Government of Samoa

SAMOA AVIATION AND ROADS INVESTMENT PROJECT (P-176272)

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

Ministry of Works, Transport and Infrastructure

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Abbreviations and Acronyms

CEAR	Comprehensive Environmental Assessment Report
CERC	Contingent Emergency Response Component
CESMP	Construction Environmental and Social Management Plan
CFP	Chance Finds Procedures
COC	Code of Conduct
COEP	Code of Environmental Practice
CTSSU	Central Technical Services and Support Unit
D&S	Design & Supervision
DCA	Development Consent Application
E&S	Environmental and Social
ECR	East Coast Road
EIA	Environmental Impact Assessment
EPC	Electric Power Corporation
ESA	Environmental and Social Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
GoS	Government of Samoa
GRM	Grievance Redress Mechanism
IA	Implementing Agency
IDA	International Development Association
IWSA	Independent Water Scheme Association
LARF	Land Acquisition and Resettlement Framework
LMP	Labour Management Procedure
LTA	Land Transport Authority

MCIT	Ministry of Communications and Information Technology
MNRE	Ministry of Natural Resources and Environment
MOF	Ministry of Finance
MWCSD	Ministry of Women, Community and Social Development
MWTI	Ministry of Works, Transport and Infrastructure
OHS	Occupational Health and Safety
PDO	Project Development Objective
PEAR	Preliminary Environmental Assessment Report
PMD	Project Management Division
PUMA	Planning and Urban Management Agency
RP	Resettlement Plans
SAA	Samoa Aviation Authority
SARIP	Samoan Aviation and Roads Investment Project
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
STEC	Samoa Trust Estates Corporation
SWA	Samoa Water Authority
TLA	Taking of Lands Act 1964
TMP	Traffic Management Plan
WB	World Bank

1 INTRODUCTION

The Government of Samoa (GoS) has secured funding from the World Bank (WB) through the International Development Association Grant (IDA 19) for the Samoa Aviation and Roads Investment Project (SARIP) (hereinafter '*the Project'*). The Project will support investments in the aviation and road subsectors on Upolu as they both play a significant role in the country's economic development through supporting and promoting trade and commercial activity through the movement of goods and services.

The Project Development Objective (PDO) is to improve the climate resilience and safety of Samoa's transport sector.

As sub-project prioritization and detailed design will not occur until project implementation, an Environmental and Social Management Framework (ESMF) has been prepared to ensure that project activities are implemented in an environmentally and socially sustainable manner and in compliance with WB's Environmental and Social Framework (ESF)[1] and GoS' national laws and regulations.

The objectives of this ESMF are to:

- Outline legal and other requirements, principles, and guidelines for the assessment and management of environmental and social (E&S) risks;
- Provide information on the area where sub-projects are expected to be sited including - potential E&S vulnerabilities;
- Identify and preliminarily assess the potential E&S risks and impacts of proposed project activities/sub-projects;
- Establish clear procedures and methodologies for the E&S assessment, review, approval and implementation of investments to be financed under the Project;
- Specify appropriate roles and responsibilities, and outline the proper reporting procedures, for managing and monitoring E&S concerns, including gender-related matters arising from project activities;
- Outline grievance redress mechanism and processes for receiving and addressing project related complaints and grievances
- Outline the training, capacity building and technical assistance required to successfully implement the provisions of the ESMF;
- Establish the necessary budget for the implementation of the ESMF; and
- Provide practical information, tools and resources for implementing the ESMF.

This ESMF will guide the Implementing Agencies (IA) – the Samoa Airport Authority (SAA); the Land Transport Authority (LTA); and Ministry of Finance (MoF) –and sub-project proponents on the E&S screening and subsequent assessment of project activities throughout project preparation, design and implementation.

[1] World Bank Environmental and Social Framework is available at https://documents1.worldbank.org/curated/en/383011492423734099/pdf/The-World-Bank-Environmental-and-Social-Framework.pdf

The procedures outlined in the ESMF serve to ensure that potential adverse E&S impacts that may be generated as a result of each sub-project activity are identified early, and appropriate safeguards instruments are prepared prior to implementation to avoid, minimize, mitigate and, in cases where there are residual impacts, offset or minimize adverse E&S impacts. It also states the responsibilities of project stakeholders, identify monitoring and reporting requirements, as well as plans to enhance institutional capacity. Several other instruments have been developed to support the implementation of this ESMF, namely the (i) Land Acquisition Resettlement Framework (LARF), (ii) Stakeholder Engagement Plan (SEP) (including a Project Grievance Redress Mechanism), (iii) Labor Management Procedures (LMP) (including a Worker Grievance Redress Mechanism); and (iv) Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) Action Plan.

The Project's Environmental and Social Commitment Plan (ESCP) outlines the material measures and actions required for the Project to meet the WB's E&S standards.

2 PROJECT DESCRIPTION

2.1 Project location

The Independent State of Samoa (Samoa) is a small and remote Pacific Island Country with a population of approximately 204,000 people. Samoa, with a total land area of approximately 2,821 square kilometers consists of the two large volcanic islands of Upolu, (in which about 75 percent of the population lives) and Savai'i, as well as eight smaller islands.

SARIP will support investments in the aviation and road sectors on the main island of Upolu. The key sites are shown in Figure 1-1 and include:

- Faleolo International Airport
- East Coast Road; and
- Alafa'alava Road.

2.2 Project Overview

The project includes four components. Further information on subcomponent/activities is provided in Section 3.

Component 1: Climate Resilience and Safety Investments in the Aviation Sector.

Component1 will be implemented by SAA, and will support investments to improve climate resilience, safety and sustainability of the aviation subsector. This will include: i) technical assistance for climate resilience and safety investments at Faleolo International Airport including a site-level drainage master plan (including hydrological and hydraulics assessments, integrated flood resilience and stormwater drainage strategies), prioritization of potential resilience measures (rehabilitation / upgrade of the existing seawall and improvement of airfield drainage), design of a boundary fence, and feasibility study for the extension of the runway; ii) design and construction of climate resilient physical investments including (among other agreed measures based on the drainage master plan) the rehabilitation and upgrade of the existing seawall (supplemented by mangrove planting and other nature-based solutions where feasible) and airfield drainage improvements; and new navigation systems and boundary fence to improve operational safety; and iii) a regional airport maintenance program to maintain critical mechanical and electrical assets.

Component 2: Climate Resilience and Safety Investments in the Road Sector.

Coponent 2 will be implemented by LTA and will involve design and construction to improve the resilience of select road sections to climate-related hazards and/or events, and to improve the safety of the road network. The integration of climate change, disaster resilience, and safety considerations into infrastructure activities will help strengthen the resilience of assets, mitigate disruptions to roads access, and improve the functionality of the transportation network. This will include: i) the detailed design and construction of localized drainage upgrades for the East Coast Road (ECR) to help quickly drain storm surge and runoff to the sea, as well as rehabilitation of the road to improve climate resilience; and, ii) the detailed design and construction of localized upgrades for Alafa'alava Road to improve climate resilience. Road safety aspects and universal accessibility will be taken into consideration in the designs prepared under SARIP.

Component 3: Strengthening the Enabling Environment.

This Component will provide support to strengthen management capacity of LTA and SAA for project implementation, and will include technical assisstance for project management, Occupational Health and Safety (OHS), gender, and Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) activities .

Component 4: Contingent Emergency Response Component (CERC)

This component will provide swift response in an event of an Eligible Crisis or Emergency, by enabling Samoa to request the World Bank to re-allocate project funds to support emergency response and reconstruction. Given the lessons learned from the COVID-19 pandemic, the CERC under SARIP will allow flexibility to support health-related response in addition to transport-related response efforts.

Figure 1 Project Location (source: geo.worldbank.org)

3 LEGAL AND POLICY FRAMEWORK AND REGULATORY REQUIREMENTS

This section describes the Samoan legal, policy and administrative frameworks as well as the applicable World Bank Environmental and Social Framework) requirements. Gaps between the WB's ESF requirements and the existing country systems are discussed and some measures are also identified to manage the gaps.

3.1 Relevant Samoan Legislation, Regulations and Policies

The key legislative instruments relevant to SARIP activities and environmental and social assessment Samoa include:

- Planning and Urban Management Act (PUM Act) 2004
- Planning and Urban Management (Environment Impact Assessment) Regulations 2007
- Planning and Urban Management (Development Consent and Fees) Regulation 2008
- Samoa Codes of Environmental Practice 2007
- Land Transport Authority Act 2007
- National Parks and Reserves Act 1974
- Lands, Surveys and Environment Act 1989
- Waste Management Act 2010
- Samoa Occupational Safety and Health Act 2002
- Samoa Occupational Safety and Health Regulation 2017
- Village Fono Act 1990
- Taking of Land Act 1964
- Alienation of Customary Land Act 1965.
- Samoa Crimes Act 2013

3.1.1 Environmental Assessment and Management

The *Lands, Survey and Environment Act 1989* provides the basis for environmental protection in Samoa. It adopts an approach designed to avoid adversely affecting the beneficial uses of the environment from pollution, and the improper management of wastes.

The *Planning and Urban Management Act 2004 (*PUM Act) establishes a framework for the use, development, management and protection of land in Samoa for the present and long-term interests of all Samoans. The PUM Act is the primary environmental legislation in Samoa.

Part V Section 37 of the PUM Act 2004 requires consent for development within Samoa (a Development Consent). The process for determining whether a Development Consent is required and the application process are detailed in the *Planning and Urban Management (Environmental Impact Assessment) Regulations 2007*. Section 37 states that all development that takes place in Samoa needs consent unless a sustainable management plan or regulations provides otherwise. It specifies that a development shall not be carried out unless development consent has been obtained or unless the development is carried out in accordance with the consent.

Under the *Planning and Urban Management (Environmental Impact Assessment) Regulations 2007*, environmental assessments are required for any public or private development proposal that triggers qualifying criteria. The qualifying criteria relate to potential negative impacts on people, property, places, habitats and a range of situations detailed in the regulations, including:

- Adverse impacts on people, an existing activity, building or land
- Adverse impacts on a place, species or habitat of environmental (including social and cultural) importance
- Adverse impacts in conjunction with natural hazard risks
- Adverse impacts on or in the coastal zone
- Adverse impacts on or in any waterway or aquifer
- Adverse impacts arising from the discharge of any contaminant or environmental pollutant
- Adverse impacts associated with land instability, coastal inundation or flooding
- Adverse impacts on the landscape or amenity of an area
- Adverse impacts on public infrastructure
- Adverse impacts on traffic or transportation
- Any other matter for consideration stated in s46 of the Act.

Depending on the nature and scope of the development, either a Preliminary Environmental Assessment Report (PEAR) or a Comprehensive Environmental Assessment Report (CEAR) is required for a development that meets the qualifying criteria. The PEAR is required when Planning and Urban Management Agency (PUMA) evaluates a development to not have any significant or adverse impacts on the environment, and a CEAR where adverse impacts are likely to be significant. Once completed, the PEAR / CEAR is submitted with a Development Consent Application (DCA) including final design drawings, a site plan, certified survey plans, written consent from property owners, lease agreements, deeds of conveyance and a fee, to the PUMA to be reviewed. The PEAR and CEAR are open for public comment before a final recommendation is made to the PUM Board. Projects with significant adverse impacts and projects with a value of SAT$1 million or more must publish a public notice. A 28-day public notification period applies. The Board has representation of various ministries and public communities and can therefore act independently of MNRE. The Board may approve the application, decline it or approve it with conditions. Once development consent for buildings and infrastructure is granted, a building permit from the MWTI is required.

For SARIP, it is likely the following would be required:

a) Building permit in accordance with national requirements (PUMA);

b) Development Consent under EIA Regulation 2007 as per National Samoan Environmental legislation for incinerator and national laboratory.

The Lands and Survey and Environment Act 1989 (LSE Act 1989) also covers land allocation and the environmental management of land. Under the Act, regulations can be made to address specific issues including forest protection, regulation of various forms of land use, and biodiversity conservation.

3.1.2 Samoa Codes of Environmental Practices (COEPs)

The Samoan Codes of Environmental Practice (COEPs) were developed by the Government of Samoa to provide standards for avoiding or mitigating adverse environmental impacts associated with development project planning, design, construction and maintenance. The COEPs support the EIA Regulation and define methods and / or procedures that provide guidance for planners, designers and Contractors. COEP 1, COEP 11 and COEP 12 apply to the design and construction of project activities.

COEP 2: Road Planning, Design and Construction

In general road rehabilitation or upgrading works for existing roads, and the road alignment planning, design, and associated earthworks for new roads shall:

- Avoid as far as is practicable the disturbance, and or the resettlement of, villages, or individual buildings including houses;
- Avoid areas of land, foreshore, wetlands, waterways or other areas of habitat which have been set aside for the conservation of flora and fauna, and biodiversity;
- Avoid sites of archaeological, heritage, historical, traditional, and cultural importance;
- Avoid wherever possible National Parks, eco-tourism areas, foreshore reserves, forest reserves, nature reserves, riverbank reserves, traditional reserves, water catchment reserves, wetlands, and heritage and archaeological sites;
- If road user safety is not compromised, relax specified design standards in areas of steep and heavily vegetated slopes, sensitive coastal areas, and roads which could be part of a Scenic Roads programme;
- Incorporate design features for the general improvement of environmental quality;
- Incorporate design features for the protection and enhancement of coastal margins and other areas that require particular sensitivity; and
- Incorporate measures and design features for the mitigation of adverse environmental effects

The detailed design will meet the requirements and principles of general improvement of environmental quality by incorporating features that included the use of road marking, signage, sealed shoulders and dedicated bus stops. For the protection and enhancement of coastal margins and other areas that require particular sensitivity, the detailed design shall include the use of swales to help remove pollutants from road runoff. Design features and measures to mitigate adverse environmental effects include the use of drainage easements outfalls and seawalls.

