

FSM Skills and Employability Enhancement Project (SEEP)

Federated States of Micronesia

PRELIMINARY ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP) FOR FSM SKILLS ACADEMY (FSA) (formally Pohnpei Agriculture and Trade School - PATS)

FINAL DRAFT

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ABBREVIATIONS

CESMP	Contractors Environmental and Social Management Plan
CoC	Code of Conduct
COM	College of Micronesia
CIU	Central Implementation Unit - DoFA
CTE	Career & Technical Education
CTEC	Career & Technical Education Center
DoFA	Department of Finance and Administration
DoTC&I	Department of Transportation, Communication and Infrastructure
EA	Executive Agency
E&S	Environmental and Social
ESA	Environmental and Social Assessment
ESCP	Environmental and Social Commitment Plan
ESF	World Bank Environmental and Social Framework
ESMP	Environmental and Social Management Plan (for PATS)
ESS	World Bank Environmental and Social Standards
ESRC	Environmental and Social Risk Classification
ESRS	Environmental and Social Review Summary
FMI	Fisheries and Maritime Institute (FSM Government)
FNFED	Formal and Informal Education Divisions
FPIC	Free, Prior and Informed Consent
FSM	Federated States of Micronesia
FSA	FSM Skills Academy
GGE	Greenhouse Gas Emissions
GIIP	Good International Industry Practice
GoFSM	Government of FSM
GM	Grievance Mechanism
ha	Hectares
HSMP	Health and Safety Management Plan
HWMP	Hazardous Waste Management Plan
IA	Implementing Agency
LoL	Inventory of Loss
JSA	Job Safety Analyses
km	Kilometers
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation

MToT	Training of Master Trainers
NDOE	National Department of Education
NGO	Non-Governmental Organisation
ODA	Overseas Development Assistance
OHS	Occupational Health and Safety
PAP	Project Affected Person
PATS	Ponape (Pohnpei) Agriculture & Trade School
PIU	Project Implementation Unit within NDOE
PMU	Project Management Unit
PPA	Project Preparation Advance
PRCC	Pohnpei Roman Catholic Church
PSC	Project Steering Committee
RF	Resettlement Framework
RPL	Recognition of Prior Learning
SDOE	State Department of Education
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SEEP	Skills and Employment Enhancement Project
SH	Sexual Harassment
SIP	Social Interaction Plan
SMP	Spill Management Plan
TMP	Traffic Management Plan
TOR	Terms of Reference
ToT	Training of Trainers
TVET	Technical and Vocational Education and Training
WB	World Bank
WMMP	Waste Minimization and Management Plan
WMP	Waste Management Plan

1. Introduction

1.1. Environmental and Social Assessment Overview

The Government of Federated States of Micronesia (GoFSM) has applied for financing from the World Bank (WB) for the FSM Skills and Employability Enhancement Project (SEEP) to improve the quality of and equitable access to secondary Technical and Vocational Education and Trainings (TVET), and to improve access to and effectiveness of employment support programs. Part of the SEEP includes the assessment of environmental and social risks and the preliminary preparation of environmental and social instruments in accordance with the WB Environmental and Social Framework (ESF); These include;

- (i) Preliminary Environmental and Social Management Plan (ESMP) for the FSM Skills Academy (FSA) formerly Pohnpei Agriculture and Trade School (PATS).
- (ii) Labor Management Procedures (LMP).
- (iii) Stakeholder Engagement Plan (SEP).
- (iv) Environmental And Social Commitment Plan (ESCP).

The GoFSM through the National Department of Education (NDOE), with assistance from the FSM Department of Financial Administration (DoFA) Central Implementation Unit's (CIU) safeguard team have undertaken the preparation of the instruments required for WB appraisal.

1.2. Environmental and Social Management Plan (ESMP)

1.2.1. Purpose and Scope of the FSA ESMP

As outlined in the World Bank Environmental and Social Framework 2017 (ESF), the purpose an Environmental and Social Management Plan (ESMP) is an instrument that details (a) the measures to be taken during the implementation and operation of a project to eliminate or offset adverse environmental and social impacts, or to reduce them to acceptable levels; and (b) the actions needed to implement these measures.

This ESMP covers the design, construction and operation of the renovation works associated with the revitalization of the former PATS campus, under Component 2 of the SEEP Project.

This version is "preliminary", based on information known at the time of the WB Project Appraisal. The ESMP will be finalized during the detailed design phase and will be cleared by the WB prior to the finalization of the design and the Contractor's bid documents.

1.2.2. Links with Other Documents

This preliminary ESMP is just one of several Environmental and Social (E&S) instruments developed to support management of the E&S aspects of the SEEP project. Other key E&S preliminary instruments prepared for the SEEP projects include:

- SEEP Stakeholder Engagement Plan (SEP), December, 2021.
- SEEP Labor Management Procedures (LMP), December, 2021.
- Environmental and Social Commitment Plan (ESCP), December, 2021.

2. PROJECT BACKGROUND and DESCRIPTION

2.1. Overview of the SEEP Project

The labor market of the Federated States of Micronesia (FSM) is characterized by relatively low formal employment, high unemployment, and a high share of migrant labor. The FSM labor market is further struggling with the challenges of high formal sector unemployment (especially among youth), largely driven by persistent skills gaps. The public sector is the main employer in FSM, with about 39 percent of formal employment located in public administration.

There are equity issues related to youth living in outer islands of FSM. Due to the significant distances between islands and lack of regular and reliable island connectivity, geographic barriers persist to those living in outer islands. In higher grades, students may need to relocate to attend school and are housed either in dormitories or with host families.

Technical and Vocational Education and Training (TVET) options are both limited and fragmented. At the secondary level, TVET is primarily provided via the public school system, focusing on occupational preparation via theory and practical skills training. Programs were once available in 29 high schools but were discontinued in most of these facilities due to lack of teaching staff and outdated equipment.

At the post-secondary level, TVET is available through College of Micronesia (COM-FSM) and the affiliated FSM Fisheries and Maritime Institute (FMI). The COM-FSM Career and Technical Education Center (CTEC) include continuing education classes, English, business management, building technology, customer service, computer skills and cultural courses such as dance and local languages. Non-formal TVET is largely provided and managed by a multitude of NGOs, civil society organizations and faith-based organizations on an ad-hoc basis: Current communications between the private sector, government and educational providers is limited, and data on labor market needs, outcomes and skills gaps are unavailable or outdated.

The National Department of Education (NDOE) of the FSM works in collaboration with the four State Departments of Education (SDOEs) and is responsible for setting national standards around teacher certification and school accreditation; school curriculum standards and benchmarks; student assessments; special education; coordinating foreign assistance; and providing training and other assistance to the states.

SDOE retain authority to set their own curricula, tests and standards and are responsible for instruction, while catering to linguistic and cultural diversity. There is currently no dedicated TVET board, and the TVET policy needs revision. Coordination between employers, TVET graduates and education providers is poor.

Technical and vocational education and training (TVET) options are both limited and fragmented in FSM. At the secondary level, TVET is referred to as Career and Technical Education (CTE) and is primarily provided via the public school system in each State. CTE programs begin with introductory courses in grade 7 and 8, and from grades 9 to 12, CTE focuses on occupational preparation via theory and practical skills training. CTE programs were once available in 29 high schools but were discontinued in most of these facilities due to lack of teaching staff and outdated equipment. In most cases, current CTE programs are limited to two 45-minute lessons per week.¹ At the post-secondary level, TVET is available through COM-FSM and the affiliated FSM Fisheries and Maritime Institute (FMI) which offers certificate level courses of 2 years duration in marine engineering, navigation, and fishing technology. The COM-FSM Career and Technical Education Center (CTEC) include continuing education classes, English, business management, building technology, customer service, computer skills and cultural courses such as dance and

¹ National Department of Education. 2020. "Education Sector Strategic Development Plan 2020-2024". Palikir: FSM National Government.

local languages.² It is also possible for employers or others to request short skills training classes on particular topics with a minimum class size of ten. Non-formal TVET is largely provided and managed by a multitude of Non-Government Organizations (NGOs), civil society organizations and faith-based organizations on an ad-hoc basis: such courses are generally short-term (up to a week or two in length) and focus on upskilling and capacity building of employees. There is little strategic direction or coordination across the sector, and there is often no linkage between CTE courses taught at the secondary level and CTEC courses available at state COM-FSM campuses. Communication between the private sector, government and educational providers is virtually non-existent, and data on labor market needs, outcomes and skills gaps are unavailable or outdated.³

2.2. SEEP Investment and Activities Summary

The proposed SEEP Project is closely aligned with Regional Partnership Framework (RPF) for FY17-FY21 (extended through FY23) which outlines the World Bank Group strategic program for nine Pacific island countries including the FSM. The RPF identifies four areas of focus: (1) fully exploiting the available economic opportunities; (2) enhancing access to employment opportunities; (3) protecting incomes and livelihoods; and, (4) strengthening the enablers of growth and opportunities (macro-economic management, infrastructure and addressing knowledge gaps). The Project's scope is closely aligned with the second focus area, specifically objectives 2.1. (Broadened opportunities for access to labor markets) and objective 2.2. (Addressing education and skills gaps).

The projects development objective is to “Improve quality of and equitable access to secondary education and skills trainings, and improved access to and effectiveness of employment support programs”.

Against the background described above and its development objective, the SEEP Project will implement the four components:

Component 1: Improving equitable access to vocational education and training.

Activities will support expanding the availability of quality skills training (both-short term and long-term) while providing incentives and support to increase participation of under-represented and disadvantaged groups (such as poor and vulnerable youth, women, persons with disabilities, and geographically disadvantaged Micronesians). Including three subcomponents;

- Component 1.1. Provision of Financial Support for Disadvantage students.
- Component 1.2. Provision of Grants to TVET Institutions.
- Component 1.3. Targeted Outreach and Information Campaigns to Vulnerable groups on TVET Opportunities.

Component 2: Improving the relevance and quality of TVET.

The objective of this component is to enhance the relevance and quality of training offered by TVET institutions by upgrading the training curricula and its standards; improving the quality of trainers; and making provisions for independent testing and certification of skills. The enhanced training will be delivered primarily through a high quality, flagship TVET institution—to be named the FMS Skill Academy (FSA)—that will be established in the premises of the now closed Ponape Agriculture and Trade School (PATS), building upon the infrastructure of the erstwhile school. The project will also help improve the relevance and quality of TVET in other high schools across the country that offer TVET courses, including the four schools targeted to receive performance grants under component 1.2, by giving them access to the enhanced training curricula,

² <http://www.comfsm.fm/?q=pohnpei>

³ Feedback provided during stakeholder discussions.

providing training opportunities to TVET teachers, and supporting the skills testing and certification of graduates. Including four subcomponents:

Component 2.1. Establishment of the FSM Skills Academy.

The objective of this subcomponent is to support the government in establishing FSA, which will serve as the national flagship TVET institution that offers high quality, one-year TVET instruction to students who have completed grade 11 and are interested in obtaining a TVET high-school diploma, as well as short-term vocational skills training to youth and adults (not enrolled in school) interested in upgrading their skills. FSA will be a fully residential campus for grade 12 students, with a planned enrollment of around 80 students. It is expected that FSA will train approximately 240 such students from across the country during the project period. In addition, it is expected that FSA will provide short-term training to local youth and adults who will commute to the campus to participate in the training. To support the establishment of FSA, the project will finance three sets of activities: rehabilitating the physical infrastructure of the erstwhile PATS,⁴ strengthening trainer capacity to deliver high quality, long-term TVET as well as short term skills training, and improving planning and management. Furthermore, it will also finance the cost of room and board for all students living on-campus.

The institution's operational costs, excluding salaries of faculty and staff, will be fully financed by the project for the entire project period. On the other hand, faculty and staff salaries will be fully covered by the project only during the first year of the institution's establishment. In the remaining years, the federal government budget will cover progressively increasing shares of these costs, with 100% of the salary expenses paid by the government in the last year of project implementation. To ensure the long term sustainability of FSA, the government will also prepare and approve, by the end of the fourth year of the project period, a costed, multi-year institutional development plan for government takeover of all aspects of the academy following project closing. FSA will be overseen by a Board chaired by the Secretary of NDOE and its day-to-day operations will be managed by the Pohnpei Roman Catholic Church (PRCC).

To support infrastructure rehabilitation, the project will finance the costs of relevant civil works and necessary laboratory equipment and supplies for delivering high quality training in a small set of targeted trades and skills areas. The rehabilitation works will be based on a feasibility and needs assessment of physical infrastructure rehabilitation undertaken during the project preparation phase using financing from the PPA facility.⁵ These works will be managed by the Department of Transportation, Communications & Infrastructure (DoTC&I) of the Government of FSM, which will be responsible for procuring the necessary services and equipment, monitoring work progress, ensuring quality control, and regularly reporting to the PIU and the Board on implementation progress.

To strengthen teacher capacity in FSA, all the teachers will be required to participate in and complete the ToT program financed by the project within the first two years of their tenure. In addition, they will be encouraged to get their skills assessed and certified, and

⁴ Established in 1965, PATS was the premiere vocational high school in FMS that offered programs in agriculture, building construction and mechanics to students from across the country as well as other Pacific countries.⁴ While the school ceased operations a number of years ago, there has been continuing strong interest among both policymakers and the general public in building on its existing extensive grounds and basic infrastructure to establish a revitalized, high quality school that will serve as the flagship TVET institution in FSM.

⁵ It is expected that these civil works will cover the rehabilitation of, *inter alia*, administrative buildings, classrooms and academic buildings, laboratories (or "shops"), residential and dining facilities, warehouses, and roads/pavements within or around the campus compound. The rehabilitation works will be designed to maximize climate resilience, minimize energy wastage, and ensure that the facilities are accessible to differently abled students.

also participate in online digital skills development programs that may be offered through the project. The project will cover the costs of skills assessment and participation in such skills development programs. To strengthen the planning and management capacity of FSMSA, the project will finance: (i) cost of short trainings for key administrators in project planning and management,⁶ (ii) technical assistance for designing and implementing a multi-year institutional development plan and an annual capacity development plans for trainers and administrators for the project period; (iii) technical assistance for preparing, by the end of the fourth year of the project period, a costed, multi-year institutional development plan for post-project closing period; (iv) support for establishing and operating an employer outreach and career counseling program (including linkages to employment support activities financed under component 3); (v) support for organizing independent skills tests for training graduates and interested teachers; and (vi) technical assistance for designing and implementing annual tracer studies of graduates.

- Component 2.2. Upgrading TVET training curricula.
- Component 2.3. Designing and implementing high quality training of TVET master trainers and trainers.
- Component 2.4. Making provisions for independent assessment and certification of skills.

Component 3: Improving labor market information and employment services in FSM.

This component aims to establish capacity within the government to provide labor market information and employment support services with a view to improve labor market outcomes among potential workers – including TVET graduates – in FSM. To this end, the activity will support FSMSA, other TVET institutions and relevant government units, including federal and state personnel offices and state departments of education, in their efforts to match jobseekers with appropriate vacancies through comprehensive job search assistance. Activities will be established with a primary focus on domestic jobs, but they will also facilitate jobseekers' access to labor migration opportunities. The component will further finance a comprehensive labor market assessment. It is expected that NDOE will implement this component in close partnership with DoTC&I Resources and Development (R&D).

To this end, the component will include the following two activities;

- Component 3.1. Implementation of a comprehensive labor market assessment in FSM.
- Component 3.2. Supporting job search assistance in FSM.

Component 4: Project Management.

The objective of this component is to support project management, including monitoring and evaluation (M&E) of project activities. It will finance the establishment costs and incremental operating expenses of the Project Implementation Unit (PIU). Headed by a project director, the PIU will be an integral part of NDOE and will be staffed by dedicated staff, including, *inter alia*, a program officer, an education specialist with experience in TVET, a labor market specialist, an M&E specialist, and an accountant, recruited from the market or assigned from government staff on the basis of well-defined Terms of Reference (TOR). To strengthen the government's capacity for effective project preparation and swift implementation kickoff after effectiveness, the program officer will be hired through the project preparation advance (PPA) facility available to World Bank financed projects in FSM. The project director will be a regular staff member of NDOE. While the implementation of many of the activities under the project will be led by established units within NDOE (namely, FNFED), the PIU will be responsible for overall

⁶ This training will also be made available to key administrators of other TVET institutions.

project management and coordination, including financial management, procurement, environmental and social safeguards, and M&E. It will also organize and manage/coordinate training activities under the project. The PIU will be closely supported by the Central Implementation Unit (CIU)—a unit within DoFA established to provide project implementation support to all World Bank financed operations, especially in the areas of fiduciary management and safeguards --in carrying out its fiduciary and safeguards responsibilities.

Project M&E will be carried out under the leadership of the Quality and Effectiveness Division (QED) with close support from the PIU which will be responsible for the coordination of M&E tasks and consolidation of monitoring information. The M&E activities will include designing the project's M&E system and data collection tools; organizing and implementing the field supervision of project activities; providing technical support and feedback to field staff; collecting or managing the collection of timely, sufficient, and accurate information on project inputs, outputs and outcomes; analyzing collected data and disseminating the findings; conducting formative evaluations of ongoing project activities and using the findings to inform course corrections; and conducting relevant studies. The PIU will also be responsible for leading and coordinating the project's interactions with the World Bank and organizing WB-government joint project review missions, and preparing relevant progress reports both for internal consumption and for sharing with the World Bank.

2.3. FSM Skills Academy (formerly PATS) Revitalization – Project Description

The former PATS is no longer operational as a national TVET facility. Many of the buildings are unused, but some of the facilities are leased to educational tenants and private tenants (as described below).

To support infrastructure rehabilitation, the SEEP Project, under Component 2.1, will finance the costs of relevant design and civil works and necessary laboratory equipment and supplies for delivering high quality training in a small set of targeted trades/skills areas. The rehabilitation works will be based on a feasibility and needs assessment of physical infrastructure and training industry needs during project implementation. It is expected that these civil works will cover the rehabilitation of, inter alia, administrative buildings, classrooms and academic buildings, laboratories (or “shops”), residential and dining facilities, warehouses, water and sewage and roads/pavements within or around the campus compound. The rehabilitation works will be designed to maximize climate resilience, minimize energy wastage, and ensure that the facilities are accessible to differently abled students

The final ESMP will have detail on the following:

- Purpose, nature and scale of the renovation and construction of buildings, including layout plans and sketches.
- Design details relating to materials used, energy efficiency, water supply and efficiency use of wastewater treatment and disposal, universal design, fire and life safety, and other supporting infrastructure.
- Construction details – duration of construction period, construction methods, likely workforce, source of key materials such as aggregates and management and disposal of waste material, including hazardous.
- Occupation and land use details – what will the facilities be used for, number and scale of students and staff, hours of day, days of week, weeks of the year when the facility will be operational, any specific emissions to air, land or water from the operation of the facility.

2.3.1. Risk Rating

Following preliminary assessment; Component 2.1 (former PATS renovations) is deemed to have a Moderate Environmental and Social Risk Rating. This rating was assessed based on the Project not being large or complex; not involving activities with high potential to harm people or the environment; and is not likely to significantly adversely impacts sensitive environmental areas. All construction impacts associated with Component 2.1 (design, construction and operational) are temporary, predictable and readily mitigated with well proven controls.

Environmental risks associated with Component 2.1 include building waste (hazardous and non-hazardous), pollutants such as stormwater and sediment discharges, health and safety risks from construction, and the management of water use, energy use and waste during building operations. Risks also may occur from the use of raw materials, including sourcing aggregates and creation of waste from vocational training facilities.

Potential social risks include inequitable access to project benefits and construction-related social risks, particularly relating to labor management, worker and stakeholder feedback and grievances and potential for sexual exploitation and Abuse (SEA) and sexual harassment (SH) by project workers. All other social risks will be managed through the projects SEP, LMP and actions in the ESCP.

Borrower experience, track record, and ability for effective undertake stakeholder engagement was assessed as part of project appraisal; adequate capacity building and trainings as well as staff resources have been committed by the NDOE and reflected within the Projects Environmental and Social Commitment Plan (ESCP).

The risk ratings identified in the Concept-stage Environmental and Social Review Summary have been validated based on the mitigation measures set out in this preliminary ESMP which has given particular consideration to (ii) management of construction waste and sourcing sustainable building materials; and (ii) integrating the mitigation of social harm and maximizing benefits into project design.

Preliminary safeguard screening of the former PATS site has been undertaken (Annex 1) and provides a general understanding of the key risk associated with environmental and social aspects of project. These risk are discussed and addressed within this preliminary ESMP based on the information currently available. Updated screening of the project will be undertaken once designs are available. If hazardous wastes are identified additional screening tools and additional management plans will be developed to ensure the removal, storage and disposal meet FSM national and international standards.

3. Project Location and Baseline

3.1.1. National Context

FSM is located near the equator about 4,000 kilometers (km) southwest of the Hawaiian Islands in the Western Pacific Ocean and within the Caroline Islands group. The largest nation in the Micronesian sub-region, FSM is made up of four semi-autonomous states (Kosrae, Pohnpei, Chuuk and Yap) located between Marshall Islands to the east, Palau and the Philippines to the west and Guam north (refer Figure 1).

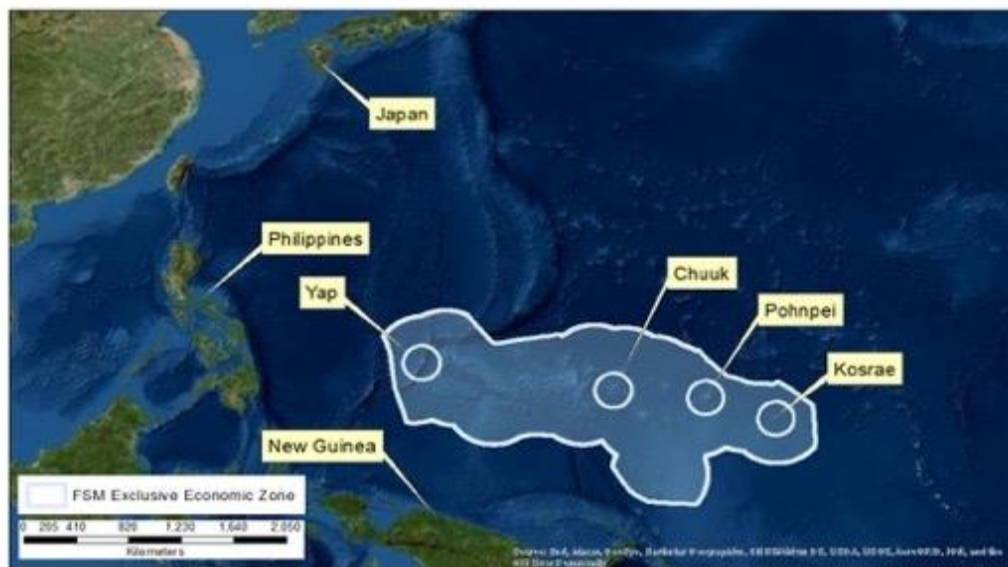


Figure 1: Location of the FSM State: Kosrae, Pohnpei, Chuuk and Yap.

