
Kiribati Digital Government Project

Preliminary Environmental and Social Management Plan

Ministry of Information, Communications, Transport and Tourism Development

FINAL

23 November 2021

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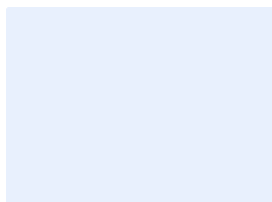
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Declaration of accuracy:

The undersigned declare that the information provided herein is true and accurate and provides a complete description and assessment of the activity.

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Executive Summary

The Kiribati Digital Government Project's development objective is to build the foundations and strengthen the Government of Kiribati's technical and institutional capacity for digital public service delivery. The proposed Project will support key focus areas outlined in Kiribati's Digital Government Master Plan (2021), notably on governance, technical infrastructure for digital government, and e-Government applications. The project will:

- support the development and strengthening of a Digital Transformation Office (DTO) for sustainable digital government coordination and implementation;
- provide upstream enabling legal, regulatory, institutional support and capacity-building necessary for the foundations for digital government and digital economy in Kiribati;
- finance infrastructure for e-government including a National Data Centre (NDC);
- support the development of Digital National ID and Civil Registration systems, and the linkage between the two; and
- support the development of a national government portal to facilitate citizen and business access to public information, interactions and transactions with Government ministries and agencies.

This Preliminary Environmental and Social Management Plan (ESMP) assesses the environmental and social risks associated with the Project activities (as they are understood at appraisal) in accordance with the World Bank's Environmental and Social Framework and the relevant Environmental and Social Standards (ESS) therein. Environmental and social screening identified the following ESS's as relevant:

- ESS1 Assessment and Management of Environmental and Social Risks and Impacts
- ESS2 Labour and Working Conditions
- ESS3 Resource Efficiency and Pollution Prevention and Management
- ESS4 Community Health and Safety
- ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS10 Stakeholder Engagement and Information Disclosure

The ESMP will be finalised during project implementation on completion of design and prior to commencement of the procurement process for civil works.

Environmental and Social Risks and Management

The Preliminary ESMP identified the following key environmental and social risks which are summarised together with the proposed mitigation measures:

- Labour and Working Conditions – All workers will be employed in accordance with provisions in the Labour Management Procedures (LMP). There is a low OHS risk associated with the construction of the NDC and this will be managed by requiring the contractor to prepare a Safety Management Plan and

monitoring of implementation. The Project is expected to result in some redundancies of Registry Clerks in various Government agencies. The redundancy process will be undertaken in accordance with the *Employment and Industrial Relations Code 2015* and consistent with *IFC Good Practice Note: Managing Retrenchment*.

- Resource Efficiency and Pollution Prevention and Management – the NDC construction (if the Bairiki location is chosen) will require small quantities of aggregate **for the concrete foundation** which will be sourced from the existing Government-approved ESAT project (Atinimarawa company). Potential air, noise and water pollution from construction will be managed with good international industry practices. E-waste generated under the project will be managed under the existing national waste processing system and exported for recycling.
- Community Health and Safety – the CHS risk is low and associated with NDC construction activities. This will be managed by preventing access to the construction site and ensuring workers adhere to the LMP. Issues related to cyber crime, SEA/SH and harmful digital content will be managed under Government legislation.
- Land Acquisition and Involuntary Resettlement – the Project design will avoid any involuntary resettlement by siting the NDC on land leased by the Government through a voluntarily negotiated agreement. Due diligence will be conducted to ensure that the agreement is voluntary, will not cause physical or economic displacement, and will not negatively impact vulnerable groups.
- Stakeholder Engagement and Information Disclosure – these requirements will be undertaken in accordance with the Stakeholder Engagement Plan (SEP) included as Annexure B.

The institutional arrangements will build on the implementation arrangements of the ongoing Kiribati Connectivity Project (P159632), by using the same Project Management Unit (PMU) and involving the same implementing agencies. Environment and social risk management will be supported by the Kiribati Fiduciary Services Unit (KFSU), which is a central unit previously established to provide support to World Bank-funded projects.

1 Introduction

1.1 Project Context

Kiribati is one of the world's most remote and geographically dispersed nations. The country consists of 33 coral atolls spread over approximately 3.5 million square kilometres of ocean with up to 3,700 km between the farthest islands in three main island groups: The Line Islands, Phoenix Islands and Gilbert Islands. Kiribati has a limited economic base dominated by the sale of fishing licenses, remittances, aid flow, and investment income from its sovereign wealth fund—the Revenue Equalization Reserve Fund. In common with other small island atoll states, it faces obstacles posed by remoteness, lack of scale, and vulnerability to external shocks and environmental stress. Severe infrastructure deficits in utilities, transport and communications compound the constraints imposed by distance and dispersion.

Government recognizes the importance of digital government and is undertaking to lay out the foundations for this in Kiribati. While still at an early stage, digital transformation is a high and urgent priority in Kiribati. The government recognizes ICT as a vital part of the country's development in its 20-year vision for Kiribati (KV20), the Government Manifesto, and National ICT Policy (2019), and is committed to transforming the delivery of public services and using digital solutions to enhance good governance.

Kiribati has made significant progress over the past decade to create market conditions and rollout new infrastructure necessary to support the digital economy. The Communications Act passed in 2013 and its subsequent amendment in 2016 established a framework for liberalizing the ICT sector and enabling an open competitive market. The Act established the Communications Commission of Kiribati (CCK) as the sector regulator.

International connectivity and access to high-speed Internet are however still limited, constraining the ability of individuals and businesses to unlock the full potential of a digital economy. International connectivity is still a challenge, with currently only satellite communications available. National capacity as of November 2020 was more than 1,200Mbps – up from 100 Mbps (80/20) in 2016. The deployment of the proposed EMCS submarine cable is currently pending decisions by the governments of Kiribati, Nauru, and the Federated States of Micronesia (FSM).

On broadband infrastructure, with the support of the ongoing IDA-financed Kiribati Connectivity Project (P159632), the government is undertaking a submarine cable system to connect Kiribati (South Tarawa), Nauru and the Federated States of Micronesia/FSM (Kosrae-Pohnpei) with onward connectivity from Pohnpei to Guam (US) via the HANTRU-1 cable, as part of the East Micronesia Cable system (EMCS).

The proposed Project will support key focus areas outlined in Kiribati's Digital Government Master Plan (DGMP), notably on necessary Governance, Technical Infrastructure for digital government, and e-Government Applications.

The Project's implementing agency is the Ministry of Information, Communications, Transport and Tourism Development (MICTTD) with other stakeholders including the Communications Commission of Kiribati (CCK), the Ministry of Justice (MOJ) and the state-owned cable operator (BNL). The Project Borrower is the Ministry of Finance and Economic Development (MFED).

1.2 Environmental and Social Management Plan

The World Bank Environmental and Social Framework (ESF) requires an environmental and social assessment (ESA) of the project to assess the environmental and social risks and impacts of the project throughout the

project life cycle. The assessment must be proportionate to the potential risks and impacts of the project and address all relevant direct, indirect and cumulative environmental and social risks and impacts throughout the project life cycle. The ESA is required to address the requirements of the Environmental and Social Standards (ESSs) to achieve environmental and social outcomes consistent with those described in the ESF.

This document comprises a Preliminary Environmental and Social Management Plan (ESMP) that assesses the Project's environmental and social risks, provides an analysis of Project impacts and identifies appropriate mitigation measures, including who is responsible for implementation. The methodology for preparing this ESMP included desk review based on secondary information, findings and experience from the previous Kiribati Digital project, and consultations with government and civil society stakeholders. The Preliminary ESMP incorporates a Stakeholder Engagement Plan (SEP) which outlines how the Project will ensure affected and interested parties will receive information and be consulted throughout the life of the Project. An Environmental and Social Commitment Plan (ESCP) is referenced in the legal agreement between the Bank and the Borrower and defines key actions and responsibilities for environmental and social management during project implementation.

Initial environmental and social risk screening indicates the Project has a moderate environmental and social risk rating.

It is the responsibility of the Project Management Unit (PMU) to ensure that this ESMP is fully integrated throughout implementation. The ESMP shall form part of any bid documentation, TOR or partnership agreement for physical works, and it shall be the PMU's responsibility to ensure that all procurement documents, partnership agreements and contractual specifications is subject to review against this ESMP and the January 2017 version of the World Bank standard procurement documents to ensure that all relevant safeguard measures are captured at the bid stage and in all contracts.

The ESMP is to be publicly disclosed by the Ministry of Information, Communications, Transport and Tourism Development (MICTTD), Ministry of Finance (MOF) and the Communications Commission of Kiribati (CCK) as the agencies responsible for project implementation. A public flyer radio advertisement and/or Facebook post on MOF and CCK Facebook pages will alert the public to the disclosure of the instruments. Likewise, MICTTD will ensure that several copies of all prepared E&S risk management instruments are available locally at the ICT office and easily accessible to affected groups and local Non-Governmental Organizations (NGOs).

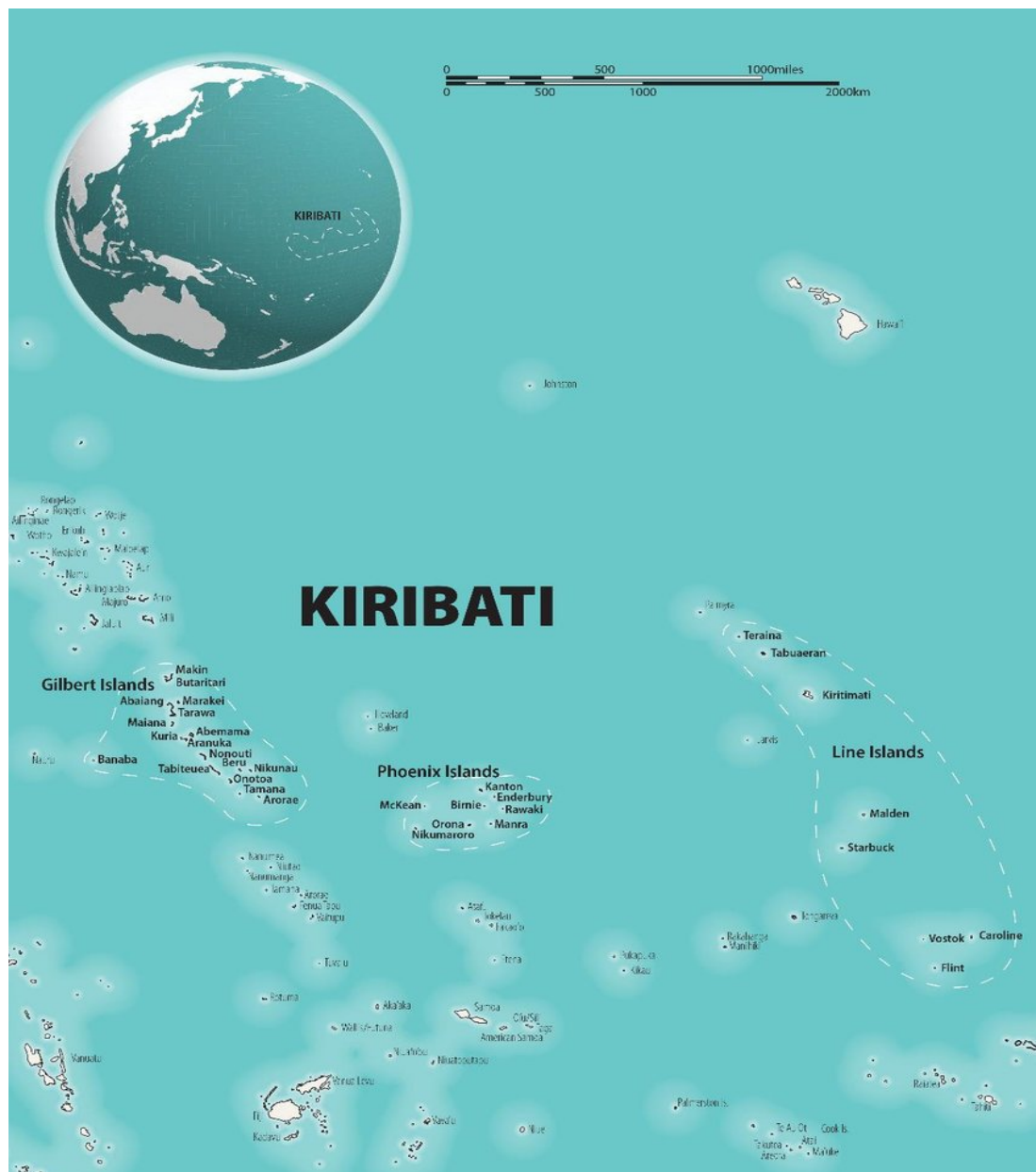
The ESMP is preliminary as detailed design works have not yet been completed, and will be reviewed, finalised and re-approved by the Government of Kiribati and World Bank during project implementation on completion of design works and prior to the commencement of the bidding process for any physical works. For each approved updated version of this ESMP, the PMU will be responsible for disclosure through the above channels. Specific activities required prior to finalising the ESMP (and SEP and LMP as relevant) include:

- siting decision/concept design for the National Data Centre (NDC);
- confirmation and documentation of land tenure (for whichever NDC option is chosen);
- formation and resourcing of Project Implementation Unit (PMU);

All above activities will be undertaken within the timeframes specified in the Environmental and Social Commitment Plan (ESCP).

2 Activity location

Project implementation through the Digital Government Master Plan (DGMP) will aim to provide digital government services to the entire Kiribati population across the three island groups - Gilbert Islands, Phoenix Islands and Line Islands – shown on Figure 2.1.



Source:

https://www.researchgate.net/publication/343629763_Coping_with_environmental_hazards_and_shocks_in_Kiribati_Experiences_of_climate_change_by_atoll_communities_in_the_Equatorial_Pacific

Figure 2.1 Map of Kiribati

Physical works under the Project will involve the installation of a National Data Centre which will be sited on South Tarawa either in Nanikai Village (co-located with the submarine cable landing station) or in Bairiki Village, the administrative capital of South Tarawa as shown on Figure 2.2. The final location will be determined during Project implementation.



Source: https://commons.wikimedia.org/wiki/File:06_Map_of_South_Tarawa,_Kiribati.jpg

Figure 2.2 **Map of South Tarawa**

3 Baseline environmental and social context

3.1 Environmental Baseline

The Republic of Kiribati is one of the smallest, most remote and geographically dispersed countries in the world. The country consists of 32 low lying coral islands and one raised coral island in three main island groups namely the Line Islands, Phoenix Islands and Gilbert Islands.

Most islands are no more than two metres above mean sea level and only a few hundred metres wide. As such, they are at the forefront of climate change. The capital, South Tarawa, is about 4,000 km from the major trade markets of Australia and New Zealand. The population of about 119,940 (2020 census, preliminary results) is growing at a long-term rate of 1.5 percent per annum. The capital, South Tarawa, is the most populated island with approximately 63,439 people, and is about 4,000 kilometers from the major trade markets of Australia and New Zealand. The populations of Kiribati's outer islands vary from around 330 (Banaba) to 7,380 (Kiritimati Islands and North Tarawa), with about 45 percent of the country's population living in rural areas.

3.1.1 Climate

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

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

Kiribati lies just outside the main tropical cyclone belt in Southwest Pacific. Tropical cyclones hit about once per year, and rarely pass within 400km of Kiribati. Three cyclones passed within 400 km of both Arorae Island (west) and Caroline Island (east) between 1969/70 and 2009/10. Whilst all of the project islands are located outside the major cyclone path and of low to moderate cyclone risk, the Gilbert Islands are considered to be vulnerable to other important extremes including extreme sea levels and storm surges associated with an increase in the incidence of cyclones and extreme storm events. There is a greater increase in losses projected for more extreme events. However, it should also be noted though that there is considerable variation in cyclone and storm hazard patterns across the archipelago and even between islands in the same atoll, due to local variation in geophysical and climatic factors. Coastal inundation is a constant concern on low-lying islands in Kiribati.

3.1.2 Waste Management

As a small atoll island, Kiribati, and in particular South Tarawa, is facing waste management problems due to its limited resources, shortage of land and an increase in urbanisation. However, there has been significant progress in strengthening overall management of solid waste in South Tarawa since 2011 as a result of support provided by New Zealand under the Urban Development Program. Comprehensive assistance has been provided for a range of activities including public awareness, waste collection and disposal, and recycling infrastructure and services. Three landfills on South Tarawa were rehabilitated and new infrastructure (fencing, site offices and compacting rollers) provided. In recent years, some of wastes, including aluminium cans and polyethylene terephthalate (PET) bottles, have been almost entirely eliminated from the waste stream due to the introduction of successful recycling initiatives. However, other wastes, such as diapers and electronic waste, are becoming a growing problem

While many issues related to solid waste management are being streamlined, some issues remain that need immediate attention, and have been identified as priorities by stakeholders such as greater efficiency in waste collection services, and ensuring that South Tarawa's landfill facilities are properly operated and maintained in line with management plans which have been developed with development partner assistance. As South Tarawa is already one of the most densely populated areas in the world, unmanaged urbanisation will have a major impact on waste management systems in this area. Poor waste management also has implications for general health and wellbeing and is a contributor to major public health problems, particularly with regards to infants and children.

Overall legal, policy, and planning for solid waste management is a national government responsibility. MELAD and its ECD is responsible for enforcing the Environment Act 1999. Implementation and enforcement of the Act and Regulations are faced with hurdles. These hurdles arise from typical situation of least developed nations: lack of financial, technological and personnel resources.

The responsibility for managing waste collection and disposal in landfills lies with the local government councils within their respective areas of authority. Telnainano Urban Council (TUC) is responsible for the part of South Tarawa from Tanaea town in the east to Bairiki; and Betio Town Council (BTC) is responsible for waste collection on Betio islet, which is linked to Bairiki by a causeway.

All wastes collected by the councils and private operators are directly disposed at landfill sites. TUC operates the landfills at Nanikai and Bikenibeu, while BTC operates the Betio landfill. In 2004, the Sanitation and Public Health and Environment Improvement Project (SAPHE), supported by the ADB, financed the construction of landfills at Nanikai and Bikenibeu, and repaired an existing landfill in Betio. The landfills have subsequently been rehabilitated and upgraded under the Urban Development Program. Other smaller dumpsites also exist, but these are illegal under the Environment Act.

E-Waste. As is the case with many other countries across the world, Kiribati has an increasing proliferation of electronic and electrical goods (such as computers, mobile phones, iPad, printers, and photocopiers). Increasing use of such technology, high obsolescence due to limited repair capabilities and the need for newer models has resulted in an increased accumulation of e-waste. E-waste is categorized as hazardous waste, as it also contains hazardous substances like lead, cadmium and mercury. Incorrect disposal of e-waste can cause serious damage to the environment and to public health.

Phase 1 of a MFAT sponsored Kiribati Solid Waste Management (SWM) programme provided some funding for the management of e-waste through the identification of a storage facility for e-waste in South Tarawa, the organisation of a process for retrieving e-waste in consultation with councils, and the establishment of an

ongoing schedule that covers these objectives. This project commenced in 2011 and work on E-waste started in mid-2012. MFAT agreed to provide support on E-waste until 2015. The project collected e-waste at the Tarawa MRF and expected to make a single TEU shipment by the end of 2014. Infrastructure was built which comprises three shipping containers on fixed foundations under a permanent roof, and this allows sufficient space to receive, process for dismantling, pack and store E-waste for future shipment. Project management is under the Kiribati ECD. However, the SWM programme is only providing limited support for e-waste during Phase 2, apart from general coordination support via the funded Waste Minimisation Officer. The reason is that MFAT considered that the Secretariat of the Pacific Regional Environment Programme (SPREP) was likely to continue to provide funding support in this area through the Pacwaste project. The MFAT mid-term evaluation team were informed that full container load of e-scrap has been filled and was waiting to be exported. However, money is needed for export. The SPREP funded Pacwaste project was finalised in March 2018 without exporting the materials that had been collected and stored.

The main sources of e-waste come from the major consumers such as Government agencies, institutions, businesses, and the community. The disposal of all Government purchased assets that would include electrical and electronic appliances, is required to be verified prior to being disposed. This is specified by the Stores Regulation which has been inherited since the colonial days and has not been changed since. The regulation dictates that any stock declared by a senior responsible officer of a ministry to be inoperative before it is thrown out of the office it has to be verified to be so by the Government Stock Verifier in the Ministry of Finance. Once it has been inspected the waste is then disposed in a manner recommended by the Stock Verifier. This legal requirement may explain why there are no immediate build-up of e-waste in the landfill area given that the Government is the major IT technology user in the country.

