

# GOVERNMENT OF FIJI FIJI CONNECTIVITY PROJECT



World Bank: P159297

Environmental and Social Management  
Plan for Component 4 Activities

Version: 15th March 2021

## Table of Contents

|   |    |
|---|----|
| List of Figures .....                                   | 4  |
| List of Tables .....                                    | 4  |
| Abbreviations and Acronyms .....                        | 5  |
| 1. Introduction .....                                   | 6  |
| 2. Project Description.....                             | 6  |
| 2.1. New Project Component.....                         | 6  |
| 2.2. Summary of Key Activities .....                    | 7  |
| 2.3. Duration and Timing of Activities .....            | 9  |
| 2.4. Project Beneficiaries .....                        | 9  |
| 3. Policy, Legal and Administration Framework .....     | 10 |
| 3.1. Country Context.....                               | 10 |
| 3.1.1 Administrative Framework .....                    | 10 |
| 3.1.2 Legal Framework.....                              | 10 |
| 3.1.3 Relevant Strategies and Plans .....               | 11 |
| 3.1.4 Regional and International Agreements .....       | 11 |
| 3.2. World Bank Policies.....                           | 12 |
| 4. Current Environmental and Social Conditions .....    | 12 |
| 4.1. Socio-Economic Conditions.....                     | 12 |
| 4.2. Access to ICT Services .....                       | 13 |
| 4.3. Vulnerable Groups .....                            | 13 |
| 4.4. Gender Equality.....                               | 13 |
| 4.5. Solid Waste Management.....                        | 13 |
| 4.5.1 E-Waste .....                                     | 14 |
| 5. Summary of Environmental and Social Risks .....      | 15 |
| 6. Environmental and Social Management Plan.....        | 15 |
| 6.1. Performance Indicators .....                       | 15 |
| 6.2. Environmental and Social Mitigation Measures ..... | 16 |
| 7. Monitoring and Reporting .....                       | 25 |
| 7.1. Monitoring and Compliance .....                    | 25 |
| 7.2. Reporting.....                                     | 25 |
| 8. Consultation and Stakeholder Engagement .....        | 25 |
| 8.1. Project Stakeholders .....                         | 25 |

|       |   |    |
|-------|---|----|
| 8.1.1 | Affected Parties.....                                 | 26 |
| 8.1.2 | Other Interested Parties .....                        | 26 |
| 8.1.3 | Vulnerable Groups .....                               | 26 |
| 8.2.  | Consultation and Information Disclosure .....         | 27 |
| 8.2.1 | Stakeholder Engagement during Planning Stage.....     | 27 |
| 8.2.2 | Stakeholder Engagement during Implementation.....     | 27 |
| 9.    | Grievance Redress Mechanism.....                      | 27 |
| 10.   | Implementation Arrangements .....                     | 28 |
| 10.1. | Ministry of Communications.....                       | 28 |
| 10.2. | Department of Environment.....                        | 29 |
| 10.3. | Contractors .....                                     | 29 |
| 10.4. | World Bank.....                                       | 29 |
| 11.   | Capacity Development and Implementation Support ..... | 29 |
| 12.   | Annexes.....  | 31 |
|       | Annex A. Civil Works Inspection Checklist .....       | 31 |

List of Figures

Figure 1 – Example of a mounted external antenna ..... 8

Figure 2 – Example of a roof mounted satellite dish ..... 8

List of Tables

Table 1 - Environmental and Social Impact Mitigation Table - Planning Stage ..... 17

Table 2 – Environmental and Social Impact Mitigation Table - Construction Stage..... 19

Table 3 – Environmental and Social Impact Mitigation Table - Operational Stage ..... 24

Table 4 - Grievance Redress Process..... 28

## Abbreviations and Acronyms

|      |   |
|------|---|
| DOE  | Department of Environment                 |
| ESMP | Environmental and Social Management Plan  |
| GIIP | Good International Industry Practice      |
| GOF  | Government of Fiji                        |
| GRM  | Grievance Redress Mechanism               |
| ICT  | Information and Communications Technology |
| MOC  | Ministry of Communications                |
| MOE  | Ministry of Economy                       |
| MOH  | Ministry of Health                        |
| OHS  | Occupational Health and Safety            |
| PAI  | Project Area of Influence                 |
| PMU  | Project Management Unit                   |
| PPE  | Personal Protective Equipment             |
| SWM  | Solid Waste Management                    |
| WMP  | Waste Management Plan                     |

## 1. Introduction

The Fiji Connectivity Project (the Project) became effective in 2016. The Project is being implemented by Ministry of Communications (MOC) on behalf of the Government of Fiji (GOF). The objectives of the Project are to reduce the cost and increase the availability of internet services in the Northern Division of the Borrower's territory. There were three original components to the project, with the first component being the procurement and construction of a Submarine Cable System, the second component is the Regulatory Technical Assistance, and the third component is the Project Management and Administration. All original project activities have been completed, with significant savings achieved. The Ministry of Economy (MOE) requested the World Bank (WB) to reprogram the project savings to finance additional activities under a new component, which are to provide internet services to selected schools and health center facilities in the current project area as such, the Project is being restructured to include a new component (Component 4). Component 4 will also finance portable emergency communications solutions to parts of the Northern Division to enhance coordination during periods of adverse weather and during relief efforts.

The purpose of this Environmental and Social Management Plan (ESMP) is to define the procedures to manage the potential environmental and social impacts that may result from the activities under the new component. The objectives of the ESMP are to identify potential adverse environmental and social impacts that may be generated as a result of project activities, and define the methods the MOC will use to avoid, minimise, mitigate and, in such cases where there are residual impacts, offset adverse environmental and social impacts. The scope of this ESMP covers all activities that are proposed under the new Component 4.

## 2. Project Description

### 2.1. New Project Component

The new Component 4: Enhancing Connectivity to the Northern Division, will cost US\$1.63 million and consist of the following two subcomponents:

**Subcomponent 4.1: Internet services for schools and health centers.** This subcomponent is expected to cost US\$829,000 and will support the following activities:

- i. Needs assessment (US\$51,000);
- ii. Supply and installation of electricity (grid or generator) (US\$75,000);
- iii. Supply of Connectivity Equipment such as routers, antenna systems, modems, satellite kits and any other equipment that would facilitate internet connection (US\$109,000);
- iv. Supply of peripherals such as computers, webcams, headsets, printers, and any other equipment that will be used by the beneficiaries in accessing internet services at the schools or health centers (US\$197,000);
- v. Installation of connectivity equipment and peripherals (US\$56,000);
- vi. Provision of community WiFi hotspot solutions (US\$172,000);
- vii. Purchase of internet bandwidth (US\$169,000).

These services and equipment would be installed at existing Government and Community institutions in the Northern District, such as primary and secondary schools and health centers, to avoid capital construction costs. The students will be able to benefit from their school's improved connectivity during

school hours for their educational needs. Through this project, the GOF plans to roll out these services and this equipment and increase the accessibility of internet services to Fijians in the following locations:

- i) 16 unconnected schools (including primary and secondary): These high priority sites currently have no internet connectivity and minimal telecommunications service availability in the vicinity.
- ii) 12 poorly connected schools (including primary and secondary): These medium priority sites have some basic internet access. MOC will work with solution providers to enhance connectivity and install additional hardware to maximise accessibility to the local population.
- iii) 14 healthcare facilities: Priority will be given to healthcare facilities that are serving a large population and have minimal access to connectivity. Through the implementation of improved connectivity solutions in these sites, the facilities could also embark on piloting services such as e-health initiatives and improving their coordination and access to specialised medical advice through experts located in the larger urban hospitals.
- iv) Furthermore, MOC plans to install community accessible WiFi hotspots within the vicinity of the 42 locations indicated above to enable internet access for people who have their own WiFi capable devices and would not need to use the equipment in the school's computer laboratory. These WiFi hotspots would facilitate free continuous internet accessibility for the benefit of the local communities.

