmental/social risks in a responsible and transparent manner.

2.5.3. Key principles

The SEP will ensure that the following key principles are applied to all engagement activities:

- Timing and number of engagement events designed to maximise stakeholder involvement and to avoid disruption to the 'daily business' of local stakeholders and also stakeholder 'fatigue';
- A senior IAs staff member to be present and participate actively at all relevant engagement events;
- Engagement events to occur in line with the SEP schedule so that there is clear linkage between engagement activities and the key stages in the ESIA processes;
- Ensure that engagement is managed so that it is culturally appropriate, adequate and timely information and opportunities are provided to all stakeholders to be involved/contribute; and
- Ensure that engagement is free from coercion, undertaken prior to key decisions and informed by provision of objective and meaningful information, and that feedback is provided to stakeholders after engagement has concluded.

IAs employs a protocol governing all stakeholder engagement activities. No interaction with any stakeholder related to the ESIA and the Project can be undertaken without the IA's permission.

2.6. Culturally appropriate engagement

It is critical that engagement is culturally appropriate, especially, but not exclusively, in terms of impacted communities. IAs plus the lead ESIA consultants are all familiar with the ethnic and cultural complexity of Kiribati. Most stakeholder engagement will be with outer island village inhabitants and it is known from previous engagement activities with such communities that traditional social and cultural norms are respected by almost all inhabitants. Local people have expectations that ‘outsiders’ will proceed through the ‘correct’ customary channels involving an appropriate local leader(s) before beginning work or initiating consultations with village residents. It is the intention that the ESIA local consultant will manage and, as appropriate, lead engagement events. Also, it is expected that all engagements will be in Gilbertese.

Prior to any engagement event the following actions will occur:

- Preparation of standard ‘question and answer’ sheets tailored for specific stakeholder types (based on ‘lessons learnt’ analysis and common issues raised in previous engagement);
- Planning/design of engagement action(s) with project management, consultants and then key ‘traditional’ and ‘formal’ authorities;
- Reaching an internal ESIA team agreement on the role of local and international consultants during stakeholder events and whether the presence of IAs staff is appropriate;
- Selection of individual stakeholders with whom engagement will occur;
- Selection of methods for disclosure of information (including such topics as format, language, and timing);
- Selection of location and timing for engagement event(s) (avoiding busy work times, which may be seasonal, and days/times when special events may be occurring);
- Agreeing mechanisms for ensuring stakeholder attendance at engagement event(s) (if required);
- Identification and implementation of feedback mechanisms to be employed.

3. ESIA IMPLEMENTATION

The Ministry of Finance and Economic Development (MFED) is the Executing Agency and the Ministry of Information, Communication, Transport & Tourism Development (MICT) and the Ministry of Infrastructure and Sustainable Energy (MISE) are the Implementing Agencies (IAs). The IAs are responsible for the management of all activities, including procurement, financial management, and reporting.

During ESIA implementation, EIA law requires adequate public consultation. This requirement is incorporated into the stakeholder engagement programme for this stage. The main purpose for consultations at this stage is to provide feedback to stakeholder as to ESIA progress and preliminary results (which may include early identification of key risks/impact issues and mitigation measures). This is also a stage when it may be clear that certain risk/impact issues are more, or less, important than first thought and, indeed, that new risk/impact issues are identified that need investigation.

4. STAKEHOLDER ENGAGEMENT: PROJECT LIFE-CYCLE

This SEP needs to be updated and refined throughout the lifecycle of the Project. During this process the focus and scope of the SEP will change to ensure that the Project addresses external changes and adheres to its strategy (which itself may change over time).

The key life-cycle phases to be considered when implementing stakeholder engagement are briefly discussed below.

