Project for Improving Performance in Public Financial Management (PAFiM)

Environmental and Social Management Plan (ESMP)

22 March 2018

Prepared for
Division of International Development Assistance
Ministry of Finance
Republic of the Marshall Islands
Quality Information

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1 Introduction

This Environmental and Social Management Plan (ESMP) has been prepared for the Project for Improving Performance in Public Financial Management (PAFiM) in the Republic of the Marshall Islands (RMI). The Project will involve civil works for installation of:

- information technology hardware in an RMI Government building (location to be defined); and
- underground fibre-optic cabling to connect various RMI Government buildings to a financial management information system (FMIS).

The civil works will be undertaken in Delap, Majuro Atoll and on Ebeye Island, Kwajalein Atoll in RMI. The Terms of Reference for the ESMP preparation are attached as Appendix A.

2 Project Description

2.1 Project for Improving Performance in Public Financial Management (PAFiM)

The Government of the Republic of the Marshall Islands (RMI) requested the World Bank (WB) to support the Ministry of Finance’s (MoF) medium-term objectives of systems improvement, including an improved financial management information system (FMIS). The FMIS is the primary tool used for recording, monitoring and reporting on budget execution for public financial management (PFM).

The Project for Improving Performance in Public Financial Management (PAFiM) has the following project development objective (PDO): “to improve reliability and timeliness of government information, including financial reporting and socio-economic statistics.”

The project will support improvement in systems, processes and procedures around budget formulation and execution covering internal controls, procurement, accounting and financial reporting. This will include building human resource capacity and strengthening human resource management functions in the Ministry of Finance. The project will contribute to strengthening the government’s capacity to manage public resources to deliver services more efficiently and effectively. The project includes four components:

- **Component 1 Strengthening Public Financial Management (PFM) Environment.** The objective of this component is to strengthen the legal and institutional environment for PFM. Processes, procedures and regulations governing budget formulation, budget execution and financial reporting will be reviewed to ensure that the necessary authorizing environment and guidance is in place;

- **Component 2: Financial Management Information System (FMIS) Procurement, Design and Implementation.** The objective of this component is to implement a new FMIS which will support effective management of public resources. The component would support specification, procurement and implementation of FMIS. In addition to new software, the project will fund the required hardware including a data center, generators and a disaster recovery site for operational continuity.

- **Component 3: Change Management and Human Resource Development.** The objective of this component is to support the implementation of FMIS with stakeholder engagement and development of individual competencies and institutional capacity.
- **Component 4: Household Income and Expenditure Survey (HIES) Implementation.** The objective of this component is to strengthen the capacity of the national statistics organization (EPPSO) to conduct a household income and expenditure survey that meets international quality standards.

- **Component 5: Project Management.** The objective of this component is to support overall management and coordination of the project across the government.

### 2.2 Data Network Infrastructure

The FMIS will comprise the following elements:

- a proprietary software application;

- system servers (expected to be cloud-based) and potentially a local server; and

- local area networks (LAN) on Majuro and Ebeye connecting Government facilities to the FMIS. On Majuro this will require optic-fibre connections between MoF, Ministry of Health (MoH), Public Schools System (PSS) and the National Telecommunications Authority (NTA) as shown on Figure 1. On Ebeye the LAN will connect MoF, MoH and PSS offices as shown on Figure 2. These two Figures are indicative only and should be subject to further confirmation from the FMIS needs assessment.

The LANs will involve below-ground installation of fibre-optic cabling housed in conduit. This will involve digging a narrow trench, using an excavator or trenching machine, to a depth of three feet and emplacement of the conduit. The trench will then be backfilled with excavated material and sealed with concrete at the surface. The total length of trenching on Majuro is expected to be approximately 1,900 metres and on Ebeye 1,100 metres and will be situated beneath the road verges. The LAN will also include pits to house conduit connections.

![Figure 1 Majuro Local Area Network (LAN)](image-url)
There is the possibility that a data centre will be constructed if required by the vendor solution. A data centre would likely require the following hardware components and would be housed in the MoF building:

- Core computing equipment such as servers and server racks;
- Network equipment including routers, switches and modems;
- Storage resources such as hard drives;
- Power and cooling infrastructure including power generators, cooling towers and uninterruptable power supply system (UPS); and
- Other input/output devices such as printers.

The data centre renovations and other necessary building renovations are covered by this ESMP including the risk assessment and the mitigation measures outlined in the following sections. However, once the design and the location of the data centre is further confirmed, it is necessary to update the relevant sections in the ESMP.

3 Regulatory Context

3.1 Marshall Islands Legislation

3.1.1 National Environmental Protection Act 1984

The National Environmental Protection Act 1984 (NEPA Act) establishes the National Environmental Protection Authority (NEPA) the governing body for environmental protection in RMI. NEPA’s primary purpose is to preserve and improve the quality of the RMI natural environment.
The NEPA Act 1984 is supported by a series of eight regulations for protection of surface and marine waters, and air quality, and managing of potential impacts from earth works, sanitation systems, waste and new infrastructure development. The Act and associated Regulations provide the framework for the protection of resources and environmentally-sustainable development in RMI. The relevant Regulations for this project are the Environmental Impact Assessment Regulation 1994 and the Solid Waste Regulations 1989.

3.1.2 Environmental Impact Assessment Regulation 1994

The Environmental Impact Assessment Regulation 1994 (EIA Regulation) is the central environmental planning legislation in RMI. Its aim is to ensure that environmental concerns are given appropriate consideration in decision making for all new infrastructure projects. The EIA regulation requires a preliminary proposal for every development activity, and applies a two-step assessment process to determine the level of assessment required. For projects involving earthmoving, the development proposal is submitted to the RMI EPA via a Major or Minor Earthmoving Permit Application. It is reviewed through an internal RMI EPA Preliminary Environmental Assessment (PEA) process. Step 1 is an initial evaluation of the PEA to determine if the activity has the potential for significant effect on the environment. Step 2 is either the issuance of an Earthmoving Permit with conditions (e.g. Minor and some Major applications), or a requirement for an EIA for proposals (e.g. Major applications) assessed to have potential significant impact which will be reviewed and form the basis of an approved decision with conditions, or a not-approved decision. Conditions pre- or post-EIA may include a requirement for an Environmental Management Plan (EMP). In cases where a proponent ESMP has been drafted prior to the submission of an Earthmoving Permit Application, it may require modification to meet the conditions of approval.

3.1.3 Solid Waste Regulations 1989

The purpose of these regulations is to establish minimum standards governing the design, construction, operation and maintenance of solid waste storage, collection and disposal systems. The Regulations cover the management of bulky waste such as appliances, tree branches or other oversize waste such as interior building cladding. The Regulations also define hazardous waste as any waste or combination of wastes which pose a substantial present or potential hazard to human health or living organisms because such wastes are nondegradable, or persistent in nature, or because they can be lethal, or because they may otherwise cause or tend to cause detrimental cumulative effects. The Regulations list the general requirements for the storage of solid waste as well as detailing the type of containers that may be used to store solid waste. The Regulations also govern the handling of hazardous waste within RMI.