COEP 3: Consultation

The basic principles of consultation, which should be applied to all development projects, are as follows:

- At the earliest opportunity, a community should be advised of potential projects and how the community can receive information about, and become involved with, such projects.
- The intentions/objectives of the consultation should be clearly and openly stated.
- Stakeholders and affected communities should have timely and meaningful inputs to, and participation in, any phases or aspects of projects that directly affect them and all inputs should be treated equitably and with respect.
- Consultation should be a two-way process and there should be an exchange of information where both the proponent and the affected communities should put forward their points of view and to consider other perspectives.

- Consultation is best undertaken at early stages in and throughout the decision-making process or at least on-going communication after a decision has been made.
- All parties do not have to agree to a proposal, however as a result of undertaking consultation at least points of difference will become clearer or more specific.

Project proponents must comply with the requirements of the *Planning and Urban Management (Environment Impact Assessment) Regulations 2007* as they pertain to consultation during the environmental impact assessment process.

COEP 4: Land Acquisition and Compensation

Land acquisition shall be minimized. Where unavoidable, land acquisition shall be carried out in such a manner so as to minimize the adverse impacts on the affected people. Avoid, wherever possible, the need to relocate graves and/or burial sites. Where this cannot be avoided, such relocation shall be carried out in a manner that will minimize duress on the relatives of the deceased. Land acquisition and compensation issues should be clearly distinguished from labor and industrial related matters in following the procedures established in this COEP. Any acquisition of land shall be carried out in consultation with the people to be affected and in accordance with the project consultation strategy (as set out in COEP 3 – Consultation).

COEP 5: Construction Camps

COEP 5 provides guidelines on the selection, development, maintenance and restoration of construction campsites in order to avoid or mitigate against significant adverse environmental effects, both transient and permanent. This COEP shall be read in conjunction with COEP 1 - Administrative Procedures.

In accordance with Part V of the PUM Act 2004 and any other relevant legislation, any person who engages in the development of a construction camp shall first obtain a Development Consent from PUMA for the proposed activity.

Consent applications shall be on a form approved by PUMA and shall be submitted by the person undertaking the camp construction. In the case of land development, the land developer rather than the contractor or agent shall submit the application. Applications shall be made no later than one month before the proposed camp construction is scheduled to begin. Applications shall be accompanied by such other documents as PUMA may require.

At any time during the consent process, PUMA may convene a public hearing or hearings for the purpose of determining the facts on which to base a decision. Adequate notice of the hearing or hearings, adequate opportunity to appear and be heard, and adequate opportunity to provide written comment, shall be given to all interested persons. PUMA may, upon issuance of a consent, impose any conditions or special requirements on the camp construction as it sees fit. All such conditions and requirements shall be listed in writing by PUMA and attached to the consent.

A camp construction consent issued by PUMA shall expire two years from the date of issuance. If the construction activity is ongoing at the time of consent expiration, a new consent application shall be submitted to PUMA one month before expiration of the consent.

COEP 6: Road Construction Erosion Control

COEP 6 defines measures for the prevention of erosion of exposed earth surfaces as a result of road construction activities, including post construction period, and to prescribe measures to be taken to

avoid erosion of channels and drainage outlets. It also prescribes measures to be taken to mitigate significant adverse effects of the discharge of water containing suspended soil particles into natural watercourses or onto land adjacent to road works. This COEP shall be read in conjunction with COEP 1 – Administrative Procedures. The planning and design of the alignment of any road project is to be undertaken to avoid, so far as it is possible, the disturbance of existing vegetation and strengthen the implementation of erosion control measures defined in this COEP.

In order to minimize the risk of water ponding adjacent to the toe of fill batters with the consequent risk of saturating fill materials with resulting batter failures, it is often necessary to construct toe drains. Wherever they are installed, road side drains shall be designed for their purpose and shall be protected against the effects of scour. The minimum protection shall be the establishment of suitable grasses. Where flow velocities are anticipated to be high, scour protection shall be afforded by rip rap, concreted stone pitching, concrete dished channels or other equally effective protection. Throughout the construction period and if necessary, it is intended that the discharge of silt-laden water from construction sites to natural water courses is also minimized. In ecologically sensitive areas and along any foreshore, untreated discharge must be prevented. In order to protect the surface of road shoulders against erosion from surface water flows it is necessary to surface the shoulder with non-erodible material. Such surfacing has the secondary benefit of minimizing the occurrence of edge break of adjacent sealed pavements.

COEP 8: Quarry Development and Operations

COEP 8 prescribes the safety requirements for the development and operation of quarries as well as to define procedures and works that shall be used to mitigate against adverse environmental effects. COEP 8 shall be read in conjunction with COEP 1 – Administrative Procedures and COEP 13 - Earthwork.

COEP 9: Gravel Extraction

COEP 9 provides the planning and construction guidelines for the extraction of river gravels for development projects with particular regard for the need to avoid or mitigate adverse environmental impacts from such work. In each case a proposal to extract river gravel for a development project must be compared in terms of economic cost and environmental cost with the alternative of obtaining gravel aggregates from existing or new quarries. This COEP shall be read in conjunction with COEP 1 – Administrative Procedures and COEP 13 - Earthwork.

COEP 11: Drainage

COEP 11 prescribes the procedures for the design, construction and maintenance of drainage structures and drainage channels to minimize short term and long-term adverse environmental effects. This COEP shall be read in conjunction with COEP 1 – Administrative Procedures and COEP

COEP 12: Traffic Control During Construction

COEP 12 prescribes the methods that are to be used for the safety and control of traffic during the upgrading, reconstruction or maintenance activities on any road. This COEP shall be read in conjunction with COEP 1 - Administrative Procedures. Note that the Contractor is to prepare a Traffic Management Plan (TMP) together with the Contractor's ESMP which shall be submitted for approval before the commencement of the works. Different sections of the WCR reconstruction may require special considerations and these will need to be highlighted in the TMP.

COEP 13: Earthworks

COEP 13 provides the planning and work guidelines for earthworks activities associated with development projects; with particular regard for the need to avoid or mitigate adverse environmental impacts from such work. This COEP shall be read in conjunction with COEP 1 – Administrative Procedures.

All earthworks shall be conducted in accordance with this COEP and in such a way as to prevent accelerated erosion, accelerated sedimentation and disturbance of potential cultural resources. To accomplish this, all persons engaging in earthwork activities shall design, implement and maintain erosion control, sedimentation control, and cultural preservation measures which effectively prevent accelerated erosion, accelerated sedimentation and adverse impact on cultural resources.

The detailed design will also considered minimizing the pollution load by the use of swales, earthen ditches and catch pits. Swales in particular attenuate the flow and encourage runoff to infiltrate the ground rather than discharge directly to the sea, the vegetation will provide some biological treatment and infiltration will filter out more of the pollution. The catch pits allow the drain to be blocked to allow clean-up in the case of a major accidental pollution incident such as spillage because of a road traffic accident.

3.1.3 Cultural Preservation

The key legislation protecting relics, antiquities and sites of historical and cultural significance in Samoa is the *Samoa Antiquities Ordinance 1954*. This ordinance aims to prevent the loss of national heritage treasures by export to overseas buyers but excludes botanical or mineral collections or specimens. A Heritage Policy was also passed by the Cabinet in 2002 for the sustainable management of Samoa's natural and cultural heritage sites.

For SCRTP, the kinds of physical cultural resources likely to be affected either temporarily or permanently are tombs and cemeteries in close proximity of the roads. In some cases, they may need relocation, in other cases, temporary protective measures to avoid damage during construction will be necessary. These measures will be specified in the ESMP.

3.1.4 Land Acquisition

There are three types of land ownership in Samoa:

- Freehold land: Freehold land is privately owned and constitutes approximately 12% of land area in Samoa and it can be transferred, leased, mortgaged or otherwise.
- Public land: Public land is owned by the Government of Samoa and constitutes approximately 7% of land in Samoa by area. Public land can be leased and, in certain circumstances, transferred.
- Customary land: Customary land is owned by the community in accordance with traditional custom and usage. Approximately 81% of land area in Samoa is customary land. Customary land may be leased but may not be otherwise sold or transferred. Both Upolu and Savai'i islands have predominantly customary land ownership, which extends to the high-water mark.

Key legislation in Samoa relevant to involuntary resettlement and compulsory land acquisition includes the *Taking of Land Act 1964*, *Alienation of* Customary *Land Act 1965* and the *Lands, Surveys and*

Environment Act 1989 (LSE Act), as well as the COEP 4 Land Acquisition and Compensation. The LSE *Act* provides a process for the alienation of Government land, land administration and other matters such as environmental protection, wildlife conservation and coastal zones. The Minister may approve purchase of any land for public purpose (s23) or lease of government land for up 20 years (s37). The Land Board administers government land.

The *Taking of Land Act 1964* establishes the taking of lands for "public purposes" (i.e., alienation of freehold or customary land). Leases of public land and customary land are administered by MNRE and are based on standard terms. The Minister of Lands is appointed by the *Alienation of Customary Land Act 1965* to act for and on behalf of all beneficial owners in signing a lease for registration.

More detail on the legal requirements for land and resettlement are presented in the LARF.

3.1.5 Occupational Safety and Health

The *Occupational Safety and Health Act 2002* (OHS Act) aims to enhance productivity, morale and welfare of people at work and of people affected by work activity. Other objectives are to secure the safety, health and welfare of employees; protect persons at or near placed of work and protect the environment from risk to safety arising out of activities of employees at work; and foster a co-operative consultative relationship between government, employers and employees on health, safety and welfare of employees at work.

The most relevant parts of the OHS Act are Sections 14 and 15, which say:

- An employer must take all reasonably practicable steps to protect the safety, health and welfare at work of employees and to provide and maintain a safe and healthy working environment including substances, systems of work and any building or public or private area in which work takes place.
- Requirements for safety are mainly the wearing of protecting clothing and equipment to avoid injury and damage to health.
- OSH requirements will be integrated into ESMPs and will be binding on construction Contractors.

3.2 World Bank Environmental and Social Framework

The ESF sets out the requirements for identification and assessment of environmental and social risks and impacts associated with projects supported by the WB. There are 10 Environmental and Social Standards (ESS) that establish the mandatory standards the Project must meet throughout the project lifecycle. Table 3-1 identifies the ESS applicable to SARIP and describes how they apply to the Project.

The Project's environmental and social risks have been classified as 'Moderate' by the WB. Six of the ten ESS have been screened as relevant.

Table 3-1 Applicable Environmental and Social Standards (ESS)

Environmental & Social Standard	Description of standard and applicability to SARIP
ESS1 – Assessment and Management of Environmental	ESS1 sets the requirements for assessing, managing and monitoring environmental and social risks and impacts associated with project activities.

and Social Risks and Impacts	SARIP involves multiple sub-projects with moderate environmental and social risk rating. For each sub-project, appropriate environmental and social assessment will be undertaken as per the requirements of ESS1, including stakeholder engagement as outlined in ESS10. ESS1 also requires that an Environmental and Social Commitment Plan (ESCP) is developed and implemented and that monitoring and reporting on the E&S performance of the Project against ESS occurs. The ESCP will set out the actions required for the Project to achieve compliance with the ESS and will form part of the legal agreement with the Bank. ESS1 also ensures that the relevant aspects of the ESHS is assessed and monitored closely in accordance to the environmental and social specification incorporated into various Contractors involved such as the construction Contractors and supervision firms. This is when the borrower with also conduct social and environmental assessment for the proposed projects and reporting against the ESSs.
ESS2 – Labour and Working Conditions	ESS2 sets out measures for sound worker-management relationships, including fair treatment, non-discrimination and equal opportunity. ESS2 applies to all direct, contracted and primary supplier workers. In accordance with ESS2, a Labour Management Plan (LMP) has been prepared for SARIP that outlines the labour management procedures that will apply to the Project (refer to LMP document). The LMP outlines the types of project workers to be engaged by the Project, and sets out the procedures that will be put in place to ensure proper working conditions and management of worker relationships, occupational health and safety, and to prevent SEA/SH. The LMP also includes a workers' grievance redress mechanism (GRM) and address issues as part of the contractor/worker Code of Conduct (COC). Due to the hazardous work situation, children under the age of 18 will not be allowed to work on the Project. The use of forced labour or conscripted labour on the Project is also prohibited.
ESS3 – Resource Efficiency and Pollution Prevention and Management	ESS3 sets out requirements for the implementation of technically and financially feasible measures for improving efficient consumption of energy, water and raw materials. The SARIP project is not anticipated to be a significant user of energy or water; however, opportunities for optimization will be implemented when feasible. ESS3 requires the project to avoid and minimise the release of pollutants into the environment which includes avoiding and minimizing project related air emissions. Air pollution potential will be largely limited to emissions from construction plant which are not expected to be significant. As part of the ESS1 process air pollution sources will be assessed are sub-project specific mitigation measures implemented. Hazardous and non-hazardous wastes will be avoided and minimized as far as practicable and reuse, recycle and recovery practices integrated into CESMP. Solid waste generation is expected to be limited to cleared vegetation, packaging materials (e.g., bitumen drums, cement bags), redundant infrastructure components (e.g., concrete and steel culverts) and domestic waste from employee activities. These materials are effectively inert and can be readily disposed to landfill with limited impact. The risk of pollution from hazardous materials is limited to accidental spills of fuel and oil from construction equipment. Construction pollution risks are expected to be managed through the implementation of appropriate environmental management measures that will be identified in the ESA ESMPs.

