



FSM National Oceanic  
Resource Management  
Authority

**Federated States of Micronesia**  
**Pacific Islands Regional Oceanscape Program Second Phase for Economic**  
**Recovery and Resilience (PROPER)**  
**(P178237)**

# **Environmental and Social Management Plan**

**DRAFT FOR DISCLOSURE PURPOSES ONLY**

This document is based upon the original Concept project design for FSM PROPER. Amendments to the Project after the Concept phase are not assessed in this document, and will be assessed in an updated set of instruments (ESMP, SEP, LMP, ESIA) per the ESCP. Therefore, this document does not reflect the full set of Project activities, and includes discussion of activities that are no longer included in the Project, or activities that have been amended. For the current set of Project activities, please refer to the PAD. This document will be replaced by the updated version within 6 months of the Project Effective Date.

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## Abbreviations

ADB	Asian Development Bank
AESIA	Abbreviated Environmental Impacts Assessment Statement
CA	Competent Authority
CESMP	Contractors Environmental and Social Management Plan
CIU	Central Implementation Unit
COC	Code of Conduct
DAHT	Division of Anti-Human Trafficking Services
DECEM	Department for Environment, Climate Change, and Emergency Management
DFAT	Australian Department of Foreign Affairs and Trade
DFMR	Kosrae Division of Fisheries and Marine Resources
DHSA	National Department of Health and Social Affairs
DMR	Chuuk Department of Marine Resources
DOFA	Department of Finance and Administration
DoJ	Department of Justice
DRD	Department of Resource and Development
DREA	Kosrae Department of Resources and Economic Affairs
DTI	Kosrae Department of Transport and Infrastructure
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment
IAS	Environmental Impacts Assessment Statement
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
ESCP	Environmental and Social Commitment Plan
ESIA	Environmental and Social Impact Assessment
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
EU	European Union
FAD	Fish Aggregation Device
FFA	Pacific Islands Forum Fisheries Agency
FFC	Forum Fisheries Committee
FSM	Federated States of Micronesia
GEF	Global Environment Facility
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
GRS	World Bank Grievance Redress Service
GIIP	Good International Industry Practice
GHP	Good Hygiene Practice
GS	Gender Strategy
HACCP	Hazard Analysis and Critical Control Point
HT	Human Trafficking
IA	Implementation Agency
IDA	International Development Association
IMS	Information Management System
IN	Infrastructure (refers to the infrastructure and procurement activities in the activities list)
JICA	Japanese International Cooperation Agency
KIRMA	Kosrae Island Resource Management Authority
KPA	Kosrae Port Authority
LMP	Labor management Procedures
MCT	Micronesia Conservation Trust

MPA	Marine Protected Area
MRF	Materials Recovery Facility
MRMD	Chuuk Marine Resources and Management Division
M&E	Monitoring and Evaluation
NAC	National Aquaculture Center
NORMA	National Oceanic Resource Management Authority
OFA	Pohnpei Office of Fisheries and Aquaculture
OHS	Occupational Health and Safety
PDO	Project Development Objective
PICs	Pacific Island Countries
PIU	Project Implementation Unit
PMU	National Project Management Unit
PPA	Project Preparation Advance
PROP	Pacific Islands Regional Oceanscape Program
PROPER	Pacific Islands Regional Oceanscape Program – Second Phase for Economic Resilience
DPWT	Yap Department of Public Works and Transport
REA	Rapid Ecological Assessment
R&D	National Department of Resource and Development
RMC	Resource Management Committee (Kosrae MPAs)
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SPC	Pacific Community
TA	Technical Assistance (refers to activities in the activities list that do not involve civil works)
VAC	Violence Against Children
WB	World Bank
WCPFC	Western and Central Pacific Fisheries Commission
WCPO	Western and Central Pacific Ocean
YFA	Yap Fishing Authority

## 1 Introduction

The Federated States of Micronesia (FSM) has received financing from the World Bank (WB) International Development Association (IDA) for the preparation of the second phase of the Pacific Islands Regional Oceanscape Program (PROP). PROP comprised a series of Programs, which included separate national Programs in the Federated States of Micronesia (FSM), the Republic of the Marshall Islands, Tuvalu and the Solomon Islands, and a separate but complementary regional Program implemented by FFA. Programs in Kiribati, Tonga and Samoa have also recently joined. The second phase is now called the FSM Pacific Regional Oceanscape Program – Economic Resilience (FSM PROPER). FSM PROPER is envisaged to maintain and expand on the gains achieved through the first phase, PROP.

The FSM PROPER development objective (PDO) is to strengthen regional collaboration and national capacity for the management and the sustainable development of the oceanic and coastal fisheries sector in FSM and the critical habitats on which they depend. The preparation phase of FSM PROPER is currently being progressed by the National Oceanic Resource Management Authority (NORMA) in conjunction with the national and state agencies within the FSM with a Project Preparation Advance (PPA) from the WB. FSM PROPER is scheduled to start implementation in 2024.

FSM PROPER will be prepared under the WB Environmental and Social Framework<sup>1</sup> (ESF) which came into effect from October 2018. FSM PROPER activities (Appendix 1) to be undertaken under the funding are required to comply with the WB's ESF. Activities are a mix of technical assistance, studies and capacity building (labelled TA in Appendix 1) and equipment procurement, infrastructure renovations and a new building for NORMA and the Competent Authority (labelled IN in Appendix 1). The Environmental and Social Standards (ESS) within the ESF that are relevant to FSM PROPER are:

- ESS1 Assessment and Management of Environmental and Social Risks and Impacts
- ESS2 Labor and Working Conditions
- ESS 3 Resources Efficiency and Pollution Prevention and Management
- ESS4 Community Health and Safety
- ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ESS10 Stakeholder Engagement and Information Disclosure.

The following environmental and social (E&S) instruments have been prepared for the Program appraisal and approval by the WB:

- Environmental and Social Commitment Plan (ESCP - ESS1)

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<sup>1</sup> <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>



- Environmental and Social Management Plan (ESMP - ESS1)
- Labor Management Procedure (LMP -ESS2)
- Stakeholder Engagement Plan (SEP- ESS10).

This document provides the ESMP for the FSM PROPER. The ESMP is an instrument that details the measures to be taken during the implementation and operation of a project to eliminate or offset adverse environmental and social impacts, or to reduce them to acceptable levels and the actions during implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels.

## 2 Project Background and Rational

The FSM PROPER is a response to the challenges facing oceanic and coastal fisheries, and marine habitats in the FSM. These challenges include unsustainable fishing practices, weak institutional capacity, inadequate data collection and management, limited seafood market access, environmental degradation, and the impacts of climate change (Project Document, Sept. 2023). By addressing these issues, FSM PROPER aims to support the long-term sustainability of fisheries resources, through; enhanced livelihoods and economic resilience, safeguarding marine habitats, and mitigating the adverse effects of climate change. The Programs approach and activities are designed to address these challenges and lay the foundation for a more prosperous and resilient fisheries sector in FSM.

Through extensive stakeholder consultations and a rigorous project design, the project has incorporated the inputs and perspectives of relevant stakeholders. The project consists of three key components:

- Strengthening the institutional capacity, governance, and sustainable management of oceanic fisheries in the FSM
- Strengthening the sustainable management of and socio-economic benefits from coastal fisheries in the FSM
- Strengthening the sustainable management, protection, and resilience of marine habitats in the FSM.

The Oceanic Fisheries Component of the FSM PROPER project aims to maximize the value of oceanic resources to the FSM, particularly considering the region's vital role in global tuna fisheries. This component focuses on improving fisheries management and surveillance measures to safeguard revenues and aims to enhance participation in fishery and ancillary activities, fostering the domestic fisheries sector's growth and contributing to FSM's overall prosperity. The following primary activities are included:

- Institutional strengthening, including capacity and competency development of Competent Authority (CA) staff, CA system strengthening and implementation, and establishment of a Reference Laboratory

- Development and application of an effective information management system (IMS) to inform decision-making for oceanic fisheries including implementation of the Electronic Monitoring program
- Institutional strengthening of NORMA through improved facilities (a new NORMA headquarters office building) to enable expansion and remit to be carried out more effectively
- Reviews to maximize the value of oceanic resources to the FSM through the Implementation of the Fisheries Investment Policy and additional initiatives.
- The Coastal Fisheries component of the FSM PROPER project aims to strengthen the sustainable management of coastal fisheries in the FSM. The activities across the various subcomponents work synergistically to empower local communities, support economic development, ensure food security, and protect the valuable coastal fisheries resources for present and future generations. The Coastal Fisheries Component includes the following primary activities:
  - Re-development of Chuuk marina (Weno) docking and mooring facilities, development of a new marina and fisheries hub at Dekehtik, Pohnpei, and upgrades and improvements to marinas in Kosrae
  - Bottom-up fisheries and aquaculture development (through feasibility studies assessing the potential for community-driven commercialization of aquaculture developments, and value-added products at marinas)
  - Improved enforcement of fisheries regulations and environmental laws through institutional capacity enhancement
  - Improved safety and reduce losses at sea through: training and awareness and the provision of safety equipment for small powered fishing vessels, in exchange for vessel registration and/or data
  - Assessment of existing data and development of new/revised protocols for fisheries and ecological data collection and storage
  - Equipment for collection and storage of fisheries and environmental data and training for agencies and communities in new data collection (protocols, hardware and software)
  - Renovations of the DREA fisheries office in Kosrae
  - Consultations to produce revised and updated fisheries, aquaculture, and environmental legislation, including deputization of Community Conservation Officers (CCOs), and dissemination of new inshore fisheries laws, regulations, policies and development plans
  - Increased enforcement and enhanced safety through mandatory vessel registration and training

- Development of fish aggregation device (FAD) management plans, and support for the installation of FADs for use by coastal communities to allow for more production from non-reef sources.

By addressing the challenges in waste management and focusing on the protection (particularly through reducing pollution from mismanaged waste) and restoration of marine habitats, the Marine Habitats and Waste component of the FSM PROPER Project seeks to safeguard the productivity and resilience of fisheries in the FSM and the broader Pacific region. The Marine Habitats and Waste Component includes the following primary activities:

- Community capacity building in waste management and coastal pollution
- Improved protection and conservation of the coastal ecosystem, e.g., through expansion of the environmental mooring buoy system in Kosrae and restoration of dredge sites in Yap
- Chuuk waste infrastructure: Preparation of new landfill site at Nepukos village; Sorting and clearance of interim marina waste site in Weno; and Phase three: Build of new solid waste management facility at existing site (Neauo)
- Improved land and marine based collection and disposal of waste.

Preparation of teams to conduct assessments for marine ecological health and monitoring through dive certifications and training. Lastly, the Project Management component will ensure the smooth implementation and coordination of project activities, including salaries, as well as meetings and other miscellaneous office costs. (Project Document, Sept. 2023)

Activities under the each of these components are detailed in Appendix 1

### **3 FSM National and State Legislative & Regulatory Framework**

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

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

## 3.1 National

### 3.1.1 FSM Constitution

The Constitution of the FSM (the ‘Constitution’) is the supreme law in FSM, and includes a bill of rights (Art IV).

The Constitution acknowledges and protects the role and functions of traditional leaders as recognized by custom and tradition, as well as the traditions of the Micronesian people (Art V).

The Constitution establishes National, State and Municipal levels governance (Art VII).

Each State is required to have its own democratic Constitution. The Constitution refers to traditional practice and custom as a guiding influence in all aspects of decision-making in FSM and seeks to preserve the role of tradition and custom in FSM life. To support this, a Council of Chiefs consisting of traditional leaders and elected representatives is provided for in the Constitution.

Article IX of the Constitution establishes FSM’s legislature, which selects the President, and with members elected for districts in each state according to population. Each State elects their own legislature and governor. The National legislature has the power to make legislation on a wide range of topics. For example, they may make laws “to regulate the ownership, exploration, and exploitation of natural resources within the marine space of the Federated States of Micronesia beyond 12 miles from island baselines” [Title 3].

Article X of the Constitution vests FSM’s executive power in an elected President as the Head of State, who is elected by Congress for a four-year term and limited to no more than two consecutive terms. The President appoints judges, ambassadors and principal officers of government departments in the National Government.

Article XI of the Constitution establishes the judiciary of FSM as comprised of the Supreme Court, and subsidiary courts, established by statute. The Judiciary Act of 1979 provides further guidance about the judiciary of FSM. Court decisions are constitutionally required to be consistent with Micronesian customs and traditions.

The legislative power of the National Government is vested in Congress. The Congress includes one member elected from each of the four States’ At Large seats, and additional members elected from congressional districts in each State apportioned by population. Chuuk, Pohnpei and Yap may decide that one of its seats be reserved for a traditional leader in place of one of the elected representatives.

Regulation development, as prescribed under the FSM Administrative Procedures Act, requires the widespread publication and dissemination of proposed regulations before adoption, including radio announcements in English and indigenous languages. Opportunities for public comment and public hearings are incorporated in the Act.

In most instances, national legislation is supplemented, or even duplicated, by State legislation. The Constitution contains several references to the environment, land use and customs, including:

- Preamble** States, in part, “[t]o make one nation of many islands, we respect the diversity of our cultures. Our differences enrich us. The seas bring us together, they do not separate us. Our islands sustain us, our island nation enlarges us and makes us stronger.”
- Article XIII** Contains additional provisions, including some that relate to the environment.
- Section 2** Provides that “radioactive, toxic chemical, or other harmful substances may not be tested, stored, used, or disposed of within the jurisdiction of the Federated States of Micronesia without the express approval of the national government of the Federated States of Micronesia.”
- Section 4** In terms of land use, “[a] noncitizen, or a corporation not wholly owned by citizens, may not acquire title to land or waters in Micronesia.”
- Section 5** Prohibits a lease agreement for the use of land for an indefinite term by a noncitizen, a corporation not wholly owned by citizens, or any government is prohibited.
- Section 113 (General Provisions)** Empowers the High Commissioner to restrict or forbid non-citizens from acquiring interests in real property and in business enterprises.
- Section 114 (General Provisions)** Requires due recognition to be given to local customs in the system of law.
- Section 202 (General Provisions)** Provides that customs not in conflict with other laws in Micronesia are preserved.

### [3.1.3 FSM Environment Protection Act \(2014\)](#)

The Environment Protection Act (revised Code 2014) provides for the protection of the environment, culture, historic and natural aspects of Micronesian heritage.

The Act is a national government declaration of on-going commitment in cooperation with State and municipal governments and other concerned public and private organizations. The Act declares to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare to create and maintain conditions under which the people of FSM man and nature can exist in productive harmony and fulfill the social, economic, and other requirements of present and future generations of FSM.

The Act declares that it is the continuing responsibility of the FSM to use all practicable means, consistent with other essential considerations of national policy, to improve and coordinate governmental plans, functions, programs, and resources to the end that the inhabitants of the FSM may:

- a) Fulfill the responsibilities for each generation as trustee of the environment for succeeding generations.
- b) Assure for all Micronesians safe, healthful, productive, and aesthetical and culturally pleasing surroundings.
- c) Attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable or unintended consequences.
- d) Preserve important historic, cultural, and natural aspects of our Micronesian heritage, and maintain, wherever possible, an environment, which supports diversity and variety of individual choice.

The effort to protect and preserve the environment needs to be carried forward in close cooperation with the States in the formulation of policy, enforcement, and other activities.

The FSM recognizes that each person has a responsibility to contribute to the preservation and enhancement of the environment. Section 302 of the Environmental Impact

Assessment Act states that - 1) any person, prior to taking any action that may significantly affect the quality of the environment within the Exclusive Economic Zone (EEZ) of the FSM, or within the boundaries of the National Capital Complex at Palikir, must submit an environmental impact statement to the Director, in accordance with regulations established by the Director. (2) The environmental impact statements required by subsection (1) of this section are public documents.

Building on the Trust Territory Environmental Quality Protection Act (Title 25 of the FSM Constitution), the FSM Environmental Protection Act 1984 (FSM EPA), and its subordinate instruments, seeks to provide the legislative basis for the protection of the environment, including cultural, historic and natural aspects of Micronesian heritage, throughout FSM. The Act acknowledges that close co-operation between the National and State Governments is required to support this objective.

The 1969 Act established the Environmental Protection Board within the Office of the President. The Board is composed of five members: "one member from each State and one member appointed by the President". In 1987, an Act to Reorganize the Government of the FSM redefined the Board to mean the Secretary for Human Resources.

The Act requires the Secretary to enter into written cooperative arrangements with the States or State agencies for the purposes of providing funds to the States, collecting data on local needs and transferring authority to the States to act as agents of the National Government in

implementing environmental programs at the State level. Such delegation of functions may be withdrawn on written advice from the Secretary if the delegation results in termination of any financial grant.

The Secretary, as a result, has broad authority to protect health, welfare and safety and to implement policy and strategies, through the promulgation of regulations, to remedy pollution and contamination of air, land and water.

### 3.1.2 FSM EPA Environmental Impact Assessment Regulations (1989)

The purpose of the EIA Regulations is to implement Section 13 of the FSM Environmental Protection Act by establishing standard procedures for preparation of an environmental impact assessment statement prior to taking or funding any major action that may significantly affect the quality of the human environment.

These Regulations require the National Government and its agencies to submit an Environmental Impact Statement (EIS) to the Secretary of Human Resources prior to taking any “major”<sup>3</sup> action significantly effecting the quality of the human environment. “Effect” is defined to include indirect, direct and cumulative effects in areas such as land use, population density, air, water and natural systems including ecosystems. “Effects” may be ecological, aesthetic, cultural, historical, economic, social or health-related. “Significant Impacts”, determined as a result of a preliminary assessment, require a Comprehensive EIA. Draft EIA statements are to be made available for public comment and review, including provision for a public hearing.

Part I (l) defines Project Proponents as the FSM National Government or its agencies or the recipient of funding from the FSM National Government or its agencies, which propose to undertake any major action significantly affecting the quality of the human environment. Part III sets out the EIA process. Part IV elaborates on this process which is a two-step assessment process with the first step being the submission of an Initial Assessment using a checklist template. If following evaluation there are potentially severe environmental impacts, then a Comprehensive EIA is required. The contents of the Comprehensive EIA are set out in Part V.

The EIA process is intended to help the general public and government officials make decisions with the understanding of the environmental consequences of their decisions, and take actions consistent with the goal of protecting, restoring, and enhancing the environment. These regulations provide the directions to achieve this purpose. In addition, these regulations are designed to:

- a) Integrate the EIA process into early planning of projects to ensure timely consideration of environmental factors and to avoid delays
- b) Identify at an early stage the significant environmental issues requiring further study thereby defining the scope of the EIA.

For the FSM PROPER NORMA in association with state implantation partners (see the SEP for a full list of Implementation Partners) and the CIU Safeguards Team would identify the range of permits required, prepare the assessments and the permit applications. As much as possible / relevant the assessments will be prepared for both the WB and FSM requirements.

### 3.1.3 Marine Resources Act (2002)

The purpose of this Act is to ensure the sustainable development, conservation and use of the marine resources in the exclusive economic zone by promoting development of, and investment in, fishing and related activities in the context of effective stewardship.

Section 102 contains definitions. No domestic fishing, commercial pilot fishing, foreign fishing or such other fishing or related activity as may be prescribed and no marine scientific research, training or foreign recreational fishing shall be allowed without a valid license to be obtained under this Subtitle (sects. 103 and 104). No foreign fishing vessel shall be issued a permit to fish in the exclusive economic zone unless an applicable access agreement is in force (sect. 105).

Section 106 allows the NORMA, established under section 201, to enter into fisheries management agreements and multilateral access agreements and to take specified measures within the framework of such agreements. A permit issued or renewed under this subtitle shall only be valid for the species of fish, the type of fishing gear or method of fishing, or such other activity in accordance with this subtitle, as may be specified in the permit (sect. 110). The Authority shall have the authority to adopt Regulations pursuant to section 204. Section 301 and following sections concern licensing and registration of flag fishing vessels. Sections 401 to 406 concern access agreements. Other provisions deal with enforcement, implementation of fishing treaties, allocation, inspection, offences and legal proceedings.

### 3.1.4 Marine and Freshwater Quality Standards Regulations (1986)

The Marine and Freshwater Quality Standards Regulations (1986) identify the uses for which waters of FSM shall be maintained and protected in order to specify water quality standards required to maintain the designated use and to prescribe requirements to maintain specified water quality. Any entity responsible for a point source discharge that threatens a breach of these standards, unless it has received a discharge permit under the National Pollutant Discharge Elimination System (NPDES) from the USEPA, is in breach of these Regulations.

These Regulations provide the basis for the state water quality Regulations, with EPA/KIRMA managing these requirements at the state level. Most of their effort is allocated to drinking water quality rather than river or marine waters and, as a result, baseline data is sparse.

### 3.1.5 Trust Territory Solid Waste Regulations (1979)

The Trust Territory Solid Waste Regulations (1979) establish minimum standards for the design, construction, installation, operation and maintenance of solid waste storage, collection and disposal systems. "Solid Waste" is defined as "garbage, refuse, and other discarded solid waste materials" not including substances in water sources, but including



liquid waste such as waste oil, pesticides, paints, solvents and hazardous waste. A “disposal system” includes the entire process of storage, collection, transportation, processing and disposal of solid waste by any person or authority.

### 3.1.6 FSM EPA Earthmoving Regulations (1988)

These Regulations provide that “no person shall release funds, equipment or materials or building permit to those engaged in earthmoving activities until a permit is issued by the Secretary of Human resources”. Earthmoving is defined to include activities of a continuous nature such as dredging or quarrying which disturb or alter the surface of the land, including reefs and lagoons. Earthmoving also applies to the subdivision of land, and the moving, depositing or storing of soil, rock, coral or earth.

All aggregate material used for site preparation, roads and any other construction activities undertaken under the FSM PROPER will require to be sourced from a quarry facility that has the appropriate permit. NORMA will need to establish from State agencies whether a permit is required for the “depositing or storing of soil, rock, coral or earth”. If aggregate material is imported then State regulations will also need to be met.

### 3.1.7 FSM Land Use Act

Section 205 of the General Provisions of the Land Use Act for FSM provides that “[t]he law concerning ownership, use, inheritance, and transfer of land in effect in any part of the Trust Territory on December 1, 1941, shall remain in full force and effect to the extent that it has been or may hereafter be changed by express written enactment made under authority of the Trust Territory.”

The Government Property Acquisition [Title 56] deals with eminent domain (Chapter 1), real property acquisition (Chapter 2), relocation assistance (Chapter 3) and alien property (Chapter 4).

## 3.2 State Government Legislation, Regulation and Policy Requirements

The four States of FSM each have their respective state level regulations and legal frameworks elaborating on the National Constitution and EIA Regulation and stipulating their specific requirements. The state level EIA Regulations are briefly discussed below. Note that it is the State regulations that are the most important for the FSM PROPER as the works will be implemented and monitored at a State level.

### 3.2.1 Kosrae

The following laws and policies that exist in Kosrae for managing and conserving the environment that may apply to the FSM PROPER:

- Constitution of the State of Kosrae 1984 (Primary rule of law in the State of Kosrae)
- Kosrae State Code, Title 17, Chapter 4 (Establishes the Kosrae EPA)
- Kosrae State Code Title 9 (Establishes the Kosrae Protected Areas System)
- Kosrae Island Resource Management Act

- Kosrae State Development Regulation 2014
- Kosrae State Code, Section 11.103 (State Acquisition of Land)
- Kosrae Code, Section 11.1401 and 11.1402 (Protection of antiquities and traditional culture)
- Kosrae Code, Section 11.1601 (Endangered species)
- Kosrae Code Section 11.201 (Land use and subsidiary regulations)
- Kosrae Code, Section 13.1201 (Toilets and the disposal of domestic (human) waste).
- Kosrae Code, Section 13.506 (Littering)
- Kosrae Code, Section 13.514 (Water quality).
- Kosrae Code, Section 13.524 (Endangering a species).

The Agency responsible for environmental approvals in Kosrae is the Kosrae Island Resource Management Agency (KIRMA) who is responsible for the administration of TITLE 19. Environmental Protection and Management. KIRMA has advised that the FSM PROPER activities will require an Environmental Clearance. This requires the review of the proposed activity and the issuance of an Environmental Clearance.

### 3.2.2 Pohnpei

The following laws and policies that exist in Pohnpei for managing and conserving the environment that may apply to the FSM PROPER:

- Constitution of the State of Pohnpei 1984 (Primary rule of law in the State of Pohnpei)
- Public Trust Lands Distribution Act 1980
- Public Lands Act 1987
- Deed of Trust Act 1987
- Trust Territory Environmental Protection Act, preserved from the Trust Territory environmental law (The Act and subordinate regulations relate to:
  - Air pollution
  - Pesticides
  - Public water supply systems
  - Marine and freshwater quality
  - Solid waste
  - Toilet facilities and sewerage disposal
  - Earthmoving
- Transportation Zone Act 1987
- Conservation and Resource Enforcement Act 1982
- Forest Management Act 1979
- Pohnpei Watershed Forest Reserve and Mangrove Protection Act 1987

- Designation of State Bird Act
- Marine Resources Conservation Act 1981
- Pohnpei Environmental Protection Act 1992
- Pohnpei Cultural Preservation Act
- Trust Territory Environmental Quality Protection Act.

The Agency responsible for environmental approvals in Pohnpei is the EPA who is responsible for the administration of Pohnpei Environmental Protection Act 1992. The EPA has advised that the FSM PROPER activities will require an Environmental Permit. This requires the review of the proposed activity and the issuance of a Permit.

### 3.2.3 Chuuk

The following laws and policies that exist in Chuuk for managing and conserving the environment that may apply to the FSM PROPER:

- Constitution of the State of Chuuk 1989 (Primary rule of law in the State of Chuuk)
- Memorandum of Understanding (MoU) – Solid Waste Management (MoU between the State and National Governments delegating State power to administer, at State level, the Solid Waste Management Permit Program and the Solid Waste Management Permit Variance Program)
- MoU – Earthmoving (MoU between the State and National Governments delegating State power to administer, at State level, the National Earthmoving Regulations)
- Chuuk State Historic Preservations Act 1991 (Relating to wrecks in Chuuk lagoon)
- Chuuk State Environmental Protection Act 1994.

The Agency responsible for environmental approvals in Chuuk is the Chuuk EPA who is responsible for administration of the Chuuk State Environmental Protection Act (1994). One of the EPA's powers (para f) is: "Establish and provide for the continuing administration of a permit system whereby a permit shall be required before the discharge by any person of any pollutant in the air, lands and water or for the conduct by any person of any activity, including but not limited to, the operation, construction, expansion, alteration of any facilities."

Section 1006 of the Act states that "A person shall submit an environmental impact statement to the Agency, in accordance with regulations established by the Agency, prior to taking any major action which may substantially affect the quality of the environment."

The EPA has advised that the FSM PROPER activities will require an Environmental Permit and that an Environmental Impact Assessment Statement (EIAS) has been completed for the Weno landfill (Nimbus Environmental Services, 2021).

### 3.2.4 Yap

The following laws and policies that exist in Chuuk for managing and conserving the environment that may apply to the FSM PROPER:

- Constitution of the State of Yap 1982 (Primary rule of law in the State of Yap)
- Environmental Quality Protection Act 1987
- Draft Water Supply Systems Regulations (Based on the U.S. Trust Territory Public Water Supply Systems Regulations)
- Trust Territory Solid Waste Regulations 1979
- Draft Toilet Facilities and Sewerage Disposal Regulations
- Draft Earthmoving and Sedimentation Regulations.
- Yap State Code, Chapter 10, Section 1008 (Wildlife conservation)
- Yap State Code, Title 11, Section 805 (Oil spills)
- Yap State Code, Title 11, Section 815 (Reef and environmental damage)
- Yap State Code, Title 18, Chapter 4, Section 401 (Disposal of petroleum products)
- Yap State Code, Title 18, Sections 404, 402 and 403 (Relating to oil spills)
- • Yap State Code, Title 18, Chapter 10, Section 1011 (Temporary protection of marine life)
- Yap State Code, Title 20, Chapter 3 (Building permits).

The Agency responsible for the environment in Yap is the Yap EPA who are responsible for the administration of the Yap State Environmental Quality Protection Act. The Act stipulates that an Environmental Impact Assessment (EIA) must be undertaken where action “may significantly affect the quality of the human or natural environment”. Discussions with the EPA indicate that the proposed activities will not require an EIA.