FSM is made up of 607 islands scattered over an area of about 2.6 million km², including its Exclusive Economic Zone (EEZ), in the western Pacific Ocean. The total land area of FSM is 704.6 km², with 7,192 km² of lagoon area. The islands vary from small islets, which are inundated at high tide, to atolls and large volcanic islands with land area of more than 80 km². Approximately 65 (approx. 10%) of the islands are inhabited.

3.1.2. FSA (formerly known as PATS)

3.1.2.1. Physical, Social and Socio-Economic Environment

The former Pohnpei (Ponape) Agriculture and Technical Trade School (PATS) is located on the Island of Pohnpei, which houses the FSM national government. PATS was established in 1965 and closed in 2004. It was the premiere vocational high school within the FSM that offered programs in agriculture, building construction and mechanics to students from the FSM as well as neighboring Pacific island nations. The school was originally for boys however girls were permitted in the early 1990s. The school was operated by the Catholic church of Pohnpei through the Jesuit order and international volunteers (e.g. US PEACE CORP, Australian).

The former PATS is located in a coastal rural area in the southeastern corner of Pohnpei Island within the municipality of Madolenihm (Figure 2).



Figure 2: Location of the former PATS on the Island of Pohnpei.

The land parcel covers approximately 36 hectares (ha) (Figure 3) and include coastal foreshore and land of which, a portion of the land has been highly altered and changed to reflect the requirements of the school.



Figure 3: Estimated land boundary of the former PATS.

The land parcel is owned by the Catholic church of Pohnpei and is divided into an upper and lower campus which are managed by separate entities within the Catholic dioceses of Pohnpei (Figure 4).

The “upper campus” is owned by the Catholic Vicariate of Micronesia and is overseen and managed by the Roman Catholic Community of Pohnpei. The facilities within the upper campus include; the main administration building (2 story), study halls for 4 grades, library, 2 dormitory buildings, student kitchen, student kitchen warehouse, construction tool room, concrete lab building, student chapel, plumbing/electrical shop, shower house, "benjo", wood working shop, construction trades (division) warehouse, nursery buildings, mechanic shop buildings, backup generator house, farm land, piggery and chicken house, 6 staff housing, open field and existing land that has not as yet been used.

On the lower campus, the Tamworohi Parish owns and manages the property – which includes all land seaside (north) of the main road that dissects the land parcel. The facilities within the lower campus include; the parish church, 3 housing units (single, two-bedroom units), the staff cafeteria, Marine and Environmental Research Institute of Pohnpei (MERIP), and staff quarters (one room for single staff), Basketball court, and the parish “Nahs” (community hut).

A preliminary desk top review of the site identified a historic Catholic chapel, but further on site survey work is required to identify additional cultural heritage sites and buildings.

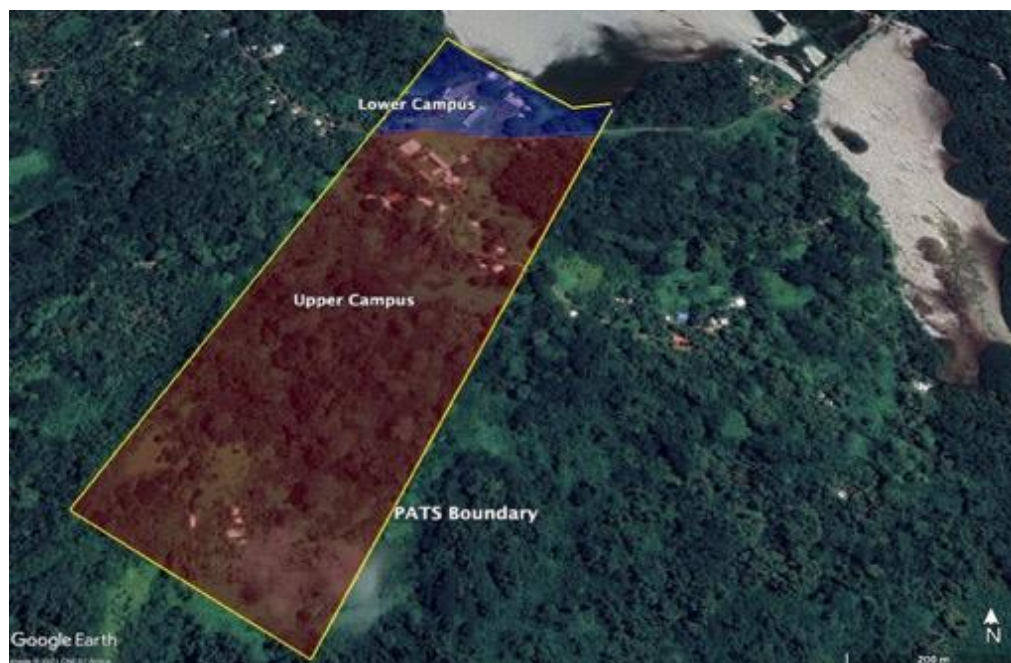


Figure 4: Estimated Upper and Lower Campus of the former PATS.

The former PATS land parcel has been partially cleared for land use by the school. A considerable portion of the land parcel remains undeveloped, consisting of a range of vegetation including local subsistence crops and trees. The site, due to its reduced use since 2004, has witnessed considerable revegetation of the land parcel and degradation of infrastructure and services (Figure 5).



Figure 5. Examples of vegetation cover and building status in 2018 of the former PATS.

3.1.2.2. Ecological Environment

Nine (9) terrestrial Areas of Biodiversity Significance (ABS) have been designated for the island of Pohnpei. The largest is the Pohnpei Watershed Forest Reserve covering an area of 5100 ha throughout the upland forest of the island. The former PATS (FSA) land parcel is below and well outside of the reserve's boundaries.

Due to the high annual rainfall of Pohnpei, a number of permanent and intermittent freshwater streams and rivers collect rainfall from within the water catchment area of FSA and discharge directly into the inshore marine environment. The north western land boundary of the former PATS follows the stream, whilst during periods of high rainfall, surface water causes localized flooding in low areas before discharged into the inshore lagoonal waters.

The former PATS land parcel terminates at the high-water mark on the adjacent foreshore. The adjacent marine and inner lagoon areas possess extensive mangrove forest, sea grass bed and coral reef systems further offshore. The intertidal marine areas adjacent to and in close locations to the former PATS site have been altered and includes past dredging operations, causeways and foreshore buildings (e.g. houses, small docks) and have been used for subsistence and small scale commercial resource extraction and aquaculture, respectively.

Fifteen (15) marine Areas of Biodiversity Significance (ABS) have been identified on Pohnpei Island, some of which have been designated whilst others are under development. The marine inshore waters surrounding the former PATS coastal foreshore are included in the "Lepinsed Madolenihm Marine Area of Biodiversity". This marine area of biodiversity has been identified for

its mangrove forests and associated inshore ecosystems. The mangrove forest are not located within or directly adjacent to the former PATS land boundaries and are well outside the FSA perceived area of influence.

In addition, twelve (12) Marine Protected Area (MPA) have been designated on Pohnpei island, four of which are located in the southeastern corner of Pohnpei Island (Figure 6) within the Lepinsed Madolenihm Marine Area of Biodiversity. They include; Nanwap Marine Sanctuary (305 ha), Namwen Na Stingray Sanctuary (71 ha), Nahn Nigh Stingray Sanctuary (34 ha) and Senpehn Mangrove Reserve (130 ha). These designated MPA areas are all located well outside of the former PATS coastal foreshore boundaries and as such no impacts to these MPA sites are expected from any works undertaken within the PATS land boundaries.



Figure 6. Designated Marine Protected Areas in close proximity to the former PATS foreshore.

Nan Madol, a significant archaeological site on the eastern shore of Pohnpei has been declared a United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage Site (refer Figure 6). It is the ruin of a megalithic civilization composed of 92 small to large artificial islets built on a coastal inshore reef flat (Figure 7). The islets are scattered over an area larger than 105 ha and are separated by narrow channels and enclosed by an outer seawall. Archaeological studies have suggested construction of the islets began around 500 AD and the Saudeur Dynasty of Chiefs expanded on its initial construction until about 1200 AD.

Nan Madol lies due west of the former PATS (approximately 2.8 km in a straight line) and is located on a separate island, is accessed by a low causeway across an intertidal reef flat that is connected to the main road that passes through PATS. Nan Madol is located well outside of FSMSA coastal foreshore and terrestrial boundaries and as such no impacts are expected to this site for any works undertaken within the FSA land area.

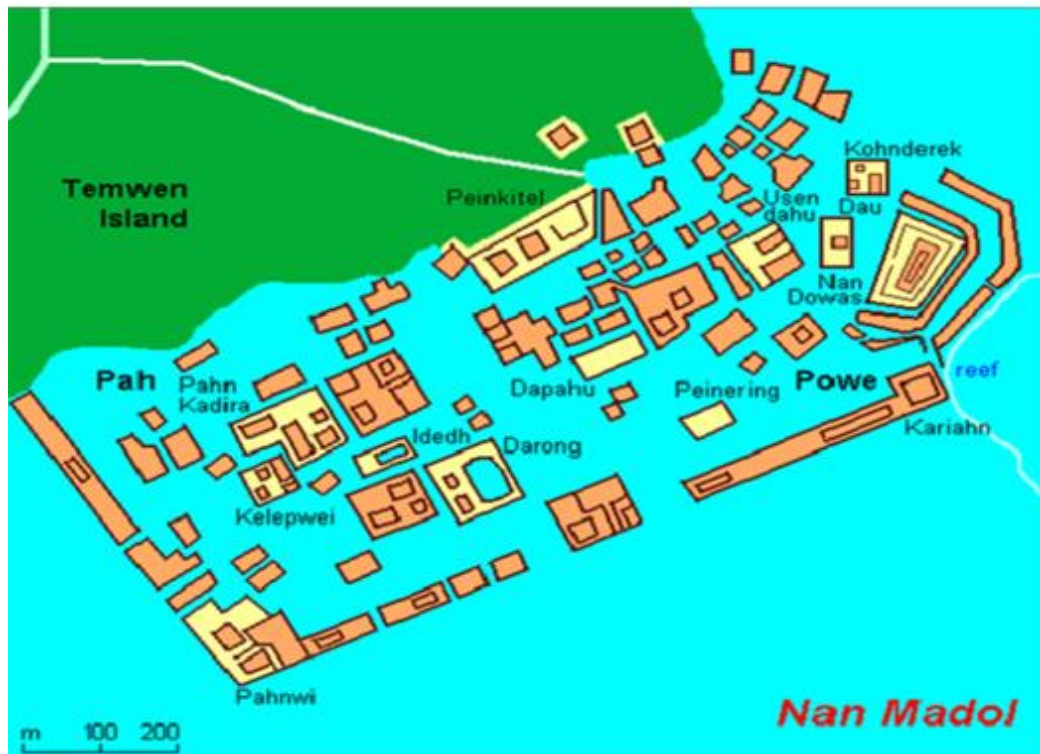


Figure 7. Design of the Nam Madol ruins.

The baseline section in the Final ESMP will include the following relevant information:

- Detail/s on the current status/condition and current uses of the buildings/campus and the occupiers within the former PATS.
- More detail on the source and nature of potable water and treatment and disposal of wastewater and stormwater.
- Waste water and sewage past facilities, treatment and management systems.
- Description of the neighborhood and neighboring properties.
- Cultural heritage items of interest including the historical Catholic Church within the former PATS grounds.

4. POLICY, LEGAL AND REGULATORY FRAMEWORK

4.1. Introduction

This section describes the following:

- Country specific policy, legal and administrative frameworks relevant to Component 2.1 of the FSA project (the renovation of the former PATS);
- World Bank environmental and social standards (ESS) relevant to Component 2.1 of the FSA project (the renovation of the former PATS);
- World Bank Group Environmental, Health and Safety Guidelines (EHS Guidelines) relevant to Component 2.1 of the FSA project (the renovation of the former PATS); and
- Other relevant international and regional conventions.

4.2. Country specific policy, legal and administrative frameworks relevant to the project

4.2.1. National Government Legislation, Regulations and Policy Requirements

The GoFSM is modelled after the federal system similar to that of the United States of America (USA) with a national president and four state governors with respective legislatures and judiciaries. The states of Pohnpei, Chuuk and Yap have four levels of governance – National, State, municipal, and traditional. Kosrae does not have the fourth level of government, as it no longer has traditional leadership.

The four States of FSM (Kosrae, Pohnpei, Chuuk and Yap) have considerable degrees of autonomy. Each State also has its own set of environmental and social laws and regulations geared to protect the States from a wide range of environmental impacts including, the effects of climate change. Under the Compact II, Article VI and section 161 of Title II, FSM is committed to applying the National Environmental Policy Act 1969 (since repealed) and “*to develop and implement standards and procedures to protect its environment*”.

The following list of articles of legislation are relevant to the FSA component of the SEEP project.

NATIONAL LEGAL FRAMEWORK	
FSM Constitution	The supreme law and it established the national, state and municipal governance.
FSM Environmental Protection Act 2014	Provides for the protection of the environment, culture, historic and natural aspects of Micronesian heritage.
FSM EPA Environmental Impact Assessment Regulations 1989.	Requires the National Government and its agencies to submit Environmental Impact Statement (EIS) to the Secretary of Human Resources prior to any “major” action significantly affecting the quality of the human environment.
Marine & Freshwater Quality Standards Regulations 1986.	Identifies the uses for which waters of the FSM shall be maintained and protected (water quality).
Trust Territory Solid Waste Regulations 1979	Establishes the minimum standards for the design, construction, installation, operation and maintenance of solid waste storage, collection and disposal systems.
FSM Earthmoving Regulations 1988	Earthmoving activity permits are issued by the Secretary of Resource and Development.

Labor Code (title 51).	Outlines hiring or non-resident workers, labor development and other requirements, including Occupational Health and Safety. The Public Employment Code 2014 requires that workers exposed to hazardous working conditions are additionally compensated.
FSMC Title 26 Historical Sites and Antiquities.	Policy to protect and preserve the diverse cultural heritage of the people of Micronesia.
Trust Territory Air Pollution Control Standards and Regulations (1980).	Sets out air quality standards by preventing/controlling the emissions of air contaminants at their source. These regulations incorporates USEPA National Emission Standards for Hazardous Air Pollutants.
Toilet Facilities & Sewerage Disposal Regulations (1977).	Establishes minimum standards for toilet facilities & sewerage disposal to reduce environmental pollution, health hazards, & public nuisance from such facilities.
FSM Constitution Title 23 Resource Conservation.	Establishes standards for Marine Species Preservation (Chapter 1) Resource Conservation (Chapter 2). The Act is administered by Department of Resources and Development (DRD). Note the national government does not have the jurisdiction inside the 12 nautical miles of any land/reef, which is the responsibility of the individual States.
FSM Land Use Act	Provides law concerning ownership, use, inheritance and transfer of land.

4.2.2. Pohnpei State Government Legislation, Regulations and Policy Requirements

The four States of FSM each have their respective state level regulations and legal frameworks elaborating on the National Constitution and EIA Regulation stipulating their specific requirements.

The following list of laws and policies that exist in Pohnpei for managing and conserving the environment that may apply to the FSA component 2.4 of the SEEP project.

POHNPEI STATE LEGAL FRAMEWORK	
Pohnpei Constitution (1984).	Is the Primary rule of law in the state of Pohnpei. Establishes the conservation of natural resources and the protection of the environment and outlines ownership, acquisition and use of land and ensures Pohnpei state customs and traditions are upheld, respects and protect.
Pohnpei Environmental Protection Act (1992).	Establishes the procedure for the preparation of an Environmental Assessment States (EAS) prior to any action that may significantly affect the quality of the human environmental. The degree of assessment is dependent on level of environmental impacts and is determined by the Environmental Protection Agency (EPA). The EPA receives the environmental assessment – reviews for compliance with the act and authorizes commencement through a permit process with specific conditions. Permits and licenses may include: <ul style="list-style-type: none"> • EPA Earthmoving Permit; • Land Ownership Documentation;

	<ul style="list-style-type: none"> • Forest Clearance; • Marine Resource Assessment Report; • Municipal Government Clearance (planning approval); • Department of Lands Approval; and • Historic Preservation Clearance.
Public Trust Lands Distribution Act 1980.	
Public Lands Act 1987.	
Deed of Trust Act 1987.	
Trust Territory Environmental Protection Act, preserved from the Trust Territory Environmental law (The Act) and subordinate regulations relate to;	
<ul style="list-style-type: none"> • Air Pollution; • Pesticides; • Public water supply systems; • Marine and Freshwater quality • Solid waste; • Toilet facilities and sewerage disposal; and • Earthmoving. 	
Transportation Zone Act 1987.	
Conservation and Resource Enforcement Act, 1982	
Forest Management Act, 1979.	
Pohnpei watershed Forest Reserve and Mangrove Protection Act, 1987.	
Designation of State Bird Act.	
Marine Resource Conservation Act 1981.	
Pohnpei Cultural Preservation Act.	
Trust Territory Environmental Quality Act	

The Final project ESMP will contain a final list of relevant Federal and Pohnpei State policies, laws and regulations.

4.2.3. Relevant International Conventions

FSM is a signatory to a number of international conventions and treaties. Those potentially relevant to the FSA component of the SEEP project are listed below:

- International Plant Protection Convention 1951.
- World Heritage Convention 1972.
- United Nations Convention on the Law of the Sea 1982.
- Vienna Convention for the Protection of the Ozone Layer 1985.
- Convention for the Protection of the Natural Resources of the South Pacific Region 1986; and companion protocols 1986.
- Convention on Biological Diversity (CBD) 1993.
- United Nations Framework Convention on Climate Change (UNFCCC) Paris Agreement 2016.

- Basel Convention for Hazardous wastes and disposal.
- Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) 2003.
- Convention on the Rights of the Child (CRC), 1993
- Convention on the Rights of Persons with Disabilities (CRPD), 2016.

The Final project ESMP will contain a confirmed list of relevant international conventions.

4.3. Applicable World Bank Environmental and Social Standards

4.3.1. Environmental and Social Standards

The relevant WB ESS are as follows:

Required Project Environmental and Social Standard Actions	
Environmental and Social Standards	Impacts and Required Measures and Actions
ESS1 Assessment and Management of Environmental and Social Risks and Impacts	<p>ESS1 is relevant. The preliminary risk rating is moderate; risks are considered easily identifiable and standard mitigation measures are readily identifiable and apply. Once projects scope of works has been developed, full understanding of environmental and social risk can be identified/quantified including hazardous and non-hazardous construction and demolition waste generated and management.</p> <p>The preliminary ESMP provides initial screening guidance with respect to environmental and social assessment under ESS1 in Annex 1.</p> <p>A final project ESMP will ensure full understanding of risk are identified and suitable mitigation and management measures are developed. CIU safeguard team will support the management of environment, social, health and safety, SEA-SH risks and impacts of the project including mobilization of environmental and social risk management specialists if necessary.</p>
ESS2 Labor and Working Conditions	<p>ESS2 is relevant. The Project Implementation Unit (PIU) will engage design consultants as direct workers or contracted workers and will also engage contractors to renovate the former PATS infrastructure for the FSA. The construction workforce may be Micronesian or foreign, depending on the size of the contracts and nature of the building projects.</p> <p>An LMP has been prepared including a Project Worker or Labor Grievance Mechanism (refer to the LMP) which includes provisions to ensure suitable working conditions for all workers, receive and manage workers grievances, prevent GBV/SEA/SH, and/or violence against children in the workplace, and the Occupational, Health and Safety (OSH) requirements for all project workers, including to be adopted and applied under the project.</p>
ESS3 Resource Efficiency and Pollution Prevention and Management	<p>The Standard is relevant for the renovation of FSA. The nature and scale of demolition and construction waste will not be known until project implementation, but it is likely to contain medium/large volumes of hazardous and non-hazardous solid waste. Demolition material may include asbestos, treated timber and/or lead-based paints. Typical emissions from renovations/rehabilitations includes noise, dust, sediment and stormwater runoff. There are few residents nearby the former PATS and the nuisance impacts are expected to be low. Sediment and stormwater runoff may affect</p>

Required Project Environmental and Social Standard Actions	
Environmental and Social Standards	Impacts and Required Measures and Actions
	<p>neighboring riparian and coastal foreshore and inshore marine habitat and water quality if untreated.</p> <p>Aggregate sourcing for building materials is likely to come from local, land-based quarries on Pohnpei. Other materials, such as timber and steel, are likely to be imported. The source of materials will be screened during project preparation.</p> <p>Management of all hazardous and non-hazardous wastes will also be considered at the design phase of building renovation and appropriate mitigation will be included in the Contractor's bid documents and the contractor's ESMP. This preliminary ESMP sets out mitigation measures for aggregates, water, wastewater and waste management. These will be updated in the FSA final ESMP.</p>
ESS4 Community Health and Safety	<p>ESS4 is relevant to the FSA renovation. The risks to community health and safety from construction activities are considered to be minor and manageable. Works will be contained within the former PATS grounds and the public, staff and students can be excluded by fencing and by timing of works to avoid term time.</p> <p>The Contractors may bring in workers from off-island and while the numbers are not expected to be significant they may reside and work in close proximity to school children, depending on the timing of works.</p> <p>The PIU will designate a Project Officer to prepare, adopt, and implement a stand-alone Sexual Exploitation and Abuse and Sexual Harassment and Gender-Based Violence Action Plan (SEA-SH GBV Action Plan) which will cover direct and indirect risks introduced from Project workers and/or downstream educational activities promoted at the FSA as part of the project.</p> <p>Design-related aspects such as universal access, fire and life safety etc, will be required as part of the design TOR and reviewed as part of final design review.</p>
ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	<p>ESS5 will be relevant for the project as physical infrastructure improvements proposed for the FSA may have the potential to physically and/or economically displace occupants (non-title holders) who are residing in the existing structures.</p> <p>A screening for this risk will occur during Project Preparation, specifically when FSA scope of works have been determined. This will inform land requirements for the facility, the extent of works required and the potential to accommodate project-affected people, if required. Screening will occur through reviewing lease agreements (verbal or written) and undertaking engagement and surveys with Project-affected people. The assessment of potential for economic and physical displacement will be considered in potential modification of the planned FSA design to avoid displacement.</p> <p>The former PATS is located on land owned by the Roman Catholic Community of Pohnpei. The PATS original lease and ongoing leasing agreement for the FSA will be verified once feasibility designs for the FSA infrastructure improvements are available. An ESS5 screening and assessment will also be conducted, including a household survey and inventory of losses, to determine whether the project will result in the</p>