ESS4 – Community Health and Safety	ESS4 sets out measures to evaluate and manage potential risks and impacts of the Project on the health, safety and security of affected communities. Relevant aspects of ESS4 are considered throughout this ESMF, including measures to minimise the potential for community exposure to communicable diseases; ensuring that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project; managing the risks of labour influx; and preventing and responding to SEA/SH caused by project activities. In addition, community health and safety risks will be assessed and managed through sub-project associated instruments (i.e., ESA/ESMPs and CESMPs). SEA/SH risks associated with the Project will be managed through the preparation and implementation of a SEA/SH action plan. This plan will build upon previous/current plans implemented by the Ministry of Works, Transport and Infrastructure (MWTI), and LTA and include codes of conduct for project workers; workforce training; community awareness; a survivor-centred response protocol; monitoring and reporting arrangements; as well as a strengthened implementing partnership with the Ministry of Women, Community and Social Development (MWCSD). The risk of COVID-19 transmission between project workers and communities will be managed through implementation of the GoS regulations and guidelines.
ESS5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	ESS5 sets out measures for minimizing and managing the socio-economic impacts on persons and communities related to project land acquisition or restrictions on land use. All airport works will be limited to the existing physical footprint of APW, which is situated on, and surrounded by a buffer of Government-owned land. No land acquisition or impacts on economic assets are expected for the aviation component. All road rehabilitation and reconstruction activities will be confined to the legally established road corridors. However, minor land acquisition may be required for the establishment of drainage easements or to fix discrepancies between legal corridors and the existing road alignment and cleared corridor. Road sub-projects are likely to result in minor impacts on economic assets and small structures (i.e., fences); however, are not expected to significantly affect livelihood and income generation. A Land Acquisition and Resettlement Framework (LARF) in accordance with the requirements of ESS5 has been prepared to guide the management of potential land acquisition and resettlement impacts associated with sub-projects). Sub-project activities will be assessed for potential resettlement impacts. Where impacts are identified, sub-projects will be required to develop and implement resettlement plans before construction works commence.
ESS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources	ESS6 sets out measures to protect and conserve biodiversity as well as sustainably manage living natural resources. The environmental and social assessment process set out in ESS1 will assess the potential risks and impacts associated with project activities. Where potential risks or impacts are identified, they will be assessed in accordance with the measures outlined in ESS6. Activities that require physical works for the Project would largely occur within brownfield infrastructure sites and are anticipated to require negligible clearance of vegetation of biodiversity conservation importance. This will be determined and screened for each activity in accordance with ESS1. There is the potential to realize positive biodiversity outcomes associated with potential nature-based solutions for climate resilience (i.e., mangrove planting to enhance coastal protection at the airport).
ESS8 – Cultural Heritage	ESS8 sets out measures to protect cultural heritage from adverse impacts associated with project activities. Under SARIP, potential impacts associated with construction activities

	will be managed through the environmental and social assessment process set out in ESS1. The most likely cultural heritage encountered within the project area of influence are archaeological remains such as rock farming walls, pathways, house foundations or star mounds. Avoidance of any direct physical impacts will be the first priority. If avoidance cannot be achieved the cultural heritage sites will be assessed and managed in accordance with the processes outlined in ESS8. ESS8 will also be applicable to intangible cultural heritage (such as cultural spaces, skills, practices etc.) if a physical component of a project has any impact on such cultural heritage or the project intents to use the such cultural heritage for commercial purposes. Additionally, procedures will be a requirement for all project Construction Environmental and Social Management Plans (CESMP) prepared for physical works on ECR or Alafa'alava Road.
ESS10 – Stakeholder Engagement and Information Disclosure	ESS 10 sets out the requirements for engaging with stakeholders through the life-cycle of the Project including the nature, scope and frequency of engagement. Integrating stakeholder engagement within the project design and implementation and the requirements of ESS1, ESS2, ESS5, ESS7, ESS8. A Stakeholder Engagement Plan (SEP) has been prepared for SARIP in accordance with ESS10 and is attached as Annex VII. The SEP identifies the project stakeholders and describe culturally appropriate strategies and approaches for information disclosure (including E&S instruments) and seeking/incorporating feedback on project design and implementation. The SEP outlines the roles and responsibilities of MOF, MWTI, LTA and SAA as well as implementing partners (i.e., MWCSD) and Contractors. The SEP will outline the Project's GRM which will enable stakeholders to raise project related concerns and grievances. The existing GRM developed by MWTI and LTA for SCRTP is expected to be utilized/updated. The Stakeholder Engagement Plan (SEP) including the GRM will be implemented throughout the Project implementation period and will be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10.

3.3 World Bank Group Environmental, Health and Safety Guidelines

The following WB IFC Environmental, health and Safety Guidelines (EHS Guidelines) are relevant to the Project and have been used to guide the development of the LMP:

- General EHS Guidelines: Community Health and Safety. Section 3.6 - Disease Prevention.
- General EHS Guidelines: Occupational Health and Safety. Section 4.2 – Occupational Health and Safety
- General EHS Guidelines: Waste Management. Section 1.6 – Waste Management
- Environmental, Health, And Safety Guidelines Health Care Facilities. Section 2.1 General Facility Design and Operation

3.4 Gap analysis

Table 3-2 highlights the differences between applicable Bank safeguard policies and national laws, standards and regulations, and relevant measures for addressing key gaps.

The existing environment and land management legislation provides a satisfactory framework for the implementation of SCRTP activities in accordance with safeguard policies, however key pieces of legislation are currently under review.

Table 3-2 Gap Analysis

WB ESF requirements	***National requirement***	***Project fill gap measure***
Environmental and Social Assessment (ESA): Requires evaluation of a project's potential environmental and social risks and impacts; examines project alternatives; identifies ways of improving project selection, siting, planning, design, and implementation by preventing, minimizing, mitigating, or compensating for adverse environmental impacts and enhancing positive impacts; and includes the process of mitigating and managing adverse environmental impacts throughout project implementation. Environmental and social screening is undertaken to determine the appropriate extent and type of ESA.	A Preliminary Environmental Assessment Report is prepared when the proposal is not likely to have a significant adverse impact on the environment. A Comprehensive EIA may be required where it is considered that a significant adverse impact on the environment is likely. The PUMA screens projects to determine when an EIA is required. Notwithstanding the level of impact, the contents of a Comprehensive EIA specified in the PUM Regulations are necessary to meet WB requirements.	Environmental and Social Assessments prepared for sub-projects will ensure PUMA requirements and WB requirements are satisfied.
Cultural Heritage: Avoid and mitigate adverse impacts from Bank-assisted projects on tangible and intangible heritage	Prevent the export of, or damage to, sites of important national historical and cultural heritage.	No project impacts on intangible heritage. Chance Finds Procedures (CFP) is included in Annex II and will be included in each site-specific Environmental Management Plan ***(EMP) to manage potential for impacts on tangible heritage.***
Stakeholder Engagement: Stakeholders identified/analysed (including affected people, vulnerable groups and interested parties), consulted and provided with relevant information on E&S potential impacts/management measures.	COEP 3 Consultation Does not specify the need for participation and consultation with vulnerable groups.	Stakeholder Engagement Plan includes identification of vulnerable groups and tailored, culturally appropriate engagement measures.
Involuntary resettlement should be avoided wherever feasible, or minimized, exploring all viable alternative project designs.	In Part IIA of the Taking of Land Act 1964 (TLA), Section 24F states that: "In the exercise of the powers conferred by this Part of this Act the Minister or his officers, workmen or others	The project design will seek to avoid physical and economic displacement. Where such impacts cannot be avoided, best efforts will be made to minimize impacts through

	by his direction shall do as little damage as may be…"	design review. Acquisition of land will only be pursued once all viable alternatives have been considered.
Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs.	TLA Section 14 stipulates public notification of the intention to take land and allows for objections to be lodged.	Affected persons will be meaningfully consulted throughout the preparation of implementation of resettlement plans. Any severely affected persons will be consulted on the development of mitigation measures for relocation or livelihood restoration.
Affected land and non-land property is required to be compensated at full replacement cost.	TLA Part III Section 25 refers to the right for 'full and just' compensation for all affected people as the basis for determining the offered value of the affected land.	Compensation will be provided at full replacement cost. For land, compensation will be based on market value plus transaction costs. For structures, compensation will be sufficient to replace the affected structure without depreciation plus the cost of any transaction costs such as registration fees. For non-land properties that can be feasibly be moved, assistance will be provided to restore the affected property.
Persons eligible for compensation and assistance include: (a) with formal legal rights to land; (b) without formal legal rights but with valid claims to land/assets; and (c) without either (a) or (b) to the land they are occupying. Persons in category (c) are not entitled to compensation for affected land, but are entitled to compensation for non-land assets as well as assistance to resettlement and livelihood restoration if severely affected.	Eligible persons include only those with formal legal rights to land.	Persons without recognized legal entitlement to affected land will be compensated and assisted with respect to non-land assets and will be entitled to resettlement and/or livelihood restoration assistance if they are severely affected.
Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.	The legislation allows for compensation but not transitional assistance.	Persons who are severely affected, in addition to compensation for lost assets, will be provided with transitional assistance to enable them to restore their living standards. Assistance provided to persons required to relocate, will be aimed at ensuring security of tenure of their replacement housing in a location of at least equivalent characteristics and

		advantages of location. Persons who suffer permanent loss of sources of income or productive resources of 20% or more will be provided with assistance aimed at restoring their income earning capacity.
Monitoring & Evaluation: Requires monitoring and reporting on the effectiveness of EMP/Resettlement Plan (RP) implementation	MNRE carry out monitoring and compliance audits.	Monitoring requirements are set out in this ESMF and LARF.

4 PRELIMINARY ASSESSMENT: ENVIRONMENTAL AND SOCIAL IMPACTS

The potential E&S implications of proposed activities and sub-projects are discussed in this section. In several instances the impacts will be similar throughout the activities conducted under each component. Some possible mitigation measures are also provided; however, details of potential impacts and mitigation measures will be encapsulated in the ESMPs and other project planning tools.

4.1 Component 1: Aviation:

4.1.1 Context

Faleolo International Airport is located on the north-west coast of Upolu island and is 30 km west of Apia. The total land area of the airport site is approximately 340 hectares. The site is freehold land registered to the Samoa Airport Authority (SAA). A solar power plant is located on the eastern end within Airport boundary on land leased to Electric Power Corporation (EPC). The plant sits between the unused section of the runway and West Coast Road roughly 200m from the coastline.

The Pacific Ocean is immediately to the north of the airfield which adjoins the coastal lagoon which is part of an extensive lagoon system flanking the north-west coast of Upolu. The lagoon environment adjacent to the airfield has been modified by the establishment of the airport, in particular through the seawall construction and artificial drainage infrastructure. The airport's marine environs do not fall within, or near, any declared marine protected areas

Land-use in the area is predominantly agricultural with some residential properties to the east and south and some business, administration and educational areas to the west and south. The Sheraton Samoa Beach Resort is directly adjacent to the airfield's western boundary with Mulifanua village and wharf (the main transport connection for goods and people between Upolu and Savaii) further west. The area immediately to the east and south is Satapuala village and consists of residential properties, some small businesses of tourist fale operations and shops along the main West Coast Road, Police Faleolo Outpost, primary and secondary schools. The nearest school is located about 400 metres south from the airport entrance. A new hospital is also located to the west of the school and about 500 metres from the main entrance to the airport.

The majority of land, approximately 6,910 acres, directly south of the site is Government-owned and administered by the Samoa Trust Estates Corporation (STEC). It is primarily used as agricultural land for coconut plantations, grazing land for livestock and taro and banana plantations leased by local villagers. The Olo quarry (previously used as a aggregate source for runway upgrades under the Samoa Aviation Investment Project) is located within the STEC lands approximately 7 km to the south west of the main entrance to the airport. Malaevaalele Reserve, a small (2-hectare) area immediately across the road from Faleolo Airport entrance, is set aside as a conversation area. The reserve is planted with mature native trees and is listed on the IUCN database of protected areas.

Figure 2 Faleolo International Airport

4.1.2 Activities

This sub-component of SARIP will finance the following activities:

- Site options study and detailed designs for climate resilience and safety investments at Faleolo International Airport, including: site-level flooding resilience strategy and drainage master plan; a flood hazard assessment (including for 1 in 100 year flood event) and integrated structural and non-structural flood resilience investment options based on the above; and phased prioritization of potential resilience measures (these would include rehabilitation / upgrade of the existing seawall and improvement of airfield drainage, mangrove restoration, bio-swales, rainwater harvesting, rain gardens, etc.).
- Strategy and Master-planning - Technical assistance for the updating of the Samoa Aviation Sector Strategy for MWTI; and for the updating of the Masterplan / Business Plan for SAA. This will also include assistance to enhance SAA's emergency/contingency and evacuation planning.
- Feasibility, Design and Rehabilitation and upgrade of the existing seawall - The current seawall is constructed of a rock revetment wall and stretches approximately up to 3km. The rehabilitation of the seawall would require the removal and reorganizing of the existing rock wall as well as the potential sourcing of additional rock material for further reinforcement if needed.
- Implementation of airport infrastructure and terminal upgrades and improvements, and installation of any signage, early warning devices, etc. to enhance resilience of Faleolo International Airport to climate-related hazards and/or events including (based on the priority options under the Faleolo Airport flood resilience strategy and drainage master plan. This may include but not limited to the installation of larger culverts and additional discharge capacity to improve site drainage including potential retention basins and/or detention ponds. Excavation and earthworks will be required at some stage of the operations such as during installation of new sump and connection between taxiways and outfall.
- Feasibility study for the extension of the runway - The existing runway stretches up to about 2,700m and is in a condition that indicates the need for timely rehabilitation and urgent replacement. The feasibility study will examine the potential to extended the runway approximately 300m to the east to improve landing in adverse weather conditions and allow an additional 5-12 tons payload. [2]
- Design and installation of a boundary fence - The current plastic fence around the runway boundary is deteriorating and is damaged in some sections. The fence is supported by wooden and metal posts; however, the support system and fence are not solid enough to secure airport infrastructure during severe tidal conditions. The project will finance design and construction of a new boundary fence.
- Regional Airport Asset Maintenance Contract - Regional Airport Asset Maintenance Contract to assist in improving sustainability and resilience of airport assets through a five-year contract to maintain critical mechanical and electrical assets whose failure would compromise safety or disrupt operations at airports.

[2] Project Appraisal Document: Samoa Infrastructure Asset Management Project. World Bank, 1999.