## 4 International Environmental Agreements

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

- International Plant Protection Convention 1951
- World Heritage Convention 1972
- United Nations Convention on the Law of the Sea 1982
- Agreement relating to the Conduct of a Joint Program of Marine Geoscientific Research and Mineral Resource Studies of the South Pacific Region, with Annexes, 1982; with Related Agreement, 1984
- Vienna Convention for the Protection of the Ozone Layer 1985
- Convention for the Protection of the Natural Resources of the South Pacific Region 1986; and companion protocols 1986
- Convention on Biological Diversity (CBD) 1993
- United Nations Framework Convention on Climate Change (UNFCCC) Paris Agreement 2016.

## 5 World Bank ESF

As detailed in the introduction the FSM PROPER is required to be prepared under the WB ESF. The introduction also outlines the ESSs that apply to the FSM PROPER and the required documents (instruments) for the approval of the FSM PROPER.

At the project (activity) level, the WB global aspirations translate into enhancing development opportunities for all, particularly the poor and vulnerable, and promoting the sustainable management of natural and living resources. Within the parameters of a project, the WB ESF seeks to:

- Avoid or mitigate adverse impacts to people and the environment
- Conserve or rehabilitate biodiversity and natural habitats, and promote the efficient and equitable use of natural resources and ecosystem services
- Promote worker and community health and safety
- Ensure that there is no prejudice or discrimination toward project-affected individuals or communities and give particular consideration to Indigenous Peoples, minority groups, and those disadvantaged or vulnerable, especially where adverse impacts may arise or development benefits are to be shared
- Address project-level impacts on climate change and consider the impacts of climate change on the selection, siting, planning, design and implementation and decommissioning of projects
- Maximize stakeholder engagement through enhanced consultation, participation and accountability.

### 5.1 World Bank General Environmental, Health & Safety Guidelines

The World Bank Group's General Environmental, Health, and Safety Guidelines 2007 (EHS Guidelines) represent good international practice for managing environmental impacts and community and occupational health and safety (OHS) risks. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs.

### 5.2 World Bank Good Practice Notes

A number of World Bank Good Practice Notes which outline an E&S Framework for Investment Project Financing (IPF) Operations are relevant for the FSM PROPER including:

- Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works, February 2020
- Non-Discrimination and Disability, June 2018
- ESS6: Biodiversity and Sustainable Management of Living Natural Resources, June 2018
- Gender, October 2019

- Non-Discrimination: Sexual Orientation and Gender Identity (SOGI), October 2019.

### 5.3 Good International Industry Practice

Good International Industry Practice (GIIP) is defined as the exercise of professional skill, diligence, prudence, and foresight that would reasonably be expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally or regionally. The outcome of such exercise should be that the project employs the most appropriate technologies in the project-specific circumstances (WB –ESF).

## 6 Environmental and Social Context

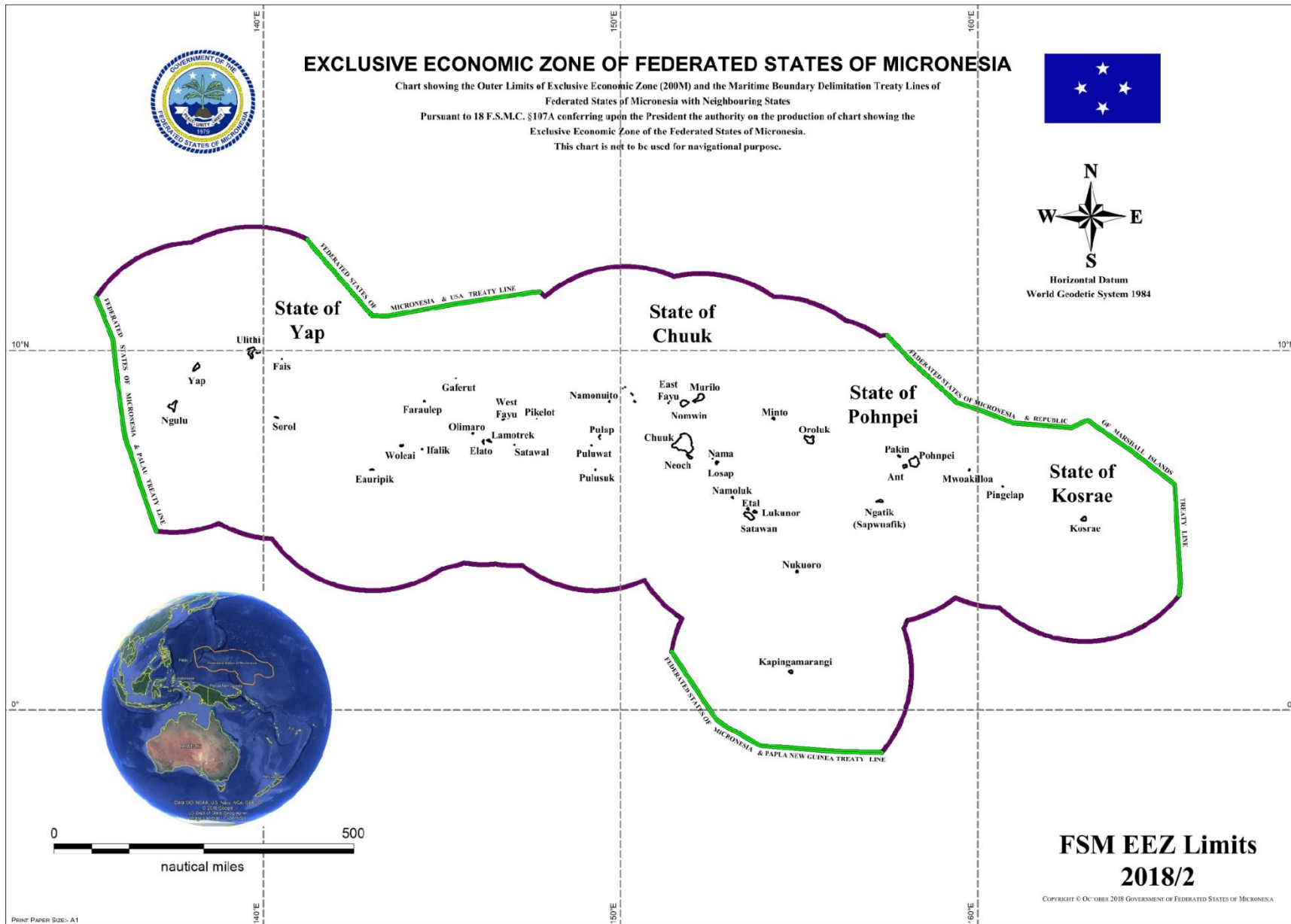
FSM is a widely dispersed archipelago in the North Pacific Ocean comprising 607 islands (74 inhabited) in four states; Yap, Chuuk, Pohnpei and Kosrae. Islands range from extinct volcanic shields with elevations up to 760m and dense vegetated interiors, to small low-lying forested atoll islands, typically 1-5m elevation (**Figure 6.1**).

FSM's estimated population is 113,815 (2019) and is one of the youngest in the Pacific region. FSM is particularly vulnerable to the impacts of natural disasters and climate change and faces significant challenges related to sea level rise, intensified storm surges, increased rainfall, and flooding. Demographic challenges include population decrease due to a declining fertility rate and out-migration, extreme geography and limited economic viability, high poverty rate, lean institutional capacity, urbanization and youth unemployment, poor land governance, and gender-based violence.

Total land area is only 702km<sup>2</sup> but it is 2,700km between the western-most state of Yap, and the eastern-most state of Kosrae. The FSM Exclusive Economic Zone (EEZ) is the third largest in the Western and Central Pacific Ocean (WCPO) region. The WCPO has rich marine biodiversity and ecosystems. Coral reefs, seagrass beds, mangroves and coastal wetland habitats provide vital protection from increasing threats from sea level rise, floods and storm events and help mitigate climate change through carbon sequestration. Although Pacific Island Countries coastal ecosystems produce some of the world's most significant marine biodiversity, the 2020 State of the Environment in the Pacific Islands report shows ecosystem health and extent are diminishing under increasing pressure.

Regional coastal fisheries play a crucial role in supporting local livelihoods, national food sovereignty and security, nutrition and dietary health. Women are particularly dependent on coastal fisheries for economic opportunities. Recent research found women's participation in fisheries in the Pacific is often over 50 percent when gleaning and subsistence fisheries are included (Pacific Handbook for Gender and Social Inclusion in Coastal Fisheries and Aquaculture 2021). Traditionally, fish and seafood are primary sources of animal protein in Pacific Islanders' diets, therefore reef and lagoon fisheries are highly susceptible to over-exploitation, exacerbated by specialized export fisheries.

Figure 6.1. Location of FSM with maritime and economic zone boundaries



Marine resources are one of the most precious natural assets of FSM and fisheries is one of FSM's priority sectors to stimulate economic growth and development. This is in the context of recent negative economic impacts due to COVID 19 with the FSM border. Program activities will be located throughout FSM, focusing largely on technical programs but with some physical works, including the development of a trial marina upgrade/expansion for later extension to other existing sites. A full list of activities under the Program is presented as Appendix 1.

## **7 Anticipated Environmental & Social Impacts and Risks of Program Components and Activities**

The WB risk rating for environmental is "moderate", with mostly temporary impacts which would be managed through conventional E&S risk management approaches. The FSM PROPER is expected to have a largely positive environmental impact through improved management and sustainability of fisheries.

The social rating is assessed as Moderate. A moderate risk rating is proposed primarily because the FSM PROPER is not complex and/or large, does not involve activities that have a high potential for harming people, properties or their livelihood activities. This assessment is in the context of the positive social impacts that the FSM PROPER will have in terms of developing the FSM fisheries industry including for livelihoods and food security screening finds that potential impacts are less significant, site specific, mostly reversible and that a range of potential measures for mitigation can be readily designed in the majority of cases.

The proposed activities (Appendix 1) may have external or third-party impacts, with the principal E&S risks relating to Occupational Health and Safety (OHS) and impacts to neighboring communities and limited impacts on terrestrial and marine environments from infrastructure civil works. All the civil works (except for 3.2.1 Preparation of new landfill site at Nepukos village, Chuuk) are brownfield development sites with limited ecological value and minimal environmental impact. Civil works for the infrastructure activities pose short term impacts and risk associated with construction such as traffic, noise, dust, etc. to adjacent communities and workers OHS.

The following section details each activity and the specific impacts and risks associated with those activities and proposed mitigation strategies. Infrastructure activities have been separated and presented by state as these activities require a higher level of management due to their broader scope of impacts and risks and this layout will make it simpler to transfer the mitigation strategies into a Contractors Environmental and Social Management Plan (CESMP - Appendix 2).

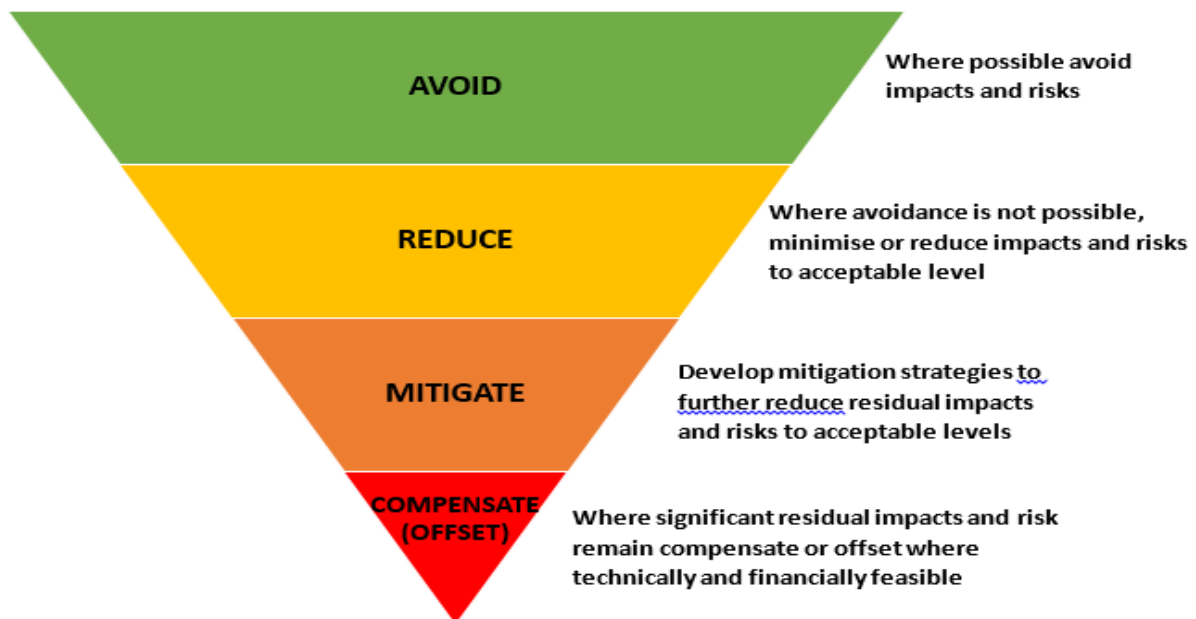


## 8 Environmental and Social Impacts and Risks and Proposed Mitigation Measures

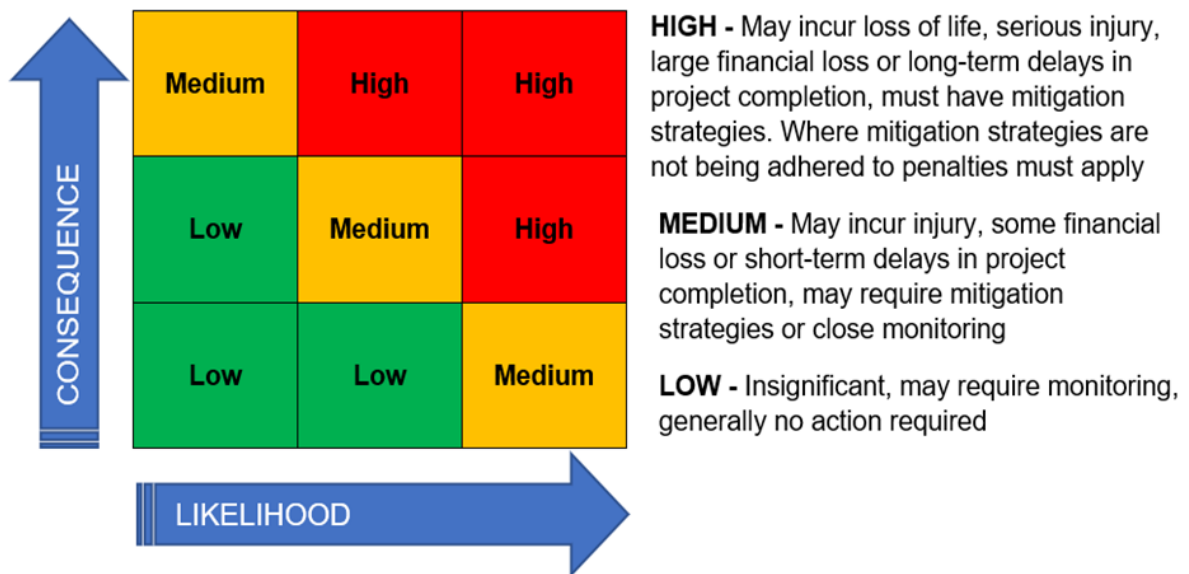
To address the potential adverse impacts and risks of the FSM PROPER activities, mitigation measures are developed to avoid and/or minimize the impacts and risks on the biophysical and social environment surrounding the activity site utilizing the mitigation hierarchy detailed in **Figure 8.1**. Negative impacts and risks during the various phases of the FSM PROPER are considered and strategies to avoid and/or minimize the impacts, in the most practical way possible will be implemented.

For the purpose of this ESMP an impact is the expected outcome of an action and risk is the chance that the impact will occur, calculated as potential consequences of harm by the likelihood of the event occurring. Risk analysis for this ESMP will be undertaken using the likelihood- consequence matrix detailed in **Figure 8.2**.

**Figure 8.1** Mitigation Hierarchy



**Figure 8.2 Risk Matrix**



To determine the residual risks for each potential impact post implementation of mitigation strategies, a similar risk assessment approach has been undertaken. The likelihood of an impact occurring following the implementation of management and mitigation measures is assessed using the categories provided in **Table 8.1**.

**Table 8.1 Likelihood categories**

LIKELIHOOD	DESCRIPTION
<b>Certain</b>	Expected to happen routinely during the activities life
<b>Likely</b>	Could easily happen and has occurred on a previous similar activity
<b>Unlikely</b>	Possible, but not anticipated

The consequence of the impact occurring following the implementation of management and mitigation measure is assessed using the categories provided in **Table 8.2**.

**Table 8.2 Consequence categories**

CONSEQUENCE	DESCRIPTION
<b>Minor</b>	Minor effects on biological, social, economic or physical environment, both built and natural. Minor short to medium term damage to small area of limited significance, easily rectified
<b>Moderate</b>	Moderate effects on biological, social, economic or physical environment, both built and natural. Moderate short to medium term widespread impacts. More difficult to rectify
<b>Major</b>	Serious effects on biological, social, economic or environment, either built or natural. Relatively widespread medium to long term impacts. Rectification difficult or impossible

Based on the assessment of the likelihood and consequence of a given risk with the proposed management and mitigation measures in place, a residual risk rating is derived from the risk matrix as presented in **Table 8.3**.

**Table 8.3** Residual Risk Matrix

LIKELIHOOD	CONSEQUENCE		
	Minor	Moderate	Major
Certain	Medium	High	High
Likely	Low	Medium	High
Unlikely	Low	Low	Medium

If an identified residual risk remains high, consideration of additional management and mitigation measures will be identified and implemented, or justification provided for the risk.

### 8.1 Technical Assistance Impacts Risks and Mitigation strategies

This section details the impacts, risks and mitigation strategies to avoid or mitigate impacts and risks of activities that have been designated as Technical Assistance (TA - Appendix 1). Most of these activities have very limited impacts and risks and many of the impacts and risks are generic. Technical Assistance activities include:

- Capacity building, training, workshops, certification and staff development
- Development of plans, processes, procedures, policies, legislation, regulation, standards and data management
- Feasibility studies, assessments and reviews
- Awareness campaigns.

The undertaking of TA studies, assessments, plans etc. does not provide any substantial impacts or risks, labor management and labor OHS risks are addressed in the LMP. It is the implementation of policies, plans and other actions emanating from the TAs that may cause impacts and associated risks. As such it is the responsibility of the PIU and CIU to ensure that proposed actions from any of the TA activities are developed in line with the WB ESF and meet the objectives of the ESF outlined in Section 5. Additional impacts and risks identified for the TA activities in the following **Table 8.4** are related to the failure of the activity to provide adequate results or lead to delays in implementation of plans, policies etc. This would lead to the failure or delay in implementation which in-turn impacts the end user or stakeholders reliant on the sector.

**Table 8.4** details the assessed impacts and risks, the mitigation strategy to be applied to reduce each impact and risks and persons/agency responsible for implementing/monitoring the mitigation strategy.

**Table 8.4** TA activity impacts/risks, mitigation strategies and responsible agency

ACTIVITY	TYPE	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
<b>1 Strengthening the institutional capacity, governance, and sustainable management of oceanic fisheries in the FSM</b>						
<b>1.1 Establishment of a Competent Authority (CA)</b>						
<b>1.1.1 Institutional strengthening, including capacity and competency development of Competent Authority staff</b>						
1.1.1.1 Staff development: GHP, GMP, HACCP, vessel and facility inspection trainings and audits	Capacity building	Training not fit for purpose	Green	Develop a staff development strategy and undertake broad engagement with other PICs to develop appropriate staff development	CA with support from the PIU and CIU	Green
1.1.1.2 Hiring of additional Competent Authority staff	Recruitment	Insufficient staff capacity and brain drain challenges.	Yellow	Implement effective recruitment strategies to attract and retain qualified staff members. Offer competitive salaries and professional development opportunities to build and maintain a skilled workforce. Establish a robust recruitment and retention strategy to ensure the availability of qualified personnel within the CA. Compliance with FSM PROPER LMP	CA for hiring, PIU for oversight	Green
<b>1.1.2 Competent Authority system strengthening and implementation</b>						
1.1.2.1 Implementation of the Competent Authority regulation, national control plan (NCP), & industry standards	Regulation, Plan and standards	Lack of regulation and standards delays EU authorization process	Yellow	Facilitate early development of the necessary regulations, NCP and standards. Utilize experience from other PICs. Maintain a proactive approach to ensure timely authorization. Strengthen collaboration with EU authorities to expedite the approval process.	CA with support from the PIU and CIU	Green
1.1.2.2 Consolidation of European Union (EU) process ready for Competent Authority	Process	Delays in EU authorization process	Yellow	Monitor communication with the EU closely and provide regular updates to mitigate potential delays. Maintain a proactive approach to ensure timely authorization. Strengthen collaboration with EU authorities to expedite the approval process	CA with support from the PIU and CIU	Yellow
<b>1.2 Establishment of a Reference Laboratory</b>						
1.2.1 Feasibility study of establishing a Reference Laboratory	Feasibility study	Insufficient guidance in the ToR for the study and engagement of consultants or firms	Yellow	Undertake sufficient research utilizing suitable technical specialists to identify appropriate ToR for the study and selection of an appropriate consultant or firm to undertake the study	PIU/CIU	Green

ACTIVITY	TYPE	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
		without the appropriate skill set to undertake the study				
		Feasibility study reveals significant challenges or limitations in establishing a Reference Laboratory		Conduct a comprehensive feasibility study, engage technical experts, and explore alternative solutions or partnerships to address any challenges identified	PIU/CIU and CA	
1.2.1.2 Establishment of sampling and analysis procedures; lab capacity and procedure development including training of food analysts	Procedures and training	Delays in developing the laboratory and staff capacity and procedures will delay the EU authorization process		Engage experienced laboratory consultants, provide necessary training and capacity building programs, and establish clear timelines and milestones for procedure development. Develop a comprehensive recruitment and retention strategy to ensure a skilled and sustainable workforce	CA	
<b>1.3 Oceanic Fisheries Management: Data</b>						
<b>1.3.1 Development and application of an effective information management system (IMS) to inform decision-making for oceanic fisheries</b>						
1.3.1.1 Continued development of an IMS that collects and houses fisheries and related data from industry and various databases	Database development	Technical challenges during system development and integration		Monitor the implementation of the Integrated Management System (IMS) and address any technical challenges promptly. Ensure ongoing technical support to resolve issues efficiently	PIU/CIU and NORMA	
<b>1.3.2 Implementation of the Electronic Monitoring program</b>						
1.3.2.4 Review of EM Data Reviews and program cost recovery	Review	Stakeholder conflicts and resistance to data collection		Maintain active engagement with stakeholders (industry) throughout the implementation process. Proactively communicate project goals, benefits, and address any conflicts that arise. Regular consultation and communication will help mitigate potential risks and build stakeholder support.	PIU/CIU and NORMA	
<b>1.3.3 Institutional strengthening of NORMA through improved facilities to enable expansion and remit to be carried out more effectively</b>						

ACTIVITY	TYPE	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
1.3.3.1 Design consultancy for NORMA office building that includes a wet space (to be located on land at Pohnpei port)	Design	Insufficient guidance in the ToR leads to delays or challenges in the design of the new NORMA office building		Undertake sufficient research to develop appropriate ToR to engage experienced architects for the design of the building. Facilitate the engagement of suitable architects and maintain engagement with the architects during the design work	PIU/CIU and NORMA	
<b>1.4 Maximize the value of oceanic resources to the FSM through the Implementation of the Fisheries Investment Policy and additional reviews</b>						
<b>1.4.1 Institutional strengthening of NORMA through improved facilities to enable expansion and remit to be carried out more effectively</b>						
1.4.1.1 Creation of an Implementation Plan for the FSM National Oceanic Fisheries Investment Policy	Plan	Insufficient guidance in the ToR and lack of oversight delay the development of the Plan		Develop clear ToR for the development of the Plan and responsibilities for managing the development, review and approval of the Plan Assign dedicated resources to the task (in addition to the planned consultancy), establish clear timelines and milestones, and engage relevant stakeholders to ensure timely completion of the Implementation Plan	PIU/CIU and NORMA	
1.4.1.2 Review of how to enhance oceanic fisheries value through management using measures such as MCS, as well as how to leverage VDS days and value-adding	Review	Insufficient guidance in the ToR and lack of oversight lead to poor review outcomes		Develop clear ToR for the review and engage suitable expertise to undertake the review	PIU/CIU and NORMA	
1.4.1.3 Review of the legal framework for authorization of fishing vessels requesting to enter FSM ports	Review	Insufficient guidance in the ToR and lack of oversight lead to poor review outcomes		Engage suitable legal experts, consult with relevant stakeholders early and frequently, and ensure thorough review and analysis of the legal framework to identify areas for improvement and address potential challenges	PIU/CIU and NORMA	
1.4.1.4 Development of service provision at Weno Port: Feasibility study to assess potential for increased service provision at Weno Port	Feasibility Study	ToR for the study and engagement of consultants or firms without the appropriate skill set to undertake the study		Undertake sufficient research utilizing suitable technical specialists to identify appropriate ToR for the study and selection of an appropriate consultant or firm to undertake the study	PIU/CIU and NORMA	
<b>2 Strengthening the sustainable management of and socio-economic benefits from coastal fisheries in the FSM</b>						

ACTIVITY	TYPE	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
<b>2.1 Marina Developments</b>						
<b>2.1.1 Re-development of Chuuk marina (Weno) services and facilities.</b>						
2.1.1.1 Design consultancy to assess infrastructure needs at current Weno marina, Chuuk site and provide development plans	Design consultancy	Insufficient guidance in the ToR leads to delays or challenges in the design of marina Design outside of allocated construction budget lead to an inappropriate design		Undertake sufficient research to develop appropriate ToR to engage experienced architects for the design of the building within budget. Facilitate the engagement of suitable architects and maintain engagement with the architects during the design work	PIU/CIU, DMR	
<b>2.1.2 Development of a new marina and fisheries hub at Dekehtik, Pohnpei.</b>						
2.1.2.1 Design consultancy to develop detailed plans for the new marina and offices/training center at Dekehtik, Pohnpei	Design consultancy	Insufficient guidance in the ToR leads to delays or challenges in the design of marina Design outside of allocated construction budget lead to an inappropriate design		Undertake sufficient research to develop appropriate ToR to engage experienced architects for the design of the building within budget. Facilitate the engagement of suitable architects and maintain engagement with the architects during the design work	PIU/CIU, DRD, OFA	
<b>2.1.3 Bottom-up fisheries development and local capacity building</b>						
2.1.3.1 Assessment of marinas in Pohnpei - infrastructural needs and environmental impact, with the involvement of local associations	Assessment	Insufficient guidance in the ToR and lack of oversight lead to poor assessment outcomes		Develop clear ToR for the review and engage suitable expertise to undertake the assessment	PIU/CIU, DRD, OFA	
2.1.3.2 Re-initiation of Pohnpei Menin Katengensed (Pohnpei Marine Council)	Capacity building	Lack of consultation leads to poor outcome		Facilitate extensive engagement with the Pohnpei Menin Katengensed to provide a consensus on approach and actions	PIU/CIU, DRD, DFW, OFA	
2.1.3.3 Training of fishers on Quality Control and the cold	Training	Training not fit for purpose		Engage appropriate trainers with local knowledge and understanding of cultural context	PIU/CIU, and relevant State	

ACTIVITY	TYPE	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
chain carried out by a local NGO in all states		Fishers not interested in training programs and capacity building initiatives for fishers and local associations		Collaborate with local NGOs and organizations to deliver effective training programs, provide ongoing support and mentorship, and monitor the progress and impact of capacity building efforts	Implementing Partners	
<b>2.1.4 Upgrades and improvements to marinas in Kosrae</b>						
2.1.4.1 Consultancy to assess the feasibility of fish processing units and infrastructural needs (including boat ramps) at Lelu, Okat, and Utwe marinas, Kosrae	Feasibility study	Insufficient guidance in the ToR for the study and engagement of consultants or firms without the appropriate skill set to undertake the feasibility study		Undertake sufficient research to develop appropriate ToR to engage experienced consultants for the feasibility study	PIU/CIU, DREA	
<b>2.2 Safety at Sea</b>						
<b>2.2.1 Improve safety and reduce losses at sea: training and awareness</b>						
2.2.1.1 Sea safety training and awareness program in Chuuk for licensed fishing boat crews in communities	Training	Inadequate community participation and engagement in sea safety programs and the utilization of safety equipment Training not fit for purpose		Implement targeted community awareness campaigns (e.g., in high-risk communities), work closely with local leaders and fishing associations to promote the importance of sea safety, and provide ongoing support and guidance to ensure the effective use of safety equipment by fishers	PIU/CIU, and relevant State Implementing Partners	
2.2.1.2 Sea safety training and awareness program in Kosrae for licensed fishing boat crews in communities						
2.2.1.3 Sea safety training and awareness program in Pohnpei for licensed fishing boat crews in communities						
2.2.1.4 Sea safety training and awareness program in Yap for licensed fishing boat crews in communities						