**Subcomponent 4.2. Provision of Portable Emergency Communications solutions.** This subcomponent is expected to cost US\$797,000 and will enable full connectivity and coverage across mountainous terrain and maritime areas in the Northern District to support emergency response efforts during times of natural disaster. These areas often suffer from loss of communications during periods of adverse weather, which severely impacts the ability of the authorities to disseminate weather warnings prior to natural disasters and coordinate relief efforts in their immediate aftermath. This subcomponent will support the procurement of a suitable communications solution that is robust enough to ensure communications in periods of bad weather and simple enough for ease of use by the local communities.

These portable solutions (likely satellite phone kits or similar technologies) would be stored centrally within the MOC and would be deployed as needed in areas being affected by the occurrence of natural disasters. The solutions are expected to considerably improve the GOF's capacity to respond to emergency situations in the Northern Division, reduce response times for completion of impact assessments, and facilitate faster coordination of relief efforts across isolated and marginalised communities. Having a portable solution will also ensure that the equipment is allocated to areas where there is a need, which in turn will promote an economical use of the resource.

## 2.2. Summary of Key Activities

Activities financed through Project restructuring will include the supply and installation of electricity (e.g. solar panels, mains, generators), the supply and installation of internet connectivity and other Information and Communications Technology (ICT) equipment such as computers, webcams, printers, routers, antenna systems, modems, satellite kits etc., as well as the procurement of portable emergency communications solutions for Fiji's Northern Division that has recently been impacted by Cyclone Yasa (December 2020) and Cyclone Ana (February 2021).

It is expected 42 sites will be deployed as part of this new activity and all sites are in the vicinity of the Northern Division. The actual sites have been confirmed after a detailed site survey was conducted by the MoC.

Electricity will be provided through existing mains, generators, or solar power supply. If solar energy is used, solar panels could be installed on rooftops. The exact source will depend on what site is selected for the rollout and what facilities are on the ground. In the event generators and solar panels are used, they should comply with the requirements of Department of Energy, which would be confirmed by MOC prior to installation.

An external antenna may be installed at sites where connectivity is weak. These also double as an external Wifi receivers, so an additional external outdoor router or Wifi access point is not necessary. Various models are available, but are normally 15cm x 15cm or 30cm x 30cm panels. An example is shown in Figure 1.

**Figure 1 – Example of a mounted external antenna<sup>1</sup>**



At very remote sites, a satellite receiver may need to be installed. This would normally be a 75cm dish, bolted onto the roof. Figure 2 shows an example of a roof mounted satellite dish. The type will depend on the vendor that is selected and this will be decided during implementation.

**Figure 2 – Example of a roof mounted satellite dish<sup>2</sup>**



<sup>1</sup> Source: <https://kenstechtips.com/index.php/mobile-broadband-antennas>, accessed 22<sup>nd</sup> February 2021

<sup>2</sup> Source: <https://kacific.com/services/home-internet>, accessed 22<sup>nd</sup> February 2021

The actual numbers of antenna and satellite receivers to be purchased and installed depends on the findings of the site inspection.

Other connectivity equipment includes Wifi access points, which can come in built with a router or can be a separate device. This would be similar to the router and access points commonly used in homes and offices. It is expected that 42 of these will be purchased for schools and health centers.

### 2.3. Duration and Timing of Activities

MOC's proposed implementation plan sees the completion of all planned activities by August 2021, before the project's current closing date of December 16, 2021. The site installations at the 42 schools/health centers were initially proposed to take place in the period 1<sup>st</sup> January 2020 – May 28<sup>th</sup> 2021. However, since restructure approval has been delayed, MOC expect to mobilise from mid-March and finish by June 2021. The target is three sites per week. The Emergency communications equipment will be deployed during the period May 3<sup>rd</sup>, 2021 – May 28<sup>th</sup> 2021. The target is one deployment per week with onsite training for users, with some buffer to allow for travel to the outer islands.

### 2.4. Project Beneficiaries

The major beneficiaries of the proposed activities are Fijians who reside in remote locations in the Northern Division and currently have either very poor or no telecommunications services as they are beyond the reach of existing fixed/mobile networks. Such areas are not commercially viable (given the high costs of overheads and low population density) and there are currently no plans by the local telecommunications service providers to expand services into these areas.

The GOF wishes to prioritise the delivery of services into these areas as part of its universal service programme to ensure all Fijians have access to basic ICT services, no matter where they are geographically located in the country, including the Northern Division, covered by the project. It is estimated that about 2,000 primary and secondary school students in the Northern Division would benefit directly from improved access to the internet, should it be extended to their schools. A further 3,000 Fijian youths in communities near these schools are also expected to utilise these facilities after hours. Improved connectivity in the health facilities located in the Northern Division, will also significantly improve the Ministry of Health's (MOH) ability to disseminate critical information relating to the COVID-19 pandemic, as well as its efforts to reduce non-communicable diseases in the community. Furthermore, it is expected that MOH will in due course venture into e-health initiatives to improve the quality of its healthcare provision to the local community, especially in the area of specialist healthcare advice.

It is estimated that a total of 24 villages around 8 localities in the broader Northern Division would benefit from improved emergency communications capabilities through the proposed deployment of a Portable Emergency Communications solution. These villages are currently in areas that are not serviced by telecommunications operators and as a result the communities are at significant risks during times of adverse weather. Once fully implemented, these activities are projected to improve connectivity to an additional 5,000 Fijians living in the immediate vicinity of the areas covered under the proposed expanded geographic scope.

### 3. Policy, Legal and Administration Framework

#### 3.1. Country Context

##### 3.1.1 Administrative Framework

The following key agencies have responsibilities with regard to the Project in Fiji:

- **The Department of Environment (DOE)** is primarily responsible for the implementation, monitoring and enforcement of the environment and waste management acts and regulations, and the development of policies on waste management. The DOE also manages Fiji's participation in international conventions on the environment.
- **The Department of Lands and Survey** is vested with authority to grant lease over State Land.
- **iTaukei Land Trust Board** administers leases on iTaukei land, on behalf of the custom land owners. The majority of land in Fiji is under customary land ownership by iTaukei.
- **The Ministry of Health** is involved in solid waste management through the Public Health Act 1935.
- **The Ministry of iTaukei Affairs** has a role in solid waste management whereby the Provincial Councils are given power to monitor solid waste management in villages.

