

Solomon Islands and World Bank

Community Access and Urban Services  
Enhancement Project (CAUSE)

# **Environment and Social Management Guidelines**

December 2017

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## Acronyms and Abbreviations

<b>ADB</b>	Asian Development Bank
<b>BP</b>	Bank Procedures
<b>CAUSE</b>	Community Access and Urban Services Enhancement Project
<b>CCF</b>	Community Consultation Framework
<b>CDO</b>	Community Development Officer
<b>CLO</b>	Community Liaison Officer
<b>COL</b>	Commissioner of Lands
<b>CSP</b>	Community Sector Project
<b>DFAT</b>	Department of Foreign Affairs and Trade
<b>DMSTP</b>	Domestic Maritime Sector and Technical Support Program
<b>EA</b>	Environmental Assessment
<b>EAs</b>	Executing Agencies
<b>ECD</b>	Environment and Conservation Division (MECM)
<b>EM</b>	Ethnic Minority
<b>ESA</b>	Environmental and Social Assessment
<b>ESF</b>	World Bank Environmental and Social Framework (2017)
<b>ESMF</b>	Environmental and Social Management Framework
<b>ESMG</b>	Environment and Social Management Guidelines
<b>ESMP</b>	Environmental and Social Management Plan
<b>ESS</b>	Environmental and Social Safeguards
<b>FGD</b>	Focus Group Discussion
<b>GL</b>	Group Leader
<b>GP</b>	Guadalcanal Province
<b>GPG</b>	Guadalcanal Provincial Government
<b>GRM</b>	Grievance Redress Mechanism
<b>GRS</b>	Grievance Redress System
<b>HCC</b>	Honiara City Council
<b>IDA</b>	International Development Association
<b>IOL</b>	Inventory of Losses
<b>IP</b>	Indigenous People
<b>ISDT</b>	Infrastructure and Service Delivery Training
<b>LAPF</b>	Land Acquisition Policy Framework
<b>LBES</b>	Labor-based equipment support
<b>MDPAC</b>	Ministry of Development Planning and Aid Coordination
<b>MECM</b>	Ministry of Environment, Conservation and Meteorology
<b>M&amp;E</b>	Monitoring and Evaluation
<b>MHA</b>	Ministry of Home Affairs
<b>MID</b>	Ministry of Infrastructure and Development
<b>MLHS</b>	Ministry of Lands, Housing and Survey
<b>MOFT</b>	Ministry of Finance and Treasury
<b>MOU</b>	Memorandum of Understanding
<b>MP</b>	Malaita Province
<b>MPA</b>	Malaita Provincial Authority
<b>MPGIS</b>	Provincial Government and Institutional Strengthening
<b>NDS</b>	National Development Strategy
<b>NGO</b>	Non-Government Organization
<b>NTP</b>	National Transport Plan
<b>OH&amp;S</b>	Occupational Health and Safety
<b>OP</b>	Operational Policy
<b>PAP</b>	Project Affected Person
<b>PET</b>	Pre-Employment Training
<b>PG</b>	Provincial Government

<b>PGDO</b>	Provincial Government Designated Officer
<b>PIU</b>	Project Implementation Unit
<b>PM</b>	Project Managers
<b>PMCBU</b>	Project Management and Capacity Building Project (within MID for SIRIP)
<b>PMU</b>	Project Management Unit
<b>PSC</b>	Project Steering Committee
<b>REP</b>	Rapid Employment Project
<b>ROW</b>	Right-of-way
<b>RP</b>	Resettlement Plan
<b>RPF</b>	Resettlement Policy Framework
<b>SA</b>	Social Assessment
<b>SIG</b>	Solomon Islands Government
<b>TC</b>	Technical Committee
<b>TOL</b>	Temporary Occupancy Licenses
<b>TPPD</b>	Transport Policy and Planning Division (MID)
<b>WB</b>	World Bank
<b>WP</b>	Western Province
<b>WPA</b>	Western Provincial Authority

## Executive Summary

In 2009, Solomon Islands Government (SIG) requested that the World Bank set up emergency operations to directly contribute to conflict and poverty-affected households following civil conflict, high levels of migration into the capital Honiara, the resultant strain on infrastructure and resources and the proliferation of social unrest and unemployment rates in Honiara and surrounds. The Rapid Employment Project (REP) was designed to provide a responsive and appropriate safety net mechanism targeting the poor and the vulnerable populations in and around Honiara.

The components of REP supported a labor-based urban services model, with associated training, to address the inter-related issues of unemployment, poverty and civil conflict, with particular attention to their effects on women and young people. The concept was to deliver a rapid response, simple project that would provide short term income for poor households and contribute to building work ready skills and attitudes. The training and work practices were designed in a way to address gender inequity; health, safety and security issues and provide a positive process for engagement of young people and women in delivery of urban services.

The REP has performed well and is scheduled to complete implementation in Honiara in December 2018. Due to its success and ongoing demand from key stakeholders, the SIG requested that the World Bank (the Bank) prepare a second phase of the project. The second phase of REP, titled **Community Access and Urban Services Enhancement Project (CAUSE)** aims to expand from REP's project area located in Honiara to include multiple regions including the remainder of Guadalcanal Province, and the townships of Gizo, Noro and Munda (Western Province) and Auki (Malaita Province).

The new project will build upon the current REP's proven capabilities in: (a) the construction of community access infrastructure to enhance connectivity to basic social and economic services; (b) delivering waste management activities; (c) maintaining and improving secondary and tertiary roads; and (d) providing basic work-related training opportunities to participants carrying out labor based activities. In doing so, the project will reflect key lessons from the REP. The project will continue to work in Honiara and will also extend to urban areas in three provinces: Guadalcanal, adjacent of Honiara; Western Province covering the townships of Gizo, Munda and Noro; and Malaita Province covering the township of Auki.

As part of the design and implementation of all World Bank projects, procedures for community engagement and safeguards management are required. These procedures assist project management and implementation units to deliver the project in a way that is legally, socially and environmentally appropriate. Assessments and guidelines are needed to identify and mitigate potential risks and to contribute to optimizing project benefits. For this reason, an environmental and social assessment was undertaken in preparation for the proposed CAUSE project and comprised (i) a review of available secondary information; (ii) field visits to each Province including stakeholder interviews; (iii) analysis of primary and secondary data; and (iv) preparation of outputs including a social assessment report and this report, the updated Environment and Social Management Guidelines (ESMG) including a community consultation framework. A separate social assessment report is provided as Attachment 1 to this ESGM report.

## Overview

This document is the Environmental and Social Management Guidelines (ESMG) for the World Bank and Solomon Islands Community Access and Urban Services Enhancement Project (CAUSE). The report is made up of seven sections:

1. **Introduction** describing the CAUSE project's components, institutional and financing arrangements; and describes the purpose, scope and methodology for this ESGM;
2. Brief description of the **current baseline context and the potential institutional, environmental and social benefits and risks** of the project; this section should be read in conjunction with the social and environmental assessment prepared as background to these guidelines.
3. **Policy and regulatory framework** for CAUSE, which outlines the World Bank safeguards policies triggered;
4. **Environment and Social management Framework (ESMF)** which includes the overall approach for ensuring that project benefits are realized and risks are mitigated in line with World Bank Safeguard Operational Policies and that form the basis for the CAUSE ESGM;
5. The **community consultation framework** which outlines guidelines for public disclosure and engagement in project preparation and implementation;
6. **Grievance redress mechanism** proposed for management of grievances that may arise during implementation; and
7. **ESMG Monitoring and evaluation** which outlines the requirements and responsibilities for ensuring that the ESMF, Community Consultation Framework (CCF) and Grievance Redress Mechanism (GRM) are implemented appropriately throughout the project duration.

## 1. Introduction

In 2009, Solomon Islands Government (SIG) requested that the World Bank set up emergency operations to directly contribute to conflict and poverty-affected households following civil conflict, high levels of migration into the capital Honiara, the resultant strain on infrastructure and resources and the proliferation of social unrest and unemployment rates in Honiara and surrounds. The Rapid Employment Project (REP) was designed to provide a responsive and appropriate safety net mechanism targeting the poor and the vulnerable populations in and around Honiara. The components of REP supported a labor-based urban services model, with associated training, to address the inter-related issues of unemployment, poverty and civil conflict, with particular attention to their effects on women and young people.

The REP has performed well and is scheduled to complete implementation in Honiara in December 2018. Due to its success and ongoing demand from key stakeholders, the SIG requested that the World Bank (the Bank) prepare a second phase of the project. The second phase of REP, titled **Community Access and Urban Services Enhancement Project (CAUSE)** aims to build on the successes of REP and expand from Honiara to also include urban areas in Guadalcanal Province adjacent to Honiara, and the townships of Gizo, Noro and Munda (Western Province) and Auki (Malaita Province).

## Description of the Proposed Project

**CAUSE Objectives and Components** The CAUSE project's development objectives are to "improve socio-economic opportunities and conditions for vulnerable, urban populations through the delivery of basic infrastructure and services."<sup>1</sup> Building on REP's three components, CAUSE will have three program components and one administrative component:

**Component 1: Urban Works and Services (US\$6.4 million)**, executed by Honiara City Council (HCC) in coordination with the Guadalcanal Provincial (GP), Malaita Provincial (MP) and Western Provincial (WP) governments, will prioritize the delivery of a range of basic infrastructure and services in the waste management and transport sectors implemented by local community groups and contractors through sub-grants and contracts. This will generate an estimated total of 218,409 labor days. It will consist of two sub-components:

- i. *Community-Access Infrastructure* which will focus on enhancing community access and strengthening connectivity to transport links to basic social and economic services. Examples of infrastructure include concrete steps (Jacob's Ladders), footpaths, small bridges, swamp crossings, and drainage improvements. Typically, each group will be comprised of about 20 people carrying out infrastructure works over an estimated 30-day period; and
- ii. *Waste Management Services* will focus on the collection, recycling and increasing awareness on waste as well as ensuring that the garbage collected under the project is well integrated with other back-end services supported by the provincial authorities, such as the transportation and land filling of waste. Community Groups engaged under task-based contracts will cover defined geographic areas and tasks tailored to the needs of each urban center. Typically, each group will be comprised of about six people carrying out waste management over a 30-day period.

**Component 2: Road Repair and Maintenance (US\$5.5 million)**, executed by the Ministry of Infrastructure and Development (MID) in coordination with the GP, MP and WP governments, will deliver civil works contracts in road maintenance, improvement and drainage provision, implemented by small to medium sized contractors. This is expected to generate around 44,589 labor days. It will consist of two sub-components:

- i. *Routine Road Maintenance*, which will deliver 21 road maintenance contracts that have been identified under the NTP, which gives priority to periodic maintenance of the existing road network over constructing new roads. The purpose of routine maintenance is to prolong the life-span of the road. The work will involve reshaping of the road embankment and wearing course, spot re-graveling, repair of culverts and wing walls, and routine maintenance such as patching, potholing, cleaning and cleaning of the drainage system.; and
- ii. *Road Improvement and Rehabilitation*, which will deliver four road improvement contracts to tertiary and secondary road sections that have been damaged by severe weather events and are no longer in maintainable condition; and two drainage contracts. The work will involve increasing the number and capacity of drainage structures both along (side drains) and across the road, with cross water structures such as culverts. Where possible, the project will use labor-based work methods supplemented by machine based technology.

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<sup>1</sup> Solomon Islands/World Bank Community Access and Urban Services Enhancement (CAUSE) Project. Preparation Mission July 17-27, 2017. *Draft Aide-Mémoire*.

**Component 3: Infrastructure and Service Delivery Training (ISDT) (US\$1.4 million)** will be implemented by HCC in coordination with the GPG; MPA and WPA, building on the capacity developed during the latter half of REP to implement its activities directly, using a combination of PMU staff, and contracted trainers. ISDT will provide skills training opportunities for individuals and contractors and strengthen their knowledge and capacity to understand the project's procedures; and access project benefits directly linked to labor-based activities funded by the project. As a pre-requisite for work, the training will build upon the REP's Pre-Employment Training (PET) and include: basic life skills; occupational health and safety (OH&S); basic financial literacy; improve the knowledge and skills of beneficiaries regarding labor-based construction and service delivery methods as well as contracting and payment arrangements. Additional modules may only apply to contractor staff and community groups that aim to take up contracting. In addition, the ISDT will collect socio-economic data as part of its registration process; set up bank accounts for beneficiaries; include counseling and referral services to other social intermediaries; and provide stipends for bus fare and lunch. Responding to feedback from participants as well as trainers involved in the PET, the ISDT will include two additional days of training, to allow time for absorption of more complex topics. Based on current estimates, around 5,300 participants will be trained over four years, including around 2,300 in the provinces over a minimum training period of seven days.

**Component 4: Project Management (US\$1.7 million)** will finance project management support, including safeguards oversight, communications & media support, short-term technical help, training, financial management and procurement, and extra project staff, goods, and operating costs. As implementing agencies, HCC and MID will form Project Management Units (PMUs) responsible for their parts of the project. Like the REP, the PMUs will be housed in a joint project office in Honiara. Small, Project Implementation Units (PIUs), essentially satellite offices to the PMU office in Honiara, will be setup under the Office of the Provincial Secretary to support project delivery in Western and Malaita Provinces. The joint PMU will continue supporting HCC, Guadalcanal Province, and MID project delivery in and around Honiara. As part of the project's impact evaluation, baseline, and follow-up surveys of communities in project impact areas, beneficiaries, and contractors, will be carried out to measure key result indicators.