ACTIVITY	TYPE	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
<b>2.3 Coastal Fisheries Management: Data</b>						
<b>2.3.1 Assessment of existing data and development of new/revised protocols for fisheries and ecological data collection and storage</b>						
2.3.1.1 Assessment of availability of fisheries data/research and identification of priority sites for marine ecological assessments in all states	Assessment	Insufficient guidance in the ToR for the study and engagement of consultants or firms without the appropriate skill set to undertake the assessment		Undertake sufficient research to develop appropriate ToR to engage experienced consultants for assessment	PIU/CIU, and relevant State Implementing Partners	
2.3.1.2 Development of appropriate data collection protocols (market and landing sites) for fisheries in FSM for use in all states.	Protocols	Lack of effective collaboration between consultations and state fisheries and environmental agencies to inform the review of data protocols		Establish clear lines of communication, regular coordination meetings, and collaboration mechanisms between consultants and state agencies to ensure active participation and input in the review of data protocols.	PIU/CIU, and relevant State Implementing Partners	
		Lack of effective collaboration between consultations and state fisheries and environmental agencies to inform the review of data protocols		Establish clear lines of communication, regular coordination meetings, and collaboration mechanisms between consultants and state agencies to ensure active participation and input in the review of data protocols		
2.3.1.3 Validation of new data collection protocols through a series of stakeholder workshops in all states	Workshops	Workshops are poorly attended and workshop material is not fit for purpose		Undertake an awareness campaign prior to workshops to facilitate representative government and community representation. Facilitate advanced preparation of workshop material and ensure workshop material is appropriate for the broad range of participants	PIU/CIU, and relevant State Implementing Partners	
<b>2.3.3 Training for agencies and communities in new data collection (protocols, hardware and software)</b>						

ACTIVITY	TYPE	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
2.3.3.1 Training of staff of fisheries departments and divisions, communities, community-based organizations and non-governmental organizations in the use of the new protocols	Training	Training not fit for purpose		Develop training material in close collaboration of Implementation Partners and ensure trainers have sufficient knowledge of the protocols	PIU/CIU, and relevant State Implementing Partners	
2.3.3.2 Training of staff of fisheries departments and divisions, EPAs, and NGOs, in the use of new hardware and software for data management						
<b>2.4 Coastal Fisheries Management: Legislation and Policy</b>						
<b>2.4.1 Consultations to produce revised and updated fisheries, aquaculture, and environmental legislation, including deputization of Community Conservation Officers (CCOs)</b>						
2.4.1.1 Consultations in Chuuk state to produce revised and updated policies and development	Legislation, plans, policies, MOUs	Political and institutional changes may disrupt the activities continuity		Provide an environment where activities are resilient to personnel and administration transitions. Maintain strong communication channels with relevant stakeholders and proactively address any uncertainties	PIU/CIU, and relevant State Implementing Partners	
2.4.1.2 Consultations in Kosrae state to produce revised and updated policies and development plans (e.g., Kosrae State Code Title 19) plans (e.g., Chuuk State Constitution Title 25)		Limited dissemination and awareness of new inshore fisheries laws, regulations, policies, and development plans, leading to a lack of compliance		Develop comprehensive communication and outreach strategies to effectively disseminate information to relevant stakeholders and ensure widespread awareness of the new legislation and policies		
2.4.1.3 Consultations in Pohnpei state to produce revised and updated policies and development plans (e.g., Pohnpei State Code Titles 26, 28, and 29)		Stakeholder resistance to new regulations impacting livelihoods which may be heightened by inadequate stakeholder		Implement robust communication and awareness strategies to raise awareness among stakeholders. Emphasize the benefits of improved fisheries management and sustainable resource use. Engage with stakeholders through consultation and participatory decision-making processes (ensuring traditional customary requirements		

ACTIVITY	TYPE	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
2.4.1.4 Consultations in Yap state to produce revised and updated policies and development plans (e.g., Yap State Constitution Titles 18, 26, and 29, and MPA-specific legislation) 2.4.1.5 Consultancy to assist with the finalization of the boat registration bills in all states and development of the marina MOUs (e.g., safety equipment in return for vessel registration and/or data provision) 2.4.1.6 Nationally-led validation workshop to discuss proposed legislative, regulatory and policy updates with stakeholders 2.4.1.7 Consultancy to review results of ecological assessments and provide regulatory recommendations to governments		engagement during the development of legislation insufficient capacity and resources within state fisheries agencies		are considered) to build understanding and address concerns. (See SEP for implementation partners and engagement approach) Strengthen collaboration and knowledge-sharing among agencies to ensure effective implementation of revised legislation and policies and ensure sufficient funds are allocated to pass recommendations. Assist agencies with the development of MOUs by providing templates and guidance from the CIU		
<b>2.4.2 Dissemination of new inshore fisheries laws, regulations, policies and development plans</b>						
2.4.2.1 Community and government/organization workshops in Chuuk state	Workshops	Workshops are poorly attended and workshop material is not fit for purpose		Undertake an awareness campaign prior to workshops to facilitate representative government and community representation. Facilitate advanced preparation of workshop material and ensure workshop material is appropriate for the broad range of participants	PIU/CIU State Coordinators and State Implementing Partners	
2.4.2.2 Community and government/organization workshops in Kosrae state						

ACTIVITY	TYPE	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
2.4.2.3 Community and government/organization workshops in Pohnpei state						
2.4.2.4 Community and government/organization workshops in Yap state						
<b>2.4.3 Facilitate enforcement and enhance safety through mandatory vessel registration and training</b>						
2.4.3.5 Enforcement/deputization training to government agencies, NGOs, and CCOs in all states, based on new legislation	Training	Training not fit for purpose		Ensure trainers and training material meets standards across the PICs	PIU/CIU and State Implementing Partners	
<b>2.5 Fish Aggregation Devices</b>						
2.5.1.1 Development of FAD management plans for all states including identification of appropriate locations for deployment	Plans	Environmental risks and impacts on fish behavior and marine ecosystems.		Implement measures to reduce entanglement of marine life around, and pollution due to, FADs. Monitor and address any negative impacts on fish behavior and ecosystem dynamics. Develop and enforce guidelines to minimize ecological disruption	PIU/CIU State Coordinators and State Implementing Partners	
2.5.2.2 Training in FAD operation and monitoring technologies in all states	Training	Social risks and conflicts over FAD use and ownership		Align the FAD program with cultural values, traditional knowledge, and practices of local fishers. Engage stakeholders in decision-making processes and address concerns through transparent communication. Foster collaboration and maintain dialogue to mitigate potential conflicts	PIU/CIU State Coordinators and State Implementing Partners	
2.5.2.4 FAD public awareness campaign across Yap state	Awareness campaign	Low community participation and engagement in FAD deployment and utilization		Conduct targeted public awareness campaigns (in high-risk communities) to promote community involvement and understanding of the benefits and proper use of FADs, fostering community ownership and long-term sustainability	PIU/CIU State Coordinators and State Implementing Partners	
<b>2.6 Aquaculture Developments</b>						
<b>2.6.4 Feasibility assessments for community-focused aquaculture development</b>						

ACTIVITY	TYPE	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
2.6.4.1 Feasibility assessment for development of infrastructure needs (landside and farms) for community-led commercial sea cucumber aquaculture in Pohnpei	Feasibility study	Insufficient guidance in the ToR for the study and engagement of consultants or firms without the appropriate skill set to undertake the study		Undertake sufficient research to develop appropriate ToR to engage experienced consultants for the feasibility study. Facilitate the engagement of with community to ensure their early participation in the assessment	PIU/CIU, State Coordinators and State Implementing Partners	
2.6.4.2 Feasibility assessment for a collaboratively-led commercial aquaculture production and community training center in Kosrae state						
<b>3 Strengthening the sustainable management, protection, and resilience of marine habitats in the FSM</b>						
<b>3.1 Environmental Protection</b>						
<b>3.1.1 Community capacity building in waste management and coastal pollution</b>						
3.1.1.1 Awareness campaigns in lagoon and outer island communities including schools in Chuuk state to inform about the new waste management system	Awareness campaign	Limited community engagement and participation in waste management and coastal pollution reduction efforts		Strengthen community outreach programs through targeted awareness campaigns and educational initiatives to enhance understanding of the importance of waste management and proper disposal practices	PIU/CIU, EPA, DTPW	
3.1.1.2 Capacity building program for Chuuk Women's Council to enable expanded outreach efforts	Capacity building	Training not fit for purpose or gender appropriate		Facilitate early engagement with the Women's Council to identify needs and ensure capacity building activities are culturally and gender appropriate	PIU/CIU, Chuuk, State Coordinator Women's Council	
3.1.1.3 Awareness campaigns in Yap state to minimize waste generation and increase proper disposal	Awareness campaign	Limited community engagement and participation in waste management and coastal pollution reduction efforts		Strengthen community outreach programs through targeted awareness campaigns and educational initiatives to enhance understanding of the importance of waste management and proper disposal practices	PIU/CIU, State Coordinator, EPA, DTPW	

ACTIVITY	TYPE	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
<b>3.4 Marine Habitats Management: Legislation and Policy</b>						
<b>3.4.1 Improve emergency response protocols, pollution laws, and waste management strategies in all states</b>						
<b>For all activities and states under this component</b>		Resistance or opposition from stakeholders to changes in emergency response protocols and pollution laws		Conduct extensive stakeholder engagement and consultation processes to foster understanding and gain support for proposed changes. Clearly communicate the benefits and rationale behind the new policies and regulations	PIU/CIU, State Coordinators and State Implementing Partners	
		Insufficient resources or capacity to effectively implement and enforce the updated legislation and policies		Strengthen capacity and provide necessary resources. Provide training and technical assistance to relevant stakeholders to enhance their understanding and ability to comply with the new requirements	PIU/CIU, State Coordinators and State Implementing Partners	
		Inadequate alignment or integration of the updated legislation and policies with existing regulatory frameworks		Ensure a comprehensive review of and analysis of the existing regulatory frameworks is carried out to identify areas of alignment and potential conflicts. Foster dialogue and collaboration between different government agencies to address any jurisdictional or implementation challenges	PIU/CIU, State Coordinators and State Implementing Partners	

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## 8.2 Infrastructure Activities Impacts Risks and Mitigation strategies

Infrastructure (IN - Appendix 1) activities usually have a greater range of short term impacts and risks than the TA activities. The scale of the infrastructure activity often determines the level of impact and risk and many of the FSM PROPER IN activities are relatively small in scale. All IN activities to be undertaken (except for 3.2.1 Preparation of new landfill site at Nepukos village, Chuuk) are sited on brownfield sites that have limited ecological value. The new landfill site at Nepukos village, Chuuk, while a Greenfield site, is on land that was previously heavily modified and has recently had a landslip that has further impacted the ecological value of the site.

There are a number of purely procurement activities within the IN list. While most of these provide minimal risk and minimal mitigation strategies, the procurement of some equipment such as boats, diving equipment and enforcement equipment require a duty of care approach to their use.

The following sections and tables details the assessed impacts and risks, the mitigation strategy to be applied to reduce each impact and risks and persons/agency responsible for implementing/monitoring the mitigation strategy. The Components are presented by States. This has been done for the IN activities so State Implementing Partners can easily access the necessary information for these key investments (that also carry the greatest risks).

### 8.2.1 Infrastructure Activities at National Level and consistent across States

**Table 8.5** details the assessed impacts and risks, the mitigation strategy to be applied to reduce each impact and risks and persons/agency responsible for implementing/monitoring the mitigation strategy for those activities that are being implemented at the National level and those that are consistent across States. Some of the activities have limited design details at the time of the development of this ESMP, however the relatively small scale of the activities and a number of them being purely procurement results in limited E&S impacts and risks.

**Table 8.5** IN activity impacts/risks, mitigation strategies and responsible agency for all design phase work and for Components consistent across all States or targeted at National Level Institutions

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
For all components and activities in the design phase	Activity failure due to inadequate design	Red	Undertake sufficient research utilizing suitable technical specialists to identify appropriate sustainable technology	PIU/CIU, Design Consultants	Yellow
	Activity failure due to community not accepting activity	Red	Facilitate good community consultation to ensure community understanding and acceptance of the activity prior to bidding and implementation. Maintain a record of all consultations and provide regular feedback to communities on the status of the activity	PIU/CIU State Coordinators and Implementation Partners	Green
	Activity failure due to permits not in place	Yellow	Ensure all the legally required permits are obtained prior to undertaking the construction and this ESMP is acceptable for the State's environmental approval process	PIU/CIU and Implementation Partners	Green
	Activity failure due	Yellow	Undertake a fair and competitive tender process	PIU/CIU PMU	Green

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
	to the contracts awarded to inadequate providers		utilizing the experience of the FSM PMU	and Implementation Partners	
	Activity failure due to E&S impacts/risk and associated costs not incorporated into bidding documents		The contractor bidding documents should contain clauses on Environmental Social Health and Safety (ESHS) requirements to guide the contractor on the key requirements	PIU/CIU PMU and Implementation Partners	
<b>NATIONAL LEVEL &amp; COMPONENTS CONSISTENT ACROSS ALL STATES</b>					
<b>1.1.1 Institutional strengthening, including capacity and competency development of Competent Authority staff</b>					
1.1.1.3 Purchase of vehicles and boats for use by Competent Authority (CA) in Pohnpei, Yap and Kosrae States	OHS risks related to vehicle and boats operations		Drivers to hold valid license CIU boat operating procedures to be adopted by all CA offices using boats	PIU/CIU, CA	
<b>1.3.1 Development and application of an effective information management system (IMS) to inform decision-making for oceanic fisheries</b>					
1.3.1.2 Purchase and installation of data center equipment for IMS (e.g. data servers and cooling system)	IMS operations are compromised due to inappropriate equipment		Undertake sufficient research utilizing suitable technical specialists to identify appropriate sustainable technology	PIU/CIU, NORMA, Implementation Partners	
1.3.1.3 Software registrations for and operationalization of IMS modules	IMS operations are compromised due to inappropriate software		Undertake sufficient research utilizing suitable technical specialists ensure that the technology platform is the appropriate technology at that point in time	PIU/CIU, NORMA, Implementation Partners	
<b>1.3.2 Implementation of the Electronic Monitoring program</b>					
1.3.2.1 Procurement of software and/or subscriptions (Satlink) for the EM program	Electronic monitoring is compromised due to inappropriate software		Undertake sufficient research utilizing suitable technical specialists ensure that the technology platform is the appropriate technology at that point in time	PIU/CIU, NORMA, Implementation Partners	
1.3.2.2 Procurement of hardware (e.g. cameras, antenna, cables, computer, battery back-up) for the EM program	Electronic monitoring is compromised due to inappropriate equipment		Undertake sufficient research utilizing suitable technical specialists ensure that the technology platform is the appropriate technology at that point in time	PIU/CIU, NORMA, Implementation Partners	
1.3.2.3 Procurement of desktop computer for the EM program Data Review Center	Electronic monitoring is compromised due to inappropriate equipment		Undertake sufficient research utilizing suitable technical specialists to identify appropriate sustainable technology	PIU/CIU, NORMA, Implementation Partners	



ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
<b>1.3.3 Institutional strengthening of NORMA through improved facilities to enable expansion and remit to be carried out more effectively</b>					
1.3.3.3 Creation of new satellite offices for NORMA in the States	Inadequate design and site selection result in avoidable E&S risks		Identify all sites and develop appropriate cost effective designs Undertake a site assessment for sites that have not been identified as detailed in Appendix 5 - Site Assessment Kosrae Satellite Office Incorporate E&S impact and risk mitigations identified in each site assessment into a CESMP (Appendix 3)	PIU/CIU, NORMA, Implementation Partners	
<b>2.1.5 Improve enforcement of fisheries regulations and environmental laws through institutional capacity enhancement</b>					
2.1.5.1 Procure supplies and equipment to facilitate enforcement in Chuuk	Supplies and equipment are ineffective		Develop clear ToR for procurement that will facilitate procurement of suitable supplies and equipment	PIU/CIU, State Coordinators, Implementation Partners	
2.1.5.2 Procure supplies and equipment to facilitate enforcement in Kosrae	Inappropriate use of equipment results in risks to human rights		PIU/CIU to identify appropriate protocols including training for enforcement prior to supply of equipment	PIU/CIU, State Coordinators, Implementation Partners	
2.1.5.3 Procure supplies and equipment to facilitate enforcement in Pohnpei					
2.1.5.4 Procure supplies and equipment to facilitate enforcement in Yap					
<b>2.2.2 Improve safety and reduce losses at sea: safety equipment for small powered fishing vessels, in exchange for vessel registration and/or data.</b>					
2.2.2.1 Safety packs (e.g., life jackets, EPIRBs, VHF radios,	Safety equipment not fit for purpose or fails		Identify specialists to support the identification of appropriate safety equipment and develop clear ToR for procurement that will facilitate procurement of suitable supplies and equipment	PIU/CIU, State Coordinators, Implementation Partners	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
flashlights) for coastal fishers in Chuuk 2.2.2.2 Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Kosrae 2.2.2.3 Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Pohnpei 2.2.2.4 Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Yap	Inappropriate use of equipment or lack of training results in risks to human life		PIU/CIU to identify appropriate protocols for training of coastal fishers in the use and maintenance of equipment	PIU/CIU, State Coordinators, Implementation Partners	
<b>2.3.2 Equipment for collection and storage of fisheries and environmental data</b>					
2.3.2.1 Procurement and installation of hardware for data collection and storage in Chuuk 2.3.2.2 Procurement and installation of hardware for data collection and storage in Kosrae 2.3.2.3 Procurement and installation of hardware for data collection and storage in Pohnpei 2.3.2.4 Procurement and installation of hardware for data collection and storage in Yap	Data collection and storage is compromised due to inappropriate equipment		Undertake sufficient research utilizing suitable technical specialists ensure that the technology platform is the appropriate technology at that point in time	PIU/CIU, State Coordinators, Implementation Partners	

### 8.2.2 Infrastructure activities Kosrae

Overall the scale of IN activities in Kosrae are relatively small and site assessments have been carried out for the majority of these activities (Appendix 5). A number of the activities require

further design work and in turn will require additional site assessment as the Program progresses. These are identified in the impacts and risks column as having no design parameters. **Table 8.6** details the assessed impacts and risks, the mitigation strategy to be applied to reduce each impact and risks and persons/agency responsible for implementing/monitoring the mitigation strategy for those activities that are being implemented in Kosrae.

**Table 8.6** IN activity impacts/risks, mitigation strategies and responsible agency for Kosrae

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
<b>1.1.3 Improvement of Kosrae landing site, including installation of water purification system(s).</b>					
1.1.3.1 Improvement of Kosrae landing site, including installation of water purification system(s)	<b>NO DESIGN PARAMETERS</b>		Continue negotiations with the KPA to identify feasible activity within budget (Appendix 5 E&S Site Assessment Port Upgrades)	PIU/CIU, KPA, DHSA	
1.1.3.2 Water quality improvement at landing sites Kosrae	<b>NO DESIGN PARAMETERS</b>		Continue negotiations with the KPA to identify feasible activity within budget (Appendix 5 E&S Site Assessment Port Upgrades)	PIU/CIU, KPA, DTI, DHSA	
<b>2.1.4 Upgrades and improvements to marinas in Kosrae</b>					
2.1.4.2 Installation of floating pontoons/ jetties at Okat marina, Kosrae	Low level impacts may occur to localized marine flora and fauna on and around the rocks during the removal of all the old pontoons		Take care when removing old pontoons so as not to disturb surrounding marine substrate. Any debris that falls into the water should be removed Contractor to detail method of removal in the CESMP	PIU/CIU, State Coordinator, Contractor	
	Waste disposal		Ensure all material is recycled, any remaining unusable waste to be disposed of at the Kosrae waste landfill site (a separate site assessment has been undertaken on the landfill site and it provides a well-managed and suitable site if solid waste disposal is required)	PIU/CIU, State Coordinator, Contractor	
	Approvals not in place and activity delayed		Undertake early engagement with the community MPA Resource Management Committee (RMC) and Mayor to secure written agreements for works Ensure Environmental Clearance from KIRMA is in place prior to bidding	PIU/CIU, State Coordinator, Contractor	
	Impacts on fishers livelihoods during works		Temporary site identified for mooring boats during works Works to be undertaken over the shortest period possible, all preparatory works to be done and new pontoons in position for installation prior to old pontoons being removed Boat owners within the marina to be informed early in the process regarding the timing and schedule for works, and to be kept fully informed of the activities progress. Adequate disclosure of works commencing must be done early for boat owners to prepare moorings and move their boats	PIU/CIU, State Coordinator, Contractor	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
			Utilize Kosrae Fishing Club as another conduit for engagement		
	Poor workplace OHS leading to injury or death of contractor employees		OHS risks require ongoing management to ensure contractor employee safety. The contractor will prepare a small CESMP outlining strategies to manage OHS issues The PIU/CIU and State Coordinators will undertake routine site inspections to ensure that the onsite OHS risks are managed in line with the CESMP	PIU/CIU, State Coordinator, Contractor	
	Traffic hazards associated to proximity to the road and parking area		Demarcate the area and place signs to identify traffic hazards Contractor to detail traffic management in the CESMP	PIU/CIU, State Coordinator, Contractor	
	Failure to use local employment and businesses leads to grievances		Where possible use locals and local businesses Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site	PIU/CIU	
2.1.4.3 Installation/ improvement floating pontoons/ jetties at Lelu marina, Kosrae	There are no identifiable high level environmental risks for this site, highly modified basin, previously dredged brownfield site, no substrate impact				
	Waste disposal		Ensure all material is recycled, any remaining unusable waste to be disposed of at the Kosrae waste landfill site (a separate site assessment has been undertaken on the landfill site and it provides a well-managed and suitable site if solid waste disposal is required)	PIU/CIU, State Coordinator, Contractor	
	Approvals not in place and activity delayed		Undertake early engagement with the community MPA Resource Management Committee (RMC) and Mayor to secure written agreements for works Ensure Environmental Clearance from KIRMA is in place prior to bidding	PIU/CIU, State Coordinator, Contractor	
	Impacts on fishers livelihoods during works		Temporary site identified for mooring boats during works Works to be undertaken over the shortest period possible, all preparatory works to be done and new pontoons in position for installation prior to old pontoons being removed Boat owners within the marina to be informed early in the process regarding the timing and schedule for works, and to be kept fully informed of the activities progress. Adequate disclosure of works commencing must be done early for boat owners to prepare moorings and move their boats	PIU/CIU, State Coordinator, Contractor	
	Poor workplace OHS leading to injury or death of contractor employees		OHS risks require ongoing management to ensure contractor employee safety. The contractor will prepare a small CESMP outlining strategies to manage OHS issues The PIU/CIU and State Coordinators will undertake routine site inspections to ensure that the onsite OHS risks are managed in line with the CESMP	PIU/CIU, State Coordinator, Contractor	
	Traffic hazards associated to		Demarcate the area and place signs to identify traffic hazards	PIU/CIU, State Coordinator, Contractor	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
	proximity to the road		Contractor to detail traffic management in the CESMP		
	Failure to use local employment and businesses leads to grievances		Where possible use locals and local businesses Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site	PIU/CIU	
2.1.4.4 Installation floating pontoons/ jetties at Utwe marina, Kosrae	There are no identifiable high level environmental risks for this site, highly modified basin, previously dredged brownfield site, no substrate impact				
	Waste disposal		Ensure all material is recycled, any remaining unusable waste to be disposed of at the Kosrae waste landfill site (a separate site assessment has been undertaken on the landfill site and it provides a well-managed and suitable site if solid waste disposal is required)	PIU/CIU, State Coordinator, Contractor	
	Approvals not in place and activity delayed		Undertake early engagement with the community MPA Resource Management Committee (RMC) and Mayor to secure written agreements for works Ensure Environmental Clearance from KIRMA is in place prior to bidding	PIU/CIU, State Coordinator, Contractor	
	Impacts on fishers livelihoods during works		Temporary site identified for mooring boats during works Works to be undertaken over the shortest period possible, all preparatory works to be done and new pontoons in position for installation prior to old pontoons being removed Boat owners within the marina to be informed early in the process regarding the timing and schedule for works, and to be kept fully informed of the activities progress. Adequate disclosure of works commencing must be done early for boat owners to prepare moorings and move their boats	PIU/CIU, State Coordinator, Contractor	
	Poor workplace OHS leading to injury or death of contractor employees		Ensure all material is recycled, any remaining unusable waste to be disposed of at the Kosrae waste landfill site (a separate site assessment has been undertaken on the landfill site and it provides a well-managed and suitable site if solid waste disposal is required)	PIU/CIU, State Coordinator, Contractor	
	Failure to use local employment and businesses leads to grievances		Where possible use locals and local businesses Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site	PIU/CIU	
<b>2.3.4 Renovations of the DREA fisheries office in Kosrae</b>					
2.3.4.1 Contractor to carry out renovations of the current fisheries office	Impacts to flora and fauna		Site is a brownfield site with no significant vegetation (Appendix 5 E&S Site Assessment Renovations Kosrae DFMR Office) The contractor should ensure that there is minimal disturbance to the project site area and the storage extension will not encroach the estuary bounding the back of the site	PIU/CIU, State Coordinators, DREA-DFMR Contractor	
	Asbestos and hazardous waste		Undertake site assessment prior to renovations to identify any presence of asbestos If present, the contractor(s) undertaking works shall be required to do the following at a minimum:	PIU/CIU, DREA-DFMR	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
			<ul style="list-style-type: none"> <li>Hazardous material management to be detailed in the CESMP</li> <li>Safe removal of any asbestos-containing materials or other toxic substances shall be performed and disposed of by specially trained workers in line with the World Bank guidelines on asbestos management which includes: i) Requirements for contractors and stipulations of clauses in the tendering documents; ii) Risk assessment – determining the content of asbestos and risks of exposure incurred by workers, to assess them and to take the necessary precautions; iii) Notification to the OHS authority responsible for the work site; iv) Work plan with working instructions - lay down the technical and personal protective measures to be taken in the work plan; v) Training of contractor and workers; vi) Transport, storage and disposal of asbestos (agreements with component bodies for transportation and disposal)</li> <li>All asbestos waste and products containing asbestos is to be buried at an appropriate landfill and not to be tampered or broken down to ensure no fibers are airborne. Disposal of waste containing asbestos should be agreed with EPA</li> <li>No asbestos containing materials shall be used for construction works</li> </ul>		
	Erosion and sediment runoff		Minimize earthworks where possible, undertake necessary sediment control measures to avoid sediment runoff into the adjacent estuarine area Store soil, gravel, and sand in secure location	PIU/CIU, State Coordinators, DREA-DFMR Contractor	
	Waste disposal		Ensure demolished building material is recycled where possible, any remaining unusable waste to be disposed of at the Kosrae waste landfill site (a separate site assessment has been undertaken on the landfill site and it provides a well-managed and suitable site if solid waste disposal is required Appendix 5 - Kosrae Landfill) Control measures to be detailed in CESMP by the contractor	PIU/CIU, State Coordinators, DREA-DFMR Contractor	
	Pollution		Ensure proper handling, storage and disposal of waste oil, lubricants, oil filters and fuel from vehicles Control measures to be detailed in CESMP by the contractor	PIU/CIU, State Coordinators, DREA-DFMR Contractor	
	Construction gravel and sand		All material to be sourced from legal and registered quarry suppliers.	Contractor	
	Approvals not in place		Early engagement with the RMC and Mayor to facilitate agreement and understanding of activity Ensure Environmental Clearance from KIRMA is in place prior to bidding	PIU/CIU	
	Local traffic and construction traffic		Unlikely that there will be any access issues regarding access along the road during	PIU/CIU, State Coordinators, DREA-DFMR	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
			<p>construction, minimize any impacts to access to Lelu Marina</p> <p>Traffic should be managed through good consultation prior to the commencement of works and signs indicating any traffic hazards</p> <p>Minimize construction schedule by having all material and equipment available prior to commencement of works</p> <p>Traffic management to be detailed in the CESMP by the contractor</p>	Contractor	
	Poor workplace OHS leading to injury or death of contractor employees		<p>OHS risks require ongoing management to ensure contractor employee safety. The contractor will prepare a CESMP outlining strategies to manage OHS issues and will implement the minimum standards outlined in the CESMP.</p> <p>Contractor to conform to all OHS FSM laws and regulations</p> <p>Workers should be provided with adequate and appropriate PPE (safety helmets, shoes, gloves, mask,) and enforce on use of the PPE's</p> <p>Contractor to report immediately to the PIU any OHS incidents</p> <p>The PIU and CIU and State Coordinators will undertake routine site inspections to ensure that the onsite OHS risks are managed in line with the CESMP</p>	PIU/CIU, State Coordinators, DREA-DFMR Contractor	
	Disruption to DFMR staff activities Staff maybe injured during onsite works		Staff will be relocated to the DREA main office during the construction phase. No staff should be accessing the site until completing of works	DREA-DFMR	
	Workers cause social disruption leading to community grievances		<p>Non local workers to treat local community with respect and follow the code of practice (COP) as outlined in the CESMP</p> <p>Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site</p>	PIU/CIU, State Coordinators, DREA-DFMR Contractor	
	Failure to use local employment and businesses leads to grievances		<p>Where possible use locals and local businesses</p> <p>Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site</p>	PIU/CIU	
2.3.4.2 Re-furnishing of the renovated fisheries office including storage for radio communications equipment and servers	Furnishing not fit for purpose		Facilitate discussions with DREA to ensure that furnishings are fit for purpose and purchased locally where possible	PIU/CIU DREA-DFMR	
<b>3.1.2 Improve protection and conservation of the coastal ecosystem</b>					
3.1.2.3 Assess condition of the environmental mooring buoy	Impacts to flora and fauna		None identified, and unlikely that the repair to existing mooring sites will provide any level of environmental impact or risk. Positive outcome as removes anchor damage	PIU/CIU, State Coordinators, DREA-DFMR	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
system in Kosrae state, replace missing and upgrade damaged parts			Assessment consultancy should try and identify all existing sites and avoid putting moorings in new sites if possible Suitable mooring technology to be identified during assessment to minimize impacts to sites		
	Waste disposal		Ensure all material is recycled where possible, any remaining unusable waste to be disposed of at the Kosrae waste landfill site (a separate site assessment has been undertaken on the landfill site and it provides a well-managed and suitable site if solid waste disposal is required Appendix 5 – Kosrae Landfill)	PIU/CIU, State Coordinators, DREA-DFMR Contractor	
	Impacts on fishers and tour operators livelihoods during works		Unlikely that there will be any impacts on fishers or tour operators Notify fishers and tour operators well in advance of activities and ensure information is provided in a timely manner	PIU/CIU, State Coordinators, DREA-DFMR Contractor	
	Poor workplace OHS leading to injury or death of contractor employees		OHS risks require ongoing management to ensure contractor employee safety. The contractor will prepare a small CESMP outlining strategies to manage OHS issues particularly working from boats and diving The PIU and CIU and State Coordinators will undertake routine site inspections to ensure that the onsite OHS risks are managed in line with the CESMP	PIU/CIU, State Coordinators, Contractor	
<b>3.2.4 Improve land and marine based collection and disposal of waste</b>					
3.2.4.2 Procure equipment and advanced technologies for collection and disposal of marine waste in Kosrae	Equipment not fit for purpose		Undertake sufficient research utilizing suitable technical specialists to identify appropriate sustainable technology End users to develop operating and maintenance protocols	PIU/CIU, State Coordinators, DREA-DFMR	

### 8.2.3 Infrastructure activities Yap

Overall the scale of IN activities in Yap are relatively small and site assessments have been carried out for the majority of these activities (Appendix 6). A number of the activities require further design work and in turn may require additional site assessment as the Program progresses. These are identified in the impacts and risks column as having no design parameters. **Table 8.7** details the assessed impacts and risks, the mitigation strategy to be applied to reduce each impact and risks and persons/agency responsible for implementing/monitoring the mitigation strategy for those activities that are being implemented in Yap.