##### 3.1.2 Legal Framework

The following key legislation have been assessed against the new project activities:

- **Environment Management Act 2005.** The Environment Management Act (Act) provides for an integrated system of development control, environmental assessment, and pollution control. Projects are assessed according to their scale and potential impacts under Part 1 of the Act. Section 3(2) states the purpose of the Act which is to 1) apply the principles of sustainable use and development of natural resources and 2) identify matters of national importance for Fiji. Part 4 requires that any proposed development activity that is likely to cause significant impact on the environment must undergo an environmental impact assessment (EIA) process. Schedule 2 details the development Proposals that are to be approved by the EIA Administrator. The following development proposals are to be approved by an approving authority- 1 (d) a proposal for civic or community development where a "civic or community development" means development for purposes of - (k) a radio or telecommunication installation. However, the activities proposed under the new component do not meet the definition of a 'development activity or undertaking' as defined by the Act as the activities will not alter the physical nature of the land in any way and therefore, an EIA is not required under Fijian law.
- **Environment Management (Waste Disposal and Recycling) Regulations 2007.** The Environment Management (Waste Disposal and Recycling) Regulations 2007 gives the Waste and Pollution Control Administrator power to issue permits for solid and liquid waste discharge and air discharges. The regulations include national air quality standards and criteria for the discharge of liquid and solid waste. Regulation 8(1) and (2) states:

*"8. – (1) A solid or liquid waste permit may relate to either construction or operation of a facility or any premises.*

*(2) A construction waste permit –*

*(a) relates to solid or liquid waste and pollutants generated during construction or demolition of premises of a facility; and*

*(b) lapses upon completion of the construction or demolition work”*

Project activities may generate very small amounts of solid waste, such as packaging waste and some e-waste. Given the minimal scope of works involved it is not expected that a construction solid waste permit will be required. However, MOC will confirm this with the DOE.

- **Health and Safety at Work Act 1996.** The Health and Safety at Work Act 1996 is the key legal instrument for safety and health at work. It is comprehensive, covering a wide range of key aspects of safe and healthy environment at work. The Act is supplemented by associated regulations on OHS administration, training, representatives and committees, general workplace conditions, a number of specific substantive provisions, and a Code of Practice on noise. All activities will be undertaken in compliance with this Act.
- **State Lands Act 1945.** The State Lands Act 1945 deals with State lands. All project activities will take place on existing State lands.

### 3.1.3 Relevant Strategies and Plans

- **National Solid Waste Management Strategy (2011-2014).** Fiji, like all other small developing states in the Pacific region, recognises waste management as a pressing issue that needs immediate action. It is recognised as a major concern with the potential to cause negative impacts on the national development activities including public health, the environment, food security, tourism and trade. To address the impacts, the National Solid Waste Management Strategy and Action Plan 2008 -2010 was formulated and in the years since the launching of the strategy, there has been some progress on improving solid waste. However, most solid waste is still currently being thrown in open dump sites, illegally disposed of in the sea, on unused land, or in the streets, and burned. The revised strategy, developed in consultation with stakeholders and approved by cabinet decision on 15th August, 2011 strives to address the environmental, health, and economic impacts of wastes over the period 2011- 2014 by building on the progress and successes achieved under the 2008 – 2010 strategy. It is supported by an implementation plan which sets out the key actions that will be taken to deliver the vision of the strategy. The vision of this National Solid Waste Management Strategy 2011 – 2014 is for Informed and Responsible Communities Committed to Sustainable Solid Waste Management.

### 3.1.4 Regional and International Agreements

Fiji is a party to the following relevant regional and international agreements:

- **Basel Convention.** The Basel Convention is an international treaty that was designed to reduce the movements of hazardous waste between nations, and specifically to prevent transfer of hazardous waste from developed to less developed countries (LDCs).
- **Natural Resources & Environment of South Pacific Region (1986) (SPREP or Noumea Convention).** This Convention is the major multilateral umbrella agreement in the Pacific Region for the protection of natural resources and the environment. This Convention was ratified by Fiji in 1989 and entered into force in 1990.
- **Pacific Regional Solid Waste Management Strategy 2010-2015.** Fiji was one of several Pacific island countries to adopt the Pacific Regional Solid Waste Management Strategy, initiated by SPREP, and adopted by member countries in 2009.
- **Waigani Convention on Hazardous Waste.** The 1995 Waigani Convention is a treaty that bans the exporting of hazardous or radioactive waste to Pacific Islands Forum countries and prohibits

Forum island countries from importing such waste. The convention has been ratified by Fiji and entered into force in 1996.

### 3.2. World Bank Policies

The Project was classified during preparation as Category B as there were no impacts identified that would be irreversible or unprecedented. The proposed restructuring activities have been assessed and will not change the Project Risk Classification. Relevant Bank policies triggered for the Project are OP 4.01 Environmental Assessment; OP 4.04 Natural Habitats; and OP 4.11 Physical and Cultural Resources. OP 4.10 Involuntary Resettlement is not triggered because all ICT installation works will be conducted on Government owned or leased land. No acquisition of private or iTaukei land is required and no assets or livelihoods will be affected.

The safeguard operational policies (OPs) that apply to Project activities are:

- **OP 4.01 Environmental Assessment** – This policy requires the conduct of an environmental assessment (EA) of projects proposed for Bank financing to help ensure that they are environmentally and socially sound and sustainable. This is the umbrella policy for the Bank's environmental and social safeguard policies. This ESMP has been developed to address the minor risks from the additional activities and they are expected to be easily managed and reversible.
- **OP 4.04 Natural Habitats** – This policy aims to support the protection, maintenance and rehabilitation of natural habitats and promotes the conservation of natural habitats for long-term sustainable development through a precautionary approach. There will be no disturbance associated with the additional activities and as such there is no further impact on this policy.
- **OP 4.11 – Physical and Cultural Resources.** This policy addresses physical cultural resources, which are defined as movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. There will be no disturbance associated with the additional activities and as such there is no further impact on this policy and no chance finds procedure is required.

Detailed information on Bank safeguard policies are available at:

<https://projects.worldbank.org/en/projects-operations/environmental-and-social-policies>

## 4. Current Environmental and Social Conditions

### 4.1. Socio-Economic Conditions

Fiji is comprised of about 332 islands (one-third of which are inhabited) in the South Pacific Ocean about two-thirds of the way from Hawaii to New Zealand. Of the total population of about 885,000 people distributed over a total area of 18,273km<sup>2</sup>, about 80 percent live in the Central and Western Divisions of Fiji on the island of Viti Levu, and 15 percent in the Northern Division (Vanua Levu and Taveuni). Currently about 50 percent of Fijians live in rural areas. Poverty is higher in rural areas, at 44 percent, compared to 26 percent in urban areas, and larger households tend to have a higher incidence of poverty, particularly in rural locations. The Northern Division has the highest rates of poverty (48 percent) according to the most recent Household Income and Expenditure Survey. The Northern

Division was also among the areas hardest hit by Cyclone Winston (February/March 2016) and was recently impacted by Cyclone Yasa (December 2020) and Cyclone Ana (February 2021).

#### 4.2. Access to ICT Services

Fiji is one of the more developed and connected countries in the Pacific region with the highest rates of mobile phone and internet penetration, and the most affordable ICT services. Fiji has the potential to leverage these technologies to diversify its economy and transform public service delivery, to reduce internal inequalities and also to become a regional hub for ICT-enabled jobs and services. Furthermore, for there to continue to be more equitable access to economic and social development opportunities in other parts of country. The new regional submarine optical fiber cable connecting Fiji (Suva on Viti Levu) to Samoa presents an unprecedented opportunity to deliver high-speed low-cost internet connectivity, and associated economic and social benefits to the Northern Division (Vanua Levu and Taveuni islands) the country's poorest and least developed area. The activities being proposed through the new subcomponent will further expand access to connectivity throughout the Northern Division.