### **Project Financing**

CAUSE will be financed as a Specific Investment Loan with a US\$15 million International Development Association (IDA) Grant. A four-year implementation period is proposed, from 2018 to 2022. The project has been approved for processing under Paragraph 12 of OP10.00, which allows for the use of condensed procedures including: proceeding to the Decision Meeting following the Appraisal Mission; and authorizing Negotiations after a consolidated review of the Negotiations Package.

CAUSE will apply similar fiduciary arrangements and implementation mechanisms as REP; and focus on key areas, including the transport and waste management sectors, which have been identified as priorities for Honiara and the provincial authorities<sup>2</sup> and targeting vulnerable urban communities, especially women and youth. Building on REP's proven track-record, the project will: (a) construct access infrastructure to connect community to basic social and economic services; (b) deliver waste management services; (c) maintain and improve secondary and tertiary roads; and (d) provide skills training to beneficiaries carrying out labor based activities.

The financing for safeguard processes will be incorporated within the project budget, apart from any negotiations for land/asset acquisition processes which will be covered through the budget of the respective executing agency.

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<sup>2</sup> UNHABITAT, 2012. Solomon Islands: Honiara Urban Profile; Auki Urban Profile, Gizo Urban Profile.



## **Executing Agencies**

The main counterparts for the project are the HCC and MID. Both agencies have shown continued strong commitment to the REP approach. The PMU has maintained formal linkages with HCC officials, and has been effective at integrating REP's and HCC's activities. Similarly, the PMU has forged strong relationships with senior managers in MID and integrated its activities, especially in planning maintenance and rehabilitation works, with those of MID. Given this history, and the similarity in types of activities proposed, these two agencies remain logical choices as implementing agencies for the CAUSE project.

**Guadalcanal Province.** REP commenced pilot activities within peri-urban areas of Guadalcanal Province, a forerunner to expanding to other provinces in the CAUSE project. Commitment of the GPA has been strong. Under a Memorandum of Understanding (MoU), entered by HCC and GPA, project funds are spent on activities in Guadalcanal without changes to fiduciary and funds flow arrangements. HCC continues to hold and operate the designated account through the PMU which provides a simple, existing and cost-effective accountability and management mechanism for the CAUSE Project. Similar arrangements were deemed to be acceptable by the Western and Malaita Provincial Governments during the consultation process for these ESMG, although detailed discussion will be required prior to signing of the MOU for each PG.

**Western and Malaita Provinces.** The PMU will be supported by small PIUs in each province providing day-to-day oversight. The project office in Honiara will provide technical inputs, and overall financial and management supervision. Relevant PMU staff will travel to the provinces as needed. MPGIS, to whom provincial governments formally report, will support the project as a member of the Project Steering Committee (PSC).

HCC and MID are responsible for the performance of their relevant components and subcomponents. However, funds and resources will need to be shared amongst the implementing agencies and provinces. A Technical Committee (TC) comprised of the PMUs and PIUs will meet regularly, coordinating planning, works and services, community engagement, safeguards compliance, budgeting, and monitoring activities. The GPA, MPA and WPA will coordinate with HCC, MID and their respective town councils (where established) when selecting and implementing subprojects.

In addition, a PSC will oversee overall performance of the project. The PSC will promote high-level coordination between the agencies involved in the project, provide policy guidance, and give feedback on work plans and budgets. The PSC will include representatives from Ministries of Finance and Treasury (MoFT), Development Planning and Aid Coordination (MDPAC), Infrastructure Development (MPGIS), Provincial Government and Institutional Strengthening (MPGIS), Home Affairs (MHA), and HCC. Potentially, a representative from a development partner supporting the project may be a member. Meeting on a semi-annual basis, the PSC Chair will alternate between the Permanent Secretaries for MID and the HCC City Clerk. Terms of Reference for the PSC and TC will be finalized and documented in the Project Operations Manual as conditions of disbursement for the works contracts and sub-grant categories.

## **Project Implementing Units (PIU)**

PIU offices will be established in Auki and Gizo. The Gizo PIU will also service Noro and Munda. PIUs will typically include a works supervisor, a community liaison officer, and an administration/finance officer responsible for supervising and certifying works; monitoring and supporting training and outreach.

## **Purpose and Scope of the Environmental & Social Management Guidelines**

The **purpose** of the ESMG is to ensure that the proposed investments implemented through the project comply with the existing laws, regulations and standards in Solomon Islands as well as with the World Bank's Operation Policies and Practices, and will not have a lasting adverse impact on the environment, community and livelihoods. The ESMG provides guidance to ensure that the selection, design and implementation of specific activities under the project are participatory and inclusive and reflect local context. It also outlines necessary support mechanisms needed to ensure that the activities financed under CAUSE are well designed and implemented.

The **scope** of the ESMG covers project implementation as a whole, addressing each of the four components for the duration of project implementation.

**Guiding principles** applied to the development and implementation of this ESMG are:

- **Equitable** – The ESMG should ensure that the participation in the project and the benefits that are generated are equitable in their distribution. Equity includes appropriate distribution among gender, age groups, tribal/cultural groups, and geographic locations.
- **Transparent** – Project objectives, activities and requirements/processes need to be fair and transparent, with communication among stakeholders and to the public having clear and consistent messages. For example, this means that the project selection criteria, priorities, processes, rules and expectations need to be clearly stated, widely communicated and strictly adhered to so that there is a common understanding of project requirements and sense of fairness.
- **Realistic** – The ESMG and the project are implemented within the constraints of available project and partner resources and capacity. Thus, they need to be realistic to what can be achieved within scope, and manage expectations of agencies and communities in the project areas as to what can be achieved.
- **Context-specific** – The ESMG and project acknowledge that the local context is different in each of the project locations, and that the project needs to be responsive to the context in each location. This principle also acknowledges that the social, institutional and environmental contexts are not static, and that important changes will need to be responded to during implementation.
- **Participatory** – Relevant local agencies and communities need to be actively involved in project preparation and implementation and viewed as key partners for the project. Implementing this principle is expected to contribute positively to ensure that all other principles are successfully implemented.
- **Sustainable** – All efforts must be taken throughout to ensure that benefits and risk mitigations will be sustained over time, including beyond the project funding period.

**ESMG implementation arrangement and institutional responsibilities** Each of the agencies involved in the preparation and implementation of CAUSE will have some responsibility for implementing the measures outlined in this ESMG. This includes handling the environment and social safeguards (ESS), CCF, GRM, and monitoring and evaluation of the ESMG. These specific responsibilities are outlined in the respective Appendices for specific management actions.

## Methodology

The preparation of this ESMG has involved reviewing and updating the ESMG for REP, informed by an environmental and social assessment (ESA). The ESA was conducted throughout August and September 2017 and comprised:

- (i) a review of available secondary information;
- (ii) field visits to each of the project locations to conduct stakeholder interviews and community focus group discussions;
- (iii) analysis of primary and secondary data including the previous ESMG, REP Documentation and previous community consultation records, demographic and urban development data and reports, and situation analyses of Solomon Islands by World Bank and other development partners;
- (iv) preparation of outputs including this social assessment report and this ESMG; and
- (v) A one-day public consultation on the draft social assessment and ESMG held in Honiara in October 2017.

A Social and Environmental Assessment report provides a more detailed summary of the secondary and primary data gathered as part of the baseline for these guidelines. The ESMG and the Social Assessment, both finalized in October 2017, together constitute the framework-level safeguard instruments for the project.

## 2. Baseline Condition, Potential Benefits and Risks

The potential benefits of the CAUSE project to the Solomon Islands is, in line with the stated objectives to generate skills, income and employment opportunities for project participants. In addition, the project will contribute physical infrastructure improvements and urban services to the targeted communities. In addition, wider benefits are expected to be achieved in terms of improved amenity within the project areas and capacity development for participating institutions.

The social and environmental assessment identified a number of institutional, social and environmental risks that will require mitigation. The main social risks relate to (i) ineffective inclusion/elite capture; (ii) unfulfilled expectations; (iii) social diversity/inequality between participants; and (iv) possible disputes, as well as safety at work is and gender based concerns. The main environmental risks relate to (i) works in environmentally sensitive areas; and (ii) climatic risks and natural disasters. The main risks institutional risks relate to (i) political risks; (ii) alignment risks; (iii) communication risks; (iv) and governance/financial risks in relation to procurement.

In addition to these safeguard impacts and risks, the findings of the assessment were that open, transparent and frequent communication will underpin risk management and mitigation for the project process. Specific actions will be required to enhance benefits and mitigate risks. Proper management of these risks will ensure equity and inclusion in line with the principles outline in section 1. Details of baseline conditions, benefits and risks are addressed in the social and environmental assessment.

## 3. Policy and Regulatory Framework

The Bank has a series of Operational Policies (OP) and Bank Procedures (BP) relating to environmental and social safeguards (ESS) which outline that project designs are to be informed by appropriate environmental and social assessments.<sup>3</sup> The current policies and

<sup>3</sup> World Bank (2005). Environmental and Social Safeguards Policies. <http://www.worldbank.org/en/programs/environmental-and-social-policies-for-projects/brief/environmental-and-social-safeguards-policies>

procedures for ESS are summarized in Table 1, which highlights those that have been triggered and the relevance of the respective safeguard policy for CAUSE. The table shows that there are five policies that are triggered (4.01, 4.04, 4.10, 4.11 and 4.12) for CAUSE and therefore need to be addressed in this assessment. It is important to note that while these safeguards are triggered, there is likely to be minimal actual work involved because the project will cover only very minor works. Therefore, the triggering of safeguards is largely precautionary in nature.

It is worth noting that the Bank has recently approved a new Environmental and Social Framework (ESF), which will be progressively rolled out from 2018.<sup>4</sup> As such, this project will follow the existing policies and procedures, though consideration of alignment to the new framework has been made wherever feasible.

**Table 1. World Bank Policies & Procedures for Environmental & Social Safeguards.**

*Shaded items have been triggered for the project and are considered in this assessment.*

No.	Operational Policies	Bank Procedures	Relevance to CAUSE
	Piloting the Use of Borrower Systems to Address Environmental and Social Safeguard Issues in Bank-Supported Projects <ul style="list-style-type: none"> <li>Table A1 - Environmental and Social Safeguard Policies - Policy Objectives and Operational Principles</li> </ul>	Piloting the Use of Borrower Systems to Address Environmental and Social Safeguard Issues in Bank-Supported Projects	Not Applicable
4.01	<b>Environmental Assessment</b> <ul style="list-style-type: none"> <li>Annex A - Definitions</li> <li>Annex B - Content of an Environmental Assessment Report for a Category A Project</li> <li>Annex C - Environmental Management Plan</li> </ul>	<b>Environmental Assessment</b> <ul style="list-style-type: none"> <li>Annex A - Application of EA to Dam and Reservoir Projects</li> <li>Annex B - Application of EA to Projects Involving Pest Management</li> </ul>	Category B – Minor works only
	Environmental Action Plans	Environmental Action Plans	Not Applicable
	Performance Standards for Private Sector Activities	Performance Standards for Private Sector Activities	Not Applicable
4.04	<b>Natural Habitats</b> <ul style="list-style-type: none"> <li>Annex A - Definitions</li> </ul>	Natural Habitats	Unlikely to be affected as works are on modified land; nonetheless, given minor potential of parklands/coastal work, this safeguard is triggered as a precautionary measure only.
4.09	Pest Management		Not Applicable
4.10	<b>Indigenous Peoples</b> <ul style="list-style-type: none"> <li>Annex A - Social Assessment</li> <li>Annex B - Indigenous Peoples Plan</li> <li>Annex C - Indigenous Peoples Planning Framework</li> </ul>	Indigenous Peoples Cultural Assessment	Majority project population are indigenous so assessment and planning are integral to overall project design
4.11	<b>Physical Cultural Resources</b>	Physical Cultural Resources	No major works, some enhancements (e.g. upgrading in town center)

<sup>4</sup> International Bank for Reconstruction and Development/The World Bank (2017). Environmental and Social Framework. <http://www.worldbank.org/en/programs/environmental-and-social-policies-for-projects/brief/the-environmental-and-social-framework-esf>

No.	Operational Policies	Bank Procedures	Relevance to CAUSE
			or foreshore areas) may be proposed, therefore this safeguard is triggered as a precautionary measure only.
4.12	<b>Involuntary Resettlement</b> <ul style="list-style-type: none"> <li>Annex A - Involuntary Resettlement Instructions</li> </ul>	Involuntary Resettlement	No involuntary resettlement expected. Minor land acquisition or asset loss may be affected in a few subprojects.
4.36	Forests <ul style="list-style-type: none"> <li>Annex A - Definitions</li> </ul>	Forests	Not Applicable
4.37	Safety of Dams	Safety of Dams Annex A - Dam Safety Reports: Content and Timing	Not Applicable
7.60	Projects in Disputed Areas	Projects in Disputed Areas	Not Applicable
7.50	Projects on International Waterways	Projects on International Waterways	Not Applicable

In addition to the ESS policies, OP 4.20 relating to Gender has also been considered in the social assessment. Also the BP17.50 is followed to ensure disclosure prior to appraisal.