**Table 8.7** IN activity impacts/risks, mitigation strategies and responsible agency for Yap

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
<b>2.5.2 Support the installation of FADs for use by coastal communities to allow for more production from non-reef sources</b>					



ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
2.5.2.3 FAD deployment in Yap state with assistance and training from experts	<b>NO DESIGN PARAMETERS</b>		Continue negotiations with the Yap authorities to identify feasible design and sites within budget Deployment of FADS can have unique OHS challenges, assessment of risks to be undertaken once a design and sites have been selected	PIU/CIU State Coordinator, MPA Communities YAP EPA & DMR	
<b>3.1.2 Improve protection and conservation of the coastal ecosystem</b>					
3.1.2.2 Pilot restoration of existing dredging sites in Yap state	<b>NO DESIGN PARAMETERS</b> Limited funds for meaningful outcomes		Revise activity for a more meaningful community outcome (Site Assessments of Dredged Sites Appendix 6)	PIU/CIU State Coordinator, MPA Communities YAP EPA & DMR	
<b>3.2.4 Improve land and marine based collection and disposal of waste</b>					
3.2.4.4 Improve collection and proper disposal of all waste streams (including e-wastes, hazardous waste) in Yap 3.2.4.5 Shipping chemicals that are currently stored in Yap 3.2.4.6 Support public landfill site maintenance and operations in Yap	<b>NO DESIGN PARAMETERS</b>		Appendix 6 - E&S Site Assessment Yap Waste Management It is recommended that these 3 activities be combined into a single contract to revise the YAP Solid Waste Management Plan to: 1) Identify and catalogue all current stored hazardous waste and recommend practical and cost effective means of disposal of the various waste categories that is sustainable for future hazardous waste stream 2) Improve collection and proper disposal of all waste streams 3) Identification of a new landfill site and a phased program to close the current site	PIU/CIU State Coordinator, YAP EPA and DPWT	

#### 8.2.4 Infrastructure activities Chuuk

The scale of IN activities in Chuuk are relatively large compared to Kosrae and Yap as there is the development of a new landfill site and a proposal for extensive works at the Weno Marina. Site assessments have been carried out for the Chuuk activities (Appendix 7) and an Environmental Impact Assessment Statement (EIAS) has been prepared for the new landfill site (Appendix 8). Final works for the Weno Marina need to be negotiated as a recent WB report (Appendix 9) has indicated that the current budget is inadequate for all the works proposed. Additionally the proposal to rebuild the retail market building requires further discussion as this building is not fisheries related and would require substantial work and funding to compensate the current commercial users. The derelict Fish Hall at the Weno Marina also requires further design parameters for the building. **Table 8.8** details the assessed impacts and risks, the mitigation strategy to be applied to reduce each impact and risks and persons/agency responsible for implementing/monitoring the mitigation strategy for those activities that are being implemented in Chuuk.

**Table 8.8** IN activity impacts/risks, mitigation strategies and responsible agency for Chuuk

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
<b>2.1.1 Re-development of Chuuk marina (Weno) services and facilities</b>					
<p>A Pre-feasibility Study (Appendix 9) was undertaken in September 2023. This study identified the likely cost of the proposed works which was significantly more than the allocated budget in the Activity List (Appendix 1). Ongoing discussions are being undertaken to determine the scope of works within the allocated budget. Early onsite discussions from the Site Assessment (Appendix 7) indicated that the likely outcome would be the demolition of the old Fish Hall and the construction of a new building with the addition of public amenities.</p> <p>For any major works for the marina as described in the Pre-feasibility study (breakwater extension, relocation of the tetrapod's and marina basin dredging) an ESIA would be required (Pre-feasibility Study recommendation ESHIA p19). For the possibility that the construction of a new Fish Hall and public amenities is the likely outcome the likely E&amp;S impacts and risks are separated from 2.1.1.3 and detailed below.</p>					
2.1.1.2 Extension of dock at Weno marina, Chuuk to provide a suitable mooring area	There are a number of impacts & risks associated with the extension of the breakwater and development of the Weno Marina as detailed in the Pre-feasibility Report for the New Marina at Weno Port (Appendix 9) See Site Assessment Weno Port (Appendix 7)		Works need to be confirmed and an AESIA undertaken when design parameters and funding are confirmed	PIU/CIU Chuuk DMR and DTPW	
2.1.1.3 Re-development of landside facilities at Weno marina, Chuuk, including rehabilitation of existing market building and new public facilities unit	Landside facilities have <b>NO DESIGN PARAMETERS</b>		Confirm design parameters and what is to be included and undertake an Abbreviated ESIA for the Fish Hall and public facilities Vendors at the entrance road require early consultation to determine best mitigation for their continued activity during construction	PIU/CIU Chuuk DMR and DTPW	
2.1.1.4 Build of new piers at Weno marina, Chuuk, to provide additional safe moorings	Landside facilities have <b>NO DESIGN PARAMETERS</b>		To be included in 2.1.1.2 above AESIA	PIU/CIU Chuuk DMR and DTPW	
<b>Fish Hall and Public Amenities</b>	Asbestos and hazardous waste		<p>Undertake site assessment prior to demolition to identify any presence of asbestos</p> <p>If present, the contractor(s) undertaking works shall be required to do the following at a minimum:</p> <ul style="list-style-type: none"> <li>Hazardous material management to be detailed in the CESMP</li> <li>Safe removal of any asbestos-containing materials or other toxic substances shall be performed and disposed of by specially trained workers in line with the World Bank guidelines on asbestos management which includes: i) Requirements for contractors and stipulations of clauses in the tendering documents; ii) Risk assessment – determining the content of asbestos and risks of exposure incurred by workers, to assess them and to take the necessary precautions; iii) Notification to the OHS authority responsible for the work site; iv) Work plan with working instructions - lay down the technical and personal protective measures to be taken in the work plan; v) Training of</li> </ul>	PIU/CIU, State Coordinator, Contractor	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
			contractor and workers; vi) Transport, storage and disposal of asbestos (agreements with component bodies for transportation and disposal) <ul style="list-style-type: none"> <li>• All asbestos waste and products containing asbestos is to be buried at an appropriate landfill and not to be tampered or broken down to ensure no fibers are airborne. Disposal of waste containing asbestos should be agreed with EPA</li> <li>• No asbestos containing materials shall be used for construction works</li> </ul>		
	Solid Waste Demolition and construction will generate significant waste that may have E&S impacts and compromise local landfill capacity		The contractor(s) undertaking works shall implement the following at a minimum: <ul style="list-style-type: none"> <li>• Develop and follow site-specific waste management (separation of waste streams, storage, provision of bins, site clean-up, bin clean-out schedule, etc.)</li> <li>• Implement the principles of the Waste Hierarchy (Reduce, Reuse, Recycle, and Residual Disposal) The following methods for waste reduction and recycling should be utilized:               <ul style="list-style-type: none"> <li>○ Minimize waste production by reusing existing structures; initially remove materials by hand e.g. wooden floorboards, to avoid damage and excess waste; separating materials (metal, timber etc.) and storing them in piles to avoid cross contamination; ensuring safe and dry storage of salvaged items; placing clear signage on all waste separation and collection areas</li> <li>○ Recyclable materials such as packaging material etc., shall be segregated and collected on-site from other waste sources for reuse or recycle (sale)</li> <li>○ Remove scrap metal, such as roofing materials and iron rebar from concrete, for reuse off-site or metal recycling where practicable. Steel off-cuts can be recovered and sold as scrap metal</li> <li>○ Timber can be resold for utilization as fuel (non-treated) or for repairing houses in villages or outer island communities (treated)</li> <li>○ On-site and off-site transportation of waste should be conducted to prevent or minimize spills, releases, and exposures to employees and the public</li> <li>○ Use litter bins, containers and waste collection facilities at all places during works</li> <li>○ Store solid waste temporarily on site in a designated place prior to off-site transportation and disposal</li> </ul> </li> </ul>	PIU/CIU, State Coordinator, Contractor	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
			<ul style="list-style-type: none"> <li>• Dispose of waste only at designated permitted landfill. Open burning or burial of solid waste on the construction site shall not be allowed</li> <li>• Minimize hazardous waste generation by ensuring hazardous waste is not co-mingled with non-hazardous waste. Collect, transport and disposal of hazardous waste to licensed/permitted hazardous waste sites only following GIIP for the waste being handled</li> <li>• Include in the induction training the segregation of wastes</li> </ul>		
	Air quality, noise, and vibration generated during demolition and construction		<p>The contractor(s) is responsible for compliance with all relevant national and state standards with respect to noise and vibration and ambient air quality.</p> <p><b>Noise and vibration</b></p> <p>The contractor(s) undertaking works shall implement the following at a minimum:</p> <ul style="list-style-type: none"> <li>• Plan activities in consultation with communities so that noisiest activities are restricted to being undertaken during periods that will result in least disturbance</li> <li>• Noise levels should be maintained within the national permissible limits/standards</li> <li>• Minimize transportation of demolition waste and construction materials through community areas during regular working time</li> </ul> <p><b>Air Quality</b></p> <p>The contractor(s) undertaking works shall implement dust suppression measures (e.g. covering of material stockpiles &amp; watering) as required. At a minimum the following is required:</p> <ul style="list-style-type: none"> <li>• Materials used shall be covered and secured properly during transportation to prevent scattering of soil, sand, materials, or generating dust</li> <li>• Keep stockpiles of aggregate materials covered to avoid suspension or dispersal of fine soil particles during windy days or disturbance from stray animals</li> <li>• Minimize dust from exposed work sites, roads and stockpiles by applying water on the ground regularly and reducing speed</li> <li>• No burning of site waste materials</li> </ul>	PIU/CIU, State Coordinator, Contractor	
	Resource efficiency issues, including materials supply and extraction of raw materials		<p>The contractor(s) undertaking works shall at a minimum:</p> <ul style="list-style-type: none"> <li>• Source raw materials and construction materials locally and from licensed/permitted facilities only</li> <li>• Use recycled or renewable building materials (e.g. timber) where possible</li> </ul>	PIU/CIU, State Coordinator, Contractor	
	Impacts on local communities from traffic obstruction,		<p>The contractor(s) undertaking works shall implement the following at a minimum:</p>	PIU/CIU, State Coordinator, Contractor	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
	congestion, and traffic and road safety	Green	<ul style="list-style-type: none"> <li>Minimize the extent of traffic and construction impacts on adjacent urban areas and villages (landfill site) and other residential areas where possible</li> <li>All traffic signs used for the warning or direction of traffic at road works sites shall comply with appropriate traffic regulations.</li> <li>Implement dust suppression measures if required</li> </ul>		Green
	Flora and fauna and marine water quality	Green	The site is a highly modified brownfield site (see Weno Marina site assessment Appendix 7) with very limited environmental impacts and risks Contractor to prevent any waste material from entering the marina basin	PIU/CIU, State Coordinator, Contractor	Green
	Occupational Health and Safety (OHS) risks for workers from civil works	Red	<p>OHS risks require ongoing management to ensure contractor employee safety. The contractor will prepare a CESMP outlining strategies to manage OHS issues and will implement the minimum standards outlined in the CESMP.</p> <p>Contractor to conform to all OHS FSM laws and regulations</p> <p>The contractor(s) undertaking works shall comply with all national and good practice regulations and GIIP regarding workers' safety, such as OHS section of the <a href="#">IFC EHS Guidelines on Construction and Decommissioning</a>, and implement the following at a minimum:</p> <ul style="list-style-type: none"> <li>Develop and follow a site-specific OHS management strategies that deal with at a minimum those issues detailed in the CESMP Table 5.2</li> <li>Appoint a health and safety officer at site, who will have the authority to issue directives for the purpose of maintaining the health and safety of all personnel authorized to enter and or work on the site</li> <li>Prepare and implement a simple action plan to cope with risk and emergency (e.g., fire, storm surge, cyclone, COVID-19 outbreak)</li> <li>Work site induction on occupational safety regulations and use of PPE during work site induction</li> <li>Undertake training of staff to meet standards for the proper operation and use of equipment</li> <li>Training and use of temporary fall prevention devices, such as rails or other barriers able to support a weight of 200 pounds, when working at heights equal or greater than two meters (e.g. on scaffolding)</li> <li>Use of control zones and safety monitoring systems to warn workers of their proximity to fall hazard zones, as well as securing, marking, and labelling covers for openings in floors, roofs, or walking surfaces</li> </ul>	PIU/CIU, State Coordinator, Contractor	Yellow

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
			<ul style="list-style-type: none"> <li>• Take protective measures to prevent accidents such as: implementing good house-keeping practices, such as the sorting and placing loose construction materials or demolition debris in established areas away from foot paths               <ul style="list-style-type: none"> <li>○ Locating electrical cords and ropes in common areas and marked corridors</li> <li>○ Planning and segregating the location of vehicle traffic, machine operation, and walking areas, and controlling vehicle traffic through the use of one-way traffic routes, establishment of speed limits, and on-site trained flag-people wearing high-visibility vests or outer clothing covering to direct traffic</li> </ul> </li> <li>• Provide adequate sanitation facilities serving all workers at the construction sites</li> <li>• Ensure onsite worker sanitation facilities be properly operated and maintained to collect and dispose of wastewater</li> <li>• Provide project workers with accessible means to raise workplace concerns (refer to Project LMP - Workers GRM)</li> </ul> <p>The PIU and CIU will undertake routine site inspections to ensure that the onsite OHS risks are managed in line with the CESMP</p>		
	Health and safety risks for community		<p>The contractor(s) undertaking works shall implement the following at a minimum:</p> <ul style="list-style-type: none"> <li>• Implement traffic management as detailed in the CESMP</li> <li>• Comply with all national and good practice regulations regarding workers' safety and the Project's LMP</li> <li>• Take protective measures to prevent accidents such as:               <ul style="list-style-type: none"> <li>○ Barriers to prevent unauthorized access to worksite</li> </ul> </li> <li>• Provide safe access routes and other safety measures as appropriate during works</li> <li>• Communicate risks and community safety mitigation measures to project stakeholders and communities</li> </ul>	PIU/CIU, State Coordinator, Contractor	
	Impact on local vendors livelihood		<p>PIU/CIU and local authorities to engage early those vendors situated along the road near the site entrance</p> <p>Establish agreement with all vendors on proposed mitigation strategies of either:</p> <ul style="list-style-type: none"> <li>• Remaining in current location (see Site Assessment Appendix 7) with traffic management that maintains a safe distance from vendors and their clients</li> <li>• Move to a nearby location further away from construction traffic with no detrimental effects on their livelihoods</li> <li>• If temporary relocation during works is required and impacts the economic situation</li> </ul>	PIU/CIU, State Coordinator, Contractor	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
		Yellow	of the vendors then the CIU safeguards team will prepare, adopt and implement an Abbreviated Resettlement Action Plan (ARAP) before carrying out the associated activities based on the guiding principles outlined in Appendix 4.		Green
	Community grievances	Green	Contractor to include contact numbers for community grievances on worksite signs Refer any grievances received by the community or local businesses to the local PIU who will coordinate the Grievance Redress Mechanism (detailed in the SEP)	PIU/CIU, State Coordinator, Contractor	Green
	Failure to use local employment and businesses leads to grievances	Green	Where possible use locals and local businesses Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site	PIU/CIU	Green
<b>2.2.4 Enhance Chuuk state NavAids (beacon markers for channels)</b>					
2.2.4.1 Firm to assess NavAids needs, and procure and install NavAids in high traffic/danger areas in Chuuk state	<b>NO DESIGN PARAMETERS Requires the assessment of needs before any E&amp;S assessment can be undertaken</b>		Develop design parameters and site locations during needs assessment and identify any E&S impacts and risks during this assessment	PIU/CIU Chuuk DTPW	
2.3.2.5 Vehicle for Chuuk DMR to enable data collection from fish markets in Weno	Equipment not fit for purpose	Green	Undertake consultation with Chuuk DMR to identify appropriate vehicle	PIU/CIU Chuuk DMR	Green
	Operation of vehicle leads to injury or death	Yellow	DMR to ensure vehicle is only operated by a licensed driver and in a safe manner	Chuuk DMR	Green
<b>3.2.1 Phase one (concurrent with phase two): Preparation of new landfill site at Nepukos village, Chuuk</b>					
<p>An Environmental Impact Assessment Statement has been prepared (22 March 2021) and approved by the Chuuk State EPA (Appendix 8). However, this Statement focuses on determining the preferred site from 4 options and while identifying some of the key impacts and risks provides little guidance on mitigation strategies. It is recommend that this Statement be revised and updated with additional assessment to include:</p> <ul style="list-style-type: none"> <li>a) Phase one (3.2.1): The impacts and risks of the new landfill site and the mitigation strategies required to mitigate these impacts and risks. The impacts and risks identified from the Site Assessment (Appendix 7) and the mitigation strategies listed below should be included. Additional consultation with nearby residents needs to be included to facilitate a position where no future community grievances will be submitted when works start or for the operation of the site</li> <li>b) Phase 2 (3.2.2): The impacts and risks of the relocation of waste from the temporary site. The impacts and risks identified from the Site Assessment (Appendix 7) and the mitigation strategies listed below should be included.</li> <li>c) Phase 3 (3.2.3): The impacts and risks of the final capping and closure of the old landfill site, any management of residual issues (such as leachate) and the construction of the new waste management facility. The impacts and risks identified from the Site Assessment (Appendix 7) and the mitigation strategies listed below should be included.</li> </ul>					
3.2.1.1 Vegetation strip, taking down to composting site (initial preparation)	Flora and fauna Area has been previously cleared and impacted by landslip and has low ecological values	Yellow	Contractor to clearly demarcate the limits of clearing and ensure that no vegetation is removed outside of this area Ensure all vegetation is mulched or composited, any useable timber should be salvaged	PIU/CIU, State Coordinator, EPA, Contractor	Green

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
	Traffic		Facilitate the completion of the road by ADB prior to works commencing Notify residents along the transport route of work schedule and potential hazards from trucks removing vegetation	PIU/CIU, State Coordinator, EPA, Contractor	
	Health and safety risks for community		The contractor(s) undertaking works shall implement the following at a minimum: <ul style="list-style-type: none"> <li>• Implement traffic management as detailed in the CESMP</li> <li>• Comply with all national and good practice regulations regarding workers' safety and the Project's LMP</li> <li>• Take protective measures to prevent accidents such as barriers to prevent unauthorized access to worksite</li> <li>• Communicate risks and community safety mitigation measures to project stakeholders and communities</li> </ul>	PIU/CIU, State Coordinator, Contractor	
	Workplace OHS		OHS risks require ongoing management to ensure contractor employee safety. The contractor will prepare a CESMP outlining strategies to manage OHS issues and will implement the minimum standards outlined in the CESMP. Contractor to conform to all OHS FSM laws and regulations <ul style="list-style-type: none"> <li>• Develop and follow a site-specific OHS management strategies that deal with at a minimum those issues detailed in the CESMP Table 5.2</li> <li>• Appoint a health and safety officer at site, who will have the authority to issue directives for the purpose of maintaining the health and safety of all personnel authorized to enter and or work on the site</li> <li>• Prepare and implement a simple action plan to cope with risk and emergency (e.g., fire, storm surge, cyclone, COVID-19 outbreak)</li> <li>• Training on occupational safety regulations and use of PPE during work site induction</li> <li>• Undertake training of staff to meet standards for the proper operation and use of equipment</li> <li>• Provide adequate sanitation facilities serving all workers at the construction sites</li> <li>• Ensure onsite worker sanitation facilities be properly operated and maintained to collect and dispose of wastewater</li> <li>• Provide project workers with accessible means to raise workplace concerns (refer to Project LMP Workers GRM)</li> </ul> The PIU and CIU will undertake routine site inspections to ensure that the onsite OHS risks are managed in line with the CESMP	PIU/CIU, State Coordinator, Contractor	



ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
	Community grievances		Contractor to include contact numbers for community grievances on worksite signs Refer any grievances received by the community or local businesses to the local PIU who will coordinate the Grievance Redress Mechanism (detailed in the SEP)	PIU/CIU, State Coordinator, Contractor	
3.2.1.2 Build of new access road to Nepukos village site	This work will be undertaken with ADB finance E&S impacts and risks to be managed by ADB		Facilitate the completion of the road prior to works commencing Liaise with ADB to coordinate activities Facilitate ADB Project notification of local residents of the proposed works and schedule of works	PIU/CIU, State Coordinator	

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ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
3.2.1.3 Preparation of new landfill site for public use (e.g., bays, parking, etc.)  3.2.1.4 Liner and leachate installation at new landfill site	Water quality, erosion and sediment runoff		The contractor will ensure proper demarcation of the area to be affected by the works Works to limit any additional vegetation removal at the site Any excavation activities should not interfere with local drainage or introduce physical changes that are not in harmony with the physical setting of the area Retention of grass, herbaceous plants, shrubs and trees, to the extent possible on the site Drainage system to divert storm water around the facility and keep storm water free from contact with waste to be included in design Any additional measures to be included in the CESMP by the contractor	PIU/CIU, State Coordinator, Contractor	
	Pollution		Ensure proper handling, storage and disposal of waste oil, lubricants, oil filters and fuel from machinery Guidance to be included in the CESMP	PIU/CIU, State Coordinator, Contractor	
	Noise and vibration		Undertake works at suitably agreed times that do not impact the community adversely Observe a common-sense approach to vehicle use, and encourage drivers to switch off vehicle engines when not in use Provision of appropriate PPE (hearing protection ear muffs) to the workers and any other person visiting the site Site signs to include contacts for GRM (See the SEP) Guidance to be included in the CESMP	PIU/CIU, State Coordinator, Contractor	
	Traffic and dust		Reduce speed when transiting through communities to reduce dust and traffic accidents Restrict traffic or water dusty areas during dry dusty periods	PIU/CIU, State Coordinator, Contractor	
	Community grievances		Contractor to include contact numbers for community grievances on worksite signs Refer any grievances received by the community or local businesses to the local PIU who will coordinate the GRM (detailed in the SEP)	PIU/CIU, State Coordinator, Contractor	
	Failure to use local employment and businesses leads to grievances		Where possible use local employment and local businesses Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site	PIU/CIU	
<b>3.2.2 Phase two (concurrent with phase one): Sorting and clearance of interim marina waste site in Weno, Chuuk</b>					
3.2.2.1 Sorting and clearance of interim marina site, transport of pure landfill to new site	Water quality,		Contractor to minimize any waste spilling into marine environment during removal	PIU/CIU, State Coordinator, Contractor	
	Noise and vibration		Undertake works at suitably agreed times that do not impact the community adversely Observe a common-sense approach to vehicle use, and encourage drivers to switch off vehicle engines when not in use Provision of appropriate PPE (hearing protection ear muffs) to the workers and any other person visiting the site	PIU/CIU, State Coordinator, Contractor	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
		Green	Site signs to include contacts for GRM (See the SEP) Guidance to be included in the CESMP		Green
	Pollution	Green	Ensure proper handling, storage and disposal of waste oil, lubricants, oil filters and fuel from machinery Guidance to be included in the CESMP	PIU/CIU, State Coordinator, Contractor	Green
	Workplace OHS	Red	OHS risks require ongoing management to ensure contractor employee safety. The contractor will prepare a CESMP outlining strategies to manage OH&S issues and will implement the minimum standards outlined in the CESMP. Contractor to conform to all OHS FSM laws and regulations The contractor(s) undertaking works shall comply with all national and good practice regulations and GIIP regarding workers' safety, such as OHS section of the <a href="#">IFC EHS Guidelines on Construction and Decommissioning</a> , and implement the following at a minimum: <ul style="list-style-type: none"> <li>• Develop and follow a site-specific OHS management strategies that deal with at a minimum those issues detailed in the CESMP Table 5.2</li> <li>• Appoint a health and safety officer at site, who will have the authority to issue directives for the purpose of maintaining the health and safety of all personnel authorized to enter and or work on the site</li> <li>• Prepare and implement a simple action plan to cope with risk and emergency (e.g., fire, storm surge, cyclone, COVID-19 outbreak)</li> <li>• Training on occupational safety regulations and use of PPE during work site induction</li> <li>• Undertake training of staff to meet standards for the proper operation and use of equipment</li> <li>• Provide adequate sanitation facilities serving all workers at the site</li> <li>• Ensure onsite worker sanitation facilities be properly operated and maintained to collect and dispose of wastewater</li> <li>• Provide project workers with accessible means to raise workplace concerns (refer to Project LMP Workers GRM)</li> </ul> The PIU and CIU will undertake routine site inspections to ensure that the onsite OHS risks are managed in line with the CESMP	PIU/CIU, State Coordinator, Contractor	Yellow
	Traffic	Yellow	Develop a traffic management strategy to be included in the CESMP to facilitate: <ul style="list-style-type: none"> <li>• Safe entry and exit of trucks removing the material</li> <li>• Safe entry and exits at disposal site</li> <li>• Community engagement to notify them of traffic hazards and schedules</li> </ul>	PIU/CIU, State Coordinator, Contractor	Green