#### 4.3. Vulnerable Groups

Fiji has one of the lowest rates of extreme poverty and inequality in the Pacific. In 2018, Fiji was ranked 98 out of 189 countries on the UNDP Human Development Index, putting it in the High Human Development category. In 2013, just 1.4% of people in Fiji lived in extreme poverty, or under the US\$1.90 per day (2011 purchasing power parity) poverty line. Inequality in Fiji is also among the lowest in the East Asia and Pacific region: the Gini Index, a measure of inequality, stood at 36.4 in 2013. However, the incidence of poverty in Fiji at 48.6% remains higher than that of most other upper middle-income countries and the Northern Division has the country's highest rates of poverty.

#### 4.4. Gender Equality

Gender differences are strongly embedded in Fijian culture and tradition. Occupational discrimination and gender segregation in education and the labour market are persistent challenges. The roles of women are impacted by ethnicity and vary in degree at the household level, but male-dominated hierarchies tend to be common regardless of ethnicity. Women's share of employment is significantly lower than that of men, and there is a gender wage gap. According to the 2017 census, the labour force participation rate for women was 37.4% compared to 76.4% for men, and the unemployment rate for women was 7.8% compared to 2.9% for men. Women's involvement in political, social and economic activities is promoted through many international and regional gender equality commitments by the government. Women's civil society organisations have been instrumental in getting policies and laws in place for women's rights and gender justice in Fiji. In February 2014, the Government approved the National Gender Policy, which seeks to promote gender equity and equality by removing all forms of gender discrimination and inequalities to attain sustainable development. More widespread and affordable access to ICT services can facilitate improved economic opportunities for women, and provide valuable access to information and services.

#### 4.5. Solid Waste Management

Waste legislation, strategies, resources and facilities, etc. are generally available and implemented in Fiji. There are 12 urban sanitary districts (two city and 10 town councils) and 16 rural sanitary districts in Fiji. Under the Local Government Act 1972, city and town councils are responsible for the management of solid waste. Health Inspectors, who report to the Ministry of Health, are given powers under the

Public Health Act to monitor the disposal of garbage. The DOE is responsible for ensuring that waste management Acts and Regulations, and the development of policies on waste management are in place to safeguard the environment<sup>3</sup>.

Fiji is particularly concerned with solid waste management (SWM) as it has the potential to cause negative impacts on the fragile environment, tourism, trade, food supplies, public health and severely place constraint on the existing limited resources<sup>4</sup>. However, most solid waste is still currently being thrown in open dumpsites, illegally disposed of in the sea, on unused land, or in the streets<sup>5</sup>. In parts of Fiji, illegal dumping and burning of waste are still common due to inadequate enforcement<sup>6</sup>. Finding suitable new landfill sites is often quite difficult due to land issues like customary rights over the use of land and reluctance by landowners to lease land for use as disposal sites due to fear of negative environmental, social and economic impacts<sup>7</sup>.

However, despite these challenges Fiji, Suva City in particular, has achieved important improvements in SWM in recent years. Many other areas are still serviced by uncontrolled dumpsites which pollute air, water, and land. There have been on-going discussions and trainings with provincial councils and local authorities on implementing low-cost solid waste dump improvements, with a focus on moving towards environmentally sound operations and meeting the requirements under the Environment Management (Waste Disposal and Recycling) Regulations 2007. A key issue is the need to improve the efficiency of waste transportation and disposal, perhaps through developing a system of strategically located transfer stations such that waste is bulked-up for transporting to centralised waste disposal facilities, thereby reducing the unit cost for transport<sup>8</sup>.

#### 4.5.1 E-Waste

E-waste is categorised as a hazardous waste, as it contains hazardous substances like lead, cadmium and mercury. Incorrect disposal of e-waste can cause serious damage to the environment (air, water, soil) and to public health. There are no specific guidelines for collection, treatment, and disposal of waste from electrical and electronic equipment in Fiji and there is no recycler putting any real effort into E-waste collection<sup>9</sup>. Suva City Council conducts a special collection drive for e-waste twice a year under its “Keep Suva Clean Campaign”<sup>10</sup>. The Naboro Sanitary Landfill in Suva has separate cells for receiving hazardous wastes, such as e-waste, so that this waste is segregated from general waste being delivered. However, currently most e-wastes such as computers, televisions, and office equipment are taken to landfills, or dumps for disposal.<sup>11</sup>

<sup>3</sup> GOF (2011). *Fiji National Solid Waste Management Strategy (2011-2014)*.

<sup>4</sup> Kumar, P. (2013). *Country Analysis Paper – Fiji. 3Rs in the Context of Rio+20 Outcomes – The Future We Want*” Ha Noi, Viet Nam, 18-20 March 2013.

<sup>5</sup> GOF (2011). *Fiji National Solid Waste Management Strategy (2011-2014)*

<sup>6</sup> ADB (2014). *Solid Waste Management in the Pacific: Fiji Country Snapshot*.

<sup>7</sup> Kumar, P. (2013). *Country Analysis Paper – Fiji. 3Rs in the Context of Rio+20 Outcomes – The Future We Want*” Ha Noi, Viet Nam, 18-20 March 2013.

<sup>8</sup> GOF (2011). *Fiji National Solid Waste Management Strategy (2011-2014)*

<sup>9</sup> SPREP (2014). *E-waste Generation and Recycling, and the Potential for Interventions by PacWaste: Palau, The Marshall Islands, Vanuatu, The Solomon Islands and Fiji*

<sup>10</sup> ADB (2014). *Solid Waste Management in the Pacific: Fiji Country Snapshot*.

<sup>11</sup> GOF (2011). *Fiji National Solid Waste Management Strategy 2011-2014*.

## 5. Summary of Environmental and Social Risks

The restructuring did not change the Project Risk Classification which was originally classified as Category B. There will be no large scale, significant and/or irreversible impacts associated with the additional activities financed by the Project under the restructuring. No additional civil works will be completed, with the exception of the installation of satellite receptors, and possibly solar panels on rooftops. As such, there will be no additional land disturbed; and the MOC will ensure that all ICT equipment is installed on existing building infrastructures only, where Government already has land tenure and access rights.

Potential minor environmental and social risks associated with the additional activities include:

- i) Health and safety associated with rooftop installations to both the installers and the staff working in and around the building on which the installation is taking place;
- ii) Land access, noting that installation of cables, wiring, and potentially rooftop satellite receptors and solar panels will be undertaken on buildings within existing government owned or leased land;
- iii) Waste disposal from minor volumes of waste generated through equipment installation e.g. packaging waste and the generation of small volumes e-waste at the end of asset life; and
- iv) Inclusive access to ICT services and equipment for all members of the targeted beneficiaries, including vulnerable or marginalised groups or individuals.

This ESMP has been developed to address these minor risks and they are expected to be easily managed and reversible. These potential environmental and social impacts are assessed and the mitigations to be implemented are outlined in Chapter 6.

## 6. Environmental and Social Management Plan

### 6.1. Performance Indicators

Nearly all of the potential negative environmental and social impacts would occur during the construction period and environmental and social contract clauses will be used to mitigate and avoid impacts. Therefore, the key performance indicators will be as follows:

- i) Confirmation that the ESMP tasks are defined as specific individual or grouped environmental and social clauses in the contract bid documents.
- ii) Confirmation that environmental management criteria is included as part of the contractor selection process, including their experience implementing ESMP(s).
- iii) The appointed advisor in the PMU with safeguards responsibility, with support from the DOE, providing assistance with ESMP implementation.
- iv) A written record of the briefing on safeguards with the contractor(s).
- v) Civil Works inspection checklist (Annex A) being used by the contractor(s) and PMU safeguards representative.
- vi) Records of any health and safety incident's or near misses.
- vii) A written mitigation and monitoring completion report, listing all mitigation and monitoring measures as defined in the ESMP, their implementation timing, monitoring, and any follow up actions.