4.1.3 Potential Environmental and Social impacts

4.1.3.1 Environmental (and Occupational Health Safety)

Coastal and Marine Environments

During rehabilitation and upgrading of the airport seawall, construction activities have the potential to impact the intertidal area and lagoon marine environment. These impacts are anticipated to be limited, as the rehabilitated seawall will be in the same footprint and of a similar scale to the existing wall. It is not anticipated that construction machinery would access the intertidal area as there is sufficient landside space available for construction machinery. The movement and placement of rocks, particularly during rain or high-tide, may result in sediment disturbance, erosion and potential minor sedimentation into the lagoon.

Once the seawall is complete, it would result in substantial long-term benefits by protecting airport assets from coastal inundation and storms as well as protecting the foreshore from further coastal erosion. The rehabilitated sea wall is unlikely to alter the existing natural lagoon erosional and depositional processes due to its comparable location and scale to the existing wall.

Improvements to airfield drainage, including new or larger culverts, changes to drainage channels or new flood retention basins could result in changes to the location or volume of stormwater being discharged to the coastal marine environment. This may increase the potential for erosion of the intertidal zone in small localized areas and associated impacts on benthic organism habitat may be expected. The design of new airfield drainage infrastructure, would allow for the inclusion of pollution/spill control measures and therefore result in an improvement of stormwater quality reaching the coastal marine environment.

Mangrove restoration will also be investigated during the feasibility phase of the seawall rehabilitation. Mangrove restoration may offer additional natural coastal protection as well as marine habitat benefits. The technical feasibility and practicality as well as potential social impacts, community and stakeholder support would be investigated further.

Storm water quality and sediment control

Construction works associated with the airport drainage network, including flood retention basins, would require disturbance of soils resulting in potential erosion and sedimentation of stormwater. This would be temporary while soils are exposed and could be minimized through standard erosion control measures outlined in COEP 6.[3] The installation of new airfield navigation aids would only require minor trenching and therefore have limited risk of soil erosion and sedimentation of stormwater. Hydrocarbon spills and oil leaks from machinery operations and refueling activities have the potential to impact stormwater quality if unmanaged during construction.

During operation, the new drainage improvements would reduce the potential erosion from within Faleolo Airport land resulting in a long-term benefit to stormwater quality that is discharged to the marine environment.

Under the separate Samoa Climate Resilience Transport Project, sections of West Coast Road are scheduled to be upgraded throughout 2022. This includes resurfacing and drainage works at the airport

[3] COEP 6 – Road Construction Erosion Control

entrance and eastward towards Apia. It is anticipated that these works will be complete before any civil works commence under SARIP and therefore adverse cumulative impacts on stormwater quality are unlikely. The drainage improvements on West Coast Road would also have long-term cumulative benefits when combined with flood management measures implemented under SARIP.

Air quality and dust control

Construction activities at Faleolo airport are unlikely to generate large amounts of dust from stockpiles or excavated areas. The transport of materials from Olo quarry does represent a greater potential risk of dust generation creating a nuisance for other roads users or sensitive receptors along the transport route. Standard dust mitigation measures would be sufficient to minimise any potential adverse impact.

The operation of machinery and the heating and laying of asphalt can be produce odors that become a nuisance for workers. It is unlikely odors would affect any residential areas given the large distance from any works to the closest sensitive receptor (greater than 500 meters). Any construction compound with a batching plant would also be located within airport owned land, greater than 500 metres to any sensitive receptors. All works would occur in restricted airside areas and therefore would be large distances from airport users.

Terrestrial biodiversity

The proposed construction activities at Faleolo airport are not anticipated to have adverse impacts on terrestrial biodiversity. Faleolo Airport land largely consists of paved areas, areas of mowed grass, or areas overgrown shrubby weeds. Replacement of the airport boundary fence would require clearing of some shrubs however this regularly occurs as part of the airfield maintenance activities. Also replacement of the seawall may require removal of small shrubs to create better construction access.

It is unknown whether the existing seawall is used by coastal marine birds for nesting and this should be investigated further during the environmental assessment stage of the seawall rehabilitation.

Noise and vibration

Given the closest sensitive receptors to any works associated with the seawall rehabilitation are greater than 500 meters, no adverse noise impacts are anticipated at villages surrounding the airport. The loudest activity is likely to be rock breaking for airfield navigation conduit trenches. Should this trenching be required at night due to its proximity to the runway, then a noise assessment would be conducted and appropriate mitigation measures developed. Replacement of the airport boundary fence would occur closer than 100 meters to residential dwellings however fencing construction is not typical a noisy activity.

No works would occur within close proximity to any structures and therefore vibration impacts are not anticipated to be an issue.

Transport of material from Olo quarry to the airport may cause a nuisance to sensitive receptors along transport routes. However, it is not anticipated that large volumes of material will be required and therefore frequent truck movements are unlikely.

During the feasibility assessment for the 300m runway extension, the size of planes to use Faleolo Airport as well as any potential changes to flight paths and flight frequency should be considered. Larger, potentially louder planes flying closer to residential areas has the potential to increase noise impacts at sensitive receptors.

Waste management
Waste generated from construction activities will include:

- Old boundary fence posts and wire
- Waste rock from the seawall that can't be replaced
- Excavated material from general drainage works
- General construction waste such as packaging, used oils and containers

The majority of waste generated from construction activities will be disposed at Tafaigata Landfill. However, waste management procedures stipulated in the construction environmental and social management plans will include any opportunities for separation of hazardous waste or reuse and recycling.

Material sourcing
Rehabilitation of the seawall would require additional revetment rocks to be sourced from Olo Quarry, which is approximately 2km south of the Airport. Olo quarry is not currently active therefore no new quarrying activities would take place until appropriate Development Consent Approvals have been obtained from PUMA and appropriate environmental, social and health and safety assessments have been undertaken.

Occupational health and safety
Construction workers and airport workers will be exposed to potential health and safety hazards throughout the life of construction activities. Contractors will be required to produce Occupational Health and Safety (OH&S) Management Plans that apply to all of the their workforce as well as visitors to site. The WB IFC Environmental, Health and Safety Guidelines will be used during preparation of the OH&S Management Plans[4].

4.1.3.2 Social

Land and Resettlement
All airport works will be limited to the existing physical footprint of Faleolo Airport, which is situated on, and surrounded by a buffer of freehold land owned by the Samoan Aviation Authority. No land acquisition or impacts on economic assets are expected. No informal land users have been identified on the site. There is potential for some disputes to arise with adjoining landholders/users during the construction of the airport perimetre fence.

The existing Olo quarry is expected to be utilised by the project. The quarry site and existing access road are situated on land owned by Samoa Trust Estates Corporation (STEC).

Community health and safety
The majority of activities will be focused/undertaken on SAA land. There are no communities/residential structures in close proximity to proposed sites. Community health and safety risks relate mainly to risks associated with airport users (the public and airport workers) and include interactions with construction workers and hazards caused by construction equipment and worksites; iv) anti-social behavior and SEA/SH associated with project workforce; and minor nuisance level noise and dust impacts during

[4] International Finance Corporation, Environmental Health and Safety (EHS) Guidelines, General EHS Guidelines, https://www.ifc.org/wps/wcm/connect/29f5137d-6e17-4660-b1f9-02bf561935e5/Final%2B-%2BGeneral%2BEHS%2BGuidelines.pdf?MOD=AJPERES&CVID=jOWim3p, accessed September 9, 2021.

construction. Communities along haulage routes from Olo quarry may experience increased road safety risks. Community health and safety risks will be manged through site specific safety planning and management; traffic safety planning and management; and code of conduct/training of the workforce.

Business Impacts
During the construction phase there is the potential for impacts on airport concessionaires and other small businesses in the airport vicinity. These impacts would be generally limited to noise, dust and traffic from construction activities and will be of limited duration. Standard good practice construction management will mitigate these potential impacts to an acceptable level. All potentially affected businesses will be included in the consultation process.

4.2 Component 2: Roads – East Coast Road

4.2.1 Context

The ECR is a runs along the north-eastern stretch of Upolu, linking Apia with the east coast of Upolu. The existing road has a 2-lane, bitumen surface. The road provides a sole economical route to all of the villages on the Eastern side of Upolu Island, which is roughly 20% of Samoa's population.

The road commences at Letogo village and runs close to the coast for approximately 16 kilometres before turning inland at Salouafata village for a further four kilometres. The road environment could generally be described as rural and coastal, and passes through nine villages: Letogo, Laulii, Leusoalii, Luatuanuu, Solosolo, Eva, Salelesi, Fusi and Saoluafata. All of these settlements are located on the coast, and many in the bays and inlets where streams and rivers drain into the sea. The road runs through these settlements. There are several river crossings along the route, with a range of bridge types, lengths, and widths, and at least three concrete fords.

Key hazards along the ECR include landslides and flooding. In several locations along the ECR the road is very steep and close to the landward side of the road which causes the road to be prone to frequent landslides and rock fall hazards. Ford crossings, are usually highly impacted during heavy rainfall seasons due to constant wave overtopping resulting in traffic disruption as vehicles are unable to cross.

Plate 1: Concrete ford river crossing, ECR

Plate 2: Outlet for existing river crossing, ECR

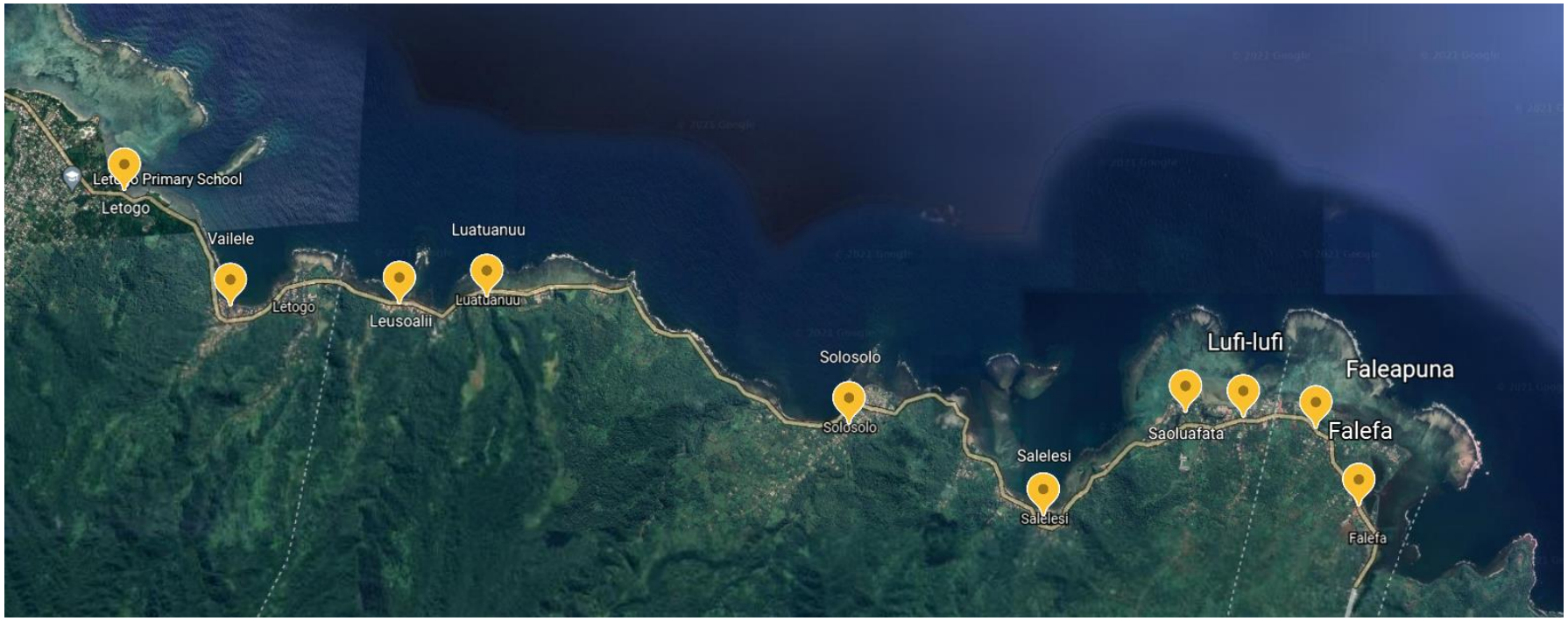

Figure 3 East Coast Road

4.2.2 Activities

This sub-component of SARIP will finance the detailed design and construction of:

- localized drainage upgrades to help quickly drain storm surge and runoff to the sea; and
- Rehabilitation of the road to improve climate resilience.

Road safety aspects and universal accessibility will be taken into consideration in the design.

In addition to this, the World Bank financed SCRTP is currently financing the related design and construction of:

- ECR Control Survey to confirm the legal corridor.
- ECR Improvement Options Study including feasibility-level technical, environmental, social, financial, and economic assessment of potential options for improving the existing road; and
- Slope stabilization works to reduce the landslip and rockfall hazards and reduce related risks to road assets and road users.

The 'ECR Options Study' is a key piece for work and includes the data collection (i.e. surveying, imagery, social and environmental data) and analysis of resettlement, safety and resilience issues along the corridor (including an environmental and social assessment to inform feasibility stage design); and a set of proposed alternative improvements considering financial, economic, social, environmental, resilience aspects, and recommendations for short and long-term interventions. Total budget for these works is approximately $US5 million.

4.2.3 Potential Environmental and social impacts

4.2.3.1 Environmental (and Occupational Health Safety)

Hydrology

A large number of rivers, streams and intermittent overland flow paths cross the ECR alignment, transporting stormwater from the inland catchments to the coastal marine environment. The ECR alignment should be considered a high risk area for soil erosion given the steep topography upstream of the road and the high volume of stormwater runoff from adjacent catchments. Any construction works that expose soils are susceptible to erosion and washout during rain events. Intermittent overland flow paths can appear unexpectedly presenting a risk to construction areas. Construction areas in close proximity to rivers and streams are susceptible to being washout or having incomplete structures undermined.

During the design of ECR, consideration must be given to river hydrology and hydraulics and overland flow paths, with appropriate engineering of river crossing and stormwater cross culverts.