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
		Yellow	<ul style="list-style-type: none"> <li>Avoid heavy traffic movement during school pickup and drop off hours</li> <li>Onsite management of trucks and loaders</li> <li>Trucks to either be covered or filled to a level that prevents any spillage of material while in transit</li> </ul>		Green
	Failure to use local employment and businesses leads to grievances	Green	Where possible use local employment and local businesses Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site	PIU/CIU	Green
	Community grievances	Green	Contractor to include contact numbers for community grievances on worksite signs Refer any grievances received by the community or local businesses to the local PIU who will coordinate the GRM (detailed in the SEP)	PIU/CIU, State Coordinator, Contractor	Green
3.2.3.1 Renewal/ upgrade of road to old landfill site (Neauo)	Risk of adjacent land owner/user objection to proposed works	Yellow	Road works designed in consultation with adjacent landowners Existing alignment to be utilised with no loss of land to adjacent residents or landowners Final works and schedule of works to be communicated to all stakeholders prior to commencement of works Any temporary loss of access due to works to be clearly communicated to all stakeholders well in advance	PIU/CIU, Chuuk DPWT	Green
	Loss or modification of stream and coastal areas habitats	Yellow	Design sufficient drainage under the road to facilitate movement of tidal water Design of drainage to minimize potential erosion	PIU/CIU, State Coordinator, Contractor, Chuuk DPWT	Green
	Construction gravel and sand	Yellow	All material to be sourced from legal and registered quarry suppliers.	PIU/CIU, State Coordinator, Contractor, Chuuk DPWT	Green
	Dust creating nuisance (and potential health issues) where works occur in close proximity to adjacent residential / commercial properties.	Green	The number and size of stockpiles shall be minimized, and have appropriate containment to prevent dust discharges Dust suppression (i.e. a water cart, or similar) shall be used to dampen active work areas and stockpiles in dry conditions.	PIU/CIU, State Coordinator, Contractor, Chuuk DPWT	Green
	Noise and vibration	Green	Undertake works at suitably agreed times that do not impact the community adversely Observe a common-sense approach to vehicle use, and encourage drivers to switch off vehicle engines when not in use Provision of appropriate PPE (hearing protection ear muffs) to the workers and any other person visiting the site Site signs to include contacts for GRM (See the SEP) Guidance to be included in the CESMP	PIU/CIU, State Coordinator, Contractor, Chuuk DPWT	Green

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
	Pollution		Ensure proper handling, storage and disposal of waste oil, lubricants, oil filters and fuel from machinery Guidance to be included in the CESMP	PIU/CIU, State Coordinator, Contractor, Chuuk DPWT	
	Community grievances		Contractor to include contact numbers for community grievances on worksite signs Refer any grievances received by the community or local businesses to the local PIU who will coordinate the GRM (detailed in the SEP)	PIU/CIU, State Coordinator, Contractor	
3.2.3.3 Land preparation and preparation of sub-structure and fencing	Risk of land adjacent owner/user objection to proposed works		Proposed works and schedule disclosed to adjacent landowners in advance of work commencing There will be no loss of land or access to adjacent residents or landowners Any temporary loss of access due to works to be clearly communicated to all stakeholders well in advance	PIU/CIU, State Coordinator, EPA, Contractor, Chuuk DPWT	
3.2.3.4 Installation of basic utilities (electricity and water) at site	Impacts to flora and fauna		Site is a brownfield site (old landfill) with no significant vegetation (Appendix 5 E&S Site Assessment Waste Management Facility) Contractor to clearly demarcate the limits of clearing and ensure that no vegetation is removed outside of this area Ensure all vegetation is mulched or composted, any useable timber should be salvaged	PIU/CIU, State Coordinator, EPA, Contractor	
3.2.3.5 Build of steel framed, high-specification solid waste management building	Erosion and sediment runoff		Minimize earthworks where possible, undertake necessary sediment control measures to avoid sediment runoff into the adjacent estuarine area Store soil, gravel, and sand in secure location Design to include drainage to minimize impacts on surrounding wetlands	PIU/CIU, State Coordinator, EPA, Contractor	
3.2.3.6 Climate-proofing of new building	Waste disposal		The contractor(s) undertaking works shall implement the following at a minimum: <ul style="list-style-type: none"> <li>• Develop and follow site-specific waste management (separation of waste streams, storage, provision of bins, site clean-up, bin clean-out schedule, etc.)</li> <li>• Implement the principles of the Waste Hierarchy (Reduce, Reuse, Recycle, and Residual Disposal) The following methods for waste reduction and recycling should be utilized: <ul style="list-style-type: none"> <li>○ Recyclable materials such as packaging material etc., shall be segregated and collected on-site from other waste sources for reuse or recycle (sale)</li> <li>○ On-site and off-site transportation of waste should be conducted to prevent or minimize spills, releases, and exposures to employees and the public</li> <li>○ Use litter bins, containers and waste collection facilities at all places during works</li> <li>○ Store solid waste temporarily on site in a designated place prior to off-site transportation and disposal</li> </ul> </li> </ul>	PIU/CIU, State Coordinator, EPA, Contractor	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
			<ul style="list-style-type: none"> <li>Dispose of waste only at designated permitted landfill. Open burning or burial of solid waste on the construction site shall not be allowed</li> <li>Minimize hazardous waste generation by ensuring hazardous waste is not co-mingled with non-hazardous waste. Collect, transport and disposal of hazardous waste to licensed/permitted hazardous waste sites only following GIIP for the waste being handled</li> <li>Include in the induction training the segregation of wastes.</li> </ul>		
	Pollution		<p>Ensure proper handling, storage and disposal of waste oil, lubricants, oil filters and fuel from vehicles</p> <p>Control measures to be detailed in CESMP by the contractor</p>	PIU/CIU, State Coordinator, EPA, Contractor	
	Construction gravel and sand		All material to be sourced from legal and registered quarry suppliers.	PIU/CIU, State Coordinator, EPA, Contractor	
	Approvals not in place		<p>Early engagement with the RMC and Mayor to facilitate agreement and understanding of activity</p> <p>Ensure Environmental Clearance from EPA is in place prior to bidding</p>	PIU/CIU, State Coordinator, EPA, Contractor	
	Local traffic and construction traffic		<p>Unlikely that there will be any access issues regarding access along the road during construction, minimize any impacts to access to Weno Marina</p> <p>Traffic should be managed through good consultation prior to the commencement of works and signs indicating any traffic hazards</p> <p>Minimize construction schedule by having all material and equipment available prior to commencement of works</p> <p>Traffic management to be detailed in the CESMP by the contractor</p>	PIU/CIU, State Coordinator, Contractor	
	Poor workplace OHS leading to injury or death of contractor employees		<p>OHS risks require ongoing management to ensure contractor employee safety. The contractor will prepare a CESMP outlining strategies to manage OH&amp;S issues and will implement the minimum standards outlined in the CESMP.</p> <p>Contractor to conform to all OHS FSM laws and regulations</p> <p>The contractor(s) undertaking works shall comply with all national and good practice regulations and GIIP regarding workers' safety, such as OHS section of the <a href="#">IFC EHS Guidelines on Construction and Decommissioning</a>, and implement the following at a minimum:</p> <ul style="list-style-type: none"> <li>Develop and follow a site-specific OHS management strategies that deal with at a minimum those issues detailed in the CESMP Table 5.2</li> </ul>	PIU/CIU, State Coordinator, Contractor	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
			<ul style="list-style-type: none"> <li>Appoint a health and safety officer at site, who will have the authority to issue directives for the purpose of maintaining the health and safety of all personnel authorized to enter and or work on the site</li> <li>Prepare and implement a simple action plan to cope with risk and emergency (e.g., fire, storm surge, cyclone, COVID-19 outbreak)</li> <li>Training on occupational safety regulations and use of PPE during work site induction</li> <li>Undertake training of staff to meet standards for the proper operation and use of equipment</li> <li>Provide adequate sanitation facilities serving all workers at the site</li> <li>Ensure onsite worker sanitation facilities be properly operated and maintained to collect and dispose of wastewater</li> <li>Provide project workers with accessible means to raise workplace concerns (refer to Project LMP Workers GRM)</li> </ul> <p>The PIU and CIU will undertake routine site inspections to ensure that the onsite OHS risks are managed in line with the CESMP</p>		
	Workers cause social disruption leading to community grievances		<p>Non local workers to treat local community with respect and follow the code of practice (COP) as outlined in the CESMP</p> <p>Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site</p>	PIU/CIU, State Coordinator, Contractor	
	Failure to use local employment and businesses leads to grievances		<p>Where possible use locals and local businesses</p> <p>Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site</p>	PIU/CIU, Contractor	
	Community grievances		<p>Contractor to include contact numbers for community grievances on worksite signs</p> <p>Refer any grievances received by the community or local businesses to the local PIU who will coordinate the GRM (detailed in the SEP)</p>	PIU/CIU, State Coordinator, Contractor	
3.2.3.7 Purchase of the required machinery for the new building	Equipment not fit for purpose		<p>Undertake sufficient research utilizing suitable technical specialists to identify appropriate sustainable technology</p> <p>Undertake consultation with EPA to ensure equipment is suitable and manageable with the local capacity</p>	PIU/CIU, EPA	
	Operation of equipment leads to injury or death		EPA to develop operational procedures and train operators prior to installation of equipment	PIU/CIU, EPA	
3.2.4 Improve land and marine based collection and disposal of waste	Community expectations not met leading to community lack of support or grievances		Facilitate good community consultation on the type and location of collection and collection sites	PIU/CIU, EPA	
3.2.4.1 Install community bins/collection					

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
points including for lagoon and outer islands in Chuuk					

### 8.2.5 Infrastructure activities Pohnpei

The scale of IN activities in Pohnpei are relatively large compared to Kosrae and Yap (similar to Chuuk) as there is the development of two new buildings (NORMA and Reference Laboratory) and significant works in the development of the new marina and fisheries hub at Dekehtik. Site assessments have been carried out for the Pohnpei activities (Appendix 10) and a Pre – feasibility Study (Sept.2023) has been prepared for the development of the new marina and fisheries hub at Dekehtik (Appendix 11).

With regards to the NORMA building there are ongoing discussions regarding the likely ownership of the CA, the site of the NORMA building and the possibility of the NORMA building and the Reference Laboratory building being combined. This ESMP has been prepared on the current position and sites for the NORMA Building and the Reference Laboratory and the ownership of the CA with the Department of Health and Social Affairs (DHSA).

**Table 8.9** details the assessed impacts and risks, the mitigation strategy to be applied to reduce each impact and risks and persons/agency responsible for implementing/monitoring the mitigation strategy for those activities that are being implemented in Pohnpei.

**Table 8.9** IN activity impacts/risks, mitigation strategies and responsible agency for Pohnpei

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
<b>1.2.1 Establishment of a Reference Laboratory.</b>					
1.2.1.4 Design and construction of a new multi-purpose Reference Laboratory building	Agreements on ownership of the CA delay implementation		Facilitate early discussions to reach consensus on CA ownership and merging NORMA building with Reference Laboratory	PIU/CIU, NORMA, DHSA	
	Feasibility study reveals significant challenges or limitations in establishing a Reference Laboratory		Conduct a comprehensive feasibility study, engage technical experts, and explore alternative solutions or partnerships to address any challenges identified	PIU/CIU, DTCI, DHSA	
	Impacts to flora and fauna		Site is a brownfield site with regrowth dominating the area. (Appendix 10 E&S Site Assessment Reference Laboratory) There are a number of large trees at the northern end of the site which should be left undisturbed if feasible The contractor should ensure that there is minimal disturbance to the project site area and the storage extension will not encroach the estuary bounding the back of the site	PIU/CIU, State Coordinator, DTCI, DHSA Contractor	



ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
	Erosion and sediment runoff		Minimize earthworks where possible, undertake necessary sediment control measures to avoid sediment runoff into the water course at the back of the site Store soil, gravel, and sand in secure location	PIU/CIU, State Coordinator, Contractor	
	Waste disposal		Ensure building material is recycled where possible, any remaining waste to be disposed of at permitted landfills Waste management control measures to be detailed in CESMP	PIU/CIU, State Coordinator, Contractor	
	Pollution		Ensure proper handling, storage and disposal of waste oil, lubricants, oil filters and fuel from vehicles Control measures to be detailed in CESMP by the contractor	PIU/CIU, State Coordinator, Contractor	
	Construction gravel and sand		All material to be sourced from legal and registered quarry suppliers	Contractor	
	Approvals not in place		Early engagement with the CA and NORMA to facilitate agreement Ensure Environmental Permit from EPA is in place prior to bidding	PIU/CIU, State Coordinator, NORMA, DHSA	
	Local traffic and construction traffic		Unlikely that there will be any access issues regarding access along the road during construction Traffic should be managed through good consultation prior to the commencement of works and signs indicating any traffic hazards Minimize construction schedule by having all material and equipment available prior to commencement of works Traffic management to be detailed in the CESMP by the contractor	PIU/CIU, State Coordinator, Contractor	
	Poor workplace OHS leading to injury or death of contractor employees		OHS risks require ongoing management to ensure contractor employee safety. The contractor will prepare a CESMP outlining strategies to manage OH&S issues and will implement the minimum standards outlined in the CESMP. Contractor to conform to all OHS FSM laws and regulations The contractor(s) undertaking works shall comply with all national and good practice regulations and GIIP regarding workers' safety, such as OHS section of the <a href="#">IFC EHS Guidelines on Construction and Decommissioning</a> , and implement the following at a minimum: <ul style="list-style-type: none"> <li>Develop and follow a site-specific OHS management strategies that deal with at a minimum those issues detailed in the CESMP Table 5.2</li> <li>Appoint a health and safety officer at site, who will have the authority to issue directives for the purpose of maintaining the health and safety of all personnel authorized to enter and or work on the site</li> </ul>	PIU/CIU, State Coordinator, Contractor	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
			<ul style="list-style-type: none"> <li>Prepare and implement a simple action plan to cope with risk and emergency (e.g., fire, storm surge, cyclone, COVID-19 outbreak)</li> <li>Training on occupational safety regulations and use of PPE during work site induction</li> <li>Undertake training of staff to meet standards for the proper operation and use of equipment</li> <li>Provide adequate sanitation facilities serving all workers at the site</li> <li>Ensure onsite worker sanitation facilities be properly operated and maintained to collect and dispose of wastewater</li> <li>Provide project workers with accessible means to raise workplace concerns (refer to Project LMP Workers GRM)</li> </ul> <p>The PIU and CIU will undertake routine site inspections to ensure that the onsite OHS risks are managed in line with the CESMP</p>		
	Workers cause social disruption leading to community grievances		<p>Non local workers to treat local community with respect and follow the COC as outlined in the CESMP</p> <p>Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site</p>	PIU/CIU, State Coordinator, Contractor	
	Failure to use local employment and businesses leads to grievances		<p>Where possible use locals and local businesses</p> <p>Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site</p>	PIU/CIU, State Coordinator, Contractor	
	Community grievances		<p>Contractor to include contact numbers for community grievances on worksite signs</p> <p>Refer any grievances received by the community or local businesses to the local PIU who will coordinate the GRM (detailed in the SEP)</p>	PIU/CIU, State Coordinator, Contractor	
1.3.3.2 Construction of the new NORMA office building	Agreements on ownership of the CA delay implementation		Facilitate early discussions to reach consensus on CA ownership and merging NORMA building with Reference Laboratory	PIU/CIU, NORMA, DHSA	
	Impacts to flora and fauna		<p>Site is a brownfield site that is already cleared (Appendix 10 E&amp;S Site Assessment NORMA Building)</p> <p>The contractor should ensure that there is minimal disturbance to the project site area and the storage extension will not encroach the estuary bounding the back of the site</p>	PIU/CIU, DTCI, DHSA, State Coordinator, Contractor	
	Erosion and sediment runoff		<p>Minimize earthworks where possible, undertake necessary sediment control measures to avoid sediment runoff into the water course at the back of the site</p> <p>Store soil, gravel, and sand in secure location</p>	PIU/CIU, State Coordinator, Contractor	
	Waste disposal		<p>Ensure building material is recycled where possible, any remaining waste to be disposed of at permitted landfill s</p> <p>Waste management control measures to be detailed in CESMP</p>	PIU/CIU, State Coordinator, Contractor	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
	Pollution	Green	Ensure proper handling, storage and disposal of waste oil, lubricants, oil filters and fuel from vehicles Control measures to be detailed in CESMP by the contractor	PIU/CIU, State Coordinator, Contractor	Green
	Construction gravel and sand	Yellow	All material to be sourced from legal and registered quarry suppliers	Contractor	Green
	Approvals not in place	Yellow	Early engagement with the CA and NORMA to facilitate agreement Ensure Environmental Permit from EPA is in place prior to bidding	PIU/CIU, NORMA, DHSA	Green
	Local traffic and construction traffic	Green	Unlikely that there will be any access issues regarding access along the road during construction Traffic should be managed through good consultation prior to the commencement of works and signs indicating any traffic hazards Minimize construction schedule by having all material and equipment available prior to commencement of works Traffic management to be detailed in the CESMP by the contractor	PIU/CIU, State Coordinator, Contractor	Green
	Poor workplace OHS leading to injury or death of contractor employees	Red	OHS risks require ongoing management to ensure contractor employee safety. The contractor will prepare a CESMP outlining strategies to manage OHS issues and will implement the minimum standards outlined in the CESMP. Contractor to conform to all OHS FSM laws and regulations Workers should be provided with adequate and appropriate PPE (safety helmets, shoes, gloves, mask,) and enforce on use of the PPE's Contractor to report immediately to the PIU any OHS incidents The contractor(s) undertaking works shall comply with all national and good practice regulations and GIIP regarding workers' safety, such as OHS section of the <a href="#">IFC EHS Guidelines on Construction and Decommissioning</a> , and implement the following at a minimum: <ul style="list-style-type: none"> <li>• Develop and follow a site-specific OHS management strategies that deal with at a minimum those issues detailed in the CESMP Table 5.2</li> <li>• Appoint a health and safety officer at site, who will have the authority to issue directives for the purpose of maintaining the health and safety of all personnel authorized to enter and or work on the site</li> <li>• Prepare and implement a simple action plan to cope with risk and emergency (e.g., fire, storm surge, cyclone, COVID-19 outbreak)</li> <li>• Training on occupational safety regulations and use of PPE during work site induction</li> <li>• Undertake training of staff to meet standards for the proper operation and use of equipment</li> </ul>	PIU/CIU, State Coordinator, Contractor	Yellow

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
			<ul style="list-style-type: none"> <li>Provide adequate sanitation facilities serving all workers at the site</li> <li>Ensure onsite worker sanitation facilities be properly operated and maintained to collect and dispose of wastewater</li> <li>Provide project workers with accessible means to raise workplace concerns (refer to Project LMP Workers GRM)</li> </ul> <p>The PIU and CIU will undertake routine site inspections to ensure that the onsite OHS risks are managed in line with the CESMP</p>		
	Workers cause social disruption leading to community grievances		<p>Non local workers to treat locally community with respect and follow the COC as outlined in the CESMP</p> <p>Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site</p>	PIU/CIU, State Coordinator, Contractor	
	Failure to use local employment and businesses leads to grievances		<p>Where possible use locals and local businesses</p> <p>Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site</p>	PIU/CIU, State Coordinator, Contractor	
	Community grievances		<p>Contractor to include contact numbers for community grievances on worksite signs</p> <p>Refer any grievances received by the community or local businesses to the local PIU who will coordinate the GRM (detailed in the SEP)</p>	PIU/CIU, State Coordinator, Contractor	
<b>2.1.2 Development of a new marina and fisheries hub at Dekehtik, Pohnpei</b>					
2.1.2.2 Build of new marina at Dekehtik, Pohnpei, including: land preparation and fill, marina facilities (floating pontoons), landing area, and office building	Design not supported by budget		Prioritize design to only included works within budget prior to bidding and carry out a AESIA	PIU/CIU, DRD	
	Impacts to flora and fauna		<p>Site is a brownfield site that has been operating as a marina for 30 years (previously dredged with a dragline (Appendix 10 Site Assessment Dekehtik Marina and Appendix 11 Pre-feasibility Study)</p> <p>Pre-feasibility study recommends a benthic survey, this will only be required if significant dredging is necessary</p> <p>The contractor should avoid any disturbance to mangroves</p> <p>Remaining shallow areas from previously dredging should be left if possible to avoid further dredging with marina pontoons placed to avoid them where possible</p>	PIU/CIU, State Coordinator, Contractor	
	Erosion and sediment runoff		<p>Minimize landside earthworks where possible, undertake necessary sediment control measures to avoid sediment runoff into the water course at the back of the site</p> <p>Store soil, gravel, and sand in secure location</p>	PIU/CIU, State Coordinator, Contractor	
	Waste disposal		<p>Ensure building material is recycled where possible, any remaining waste to be disposed of at permitted landfill</p> <p>Waste management control measures to be detailed in CESMP</p>	PIU/CIU, State Coordinator, Contractor	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
	Pollution		Ensure proper handling, storage and disposal of waste oil, lubricants, oil filters and fuel from vehicles Control measures to be detailed in CESMP by the contractor	PIU/CIU, State Coordinator, Contractor	
	Construction gravel and sand		All material to be sourced from legal and registered quarry suppliers	PIU/CIU, State Coordinator, Contractor	
	Approvals not in place		Early engagement with the EPA to facilitate Environmental Permit	PIU/CIU, EPA	
	Local traffic and construction traffic		Access is via a main road and traffic hazards should be managed to avoid any conflict Minimize construction schedule by having all material and equipment available prior to commencement of works Detailed traffic management to be included in the CESMP by the contractor	PIU/CIU, State Coordinator, Contractor	
	Poor workplace OHS leading to injury or death of contractor employees		OHS risks require ongoing management to ensure contractor employee safety. The contractor will prepare a CESMP outlining strategies to manage OHS issues and will implement the minimum standards outlined in the CESMP. Contractor to conform to all OHS FSM laws and regulations Workers should be provided with adequate and appropriate PPE (safety helmets, shoes, gloves, mask,) and enforce on use of the PPE's Contractor to report immediately to the PIU any OHS incidents The contractor(s) undertaking works shall comply with all national and good practice regulations and GIIP regarding workers' safety, such as OHS section of the <a href="#">IFC EHS Guidelines on Construction and Decommissioning</a> , and implement the following at a minimum: <ul style="list-style-type: none"> <li>Develop and follow a site-specific OHS management strategies that deal with at a minimum those issues detailed in the CESMP Table 5.2</li> <li>Appoint a health and safety officer at site, who will have the authority to issue directives for the purpose of maintaining the health and safety of all personnel authorized to enter and or work on the site</li> <li>Prepare and implement a simple action plan to cope with risk and emergency (e.g., fire, storm surge, cyclone, COVID-19 outbreak)</li> <li>Training on occupational safety regulations and use of PPE during work site induction</li> <li>Undertake training of staff to meet standards for the proper operation and use of equipment</li> <li>Provide adequate sanitation facilities serving all workers at the site</li> <li>Ensure onsite worker sanitation facilities be properly operated and maintained to collect and dispose of wastewater</li> </ul>	PIU/CIU, State Coordinator, Contractor	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
			<ul style="list-style-type: none"> <li>Provide project workers with accessible means to raise workplace concerns (refer to Project LMP Workers GRM)</li> </ul> <p>The PIU and CIU will undertake routine site inspections to ensure that the onsite OHS risks are managed in line with the CESMP</p>		
	Workers cause social disruption leading to community grievances		<p>Non local workers to treat locally community with respect and follow the COC as outlined in the CESMP</p> <p>Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site</p>	PIU/CIU, State Coordinator, Contractor	
	Failure to use local employment and businesses leads to grievances		<p>Where possible use locals and local businesses</p> <p>Signs depicting work schedule and contacts for GRM (see the SEP) to be installed on site</p>	PIU/CIU, State Coordinator, Contractor	
	Impact on local vendors livelihood		<p>PIU/CIU and local authorities to engage early any vendors situated along the road near the site entrance</p> <p>Establish agreement with all vendors on proposed mitigation strategies of either:</p> <ul style="list-style-type: none"> <li>Remaining in current location with traffic management that maintains a safe distance from vendors and their clients</li> <li>Move to a nearby location further away from construction traffic with no detrimental effects on their livelihoods</li> <li>If temporary relocation during works is required develop, in consultation with the vendors, mitigation strategies based on the guiding principles in Appendix 4</li> </ul>	PIU/CIU	
	Community grievances		<p>Contractor to include contact numbers for community grievances on worksite signs</p> <p>Refer any grievances received by the community or local businesses to the local PIU who will coordinate the GRM (detailed in the SEP)</p>	PIU/CIU, PIU/CIU, Contractor	
	Disruption of recreational and livelihood activities during construction		<p>Early engagement with stakeholders to identify possible disruption</p> <p>Develop a livelihood management strategy for any vendors that may be impacted utilizing the guiding principles in Appendix 4</p> <p>Provide early disclosure of commencement of activities to users to facilitate relocation</p>	PIU/CIU, DRD, Contractor	
<b>2.1.5 Improve enforcement of fisheries regulations and environmental laws through institutional capacity enhancement</b>					
2.1.5.5 Planning and building of new guard houses at MPA sites in Pohnpei	<b>NO DESIGN PARAMETERS</b>		Develop designs and identify locations and undertake site assessments	PIU/CIU, EPA	
<b>3.2.4 Improve land and marine based collection and disposal of waste</b>					
3.2.4.3 Increase diversity of equipment to deal with marine oil	Equipment not fit for purpose		Undertake sufficient research utilizing suitable technical specialists to identify appropriate sustainable technology	PIU/CIU, EPA, DRD	

ACTIVITY	POTENTIAL IMPACTS/RISKS	RISK RATING	MITIGATION	RESPONSIBILITY	RESID. RISK
and waste at landing sites in Pohnpei			End users to develop operating and maintenance protocols		

## 9 IN Activities Requiring Further E&S Assessment and CESMP

As indicated in the previous section there are a number of listed activities that have limited design parameters or are of a nature that require additional E&S impact and risks assessment. **Table 9.1** list these and the recommended actions to be taken for further assessment as well as all those activities that will require a CESMP. Much of the information required for an Environmental and Social Impact Assessment (ESIA) is contained within this document and any additional assessment should be limited in its scope to just addressing issues not identified or adequately addressed in this document and be seen as an addendum to this document. As such it is recommended that any further studies be undertaken as an Abbreviated ESIA (AESIA) and a template and guidance for this is provided as Appendix 3.

### 9.1 CESMP

All activities requiring contractors to undertake civil works will require a CESMP. A template for the CESMP is detailed in Appendix 2. All the mitigation strategies detailed in this document that require action by the contractor undertaking the civil works will be transferred to CESMP. Additional mitigation strategies identified during contractors site assessment (e.g. actions to manage erosion etc.) through further assessment (if required). Additional measures or details of measures (such as erosion control) need to be added by the contractor. The PIU and CIU will assist the contractor to develop the CESMP. The CESMP must be approved by the PIU prior to the commencement of any works and the PIU/CIU and State Coordinators are required to audit the contractors activities to ensure contractor is compliant with the provisions of the CESMP.