3.2 World Bank Safeguard Policies

3.2.1 OP4.01 Environmental Assessment

As the project involves civil works World Bank Operational Policy (OP) 4.01 Environmental Assessment applies. OP 4.01 “...requires environmental assessment (EA) of projects proposed for Bank financing to help ensure that they are environmentally sound and sustainable, and thus to improve decision making” (World Bank, 2013). The Bank has undertaken environmental screening of the proposed project has determined that the potential environmental impacts are classified as
Category B. This means that the potential impacts are of low to moderate significance, site-specific, mostly reversible and that cost-effective mitigation can be readily designed in the majority of cases.

The purpose of Environmental Assessment is to help ensure the environmental and social soundness and sustainability of investment projects, and to support the integration of environmental and social aspects of projects into the decision making process. The policy defines procedures to screen and assess potential impacts and mitigation, prepare safeguard instruments, ensure public consultation and transparency and that there are implementation and supervision of commitments relating to findings and recommendations of the environmental assessment.

This ESMP is an integral part of compliance with this policy. All activities proposed for funding and implementation under the Project are subject to the provisions and stipulations within this document.

3.3 Occupational Health and Safety

3.3.1 Republic of the Marshall Islands

RMI joined the International Labour Organization (ILO) in July 2007 and has since ratified two ILO Conventions: the Maritime Labour Convention and the Seafarers’ Identity Documents Convention. RMI does not currently have Occupational Health and Safety (OH&S) legislation; however this is being drafted.

In the absence of local legislation, OH&S under this project will be regulated through the World Bank Group’s Environmental, Health, and Safety Guidelines.

3.3.2 World Bank General Environmental, Health, and Safety Guidelines

The World Bank Group’s General Environmental, Health, and Safety Guidelines (EHS Guidelines) (World Bank Group, 2007) represent good international practice for managing occupational health and safety (OH&S) 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. The fundamental premise for OH&S under the EHS Guidelines is that “Employers and supervisors are obliged to implement all reasonable precautions to protect the health and safety of workers” and that “Companies should hire contractors that have the technical capability to manage the occupational health and safety issues of their employees...”.

The overall OH&S philosophy embodied in the EHS Guidelines is as follows:

- **Preventive and protective measures should be introduced according to the following order of priority:**
  - Eliminating the hazard by removing the activity from the work process. Examples include substitution with less hazardous chemicals, using different manufacturing processes, etc;
  - Controlling the hazard at its source through use of engineering controls. Examples include local exhaust ventilation, isolation rooms, machine guarding, acoustic insulating, etc;
  - Minimizing the hazard through design of safe work systems and administrative or institutional control measures. Examples include job rotation, training safe work procedures, lock-out and tag-out, workplace monitoring, limiting exposure or work duration, etc.
• Providing appropriate personal protective equipment (PPE) in conjunction with training, use, and maintenance of the PPE.

The EHS Guidelines also require that prevention and control measures to minimise occupational hazards should be based on comprehensive job safety analyses (JSA). Appendix B contains a Health and Safety Management Plan Guideline which incorporates a basic JSA methodology. It is recommended that the CSU Safeguards Advisor assist the contractor in undertaking the JSA and preparing its Safety Management Plan.

4 Environmental and Social Management Roles and Responsibilities

Three main bodies will constitute the governance arrangements under PAFiM:

• a Steering Committee to provide strategic guidance and decisions for the implementation of the Project;
• an Operational Working Group comprising technical leads from within MoF and relevant line ministries (MoH and PSS); and
• a Project Implementation Unit (PIU) housed in MoF to be responsible for the day-to-day operations and supervision of project consultants and contractors.

The Ministry of Finance (MoF) Devison of International Development Assistance (DIDA) is also establishing a centralized support unit (CSU) to manage projects funded by the World Bank. This Unit will contain procurement, financial management, and safeguards management staff and will provide services to a range of projects.

Environmental and social management for the project will be the responsibility of the Unit’s Safeguards Advisor. The Safeguards Advisor will be based in the CSU and will provide technical assistance to the MoF Project Implementation Units(PIU) for safeguards requirements. The Safeguards Advisor will provide direct oversight of contractor environmental and social performance and will be responsible for managing the grievance redress mechanism.

4.1 Environmental and Social Training

The CSU Safeguards Advisor will be responsible for environmental, social and OH&S training to ensure that contractors understand their responsibilities when implementing the ESMP. It is anticipated that the capacity of local contractors to manage environmental, social and OH&S risks will be relatively low so it will be important to focus the training at project inception stage to ensure that civil works are appropriately planned and managed.

5 Potential Environmental and Social Impacts and Risks

This chapter describes the potential impacts of the project on the physical and human environment. It is noted that all information is derived from existing sources and no field investigations were undertaken. The majority of impacts are associated with the construction phase of the project.

5.1 Asbestos Containing Material

Asbestos containing material (ACM) in this context refers to existing building elements (eg. wall sheeting, roof sheeting, pipework, insulation etc.) that may contain asbestos. Asbestos is a naturally occurring rock fibre that it is harmful to humans. When products containing asbestos are damaged
or wear down over time, small fibres are released and become airborne. Breathing in asbestos fibres can cause a range of diseases including cancer (SPREP, 2016).

The Secretariat of the Pacific Regional Environment Programme (SPREP) undertook a regional asbestos baseline survey in 2015 detailing information about the location and relative risk of asbestos materials on 25 different islands across 13 Pacific Island Countries (PICs), including Republic of the Marshall Islands. The survey included assessment of both residential and non-residential buildings in each country and examined the potential risk to human health from exposure to ACM in each country setting. The risk assessment involved consideration of three factors:

- occupant activity – the activities carried out in an area where ACM is present;
- likelihood of ACM disturbance – evaluated by the extent or amount of ACM and its accessibility/vulnerability; and
- human exposure potential – considering three factors in the area containing ACM: number of occupants, frequency of use and average time of use.

The RMI survey concentrated on Majuro Atoll as “...due to the majority of historical development and population being located there” (SPREP, 2015). In the PICs context RMI contains relatively little ACM in residential and non-residential buildings – 860 square metres (m²) - representing just 0.46% of the total across the 13 countries surveyed by SPREP. In addition, most non-residential ACM in RMI is considered very low to low risk, with 160 m² considered medium risk (SPREP, 2016).

The RMI survey (SPREP, 2015) assessed all 4,707 residential dwellings on Majuro and discovered only one dwelling with potential ACM (PACM). In addition to residential households, the survey sought to identify public buildings and government-owned industrial and commercial properties containing ACM. The primary focus of the survey was on public buildings that would potentially present the most prolonged and thus significant risks for public exposure. 24 individual facilities / properties were identified as requiring a detailed site assessment due to their age, use, sensitive location or observations of PACM. The results of the SPREP assessment are shown in Table 1.