3.2 Social Baseline

South Tarawa is very densely populated, with inhabitants originating from islands throughout the Gilbert group as well as South Tarawa itself. Even between the main urban areas of Bonriki, Bikenibeu, Bairiki and Betio, land is almost entirely taken up by residential, commercial and communal buildings and their surrounding compounds. According to the 2015 census the population stands at some 56,388 people representing an average population density of around 2,772 people per km² over less than 15 km² of land area. Within the urban areas, such as Betio, it reaches 10,377 people/km² which is very high among Pacific capitals.

Kiribati is experiencing an acute rise in environmental and socio-economic problems caused by over-population. The population of South Tarawa is growing very rapidly and is a magnet for internal migration from the outer islands as it provides opportunities for employment and consumption, as well as access to higher education and specialist social services not available elsewhere in Kiribati. It grew by almost 10,000 people between 2005 and 2010, an annual population growth of 4.4%.

Kiribati has a median age of 25.7 years and an age dependency ratio of 66 (World Bank). Some 35% of the population are under 15 years of age, representing a significant burden on education and social services; 20% of the population are under 25 years of age, representing a significant burden on higher education, training and employment, which is likely to endure for some years to come. Gender is evenly balanced within the population, apart from in the older age group where women represent 60% of all those aged 60 years and over.

Kiribati's Human Development Index (HDI) value for 2018 was 0.623, a 10.4% increase in the period since 2000. Between 1990 and 2018, Kiribati's life expectancy at birth increased by 8.5 years, mean years of schooling increased by 1.1 years and expected years of schooling increased by 1.4 years.

3.2.1 Indigenous People and Culture

Ninety percent of the total I-Kiribati population are of indigenous origin, the remaining proportion being non-indigenous Chinese and Europeans, many of whom have married indigenous partners. Of the population over the age of 3 at the time of the 2010 census, 92% read Kiribati (Gilbertese), and 76% read English. Some in-married individuals of Tuvaluan origin might speak Tuvaluan with each other, but there is no distinct discrete group that speaks another language.

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

3.2.2 Vulnerable Groups

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

Traditional care systems, for example, sharing remittances, have been breaking down for some time in Kiribati, with greater focus on the nuclear family rather than the traditional extended family. This has particular consequences for single women, vulnerable children, the elderly and people with disabilities. Poor households with insufficient cash to fulfil their social obligations may drop out of social networks. Households with limited labour capacity, such as small households headed by the elderly or households with many children, are increasingly excluded from informal social protection systems. While households are expected to have the right balance of age and gender to meet their needs, this is a growing challenge on the Outer Islands as younger and able-bodied people migrate.¹

3.2.3 Economy

Kiribati has a limited economic base, dominated by (i) investment income from its sovereign wealth fund, the Revenue Equalization Reserve Fund (RERF), (ii) the sale of fishing license fees, (iii) remittances, and (iv) aid flow. Only around 20% of the country's population is formally employed in the cash economy, with 80% of the jobs provided by the public sector. Food security relies largely on subsistence agriculture and fisheries.

Gross National Income (GNI) per capita has experienced a level shift since 2013, with a dramatic increase in government revenue from fishing licenses. GDP per capita was estimated at US\$1,630 in 2018, while GNI per capita sat at US\$3,190 indicating that Kiribati will soon graduate from United Nations Least Developed Country status. Prior to the COVID-19 outbreak, Kiribati's economy performed well with an average annual real GDP growth rate of 4.75 percent in 2015-19, up from about 1.5 percent during 2000-14 (IMF 2021). The stronger growth reflected in part higher public spending financed by record-high fishing revenue – about 75 percent of GDP in 2015-19, up from a 25 percent historical average.

Kiribati's economic prospects are however hampered by low skill levels. Limitations in primary and secondary education mean that 70% of students are at risk of illiteracy. Many children leave school early, particularly

¹ AusAID, 2012, *AusAID Pacific social protection series: poverty, vulnerability and social protection in the Pacific. Kiribati country case study*

during the transition to senior secondary school. Teaching quality is inadequate with, for example, only 35% of senior secondary school teachers having the minimum training required. Although the secondary school curriculum is in English, teachers tend to teach in the Kiribati language, and inadequate English skills prevent I-Kiribati from obtaining jobs overseas. The teaching environment and school infrastructure quality are also issues, with many buildings in need of repair.

After school training is available in different centres, although places are limited. Two centres provide training for seafarers: The Maritime Training Centre (which provides six months of intensive English language training) and the Fisheries Training Centre. The Kiribati Institute of Technology offers vocational training, although not necessarily in skills demanded by employers or the wider region. The University of the South Pacific offers a one-year foundation course to enable students to continue studying in the University's main campuses in Fiji and Vanuatu.

Kiribati has been described by the UN Committee for Development Policy as the most economically vulnerable country in the world. Small population, geographical remoteness, physical exposure to sea-related risks for people living in low-lying areas, and a high ratio of victims of natural disasters are critical components of its economic vulnerability. The Committee has warned that Kiribati is likely to remain a permanently fragile economy as a consequence of its geography and sees little scope for improvement in its economic vulnerability.²

As a small country with a weak economy, Kiribati is at risk to international economic fluctuations. Its use of the Australian dollar means it is particularly vulnerable to fluctuations in exchange rates. Rising international prices impact on the local economy: for example, during the 2008 Global Financial Crisis, higher food prices increased inflation to around 19% (International Monetary Fund). Kiribati's Revenue Equalisation Reserve Fund was badly hit by the GFC, dropping in value from \$637 million in 2007 to \$389 in 2008, with no recovery in 2009, and significantly reducing government income. Remittances dropped significantly during the global recession, as ships were withdrawn from service.³

Pacific island states have seen their vital economic links weakened in recent months by the evaporation of tourism, severe disruptions to international trade, and a reduction in remittances. Previous experience suggests a rebound in commodity prices, tourism, and remittances after the COVID-19 crisis subsides. Many of the islands were quick to react to the spread of the coronavirus, instituting travel restrictions and enhanced screening as early as January in an effort to keep the virus at bay. But as tourists from countries like Australia, New Zealand, and others in Asia may be unable or unwilling to travel due to border controls and travel restrictions, hotels and resorts on the islands are effectively empty, forcing layoffs and closures. In addition, regional airlines face significant damage from the prolonged loss of revenue. The potential for significant revenue losses and reduced operations, together with a chilling effect on global travel, could mean diminished tourism even after the virus recedes.

Shrinking global demand is also affecting the islands dependent on commodity and other exports and supply chain disruptions—including in the fisheries industry—continue to hinder the islands dependent on this sector, including for licensing revenues. Shrinking employment and repatriation of guest workers are expected to lead to a fall in remittances of around 20%. Overall, remittances average about 10% percent of GDP in the Pacific islands (excluding Papua New Guinea). Most countries in the region have limited room to counter the economic impact of the pandemic through additional spending.

² United Nations Committee for Development Policy, 2018. *Vulnerability Profile of Kiribati*.

³ AusAID, op.cit.

3.2.4 Education

Kiribati pre-school and primary schooling is provided locally. Junior secondary schools are present on most islands, many of them established in recent years. Senior secondary schools, however, are fewer in number and mainly on South Tarawa. Many children from the Outer Islands have to travel to South Tarawa for senior secondary school, staying with relatives or boarding. The state provides free compulsory education for children up to 12 years of age, or until the end of Class 6, and free education to Form 3. However, students pay fees to attend senior secondary school. The state subsidises schools. In the 2006 budget, \$363 was allocated for each primary school student and \$1,274 for each secondary school student (ADB 2009:55). However, parents may be required to cover informal costs such as contributions for special events, school supplies and uniforms and, when children attend junior secondary school, many families pay travel costs because schools are further away from many villages.

Enrolments in primary school are relatively high: 90% gross enrolment and 74% net enrolment in 2008. Although completion rates to the end of primary school were above 100 per cent between 1992 and 2006, they fell to 80% by 2009; enrolment at junior secondary schools also fell during this period. Boys are more likely than girls to drop out of secondary school. The overall secondary school enrolment rate is estimated at around 69%, but 94% of girls are enrolled at junior secondary level and 53% at senior secondary school level, compared with 78% and 36% respectively of boys. In terms of literacy the 2010 Kiribati population census defined literacy as a person's ability to read and write in either Kiribati language, or English, or other languages. Kiribati's overall literacy rate at that time (2010) was estimated at 97.7%, with marginal differences between urban areas (98.6%) and rural areas (96.9%). The female rate, in 2010, was consistently higher than the male rate between teenage and age 30 (by 6% on average). There is no gender-based difference between age 30 and age 40, and males still demonstrate a higher adult literacy rate above age 40⁴.

3.2.5 Health and Health-care Services

Despite notable improvements in recent decades, most population health outcomes in Kiribati do not compare well with other small countries in the Pacific. In many respects, this reflects the very difficult geographic, environmental and social determinants of health that the country faces. In principle, the population of Kiribati has low cost access to some form of basic health care, delivered predominantly by the MHMS through a network of four hospitals, 22 health centers and 84 village clinics, all public facilities. Access to basic health services in remote, hard-to-reach small maritime populations in outer islands makes referrals and health services logistics very difficult, expensive and often only available by sea. The range of treatments is limited to primary care on most islands, with secondary care in the main hospital on South Tarawa. More serious cases require medical evacuation to Australia, New Zealand or Fiji.

Kiribati faces a double burden of disease, with high mortality and morbidity from both communicable and non-communicable diseases (NCDs). NCDs, in particular heart disease, hypertension, diabetes and cancer, are becoming more prevalent, contributing to increased hardship in the community and higher health service costs. Obesity among the adult population is a growing challenge and alcohol and smoking-related diseases are on the rise. Indeed, nearly 70% of males and almost 50% of women smoke. As the population ages, non-communicable and lifestyle diseases will comprise an increasing proportion of the health burden, at potentially higher cost to the budget. At the same time, communicable diseases such as acute respiratory infections and diarrhea are common. Tuberculosis and HIV/AIDS are on the rise and becoming a cause for concern for Government.

⁴ UN Committee for Development Policy, op.cit.

While there are currently no identified cases of COVID-19 in Kiribati, certain preventative measures and restrictions, such as limitation of travel, are in place to ensure that the country remains free of COVID-19.

3.2.6 Gender Equality

Kiribati has one of the lowest number of women represented in national parliament in the world (6.5%) and only around 33% of women participate in the labour force compared to 53% of men⁵. The majority of formal businesses are owned and controlled by men (57%)⁶. Women are mainly engaged in the informal sector and their work is usually home-based care work, subsistence agriculture, marketing of agricultural products, and informal trading.

Kiribati society has traditionally been male dominated with women in subordinate positions. In traditional communities, elder men are the decision makers. Following marriage, women move into their husband's household where they assume a subordinate position and take on the bulk of domestic chores. In the traditional economy, women have the heaviest workloads. Although they have less access to employment, 38% of paid workers were women in 2005.

According to the 2006 national household survey, around one in five households are headed by single females. Overall, these are over-represented among the poor, comprising around one in four households in the poorest quintile in South Tarawa and the rural Gilbert Islands. The ADB in 2009 noted that extended family support for abandoned wives was decreasing, while increasing numbers of men are leaving their wives. It is difficult for abandoned wives to get child maintenance through the courts, given the absence of family law in Kiribati, although the Ministry of Internal and Social Affairs supports a small proportion of abandoned wives by obliging husbands to pay child maintenance.

Gender Based Violence (GBV) rates in Kiribati are more than twice the global average with 68% of ever married women aged 15-49 in Kiribati having been subject to GBV⁷. Availability of alcohol, high unemployment, overcrowding and high living cost drive high levels of GBV in South Tarawa. The GOK has established a national SafeNet referral system linking health, police and social welfare services. However, this has not been rolled out in all outer islands.

3.2.7 Access to and Use of Digital Services

International connectivity and access to high-speed internet is limited in Kiribati, constraining the ability of individuals and businesses to unlock the full potential of a digital economy. International connectivity is still a challenge, with currently only satellite communications available. The deployment of the proposed EMCS submarine cable is currently pending decisions by the governments of Kiribati, Nauru, and the Federated States of Micronesia (FSM). Terrestrial fixed and wireless services are also needed to connect users to the Internet. Four outer islands still remain to be connected to mobile network services. As of 2020, households with broadband Internet access stood around 12% with a fixed-broadband subscription rate per 100 inhabitants of 0.2 (World Bank Study) which is among the lowest rates in the Pacific. With a UN e-Government ranking of 145 out of 193 countries worldwide, Kiribati also ranks among the lowest for the region.

Recent years have seen an increasing demand for mobile Internet services, with over 55,000 mobile subscribers – about 48 percent of whom are 3G or 4G users. As of 2020, basic mobile phone penetration stands at about 47 percent of the population in 18 (out of 22 inhabited) islands, with mobile networks covering about

⁵ ILOSTAT (2018) <https://www.ilo.org/ilostatcp/CPDesktop/?list=true&lang=en&country=GBR>

⁶ Statistic provided by Ministry of Commerce (October 2019).

⁷ Secretariat of the Pacific Community, 2010. *Kiribati Family Health and Support Study: A study on violence against women and children*. Noumea, New Caledonia.

85 percent of the population (3G/4G geographical coverage). About 87 percent of households belonging to the highest wealth quintile have access to Internet when compared to only 14 percent of households from the lowest wealth quintile. The affordability target for entry-level broadband services in developing countries is less than 2 percent of monthly gross national income per capita (ITU – United Nations Educational, Scientific and Cultural Organization/UNESCO Broadband Commission). Globally in developing/emerging markets, mobile broadband services typically cost below US\$1 to US\$5 per GB. In the context of Kiribati, owing to reforms carried out by Government in the ICT sector and through the introduction of competition, mobile broadband service affordability is at about 5.2 percent of monthly gross national income per capita, with indicative costs of bandwidth being US\$3.00 per GB. According to the Kiribati Social Development Indicator Survey (2018-19), 7 in 10 households own mobile phones. Two in every five households have radio and Internet at home, and 31 percent had computers. Mobile phone usage among women is higher compared to men (60 percent for women and 53 percent for men). One in every two women uses the Internet when compared to two in every five men. 30 percent of men versus 24 percent of women have specific ICT skills in at least one of nine activities, including sending e-mail attachments and using copy/paste.

4 Activity description

4.1 Purpose, Planning and Design

The proposed project development objective (PDO) is to build the foundations and strengthen the Government's technical and institutional capacity for digital public service delivery. This will involve supporting key focus areas outlined in Kiribati's Digital Government Master Plan (2021), specifically governance, technical infrastructure for digital government, and e-Government applications. The Project has five components as described below.

4.1.1 Component 1. Digital Government Coordination

Component 1 has two sub-components:

i Government Digital Transformation Office

This subcomponent will support the establishment and strengthening of a Digital Transformation Office (DTO) for sustainable digital government coordination and implementation. The Master Plan recognizes as a prerequisite the existence of a well-functioning, competent and motivated coordination institution for ICT management of government institutions. DTO responsibilities are expected to include among others ICT strategy planning, implementing and supervising processes, along with public relations activities on digital transformation issues. To support the establishment of the DTO, activities here will encompass technical support for principles, processes, legal frameworks, training, and other capacity-building requisite for a competently staffed and well-functioning office, as well as the development of a coordination mechanism with line ministries.

ii Enabling Policies and Legislation for Digital Transformation

This sub-component will help provide upstream enabling legal, regulatory, and institutional support, as well as capacity-building necessary to lay the foundations for digital government and accelerate the digital economy in Kiribati. Key activities include:

- Digital Government Implementation Roadmap. This will encompass technical assistance for the development and operationalization of a detailed implementation plan, building on the Kiribati Digital Government Masterplan (approved in 2021) and including stakeholder consultations and developing processes for implementation.
- Legal and regulatory framework for Digital Government. Activities here will span technical support and capacity building for establishing, modernizing and implementing the legal and regulatory frameworks, and institutional and data governance arrangements, needed to support digital government and the digital economy, particularly cybersecurity, cybercrime, data protection, consumer protection, digital ID, e-signatures, digital transactions, e-commerce and Netsafe principles and practices.
- Government Cyber Security Program. The subcomponent will encompass technical assistance and capacity building for the development of operational and administrative standards, assurance, monitoring, audit, and Cyber-Security Emergency Response Team (CERT) capabilities.

4.1.2 Component 2. Digital Government Foundational Infrastructure

This component will finance a range of interventions and investments focused on technical enablers and infrastructure for e-government. As emphasized in the Master Plan, technology must be integrated into

government processes in a sustainable way with proper institutional and legislative support, including training of personnel. There will be two subcomponents.

i Government Enterprise Architecture

This subcomponent 2.1 encompasses support for the following activities:

- The design and implementation of digital governance and decision-making processes encompassing a business process review to ensure timely and quality data, and accessible information for informed decision-making and change management.
- The design and development of Enterprise an Interoperability Framework and associated Interoperability solution for government systems.

ii Digital Government Infrastructure

This subcomponent will support the design and procurement of digital government infrastructure and platforms to support information systems and applications, including:

- *Secure Government Network and Data Center, Disaster Recovery/Business Continuity, Government Cloud.* This subcomponent will consider and evaluate alternative data center or cloud computing ownership models taking into consideration climate change impacts, disaster risks security, resource management, operational and capital cost of operations, continuity of operations, and total cost of ownership. Remote and local data center options will be analyzed, including to promote compatibility and interoperability with existing and proposed digital platforms and solutions, as well as compliance with energy efficiency certifications.
- *Government Core Systems*, such as unified communications (secure email and VOIP telephony system), and document management systems. Improved communications across key Government agencies will enable the deployment of disaster risk monitoring tools and improve dissemination of early warnings to help mitigate against risks.

4.1.3 Component 3. Digital ID and e-Signatures Platform

This component will serve to reinforce foundational ID systems and setup digital ID, recognized as a cornerstone of digital government in the Master Plan. With electronic identification tools, citizens and businesses can carry out secure electronic transactions and take full advantage of digital government, cutting out paperwork.

i Strengthening foundational ID systems

Subcomponent 3.1 will support the strengthening of the existing national ID system and civil registry (CR), both under the Ministry of Justice, as it pertains to enabling the introduction of an inclusive and trusted Digital ID and e-Signatures Platform, complementing the legal reforms under subcomponent 1.2. These activities will include improvements to core software and hardware, data governance, external interfaces, information security, and business processes, as well as supporting strategic and relevant initiatives to increase registration coverage. Support will be provided to the Ministry of Justice for conducting an assessment to identify potential disproportionate barriers faced by women, especially those in outer islands, to obtain national identity cards, as well as in the implementation of specific actions aimed at addressing identified barriers. Based on

constraints identified, potential actions could include targeted information campaigns and support for online/decentralized application process to address mobility constraints.

Furthermore, as robust civil registration is a critical enabler of women and girls' access to services such as healthcare, education, asset management, and financial services, also enabling government to obtain accurate population data for policies that take into account specific needs of women and girls, the Project will ensure that the design of the upgraded CR system incorporates a review and, if needed, incorporation of vital statistics that are critical for gender specific policy-making.

ii **Developing an inclusive and trusted Digital ID and e-Signatures Platform**

Subcomponent 3.2 will support the design, development and early functioning of a Digital ID and e-Signatures Platform that would enable citizens and residents of Kiribati to securely verify their legal identity (i.e. linked to their national ID, civil registration records, and/or other official documents) and implement e-signatures in ways that are equivalent to wet signatures.

4.1.4 **Component 4. Government Services Portal and Priority Digital Services**

This component will support the development and scaling up of a national government portal consisting of a single window to facilitate citizen and business access to public information, interactions and transactions with Government ministries and agencies. As envisioned in the Master Plan, the portal will consist of both information services (information about how the government works and what services it provides) and e-services (services executable directly in the portal).

Focus will be on identifying and implementing 1-2 priority citizen-centric public services to be deployed through the portal, based on institutional and technical readiness assessment for digital services. As digital government can offer transformative opportunities for women to access information and services on health, education, gender-based violence related services, jobs and financial services, the project will ensure that activities to support digital public service delivery are gender-inclusive, as outlined below.

4.1.5 **Component 5. Project management**

This component will support the implementing agencies in the management and implementation of the Project, including financing of training and operating costs. Activities encompass strengthening the capacity of implementing agencies to process project transactions, project coordination, communications, outreach, procurement, financial and contract management, reporting, audit, fiduciary, safeguards, monitoring and evaluation.