The PMU advisor with safeguards responsibility (Safeguards Advisor) will be responsible for preparing a performance indicator report on behalf of the PMU, by listing the seven items above and providing a short explanation of how these items were implemented and their success

## 6.2. Environmental and Social Mitigation Measures

The following tables detail the mitigation measures and monitoring actions that the MOC will implement, during the planning, construction/installation and operational stages of component 4 activities.

**Table 1 - Environmental and Social Impact Mitigation Table - Planning Stage**

| Potential Environmental and Social Impact  | Proposed Mitigation Measures   | Parameter to be Monitored / Verified  | Timing / Duration of Monitoring   | Implementation Responsibility                | Oversight                           |
|--|--|---|---|--|-------------------------------------|
| <b>Installation activities requires temporary and/or permanent land acquisition.</b>   | Installations will only occur on land that is confirmed to be government owned or leased.  | Verification of ownership or formal lease arrangement.  | During the site inspection and before any physical works begin. Once.         | PMU Safeguards Advisor                       | World Bank E&S Risk Management Team |
| <b>Access to ICT services and equipment is not inclusive for all members of the targeted beneficiaries, including vulnerable or marginalised groups or individuals e.g. women, children, elderly, and users with disabilities.</b> | <ul style="list-style-type: none"> <li>• Designs consider the differentiated access needs of vulnerable and/or marginalised groups or individuals.</li> <li>• Undertake at least one community consultation with affected communities, prior to the commencement of any physical works.</li> <li>• Grievance Redress Mechanism (GRM) developed and in place prior to commencement of installation works.</li> </ul>  | <ul style="list-style-type: none"> <li>• PMU safeguards advisor reviews the detailed designs.</li> <li>• Consultation records.</li> <li>• Confirmation that GRM is available and disclosed on the MOC website.</li> </ul> | During the detailed planning stage and before any physical works begin. Once. | PMU Safeguards Advisor                       | World Bank E&S Risk Management Team |
| <b>Land and/or water pollution from inappropriate disposal of minor volumes of e-waste.</b>  | <p>E-Waste disposal will be done in accordance to the standing policy of the Government ITC Department. If not included in the policy, the PMU Safeguards Advisor shall develop a brief e-waste management plan (e-WMP) that incorporates the principles of the Waste Management Hierarchy (Reduce, Reuse, Recycle, Residual Disposal) so that MOC have defined options for e-waste disposal, prior to installing the new hardware.</p> <p>The WMP should include the following as a minimum:</p> <ul style="list-style-type: none"> <li>• Consider not replacing existing electronics wherever practicable e.g. upgrading existing hardware.</li> </ul> | <p>e-WMP developed and implemented.</p> <p>Development of an e-waste tracking system.</p>   | During the detailed planning stage and before any physical works begin. Once. | PMU Safeguards Advisor with support from DOE | World Bank E&S Risk Management Team |

| Potential Environmental and Social Impact | Proposed Mitigation Measures  | Parameter to be Monitored / Verified | Timing / Duration of Monitoring | Implementation Responsibility | Oversight |
|---|---|--------------------------------------|---------------------------------|-------------------------------|-----------|
|   | <ul style="list-style-type: none"> <li>Consider purchasing equipment that can be upgraded and/or repaired.</li> <li>Consider the length of product life, warranty and availability of repair services when purchasing equipment.</li> <li>Consider opportunities for others to reuse the unwanted equipment e.g. schools or community groups.</li> <li>Return equipment to suppliers for reuse or recycling if this is practicable.</li> <li>Investigate e-waste recycling opportunities in Fiji.</li> <li>E-waste from outer islands should be collected and transported to the Naboro Sanitary Landfill in Suva for collection and safe disposal.</li> <li>Collection, transport, and disposal of e-waste shall be to licenced/permitted hazardous waste sites only, following GIIP.</li> <li>E-waste transported out of country for recycling or disposal at a licenced and engineered landfill, only with appropriate permits and approvals under international treaties such as the Waigani and Basel Conventions.</li> </ul> <p>The exact amount of e-waste generated will likely be small. However, MOC should develop a simple waste tracking system for e-waste to measure the amount and type of e-waste produced and disposed of, to ensure that the amounts and types are correctly tracked and recorded. The e-waste tracking system should be developed during the planning stage and incorporated into the e-WMP for use by project beneficiaries.</p> |                                      |                                 |                               |           |

**Table 2 – Environmental and Social Impact Mitigation Table - Installation Stage**

| Potential Environmental and Social Impact   | Proposed Mitigation Measures   | Parameter to be Monitored / Verified   | Timing / Duration of Monitoring                    | Implementation Responsibility | Oversight                                    |
|---|--|--|--|-------------------------------|--|
| <b>Occupational Health and Safety (OHS) risks for workers installing equipment onto rooftops.</b> | <p>The contractor(s) undertaking works shall implement an appropriate OHS policy that complies with all national regulations and good international industry practice (GIIP) regarding workers' safety, such as the Working at Heights section of the <a href="#">WBG EHS Guideline 2.0 - Occupational Health and Safety</a>, and implement the following at a minimum:</p> <ul style="list-style-type: none"> <li>• Complete different levels of risk assessment, i.e. from whole Job Safety Analysis down to the personal level, to identify any potential hazards, rank the risks, and identify ways to eliminate, control or minimize the hazards;</li> <li>• Develop and follow a brief health and safety (H&amp;S) management plan that is compliant with national regulations and <a href="#">WBG EHSGs</a> and submit the plan to the PMU Safeguard Advisor for approval prior to any physical works commencing;</li> <li>• Appoint a health and safety officer at each site, who will have the authority to issue directives for the purpose of maintaining the health and safety of all personnel authorized to enter and/or work on the site;</li> <li>• Prepare and implement a simple action plan to cope during an emergency (e.g., fire, storm surge, cyclone, COVID-19 outbreak or injury/fatality);</li> <li>• Have or receive the minimum required training on occupational safety regulations and use of PPE;</li> <li>• Take protective measures to prevent accidents such as implementing good house-keeping practices e.g. sorting and placing loose materials, electrical cords, ropes etc. in established areas and away from foot paths.</li> <li>• Use temporary fall prevention devices, such as rails or other barriers able to support a weight of 200</li> </ul> | Contractor(s) Health and Safety management plan; fall hazard zone signage; fall prevention measures; PPE, complaints register; accident/incidents register; completed Civil Works Inspection Checklists. | Weekly inspections throughout construction period. | Contractor(s)                 | PMU Safeguards Advisor with support from DOE |