- Design/Plan: the process of assuring that systems and components of the Project are designed, installed, and maintained to prescribed / agreed requirements;
- Implementation: the process and activities are implemented as planned

4.1. Stakeholder Engagement and Project Cycle

4.1.1. Engagement Phases

Stakeholder engagement within the ESIA process is critical for supporting the project's risk management process, specifically the early identification and avoidance/management of potential impacts (negative and positive) and cost effective project design.

Stakeholder engagement is an on-going process throughout the life of the project:

- Planning/design - disclosure
- Construction - operational

4.1.2. ESIA Disclosure

This is the second phase of engagement and it focuses on disclosing and consulting on the draft results of the ESIA process. Within the overarching ESIA engagement objectives, the specific objectives for the ESIA phase are to:

- Provide feedback to the stakeholders on the draft impact assessment and associated management/mitigation measures
- Gather stakeholder input on the impact assessment and outlined mitigation and enhancement measures

The disclosure and consultation activities will be designed along with some guiding principles:

- Consultations must be widely publicised particularly among the project affected stakeholders/communities, preferably 2 weeks prior to any meeting engagements
- Allow non-technical information summary to be accessible prior to any event to ensure that people are informed of the assessment and conclusions before scheduled meetings
- Location and timing of meetings must be designed to maximise stakeholder participation and availability

- Information presented must be clear, and non-technical, and presented in both local language and mannerism
- Facilitate in a way that allow stakeholders to raise their views and concerns
- Issues raised must be answered, at the meeting or at a later time

Targeted stakeholders may comment on the ESIA within the time indicated.

4.2. Operation Phase

4.2.1. Community Forum

To facilitate effective consultation with the communities during implementation and operation of the project, the IAs will work with the Island Councils to disseminate project information to community members.

4.2.2. Island Councils

Monthly Island Council Meetings will be used as a channel to disseminate information on the project.

4.2.3. Information Boards

Notice boards are effective mechanisms to inform the communities and wider audiences about the project. These can be installed on specific areas of impact (communities).

5. SEP Resources and Responsibilities

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within the IAs and the OIIU and the Works Contractors. The roles and responsibilities of the organizations are presented below.

5.1. MISE and MICT

IAs will have a social and environment team, which will work with the OIIU to:

- Approve the content of the draft SEP (and any further revisions);
- Approve prior to release, all materials used to provide information associated with the Project ESIA (such as introductory letters, question and answer sheets, PowerPoint materials, posters, leaflets and brochures explaining KOITIIP and ESIA process);
- Approve and facilitate all stakeholder engagement events and disclosure of material to support stakeholder engagement events;
- Participate either themselves, or identify a suitable IA representative, during all face-to-face stakeholder meetings
- Review and sign-off minutes of all engagement events; and
- Maintain the stakeholder database.

6. GRIEVANCE MECHANISM

6.1. Definitions and Grievance Procedure

A grievance mechanism has been developed for potential use by external stakeholders. The aim of the grievance mechanism is to achieve mutually agreed resolution of grievances raised by such stakeholders. The grievance mechanism described in this section is distinct from the grievance mechanism to be used by the Project's workforce.

This grievance mechanism ensures that complaints and grievances (see 'definitions' below) are addressed in good faith and through a transparent and impartial process, but one which is culturally acceptable. It deals with 'concerns' which are defined as questions, requests for information, or perceptions not necessarily related to a specific impact or incident caused by a project activity. If not addressed to the satisfaction of the person or group raising the concern, then a concern may become a complaint. Concerns are not registered as a grievance but will be managed via the Projects external communications plan.

Key definitions are as follows:

- Complaint: an expression of dissatisfaction that is related to an impact caused by a project activity, which has affected an individual or group. Adversely, the interests of an individual or group and the individual or group wants a proponent or operator (or contractor) to address and resolve it (e. g. problems related to dust deposition, noise or vibration). A complaint is normally of a less serious nature than a grievance; and
- Grievance: a claim raised by an individual or group whose livelihood, health and safety, cultural norms and heritage are considered to have been adversely affected (harmed) by a project activity which, if not addressed effectively, may pose a risk to Project operations (through stakeholder actions such as access road blockages) and the livelihood, well-being or quality of life of the claimant(s).