Required Project Environmental and Social Standard Actions	
Environmental and Social Standards	Impacts and Required Measures and Actions
	<p>displacement of occupiers (lease-holders or non-titled) and any persons who could potentially experience economic or physical displacement.</p> <p>A preliminary and verbal agreement was made between the PATS land lease holder and the NDOE to assign the land lease and physical assets (structures and facilities) to the NDOE for purposes of the FSA. The details of this legal arrangement will be finalized before detailed designs are completed for the FSA. No land acquisition is anticipated as part of the project, nor involuntary resettlement. This means that occupants at the PATS – once identified – will be invited and not involuntarily displaced. If occupants decide to stay, design features will be applied to avoid disruptions to occupants.</p> <p>The leasing agreement will be verified during project preparation (as part of screening), including whether there are any occupants (formal or informal) who may be affected by renovation developments. If there are any issues with the lease, the ESCP will require a land access process to be prepared before completion of the FSA design.</p> <p>The land access process will outline the steps NDOE will take to ensure the lease is current and relevant, in accordance with ESS5, prior to works starting. If there are any people affected by the renovations (such as lease holders or informal occupiers or non-title holders) the ESCP will require the preparation of a Resettlement Action Plan to document affected people’s eligibility and entitlements under a negotiated settlement arrangement.</p> <p>No other land (e.g. government, private) is required for the project.</p>
ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	<p>ESS6 is currently considered not relevant for the former PATS renovation as the site is not within or adjacent to a protected area or area of known biodiversity and will not affect living natural resources.</p> <p>Buildings or renovations will be within the former PATS campus and desk-based site screening identifies that the land area used by the buildings has been previously highlight modified (land clearing) and a such natural ecosystems and habitats are screened as not present. If emissions such as sediment and treated wastewater, could enter the adjacent streams and discharge into the marine environment during construction or operation; and potentially affect food gathering or benthic/costal habitat if left unmitigated, the impacts will be managed under ESS1.</p> <p>During Final ESMP preparation the project area of influence will be surveyed for natural habitats, including further assessment will be carried out on the Areas of Biodiversity Significance nearby, to confirm whether they are likely to be within the Project Area of Influence.</p> <p>This preliminary ESMP includes appropriate, proportional avoidance and mitigation measures for biodiversity conservation and ecosystem services.</p>
ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	<p>ESS7 is not considered relevant. The majority of people in FSM are Micronesian, around 90%, consisting of various ethnolinguistic groups, and will be the overwhelming beneficiaries of the project.</p> <p>The preparation of all E&S management instruments and project consultations will be tailored to the cultural and linguistical preferences of the</p>

Required Project Environmental and Social Standard Actions	
Environmental and Social Standards	Impacts and Required Measures and Actions
	local people. Attention to vulnerable groups is addressed through ESS1 and ESS10, as well as the SEP.
ESS8 Cultural Heritage	ESS8 is relevant to the project. A preliminary desk-top review of the site identified a historic Catholic chapel and there may be other historical or cultural artefacts or sites requiring protection. During the preparation of the final ESMP, the former PATS site will be surveyed for cultural heritage sites and/or artifacts and land owners and community members interviewed. This preliminary ESMP has included relevant procedures to avoid or mitigate impacts on cultural heritage and the requirement for a chance find procedure during construction.
ESS9 Financial Intermediaries	This standard is not relevant to the project, as no financial intermediaries will be involved in the operations.
ESS10 Stakeholder Engagement and Information Disclosure	Key stakeholders are FSM youth and their families – from around the country, the education sector – including individual school institutions, civil service more broadly and the private and public sector employers in FSM. An SEP and Project Grievance Mechanism (GM) have been prepared as set out in this ESMP. The GM will be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the project, consistent with ESS10.

4.3.2. World Bank Group Environmental, Health and Safety Guidelines

The World Bank Group's EHS Guidelines represent good international practice for managing environmental, social, and community/occupational health and safety risks in project design and implementation. EHS Guidelines also outline performance levels and measures for facility development, construction and decommissioning and use of latest technologies at reasonable cost.

4.3.2.1. General EHS Guidelines

1.0 Environmental: The General Environmental EHS Guideline provides methods and approaches for the management of wastewater, noise and dust during construction, water conservation and solid waste management.

2.0 Occupational Health and Safety: The fundamental premise for OHS under the EHS Guidelines is that "Employers and supervisors are obliged to implement all reasonable precautions to protect the health and safety of workers" and that "Companies should hire contractors that have the technical capability to manage the occupational health and safety issues of their employee".

The EHS Guidelines also require that prevention and control measures to minimize occupational hazards should be based on comprehensive job safety analyses (JSA). Annex 2 contains a Health and Safety Management Plan Guideline which incorporates a basic JSA methodology. The principles are:

- Eliminating the hazard by removing the activity from the work process. Examples include substitution with less hazardous chemicals, using different manufacturing processes, etc.;

- Controlling the hazard at its source through use of engineering controls. Examples include local exhaust ventilation, isolation rooms, machine guarding, acoustic insulating, etc.;
- Minimizing the hazard through design of safe work systems and administrative or institutional control measures. Examples include job rotation, training safe work procedures, lock-out and tag-out, workplace monitoring, limiting exposure or work duration, etc.; and
- Providing appropriate personal protective equipment (PPE) in conjunction with training, use, and maintenance of the PPE.

3.0 Community Health and Safety: This guideline provides approaches and methods for drinking water quality, life and fire safety for building design and structural design of buildings. Some guidance may be useful for new building construction and renovation, relating to traffic safety (transport of materials) and communicable disease control from imported labor.

4.0 Construction and Decommissioning: The Construction and Decommissioning EHS Guideline provides guidance for specific community and occupational health and safety and environmental issues relating to new buildings or building renovation.

4.3.2.2. Environmental, Health and Safety Guidelines for Water and Sanitation

This guideline provides guidance for new and upgraded water supply and sanitation at various scales and is relevant for school building upgrades and new school buildings.

4.3.2.3. Environmental, Health and Safety Guidelines for Construction Material Extraction

This guideline provided guidance on the safe management of construction material extraction during operational, construction and decommissioning of projects and is relevant for school building upgrades and new school buildings.

5. ENVIRONMENTAL AND SOCIAL MANAGEMENT ROLES AND RESPONSIBILITIES

5.1. SEEP Project PIU

The Project Implementation Unit (PIU) in the NDOE is responsible for the projects overall management, coordination and compliance with the WB ESF on behalf of the GoFSM. This includes ensuring the Final FSA ESMP is completed in time to influence the final design and bid documents and ensure the ESMP is complied with throughout the construction period. The PIU will be supported by the CIU Safeguard Team (see below) for strategic and technical support, monitoring and reporting of environmental and social risk management.

Headed by a Project Director, the PIU will be an integral part of NDOE and will be staffed by dedicated staff, including, inter alia, a program officer, an education specialist with experience in TVET, a labor market specialist, an M&E specialist, and an accountant. The PIU will designate a Project Officer to prepare, adopt, and implement a stand-alone Sexual Exploitation and Abuse and Sexual Harassment and Gender-Based Violence Action Plan (SEA-SH GBV Action Plan).

The PIU Project Director will also be responsible for the following including specific requirements associated with the FSMSA renovation with support from the CIU Safeguards Team as required:

- Allocate budget and include the environmental and social risk management tasks in the FSA project plan;
- Approve the final Terms of Reference (TOR) for the Final FSA ESMP, before submitting to the World Bank for review and clearance;
- Approve the content of the Final ESMP, based on technical review and recommendations by CIU Safeguards Team before sharing with the WB for review and clearance;
- Coordinate, facilitate, and where appropriate participate, in face-to-face land owner, land occupier and stakeholder meetings and conduct other consultations as per the projects SEP;
- Ensure inclusion of environmental and social risk management clauses into the design consultant TOR, supervision consultant TOR and the Contractor's bid documents;
- Approve the CESMP and send to the World Bank for review and clearance prior to works starting;
- Monitor the CESMP implementation;
- Prepare monthly, quarterly, and yearly monitoring report/s as detailed in the projects' ESCP.

The Project Officer is to provide assistance and support to the PIU Project Director on the above.

In addition, the PIU will have a second Assigned Project Officer whom will have responsibilities for undertaking assessment/s, management and monitoring of the Projects activities relating to Gender Based Violence (GBV) and Sexual Exploitation, Abuse and Sexual Harassment (SEA-SH).

5.2. Project Steering Committee

A high-level Project Steering Committee (PSC), chaired by the Secretary of Education, will be established to guide and oversee overall project implementation and ensure that the project activities are consistent with government policies. The PSC will also be responsible for approving the annual project budget and activity plan, reviewing project implementation progress, and advising the PIU on any course or scope adjustments needed during implementation. It is expected that the members of the PSC will include the Secretary of NDOFA, State Directors of Education, the Project Director of the PIU, representatives from the division of labor (under the Department of Justice) and FSM Association of Chambers of Commerce, as well as a representative of COM-FSM. The project governance structure may also include a set of thematic

working groups to address technical and operational questions not currently covered by existing activities or operational procedures within NDOE. The working groups will comprise of representatives from Workforce Development and Trade Skills programs under the State Departments of Education, National and State Personnel Offices, technical experts from NDOE, employer representatives for selected trades, and representatives of TVET institutions.

The PSC as a role with grievance redress (as explained below)..

5.3. The CIU

The already established CIU within the DoFA, (the SEEP Executive Agency) is a functional unit that supports the implementation of the WB portfolio including the SEEP project which includes an environmental and social safeguards team.

In order to provide strong and efficient support throughout FSM, the CIU provides support to core implementation functions needed for all WB portfolio projects in FSM including, but not limited to, procurement, financial management, social and environmental safeguards, monitoring and evaluation, as well as outreach and communications. The CIU team members responsible for these functions report to the CIU Program Manager and will provide services and hands on support to the NDOE for project implementation and capacity building activities. Project implementation responsibilities however, remain with the NDOE.

5.4. CIU Safeguard Team

The CIU Safeguards Team currently and will continue to undertake a range of stakeholder engagement activities as part of its portfolio of WB funded Projects and has existing relationships with a many of stakeholders in each State which will be important to utilize for the overall SEEP project and the FSA subcomponent.

In relation to implementation of the FSA ESMP and the SEEP SEP, LMP and RF in relation to the renovation works, the PIU will require support from the CIU Safeguards Team for capacity building and E&S technical support throughout the Project and to ensure the safeguard instruments are implemented appropriately and is consistent with the requirements of the WB ESS.

The CIU Safeguards Team will be responsible for:

- Preparing the TOR for the FSA Final ESMP;
- Preparing the Final FSA ESMP and / or support the engagement and management of consultants to prepare the Final FSA ESMP, and review of draft and final outputs as required;
- Review and comment on the design and supervision consultant TOR to ensure the ESMP and ESS requirements are included;
- Review and comment on outputs from the design and supervision consultants to ensure compliance with the ESMP and ESS;
- Ensure environmental and social clauses and relevant E&S instruments are included in Contractor bid document, including environmental and social protection and mitigation measures are included;
- Provide technical review and clearance recommendations of the CESMP to the PIU;
- Oversee the implementation of specific mitigation measures outlined in the FSA ESMP and CESMP;
- Assist with the management of project grievances (GM) and EHS incidents as required, providing technical support to resolving issues and incidents;
- Assist with the storage of data (including grievance records), collating and interpreting stakeholder feedback and providing details to the PIU, NDOE, design team and others as necessary;
- Provide E&S reporting as part of WB reporting;

- Assist to obtain all relevant FSA project permits from Pohnpei EPA and federal agencies as required;
- Contributing environmental and social risk management tasks and costs into the budget and work plan for Component 2.1; and
- Provide ad hoc technical and capacity building support to the PIU on the implementation of the ESMP and supervision of the CESMP.

The CIU Safeguards Team may need additional social and environmental risk management support to implement the growing WB portfolio in FSM including the SEEP project. Specialist consultants may be required on an *ad hoc* basis by the CIU to prepare the updated ESMP and/or to conduct specialist supervision or monitoring services. Estimated resourcing requirements and corresponding budget for the PATS project safeguard requirements are recommended in sections 12 and 13, respectively.

5.5. Civil Works Contractors

The Contractor engaged to undertake the FSA project renovation works will be responsible for undertaking stakeholder engagement and prepare and implement a Contractors Environmental and Social Management Plan (CESMP) based on the project final ESMP. The Contractor is responsible for implementing any environmental and social protection and mitigation measures as outlined in the bid documents. Specifically the works Contractor is required to:

- Have Occupational Health and Safety (OHS), environmental and social specialist on their team with relevant experience;
- Support the PIU in engaging with stakeholders relating to communicating the scope and timing of works (either by attendance at meetings, installation of notice boards, door knocks/letter drops, etc.);
- Negotiation with landowners/users in relation to temporary use of land required for construction relation activities (e.g. laydown and storage/stockpile areas, worker amenities, etc.) and assessment of temporarily used land after reinstatement/restoration to a condition acceptable to the land owner;
- Receiving complaints and grievances by stakeholders and forwarding to the PIU during works project implementation, construction, and resolution of grievances if they are related to the Contractor (in coordination with the Projects Manager and CIU);
- Implement OSH, environmental, social, community health and safety and security measures under their CESMP;
- Respond to corrective action requests by the supervision consultant, PIU or CIU; and
- Regularly report OSH, EHS, progress, incidents, issues, grievances to the PIU.

6. POTENTIAL/ANTICIPATED ENVIRONMENT IMPACTS, RISKS AND MITIGATION MEASURES

The scope of works to be undertaken at the former PATS site is unknown and as such this section describes the potential and/or anticipated physical impacts of the projects on the environment and human activities associated with renovation works and potential mitigation measures that can be implemented to reduce or remove potential impacts. Thus this preliminary ESMP is to provide an understanding of the potential impacts which need to be considered and incorporated into the early planning and design of the FSA renovation project. Once the scope of works is known, the preliminary ESMP will need to be updated (final ESMP) to reflect the actual scope of works and at this time will supersede the preliminary ESMP.

It is however noted that the below information is derived from existing sources, local knowledge of the site and discussions as no field investigations were able to be undertaken. However, the CIU Safeguard team have previously visited the project sites (and the conclusions are considered valid in this context). The majority of potential impacts are associated with the construction phase of the project, noting that no large demolition works are expected. A works activity associated with this project could include design/technical assistance, site preparation, construction, reinstatement, operation and maintenance.

Key areas of potential risk and potential mitigation actions are discussed separately for Pre-Construction, Construction and Operating periods in the following sections. These key potential/anticipated impacts are further developed in the project Environmental and Social Impact Mitigation and Monitoring Table (Annex 2).

6.1. Pre-Construction Period

The concept design and procurement of works can play a major role to avoid or reduce significant impacts to the former PATS site and neighboring communities and the environment. Thus, the FSA project design should reflect current international standards for design and construction of buildings, energy sources, utilities and sustainable water usage, air quality, wastewater and sewage management, the use of nontoxic building materials which may include building/site renovations, rehabilitation, preparation, and other building infrastructure assets. In addition, the following key impacts need to be considered during the pre-construction phase to ensure these standards are met. They include;

- **Climate Change Impacts** –Buildings and associated facilities (e.g. water, sewage, power) typically have design lives of 20 to 40 year timeframes over which climate change could have direct and indirect impacts. Key impacts anticipated for the FSA project are due to effects of the environment namely increased frequency and intensity of rainfall/storms and coastal inundation/erosion related to sea level rise. An understanding of the likely impacts of future climate change by building engineers/designers and asset managers can result in both future climate change efficiency of the renovations and potential long term cost savings.
- **Safety in Design / Building Safety Assessments** – design not robust enough for local conditions (e.g. rainfall) or not international best practice, does not take into account locally available material, or not appropriate for local safety issues.
- **Identification of Hazardous Materials** – design does not identify potential existing hazardous material (e.g. asbestos, lead based paint, waste oil from past school activities etc) and provide international process to safely remove and dispose from site and design does not include conditions to limit use of hazardous materials.
- **Avoiding and/or managing sensitive receptors (cultural heritage, natural or critical habitats)** – Due to the nations cultural richness, historic customary and church general practice may lead to contact with both known and unknown physical and cultural resources and as such chance finds are possible. As such sensitive receptors not being adequately

screened, leading to these sensitivities not been fully understood or identified during design phase, resulting in inappropriate design, or unnecessary impacts.

- **Identifying opportunities for environmental improvements** – opportunities exist for environmental and social environment through sound and thoughtful design.
- **Lack or insufficient public consultation and project information disclosure** – leading to community, including the Catholic church not aware of nature, scope, impacts or timing of works, and not being able to adequately engage.

6.2. Construction Period

The majority of potential impacts anticipated for the FSA project are associated with the construction phase of the project, with the expectation that renovations and refurbishment of existing buildings and associated infrastructure will be undertaken. It is anticipated that no large demolition works are expected.

Potential impacts arising from building renovation works within the FSA project will depend on a number of factors including the existing site conditions of all building and associated infrastructure, the location of nearby assets and sensitive environmental and social receptors including potential historic/cultural building/sites and the scale and nature of the works proposed. On this basis potential construction impacts are summarized below. In many instances potential impacts can be mitigated through the implementation of Good International Industry Practice (GIIP) measures which need to be included in the FSA design through the project final ESMP.

6.2.1.1. Water Quality and Sediment

There is potential for the discharge of sediment and contaminants as a result of the FSA project construction activities. An increase in suspended sediments in receiving water bodies (streams, rivers and estuarine/coastal marine areas) can be caused by earthworks and vegetation clearance activities as well as uncontrolled discharges of fine material from exposed soil and stockpiles through stormwater runoff and overland flow. This can lead to changes in the water quality of adjacent watercourses and coastal environments. There is also the potential for hydrocarbons from machinery operations and refueling activities impacting water quality.

In the case of the FSA project due to the very high levels of tropical rainfall and potential of tropical storm systems potential water quality impacts could arise due to the generation of fine material in stormwater runoff and the vicinity of terrestrial ecosystem and ecologically sensitive water bodies (freshwater and/or marine). Impacts are not expected and if they occurred are fully manageable through the use of practical standard building construction environmental mitigation practices, such as stormwater control, sediment traps, stockpile management, controlling hazardous substances and minimizing instream and coastal works.

6.2.1.2. Terrestrial Biodiversity and Habitats

In the case of the FSA project, potential terrestrial biodiversity and habitat impacts are expected to be limited in size to the existing footprint of the existing buildings and associated infrastructure, small in scale and the fact that terrestrial ecosystem within these areas of former PATS site have been highly modified, greatly reducing natural ecosystem functions. The generation of fine sediments resulting from stormwater discharge from the construction site/s is the main issue expected to impact the terrestrial ecosystem habitat and resources. Impacts are fully manageable through the use of practical standard building construction environmental mitigation practices, such as stormwater control, sediment traps, stockpile management, controlling hazardous substances and minimizing instream and coastal works.

6.2.1.3. Freshwater and Coastal Marine Biodiversity and Habitat

The potential impacts of construction activity relate primarily to the; i) Direct loss or damage of existing freshwater, estuarine and coastal marine habitat adjacent to the expected building renovation footprint/s; ii) Direct water quality impacts associated with uncontrolled runoff of sediments from exposed earth or stockpiles in stormwater from construction areas, or from spills or leaks from hazardous substances (e.g. petrochemical from machinery or storage areas); and iii) Impacts on freshwater and marine ecosystem, habitat and/or fauna and flora as a result of changes in water quality.

In the case of the FSA project, potential freshwater (riparian), estuarine and marine biodiversity and habitat impacts are expected to be limited, small scale if at all as it is expected these natural systems are not close to the projects building renovation footprint. This will be determined once final scope of works are known. In addition, these natural systems have been modified which has reduce natural ecosystem function. During the preparation of the final ESMP the emissions of stormwater run off and waste water will be assessed to ensure that there is no impact on the Lepinsed Madolenihm Marine Area of Biodiversity, which includes four specific marine protected areas. This is very unlikely as they are all well outside the project area, however a precautionary process will be taken to scope and then avoid impacts to these environs during the construction period of the project and during operation. All perceived impacts are fully manageable through the use of practical standard building construction environmental mitigation practices, such as stormwater control, sediment traps, stockpile management, controlling hazardous substances.

6.2.1.4. Air Quality

Fugitive emissions of particulate material can occur from all construction activities. Emissions during construction period for FSA are likely to minimal however could consist of; i) Exhaust emissions from machinery (e.g. excavators, trucks, generators etc) which will depend on age and condition of machinery; and ii) Dust associated with the building renovations (e.g. removal, renovations) earthworks, road use – transport operations, material storage/ stockpile, concrete removal/cutting/batching, quarrying or crushing materials.

Adverse effects of these emissions depend primarily upon the sensitivity of the local environment and proximity to local populations. Those located closer to the construction activities are most likely to be most affected, whilst those located further away are likely be least affected. These effects can be classified generally as nuisance effects as a result of deposition of particulates onto places where people live or frequent, or onto crops.

Impacts of particulate matter depend on the size of the particles generated. Human health effects of airborne Particulate Matter (PM) are mainly associated with fine particles that are less than 10 microns in size (PM₁₀) and which are small enough to enter the upper respiratory tract. Coarser particulate matter, greater than about 10 to 20 microns, generally cause nuisance effects due to soiling of surfaces, visibility or irritation to eyes and nose. The large fraction (greater than 20 µm) is usually referred to as deposited particulate matter.

In the case of the FSA project, potential air quality impacts are expected to be minor, site specific not wide spread and all relate to dust generation from construction activities, from soil, gravel and equipment stockpiles and from the movement of construction vehicles. All perceived impacts are fully manageable through the use of practical standard building construction environmental mitigation practices, such as stockpile management, covering transportation vehicles, servicing vehicles.

6.2.1.5. Noise and Vibration

Construction activities can result in increases in ambient and peak noise levels. Increases in noise associated with construction are typically short term and are not considered to be significant given the adoption standard mitigation measures (i.e., mufflers on vehicles, specific work times etc.).

Intense vibration can damage buildings, retaining walls and other structures as well as cause nuisance and potential health effects on people.

The main potential sources of noise and vibration anticipated for the FSA project are likely to be; i) Removal – renovation of any buildings / road track surface / soil / overburden / vegetation by bulldozer; ii) Equipment and material deliveries/placement to site (e.g. aggregates and building material); and iii) equipment use (e.g. transport vehicles, cranes, backup generators).