4.2 **Construction**

The Project's physical investments will be limited to construction of the National Data Centre (NDC) which is part of a broader ICT system being developed in Kiribati.

Under the World Bank-financed Kiribati Connectivity Project the Government is installing a submarine cable system to connect Kiribati (South Tarawa), Nauru and the Federated States of Micronesia/FSM (Kosrae-Pohnpei) with onward connectivity from Pohnpei to Guam (US) via the HANTRU-1 cable, as part of the East Micronesia Cable system (EMCS). In 2017, the government established a new company BwebwerikiNET Ltd (BNL) tasked with operating submarine fiber optic cables running to Tarawa and Kiritimati Islands and enhancing telecommunication infrastructure on the outer islands. The Asian Development Bank is financing the Southern Cross NEXT cable spur to Kiritimati Island with construction underway and expected to be ready

Legend

- Cable Vault
- Digitised features**
 - Property Boundary
 - Proposed Fronthaul Duct
 - Proposed Seaward Duct
 - Proposed Ocean Ground Bed
 - Existing Electrical Box
 - Proposed Building
 - Proposed Car Park
- Surveyed Features**
 - Kerb
 - Wall
 - Minor Contour 0.2m
 - Major Contour 1m
 - Fence
 - Transmission Tower Earth Mat
 - Guy Wire Anchor
 - Sign
 - Ground Level
- Water levels**
 - Surge 3.41m
 - MHW 2.53

KIRIBATI CONNECTIVITY PROJECT
BMH LOCATION PLAN

02.55 10 15 20 25
Meters

argo environmental
WesEng Consulting Ltd

The NDC will be connected to Government ministries and offices via the Government Wide Area Network (GWAN) which will comprise an optic fibre cable installed in existing conduits installed during the Kiribati Road Rehabilitation Project (KRRP). The GWAN will in turn connect to local area networks (LAN) within each Government ministry which will require cabling and network devices. It is expected that the GWAN and LAN will be delivered by some form of public private partnership (PPP) procured through the DTO.

If the NDC is co-located with the landing station civil works will be very limited as it will use space within the CLS building to install a series of hardware cabinets similar to that illustrated in Figure 4.2. The landing station building and cable connections are largely completed. The installation of the NDC cabinet and hardware seen

below will take place after the completion of these. The CLS will have an pr-existing connection to the GWAN so no additional cabling will be required after NDC installation.



Figure 4.2 **Example Equipment Cabinet**

If the NDC is located in Bairiki it is expected to comprise a prefabricated container-based facility selected based on the capacity requirements established on a concrete foundation. Prefabricated data centres are typically deployed with heating, ventilation and air-conditioning (HVAC) equipment and diesel generators to accommodate power interruptions. Also, a small room for the technical staff is usually included in the data centre. The option to power the NDC using solar panels installed on the roof of the facility will be considered during the design process, with the alternative being connection to the South Tarawa electricity grid.

An example of the type of facility that could be expected is shown on Figure 4.3.



Figure 4.3 Typical Pre-fabricated Modular Data Centre

4.3 Operations

The Project's operations phase will involve the provision of Government services via digital methods. The NDC operations will be largely passive with ongoing monitoring and maintenance as required by Government technical staff. In the event of a power outage the NDC's back-up generator (diesel-powered) will start-up automatically to ensure connectivity is maintained at all times. All infrastructure will be built to withstand foreseeable extreme weather events and the facility will be secured to reduce the risk of vandalism or other public access.

4.4 Decommissioning

Once the digital government infrastructure is established it will be maintained in perpetuity. There will be a need to replace components as they reach the end of their serviceable life; however no formal decommissioning phase is proposed.

5 Policy, legal and regulatory framework

5.1 Introduction

This section describes the following legal and regulatory instruments relevant to evaluating and managing the environmental and social impacts of the project:

- Country specific policy, legal and administrative frameworks relevant to the project.
- World Bank Environmental and Social Framework (ESF) and associated environmental and social standards (ESS) relevant to the project.
- World Bank Group Environmental, Health and Safety Guidelines (EHS Guidelines) relevant to the project; and
- Other relevant international and regional conventions that are adopted by the Borrower, such as Stockholm Convention for Persistent Organic Pollutants, Basel Convention for hazardous wastes and disposal.

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

5.2.1 Environmental Legislation

i Environment Act 1999

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

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

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

- a) to provide for and establish integrated systems of development control, EIA and pollution control;
- b) to prevent, control and monitor pollution;
- c) to reduce risks to human health and prevent the degradation of the environment by all practical means, including the following

- i) regulating the discharge of pollutants to the air, water or land;
 - ii) regulating the transport, collection, treatment, storage and disposal of wastes;
 - iii) promoting recycling, re-use, reduction, composting and recovery of materials in an economically viable manner; and
 - iv) to comply with and give effect to regional and international conventions and obligations relating to the environment;
- d) protecting and conserving the natural resources threatened by human activities, particularly those resources of national and ecological significance as may be classified under the categories of terrestrial vegetation, coral, fish and marine life.

ii Environment (General) Regulations, 2017

The *Environment (General) Regulations 2017* complement the *Environment Act* and provide the requirements for the project applicant to obtain an environment licence. The Regulations set out requirements for the EIA report of the development. Environmentally significant activities requiring EIA according to their environmental significance are listed in the schedule to the Regulations. Activities that are considered to create a significant environmental impact require application for environmental licence. Some activities further require an EIA report.

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

The NDC design and construction has been considered against the ESA Schedule and there are three activities that are potentially triggered as discussed below:

- *Activities involving significant coastal and marine impact 1. Extraction of aggregate, stones or shingles, sand, reef mud and beach rock – (ii) for construction work.* The concrete foundation for the prefabricated NDC option will require a small quantity of aggregate and sand. This material will be sourced from the Environmentally Safe Aggregates for Tarawa (ESAT) project or imported. Hence this activity is not triggered.
- *Activities involving harmful chemicals 1. storage or transport of more than 1000 litres of petroleum, not including standard fuel tanks of conveyances.* The back-up generator will be diesel-powered, however it will have an integrated fuel tank with a capacity less than 1,000 litres. No separate fuel storages will be used.
- *Operation of a facility...(ii) that has a total expected power generation capacity of 100 kilowatts or more.* The diesel back-up generator will generate power at times of power outage and will need to have sufficient capacity for full operation of the data centre. The key performance indicator for

guaranteed available power to the NDC is 40 kilowatts⁸, hence the proposed specification for generator capacity is 50 kilowatts.

Based on the above it can be concluded that none of the proposed activities meet the criteria for ESAs and therefore an Environment Licence is not required.

5.2.2 Labour Legislation

Labour legislation relevant to the project is summarized in the LMP (Annexure 1).

5.2.3 Information and Communications Technology Governance

The Government of Kiribati recognises the importance of digital government and is laying the foundations for this in Kiribati. While still at an early stage, digital transformation is a high and urgent priority in Kiribati. The government recognizes ICT as a vital part of the country's development in its 20-year vision for Kiribati (KV20), the Government Manifesto, and National ICT Policy (2019), and is committed to transforming the delivery of public services and using digital solutions to enhance good governance.

Kiribati's Digital Government Master Plan (2021) lays out basic foundations and potential quick-wins for digital government. The Master Plan envisages a high-level digital transformation process beginning with digitalization of business processes in government agencies, data sharing between government agencies following the single data collection ("once-only") principle, building e-services for citizens, and optimizing digital government processes. The main enablers of an integrated digital government are identified by the Plan to include digital services to citizens, interoperability and secure data exchange, digital identity and trust infrastructure, base registers, and metadata management of government systems. A "whole of government" approach is proposed to establish common standards and provide access to shared services across all arms of government.

i Kiribati National ICT Policy

The National ICT Policy's objectives include *"...to improve the lives of citizens through further development of the economy and citizens' capabilities. Increased availability of affordable and reliable telecommunication services is a key input to economic growth, particularly for presently un-served and underserved remote areas of Kiribati as demonstrated in the previous sections. Reliable and affordable telecommunication is also the key to unlocking innovation in other sectors."* Amongst the twelve guiding principles underpinning the Policy are:

- non-discrimination – with all services available to all people at the same price, terms and conditions;
- enabling cyber security awareness and protection; and
- facilitating effective nationwide disaster risk management.

ii Kiribati National Cyber Security Strategy 2020

The National Cyber Security Strategy recognises that while ICT development is an enabler and driver for Kiribati's social and economic development there are also cybersecurity risks and threats such as spam and phishing activities by cybercriminals. Children are also exposed to these risks. The Strategy's two objectives

⁸ eGA (2019) *Draft Project Documents for Government Data Center*.

are: the pursuit of economic growth through ICT; and proper protection for all Kiribati citizens against cyber threats which are supported by three guiding principles:

- a safe and secure cyber environment for all citizens;
- protection of fundamental rights; and
- balanced approach in line with international and regional best practices.

The Strategy initiatives include establishment of a Computer Emergency Response Team, development of National Cybersecurity Guidelines and establishment of a Child Online Protection Working Group (COPWG).

- Cybercrime Act 2021

The *Cybercrime Act 2021* is “An Act to provide for the prevention, investigation and suppression of computer related offences and for other connected purposes”. The Act instructs the formation of a Cybercrime Unit and introduces penalties for (amongst other matters): computer-related fraud; sexual abuse material depicting a child and solicitation of children; and harassment using a computer system.

5.3 World Bank Environmental and Social Standards and Policies

5.3.1 ESF Standards Relevant to the Project

The World Bank has classified the Environmental and Social risk as ‘Moderate’ for the Project in accordance with the ESF. Seven of the ten Environmental and Social Standards (ESSs) of the World Bank’s ESF have been screened as relevant. They are assessed in Table 5.1 below.

The other three are considered not relevant, namely: ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources, ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and ESS9 on Financial Intermediaries.

Table 5.1 Required Project ESS Actions

Environmental & Social Standard	Required Measures and Actions
ESS1 Assessment and Management of Environmental and Social Risks and Impacts	<p>The project is expected to improve the GoK’s capacity for digital public service delivery. Project activities may also present moderate environmental, social, health and safety risks from minor construction activities, the generation of waste (including construction and e-waste), the consumption of energy, and inequity in access to digital services.</p> <p>The GoK will assess and manage environmental and social risks and impacts associated with proposed Project activities in a manner which is proportionate to the significance of the potential risks and impacts, and which utilizes a mitigation hierarchy approach during Project preparation. This ESMP addresses the requirements of ESS1 and was the subject of consultation with Government and Non-Government stakeholders during preparation (see Annexure B).</p>
ESS2 Labour and Working Conditions	<p>The project will have direct employees and contractors. The project will implement the Labor Management Procedures (LMP) (Annexure A) which set out the ways in which project workers will be managed, including consultants and contractors. The project LMP also establishes labor guidelines for all categories of workers, and includes a Code of Conduct and functional grievance mechanism for labor grievances, drawing on national laws and regulations and international best practices, as well as ESS2 to manage employment-related complaints.</p>

Environmental & Social Standard	Required Measures and Actions
ESS3 Resource Efficiency and Pollution Prevention and Management	The project may result in minor pollution risks from small scale construction works, the generation of e-waste and the consumption of energy. MICTTD will develop an ESMP including a waste management plan (WMP) to manage these risks and impacts prior to project appraisal.
ESS4 Community Health and Safety	The ESMP includes measures to: minimize community exposure to noise and dust from construction activities; ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project (through the SEP); and prevent and respond to sexual exploitation and abuse (SEA), and sexual harassment (SH) through the LMP. Digital Government access issues will be managed through identification of groups at risk during project preparation and effective stakeholder engagement during implementation, with a focus on developing safeguards within the institutional frameworks to ensure equitable access and means to engage with and complain about services. For data privacy, project component design will follow good international practice in setting up the Digital National ID system and Civil Registration System.
ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	MICTTD will ensure that the site selected for the modular NDC at Bairiki (if that option is chosen) is on government land or existing government-leased communal land. Owners will be informed of their rights to refuse to lease their land, since the siting can be adjusted. Such land will be selected to ensure that there will be no displacement of communities from the government-leased land. The CLS site at Nanikai is already government-leased communal land.
ESS8 Cultural Heritage	The final ESMP will include mitigation measures to avoid impacts on cultural heritage, including consultation and the implementation of chance find procedures (see Annexure D).
ESS10 Stakeholder Engagement and Information Disclosure	MICTTD will disclose, and adopt the preliminary SEP prior to project appraisal and implement the SEP throughout the Project implementation period. MICTTD shall adopt, implement and update the Grievance Redress Mechanism (GRM) (see Annexure B) within 30 days of the Effective Date and thereafter implement and update it throughout Project Implementation.

5.3.2 World Bank Group Environmental, Health and Safety Guidelines (EHS 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. When host country regulations differ from the levels and measures presented in the EHS Guidelines, projects are expected to achieve whichever is more stringent.

i General EHS Guidelines

Guideline 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.

Guideline 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).

If necessary, the CIU Safeguards Advisor will assist the contractor in undertaking the JSA and preparing its Health and Safety Management Plan based on the following mitigation hierarchy principles:

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

Guideline 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 labour.

Guideline 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.

ii EHS Guidelines for Telecommunications

The WB EHS Guidelines for Telecommunications are applicable to telecommunications infrastructure such as fixed line and wireless voice and data transmission infrastructure, including long distance terrestrial and submarine cables (e.g., fiber optic cables), as well as radio and television broadcasting, and associated telecommunications and broadcasting installations and equipment. Table 5.2 sets out an evaluation of the WB EHS Guidelines for Telecommunications against the activities proposed under the Project.

Table 5.2 Project evaluation against WB Telecommunications EHS Guideline

Telecommunications EHS Guidelines Element	Relevance to Project
Environment	
<ul style="list-style-type: none"> • Terrestrial habitat alteration • Avian collisions • Marine Habitat alteration • Visual Impacts 	<p>Project-financed infrastructure will be situated on already converted land on South Tarawa. Potential marine habitat impacts associated with the submarine cable installation were assessed under the Kiribati Connectivity Project and found to be insignificant.</p> <p>The NDC (if stand-alone) will be a small, containerized structure that will not be conspicuous in the Bairiki urbanised context.</p>
<ul style="list-style-type: none"> • Hazardous materials and waste 	<p>The proposed activities will not involve use of hazardous materials (other than small quantities of fuel used for operational equipment, e.g. back-up power).</p>
<ul style="list-style-type: none"> • Electric and magnetic fields (EMF) 	<p>Fiber-optic equipment does not emit EMF. The evidence for adverse health risks from EMF from 4G and other mobile technology is weak.</p>
<ul style="list-style-type: none"> • Emissions to air 	<p>Emissions from telecommunications projects may be primarily associated with the operation of vehicle fleets, the use of back-up power generators, and the use of cooling and fire suppression systems. These matters are not relevant to the scale and extent of Project activities.</p>

Telecommunications EHS Guidelines Element	Relevance to Project
<ul style="list-style-type: none"> Noise 	The main source of noise in telecommunications facilities is associated with the operation of back-up power generators. These will only be used intermittently and have a relatively low noise emission in an urban context.
Occupational Health and Safety	
<ul style="list-style-type: none"> Electrical safety Construction 	Addressed in Section 6.2.3 of this ESMP
Community Health and Safety	Addressed in Section 6.2 of this ESMP

6 Potential environmental and social impacts

6.1 Planning/design

6.1.1 Land Use and Access

The NDC siting option in Bairiki will require access to a land portion to establish the facility. As the modular option will only require a small land area a number of options on existing Government owned or leased land are expected to be available. For the NDC/CLS co-location option land access has already been secured under the Kiribati Connectivity Project.

There may be a need to establish a short easement to install the cable connection between the Bairiki NDC and the GWAN which will be confirmed during project implementation and addressed in the Final ESMP. As noted previously the cable duct for the GWAN was installed as part of the Kiribati Road Rehabilitation Project (KRRP).

6.1.2 Health and Safety in Design

Effective management of health and safety issues requires the inclusion of health and safety considerations during design processes in an organized, hierarchical manner that includes the following steps:

- identifying project health and safety hazards and associated risks as early as possible in the project cycle including the incorporation of health and safety considerations into the worksite selection process and construction methodologies.
- involving health and safety professionals who have the experience, competence, and training necessary to assess and manage health and safety risks.
- understanding the likelihood and magnitude of health and safety risks, based on:
 - the nature of the project activities, such as whether the project will involve hazardous materials or processes.
 - the potential consequences to workers if hazards are not adequately managed.
 - designing and implementing risk management strategies with the objective of reducing the risk to human health.
 - prioritizing strategies that eliminate the cause of the hazard at its source by selecting less hazardous materials or processes that avoid the need for health and safety controls.
 - when impact avoidance is not feasible, incorporating engineering and management controls to reduce or minimize the possibility and magnitude of undesired consequences.
 - preparing workers and nearby communities to respond to accidents, including providing technical resources to effectively and safely control such events; and

- improving health and safety performance through a combination of ongoing monitoring of facility performance and effective accountability.

6.2 Construction

6.2.1 Environmental Risks

Environmental risks associated with construction are limited and associated with the establishment of the National Data Centre (NDC); and network installations in individual Government agency premises - as a downstream impact of the *Digital Government Implementation Roadmap* technical assistance – potentially resulting in the generation of small emissions of dust, noise, waste, sedimentation etc. from minor construction works (e.g. digging of trenches). The new network and associated hardware will likely generate e-waste from redundant ICT components.

Two siting options are under consideration for the NDC. Co-location of the NDC with the submarine cable landing station (CLS) will have negligible environmental risk as all NDC equipment will be housed within the CLS building which will be sited on disturbed land at Nanikai. The potential environmental impacts associated with the submarine cable works and CLS establishment were assessed under the Kiribati Connectivity Project.

The second option - establishment of a pre-fabricated modular data centre in Bairiki - will involve minor construction activities including a concrete slab foundation (similar to a small house foundation), optic fibre cable installation to connect the NDC to the GWAN (maximum 50 metres length) and associated civil and utility works (roof installation, power and water connection etc.). The characteristics and scale of these works will be less involved than for a small house construction with the potential for minor noise, dust and traffic impacts over a short construction period.

6.2.2 Social Risks

The potential for SEA/SH impacts during construction is limited by the low number of construction workers, and works taking place in urban areas on South Tarawa where access to health and specialist support are greatest. However, a worker code of conduct is included in the LMP which outlines expected worker behaviour, clarifies sanctions against workers, and outlines how any incidents of SEA/SH are to be reported and addressed.

6.2.3 Occupational Health and Safety

Civil works associated with the NDC establishment at the CLS pose very low safety hazards mainly associated with manual handling and electrical connections. Electrical connections must be undertaken by a qualified electrician who will be a member of the NDC construction contractor's team. For the Bairiki option civil works will be more involved however safety hazards remain low and can be readily managed with a simple health and safety plan. While the electrical connections per se are routine, it will be necessary in the case of the Bairiki option that any underground service installation is preceded by a careful existing service location exercise to ensure that subsequent trenching can be undertaken safely. There is a small possibility that asbestos containing material could be encountered during hardware installation in Government buildings leading to OHS risks and small quantities of asbestos containing waste. The Secretariat of the Pacific Regional Environment Programme (SPREP) financed a survey of asbestos-contaminated construction material in Pacific Island Countries, including Kiribati, in 2015. The survey outcomes in Kiribati indicated that *"Apart from residences there were only a few locations where asbestos building materials were detected in Betio, Bairiki and Bikenibeu"* and these were not major and included sunshade panels at the Ministry of Fisheries and Ministry of Finance, structures that would not be disturbed by ICT infrastructure installation.

6.2.4 Community Health and Safety

The establishment of the NDC at Bairiki may result in community health and safety impacts both from the completion of minor civil works (e.g., dust, noise, increased traffic) and as a fire hazard once it is operational. These risks will be managed i) through the implementation of a Construction ESMP; and ii) through the inclusion of fire safety controls in the data center design in accordance with relevant international standards.

Contractors for the data center may bring workers from overseas in small numbers and there may be risks to communities. Consultations during project preparation will identify issues with imported labor, gender, child labor, demand for sex workers, and trafficking, even if the risk is minimal considering the small number of overseas workers. The Code of Conduct and CESMP will include suitable management measures and mitigations.

Whilst there are currently no active COVID-19 cases in Kiribati, project activities have the potential to contribute to the spread of COVID-19 without adequate controls and procedures. Project activities will be completed in accordance with national COVID safety regulations and guidelines and the World Bank COVID-19 guidance for construction and civil works.