The grievance mechanism described in this section includes both complaints and grievances (hereinafter referred to only as 'grievances').

Grievances raised by stakeholders need to be managed through a transparent process, readily acceptable to all segments of affected communities and other stakeholders, at no cost and without retribution. The grievance mechanism should be appropriate to the scale of impacts and risks presented by a project and beneficial for both a proponent/operator and external stakeholders. The mechanism must not impede access to other judicial or administrative remedies.

This grievance mechanism sets out the following steps to be taken to resolve grievances and timeframes to reach a decision on grievances. The types of grievances stakeholders may raise include, but are not limited to:

- Negative impacts on communities, which may include, but not be limited to financial loss, physical harm and nuisance from construction or operational activities;
- Health and safety risks;
- Negative impacts on the environment; and

- Unacceptable behavior by staff or employees.

It is critical that stakeholders understand that all grievances lodged, regardless of the project phase or activity being implemented, will follow one single mechanism.

6.2. Grievance Redress Process

A grievance redress mechanism (GRM) is presented below to uphold the project's social and environmental safeguards performance. The purpose of the GRM is to record and address any complaints that may arise during the implementation phase of the project and/or any future operational issues that have the potential to be designed out during implementation phase. The GRM is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination) for any reports made by project affected people (PAPs). The GRM works within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level.

The key objectives of the GRM are:

- Record, categorize and prioritize the grievances;
- Settle the grievances via consultation with all stakeholders (and inform those stakeholders of the solutions)
- Forward any unresolved cases to the relevant authority.

As the GRM works within existing legal and cultural frameworks, it is recognized that the GRM will comprise community level, project level and Kiribati judiciary level redress mechanisms. Project Implementation Consultants, under the OIIU, will support the establishment of the GRM structure and system and diligently monitor its progress, revising the approach where necessary. Guidance will be provided to Village Councillors on the redress system so that they can assist community members to raise their concerns.

6.3. Community Level Grievance Redress Mechanism

The Island Council, through the Village Councillors, will have primary responsibility to receive, record and respond to complaints and grievances raised by community members. In addition, the Civil Works Contractor and MISE as Works Contractor, will assign a member of staff to serve as Community Liaison Officer (CLO). The OIIU will also establish a Project Contact Person (PCP) and these persons will be disclosed to the public through the network of Village Councillors.

Due to a lack of cellular network and landlines on most outer islands, the CLO and PCP will attend monthly meetings of the Village Council during project implementation, to ensure that they are informed of any complaints or grievances raised. Monthly Council Meeting minutes will document the complaint or grievance and track the response until a resolution is reached. Special meetings between the relevant Village Councillor(s) and the CLO and PCP may be called when an urgent response is required.

However, regarding disputes that include differences between households over land, or boundaries, even on issues triggered indirectly by the Project, the mechanism will also involve the Council Mayor, landowner(s) concerned, and if required, the representative from MELAD.

It is expected that any land dispute issues pertaining to the Project would be resolved at this level given the nature of land ownership and the significant authority vested under the Minister of Lands.

Where issues caused by the project are raised and resolved through these existing community level grievance redress mechanisms, it is important that a mechanism for reporting them to the IAs is established. Hence, the Island Clerk will record all complaints/outcomes as part of the monthly council meeting minutes, and if it is a land dispute, then MELAD will be involved to lead and record all complaints/outcomes.

This approach of using the existing mechanisms on the islands for resolving and reporting project related grievance is recommended.

6.4. Project Level Grievance Redress Mechanism

Many project related grievances are minor and site-specific. Often, they revolve around nuisances generated during construction such as noise, dust, vibration, workers disputes etc. Often, they can be resolved easily on site. Other grievances are more difficult especially when it's about land boundaries, or misunderstandings between affected households and the Contractor regarding access arrangements. Most of these cannot be resolved immediately and on site.