Residential dwellings within the former PATS site and neighboring communities in close proximity to works will be particularly sensitive to elevated noise and vibration. Construction related traffic or activities could affect noise levels and potentially result in noise effects on nearby sensitive receptors located along the road entering the former PATS site (e.g. such as local residents, schools).

Drilling may be required for the removal of old building material (e.g. concrete) and/or installation of new buildings foundations and structural components which could have low to moderate vibration effects.

For the FSA project, potential noise and vibration impacts are expected to be minor, site specific, short lived and all relate to standard machinery usage expected from construction activities. All perceived impacts are fully manageable through the use of practical standard building construction environmental mitigation practices, including monitoring and adherence to GIIP and EHS guidelines. Managing the timing of works and site activities is the most appropriate management option for all the noise and vibration producing activities.

6.2.1.6. Hazardous Substances

The use and storage of hazardous substances (such as hydrocarbon – fuel oil, pesticides, lead in paint, asbestos etc) can impact soil and water resources, if they accidentally spill or leak into the environment or if they are not properly disposed of, or in the event of a fire in the case of flammable substances. Storage of hazardous substances will need to be managed (i.e., EHS Guidelines and adopted for fuel stored in bunded fenced areas, refueling activities remote from watercourses on hard stand areas, fire-related precautions adopted, fenced and secured etc.).

For the FSA project, the use of hazardous substances is perceived to be minor and restricted to on site limited petrochemical storage and use (on site machinery) during the construction period.

It is unknown if the existing building/s include asbestos and/or lead based paint and as such once the projects scope of works is defined the project will follow the WBG Good practice Note: Asbestos Occupational and Community Health Issues and undertake a hazardous material assessment (including asbestos, lead based paint). If the assessment identifies that the existing buildings have Asbestos Containing Material (ACM) an Asbestos Management Plan (AMP) needs to be developed. It needs to clearly identifies the location where the ACM are present, its condition (e.g. whether it is in friable form or has the potential to release fibers) procedures for monitoring its condition, procedures to access the locations where ACM is presented to avoid damage, and training of staff who can potentially come into contact with the material to avoid damage and prevent exposure. The plan should be made available to all persons involved in operations and maintenance activities. Repair or removal and disposal of existing ACM in buildings should be performed only by specially trained personnel following FSM country requirements incorporating internationally recognized procedures.

AMP results and mitigation requirements are to be included in the update final ESMP. All perceived impacts are fully manageable through the use of practical standard GIIP mitigation measures such as suitable secured storage, inspection, handling and contingency practices and trained staff the risk of hazardous substances being discharged to the environment is considered to be low.

6.2.1.7. Waste Management

Solid waste will be generated as a result of the construction process particularly as a result of removal and renovation of existing buildings and associated infrastructure. Quantities and type of waste material generated by the FSA project are currently unknown.

While existing building material where possible should be reused on site, some may require removal and disposal. Any solid waste generated during the FSA project will be managed according to the following hierarchy of treatment; i) Recycled / reused where possible; ii) Remaining waste taken off-

site and disposed at a facility licenced (permitted) by Pohnpei State EPA including separation of waste to meet the state waste management system; iii) Any hazardous waste generated as a result of the project will be managed based on EHS Guidelines in conjunction with FSM national and State laws and regulations.

Provisions need to be arranged to ensure construction workers will have access to sanitation facilities and the management of these facilities allow for gender separation and all liquid wastes will require treatment to a standard that is consistent with treatment of similar waste within Pohnpei State.

The Contractor will be required to prepare a Waste Minimization and Management Plan (WMMP) and Spill Management Plan (SMP) which sets out strategies and actions required to reduce potential health and environmental risks associated with project waste generation and disposal, including hazardous materials, management to avoid spills and other environmental releases, and identify opportunities for material recycling or reuse. This preparation of the WMMP and SMP will be determined once the FSMSA scope of works has been developed and updated in the project Final ESMP.

An assessment of all permitted waste management facilities on Pohnpei is to be undertaken to ensure these facilities are suitable for the waste material generated from the FSA project. Similarly, once the FSA scope works has been developed, additional information pertaining to the design and use of toilet facilities, sewage disposal systems within the former PATS site will need to be assessed and results presented in the Final ESMP. Inclusion of state regulations and codes of conduct should be considered for inclusion.

6.2.1.8. Invasive Pest Species

Imported vehicles and building material associated with construction activities can be vectors for weeds and animal pests. There is, albeit low, the potential to introduce terrestrial invasive species through vehicles and transport of building construction materials, soil, aggregate particularly if this material is imported from overseas or inter-State. Implementation of GIIP mitigation measures (vehicle washing, sourcing weed free aggregates, fumigating aggregates etc) will ensure all GoFSM biosecurity measures are implemented minimizing the risk of invasive pest introductions.

6.2.1.9. Aggregate Suppliers

It is unknown if and what quantity of locally sourced aggregate may be required for the renovation of the FSA, however it is anticipated that cement will be required and as such locally sourced building grade aggregate will also be required. It is not expected that asphalt will be required, however if during the design of the project scope of work identifies the use of asphalt the updated final project ESMP will be required to ensure suitable management practices are incorporated.

Construction works will require aggregate to be used and a supply cement. Wet cement which has the potential to be a source of pollution to soils, ground and surface waters.

No coastal or marine reef derived coral rock or sand will be permitted to be used on the project due to risks to climate resilience and ecological impacts.

Pohnpei State has existing and disused land-based quarry sites, which have been previously used for road maintenance and construction activities. These sites will require further investigation to determine whether they can supply suitable material (both quality and quantity) to meet the needs of the project once known. If these quarry sites are not able to meet the Projects requirements, aggregate material will need to be sourced from offshore (inter-State or international).

Aggregate material imported from offshore will need to meet Pohnpei State and ESS requirements, which includes impacts managed through the implementation of Codes of Practice (CoP) for quarry and dredging operations and ensuring materials such as aggregate and equipment meet strict biosecurity precautions and clearance for imported materials, as well as adherence to the World Bank Group EHS Guidelines for construction material extraction.

With GIIP mitigation measures in place, any potential impacts of locally or international sourced material can be managed to mitigate potential impacts.

6.2.1.10. Greenhouse Gas Emissions

Greenhouse Gas Emissions (GGE) during construction will be generated by construction machinery. This impact will be temporary and is not expected to be a significant contributor to overall emissions, so long as vehicles and equipment are adequately maintained. Vessels bringing equipment and resources from overseas will generate emissions but are considered to be minor in terms of overall contribution to GGE.

Since any change or increase in GGE are likely to be minimal, no assessment has been completed and no mitigation is proposed.

6.3. Operational Period

The potential operational phase impacts of the FSA project include both positive and negative outcomes. Overwhelming are the positive outcomes of a new school providing international standard of buildings and associated infrastructure suitable of deliver accredited Technical and Vocational Educational Training (TVET) to young Micronesians. The FSA scope of work will likely result in the direct benefits to all users, include boys and girls, vulnerable and disable students from all sectors of the FSM island and communities and in the medium to longer term positive benefits to socio economic improvements through skills development and job security.

The operational period will include ongoing discharges to the environment and ongoing waste management from operations, including the facilities teaching laboratories, mechanical workshops, cafeteria and water and sewage. In addition, increased facility occupancy and use of the site will mean emissions and waste will be greater than the baseline (at least since the institution was closed in 2014). However, adverse impacts on land and water quality will be below because wastewater will be treated and discharged in accordance with GIIP and solid waste management (including recycling) will be set up as part of institutional revitalization. Standard waste management mitigation measures as outlined in the project ESMP need to be maintained throughout the life of the facility to ensure acceptable long term environmental and social outcomes.

It is the operational period where the benefits of climate resilience, energy and water use efficiency, universal access and quality building materials and construction will be enjoyed by beneficiaries.

7. POTENTIAL/ANTICIPATED SOCIAL IMPACTS, RISKS, MITIGATION AND OPPORTUNITIES

The scope of works to be undertaken at the former PATS is unknown and as such this section describes key potential and/or anticipated social impacts of the projects on the existing community of the former PATS and neighboring human activities associated with renovation works. Thus this preliminary ESMP is to provide an understanding of the potential social impacts which need to be considered and incorporated into the early planning and design of the former PATS renovation project. Once the scope of works are known, the preliminary ESMP will need to be update (final ESMP) to reflect the actual scope of works and at this time will supersede the preliminary ESMP.

It is however noted that the below information is derived from existing sources, local knowledge of the site and discussions as no field investigations were able to be undertaken. However, the CIU Safeguard team have previously visited the project sites. The majority of potential social impacts are associated with the construction phase of the project, and the implementation of mitigation measures to ensure community is informed and aware of the project. It is unknown if FSA project will recommence any teaching prior or during the renovation construction period, as such mitigation measures have been included if students are or are not present.

Key areas of potential social risk are discussed in the following sections. These key potential impacts are further developed in the project's Environmental and Social Impact Mitigation and Monitoring table (Annex 2).

7.1. Land Access in the Pre-Construction Period

The former PATS land parcel is owned by the Catholic Church of Pohnpei and will be leased to the national government (NDOE) to operate as a TVET school for the nation. The lease agreement has not been finalized, however it is understood verbal discussions/agreements have been entered into for this purpose between the Catholic Church of Pohnpei and NDOE. This lease arrangement will be finalized before the FSMSA renovation component of the SEEP project is initiated and has been included as an action in the project's ESCP. The land availability within the former PATS school grounds is considered adequate for all construction activities and therefore the project will not involve any involuntary land acquisition or use, and new lease arrangements for construction activities are not anticipated.

The following social impacts need to be considered during the pre-construction phase:

- **Land Access, Use and Ownership/Agreements** – there may be issues defining or securing the land ownership documents within the former PATS site. This could include:
 - Formal land ownership agreement documents do not exist;
 - Formal land ownership documents are believed to exist, but cannot be sourced/found;
 - Formal land Ownership documents exist and can be sourced but are not well defined (i.e., either no map accompanying the agreement or the map is not detailed enough to define the exact extent of the boundaries); or
 - There are existing (i.e. historic) disputes over the area of land or easement.

Not having formal, well defined, land ownership agreements in place for the FSA project could potentially lead to Project risks such as landowner disputes and grievances, which if unmitigated or unresolved could delay and/or prevent the implementation of scope of works.

- **Asset Damage** – through poorly or inadequate designed water management (e.g. roofs catchment systems, storm water management) resulting in runoff eroding infrastructure and/or land parcel or damaging adjacent assets.
- **Direct Land and/or Asset Loss** – as a result of the need to relocate structures (e.g. buildings, driveway access etc.) and/or vegetation (e.g. trees, root crops) and the resultant impact on subsistence and livelihoods to accommodate the FSA Project.

- **Disruption to Access** – such as during building renovation activities or the replacement of infrastructure which could pose significant inconvenience to occupants of the former PATS and/or all FSA users.

7.2. Physical and Economic Displacement at the Former PATS

The Catholic Church of Pohnpei have indicated that an estimated **7 families** currently occupy the former PATS site. Permission was granted by the Church to these occupants approximately 10 years ago. Consultation with the Church also indicates that occupants may plant seasonal crops on land within the former PATS site; namely food gardens.

Physical displacement: No involuntary physical displacement of these people is expected to occur for the FSA project. As per the ESS5 mitigation hierarchy, the project design will seek to avoid physical displacement of occupants/families. Once the scope of works has been defined, assessment of impacts is required and results and subsequent mitigation measures are to be included in the projects final ESMP.

Economic displacement: the project could result in direct temporary or permanent asset loss as a result of the need to renovate or relocate structures (buildings) and/or remove productive trees and crops with resultant impacts on livelihoods. Loss of crops could occur if occupants of the former PATS have planted food gardens on land envisaged to form part of the FSA project (designs to be initiated). Crop losses are anticipated to be minor but would nonetheless require adequate notice to occupants and potentially compensation and assistances where seasonal crops cannot be harvested ahead of construction.

Should any physical or economic displacement be proposed for the project, a Resettlement Action Plan is required to ensure mitigation of potential impacts are addressed. Occupant families will be engaged and supported about their plans for the future and not involuntarily displaced. If occupants decide to stay, design features will be applied to avoid disruptions to occupants.

7.3. Proposed/Anticipated Civil Works

To mitigate safety and other social risks associated with the FSA projects civil works, the project should implement a checklist system within monitoring and reporting processes that specify design features to safeguard communities and prevent environmental issues. This includes ensuring that:

- Building renovation and/or new buildings (yet to be determined) designs include actions to address climate resilience and study practicality including; pollution prevention, resource efficiency (particularly water and aggregates), waste minimization, safe drinking water, fire safety, safety in design, accessibility, climate resilience co-benefits (such as engineering to allow for solar panels on roofs), cooling / temperature controls;
- All construction activities are restricted to the existing former PATS campus footprints;
- The PIU advises local communities via the projects SEP prior to commencement of construction so the former PATS and surrounding neighboring community members are aware of forthcoming works and associated risks;
- MOUs require NDOE to ensure contractors to implement all reasonable precautions to prevent accidents and injuries to existing and new FSA staff and workers and protect the health and safety of the community;
- The timing of construction works to coincides with school vacation times to minimize disruption and risk to students and staff from workforce activities. Currently (November 2021) the former PATS is not operational, however the above needs to be considered if this changes during the construction phase;
- Work on water, sanitation and hygiene (WASH) facilities is only completed during periods when the facility is not operating, and that during sanitation upgrades, separate, safe, hygiene and lockable sanitation facilities are provided by boys and girls/men and women;

- Contractors prepare and implement a Contractor's CESMP, including Worker Health and Safety Management Procedures in accordance with Annex 3 and, if necessary, a Traffic Management Plan;
- Building renovation design include adequate sanitation facilities for males and females, as well as appropriate WASH and menstruation, management and hygiene provisions;
- Suppliers, contractors and workers undergo reference checks during recruitment procedures;
- All contractor workers sign a Code of Conduct which explicitly prohibits any sexual contact and sexual harassment of children and students;
- All contractors and workers undergo a briefing on the Code of Conduct to ensure they clearly understand the provisions and consequences of breaching including disciplinary measures;
- Students, parents and community leaders are made aware of nature and duration of work including information on reporting incidents or concerns;
- Reporting and grievance mechanisms are in place in the event of harassment, abuse, violence, including clear investigation and accountability procedures;
- FSMSA staff and other project implementers are provided with contact information and referral procedures for victim support;
- The contractor or institute records who is present on the site on a daily basis;
- The visibility of construction areas is maintained. If visibility will be obscured, access to areas surrounding the works should be restricted;
- Contractors develop comprehensive safety plans, which are shared with and agreed by NDOE management. Prior to finalization of site safety plans, if classes have resumed students are provided opportunities for input, and
- Safety plans specify that tools are not left unattended; dangerous areas are well marked, fenced off and lit at night; traffic management mechanisms are appropriately included to avoid risks of road accidents; work areas are clearly marked and physical barriers set-up where possible.

Specifically for renovations to the former PATS dormitories, the designed is required to address student safety to reduce risk of harassment, bullying, abuse (including GBV/SEA/SH) and/or neglect. The renovation design need to incorporate consideration of the needs of both male and female students and include adequate provisions to ensure comfort and safety of both. Recommended mitigation measure to be included in the project design include:

- Conducting safety audits of existing dormitories facilities prior to facility design to identify physical and other factors that contribute to incidents of violence, and perceptions of safety. These audits should include: analysis of the overall layout, lighting, visibility, presence of locks on dormitory internal and external windows and doors, perimeter fencing, availability and appropriateness of sanitation facilities, design of showers, unsupervised areas, divisions in sleeping quarters between age groups and genders, alarm procedures etc;
- Ensuring the results of safety audits are incorporated in design and construction ToR and / or bid documents;
- Consulting with police, community and church leaders, teachers, parents and students about potential safety issues in schools and dormitories and what systems need to be in place;
- Conducting girl and women-only focus groups to ensure the voices and perspectives of female and male beneficiaries are fully considered in building design, including WASH options. Female focus groups will also enable discussion of gender sensitive WASH topics such as menstruation hygiene management and standards;
- Ensuring appropriate school and boarding facility SEAH reporting mechanisms are in place, aligned with NDOE and GoFSM child protection policies and procedures; and
- Ensuring teachers, trainers, tutors, mentors, supervisors and school/boarding facility management and key employees (including summer school programs personnel) have received appropriate training to understand and recognize abuse and are able to make safe and effective referrals.

7.4. Health and Safety

7.4.1. Workers Health and Safety

Construction activities can present significant health and safety risks to workers. These include potential risk to workers from heavy machinery, working at heights, working near water, exposure to heat/sun, overhead hazards (such as cranes, power lines), vehicles (working on an active construction site) etc.

To avoid these impacts, all Contractor/s will be required to work in accordance with relevant WBG EHS Guidelines, adhere to FSM National and Pohnpei State Health and Safety legislation, and be addressed by way of a project specific Occupational Health and Safety Plan (OHSP) to be prepared by the Contractor/s that outlines labor and working condition requirements for the FSA project. The contractor's OHSP is to ensure inclusion of the SEEP LMP OHS management procedures (Annex 3) related to project activities in terms of the roles of the CIU and the various categories of project workers (Direct workers, Direct workers (government) and Contract workers).

Contractor/s shall also adhere to the FSA project LMP and the National and Pohnpei State Labor Laws to prevent the exploitation of workers. In addition to workplace occupational safety regulations, this includes requirements to not use child labor; not discriminate workers in respect of gender, race, employment and occupation; to not use forced labor; and to allow freedom of association.

Unexploded Ordnance (UXO) are known to exist in Pohnpei as a result of military actions throughout the Pacific during World War II from 1942-1945. While many of the UXO's have been cleared there is a chance some may still remain undiscovered. The former PATS land and foreshore areas have been modified, cleared and built on in parts and as such the chance of workers encountering UXO's as part of this Project is very low.

However, mechanisms for identifying and reporting UXO's should be included as part of the Contractor's Health and Safety Plan (CH&SP) and included in future screening. A suggested Chance Find Procedure (CFP) (refer section 7.11) has been developed for the project. These documents should be included in the PATS final ESMP once the PATS scope of works have been finalized.

7.4.2. Community Health and Safety

Community health and safety can be impacted directly and indirectly during works construction activities through accidents, injury and spread of communicable disease. Public access must be restricted (managed) from entry to the work sites to ensure safety. Safe, well sign-posted, alternative routes for the community, pedestrians and vehicles must be provided at all times. Conversely, the Contractor must not restrict the rights of local communities to access their properties. Restricting the movements to traffic and temporarily changing road layouts can increase the potential for accidents.

Construction traffic will utilize existing roads as haulage routes. The increase in vehicle movements has the potential to place people using the area at risk particularly children. The risk may be higher in the rural communities in close proximity to the former PATS, where road traffic is minimal. This risk can be minimized by restricting construction vehicle speeds and timing the works to avoid the periods when pedestrians and vehicles are most frequently using the road. Other protective measures include signage and barriers, speed restrictions and public project awareness.

Gender-based violence (GBV) rates are high in FSM and women are vulnerable to trafficking, illegal sex work, unwanted pregnancies, harassment and violence. Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) is prevalent with approximately one in three women (32.8%) having experienced physical and/or sexual violence by an intimate partner in their lifetime within the FSM. There is also the risk of spread of communicable diseases from workers to the local community particularly if workers are working or residing in an area for extended periods. Project activities were screened using the World Bank SEA/SH Education tool. The project-related SEA/SH risk rating is moderate; SEA/SH Mitigation Measures commensurate with a moderate-risk category have been integrated into the Project Environmental and Social instruments and reflected in the Project ESCP and described below.

Imported and transient workforces such as those that are required for the construction industry are known to contribute to these issues. For women in FSM there are multiple barriers to having equal opportunities as well as a life free from violence and coercion. Priority areas of the GoFSM national gender planning include addressing female unemployment and a gender-stratified labor market, teenage pregnancy, violence against women and girls and limited access to justice and protection for women.

The FSA project aims at achieving gender mainstreaming in its design, management and implementation, to ensure barriers to participation of women are taken into account. The Contractor/s shall also prepare a GBV Action Plan, a part of the CESMP, to address GBV risk. Additionally, the project will be managed by the projects specific Grievance Mechanism (GM) which includes a GBV/SEA/SH reporting and referral pathway as well as standard project grievance pathway.

7.4.3. Construction-related occupational Health and Safety

Civil works required for renovation, extensions and new construction do pose potential occupational health and safety risks which must be effectively and protectively managed from the start of the project. All construction works will be undertaken by experienced contractors who will be required, by contract, to adopt and enforce OHS plans for project-related activities. Section 7 sets out suggested clauses for inclusion in construction contracts, including OHS requirements. It is emphasized that at all times all reasonable precautions to prevent potential accidents and injuries to staff and all workers, and to protect the occupational health and safety of the community. Annex 2 outlines the requirements for the project activities in terms of roles including contractor's Occupational Health and Safety Management Plan, which is also included in the projects LMP.

7.4.4. Pedestrian and Vehicular Traffic

During construction it is likely that there will be an increase in the number of vehicle (e.g., trucks) movements to and from the former PATS work sites bringing in fill, construction material, earthworks equipment and labor. This increased traffic could result in increased traffic congestion and an increased risk of traffic incidents and general road safety issues (such as road crossing by pedestrians) in neighboring communities.

However, it is considered that any increased construction traffic experienced will result in only minor impact on road users and minor and short term increases in congestion, noise and air quality effects on nearby sensitive receptors such as local resident's following implementation of GIIP mitigation measures. Traffic related impacts on air quality, noise and vibration are discussed in Section 5.2.1.4 and Section 5.2.1.5 respectively, above.

It is anticipated that the project contractors will be required to prepare a Traffic Management Plan (TMP) to ensure vehicle and pedestrian access to and from the former PATS work site is managed and maintained for all users. The TMP will need to be further developed once the FSA scope of works has been developed and subsequently implemented in areas where road congestion is perceived. The TMP will need to be developed and cleared before work commences.

7.4.5. Existing Essential Service Disruption

It is possible that disturbance or relocation of existing utility services (such as power, water, telecommunications etc) may be required for some works within the former PATS site.

Once the FSA scope of works have been determined, utility infrastructure within the proposed works footprint is to be surveyed as part of the Inventory of Loss (IOL). Consultations with the relevant Pohnpei State owners of the utility infrastructure identified within the footprint will be necessary to negotiate the most practical solution for avoidance or relocation of that infrastructure to ensure that works construction activities do not impact provision of this service to the community and the subsequent safe delivery of services to the project during and after construction renovations. Consideration of alternative sources of energy (e.g. solar, wind) for the renovations of the former PATS should be undertaken to ensure long term sustainable development of the site.