6.3 Operations

6.3.1 Environmental Risks

Environmental risks during operation are negligible and mainly associated with NDC visitation and operation of the back-up power system. The NDC will include personnel facilities such as a small kitchen and toilets. These facilities will be connected to a septic tank that will treat the sewage. The back-up power system is expected to be a diesel-powered generator which will generate a small quantity of emissions similar to a diesel car. These emissions will not be measurable in the context of South Tarawa's background air quality conditions.

The design of the NDC (irrespective of its location) will consider the installation of solar panels to provide power for the server operations to reduce non-renewable energy consumption and demand on the already constrained South Tarawa electricity generation system. Sufficient solar panels could be installed on the roof of the containerized data centre or the CLS building.

As digitalisation of business processes in Ministries is enabled over time connected local area networks (LAN), workstations and other digital resources will be required inside those agencies. To build those networks cabling is needed along with setting up network devices which will result in redundant IT hardware and e-waste.

6.3.2 Social Benefits

The project is expected to bring about significant economic and social benefits by supporting investment in climate resilient digital infrastructure, and by mobilizing private sector investment to increase access to higher quality, lower cost digital services. Affordable, high-speed internet has been associated with socio-economic empowerment by increasing users' access to services, including education, employment and health. In addition, access to ICTs can be especially beneficial to marginalized and vulnerable populations by helping to improve their voice in decision making processes, engagement with government services and inclusion within

the digital economy⁹. For women in Kiribati this represents an important opportunity to address existing barriers as outlined above.

The social benefits expected to accrue through improved and expanded digital connectivity include:

- *Increased access to government information and services* - made possible through the new digital ID and improved internet access in areas where office visits are not possible, will make it easier for people to enroll in programs, access subsidies and benefits, acquire passports, register births and deaths etc.
- *Increased access to banking services* which will enable people living in remote areas to open bank accounts, pay bills, transfer funds and access credit needed for micro-small business development, customary obligations, education expenses and home repairs.
- *Improved educational outcomes* by connecting teachers and students with the vast array of teaching and learning materials available on the internet to supplement existing resources, and by increasing home schooling options, especially for secondary and post-secondary students residing in areas where in-person learning in all subjects is not available. Women with child and home care responsibilities will also benefit from access to home-based, flexible learning opportunities including massive open online courses (MOOCs).
- *Improved employment prospects* by increasing awareness of training opportunities provided by educational institutions and NGOs leading to improved participation rates and enhanced knowledge and skills required for employment. Further, given the heavily constrained job market in Kiribati new employment prospects could become available in the digital space (such as web-designers, database administrators, social media managers and telemarketers) because of upgraded and expanded coverage throughout the country.
- *Improved health outcomes* by providing the public with relevant, user-friendly information on wellness and disease prevention; by connecting health care workers in remote areas with urban and overseas based professionals for consultations, and by enabling access to new information on disease identification and management. Benefits in primary and secondary care outcomes will accrue by enabling online diagnosis and treatment; digitizing medical records to improve accuracy and responsiveness of care; enhancing statistical reporting and administration and expanding medical professional training and development opportunities.
- *Increased access to NGO support services* which is especially important for people who are vulnerable due to unemployment, domestic violence, illness, addiction, disabilities, aging, isolation, lack of transportation, and those living in remote locations.
- *Increased capacity to address GBV, SEAH and child abuse* by enabling victims and informants throughout the country to report concerns and seek assistance, in confidence, using an on-line platform such as a National Help Line, staffed by trained professional who could liaise with police and legal system, activate referrals and organize safety nets as needed. Expanded GBV and child protection services could be explored in collaboration with relevant ministries.

⁹ RMI Digital Project, *DRAFT Gender Assessment*, Nov. 2020

- *Improved early warning and crisis response capabilities* for emerging and emergency situations including climate and health events which could lead to improved preparedness, increased resilience and saved lives; especially amongst those who are most vulnerable.
- *Improved connectivity to family, friends and social networks* in Kiribati and abroad, which can build social capital, reduce isolation, marginalization and stress especially during times of uncertainty - and may also dissuade urban and overseas migration.
- *Improved ability to collect and analyze information* from organizations and individuals throughout Kiribati as the basis of national and sector specific policy and program development and monitoring. This will enable government agencies to be more responsive to changing circumstances and needs.

6.3.3 Social Risks

i Sexual exploitation, abuse and sexual harassment

As noted in Section 3.2.6 gender-based violence (GBV) - including all forms of physical, sexual and psychological abuse - is seriously entrenched in Kiribati society raising concerns about the impact of increased internet/social media access on GBV. Analyses conducted across the Pacific Region have shown that women and girls are particularly vulnerable to threats such as online bullying, harassment and abuse.¹⁰ A 2020 study analyzing on children's online safety in Kiribati, Papua New Guinea and the Solomon Islands¹¹ showed that the most commonly identified online threats, among both parents and children, were inappropriate content, cyberbullying, and harmful influences, with social media and entertainment platforms posing a particular risk to children's safety. In the study, the majority of respondents recognized that girls were more vulnerable to online risks, mirroring their heightened vulnerability to violence and abuse offline. This was shown to commonly result in parents' perception that the only way to protect female children is to limit their access to the Internet. Further, studies conducted in the Pacific reveal that parents and caregivers are concerned about children's access to digital content and exposure to age and culturally inappropriate material, which can lead to an "erosion of cultural values and practices". They also reported feeling ill-equipped to control or protect their children online, which highlights the need to provide support in this area.

Legislative reforms to address harmful digital communications, alongside targeted awareness activities to bridge knowledge gaps at a community level, is a critical priority. Component 1.2 of the Project itself is designed as a mitigation measure and involves technical support and capacity building for establishing, modernizing and implementing the legal and regulatory frameworks recently put in place, and institutional and data governance arrangements, needed to support digital government and the digital economy, particularly cybersecurity, cybercrime, data protection, consumer protection, digital ID, e-signatures, digital transactions, e-commerce and Netsafe principles and practices.

ii Exclusion of Vulnerable or Isolated Groups

Vulnerable community members or those on Outer Islands at risk of exclusion will participate equitably in the Project outcomes through systematic engagement with and support of the Kiribati Local Governments Association (KILGA), which is a collective of 23 member island councils, and Kiribati Association of Non-

¹⁰ Most recently, a gender assessment conducted as part of the Digital Republic of the Marshall Islands Project (P171517) showed that women, and particularly young women, are at particular risk of online bullying and harassment.

¹¹ Third, A. et al. 2020. *Online Safety in the Pacific: A report on a Living Lab in Kiribati, Papua New Guinea, and Solomon Islands*. Sydney. Child Fund Australia, Plan International Australia, and Western Sydney University.

governmental Organizations (KANGO), which is a collective of civil society organizations with more than 40 member organizations representing different members of the Kiribati community across the islands.

6.4 Decommissioning

There will be no defined decommissioning phase as such as digital government is expected to be maintained in perpetuity. Individual hardware components of the system will require upgrade or replacement over time as they reach end-of-life, malfunction or are superseded by improved technology. This will result in generation of e-waste requiring disposal.

No other significant environmental or social impacts are anticipated with this phase of the project.

6.5 Emergency/incidents

Kiribati faces a moderate degree of risk to natural disasters. Most of the population lives a subsistence lifestyle as Kiribati has few natural resources and is one of the least developed Pacific Island countries. Even minor emergencies can overwhelm national capacity and significantly affect communities and the economy.

To date, no major rapid onset natural disaster has occurred, however climate-change related events are of increasing concern. Since November 2016 below average rainfall has led to an ongoing drought across the country, with the southern island most severely affected. Kiribati's traditional dry season, or Aumaiaki, occurs between April and September, with the rainy season, or Aumeang, from October to March. However, due to changes in climate, the country has been experiencing extreme drought-like conditions even during the traditional rainy season.¹²

One of the key **operational disruption risks is from fire**. The risk of electrical fires at data centres is significant given the vast networks of cabling and electronic equipment used. So fire safety solutions are crucial considerations for those building and managing data centres. As the proposed data centre will be housed in either a small single-storey building or a containerised structure the OHS risk is considered very low with emergency egress in the event of a fire readily available.

There are a number of different ways of protecting a data centre from fire. Before deciding on the type of system required to protect a data centre, it's important to conduct a risk analysis to understand the needs of the organisation, the environment and the main risks. There are different considerations, such as whether the data centre provides a centralised or decentralised function with a diverse range of solutions.

One of the choices is between a water or gas solution. If gas, there are two options to consider: inert gas or halogenated gas. Alternatively there are two water-based options to consider - conventional sprinkler or water mist systems. Water mist will spray a fine high-pressure water mist into the burning area.¹³

¹² <https://www.unocha.org/office-pacific-islands/kiribati>

¹³ <https://datacenternews.asia/story/protecting-data-centres-from-fire-your-options>

7 Mitigation

7.1 Environmental and Social Mitigation Measures

Table 7.1 summarises the proposed environmental and social mitigation measures based on the impact assessment in Chapter 6.

Table 7.1 **Proposed Environmental and Social Mitigation Measures**

Project phase	Social and environmental impacts	Mitigation measure	Estimated costs	Implementation responsibility	Monitoring
Planning/design	Land access for NDC Bairiki option	NDC will be sited on land already leased by Government of Kiribati	Negligible	MICTTD	Proof of land ownership
	Health and safety risks for NDC workers	Adopt Health and Safety in Design principles: <ul style="list-style-type: none"> ensure that NDC fire suppression system design is suited for Kiribati conditions; adopt relevant building standards for NDC structures; 	Negligible (part of design cost)	NDC Supplier	Health and safety considerations included in design documents
	Flooding/inundation of NDC from poor placement or design	Include climate resilience considerations in selection of NDC site and design (e.g., raised concrete slab)	Negligible (part of design cost)	MICCTD	Climate resilience included in NDC design
Construction	Dust and noise generation	<ul style="list-style-type: none"> Notify adjacent landowners/land users of construction works Employ dust control measures where necessary (eg. wetting down) Restrict hours in which noisy activities may be completed 	Negligible	MICTTD/Contractor	Site inspections
	Community health and safety	<ul style="list-style-type: none"> Ensure construction site is adequately fenced to prevent access Deploy traffic control measures if necessary Include LMP in contractor safety plan Contractor to develop and implement Contractor Safety Plan LMP provisions incorporated in contract documents and worker code of conduct implemented Maintain effective and accessible Grievance Mechanism 	Include in contract price	Contractor	Contractor Safety Plan developed and implemented and LMP provisions incorporated into contract documents
	Worker safety	<ul style="list-style-type: none"> Contractor to prepare and implement Safety Management Plan for civil works prior to commencement of construction Approve Safety Management Plan and monitor implementation If suspected asbestos containing material is discovered during LAN deployment stop works and seek external expert advice Underground service (eg electricity) identification prior to commencement of works Maintain effective and accessible worker Grievance Mechanism 	Included in contract price	Contractor MICTTD MELAD	Contractor Safety Plan developed and implemented. Site inspection

Project phase	Social and environmental impacts	Mitigation measure	Estimated costs	Implementation responsibility	Monitoring
	Waste management	<ul style="list-style-type: none"> Contractor to develop and implement a contractor waste management plan (see Annexure C) 	Included in contract price	Contractor	Contractor waste management plan developed & implemented
		<ul style="list-style-type: none"> Any packaging material or other waste brought to Tarawa by NDC contractor to be removed from Kiribati at conclusion of works 			
		<ul style="list-style-type: none"> E-waste from obsolete IT equipment sent to MELAD Kaokimaange storage at Betio and then exported for recycling 	USD10,000	MELAD/MICTTD	
		<ul style="list-style-type: none"> Consider financing export of stockpiled e-waste under the project 	USD10,000	MICTTD	
Operations	Minor hydrocarbon spills	<ul style="list-style-type: none"> Hydrocarbons stored offsite 	Include in contract price	Contractor/	Spill clean up material available onsite, contractor safety management plan developed and implemented
		<ul style="list-style-type: none"> Contractor safety management plans includes spill response procedure 			
		<ul style="list-style-type: none"> Spill clean-up equipment available on site 			
	Water pollution	<ul style="list-style-type: none"> Install septic tank to manage sewage from NDC facilities No fuel storage on-site other than in generator fuel tank 	Included in contract price	Contractor/MICTTD	Septic tank installed
	Energy consumption	<ul style="list-style-type: none"> Power NDC with solar power via panels installed in building roof 	Included in contract price	MICTTD	Solar panels installed
	Waste management	<ul style="list-style-type: none"> E-waste from obsolete IT equipment sent to MELAD Kaokimaange storage at Betio and then exported for recycling 	USD5,000	MELAD/MICTTD	E-waste exported
	Government redundancies (Registry Clerks)	<ul style="list-style-type: none"> Ensure redundancies are undertaken in accordance with provisions of <i>Employment and Industrial Relations Code 2015</i> and consistent with <i>IFC Good Practice Note: Managing Retrenchment</i> 	TBD	Relevant Ministry and MEHR	Compliance with LMP
	Cyber crime, SEA/SH and harmful digital content	<ul style="list-style-type: none"> Implement <i>Cybercrime Act 2021</i> and <i>National Cyber Security Strategy 2021</i> Consult with SEA/SH service providers at national and island level during project start-up to establish reporting, referral and support mechanisms that are child and victim friendly Maintain effective and accessible stakeholder and worker Grievance Mechanisms 		MICTTD MICTTD/NGOs	SEA/SH service providers consulted

Project phase	Social and environmental impacts	Mitigation measure	Estimated costs	Implementation responsibility	Monitoring
	Potential exclusion of disadvantaged and vulnerable groups from digital services	<ul style="list-style-type: none"> Engagement with Government agencies and NGOs on a six monthly basis for providing information about development of digital services and seeking feedback on use of digital services and obstacles to use. Digital awareness and literacy training for local island councils (through KILGA) and NGOs representing disadvantaged/vulnerable groups (through KANGO). 			

8 Implementation

The institutional arrangements will build on the implementation arrangements of the ongoing Kiribati Connectivity Project (P159632), by using the same Project Implementation Unit (PMU) and involving the same implementing agencies, notably the MICTTD with other stakeholders including the Communications Commission of Kiribati (CCK), the Ministry of Justice (MOJ), the state-owned cable operator (BNL), together with the Ministry of Finance and Economic Development (MFED). The Kiribati Connectivity Project's safeguards performance rating is currently satisfactory.

Environment and social risk management will be supported by the Kiribati Fiduciary Services Unit (KFSU), which is a central unit previously established to provide support to World Bank-funded projects. The KFSU is based within the Ministry of Finance and Economic Development (MFED) who will provide financial management, procurement, environmental and social risk management, and monitoring and evaluation oversight and support to the Project. The KFSU has engaged a local social specialist and is in the process of engaging an environmental officer and an international environmental and social specialist. The Terms of Reference for these positions are included in Annexure E.

MICTTD (via the PMU) will have overall responsibility for implementing the ESMP and ensuring contractor compliance during the construction phase, with assistance from KFSU as required. Existing capacity within MICTTD for managing environmental and social risks is low; however environmental risks are similarly low and assistance is available through KFSU. Capacity for managing social risks associated with digital government is very limited as this is a new initiative. Hence the project design includes capacity building measures (eg. international advisors) to assist GoK in managing these implementation risks.

Relevant elements of this ESMP will be incorporated in bidding documents for the NDC construction contractor and compliance monitoring of implementation will be overseen by MICTTD with technical assistance from KFSU. If necessary, the ESMP will be updated to reflect emerging or unanticipated environmental and social risks.

Annexure A

Labour Management Procedures

OVERVIEW OF LABOR USE ON THE PROJECT

The project will be implemented by the Ministry of Information, Communications, Transport and Tourism Development (MICTTD). The Ministry and Project Management Unit (PMU) will be responsible for carrying out the day-to-day management and implementation of the project, coordination with other government ministries and stakeholders on all aspects of project implementation, as required, and procurement.

The PMU will be staffed with a core team with expertise in project management, procurement, financial management, environment and social risk management, and monitoring and evaluation as stated above. Individual consultants with specific skill sets will be recruited to provide support to the PMU as needed. Pending recruitment of the PMU the project will be managed on an interim basis by existing MICTTD staff and by staff on an existing World Bank financed project in Kiribati.

A Project Operational Manual (POM) will be developed to describe detailed arrangements and procedures for the implementation of the project, such as the responsibilities of the different departments within MICTTD; operational systems and procedures; project organizational structure; finance and accounting procedures (including funds flow and disbursement arrangements); procurement procedures, personal data collection and processing in accordance with good international practice; and implementation arrangements for the Environmental and Social Commitment Plan (ESCP) as well as the implementation of instruments referred to in the ESCP.

Project Manager

The PMU consists of a Program Manager, supported by one international Environmental, Social and Health and Safety (ESHS) Specialist and two full-time national E&S Specialists (one Environmental Specialist and one Social Specialist). The international ESHS specialist and national E&S specialists will develop and support implementation of the project's environmental, social, health and safety, and community engagement instruments in compliance with local legislation, good international industry practice (GIIP), including WHO Guidance on COVID-19 and the WB Environmental and Social Framework (ESF).

National Environmental Specialist and Social Specialist

Two full-time national E&S Specialists (one Environmental Specialist and one Social Specialist) will be employed in Kiribati Fiduciary Services Unit (KFSU) and reporting to the Ministry of Finance and Economic Development (MFED), as part of the COVID-19 Response PMU to ensure that project environmental, social, and health and safety risks are managed in accordance with the requirements of the World Bank's ESF, WHO Guidance on COVID-19, and Kiribati legislation.

Specifically, the national E&S Specialists will:

- Manage the overall implementation of the World Bank environmental and social policies across the World Bank's Kiribati portfolio.
- Report to all project management on progress, coordination, activities management plan, status of activities, human resource deployment plan etc. to ensure appropriate coordination among the Projects as well as tasks within each Project.
- Attend World Bank missions, field trips, meetings etc. as required.
- Prepare environmental and social assessment and management instruments for consistency with World Bank policy and Kiribati legislation.
- Follow the Kiribati Environmental License process to identify what licenses are required and then prepare the appropriate applications and documents (EIA etc.).
- Ensure project-level citizen and stakeholder engagement and disclosure processes to ensure World Bank policy and community expectations are met.

- Implement the Grievance Mechanism (GM). Assist with resolving difficult grievances that cannot be resolved by the IAs.
- Preparation of monthly and six-monthly monitoring reports on the environmental, social, health and safety (ESHS) performance of the project.
- Develop and maintain a capacity building plan for the Kiribati portfolio. Provide ongoing training, awareness raising, on the World Bank ESF to MICCTD PMU.
- Review and contribute to TOR for technical assistance, Supervising Engineers and other specialists engaged by projects ensuring the E&S risk management instruments and World Bank ESF are adequately covered, as necessary.
- Managing the environmental and social requirements of project consultants and contractors including Civil Works Contractors.
- Provide support and training for Civil Works Contractors to prepare construction waste management and health and safety plans. Review and approve contractor's waste management and health and safety plans.
- Managing environmental and social risks in procurement
- Conduct other ESHS and CE related activities as required.

The project will require contractors to install a data center, servers and other hardware or equipment. The project will also hire technical consultants for technical assistance and support. Workers are likely to be direct employees or contractors; there is no expectation of community workers. Civil servants working in the project management unit will remain subject to the terms and conditions of their existing sector employment. Additional staff will be hired to support the project and they will be subject to the full requirements of ESS2, including appropriate terms and conditions of employment, non-discrimination and equal opportunity (which includes a safe work environment free from violence and sexual harassment), workers' organizations, restrictions on child and forced labor, and occupational health and safety. Likewise, any technical consultants contracted by the project will also need to adhere to such standards.

TYPES OF WORKERS

The proposed Project will support key focus areas outlined in Kiribati's Digital Government Master Plan (2021), notably on Governance, Technical Infrastructure for digital government, and e-Government Applications. The project will:

- support the development and strengthening of a Digital Transformation Office (DTO) for sustainable digital government coordination and implementation;
- provide upstream enabling legal, regulatory, institutional support and capacity-building necessary for the foundations for digital government and digital economy in Kiribati;
- finance infrastructure for e-government including construction of a National Data Centre (NDC);
- support the development of a Digital National ID system, a Civil Registration System, and the linkage between the two systems; and
- support the development and scaling up of a national government portal consisting of a single window to facilitate citizen and business access to public information, interactions and transactions with Government ministries and agencies.

The types of workers involved in these activities include:

- contractors and workers for the NDC construction and installation of other ICT equipment at Government offices;
- international technical consultants for technical assistance and support; and

- existing civil servants assigned to various activities under the Project.