The SPREP survey did not identify the MoF, MoH or PSS buildings as requiring detailed site assessments hence it can be assumed that it is unlikely that these buildings contain ACM. The NTA building was assessed for PACM and it was determined that it was not present.

Aside from residential and non-residential buildings SPREP (2015) noted that “...the greatest source of asbestos which could be readily identified in RMI was the public water system infrastructure” with “...the majority of the public water supply...distributed through Asbestos Cement (AC) pipes.” It would be important therefore to understand the location of the water supply pipework to ensure it is avoided during fibre-optic cable installation.

**Table 1 Public Buildings Assessed for Asbestos Containing Material**

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Suspected PACM?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. EPA Office</td>
<td>No</td>
</tr>
<tr>
<td>2. Majuro Hospital</td>
<td>Yes</td>
</tr>
<tr>
<td>3. Ace Hardware</td>
<td>Yes</td>
</tr>
<tr>
<td>4. College of The Marshall Islands</td>
<td>Yes</td>
</tr>
<tr>
<td>5. Majuro City Hall</td>
<td>No</td>
</tr>
<tr>
<td>6. Weather office</td>
<td>No</td>
</tr>
<tr>
<td>7. Marshall Islands High School</td>
<td>No</td>
</tr>
<tr>
<td>8. Rairok Elementary School</td>
<td>No</td>
</tr>
<tr>
<td>9. Laura Police station</td>
<td>No</td>
</tr>
<tr>
<td>No</td>
<td>Location</td>
</tr>
<tr>
<td>-----</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>10</td>
<td>Ajeltake Elementary School</td>
</tr>
<tr>
<td>11</td>
<td>Delap Elementary School</td>
</tr>
<tr>
<td>12</td>
<td>Ministry of Education Admin Building</td>
</tr>
<tr>
<td>13</td>
<td>Majuro Police Station</td>
</tr>
<tr>
<td>14</td>
<td>OEPPC Office</td>
</tr>
<tr>
<td>15</td>
<td>Majuro Japan Construction Company</td>
</tr>
<tr>
<td>16</td>
<td>Majuro Fire Station</td>
</tr>
<tr>
<td>17</td>
<td>National Telecommunications Authority</td>
</tr>
<tr>
<td>18</td>
<td>Majuro Airport</td>
</tr>
<tr>
<td>19</td>
<td>Post Authority (at the airport)</td>
</tr>
<tr>
<td>20</td>
<td>Woja Elementary School</td>
</tr>
<tr>
<td>21</td>
<td>Laura Dispensary</td>
</tr>
<tr>
<td>22</td>
<td>Ajeltake Police Station</td>
</tr>
<tr>
<td>23</td>
<td>Disused Government Building</td>
</tr>
</tbody>
</table>

Source: SPREP (2015)

The situation with ACM on Ebeye appears similar to Majuro, although the extent of asbestos water supply infrastructure is not as widespread. There is 109 m² of asbestos building roof materials on Kwajalein atoll (Economic Policy, Planning and Statistics Office, 2010) and the main rising main to and ocean outfall from the waste water treatment plant (plus other WWTP pipework) are constructed of asbestos cement pipe (GHD, 2015).

The water supply, sewerage and electricity assets on Majuro are managed, operated and maintained by the Majuro Water Supply and Sewerage Company (MWSC) and on Ebeye the Kwajalein Atoll Joint Utilities Resources (KAJUR) is the responsible utility. Both MWSC and KAJUR operate under the supervision of the Combined Utilities Board (CUB). GHD (2015) compiled the existing GIS and other data sets for water supply infrastructure on Ebeye and these should be available from KAJUR. It is anticipated that similar spatial data would be available from MWSC for the Majuro system.

5.2 Land Access

Virtually all land in RMI is under customary tenure, with the Government leasing portions for public purposes, including Government offices and road easements. It is expected that the proposed optic-fibre infrastructure can be sited wholly on Government-leased land, comprising Government office compounds and road verges. As the land is already under Government lease there will be no need to enter into further lease arrangements with customary landowners.

5.3 Community and Occupational Health and Safety

5.3.1 Community Health and Safety

The potential risks to community health and safety are associated with the project’s construction phase and would mainly comprise minor dust and noise impacts and pedestrian/traffic hazards. The excavation works required for the cable installations are relatively minor and will be limited in duration at any one locality and most of the works will be undertaken. Hence, dust and noise impacts are unlikely to be significant.

During the installation of the fibre-optic cable there will be some disruption to vehicle and pedestrian traffic in the vicinity of the works. As the cable conduit will be laid in the road shoulder traffic disruption is likely to be limited, with the exception of any road crossings which may involve temporary single lane operation for short periods.
There are no risks to community health and safety from the operation of the fibre-optic network.

5.3.2 Occupational Health and Safety

The civil works required for the fibre-optic cable installation comprise “high risk construction work” as defined in the Australian Work Health and Safety Regulations 2011. The specific high risk activities are (Safe Work Australia, 2013):

- work that is carried out on or near energized electrical installations or services;
- work that is carried out on, in or adjacent to a road, railway, shipping lane or other traffic corridor that is in use by traffic other than pedestrians; and
- work that is carried out in an area at a workplace in which there is any movement of powered mobile plant.

The extent and duration of works, the likely workforce involved and the traffic volumes suggest that the OH&S hazards from construction activities are relatively low. While the works involve trenching activities this will not require work within trenches and the depth is less than 1.5 metres.

5.4 Waste Management

The quantities of waste generated from construction activities are likely to be small. There will be some packaging waste from system components and there may be small quantities of residual excavated material from the trenching activities. While the waste quantities are expected to be limited it is important that all waste is stored, handled and disposed of securely to ensure no leakage into the environment. No hazardous waste is anticipated, with the exception of asbestos waste which is unlikely to be encountered.

It will need to be determined whether waste should be disposed to landfill or whether it should be packaged and exported from RMI.

5.5 Water Quality Impacts

There is the potential for minor water quality impacts from sediment contaminated runoff or fuel spills during the cable installation activities. As each section of trench is excavated spoil will be stockpiled adjacent to the trench while the cable is laid. This exposure is likely to be only of short duration with the trenches able to be backfilled immediately after conduit placement.

5.6 Vegetation Impacts

The urban areas of Majuro and Ebeye are sparsely vegetated, with much of the original vegetation having been cleared for residential, commercial and transport development. Hence the remnant vegetation remaining in the urban areas is an important asset for the community and also provides some habitat value, mostly for birds.

During the trenching activities for the cable placement there is the potential for vegetation to be present along the alignment or to encounter tree roots when digging. The cable route should be designed to avoid vegetation as far as possible. Where this is not practicable excavations should be undertaken in such a way as to avoid damage to trees or their roots. Where roots are encountered during the trenching activities these should be left intact and the cable installed so as to avoid the roots and not otherwise cause damage.
6 Risk Assessment and Mitigation Measures

The risk assessment assesses the likelihood and consequence of the potential impacts identified above with the methodology included in Appendix C. The risk assessments for the various impacts identified in Section 5 are summarized below based on this methodology. Table 2 is a risk matrix that combines the probability of occurrence of a particular impact with the consequence of the impact to establish the significance of a particular impact. The tables summarise the expected significance of impacts without mitigation, detail the proposed mitigation measures to mitigate the impacts and summarise the residual impact significance following implementation of mitigation measures.