For minor complaints, such as noise or dust nuisance, the complaint will be communicated to the Works Contractor directly by the Aggrieved Party (AP) or by the Village Councillor and a response provided to the complainant within 48 hours. If appropriate action is not taken, the complainant will be made aware of his/her right to raise the complaint to the Magistrate's Court.

For major issues, such as occupation of land without consent, damage to property, personal injury, etc, it may be necessary to call a special Council Meeting, with the CLO and PCP in attendance, to address the issue. An initial response should be provided to the complainant within 24 hours, with an aim to resolve the issue within seven days. If a satisfactory solution is not reached, the complainant may file the complaint or grievance with the Magistrate's Court, which involves a registration fee of \$3.00. This fee will be paid by the IAs. If a lawyer is needed and the complainant cannot afford one, a lawyer, from the public defendants office, will be provided at no cost to the complainant. The Magistrates ruling will be binding on all parties.

A register of inquiries, complaints and grievances will be maintained by the Island Council Clerk, recording dates, names of complainants, action taken and persons involved. All concerns will be documented and shared on a monthly basis as an appendix to the regular monthly Council meeting minutes. The register will be available to the public and for monitoring purposes. Sex-disaggregated data will be prepared to identify the sex of complainants and the nature of their complaint.

It is vital that appropriate signage is erected at the sites of all works providing the public with updated project information and summarising the GRM process, including contact details of the relevant Project Contact Person and Contractors CLO. Anyone shall be able to lodge a complaint and the methods (forms, in person, telephone, forms written in Gilbertese) should not inhibit the lodgement of any complaint.

The Complaints Register will be maintained by the Island Court, with monthly copies provided to the PCP, which will log the: i) details and nature of the complaint; ii) the complainant name and their contact details; iii) date; iv) corrective actions taken in response to the complaint. This information will be included in MISE progress reports to ADB and WB.

The project level process can only act within its appropriate level of authority and where appropriate, complaints will be referred on to the relevant authority such as those indicated.

6.5. Judiciary Level Grievance Redress Mechanism

The project level process will not impede affected persons access to the legal system. At any time, the complainant may take the matter to the Island Magistrates Court.

Table 1: Grievance Redress Process at Project Level

Stage	Process	Duration
1	The Aggrieved Party (AP) will take his/her grievance to their Village Councillor or directly to the Contractors CLO, who will endeavour to resolve it immediately. Where AP is not satisfied, the CLO will refer the AP to the Project's Contact Person (PCP). For complaints that were satisfactorily resolved by the CLO, he/she will share the information and outcome at the monthly Island Council meeting, where the Island Clerk will log the grievance and the actions that were taken.	Anytime
2	On receipt of the complaint, the Contractors CLO will endeavour to resolve it immediately. If unsuccessful, he/she then notifies the PCP.	Immediately after logging grievance
3	The PCP will endeavour to address and resolve the complaint and inform the aggrieved party. If it's a land issue, the PCP will advise the appropriate IA (MITCCD or MISE) who will engage MELAD. The PCP will also refer to the IAs Project Manager other unresolved grievances for his/her action.	
4	If the matter remains unresolved, or complainant is not satisfied with the outcome at the project level, the IAs Project Manager, will then refer the matter to the Magistrates Court for a resolution. The decision of the Magistrates Court will be binding to all parties.	1 month

7. MONITORING AND REPORTING

Monitoring and evaluation of the stakeholder engagement process is considered vital to ensure IAs are able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. Adherence to the following characteristics/commitments/activities will assist in achieving successful engagement:

- Sufficient resources to undertake the engagement;
- Inclusivity (inclusion of key groups) of interactions with stakeholders;
- Promotion of stakeholder involvement;
- Sense of trust in the Project shown by all stakeholders;
- Clearly defined approaches; and

- Transparency in all activities.