7.4.6. Construction Yard, Site Offices, Laydown Areas, Stockpiles etc

Construction yards, laydown areas and associated works facilities can cause an adverse impact through the increased disturbance, vegetation clearance, noise and waste generated by yards and work sites especially if the sites are located within or close to communities.

Given the former PATS site is in relatively close proximity to villages, communities and Kolonia town, it is anticipated that the Project will not require accommodation camps. Workers would likely be housed in existing facilities such as guest houses or rental properties. However, should construction camps be required the potential impacts can be mitigated by the implementation of GIIP such as providing suitable sanitation, water, catering, recreation and controlling/managing worker behavior. Potential temporary housing could be located within the former PATS site depending on the existing condition of existing dormitory, cooking and washing/sanitization facilities.

Imported labor may be required for the Project, if adequate resources and skills are not available locally. Importing labor can result in a range of impacts including environmental (e.g. increased pressure on existing natural resources), local economy and livelihoods (e.g. inflation pressures, exacerbate vulnerability of marginal groups), increased pressure on local infrastructure and health services (e.g. potential increases in violence, alcohol / drug consumption, diseases, etc), social and community wellbeing.

Contractors shall also adhere to the FSA Project Labor Management Procedure (LMP), as well as be required to prepare a Social Interaction Plan (SIP), as part of the Construction Environmental and Social Management Plan (CESMP), which is to include a Code of Conduct (CoC) for site workers induction, rules regarding alcohol use, interaction with the local community, establish requirement for stakeholder committee/community liaison officer, etc.

A construction yard, site office, laydown areas and/or stockpile area/s may be required during the FSA renovation depending on the final scope of the works of the project. Should this infrastructure be required, this will be negotiated between the Contractor and landowners. Mitigation measures will need to be developed in the final ESMP to ensure no residual impacts are anticipated.

7.5. Archaeology and Culture Heritage Resources

Ground disturbance activities such as those likely for building renovations and associated building works within the former PATS are to be undertaken, which can potentially physically damage or indirectly impact cultural or historic sites, particularly where earthworks or structures are being replaced.

The likelihood of any physical cultural resources being present that are not known within the former PATS grounds is considered low to very low given the works are predominantly located within or next to existing buildings and associated infrastructure.

Sites of archaeological or cultural significance (such as PATS chapel, grave sites, neighboring PATS heritage ruins Nan Madol) that may be adversely affected in any way by the works will be further identified during the development of the final ESMP. All renovation through design are to avoid cultural heritage sites, where avoidance is not possible site specific mitigation measures will be developed and included in the final ESMP. Contractors will implement the agreed mitigation measures throughout the construction phase.

To avoid any potential impacts to unknown sites of archaeological or cultural significance associated with the PATS project, a chance find protocol is to be developed and included in the final ESMP once the scope of works has been defined. The chance find procedure should identify actions to be undertaken in the event of uncovering cultural heritage artifact during the construction phase.

7.6. Vulnerable Groups

ESS1 states that “special consideration should be given to stakeholders that may be disadvantaged or vulnerable”.

While some vulnerable groups may live near or use sections of the former PATS land that will be potentially impacted by works construction activities, they are not specifically targeted or likely to be impacted over and above other landowners or groups and will not be excluded from any socio-economic benefit from the Project.

Particular attention will be paid to the needs of vulnerable Project Affected Person (PAPs) including socially and economically vulnerable groups during any stakeholder consultation activities and socio-economic surveys to be undertaken for works (if required). These may include those without legal title to the land or other assets, households headed by females (where appropriate⁷) the elderly or disabled and other vulnerable groups such as people living in extreme poverty or hardship⁸. The FSMSA project Stakeholder Engagement Plan (SEP) provides further detail on engagement with PAPs.

7.7. Stakeholder Engagement and Consultant Risks

Lack of meaningful, or insufficient consultation and project information disclosure can result in distrust or discontent from Project stakeholders.

It is important for the stakeholder engagement process to be inclusive, participatory and transparent to ensure multiple opportunities for learning about the FSA project for all affected or interested stakeholder groups. Ensuring informed participation and consultations creating an atmosphere for open dialogue, ensuring the vulnerable are empowered and facilitated to participate and transparency are the principles in the approach to stakeholder engagement.

Key stakeholder considerations, principles and engagement approaches for the FSA Project are outlined in the Project's SEP.

⁷ Note: On some islands in FSM all houses are headed by a female as they own the land. In these cases the female head of the household would not be considered a vulnerable group.

⁸ As determined and identified by the relevant community leader.

8. SUGGESTED CIVIL WORKS CONTRACTOR – ENVIRONMENTAL, SOCIAL, HEALTH AND SAFETY CLAUSES

The NDOE PIU will engage contractor/s to undertake the construction and renovation works associated with the FSA project. For all contractors' bid documents the following environmental, social, health and safety clauses should be considered for incorporation in bid documents for contracted works. Site-specific mitigation measures are to be inserted in the bid documents, along with the specific mitigation measures prescribed in this preliminary ESMP and subsequent final ESMP (once scope of work is known).

The CIU Safeguards Team will be responsible for the oversight of the environmental, social, health and safety activities of the contractor, and will review draft bid documents, review the Contractor's Environmental and Social Management Plan (CESMP) and will conduct periodic on-site visits to monitor and supervise progress. The CIU Safeguards Team will train and educate NDOE staff on basic environmental, social, health and safety activities and mitigation measures so that they can provide contractor oversight in-between CIU Safeguards Team site visits.

8.1. General – Preparation of Contractor's Environmental and Social Management Plan

The Contractor must prepare a Contractors Environmental and Social Management Plan (CESMP), to be cleared by the client prior to works starting (including CIU safeguard team review), which includes the following:

- Health and Safety Management Plan;
- Staff responsible for environmental management, consultation and community liaison, health and safety management, complaints management and reporting to the client;
- Risk register documenting the site-specific and project specific risks;
- Mitigation measures for all medium, high or very high risks, including detailed procedures, diagrams and other explanations about how they will be implemented and monitored;
- For any building where asbestos or other hazards have been identified by the client, and based on the Asbestos Management Plan the CESMP should include the relevant identification, management, storage and disposal practices;
- Waste Management Plan (WMP), which should include the types and volumes of waste expected, how waste will be reused or recycled within the local / island community, waste storage, transportation to Pohnpei (if required) or other international port, and export to a suitable disposal facility overseas, including procedures for export permits and other relevant approvals;
- Traffic Management Plan (TMP) where traffic-related risks to the surrounding community are identified as medium, high or very high. This should include what controls are required for truck drivers (training, qualifications, speed, times of day for transportation of equipment), what controls are required to warn motorists and pedestrians about transport-related risks (heavy loads, wide loads, slow vehicles);
- Training plan and training records relating to environmental controls, consultation and social impact management, health and safety; and
- Other matters as listed below.

8.2. Potential Hazardous Material

If, during the course of the projects construction/renovation, materials, structures or other infrastructure is discovered that have potential hazardous material (e.g. petrochemical storage-spillage, asbestos, lead based paints) the Contractor should immediately cease works and contact the CIU Safeguards Team for advice. If hazardous materials are identified a Hazardous Waste Management Plan will be required to be prepared by the contractor and approved by the project (PIU and CIU) prior to the commencement of construction works.

The Construction Contractor shall test painted surfaces for lead prior to demolition or renovation. If paint tests positive for lead, procedures will be developed to contain the materials and avoid environmental release. Disposal requirements will be outlined in the CESMP Waste Management Plan.

8.3. Community and Worker Health and Safety

- The Contractor/s shall at all times implement all reasonable precautions to prevent and reduce accidents and injuries to staff and workers and protect the health and safety of the community.
- The Contractor/s shall prepare and implement a Health and Safety Management Plan (HSMP) commensurate with the identified health and safety hazards at the FSA construction site and it shall include activities related to construction (such as the transportation and storage of materials).
- The Contractor/s shall at all times provide and maintain construction plant, equipment and systems of work that are safe and without risks to health. This shall include maintaining equipment, engines, and related electrical installations in good working order; maintaining a clean and tidy workspace; providing fences, guards and rails, signals and lighting; providing work site rules, safe working procedures and allocating appropriate places to carry out the work.
- The Contractor/s shall provide, at his/her own expense, the protective clothing and safety equipment to all staff and labor engaged on the Works to the satisfaction of the Employer's representative. Such clothing and equipment shall include, as a minimum:
 - High visibility vests for workers directing traffic;
 - Protective boots, gloves, sun and eye protection for the workforce; and
 - If the Contractor fails to provide such clothing and equipment, the Employer shall be entitled to provide the same and recover the costs from the Contractor.
- All the Contractor/s personnel shall, before commencing work, have an induction course on environmental management and safety and health at the site. The information and training shall be on the site and have duration of at least two hours.
- The Contractor/s shall prepare and implement a Traffic Management Plan (TMP) if required to ensure that any traffic and/or pedestrian hazards caused by the works are adequately managed. The inclusion of a TMP will be based on the final scope of works and equipment/material required to be transported to the PATS sites.

8.4. Waste Management

- The Contractor/s shall prepare a Waste Management Plan (WMP) as per the General Clause above.
- The Contractor/s shall, at all times, keep construction areas, including storage areas used, free from accumulations of waste materials or rubbish.
- Contractor/s ensures all construction waste is recycled or re-used as far as practicable within the former PATS site.
- All residual waste shall be stored and handled on site in accordance with the requirements of the Solid Waste Regulations 1989 and the World Bank Group EHS Guidelines to avoid littering and pollution to ground, coastlines or water.
- All waste that is not able to be reused or recycled locally shall be contained and exported to a suitable recycling or waste disposal facility, in compliance with international regulations. The details of waste export shall be contained within the Waste Management Plan, for clearance by the client prior to implementation. All documentation for export, including permits, receipts, tracking documentation will be shared with the client for verification.
- All wastewater and sewage from construction facilities shall be managed in accordance with the ESMP, national and local government requirements and World Bank Group EHS Guidelines, and the Contractor/s shall, as necessary, obtain a permit or other appropriate documentation approving the storage, treatment and disposal methods being used. The Contractor/s shall provide details in the CESMP.

8.5. Prevention of Water and Air Pollution

- The Contractor/s construction activities shall be performed employing methods that will prevent entry, or accidental spillage, of solid matter, contaminants, debris, and other pollutants and wastes into marine waters and underground water sources. Such pollutants and wastes include, but are not restricted to, refuse, garbage, cement, sanitary waste, and oil and other petroleum products.
- All waste construction materials shall not be stockpiled or deposited near or on waterbody perimeters or in a position where storm water runoff can entrain sediment and cause turbidity in neighboring waterbodies.
- Wastewaters from concrete preparation, or other construction operations, shall not be permitted to enter waterbodies without the use of control methods such as sediment filters.
- During the conduct of construction activities and operation of equipment, the Contractor/s shall utilize such practicable methods and devices as are reasonably available to control, prevent, and otherwise minimize atmospheric emissions or discharges of air contaminants.
- Equipment that shows excessive emissions of exhaust gases due to poor engine adjustments, exhaust system inoperative, or other inefficient operating conditions, shall not be operated until corrective repairs or adjustments are made.
- During the performance of the construction works the Contractor/s shall carry out proper and efficient measures wherever and as often as necessary to reduce the dust nuisance, and to prevent dust which has originated from its operations from damaging dwellings or causing a nuisance to persons.

8.6. Preservation of Vegetation

- All trees and other vegetation shall be preserved and shall be protected from damage by the Contractor/s construction operations and equipment.
- Movement of labor and equipment for access to the work shall be performed in a manner to prevent damage to vegetation or property.

8.7. Construction Facilities

- The Contractor/s workshops, office, and yard area shall be located and arranged in a manner to preserve trees and vegetation and minimize impacts to local communities.
- On completion of works, all temporary buildings, including any concrete footings and slabs, and all construction materials and debris shall be removed from the site.

8.8. Sourcing of Aggregates for Construction

- All aggregates used for project works will be sourced from local approved and permitted, land-based quarry sites, although aggregate sources outside of Pohnpei State and/or FSM may be required depending on the quantity and quality required. The final ESMP will provide further assessment and mitigation on the acquisition and use of aggregates for the project, including instructions for Contractors in the bid documents.

8.9. Worker Accommodation

- All workers shall be provided with safe and healthy accommodation, with potable drinking supply, running water, septic tank or reticulated wastewater collection and treatment, separate sleeping quarters (with separation of washrooms, bedrooms and toilets for men and women), and access to recreation areas / facilities. No new workers camps or worker accommodation facilities will be constructed (permanently or temporarily) for the workforce within the former PATS grounds.

8.10. Worker Code of Conduct

- All workers shall be required to sign and adhere to a code of conduct relating to worker behavior to avoid harm to community members. Training will be provided to outline appropriate behaviour and sanctions for noncompliance.

8.11. Cultural Heritage Chance Find Procedures

- When a person working on the project discovers a cultural heritage site or item, the following procedures should be followed:
 - Stop the activities in the area of the chance find.
 - Delineate the discovered site or area (e.g. fencing).
 - Secure the site to prevent any further disturbance, damage or loss. In cases of human remains, arrange for a guard to watch the site until the police, local government and / or National Cultural Commission representative or person with delegated authority take over.
 - Prohibit the collection of any object by any person.
 - Notify the Pohnpei State local government and Historic Preservation Office within 24 hours (and police if it is human remains).
 - Any objects that are found must be handed over to the Historic Preservation Office.
 - Project works can resume only after instruction is provided from the Historic Preservation Office.

9. STAKEHOLDER ENGAGEMENT

A site specific FSA Stakeholder Engagement Plan (SEP) will be developed as a stand-alone document and will be updated and referred to as required. This will add to the existing SEEP project Stakeholder Engagement Plan (SEP). This will be supported by the SEEP Grievance Mechanism (GM). A summary of the proposed content of the FSA Project SEP is provided below.

The main objective of the SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. It also outlines a communication strategy with the project stakeholders and offers mechanisms for stakeholders to raise concerns, provide feedback, or make complaints about project.

Stakeholder engagement is critical in the development of the project to understand the opportunities and risks relating to the proposed FSA component.

Preliminary and initial engagement with FSM education stakeholders, including land owners of the PATS has been undertaken as part of the preparation of this preliminary ESMP, and will continue throughout the life of the project, particularly in the early stages when project details are finalized.

As to be set out in the Stakeholder Engagement Plan, broader consultations relating to the project development and implementation will be undertaken, in culturally appropriate formats, and where appropriate, consultations may be gender focused to identify specific education issues relating to gender and SEA and SH.

9.1. Key Stakeholders

The key stakeholders for the PATS Project include:

- Catholic Church: Tamworohi Parish and Vicariate and Roman Catholic Community of Pohnpei as owners of the PATS site.
- Current occupiers/users of the former PATS site (estimated at 7 families).
- Communities and stakeholders in the general area of the former PATS site.
- Pohnpei State Environmental Protection Agency – EPA (for oversight of the FSA renovation).
- Potential and participating students in FSM who will benefit from the new FSA facility.
- Participating FSM employers who will benefit from an improved source of skilled labor including from intern placement of FSMSA students as part of the SEEP.
- Schools/education providers participating in SEEP.
- Pohnpei State Department of Education.

9.2. Engagement during Development of Safeguards Instruments

The SEEP Project has been developed to address a range of issues in the FSM education and employment sector that have been identified over a lengthy period and through a range of programs. Specific stakeholder engagement for the preparation and implementation of the SEEP Project, including to inform the development of safeguards instruments, has occurred through meetings with TVET providers, TVET students, graduates & alumni, chambers of commerce, business representatives and NDOE. There have also been meetings with NDOE including specific considerations for the former PATS including works for inclusion in the renovation, potential volume of students, and types of courses.

9.3. Engagement with community stakeholders during Construction Works

Consultation with stakeholders potentially affected by FSA construction activities will take place in two phases:

1. Direct engagement with residents and community's resident or working in areas close to proposed FSA building activities. This consultation will be required to inform the residents

and communities of any potential disruption associated with the works, and should be undertaken face-to-face. During these meetings, the scope of works will be described in detail, including the timing, likely impacts, and details on the grievance mechanism. Consultation will also be undertaken once the scope of works and building program has been determined and then again two weeks prior to construction commencing. This engagement will also communicate details on the future operation of the FSA facility, highlighting any local benefits and opportunities.

2. Public notification of civil works. Whilst the construction works are unlikely to cause broader disruption and inconvenience, notices will be published to advise people about the upcoming works including timing, duration and grievance redress procedures.

Consultation should be undertaken by the contractor's supervisor pursuant to the SEEP program, with oversight by CIU Safeguards Team.

9.4. Engagement of technical experts during Project preparation and inception

It may be necessary to recruit consultants/contractors to assist with the design of renovating the former PATS facilities and some supervision of works. This work will be guided by ongoing consultation with key stakeholders including contractor's supervisor pursuant to the SEEP program, with oversight by CIU Safeguards Team.

10. GRIEVANCE MECHANISM

The SEEP SEP sets out the project GM whereby project stakeholders, beneficiaries and members of the public can make contact with personnel involved with the project to raise issues, concerns, complaints or queries and have those matters addressed in an expeditious manner.

The SEEP Grievance Mechanism (GM) will be a central part of stakeholder engagement and the environmental and social risk management processes. The key tenants of this instrument need to be fully integrated into stakeholder engagement and communications. A preliminary GM is provided in Table 1, which will be refined during project implementation.

The objective of the GM will be to allow those who believe they are impacted by FSA project to express concern/issues and seek satisfactory resolution to grievances they may have relating to Project activities.

Grievances may include:

- **Environmental issues** – such as excessive noise generation or contractor malpractices, excessive vegetation clearance.
- **Social Issues** – such as insensitive social interactions by Contractor with local populations, gender-based violence (GBV) and other social and cultural issues.

The best methods to ensure that the GM is widely accessible, easy to understand (i.e. available in English, Pohnpeian) and locally relevant to stakeholders associated with the former PATS renovation project will be identified during project start-up and before commencement of any activities. The project will also ensure regular review of the GM to ensure concerns are being identify and addressed proactively and effectively.

Any person may wish to find information about the project. They may also seek to express a dissatisfaction, concern, or complaint about the project because they believe they have been or will be negatively impacted by project activities. Concerns may be raised about facilities or services provided, or about actions or lack of actions taken, and concerns can be raised by individuals or groups.

Concerns may be raised orally or in writing via social media, email, phone call, in person or by letter, and may also include inquiries, recommendations, suggestions, or requests.

Labor-related Issues:

A separate GM will be developed for the specific labor related issues. This process is set out in the SEEP Labor Management Procedure (LMP) which will be prepared for the Project prior to engagement of the Construction contractor.

GBV/SEA/SH Issues:

A specific GM pathway over and above the GM processes detailed below will be established for GBV/SEA/SH complaints for the FSA Project. This will ensure survivor-centered approaches are applied, including the involvement of local GBV service providers.

Table 1. Preliminary FSA and SEEP Grievance Mechanism Process.

Step	Process	Duration
1	The Aggrieved Party (AP) takes their grievance to the SEEP PIU, Project Manager, Design and Supervision consultant, Contractor, or contact through the FSM DoFA website or email. Relevant case information is recorded (e.g. Grievance Form with all key details, maps, notes of meetings, photos, etc).	Anytime

	All grievances (construction and non-construction related, and those related to GBV/SEA/SH) are to be forwarded to the PIU Project Director for screening and record keeping.	
2	Upon receipt of the grievance the PIU Project Manager is to screen the grievance to assess whether it is related to the SEEP, and environmental and social issues. Non-eligible grievances (i.e. those not Project related) are then to be referred to the relevant agency to follow up, if appropriate.	Within 1 day of grievance lodged
3	The PIU Project Director will endeavor to resolve any complaint/issue immediately. If satisfactorily resolved the incident and resultant resolution/corrective action will be logged and reported to the PIU Project Director and copied to the CIU (Program Manager and Safeguard Team).	Within 2 weeks of grievance lodged
4	If unsuccessful (i.e. AP is not satisfied), the PIU Project Director and the CIU Program Manager/ Safeguards Team are to address and resolve the complaint. The proposed corrective action is to be reported back to the AP for agreement.	Within 2 weeks of grievance lodged.
5	Where the complaint has not been resolved, the PIU Project Director will refer the grievance to the NDOE Secretary for his/her action/resolution. The PIU Project Director will log the details of issue and resultant resolution status (copy CIU Program Manager and Safeguard Team).	Within 2 weeks of grievance lodged.
6	If the matter remains unresolved, or the AP is not satisfied with the outcome, the NDOE PIU Project Director refers the matter to the Project Steering Committee (PSC) for a resolution, copying the PIU Project Manager. The PIU Project Manager will log details of issue and resultant resolution status (copying CIU Program Manager and Safeguard Team).	Within 1 month of grievance lodged
7	Once the agreed corrective actions are implemented, and the PIU Project Director notifies the claimant of the result in writing.	Within 1 week of resolution
8	If it remains unresolved or the complainant is dissatisfied with the outcome proposed by the PSC, the AP may refer the matter to the appropriate legal or judicial authority. A decision of the Court will be final.	Within 3 months of grievance lodged (where possible) or otherwise as agreed between parties during the process.

11. MONITORING AND REPORTING

The CIU Safeguard Team is responsible for monitoring and reporting on implementation and outcomes of this preliminary ESMP and the SEEP projects ESCP, SEP (including GM) and LMP, and reporting to NDOE PIU and DoFA. Specific monitoring tasks anticipated include (these tasks will be further defined once the scope of works is known in the Final ESMP):

- LMP: Checking that LMP has been complied with on engagement of design and supervision consultants and contractors. Each process will be checked prior to contract signing and CIU Safeguard team will provide feedback to ensure compliance.
- LMP: Checking that the LMP GM has been explained to workers and that grievances are being managed and closed out as per the LMP and ESS2. Within two months of workers being engaged and the GM progress checked at least 6 monthly or within one month of a grievance being lodged.
- Facility Design: The CIU Safeguard Team will monitor the design outputs to check against the ESMP, EHG Guidelines and ESS to ensure there is compliance prior to bid documents being prepared. CIU feedback will be incorporated into final design.
- Works: The CIU Safeguard Team will conduct at least monthly visits to work sites to monitor the environmental and social performance of Contractors. The first visit will be prior to works commencing. They will prepare a checklist for site visits to observe compliance with the CESMP and prepare reports. Any non-conformances will be reported to the PIU and an action plan will be prepared and implemented to resolve the non-conformance. All monitoring will be observational.
- Works: The Design and Supervision consultant will conduct environmental and social audits during their regular work site visits to monitor the environmental and social performance of Contractors. The CIU Safeguard Team will prepare a checklist for their site visits. Any non-conformances will be reported to the CIU Safeguard Team and PIU and an action plan will be prepared and implemented to resolve the non-conformance.
- GM: The CIU Safeguard Team will monitor GM implementation on a 2 monthly basis, recording – number of grievances, complaints and queries lodged, number outstanding, number closed.
- Incident monitoring: Any complaints or incidents, such as noise, will be monitored on a case by case basis.