**Table 9.1** IN activities requiring further E&S assessment and CESMPs

ID	ACTIVITY	ADDITIONAL ASSESSMENT (YES/NO)	CESMP (YES/NO) OTHER
<b>NATIONAL LEVEL &amp; COMPONENTS CONSISTENT ACROSS ALL STATES</b>			
<b>1.1.1 Institutional strengthening, including capacity and competency development of Competent Authority staff</b>			
1.1.1.3	Purchase of vehicles and boats for use by Competent Authority (CA) in Pohnpei, Yap and Kosrae States	NO	NO CIU boat operating procedures to be adopted by all CA offices using boats
<b>1.3.1 Development and application of an effective information management system (IMS) to inform decision-making for oceanic fisheries</b>			
1.3.1.2	Purchase and installation of data center equipment for IMS (e.g. data servers and cooling system)	NO	NO
1.3.1.3	Software registrations for and operationalization of IMS modules	NO	NO
<b>1.3.2 Implementation of the Electronic Monitoring program</b>			
1.3.2.1	Procurement of software and/or subscriptions (Satlink) for the EM program	NO	NO

ID	ACTIVITY	ADDITIONAL ASSESSMENT (YES/NO)	CESMP (YES/NO) OTHER
1.3.2.2	Procurement of hardware (e.g. cameras, antenna, cables, computer, battery back-up) for the EM program	NO	NO
1.3.2.3	Procurement of desktop computer for the EM program Data Review Center	NO	NO
<b>1.3.3 Institutional strengthening of NORMA through improved facilities to enable expansion and remit to be carried out more effectively</b>			
1.3.3.3	Creation of new satellite offices for NORMA in the States	YES Basic site assessments to be undertaken	YES
<b>2.1.5 Improve enforcement of fisheries regulations and environmental laws through institutional capacity enhancement</b>			
2.1.5.1	Procure supplies and equipment to facilitate enforcement in Chuuk	NO	NO PIU/CIU to identify appropriate protocols for enforcement prior to supply of equipment
2.1.5.2	Procure supplies and equipment to facilitate enforcement in Kosrae		
2.1.5.3	Procure supplies and equipment to facilitate enforcement in Pohnpei		
2.1.5.4	Procure supplies and equipment to facilitate enforcement in Yap		
<b>2.2.2 Improve safety and reduce losses at sea: safety equipment for small powered fishing vessels, in exchange for vessel registration and/or data</b>			
2.2.2.1	Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Chuuk	NO	NO PIU/CIU to identify appropriate protocols for training of coastal fishers in the use and maintenance of equipment
2.2.2.2	Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Kosrae		
2.2.2.3	Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Pohnpei		
2.2.2.4	Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Yap		
<b>2.3.2 Equipment for collection and storage of fisheries and environmental data</b>			
2.3.2.1	Procurement and installation of hardware for data collection and storage in Chuuk	NO	NO
2.3.2.2	Procurement and installation of hardware for data collection and storage in Kosrae		
2.3.2.3	Procurement and installation of hardware for data collection and storage in Pohnpei		
<b>KOSRAE</b>			
<b>1.1.2 Competent Authority system strengthening and implementation</b>			
1.1.2.1	Improvement of the Kosrae fish landing site - concreting dock	NO	YES
1.1.3.2	Water quality improvement at landing sites Kosrae	NO	YES
<b>2.1.4 Upgrades and improvements to marinas in Kosrae</b>			
2.1.4.1	Consultancy to assess the feasibility of fish processing units and infrastructural needs (including boat ramps) at Lelu, Okat, and Utwe marinas, Kosrae	NO	YES
2.1.4.2	Installation of boat ramp and floating pontoons/jetties at Okat marina, Kosrae	NO	YES



ID	ACTIVITY	ADDITIONAL ASSESSMENT (YES/NO)	CESMP (YES/NO) OTHER
2.1.4.3	Installation/improvement of boat ramp and floating pontoons/jetties at Lelu marina, Kosrae	NO	YES
2.1.4.4	Installation of boat ramp and floating pontoons/jetties at Utwe marina, Kosrae	NO	YES
<b>2.3.4 Renovations of the DREA fisheries office in Kosrae</b>			
2.3.4.1	Contractor to carry out renovations of the current fisheries office	NO	YES
2.3.4.2	Re-furnishing of the renovated fisheries office including storage for radio communications equipment and servers	NO	NO
<b>3.1.2 Improve protection and conservation of the coastal ecosystem</b>			
3.1.2.3	Assess condition of the environmental mooring buoy system in Kosrae state, replace missing and upgrade damaged parts	NO	YES
<b>3.2.4 Improve land and marine based collection and disposal of waste</b>			
3.2.4.2	Procure equipment and advanced technologies for collection and disposal of marine waste in Kosrae	NO	NO End users to develop operating and maintenance protocols
<b>YAP</b>			
<b>2.5.1 Development of fish aggregation device (FAD) management plans</b>			
2.5.2.3	FAD deployment in Yap state with assistance and training from experts	YES Further assessment of OHS risks and mitigation strategies for deployment to be included in the CESMP	YES
<b>3.1.2 Improve protection and conservation of the coastal ecosystem</b>			
3.1.2.2	Pilot restoration of existing dredging sites in Yap state	YES Activity requires reassessment for viability given the budget	NO
3.2.4.4	Improve collection and proper disposal of all waste streams (including e-wastes, hazardous waste) in Yap	YES Requires consultancy to identify actions	YES
3.2.4.5	Shipping chemicals that are currently stored in Yap		
3.2.4.6	Support public landfill site maintenance and operations in Yap		
<b>CHUUK</b>			
<b>2.1.1 Re-development of Chuuk marina (Weno) services and facilities</b>			

ID	ACTIVITY	ADDITIONAL ASSESSMENT (YES/NO)	CESMP (YES/NO) OTHER
2.1.1.2	Extension of dock at Weno marina, Chuuk to provide a suitable mooring area	YES For any major works for the marina as described in the Pre-feasibility study (breakwater extension, relocation of the tetrapod's and marina basin dredging) an LESIA would be required	YES
2.1.1.3	Re-development of landside facilities at Weno marina, Chuuk, including rehabilitation of existing market building and new public facilities unit	YES Site assessment for asbestos, any recommendations to be included in CESMP	YES
2.1.1.4	Build of new piers at Weno marina, Chuuk, to provide additional safe moorings	YES For any major works for the marina as described in the Pre-feasibility study (breakwater extension, relocation of the tetrapod's and marina basin dredging) an LESIA would be required	YES
<b>2.2.4 Enhance Chuuk state NavAids (beacon markers for channels).</b>			
2.2.4.1	Firm to assess NavAids needs, and procure and install NavAids in high traffic/danger areas in Chuuk state	YES Develop design parameters and site locations during needs assessment and identify any E&S impacts and risks during this assessment and include in CESMP	YES
2.3.2.5	Vehicle for Chuuk DMR to enable data collection from fish markets in Weno	NO	NO DMR to ensure vehicle is only operated by a licensed driver and in a safe manner
<b>3.2.1 Phase one (concurrent with phase two): Preparation of new landfill site at Nepukos village, Chuuk</b>			
3.2.1.1	Vegetation strip, taking down to composting site (initial preparation)	NO	YES
3.2.1.2	Build of new access road to Nepukos village site	NO	NO
3.2.1.3	Preparation of new landfill site for public use (e.g., bays, parking, etc.)	YES	YES
3.2.1.4	Liner and leachate installation at new landfill site	Revise and update EIAS	
<b>3.2.2 Phase two (concurrent with phase one): Sorting and clearance of interim marina waste site in Weno, Chuuk</b>			
3.2.2.1	Sorting and clearance of interim marina site, transport of pure landfill to new site	NO	YES
<b>3.2.3 Phase three: Build of new solid waste management facility at existing site (Neauo), Chuuk</b>			
3.2.3.1	Renewal/upgrade of road to old landfill site (Neuou)	NO	YES
3.2.3.2	Design of detailed plans for build of the new waste management facility	YES Revise and update EIAS to include waste management facility	
3.2.3.3	Land preparation and preparation of sub-structure and fencing		
3.2.3.4	Installation of basic utilities (electricity and water) at site		

ID	ACTIVITY	ADDITIONAL ASSESSMENT (YES/NO)	CESMP (YES/NO) OTHER
3.2.3.5	Build of steel framed, high-specification solid waste management building		
3.2.3.6	Climate-proofing of new building		
3.2.3.7	Purchase of the required machinery for the new building		
<b>3.2.4</b>	<b>Improve land and marine based collection and disposal of waste</b>		
3.2.4.1	Install community bins/collection points including for lagoon and outer islands in Chuuk	NO	NO
<b>POHNPEI</b>			
<b>1.2.1 Establishment of a Reference Laboratory.</b>			
1.2.1.4	Design and construction of a new multi-purpose Reference Laboratory building	NO	YES
<b>1.3.3 Institutional strengthening of NORMA through improved facilities to enable expansion and remit to be carried out more effectively</b>			
1.3.3.2	Construction of the new NORMA office building	NO	YES
<b>2.1.2 Development of a new marina and fisheries hub at Dekehtik, Pohnpei</b>			
2.1.2.1	Design consultancy to develop detailed plans for the new marina and offices/training center at Dekehtik, Pohnpei	YES Assess possible impacts to livelihood and develop a livelihoods management strategy if required	YES
2.1.5.5	Planning and building of new guard houses at MPA sites in Pohnpei	YES Site assessments when design and sites available	YES
1.3.3.2	Build of new marina at Dekehtik, Pohnpei, including: land preparation and fill, marina facilities (floating pontoons), landing area, and office building	YES Undertake a LESIA when final design and works are approved (see Pre-feasibility Study Appendix 11)	YES

## 10 Requirement for Civil Works Bidding Documents and E&S Mitigating Cost Estimates

The following **Table 10.1** should be included in the bidding documents along with the CESMP template (Appendix 2) for any IN activities that require civil works. To implement the management of the E&S mitigation strategies the contractor will be required, with the support of the PIU/CIU to develop a CESMP (Appendix 2). Development of the CESMP will be undertaken at the contractor's expense and must be included in all bids for the bids to be valid.

**Table 10.1** E&S requirements and estimated costs for bidding documents

POTENTIAL IMPACTS	POTENTIAL RISKS	MITIGATION	CONTRACTORS REQUIREMENTS	ESTIMATED COST
Construction	Construction	Develop and implement the CESMP	Develop in collaboration with the PIU/CIU a CESMP implement and train staff on CESMP including OHS	USD5,000

POTENTIAL IMPACTS	POTENTIAL RISKS	MITIGATION	CONTRACTORS REQUIREMENTS	ESTIMATED COST
Degradation of flora and fauna	Loss of critical flora and fauna	The contractor should ensure that there is minimal disturbance to the site area	The contractor to have a basic understanding of the site parameters and requirements for any earth works or other site disturbances during works	Contractor to include costs, if any, when bidding
Water quality	Erosion and sediment runoff	The contractor will ensure proper demarcation of the area to be affected by the works. Works to limit vegetation removal at site; Any excavation activities should not interfere with local drainage or introduce physical changes that are not in harmony with the physical setting of the area. Retention of grass, herbaceous plants, shrubs and trees, to the extent possible on the site	The contractor to have a basic understanding of the site parameters and requirements for any earth works or other site disturbances during works	Contractor to include costs, if any, when bidding
	Pollution	Ensure proper handling, storage and disposal of waste oil, lubricants, oil filters and fuel from vehicles	Best practice to be undertaken by the contractor and detailed in CESMP	Contractor to include costs, if any, when bidding
Noise and vibration	Community grievances	Undertake works at suitably agreed times that do not impact the community adversely Observe a common-sense approach to vehicle use, and encourage drivers to switch off vehicle engines when not in use Provision of appropriate PPE (hearing protection ear muffs) to the workers and any other person visiting the site	Standard best practice to be undertaken by the contractor and detailed in CESMP	Contractor to include costs, if any, when bidding
Solid waste	Community grievances	Ensure all solid waste is deposited to approved landfill sites or in a manner that is acceptable to the community	Best practice to be undertaken by the contractor and detailed in CESMP	Contractor to include costs, if any, when bidding
Local employment	Community grievances	Where possible use locals and local businesses	Contractors to priorities local employment and businesses	No cost
Occupational health and safety	Injury or death	Contractor to conform to all OHS laws and regulations All construction workers should be inducted on the health and safety requirements while at the work site Workers should be provided with adequate and appropriate PPE (safety helmets, shoes, gloves, mask,) and enforce on use of the PPE	Best practice to be undertaken by the contractor and detailed in CESMP	Contractor to include costs, if any, when bidding

POTENTIAL IMPACTS	POTENTIAL RISKS	MITIGATION	CONTRACTORS REQUIREMENTS	ESTIMATED COST
		Provision of clean and accessible sanitary facilities and water to workers Install safety signs at the work site Contractor to report immediately to the PIU any OHS incidents		
Social disruption	Community grievances	Non local workers to treat local community with respect and follow the code of conduct (COC) as outlined in the CESMP Induction on CESMP and COC undertaken prior to any work on site	Detailed in CESMP	No cost
COVID - 19	Community infections	All the current at time of construction COVID-19 prevention measures should be observed and may include the following: <ul style="list-style-type: none"> <li>Wearing prescribed and appropriate PPE (masks) on site at all times.</li> <li>Regularly washing hands, sanitizing and observing social distancing at all times</li> <li>Seeking healthcare services immediately one experiences any of the following symptoms (while at home or work): cough, fever and shortness of breath.</li> </ul>	Contractor to comply with COVID 19 mandates at time of construction	Contractor to include costs, if any, when bidding

## 11 Monitoring, Evaluation and Reporting

Monitoring and evaluation is essential to ensure successful implementation of the ESMP. The PIU, with support from the CIU Safeguards Team, will be responsible for establishing a monitoring schedule that will monitor, measure and assess the implementation and overall success of each of the mitigation strategies for each of the Activities.

The primary management tool for managing the civil works activities will be the CESMP, and regular on-site auditing of contractors by either the PIU, CIU Safeguards Team and/or the State Coordinators will be required.

Internal monitoring and reporting of E&S throughout the Project Cycle will be required in the Program's 6 monthly reporting.

## 12 Conclusion

The majority of the activities are small in scale and are proposed on brownfield sites. This ESMP, some additional assessment for yet to be fully designed and defined activities, and the development of CESMPs will provide sufficient information and direction for the management and mitigation of likely impacts and risks.

DRAFT

**NOTE: This document is based upon the original Concept project design for FSM PROPER. Therefore, this document does not reflect the full set of Project activities, and includes discussion of activities that are no longer included in the Project, or activities that have been amended. For the current set of Project activities, please refer to the PAD.**

## Appendix 1 Proposed List of Project Activities

TA – Technical Assistance IN – Infrastructure Works/Equipment

ID	Activity	Type
<b>1</b>	<b>Strengthening the institutional capacity, governance, and sustainable management of oceanic fisheries in the FSM</b>	
<b>1.1</b>	<b>Establishment of a Competent Authority</b>	
<b>1.1.1</b>	<b><i>Institutional strengthening, including capacity and competency development of Competent Authority staff</i></b>	
1.1.1.1	Staff development: GHP, GMP, HACCP, vessel and facility inspection trainings and audits	TA
1.1.1.2	Hiring of additional Competent Authority staff	TA
1.1.1.3	Purchase of vehicles and boats for use by Competent Authority in Pohnpei, Yap and Kosrae States	IN
<b>1.1.2</b>	<b><i>Competent Authority system strengthening and implementation</i></b>	
1.1.2.1	Implementation of the Competent Authority regulation, national control plan (NCP), & industry standards	TA
1.1.2.2	Consolidation of European Union (EU) process ready for Competent Authority	TA
<b>1.1.3</b>	<b><i>Improvement of Kosrae landing site, including installation of water purification system(s)</i></b>	
1.1.3.1	Improvement of the Kosrae fish landing site – concreting dock	IN
1.1.3.2	Water quality improvement at landing sites Kosrae	IN
<b>1.2</b>	<b>Establishment of a Reference Laboratory</b>	
<b>1.2.1</b>	<b><i>Establishment of a Reference Laboratory</i></b>	
1.2.1.1	Feasibility study of establishing a Reference Laboratory	TA
1.2.1.2	Establishment of sampling and analysis procedures; lab capacity and procedure development including training of food analysts	TA
1.2.1.3	Design and construction of a new multi-purpose Reference Laboratory building	IN
<b>1.3</b>	<b>Oceanic Fisheries Management: Data</b>	
<b>1.3.1</b>	<b><i>Development and application of an effective information management system (IMS) to inform decision-making for oceanic fisheries</i></b>	
1.3.1.1	Continued development of an IMS that collects and houses fisheries and related data from industry and various databases	TA
1.3.1.2	Purchase and installation of data center equipment for IMS (e.g. data servers and cooling system)	IN
1.3.1.3	Software registrations for and operationalization of IMS modules	TA
<b>1.3.2</b>	<b><i>Implementation of the Electronic Monitoring program</i></b>	
1.3.2.1	Procurement of software and/or subscriptions (Satlink) for the EM program	TA
1.3.2.2	Procurement of hardware (e.g. cameras, antenna, cables, computer, battery back-up) for the EM program	IN
1.3.2.3	Procurement of desktop computer for the EM program Data Review Center	IN
1.3.2.4	Review of EM Data Reviews and program cost recovery	TA
<b>1.3.3</b>	<b><i>Institutional strengthening of NORMA through improved facilities to enable expansion and remit to be carried out more effectively</i></b>	
1.3.3.1	Design consultancy for NORMA office building that includes a wet space (to be located on land at Pohnpei port)	TA
1.3.3.2	Construction of the new NORMA office building	IN
1.3.3.3	Creation of new satellite offices for NORMA in the States	IN
<b>1.4</b>	<b>Maximize the value of oceanic resources to the FSM through the Implementation of the Fisheries Investment Policy and additional reviews</b>	
<b>1.4.1</b>	<b><i>Institutional strengthening of NORMA through improved facilities to enable expansion and remit to be carried out more effectively</i></b>	
1.4.1.1	Creation of an Implementation Plan for the FSM National Oceanic Fisheries Investment Policy	TA
1.4.1.2	Review of how to enhance oceanic fisheries value through management using measures such as MCS, as well as how to leverage VDS days and value-adding	TA
1.4.1.3	Review of the legal framework for authorization of fishing vessels requesting to enter FSM ports	TA

ID	Activity	Type
1.4.1.4	Development of service provision at Weno Port: Feasibility study to assess potential for increased service provision at Weno Port	TA
<b>2</b>	<b>Strengthening the sustainable management of and socio-economic benefits from coastal fisheries in the FSM</b>	
<b>2.1</b>	<b>Marina Developments</b>	
<b>2.1.1</b>	<b>Re-development of Chuuk marina (Weno) services and facilities</b>	
2.1.1.1	Design consultancy to assess infrastructure needs at current Weno marina, Chuuk site and provide development plans	TA
2.1.1.2	Extension of dock at Weno marina, Chuuk to provide a suitable mooring area	IN
2.1.1.3	Re-development of landside facilities at Weno marina, Chuuk, including rehabilitation of existing market building and new public facilities unit	IN
2.1.1.4	Build of new piers at Weno marina, Chuuk, to provide additional safe moorings	IN
<b>2.1.2</b>	<b>Development of a new marina and fisheries hub at Dekehtik Pohnpei</b>	
2.1.2.1	Design consultancy to develop detailed plans for the new marina and offices/training center at Dekehtik, Pohnpei	TA
2.1.2.2	Build of new marina at Dekehtik, Pohnpei, including: land preparation and fill, marina facilities (floating pontoons), landing area, and office building	IN
<b>2.1.3</b>	<b>Bottom-up fisheries development and local capacity building</b>	
2.1.3.1	Assessment of marinas in Pohnpei – infrastructural needs and environmental impact, with the involvement of local associations	TA
2.1.3.2	Re-initiation of Pohnpei Menin Katengensed (Pohnpei Marine Council)	TA
2.1.3.3	Training of fishers on Quality Control and the cold chain carried out by a local NGO in all states	TA
<b>2.1.4</b>	<b>Upgrades and improvements to marinas in Kosrae</b>	
2.1.4.1	Consultancy to assess the feasibility of fish processing units and infrastructural needs (including boat ramps) at Lelu, Okat, and Utwe marinas, Kosrae	TA
2.1.4.2	Installation of boat ramp and floating pontoons/jetties at Okat marina, Kosrae	IN
2.1.4.3	Installation/improvement of boat ramp and floating pontoons/jetties at Lelu marina, Kosrae	IN
2.1.4.4	Installation of boat ramp and floating pontoons/jetties at Utwe marina, Kosrae	IN
<b>2.1.5</b>	<b>Improve enforcement of fisheries regulations and environmental laws through institutional capacity enhancement</b>	
2.1.5.1	Procure supplies and equipment to facilitate enforcement, and implement activities highlighted in management plans, in Chuuk	IN
2.1.5.2	Procure supplies and equipment to facilitate enforcement in Kosrae	IN
2.1.5.3	Procure supplies and equipment to facilitate enforcement in Pohnpei	IN
2.1.5.4	Procure supplies and equipment to facilitate enforcement in Yap	IN
2.1.5.5	Planning and building of new guard houses at MPA sites in Pohnpei	IN
<b>2.2</b>	<b>Safety at Sea</b>	
<b>2.2.1</b>	<b>Improve safety and reduce losses at sea: training and awareness</b>	
2.2.1.1	Sea safety training and awareness program in Chuuk for licensed fishing boat crews in communities	TA
2.2.1.2	Sea safety training and awareness program in Kosrae for licensed fishing boat crews in communities	TA
2.2.1.3	Sea safety training and awareness program in Pohnpei for licensed fishing boat crews in communities	TA
2.2.1.4	Sea safety training and awareness program in Yap for licensed fishing boat crews in communities	TA
<b>2.2.2</b>	<b>Improve safety and reduce losses at sea: safety equipment for small powered fishing vessels, in exchange for vessel registration and/or data</b>	
2.2.2.1	Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Chuuk	IN
2.2.2.2	Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Kosrae	IN
2.2.2.3	Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Pohnpei	IN
2.2.2.4	Safety packs (e.g., life jackets, EPIRBs, VHF radios, flashlights) for coastal fishers in Yap	IN
<b>2.2.4</b>	<b>Enhance Chuuk state NavAids (beacon markers for channels)</b>	
2.2.4.1	Firm to assess NavAids needs, and procure and install NavAids in high traffic/danger areas in Chuuk state	TA
<b>2.3</b>	<b>Coastal Fisheries Management: Data</b>	
<b>2.3.1</b>	<b>Assessment of existing data and development of new/revised protocols for fisheries and ecological data collection and storage</b>	
2.3.1.1	Assessment of availability of fisheries data/research and identification of priority sites for marine ecological assessments in all states	TA
2.3.1.2	Development of appropriate data collection protocols (market and landing sites) for fisheries in FSM for use in all states	TA



ID	Activity	Type
2.3.1.3	Validation of new data collection protocols through a series of stakeholder workshops in all states	TA
<b>2.3.2</b>	<b><i>Equipment for collection and storage of fisheries and environmental data</i></b>	
2.3.2.1	Procurement and installation of hardware for data collection and storage in Chuuk	IN
2.3.2.2	Procurement and installation of hardware for data collection and storage in Kosrae	IN
2.3.2.3	Procurement and installation of hardware for data collection and storage in Pohnpei	IN
2.3.2.4	Procurement and installation of hardware for data collection and storage in Yap	IN
2.3.2.5	Vehicle for Chuuk DMR to enable data collection from fish markets in Weno	IN
<b>2.3.3</b>	<b><i>Training for agencies and communities in new data collection (protocols, hardware and software)</i></b>	
2.3.3.1	Training of staff of fisheries departments and divisions, communities, community-based organizations and non-governmental organizations in the use of the new protocols	TA
2.3.3.2	Training of staff of fisheries departments and divisions, EPAs, and NGOs, in the use of new hardware and software for data management	TA
<b>2.3.4</b>	<b><i>Renovations of the DREA fisheries office in Kosrae</i></b>	
2.3.4.1	Contractor to carry out renovations of the current fisheries office	IN
2.3.4.2	Re-furnishing of the renovated fisheries office including storage for radio communications equipment and servers	IN
<b>2.4</b>	<b><i>Coastal Fisheries Management: Legislation and Policy</i></b>	
<b>2.4.1</b>	<b><i>Consultations to produce revised and updated fisheries, aquaculture, and environmental legislation, including deputization of Community Conservation Officers (CCOs)</i></b>	
2.4.1.1	Consultations in Chuuk state to produce revised and updated policies and development plans (e.g., Chuuk State Constitution Title 25)	TA
2.4.1.2	Consultations in Kosrae state to produce revised and updated policies and development plans (e.g., Kosrae State Code Title 19)	TA
2.4.1.3	Consultations in Pohnpei state to produce revised and updated policies and development plans (e.g., Pohnpei State Code Titles 26, 28, and 29)	TA
2.4.1.4	Consultations in Yap state to produce revised and updated policies and development plans (e.g., Yap State Constitution Titles 18, 26, and 29, and MPA-specific legislation)	TA
2.4.1.5	Consultancy to assist with the finalization of the boat registration bills in all states and development of the marina MOUs (e.g., safety equipment in return for vessel registration and/or data provision)	TA
2.4.1.6	Nationally-led validation workshop to discuss proposed legislative, regulatory and policy updates with stakeholders	TA
2.4.1.7	Consultancy to review results of ecological assessments and provide regulatory recommendations to governments	TA
<b>2.4.2</b>	<b><i>Dissemination of new inshore fisheries laws, regulations, policies and development plans</i></b>	
2.4.2.1	Community and government/organization workshops in Chuuk state	TA
2.4.2.2	Community and government/organization workshops in Kosrae state	TA
2.4.2.3	Community and government/organization workshops in Pohnpei state	TA
2.4.2.4	Community and government/organization workshops in Yap state	TA
<b>2.4.3</b>	<b><i>Facilitate enforcement and enhance safety through mandatory vessel registration and training</i></b>	
2.4.3.1	Materials (e.g., high-visibility paint and stickers) to registered boats in Chuuk	IN
2.4.3.2	Materials (e.g., high-visibility paint and stickers) to registered boats in Kosrae	IN
2.4.3.3	Materials (e.g., high-visibility paint and stickers) to registered boats in Pohnpei	IN
2.4.3.4	Materials (e.g., high-visibility paint and stickers) to registered boats in Yap	IN
2.4.3.5	Enforcement/deputization training to government agencies, NGOs, and CCOs in all states, based on new legislation	IN
<b>2.5</b>	<b><i>Fish Aggregation Devices</i></b>	
<b>2.5.1</b>	<b><i>Development of fish aggregation device (FAD) management plans</i></b>	
2.5.1.1	Development of FAD management plans for all states including identification of appropriate locations for deployment	TA
<b>2.5.2</b>	<b><i>Support the installation of FADs for use by coastal communities to allow for more production from non-reef sources</i></b>	
2.5.2.1	Procurement of FADs with various technologies for Yap state large-scale FAD pilot project	IN
2.5.2.2	Training in FAD operation and monitoring technologies in all states	TA
2.5.2.3	FAD deployment in Yap state with assistance and training from experts	IN
2.5.2.4	FAD public awareness campaign across Yap state	TA
<b>2.6</b>	<b><i>Aquaculture Developments</i></b>	
<b>2.6.4</b>	<b><i>Feasibility assessments for community-focused aquaculture development</i></b>	

ID	Activity	Type
2.6.4.1	Feasibility assessment for development of infrastructure needs (landside and farms) for community-led commercial sea cucumber aquaculture in Pohnpei	TA
2.6.4.2	Feasibility assessment for a collaboratively-led commercial aquaculture production and community training center in Kosrae state	TA
<b>3</b>	<b>Strengthening the sustainable management, protection, and resilience of marine habitats in the FSM</b>	
<b>3.1</b>	<b>Environmental Protection</b>	
<b>3.1.1</b>	<b>Community capacity building in waste management and coastal pollution</b>	
3.1.1.1	Awareness campaigns in lagoon and outer island communities including schools in Chuuk state to inform about the new waste management system	TA
3.1.1.2	Capacity building program for Chuuk Women's Council to enable expanded outreach efforts	TA
3.1.1.3	Awareness campaigns in Yap state to minimize waste generation and increase proper disposal	TA
<b>3.1.2</b>	<b>Improve protection and conservation of the coastal ecosystem</b>	
3.1.2.1	Pilot restoration of existing dredging sites in Chuuk state	TA
3.1.2.2	Pilot restoration of existing dredging sites in Yap state	TA
3.1.2.3	Assess condition of the environmental mooring buoy system in Kosrae state, replace missing and upgrade damaged parts	TA
<b>3.2</b>	<b>Waste Infrastructure</b>	
<b>3.2.1</b>	<b>Phase one (concurrent with phase two): Preparation of new landfill site at Nepukos village, Chuuk</b>	
3.2.1.1	Vegetation strip, taking down to composting site (initial preparation)	IN
3.2.1.2	Build of new access road to Nepukos village site	IN
3.2.1.3	Preparation of new landfill site for public use (e.g., bays, parking, etc.)	IN
3.2.1.4	Liner and leachate installation at new landfill site	IN
<b>3.2.2</b>	<b>Phase two (concurrent with phase one): Sorting and clearance of interim marina waste site in Weno, Chuuk</b>	
3.2.2.1	Sorting and clearance of interim marina site, transport of pure landfill to new site	IN
<b>3.2.3</b>	<b>Phase three: Build of new solid waste management facility at existing site (Neuou), Chuuk</b>	
3.2.3.1	Renewal/upgrade of road to old landfill site (Neuou)	IN
3.2.3.2	Design of detailed plans for build of the new waste management facility	TA
3.2.3.3	Land preparation and preparation of sub-structure and fencing	IN
3.2.3.4	Installation of basic utilities (electricity and water) at site	IN
3.2.3.5	Build of steel framed, high-specification solid waste management building	IN
3.2.3.6	Climate-proofing of new building	IN
3.2.3.7	Purchase of the required machinery for the new building	IN
3.2.3.8	Technician and operational training for use of the new machinery	TA
<b>3.2.4</b>	<b>Improve land and marine based collection and disposal of waste</b>	
3.2.4.1	Install community bins/collection points including for lagoon and outer islands in Chuuk	IN
3.2.4.2	Procure equipment and advanced technologies for collection and disposal of marine waste in Kosrae	IN
3.2.4.3	Increase diversity of equipment to deal with marine oil and waste at landing sites in Pohnpei	IN
3.2.4.4	Improve collection and proper disposal of all waste streams (including e-wastes, hazardous waste) in Yap	IN
3.2.4.5	Shipping chemicals that are currently stored in Yap	IN
3.2.4.6	Support public landfill site maintenance and operations in Yap	IN
<b>3.3</b>	<b>Marine Habitats Management: Data</b>	
<b>3.3.1</b>	<b>Prepare teams to conduct assessments for marine ecological health and monitoring</b>	
3.3.1.1	Dive certifications and equipment to facilitate new and ongoing ecological surveys in Chuuk	TA
3.3.1.2	Dive certifications and equipment to facilitate new and ongoing ecological surveys in Kosrae	TA
3.3.1.3	Dive certifications and equipment to facilitate new and ongoing ecological surveys in Pohnpei	TA
3.3.1.4	Dive certifications and equipment to facilitate new and ongoing ecological surveys in Yap	TA
3.3.1.5	Procure equipment for monitoring of dredging in Chuuk	IN
<b>3.4</b>	<b>Marine Habitats Management: Legislation and Policy</b>	
<b>3.4.1</b>	<b>Improve emergency response protocols, pollution laws, and waste management strategies in all states</b>	
<b>4</b>	<b>Project management</b>	
<b>4.1</b>	<b>Personnel for Project Implementation Unit (PIU)</b>	
<b>4.1.1</b>	<b>PIU staff salaries</b>	
4.1.1.1	Project Manager (5 years full-time)	TA
4.1.1.2	Project Officer	TA
4.1.1.3	Project Assistant	TA
4.1.1.4	Marine Coastal Engineer	TA