## Environmental Assessment

This policy (4.01) is triggered at a Category B - minor and site-specific works level. This policy requires environmental assessment (EA) of projects to help ensure that they are environmentally sound and sustainable. Projects that will affect the environment (temporary or permanently) will be subject to EA. An important component of the policy is Annex C which deals with the requirements for an environmental and social management plan (ESMP) which consists of the set of mitigation, monitoring, and institutional measures to be taken during implementation and operation to eliminate adverse environmental and social impacts, offset them, or reduce them to acceptable levels. The plan also includes the actions needed to implement these measures. Most environmental impacts will be temporary (during works/activities) and can be managed effectively through implementation of an ESMP to be compiled from a series of ESMGs covering all anticipated project activities and works. Given that most of the impacts are likely to be social, the project will conduct a joint Environmental and Social Management plan.

The policy concludes that for many Category B projects (classification of the CAUSE), the range of EA instruments may be used. In this case, this document, the ESMG and the SA will serve as the project level EA documents, while simple ESMPs will be required to be prepared for subprojects under Components 1 and 2. Guidelines for preparation of an ESMP are provided in Appendix 1.

## Natural Habitats

This policy (4.04) is triggered as a precautionary measure for any (unlikely) proposed work in parks or if road reserves are widened. The conservation of natural habitats, like other measures that protect and enhance the environment, is essential for long-term sustainable development. The Bank therefore supports the protection, maintenance, and rehabilitation of natural habitats and their functions in its economic and sector work, project financing, and policy dialogue. The Bank supports, and expects borrowers to apply, a precautionary approach to natural resource management to ensure opportunities for environmentally sustainable development. Wherever feasible, Bank-financed projects are sited on lands already converted (excluding any lands that in the Bank's opinion were converted in

anticipation of the project). The Bank does not support projects involving the significant conversion of natural habitats. The SIG has approved legislation in 2010 and 2012 to protect natural habitat (see Appendix 2). As such, the consideration of natural habitat would be considered as an integral part of the ESMP process.

## **Indigenous Peoples**

The Indigenous Peoples Policy (4.10) is triggered due to the presence of Indigenous People; however, as the whole country comprises of predominantly Indigenous People, there is no likelihood of exclusion of IPs as a minority. Consequently, the project plan caters almost exclusively to Indigenous Peoples. This policy requires assessment of whether indigenous people (IP) including ethnic minority (EM) groups, as distinct from the dominant social/ethnic groups, will be more vulnerable to, or unable to fully participate in, and benefit from, a project. While all beneficiaries of the REP are indigenous to the Solomon Islands, they are not “indigenous” within the meaning of paragraph 4 of Operational Policy (OP) 4.10. The context of the project is urban (covering the most urbanized and populous area in the Solomon Islands) with a highly transient and migratory population. In preparing the project, the project will follow a careful process of targeting and selection to ensure equity of access and to address social risk (See Appendix 3)

Furthermore the minor and adverse effects of project activities will be managed through the implementation of the ESMP including the Land acquisition Policy Framework (LAPF), that also includes requirements to address any impact on assets. Community consultation will be a key strategy for ensuring that all communities are well-informed and have equitable access to project benefits. The communication plan strongly features processes for equity within the community, between tribes and to encourage full and equitable participation of the project’s key target groups, women and young people, through the various mechanisms included in the Consultation Plan, (see Appendix 6).

## **Physical and Cultural Resources**

This policy (4.11) is triggered as a precautionary measure for any (unlikely) proposed work in parks/ close to memorials or culturally important locations. To ensure that Physical Cultural Resources are identified and protected in World Bank financed projects and national laws governing the protection of physical cultural property are complied with, assessment of potentially significant cultural assets are considered as part of the ESMP. Such resources may include archaeological and historical sites, historic urban areas, sacred sites, graveyards, burial sites, unique natural values. These aspects will be considered as part of the Environmental Assessment and covered in the ESMP (See Appendix 1).

## **Involuntary Resettlement**

No human resettlement is expected to occur in this project; in fact any projects potentially requiring resettlement would not be approved. This safeguard policy is (OP 4.12) is nevertheless triggered for the rare occasion when sub-project works may result in the loss of minor assets (e.g. productive trees, vegetable plots, etc) to allow infrastructure to be installed.

The World Bank Land Acquisition Policy Framework (LAPF) as it applies to OP 4.12 covers the direct economic and social impacts that are caused by the involuntary taking of land resulting in (i) relocation or loss of shelter; (ii) loss of assets or access to assets; or (iii) loss of income sources or means of livelihood, whether or not the affected persons must move to another location; or the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on livelihoods.

The OP requires that an assessment is made of the likely social impacts of projects, particularly as they entail acquisition of land, relocation of people, loss of productive assets or access to services, both during the implementation and operational phases of project activities. The policy is intended to ensure that resettlement or land, resources and asset acquisition activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable the persons affected to share in project benefits, ensure that affected persons are meaningfully consulted and are provided, where possible, opportunities to participate in planning and implementation of project activities. In the Solomon Islands, there is a clear distinction in customary law between land ownership and asset ownership, even if the asset is situated on land with a differing ownership. If land or asset ownership issues are likely to arise or become difficult to resolve, the project would shift to alternative subproject priorities and options. This is possible under the project as the community priorities are numerous and the project has the flexibility to select from a range of options within the scope of the project, as long as they are not on the list of prohibited subprojects (Appendix 3 Annex 2).

Although no resettlement is expected to occur, some land or asset transfer may be required. These may need to be two distinct processes as the land or asset ownership may be different, even for the same sub-project. Therefore, for CAUSE, the transfer process will be called land/asset acquisition (LAA) and land/asset acquisition screening may be required. For these transactions, the basic objective is to ensure that affected persons are provided the means and resources to improve their livelihoods and standards of living, or at least to restore them in real terms, to pre-project levels. As no resettlement is envisaged for CAUSE, there is no requirement for a resettlement action plan. When a project requires land/asset acquisition, depending on the scale of the impact (significant or non-significant) screening will be conducted as part of ESMP preparation and the required actions will be incorporated into the ESMP. Guidelines are provided in Appendix 3.

## **Solomon Islands Government Legislation**

During the preparation of the ESMG, an assessment was carried out on key legislation in relation to the CAUSE project. The main legislation relevant to the project are:

- The Environment Act 1998 and Environmental Regulations 2008
- Protected areas Act 2010 and Protected Areas Regulations 2012
- Land and Titles Act 1988, amended in 1996
- Planning And Development Act, 1980
- Labour Act 1996

A summary of these legal instruments is included in Appendix 2.

In general, the laws of the Solomon Islands align with the Bank's Safeguards Policies. The only difference in operational processes relate to the Sections 71 through 85 of the Land and Titles Act that deals with land acquisition for public purposes and sections 184 through 190 set out the requirements for public right of way. The legislation does not cover project-affected people (PAPs) without title or ownership records, such as informal settlers/squatters (non-titled PAPs) or people with illegal structures or gardens (encroachments) in the right of way, as in covered in the Bank's Safeguard Policy 4.12. Further details and proposed guidelines are provided in Appendix 4.

## 4. Environment and Social Management Framework

### Roles and responsibility for ESMG implementation

Overall the preparation, administration and any updating required of the ESMF is the responsibility of MID and HCC as the Executing Agencies for the Project. In broad terms, implementation of the ESMF will include (i) appraising subproject activities in compliance with the procedures and requirements in the ESMG; and (ii) implementing and monitoring subproject activities in compliance with the procedures and requirements in the ESMG.

To this end, the MID/HCC responsibility will include, but not be limited to; ensuring that the ESMG procedures are strictly adhered to and that preparation of the ESMPs will be carried out in a timely and adequate manner, environmental monitoring and institutional responsibilities are fully met, and that meaningful public consultations are carried out satisfactorily. Executing agencies will ensure that sufficient funds will be provided timely to implement all ESMP activities (see Table 2).

**Table 2. Institutional Responsibilities in Implementation of the ESMG**

Responsibility	Tasks and Functions
MID/HCC	<ul style="list-style-type: none"> <li>• Disclose approved/endorsed ESMG, LAPF and Consultation Plan at the MID and HCC Offices;</li> <li>• Monitor and supervise implementation of the ESMG, including activities of the Community Development Officer (CDO)/Community Liaison Officer (CLO) and Senior Works Officers;</li> <li>• Preparation of budgets required for the implementation of the ESMG;</li> <li>• Before implementation of any activities, ensure that training to the CLOs and Senior Works Officers, and contractors if required, is provided. During implementation, assess needs for training and provide mechanisms for ensuring such training;</li> <li>• Consult with CDO/CLOs on complaints and grievances and process implemented to resolve such complaints;</li> <li>• Based on the reports from the Project Managers, prepare and submit safeguards status reports as part of quarterly reports to the World Bank (WB);</li> <li>• Provide support, as required, to Project Managers, CLOs and Senior Works Officers in the implementation of the ESMG</li> </ul>
Project Managers	<ul style="list-style-type: none"> <li>• Review and approve ESMPs;</li> <li>• Advise Senior Works Officer and Coordinators of ESMP requirements and how to comply;</li> <li>• During construction and operation of subprojects, check performance of contractors on implementation of the ESMPs periodically, and visit each contractor/community group at least once every three months</li> </ul>
Senior Works Officers	<ul style="list-style-type: none"> <li>• Work with CDO/CLOs/Social Safeguards Officers to consult community groups and community leaders/representatives;</li> <li>• Prepare ESMPs for each subproject and submit to Project manager for approval;</li> <li>• Advise Field Supervisors and Leading Hands of ESMP requirements;</li> <li>• Supervise and check implementation of ESMPs during works/activities</li> </ul>



Responsibility	Tasks and Functions
Community Liaison/ and MID's CDO	<ul style="list-style-type: none"> <li>• Facilitate community consultations (jointly between HCC and MID) and community “agreements” and/or MOUs for subprojects as per the Project’s Consultation Plan;</li> <li>• Document, with requisite signatures from Councillors or WAC members, agreements or MOUs;</li> <li>• Following identification of land required for subprojects (through coordination with CLO), undertake consultations with leaseholders, complete inventory of assets and losses form, and assist in implementation of identified safeguard actions incorporated in the approved ESMPs (endorsed by SIG and no-objection from WB);</li> <li>• Disclose ESMPs, safeguards-related plans and information on grievance redress mechanism at executing agency offices and to affected villages;</li> <li>• Receive and record complaints from affected households, communities or villages, individuals, and respond with solution, in consultation with Project Managers, other stakeholders where required;</li> <li>• Monitor implementation of safeguard actions incorporated in the ESMPs;</li> <li>• During works and activities, assist Project Managers to check on performance of contractors/community groups on implementation of ESMPs periodically, and accompany Project Managers in visiting each contractor at least once every three months</li> </ul>
Contractors	<ul style="list-style-type: none"> <li>• Implement ESMPs and comply with any additional requirements advised by, or on behalf of, Project Managers;</li> <li>• Prepare monthly status reports and submit to Field Supervisors/Senior works Officers</li> </ul>
COL	<ul style="list-style-type: none"> <li>• Work with MID/HCC to identify affected parcels of land, lease arrangements, and lease-holders;</li> <li>• Consult (with assistance from CLOs) and negotiate with leaseholders;</li> <li>• Sign compensation contracts, after these have been prepared;</li> <li>• Advise MID/HCC to pay compensation or deliver in-kind compensation</li> </ul>
PMCBU	<ul style="list-style-type: none"> <li>• Provide advice and assistance to CLOs/Social Safeguards Officers in conducting social and land acquisition screening, as well as in preparing land acquisition;</li> <li>• Provide advice and assistance to Coordinators (HCC) and Senior Works Officers in compiling the ESMPs based on the ESMGs; and</li> <li>• CDO to assist with organising MOUs as required and in responding to complaints (first instance) from affected households or villages; and</li> <li>• Provision of capacity building or training on safeguards as required.</li> </ul>
World Bank	<ul style="list-style-type: none"> <li>• Review ESMG and provide non-objection;</li> <li>• Prior review of the first subproject that requires land acquisition under Sub-component 1.a and Sub-component 2.b.</li> </ul>

Capacity building and training for ESMG will be provided through two primary mechanisms; (i) direct technical assistance from the CAUSE project staff to HCC and MID, as well as provincial government staff, if and where required; and (ii) specific requests for assistance and support, on an as required basis, from the CDO and safeguards specialists assigned to the Project Management and Capacity Building Project (within MID for SIRIP) (PMCBU) or to the project. There are two ADB funded multi-year projects being implemented within MID which comprise extensive capacity building components in a number of aspects including safeguards assessment and management.

The training for CAUSE should complement and supplement any training conducted under SIRIP and Domestic Maritime Sector and Technical Support Program (DMSTP) in terms of support to overall capacity development. The training will focus on the needs of management and monitoring of CAUSE sub-projects under the wider umbrella of institutional strengthening, which covers the safeguard requirements of a number of SIG's development partners, including WB.

## **Management of Social Impacts**

At the commencement of the CAUSE project, and in line with Bank Safeguards Policy 4.10 and the stated project principles under section 1, the project will take a transparent and equitable approach to access to project benefits. Management of social impacts will be facilitated by a transparent and fair process of selection, prioritization and participation. For this reason, this section outlines the basic requirements for selection of communities, sub-projects and for targeting of participants.

The project will prioritize the participation of women and young people from vulnerable communities. The prioritization of works, particularly for Component 1a will involve identifying communities where there is a priority need for community works. In REP, the demand for community-based works was high and increasing. It is expected that the community awareness activities for CAUSE will similarly result in a high level of demand for support. Consequently, the project will use a process of screening for selection of priority sub-projects. This process will build from the experience of REP where a Vulnerability Assessment Tool was prepared and implemented that screened communities according to four key characteristics: (i) basic services, (ii) livelihood, (iii) population, and (iv) access. The higher the score achieved, the more likely that the community will be prioritized for the next community works. This Tool was successfully applied during REP for geographic targeting of communities for the support of sub-projects and to ensure that individual workers from vulnerable communities have equal access to employment opportunities.