The CIU Safeguard Team will provide monthly reports to NDOE PIU and DOFA CIU on construction supervision. Reports will include a progress report, monitoring outcomes, incidents, and summary of key risks requiring management.

In the case of an environmental or social incident, this will be promptly reported by the PIU to the Bank. This will include any incident or accident related to the FSA renovations which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers. Minor incidents will be reflected in the six-monthly reports to the bank but serious incidents will be notified immediately (within 24 hours) with follow up as necessary.

12. CAPACITY DEVELOPMENT

The CIU safeguard team will work with the PIU to apply the preliminary and final ESMP and other instruments as required throughout the project. The team will contribute to the development of annual work plans, and ensure activities such as consultation, environmental and social site visits and review of bid documents are included.

This team is responsible for training the PIU, CIU, Project Steering Committee, and other GoFSM staff involved in the FSA renovations on their environmental and social roles and responsibilities. This could include:

- Training all those involved in the GM including SEA/SH.
- Consultation and engagement training, awareness raising and support.
- ESMP, FSM and Pohnpei State legal obligations and WB Group EHS Guidelines requirements for facility design, construction and operation.

It is anticipated that specialist resources will be engaged by the PIU to address SEA/SH risks, deliver training on the code of conduct, and support SEA/SH related grievances if applicable. A preliminary budget has been provided in the next section and will be finalized in the final ESMP.

13. BUDGET

The following is an indicative budget for implementing the FSA preliminary ESMP. The budget will be further reviewed and updated in the final ESMP. These items are over and above those considered to be covered by normal operations and normal duties of the CIU environment and social safeguard team, which are covered by the CIU budget. Contractors environmental and social management will be incorporated into the Contractor's costs.

Budget Item	Detail	Cost Estimate US\$
Stakeholder Consultations	Catering, venue hire, media, materials, travel and accommodation, translation and interpretation services, etc.	\$2,500.00
Capacity Development, Training, Awareness raising including SEA/SH.	Venue, stationery, refreshments, training materials and delivery.	\$2,500.00
Monitoring and Reporting	Travel to FSA site (all within Pohnpei – CIU safeguard team is based)	\$1,000.00
GM related Costs	Personnel, communication, transportation, office support costs include SEA/SH	\$1,000.00
Total US\$		\$7,000.00

14. ANNEXES

- 14.1. Annex 1: FSA preliminary Safeguard Screening: Initial Environmental and Social Risk Screening Forms.**
- 14.2. Annex 2: Preliminary ESMP: Environmental and Social Impact Mitigation and Monitoring Table – FSA Renovations – SEEP.**
- 14.3. Annex 3: Health and Safety Management Plan Guidelines**

Annex 1: FORMER PATS Preliminary Safeguard Screening Form 1: Initial Environmental and Social Risk Screening

Name of Works:	Former PATS Renovation Component – FSA - SEEP Project
Location of Works:	Tamworohi Parish, Madolenihm Municipality, Pohnpei State FSM.
Description of Works:	YET TO BE DETERMINED. Removal of existing school building and associated infrastructure and renovation/replacement.
Date of Form Completion:	November 2021.
Name/Position of Person Completing Form:	DoFA CIU Safeguard Team – International Safeguard Advisor (Mr. Lindsay) and National Safeguard Coordinator (Mr. Kilmete).
Date of Site Visit:	No site visit – all information collected from documents associated with the proposed area and knowledge of safeguard team and FSM government colleagues.
People consulted to date (to inform completion of form):	CIU Safeguard team.
Attached concept description Yes/No:	No. Still under development.

Activity	Impact Screening - without mitigation ⁹					Justification (nature, scale, duration of impact/s or sensitivity of receptors)	Recommended Actions	
	Yes No?	No Impact	Low - Minor Impacts	Moderate Impacts	High – extreme Impacts			
1.0	Environment							
1.1	Any vegetation clearance or works within a forest or native terrestrial or wet lands area of biological significance?	No					All land within the land parcel has been previously modified, extensively cleared, and utilized for previous PATS activities – including buildings, roads, sport field etc. resulting in significant physical ecosystem alteration/modification.	No specific action required. Final ESMP based on final scope of works needs to confirm.
1.2	Any vegetation clearance or works within a river/stream (riparian) adjacent to/or within areas of biological significance?	No					Although streams are located within the land parcel they are not expected to be within the area of influence of the project and as such not impacted. These systems have been modified and impacted previously due to activities on the land parcel resulting in physical ecosystem modification.	Ensure site specific Final ESMP developed & mitigation measures are implemented based on final scope of works. Sedimentation discharge into waters ways to be avoided and mitigation measures implemented where needed.

⁹ The four 'Risk Levels' are: Extreme - those impacts that require immediate action at the highest level of management, High - those impacts requiring action at senior management level; Moderate - those that require policies in place to address impacts and monitoring programs; and Low - those impacts that do not require any specific management actions but may be part of routine management and monitoring plans.

Activity		Impact Screening - without mitigation ⁹					Justification (nature, scale, duration of impact/s or sensitivity of receptors)	Recommended Actions
		Yes No?	No Impact	Low - Minor Impacts	Moderate Impacts	High – extreme Impacts		
1.3	Any coastal vegetation – habitat clearance (e.g., mangroves, shoreline, estuary) of biological significance?	Yes		✓			Shoreline habitat within PATS is expected to be outside of the projects scope of works, however is close to a marine area of biodiversity significance. Foreshore has been highly modified, extensively cleared, and utilized for previous PATS activities – including buildings, shoreline protection and small boat ramps resulting in significant physical ecosystem alteration/modification.	Ensure site specific Final ESMP developed & mitigation measures are implemented based on final scope of works. Sedimentation discharge into waters ways to be avoided and mitigation measures implemented where needed.
1.4	Is the project area identified as possessing a high ecological significance, protected, managed or conservation areas.	No					All land, riparian and coastal areas within and directly adjacent to PATS have been altered and modified and as such do not have nor have they been identified as significant ecological areas. However, a marine area of biodiversity significance is located in close proximity. Thus ensuring existing ecosystem functions needs to be maintained during all works and its long term operation.	Ensure site specific Final ESMP developed & mitigation measures are implemented based on final scope of works. Coastal, riparian and shallow water marine mitigation measures need to be implemented.

Activity		Impact Screening - without mitigation ⁹					Justification (nature, scale, duration of impact/s or sensitivity of receptors)	Recommended Actions
		Yes No?	No Impact	Low - Minor Impacts	Moderate Impacts	High - extreme Impacts		
1.5	Any works within an identified Hazard zone (e.g., erosion, flooding, coastal inundation)?	No					Periods of excessive rainfall have in the past caused short lived, small localized terrestrial flooding events and greatly increase coastal discharge of local streams. These events have caused localized infrastructure damage and increased coastal erosion.	Ensure site specific ESMP includes design mitigation methods needed to provide resilience to these weather events.
2.0	Socio-cultural							
2.1	Any likely physical displacement/relocation of people.	YES			✓		The PATS facility is not operational, however care takers of the land and facilities through agreements with the Catholic Church of Pohnpei are temporally accessing and in some cases residing in several of the buildings. These people under agreement will go back to their family homes once PATS project is commissioned.	Ensure final ESMP, SEP and participatory approach is undertaken to inform and gain support of land owners and community.
2.2	Any likely economic displacement (e.g., temporary or permanent land acquisition, disturbance of	Yes		✓			Possible lay down areas required during construction (removal and replacement of building material) which may impact existing crop/fruit trees. It is not expected any	Ensure final ESMP, SEP and participatory approach is undertaken to inform and gain

Activity		Impact Screening - without mitigation ⁹					Justification (nature, scale, duration of impact/s or sensitivity of receptors)	Recommended Actions
		Yes No?	No Impact	Low - Minor Impacts	Moderate Impacts	High - extreme Impacts		
	physical assets, crops/fruit trees etc).						disturbance/removal of other physical assets. Possible small short term disruption to livelihood to individuals currently caretaking within former PATS whilst moving back to their normal residence. All dependent on final design.	support of land owners and community.
2.3	Any identified cultural/historic sites (e.g., graves, historic buildings etc) directly adjacent to road easement in vicinity of the works (i.e., within 50m of site) or otherwise could be affected by physical works.	Yes		✓			Cultural/historic building/site within the proposed site have been identified (Church), and there is a possibility of a chance find during construction. Grave yards and other cultural significant assets are located within the project site surrounding area and need to be protected.	Ensure final site specific ESMP include design mitigation methods need to be implemented to provide protection of these sites/assets – chance find procedures need to be implemented as required.
2.4	Any potential access restriction to sensitive receptors / essential services (e.g., hospital, school, church etc).	Yes	✓				Access to essential services can be maintained throughout the construction phase resulting in limited if any impact to users. Current former PATS is not operating (since 2004) and is assumed it will not be	Ensure final site specific ESMP include design mitigation methods need to be implemented to provide access to all users during project.

Activity		Impact Screening - without mitigation ⁹					Justification (nature, scale, duration of impact/s or sensitivity of receptors)	Recommended Actions
		Yes No?	No Impact	Low - Minor Impacts	Moderate Impacts	High - extreme Impacts		
							operational until upgrades are made.	
2.5	Risk to community health & safety from the proposed works (i.e., communities in close proximity to work site) or construction workforce (e.g., imported/migrant labor related risks)?	Yes		✓			PATS is located in a rural area of Pohnpei and as such is isolated from the general communities, however land owners reside along the boundaries and road entering and departing PATS and as such impacts from the scope of works and work force are possible.	Ensure site specific ESMP is developed & mitigation measures are implemented to address these issues. In addition, the projects LMP and SEP are to be implemented.
2.6	Is there a risk of UXOs being present in the works footprint?	Yes		✓			The footprint of the works will be within the exiting PATS land parcel that has been previously extensively modified and built on. As such past activities have most likely identified and removed potential UXO as such the chance of a UXO is extremely rare.	ESMP provides process and protocols to be implemented in the rare chance that an UXO is discovered.

Summary of Risk for Component 2.1 renovation sub-project according to World Bank ESF Risk Ratings: Moderate.

Annex 2. Preliminary ESMP: Environmental and Social Impact Mitigation and Monitoring Table – FSA Renovations – SEEP.

Environment al Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/ Duration	Implementation Entity	Supervision
1.0 Pre-Construction Period (Planning and design actions to prevent impacts)								
1.1 Physical Environment								
Land Access	Unable to secure access to sites.	<ul style="list-style-type: none"> ▪ Acquire landowner ownership and approvals before work begins. ▪ Transfer of any entitlements & keep documentation. 	PIU	FSA	Confirm land access ownership and agreements are finalized and meet approval process.	Prior to start of installation.	PIU	PIU & CIU safeguard team.
Climate Change Impacts	Climate change impacts not included in design	<ul style="list-style-type: none"> ▪ Ensure building & associated facilities have a design life of 20 plus years. ▪ Ensure design includes future impacts efficiency for all renovations. ▪ Energy, water efficiency 	PIU	FSA	Confirm contract specifications and compliance certification.	Prior to start of installation.	PIU	PIU & CIU safeguard team.
Asset damage, loss of disruption to Access	Inadequate design, location, replacement of assets.	Contractor's specification to include; <ul style="list-style-type: none"> ▪ Water management systems capable of local conditions, ▪ Limit asset removal, damage to reduce livelihood impacts. 	PIU	FSA	Confirm contract specifications and compliance certification.	Prior to start of installation.	PIU	PIU & CIU safeguard team.

Environment al Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/ Duration	Implementation Entity	Supervision
		<ul style="list-style-type: none"> Reduce infrastructure renovation to limit inconvenience to FSMSA users. 						
Identify Hazardous Material	Hazardous material not identified and not managed.	Contractors specification to include the identification and management of all hazardous material existing on site and its safe remove, storage and dispose.	PIU	FSA	Confirm contract specifications and compliance certification.	Prior to start of installation.	PIU	PIU & CIU safeguard team.
UXO	Failure to complete an unexploded ordinance (UXO) sweep of former PATS sites could lead to explosion, damage infrastructure and loss of life.	<p>Conduct a UXO survey if new ground is required to be excavated.</p> <p>IF UXO is located immediate action required includes;</p> <ul style="list-style-type: none"> Instigate immediate appropriate health and safety arrangement of all workers and general public including notification of Pohnpei Police and government agencies (including Governors office). <p>Secondary action to discuss requirements to finalize alignment, possible actions include;</p> <ul style="list-style-type: none"> Removal of UXO (explosion in situ or translocate). 	PIU	FSA	Conform assessment undertaken as required.	Prior to start of any new land excavation	PIU	PIU & CIU safeguard team.
1.2 Ecological Environment								
Sensitive receptors culture heritage, natural or critical habitats.	Failure to design avoidance of these receptors.	<p>Prepare final design to avoid impacting cultural (e.g. buildings, graves, historic sites) and physical natural terrestrial, riparian and coastal habitats.</p> <p>All natural resources should be preserved, where possible and guidelines to this effect included in the design specifications.</p>	PIU	FSA	Confirm adequate specifications are presentation in bid documents.	Prior to start of installation.	PIU.	PIU & CIU safeguard team.

Environment al Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/ Duration	Implementation Entity	Supervision
Conservation Areas (PA)	Disturbance of marine & terrestrial resources & habitats in protected – managed areas.	All works to avoid direct and indirect impacts to Conservation Areas through design specifications.	PIU	Inshore, Coastal & Terrestrial areas within and adjacent to FSA	Confirm adequate specifications are presentation in bid documents.	Prior to start of installation.	PIU.	PIU & CIU safeguard team.
Vegetation clearance	Disturbance &/or removal of vegetation in close proximity to building renovations.	Prepare final design based on demonstrating avoidance where possible to reduce and/or eliminate removal of vegetation (e.g. trees). Including in contract specifications	PIU	Terrestrial areas.	Confirm adequate specifications are presentation in bid documents.	Prior to start of installation.	PIU.	PIU & CIU safeguard team.
1.3 Social and Socio-Economic Environment								
ESMP safeguard implementation & monitor	Inexperienced technician leading to delayed or failed implementation of ESMP items, e.g. no clauses in the bid docs.	Ensuring safeguards monitoring is undertaken for the duration of the project (especially construction phase) to help in implement and monitor the delivery of the projects final ESMP.	PIU	FSA	Confirm safeguard staff/s are engaged and fully briefed at start of the project.	At start of detailed design stage for the project duration.	PIU.	CIU safeguard team & PIU.
Update ESMP, bid & contract documentation bid evaluation etc	Environmental responsible – procurement & compliance with ESS.	<ul style="list-style-type: none"> ▪ Update preliminary ESMP to reflect the final scope of works and develop consent conditions included in bid document. ▪ Contractor prepares and submits terrestrial CESMP for approval before works start. 	PIU & CIU safeguard team.	N/A	Confirm adequate specifications are included in bid and contract documents.	Before civil work starts.	PIU.	PIU & CIU safeguard team.
Community Information Engagement	Misconceptions raising people’s misunderstanding (fears) regarding project footprint and area of influence and potential impacts/ damages	Conduct a series of government and non-government community stakeholder consultations prior to commencement of civil works, during construction and after project completion.	PIU & CIU safeguard team.	FSA and neighbouring residents impacted by the project.	Confirm adequate stakeholder consultations have been undertaken and stakeholders aware.	During all stages of the project.	PIU.	PIU & CIU safeguard team.

Environment al Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/ Duration	Implementation Entity	Supervision
Social & Economic Displacement / entitlements.	Minor impacts associated with current caretakers returning to their normal residences.	Conduct a series of government and non-government community stakeholder consultations prior to commencement of civil works, to ensure awareness and understanding of the process and entitlements.	PIU & CIU safeguard team.	FSA and neighbouring residents impacted by the project.	Confirm adequate stakeholder consultations have been undertaken and stakeholders aware of entitlements.	Before civil works begin.	PIU.	PIU & CIU safeguard team.
Community Grievances	Minor concerns/issues developing community resentments due to unaddressed project related concerns.	Establish GM prior to commencement of civil works for use throughout the life of the project and ensure project stakeholders are aware of it usage.	PIU & CIU safeguard team.	FSA and neighbouring residents directly impacted by the project.	Confirm GM requirements are included in bid and contract documents.	Before civil works begin.	PIU.	PIU & CIU safeguard team.
2.0 CONSTRUCTION PERIOD: Impacts associated with the work.								
2.1 Physical Environment								
2.1.1 Marine								
Substrate (shore line)	Introduction of foreign substances reacting with environment or introduced medium for introduced organisms.	Contractor to insure that: <ul style="list-style-type: none"> All backfill use only original material. No discharge of waste material and/or waste water into coastal systems. 	PIU	Inshore Coastal areas within FSMSA work site.	Site inspections to ensure compliance to ESMP.	During works.	Contractor (s)	PIU & CIU safeguard team.
2.1.2 Terrestrial								
Air Quality - Pollution	Emissions from all vehicles and machinery used for the project.	Ensure all vehicles and machinery used are; <ul style="list-style-type: none"> Maintained and operated in accordance to design standards and specifications; Turned off when not in use; Only vehicle and machinery undertaking work are on site. 	PIU	At all terrestrial work site/s within FSMSA.	Vehicle inspections to ensure compliance to CESMP mitigation measures.	From the time vehicles and machinery work on this project.	Contractor (s)	CIU safeguard team & PIU.

Environmental Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/Duration	Implementation Entity	Supervision
	Increase in dust levels on site and neighbouring land parcels from vehicles and machinery used.	<p>Ensure dust management measures are implemented at all construction site/s including;</p> <ul style="list-style-type: none"> ▪ Restrict speed on roads during equipment transportation. ▪ Cover all vehicles to prevent load spillage, dust & sludge (e.g. waste material transportation); ▪ All stockpiles to be covered to prevent dust dispersion through wind. 	PIU	At all terrestrial work site/s within FSA.	Periodic vehicle and site inspections to ensure compliance to CESMP mitigation measures.	From the time vehicles and machinery work on this project.	Contractor (s)	CIU safeguard team & PIU.
Noise & Vibration from construction equipment and machinery	<p>Increase noise & vibration at FSA & in community (residential & commercial).</p> <p>Impact on construction workers.</p>	<ul style="list-style-type: none"> ▪ Construction vehicles and equipment to be maintained in good working order and regular equipment maintenance will be undertaken. ▪ Construction vehicles and machinery to be fitted with mufflers and other noise abatement equipment as necessary. ▪ Limit noisy construction activities to be between 7am and 5pm on Monday to Saturday. No work is to be undertaken on Sunday. ▪ Workers will be provided with noise abatement equipment (PPE) as required. <p>The contractor will deal with any complaints regarding noise in the first instance through the GM.</p>	PIU	At all terrestrial work site/s within FSA.	Periodic vehicle and site inspections to ensure compliance to CESMP mitigation measures.	From the time vehicles and machinery work on this project.	Contractor (s)	CIU safeguard team & PIU.
Sediment & erosion from construction.	Increase erosion and sedimentation in surrounding environment including stream and downside foreshore areas.	<ul style="list-style-type: none"> ▪ Preparation of sedimentation and erosion control management plan as part of CESMP (compliant to the final ESMP specifications). ▪ All construction in areas of stream and coast to be undertaken with extreme care, avoid if possible. ▪ Use of silt control devices and sediment traps/fences during all extraction activities, these to be 	PIU	At all terrestrial work site/s within FSMSA.	<p>Confirm sediment and erosion plan is compliant to bid documents.</p> <p>Periodic site inspections to ensure compliance to CESMP mitigation measures.</p>	From the time vehicles and machinery work on this project.	Contractor (s)	CIU safeguard team & PIU.

Environmental Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/Duration	Implementation Entity	Supervision
	Increased turbidity of watercourses due to construction.	<p>cleaned and dewatered as required.</p> <ul style="list-style-type: none"> ▪ Avoid clearing areas during wet (rainy) season where possible. ▪ Natural stream/river water flows in river will not be interfered with. ▪ Use of heavy machinery in aquatic environments minimized (used only if no other alternative). ▪ No discharge to rivers, surface water, intertidal or coastal areas. ▪ No dumping, disposal or storage of spoils in or close to streams and rivers. Placement of diversion ditches around stockpiles, as required. 						
Construction waste material use and management.	<p>Introduction of foreign substances reacting with environment or introduced medium for introduced organisms.</p> <p>Waste material reused or disposed in approved sites.</p>	<p>A Waste Management Plan (WMP) is to be developed and included in the project CEMP.</p> <p>Contractor is to insure the WMP is compliant to the ESMP including:</p> <ul style="list-style-type: none"> ▪ All backfill used only original material. ▪ All waste material dumped at approved and permitted (EPA) landfill site/s. ▪ Hazardous Waste Management plan to be included in the CESMP and an emergency response action plan. ▪ Hazardous waste managed by contractor and disposed at approved permitted (EPA) site. 	PIU	At all terrestrial work site/s within FSA.	<p>Confirm WMP is compliant to bid documents.</p> <p>Periodic site inspections to ensure compliance to CESMP mitigation measures.</p>	From the time the vehicles and machinery work on this project.	Contractor (s)	CIU safeguard team & PIU.
Use, storage & transportation of Hazardous substances)	Pollution from use, storage & accidental spills of hazardous substances.	<ul style="list-style-type: none"> ▪ Contractor to prepare hazardous substances management plan (HSMP) and emergency response plan (ERP) (as part of the CESMP). ▪ Spill kits to be provided at work sites and/or works yards and staff trained in their deployment. 	PIU	At all terrestrial work site/s within FSA.	<p>Confirm HSMP is compliant to bid documents.</p> <p>Periodic site inspections to ensure compliance to CESMP mitigation measures.</p>	From the time the vehicles and machinery work on this project.	Contractor (s)	CIU safeguard team & PIU

Environmental Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/Duration	Implementation Entity	Supervision
e.g. fuel, oil etc)	Accidentally placing people and environment at risk.	<ul style="list-style-type: none"> ▪ Locate storage areas for all petrochemical products 100m away from coastline and stream/rivers. ▪ Chemicals including fuel stored in secured (lockable), weather proofed area including an impervious flooring and bund/containment walls (110% of largest volume) to contain spillage. ▪ Used oil and other hazardous materials will be disposed of in an authorized (EPA) permitted facility off-site. ▪ Spill waste will be disposed at disposal sites approved by local authorities (EPA). ▪ All spills cleaned as per emergency response plan. ▪ Ensure any spills or accidents are reported and recorded in register. 						
Construction activities affect site access, road use and/or access to property within and outside of FSA.	Public access affected & traffic disruption during construction.	<ul style="list-style-type: none"> ▪ Prior to commencement of works, the contractor will assess impacts and as required prepare and submit a Traffic Management Plan (TMP) detailing controls, diversions and management/safety measures for clearance. ▪ The contractor and PIU will inform commuters, providers of transport services and adjacent community/business of duration and scope of works and any alternative arrangements. ▪ Clauses will be included in the contract specifying that; (i) care must be taken during the construction period to ensure that disruptions to access and traffic are minimized outside of the FSMSA site and (ii) access to residences/business along the road will always be maintained. 	PIU	At all terrestrial work sites.	<p>Confirm TMP is compliant to bid documents.</p> <p>Periodic site inspections to ensure compliance to CESMP mitigation measures.</p>	From the time vehicles and machinery work on this project.	Contractor (s)	CIU safeguard team & PIU.