The project is not expected to have primary supply workers that would fall under the definition of primary supply workers in ESS2 Footnote 5 (“*Primary suppliers* are those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project.”). The civil works for the project will be limited to the installation of the National Data Center (NDC); and there will only be one-off purchasing of equipment for the NDC. It is not expected that there will be suppliers who provide goods or materials on an ongoing basis.

There is no expected requirement for community workers.

The government currently employs 95 Registry Clerks who handle paperwork registries for the government. As a result of digitization of public services, many of these positions will become progressively redundant. The timing of redundancies is not clear, since these staff will be part of the digitization process in the initial phases, scanning documents and updating records in digital systems. While these job types will become redundant it is likely that some workers in each Ministry can be trained and reassigned to roles required to support digital government. Guiding principles for retrenchment are described in Annex B as part of this LMP.

At the time of the preparation of the LMP, exact labour needs cannot be estimated. The detailed labour needs will be described in the subsequent revised Labor Management Plan. However, the types of workers to be involved in project activities, listed above, are described in more detail below:

Direct Workers

Two types of direct workers will be employed by the Project: Direct Workers – Government and Direct Workers – Other.

- Direct workers – Government workers who are public servants employed by the MICTTD and other Government agencies who will be involved in Project implementation. The number of government staff involved in Project implementation is not known yet. They will remain subject to the terms and conditions of their existing public sector employment agreement. They will, however, be covered by project measures to address OHS issues (ESS2 paragraphs 24 to 30), and measures to protect the workforce in terms of child labour and forced labour (ESS 2 paragraphs 17 to 20).
- Direct workers - Other are those employed as full and part-time consultants by under the project. This category will comprise the international technical consultants for technical assistance and support, and national E&S Specialists recruited for the project and maintained throughout project implementation. Other experts/consultants will be hired on demand basis throughout the project period.

Contracted Workers

The project will require contractors to install a data center, servers and other hardware or equipment. Contracted labour requirements and numbers are not likely to be fully determined until the project implementation phase commences however. Contracted staff will be subject to the LMP. Contractors will also be required to ensure that any subcontractors also adhere to the LMP.

ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The overall labor risks associated with project activities are considered low given the small external workforces involved, limited civil works (which are low health and safety hazard), and that many project workers will be reassigned from the existing civil service.

Depending on the NDC option chosen the OHS risks associated with construction activities are very low (eg. installation of server racks in the cable landing station) to low (construction of concrete slab and installation of containerized data centre). Civil servants working on the project will not be exposed to OHS hazards different to their existing employment. No significant fire hazards are expected during construction. Fire hazards during operation of the data center are even lower.

Overall, labor risks are expected to be standardized, small and manageable. These are summarized below:

Project Activity	Key Labour Risks
Civil works and/or construction works	<ul style="list-style-type: none"> • Terms of employment (employment period, remuneration, tax, and insurance payments etc.) are not secured by contractual agreements. • Workers suffer discrimination and lack of equal opportunity in employment. • Risks of workplace accidents, particularly when operating construction equipment • Risks from exposure to hazardous substances (dust, cement, chemicals used in construction etc.) • Accidents or emergencies (OHS) • Sexual Exploitation and Abuse (SEA)
Transportation of construction materials, equipment	<ul style="list-style-type: none"> • Road traffic accidents expose workers and local communities to hazardous materials (OHS) • Risks of accidents when handling heavy equipment

BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

Labour in Kiribati is regulated through the *Constitution of Kiribati* and the *Employment and Industrial Relations Code 2015* (EIRC). The Constitution was adopted at independence in 1979 and contains several relevant articles. It guarantees protection from slavery and forced labour, protection of freedom of assembly and association, and freedom from discrimination on grounds of race, place of origin, political opinion, colour or creed (without reference to gender, sexual orientation, marital status, or disability). The (EIRC) is Kiribati's main piece of labour legislation. ILO provided assistance in developing the new labour legislation which repealed the Employment Ordinance (1977), Industrial Relations Act (1988) and the Trade Union and Employer Organisations Act. The EIRC aligns with the eight ILO Fundamental Conventions:

- C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948
- C098 - Right to Organise and Collective Bargaining Convention, 1949
- C029 - Forced Labour Convention, 1930
- C105 - Abolition of Forced Labour Convention, 1957
- C138 - Minimum Age Convention, 1973
- C182 - Worst Forms of Child Labour Convention, 1999
- C100 - Equal Remuneration Convention, 1951
- C111 - Discrimination (Employment and Occupation) Convention, 1958

and the *Tripartite Consultation (International Labour Standards) Convention 1976 (C144)* and *Seafarers' Identity Documents Convention 2003 (C185)* which Kiribati has ratified.

In 2013, Kiribati established the Ministry for Women, Youth, Sports and Social Affairs and, in 2014, set up the Kiribati National Human Rights Taskforce composed of representatives of key ministries and non-governmental organizations. The Ministry of Justice oversaw the implementation of Kiribati commitments under international human rights treaties.

The Gender Equality and Women's Development Policy 2019-2022 prioritizes gender mainstreaming, women's economic empowerment, leadership and decision-making, and the elimination of sexual and gender-based violence. While national legislation prohibits discrimination in employment, and external agencies have reported few cases of discrimination in employment and wages, cultural barriers may continue to impede women from playing a more active role in the economy.

Termination Procedures

Termination procedures are stipulated in EIRC (Art. 98-106), including what constitutes valid and unlawful reasons for termination and redundancies, required procedures regarding the notice of termination, termination payments and other employer obligations. The only valid reasons for the termination of contracts relate to employees' capacity or conduct in employment, and to employers' reduced operational requirements. Employees and their representatives have to be notified of terminations due to redundancies. The notice period for redundancy dismissals is stipulated in the EIRC and depends on the duration of employment. The EIRC provisions for termination and redundancy are consistent with the international labour standards (ILS) adopted by Kiribati and with ESS2 requirements.

BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

The Kiribati *Occupational Health and Safety Act 2015* is designed to ensure implementation of the Occupational Safety and Health Convention 1981, the 2002 Protocol on Occupational Safety and Health, and the Promotional Framework for Occupational Safety and Health Convention 2008. The 2015 Occupational Health and Safety Act established the country's first comprehensive framework for occupational safety and health standards for the workplace. The Ministry of Labor and Human Resources Development is responsible for enforcing the standards, although lack of qualified personnel may hamper the Ministry's ability to enforce employment law. Employers are liable for the expenses of workers injured on the job. By law workers may remove themselves from situations that endanger their health or safety without threat to their employment.

RESPONSIBLE STAFF

The PMU Project Manager will ensure that contractors are aware of, and comply with, labour management and OSH policies and procedures outlined in this LMP. Each contractor will be required to submit an assessment of environmental and social risks (including labour risks) associated with their activities and risk mitigation measures in accordance with the project's environmental and social requirements.

Project Management

The MICTTD will be responsible for project management, implementation and coordination with other government ministries and stakeholders. The Project Manager will lead day-to-day Project management and implementation, supported by the KFSU international ESHS Specialist and two full-time national E&S Specialists (one Environmental Specialist and one Social Specialist). The Project Manager, with support of the KFSU international ESHS specialist and national E&S Specialists, will be responsible for the following within their responsibility area:

- Implementing this LMP;
- Ensuring that contractors comply with this LMP;
- Monitoring to verify that contractors meet labour and OHS obligations toward contracted workers as required by national legislation and ESS2;
- Monitoring contractors' implementation of this LMP;
- Monitoring compliance with OHS standards at all workplaces in line with the national OHS legislation;
- Monitoring and implementing training on LMP, OHS and mitigating the spread of COVID-19 for project workers;
- Ensuring that the grievance mechanism for project workers is established and implemented and that workers are informed of its purpose and operation; and
- Have a system for regular monitoring and reporting on labour and occupational safety and health performance; and data collection, monitoring, and analysis of the LMP as part of the project's M&E activity.

TERMS AND CONDITIONS OF EMPLOYMENT

Terms and conditions of direct workers are determined by their individual contracts. Permanent project staff will have individual agreements (labour contract or service contract) with fixed monthly wage rates. Recruitment procedures will be documented and filed in accordance with the requirements of national labour legislation and the ESS2. A standard forty hours per week employment should be practiced. Requirements and conditions of overtime and leave entitlements are agreed as part of individual contracts.

The Project Manager will ensure that contractors are aware of, and comply with, labour management and OSH policies and procedures outlined in this LMP. Each contractor will be required to submit an assessment of environmental and social risks (including labour risks) associated with their activities and risk mitigation measures in accordance with the project's environmental and social requirements.

The project's labour requirements are outlined in the sections below.

Age of Employment

The minimum age of employment for this project will be 18 years. To ensure compliance, all employees will be required to produce a Tax Identification Number (TIN) as proof of their identity and age. Contractors and subcontractors will verify the ages of job applicants.

Occupational Health and Safety

The OHS measures of the project are based on the requirements of the relevant sections of ESS2 as well as WHO guidelines which will require compliance with the following provisions:

- Ensure workplace health and safety standards in full compliance with Kiribati law, ESS2 and WHO Guidelines and include:
 - Basic safety awareness training to be provided to all persons as well as on COVID-19 prevention and related measures.
 - All Project vehicle drivers to have appropriate licenses.
 - All workers to be equipped with all necessary PPE.
 - At least one supervisory staff trained in safety procedures to be always present when construction work is in progress.
 - Adequate hygiene facilities (toilets, hand-washing basins) and rest areas etc.
- Compliance with Kiribati legislation, WB's ESS2 requirements and other applicable requirements which relate to OHS hazards, including WHO specific COVID-19 guidelines.

- All workplace health and safety incidents to be properly recorded in a register detailing the type of incident, injury, people affected, time/place and actions taken.
- All workers (irrespective of contracts being full-time, part-time, temporary or casual) to be covered by insurance against occupational hazards and COVID-19, including ability to access medical care and take paid leave if they need to self-isolate as a result of contracting COVID-19.
- All work sites to identify potential hazards and actions to be taken in case of emergency.
- Any on-site accommodation to be safe and hygienic, including provision of an adequate supply of potable water, washing facilities, sanitation, accommodation, and cooking facilities.
- Laminated signs of relevant safe working procedures to be placed in a visible area on work sites, in local language and English.
- Fair and non-discriminatory employment practices.
- Under no circumstances will contractors, suppliers or sub-contractors engage forced labour.
- Construction materials to be procured only from suppliers able to certify that no forced labour or child labour has been used in production of the materials.
- All employees to be aware of their rights under the Labour Law, including the right to organize.
- All employees to be informed of their rights to submit a grievance through the Project Worker Grievance Mechanism. All employees to be provided training on appropriate behaviour with communities, gender-based violence and violence against children.

Project workers will receive OHS training at the start of their employment, and thereafter on a regular basis and when changes are made in the workplace, with records of the training kept on file. Training will cover the relevant aspects of OHS associated with daily work, including the ability to stop work without retaliation in situations of imminent danger (as set out in paragraph 27 of ESS2) and emergency arrangements.

All parties who employ or engage Project workers will actively collaborate and consult with Project workers in promoting understanding of, and methods for, implementation of OHS requirements, as well as in providing information to Project workers, training on occupational safety and health, and provision of personal protective equipment (PPE) without expense to the Project workers.

All OHS incidents will be recorded on the Safety Incidents Tracker form (Annexure C).

Sexual Exploitation and Abuse and Sexual Harassment

Kiribati ratified the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) in 2004. By ratifying CEDAW, it has made a commitment to ensure that the principles of equality are adhered to and that discriminatory practices including SEA and SH are abolished. Provisions to prevent SEA and SH are included in the Code of Conduct for Project staff and for contracted workers in line with relevant international standards and national legislation. Guidelines for a Code of Conduct is provided in Annex A of this LMP.

GRIEVANCE MECHANISM

All project workers will have access to a project specific Workers' Grievance Mechanism (WGM) consistent with ESS2 will be established and maintained to raise workplace concerns.

Workers will be informed of the grievance mechanism at the time of recruitment. The WGM will be easily accessible and measures will be put in place to protect workers against reprisal for its use. The WGM can be used to raise workplace related concerns including about the terms of employment, rights at work, unsafe or unhealthy work situations and others. If the issue cannot be resolved at the workplace level within seven days, it will be escalated to the Project Management level where the national E&S Specialists will serve as Grievance Focal Point to file the grievances and appeals. The Grievance Focal Point will coordinate with relevant departments/organizations and

persons to address these grievances. The Project Manager will review the records monthly and report on the grievances, response time and resolution status in a quarterly report to the WB.

The WGM will operate as follows:

- The complainant may report their grievance in person, by phone, text message, mail, or email (including anonymously if required) to the contractor as the initial focal point for information and raising grievances. For complaints that are satisfactorily resolved at this stage, the incident and resultant resolution will be logged and reported to the Grievance Focal Point.
- If the complainant is not satisfied, the contractor will refer the aggrieved party to the Grievance Focal Point. The Focal Point will endeavor to address and resolve the complaint and inform the complainant in two weeks or less. For complaints that are satisfactorily resolved by the Focal Point, the incident and resultant resolution will be logged by the Focal Point. Where the complaint is not resolved, the Focal Point will refer to the Project Manager for further action or resolution.
- If the complaint remains unresolved or the complainant is dissatisfied with the outcome, the complainant may refer the matter to the appropriate legal or judicial authority, at the complainant's own expense. A decision of the Court will be final.

The grievance mechanism is not an alternative or substitute for the legal system for receiving and handling grievances and does not preclude access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures. While all employees always have the right to access the legal system, the purpose of establishing a grievance mechanism is to provide an accessible and practical means to mediate and seek appropriate solutions, wherever possible.

Serious and Sensitive Grievances

In case a worker experiences serious mistreatment such as sexual exploitation and abuse, sexual harassment, intimidation, other abuse, violence, discrimination or injustice in a context related to program activities, the worker may raise the case to the GM Focal Point by all available avenues. If the worker raises this to a contractor or another person, this person will immediately refer the case to the GM Focal Point and the PMU. The GM Focal Point will immediately investigate the case respecting confidentiality and anonymity of the person. The GM Focal Point may seek support from the KFSU Social Specialist. The GM Focal Point and the KFSU Social Specialist will receive training from a professional specialized in this area in investigating serious grievances, relevant laws and regulations, and WB standards.

Culturally sensitive and locally appropriate protocols and procedures for serious grievances will be developed jointly by the PMU GM Focal Point, the KFSU Social Specialist and the WB 60 days after project effectiveness, and will be included in training of MICTTD PMU staff and consultants to ensure that direct workers for the project are familiar with the protocols and procedures. The protocols and procedures should be based on the following principles:

- | |
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| <ul style="list-style-type: none">• All complaints received will be filed and kept confidential. For statistical purposes, cases will be anonymized and bundled to avoid identification of persons involved.• After reaching a solution to a case, the GM Focal Point will follow-up to ensure that the solutions are effective.• Criminal cases will be referred to the public prosecutor. |
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CONTRACTOR MANAGEMENT

Contractors are responsible for management of their workers or subcontracted workers in accordance with this LMP, which will be supervised by the Project Manager. Contractors will be responsible for the following:

- To obey requirements of the national legislation (and this LMP);
- Establish a Code of Conduct for all workers;
- Maintain records of recruitment and employment process of contracted workers;
- Communicate clearly job description and employment conditions to contracted workers;
- Provide workers with evidence of all payments made, including benefits and any valid deductions;
- Maintain records regarding labour conditions and workers engaged under the project, including contracts, registry of induction of workers including Code of Conduct, hours worked, remuneration and deductions (including overtime);
- Assign a designated safety officer, conducting training on and implementing OHS measures, recording safety incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases);
- Ensure no child or forced labour is involved in the project;
- Maintain records of training/induction dates, number of trainees, and topics.
- Implement the grievance mechanism for workers; and
- Establish a system for regular review and reporting on labour, and occupational safety and health performance.

This LMP may be updated to include additional details about the hired workforce of contractors including, as necessary.

Annex A. Guidelines for a Code of Conduct for direct workers and contracted workers

A satisfactory Code of Conduct will contain obligations on all direct and contracted workers (including sub-contractors and day workers) that are suitable to address the following issues, as a minimum. Additional obligations may be added to respond to particular concerns of the region, the location and the Project sector or to specific Project requirements. The Code of Conduct shall contain a statement that the term 'child'/'children' means any person(s) under the age of 18 years.

The issues to be addressed include:

1. Compliance with applicable laws, rules, and regulations
2. Compliance with applicable health and safety requirements to protect the local community (including vulnerable and disadvantaged groups), the Employer's and Project Manager's personnel, and the Contractor's personnel, including sub-contractors and day workers, (including wearing prescribed PPE, preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment)
3. The use of illegal substances
4. Non-Discrimination in dealing with the local community (including vulnerable and disadvantaged groups), the Employer's and Project Manager's personnel, and the Contractor's personnel, including sub-contractors and day workers (for example on the basis of family status, ethnicity, race, gender, religion, language, marital status, age, disability (physical and mental), sexual orientation, gender identity, political conviction or social, civic, or health status)
5. Sexual Harassment (for example to prohibit use of language or behavior, in particular towards women and/or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate)
6. Violence including sexual and/or gender-based violence (for example acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion, and deprivation of liberty)
7. Exploitation, including SEA (for example the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading behavior, exploitative behavior or abuse of power)
8. Protection of children (including prohibitions against sexual activity or abuse, or otherwise unacceptable behavior towards children, limiting interactions with children, and ensuring their safety in Project areas)
9. Sanitation requirements (for example, to ensure workers use specified sanitary facilities provided by their employer and not open areas)
10. Avoidance of conflicts of interest (such that benefits, contracts, or employment, or any sort of preferential treatment or favors, are not provided to any person with whom there is a financial, family, or personal connection)
11. Respecting reasonable work instructions (including regarding environmental and social norms)
12. Protection and proper use of property (for example, to prohibit theft, carelessness or waste)
13. Duty to report violations of this Code
14. Non retaliation against workers who report violations of the Code, if that report is made in good faith.

The Code of Conduct should be written in plain language and signed by each worker to indicate that they have:

- received a copy of the code;
- had the code explained to them;

- acknowledged that adherence to this Code of Conduct is a condition of employment; and
- understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.

A copy of the code shall be displayed in a location easily accessible to the community and Project affected people. It shall be provided in languages comprehensible to the local community, Contractor's personnel (including sub-contractors and day workers), Employer's and Project Manager's personnel, and affected persons.

Annex B. Guidelines for Retrenchment Management

These guidelines are based on the IFC Good Practice Note: Managing Retrenchment.

In the case that the project and the digitization of public services will result in retrenchment of public registry clerks, MICTTD will prepare a Retrenchment Plan in accordance with national law and the following guidelines, and to be reviewed and agreed upon with the World Bank.

- Sound retrenchment practices should be as transparent as possible. A good communications strategy and clear information will both enable the consultation process to run smoothly and make it much more likely that employees, their representatives and other stakeholders will be able to come up with alternatives to job losses or indicate ways in which the effects of job losses can be mitigated. Full and frank disclosure of information helps to avoid rumors and misinformation, which again can fuel low morale and lack of productivity in the workplace. A transparent process that engages key stakeholders early on decreases the likelihood of resistance to changes in the longer run.
- Ensure retrenchment is necessary and look for alternatives to job losses. Options to consider include: A freeze on new hiring and re-training of existing staff; reduction in hours worked by existing staff; internal transfers and redeployment; transfer of employees to third party organizations.
- Gather relevant information on workers' rights and obligations, workers' re-employability in the market, gender and age breakdown of workers to be retrenched and workers to be retrained.
- Begin consultations with key stakeholders, engage workers and worker organizations.
- Reach an agreement on nature of retrenchment and establish procedures to plan the numbers of workers who can be re-trained and re-deployed, determine a timeframe for implementation, develop criteria for workers who can be re-trained and workers who may need to be re-trenched, determine budgets for actions, including re-training, re-deployment, early retirement or job assistance.
- Summarize results of consultations and agreements in a Retrenchment Plan that is made publicly available to all.
- Ensure that workers are able to ask questions or submit grievances regarding the application of the Retrenchment Plan to them.
- Make any necessary payment and carry out planned actions (re-training/re-deployment) in a timely and transparent manner.

Annex C. Health and Safety Incident Tracker

Incident Class

Class 1	Class 2	Class 3
Minor consequence: no one was seriously injured or near miss	Moderate consequence: injury requiring first aid treatment and time off work	Major consequence: serious injury (causing long-term impairment) or fatality)

Ref no.	Date	Incident Class	Description	Incident Cause	Action required	Due date	Responsibility	Status
001								Open
002								Closed
etc.								etc.