During the community consultation for the CAUSE social assessment and these guidelines, the feedback from stakeholders and from community members was positive with the use of the vulnerability assessment as a tool. However, they consistently raised a further key point that leads to vulnerability – safety factors. The point raised was that in the provincial centres, there is less distinction between the vulnerability of different communities as the areas are more homogenous and it will be more difficult to distinguish between the levels of need. However, one factor was clearly identified by communities as a priority for intervention. On discussion, communities highlighted risks to life and serious injury as a priority. This could be from poor access or risks of extreme flooding, etc. Other risks may be less serious but still of concern to communities. In this regard, communities considered it fair and reasonable to prioritize other communities over their own needs.<sup>5</sup>

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<sup>5</sup> See Appendix \*. Summary of community consultation for SA and ESMG

For this reason, the vulnerability tool used under REP has been updated and is included in Appendix 5.

In addition, as a part of sub-project planning and selection, the project routinely screened sub-projects for their estimated labor content; assessed their potential impacts on the community as well as specific impacts on women and youth.

## **Component 1**

The Urban Works and Services, executed by HCC in coordination with the GP, MP and WP governments, will prioritize the delivery of a range basic infrastructure and services in the waste management and transport sectors implemented by local community groups and contractors through sub-grants and contracts.

For sub-component a. *Community-Access Infrastructure* which will support construction of small infrastructure include Jacob's Ladders, footpaths, small bridges, swamp crossings, and drainage improvements will require a detailed works planning process. Candidate subprojects will be discussed with Councilors, Ward Committees and community groups. Consultations will focus on selection of subprojects by the Councilors, with agreement by the community groups and Ward Committees where active. Agreements will be established based on satisfaction of the pre-conditions being met.

Subprojects will be subject to a screening process (Appendix 3 Annex 1). The screening will reflect if there will be any land/asset acquisition impacts. The nature and scale of the impacts will determine the mitigations required to be implemented or whether a subproject is deemed ineligible for funding under the Project due to the presence of illegal structures in the Right-of-way (ROW). In addition, community groups of approximately 20 people will be engaged to conduct the required works, with associated care taken in relation to consultation processes (Appendix 6) as well as effective human resource management procedures. For the specific works in component 1 a, a similar range of risks and mitigation measures would need to be considered as outlined for Component 2 (see Table 3)

Sub-component b *Waste Management Services* will focus on the collection, recycling and increasing awareness on waste as well as ensuring that the garbage collected under the project is well integrated with other back-end services supported by the provincial authorities, such as the transportation and land filling of waste. Under this sub-component, community groups will be engaged under task-based contracts will cover defined geographic areas and tasks tailored to the needs of each urban center. Typically, each group will be comprised of about six people for a work period of 20-30 days.

In contrast to the previous project, CAUSE will introduce a shift in the focus and management of labor to help to strengthen operational and economic efficiencies and contribute to sustainable urban service delivery. Therefore, the project will change the focus of the service delivery by community groups -such as waste collection, beautification and maintenance- from time based to task based payments. The aim is to increase productivity per unit of cost. The pilot task-based street cleaning operations under REP will provide valuable information for this shift and how it will affect work practices. Any major shift in work practices needs to be fully disclosed and included in the consultation plan.

## **Component 2**

Component 2 will involve road repair and maintenance activities that will be delivered through small civil works contracts implemented by small to medium sized contractors.

Two types of contracts will be procured. The first will be Routine Road Maintenance, for periodic maintenance of the existing road network. The purpose of routine maintenance is to prolong the life-span of the road. The work will involve reshaping of the road embankment and wearing course, spot re-graveling, repair of culverts and wing walls, and routine maintenance such as patching, potholing, cleaning and cleaning of the drainage system.

The second type of contract will cover road Improvement and Rehabilitation, which will deliver road improvement contracts to tertiary and secondary road sections that have been damaged by severe weather events and are no longer in maintainable condition. Potentially road drainage contracts may also be procured. The work will involve increasing the number and capacity of drainage structures both along (side drains) and across the road, with cross water structures such as culverts. Where possible, the project will use labor-based work methods supplemented by machine based technology.

Based on the list of possible subprojects and clarification of their locations with MID and SIRIP6, the type of impacts expected from the various activities will be identified. The identification of potential impacts of Component 2 activities and works has been based on the types of environments in which works are being proposed and any special features within these environments that need to be considered in development of mitigation measures.

Table 3 presents the activities and works for Component 2 along with the anticipated environmental and social impacts associated with those activities.

**Table 3. Identified Impacts of CAUSE Component 2 Activities and Mitigation Measures**

<b>Works/Activities</b>	<b>Anticipated impacts</b>	<b>Mitigation measures</b>
Clearance of ROW, installation of drains and culverts, minor road widening	Minor loss of land or use of land; acquisition or removal of legal small assets (temporary structures, crops, trees) from ROW	<ul style="list-style-type: none"> <li>• Consult with lease-holders and other stakeholders;</li> <li>• Consult with COL and request resumption of land (as per LAPF);</li> <li>• Prepare and implement required actions for inclusion in the ESMP.</li> </ul>
Site preparation – approaches, and embankments	Damage to waterway, river bed and banks; Downstream siltation; Change in downstream flows (increased velocity)	<ul style="list-style-type: none"> <li>• Design works to minimise impact on waterway;</li> <li>• Do not dispose of solid waste on river bank or in downstream waterway;</li> <li>• Minimise disturbance to river banks to avoid destabilisation;</li> <li>• Consider present flow rates and assess new flow rate after culvert;</li> <li>• Check for downstream vulnerabilities to higher flows</li> </ul>
Aggregate/gravel extraction	Impacts of sourcing materials from inappropriate locations	<ul style="list-style-type: none"> <li>• Use already identified/approved quarries or aggregate/gravel sources;</li> <li>• Follow MID's Aggregate</li> </ul>

<sup>6</sup> One of the technical advisors to SIRIP's Project Management and Capacity Building Unit (PMCBU) is responsible for developing a maintenance and asset management system and is aware of the locations of many of the roads being considered for works under REP.

Works/Activities	Anticipated impacts	Mitigation measures
		<ul style="list-style-type: none"> <li>• Extraction Guidelines;</li> <li>• MID/HCC/Provincial Governments sign MOU (covering royalties/compensation) with resource owners if new source identified and negotiation agreed</li> </ul>
Filling of potholes and ruts on the carriageway	<p>Impacts to nearby land surfaces from extracting local fill material;</p> <p>Water quality and land contamination impacts from accidental fuel/oil spills or leaks from machinery or stores</p>	<ul style="list-style-type: none"> <li>• Select extraction site with care as follows;</li> <li>• Avoid destruction of crops and natural vegetation;</li> <li>• Avoid sites within 100m of waterway;</li> <li>• Protect site from runoff;</li> <li>• Store extracted or stockpiled gravel in selected place;</li> <li>• Protect from erosion by covering and providing interception drains;</li> <li>• If machinery is used: (i) vehicle, machinery, maintenance and re-fuelling will be carried out so that spilled materials do not seep into the soil; (ii) fuel storage and refilling areas will be located at least 50 m from drainage structures and 100 m from important water bodies; (iii) oil trays will be used under vehicles in on-site parking areas</li> </ul>
Grading and camber shaping	<p>Damage to adjacent lands through careless machine use;</p> <p>Water quality impacts from runoff from unconsolidated surfaces and stockpiles.</p> <p>Water quality and land contamination impacts from accidental fuel/oil spills or leaks from machinery or stores.</p>	<ul style="list-style-type: none"> <li>• Protect any stockpiles from erosion by covering and providing interception drains if left overnight.</li> <li>• Minimise area of disturbance.</li> <li>• Machinery fuel/oil spill safeguards (see above)</li> </ul>
De-silting culverts and clearing inlet and outlet structures	<p>Damage to vegetation and crops, and siltation of waterways from unplanned spoil disposal</p>	<ul style="list-style-type: none"> <li>• Store spoil in selected place;</li> <li>• Protect from erosion by covering and providing interception drains</li> </ul>
Clearing side, catch-water and mitre drains	<p>Damage to vegetation and crops, and siltation of waterways from unplanned spoil disposal;</p> <p>Impact on waterways from drainage water</p>	<ul style="list-style-type: none"> <li>• Store spoil in selected place;</li> <li>• Protect from erosion by covering and providing interception drains;</li> <li>• Locate mitre drains to direct water to vegetated areas before reaching water bodies</li> </ul>
Clear structures and waterways	<p>Temporary impact on water quality from damage to banks</p>	<ul style="list-style-type: none"> <li>• Design works to minimise impact on waterway;</li> </ul>

<b>Works/Activities</b>	<b>Anticipated impacts</b>	<b>Mitigation measures</b>
	or disposal of solid waste	<ul style="list-style-type: none"> <li>Do not dispose of solid waste on river bank or in downstream waterway</li> </ul>
Vegetation clearance and cutting of grass and bush	Loss of valuable vegetation and shade trees; De-stabilization of slopes and riverbanks	<ul style="list-style-type: none"> <li>Keep within a specified clearing distance from the road;</li> <li>Avoid accidental damage to trees;</li> <li>Maintain stabilising vegetation cover on roadside slopes and river banks</li> </ul>
Excavation of drains and trenches etc	Erosion of excavated material and stockpiles leading to siltation of waterways.  Damage to adjoining crops or natural vegetation due to side road.  Water quality and land contamination impacts from accidental fuel/oil spills or leaks from machinery or stores.	<ul style="list-style-type: none"> <li>Protect excavated spoil from erosion by covering and providing interception drains if left overnight.</li> <li>Minimise area of disturbance;</li> <li>If machinery is used: (i) vehicle, machinery, and equipment maintenance and re-fuelling will be carried out so that spilled materials do not seep into the soil; (ii) fuel storage and refilling areas will be located at least 50 m from drainage structures and 100 m from important water bodies; and (iii) oil trays will be used under vehicles in on-site parking areas.</li> </ul>
Spoil and waste handling and disposal	Damage to vegetation and crops, and siltation of waterways from unplanned spoil disposal	<ul style="list-style-type: none"> <li>Store spoil in selected place;</li> <li>Protect from erosion by covering and providing interception drains;</li> <li>Dispose of waste at only HCC designated dumps and sites</li> </ul>
Placement of pipes; backfilling and compacting	Water quality and land contamination impacts from accidental fuel/oil spills or leaks from machinery or stores.	<ul style="list-style-type: none"> <li>Machinery fuel/oil spill safeguards (see above)</li> </ul>
Construction of headwalls	Accidental spillages of wet cement, or cement washings into the river. Cement is highly toxic to fish and other aquatic animals	<ul style="list-style-type: none"> <li>Establish clear separation of concrete batching works from any drainage to the waterway;</li> <li>Avoid spills of cement or disposal of excess mixed cement into waterway;</li> <li>Protect dry cement stocks from wind</li> </ul>

The ESMG has been based on the types of EMPs currently being developed by MID for its infrastructure projects, although these are more complex and detailed than that envisaged for the CAUSE project. The ESMG covering activities such as drain and culvert installation/cleaning, road maintenance, road repair, crossing/bridge building, landscaping, etc. can be developed as a “code of practice” for each activity type. It should be noted, that extraction of stone, aggregate or shingle requires development consent from the Environment and Conservation Division (ECD) of the Ministry of Environment, Conservation and

Meteorology (MECM) and therefore could apply to some of the subprojects, depending on the volume of materials required and where they can be sourced.

In respect of the development of mitigation measures for land/asset acquisition, these will comply with SIG laws as well as WB's safeguard OP 4.12 Involuntary Resettlement.<sup>7</sup> While no resettlement impacts are envisaged by the types of works and activities under REP, there could be issues created by (i) need to resume part or all of some parcels of land from lease arrangements; and (ii) need for removal of trees, crops or even structures from the road-side for some labor-based works. The LAPF prepared as part of the ESMG (Appendix 3), and following further consultation, would need to be endorsed by both SIG and WB.<sup>8</sup> The LAPF identifies the types of activities or impacts likely to cause land/asset acquisition impacts, as well as the people entitled to compensation, and what type of compensation they are entitled to by way of an entitlement matrix.

While the roads to be included in the project will be identified as part of the design process, the segments which will be the subject of works under the project are not yet known, given that the presence of illegal structures/encroachments could make segments ineligible for financing under the project. Therefore APs cannot be prepared until the actual segments have been identified based on the eligibility of subproject investments, following detailed survey. The screening will be conducted (Appendix 3 Annex 1) as a first step to see wherever the impact can be avoided, mitigated or minimized as much as possible. The screening/scoping will be documented in a form which shows affected individuals, potential impacts of the project, and the rights of affected people, including vulnerable groups, to compensation. Where the screening identifies that a subproject will trigger acquisition processes.

The land/asset acquisition screening process will be conducted by the CLOs, who will work closely with the Commissioner of Lands (COL) and MID/HCC/Provincial Governments, as well as with involved communities and individuals. The ESMPs will be prepared in a fully consultative manner, as required by the LAPF and WB safeguards policies.