Environmental Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/Duration	Implementation Entity	Supervision
		<ul style="list-style-type: none"> ▪ Stakeholders and potentially affected people will be consulted if access to specific areas will be disrupted for any time and temporary access arrangements made. ▪ Use of signage, spotters and flaggers, safety barriers suitable to the scale of the project to control and regulate traffic and pedestrian flow and ensure safety for workers and all users. ▪ Ensure public safety across and around work site(s) including barriers to prevent entry to high risk areas (e.g. excavations, building renovations areas with heavy machinery being used) and ensure safe passages are provided through work site/s. ▪ At all times, the site/s will be kept free of debris, spoil, and any other material. ▪ All waste material to be disposed at approved (EPA) designated sites. 						
<p>Construction activities affect school operations and access</p>	<p>School disruption due construction and renovation works.</p> <p>Currently school is not operating unsure if this will remain during project development.</p>	<ul style="list-style-type: none"> ▪ Prior to commencement of works, the contractor will prepare and submit a Construction Plan (included in CESMP) detailing timing and management/safety measures for the work. Plan to be developed in conjunction with FSMSA management. ▪ Limit construction activities to designated school holiday periods if possible otherwise restricted to weekend (Saturday only) or after school hours. Preferably work completed before school reopens. 	PIU	Work undertake within - FSA site.	<p>Confirm construction plan is compliant to bid documents – specifically outlining schedule and timing of work – no disruptions to school operation if school activities recommence before construction work completed.</p> <p>Periodic site inspections to ensure compliance to CESMP mitigation measures.</p>	From the time work at this site is undertaken.	Contractor (s)	CIU safeguard team & PIU.

Environment al Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/ Duration	Implementation Entity	Supervision
Site earthworks (excavation & backfill)	Vegetation removal – minor ecosystem disruption during construction – limited to existing buildings footprint and area of influence.	<ul style="list-style-type: none"> ▪ Vegetation clearance during construction activities, especially trees and vegetation in close proximity to the buildings being renovated, will be kept to a minimum and trees removed will be discussed with landowners and an approved plan to be developed. ▪ Under no circumstances is the contractor permitted to fell or remove mangroves or trees along a river bank. ▪ Construction workers to be informed about general environmental protection including and respect of local (native and human) flora and fauna. 	PIU	At all terrestrial work site/s within FSA.	<p>Confirm landowner’s discussions undertaken and project awareness is fully understood.</p> <p>Periodic site inspections to ensure compliance to CESMP mitigation measures.</p>	From the time vehicles and machinery work on this project.	Contractor (s)	CIU safeguard team & PIU.
Relocation of or damage to existing utilities & services.	Disruption of, interference with and/or damage to existing infrastructure and/or services.	<ul style="list-style-type: none"> ▪ Consult infrastructure and services providers (e.g. FSM telecom, Pohnpei Water and Power providers) before construction to identify on plans the location of utility lines and pipes. ▪ Relocation plans, as required, to be agreed and implemented. ▪ Any incidental damage to be immediately notification and repaired as agreed with the utility provider. 	PIU	At all terrestrial work site/s with FSA.	<p>Confirm service providers have been engaged and plans develop in compliance to bid documents.</p> <p>Periodic site inspections to ensure compliance to CESMP mitigation measures.</p>	From the time vehicles and machinery work on this project.	Contractor (s)	CIU safeguard team & PIU.
Update FSMSA specific LMP, SEP & ESMP.	Site specific instruments not updated and to reflect site specific requirements.	<ul style="list-style-type: none"> ▪ Ensure site specific LMP, SEP and ESMP are updated to reflect site specific requirements based on the scope of works for the project. ▪ Ensure implementation of updated instruments and contractors compliance. 	PIU	Within all work site/s and project area of influence with FSA.	<p>Confirm contractors have been engaged and plans develop in compliance to bid documents.</p> <p>Periodic site inspections to ensure compliance to CESMP mitigation measures.</p>	From the time vehicles and machinery work on this project.	Contractor (s)	CIU safeguard team & PIU.
2.2 Ecological Environment								
2.2.1 Marine								

Environment al Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/ Duration	Implementation Entity	Supervision
Marine Coastal Conservation Areas	Disturbance of marine organisms and habitats in CA.	All works to avoid direct and indirect impacts to marine Conservation Areas through design specifications.	PIU	Inshore Coastal areas adjacent to FSA.	Confirm adequate specifications are presentation in bid documents.	From the time work begins on this project.	Contractor (s)	CIU safeguard team & PIU.
Sensitive receptors coastal and marine natural or critical habitats.	Disturbance of marine and coastal organisms and habitats.	All works to avoid impacting physical natural coastal/marine habitats. All natural resources should be preserved, where possible and guidelines to this effect included in the design specifications.	PIU	Inshore Coastal areas adjacent to FSA.	Confirm adequate specifications are presentation in bid documents.	From the time work begins on this project.	Contractor (s)	CIU safeguard team & PIU.
2.2.1 Terrestrial								
Sensitive terrestrial ecological habitats and resources (streams, mangroves, birds).	Destruction of sensitive terrestrial ecological habitats and resources (e.g. stream, mangroves).	Contractor(s) to adhere to renovations within the FSMSA grounds and buildings / infrastructure to be repaired; <ul style="list-style-type: none"> ▪ All activities within area of influence including approved lay down areas. ▪ Implement measures & controls to minimize impacts on surrounding habitats. ▪ Avoidance of impacts to stream bed, riparian habitats and mangroves habitats. ▪ Resource extraction (flora and fauna) prohibited by contracted and project workers. 	PIU	Coastal foreshore & terrestrial areas within FSA area of influence.	Inspect renovation works and undertake stakeholder discussions to confirm compliance to CESMP mitigation measures.	From the time vehicles and machinery work on this project.	Contractor (s)	CIU safeguard team & PIU.
FSA and neighbouring landowner's properties adjacent to road corridor.	Destruction of ecological terrestrial systems (natural and/or man made) and property owner resources (flora – food crops and fauna	Contractor (s) and workers under no circumstances are permitted to enter and remove resources (flora & fauna) from properties within and adjacent to FSA site.	PIU	All terrestrial areas within FSA area of influence.	Inspect renovation works and undertake stakeholder discussions to confirm compliance to CESMP mitigation measures.	From the time vehicles and machinery work on this project.	Contractor (s)	CIU safeguard team & PIU.

Environmental Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/Duration	Implementation Entity	Supervision
	domesticated animals).							
2.2 Socio-Economic Environment								
2.3.1 Marine								
No significant issues/impacts are expected – access to foreshore will remain open and available to all stakeholders during construction.								
2.3.2 Terrestrial								
Access	Temporary loss of access to property for FAS staff, landowners and local communities during renovations.	Provision of electronic and print notices to local communities of construction schedule and contact person in case of inquiries.	PIU	During renovation construction.	Confirm construction plan is compliant to bid documents – specifically outlining schedule and timing of work to inform community. Periodic site inspections to ensure compliance to CESMP mitigation measures.	When work is under taken.	Contractor (s)	CIU safeguard team & PIU.
General Construction Activities – Risk to workers on building renovations etc.	Risk of hazards to or accidents to workers during construction & spread of communicable diseases.	<ul style="list-style-type: none"> ▪ Contractor will provide to all workers: (i) health facilities, first aid kits, appropriate safety equipment and procedures for medical treatment; (ii) adequate training and information to workers in relation to all health and safety issues, equipment and training including STI and HIV/AIDS awareness and prevention program and (iv) access to safe drinking water, mosquito management, sun/shade management, portable, septic latrines and garbage receptacles at all work sites and office compound as required. ▪ The contractor will prepare a health and safety plan (HSP) as part of their CESMP. The HSP is to include key components of the World Bank Environmental, Health and Safety Guidelines (EHSG). ▪ The contractor will ensure they take full responsible for the 	PIU	During all renovation works.	Confirm construction plan is compliant to bid documents – specifically outlining management of risks to workers. Periodic site inspections to ensure compliance to CESMP mitigation measures.	When work is under taken.	Contractor (s)	CIU safeguard team & PIU.

Environmental Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/Duration	Implementation Entity	Supervision
		<p>implementation of the CESMP and to liaise with the residences/businesses in the subproject area, as required.</p> <ul style="list-style-type: none"> ▪ The contractor will provide adequate health care facilities including first aid facilities at the office compound and mobile first aid kits in vehicles and at work sites. ▪ The contractor will provide construction workers training on health and safety matters, specific hazards of their work, basic sanitation, hygiene and health care issues and awareness and prevention of communicable diseases (including STIs and HIV/AIDS). ▪ The contractor will be responsible for providing safety equipment and appropriate personal protective equipment (PPE) to workers, including instructions on how and when to use the equipment. ▪ The contractor will ensure safe and clean facilities include sanitation and drinking water (at least 2 liters/day) is provided to all workers. ▪ Septic tanks and garbage receptacles will be set up at work sites and office compound as required. These facilities to be regularly cleaned by the contractors to prevent outbreak of diseases. Garbage will be dumped only at a site approved by Pohnpei State (EPA). ▪ “No smoking zone” signage will be posted throughout work sites and the office compound (e.g. fuel storage areas). 						

Environmental Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/Duration	Implementation Entity	Supervision
		<ul style="list-style-type: none"> ▪ The contractor will ensure that there is adequate water manage at all sites to ensure that disease vectors such as stagnant water bodies do not form. ▪ Contractor to educate and ensure worker's actions are controlled codes of conduct are strictly observed (work sites and office compound) and Pohnpei state specific requirement (restrictions on activities on Sunday). 						
<p>General construction activities - Presence of workers in the community.</p>	<p>Risk of hazards to or accidents to members of community & spread of communicable diseases.</p>	<ul style="list-style-type: none"> ▪ Before construction commences the contractor will conduct training for all workers on their requirements to engage the local community and ensure national & State laws are respected, special consideration and respect for women, elderly and children (including the school) are to be strictly followed. Code of conduct protocols will be discussed and worker awareness as part of mobilization process including STI and HIV/AIDS education. ▪ Child and/or trafficked labor will be strictly prohibited for any activities associated with the project and children will be prohibited from entering the worker's accommodation, works area/construction zone and prohibited from playing on any equipment or machinery associated with the project. ▪ The contractor will implement relevant elements of the GM. ▪ Adequate signage and security will be provided at work sites for prevention of unauthorized people (including children) entering any work site(s) or the office 	<p>PIU</p>	<p>During all renovation works.</p>	<p>Confirm construction plan is compliant to bid documents – specifically outlining management of risks of workers on communities.</p> <p>Periodic site inspections to ensure compliance to CESMP mitigation measures.</p>	<p>When work is under taken.</p>	<p>Contractor (s)</p>	<p>CIU safeguard team & PIU.</p>

Environment al Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/ Duration	Implementation Entity	Supervision
		<p>compound. Consideration of signs in English and Pohnpean.</p> <ul style="list-style-type: none"> ▪ The public will be adequately protected near work sites, including advanced notice of commencement of works, installation of safety barriers and fences (no go areas) and signage or marking areas where works will be carried out. ▪ Provision of safe access across the works site(s) to people who's residential or business access is temporarily affected during road rehabilitation activities. ▪ The contractor will implement a Traffic Management Plan as required that will include traffic control and pedestrian safety measures. 						
Inadequate information disclosure	Failure to include stakeholders & communities in final planning & decision development.	Prior to start of work present draft renovation plan to stakeholders, seek input and obtain agreed finalize plan.	PIU	FSA area of influence.	Confirm construction plan is compliant to bid documents – specifically outlining schedule and timing of work to inform community.	When work is under taken.	PIU & CIU Safeguard team.	PIU & CIU safeguard team.
Environment al Mitigation Measure/s Completion Report	Contractor fails to prepare a summary report defining the mitigation & monitoring actions completed & what needs to be continued during the Operating period.	Contractor to prepare a completion report and deliver to the project Owners Engineer.	PIU	N/A	Confirm completion report is completed and is compliant to bid documents.	Complete within the last 4 months of the construction period.	Contractor (s)	PIU & CIU safeguard team.

Environmental Parameters	Project Impacts	Mitigation Measures	Responsible Entity	Location	Monitoring Action	Timing/Duration	Implementation Entity	Supervision
Contractor Awareness Raising	Contractor with little understanding of ESMP initiates work & causes significant damage, impacts and complaints.	Conduct a contractors CESMP implementation workshop (briefing) reviewing mitigative, monitoring and reporting project requirements.	PIU and contractor/s.	Key project location.	Confirm completion of implementation workshop and it's delivery was compliant to bid documents.	½ - 1 day.	PIU & CIU Safeguard team in conjunction with Contractor (s)	PIU & CIU safeguard team.
Contractors (workers) Health and Safe	Injury or death to contractors during contracted works.	Contractors to prepare (CESMP) and implement Health and Safety Plan (HSP).	PIU	All	Confirm contractors HSP (detailed in CESMP) is compliant to bid documents.	Submission prior to works being undertaken	Contractor (s)	PIU & CIU safeguard team.
3.0 Operating Period								
3.1 Physical and Ecological Environment								
Perceived coastal and terrestrial pollution.	Local communities fear of potential damage to marine and terrestrial resources and other resources.	Establishment of a Grievance Redress Committee (GRC) to address community concerns-issues.	PIU	FSA	Review and record operation of GRC and prepare inspection reports.	As concerns arise.	PIU and/or FSMSA.	PIU.
Impacts resulting from FSA facility operations	Potential impacts resulting from the operation of the FSA laboratories and/or mechanical equipment	Establish OH&S and E&S protocols/procedures/CoC to ensure the safe operation of all facilities within the FSA including the management of all wastes (including liquid wastes).	PIU	FSA	Review and record compliance of facility operations and prepare inspection reports.	As concerns arise.	PIU and/or FSMSA.	PIU.

Annex 3: Health and Safety Management Plan Guidelines

Project OHS Management

1 Introduction

This Appendix sets out details of OHS management relating to Project activities in terms of roles of the CIU and the various categories of project workers - Direct workers, Direct workers (Government), and Contracted workers.

2 Roles

Central Implementation Unit

The CIU Safeguards Team will be responsible for:

- Oversight of the health and safety and other related activities of Project workers as set out in this LMP;
- Review of draft bid documents;
- Review of contractor and primary supplier's tender responses;
- Review and clearance of the Contractors' Environmental and Social Management Plan;
- Training State reps in how to supervise OHS onsite on a daily basis; and
- Conducting periodic on-site visits to monitor and supervise progress.
- All CIU Project activities will be undertaken in conjunction and cooperation with the PIU.

There will be some shared responsibility between CIU and the Design and Supervision Engineering Firm for PATS. This will be determined during further Project planning.

Direct Workers

Direct workers are NDOE PIU staff and individual consultants engaged by NDOE PIU for the purposes of the Project.

Direct workers will be subject to Project-specific OHS requirements.

Direct Workers (Government)

Direct workers (Government) are FSM civil servants working either full-time or part-time on Project development and implementation but not engaged by the PIU using SEEP funds. This category includes Government civil servants in the DoFA CIU, PSC, or State agencies (KDoE; PSDoE; CDoE; and YDoE).

Direct workers (Government) will be subject to OHS requirements.

Contracted Workers

Contracted workers fall into two categories:

- (i) Consultant firms providing technical advisory services. Consultants engaged by a firm, contracted to provide technical advisory services.
- (ii) Civil works and large equipment Contractors engaged for construction activities.

Occupational Health and Safety Management Framework

Scope and Objective

This Occupational Health and Safety (OHS) framework applies to ALL categories of Project worker.

The objective of Project OHS management is to ensure that the health and safety of workers and the community is protected and that appropriate OHS measures will be incorporated into the design and implementation of the project to prevent and protect workers from occupational injuries and illness.

This Framework takes into account the provisions of the World Bank Group's *Environmental, Health, and Safety (EHS) Guidelines* (April 2007) together with the relevant Industry Sector EHS Guidelines available at www.ifc.org/ehsguidelines. For this project, the particular scope of OHS provisions in each case will depend on the nature and severity of the hazards, risks, and impacts; and the types of workers involved.

Components of Project OHS Framework

The following **general principles** are relevant to maintaining worker health and safety.

Implementation responsibilities in respect of the project in general, the tasks are the Principal Contractor and/or the employer of workers, with CIU providing support for Direct Workers and Direct Workers (Government).

Identification and Assessment of Hazards

Establish and maintain effective methods for:

- Systematically identifying existing and potential hazards to employees and the community;
- Systematically identifying, at the earliest practicable time, new hazards to employees and the community; and
- Regularly assessing the extent to which a hazard poses a risk to employees and the community.

Management of Identified Hazards

Apply prevention and control measures to control hazards which are identified and assessed as posing a threat to the safety, health or welfare of employees and the community, and where practicable, the hazard shall be eliminated. The following preventive and protective measures must be implemented order of priority:

- Eliminating the hazard by removing the activity from the work process;
- Controlling the hazard at its source through engineering controls;
- Minimizing the hazard through design of safe work systems; and
- Providing appropriate personal protective equipment (PPE).

One option available for the application of prevention and control measures to occupational hazards is to adopt comprehensive job safety analyses (JSA) or similar formal screening process.

Job safety analysis (JSA) is a process involving the identification of potential health and safety hazards from a particular work activity and designing risk control measures to eliminate the hazards or reduce the risk to an acceptable level. JSA's or equivalent systematic process must be undertaken for all discrete project activities, particularly site visits or field-work (including where there may be no designated worksite), such that the risks can be readily identified and appropriate risk management measures designed. This Framework includes a template for a JSA included below.

The results of such analyses should be reviewed by a trained person in the PIU/CIU and outcomes prioritized as part of an action plan based on the likelihood and severity of the consequence of exposure to the identified hazards.

Training, awareness and supervision

All reasonably practicable steps must be taken to provide to workers (in appropriate languages) the necessary information, instruction; training and supervision to protect each worker's health and to manage emergencies that might reasonably be expected to arise in the course of work. Training and supervision extends to the correct use of PPE (if appropriate to worker activities) and providing workers with appropriate incentives to use PPE.

Workers will receive OHS induction training when they commence work, and thereafter on a regular (at least annual) basis and when changes are made in the workplace. Training must cover the relevant aspects

of OHS associated with daily work, including the ability to stop work without retaliation in situations of imminent danger.

Induction training will be directed at ensuring all new workers are apprised of the basic site rules of work at / on the site and of personal protection and preventing injury to fellow employees. Training should consist of basic hazard awareness, site-specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate. A typical induction checklist is set out as follows.

Visitors to worksites must be provided with a site induction prior to entering and must be escorted at all times while on site. This induction must include details of site hazards, provision of necessary PPE and emergency procedures. Visitors should not be permitted access to areas where hazardous conditions or substances may be present, unless appropriately inducted.

Records of the training will be kept on file.

On the following page is a suggested format to be used for the project's induction checklist.

Workplace Induction Checklist

Organisation name:			
Employee name:		Position/job title:	
Employment start date:		Supervisor/manager:	

This workplace
 I have been shown/introduced to:

- My supervisor/manager
- Other employees
- Key jobs, tasks and responsibilities
- Work area, toilets, eating and drinking facilities
- Where to make phone calls and collect messages

Employment conditions
 I know about:

- Work times and meal breaks
- Rates of pay and how payment is made
- Leave entitlement
- Sick leave and who to call if I'm sick

Health and safety
 I have been shown:

- How to do my job safely, including the use of guards and other safety equipment
- The safety signs and what they mean
- How to safely use, store and maintain safety equipment
- How to safely use, store and maintain equipment, machinery, tools and hazardous substances

I know:

- My responsibilities as an employee
- Who my health and safety representatives are
- Where health and safety information is kept

Hazards
 I know:

- The hazards in my workplace
- The controls for these hazards
- How to report hazards
- Where records of hazards are kept
- The procedures for working safely
- I will receive the results of personal health monitoring

Emergencies
 I am familiar with:

- The location of the emergency exits
- The location of the fire extinguishers
- The evacuation procedure
- The first-aid kit and its location
- Who can provide first-aid (if applicable)

My assembly area is:
 My emergency wardens are:

Incidents and injuries
 I know:

- To report injuries, near hits and misses and early signs of discomfort and how to report them
- Where incident/injury forms are kept
- Who I report to
- Reports will be investigated and I will be informed of the results

Signed by worker:
 Signed by Manager:

Reporting Protections

Workplace processes will be provided by the Principal Contractor or employer for all Project workers to report work situations that they believe are not safe or healthy. Project workers can remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to their life or health. Project workers who remove themselves from such situations will not be required to return to work until necessary remedial action to correct the situation has been taken. Project workers will not be retaliated against or otherwise subject to reprisal or negative action for such reporting or removal.

General duty of workers

Each worker shall:

- Take all reasonable care to protect their own and fellow workers health and safety at the workplace and, as appropriate, other persons in the vicinity of the workplace;
- Use PPE and other safety equipment supplied as required;
- Not use PPE or other safety equipment for any purpose not directly related to the work for which it is provided; and
- Make supervisors aware of any injury occurring in the workplace.

Supervisors to ensure immediate response to injury and ensure injury is medically treated as necessary.

Personal Protective Equipment

Personal Protective Equipment (PPE) provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems.

Table B.3-1 below presents general examples of occupational hazards and types of PPE available for different purposes.