Freshwater biodiversity

Upgrade works for ECR will include replacement of existing fords and bridges at river crossings. The number and location of these ford/bridge replacements will be determined during the ECR options study. Demolition and replacement of crossing structures will require work in and around rivers and streams. This has the potential to directly impact instream and riparian habitat though machinery movements. Construction of upstream and downstream bank erosion measures like riprap will also result in direct loss of freshwater ecology habitat.

Construction activities that expose soil will represent a high risk of erosion given the significant volumes of water that come down from the catchments above ECR. Erosion of soils may cause sedimentation of rivers and streams, impacting freshwater quality and freshwater habitats. The construction of temporary bridges for traffic bypasses may also create a barrier for fish passage if culverts are placed inappropriately. Excavation for bridge headwalls is likely to encounter groundwater inflows which will require pumping from excavated areas and discharging in a manner that minimise impacts on stream water quality.

Terrestrial biodiversity

The majority of ECR upgrade works will occur within an existing road corridor that has been highly disturbed by previous and current human activities. It is likely that clearing of vegetation would be limited to weedy shrubs, ornamental and introduced tree species and planted gardens.

Waste management

Waste generated from upgrade works on ECR will include:

- Demolition waste from removed bridges and fords
- Excavated material that is not suitable for reuse as fill onsite
- Stripped asphalt from road surfaces
- General construction waste such as packaging, used oils and containers

The majority of waste generated from construction activities will be disposed at Tafaigata Landfill. However, waste management procedures stipulated in the construction environmental and social management plans will include any opportunities for separation of hazardous waste or reuse and recycling.

Noise and vibration

The ECR is a populated road corridor with many residential dwellings within close proximity to the road. There are also a number of schools and churches along the road alignment. Noise produced by construction machinery and equipment has the potential to impact these sensitive noise receptors. Consideration and assessment of potential noise impacts will be undertaken as part of the ESIA process for ECR upgrade works. Village curfews should be consider in the scheduling of construction activities and no work should occur on Sundays. The close proximity of buildings to the ECR means vibration caused by machinery, particularly rock breaking, should be consider by the contractor to ensure vibration does not cause damage to surrounding structures.

Material sourcing

The sourcing and haulage of materials for the Project may impact local villages and other residential areas in terms of dust and noise generation and traffic disruption. Proper management measures to avoid such issues must be undertaken by the Contractor. It is currently unknown which Quarry would be used to source construction materials. The volume of material required and therefore the number of required truck movements is also unknown. Any materials would need to be sourced from an appropriately licensed facility and a Quarry Management Plan would be required from the quarry operator.

Physical cultural resources

Physical cultural resources include sites, structures, natural features and landscapes with archaeological and historical importance. These may include tombs and gravesites, cemeteries, historic rock walls, rock

building foundations or star mounds. Upgrade works for ECR will be largely within the existing road corridor and therefore are unlikely to impact any cultural resources. If cultural resources are identified during the ECR feasibility study then the project design will ensure any adverse impacts are avoided or minimized.

Occupation Health and Safety

Upgrade works along ECR would have the typical Occupational Health and Safety risks associated with road construction. This includes working around machinery and working in close proximity to a live road corridor. Given the location of works in areas prone to flash flooding, appropriate emergency procedures would also be required. All contractors would be required to produce an Occupation Health and Safety Plan that covers their workforce for the duration of construction activities.

4.2.3.2 Social

Land and resettlement

Rehabilitation works for ECR will be conducted within the existing road corridor. This corridor is currently being confirmed through the ECR Control Survey (under SCTRP). However minor land acquisition may be required to the establishment of drainage easements, to optimise slope stabilisation interventions; or to fix alignment discrepancies.

A key challenge for the sub-project is the presence of economic assets, small structures and residences within the road corridor in the urban areas where the road passes through – and particularly near river/stream crossings or in close proximity to the coast (refer plates 3 and 4). The extent of impact will depend on proposed improvements – however the project will avoid activiites requring significant land take or physical displacement. The ECR Options Study (including E&S assessment) will provide analysis of these issues and consider them alternatives.

Plate 3: Vailele Village

Plate 4: Luatuanuu Village (east settlement)

Community health and safety

Rehabilitation of ECR is expected to result in improved road safety including reduced risks associated with landslides, storm surge and general improvement resulting from safe road design. Key areas of concern include built up areas where residential houses, schools and other sensitive receptors are located on the road; and steep slopes - however these are largely unpopulated.

The most significant community health and safety risk during construction are road safety risks for road users (i.e. motorists and pedestrians) including hazards caused by construction equipment and worksites. Again, high risk areas build up areas where sensitive receptors are located; and narrow sections of the road where there is limited space between slopes and the coast line.

There is also a risk of anti-social behavior and SEA/SH related to community interactions with construction workers – particularly near schools. These risks will be managed through codes of conduct, worker training, community awareness and the project GRM which will be designed to handle SEA/SH related complaints.

Traffic disruption

Managing disruption to traffic is a key issue for rehabilitation work on ECR. A number of sections such as river crossings in urban areas and slope stabilization sections in close proximity to the coast present challenges for maintaining vehicle and pedestrian access while ensuring works are undertaken safely. It is likely that these activities will require full road closures for short periods. This will cause inconvenience for communities needing to travel to Apia for services requiring detours via Richardson's Road, South Coast Road and Cross Island Road involving an additional one hour's travel time. Traffic disruptions are also likely to impact local businesses (refer below). These issues will require further examination during the community consultation process, and measures to minimize traffic disruptions, including temporary daily access and/or passage during emergencies will be required.

Disruption to business

Many families along the ECR have roadside stalls, with some located within the road reserve, selling fresh produce including fruits, vegetables and root crops. Several small retail stores were also identified. Income from these types of activities greatly contribute to household daily revenue in local communities. These businesses may experience temporary displacement and disruption to these livelihood generating activities. These impacts will require to be further assessed and managed in accordance with the project's LARF.

Utilities and disruption to services

Electrical, water supply and sewage infrastructure is present in or directly adjacent to the ECR corridor. This infrastructure may be required to be relocated during rehabilitation activities – creating disruption to these services for local communities. The limited available space along the ECR also presents issues for their protection during construction works and/or their relocation. The presence of utilities also presents a number of constraints for road rehabilitation design. These issues will need to be assessed and managed in consultation with utility managers and local stakeholders.

Visual Amenity

ECR is a scenic route offering road users views of the north eastern coastline of Upulu and Pacific Ocean. There are also a number of natural tourist attractions along the route include the Piula Cave pools and Falefa Falls. Visual amenity impacts (and opportunities to enhance this amenity) – especially concerning slope stabilization works (financed by SCRTP) require consideration during the conduct of the ECR options study (financed by SCRTP) and subsequent design and implementation of additional rehabilitation interventions being financed by SARIP.

4.3 Component 2: Roads – Alafa'alava

4.3.1 Context

The Alafa'alava Road covers part of the inland route starting from Siusega/Vaitele-uta extending south to Tapatapaō for about 2.4km. It then runs westward to Tanumalala for about 14.2km until it reaches the junction of the cross-island road for Leulumoega to Safata districts (the focus of this project). The road is an alternate inland route from Apia to Faleolo Airport particularly in circumstances where the West Coast Road is closed or to relieve congestion along the primary coastal route.

The road runs through a rural landscape with mixed land use including agriculture and some industrial activities (eg. quarrying). The area is sparsely populated. There are no major settlements, instead rural residences are scattered along the length of the road as it passes through seven villages boundaries including: Ululoloa, Tanumapua, Aleisa-i-Sisifo, Aleisa-i-Sasa'e, Sapulu Faleasiu, Fasito'o Uta and Leulumoega. There are several businesses along the first 1.5km of the Alafa'alava Road from the Siusega intersection.

Alafaalava road has several hazards, including potholes, broken seal edges, blind spots and lack of road shoulders. In addition, there is currently no proper drainage system in place along this route.

There are 4 bridges located on Alafa'alava Road with all being in very poor state in terms of safety. All bridges are highly impacted during flooding periods due to overtopping which hinders vehicle crossing. The double-lane bridge on the eastern end of Alafa'alava Road is located approximately 15 metres from a Mormon Church compound and was also greatly affected by the flood in December 2020. The rock and concrete walls on the northern side of the bridge were almost completely washed out and bare soil is now exposed.

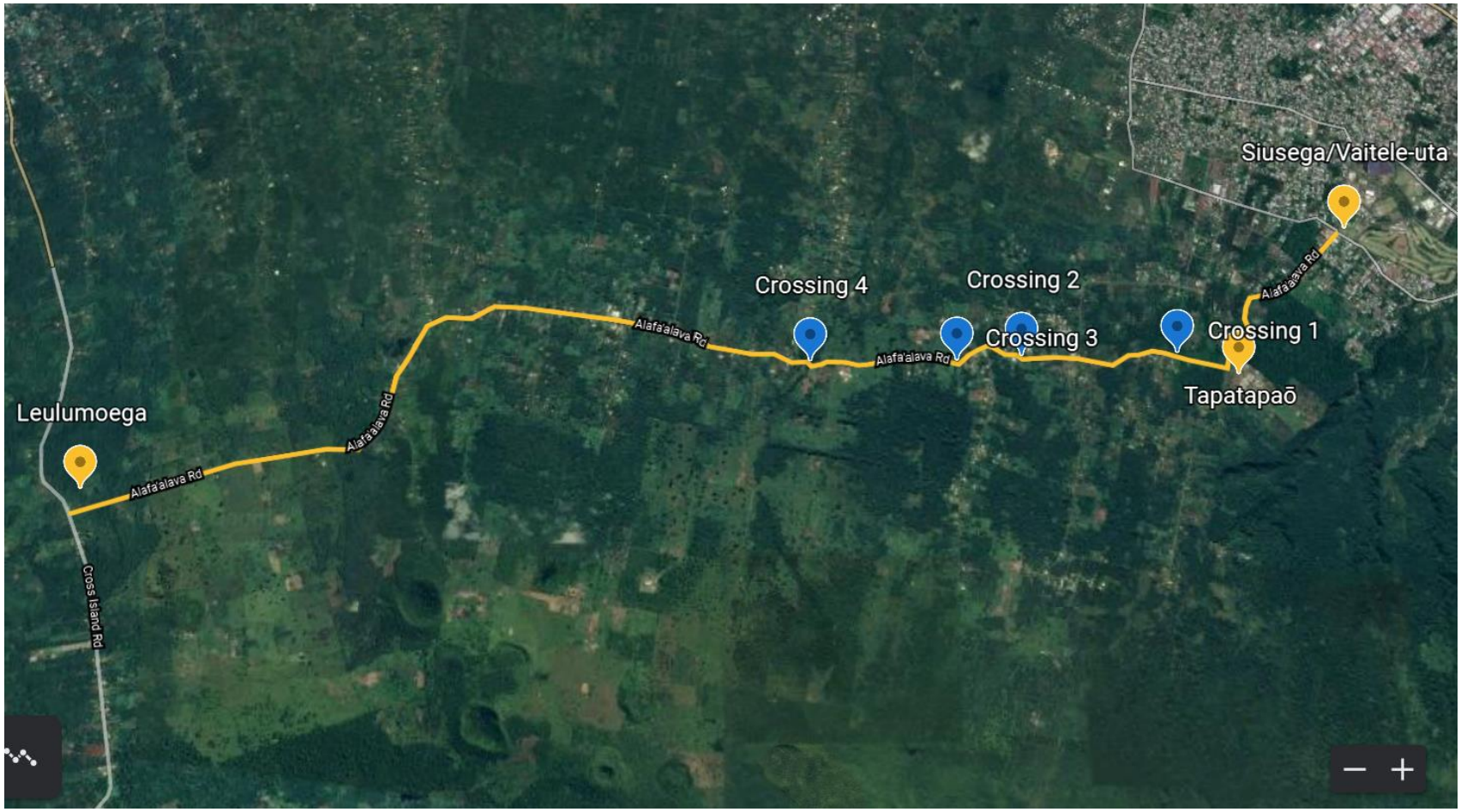

Figure 4 Alafa'alava Road (with locations of Target Bridge Reconstruction Sites)

4.3.2 Activities

This sub-component of SARIP will finance the detailed design and rehabilitation of priority localized drainage improvements, road embankment and pavement repairs - including the reconstruction of four new bridges. Road safety aspects and universal accessibility will be taken into consideration in the design. Total budget is for these works is approximately $US5 million.

In addition to this, the World Bank SCRTP is currently financing a Feasibility Study for Alafa'alava to establish the financial, technical and economic feasibility of developing an alternative inland route for all road traffic between Vaitele Industrial area and Faleolo airport, including consideration of potential environmental and social impacts and to provide preliminary designs and cost estimates for the preferred option.

Subject to available financing under SARIP, there is potential for the project to finance detailed design of the preferred option – however this potential activity has not been assessed at this time.

Plate 6: Crossing 1

Plate 7: Crossing 2

Plate 8: Crossing 3

Plate 9: Crossing 4

Plate 10: Broken seal edge

Plate 11: Broken seal edge

4.3.3 Potential Environmental and social impacts

4.3.3.1 Environmental (and Occupational Health Safety)

No significant environmental risks have been identified for the proposed Alafa'alava Road improvements. The works would occur within an existing road corridor that is highly disturbed from previous human activities.

Terrestrial biodiversity

The majority of land use along Alafa'alava Road is semi-rural agricultural or pastoral land. There are very few areas of intact native vegetation or old growth forest. Within and immediately adjacent to the road corridor, vegetation is dominated by grass, weedy shrubs, ornamental trees and planted gardens.

Freshwater biodiversity

The activities include rehabilitation of four bridges, however the extent and nature of these works is yet to be determined. It is likely that works in or around streams will be required which represents a risk to water quality and instream habitat. These risks should be considered during the ESIA process and appropriate mitigation measures developed.

Noise and dust

Noise and dust would be generated by construction activities however given the rural setting of Alafa'alava Road and the distance between residential dwellings any potential adverse impacts on the community could be minimized through standard construction mitigation measures.