Annexure B

Stakeholder Engagement Plan

1. Introduction

The Kiribati Digital Government Project (KDGP) will be implemented by the Ministry of Information, Communications, Transport and Tourism Development (MICTTD). MICTTD will implement the project in all of Kiribati's 22 inhabited islands. The KDGP has five components, with differing stakeholders:

Component 1. Support the development and strengthening of a Digital Transformation Office (DTO) for sustainable digital government coordination and implementation and provide upstream enabling legal, regulatory, institutional support and capacity-building necessary for the foundations for digital government and digital economy in Kiribati;

Component 2. Finance infrastructure for e-government and install a National Data Center (NDC);

Component 3. Support the development of a Digital National ID system, a Civil Registration System, and the linkage between the two systems;

Component 4. Support the development and scaling up of a national government portal consisting of a single window to facilitate citizen and business access to public information, interactions and transactions with Government ministries and agencies; and

Component 5. Support the project management unit.

Stakeholders for civil works activities: The only physical investment and construction under the project will take place under Sub-Component (ii), through the installation of a National Data Center in South Tarawa, co-located with the cable landing station or in Bairiki village, the administrative capital of South Tarawa. The civil works will have a small footprint. This component will have limited stakeholders that are geographically concentrated around the civil works site.

Stakeholders for establishing digital government services: The other four components will support the establishment of a government unit for digital government coordination; provide institutional and capacity building support for a functioning digital government; support the development of a Digital ID system; and support the development of a government portal for citizen and business information and transactions with government ministries and agencies. These components have a much larger base of stakeholders including all government agencies, local government agencies, civil society organizations, and all inhabitants of Kiribati, including potentially disadvantaged/vulnerable groups.

These groups of stakeholders are listed separately in this Stakeholder Engagement Plan, as needs and mechanisms for engagement will be different for these activities and stakeholders.

The Kiribati Digital Government Master Plan, which is a framework document guiding the Kiribati Government for the development of digital government services, recognises that stakeholder engagement is fundamental to successful implementation of digital governance and the importance of a citizen-centred and service-oriented state to make sure that various organisations and information systems across the government are able and willing to work together and exchange information.

The Project Management Unit (PMU) established for the ongoing Kiribati Connectivity Project (P159632) will be responsible for KDGP and involve the same implementing and support agencies: MICTTD, Communications Commission of Kiribati (CCK), Ministry of Justice (MOJ), the state-owned cable operator BwebwerikiNET Ltd (BNL), and the Ministry of Finance and Economic Development (MFED). The PMU's responsibilities will include:

- (a) administration of the Project, including the preparation of the annual work plan and budgets and preparation of the Project Operations Manual;
- (b) implementation of Project activities and achievement of Project results with support from the MICCTD technical departments;
- (c) coordination with other Government ministries and stakeholders on all aspects of Project implementation as required;
- (d) financial management, procurement, environment and social (E&S) risk management, and communication of all Project activities; and
- (e) the overall monitoring, evaluation and reporting of Project activities.

The PMU will be supported by the Kiribati Fiduciary Services Unit (KFSU) based within MFED which will provide Financial Management, Procurement, E&S, and Monitoring & Evaluation (M&E) oversight to the Project. The KFSU has engaged a social officer and is in the process of engaging an environmental officer both of whom are national specialists. Both positions will be supported by an international safeguards specialist. The KFSU has been established for some years and is therefore familiar with World Bank safeguards policies, however capacity building will be required for implementation of the World Bank Environmental and Social Framework (ESF) requirements.

2. Project Stakeholders

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

2.1 Affected Parties

Affected Parties comprise persons, groups and other entities 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. Affected parties will vary by project activities under different components.

Component 2 – Stakeholders for Civil Works Activities	
Public Sector	<ul style="list-style-type: none"> Ministry of Information, Communication, Transport and Tourism Development (MICTTD) Communications Commission of Kiribati (CCK) BwebwerikiNET Ltd (BNL) Ministry of Environment, Lands and Agriculture Development (MELAD)
Kiribati Residents/Individuals	<ul style="list-style-type: none"> Any land owners/users on proposed NDC site Any land owners/users adjacent to NDC site Surrounding communities / road users impacted by construction Construction workers working on physical infrastructure
Private Sector	<ul style="list-style-type: none"> Private contractors who may bid to provide services
Components 1, 3, 4, 5 – Stakeholders for Establishment of Digital Government Services	
Public Sector	<ul style="list-style-type: none"> Ministry of Information, Communication, Transport and Tourism Development (MICTTD) Communications Commission of Kiribati (CCK) BwebwerikiNET Ltd (BNL) Office of the President (OB) Public Service Office (PSO) Kiribati Police Service and Prison (KPSP) Ministry of Foreign Affairs and Immigration (MFAI) Ministry of Fisheries and Marine Resources Development (MFMRD) Ministry of Internal Affairs (MIA) Ministry of Finance and Economic Development (MFED) Ministry of Labour and Human Resources Development (MLHRD) Ministry of Public Works and Utilities (MPWU) Ministry of Communications, Transport and Tourism Development (MCTTD) Ministry of Health and Medical Services (MHMS) Ministry of Education (ME) Ministry of Commerce, Industry and Cooperatives (MCIC) Ministry of Environment, Lands and Agriculture Development (MELAD) Ministry of Line and Phoenix Islands Development (MLPID) Ministry of Women, Sports and Social Welfare (MWSSW) Office of the Attorney General (OAG) Island Councils Kiribati Local Government Association (KILGA) Civil servants employed as Registry Clerks in Government Ministries Urban and Island Councils

Civil Society	<ul style="list-style-type: none"> • Kiribati Local Government Association (KILGA) • Kiribati Association of Non-Governmental Organizations (KONGA) • Vulnerable people and related associations (Women's Associations such as RAK, AMAK, Catholic Women's Association. Te Toa Matoi Disability Organisation, etc.) • Other civil society organizations
Kiribati Residents/Individuals	<ul style="list-style-type: none"> • All Kiribati residents who can/need to use government digital services and will benefit from the project • Kiribati workers abroad who may need to access government digital services/send remittances • Vulnerable groups, such as women, elderly, remote populations, those with limited access to digital technology or coverage who may not be able to benefit from digital services in an equitable manner
Private Sector	<ul style="list-style-type: none"> • Businesses and business associations who will be using government digital services

2.2 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.

For Component 2 civil works activities, other interested parties may include:

- Civil society working on environmental issues
- Civil society working on community land rights

For the establishment of digital government services activities under the remaining components, other interested parties may include:

- Unimane¹⁴, as some of the new digital services may decrease reliance through their authority
- Local businesses and businesses with international links, even if not directly affected by the digital services
- Development partners working on digital initiatives and ICT infrastructure

2.3 Vulnerable Groups

The project identifies vulnerable groups as any persons or groups who may be disproportionately impacted or further disadvantaged by the project due to their vulnerable status, and who may require special engagement efforts to ensure their equal representation in project 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 basic digital services in their communities and available alternatives.

For Component 2 civil works activities, disadvantaged/vulnerable groups may include:

- Land owners or users whose are disadvantaged in existing hierarchy and decision-making mechanisms (for example, if communal land is owned by multiple peoples and women/youth have less say in what happens to land)

¹⁴ A traditional council of elder males who oversee village and island affairs. They are still considered a relevant authority in some outer islands.

- People living in communities adjacent to construction site who may be disproportionately vulnerable to dust, disruption in traffic
- Any workers who may be discriminated based on gender, age, disability among other factors

For the establishment of digital government services activities under the remaining components, disadvantaged/vulnerable groups will be those who are less able to benefit from project benefits due to difficulty accessing digital technology or connectivity, mobile phones or networks, such as:

- Illiterate individuals
- Elderly
- Remote populations
- Poorer households
- People with certain disabilities

Gender may be a cross-cutting vulnerability together with above factors. However, if access to digital government services is increased for such vulnerable groups, this can also be an opportunity to take away barriers that create the vulnerabilities. This includes allowing women to directly access government services such as social protection, obtaining licenses, registering property, and starting a business online from home. Access to centralized services, for all people, but especially women with dependents, the disabled, and the elderly is complicated due to increasing weather events and projected risks of travelling from outside of Tarawa due to climate change.

In addition, risks associated with increased connectivity and provision of public services through digital means may include cyber-bullying, addiction and exposure to illicit material. Groups that are more likely to be exposed to these risks (youth) will be considered vulnerable as well.

2.4 Stakeholder Needs

The following table lists the various stakeholder groups, their key characteristics and particular communication methods and needs.

Community	Stakeholder Group	Key Characteristics	Preferred means of notification	Language and special needs
Outer Islands	Local Government - <i>Unimwane</i> , / - Island Council and CBOs	Low level of access to technology (Varies by island and proximity to South Tarawa and/or Kiritimati Island)	Via phone and e-mail using local island councils, KILGA as intermediaries where needed due to access	i-Kiribati
	General Public	Low level of access to technology (Varies by island and proximity to South	@ Maneaba via Island Council Radio Announcements	i-Kiribati

		Tarawa and/or Kiritimati Island		
	Vulnerable Groups	<p>Low level of access to technology</p> <p>(Varies by island and proximity to South Tarawa and/or Kiritimati Island)</p> <p>Women and Youth will need separate meetings to ensure voice and participation.</p> <p>People with Disabilities may need support to access information and/or physical access to Maneaba. Accommodations should be made on a case-by-case basis.</p> <p>Individuals with low or no literacy may need face-to-face assistance where required. Where possible, low-literacy materials should be designed and distributed or posted in visible areas</p>	<p>Women: @ Maneaba and Island Council in separate meetings</p> <p>Youth: @ Maneaba and Island Council in separate meetings</p> <p>People with Disabilities: on a case-by-case basis, @ Maneaba and Island Council in separate meetings or</p> <p>Face-to-face at their domicile</p> <p>Individuals with low or no literacy @ Maneaba and Island Council</p> <p>General Information and announcements can be delivered via Radio</p>	i-Kiribati
South Tarawa	<ul style="list-style-type: none"> -Government -International NGOs -Development Partners -Local NGOs - General Public 	High level of access to technology, internet, social media print and radio	<p>Primary: Via phone and e-mail</p> <p>Secondary: via social media, social media messaging tools, radio, print media</p>	<p>i-Kiribati for local NGOs and General Public</p> <p>English for all other</p>

3. Consultation During Master Plan Development and Project Preparation

3.1 Master Plan

The Digital Government Master Plan was prepared with the assistance of e-Governance Academy Foundation (eGA) an e-governance and digital transformation non-government organisation (NGO). The Government identified a wide network of stakeholders and included them in consultations in the preparation of the Master Plan during 2020 and early 2021. The eGA methodology involved:

- an e-Governance questionnaire mapping the existing digital governance situation in Kiribati; and
- expert missions and face-to-face meetings with key stakeholders.

The key findings of this consultation can be summarised as follows:

- horizontal coordination of e-government planning is absent. Each Ministry has its own ICT department, reporting only to the relevant Ministers and Secretaries;
- ICT staff of the ministries and other government institutions is limited and focusing mainly on hardware and local network maintenance. There is a lack of ICT staff able to develop and maintain software solutions;
- National databases are mostly in digital format and unique identifiers for citizens have been introduced by Ministry of Justice, although other Ministries do not use these identifiers;
- there are almost no government-wide digital solutions available. Government e-mail addresses are used only sporadically with gmail and yahoo preferred;

The SEP will be publicly disclosed on the MICTTD website in November 2021 as part of the Environmental and Social Management Plan (ESMP). Any significant changes to these instruments will require redisclosure and consultation during the project implementation period.

3.2 Project Preparation

The project has been consultative in its design, incorporating inputs from various stakeholders in government, the private sector, and civil society organizations.

For the environmental and social management documents, MICTTD facilitated a virtual consultation meeting with key stakeholders on 19 October 2021 to explain the content of the draft environmental and social instruments – Preliminary ESMP, LMP and SEP. The stakeholder engagement session was chaired by MICTTD with the following ministries represented:

- Ministry of Environment, Lands and Agriculture Development (MELAD);
- Ministry of Infrastructure and Sustainable Energy (MISE);
- Ministry of Women, Youth, Sport and Social Affairs (MWYSSA);
- Ministry of Employment and Human Resources (MEHR); and
- Ministry of Finance and Economic Development (MFED) via Kiribati Fiduciary Services Unit (KFSU).

Similarly, an engagement session with civil society was held on 28 October 2021 and included representatives from:

- Kiribati Association of Non-Governmental Organisations (KANGO) (a collective of civil society organizations with more than 40 member organizations),
- ChildFund,

- Red Cross, and
- Kiribati Climate Action Network (KiriCAN).

Meeting attendees did not raise any particular concerns in relation to project design but welcomed the commitment to ongoing dialogue with civil society organisations.

4. Stakeholder Engagement Program for Project Implementation

4.1 Stakeholder Engagement Objectives and Methods described in the Master Plan

The Kiribati Digital Government Master Plan already includes a series of stakeholder engagement approaches, initiatives, engagement policies and programs as part of an ongoing effort in, covering the activities and principles below. The SEP for this project will be based on this existing Master Plan and its approach to stakeholder engagement. The Master Plan includes:

- creation of a “Digital Kiribati” digital government development story that gives every participant a concrete and joint vision to follow;
- communication should be as simple (understandable) and practical as possible with messaging clearly connected to the benefits that citizens, businesses and the State will receive from digital governance;
- building trust through spokespersons and opinion leaders being open and precise in public communications and not over-promising;
- popularising digital government among citizens through Government leaders leading by example in using digital government tools (e.g. using public appearances in media to talk about how they use e-services, what measures they take to securely browse the internet, etc.);
- making government communication mobile-friendly;
- ministries and agencies should be active in electronic communication, promoting the possibility of communication by email, and replying in timely fashion to online requests;
- ensuring that all Government e-services for citizens and government web-sites can be found by search engines using SEO (Search Engine Optimisation);
- providing information about recent developments and ICT education through national and regional media (TV, radio, newspapers);
- increasing digital awareness among the population and making digital government developments sustainable by training different target groups (eg. teachers, citizens, public officials) and also journalists so that they would know how to articulate digital government matters;
- making ICT knowledge part of the education system to raise a digitally-skilled young generation through inclusion in primary and secondary school curricula and facilitating tertiary education (including vocational training); and
- engaging partners from all sectors with the National Digital Transformation Advisory Board raising awareness amongst the private sector.

This SEP will be progressively updated during project implementation as an integral component of project design. As digital government is a new initiative for Kiribati it will be necessary that the SEP is developed iteratively to respond to emerging needs and issues of particular stakeholder groups.

4.2 Stakeholder Engagement Activities incorporated into Project Components

As the objective of the Project is to improve access to digital services for all, including disadvantaged/vulnerable groups, the project design includes a number of stakeholder engagement activities under different components. These are summarized below:

Component 1:

- *Digital Government Implementation Roadmap.* Subcomponent 1.2 will encompass technical assistance for the development and operationalization of a detailed implementation plan, building on the Kiribati Digital Government Masterplan (approved in 2021) and including stakeholder consultations and developing processes for implementation.

- *Legal and regulatory framework for Digital Government.* Activities here will span technical support and capacity building for establishing, modernizing and implementing the legal and regulatory frameworks, and institutional and data governance arrangements, needed to support digital government and the digital economy, particularly cybersecurity, cybercrime, data protection, consumer protection, digital ID, e-signatures, digital transactions, e-commerce and Netsafe principles and practices.
- *Government Cyber Security Program.* The subcomponent will furthermore encompass technical assistance and capacity building for the development of operational and administrative standards, assurance, monitoring, audit, and Cyber-Security Emergency Response Team (CERT) capabilities. The Cyber Security Program will include comprehensive security training and awareness programs for all government users, government IT and security professionals, management, citizens, and private sector stakeholders.

Component 4:

- *Digital Citizen Engagement.* To build public trust in digital government through increased transparency and accountability, this subcomponent will support technical enhancements to the national portal that enable online citizen participation and two-way interaction between government and citizens. These will include multi-channel mechanisms for citizens and businesses to inquire and provide feedback on digital services (including via contact forms, ratings, comments, suggestions, etc.), with provision for anonymous feedback as practicable. Provision will be made to promote universal access including for persons with disabilities. To close the feedback loop with citizens, the project will support technical assistance and business process (re-) engineering to permit government to periodically report on service improvements undertaken in response to citizen feedback, and to regularly publish engagement statistics and performance for digital services, disaggregating by gender and other factors as applicable. The project will explore further opportunities for leveraging the national portal and multi-channel mechanisms to promote citizen participation, particularly in coordination with Island Councils and CSOs.

Component 5:

- *Grievance Redress Mechanism (GRM):* Technical assistance will be provided to support the development of a Grievance Redress Mechanism, with requisite policies, protocols, and adequate staffing for receiving and responding to inquiries, feedback, and complaints on the project within established standards.
- *Communications and Outreach:* The project will also support the coordination and undertaking of communications and outreach activities to raise awareness on project interventions and the Government's broader digital transformation agenda. Outreach efforts will prioritize activities to encourage buy-in and uptake of digital services, particularly with women, the elderly, the disabled, and Outer Island residents. To promote knowledge of safety practices and counter target harmful online communication, outreach activities will also aim to raise awareness and improve digital literacy on issues such as online safety, data protection, respectful communication, and address risks of bullying and harassment especially for women and girls. As part of outreach and capacity-building efforts, the project will capitalize and strengthen existing multi-stakeholder networks such as the Child Online Protection Working Group (COPWG) established as part of the implementation of the National Cybersecurity Strategy, to ensure targeted capacity-building on cyber safety and protecting against harmful online activities such as grooming and cyber harassment that affect vulnerable groups such as children and girls. Strengthening coordination mechanisms between the DTO (under which the CERT will be housed) and the Ministry of Women, Youth, Sports and Social Affairs (MYWSSA) will be critical in ensuring targeted outreach.
- *Beneficiary Feedback Surveys:* Finally, this component will support a survey of users of the national portal and digital services developed under Component 4 to gauge satisfaction with these. Survey results will be disaggregated by gender, age, and other factors. Survey results are anticipated to inform government decision-making for improving digital service delivery.

In addition, project interventions are designed to promote women's economic empowerment and reduce gender gaps in women's access to services, including healthcare, social protection, education, asset management, and financial services. Kiribati's National Policy on Gender Equality and Women's Development 2019-2022 underlines several barriers women face in accessing services and participating in income-

generating activities, notably time spent on domestic work and church activities. Prevalence rates of gender-based violence (GBV) in Kiribati are also strikingly elevated and amongst the highest in the region, with 68 percent of women aged 15-49 who have been in a domestic partnership having experienced physical or sexual violence. While there are no gender disparities in the coverage of the national ID system, project interventions to strengthen the national ID system, develop a digital ID system, and digitally avail public services via the national portal would allow women to directly access government services such as social protection, obtaining licenses, registering property, and starting a business online from home. This would provide women with greater agency to develop human, financial, and physical capital. Specific project actions directed at closing gender gaps include i) a Gender Diagnostic to assess barriers faced by women in accessing ID and public services; ii) an emphasis on the provision of digital services via the national portal that enhance women's access to crisis and health services, including GBV support services; and iii) promoting women's uptake of digital services through dedicated outreach, including communication activities aimed at raising awareness on issues such as online safety particularly for women and girls. The project will monitor progress on the closing of gender gaps through indicators to i) ensure the Gender Diagnostic is completed, with recommendations to be incorporated in the design of ID systems and the national portal; and ii) measure the percentage of digital service users who are women. Project indicators will also provide gender-disaggregated data on the number of women with Digital IDs to inform policy-making

4.3 Stakeholder Engagement Methods under the SEP

Kiribati faces significant challenges in communication and outreach given its lack of reliable communications, distance, and adequate transportation between islands. Communications in South Tarawa are more reliable and comprehensive. In the outer islands, there are less available communications outlets and less reliability of internet and mobile phone systems. Therefore, engagement methods may vary according to the location of stakeholders.