Monitoring of the stakeholder engagement process allows the efficacy of the process to be evaluated. Specifically, by identifying key performance indicators that reflect the objectives of the SEP and the specific actions and timings, it is possible to both monitor and evaluate the process undertaken.

Two distinct but related monitoring activities in terms of timing will be implemented:

- During the engagement activities: short-term monitoring to allow for adjustments/improvements to be made during engagement; and
- Following completion of all engagement activities: review of outputs at the end of engagement to evaluate the effectiveness of the SEP as implemented.

A series of key performance indicators for each stakeholder engagement stage have been developed. The table below shows the indicators, and performance against the indicators will show successful completion of engagement tasks.

Table 1: Key Performance Indicators by Project phase

Phase activities		
Planning for construction	Share updates on project activities	Bill Boards displayed in allocated locations by time specified;
ESIA Implementation		Affected community stakeholders, with at least 30% women, have received and understand the Projects' ESIA information disclosed and attended the public meetings;
		Communities provided feedback;
		No complaints about non-receipt of materials received.
	Confirmation that the ESMP tasks are defined as specific individual or grouped environmental and social clauses in contract bid documents.	IAs (Contract Manager) to draw on ESIA/ESMP/SEP for bidding documents
	Confirmation that environmental management criteria are included as part of the contractor selection process, including their experience preparing and implementing ESMPs, etc	IAs (Contract Manager) to draw on ESIA/ESMP/SEP for Contractor selection process
	Environmental and Social Safeguards specialists located at the OIIU, providing assistance with ESMP implementation, contractor briefing on habitat protection, contractor ESMP supervision (including observations during construction), and participation in community consultation	IAs safeguard strengthening
	Compliance monitoring checklists prepared and being used by the contractor and safeguards consultant and due diligence notes, completed as defined in the ESMP, and making the notes available in an easily accessible file for the contractor, Technical Advisors,	ESIA/ESMP/SEP to guide management and monitoring processes

	OIIU Project Manager and others to use.	
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The identification of Project related impacts and concerns is a key element of stakeholder engagement that will occur over the Project life-cycle. As such, the identification of new concerns and impacts as the Project progresses will serve as an overall indicator for the utility of the stakeholder engagement process.

In the ESIA Reports there will be a review of the engagement activities conducted; levels of stakeholder involvement (particularly for affected communities, women and vulnerable people/groups); the issues discussed and outcomes; and the extent to which stakeholder issues, priorities and concerns are reflected in the ESIA Report, particularly with respect to mitigation and monitoring strategies contained in the Environmental and Social Management Plan.

8. MANAGEMENT FUNCTIONS

In this section the proposed organizational structure and management functions for the stakeholder engagement function within the Project are described. While IAs may decide to adapt this structure according their needs, it is emphasized that the various components listed and then described below should be represented in the organizational structure in order to successfully implement the SEP:

- Project Manager, is responsible for overseeing and coordinating all activities associated with stakeholder engagement;
- Environmental and Social Safeguards Specialists; will be responsible for implementing community engagement activities; and
- Administration, who will be responsible to manage all activities related to database, documents and logistics; and integration/support, which relates to the interaction with other departments, initiatives or projects.

8.1. Environment and Social Safeguards Specialists

Environment and Social Safeguards Specialist(s) will oversee all planned stakeholder engagement activities or in process of being implemented. Furthermore, the Specialist(s) needs to ensure that all stakeholder engagement aspects are a permanent item on all high-level management agendas, within the IAs, and that all actions arising from management decisions are implemented. Responsibilities of the Specialist(s) include the following:

- Develop, implement and monitor all stakeholder engagement strategies/plans for the Project/ESIA;
- Oversee all stakeholder engagement related activities for the Project;
- Manage the grievance redress mechanism;
- Interact with related and complementary support activities that require *ad hoc* or intensive stakeholder engagement (community development and land acquisition/resettlement planning and implementation);
- Act as mediator between IAs and stakeholders;

- Liaise with other project managers to ensure that stakeholder engagement requirements/protocols are understood; and
- Proactively identify stakeholders, project risks and opportunities and inform the PM / senior management to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities.