Waste management

Waste generated from works along Alafa'alava Road would include:

- Potential demolition waste from rehabilitated bridge structures
- Minor excavated material that is not suitable for reuse as fill onsite
- Stripped asphalt from road surfaces
- General construction waste such as packaging, used oils and containers

The majority of waste generated from construction activities will be disposed at Tafaigata Landfill. However, waste management procedures stipulated in the construction environmental and social management plans will include any opportunities for separation of hazardous waste or reuse and recycling.

Occupation Health and Safety

Upgrade works along Alafa'alava Road would have the typical Occupational Health and Safety risks associated with road construction. This includes working around machinery and working in close proximity to a live road corridor. All contractors would be required to produce an Occupation Health and Safety Plan that covers their workforce for the duration of construction activities

4.3.3.2 Social

No significant social impacts have been identified. The area is sparsely populated and proposed rehabilitation works are expected to be small-scale and localized.

Land and Resettlement

Localized drainage improvements, road embankment and pavement repairs will be conducted within the existing road corridor. However minor land acquisition may be required to the establishment of

drainage easements or to fix alignment discrepancies. These activities will not impact any residential structures and impacts on other structures or economic assets are expected to be minor.

Land and resettlement impacts will be assessed once priority investments are confirmed and managed in accordance with the LARF.

Community Health and Safety

Alafa'alava Road rehabilitation works will include road safety design which is expected to contribute to improved road safety along the route.

The Construction phase community health and safety risks include road safety around work sites and risks hazards caused by construction equipment and worksites; anti-social behavior and SEA/SH associated with project workforce; increased risk of traffic incidents during construction. However these risks are expected to be low given the road is sparsley populated. Site/traffic safety will be managed through standard road construction safety measures. Risks associated with worker interation with the community (i.e. SEA/SH) will be managed through worker code of conduct, training and community awareness.

4.4 Summary of Screening Proposed Activities

Table 4-1 outlines the results of E&S screening of proposed project activities. This screening has been completed based on the results of the preliminary assessment (refer above) and should be reviewed and updated once the scope and details of these activities are confirmed.

Table 4-1 Screening of Proposed Sub-Project Activities

Sub-project/Activity	E&S Risk	Required E&S instruments
Component 1		
Site options study and detailed designs for climate resilience and safety investments at Faleolo International Airport	Designs to not take into consideration key environmental and social risks including: potential impacts on the intertidal area and lagoon marine environment and associated impacts on fisheries/cultural practices in this area. Stakeholders not appropriately identified and engaged and their feedback considered during conduct of study	E&S considerations/ requirements included in TORs ESIA to inform study E&S design standards/requirements Stakeholder consultation as per SEP/GRM
Updating the Samoa Aviation Sector Strategy for MWTI and Masterplan / Business Plan for SAA	Strategies/plans do not take into consideration key environmental and social risks. Stakeholders not appropriately identified and engaged and their feedback considered during development of strategies/plans	E&S considerations/ requirements included in TORs Stakeholder consultation as per SEP/GRM

Sub-project/Activity	E&S Risk	Required E&S instruments
Feasibility studies for the extension of the Faleolo International Airport runway.	Feasibility study does not take into consideration potential environmental and social impacts including noise impacts of the operation of an expanded runway on nearby sensitive receptors Community unrest due to failure to adequately consult with potentially affected communities	E&S considerations/ requirements included in TORs Stakeholder consultation as per SEP/GRM
Implementation of airport infrastructure and terminal upgrades and improvements to improve resilience of Faleolo International Airport to climate-relate hazards and/or events	Key environmental & social risks during construction including erosion of excavated areas and sedimentation of stormwater; occupational health and safety; community health and safety; disruption to businesses. Airport stakeholder dissatisfaction due to failure to adequately consult/notify.	ESMP Stakeholder consultation as per SEP/GRM LMP and Code of Conduct
Design and rehabilitation of seawall	Key environmental & social risks during construction including disturbance of the intertidal area; extraction and transport of rock material. Community unrest due to failure to adequately consult with potentially affected communities	ESMP Stakeholder consultation as per SEP/GRM LMP and Code of Conduct
Design and construction of boundary fence	Land disputes on airport boundary Design of fence not fit for purpose resulting in incursions and related community health and safety issues. Minor E&S risks during construction.	ESMP (including Land due diligence) Stakeholder consultation as per SEP/GRM LMP and Code of Conduct
Supply and installation of new navigation systems and automatic weather station	E&S risks associated with siting and installation	Due diligence ESMP
Regional airport asset maintenance contract	Environmental and social risks during operation not included in maintenance contract	E&S considerations/ requirements included in TORs [Above ESAs to include E&S risk measures for operation and maintenance]
Component 2		

Sub-project/Activity	E&S Risk	Required E&S instruments
East Coast Road: Design and rehabilitation	Key environmental & social risks during construction including: erosion and washout of construction areas, impacts to freshwater habitats during bridge/ford replacement; traffic disruption; land and resettlement impacts in urban areas; community health and safety; traffic disruption; disruption to businesses; impacts on utilities and disruption to services; impacts on visual amenity. Community unrest due to failure to adequately consult with potentially affected communities	ESMP RP Stakeholder consultation as per SEP/GRM LMP and Code of Conduct
Alafa'alava Road: Design and localised rehabilitation of priority sections	Key environmental & social risks during construction including: impacts to freshwater habitats during bridge rehabilitation; OHS risks; minor impacts on land and assets; and road safety during construction. Community unrest due to failure to adequately consult with potentially affected communities	ESMP Stakeholder consultation as per SEP/GRM LMP and Code of Conduct

5 SUB-PROJECT ENVIRONMENTAL SCREENING AND ASSESSMENT

5.1 Overview of screening process

The screening process will be used for all activities proposed for financing that are not identified and screened in this ESMF (refer Section 3.3).

The purpose of the screening is to:

- Determine whether activities are likely to have potential negative E&S risks and impacts.
- identify the relevant Environmental and Social Standards (ESS) and legislation requirements
- Identify the relevant documentation and tools that require preparation, disclosure, implementation and monitoring.

The sub-project activities that will be subject to E&S screening may include construction, operation, and decommissioning of civil works; technical assistance activities; procurement of goods and supplies; and communication and behavior change interventions.

The screening of activities will occur on an 'as needed' basis as activities are defined by the project team. Responsibility for implementing the screening process is outlined in Section 7.

5.2 Subproject/Activity Screening Procedure

Step One – Screening of Risks and Identification of Required Instruments
If the activity has been pre-screened as part of Chapter 3, proceed directly to Step 2.

Step 1 involves the completion of the E&S screening form (Annex I) to determine the risk profile for the sub-project, identify the relevant ESS and the type of E&S assessment required, including specific instruments/plans.

This step also requires checking that the activity is not listed as an ineligible activity in Table 5-1 below. This ineligibility criterion has been integrated into the E&S screening form.

Table 5-1 Ineligible sub-projects

Sub-projects will be deemed ineligible for project funding if they are:
• Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) adverse impacts; • Activities with substantial or high levels of environmental risk; • Activities that have high probability of causing serious adverse effects to human health and/or the environment • Activities with substantial or high levels of social risk; • Activities that involve significant permanent land acquisition and resettlement impacts • Activities that involve significant adverse impacts on cultural heritage;

Screening outcomes should be discussed with the project team and design personnel to identify ways to reduce or avoid any adverse environmental or social risks.

Step Two – Preparation and disclosure of documentation
If required, the next step is to prepare the relevant E&S instruments, both for Samoa and the WB processes. This process may include site visits and data gathering, consultation, and public disclosure of the documents in accordance with the SEP.

E&S assessments may be required by qualified independent consultants or technical specialists to identify the level of adverse impacts of sub-projects and appropriate mitigation and management measures.

Development Consent for the Planning and Urban Management Agency (PUMA) at MWTI may be required during this step. Sub-project E&S assessments, management plans must go through the WB no objection process and would accompany the PUMA Development Consent Application.

Step Three – Procurement
ESHS provisions will be incorporated into bidding documents in accordance with the new World Bank Procurement Framework.

Step Four – Implementation of Mitigation Measures
Mitigation and management measures outlined in the E&S documents and Development Consent Conditions will be implemented by Contractors and supervised by the construction supervision consultant or executing agency. Performance indicators should be defined to ensure the effectiveness of measures in place, which can be monitored and reported on throughout the project lifecycle. Training of implementing staff may be needed to ensure that conditions of the safeguards instruments are met.

Step Five – 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 ESS. Monitoring methods must provide assurance that safeguards measures are undertaken effectively. Some activities may require monitoring beyond the construction phase or project life to address maintenance, closure or rehabilitation issues and this will be determined during Step Three.

Bidding documents will confirm expected reporting intervals with Contractors, who will be required to submit regular reports on environmental indicators and any incidents that may have adversely impacted on the environment arising from the sub-project.

Six-monthly reports will need to be prepared and provided to the WB. The semi-annual monitoring reports to the Bank will include: (i) the status of the implementation of mitigation measures; and (ii) the findings of monitoring programs (iii) stakeholder engagement activities (iv) grievances log (v) any incidents/accidents with adverse impacts and the actions taken to address it and prevent reoccurrence.

5.3 CERC Safeguards Procedures

Disbursement of emergency financing under the CERC will be contingent upon: a) the recipient establishing a link between the disaster event and the need to access funds to support recovery and reconstruction activities (an “eligible event”); and b) submission to and no objection granted by the WB of an Action Plan of Activities. The Action Plan of Activities will include a list of activities, procurement methodology and E&S management procedures.

The Action Plan of Activities to be prepared following a disaster event will require consideration of E&S implications for any proposed emergency supplies procurement or reconstruction activities. The WB,

through the no objection process, will closely examine the nature of the proposed activities, particularly those involving civil works, to ensure (i) that they are not on the ineligibility list in Table 5-1 and (ii) that the recipient is aware of the required compliance documentation before initiating the process by which the proposed works will be prepared and implemented.

Preparation of the Action Plan of Activities will have regard to this ESMF and ESS requirements and will require WB approval prior to commencement of activities. The Action Plan of Activities will need to include:

- Procedures for consultation and disclosure,
- Integration of mitigation measures and performance standards into contracts and
- Supervision/monitoring and reporting of measures to ensure compliance.

6 PUBLIC CONSULTATION, INFORMATION DISCLOSURE AND GRIEVANCE REDRESS

6.1 Stakeholder Engagement, Information Disclosure and Grievance Mechanism

Stakeholder engagement and information disclosure will be used on the Project for managing two-way communication between the project team and stakeholders with the goal of improving decision making and building understanding. It is a core requirement of the Samoan Code of Environment Practice 3 and the WB's ESS10 Stakeholder Engagement.

To facilitate stakeholder engagement on the Project, a stand-alone Stakeholder Engagement Plan (SEP) has been prepared.

The SEP outlines how the project team will communicate with stakeholders throughout the life of the Project and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities. The SEP includes:

- Identifying all project stakeholders including their priorities and concerns, and ensuring the Project has processes to incorporate these priorities and concerns;
- Outlining strategies for information sharing and communication to stakeholders that are meaningful and accessible;
- Outlining the procedures and methodologies for stakeholder consultations documentation of the consultations and strategies for feedback;
- Establishing an accessible, culturally appropriate and responsive grievance mechanism.

The SEP will be revised and updated as necessary throughout project implementation to ensure the identified methods of engagement remain appropriate and effective in relation to the project context.

6.2 Project Stakeholders

Project stakeholders have been identified as follows:

Affected Parties
Affected parties include implementation agencies (LTA and SAA), local communities and other parties that may be subject to direct impacts for the Project.

Stakeholder Group	Stakeholder
Communities within the project vicinity 10 affected villages (ECR) 4 affected villages (Samoa Airport, Faleolo)	Matai/village leaders Project affected households Market vendors Local schools Local health centres Working age population
Road users	Motorists (including heavy freight transport/commercial and private) Public transport operators Pedestrians

Airport users	Passengers and families/friends People who work at airport
Government Ministries/Agencies	Ministry of Finance (MOF), Ministry of Works, Transport and Infrastructure (MWTI), Ministry of Women, Community and Social Development (MWCSD), Ministry of Communications and Information Technology (MCIT), Ministry of Natural Resources and Environment (MNRE), Samoa Water Authority (SWA), Electric Power Corporation (EPC), Samoa Trust Estates Corporation (STEC)
Business and utilities	Samoa Water Authority (SWA), Electric Power Corporation (EPC), Independent Water Scheme Association (IWSA), Digicel, Vodafone
Contractors	Supervision consultant Works contractors and sub-contractors

Other Interested Parties

Those individuals or groups that are unlikely experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. Interested parties include:

- NGOs
- Traditional media
- Participant of social media
- Politicians
- Public at large

Disadvantaged/Vulnerable groups

Within the Project, the vulnerable or disadvantaged groups take into consideration and are not limited to the following:

- Women
- Elderly
- Female-headed households
- Illiterate people
- Women and men with disabilities
- Vulnerable groups working in the informal economy, who are mostly women.
- Those who identify with diverse sexual orientation and gender identities and expression (SOGIE, including *fa'afafine*).

6.3 Stakeholder Engagement During Project Preparation

During project preparation, consultations were undertaken to inform development of the ESMF including this SEP. It involved meetings with stakeholders as well as community. Table 6-1 below provides a list of meetings and consultations held during the preparation stage. Feedback and issues raised from these consultations is documented in the Project SEP and LARF. Further meetings will be held between the project team to finalize the safeguards instruments.