- **Direct communication and in-person meetings.** While there are currently no identified cases of COVID-19 in Kiribati, certain preventative measures and restrictions, such as limitation of travel, are in place to ensure that the country remains free of COVID-19. Some in-person meetings are being held in South Tarawa, and some can be held on the other islands, provided that information is sent to an intermediary by e-mail or other means.
- **E-mails** are the preferred method with local and national government of direct communication given time variations and convenience. This method of communication should be used in combination with other forms of direct communication in the outer islands due to possible connectivity issues. Local governments and island councils can be e-mailed pamphlets and other informative materials for print out on the outer islands.
- **Mass Media.** Through the Kiribati Broadcasting and Publication Authority, an SOE, Kiribati has one newspaper and one radio station that reaches all of Kiribati and operates out of Kiritimati and South Tarawa. Other newspapers are available only online.
- **Social Media.** MICCTD, with the support of an in-country WB consultant, will deliver social media updates throughout the design and implementation of the project. WhatsApp and Facebook are the preferred methods of social media interaction.
- **Written communication** materials such as brochures or flyers will be developed in i-Kiribati and English and disclosed to the public before the project activities begin and upon project completion to inform the public of new facilities and services.
- **Outer Islands Local Government and Civil Society Organizations.** Due to COVID-19, travel to the outer islands is possible but discouraged. The Kiribati Local Government Association (KILGA), housed under the Ministry of the Interior can supply information from South Tarawa to the respective Island Councils in order to disseminate print materials or other information. The Kiribati Association of Non-Governmental Organizations (KANGO) can liaise with civil society organizations across the different islands. The main purpose of engagement with stakeholders with this project will be as follows:

The stakeholder engagement matrices below are grouped into one matrix for stakeholder engagement for civil works activities on South Tarawa and another matrix for stakeholder engagement around establishing digital government services.

Component 2 – Stakeholder Engagement for Civil Works Activities

Project Stage	Target Stakeholders	Topics of engagement	Information to disclose	Location	Engagement Methods
Preparation	Public Sector: MICTTD, CCK, BNL, MELAD	-Consultations on project scope and rationale	-Environmental and Social Management Plan (ESMP) -Stakeholder Engagement Plan (SEP) - Labor Management Procedures (LMP) - Environmental and Social Commitment Plan (ESCP) Timing: Before appraisal.	South Tarawa	Small in-person meeting Internet based meeting
	Civil Society: Working on environmental issues, and working on community land rights	-Project E&S principles and management -Grievance mechanism process			
	Any land owners/users on selected NDC site		Environmental and Social Management Plan (ESMP) -Stakeholder Engagement Plan (SEP) - Labor Management Procedures (LMP) - Environmental and Social Commitment Plan (ESCP) Timing: When site selection is being finalized for NDC and during preparation of final ESMP and SEP.	South Tarawa	
	Surrounding communities/road users that can be impacted by construction	-Consultations on project scope and rationale			Small in-person meeting
	Civil Society: Working on environmental issues, and working on community land rights	-Project E&S principles -Grievance mechanism process			Internet based meeting
	Private contractors who may bid on civil works				
	Vulnerable groups:	- Project E&S principles	Environmental and Social Management Plan (ESMP) -Stakeholder Engagement Plan (SEP) - Labor Management Procedures (LMP)	South Tarawa	Small in-person meeting (gender sensitive)
	Any land owners/users/community members who may be	- Project land due diligence requirements			Internet based meeting (gender sensitive)

	disproportionately impacted by the civil works SEA/SH service providers in the area	- LMP and Code of Conduct -Grievance mechanism process	Timing: When site selection is being finalized for NDC and during preparation of final ESMP and SEP.		(possibly with facilitation of SEA/SH service providers)
Implementation	Contractor construction workers and	- Project E&S principles - LMP and Code of Conduct - SEA/SH -Grievance mechanism process for workers and stakeholders	Environmental and Social Management Plan (ESMP) -Stakeholder Engagement Plan (SEP) - Labor Management Procedures (LMP) - Accessible grievance redress materials - Code of Conduct Timing: Before civil works begin	South Tarawa	Small gatherings Email Written material Training modules
	All affected parties, interested parties and vulnerable groups listed above	-Project E&S principles -Grievance mechanism processes - Project progress	-Updated Project's ESF instruments -Feedback of project consultations - Information about the project's activities Timing: After civil works begin, periodically. Monthly for directly affected parties, three monthly for interested parties until the completion of civil works.	South Tarawa	Small gatherings Email Social media Written material (disaggregated by gender, organized with differently accessible materials for different groups)

Component 1, 3, 4, 5 – Stakeholder Engagement for Establishing Digital Governance Services

Project Stage	Target Stakeholder	Topic of engagement	Information to disclose	Location	Engagement Methods
Preparation	<p>All public sector affected parties listed in Section 2</p> <p>-Kiribati Local Government Association (KILGA)</p> <p>- Kiribati Association of Non-Governmental Organizations (KONGA)</p> <p>- Other civil society organizations</p>	<p>-Consultations on project scope and rationale</p> <p>-Project E&S principles</p> <p>-Grievance mechanism process</p>	<p>Environmental and Social Management Plan (ESMP)</p> <p>-Stakeholder Engagement Plan (SEP)</p> <p>- Labor Management Procedures (LMP)</p> <p>- Environmental and Social Commitment Plan (ESCP)</p> <p>Timing: Before appraisal.</p>	<p>South Tarawa</p> <p>Outer Islands</p>	<p>Small in-person gatherings</p> <p>Internet based meeting platforms</p> <p>Mass and social media</p> <p>Via MICTTD and Kiribati Island Local Government Association (KILGA)</p>
	<p>- All Kiribati residents who can/need to use government digital services and will benefit from the project</p> <p>- Kiribati workers abroad who may need to access government digital services/send remittances</p> <p>- Vulnerable groups, such as women, elderly, remote populations, those with limited access to digital technology or coverage who may not be able to benefit from digital services in an equitable manner</p> <p>- Associations for vulnerable groups (Women's Associations such as RAK, AMAK, Catholic Women's Association. Te Toa Matoa Disability Organisation, etc.)</p>	<p>-Project scope and rationale</p> <p>-Project E&S principles</p> <p>-Grievance mechanism process</p>	<p>Environmental and Social Management Plan (ESMP)</p> <p>-Stakeholder Engagement Plan (SEP)</p> <p>- Labor Management Procedures (LMP)</p> <p>- Environmental and Social Commitment Plan (ESCP)</p> <p>Timing: Before appraisal.</p>	<p>South Tarawa</p> <p>Outer Islands</p>	<p>Internet based meeting platforms</p> <p>Government websites</p> <p>Mass and social media</p> <p>Via MICTTD and KILGA</p>

Implementation	<ul style="list-style-type: none"> - All Kiribati residents who can/need to use government digital services and will benefit from the project - KILGA - KONGA -Associations representing vulnerable groups - Vulnerable groups 	<ul style="list-style-type: none"> - Equitable access to digital services - Barriers related to access for different disadvantaged/vulnerable groups 	<ul style="list-style-type: none"> - Project activities and progress - Government platforms/policies developed - Grievance mechanism processes <p>Timing: Regular update and feedback meetings every 6 month, trainings as digital platforms/policies are developed and ready for use.</p>	<p>South Tarawa</p> <p>Outer Islands</p>	<p>In person meetings</p> <p>Internet based meetings</p> <p>Mass and social media</p> <p>Specific media/radio campaigns</p> <p>Billboards for digital government services/learning opportunities</p> <p>Surveys</p> <p>Via MICTTD and Kiribati Island Local Government Association (KILGA)</p> <p>Trainings on digital awareness and literacy (including training of trainers)</p>
	<ul style="list-style-type: none"> - Women's organizations - Youth groups - Service providers for SEA/SH 	<ul style="list-style-type: none"> - Cyber bullying/cyber crimes - Government policies, complaints channels, effectiveness 	<ul style="list-style-type: none"> - Project activities and progress - Grievance mechanism processes <p>Timing: Every 6 months to seek feedback from organizations on the ground on whether there is an increase in negative impacts, if the government's policies and complaint channels for cyber-security work to resolve these</p>	<p>South Tarawa</p> <p>Outer Islands</p>	<p>In person meetings</p> <p>Internet based meetings</p> <p>Mass and social media</p> <p>Surveys</p> <p>Via MICTTD and Kiribati Island Local Government Association (KILGA) and KONGA</p>
	Businesses, business associations, chambers of commerce	<ul style="list-style-type: none"> - Project activities and progress, effectiveness of digital services and platforms 	<ul style="list-style-type: none"> - Project activities and progress - Government platforms/policies developed - Grievance mechanism processes <p>Timing: Every 6 months to seek feedback and provide updates; trainings as platforms/policies are developed and ready for us.</p>	<p>South Tarawa</p> <p>Outer Islands</p>	<p>In person meetings</p> <p>Internet based meetings</p> <p>Mass and social media</p> <p>Surveys</p> <p>Via MICTTD and Kiribati Island Local Government Association (KILGA)</p> <p>Trainings on digital awareness and literacy, digital platforms</p>

					for business users (including training of trainers)
	Other project interested Parties	- Project activities and progress, effectiveness of digital services and platforms	Project activities and progress - Government platforms/policies developed - Grievance mechanism processes Timing: Every 6 months	South Tarawa Outer Islands	Mass and social media Media briefings / information packages Government websites Indirect communications through Island Councils and MICTTD

Stakeholder engagement in South Tarawa will rely on a variety of methods. It is recommended to hold small- group sessions, focus groups and interviews. Other methods will include but are not limited to the publication of project information through **social media**: including MICTTD’ website and Facebook page, social media, and **mass media** via public service announcements through radio, and printed materials that can be distributed at the local level. Public information materials aimed at the general population will be translated to i-Kiribati. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders

Traditionally, consultations outside of South Tarawa take place in maneaba, a public house, where the local population discusses community issues. Kiribati Local Government Association has direct access to Island Councils in each of the outer islands and can support the PMU in the distribution of information materials. During implementation it will be important to maintain regular communication with Island Councils, particularly in the early stages of digital government roll-out. MICTTD should consider convening an Island Council Working Group that meets virtually on a monthly basis (initially) to allow efficient engagement with the outer islands and opportunities for sharing experiences.

A stakeholder representative group will be established on South Tarawa to allow collective engagement as the digital governance environment evolves. A monthly meeting frequency is likely warranted in the early stages of the roll-out with reduced meeting frequency as teething problems are resolved.

5. GRIEVANCE REDRESS MECHANISM

The project Grievance Mechanism (GM) will seek to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. It will provide a transparent and credible process for fair, effective, and lasting outcomes. It will also build trust and cooperation as an integral component of broader community consultation that facilitates corrective actions.

MICTTD has in existence an online platform, e-mail address and phone number on its website to receive feedback and complaints, with the details provided below:

Website: <https://www.micctd.gov.ki/webform/contact-us>

Phone number: (686) 75125401

This platform will be used and updated as needed to become one of the avenues for grievance redress for the project.

The general principles and procedures for the GM are described below. Within 30 days of effectiveness, the PMU will appoint a GM Focal Point, working under the supervision of the project manager, to coordinate and manage the GM for the Project. Within 30 days of appointment, the GM Focal Point will establish more detailed procedures for the management of grievances, to be reviewed by the Project Manager and the World Bank.

The general principles for the GM are as follows:

- The GM is expected to address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all project-affected parties, at no cost and without retribution.
- The mechanism, process or procedure will not prevent access to judicial or administrative remedies.
- MICTTD will inform the project-affected parties about the grievance process in the course of its stakeholder engagement activities, and will make publicly available a record documenting the responses to all grievances received.
- Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected parties
- The mechanism will also allow for anonymous complaints to be raised and addressed.
- The GM will include Different ways in which users can submit their grievances, which may include submissions in person, by phone, text message, mail, e-mail or via the MICTTD web site.
- The final procedures will include a log where grievances are registered in writing and maintained as a database (example included in Annex A).
- The final and publicly advertised procedures will set out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances submitted through different channels.
- The GM will have an appeal process to which unsatisfied grievances may be referred when resolution of grievance has not been achieved.

The general procedures for the GM are as follows:

Intake

- Grievances will be received at the central MICTTD level at headquarters in person, by mail, by e-mail and phone.
- At the outer islands, grievances will be received by local island councils and passed onto the MICTTD through the Kiribati Island Local Government Association (KILGA).
- People who submit grievances will be notified within 3 days of the receipt of their grievance, concern or feedback.

Processing, Resolution, Appeal

- For all grievances, the MICTTD GM Focal Point will complete a grievance intake and resolution form to guide the process (example included in Annex B).
- The MICTTD Focal Point will coordinate and work with other relevant stakeholders, such as the construction contractor, other Ministries or island councils, or persons to investigate and assess the grievance.
- After assessments of the grievance, the GM focal point will make a decision concluding: 1) No further action is required; 2) A certain action is required to redress the grievance; or 3) The grievance should be raised to a higher level.

- The GM Focal Point will use a log where grievances are registered in writing and maintained as a database (example included in Annex A). This database will have categories of grievances, so that the grievances, concerns and feedback are coded in categories. It will also include the initial decision of the GM Focal Point.
- In case of *no further action*, the GM Focal Point will communicate this to the person who submitted the grievance, using the channels initially used by them. This communication will include information that the person can appeal and ask for a review of their grievance from a higher level, or file a judicial complaint if this option is available under law.
- In case of *action required*, the GM Focal Point will communicate this to the person who submitted the grievance, using the channels initially used by them. This communication will include information that the person can appeal and ask for a review of their grievance from a higher level, or file a judicial complaint if this option is available under law. The GM Focal Point will coordinate and work with relevant stakeholders, institutions or entities for the action to happen. If a budget is required for the remedy, the GM Focal Point will communicate all such actions and required budget to the Project Manager.
- In case of *grievance raised to a higher level*, the GM Focal Point will communicate this to the person who submitted the grievance, using the channels initially used by them. This communication will include the process and the timing of the additional process.
- These grievances, as well as any grievances re-submitted for appeal, will be resolved by a group comprised of the MICTTD PMU Project Manager, the KFSU Environmental and Social Specialists, and a member of the island council for each island. The GM Focal Point will compile higher level and appeals grievances on a monthly basis and the group will meet once a month, as needed, to decide on these grievances.
- Once a decision is made, the GM Focal Point will communicate this to the person who submitted the grievance, using the channels initially used by them. This communication will include information that the person can file a judicial complaint if this option is available under law.

Monitoring, Reporting

- The GM Focal Point will compile grievances, response time, resolution time and grievance categories and report to the Project Manager on a monthly basis. The Project Manager will review the reporting and assign any additional budget that may be necessary for the effective management of the grievance mechanism.
- The PMU will include the above information on the grievance mechanism in their quarterly reports to the World Bank.
- The PMU will publish on its website the overall information on its grievance mechanism on a quarterly basis.

Serious and Sensitive Grievances

In case a stakeholder to the MICTTD programs supported by the WB (including community members, contractors, or workers) experiences serious mistreatment such as sexual exploitation and abuse, sexual harassment, intimidation, other abuse, violence, discrimination or injustice in a context related to program activities, the person may raise the case to the GM Focal Point by all available avenues. The GM Focal Point will immediately investigate the case respecting confidentiality and anonymity of the person. The GM Focal Point may seek support from the KFSU Social Specialist. The GM Focal Point and the KFSU Social Specialist will receive training from a professional specialized in this area in investigating serious grievances, relevant laws and regulations, and WB standards.

Culturally sensitive and locally appropriate protocols and procedures for serious grievances will be developed jointly by the PMU GM Focal Point, the KFSU Social Specialist and the WB 60 days after project effectiveness, and will be included in training of MICTTD PMU staff and consultants to ensure that direct workers for the project are familiar with the protocols and procedures. The protocols and procedures should be based on the following principles:

- | |
|---|
| <ul style="list-style-type: none"> • All complaints received will be filed and kept confidential. For statistical purposes, cases will be anonymized and bundled to avoid identification of persons involved. • After reaching a solution to a case, the GM Focal Point will follow-up to ensure that the solutions are effective. • Criminal cases will be referred to the public prosecutor. |
|---|

5.1 World Bank Grievance Redress

Communities and individuals who believe that they are adversely affected by a World Bank-supported project may submit complaints to existing project-level GM or to the World Bank's Grievance Redress Service (GRS). Once the concerns have been brought directly to the World Bank's attention, and Bank management has been given an opportunity to respond, complaints may be submitted to the World Bank's independent Inspection Panel which determines whether harm occurred, or could occur, because of World Bank non-compliance with its policies and procedures. Information on the World Bank's corporate Grievance Redress Service is provided at: www.worldbank.org/en/Projects-operations/products-and-services/grievance-redress-service. Information on how to submit complaints to the World Bank's Inspection Panel is provided at: www.inspectionpanel.org.

7. Process Documentation, Monitoring and Reporting

The SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented is consistent and reflects the evolving nature of information required at different stages of the project, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to project related activities or schedule will be reflected in the SEP.

Quarterly summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions, will be collated by the designated social/communications specialist, and referred to the Project Manager. Quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the project's ability to address those in a timely and effective manner. MICTTD will disclose on its website aggregate numbers of grievances received and resolved, including the different categories of grievances.

Day-to-day implementation of the SEP (including reporting back to stakeholders) will be the responsibility of the KFSU Social Specialist who will be supported by the KFSU International Safeguards Specialist.

Annex A. Grievances Registry Database - Example

[illegible]

GRIEVANCE INTAKE FORM

Person Filling the Form:		Date:	
1. INFORMATION ABOUT THE COMPLAINANT			
Name Surname:		How was grievance received	
ID Number:		Phone	<input type="checkbox"/>
Phone:		Face to face	<input type="checkbox"/>
Address:		Web-site/ E-Mail	<input type="checkbox"/>
E-Mail:		Other (Explain)	<input type="checkbox"/>
Stakeholder Type			
Public Institution	<input type="checkbox"/>	Project Affected People	<input type="checkbox"/>
Private Enterprise	<input type="checkbox"/>	Trade Association	<input type="checkbox"/>
NGO	<input type="checkbox"/>	Media	<input type="checkbox"/>
Interest Groups	<input type="checkbox"/>	Industry Associations	<input type="checkbox"/>
Workers' Union	<input type="checkbox"/>	University	<input type="checkbox"/>
2. DETAILED INFORMATION ON THE GRIEVANCE			
Description of the Grievance:			

Resolution method requested by the complainant

3. DETERMINATION OF NECESSARY ACTION

Resolution decided by the Ministry,
responsible department, date of completion
of action

Annexure C

Waste Management Plan

Kiribati Waste Management Context

Poor waste management is one of the major environmental problems in Kiribati, particularly on South Tarawa¹⁵. It poses a serious threat to health, erodes the economy, affects future development and is a deterrent to tourism. Rubbish pollutes public areas and may leach into the fresh water supply which is already very limited.

The Ministry of Environment, Lands and Agriculture Development (MELAD) has identified waste management and pollution control as one of the core environmental issues in Kiribati. On South Tarawa many people have no choice but to live in sub-standard, unhealthy and crowded conditions in part because of the large amount of rubbish and pollutants. Compounding this waste management issue are the many chickens, dogs and pigs that forage amongst the rubbish and around the houses. Over many years machinery, vehicles, household goods, office equipment, batteries, chemicals, bottles, cans, plastics and the like have been imported into Kiribati.

Solid waste management issues have been exacerbated by:

- economic growth and urbanisation;
- limited availability of suitable land for landfills which is exacerbated by customary land tenure;
- remoteness resulting in high costs for returning recyclable wastes items and in turn making recycling operations unviable;
- lack of legislation/national policy that deals with the importation of hazardous products; and
- illegally dumping mixed waste along foreshore areas.

E-waste

As is the case with many other countries across the world, Kiribati has an increasing proliferation of electronic and electrical goods (such as computers, mobile phones, iPad, printers, and photocopiers). Increasing use of such technology, high obsolescence due to limited repair capabilities and the need for newer models has resulted in an increased accumulation of e-waste.

For recycling, e-waste needs to be disassembled into plastic, metal and mixed fractions. This is a labour intensive but low technology process that is well suited to the Pacific Islands. This process converts e-waste to e-scrap which potentially has high value. However, the remoteness of the islands coupled with low volumes generated means the development of a viable business case in Kiribati is challenging. In Phase 1 of the SWM Programme, management of e-waste is addressed through the identification of a storage facility for e-waste, the organisation of a process for retrieving e-waste in consultation with councils and the establishment of an ongoing schedule that covers these objectives.¹⁶

Waste Generation and Management under the Project

There are two types of waste anticipated under the project: construction-related waste and e-waste.

Construction-related waste is expected to be mainly packaging materials and other minor quantities of construction waste associated with the NDC construction. The construction contractor will be required (though contract provisions) to remove from the island all waste associated with materials and NDC equipment brought to Kiribati.