| Potential Environmental and Social Impact | Proposed Mitigation Measures  | Parameter to be Monitored / Verified | Timing / Duration of Monitoring | Implementation Responsibility | Oversight |
|---|---|--------------------------------------|---------------------------------|-------------------------------|-----------|
|   | <p>pounds (90 kgs), when working at heights equal to or greater than two meters. Fall prevention may include:</p> <ul style="list-style-type: none"> <li>○ Installation of guardrails with mid-rails and toe boards at the edge of any fall hazard area;</li> <li>○ Proper use of ladders and scaffolds by trained employees;</li> <li>○ Use of fall prevention devices, including safety belt and lanyard travel limiting devices to prevent access to fall hazard area, or fall protection devices such as full body harnesses used in conjunction with shock absorbing lanyards or self-retracting inertial fall arrest devices attached to fixed anchor point or horizontal life-lines. Operators must be trained in the use of fall prevention heights and have a spotter monitoring their work in case of emergency;</li> <li>○ Appropriate training in use, serviceability, and integrity of the necessary PPE;</li> <li>○ Inclusion of rescue and/or recovery plans, and equipment to respond to workers after an arrested fall; and</li> <li>○ Use of control zones (hard barriers) and safety monitoring systems to warn workers of their proximity to fall hazard zones.</li> </ul> <ul style="list-style-type: none"> <li>● Provide appropriate PPE and other safety measures during works such as safety glasses with side shields, face shields, hard hats, hi-vis vests and safety shoes with non-slip soles, first aid kits, fall hazard warning signs, overhead protection against falling debris;</li> <li>● Refer any grievances received by the community, school, health-care facility and/or local businesses to the PMU Safeguards Advisor; and</li> <li>● Provide project workers with accessible means to raise workplace concerns.</li> </ul> |                                      |                                 |                               |           |

| Potential Environmental and Social Impact  | Proposed Mitigation Measures   | Parameter to be Monitored / Verified   | Timing / Duration of Monitoring                    | Implementation Responsibility | Oversight                                    |
|--|--|--|--|-------------------------------|--|
| <b>Health and safety risks for healthcare workers, patients, and their relatives at healthcare facilities, and teachers and students at schools.</b> | <p>The contractor(s) undertaking works shall implement an appropriate OHS policy that complies with all national regulations and GIIP regarding community health and safety, such as the General <a href="#">WBG EHS Guidelines</a>, and implement the following at a minimum:</p> <ul style="list-style-type: none"> <li>• Develop and follow a health and safety (H&amp;S) management plan that is compliant with national regulations and <a href="#">WBG EHSGs</a> and submit the plan to the PMU Safeguard Advisor for approval prior to any physical works commencing;</li> <li>• Take protective measures to prevent accidents such as: <ul style="list-style-type: none"> <li>○ Install barriers (caution tape, temporary fencing etc.) to prevent unauthorised access to worksites.</li> <li>○ Implementing good house-keeping practices to eliminate the hazard where possible, such as the sorting and placing loose construction materials and electrical cords in established areas away from foot paths.</li> <li>○ Planning and segregating the location of walking areas and fall hazards zones.</li> </ul> </li> <li>• Provide safe access routes and other safety measures as appropriate during works such first aid kits, restricted access zones, warning signs, overhead protection against falling debris and barricaded exclusion areas for drop zones (e.g. when working at heights;</li> <li>• Communicate risks and community safety mitigation measures to facility staff; and</li> <li>• Grievance Redress Mechanism (GRM) in place prior to commencement of installation works.</li> </ul> | Contractor(s) Health and Safety plan; fall hazard zone signage; fall prevention measures; consultation records; complaints register; accident/incidents register; completed Civil Works Inspection Checklists. | Weekly inspections throughout construction period. | Contractor(s)                 | PMU Safeguards Advisor with support from DOE |
| <b>Land and/or water pollution from</b>  | The contractor(s) undertaking works shall implement the following at a minimum:  | Contractor(s) WMP; sanitation facilities   | Weekly inspections                                 | Contractor(s)                 | PMU Safeguards                               |

| Potential Environmental and Social Impact  | Proposed Mitigation Measures   | Parameter to be Monitored / Verified  | Timing / Duration of Monitoring | Implementation Responsibility | Oversight                     |
|--|--|---|---------------------------------|-------------------------------|-------------------------------|
| <b>inappropriate disposal of minor volumes of solid waste generated through equipment installation e.g. packaging materials.</b> | <ul style="list-style-type: none"> <li>Develop and follow a brief site-specific waste management plan (WMP) (separation of waste streams, storage, provision of bins, site clean-up, bin clean-out schedule, etc.) and submit it to the PMU Safeguard Advisor for approval prior to any physical works commencing;</li> <li>The WMP must include the principles of the Waste Management Hierarchy (Reduce, Reuse, Recycle, Residual Disposal). The following methods for waste reduction and recycling should be utilized: <ul style="list-style-type: none"> <li>Minimise waste production by storing waste in neat piles to avoid cross contamination and placing clear signage on all waste separation and collection areas;</li> <li>Recyclable materials such as packaging material etc., shall be segregated on-site from other waste sources for reuse or recycling;</li> <li>On-site and off-site transportation of waste should be conducted to prevent or minimize spills, releases, and exposures to employees and the public.</li> </ul> </li> <li>Use litter bins, containers and waste collection facilities at all places during physical works;</li> <li>Store solid waste temporarily on site in a designated place prior to off-site transportation and disposal through a licenced/approved waste collector;</li> <li>On-site and off-site transportation of waste should be conducted to prevent or minimize spills, releases, and exposures to employees and the public;</li> <li>Dispose of waste only at designated place identified and approved by local authority. Open burning or burial of solid waste on the site shall not be allowed. It is prohibited for the contractor(s) to dispose of any debris or construction material/paint in environmentally sensitive areas (including</li> </ul> | maintained onsite; waste and recycling records; worker training records; completed Civil Works Inspection Checklists. | throughout construction period. |                               | Advisor with support from DOE |

| Potential Environmental and Social Impact | Proposed Mitigation Measures   | Parameter to be Monitored / Verified | Timing / Duration of Monitoring | Implementation Responsibility | Oversight |
|---|--|--------------------------------------|---------------------------------|-------------------------------|-----------|
|   | <p>watercourses);</p> <ul style="list-style-type: none"> <li>• Provide access to adequate sanitation facilities serving all workers at all construction sites and ensure onsite worker sanitation facilities are properly operated and maintained to collect and dispose of wastewater;</li> <li>• Minimise hazardous waste generation by ensuring hazardous waste is not co-mingled with non-hazardous waste. Collect, transport and disposal of hazardous waste to licenced/permitted hazardous waste sites only following GIIP for the waste being handled; and</li> <li>• Design training for staff in the segregation of wastes.</li> </ul> |                                      |                                 |                               |           |

**Table 3 – Environmental and Social Impact Mitigation Table - Operational Stage**

| Potential Environmental and Social Impact   | Proposed Mitigation Measures  | Parameter to be Monitored / Verified | Timing / Duration of Monitoring                                  | Implementation on Responsibility | Oversight              |
|---|---|--------------------------------------|--|----------------------------------|------------------------|
| <b>Land and/or water pollution from inappropriate disposal of minor volumes of e-waste.</b> | <p>E-Waste disposal will be done in accordance with the standing policy of the Government ITC Department and the e-waste management plan (WMP).</p> <p>E-waste recycling and disposal to be recorded using the e-waste tracking system.</p> | Waste and recycling records.         | Waste and recycling records - throughout project implementation. | Beneficiaries                    | PMU Safeguards Advisor |

## 7. Monitoring and Reporting

### 7.1. Monitoring and Compliance

The planning stage of the ESMP will be followed by the MOC PMU and compliance monitored by the World Bank E&S Risk Management Team.

The installation stages of the ESMP will be followed by the contractor(s) and compliance monitored by the PMU Safeguards Advisor with support from the DOE.

The operational stage of the ESMP will be followed by the project beneficiaries and compliance monitored by the MOC PMU.