The assessed significance of the impact can be seen both prior to and after the implementation of mitigation measures. The residual impacts in all cases are considered to be acceptable however this relies on the mitigation measures being satisfactorily implemented by the contractor.

Table 2 Risk Matrix

<table>
<thead>
<tr>
<th>CONSEQUENCE OF IMPACT</th>
<th>PROBABILITY OF OCCURRENCE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Improbable</td>
</tr>
<tr>
<td>Minor</td>
<td>VERY LOW</td>
</tr>
<tr>
<td>Moderate</td>
<td>LOW</td>
</tr>
<tr>
<td>Major</td>
<td>MEDIUM</td>
</tr>
<tr>
<td>Massive</td>
<td>HIGH</td>
</tr>
</tbody>
</table>

6.1 Worker/public exposure to asbestos during construction

<table>
<thead>
<tr>
<th>Extent</th>
<th>Intensity</th>
<th>Duration</th>
<th>Consequence</th>
<th>Probability</th>
<th>Significance</th>
<th>Confidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local</td>
<td>High 3</td>
<td>Long-term 3</td>
<td>Major 7</td>
<td>Improbable</td>
<td>Medium</td>
<td>Moderate</td>
</tr>
</tbody>
</table>

Mitigation measures:
- Obtain plans of asbestos-containing water supply infrastructure from and KAJUR and design optic-fibre cable network to avoid this infrastructure
- Where there are “chance finds” of suspected asbestos containing material, construction works should cease immediately at the location and the contractor must seek advice from the CSU Safeguards Advisor on appropriate management measures

<table>
<thead>
<tr>
<th>Extent</th>
<th>Intensity</th>
<th>Duration</th>
<th>Consequence</th>
<th>Probability</th>
<th>Significance</th>
<th>Confidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local</td>
<td>Low 1</td>
<td>Short-term 1</td>
<td>Minor 3</td>
<td>Improbable</td>
<td>Very low</td>
<td>High</td>
</tr>
</tbody>
</table>

6.2 Unlawful land access or land acquisition
Without mitigation | Wider catchment 2 | Medium 2 | Long-term 3 | Major 7 | Improbable | Medium | High
---|---|---|---|---|---|---|---

Mitigation measures:
- Determine the location of any customary land along the proposed cable alignment through consultation with the Land Registration Authority (LRA) and Kwajalein Atoll Local Government (KADA)
- Design optic-fibre route to avoid customary land and route cable along Government-leased road verges

With mitigation | Local 1 | Low 1 | Short-term 1 | Minor 3 | Improbable | Very low | High
---|---|---|---|---|---|---|---

6.3 Community health and safety incidents during construction

<table>
<thead>
<tr>
<th>Extent</th>
<th>Intensity</th>
<th>Duration</th>
<th>Consequence</th>
<th>Probability</th>
<th>Significance</th>
<th>Confidence</th>
</tr>
</thead>
</table>
| Without mitigation | Local 1 | Medium 2 | Long-term 3 | Moderate 6 | Possible | Low | High

Mitigation measures:
- DIDA to undertake community and stakeholder consultation prior to construction commencing so residents, employees and business owners are aware of forthcoming works and associated risks

With mitigation | Local 1 | Low 1 | Short-term 1 | Minor 3 | Possible | Very Low | Medium
---|---|---|---|---|---|---|---

6.4 Worker health and safety incidents during construction

<table>
<thead>
<tr>
<th>Extent</th>
<th>Intensity</th>
<th>Duration</th>
<th>Consequence</th>
<th>Probability</th>
<th>Significance</th>
<th>Confidence</th>
</tr>
</thead>
</table>
| Without mitigation | Local 1 | Medium 2 | Long-term 3 | Moderate 6 | Probable | Medium | High

Mitigation measures:
- Contractor prepares and implements Worker Health and Safety Management Plan in accordance with the guideline in Appendix B
- Ensure all existing underground services locations are known prior to trenching for fibre-optic cabling

With mitigation | Local 1 | Low 1 | Short-term 1 | Minor 3 | Possible | Very Low | Medium
---|---|---|---|---|---|---|---

6.5 Construction waste deposited into the environment

<table>
<thead>
<tr>
<th>Extent</th>
<th>Intensity</th>
<th>Duration</th>
<th>Consequence</th>
<th>Probability</th>
<th>Significance</th>
<th>Confidence</th>
</tr>
</thead>
</table>
| Without mitigation | Wider catchment | Medium 2 | Medium-term | Moderate 6 | Possible | Low | High
Mitigation measures:
- Contractor to manage all waste in accordance with the relevant provisions of *Solid Waste Regulations 1989* including requirements for the storage of solid waste such as type of containers.
- All waste disposed to the Jable–Batkan landfill or exported from RMI
- Contractor to provide evidence of satisfactory waste disposal (e.g. receipts)

<table>
<thead>
<tr>
<th>With mitigation</th>
<th>Local</th>
<th>Low</th>
<th>Medium-term</th>
<th>Minor</th>
<th>Possible</th>
<th>Very Low</th>
<th>High</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

6.6 Pollution of receiving waters from construction runoff

<table>
<thead>
<tr>
<th></th>
<th>Extent</th>
<th>Intensity</th>
<th>Duration</th>
<th>Consequence</th>
<th>Probability</th>
<th>Significance</th>
<th>Confidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Without mitigation</td>
<td>Wider catchment 2</td>
<td>Low 1</td>
<td>Medium-term 2</td>
<td>Moderate 5</td>
<td>Possible</td>
<td>Low</td>
<td>Medium</td>
</tr>
</tbody>
</table>

Mitigation measures:
- Limit the extent of open cable trench at any one time and avoid excavations when rain is anticipated
- Ensure all hazardous materials (including fuels) are stored in bunded/secure enclosures at contractor’s compound

<table>
<thead>
<tr>
<th>With mitigation</th>
<th>Local</th>
<th>Low</th>
<th>Short-term</th>
<th>Minor</th>
<th>Possible</th>
<th>Very Low</th>
<th>High</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>3</td>
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</tbody>
</table>

6.7 Vegetation damage from cable trenching activities

<table>
<thead>
<tr>
<th></th>
<th>Extent</th>
<th>Intensity</th>
<th>Duration</th>
<th>Consequence</th>
<th>Probability</th>
<th>Significance</th>
<th>Confidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Without mitigation</td>
<td>Island 3</td>
<td>Medium 2</td>
<td>Long-term 2</td>
<td>Major 7</td>
<td>Possible</td>
<td>Medium</td>
<td>High</td>
</tr>
</tbody>
</table>

Mitigation measures:
- Design cable route to avoid existing vegetation as far as practicable
- When trenching in the vicinity of existing trees the presence of tree roots should be anticipated. In these situations it is recommended that excavations be undertaken by hand to identify the extent of root systems and ensure they are avoided
- If tree roots are encountered during trenching activities these should not be damaged and the cable rerouted to avoid impacts

<table>
<thead>
<tr>
<th>With mitigation</th>
<th>Local</th>
<th>Low</th>
<th>Short-term</th>
<th>Minor</th>
<th>Improbable</th>
<th>Very Low</th>
<th>High</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>3</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

6.8 Contractor Bid Document Environmental, Social, Health and Safety Clauses

The following environmental, social, health and safety clauses shall be incorporated in the Specifications to the bid documents for the works.
6.8.1 General

- The Contractor shall comply with the Statutory Regulations in force in Republic of the Marshall Islands regarding environmental protection and waste disposal and shall liaise with the responsible national environmental authorities.