The Specialist(s) plays a critical role as internal change agent for social and stakeholder-related matters in IAs. This becomes important if social and stakeholder risks identified need to be escalated for higher-level decision-making to identify a resolution. The Specialist(s) need to remain actively involved with the community development and land acquisition/resettlement planning and implementation in order to identify potential risks or opportunities and ensure that the needed administrative support is provided. Moreover, grievances submitted as part the community development and land acquisition/resettlement processes needs to be addressed under the GRM scheme.

8.2. Integration and support

Due to the fact that stakeholder engagement activities will influence other departments or require their inputs, the Safeguards Specialist(s) needs to ensure the various managers are included or kept informed on the stakeholder engagement process. Decisions taken by managers might have a direct or indirect impact on communities which would need to be communicated at the appropriate time. For example, the Project's Engineering or Site Manager might decide to close a causeway for refurbishment, which could potentially have an impact on communities. Anticipated stakeholder engagement roles for the various decision-makers are outlined below:

- Project Manager: this manager will be responsible to sustain relationships and communicate with Government entities and the media. These engagements will be required throughout the Project's life and decisions taken as a result of these engagements could potentially impact IAs's relationships with communities e.g. site selection or compensation agreements;
- Contract Manager: opportunities for contractor/employment are a key concern for community members. They are also very sensitive about appointing people from local villages opposed to villages located further away from the project site. This requires that a defined process of employment be developed and clearly communicated to community leadership and members.

8.3. Consultation and Communication Plan

A draft Consultation and Communication Plan is prepared. This will need to be updated and detailed by OIIU in consultation with MISE and MITCCD at the commencement of project implementation. It will be used to guide communication and consultation activities during preparation, design and implementation of the project.

Draft Consultation and Communication Plan

Issue	Target Audience	Means of Communication	Responsible	Timing	Source of Funds
Free Prior and Informed Consultation. Presentation of information about the project, impacts and mitigation measures to confirm community support for the project.	Island Councils, village leaders, local communities, and their traditional leaders.	Consultation meetings. Presentation of plan/ project/ activity, land requirements. Consensus building/ decision making.	OIIU, MISE, MITCCD.	During project design	GoK counterpart
Works schedule Anticipated dust, noise and other works related impacts. Hazards and safety requirements Workers accommodation arrangements and community relations. GRM	Island Councils, village leaders, local communities, and their traditional leaders.	Consultation meetings with Island Councils and communities. Public notice boards/ signs	Contractors	Prior to commencement of works and during works as needed.	Contractors budget
Contractor community relations and issues	Island Councils, village leaders and traditional leaders	Regular meetings throughout works period.	Contractor	Throughout works.	Contractors budget
Disclosure of RP	Island Councils, village leaders, local communities, and their traditional leaders.	Consultation meetings to present RP/updated RP. Additional separate meetings with APs and their traditional leaders. Presentation of plan/ project/ activity, Consensus building/ decision making. Public posting of updated PIB in Island Council notice boards and dissemination to traditional leaders and APs.	OIIU, MISE, MITCCD	During RP preparation	GoK counterpart

Issue	Target Audience	Means of Communication	Responsible	Timing	Source of Funds
		Hard copy of approved RP provided to Island Councils for public access.			
	General public	Public disclosure on websites of ADB, WB and GoK websites (MFED, MISE, MITCCD)	ADB, WB, GOK (MFED, MISE, MITCCD)	Following approval of the RP	NA
Compensation disbursement schedule	Affected households	Notices to individual households	OIIU, MELAD	Minimum 1 week prior to disbursement	GOK counterpart