Table 6-1 Consultations/Meetings held during the preparation stage of the project

Date	Type of meeting/consultation	Purpose/Message	Stakeholders
12 October 2021	Stakeholder consultation	Consultation with key project stakeholders to inform them about the project scope, implementation requirements as well as their roles and responsibilities in the overall implementation of the project to improve coordination. Information on the importance of developing an ESMF and other safeguards instruments was also shared.	WB, CTSSU Government; TISCD, SAA, LTA, MNRE, MWTI, PUMA, MCIT, MWCSD Non-Profit Organization; NOLA
14 October 2021	Community consultation	This community consultation was for the Aviation component. It was held at the SAA Main Conference Room. Information on the project scope was also shared. Emphasis was placed on community health and safety, SEA/SH and gender aspects, and involvement of communities in the overall implementation of the project.	TISCD, SAA, LTA, 4 villages around the airport
19 October 2021	Community consultation	Community consultation for the Road Component. It was held at the Elisa Hotel in Apia.	TISCD, LTA, MNRE 10 villages along ECR

Several issues regarding resettlement impacts were raised during these consultations and are summarized below;

Concerns raised during the SAA community consultation:

- A participant questioned whether the project would be able to extend the airport seawall to neighboring villages.
- A participant whose land is in close proximity of the project site had questioned whether the project will affect his land and if there is any land taking process to be followed in the event his land is required for the project.

Concerns raised during the LTA community consultation:

- There were a few questions about how the project will improve drainage systems along ECR whether easements and road drainage systems will be reconstructed under SARIP.
- The client responded that easements and drainages will be included under this project. Easement agreement for affected families will also be prepared for signing before works commence.
- A participant questioned if the road will be moved and constructed away from the current road alignment. He also asked whether there was a study conducted to construct an inland road as an emergency route instead of reconstructing the ECR.
- The client responded that the reconstruction of the road will be aligned within the Government reserve and may be realigned with the existing road depending on the survey plan and later on design. Acquiring additional land outside of the existing road alignment or road reserve to cater

for sensitive areas, if required, can also be done. Funding for the construction for an inland route was not available as the client proposed the ECR given its many hazards and setbacks to the community. The client will also note this down and discuss with the responsible stakeholder.

The draft ESMF and draft SEP were provided to the executing and implementing agencies for their review and comment. The ESMF, SEP, LMP and LARF were disclosed on the LTA and SAA websites in January 2022.

6.4 Stakeholder Engagement During Project Implementation

The Project SEP outlines a plan for consultation and information disclosure during project implementation. Engagement will occur at multiple stages of project implementation and will involve a number of different tools and techniques depending on the intended audience. As required, the project team will undertake engagement and disclose information in Samoan and in a format appropriate to the target audience.

All engagement activities with project affected communities will actively seek involvement of Village Woman's Committees. Village Woman's Committees operate with inclusive practices at the village level and reach all village members including vulnerable and disadvantaged groups.

As the project progresses, key messages will be developed and updated via meetings between the implementing agencies and executing agencies. These key messages will be disseminated to all project team members and used in information disclosure and stakeholder engagement activities. This will ensure consistency across all communication and engagement activities regarding the information shared with communities and stakeholders.

Should community transmission of Covid-19 become established in Samoa, a precautionary approach will be taken to the consultation process to prevent potential spread of the virus. The Project will conduct all stakeholder engagement activities in accordance with GoS COVID19 rules and guidelines.

6.5 Grievance Redress Mechanism

SARIP's GRM is outlined in the Project's SEP. The GRM has been established in accordance with the World Bank requirement and acts as a transparent mechanism that aims to record, manage and resolve any complaints, concerns and grievances in a timely, effective and efficient manner and ensure that a satisfactory resolution is reported back to the complainant. Furthermore, the GRM also builds trust and cooperation as an integral component of broader community consultation that facilitates correct action.

The overall GRM process is depicted in the flow chart in Figure 5-1. The Project's GRM also includes a process for handling cases of SEA/SH. This process will be further operationalized during project implementation, incorporating key elements for responding to cases of GBV and SEA/SH as outlined in the Project's SEA/SH Action Plan (refer Annex III).

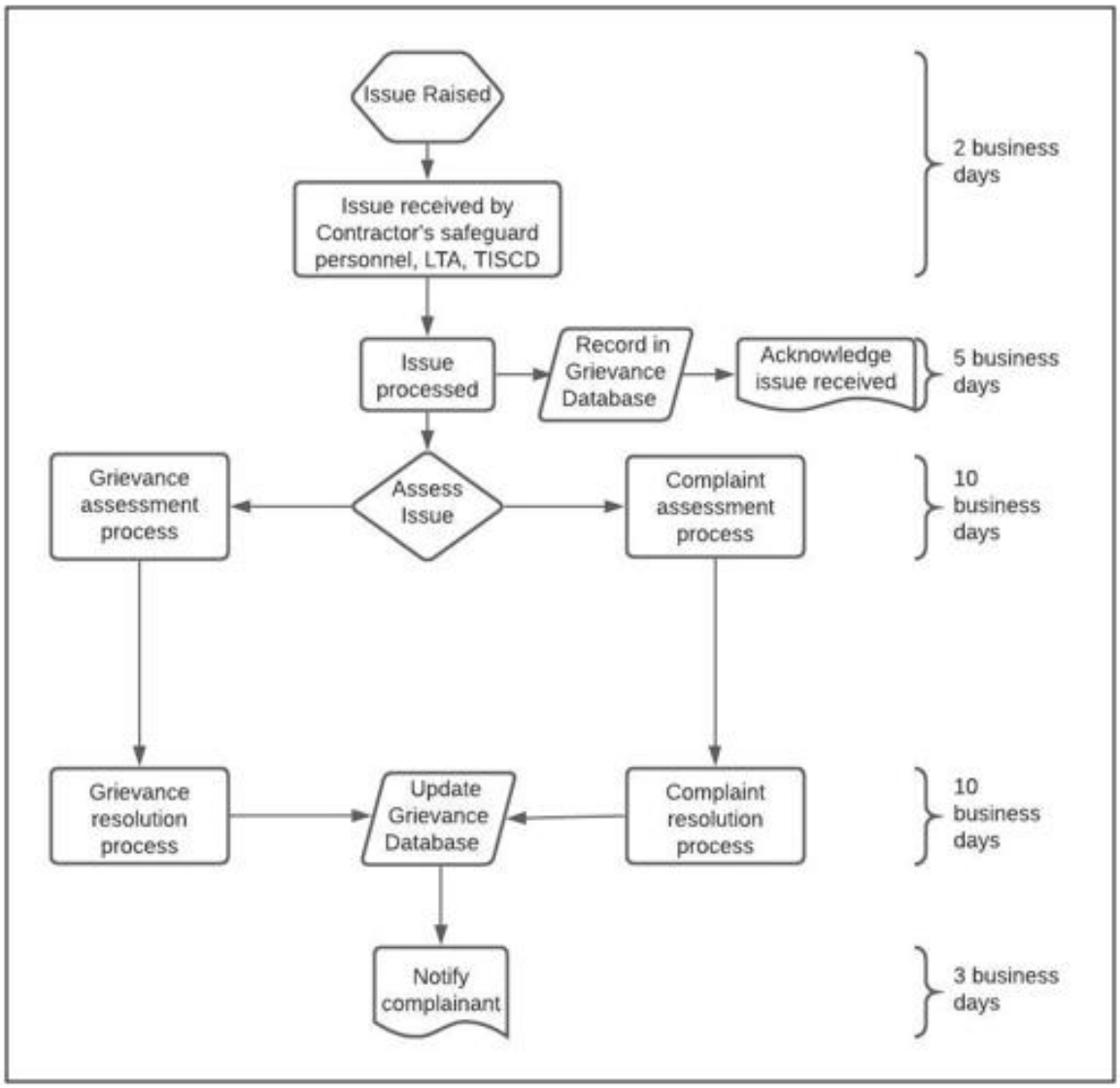

Figure 5 GRM Flow Chart

7 E&S IMPLEMENTATION ARRANGEMENTS

7.1 Project Implementation Arrangements

Project implementing arrangements are outlined in Figure 6-1 and include:

- The Ministry of Finance as the Executive Agency, overall focal point for SARIP and implementing agency for Component 4 - CERC
- The Samoan Aviation Authority as implementing agency for Component 1 - Aviation
- The Land Transport Administration as implementing agency for Component 2 – Roads

SAA and LTA will also implement respective activities under Component 3 – Strengthening Enabling Environment.

These implementing agencies will be responsible for the day-to-day implementation of SARIP and will be assisted by two tiers of centralized implementation support, namely the Centralized Technical Services and Support Unit (CTSSU) within MOF and the Transport Infrastructure Sector Coordination Division (TISCD) within the Ministry of Works, Transport and Infrastructure (MWTI).

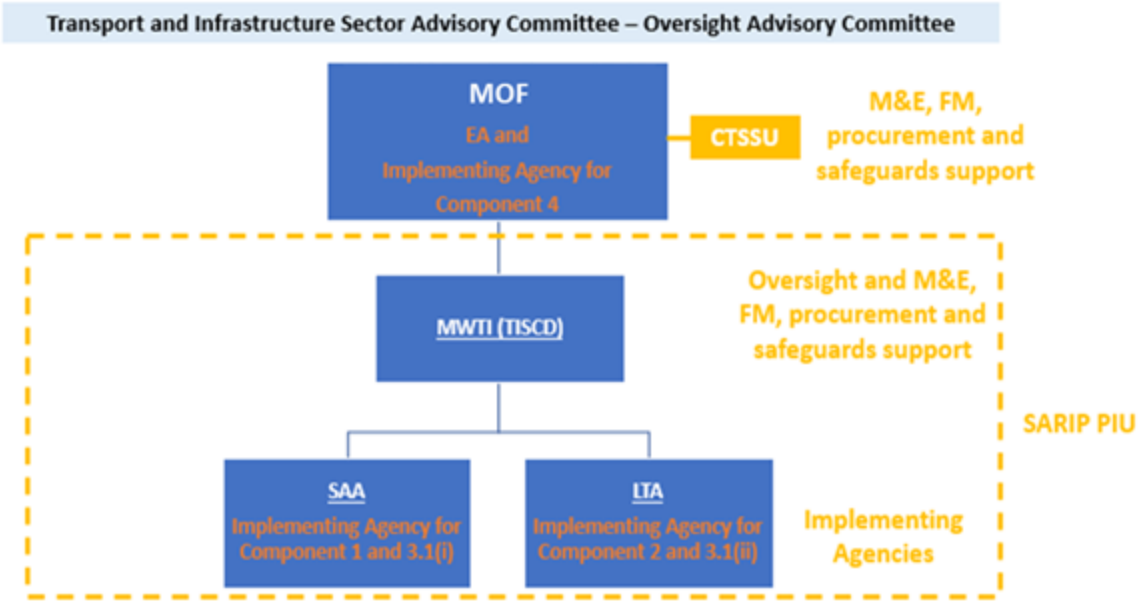

Figure 6 Project Implementing Arrangements

7.2 E&S Roles and Responsibilities

7.2.1 MOF - CTSSU

The CTSSU includes an existing International Safeguards Specialist based in Samoa and employed by MOF. The CTSSU safeguards specialist provides high level support and guidance on E&S safeguards to the TISCD and IAs in terms of conducting E&S safeguards audits, drafting and reviewing of safeguards instruments/documentation such as ESMF and other safeguards tools and most importantly, capacity

development through trainings and workshops on the implementation of safeguards principles and instruments. CTSSU safeguards specialist also maintains close communication with WB safeguards team to ensure the Bank team is regularly updated and any issues arising from project implementation are resolved in a timely manner.

7.2.2 MWTI - TISCD

The TISCD safeguards specialist provides next level support to the IAs. The TISCD safeguards will assist the IAs with the preparation and review of any safeguards documentation, consultations and coordinate safeguards update meetings with main project stakeholders including MNRE and MWCSD. The TISCD will also assist during E&S safeguards audits, site visits and other onsite activities to ensure that the Bank safeguards policies and national safeguards standards are adhered to by the Contractors. Similar to other ongoing WB projects, the TISCD will be responsible for compiling safeguards semiannual reports for all safeguards activities occurring throughout every 6 months.

7.2.3 SAA

SAA will establish a Project Implementing Unit consisting of a Project Manager, Project Officer, Project Procurement Officer and Project Accountant. The individual focal point within SAA will be the PIU Project Manager. The safeguards specialists in CTSSU and TISCD will provide support to SAA regarding project-related E&S safeguards matters. E&S instruments will be developed by Design and Supervision Consultants (refer below). The SAA PIU team work with the D&S consultants to oversee the daily E&S aspects of this Component including overall monitoring of construction works to ensure safeguards is properly implemented by Contractors and provide regular updates to WB, CTSSU, and TISCD.

7.2.4 LTA

The LTA's existing Project Management Division (PMD) will be responsible for day-to-day implementation of components 2 and 3.2. The individual focal point within the LTA will be the PMD Project Manager. The LTA has a team of safeguards specialists housed under the LTA's PMD. The safeguards team oversees all safeguards works for ongoing donor-funded projects managed by LTA. The LTA safeguards team will be responsible for the implementation of this ESMF for Component 2. E&S instruments will be developed by Design and Supervision Consultants (refer below). The LTA E&S team will work closely with the D&S consultants and contractors to ensure safeguards policies, measures and standards are applied correctly.