6.8.2 Potential Asbestos Containing Material

- If, during the course of construction, materials, structures or other infrastructure is discovered that has the potential to contain asbestos the Contractor should immediately cease works and contact the Safeguards Adviser for advice.

6.8.3 Community and Worker Health and Safety

- The Contractor shall at all times implement all reasonable precautions to prevent and reduce accidents and injuries to staff and workers and protect the health and safety of the community.
- The Contractor shall prepare and implement a Worker Health and Safety Plan commensurate with the identified health and safety hazards.
- The Contractor shall at all times provide and maintain construction plant, equipment and systems of work that are safe and without risks to health. This shall include maintaining equipment, engines, and related electrical installations in good working order; maintaining a clean and tidy work space; providing guards and rails, signals and lighting; providing work site rules, safe working procedures and allocating appropriate places to carry out the work.
- The Contractor shall provide, at his/her own expense, the protective clothing and safety equipment to all staff and labour engaged on the Works to the satisfaction of the Engineer. Such clothing and equipment shall include, as a minimum:
  - high visibility vests for workers directing traffic;
  - protective boots and gloves for the workforce undertaking excavation works;

  If the Contractor fails to provide such clothing and equipment, the Employer shall be entitled to provide the same and recover the costs from the Contractor.

- All the Contractor’s personnel shall, before commencing work, have an induction course on safety and health at the site. The information and training shall be on the site and have duration of at least two hours.
- The Contractor shall prepare and implement and Traffic and Pedestrian Management Plan to ensure that any hazards caused by the works are adequately managed.

6.8.4 Waste Management

- The Contractor shall, at all times, keep the construction area, including storage areas used, free from accumulations of waste materials or rubbish.
- All waste shall be stored, handled and disposed in accordance with the requirements of the Solid Waste Regulations 1989 or as otherwise directed by the Engineer.
- All waste water and sewage from construction facilities shall be managed in accordance with local government regulations, and where and when such regulations require it the Contractor shall obtain a permit or other appropriate documentation approving the storage, treatment and disposal methods being used.
6.8.5 Prevention of Water and Air Pollution

- The Contractor’s construction activities shall be performed by methods that will prevent entrance, or accidental spillage, of solid matter, contaminants, debris, and other pollutants and wastes into marine waters and underground water sources. Such pollutants and wastes include, but are not restricted to, refuse, garbage, cement, sanitary waste, and oil and other petroleum products.

- Excavated materials or other construction materials shall not be stockpiled or deposited near or on waterbody perimeters or in a position where stormwater runoff can entrain sediment and cause turbidity in waterbodies.

- Wastewaters from concrete preparation, or other construction operations, shall not enter waterbodies without the use of control methods such as sediment filters.

- During the conduct of construction activities and operation of equipment, the Contractor shall utilise such practicable methods and devices as are reasonably available to control, prevent, and otherwise minimise atmospheric emissions or discharges of air contaminants.

- Equipment and vehicles that show excessive emissions of exhaust gases due to poor engine adjustments, or other inefficient operating conditions, shall not be operated until corrective repairs or adjustments are made.

- During the performance of the construction works the Contractor shall carry out proper and efficient measures wherever and as often as necessary to reduce the dust nuisance, and to prevent dust which has originated from its operations from damaging dwellings, or causing a nuisance to persons.

6.8.6 Preservation of Vegetation

- All trees and other vegetation shall be preserved and shall be protected from damage by the Contractor’s construction operations and equipment.

- Movement of labour and equipment for access to the work shall be performed in a manner to prevent damage to vegetation or property.

6.8.7 Construction Facilities

- The Contractor’s workshops, office, and yard area shall be located and arranged in a manner to preserve trees and vegetation and minimise impacts to local communities.

- On completion of works, all temporary buildings, including any concrete footings and slabs, and all construction materials and debris shall be removed from the site.

7 Consultation and Grievance Redress Mechanism

7.1 Consultation Plan

Given the limited extent and duration of the civil works, and the location, consultation with project affected people should involve two phases:

1. direct engagement with neighbouring residents and businesses along the proposed fibre-optic cable routes. This consultation will be required to inform the residents and business owners of the potential disruption associated with the cable installation. This consultation should be
undertaken face-to-face and should describe the scope of works, timing and likely impacts, together with details of the grievance redress mechanism. Consultation should be undertaken once the cable routes are determined and then again two weeks prior to construction commencing; and

2. public notification of civil works. As the cable installation has the potential to cause disruption and inconvenience to a large proportion of the population on Majuro and Ebeye public notices should be published to advise of the proposal and also the timing and duration of construction works.

Consultation should be undertaken by DIDA and the Consultation Plan developed and overseen by the Safeguards Advisor.

7.2 Grievance Redress Mechanism

A grievance redress mechanism (GRM) is presented below to uphold the project’s social and environmental safeguards performance. The purpose of the GRM is to record and address any complaints that may arise during the implementation phase of the project and/or any future operational issues that have the potential to be designed out during implementation phase.

The key objectives of the GRM are:

- Record, categorize and prioritize the grievances;
- Settle the grievances via consultation with all stakeholders (and inform those stakeholders of the solutions);
- Forward any unresolved cases to the relevant authority.

As the GRM works within existing legal and cultural frameworks, it is recognized that the GRM will comprise community level, project level and RMI judiciary level redress mechanisms. The details of each of those components are described as follows.

7.3 Community Level Grievances

Community level grievances may result from construction impacts such as noise and dust. All project activities on Majuro and Ebeye are expected to be sited on Government-leased land hence grievances related to customary land ownership are not anticipated.

Issues caused by the project are raised and resolved through existing community level grievance redress mechanisms and will be recorded by DIDA which is responsible for recording all complaints/outcomes, and to provide assistance, as required for their resolution.

7.4 Grievance Redress Mechanism

The following grievance redress mechanism (GRM) shall be put in place to register, address and resolve complaints and grievances raised by stakeholders during implementation of the Project. Contractors are required to adhere to this formal process.