### 7.2. Reporting

Six-monthly reports will be prepared by the MoC throughout the project and submitted to the World Bank for review. The semi-annual environmental and social monitoring reports to the World Bank will include: (i) the status of the implementation of mitigation measures; (ii) the findings of monitoring programs; (iii) consultation activities; (iv) grievances log; and (v) any incidents/accidents with adverse impacts and the actions taken to address it and prevent reoccurrence. Serious or severe incidents will be reported to the World Bank within 24 hours.

During the construction stage, monthly reports shall be prepared by the contractor(s) and submitted to the MoC for review. The reports will include information on: (i) the implementation of contractor(s) Health and Safety and Waste Management Plan(s); (ii) any health and safety or environmental incidents reported; and (iii) information on any grievances received and how they were resolved.

## 8. Consultation and Stakeholder Engagement

The participation of the local population is essential to ensure collaboration between Project staff, contractors, and local communities and to minimize and mitigate environmental and social risks related to the proposed Project activities.

The stakeholder engagement activities cover how information will be shared with targeted beneficiaries (ICT users), including marginalized or vulnerable people and outlines consultation activities and inputs from stakeholders in the process of ESMP implementation.

Stakeholder engagement will continue throughout the life of the Project and will include formal scheduled consultations and meetings as well other means of communication.

The stakeholder engagement process has two key components:

- Early and ongoing engagements with key stakeholders at national, sub national and community level to provide information on the Project and obtain feedback on experiences and outcomes of the Project and its activities.
- A GRM to address any public complaints during the implementation of the Project.

### 8.1. Project Stakeholders

To ensure effective and targeted engagement, the Project identifies three core stakeholder categories: affected parties; other interested parties; and vulnerable groups.

### 8.1.1 Affected Parties

Affected Parties comprise persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the Project and/or have been identified as most susceptible to change associated with the Project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

The following are considered affected parties in the context of this Project:

- Workers at sites where equipment is being installed e.g. school staff and health care workers.
- Youths and caregivers of youths in the schools where equipment is being installed
- Neighboring communities to primary and secondary schools and health centers
- Staff at the Office of the Commissioner Northern
- Department of the Environment
- Ministry of Health
- Other public authorities

### 8.1.2 Other Interested Parties

Other interested parties include individuals, groups and other entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the Project and/or who could affect the Project and its implementation in some way. Other interested parties may include:

- ICT and social media users
- Politicians
- Town councils
- Local businesses
- Local and international non-governmental organisations (NGOs)
- Communities in the immediate vicinity of the schools and health center facilities

### 8.1.3 Vulnerable Groups

Vulnerable groups are identified as any persons or groups who may be disproportionately impacted or further disadvantaged by the project activities due to their vulnerable status, and who may require special engagement efforts to ensure their equal representation in consultation and decision-making processes. The Project will conduct targeted engagement with vulnerable groups to ensure they are fully informed of the Project and to understand their concerns and needs in accessing information and project services and other challenges they face at home, at workplaces and in their communities.

Vulnerable or disadvantaged groups may include and are not limited to the following:

- Women
- Youth
- People with disabilities
- Elderly
- Illiterate people

Vulnerable groups within the communities affected by project activities will be further confirmed and consulted through dedicated means, as appropriate.

## 8.2. Consultation and Information Disclosure

### 8.2.1 Stakeholder Engagement during Planning Stage

Discussions with key stakeholders will be held on the draft ESMP to seek views and inputs from stakeholders before finalising the ESMP. A brief stakeholder engagement plan will be prepared by the PMU to provide a framework for how and when to have these discussions.

Adequate records of the consultation process will be kept, including what feedback was received and how this feedback was included in the ESMP. The final ESMP will be disclosed on the MOC website.

### 8.2.2 Stakeholder Engagement during Implementation

Once the detailed site inspections have been undertaken and project sites identified, initial public consultation meetings with affected communities will be undertaken to present and discuss the findings of the site inspections and discuss the proposed mitigation measures in the ESMP, including the availability of the GRM. These meetings will take place prior to any physical works commencing.

Stakeholder engagement methods may include the following:

- One-on-one meetings with school and health care center staff and with construction contractors
- One-on-one meetings with community leaders and representatives
- Community and small group meetings where these are safe and culturally appropriate
- Separate meetings or focus group discussions with vulnerable groups, such as women, youth and people living with disabilities, to ensure that they have their voices heard
- Dissemination of materials (posters, leaflets, brochures) with project information
- Press releases (for key events and major announcements)
- Social media updates
- Website

In order to maximise local turnout, the meetings will be advertised on local radio and print media, as well as through dissemination through local villagers.

Consultations to be communicated in the vernacular and disclosed locally to ensure that there is widespread understanding of the project, its objectives and timeline.

Adequate records of the consultation process will be kept, including list of attendees, issues raised and how those issues were addressed.

Stakeholders will be kept informed as the Project develops, including reporting on environmental and social performance and implementation of the grievance redress mechanism through traditional media, pamphlets or flyers, and online platforms.

## 9. Grievance Redress Mechanism

A GRM will be available for community members in the event that they wish to lodge a grievance or complaint regarding project activities.

The GRM is scaled to the risks and adverse impacts of Project activities. If promptly addressed, and using an understandable and transparent process that is gender responsive, culturally appropriate, and at no costs and without retribution, the concerns and complaints of potentially affected people are expected to quickly resolved.

The GRM does not impede access to regular judicial process, but simply provides a simpler access to complaint resolution. The PMU will inform community members about the GRM before commencement of any physical

works. This will be done as part of consultation session with affected communities. The GRM will also be available on the MOC website.

The following six-step mechanism is proposed for grievance redress of social and environmental matters (Table 4).

**Table 4 - Grievance Redress Process**

| Step  | Process   | Duration                |
|---|---|-------------------------|
| 1   | Affected Person (AP) takes grievance to PMU Safeguards Advisor or Contractor.   | Any time                |
| 2   | PMU Safeguards Advisor or contractor reviews issue, and in consultation with village matai or traditional chief, relevant agencies and contractor (if appropriate), agrees to a solution and records the results. | 2 weeks                 |
| 3   | PMU Safeguards Advisor reports back to AP and gets clearance the complaint has been resolved.   | 1 week                  |
| <b><i>If issue is unresolved</i></b>  |   |                         |
| 4   | PMU Safeguards Advisor take grievance to MOC Project Manager or DOE Officer for resolution.   | Decision within 2 weeks |
| 5   | If not resolved MOC Project Manager or DOE Officer must take matter to MOC Permanent Secretary for decision.  | 2 weeks                 |
| 6   | Permanent Secretary can deliberate for ≤ four weeks and resolve the case.   | 4 weeks                 |
| <b><i>If unresolved or if at any stage and AP is not satisfied with process, the AP can take the matter to the judiciary.</i></b> |   |                         |

During implementation, the PMU Safeguards Advisor will be responsible for managing the GRM and will be the grievance focal point, to receive and address project related concerns. Concerns will be resolved first by the PMU Safeguards Advisor and contractor(s). Affected people will be made fully aware of their rights. During the construction stage the contractor(s) will be a key participant in the grievance redress process, and the PMU Safeguards Advisor will need to confirm that the contractor has assigned a GRM coordinator. The World Bank E&S risk management team can support this process and provide any guidance / advice as required.

Any complaint will be recorded and investigated by the PMU Safeguards Advisor and the contractor (as appropriate). A complaints register will be maintained, and will show the details and nature of the complaint, the complainant's name<sup>12</sup>, the date and actions taken as a result of the investigation. The register will also cross-reference any non-compliance report and/or corrective action report or other relevant documentation filed in relation to the original complaint.