Table B.3-1: Priority Actions, responsibilities and timing

Objective	Workplace Hazards	Suggested PPE
Eye and face protection	Flying particles, molten metal, liquid chemicals, gases or vapours, light radiation.	Safety Glasses with side-shields, protective shades, etc.
Head protection	Falling objects, inadequate height clearance, and overhead power cords.	Plastic Helmets with top and side impact protection.
Hearing protection	Noise, ultra-sound.	Hearing protectors (ear plugs or earmuffs).
Foot protection	Falling or rolling objects, pointed objects. Corrosive or hot liquids.	Safety shoes and boots for protection against moving & falling objects, liquids and chemicals.
Hand protection	Hazardous materials, cuts or lacerations, vibrations, extreme temperatures.	Gloves made of rubber or synthetic materials (Neoprene), leather, steel, insulating materials, etc.
Heat / Sun protection	Extreme heat, or prolonged exposure to the sun	Wide brimmed hat, long sleeved short, long sleeved pants, etc
Respiratory protection	Dust, fogs, fumes, mists, gases, smokes, vapours.	Facemasks with appropriate filters for dust removal and air purification (chemicals, mists, vapors and gases). Single or multi- gas personal monitors, if available.
	Oxygen deficiency	Portable or supplied air (fixed lines). On-site rescue equipment.
Body/leg protection	Extreme temperatures, hazardous materials, biological agents, cutting and laceration.	Insulating clothing, body suits aprons etc. of appropriate materials.

Recommended measures for use of PPE in the workplace include:

- Active use of PPE if alternative technologies, work plans or procedures cannot eliminate, or sufficiently reduce, a hazard or exposure;
- Identification and provision of appropriate PPE that offers adequate protection to the worker, co-workers, and occasional visitors, without incurring unnecessary inconvenience to the individual;
- Proper maintenance of PPE, including cleaning when dirty and replacement when damaged or worn out. Proper use of PPE should be part of the recurrent training programs for Employees; and
- Selection of PPE should be based on the hazard and risk ranking described earlier in this section and selected according to criteria on performance and testing established.

Those persons responsible for site activities (employers, contractors) shall:

- Provide, maintain, and make accessible to workers the PPE necessary to avoid injury and damage to their health;
- Take all reasonably practicable steps to ensure that workers use that PPE in the circumstances for which it is provided; and
- Make provision at the workplace for PPE to be cleaned and securely stored without risk of damage when not required.

The application of prevention and control measures to occupational hazards should be based on comprehensive job safety analyses (JSA) or similar systematic approach. The results of these analyses should be prioritized as part of an action plan based on the likelihood and severity of the consequence of exposure to the identified hazards.

4 Monitoring

Occupational health and safety monitoring should be part of the OHS management and verify the effectiveness of prevention and control strategies. The selected indicators should be selected on the basis of screened OHS risks for each site, and should be representative of the most significant occupational, health, and safety hazards, and the implementation of prevention and control strategies.

Subject to the outcome of OHS screening, the OHS monitoring program should include:

Safety inspection, testing and calibration: This should include regular inspection and testing of all safety features and hazard control measures focusing on engineering and personal protective features, work procedures, places of work, installations, equipment, and tools used. The inspection should verify that issued PPE continues to provide adequate protection and is being worn as required.

Surveillance of the working environment: Employers should document compliance using an appropriate combination of portable and stationary sampling and monitoring instruments. Monitoring and analyses should be conducted according to internationally recognized methods and standards.

Surveillance of workers health: When extraordinary protective measures are required (for example, against hazardous compounds), workers should be provided appropriate and relevant health surveillance prior to first exposure, and at regular intervals thereafter.

Training: Training activities for employees and visitors should be adequately monitored and documented (curriculum, duration, and participants). Specific training, and/or certification (including evidence of certification) should be provided for certain tasks and activities (e.g., working at height, enclosed spaces etc) as required. Emergency exercises, including fire drills, should be documented adequately.

Accidents and Diseases monitoring: The employer should establish procedures and systems for reporting and recording:

- Occupational accidents and diseases.
- Dangerous occurrences and incidents.

These systems should enable workers to report immediately to their immediate supervisor any situation they believe presents a serious danger to life or health.

All reported occupational accidents, occupational diseases, dangerous occurrences, and incidents together with near misses should be investigated with the assistance of a person knowledgeable and competent in occupational safety. The investigation should:

- Establish what happened.
- Determine the cause of what happened.
- Identify measures necessary to prevent a recurrence.

Priority Actions

Priority actions, responsibilities and timing are outlined in Table B.3-2.

Table B.3-2: Priority Actions, responsibilities and timing

Target	Person Responsible	Timing
Initial screening of Project workplaces to indicate likely level of OHS Risk	CIU	Prior to works commencing
Develop OHS management procedures appropriate to scale of OHS risk at each workplace (and cleared by CIU pre-start); to include: <ul style="list-style-type: none"> ➤ identification, assessment and management of hazards (including JSA); ➤ training and supervision; ➤ reporting protections; ➤ general duties of employees; ➤ documentation; ➤ training and awareness; ➤ PPE; ➤ monitoring. 	Contractor (for Civil construction workplaces) OR Employer/PIU/CIU for other Project-related workplaces	Civil work places - Prior to construction OR (For other categories of workplaces) Prior to workers commencing work
Ensure all staff and contractors are aware of OHS Management procedures and are briefed on those procedures during induction.		

Worker-specific OHS Management

OHS Activity Classification

The management of OHS risk needs to be appropriate/proportionate for the scale of the risk. This means risks with potentially significant consequences (e.g., chronic ill-health, serious injury, death) may require more effort and resources to determine the most effective way to eliminate/minimise the risk.

The indicative risk associated with particular project workers will inform the level of detail required in particular OHS Management Plans.

Project workers fall into two broad categories – whether they are largely office-based or whether they are construction-based which includes use of machinery and plant.

Direct Workers

Direct workers comprise NDOE PIU staff and individual consultants engaged by NDOE PIU, and will largely be office-based, but will undertake site visits or field trips from time to time. NDOE PIU (with the support of CIU) will be required to develop OHS-related worker induction, hazard identification and risk management procedures around workplace hazards such as

1. Tripping
2. Falls
3. Ergonomics
4. Workplace bullying¹⁰
5. “Out of office” hazards such as
 - (i) Driving
 - (ii) Field work
 - (iii) Meetings
 - (iv) Travel in boats

¹⁰ Verbal, physical, social or psychological abuse by another person or group of people at work

(v) Working with aircraft

For office-based workplaces, a hazard checklist will be used (as detailed below)

All identified hazards are to be recorded on a hazard register which also sets out the significance of hazards and the practicable steps (elimination, isolation or minimization) taken to control them. An example Hazard Register is set out below.

Controls are to be monitored as required, and the CIU is to review the hazard register annually.

OFFICE HAZARD CHECKLIST		
Division:	Checked By:	
Business Unit:	Date:	
Location:		
Consider all the tasks required to produce an outcome from each office-based section of the organization.		
Job Design ➤ Has each job been designed to provide a variety of tasks throughout the day in terms of physical and mental workload? ➤ Are highly repetitive tasks (such as keying) performed for more than 2 hours at any one time? ➤ Are tasks that require a high level of concentration performed for more than 2 hours at any one time? ➤ Are employees trained to vary tasks and postures throughout the day? ➤ How are individuals given feedback regarding their work performance?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Comments
Lighting ➤ Is there sufficient lighting for the performance of tasks? ➤ Are employees able to control incoming natural light? e.g., close blinds ➤ Is artificial lighting causing reflections from work surfaces? ➤ Do employees have tired, sore or irritated eyes at the end of a day?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Comments
Noise ➤ Is noise a problem in the workplace? ➤ Is it difficult to hear a normal voice within 1 meter distance? ➤ Are there distracting or disruptive noises in the area? ➤ How well do screens or partitions control noise?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Comments
Manual Handling ➤ Are there objects that require pushing, pulling, lifting, lowering, carrying, holding or moving and do these actions require considerable physical effort or force to complete? ➤ Are there large, awkward or heavy objects to be handled? ➤ Are these objects handled more than once every 5 minutes? ➤ Is handling required more than 5 times per hour over a day? ➤ Is handling performed below mid-thigh height or above shoulder height?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<u>Comments</u>
Office Layout ➤ Is there sufficient space for tasks to be carried out? ➤ Is there sufficient space for the equipment and the operator? ➤ Is there sufficient space for light, intermediate and busy foot traffic? ➤ Is there sufficient circulation space around each workstation? ➤ Are there separate areas for tasks that require dedicated space? ➤ Is there a separate area for photocopying?	Check <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Comments

<p>Workstations</p> <ul style="list-style-type: none"> ➤ Is there sufficient space at the workstation for documents to be spread out within easy reach? ➤ Is there easy access to equipment such as telephone and keyboard? ➤ Is there adequate and safe height adjustability of work surfaces? ➤ Are workstations and equipment set up to reduce awkward postures? ➤ Are standing workstations suitable for a range of users? ➤ Is there sufficient desk width and depth for the tasks carried out? ➤ Are there provisions for sitting at this workstation where short period of continuous work are required? ➤ Are the chairs stable when sitting down and standing up? ➤ Are the chairs adjustable for different users? Are the visitors' chairs adequate for the number and type of visitors? ➤ Are the receptionist's chairs adjustable from the seated position? ➤ Are the reception chairs used by multiple operators? ➤ Do the keyboard operator chairs provide support and comfort to all individual operators? ➤ Are these chairs adjustable in height and backrest angle from seated? What degree of adjustability -- is it suitable? ➤ Is there a need for foot rests? ➤ Are document holders provided? ➤ Are staff trained to adjust their workstation furniture ? 	<p>Check</p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p>Comments</p>
<p>Storage</p> <ul style="list-style-type: none"> ➤ Is there sufficient general storage space for the office? ➤ Is there sufficient storage space at each workstation? ➤ Is storage space suitably designed to be within easy reach (that is, between shoulder and mid- thigh height)? ➤ Are steps available for reaching higher shelves? Is there sufficient space around storage areas to enable easy and safe access? 	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p>Comments</p>
<p>Visual Display Units</p> <ul style="list-style-type: none"> ➤ Is the computer screen size adequate for the task being performed? ➤ Is the force required to press the keys too high or too light? ➤ Is there adjustability for the screen brightness? ➤ Is there adjustability of the screen height? ➤ Is there a keyboard rest that frees up desk space for other tasks? 	<p>Check</p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p>Comments</p>
<p>Copying Equipment</p> <ul style="list-style-type: none"> ➤ Is there adequate copying equipment, in good working order, for the work required? ➤ Are copier lids intact and functioning to reduce exposure to intense light? ➤ Are self-contained toner cartridges supplied in a sealed state? ➤ Are procedures for the use and maintenance of copying equipment adequate, in place and in use? 	<p>Check</p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p>Comments</p>

<p>How frequently are safety procedures reviewed?</p>		
<p>Hazardous Substances</p> <ul style="list-style-type: none"> ➤ Is there concern regarding hazardous substances such as paint, glues and cleaning chemicals? ➤ Are there noticeable fumes in the air? ➤ Do any work processes use or generate dust, smoke, fumes or gases? ➤ Are there any hazards in the office known to be toxic, corrosive, flammable or explosive? 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>Comments</p>
<p>Housekeeping</p> <ul style="list-style-type: none"> ➤ Are the floors of all offices and passageways, corridors, storerooms or stairways:- <ul style="list-style-type: none"> • kept free from obstruction • properly maintained • covered with non-slip material • adequately illuminated? ➤ Does management ensure that all equipment is regularly serviced and maintained to manufacturers specifications? ➤ Has management developed a system for immediately fixing faulty equipment? ➤ Are all filing cabinets, cupboards, stable – for example, attached to the wall or floor to prevent them falling over? ➤ Are filing cabinets and cupboards located clear of doors, corridors and frequently used passages? ➤ Are sharp corners of furniture and other fittings situated so as to avoid a hazard to people passing them? 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>Comments</p>
<p>Electrical Connections</p> <ul style="list-style-type: none"> ➤ Is the use of power boards or extension cords minimized? ➤ Are electrical cords and connections inspected regularly? ➤ Are all electrical cords in as-new condition? ➤ Are all appliances in use suitable and in good condition 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>Comments</p>
<p>Workplace bullying</p> <ul style="list-style-type: none"> ➤ Are there any records of workplace bullying? ➤ Have measures been established to prevent or respond to workplace bullying? 	<input type="checkbox"/> <input type="checkbox"/>	<p>Comments</p>
<p>Out of office” hazards</p> <ul style="list-style-type: none"> ➤ Are any workers engaged in the following activities as part of project-related work? <ul style="list-style-type: none"> ▪ Driving ▪ Field work ▪ Meetings ▪ Travel in boats ▪ Working with aircraft ➤ If the answer to the above question is yes then have risk management plans for each sub-activity been prepared? 	<input type="checkbox"/> <input type="checkbox"/>	<p>Comments</p>

Direct Workers (Government)

Direct workers (Government) are generally will be subject to the same OHS procedures set out in this document in regard to project-related activities including site visits.

Contracted Workers

Direct workers (Government) are also generally will be subject to the same OHS procedures set out in this report in regard to project-related activities including site visits.

Consultant Firms

Consultants engaged to provide technical advisory services are generally office based and will be subject to the OHS procedures **OR** Consultant may provide and be subject to their own internal OHS plans if, and subject to approval by CIU, the internal plans cover those matters.

Civil Works Contractors**Contractor Bid Documentation**

OHS clauses from Appendix D of this LMP are to be incorporated in NDOE bid documents for all contracted works.

Principal Contractor OHS Management

The Principal Contractor will be subject to the OHS procedures set out in this report **OR** the Principal Contractor may provide and apply their own internal OHS plans if, subject to approval by CIU, the internal plans cover those matters.

Subcontractor OHS Management

Subcontractor OHS oversight will be the responsibility of the Principal Contractor.

The objectives of Sub-Contractor OHS Management are:

- A. To outline the relationship between the Contractors in the SEEP; and
- B. To outline the methods by which the Principal Contractor, will assure the production of quality deliverables from each of its subcontractors and primary suppliers and assure environmental, social and health and safety risk mitigation measures are implemented by all parties.
- C. The approach to Subcontractor OHS management is based on the following guiding principles which shall be included in contract documentation between the Principal Contractor and the Subcontractor:
 - D. Effective channels of communications clearly defined and established;
 - E. A Statement of Work relating to OHS management responsibilities will be developed jointly by the Principal Contractor with each Subcontractor;
 - F. OHS responsibilities will be consistent with Section of this report;
 - G. Each Subcontractor will have its OHS responsibilities clearly identified and described in the Statement of Work;
 - H. All OHS constraints imposed on the Subcontractor will be clearly identified in the Statement of Work;
 - I. Each subcontract will contain appropriate terms and conditions relating to OHS management;
 - J. Subcontractors will clearly identify persons responsible for OHS management in their organization;
 - K. Each sub-contractor organization will have a single point of contact with the Principal Contractor for OHS matters. Subcontractors are expected to identify their own single point of contact for OHS matters;
 - L. Each Subcontractor organization will have a single point of contact with the Principal Contractor for OHS matters. The Subcontractors are expected to identify their own single point of contact for OHS matters;
 - M. Where a significant risk of child labor or forced labor is identified in relation to Subcontractor's operations, the Subcontractor will be required to identify those risks, and shall set out steps to remedy those risks; and
 - N. The Principal Contractor must be kept aware of any OHS child labor or forced labor issues arising.

Training and awareness of all staff and contractors on the Project GM, Labor GM and relevant OHS Subcontractor management is to be undertaken by the Principal Contractor during induction and through the Project (e.g., weekly toolbox meetings) as necessary.

Job Safety Analysis (JSA)

Add Organisation Name:

Ref: Version:

Business details			
Business name:		Contact person:	
Address:		Contact position:	
Contact phone number		Contact email address:	
Job Safety Analysis details			
Work activity:		Location:	
Who are involved in the activity:		This job analysis has been authorized by: _____ Name: Position:..... Signature: Date:	
Plant and equipment used:			
Maintenance checks required:			
Tools used:			
Materials used:			
Personal protective equipment:			
Certificates, permits and/approvals required			
Relevant EHG Guideline, codes, standard MSDSs etc. applicable to this activity			

JSA – Action steps

Step No	Job step details	Potential hazards	Risk rating**	How to control risks***	Name of persons responsible for work

Code of Conduct

Applicability – This Code of Conduct applies to:

Direct Workers - NDOE PIU staff and individual consultants engaged by NDOE PIU;

and

Contracted Workers - consultant firms providing technical advisory services; and contractors engaged on civil works.

We are the Contractor/Employer, [enter name of Contractor/Employer]. We have signed a contract with NDOE for [enter description of the Works]. These Works will be carried out at [enter the Site and other locations where the Works will be carried out]. Our contract/employment conditions require us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation and abuse and gender-based violence.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, laborers and other employees at the Works Site or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as “Contractor/Employer’s Personnel” and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that we require from all Contractor/Employer’s Personnel.

Our workplace is an environment where unsafe, offensive, abusive or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

REQUIRED CONDUCT

Contractor/Employer’s Personnel shall:

- Carry out his/her duties competently and diligently;
- Comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor’s Personnel and any other person;
- maintain a safe working environment including by:
 - I. ensuring that workplaces, machinery, equipment and processes under each person’s control are safe and without risk to health;
 - II. wearing required personal protective equipment;
 - III. using appropriate measures relating to chemical, physical and biological substances and agents; and
 - IV. following applicable emergency operating procedures.
- Report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and danger to his/her life or health;
- Treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
- Not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature with other Contractor’s or Employer’s Personnel;
- Not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. In Bank financed projects/operations, sexual exploitation occurs when access to or benefit from Bank financed Goods, Works, Consulting or Non-consulting services is used to extract sexual gain;
- Not engage in Rape, which means physically forced or otherwise coerced penetration—even if slight—of the vagina, anus or mouth with a penis or other body part. It also includes

penetration of the vagina or anus with an object. Rape includes marital rape and anal rape/sodomy. The attempt to do so is known as attempted rape. Rape of a person by two or more perpetrators is known as gang rape;

- Not engage in Sexual Assault, which means any form of non-consensual sexual contact that does not result in or include penetration. Examples include: attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
- Complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and Sexual Exploitation, and Sexual Assault (SEA);
- Report violations of this Code of Conduct; and
- Not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the [Project Grievance [Redress] Mechanism].

RAISING CONCERNS

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly using the Project Grievance Redress Mechanism process.

The person’s identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by Contractor/Employer’s Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

FOR CONTRACTOR/EMPLOYER’S PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [*enter name of Contractor/Employer’s contact person with relevant experience in handling gender-based violence*] requesting an explanation.

Name of Contractor/Employer’s Personnel: [insert name]

Signature: _____

Date: (day month year): _____

Countersignature of authorized representative of the Contractor/Employer:

Signature: _____

Date: (day month year): _____

Civil Works Contractor – Occupational Health And Safety Clauses

General – Preparation of Contractor’s OHS Procedures

The Contractor must prepare OHS procedures, to be cleared by the client prior to works starting, which includes the following:

- Occupational Health and Safety Management procedures (refer to Appendix B of the SEEP LMP for details).
- Identification of staff responsible for, health and safety management, complaints management and reporting to the client.
- Risk register documenting the site-specific and project specific risks.
- Training plan and training records relating to OHS.

Community and Worker Health and Safety

Site-specific mitigation to be inserted in the bid documents:

- The Contractor shall at all times implement all reasonable precautions to prevent and reduce accidents and injuries to staff and workers and protect the health and safety of the community.
- The Contractor shall prepare and implement an OHS management procedures commensurate with the identified health and safety hazards at the construction site/s and it shall include activities related to construction (such as the transportation of materials and working in road easements).
- The Contractor shall at all times provide and maintain construction plant, equipment and systems of work that are safe and without risks to health. This shall include maintaining equipment, engines, and related electrical installations in good working order; maintaining a clean and tidy workspace; providing safe and exclusion barriers (e.g., guards and rails), signage, and lighting; providing work site rules, safe working procedures and allocating appropriate places to carry out the work.
- The Contractor shall provide, at his/her own expense, the protective clothing and safety equipment (Personal Protective Equipment - PPE) to all staff and labor engaged on the Works to the satisfaction of the PIU. Such clothing and equipment shall include, as a minimum:
 - High visibility vests for workers directing traffic;
 - Protective boots, gloves and hard hat for the workforce undertaking excavation works; and
 - Sun protection (e.g., hat, long sleeved shirt/pants etc).
- If the Contractor fails to provide such clothing and equipment, the PIU has the right to issue a stop work notice until the Contractor has provided the suitable equipment.
- The Contractor shall, before commencing work, conduct an induction course with all relevant workers on environmental management and safety and health at the site. The information and training shall be on the site and have duration of at least two hours.
- The Contractor shall adopt the following for workers working at height, in addition to FSM and state regulations:
 - The area around which elevated work is taking place should be barricaded to prevent unauthorized access. Working under other personnel should be avoided;
 - Hoisting and lifting equipment should be rated and maintained and operators trained in their use. Elevating platforms should be maintained and operated according to established safety procedures that include such aspects as equipment and use of fall protection measures (e.g., railings), movement of location only when the lift is in a retracted position, repair by qualified individuals, and the use of effective locks to avoid unauthorized use by untrained individuals;
 - Ladders should be used according to pre-established safety procedures including proper placement, climbing, standing, and the use of extensions, as outlined in the Contractors OHS procedures.

- Implementation of a fall protection program that includes training in climbing techniques and use of fall protection measures; inspection, maintenance, and replacement of fall protection equipment; and rescue of fall-arrested workers, among others; and
- Establishment of criteria for use of 100 percent fall protection (typically when working over 2 meters (m) above the working surface, but sometimes extended to 7 m, depending on the activity).
- The Contractor shall implement confined space entry management procedures where workers will be entering confined spaces (if required), which are to be outlined in the Contractors OHS procedures.

Worker Accommodation

- All workers shall be provided with safe and healthy accommodation, with potable drinking supply, running water, septic tank or reticulated wastewater collection and treatment, separate sleeping quarters (with separation of washrooms, bedrooms and toilets for men and women), and access to recreation areas / facilities. No new workers camps or worker accommodation facilities will be constructed (permanently or temporarily) for the workforce.

Worker Code of Conduct

- All workers shall be required to sign and adhere to a Code of Conduct CoC) prepared by the Contractor (refer **Error! Reference source not found.** of the SEEP LMP), relating to worker behavior to avoid harm to community members, including reference to Gender Based Violence (GBV), Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH).
- Training will be provided to outline appropriate behavior and implications for nonconformance and general awareness of SEA/SH, along with general awareness of the Grievance Mechanism (GM) for SEA/SH.