Complaints may be submitted in person, via telephone, electronically, in letter to the PIU. All complaints must be formally registered in the complaint register. Should the complaint be received by the Contractor’s Site Supervisor directly, they will endeavour to resolve it immediately and submit notification of the complaints and resolution to DIDA for entry into the complaints register. For all
grievances DIDA is responsible for ensuring that, on receipt of each complaint, the date, time, name and contact details of the complainant, and the nature of the complaint are recorded in the Complaints Register.

Should the complainant remain unsatisfied with the response of the Contractor’s Site Supervisor, the complaint will be referred to the PIU Project Manager (PM). The PM and Safeguards Advisor will take earnest action to resolve complaints at the earliest time possible. It would be desirable that the aggrieved party is consulted and informed of the course of action being taken, and when a result may be expected. Reporting back to the complainant will be undertaken within a period of two weeks from the date that the complaint was received.

If the PM is unable to resolve the complaint to the satisfaction of the aggrieved party, the complaint will then be referred to the Project Steering Committee (PSC). The PSC will be required to address the concern within 1 month.

Should measures taken by the Project Steering Committee fail to satisfy the complainant, the aggrieved party is free to take his/her grievance to the RMI Court, and the Court’s decision will be final.

To ensure broad public awareness of the grievance mechanism, the Project shall erect appropriate signage at all works sites with up-to-date project information and summarizing the GRM process, including contact details of the relevant Contact Person. Public information bulletins websites and other public information will also include this information. Anyone shall be able to lodge a complaint and the methods (forms, in person, telephone, forms written in Marshallese) should not inhibit the lodgement of any complaint.

8 Budget
The following is an indicative budget for implementing the EMSP. These items are over and above those considered to be covered by normal operations and normal duties of the Safeguards Advisor and the Project Manager.

<table>
<thead>
<tr>
<th>Budget Item</th>
<th>Detail</th>
<th>Cost Estimate (USD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stakeholder consultations</td>
<td>Catering, venue hire, media, materials, travel and accommodation, translation and interpretation services, etc.</td>
<td>5,000</td>
</tr>
<tr>
<td>Institutional Training</td>
<td>Venue, stationery, refreshments, training materials</td>
<td>5,000</td>
</tr>
<tr>
<td>Disclosure of safeguards</td>
<td>Translation, report production, distribution</td>
<td>3,000</td>
</tr>
<tr>
<td>instruments</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Monitoring and reporting</td>
<td>Travel and accommodation costs in Ebeye; report production costs (non-staff costs);</td>
<td>8,000</td>
</tr>
<tr>
<td>GRM related costs</td>
<td>Personnel, communication, transportation, office support costs</td>
<td>5,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total: 26,000.00</td>
</tr>
</tbody>
</table>
References


Appendix A  Terms of Reference

SAFEGUARDS SPECIALIST

**Project:** Project for Achieving Performance in Public Financial Management (PAFiM) (P163131)

**Client:** Division of International Development Assistance (DIDA), Ministry of Finance

**Location:** Republic of Marshall Islands

**Duration:** 5 working days

**Expected date of Start:** 21 February 2018

1. **BACKGROUND**

The Government of RMI is seeking funding from the World Bank for the ‘Project for Achieving Performance in Public Financial Management’ (the Project). The Project will support improvement in systems, processes and procedures around budget formulation and execution covering internal controls, procurement, accounting and financial reporting. This will include building human resource capacity and strengthening human resource management functions in the Ministry of Finance and relevant departments. The project will contribute to strengthening the government’s capacity to manage public resources efficiently and effectively to deliver services. The project may involve the renovation of one or more Government buildings and/or the installation of terrestrial fibre-optic cables for increased connectivity. The actual investments and locations will be determined during project implementation.

Based on a safeguards screening, the Project is a Category B and requires an Environmental and Social Management Plan (ESMP). The ESMP needs to be prepared and disclosed prior to Project Appraisal.

Involuntary land acquisition and resettlement is not anticipated and a resettlement instrument is not required.

2. **OBJECTIVES OF THE ASSIGNMENT**

The Government is seeking to hire a Safeguards Specialist to prepare the ESMP in accordance with World Bank safeguards policies. It is expected that the ESMP would cover the proposed investment typologies described above (renovations and terrestrial fibre installation), and the key

1) Complete the screening of the potential environmental and social impacts, such as:
   a. Potential for asbestos in demolition materials.
   b. Safe management and disposal of all construction and demolition waste.
   c. Health and safety risks.
   d. Avoiding involuntary land acquisition and resettlement issues from cable trenching.

2) Prepare practical mitigation tools and procedures in the ESMP. These should include (but not limited to):
   a. Asbestos Protocol
   b. Code of Practice for construction and demolition waste
   c. Instructions for bidding documents
d. Environmental, Health and Safety clauses for contractor bid documents

e. Protocols for identifying fibre optic cable routes that avoid private property.

f. Voluntary land lease or easement process.

g. Grievance Redress Mechanism, based on similar GRM already in place in RMI.

h. Consultation Plan (how to identify project affected people, consultation methods, etc.).

3) In the ESMP, also describe the project and implementation arrangements for safeguards, provide a budget for implementation and, if necessary, a capacity building plan.

4) Support DIDA to consult with stakeholders and disclose the ESMP.

5) Separate to the ESMP, prepare the safeguards section of the Project Operations Manual, operationalising the ESMP requirements into project management procedures.

3. **DELIVERABLES**

   - Draft ESMP in conformity with World Bank safeguards policies and this TOR – February 27, 2018 for DIDA and WB review and feedback
   - Final ESMP – March 02, 2018 (for RMI and WB disclosure)
   - Project Operation Manual: safeguards section – March 30, 2018

4. **REPORTING**

   The Safeguards Specialist will be engaged by DIDA and will also work in close liaison with the World Bank safeguard specialists. The Consultant will perform his/her duties in his/her home office through email correspondence, telephone and other appropriate media. No site visits are required.

5. **QUALIFICATIONS AND EXPERIENCE REQUIREMENTS**

   1. A bachelor degree in resource management, environmental science, planning, environmental engineering, or similar.
   2. At least 3 years’ experience in the application of World Bank safeguard policies in the Pacific with specific knowledge on the preparation of Construction-related EHS clauses and small scale ESMP.
   3. At least 10 years’ experience in environmental assessment.
   4. Availability to complete the assignment within the required timeframe.
Appendix B  Health and Safety Management Plan Guideline

1. Objective

The objective of this Sub-plan is to provide guidance on the:

- key principles involved in ensuring the health and safety of workers and the community is protected;
- preparation of Health and Safety Sub-plans and associated Job Safety Analyses (JSA); and
- implementation of Health and Safety Sub-plans during project implementation.