Table 7-1 Key responsibilities for implementation

	Tasks	**Responsible Party**
Scoping	Review and clearance of ESMF	WB
	Disclose ESMF	WB/TISCD/SAA/LTA
	Eliminate all activities that are included in Table 3	SAA/LTA
	Confirm consultations are adequate	WB
Screening	Screen all proposed activities for adverse E&S impacts based on scoping exercise with Safeguard Screening Form (Annex IX) and categorise sub-projects	SAA/LTA
	Screening records filed for review	SAA/LTA
	Review screening process	WB

	Tasks	Responsible Party
Sub-project Preparation and Design	Undertake field surveys to inform sub-project design and EA, RP and EMP as required	SAA/LTA/TISCD/ CTSSU
	Design sub-project and activities in accordance with national and international standards and COEPs	SAA/LTA/TISCD/ CTSSU
	Approve EMP	WB/SAA/LTA
	Prepare documentation or arrange/organize for preparation of documentation (i.e., EAs, EMPs, RP, etc.) for each sub-project, in accordance with ESMF and national legislation and agreements	SAA/LTA/TISCD
	Support review process and documentation	WB
	Disclose draft documents in country	TISCD/SAA/LTA
	Undertake consultation with stakeholders and affected peoples as required	SAA/LTA/TISCD/ MWCSD/MNRE
	Incorporate mitigation measures and stakeholder feedback into design	SAA/LTA
	Review and approval of design and EMP (and update existing EMPs if necessary)	SAA/LTA/MNRE
	Prepare cost estimates	SAA/LTA
	Approve budget	MOF
	Review safeguards instruments and confirm consultation process was adequate	WB
	Clearance of safeguard instruments	WB
	Effective implementation of mitigation measures required in EMP and ARAP	SAA/LTA/MNRE
	Update safeguard instruments in consultation with affected people when technical specifications are finalized	SAA/LTA/TISCD
	Establish grievance focal point and address grievances	SAA/LTA
	Disclose final safeguard instruments	TISCD/SAA/LTA
	Document the implementation of safeguard measures	TISCD/SAA/LTA
	Periodic supervision of implementation process, safeguards and progress reports	WB
Capacity Building	Deliver safeguards training or support where necessary	CTSSU/WB
	Clear TORs for consultants to ensure outputs meet safeguard requirements	WB
	Supervision and monitoring compliance with EMP (including ongoing maintenance) and ARAP	SAA/LTA/MNRE

7.2.5 Design and Supervision Consultants

Design and Supervision Consultants will be contracted for all major works sub-projects. The D&S consultations will include qualified environmental, social and occupational health and safety specialists who will assess, plan and oversee the implementation of E&S measures. D&S consultant TORs will also include the provision of training and capacity building services to IAs and to Contractors.

7.2.6 Construction Contractors

The Contractor(s) should have a designated E&S specialist/officer always onsite during construction phase. He/she will oversee and keep records of all safeguards activities of the construction works and provide regular update reports to LTA.

7.3 Capacity Building

The key agencies involved in the implementation of safeguards for SARIP are LTA, SAA, TISCD, CTSSU and MOF. The team members have vast experience in implementation of donor-funded projects. Generally, the LTA, TISCD and CTSSU have a range of experience in different technical safeguard-related areas including biodiversity conservation, environmental and social sciences, and public communication and awareness.

The CTSSU safeguards specialist will provide on-ground capacity building support to TISCD and IAs through training and technical assistance to implement the project safeguards instruments. The CTSSU safeguards specialist will undertake annual capacity needs assessment that will inform preparation and implementation of a capacity building plan for E&S risk management with the following outcomes:

- All project staff familiar with all E&S instruments
- Grievance mechanism established and operating effectively
- E&S, risk management measures, integrated into Project activity designs
- E&S risk management measures integrated into bidding and contracting documents
- Contractors and suppliers understand and can implement their E&S obligations Improved environmental health, safety, and sanitation to the project staff and beneficiaries

Additional training and capacity support from external specialists will be provided under Component 3 in the areas of project management (including E&S project management); occupational health and safety, and SEA/SH prevention.

7.4 Implementation Budget

SARIP E&S staffing will be predominately financed by the GoS. This includes the LTA Principal Safeguards Specialist, LTA Safeguards Specialist, and SAA staff assigned with E&S responsibilities. Financing for the TISCD Principal Safeguards Specialist is currently covered under SCTRP and will be financed by the GoS once SCRTP financing ends. Financing for MOF's CTSSU Safeguards Specialist is covered through the Samoa Agriculture and Fisheries Productivity and Marketing Project (SAFPROM).

The preparation and implementation of the sub-project E&S instruments are financed under the project envelope under relevant technical assistance, design and supervision, and works contracts.

SARIP Budget will also finance the following:

- Gender and SEA/SH activities
- OHS capacity building activities
- Operational budget for E&S consultation and supervision.

ANNEXES

Annex I: E&S Screening Form

This form is to be used by the IAs to screen potential environmental and social safeguards risks and impacts of a proposed activity/subproject, determine the level of risk and the type instrument to be prepared or follow-up action to be taken. It will help the IA in identifying the relevant Environmental and Social Standards (ESS), establishing an appropriate E&S risk rating for these subprojects and specifying the type of environmental and social assessment required, including specific instruments/plans.

This form is for all 'other' activities not already pre-screened in Chapter 3 the ESMF. Before screening, also check that the activity is not listed in Ineligible Activity List (Chapter 4).

Use of this form will allow the IA to form an initial view of the potential risks and impacts of a subproject***. It is not a substitute for project-specific E&S assessments or specific mitigation plans.***

The completed forms will be signed and kept in the Project ESF file and included in the ESF implementation progress report to be submitted to World Bank (WB) per the schedule as agreed with WB.

Subproject/Actvity Name	
Subproject Location	
Subproject Proponent	
Estimated Investment	
Start/Completion Date	

Questions	Answer		ESS relevance	Due diligence / Actions
	Yes	no		
Does the subproject involve civil works?			ESS1	ESIA/ESMP, SEP, GRM LMP
Does the subproject/activity have substantial or high levels of environmental risk			ESS1	If yes – Not eligible
Is the subproject/activity expected to cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) adverse impacts			ESS1	If yes – Not eligible
Does the subproject/activity have a high probability of causing serious adverse effects to human health and/or the environment			ESS1	If yes – Not eligible
Does the subproject/activity have substantial or high levels of social risk;			ESS1	If yes – Not eligible
Does the subproject/activity involve land acquisition and/or restrictions on land use?			ESS5	RP and SEP
Does the subproject/activity affect economic assets and livelihoods			ESS5	RP and SEP
Does the subproject/activity involve significant physical relocation or economic displacement			ESS5	If yes – Not eligible
Does the subproject/activity involve recruitment of workers including direct, contracted, primary supply, and/or community workers?			ESS2	LMP
Does the subproject/activity present OHS risks to workers				ESIA/ESMP and LMP

Questions	Answer		ESS relevance	Due diligence / Actions
	Yes	no		
Does the subproject have a GM in place, to which all workers have access, designed to respond quickly and effectively?				Project GRM
Is the subproject located within or near any ecologically sensitive areas?			ESS6	ESIA/ESMP, SEP (potentially ineligible)
Is the subproject located within or near any known cultural heritage sites?			ESS8	ESIA/ESMP, SEP (potentially ineligible)
Does the project area present considerable Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) risk?			ESS1	SEA/SH prevention measures

Conclusions:

1. **Proposed Environmental and Social Risk Ratings (High, Substantial, Moderate or Low). Provide Justifications.**

2. **Proposed E&S Management Plans/ Instruments.**

Sign by Subproject/activities owner: ……
Position: ……Date ……..

Sign by: ……

Position: ……Date:……

Annex II: Chance Finds Procedures

Cultural heritage includes tangible or intangible heritage with archaeological, paleontological, historical, architectural, religious, aesthetic or other cultural significance. Tangible heritage items they may be encountered during implementation include moveable or immovable objects, sites, structures, groups of structures, natural feature and landscapes.

The list of negative activity attributes which would make an activity 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 MNRE take over;
(d) Notify the supervisory Engineer who in turn will notify the responsible local authorities and the MNRE;
(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 finding 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 III: Sexual Exploitation and Abuse & Sexual Harassment Action Plan (SEA/SH)

1. BACKGROUND

SEA and SH Action Plan outlines the strategies that SARIP will adopt to mitigate and respond to risks of SEA / SH related to the project in line with the World Bank's *Good Practice Note Addressing SEA and SH in Investment Project Financing Involving Major Civil Works*[5].

The project was assessed as 'low' risk using the World Bank's SEA / SH Risk Screening Tool.

SARIP consists of small-scale infrastructure works located in defined project sites, in peri-urban settings on the main island of Samoa:

- Faleolo International Airport (Upolu Island).
- East Coast Road, part of the main road link from Apia to the eastern half of Upolu Island.
- Alafa'alava Road, an existing inland road linking Apia with the north-western corner of Upolu Island and Faleolo Airport which provides an alternative route to the West Coast Road.

Three relatively small construction workforces are expected to be contracted.

SARIP will build on the SEA / SH Action Plan for the Samoa Climate Resilient Transport Project (SCRTP) being implemented by the Ministry of Works, Transport and Infrastructure (MWTI), Land Transport Authority (LTA), Samoan Air Authority (SAA). IAs will enlist the support of the Ministry of Women and Community Development (MWCD) to assist in the implementation of SEA/SH Action Plan.

2. RISK MITIGATION (PREVENTION)

2.1 Codes of Conduct

The Code of Conduct shall be signed by all employees of contractors (including sub-contractors), supervising Engineers and other consultants to indicate that they have:

- Received a copy of the Code of Conduct;
- Had the Code of Conduct explained to them;
- Acknowledged that adherence to the Code of Conduct is a condition of employment; and
- Understood that violations of the Code of Conduct can result in serious consequences, up to and including dismissal, or referral to legal authorities.

A copy of the Code shall be displayed in locations that are easily accessible to the communities surrounding the project.

The Codes of Conduct should be available in English, Samoan and any language of foreign project staff.

2.2 Code of Conduct induction

All employees of contractors (including sub-contractors), supervising Engineers and other consultants will attend an induction session on:

- The SEA / SH components of the Code of Conduct, and what constitutes a violation of the Code of Conduct to set clear expectations of behavior.

[5] World Bank, 2020. Good Practice Note: Addressing Sexual Exploitation and Abuse and Sexual Harassment in Investment Project Financing involving Major Civil Works. World Bank: Washington, United States of America.

- What may happen if they use SEA or SH in violation of the Code of Conduct.
- How to report SEA or SH / a violation of the Code of Conduct.
- What local specialist gender-based violence (GBV) service providers are available to survivors and how to contact them.

2.3 Community awareness-raising

Awareness-raising activities for the whole community, ensuring the participation of women, women and men with disabilities, people who identify with diverse sexual orientations and gender identities and expressions (SOGIE) and other groups in the community who are more likely to experience SEA or SH, will be conducted primarily by the MWCD.

At a minimum, awareness-raising with increase beneficiaries and communities understandings of:

- The SEA and SH components of the Code of Conduct, and what constitutes a violation of the Code of Conduct.
- How to report SEA or SH / a violation of the Code of Conduct.
- What local specialist GBV service providers are available to survivors and how to contact them.
- What to expect when making a complaint of SEA or SH to the project.
- The limitations of the grievance redress mechanism in relation to complaints GBV.

3. RISK RESPONSE

The Project Grievance Mechanism will include details of how reports of GBV, including SEA / SH, will be received, resolved, and documented. The following elements will be integrated into the GM to respond to cases of GBV, including SEA / SH:

Principles	The process to receive and respond to complaints of GBV, including SEA / SH, will apply a survivor-centered approach to ensure that the rights of the survivor are upheld. This includes ensuring the survivor's safety, choice, consent and confidentiality and to ensure that the survivor is informed, respected and referred to specialist GBV services. The process will also be accessible, transparent, timely and fair.
Receiving complaints of GBV, including SEA / SH	The GM must be accessible to survivors of GBV, including SEA / SH. This means: - Having multiple reporting methods and contacts including at least one woman who can receive complaints for each Project Site. - Outlining how third-party reports will be responded to. - Having a referral pathway for each Project Site to refer any survivors to the closest specialist GBV service providers. - Increasing the awareness of communities that will interact with project workers on how to access the GM.
Resolving complaints of GBV, including SEA / SH	The GM should include a clear process to resolve the complaints of GBV, including SEA / SH, which is survivor-centered. This includes processes to: - Assess if the allegation is likely linked to the SARIP. - Verify the allegation to: o Determine the likelihood that the incident occurred. o Recommend disciplinary measures toward the alleged perpetrator.

	- Ensure the survivor can speak to one person through the process, in most cases the contact person should be a woman. The GM will also clearly articulate that reports of GBV will not be resolved using customary practices of conflict resolutions, such of medication and compensation.
Recording complaints of GBV, including SEA / SH	The GM will outline how information of reports of GBV, and actions taken to resolve the complaint, will be collected and stored confidentiality and ensure the information is not shared outside necessary reporting requirements The GM will also include details of required notification to the World Bank Task Team with only the following data to be shared: - The nature of the allegation. - If the alleged perpetrator is, to the survivor's best knowledge, associated with the Project (yes/no). - The survivor's age and/or sex (if available). - If the survivor was referred to services.
Training	Anyone receiving or handling complaints of GBV must receive training so that they do not revictimize and retraumatize survivors or unintentionally cause them harm. Those who have been identified to receive complaints of GBV will complete training to: - Understand the gendered nature of SEA and SH, the GBV requirements in the Code of Conduct and the GBV pathway in the GM. - Have the skills to receive complaints of GBV. Those tasked with resolving incidents of SEA / SH will also complete training to develop their skills to receive, resolve and record complaints of GBV.

4. IMPLEMENTATION AND MONITORING

Action	Responsibility	Oversight	Monitoring (target; method/frequency)
Risk mitigation (prevention)			
SEA / SH risk prevention and response requirements included in implementing partner agreements/contracts.	SAA and LTA.	MWTI	All agreements/contracts; sited (once-off).
Project Workers sign a Code of Conduct that explicitly prohibits SEA / SH.	Contractors.	SAA and LTA.	All workers; human resources (HR) records/progress reporting (semi-annually).
Project Workers complete an induction on the SEA / SH components of the Code of Conduct.	Contractors facilitated by MWCD.	SAA and LTA.	All workers; HR records/progress reporting (semi-annually).
Community awareness sessions on the Code of Conduct and how to make a report of SEA / SH to the project.	Contractors facilitated by MWCD.	SAA and LTA.	All communities; progress reporting (semi-annually).
Risk response			
The project GM includes a pathway for receiving complaints of SEA / SH.	MWTI, SAA and LTA.	World Bank.	All Project Sites; progress reporting (semi-annually).

IAs and contractors assign/train staff to handle SEA / SH related complaints.	Contractors, SAA and LTA.	World Bank.	All IP, IA and Project Sites; progress reporting (semi-annually).

Annex IV: CESMP Content Outline

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