### **Component 3**

Infrastructure and Service Delivery Training (ISDT) will be implemented by HCC in coordination with the provincial governments, building on the capacity developed during the latter half of REP to implement its activities directly, using a combination of PMU staff, and contracted trainers. The training will be based on the successful PET modules under REP and include: basic life skills; OH&S; basic financial literacy; improve the knowledge and skills of beneficiaries regarding labor-based construction and service delivery methods as well as contracting and payment arrangements. Additional modules may only apply to contractor staff and community groups that aim to take up contracting.

In addition, the ISDT will contribute significantly the management of social safeguards by collect socio-economic data as part of its registration process that will be used to track whether project benefits are being equitably spread. The data can be matched against the vulnerability screening tool applied as part of the targeting and selection process.

Other activities may include assisting project participants to set up bank accounts; conduct counseling and referral services to other social intermediaries; and provide stipends for

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<sup>7</sup> WB's definition of resettlement impacts include not only relocation of people or households or the effects of direct acquisition of land but also the loss of/restricted access to land or use of land/resources.

<sup>8</sup> The LAPF includes: SIG law and WB policy covering the issues; likely screening and trigger for resettlement plans; process for determining and assessing resettlement impacts; entitlements, eligibility for entitlements; preparing the resettlement plan (including typical contents of a plan); institutional responsibilities for implementation; budget, financing and schedule; and, monitoring.

bus fare and lunch. These activities will enhance project benefits, particularly to vulnerable community members by increasing financial inclusion and addressing social issues. As noted in the social assessment, this component may include specific strategies to identify and make efforts to include participants with specific needs such as those that are illiterate or disabled. Responding to feedback from participants as well as trainers involved in the PET, the ISDT is likely to include two additional days of training, to allow time for absorption of more complex topics.

Throughout these activities, it will be important for the project participants to be well informed of project rules and processes to ensure understanding and mitigate risks of elite capture or marginalization of most vulnerable individuals and communities (See Environmental and Social Assessment Report and Attachment 1).

## Component 4

The Project Management will include safeguards oversight, communications & media support, as well as standard project management activities in line with Table 4. As part of the project's impact evaluation, baseline, and follow-up surveys of communities in project impact areas, beneficiaries, and contractors, will be carried out to measure key result indicators. The social assessment identified that the main institutional risks will arise from changing political contexts, changing leaders and potential misalignment or miscommunication with implementing institutions. The Project Steering Committee will provide the main institutional mechanism for addressing these risks. In addition, the Project will need to generate clear plans and communications to report on its activities to the Steering Committee so that there is clarity on aligning works and processes.

**Table 4. Safeguards Management in CAUSE**

<b>Steps</b>	<b>Process</b>	<b>Responsible Institution</b>
Condition survey	Condition survey of 105 km of road including identification of obstructions etc in the ROW	TA Consultant (WB) and MID
Screening for land/asset issues (using form in Appendix 3 Annex 1)	Filed visits and consultations of subprojects identified in condition survey with potential issues, along with to footpath/steps subprojects; Complete LA screening checklist	CLOs/ Social Safeguards Officers; COL; MID/HCC (on behalf of SIG)/WB
Compilation of ESMP (using ESMGs included as Appendix 1)	As part of the planning process for the preparation of a sub project activity, the revised standard Mol EMP must be completed and included in the sub project dossier.  For sub project activities that require engineering drawings, some of the mitigation measures detailed in the ESMP would also be included in these drawings.	CLOs/ Social Safeguards Officers; Senior Works Officers will compile the ESMPs, these will be reviewed and approved by the Project Managers; Director of Works (HCC) and Head of Transport Policy and Planning Division (TPPD) in MID / Provincial Government Designated Officer (PGDO) will undertake spot-checks and quality assurance checks of the ESMPs
Incorporate ESMP into road repair and rehabilitation contracts, and agreements with	The standards civil works/labor based contracts will be amended to include the ESMP as part of the legally binding documents. Costs contained in the ESMP for each	Senior Works Officers Submitted to Project Managers; Director of Works and Head of TPPD



<b>Steps</b>	<b>Process</b>	<b>Responsible Institution</b>
community groups in respect of footpath/step construction	activity will also be included in the contact sum. Where appropriate Bills of Quantities will be revised to include the requirements in the ESMP to ensure costs environmental management costs are reasonable determined and payable under the terms of the contracts.	
Preparation and implementation of APs, as required for subprojects	As set out in the LAPF and Consultation Plan	CLOs/ WC; COL; PGDO MID/HCC (on behalf of SIG)/WB
Supervise ESMP implementation as part of overall subproject activity	During contract execution and as part of the supervision of the works, the implementation of the measures in the ESMPs will be monitored as per the monitoring plan in the ESMP to ensure mitigation measures are being implemented, to confirm the efficacy of these measures and to determine if changes are necessary	Field Supervisors and Coordinators will check compliance with ESMPs
Prepare periodic and monitoring reports	The preparation of periodic monitoring reports will be compiled for a group of sub project activities to be maintained as part of the CAUSE project records. Timing and frequency for the preparation of these reports will be agreed and stated in the ESMP	Senior Works Officers Additional checks by Project Managers and Director of Works and Head of TPPD Submitted to WB for use in post review of the implementation of the ESMP during supervision missions etc

The PMU will be responsible for management of the PIU offices to be established in Auki and Gizo. The Gizo PIU will also service Noro and Munda. The PIU operations will be particularly important for safeguards implementation because they will be the direct interface between the project and the communities in the new project provinces. In this regard, the PIU staff, the works supervisor, community liaison officer, and an administration/finance officer will all require training in the project safeguards procedures and be provided with the promotional material to ensure that all communities in the project areas are well-informed of the project, including the consultation and complaints procedures.

## **5. Community Consultation Framework**

### **Consultation and disclosure**

The community consultation for the project responds to the requirements of the Bank's safeguard Policy 4.10 to ensure equitable spread of benefits through the project

communities, all of which are largely Indigenous Peoples. In addition, the Consultation processes are in line with the Bank's best practice Policy on disclosure and consultation.

The preparation of the ESMG involved field visits in Guadalcanal, Honiara, Auki, and Gizo in early August 2017. Information from Munda and Noro was based on secondary data and observations from a previous visit of the Social Assessment (SA) team to these towns. During the visits, non-structured and semi-structured interviews were conducted with representatives of:

- Appropriate local government authorities in project areas (HCC, GP; MP and WP Governments);
- Relevant national Government ministries including MPGIS; MID;
- The PMU of the current REP, and current counterparts HCC and MID; and
- Locally based non-government organizations.

Focus Group Discussions (FGDs) were held in the target communities of Auki and Gizo with local community groups such as church and women's groups. Special care was taken to ensure the appropriate participation of women and young people within the project area in these consultations in order to understand their views. Where specific locations of risk were identified by community e.g. where access had led to isolation or injury to community members, where flooding has occurred or where safety for children was of concern, visits were taken to those areas for ocular inspection and discussion with individuals close to those areas. Due to the limited available time for the field visits, notes from previous community consultations conducted by project staff were also collected, and key informant interviews were held with project staff to deepen understanding of points raised during those previous consultations. A list of persons met is contained in Appendix 5.

The level of engagement with stakeholders within the available time period limits the breadth of consultation and input. Efforts were made to make as wide an engagement with stakeholders as possible within the time frame and to link with key community leaders as key informants. The consultations were done in English with consecutive translation in Solomon Islands Pidgin where needed. By using a combination of participatory methodologies that best suit the situation at hand, targeted groups were encouraged to share their views about the project. Specific meetings were held for women and men's only groups as well as interviews and focus groups with young people. Key respondent interviews were also done to further substantiate findings.

Furthermore, the direct consultation on the draft report was limited to Guadalcanal rather than repeating the consultation in all proposed project locations. For this reason, the community consultation guidelines for this project proposed active and frequent community consultations on specific project activities to ensure engagement and proper alignment with community priorities and cultural practices. To mitigate the limited scope of investigations, the mission drew from previous mission experiences with community consultations using key informants from the REP PMU and other key stakeholders to summarize community feedback from those sessions.

The results of the consultations were used to explore the interests of the proposed target groups in the proposed project, their perceptions of current problems related to finding employment and jobs (small contracts) and any resources they could bring to the achievement of goals and objectives of the project. In addition, these consultations were used to confirm broad based community support for the need for such a project. A summary of the main consultations undertaken during preparation of the Social Assessment and ESMG is provided in Appendix 6.

The importance of open and clear communications was emphasized by the recommendations in the Social assessment report which noted included recommendations

for clear and active community consultation and engagement processes. In the social assessment analysis, the underlying strategy for enhancing equitable and optimal benefits to the target group related to ensuring that the project selection criteria, priorities, processes, rules and expectations are clearly stated and widely communicated so that there is a common understanding of project requirements. The social assessment identified that stakeholders and communities are widely in support of project targeting for vulnerability and also safety concerns. The importance of multiple and over-lapping communication networks and the consistency of key messages is important so that stakeholders and communities can effectively engage with project processes without risk of miscommunications or disputes.

A main social risk arises in relation to actual (or perceived) inequitable treatment of different parts of the targeted communities or unrealized expectation. These need to be addressed through the community communication mechanisms; yet also require the project to have clear and transparent “rules” that are considered fair and reasonable, can be easily communicated and are strictly adhered to. Also there are high expectations of project benefit that need to be managed in relation to available project resources to avoid disappointment.

Potential gaps in inclusion, particularly for small, less vocal communities, those with low educational levels and women whose male family members prevent their engagement with the project require specific strategies to enhance engagement. These can be addressed through the initial Vulnerability Assessment Tool identifying potentially marginalized groups. Addressing gender concerns can be mitigated initially by clear project information regarding the expectation that women will participate, through respecting local concerns regarding work conditions and hours, and through working with local NGOs and associations working on gender issues. The role of the proposed Community Liaison Officer in each project location will be important to ensure inclusion and equitable benefits. Other gender analyses are included in the social assessment report. For individuals with special requirements, the training can be tailored to their needs in a way that avoids conflict and builds confidence.

## **Consultation Plan**

In preparation for the project, a detailed Consultation Plan has been prepared in draft form (See appendix 7) The Consultation Plan prepared for the Project has been built upon existing consultation protocols already implemented by MID and HCC, and further modified during REP as required to fit the subproject planning cycle including subproject identification; impact and mitigation assessment and identification; information disclosure (including any separate processes required under the LAPF); implementation; and, monitoring. The same process for undertaking consultations will be used during implementation, as well as the process for disclosure of project information, is set out in the Consultation Plan which has been prepared as a table indicating subproject stage, information disclosure and feedback mechanism, timing, and responsibilities. This Consultation Plan will need to be reviewed and updated on a regular basis as project implementation proceeds.

For larger scale subprojects (i.e. step/footpath construction and road repairs), in preparation of each subproject the MID/HCC/PG will, through the CDO and CLOs facilitate, consultations with community groups as well as leaders of the community (Councilors and Ward Committees). The purpose of these consultations is to (i) select subprojects; (ii) initially agree/confirm community participation (based on the satisfaction of the pre-conditions); and (iii) obtain views of the local people, including of the vulnerable groups, concerning the environmental and social issues related to the project which they feel are important, and to discuss possible land/asset acquisition. Consultation with the community is done through public notices, meetings with Councilors and WACs who pass

on information to community groups (and individuals). Under REP, for smaller scale subprojects such as river clean-ups and rubbish removal, community groups applied to HCC and the application was endorsed by a Ward Councilor. Information will be disclosed through the Councilors, Ward Committees, public notices and through the public disclosure of the ESMGs and other relevant project information.

It is worth noting that during the consultation, the Ward Committees in Gizo are very active and were seen as the first conduit of information, supplemented by information circulated through other community networks such as tribal groups and churches and community associations. In Auki, the Ward Committees were less active and church groups were considered to be one of the most important avenues for communication. Nonetheless in all project areas, it was clear that the project should not rely only on one communication pathway and that key communication should circulate through as many different pathways as possible, using both written and verbal means of communication.

The prepared ESMPs, as well as compensation policies and grievance procedures will be discussed during the consultation meetings. The CLOs will document the comments and feedback, including any preferences for situation of access ways/footpaths or steps, types of compensation etc in the minutes of the meetings. These minutes need to indicate participation of vulnerable groups, as well as specific issues raised by these people. The minutes will be recorded on a Meeting Minutes datasheet and will be made available for monitoring purposes.

## **Disclosure**

The Bank requires that the public consultation be conducted as part of EA and continued during sub-project planning. Following consultation with stakeholders and approval of the ESMG, the approved report and ESMG (including the LAPF) will be disclosed in public places as well as uploaded to WB's Infoshop and website. A list of people consulted during preparation of the ESMG is provided in Appendix 5. In addition to the formal disclosure of the social assessment and ESMG, the project would include extensive consultation with communities and stakeholders. The Consultation Plan has been prepared for the project and is outlined in Appendix 6.

## **6. Grievance Redress Mechanism**

REP currently has in place a GRM that is designed to facilitate feedback from any project participant or stakeholder regarding project operation and impacts of activities. The GRM has been reviewed as part of the social assessment process and an updated GRM is included in Appendix 7. Stakeholders will be informed of the project GRM during the consultation periods. It will be important for the project to provide effective information on the GRM to stakeholders at the onset of project implementation, especially in sub-project sites. Complaints submitted by any individual will be handled one by one on an individual basis. Complaints raised by communities will be handled through consultation with the community to provide solutions to the specific grievance. Complaints over compensation for land has been covered in the LAPF in Appendix 3.