2. Principles

Employers must take all reasonable practicable steps to protect the health and safety of workers and the community and provide and maintain a safe and healthy working environment. The following key principles are relevant to maintaining worker health and safety:

2.1 Identification and assessment of hazards

Each employer must establish and maintain effective methods for:

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

2.2 Management of identified hazards

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

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

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

2.3 Training and supervision
Each employer must take all reasonable practicable steps to provide to employees (in appropriate languages) the necessary information, instruction, training and supervision to protect each employee's health and to manage emergencies that might reasonably be expected to arise in the course of work. Training and supervision extends to the correct use of PPE and providing employees with appropriate incentives to use PPE.

2.4 General duty of employees

Each employee shall:

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

2.5 Protective clothing and equipment

Each employer shall:

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

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

3. Design

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

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

3.1 Job Safety Analysis

Job safety analysis (JSA) is a process involving the identification of potential health and safety hazards from a particular work activity and designing risk control measures to eliminate the hazards or reduce the risk to an acceptable level. JSAs must be undertaken for discrete project activities such that the risks can be readily identified and appropriate risk management measures designed.

This Guideline includes a template for a JSA that must be completed and included as an attachment to the Health and Safety Sub-plan.

4. Implementation

4.1 Documentation

A Health and Safety Plan must be prepared and approved prior to any works commencing on site. The H&S Plan must demonstrate the Contractor’s understanding of how to manage safety and a commitment to providing a workplace that enables all work activities to be carried out safely. The H&S Plan must detail reasonably practicable measures to eliminate or minimise risks to the health, safety and welfare of workers, contractors, visitors, and anyone else who may be affected by the operations. The H&S Plan must be prepared in accordance with the World Bank’s EH&S Guidelines and the relevant country health and safety legislation.

4.2 Training and Awareness

Provisions should be made to provide health and safety orientation training to all new employees to ensure they are apprised of the basic site rules of work at / on the site and of personal protection and preventing injury to fellow employees. Training should consist of basic hazard awareness, site-specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate.

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

4.3 Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems.
PPE is considered to be a last resort that is above and beyond the other facility controls and provides the worker with an extra level of personal protection. The table below presents general examples of occupational hazards and types of PPE available for different purposes. Recommended measures for use of PPE in the workplace include:

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

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

5. Monitoring

Occupational health and safety monitoring programs should verify the effectiveness of prevention and control strategies. The selected indicators should be representative of the most significant occupational,
health, and safety hazards, and the implementation of prevention and control strategies. The occupational health and safety monitoring program should include:

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

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

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

- **Training**: Training activities for employees and visitors should be adequately monitored and documented (curriculum, duration, and participants). Emergency exercises, including fire drills, should be documented adequately.

- **Accidents and Diseases monitoring**: The employer should establish procedures and systems for reporting and recording:
  - Occupational accidents and diseases
  - Dangerous occurrences and incidents
These systems should enable workers to report immediately to their immediate supervisor any situation they believe presents a serious danger to life or health.

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

- Establish what happened
- Determine the cause of what happened
- Identify measures necessary to prevent a recurrence
## Job Safety Analysis (JSA)

### Business details

<table>
<thead>
<tr>
<th>Business name:</th>
<th>Contact person:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>Contact position:</td>
</tr>
<tr>
<td>Contact phone number</td>
<td>Contact email address:</td>
</tr>
</tbody>
</table>

### Job Safety Analysis details

<table>
<thead>
<tr>
<th>Work activity:</th>
<th>Location:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Who are involved in the activity:</td>
<td>This job analysis has been authorised by:</td>
</tr>
<tr>
<td>Plant and equipment used:</td>
<td>Name:</td>
</tr>
<tr>
<td>Maintenance checks required:</td>
<td>Position:</td>
</tr>
<tr>
<td>Tools used:</td>
<td>Signature:</td>
</tr>
<tr>
<td>Materials used:</td>
<td>Date:</td>
</tr>
<tr>
<td>Personal protective equipment:</td>
<td></td>
</tr>
<tr>
<td>Certificates, permits and/approvals required</td>
<td></td>
</tr>
<tr>
<td>Relevant legislation, codes, standard MSDSs etc applicable to this activity</td>
<td></td>
</tr>
</tbody>
</table>
Risk Assessment

**Use the risk rating table to assess the level of risk for each job step.**

<table>
<thead>
<tr>
<th>Consequence</th>
<th>Likelihood 1</th>
<th>Likelihood 2</th>
<th>Likelihood 3</th>
<th>Likelihood 4</th>
<th>Likelihood 5</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Rare: The event may occur in exceptional circumstances</td>
<td>Unlikely: The event could occur sometimes</td>
<td>Moderate: The event should occur sometimes</td>
<td>Likely: The event will probably occur in most circumstances</td>
<td>Almost Certain: The event is expected to occur in most circumstances</td>
</tr>
<tr>
<td>1</td>
<td>Insignificant: No injuries or health issues</td>
<td>LOW</td>
<td>LOW</td>
<td>LOW</td>
<td>MODERATE</td>
</tr>
<tr>
<td>2</td>
<td>Minor: First aid treatment</td>
<td>LOW</td>
<td>LOW</td>
<td>MODERATE</td>
<td>MODERATE</td>
</tr>
<tr>
<td>3</td>
<td>Moderate: Medical treatment, potential LTI</td>
<td>LOW</td>
<td>MODERATE</td>
<td>HIGH</td>
<td>HIGH</td>
</tr>
<tr>
<td>4</td>
<td>Major: Permanent disability or disease</td>
<td>LOW</td>
<td>MODERATE</td>
<td>HIGH</td>
<td>CRITICAL</td>
</tr>
<tr>
<td>5</td>
<td>Extreme: Death</td>
<td>MODERATE</td>
<td>HIGH</td>
<td>CRITICAL</td>
<td>CATASTROPHIC</td>
</tr>
</tbody>
</table>

Risk rating:

- **Low risk:** Acceptable risk and no further action required as long as risk has been minimised as possible. Risk needs to be reviewed periodically.
- **Moderate risk:** Tolerable with further action required to minimise risk. Risk needs to be reviewed periodically.
- **High risk:** Tolerable with further action required to minimise risk. Risk needs to be reviewed continuously.
- **Critical risk:** Unacceptable risk and further action required immediately to minimise risk.
- **Catastrophic:** Unacceptable risk and urgent action required to minimise risk.
Risk controls

The hierarchy of control can be used as an effective tool to deal with health and safety issues at work. Use the type of control suggested as measures to deal with the hazard. Aim to use control measures from as high on the hierarchy of control list as possible. If that is not possible the next option down the list or a combination of the measures should be implemented. The least effective control measure is the use of personal protective equipment (PPE) and it should be used as a last resort or a support to other control measures. Information and training should be integrated with all levels of control to explain how controls work.

1. **Eliminate** – if it is possible, the hazard should be removed completely. For example, get rid of dangerous machines.

2. **Substitute** – replace something that produces the hazard with something that does not produce a hazard. For example, replacing solvent based paint with water based paint. Risk assessment on the substitution must be conducted to ensure that it will not pose another hazard.

3. **Engineering control** – isolate a person from the hazard by creating physical barrier or making changes to process, equipment or plant to reduce the hazard. For example, install ventilation systems.