ID	Activity	Type
4.1.1.5	Technical Expert: Waste	TA
4.1.1.6	Staff equipment / Furniture	TA
4.1.1.7	Chuuk State Coordinator	TA
4.1.1.8	Pohnpei State Coordinator	TA
4.1.1.9	Yap State Coordinator	TA
4.1.1.10	Kosrae State Coordinator	TA
4.1.1.11	Communications Officer	TA
4.1.1.12	M&E Officer	TA
4.1.1.13	National Consultation Meetings and facilitation	TA
4.1.1.14	Miscellaneous office costs	TA
4.1.1.15	CIU costs	TA
<b>5.1.1</b>	<b><i>Project development consultancies</i></b>	
5.1.1.1	Design Preparation Consultant – Design preparation work in collaboration with DOFA, DRD, NORMA, DECEM and other stakeholders	TA
5.1.1.2	Environment and Social Safeguards Consultant – development of an environmental and social management plan; training staff and stakeholders	TA
5.1.1.3	POM Consultant – development of the Project Operations Manual (POM) and training the PIU staff on the POM	TA
5.1.1.4	Gender Specialist Consultant – gender analysis of the fisheries sector and recommendations based on local context and what works on ground	TA
5.1.1.5	Legal Consultant – conduct legal assessment on UNCLOS Article 73 compliance COMPLETED	TA

## Appendix 2 Contractors Environmental and Social Management Plan Template

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FSM National Oceanic  
Resource Management  
Authority

**Federated States of Micronesia  
Pacific Islands Regional Oceanscape Program Second Phase for Economic  
Recovery and Resilience (PROPER)  
(P178237)**

**Contractor Environmental & Social  
Management Plan**

**Draft 1  
Date**

DRAFT

DRAFT

## Document Control

Date	Version	Description	Name
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## Abbreviations

CESMP	Contractors Environmental and Social management Plan
COC	Code of Conduct
EHS	Environmental Health and Safety
E&S	Environmental and Social
ESF	Environmental and Social Framework (World Bank)
ESS	Environmental and Social Standard
ESH	Environmental, Social and Health
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
IA	Implementing Agency (SIG Ministry or Department)
OHS	Occupational Health and Safety
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
TOR	Terms of Reference
VAC	Violence Against Children
WB	World Bank

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## 14 Introduction

The Federated States of Micronesia (FSM) has received financing from the World Bank (WB) International Development Association (IDA) for the preparation of the second phase of the Pacific Islands Regional Oceanscape Program (PROP). PROP comprised a series of Programs, which included separate national Programs in the Federated States of Micronesia (FSM), the Republic of the Marshall Islands, Tuvalu and the Solomon Islands, and a separate but complementary regional Program implemented by FFA. Programs in Kiribati, Tonga and Samoa have also recently joined. The second phase is now called the FSM Pacific Regional Oceanscape Program – Economic Resilience (FSM PROPER). FSM PROPER is envisaged to maintain and expand on the gains achieved through the first phase, PROP.

The FSM PROPER development objective (PDO) is to strengthen regional collaboration and national capacity for the management and the sustainable development of the oceanic and coastal fisheries sector in FSM and the critical habitats on which they depend.

This document template is to be used by the contractors and the Project Implementation Unit (PIU) to mitigate any environmental and social (E&S) impacts and risks associated with minor civil works. Additional information will be required to be entered by the PIU and contractor when details of the activity have been finalized and all impacts and risks identified by the PIU and the contractor.

Generally, construction of small works poses limited environmental and social (E&S) impacts and risks therefore it is very important to take into consideration and implement the principles of best practice environmental and social risk management to facilitate outcomes that are harmonized with the WB Environmental and Social Framework (ESF) Environmental and Social Standards (ESSs) and to avoid any negative E&S impacts.

***Contractor to insert short introduction of activities.***

## 15 Purpose of the CESMP

The CESMP is developed purposely to manage and guide the contractor in their management of environmental and social risks and impacts and the construction of WB projects. The contractor is obliged by the provisions of the contract under the actions detailed in this CESMP which has been approved by the PIU. Should the contractor fail to comply with the provisions of this CESMP, the PIU shall withhold payment of invoices until the contractor resolves the issue(s).

### 15.1 Objectives

Key objectives of the CESMP are:

- To guide compliance with relevant FSM and **enter State** legislation and the CESMP conditions
- To describe the conditions and mitigation measures the contractor will undertake

to manage the E&S impacts and risks including health and safety of workers

- To clearly define key personnel roles and responsibilities for the management, implementation, monitoring and reporting of the provisions within the CESMP
- To detail the contractor’s responsibility for any training and internal communications which ensures their workers understand the risks and impacts associated with the project.

## 16 Contractor Obligations

The following practices and strategies will be implemented by the contractor for any construction or refurbishment activities.

**Contractor to implement the E&S mitigation strategies and insert any additional impacts and risks in Table 3.1**

**Table 1** Potential impacts and risk from ESMP (or any additional assessments) mitigation strategies and additional contractor requirements

Potential Impacts & Risks	Mitigation as outlined in the ESMP	Contractor requirements (contractor to add)
		•

### 16.1 Waste Management

The following will apply to all waste management activities:

- All wastes and construction generated debris will be removed from construction site, transported properly and disposed in approved landfill facilities
- Daily site clean-up procedures will be established and enforce by the contractor. This will also include maintenance of adequate waste storage, recycling and disposal facilities for litter, solid waste, soil and construction debris
- Waste are to be stored properly in a secure place before disposal
- Ensure to store Hazardous wastes such as used oils, batteries, etc. are stored safely and securely and remove from project site for safe recycling or disposal prior to end of construction period.
- All workers must wear appropriate Personal Protective Equipment (PPE) when handling waste.

#### Prohibitions

- Disposal of any waste into the ocean or beaches, drainage ditches, rivers, other watercourses, agricultural fields and public areas is strictly prohibited
- Disposal of contaminated or wash water, including concrete washings within 30

meters of any waterway or the coast or in a place where it may enter a waterway or the coast is strictly prohibited. Disposal of plastic and non-organic wastes by burning is prohibited

- In the event that accidental leakage or spillage of fuel or chemicals takes place, the spill should be immediately contained and cleaned up.

## **16.2 Community Engagement**

The PIU will develop some basic community information disclosure to inform the recipient community, groups and individuals of the project activities and responsibilities of the contractor. It is very important that the contractor is required to have the name and contact of a community leader/representative and work closely with the community leader/representative on activities regarding any noise, dust or inconvenience that may be caused to the local community during construction.

## **16.3 Chance finds**

A chance finds procedure is detailed in Appendix 1 will be followed if previously unknown cultural heritage is encountered during works.

## **16.4 Complaints and Grievances**

The contractor must pass on any complaints and grievances received on-site to the PIU. The PIU to brief the contractor on the process for handling complaints and grievances in accordance with the PIU Grievance Redress Mechanism (GRM – Appendix 2). Details of the GRM and a contact number are to be included in the community information disclosure and where possible on any workplace signage.

With regard to incidents of Gender Based Violence (GBV), Sexual Abuse and Exploitation (SEA), Sexual Harassment (SH) or Violence Against Children (VAC) a separate reporting mechanism is in place and is described in the GRM document Appendix 2.

## **16.5 Workplace Safety**

It is very important that workplace safety is considered in all WB projects. During construction, everyone is required to prioritize workplace safety to avoid accidents and injuries.

Everybody is responsible to;

- Be aware of safety risks at all times
- Report and communicate to supervisor(s) on workplace safety issues

Occupational Health and Safety (OHS) is an important mechanism in workplace safety. Table 2 describes on-site OHS ways to manage the risks of injury or death during construction activities. Below are OHS provisions which will be implemented.


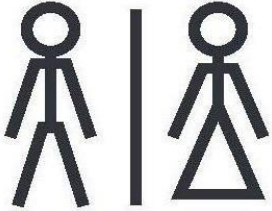

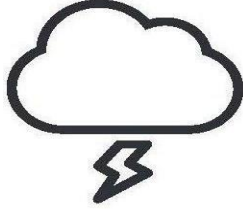



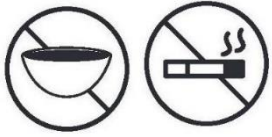
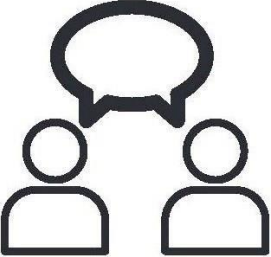
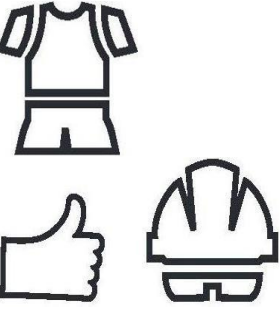
The contractor shall ensure that all on-site workers have access and wear PPE properly at all times. PPE includes, but not limited to; safety vests, hard hat, appropriate foot wear, gloves, goggles, long pants and harnesses for working at height.

## **16.6 COVID-19 Workplace Safety**

The contractor shall acquire any Covid-19 directives from their respective health authorities and abide by these directives.

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**Table 2 Minimum OHS provisions to be applied**

	<p>Sufficient and clean drinking water to be on site at all times for workers.</p>		<p>Toilets on or near the site to be available for all workers.</p>
	<p>Suitable protection from rain and sun during rest breaks or weather stoppages to be made available</p>		<p>Workers are not forced to work in extreme weather (heavy rain, strong winds, etc.) or other weather that is dangerous or impactful</p>
	<p>Site Supervisors should be trained in basic first aid to be able to provide care</p>		<p>The Site Supervisor should know where the nearest hospital/clinic is and where an ambulance or quick transport can be found/accessed.</p>
	<p>A first aid kit is to be kept up to date, and on site at all times in a visible, accessible location</p>		<p>No alcoholic drinks or drugs to be taken before starting or during work (including; betel nut, kava, beer and marijuana). Workers should be not be affected by drugs or alcohol while on site at any time</p>
	<p>Machinery operators must be properly trained to use the machine</p>		<p>Protective clothing to be worn at all times:</p> <ul style="list-style-type: none"> <li>• Safety boots</li> <li>• Reflectorized yellow or orange-coloured safety vests or harnesses</li> <li>• Hats where there is strong sun</li> <li>• Goggles/masks when working in dusty condition</li> <li>• Gloves when working in bush clearing and removal of obstructions, or mixing concrete/handling other toxic materials</li> <li>• Hard hats/helmets when working on sites where there is a danger of falling objects, e.g., in deep drains, digging pit latrines, work in quarries, etc.</li> </ul>

## 16.7 Worksite induction

A site induction prior to start of work is very important and it must be undertaken for all site workers to ensure employees are aware of;

- The importance and purpose of the CESMP
- OHS onsite
- Any significant environmental hazards, actual or potential, that may be caused as a result of their activities or the project
- Roles and responsibilities in relation to this CESMP
- Any spill response and or emergency procedure
- Accident and incident reporting and methods of prevention
- The Code of Conduct including responsibilities around GBV, SEA, SH VAC.

## 16.8 Roles and Responsibilities

The contractor has the responsibility to apply this CESMP during construction and to:

- Nominate an onsite supervisor:
  - To be the focal point for the PIU
  - To manage any public interaction
  - To be responsible for reporting any issues to the PIU
  - To ensure all individuals understand this CESMP and their obligations

The PIU will be responsible for ensuring that the contractor complies with this CESMP with regular site visits and discussions with the nominated onsite manager.

## 17 Contractor Acknowledgment of CESMP and Code of Conduct (COC)

The Contractor is committed to ensuring that the project is implemented in a way which minimizes any negative impacts on the local environment, communities, and its workers. This will be done by respecting the environmental and social issues detailed in this CESMP, reporting and if appropriate, responding to issues that are unforeseen and ensuring appropriate OHS standards on-site. The contractor is also committed to creating and maintaining an environment in which they will not tolerate any breaches of the provisions within the CESMP by any employee, sub-contractor, supplier, associate, or representative of the contractor.

To ensure that all those engaged in the project are aware of their obligations, the contractor commits to the following core principles and minimum standards of behavior that will apply to all contractor employees, associates, and representatives, including sub- contractors and suppliers, without exception:

- The contractor - and therefore all employees, associates, representatives, sub-contractors and suppliers - commits to complying with all relevant national laws, rules and regulations
- The contractor commits to fully implementing its CESMP



- The contractor commits to treating women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- The contractor shall ensure that interactions with local community members are done with respect and non-discrimination
- Demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behavior are prohibited among all contractor employees, associates, and its representatives, including sub-contractors and suppliers
- The contractor will follow all reasonable work instructions (including those pertaining to environmental and social safeguards)
- The contractor will protect and ensure proper use of property (for example, to prohibit theft, carelessness or waste)
- The contractor will ensure that the project's OHS standards are effectively implemented by contractor staff, as well as sub-contractors and suppliers.
- The contractor will ensure that all persons on-site wear prescribed and appropriate personal protective equipment, preventing avoidable accidents and reporting conditions or practices that pose a safety hazard or threaten the environment
- The contractor will:
  - a. Prohibit the use of alcohol during or before work activities
  - b. Prohibit the use of narcotics or other substances which can impair faculties at all times
- The contractor will ensure that adequate sanitation facilities are available on site and at any worker accommodation provided for those working on the project

To ensure that the above principles are implemented effectively the contractor commits to ensuring that:

- All personnel on site sign the Code of Conduct (6.1)) confirming their agreement to comply with the CESMP and OHS standards
- Copies of the Contractor and Codes of Conduct are translated into the appropriate language of use in the work site areas.
- All employees attend an induction prior to commencing work on site to ensure they are familiar with the contractor's commitments within the CESMP and the OHS standards.

***I do hereby acknowledge that I have read the abovementioned Code of Practice and Contractor Code of Conduct, and on behalf of the contractor agree to comply with the standards contained therein. I understand my role and responsibilities to support the CESMP and OHS standards. I understand that any action inconsistent with this CESMP or failure to act mandated by this CESMP may result in disciplinary action.***

**Contractor name:** *Insert contractor name*

**Signature:** \_\_\_\_\_

**Printed Name:** \_\_\_\_\_

**Title:** \_\_\_\_\_

**Date:** \_\_\_\_\_

### 17.1 Code of Conduct (COC)

The following Code of Conduct (COC) must be read and understood by all workers on site including any subcontractors (if required):

I, *individual's name*, acknowledge that adhering to the provisions as detailed in this COC and following any of the Project's Environmental, Social and Health (ESH) or Occupational Health and Safety (OHS) provisions is important.

The Client considers that failure to follow the COC, ESH or OHS standards, be it in an office, on a work site, office and work site surroundings, at workers' camps, in worker's homes, or the surrounding communities - constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment.

I agree that while working on the Project I will:

1. Attend and actively participate in any induction or training required for OHS, GBV/SEA/SH and VAC as requested by my employer.
2. Will wear my personal protective equipment (PPE) at all times when required.
3. Implement any OHS requirements
4. Comply with all laws of the FSM and *insert state*, regulations and other requirements, including protecting the health, safety and well-being of other Contractor's worker and any other persons.
5. Not drink alcohol or use narcotics or other substances which can impair faculties and potentially cause incidents, before or during work activities.
6. Consent to a Police background check if required.
7. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
8. Not use language or behavior towards women, children or men that is inappropriate,

harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

9. Not engage in sexual harassment—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior (e.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody's sex life; etc.).
10. Not engage in sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
11. Not participate in sexual contact or activity with children (persons under the age of 18) including grooming, or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
12. Unless there is the full consent<sup>2</sup> by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non- monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this COC.
13. Report to my manager any suspected or actual GBV/SEA/SH or VAC by a fellow worker, whether employed by my contractor or not, or any breaches of this COC.

With regard to children under the age of 18:

14. Wherever possible, ensure that another adult is present when in the proximity of children.
15. Not invite unaccompanied children unrelated to my family into my home, or the works site unless they are at immediate risk of injury or in physical danger.
16. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography.
17. Refrain from physical punishment or discipline of children.
18. Refrain from hiring children for domestic or other labor below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.
19. Comply with all relevant local legislation, including labor laws in relation to child labor

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<sup>2</sup> Consent is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

and World Bank's safeguard policies on child labor and minimum age.

### Sanctions

I understand that if I breach this COC, my employer will take disciplinary action which could include:

- a) Informal warning.
- b) Formal warning.
- c) Additional Training.
- d) Loss of up to one week's salary.
- e) Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
- f) Termination of employment.
- g) Report to the Police if warranted.

***I do hereby acknowledge that I have read the foregoing Code of Conduct, have attended the induction training, I understand my role and responsibilities to support the project's CESMP, OHS, GBV/SEA/SH, VAC and any other E&S conditions determined by the Project or the World Bank. I understand that any action inconsistent with this COC may result in disciplinary action and may affect my ongoing employment.***

- I have read and understand the contents and of the COC and my responsibilities***
- I have attended the induction training and understand my responsibilities with regards to OHS, GBV/SEA/SH and VAC***

•

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

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

## Appendix 1 Chance Find Procedures

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

In the event that during reconstruction or construction sites of cultural value are found, the following procedures for identification, protection from theft, and treatment of discovered artefacts should be followed and included in standard bidding documents.

Chance find procedures will be used as follows:

- i. Stop the construction activities in the area of the chance find
- ii. Delineate the discovered site or area
- iii. 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 take over
- ii) Notify the supervisory Engineer who in turn will notify the responsible local authorities and the relevant immediately
- iii) Responsible local authorities and the relevant Ministry would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures
- iv) Decisions on how to handle the finding shall be taken by the responsible authorities and the relevant Ministry
- v) Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the relevant Ministry
- vi) 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 Contractor Site Supervisor (CSS) shall monitor the above regulations relating to the treatment of any chance find encountered are observed.

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

## Appendix 2. Grievance Redress Mechanism

All WB projects require a Grievance Redress Mechanism (GRM) that allows affected people/beneficiaries, project staff/volunteers and other stakeholders to provide feedback or to seek satisfactory resolution to grievances they may have in relation to implementation of the Project and its activities. The GRM helps to ensure that the rights and interests of affected people/beneficiaries are protected, and concerns are adequately addressed. The grievance process is based upon the premise that it imposes no cost to those raising the grievances (i.e., complainants); that concerns arising from project implementation are adequately addressed in a timely manner; and that participation in the grievance process does not preclude pursuit of legal remedies under national law. It acknowledges the World Bank's commitment to "do no harm".

During the implementation of the FSM PROPER the PIU will respond to grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. Social grievances that may arise can be related to issues such as disruption of services, community health and safety, temporary or permanent loss of livelihoods, child labor, gender Based Violence, Sexual Exploitation and Abuse, Sexual Harassment and Violence Against Children (GBV/SEA/SH/VAC) and Human Trafficking (HT) and other social and cultural issues.

Environmental grievances that may arise can include issues such as excessive dust or noise generation, damage to infrastructure due to construction related vibrations or transportation of raw material, noise, traffic congestions, changes to land and port access and associated issues.

Should grievance arise, there must be a mechanism through which affected parties can resolve such issues in reasonable manner with the FSM PROPER personnel in an efficient, unbiased, transparent, confidential, timely and cost-effective manner.

Managing grievance of GBV/SEA/SH/VAC and HT requires different approaches than other types of grievances due to:

- sensitivity of issue
- possible involvement of violence
- the potential for survivors to experience stigma, rejection, or harm
- the reluctance of many survivors to come forward.

Additional mechanisms are needed that create safe, enabling spaces for survivors to report GBV/SEA/SH/VAC and HT that offer a safe, ethical, survivor-centered response. Thus, survivor safety, choice, confidentiality and consent must be systematically applied to all grievances of GBV and HT. For this reason, the FSM PROPER GRM includes a specific pathway to receive and resolve grievances of GBV/SEA/SH/VAC and HT related issues.

### **FSM Judiciary Level Grievance**

The project level process will not impede affected persons access to the FSM legal system. At any time, a complainant may take the matter to the appropriate legal (Police) or judicial authority as per the laws of the FSM. These matters may include where an alleged crime had occurred such as illegal drug trafficking, prostitution, child labor, GBV/SEA/SH/VAC and HT. FSM PROPER will not interfere with any formal legal process relating to a grievance.

### **GRM Objectives**

The GRM is to be used as part of the FSM PROPER and will provide an accessible, rapid, fair and effective response to concerned stakeholders, especially any vulnerable individual and/or group who often lack access to formal legal systems.

While recognizing that many grievances may be resolved informally, the Grievances Register (GR) and GRM set out below encourages mutually acceptable resolution of issues as they arise. The GR and GRM has been designed to:

- a) Be a legitimate process that allows for trust to be built between stakeholder groups and assures stakeholders that their concerns will be assessed in a confidential, fair and transparent manner.
- b) Allow simple and streamlined access to the GRM for all stakeholders and provide adequate assistance for those that may have faced barriers in the past to be able to raise their concerns.
- c) Provide clear and known procedures for each stage of the GRM process, and provide clarity on the types of outcomes available to individuals and groups.
- d) Ensure equitable treatment to all concerned and aggrieved individuals and groups through a consistent, formal approach that, is confidential, fair, informed and respectful.
- e) Provide a transparent and confidential approach, by keeping any aggrieved individual/group informed of the progress of their grievance, the information that was used when assessing their grievance and information about the mechanisms that will be used to address it.
- f) Facilitate continuous learning and subsequent improvements to the GRM. Through a process of continuous assessment, the lessons learned may ultimately reduce potential grievances.

### **GRM Eligibility Criteria**

Project affected parties, local communities and other interested stakeholders may raise a grievance at any time to the PIU, CIU, State Coordinators, contractor's site supervisor's, traditional and government elected officials. Affected local communities should be informed

about the FSM PROPER E&S requirements, including its GRM and how to make a grievance. Specific awareness should be conducted with women (and any other identified vulnerable groups within the SEP) in local communities associated with the FSM PROPER on the process of lodging a grievance and specifically the separate pathway for GBV/SEA/SH/VAC or HT, and on how to access other services providers; such as justice, health, counselling and safe accommodation. This will ensure that the FSM PROPER provides a safe, confidential and enabling environment for women to access information and report on any GBV/SEA/SH/VAC and HT issues. Eligibility criteria for the GRM include:

- a) Perceived negative economic, social or environmental impacts on an individual and/or group, or concern about the potential to cause an impact.
- b) Clearly specified types of impact that have occurred or has the potential to occur and explanation of how the project caused or may cause such impact.
- c) Individual and/or group filing of a grievance is impacted, or at risk of being impacted; or the individual and/or group filing a grievance demonstrates that it has authority from an individual and or group that have been or may potentially be impacted on to represent their interest.

### **Grievance Mechanism Pathways and Processes**

The GRM has been designed to be a problem-solving mechanism with voluntary good-faith efforts. The GRM is not a substitute for the legal process. The GRM will as far as practicable, try to resolve grievances on terms that are mutually acceptable to all parties, while recognizing that for some issues, such as GBV/SEA/SH/VAC and HT, a mutual resolution is less likely. When making a grievance, all parties must act, at all times, in good faith and should not attempt to delay and/or hinder any mutually acceptable resolution. However, the GRM also recognizes that for some grievances, such as those of GBV or HT, the survivor will likely face multiple barriers to making a grievance and accessing required support. Where such barriers exist, this should not be construed as deliberate attempts to delay or hinder the resolution process.

The GRM process includes two distinct grievance pathways which include a project general GRM and a GBV/SEA/SH/VAC and HT specific GRM. The processes for the two pathways are detailed below.

#### **General GRM**

The process for the GRM is as follows:

- a) The aggrieved party can present their grievance to the FSM PROPER PIU, State Coordinators, relevant State Authority or Contractor, verbally (by phone or in person) by email or written format.



- b) The initial recipient of the grievance should endeavor to resolve any grievance immediately through informal discussion and/or provision of additional information.
- c) Where the aggrieved person has not submitted the grievance directly to the PIU and he/she/they, are not satisfied, the receiver of the grievance will refer the aggrieved person to the FSM PROPER PIU Project Manager who will (with support from the CIU) attempt to resolve the issue through further informal discussion. For grievances that were satisfactorily resolved informally the incident and resultant resolution will be logged and reported to the PIU Project Manager, and then copied to the CIU (Program Manager and Safeguard Team) to be entered into the Grievance Register (GR). Response to general enquires and low-level grievances should be responded to within 3 days.
- d) Where the grievance has not been resolved, the PIU Project Manager will coordinate with the relevant contractor, authority manager and Secretary of DoFA to develop a response and any actions that are required to resolve the grievance. A response from the PIU with proposed strategies to resolve the issue or with the required information will be sent to the person within 10 days of receipt.
- e) If the matter remains unresolved, or the aggrieved person is not satisfied with the outcome, the PIU Project Manager refers the matter to the Project Steering Committee for a resolution. The PIU Project Manager will take the proposed resolution back to the aggrieved person and log details of issue and resultant resolution status (copy CIU Program Manager and safeguard team). Discussions and resolution to be undertaken within 14 days of receipt.
- f) If it remains unresolved or the complainant is dissatisfied with the outcome proposed by the Project Steering Committee, the aggrieved person may refer the matter to the appropriate legal or judicial authority. A decision of the Court will be final.

Each record is to be allocated a unique number, reflecting year and sequence of received grievance (for example 2020-01, 2020-02 etc.). Grievance records (letter, email, record of conversation) should be stored together, electronically or in hard copy.

Any grievance related to corruption or another criminal offence, with the exception of grievances relating to GBV and HT (which should follow the GBV and HT specific GRM outlined below), needs to be managed confidentially through the following process.

#### **Grievances related to corruption**

- a) The aggrieved party/ies take their grievance to the relevant State Authority whom will immediately notify and refer the grievance to the Municipal, State and/or National Police.

- b) The Authority notifies the PIU Project Manager whom notifies the NORMA/DoFA and CIU (Program Manager and Safeguard team).
- c) If the grievance includes an alleged crime, with exception of GBV/SEA/SH/VAC and HT, the Project Manager will notify the state and national legal offices (e.g., police or Department of Justice) and report the incidence.
- d) Resolution of these grievances will be the responsibility of the legal systems within each state and/or national agencies as dictated by state and national law. In these cases, the projects grievance mechanism will ensure the above due diligence is enacted and due process is documented with the grievance given a grievance number and recorded. Confidentiality associated with all criminal cases must be compliant and follow State and national laws.