When construction starts, a sign will be erected at all sites providing the public with updated project information and summarising the grievance redress mechanism process including contact person details at the PMU. All corrective actions and complaint responses carried out on site will be reported back to the PMU. The PMU will include the complaints register and reporting on corrective actions/responses in its semi-annual progress reports to the World Bank.

## 10. Implementation Arrangements

### 10.1. Ministry of Communications

MOC is the implementing authority for the Project and has overall responsibility for the day-to-day management and implementation of the Project. MOC has the mandate within the GOF to increase accessibility to ICT services to all Fijians, including those that reside in rural and maritime areas (which includes the targeted areas in the

<sup>12</sup> Complaint may also be submitted anonymously

Northern Division). Furthermore, MOC is also responsible for looking after the whole-of-government communications network, which includes the MOH facilities. The MOC will take leadership of works contracting and management.

### **Project Management Unit**

The Project Management Unit (PMU) within the MOC provides project management services on behalf of the MOC and has overall responsibility to ensure safeguard compliance. MOC does not have in-house safeguards expertise but, through the implementation of the original project activities, has experience working with the World Bank Safeguards Policies. The PMU will appoint an advisor who will be responsible for overseeing the safeguards compliance of the additional sub-component activities and will also secure assistance from an officer of the DOE to implement the ESMP and advise and assist with environment and social risk management.

#### **10.2. Department of Environment**

The DOE will provide support to the PMU to implement the ESMP and will advise and assist with environment and social risk management and compliance with local laws. There will be a representative of the DOE on the Project Working Group, who will advise the PMU Safeguards Advisor on safeguard matters.

#### **10.3. Contractors**

Construction contractor(s) will be used for installation activities. Contractor(s) will be required to comply with the ESMP and local laws and this will be specified in the contractor(s) agreements. Contractor(s) will be expected to disseminate and create awareness within their workforce of environmental and social risk management compliance, and undertake any staff training necessary for their effective implementation. Where contractors do not have existing environmental staff, the PMU Safeguard Advisor, supported by the World Bank Environmental and Social team, will make arrangements for adequate capacity building within the contractor(s) workforce.

Contractor(s) will also be required to prepare and comply with WMP(s) and health and safety plan(s) in compliance with the ESMP and local legislation, and submit those plans to the PMU Safeguard Advisor for approval, prior to the commencement of physical activities and to take all necessary precautions to maintain the health and safety of their staff. The contractor(s) will appoint a health and safety officer at site, who will have the authority to issue directives for the purpose of maintaining the health and safety of all personnel authorized to enter and or work on the site, to take protective measures to prevent accidents, to ensure suitable arrangements are made for all necessary welfare and hygiene requirements, to undertake worker training, and be a focal point to deal with COVID-19 issues. Contractors will be briefed on the GRM and are required to refer any grievances to the PMU Safeguards Advisor who will coordinate the GRM.

#### **10.4. World Bank**

The World Bank's Environmental and Social team will provide regular E&S risk management due diligence and support for the duration of the Project, remote and during missions, and to build capacity for implementation of the ESMP. As international travel may be slow to resume, supervision and missions may continue to be conducted remotely for some time.

### **11. Capacity Development and Implementation Support**

Through the implementation of the original project activities the MOC has experience working with the World Bank Safeguards Policies. The PMU will continue to oversee the additional sub-component activities and will be supported by an officer of the DOE to implement the ESMP.

The PMU may need ongoing support, training, and technical assistance to implement the ESMP. It is expected that enhanced oversight from the World Bank E&S risk management team will be required. Support will include:

(a) capacity building for PMU Staff staff on WB implementation and requirements; (b) an implementation support mission every six months, once international travel has resumed; (c) interim technical discussions and site visits by the WB team; (d) monitoring and reporting by the implementation team on implementation progress and achievement of results; (e) annual internal and external financial audits and FM reporting; and (f) periodic procurement post review. In the event of the inability of relevant staff to travel to Fiji to undertake implementation support, the use of audio/video conferencing, as has been the case during Project preparation, will continue in order to ensure “just in time” support to the MOC. The WB will maintain a close dialogue with the PMU and ensure implementation support for environmental and social risk management and consultations when needed. Further capacity assessments during project implementation will identify where training and further capacity building will be needed.

## 12. Annexes

### Annex A. Civil Works Inspection Checklist

# Fiji Connectivity Project

## Civil Works Inspection Checklist

Site Name: \_\_\_\_\_

Location: \_\_\_\_\_

General Description of Site: \_\_\_\_\_

Screening Date: \_\_\_\_\_

Person Completing Form: \_\_\_\_\_

### WASTE MANAGEMENT

Person in-charge of waste management onsite:

\_\_\_\_\_

1. Is there a separate and tidy waste storage area?  
☐ Yes  
☐ No – set this up immediately.
2. Are separate bins with clear signage available?  
☐ Yes  
☐ No – set this up immediately.
3. Have all workers been inducted to the waste system?  
☐ Yes  
☐ No – include waste management in tool box talks.
4. Is there any evidence of open burning / burial of waste?  
☐ Yes – stop work and report to MOH Health inspector.  
☐ No
5. Is waste collected by a licenced/approved collector?  
☐ Yes - Name: \_\_\_\_\_  
☐ No – only use licenced/approved waste collector.
6. Where is the waste being disposed of off-site?  
\_\_\_\_\_
7. Is the facility licensed / approved by the local authority?  
☐ Yes  
☐ No – only licensed facilities can be used.

### OCCUPATIONAL HEALTH AND SAFETY

Person in-charge of health and safety onsite:

\_\_\_\_\_

8. Do all workers have appropriate PPE (hard hats etc.)?  
☐ Yes  
☐ No – stop work until equipment is available.
9. Are workers trained on the appropriate use of PPE?  
☐ Yes  
☐ No – include this in tool box talks.
10. Is the site tidy and free of trip hazards?  
☐ Yes  
☐ No – clean up the site immediately. ***If workers are working at heights  $\geq 2m$ , complete Q's 13-19.***
13. Are workers trained on appropriate use ladders, scaffolds etc.?  
☐ Yes  
☐ No – include this in tool box talks.
14. Are temporary fall prevention devices in place?  
☐ Yes  
☐ No – stop work and put devices in place.
15. Are safety belts / lanyards available and being used?  
☐ Yes  
☐ No – stop work and put devices are available.

16. Is fall hazard warning signage visible?

- ☐ Yes
- ☐ No – stop work and put signage in place.

17. Are fall rescue plans in place?

- ☐ Yes
- ☐ No – stop work and develop rescue plan.

18. Is there a spotter for working with fall protection?

- ☐ Yes
- ☐ No — stop work until spotter is available.

19. Are there hard barriers demarcating any drop zones?

- ☐ Yes
- ☐ No — stop work and mark drop zones .

#### **COMMUNITY HEALTH AND SAFETY**

20. Are there barriers, fences, warning signs, etc. being used to prevent unauthorized access to the site?

- ☐ Yes
- ☐ No – stop work until in place.

21. Are walking areas located away from fall hazards zones?

- ☐ Yes
- ☐ No – stop work and relocate walking areas.

22. Is the GRM advertised on-site?

- ☐ Yes
- ☐ No – erect sign/poster with GRM details.

23. Has a GRM coordinator been assigned?

- ☐ Yes
- ☐ No – immediately assign a GRM coordinator.