¹⁵ Save Kiribati (2021) Management of Wastes. <https://savekiribati.com/waste-management.php> (accessed 12 October 2021)

¹⁶ Government of Kiribati (2019) *Mid-term evaluation of the Kiribati Solid Waste Management Programme*. New Zealand Foreign Affairs and Trade. April 2019

E-waste will be generated during Project implementation mainly resulting from obsolete ICT components currently in use in Government departments. This e-waste will be transported to the Tarawa Material Recycling Facility (MRF) for dismantling, packing and storing for future shipment off island via the Moana Taka Partnership (MTP) (see below) or at full cost.

At present there is a legacy stockpile of e-waste stored in containers at the MRF as, to date, the MTP option has not been available. The Project will consider financing the export of the legacy e-waste stockpile and also any e-waste accumulated during the implementation period.

Moana Taka Partnership

The Moana Taka Partnership partners China Navigation Company Ltd./ Swire Shipping Agencies, and SPREP to provide free container hire and free shipment of eligible waste between Swire Shipping serviced ports in the Pacific Island Countries and Territories (PICTs). Considering the waste management challenges faced by PICTs, the partners signed a Memorandum of Understanding (MOU) on March 20 2018 - as part of the Global Recycling Day - to address critical waste management issues in the Pacific Islands under the Moana Taka Partnership (MTP) project.

The Moana Taka Partnership helps alleviate the burden of waste on islands in the Pacific by enabling Swire Shipping vessels to utilise empty shipping containers to transport non-commercial recyclable waste from islands. This waste is transported to countries with appropriate waste disposal facilities, ensuring that everything from oil to plastics to aerosols are properly recycled. This partnership is critical in facilitating a circular economy, by providing access to waste and recycling infrastructure abroad¹⁷.

¹⁷ <https://www.sprep.org/sites/default/files/documents/publications/moana-taka-partnership.pdf>

Annexure D

Chance Finds Procedure

Cultural heritage encompasses tangible and intangible heritage which may be recognized and valued at a local, regional, national, or global level. *Tangible cultural heritage*, which includes 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. Tangible cultural heritage may be in urban or rural settings and may be above or below land or under the water. *Intangible cultural heritage*, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artefacts, and cultural spaces associated therewith— that communities and groups recognize as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history.

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

Chance find procedures will be used as follows:

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

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

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

Annexure E

Terms of References for Environmental and Social Specialists

TERMS OF REFERENCE

ENVIRONMENTAL AND SOCIAL SPECIALIST

Title:	Individual consultant - Environmental and Social Specialist
Location:	Tarawa, Kiribati Kiribati Fiduciary Services Unit (KFSU) Ministry of Finance and Economic Development (MFED)
Duration:	One (1) year, subject to extension

Background:

Kiribati is among the most vulnerable nations in the world. It is highly exposed to adverse effects from climate change and natural hazards which can result in disasters that affect its entire economic, human, and physical environment and impact its long-term development agenda.

In recognition of these risks, international development agencies are working with the Government of Kiribati (GoK) to implement several projects. Specifically, through World Bank financing the GoK has the following active Investment Projects:

- Kiribati Connectivity Project
- Pacific Regional Oceanscape Project – Kiribati
- COVID-19 Response Project
- Pacific Statistics – Kiribati
- Kiribati Outer Islands Transport Infrastructure Investment Project
- South Tarawa Water and Sanitation Project

Additional investment projects may be added during the time of this consultancy.

Kiribati Fiduciary Services Unit (KFSU):

To support the implementation of World Bank projects, the Ministry of Finance and Economic Development (MFED) has established the KFSU. The objective of the KFSU is to centrally house positions and skills which are required across the portfolio, including procurement, financial management, social and environmental safeguards. Centralizing these roles allows for in country full-time specialists that consist of local and international experts, it aims to strengthen coordination and consistency across the portfolio, harmonize country processes and increase the capacity of the GoK.

All projects have a Project Implementation Unit (PMU) located within the implementing ministry for the project comprising at least a full time Project Manager and relevant technical and support specialists.

The KFSU provides specialist support to each PMU and implementing agency.

The Environmental and Social Specialist will be part of an environment and social team in the KFSU; these positions are currently under recruitment. Local Environmental and Social Officers will work out of the Tarawa office. While this position is intended to be permanently/semi-permanently based in Kiribati, the successful candidate will provide remote guidance and support until travel restrictions ease. The Environmental and Social Specialist will report to the KFSU Manager and will work collaboratively with the environment and social team in the KFSU, as well as any housed in PMUs. The environmental and social team will develop a coordination mechanism to ensure that the workload

across the portfolio is addressed in a coordinated manner. The Environmental and Social Specialist will provide ongoing training and capacity building to the Environmental and Social Officers and PMU team members.

World Bank Safeguards Policies and the Environmental and Social Framework

The majority of Investment Projects in Kiribati fall under the World Bank's Safeguards Policy. The COVID-19 Response Project is the first in Kiribati which follows the Environmental and Social Framework (ESF). All future projects will be processed under the ESF.

Location: The International Environmental and Social Specialist will ideally be located full time in Tarawa and perform his/her duties in Kiribati once travel restrictions are lifted. Travel within Kiribati will be required.

Timing: The expected contract duration is 12 months. An extension of this position may be considered and will be dependent upon satisfactory performance and availability of funding.

SCOPE OF WORK

The GoK is seeking to hire an International Environmental and Social Specialist to support the implementation of the environmental, social and health and safety risk management activities for the World Bank-funded portfolio in Kiribati. The Environmental and Social Specialist will also be required to provide general support, as needed, to the KFSU and implementing agencies. The portfolio consists of several activities that will require robust environmental risk management oversight.

Activities include, but are not limited to:

- Oversee the work done by local Environmental and Social (E&S) Officers, providing input, guidance and direction for tasks and ensuring timely environmental and social risk management advice and support is provided to all World Bank financed projects (active and under preparation) on an as-needed basis.
- Provide expert input to projects that are under preparation – this includes reviewing risk assessments; environmental, social and health and safety risk management instruments, and; contributing to the project design.
- Provide expert advice to the PMUs and the GoK on key environmental issues and aspects of all Projects in a timely manner, including general environmental, social and health and safety risk management advice and advice on the implementation of safeguards/ESF instruments.
- Provide training and mentoring to the nationally hired Environmental and Social Officer(s) in the KFSU, including developing and implementing a training and capacity building plan.
- Provide formal and ad-hoc training, mentoring and other capacity building to PMUs, KFSU and government staff and other stakeholders on the World Bank safeguards policies and ESF and the Project environment and social risk management instruments, including developing and implementing training and capacity building plans;
- Provide guidance and support to the Environmental and Social Officers on E&S assessments and instruments, and/or supervise the preparation of assessments and instruments in the case that specialist consultants are required.
- If a project's Contingency Emergency Response Component (CERC) is triggered during the period of contract, oversee E&S officer's work with the PMU team, and provide guidance on the required environmental and social risk management assessment, screening and preparation of environmental and social instruments, as required.

- For all Projects and the KFSU, assist as necessary, with the procurement of additional environmental and social support staff and / or consultants, by preparing TOR and reviewing CVs / proposals / candidates.
- Support the relevant PMU to manage any significant environmental and social risks and/or incidents on any Project.
- Complete project assurance and monitoring activities such as inspections and audits to ensure compliance with the WB safeguards policies/ESF and associated instruments.
- Manage project-level citizen and stakeholder engagement and disclosure processes to ensure World Bank Policy/ESF and community expectations are met.
- Provide oversight and guidance with resolving difficult grievances that cannot be resolved by the Implementing Agency.
- Other tasks as required.

KEY ACTIVITIES, DELIVERABLES AND REPORTING OBLIGATIONS

- Validate the environmental and social risk screening undertaken E&S Officers and ensure the relevant laws, policies and standards have been applied. Attend World Bank missions, field trips, meetings etc. as required.
- Support the preparation and review of Environmental and Social Management Plans, Environmental and Social Management Frameworks, Codes of Practice, Procedures, Audits and other instruments under the ESF for new projects and under the Safeguards Policies and Project ESMF for current projects.
- Development of standard operating procedures for the KFSU, PMU and others relating to environmental and social risk management and occupational health and safety.
- Prepare Environmental and Social Commitment Plan and Stakeholder Engagement Plan, required for preparatory activities across the portfolio.
- Monthly brief progress report (1 page) to be submitted by the environmental and social team to KFSU Program Manager.

QUALIFICATION AND EXPERIENCE REQUIREMENTS

Mandatory

- Graduate or master's degree in environmental and/or social impact assessment, environmental science, environmental engineering, planning or similar relevant discipline.
- At least 10 years' relevant experience in environmental and social assessments with demonstrated experience in working with remote and small communities on infrastructure projects using Good Industry International Practice for environmental, social and occupational health and safety mitigation and management.
- Demonstrated ability to write clear and concise reports.
- Understanding of Kiribati's contemporary development and environmental challenges, including a good working knowledge of Kiribati's social and environmental legislation.
- An occupational, health and safety (OH&S) risks and management qualification.

Desirable

- Experience in Kiribati and/or other similarly remote locations.
- Experience and necessary skills to build capacity with team members and stakeholders, both informally and formally.
- Demonstrable experience in the application World Bank safeguards policies and ESF or with working other multilateral development banks or international agencies.

- Ability to develop and manage own workload and prioritize effectively in response to project demands and timeframes and provide timely advice and deliverables to PMU and KFSU team members.
- Experience working within multi sector and multicultural teams
- A sound understanding of i-Kiribati culture.

The attention of interested Consultants (including those referred by firms) is drawn to paragraph 3.14, 3.16 and 3.17 of the World Bank's *Procurement Regulations for IPF Borrowers* [dated July 2016 revised in November 2017 and August 2018] ("the Regulations"), setting forth the World Bank's policy on conflict of interest.

TERMS OF REFERENCE ENVIRONMENTAL SAFEGUARD OFFICER

Title:	Individual consultant – Environment Safeguard Officer
Location:	Tarawa, Kiribati Kiribati Fiduciary Services Unit (KFSU) Ministry of Finance and Economic Development (MFED)
Duration:	One (1) year, subject to extension

Background:

Kiribati is among the most vulnerable nations in the world. It is highly exposed to adverse effects from climate change and natural hazards which can result in disasters that affect its entire economic, human, and physical environment and impact its long-term development agenda.

In recognition of these risks, international development agencies are working with the Government of Kiribati (GoK) to implement several projects. Specifically, through World Bank financing the GoK has the following active Investment Projects:

- Kiribati Connectivity Project
- Pacific Regional Oceanscape Project – Kiribati
- COVID-19 Response Project
- Pacific Statistics – Kiribati
- Kiribati Outer Islands Transport Infrastructure Investment Project
- South Tarawa Water and Sanitation Project

Additional investment projects may be added during the time of this consultancy.

Kiribati Fiduciary Services Unit (KFSU):

To support the implementation of World Bank projects, the Ministry of Finance and Economic Development (MFED) has established the KFSU. The objective of the KFSU is to centrally house positions and skills which are required across the portfolio, including procurement, financial management, social and environmental safeguards. Centralizing these roles allows for in country full-time specialists that consist of local and international experts, it aims to strengthen coordination and consistency across the portfolio, harmonize country processes and increase the capacity of the GoK.

All projects have a Project Implementation Unit (PMU) located within the implementing ministry for the project comprising at least a full time Project Manager and relevant technical and support specialists.

The KFSU provides specialist support to each PMU and implementing agency.

The Environmental Officer will be part of an environment and social team in the KFSU; these positions are currently under recruitment. International specialist(s) for environmental and social will provide remote guidance and support until travel restrictions ease. The Environmental Officer will report to the KFSU Manager (with a dotted line to the International Environmental and Social Specialist) and will work collaboratively with the environment and social team in the KFSU, as well as any housed in PMUs. The environmental and social team will develop a coordination mechanism to ensure that the workload across the portfolio is addressed in a coordinated manner.

World Bank Safeguards Policies and the Environmental and Social Framework

The majority of Investment Projects in Kiribati fall under the World Bank's Safeguards Policy. The COVID-19 Response Project is the first in Kiribati which follows the Environmental and Social Framework (ESF). All future projects will be processed under the ESF.

Location: The Environmental Officer will be located full time in Tarawa and perform his/her duties in Kiribati. Travel within Kiribati will be required.

Timing: The expected contract duration is 12 months. An extension of this position may be considered and will be dependent upon satisfactory performance and availability of funding.

SCOPE OF WORK

The GoK is seeking to hire a local Environmental Officer to support the implementation of environmental risk management activities for the World Bank-funded portfolio in Kiribati. The Environmental Officer will also be required to provide general support, as needed, to the KFSU and implementing agencies. The portfolio consists of several activities that will require robust environmental and social risk management oversight.

Activities include, but are not limited to:

- Provide input to projects that are under preparation – this includes preparing or contributing to risk assessments, collecting relevant data, preparing environmental and health and safety instruments, conducting field work, preparing, or contributing to TORs for consultants, supervising consultants, and contributing to the project design.
- Provide advice to the PMU and the GoK on key environmental and health and safety issues and aspects of all Projects in a timely manner, including general environmental and health and safety advice and advice on the implementation of safeguards instruments.
- Prepare or contribute to environmental and health and safety assessments and instruments, and/or supervise the preparation of environmental assessments and instruments in the case that specialist consultants are required.
- Together with the Social Officer/Specialist, if a project's Contingency Emergency Response Component (CERC) is triggered during the period of contract, the Environmental Officer shall work with the PMU team to undertake, where necessary, the required environmental and health and safety assessment, screening, and preparation of environmental instruments.
- For all Projects, assist as necessary, with the procurement of additional environmental support staff and / or consultants, by preparing TOR and reviewing CVs / proposals / candidates.
- Support the relevant PMU to manage any significant environmental and health and safety risks and/or incidents on any Project.
- Complete project assurance and monitoring activities such as inspections and audits to ensure compliance with the WB safeguards policies/ESF and associated instruments.
- Input to project progress reports and attendance at meetings, as required.
- Supervision of environmental consultants which may be brought on for additional support.
- Other tasks as required.

KEY DELIVERABLES

- Preparation of Environmental and Social Management Plans, Environmental and Social Management Frameworks, Codes of Practice, Procedures, Audits, and other instruments under the ESF for new projects and under the Project ESMF for current projects.

- Provide input into standard operating procedures for environmental risk management (jointly with the Social Officer/Specialist).
- Other items as required.

QUALIFICATION AND EXPERIENCE REQUIREMENTS

Mandatory

- Qualification from a recognized tertiary institution preferably Bachelors Degree in environmental engineering, environmental science, planning or similar.
- At least three years of working experience undertaking environmental functions under public or private sectors.
- Fluency in written and spoken English and local language (i-Kiribati).
- Competency in the use of computer applications, especially MS Office and Excel.
- Demonstrated ability to work under pressure and pay attention to detail.

Desirable

- Ability to learn quickly.
- Organized and detail oriented.
- Computer skills
- Good communication skills
- Experience in occupational health and safety mitigation and management
- Experience in the completion of site inspections and monitoring activities
- Experience working under the Multilateral Development Banks and International Agencies such as the World Bank, ADB, JICA, etc.

The attention of interested Consultants (including those referred by firms) is drawn to paragraph 3.14, 3.16 and 3.17 of the World Bank's *Procurement Regulations for IPF Borrowers* [dated July 2016 revised in November 2017 and August 2018] ("the Regulations"), setting forth the World Bank's policy on conflict of interest.

TERMS OF REFERENCE SOCIAL SAFEGUARD OFFICER

Title:	Individual consultant - Social Safeguard Officer
Location:	Tarawa, Kiribati Kiribati Fiduciary Services Unit (KFSU) Ministry of Finance and Economic Development (MFED)
Duration:	One (1) year, subject to extension

Background:

Kiribati is among the most vulnerable nations in the world. It is highly exposed to adverse effects from climate change and natural hazards which can result in disasters that affect its entire economic, human, and physical environment and impact its long-term development agenda.

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Kiribati Fiduciary Services Unit (KFSU):

To support the implementation of World Bank projects, the Ministry of Finance and Economic Development (MFED) has established the KFSU. The objective of the KFSU is to centrally house positions and skills which are required across the portfolio, including procurement, financial management officers, social and environmental safeguards. Centralizing these roles allows for in country full-time specialists that consist of local and international experts, it aims to strengthen coordination and consistency across the portfolio, harmonize country processes and increase the capacity of the GoK.

All projects have a Project Implementation Unit (PMU) located within the implementing ministry for the project comprising at least a full time Project Manager and relevant technical and support specialists.

The KFSU provides specialist support to each PMU and implementing agency.

The Social Officer will be part of an environment and social team in the KFSU; these positions are currently under recruitment. International specialist(s) for environmental and social will provide remote guidance and support until travel restrictions ease. The Social Officer will report to the KFSU Manager (with a dotted line to the Environmental and Social Specialist) and will work collaboratively with the environment and social team in the KFSU, as well as any housed in PMUs. The environmental and

social team will develop a coordination mechanism to ensure that the workload across the portfolio is addressed in a coordinated manner.

World Bank Safeguards Policies and the Environmental and Social Framework

The majority of Investment Projects in Kiribati fall under the World Bank's Safeguards Policy. The COVID-19 Response Project is the first in Kiribati which follows the Environmental and Social Framework (ESF). All future projects will be processed under the ESF.

Location: The Social Officer will be located full time in Tarawa and perform his/her duties in Kiribati. Travel within Kiribati will be required.

Timing: The expected contract duration is 12 months. An extension of this position may be considered and will be dependent upon satisfactory performance and availability of funding.

SCOPE OF WORK

The GoK is seeking to hire a local Social Officer to support the implementation of social risk management activities for the World Bank-funded portfolio in Kiribati. The Social Officer will also be required to provide general support, as needed, to the KFSU and implementing agencies. The portfolio consists of several activities that will require robust environmental and social risk management oversight.

Activities include, but are not limited to:

- Provide input to projects that are under preparation – this includes preparing or contributing to risk assessments, collecting relevant data, preparing social instruments, conducting field work, preparing or contributing to TORs for consultants, supervising consultants, and contributing to the project design.
- Provide advice to the PMU and the GoK on key social issues and aspects of all Projects in a timely manner, including general social advice and advice on the implementation of safeguards instruments.
- Prepare or contributing to social assessments and instruments, and/or supervise the preparation of social assessments and instruments in the case that specialist consultants are required.
- Together with the Environmental Officer/Specialist, if a project's Contingency Emergency Response Component (CERC) is triggered during the period of contract, the Social Officer shall work with the PMU team to undertake, where necessary, the required social assessment, screening and preparation of social instruments.
- For all Projects, assist as necessary, with the procurement of additional social support staff and / or consultants, by preparing TOR and reviewing CVs / proposals / candidates.
- Support the relevant PMU to manage any significant social risks and/or incidents on any Project.
- Complete project assurance and monitoring activities such as inspections and audits to ensure compliance with the WB safeguards policies/ESF and associated instruments.
- Input to project progress reports and attendance at meetings, as required.
- Supervision of social consultants which may be brought on for additional support.
- Other tasks as required.

KEY ACTIVITIES, DELIVERABLES AND REPORTING OBLIGATIONS

- Preparation of Environmental and Social Management Plans, Environmental and Social Management Frameworks, Codes of Practice, Procedures, Audits and other instruments under the ESF for new projects and under the Project ESMF for current projects.
- Ensure project-level citizen and stakeholder engagement and disclosure processes to ensure World Bank policy and community expectations are met.
- Review of the GRM system and assist with resolving difficult grievances that cannot be resolved by the Implementing Agency.
- Provide input into standard operating procedures for social risk management (jointly with the Environmental Officer/Specialist).

QUALIFICATION AND EXPERIENCE REQUIREMENTS

Mandatory

- Tertiary education from a recognized institution preferably Bachelors Degree in social impact assessment, anthropology, planning or similar.
- At least 3 years of working experience undertaking social functions under public or private sectors.
- Fluency in written and spoken English and local language (i-Kiribati)
- Competency in the use of computer applications, especially MS Office and Excel.
- Demonstrated ability to work under pressure and pay attention to detail.

Desirable

- Ability to learn quickly
- Organized and detail-oriented
- Computer skills
- Good communication skills
- Experience working under the Multilateral Development Banks and International Agencies such as the World Bank, ADB, JICA, etc.

The attention of interested Consultants (including those referred by firms) is drawn to paragraph 3.14, 3.16 and 3.17 of the World Bank's *Procurement Regulations for IPF Borrowers* [dated July 2016 revised in November 2017 and August 2018] ("the Regulations"), setting forth the World Bank's policy on conflict of interest.