4. **Administrative control** – change the way a person works by establishing policies and procedures to minimise the risks. For example, job scheduling to limit exposure and posting hazard signs.

5. Use **personal protective equipment** (PPE) – protect a person from the hazard by wearing PPE. For example, wearing gloves, safety glasses, hard hats and high-visibility clothing. PPE must be correctly fitted, used and maintained to provide protection.
# JSA – Action steps

<table>
<thead>
<tr>
<th>Step No</th>
<th>Job step details</th>
<th>Potential hazards</th>
<th>Risk rating**</th>
<th>How to control risks***</th>
<th>Name of persons responsible for work</th>
</tr>
</thead>
<tbody>
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Review number: | Version: | Review number: | Version:
This job safety analysis has been developed through consultation with our employees and has been read, understood and signed by all employees undertaking the works:

<table>
<thead>
<tr>
<th>Print Names:</th>
<th>Signatures:</th>
<th>Dates:</th>
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</thead>
<tbody>
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Review No | 01 | 02 | 03 | 04 | 05 | 06 | 07 | 08
---|-----|-----|-----|-----|-----|-----|-----|-----
Initial: 
Date: 

______________________________________________________________________________________________________________________
Appendix C  Risk Assessment Methodology

STEP 1

Assign a rating and score for each of the three criteria (A-C) listed in the table below, and then add the scores to determine the consequence rating for an impact.

<table>
<thead>
<tr>
<th>RATING</th>
<th>DEFINITION OF RATING</th>
<th>SCORE</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Extent – the area over which the impact will be experienced</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Local</td>
<td>Confined to the project site or study area</td>
<td>1</td>
</tr>
<tr>
<td>Wider catchment or province</td>
<td>Extends beyond the project site to the wider, surrounding area.</td>
<td>2</td>
</tr>
<tr>
<td>Island or national</td>
<td>Extends to the whole island or nation.</td>
<td>3</td>
</tr>
<tr>
<td>Regional or global</td>
<td>Extends to the Pacific region and potentially beyond.</td>
<td>4</td>
</tr>
<tr>
<td>B. Intensity – the magnitude of the impact i.e. whether the impact will result in minor, moderate or major environmental, economic and social (including human health) changes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Low</td>
<td>Minor or negligible changes, disturbances, damages, injuries or health effects. Likely to generate minimal interest or concern amongst the local community/stakeholders. Examples: dust and exhaust gases from construction machinery; temporary or single exceedance of a pollution limit or threshold; first aid cases; minor discomfort or irritation from construction noise; increased traffic on local roads to transport construction materials to a project site.</td>
<td>1</td>
</tr>
<tr>
<td>Medium</td>
<td>Moderate changes, disturbances, damages, injuries or health effects. Likely to generate more prolonged interest or concern amongst local community/stakeholders. Examples: generation of hazardous waste; large fish kill incident; frequent exceedance of a pollution limit or threshold; clearance of village food gardens; influx of workers from overseas for project construction; moderate disruption of daily life/work activities within a village; intermittent production of foul odour near a village; infrastructure damage from flooding or strong winds.</td>
<td>2</td>
</tr>
<tr>
<td>High</td>
<td>Major or severe changes, disturbances, damages, injuries or health effects. Likely to generate widespread and intense interest or controversy amongst local, national and regional communities/ stakeholders. Examples: clearance of endangered species habitat; drawdown of limited groundwater supplies; large increase in suspended sediment levels from dredging; destruction of cultural artefacts; forced relocation of village settlements; permanent disabilities or fatalities; loss of coastal buildings and infrastructure due to extreme weather events.</td>
<td>3</td>
</tr>
<tr>
<td>C. Duration – the timeframe over which the impact will be experienced and its reversibility</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Short-term</td>
<td>Up to 2 years – impact is reversible or limited to when particular development activities or environmental events are taking place. Remediation or recovery is possible.</td>
<td>1</td>
</tr>
<tr>
<td>Medium-term</td>
<td>2 to 15 years – impact is reversible or limited to when particular development activities or environmental events are taking place. Remediation or recovery is possible.</td>
<td>2</td>
</tr>
</tbody>
</table>
Long-term | More than 15 years – impact is permanent or gradually reversible with sustained remediation and recovery efforts. | 3

The combined score of the three criteria (extent, intensity, duration) corresponds to a consequence rating, as follows:

<table>
<thead>
<tr>
<th>Combined score (A+B+C)</th>
<th>3 – 4</th>
<th>5 – 6</th>
<th>7 – 8</th>
<th>9 – 10</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consequence rating</td>
<td>Minor</td>
<td>Moderate</td>
<td>Major</td>
<td>Massive</td>
</tr>
</tbody>
</table>

**STEP 2**

Assess the *probability* of the impact occurring according to the following definitions:

<table>
<thead>
<tr>
<th>Probability – the likelihood of the impact occurring</th>
<th>Improbable</th>
<th>Possible</th>
<th>Probable</th>
<th>Highly probable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unlikely to occur during project lifetime. &lt; 20% chance of occurring</td>
<td>Improbable</td>
<td>Possible</td>
<td>Probable</td>
<td>Highly probable</td>
</tr>
<tr>
<td>May occur during project lifetime. 20%–60% chance of occurring</td>
<td>Possible</td>
<td>Probable</td>
<td>Highly probable</td>
<td></td>
</tr>
<tr>
<td>Likely to occur during project lifetime. &gt; 60%–90% chance of occurring</td>
<td>Probable</td>
<td>Highly probable</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Highly likely to occur, or likely to occur more than once during project lifetime. &gt; 90% chance of occurring</td>
<td>Highly probable</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**STEP 3**

Determine the overall *significance* of the impact as a combination of the *consequence* and *probability* ratings, as set out in the matrix below:

<table>
<thead>
<tr>
<th>CONSEQUENCE OF IMPACT</th>
<th>PROBABILITY OF OCCURRENCE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minor</td>
<td>Improbable</td>
</tr>
<tr>
<td></td>
<td>VERY LOW</td>
</tr>
<tr>
<td>Moderate</td>
<td>Low</td>
</tr>
<tr>
<td>Major</td>
<td>MEDIUM</td>
</tr>
<tr>
<td>Massive</td>
<td>HIGH</td>
</tr>
</tbody>
</table>

**STEP 4**

State the level of *confidence* in the assessment of the impact as high, medium or low. The level of confidence will depend on the extent and type of information available, whether it is qualitative or...
quantitative, and whether it is based on direct measurements, extrapolated data, estimations or expert opinion.

**STEP 5**

5(a) – identify and describe practical mitigation measures that can be effectively implemented to reduce the impact.

5(b) – assume mitigation measures have been implemented and reassess the impact, by following steps 1 to 4 again. The point of the second assessment is to examine how impact extent, intensity, duration and/or probability are likely to change, after mitigation measures have been put in place.

**STEP 6**

Summarise all the impact assessment ratings in a single table that can be included in the executive summary or concluding section of an EIA report.