### **GBV/SEA/SH/VAC and HT Specific GRM**

Survivor-centered guiding principles will be systematically applied through all steps and actions. These guiding principles are as follows:

- The safety of the survivor shall be ensured at all times. Potential risks to the survivor will be identified and action take to ensure the survivor's safety and to prevent further harm including ensuring that the alleged perpetrator does not have contact with the survivor. If the survivor is an employee, reasonable adjustments may be made to the survivor's work schedule and work environment to ensure their safety.
- All actions should reflect the choices of the survivor.
- All information related to the case must be kept confidential and identities must be protected. Only those who have a role in the response to an allegation should receive case-level information, and then only for a clearly stated purpose and with the survivor's consent.
- The survivor must provide informed consent to progress with each stage of the grievances process. Survivors may withdraw their consent during the process at any time.

Any grievance related to GBV/SEA/SH/VAC, or HT needs to be managed confidentially through the following process:

#### **Step 1: Receive the Grievances of GBV/SEA/SH/VAC and HT**

- a) Grievances of GBV/SEA/SH/VAC and HT can be received by:
  - The existing channels of the GRM.

- The GBV service providers, trainers, women’s rights advocates who are women and experienced in responding to GBV/SEA/SH/VAC an HT
- Division of Anti-Human Trafficking Services (DAHT), Department of Justice (DoJ).

The person who received the grievance will:

- Tell the survivor about the closest GBV/SEA/SH/VAC service providers including justice, health, safe accommodation and/or counseling (Appendix 6). In cases with suspected HT, the survivor will also be given information about the Division of Anti-Human Trafficking Services within the DoJ.
- Document and register the allegation using Form A in Appendix 7.
- Explain the GBV/SEA/SH/VAC grievances and reporting process to the survivor including:
  - The process.
  - That they (the survivor) can choose whether they want to make a formal grievance to the project.
  - That if they choose to make a formal grievance to the project:
    - They control whether and how information about the case is shared with other agencies or individuals.
    - All information will be kept confidential. Only those who will respond to the case will be told about their grievance.
    - If they agree, another person will contact them to talk with them more about their grievance and explain that they can choose whether this is a man or a woman. It should also be identified who these people are in case there are concerns about speaking to a specific person (for example, if they are related to / close to the alleged perpetrator).
    - They can change their mind and withdraw their consent at any time and the process will stop.
  - Information about the grievance will be kept confidential. Information captured on Form A in Appendix 7, should not identify the survivor, perpetrator or include any other information that will identify the survivor of specific situation.
  - If the survivor chooses to make a formal grievance to the GRM, communicate the allegation to PIU Project Manager.
  - If the survivor chooses not to make a formal grievance to the GRM, they should be reminded about the closest GBV service providers and told that if they change their mind, or if something else happens, they can always make a grievance in the future.

- b) If the survivor of the alleged violence is a child, under the age of 18 years of age, while mandatory reporting does not apply to FSM PROPER, it is considered good practice for any suspected or known harm to children to be reported to the police or a welfare officer for further investigation. Where the alleged abuse is criminal, such as physical or sexual violence or neglect by parents or caregivers it should be reported to the police with the consent of the child and / or their guardian.
- c) If the person making the grievance is the survivor (the person who the alleged violence was directed towards) and the grievance relates to other forms of GBV, the person who received the grievance will:
- Tell the survivor about the closest GBV service providers (Appendix 6).
  - Document and register the allegation using Form A in Appendix 7.
- d) If the person making the grievance is a third party (not the person who the alleged violence was directed towards such as a family member, community member, colleague, friend), the person who received the grievance will:
- In cases of **GBV/SEA/SH/VAC**:
    - Document and register the allegation using Form A in Appendix 7.
    - Explain that the project cannot receive third-party grievances because we need to make sure the survivor is safe and that we are acting in their best interests.
    - Ask them to tell the survivor about the available options for reporting or accessing support services.
  - In cases of **HT**:
    - Tell the person that they can also talk with the Division of Anti-Human Trafficking Services within the DoJ and provide the contact details.

## **Step 2: Communicate with the Survivor – Ongoing**

- a) PIU Project Manager should be the only person to communicate with the survivor. Where the survivor has chosen to speak to a woman, a woman (who has been trained in handling grievances of GBV and HT) will be delegate this role by the PIU Project Manager.
- b) This communication should include:
- Responding to any questions or concerns from the survivor.
  - Ensuring that the survivor has received appropriate support.
  - Asking for the survivor’s consent (Appendix 7) at each stage in the process.

- Gathering any further information that may be required from the survivor.
  - Explaining that where the allegation involved a criminal offence the survivor should consider going to the police.
- c) The survivor will be provided ongoing feedback on the development and outcome of their case but especially when:
- The grievance is received.
  - The case is referred to the PIU Project Manager.
  - The verification process commences or when a determination is made that there is an insufficient basis to proceed.
  - The outcome of the verification process and any disciplinary action.
  - When disciplinary action has been.

**Step 3: Assess if the Allegation is likely linked to the project**

- a) The PIU Project Manager will determine the likelihood of the allegation being linked to a project.
- b) If the allegation is determined to be likely linked to a project, the PIU Project Manager will:
- Inform DoFA within 48 hours of the determination being made sharing only the following information:
    - The nature of the allegation
    - If the alleged perpetrator is, to the survivor’s best knowledge, associated with the project (yes/no)
    - The survivor’s age and/or sex (if available)
    - If the survivor was referred to services.
  - FSM PROPER PIU must notify the World Bank Task Team immediately sharing only the same information. No further information, including name and contact details of the survivor or alleged perpetrator should be shared with the World Bank Task Team (or anyone else, except in the context of referral for services or verification, with the consent of the survivor).

**Step 4: Verify and Act**

- a) If an allegation is determined to be likely to be linked to a project, the PIU Project Manager will convene the ad hoc GBV/SEA/SH/VAC and HT Grievance Committee who will:

- Convene a meeting to review the grievance and decide on the verification process within 48 hours of the determining that the allegation is likely linked to the project. The goal of the verification is to:
  - Determine the likelihood that the incident occurred.
  - Recommend disciplinary measures towards the alleged perpetrator.
- Interview all the people involved to gather as much information as possible about what happened. This will usually include interviewing:
  - The survivor.
  - Any witness(es).
  - If there are people that the survivor has told about the incident.
  - Review any other evidence, if available, like text messages or social media posts.
  - The alleged perpetrator.
  - Sometimes there will only be limited information<sup>3</sup>. Building trust with the survivor is very important because the more that they trust the project, the more that they might share about what happened which will help with the verification.
- After gathering the available information, the GBV and HT Grievance Committee should determine whether it is likely that the incident did or did not occur within and completed within 14 days of starting the verification process. It is not the role of the ad hoc GBV and HT Grievance Committee or the project to investigate an allegation and determine if it did or did not happen. This is the role of the police and courts. The role of the ad hoc GBV and HT Grievance Committee is to determine the likelihood that the incident occurred given the information available.
- If it is determined that it was likely to occur, disciplinary action should then be agreed.

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<sup>3</sup> In most SEA and SH cases:

- Often there are no witnesses to the alleged incident. Often the alleged perpetrator makes sure that no one sees or knows about the incident but this did not mean that the incident did not happen. Someone making a complaint of SEA or SH does not need to provide a witness or 'evidence' to prove their claim. Survivors face multiple barriers to reporting SEA and SH. When people overcome so many barriers to report SEA and SH, it is unlikely that they are lying. When people come forward we need to make sure that these people are supported even if there is not clear evidence one way or another.
- The person alleged of the violence will often deny that they did what was/is alleged or might they will say it was consensual. Just because the person denied the allegation does not mean it did not happen.
- The survivor may not tell the whole story straight away. They might leave out parts of the story of what happened because they are afraid that they might not be believed or that they will be blamed for what happened. This does not mean the incident did not occur.

- All verification steps and meetings must be documented with information kept confidentially.

The survivor can report the allegation to the police at any time and does not need to inform the PIU Project Manager or GBV/SEA/SH/VAC and HT Grievance Committee that they are doing or have done this. If the survivor chooses to make a grievance to the police this process is separate to the GRM verification.

The GBV/SEA/SH/VAC and HT Grievance Committee may decide to suspend the alleged perpetrator from their employment while the police are investigating / court is hearing the case. However, in FSM the average time to resolve a sexual offences case is 2 years so this will likely not be practical in most situations.

b) If the ad hoc GBV/SEA/SH/VAC and HT Grievance Committee decides that it is likely that the allegation occurred, the employer of the perpetrator implements the recommended disciplinary action, which is proportional to the nature and severity of the incident; in accordance with local legislation, the employment contract and the code of conduct.

- Sanctions applied by the perpetrator's employer may include:
  - Informal warning.
  - Formal warning.
  - Additional training.
  - Loss of salary for a period of time.
  - Suspension of employment (without payment of salary), for a period of time.
  - Termination of employment.
  - Referral to the police or other authorities as warranted, with the consent of the survivor.

c) Once it is confirmed that disciplinary action has been taken by the employer of the perpetrator the case is resolved.

d) In cases of GBV/SEA/SH/VAC and HT related to the project, compensation will not be paid to the survivor or anyone else (i.e., their relatives or community) as such processes are most often not administered using a survivor-centered approach.

e) In cases of GBV/SEA/SH/VAC and HT related to the project, community leaders and customary methods of conflict resolution will not be used as such processes are most often not administered using a survivor-centered approach.

#### **Step 5: Document and Monitor Grievances of GBV/SEA/SH/VAC and HT**

- a) Each individual grievance of GBV or HT will be documented and registered using Form A.
- b) Informed consent will be captured using Form C.
- c) Each record is to be allocated a unique number, reflecting year and sequence of received grievance (for example 2020-01, 2020-02 etc.).
- d) The PIU Project Manager will compile quarterly reports to DoFA and DoJ with:
  - The number of grievances related to GBV and HT disaggregated by the number of grievances where:
    - That the survivor was referred to GBV / human trafficking services.
    - The case was referred to authorities (with the participation and consent of the survivor).
    - The survivor chooses not to make / withdraw a formal grievance.
    - The project investigated and:
      - It was not linked to the project (but the survivor was referred to GBV / human trafficking services).
      - Did not determine that there was a breach of the Code of Conduct.
      - Took disciplinary action against the alleged perpetrator.
      - These reports should be numerical only and not contain any information with the potential of being identifying, including names and contact details of survivors, their families, or of alleged perpetrators.
- e) All grievance records (letter, email, record of conversation) should be stored together, electronically or in hard copy in a confidential and secure location.

### How to Get in Touch with the Project

Anyone can ask for information on the project, express a concern, make a grievance (grievance) or get in touch with the project for any reason. Grievances/concerns can be anonymous, treated confidentially and the various ways to get in touch with the project are provided in the Table 8.1 below.

**Table 8.1** GRM contacts

FSM PROPER NATIONAL CONTACTS	
Program GRM	Okean Ehmes FSM PROPER Project Manager FSM NORMA FSM National Government 691-320-2700   M: 920-7814 okean.ehmes@norma.fm  Address: Ambrose Building 2nd Floor



	<p>PO Box PS-122  Pohnpei, FM 96941  Website: <a href="http://www.norma.fm">www.norma.fm</a></p>
<b>GBV/SEA/SH/VAC &amp; HT GRM</b>	<p>Mr. Stuart Penias  Acting Chief of Social Affairs  FSM Department of Health &amp; Social Affairs (DHSA)  By Phone: (691) 320-4682  By Email: <a href="mailto:SPenias@fsmhealth.fm">SPenias@fsmhealth.fm</a>  In Person: C/o Department of Health &amp; Social Affairs, Room 5, Capital Suite, FSM National Government, Palikir, Pohnpei.</p> <p>OR</p> <p>Ms. Lori Williams  Assistant Attorney General  FSM Department of Justice (DoJ)  By Phone: (691) 320-2644  By Email: <a href="mailto:ljw.fsm@gmail.com">ljw.fsm@gmail.com</a>  In Person: C/o Department of Justice, FSM National Government, Palikir, Pohnpei.</p> <p>OR</p> <p>Mr. Kwame Shiroya  Program Officer, Central Implementation Unit (CIU)  FSM Department of Finance and Administration (DOFA)  By Phone: (691) 320-2639  By Email: <a href="mailto:shiroya.k.s@gmail.com">shiroya.k.s@gmail.com</a>  In Person: C/o Department of Department of Finance and Administration, FSM National Government, Palikir, Pohnpei.</p>
<b>POHNPEI</b>	
<b>Program GRM</b>	State Coordinator to be confirmed (TBC)
<b>GBV/SEA/SH/VAC &amp; HT GRM</b>	<p>Ms. Canita R Nakamura  GBV Counsellor  By Phone: (691) 320-2112  By Email: <a href="mailto:rilometoc@prel.org">rilometoc@prel.org</a>  In Person: C/o PREL Office, Dolonier, Nett.</p>
<b>CHUUK</b>	
<b>Program GRM</b>	State Coordinator (TBC)
<b>GBV/SEA/SH/VAC &amp; HT GRM</b>	<p>Ms. Christina "Kiki" Stinnet  President – Chuuk Women Council  By Phone: (691) 330-8397  By Email: <a href="mailto:kikistinnetcwc@gmail.com">kikistinnetcwc@gmail.com</a>  In Person: CWC, Tongen Inepwinepw Counseling Center</p> <p>OR</p> <p>Ms. Jasyuri Fritz</p>

	Assistant Coordinator/ ANT Focal Pont-Chuuk FSM Department of Justice DoJ) By Phone: (691) 330-5977 By Email: <a href="mailto:j.fritz.fsm@gmail.com">j.fritz.fsm@gmail.com</a> In Person: FSM National Police Office, Weno
<b>KOSRAE</b>	
<b>Program GRM</b>	State Coordinator (TBC)
<b>GBV/SEA/SH/VAC &amp; HT GRM</b>	Ms. Beverly Wabol Council Member Kosrae Women's Association By Phone: (691) 370-3008/3208 By Email: <a href="mailto:beverlywabol@gmail.com">beverlywabol@gmail.com</a> In Person: Department of Education, Kosrae State Government, Tofol.  OR  Ms. Lelean Kephas Assistant Coordinator/AHT Focal Point - Kosrae FSM Department of Justice By Phone: (691) 370-3008/3208 By Email: <a href="mailto:lelean.kephas@doi.gov.fm">lelean.kephas@doi.gov.fm</a> In Person: Kosrae Anti-Human Trafficking Office, Tofol.
<b>YAP</b>	
<b>Program GRM</b>	State Coordinator (TBC)
<b>GBV/SEA/SH/VAC &amp; HT GRM</b>	Ms. Linda Teteth Women Interest officer Women Interest Office By Phone: (691) 350-5973 By Email: <a href="mailto:lmteeth@gmail.com">lmteeth@gmail.com</a> In Person: Women Interest Office, Yap State Government.

**Appendix 3      Abbreviated Environmental and Social Impact  
Assessment Template (AESIA)**

DRAFT



FSM National Oceanic  
Resource Management  
Authority

**Federated States of Micronesia  
Pacific Islands Regional Oceanscape Program Second Phase for Economic  
Recovery and Resilience (PROPER)  
(P178237)**

**Abbreviated Environmental & Social  
Impact Assessment Template**

**Draft 1  
Date**

DRAFT

## Document Control

Date	Version	Description	Name
	1		

DRAFT

## Contents

DRAFT

## Abbreviations


DRAFT



## Executive Summary

Briefly describe the Activity the major impacts and risks and the mitigation strategies for those risks

DRAFT

## 1. Introduction

Brief overview of the Activity

## 2. Location

Brief description of Activity location. Use maps and figures to illustrate

## 3. Environmental and Social Baseline

### 3.1 Environmental baseline

Brief description of the site and surrounding environment with a focus on any sensitive receptors such as watercourses, coral reefs rainforest etc.

### 3.2 Social baseline

Brief description of current activities on the site the surrounding community and economic activities with a focus on any sensitive receptors such as school, hospitals, vulnerable groups, etc.

## 4. Regulatory Framework

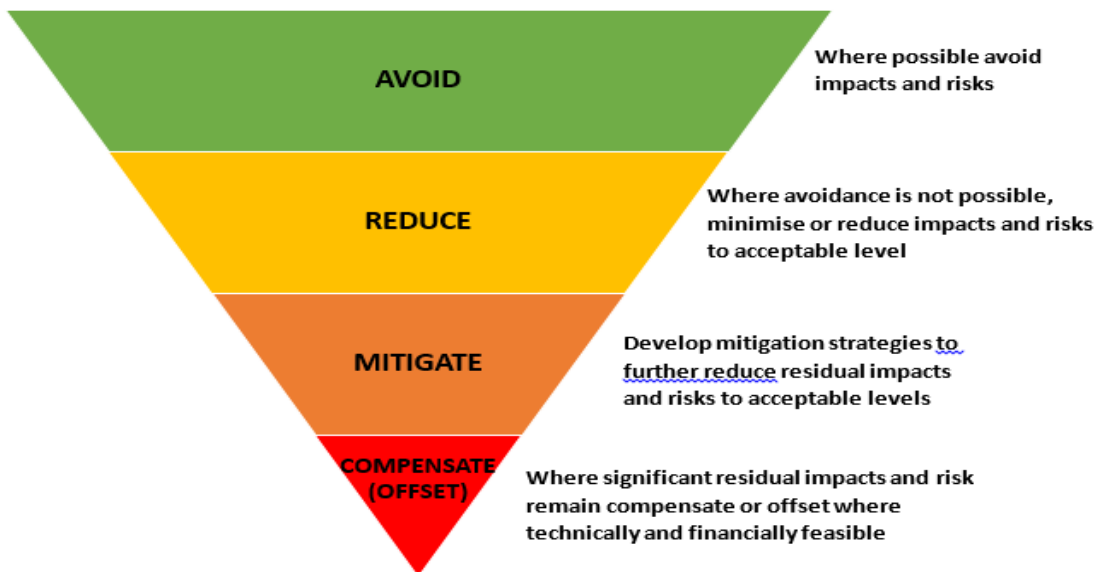
Detail only any National or State permits or approvals that are required for the Activity.

## 5. Potential Environmental and Social Impacts and Mitigation

Briefly describe expected environmental and social impacts expected from the Activity.

To address the potential adverse impacts and risks of the Activity, mitigation measures are developed to avoid and/or minimize the impacts and risks on the biophysical and social environment surrounding the Activity site utilizing the mitigation hierarchy detailed in **Figure 5.1**. Negative impacts and risks during the various phases of the Activity are considered and strategies to avoid and/or minimize the impacts, in a best way possible, will be implemented. **Table 5.1** details the impacts, risks and mitigation strategies. These mitigation strategies will be transferred into a Contractors Environmental and Social management Plan (CESMP) which will detail all the actions the contractor will be required to undertake during works.

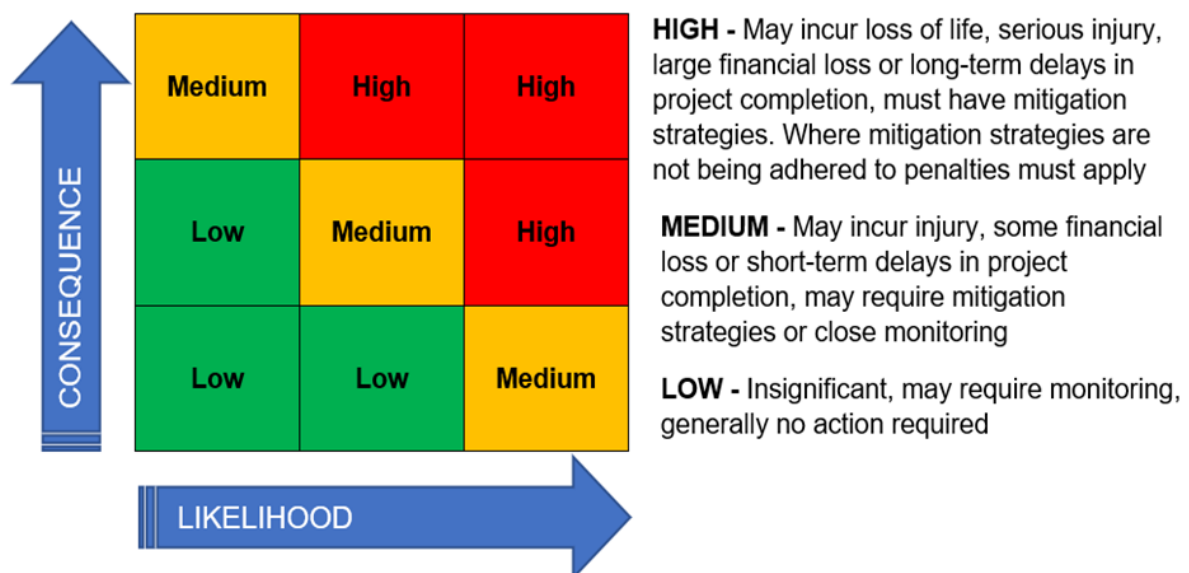
**Figure 5.1 Mitigation Hierarchy**



### 5.1 Impact Risk Rating

For the purpose of this AESIA an impact is the expected outcome of an action and risk is the chance that the impact will occur, calculated as potential consequences of harm by the likelihood of the event occurring. Risk analysis for this AESIA was undertaken using the likelihood- consequence matrix detailed in **Figure 5.2**. The risk of the Activity is considered medium as the implementation of the Activity may cause erosion, noise and waste pollution, injuries and grievance which mitigation measures are developed.

**Figure 5.2 Risk Matrix**



**Table 5.1 Impacts, risks, mitigation, responsibility**

Potential Impacts/Risks	Risk Rating	Mitigation	Responsibility
<b>Pre-approval/design phase</b>			
<b>Implementation/construction phase</b>			

## 6. Requirement for Construction Bidding Documents and E&S Mitigating Cost Estimates

The following **Table 6.1** should be included in the bidding documents along with the CESMP template for the construction phase of the Activity. To implement the management of the E&S mitigation strategies the contractor will be required, with the support of the PIU to develop a CESMP. Development of the CESMP will be undertaken at the contractor’s expense and must be included in all bids for the bids to be valid.

**Table 6.1 E&S requirements and estimated costs for bidding documents**

Potential Impacts/Risks	Mitigation	Contractors Requirements	Estimated Cost
All	<b>Develop and implement the CESMP</b>	<b>Develop in collaboration with the PIU a CESMP, implement and train staff on CESMP including OHS</b>	<b>USD5,000</b>
Degradation of flora and fauna	The contractor should ensure that there is minimal disturbance to the Activity site area The contractor shall as much as possible complete the works in such a manner that natural aesthetics shall be retained at the location. Guidance included in the CESMP	The contractor to have a basic understanding of the site parameters and requirements for any earth works or other site disturbances during works	Contractor to include costs, if any, when bidding
Water quality	The contractor will ensure proper demarcation of the Activity area to be affected by the works. Works to limit vegetation removal at the Activity site; Any excavation activities should not interfere with local drainage or introduce physical changes that are not in harmony with the physical setting of the Activity area.	The contractor to have a basic understanding of the site parameters and requirements for any earth works or other site disturbances during works	Contractor to include costs, if any, when bidding

Potential Impacts/Risks	Mitigation	Contractors Requirements	Estimated Cost
	Retention of grass, herbaceous plants, shrubs and trees, to the extent possible on the Activity site Guidance included in the CESMP		
	Ensure proper handling, storage and disposal of waste oil, lubricants, oil filters and fuel from vehicles Guidance included in the CESMP	Best practice to be undertaken by the contractor and detailed in CESMP	Contractor to include costs, if any, when bidding
Noise and vibration	Undertake works at suitably agreed times that do not impact the community adversely Observe a common-sense approach to vehicle use, and encourage drivers to switch off vehicle engines when not in use Provision of appropriate PPE (hearing protection ear muffs) to the workers and any other person visiting the site Guidance included in the CESMP	Standard best practice to be undertaken by the contractor and detailed in CESMP	Contractor to include costs, if any, when bidding
Solid waste	Ensure all solid waste is deposited to approved landfill sites or in a manner that is acceptable to the community Guidance included in the CESMP	Best practice to be undertaken by the contractor and detailed in CESMP	Contractor to include costs, if any, when bidding
Local employment	Where possible use locals and local businesses Guidance included in the CESMP	Contractors to priorities local employment and businesses	No cost
Occupational health and safety	Contractor to conform to all OHS laws and regulations All construction workers should be inducted on the health and safety requirements while at Activity site Workers should be provided with adequate and appropriate PPE (safety helmets, shoes, gloves, mask,) and enforce on use of the PPE's Provision of clean and accessible sanitary facilities and water to workers Install safety signage at the work site should be done by a trained certified, experienced personnel Contractor to report immediately to the PIU any OHS incidents Guidance included in the CESMP	Best practice to be undertaken by the contractor and detailed in CESMP	Contractor to include costs, if any, when bidding
Social disruption	Non local workers to treat locally community with respect and follow the code of conduct (COC) as outlined in the CESMP)	Detailed in CESMP	No cost
COVID - 19	All the current at time of construction COVID-19 prevention measures should be observed and may include the following:	Contractor to comply with COVID 19 mandates at time of construction	Contractor to include costs, if any, when bidding

Potential Impacts/Risks	Mitigation	Contractors Requirements	Estimated Cost
	<ul style="list-style-type: none"> <li>• Wearing prescribed and appropriate PPE (masks) on site at all times.</li> <li>• Regularly washing hands, sanitizing and observing social distancing at all times</li> <li>• Seeking healthcare services immediately one experiences any of the following symptoms (while at home or work): cough, fever and shortness of breath.</li> </ul>		

## 7. Conclusion and Summary of Required Actions

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## Appendix 4 Guiding principles for Abbreviated resettlement Action Plan (ARAP - if required)

TERMS	MEANING
Project Affected People (PAP)	For the purpose of this document; any person that has a loss or reduction in livelihood as a direct result from Program activities
Livelihood Maintenance Strategy	A public document which specifies the procedures and actions to be undertaken to mitigate adverse effects, compensate losses and provide assistance to those PAP households that are temporarily impacted by civil works
Vulnerable People	Project Affected People who, by virtue of gender, ethnicity, age, physical or mentally disability, economic disadvantage, or social status, may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits

### 1 Introduction

This Livelihood Maintenance Strategy has prepared in the likelihood that individuals or groups have been identified during the impact and risk assessment (ESF – ESS1) phase of Activity and require temporary relocation or some other mitigation strategy to ensure that the livelihoods are not adversely impacted.

### 2 Key Principles

If required the temporary moving of markets and/or stall vendors will be conducted in accordance with the following principles:

1. All other possible strategies should be considered before any vendors are moved.
2. Any strategy should be undertaken with the full engagement of the PAPs.
3. PAPs should be assisted in their efforts to move at no cost to them if required,
4. PAPS should be provided prompt and effective compensation at full costs if costs are incurred (including without depreciation or deduction for tax arrears, licensing or registration fees, or for any other purpose).
5. If new sites are to be prepared, replacement facilities and services are provided of a quality at least equivalent to those prior to displacement, or to minimum community standards, whichever is higher. Measures also are taken to ensure that sites do not diminish the quality or availability of facilities or services to surrounding host communities.
6. If the vendor, is required to close temporarily, the owner or operator is compensated for temporary loss of profits.
7. The transition period should be minimized.
8. PAPs should be informed and consulted through culturally appropriate methods/languages during the process, so that their preferences and concerns regarding i arrangements are solicited and considered.

9. Both the draft and final of any agreements are publicly disclosed in a manner and place accessible to PAPs.
10. Monitoring and evaluation arrangements should be established for the PIU to adequately assess the effectiveness of any measures implemented.
11. Methods by which PAPs can pursue grievances will be established as necessary, and information regarding these grievance procedures will be provided to the PAPs.

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**Appendix 5 Kosrae Infrastructure Activities Site Assessments (see separate pdf)**

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**Appendix 6 Yap Infrastructure Activities Site Assessments (see separate pdf)**

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**Appendix 7 Chuuk Infrastructure Activities Site Assessments (see separate pdf)**

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**Appendix 8 Environmental Impact Assessment Statement, Solid Waste Management facility, Weno, Chuuk, FSM (see separate pdf)**

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**Appendix 9 Pre-Feasibility Report for the New Marina at Weno Port  
– September 2023 (see separate pdf)**

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**Appendix 10 Pohnpei Infrastructure Activities Site Assessments (see separate pdf)**

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**Appendix 11 Pre-Feasibility Report for the New Marina at Dekehtik  
Causeway (see separate pdf)**

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