Complaints on environmental, health and safety issues such as dust, noise, waste generations, health concerns, safety risks for the public etc. should be resolved directly by the PMU. The complainants will be directed to discuss their complaint directly with CLOs (as representative of the EAs). For the straightforward complaints, the CLOs can make an on-the-spot determination to resolve the issue. For more complicated issues, CLOs will forward the complaint to the EAs. Should the complainant not be satisfied, the complainant may take the complaint to HCC, MID or PG managers who will effectively address the issues. The CLO will record all complaints (date, complainant, complaint/grievance,

attempts to resolve the complaint, and outcomes). The record of the grievance redress mechanism will be the subject of monitoring. In addition, the updates to the GRM include a more rigorous promotion of the GRM and a distinction between feedback, complaints and incidents that require reporting for OH&S reasons. Furthermore, the provision of neutral, independent communication channels for complaints is important to address potential power relationships or risk of retribution within project processes. The details of the process flow for complaints are included in Appendix 7.

## **7. ESG Monitoring and Evaluation**

Regular monitoring of the ESG activities and, in particular, compliance with Bank Safeguard Policies and SIG legal requirements is essential to ensure proper implementation of the project. Compliance with provisions of LAPF and ESMPs during implementation would need to be reviewed on a regular basis.

Regular data provided by works and the training contractors will serve as the basis for output monitoring. In addition, the training services contractor will record basic socio-economic data as part of the registration process under Component 3, and conduct surveys of both communities and contractors to respond to key outcome indicators.

The parameters or indicators to be monitored for the ESG include:

- Number of site visits undertaken during screening;
- Screening checklists prepared and approved;
- The ESMPs compiled and compliance with approved ESMPs during implementation of subproject activities and works;
- Adequacy of environmental and social impacts/risk mitigation;
- ESMPs prepared and implemented;
- Adequacy of contractor ESM-related record keeping and monthly reporting;
- Complaints and grievances lodged and resolved;
- Consultations (formal and informal) undertaken as per the Consultation Plan;
- Satisfaction of PAPs and stakeholders with the ESMP implementation process.
- Satisfaction of community groups with the overall process, level of consultation, and access to information.

Reviews of the ESG implementation progress should be reported as part of the project quarterly and annual reporting. In addition, Bank Implementation Support Missions will serve as an opportunity to review and update the ESG as required. A major review would be required at mid-term to ensure that no substantive changes to legal frameworks or safeguard policies have occurred.

# **Appendices**

**Appendix 1 – Environmental and Social Management Framework**

**Appendix 2 – Relevant Legislation**

**Appendix 3 – Land/asset Acquisition Policy Framework**

**Appendix 4 – Targeting Selection – Vulnerability Assessment Tool**

**Appendix 5 - List of those Consulted During ESMG Preparation**

**Appendix 6 – Consultation Plan**

**Appendix 7 – Grievance Redress System**

## Appendix 1 – Environmental and Social Management Framework

The following Environmental and Social Management Framework outlines a series of Environmental and Social Management Guidelines (ESMGs) are based on the potential project impacts as identified in Section 3 of the ESGM Report and in line with WB Safeguard Policies as below:

- **Safeguard Policy 4.01 Environmental Assessment**, but only at a Category B - minor and site-specific works level.
- **Safeguard Policy 4.04 Natural Habitats** – as a precautionary measure for any (unlikely) proposed work in parks or if road reserves are widened.
- **Safeguard Policy 4.10 Indigenous Peoples** – triggered due to the presence of Indigenous People; however, as the whole country comprises of predominantly Indigenous People, there is no likelihood of exclusion of IPs as a minority. Consequently, the project plan caters almost exclusively to Indigenous Peoples. The communication plan strongly features processes for equity within the community, between tribes.
- **Safeguard Policy 4.11 Physical Cultural Resources** - as a precautionary measure for any (unlikely) proposed work in parks/ close to memorials or culturally important locations.
- **Safeguard Policy 4.12 – Involuntary resettlement** – no human resettlement is expected to occur in this project; in fact any projects potentially requiring resettlement would not be approved. This safeguard policy is triggered for the rare occasion when sub-project works may result in the loss of minor assets (e.g. productive trees, vegetable plots, etc) to allow infrastructure to be installed.

The ESGMs are tailored to specific activities included under Component 1 and 2 of the CAUSE and can be combined to form an overall Environmental and Social Management Plan (ESMP) for a package of works/contract package. They are designed to identify potential impacts and safeguards to prevent or minimise such impacts for the following activities: road repair; routine road maintenance; drain installation; culvert installation; footpath/step construction; drain/culvert cleaning and rubbish collection; vegetation clearance; and, paving and landscaping, and other activities approved for implementation.

Each of the ESGMs nominate: (i) the responsibilities for implementing the safeguards; (ii) who will check them, how often and how the monitoring will be reported; and, (iii) corrective actions. For works in Honiara, HCC will be the lead for supervision of works. In each province a designated officer will liaise with a project works coordinator to oversee local works.

## SUMMARY SHEET

User Notes: The following summary sheet is to be compiled by the coordinator/supervisor and checked by the EA's Project Manager. The coordinator/supervisor will identify all of the activities to be undertaken for each subproject and the corresponding ESMGs will be compiled as that subproject's ESMP and will form part of the project documentation.

Tick the box adjacent to the activity (subproject works) and attach the relevant ESMPs to the back of the summary sheet. It should be noted that some subprojects may include more than one activity, e.g. road repair may also include drain installation and vegetation clearance, and therefore require additional ESMPs.

Executing agency:	MID / HCC (circle one)
Ward:	
Subproject:	
Name of coordinator/supervisor:	
Contractor/community group:	
No. of people employed:	
Date:	

Tick	Activity	ESMP No.	ESM Guidelines/control measures covered
	Road repair	ESMP 1	Land/asset acquisition; dust control; noise control; erosion and sediment control; stockpile/spoil management and disposal; water quality; materials/aggregate/gravel extraction
	Routine road maintenance	ESMP 2	Dust control; sediment control; stockpile/spoil management and disposal; water quality; materials/aggregate/gravel extraction
	Drain installation	ESMP3	Land/asset acquisition; sediment control; stockpile/spoil management and disposal; water quality; aggregate/gravel extraction
	Culvert installation	ESMP 4	Land/asset acquisition; sediment control; stockpile/spoil management and disposal; water quality; materials/aggregate/gravel extraction
	Footpath/step construction	ESMP 5	Land/asset acquisition; dust control; noise control; erosion and sediment control; stockpile/spoil management and disposal; water quality; materials/aggregate/gravel extraction
	Drain/culvert cleaning and rubbish collection	ESMP 6	Dust control; erosion and sediment control; spoil/waste management and disposal; water quality; materials/aggregate/gravel extraction
	Vegetation clearance as part of road maintenance	ESMP 7	Community consultation; tree removal; spoil/waste management and disposal;
	Paving , greening and landscaping	ESMP 8	Dust control; noise control; vegetation clearance; spoil management and disposal; pesticide use
	Waterway rehabilitation	ESMP 9	Resource acquisition; sediment control; stockpile/spoil management and disposal; water quality; materials/aggregate/gravel extraction



**ESMP 1 – ROAD REPAIR AND REHABILITATION**

Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
Loss of land or use of land; acquisition or removal of legal assets (structures, crops, trees) from ROW	To compensate for losses and ensure that the livelihood of affected person/household is at least restored to pre-project levels	<ul style="list-style-type: none"> <li>Consult with lease-holders and other stakeholders;</li> <li>Consult with COL and request resumption of land (as per LAPF);</li> <li>Prepare and implement RP as per the LAPF</li> </ul>	MID; MID- CDO/CLO; COL	MID – TPPD; WB	As per the grievance redress mechanism in the LAPF
Dust generation, impacts on air quality, nuisance	To reduce impacts on air quality and nuisance; to ensure there is no health risk or inconvenience due to dust generation	<ul style="list-style-type: none"> <li>Spray water on exposed surfaces during dry periods;</li> <li>If required, install dust screens when working adjacent to residential areas/schools/clinics;</li> <li>Ensure that vehicles carrying materials are either damped down or are covered with tarpaulin or similar;</li> <li>Ensure that any materials being transported by vehicle to the site are not carried in the open</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly monitoring by MID – TPPD;	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately
Noise impacts on communities/sensitive uses (schools/clinics)	To minimise noise on local community and sensitive uses	<ul style="list-style-type: none"> <li>Ensure that vehicles transporting materials for works are well maintained and equipped with mufflers;</li> <li>Advise managers of sensitive uses (schools/clinics) of works in the area and possibility of periods of unavoidable noise;</li> <li>Carry out activities during the day and only during working hours i.e. between 8am and 5pm</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly monitoring by MID – TPPD;	Discuss with local community representatives; Any vehicles producing excess noise shall cease operation and remedial action taken to satisfaction of Project Manager or Coordinator/Supervisor
Removal of significant or shade trees	To consult with community to identify such trees and avoid removal if possible	<ul style="list-style-type: none"> <li>Work carefully in such areas;</li> <li>Avoid tree removal where possible</li> </ul>	Supervisor of community group	Weekly inspections by HCC PGDO – MID;	Community consultation
Aggregate/gravel extraction	To minimise the impacts of sourcing materials from inappropriate locations	<ul style="list-style-type: none"> <li>Use already identified/approved quarries or aggregate/gravel sources;</li> <li>Follow MID's Aggregate Extraction Guidelines</li> </ul>	Inspections by contractor; Supervisor of community group	Weekly monitoring by MID – TPPD;	Sign MOU (covering royalties/compensation) with resource owners if new source identified
Erosion of slopes:	To control the extent and severity	<ul style="list-style-type: none"> <li>Construct temporary sediment and</li> </ul>	Regular site	Weekly	Repairs to damaged

**ESMP 1 – ROAD REPAIR AND REHABILITATION**

Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
sedimentation of rivers and streams; scouring of stream/river beds and banks; run-off affecting water quality	of erosion and/or sedimentation during activities/works	<ul style="list-style-type: none"> <li>erosion control structures as required;</li> <li>Complete works in stages/sections and minimise exposed/cleared ground to the extent possible;</li> <li>Keep adjacent vegetation clearance to a minimum;</li> <li>Avoid disturbance on steep slopes;</li> <li>Avoid discharging water on unstable or steep slopes;</li> <li>Ensure vehicles drive on defined tracks;</li> <li>Encourage re-vegetation of slopes following completion of works</li> </ul>	inspections by contractor; Supervisor of community group; Inspections after heavy rainfall to check for scour, soil erosion or sedimentation	monitoring by MID – TPPD;	areas; re-establishment of vegetation; modify damage control measures as required
Inappropriate spoil/waste disposal	To remove and dispose of spoil and waste material regularly and <u>only</u> to designated areas	<ul style="list-style-type: none"> <li>Re-use spoil/cut wherever possible in other road repair activities;</li> <li>Waste and spoil stockpiles to be stored at least 100m from waterways;</li> <li>Protect excavated spoil and waste from erosion by covering and providing interception drains if left overnight;</li> <li>Rubbish stored in neat/tidy piles awaiting collection;</li> <li>No burning or burying of rubbish;</li> <li>Disposal of rubbish/waste only in approved dump sites or designated areas</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly inspections by MID-TPPD; HCC–WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately
Pollution of water sources; degradation of water quality in streams and rivers	To avoid contamination/pollution of water sources from activities	<ul style="list-style-type: none"> <li>Any sealing activities to be carefully managed through mixing sealant in approved locations only and prevention of on-site mixing;</li> <li>Material stockpiles to be stored at least 100m from a waterway;</li> <li>Vehicles will not be permitted to drive in stream or river beds and will not be parked adjacent to waterways while delivering materials;</li> <li>Accidental spills to be cleaned up</li> </ul>	Daily visual assessment/ site inspections by contractor; Supervisor of community group;	Weekly monitoring by MID – TPPD;	Consult with local community using water sources to identify problems and remedial actions; Immediate addressing of water quality problems to satisfaction of community

**ESMP 1 – ROAD REPAIR AND REHABILITATION**

Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
Safety risks for the workers and the public	To avoid safety risks for the workers during execution of labour-based works  To avoid safety risks for transportation means on the roads, and the public surround the construction sites	<ul style="list-style-type: none"> <li>Immediately; Run-off from site or activities to be directed to temporary settling basin/sediment trap</li> <li>Provide safety gears for the workers to use, such as boots, hats, gloves etc.</li> <li>Ensure that adequate warning signs and sign boards are installed at appropriate locations</li> <li>Ensure that a worker is appointed to direct the traffic as and when needed</li> <li>Keep the land areas for temporary loading materials and wastes minimum</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly inspections by MID-TPPD; HCC- WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately

**ESMP 2 – ROUTINE ROAD MAINTENANCE**

Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
Dust generation; impacts on air quality; nuisance	To reduce impacts on air quality and nuisance; to ensure there is no health risk or inconvenience due to dust generation	<ul style="list-style-type: none"> <li>Spray water on exposed surfaces during dry periods;</li> <li>If required, install dust screens when working adjacent to residential areas/schools/clinics;</li> <li>Ensure that vehicles carrying materials are either damped down or are covered with tarpaulin or similar;</li> <li>Ensure that any materials being transported by vehicle to the site are not carried in the open</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly monitoring by MID – TPPD;	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately
Aggregate/gravel extraction for filling of potholes and fixing ruts	To minimise the impacts of sourcing materials from inappropriate locations	<ul style="list-style-type: none"> <li>Use suitable material excavated/cleared from drains and culverts as much as possible;</li> <li>Use already identified/approved quarries or aggregate/gravel sources;</li> <li>Follow MID's Aggregate Extraction Guidelines</li> </ul>	Inspections by contractor; Supervisor of community group	Weekly monitoring by MID – TPPD;	Sign MOU (covering royalties/compensation) with resource owners if new source identified
Sedimentation of rivers and streams; run-off affecting water quality	To control the extent and severity of sedimentation during activities/works	<ul style="list-style-type: none"> <li>Construct temporary sediment and erosion control structures as required;</li> <li>Complete works in stages/sections and minimise exposed/cleared ground to the extent possible;</li> <li>Keep adjacent vegetation clearance to a minimum;</li> <li>Avoid disturbance on steep slopes;</li> <li>Avoid discharging water on unstable or steep slopes</li> </ul>	Regular site inspections by contractor; Supervisor of community group; Inspections after heavy rainfall to check for sedimentation	Weekly monitoring by MID – TPPD;	Repairs to damaged areas; re-establishment of vegetation; modify damage control measures as required
Temporary impact on water quality from damage to banks or disposal of solid waste from clearing structures and their waterways	To avoid contamination/pollution of water sources from maintenance activities	<ul style="list-style-type: none"> <li>Design and undertake works to minimise impact on waterway;</li> <li>Do not dispose of solid waste on river bank or in downstream waterway.</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly monitoring by MID – TPPD	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately
Inappropriate spoil/waste	To remove and dispose of spoil and	<ul style="list-style-type: none"> <li>Re-use spoil/cut wherever possible</li> </ul>	Daily site	Weekly	Any problems/complaints

**ESMP 2 – ROUTINE ROAD MAINTENANCE**

Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
disposal	waste material regularly and <u>only</u> to designated areas	<ul style="list-style-type: none"> <li>In other road repair activities; Waste and spoil stockpiles to be stored at least 100m from waterways;</li> <li>Protect excavated spoil and waste from erosion by covering and providing interception drains if left overnight;</li> <li>Rubbish stored in neat/tidy piles awaiting collection;</li> <li>No burning or burying of rubbish;</li> <li>Disposal of rubbish/waste only in approved dump sites or designated areas</li> </ul>	inspections by contractor; Supervisor of community group	inspections by MID-TPPD; HCC – WD PGDO	to be recorded (for subsequent monitoring) and acted upon immediately
Removal of significant or shade trees	To consult with community to identify such trees and avoid removal if possible	<ul style="list-style-type: none"> <li>Work carefully in designed areas ;</li> <li>Avoid tree removal where possible</li> </ul>	Supervisor of community group	Weekly inspections by HCC – WD PGDO	Community consultation
Loss of vegetation and destabilisation of slopes and river-banks from cutting grass and bush		<ul style="list-style-type: none"> <li>Keep within a specified clearing distance from the road. Avoid accidental damage to trees;</li> <li>Maintain stabilising vegetation cover on roadside slopes and river banks.</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly monitoring by MID – TPPD;	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately

**ESMP 3 – DRAIN INSTALLATION**

Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
Loss of land or use of land; acquisition or removal of legal assets (structures, crops, trees) from area drain is to be installed	To compensate for losses and ensure that the livelihood of affected person/household is at least restored to pre-project levels	<ul style="list-style-type: none"> <li>Consult with lease-holders and other stakeholders;</li> <li>Consult with COL and request resumption of land (as per LAPF);</li> <li>Prepare and implement RP as per the LAPF</li> </ul>	MID/HCC; Community Liaison Officer (HCC); Community Development Officer (MID); COL	MID – TPPD; HCC – WD; PGDO WB	As per the grievance redress mechanism in the LAPF
Damage to adjacent land or legal structures/trees/crops or natural vegetation due to excavation of drain to specifications	To minimise damage to adjacent land or legal structures/trees/crops and to compensate for damages to legal structures or crops as per the LAPF	<ul style="list-style-type: none"> <li>Minimise area of disturbance along drain alignment;</li> <li>Work carefully in areas where structures or crops/trees are adjacent to drain;</li> <li>If machinery is used avoid water quality and land contamination impacts from accidental fuel/oil spills or leaks from machinery or plant by: (i) vehicle, machinery, and equipment maintenance and refuelling will be carried out so that spilled materials do not seep into the soil; (ii) fuel storage and refilling areas will be located at least 50 m from drainage structures and 100 m from important water bodies; and (iii) oil trays will be used under vehicles in on-site parking areas.</li> </ul>	Contractor; Supervisor of community group	Weekly inspections by MID – TPPD; HCC – WD; PGDO	As per the grievance redress mechanism in the LAPF
Damage to vegetation/crops and siltation of waterways from unplanned spoil disposal	To reduce impacts on water quality and manage spoil disposal; To compensate for damages to crops or productive trees as per the LAPF	<ul style="list-style-type: none"> <li>Store spoil in selected place;</li> <li>Protect from erosion by covering and providing interception drains;</li> <li>Crop/vegetation damage compensated as per provisions of the LAPF</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly monitoring by MID – TPPD; HCC - WD PGDO	As per provisions in the LAPF
Dust generation; impacts on air quality; nuisance	To reduce impacts on air quality and nuisance; to ensure there is no health risk or inconvenience due to dust generation	<ul style="list-style-type: none"> <li>Spray water on exposed surfaces during dry periods;</li> <li>If required, install dust screens when working adjacent to residential areas/schools/clinics;</li> </ul>	Daily site inspections by contractor; Supervisor of community	Weekly monitoring by MID – TPPD; HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately

**ESMP 3 – DRAIN INSTALLATION**

Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
Erosion of slopes; sedimentation of rivers and streams; scouring of banks; run-off affecting water quality	To control the extent and severity of erosion and/or sedimentation during activities/works	<ul style="list-style-type: none"> <li>• Ensure that vehicles carrying materials are either damped down or are covered with tarpaulin or similar;</li> <li>• Ensure that any materials being transported by vehicle to the site are not carried in the open</li> </ul>	group		
		<ul style="list-style-type: none"> <li>• Construct temporary sediment and erosion control structures as required;</li> <li>• Locate miter drains to direct water to vegetated areas before being discharged into waterways;</li> <li>• Complete works in stages/sections and minimise exposed/cleared ground to the extent possible;</li> <li>• Keep adjacent vegetation clearance to a minimum;</li> <li>• Avoid disturbance on steep slopes;</li> <li>• Avoid discharging water on unstable or steep slopes;</li> <li>• Ensure vehicles drive on defined tracks;</li> <li>• Encourage re-vegetation of slopes following completion of works</li> </ul>	Regular site inspections by contractor; Supervisor of community group; Inspections after heavy rainfall to check for scour, soil erosion or sedimentation	Weekly monitoring by MID – TFPD; HCC - WD PGDO	
Inappropriate spoil/waste disposal	To remove and dispose of spoil and waste material regularly and <u>only</u> to designated areas	<ul style="list-style-type: none"> <li>• Re-use spoil/cut wherever possible in other road repair activities;</li> <li>• Waste and spoil stockpiles to be stored at least 100m from waterways;</li> <li>• Protect excavated spoil and waste from erosion by covering and providing interception drains if left overnight;</li> <li>• Rubbish stored in neat/tidy piles awaiting collection;</li> <li>• No burning or burying of rubbish;</li> <li>• Disposal of rubbish/waste only in</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly inspections by MID-TFPD; HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately

**ESMP 3 – DRAIN INSTALLATION**

Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
Pollution of water sources; degradation of water quality in streams and rivers	To avoid contamination/pollution of water sources from activities	<ul style="list-style-type: none"> <li>approved dump sites or designated areas</li> <li>Any sealing activities to be carefully managed through mixing sealant in approved locations only and prevention of on-site mixing; Material stockpiles to be stored at least 100m from a waterway; Vehicles will not be permitted to drive in stream or river beds and will not be parked adjacent to waterways while delivering materials;</li> <li>Accidental spills to be cleaned up immediately;</li> <li>Run-off from site or activities to be directed to temporary settling basin/sediment trap</li> </ul>	Daily visual assessment/ site inspections by contractor; Supervisor of community group;	Weekly monitoring by MID – TPPD; HCC - WD PGDO	Consult with local community using water sources to identify problems and remedial actions; Immediate addressing of water quality problems to satisfaction of community
Safety risks for the workers	To avoid safety risks for the workers during execution of labour-based works, including attacked by insects	<ul style="list-style-type: none"> <li>Provide safety gears for the workers to use as/when needed</li> <li>Warn the workers avoid approaching/disturbing bees or snakes, etc.</li> <li>Ensure that adequate warning signs and sign boards are installed at appropriate locations</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly inspections by MID-TPPD; HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately



ESMP 4 - CULVERT INSTALLATION						
Impact	Objective	Measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action	
			Doing	Checking		
Loss of land or use of land; acquisition or removal of legal assets (structures, crops, trees) from area culvert is to be installed	To compensate for losses and ensure that the livelihood of affected person/household is at least restored to pre-project levels	<ul style="list-style-type: none"> <li>Consult with lease-holders and other stakeholders;</li> <li>Consult with COL and request resumption of land (as per LAPF);</li> <li>Prepare and implement RP as per the LAPF</li> </ul>	MID/HCC; Community Liaison Officer (HCC); Community Development Officer (MID); COL	MID – TPPD; HCC - WD PGDO WB	As per the grievance redress mechanism in the LAPF	
Damage to waterway, river bed and banks; downstream siltation; and change in downstream flows (increased velocity)	To reduce effects on local hydrology and prevent sedimentation of waterways	<ul style="list-style-type: none"> <li>Design works to minimise impact on waterways;</li> <li>Ensure that solid waste is not disposed of, or stored, on river bank or in downstream waterway;</li> <li>Minimise disturbance to river banks to avoid destabilisation;</li> <li>Consider present flow rates and assess new flow rate after culvert;</li> <li>Check for downstream vulnerabilities to higher flows</li> </ul>	Daily visual assessment/ site inspections by contractor; Supervisor of community group;	Weekly monitoring by MID – TPPD; HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately	
Contamination impacts from accidental fuel/oil spills or leaks from machinery or stores	To prevent contamination and reduce risk of accidental spills	<ul style="list-style-type: none"> <li>If machinery is used: (i) vehicle, machinery, and equipment maintenance and refuelling will be carried out so that any spilled materials do not seep into the soil; (ii) fuel storage and refilling areas will be located at least 50 m from drainage structures and 100 m from important water bodies; (iii) oil trays will be used under vehicles in on-site parking areas.</li> <li>Re-use spoil/out wherever possible in other road repair activities;</li> </ul>	Daily visual assessment/ site inspections by contractor; Supervisor of community group	Weekly monitoring by MID – TPPD; HCC - WD PGDO	Consult with local community using water sources to identify problems and remedial actions; Immediate addressing of problems to satisfaction of community	
Erosion of excavated material and stockpiles leading to siltation of	To minimise erosion and subsequent effects on waterways and adjacent land uses	<ul style="list-style-type: none"> <li>Re-use spoil/out wherever possible in other road repair activities;</li> </ul>	Regular site inspections by contractor;	Weekly monitoring by MID – TPPD;	Repairs to damaged areas; re-establishment of	

ESMP 4 - CULVERT INSTALLATION					
Impact	Objective	Measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
waterways		<ul style="list-style-type: none"> <li>Protect excavated spoil from erosion by covering and providing interception drains if left overnight;</li> <li>Minimise area of disturbance</li> </ul>	Supervisor of community group; Inspections after heavy rainfall to check for scour, soil erosion or sedimentation	HCC - WD PGDO	vegetation; modify damage control measures as required
Accidental spillages of wet cement, or cement washings into the river during construction of headwalls	To prevent impacts on water quality and river/stream fauna (cement is highly toxic to fish and other aquatic animals)	<ul style="list-style-type: none"> <li>Construct off-site or establish clear separation of concrete batching works from any drainage to the waterway;</li> <li>Avoid spills of cement or disposal of excess mixed cement into waterway;</li> <li>Protect dry cement stocks from wind by covering with tarpaulin</li> </ul>	Daily visual assessment/ site inspections by contractor; Supervisor of community group	Weekly monitoring by MID – TPPD; HCC - WD PGDO	Consult with local community using water sources to identify problems and remedial actions; Immediate addressing of water quality problems to satisfaction of community
Safety risks for the workers	To avoid safety risks for the workers	<ul style="list-style-type: none"> <li>Install warning signs in uncompleted open holes/drains</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly inspections by MID-TPPD; HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately

ESMP 5 – FOOTPATH/STEP CONSTRUCTION					
Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
Loss of land or use of land; acquisition or removal of legal assets (structures, crops, trees) from area of land to be designated for footpath/steps	To compensate for losses and ensure that the livelihood of affected person/household is at least restored to pre-project levels	<ul style="list-style-type: none"> <li>Consult with lease-holders and other stakeholders;</li> <li>Consult with COL and request resumption of land (as per LAPF);</li> <li>Prepare and implement RP as per the LAPF</li> <li>Document agreements with communities</li> </ul>	HCC; Community Liaison Officer; COL	HCC - WD PGDO WB	As per the grievance redress mechanism in the LAPF
Removal of significant or shade trees	To consult with community to identify such trees and avoid removal if possible	<ul style="list-style-type: none"> <li>Work carefully in such areas;</li> <li>Avoid removal of trees is possible</li> </ul>	Supervisor of community group	Weekly inspections by HCC - WD PGDO	Community consultation
Dust generation; impacts on air quality; nuisance	To reduce impacts on air quality and nuisance; to ensure there is no health risk or inconvenience due to dust generation	<ul style="list-style-type: none"> <li>Provide adequate protective clothing for workers such as gumboots, marks, hats, gloves etc.</li> <li>Spray water on exposed surfaces during dry periods;</li> <li>If required, install dust screens when working adjacent to residential areas/schools/clinics;</li> <li>Ensure that vehicles carrying materials are either damped down or are covered with tarpaulin or similar;</li> <li>Ensure that any materials being transported by vehicle to the site are not carried in the open</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly monitoring by HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately
Pollution of water sources; degradation of water quality in streams and rivers	To avoid contamination/pollution of water sources from activities	<ul style="list-style-type: none"> <li>Material stockpiles to be stored at least 100m from a waterway;</li> <li>Vehicles will not be permitted to drive in stream or river beds and will not be parked adjacent to waterways while delivering materials;</li> <li>Accidental spills to be cleaned up immediately;</li> <li>Run-off from site or activities to be directed to temporary settling basin/sediment trap</li> </ul>	Daily visual assessment/ site inspections by contractor; Supervisor of community group;	Weekly monitoring by HCC - WD PGDO	Consult with local community using water sources to identify problems and remedial actions; Immediate addressing of water quality problems to satisfaction of community

**ESMP 5 – FOOTPATH/STEP CONSTRUCTION**

Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
Stone/gravel extraction or cutting of wood (steps)	To minimise the impacts of sourcing materials from inappropriate locations	<ul style="list-style-type: none"> <li>Use already identified/approved quarries or aggregate/gravel sources;</li> <li>Follow MID's Aggregate Extraction Guidelines (or similar);</li> <li>Consult with resource owners (trees) if wood to be cut and used for steps</li> </ul>	Inspections by contractor; Supervisor of community group	Weekly monitoring by HCC - WD PGDO	Sign MOU (covering royalties/compensation) with resource owners if new source identified
Erosion of slopes; sedimentation of rivers and streams; scouring of stream/river beds and banks; run-off affecting water quality	To control the extent and severity of erosion and/or sedimentation during activities/works	<ul style="list-style-type: none"> <li>Construct energy dispersion walls/ holes along drains on the ladder.</li> <li>Construct temporary sediment and erosion control structures as required;</li> <li>Complete works in stages/sections and minimise exposed/cleared ground to the extent possible;</li> <li>Keep adjacent vegetation clearance to a minimum; Recover/provide vegetation cover in disturbed areas with native plants</li> <li>Avoid disturbance on steep slopes;</li> <li>Avoid discharging water on unstable or steep slopes;</li> <li>Ensure vehicles drive on tracks;</li> <li>Encourage re-vegetation of slopes following completion of works</li> <li>Shaping/levelling disturbed areas , compact loose soil/materials</li> </ul>	Regular site inspections by contractor; Supervisor of community group; Inspections after heavy rainfall to check for scour, soil erosion or sedimentation	Weekly monitoring by HCC - WD PGDO	Repairs to damaged areas; re-establishment of vegetation; modify damage control measures as required
Inappropriate spoil/waste disposal	To remove and dispose of spoil and waste material regularly and <u>only</u> to designated areas	<ul style="list-style-type: none"> <li>Re-use spoil/cut wherever possible in other road repair activities;</li> <li>Waste and spoil stockpiles to be stored at least 100m from waterways;</li> <li>Protect excavated spoil and waste from erosion by covering and interception drains if left overnight;</li> <li>Rubbish stored in neat/tidy piles awaiting collection;</li> <li>Disposal of rubbish/waste only in approved dump sites</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly inspections by MID-TFPD; HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately
Safety risks for the public	To avoid safety risks for the children	<ul style="list-style-type: none"> <li>Make sure that no children enter the sites where construction is on-going</li> </ul>	Daily site inspections by	Weekly inspections by	record Any problems/complaints for

<b>ESMP 5 – FOOTPATH/STEP CONSTRUCTION</b>					
<b>Impact</b>	<b>Objective</b>	<b>Control measures to be implemented - safeguard activities</b>	<b>Monitoring &amp; reporting responsibility</b>		<b>Corrective action</b>
			<b>Doing</b>	<b>Checking</b>	
			contractor; community	MID-TPPD; HCC - WD PGDO	subsequent monitoring) and actions

ESMP 6 – DRAIN AND CULVERT CLEANING AND RUBBISH REMOVAL					
Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
Damage to adjacent land or legal structures/trees/crops or natural vegetation due to excavation of drain to specifications	To minimise damage to adjacent land or legal structures/trees/crops and to compensate for damages to legal structures or crops as per the LAPF	<ul style="list-style-type: none"> <li>Minimise area of disturbance along drain alignment;</li> <li>Work carefully in areas where structures or crops/trees are adjacent to drain</li> </ul>	Contractor; Supervisor of community group	Weekly inspections by HCC - WD PGDO	Any damages repaired or compensated as per provisions of the LAPF
Damage to vegetation/crops and siltation of waterways from unplanned spoil disposal	To reduce impacts on water quality and manage spoil disposal; To compensate for damages to crops or productive trees as per the LAPF	<ul style="list-style-type: none"> <li>Store spoil in selected place;</li> <li>Protect from erosion by covering and providing interception drains</li> </ul>	Daily site inspections by contractor/supervisor	Weekly monitoring by HCC - WD PGDO	Any damages repaired or compensated as per provisions of the LAPF
Dust generation; impacts on air quality; nuisance	To reduce impacts on air quality and nuisance; to ensure there is no health risk or inconvenience due to dust generation	<ul style="list-style-type: none"> <li>Spray water on exposed surfaces during dry periods;</li> <li>Ensure that vehicles carrying materials are either damped down or are covered with tarpaulin or similar;</li> <li>Ensure that any materials being transported by vehicle to the site are not carried in the open</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly monitoring by HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately
Pollution of water sources; degradation of water quality in streams and rivers	To avoid contamination/pollution of water sources from activities	<ul style="list-style-type: none"> <li>Rubbish stockpiles to be stored at least 100m from a waterway;</li> <li>Debris (organic material and earth cleaned from drains and culverts) to be stored at least 100m from a waterway;</li> <li>Re-use material where possible;</li> <li>Rubbish trucks will not be permitted to drive in stream or river beds and will not be parked adjacent to waterways while collecting rubbish;</li> <li>Accidental spills to be cleaned up immediately</li> </ul>	Daily visual assessment/ site inspections by contractor; Supervisor of community group;	Weekly monitoring by HCC - WD PGDO	Consult with local community using water sources to identify problems and remedial actions; Immediate addressing of water quality problems to satisfaction of community
Inappropriate spoil/waste disposal	To remove and dispose of spoil and waste material regularly and only to designated areas	<ul style="list-style-type: none"> <li>Re-use spoil/out wherever possible in other road repair activities;</li> <li>Waste and spoil stockpiles to be stored at least 100m from waterways;</li> </ul>	Daily site inspections by contractor; Supervisor of community	Weekly inspections by MID -TPPD; HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately

**ESMP 6 – DRAIN AND CULVERT CLEANING AND RUBBISH REMOVAL**

Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
		<ul style="list-style-type: none"> <li>Protect excavated spoil and waste from erosion by covering and providing interception drains if left overnight;</li> <li>Rubbish stored in neat/tidy piles awaiting collection;</li> <li>No burning or burying of rubbish;</li> <li>Disposal of rubbish/waste only in approved dump sites</li> </ul>	group		
Pollution or impacts on community from inappropriate rubbish disposal	To preserve residential amenity and protect the community from pollution or inappropriate rubbish disposal	<ul style="list-style-type: none"> <li>Rubbish stored in neat/tidy piles awaiting collection;</li> <li>No burning or burying of rubbish;</li> <li>Disposal of rubbish only in approved dump sites</li> </ul>	Daily site inspections by supervisor of community group	Weekly monitoring by HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately
Safety risks for the workers	To avoid safety risks for the workers	<ul style="list-style-type: none"> <li>Provide protective gears (hats, gloves, boots etc.) for the workers when working at risky sites</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly inspections by MID-TPPD; HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately

ESMP 7 – VEGETATION CLEARANCE					
Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
Removal of significant or shade trees	To consult with community to identify such trees and avoid removal if possible	<ul style="list-style-type: none"> <li>Work carefully in such areas;</li> <li>Avoid removal of mature trees where possible;</li> <li>Identify and protect such trees</li> </ul>	Supervisor of community group	Weekly inspections by HCC - WD PGDO	Community consultation
Damage or removal of legal gardens or crops from ROW	To minimise damage to adjacent legal trees/crops and to compensate for damages to legal gardens or crops as per the LAPF	<ul style="list-style-type: none"> <li>Minimise area of disturbance and vegetation clearance;</li> <li>Work carefully in areas adjacent to gardens;</li> <li>Consult with community prior to activities</li> </ul>	Contractor; Supervisor of community group	Weekly inspections by HCC - WD PGDO	Any damages repaired or compensated as per provisions of the LAPF
Inappropriate spoil/waste disposal	To remove and dispose of spoil and waste material regularly and <u>only</u> to designated areas	<ul style="list-style-type: none"> <li>Re-use spoil/cut wherever possible in other road repair activities;</li> <li>Waste and spoil stockpiles to be stored at least 100m from waterways;</li> <li>Protect excavated spoil and waste from erosion by covering and providing interception drains if left overnight;</li> <li>Rubbish stored in neat/tidy piles awaiting collection;</li> <li>No burning or burying of rubbish;</li> <li>Disposal of rubbish/waste only in approved dump sites</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly inspections by MID-TPPD; HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately
Damage to roadside vegetation	To minimise environmental degradation through vegetation removal	<ul style="list-style-type: none"> <li>Keep vegetation clearance to a minimum i.e. restrict to that necessary for road safety and improving sight distances etc;</li> <li>Encourage re-vegetation of slopes etc after repair activities have been completed</li> </ul>	Daily site inspections by contractor/ supervisor	Weekly monitoring by HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately



**ESMP 8 – PAVING, GREENING AND LANDSCAPING**

Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
Dust generation; impacts on air quality; nuisance from stockpiles of sand and dry cement	To reduce impacts on air quality and nuisance; to ensure there is no health risk or inconvenience due to dust generation	<ul style="list-style-type: none"> <li>Cover sand and dry cement, especially during dry periods;</li> <li>Ensure that vehicles carrying materials are either damped down or are covered with tarpaulin or similar;</li> <li>Ensure that any materials being transported by vehicle to the site are not carried in the open</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly monitoring by HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately
Accidental spillages of wet cement, or cement washings into the drains (and to the coast) during fabrication of paving stones or during concreting of areas in CBD	To prevent impacts on water quality and river/stream/coastal fauna (cement is highly toxic to fish and other aquatic animals)	<ul style="list-style-type: none"> <li>Construct off-site or establish clear separation of concrete batching works from any drainage to the waterway;</li> <li>Avoid spills of cement or disposal of excess mixed cement into waterway;</li> <li>Protect dry cement stocks from wind by covering with tarpaulin</li> </ul>	Daily visual assessment/ site inspections by contractor; Supervisor of community group	Weekly monitoring by HCC - WD PGDO	Consult with adjacent users or local community using water sources to identify problems and remedial actions; Immediate addressing of water quality problems to satisfaction of community
Pollution or impacts on community from inappropriate disposal of organic waste	To preserve urban amenity and protect the community from pollution or inappropriate spoil/waste organic material disposal	<ul style="list-style-type: none"> <li>Rubbish stored in neat/tidy piles awaiting collection;</li> <li>No burning or burying of rubbish;</li> <li>Disposal of waste and organic matter only in approved dump sites</li> </ul>	Daily site inspections by supervisor of community group	Weekly monitoring by HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately
Contamination and health risk from handling of herbicides and pesticides	To avoid exposure to harmful toxins and/or hazardous chemicals	<ul style="list-style-type: none"> <li>Project will not permit the use of herbicides and other chemicals</li> </ul>	Daily inspections by supervisor of community group	Weekly monitoring by HCC - WD PGDO	Sanctions imposed on contractors or groups using herbicides or chemicals
Inappropriate spoil/waste disposal	To remove and dispose of spoil and waste material regularly and <u>only</u> to designated areas	<ul style="list-style-type: none"> <li>Re-use spoil/cut wherever possible in other road repair activities;</li> <li>Waste and spoil stockpiles to be stored at least 100m from waterways;</li> <li>Protect excavated spoil and waste from erosion by covering and providing interception drains if left overnight;</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly inspections by MID-TPPD; HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately

**ESMP 8 – PAVING, GREENING AND LANDSCAPING**

Impact	Objective	Control measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
Safety risks for the workers	To avoid safety risks for the workers during execution of labour-based works, including attacked by insects	<ul style="list-style-type: none"> <li>Rubbish stored in neat/tidy piles awaiting collection;</li> <li>No burning or burying of rubbish;</li> <li>Disposal of rubbish/waste only in approved dump sites</li> </ul> <ul style="list-style-type: none"> <li>Provide safety gears for the workers to use as/when needed</li> <li>Warn the workers avoid approaching/disturbing bees or snakes, etc.</li> <li>Ensure that adequate warning signs and sign boards are installed at appropriate locations</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly inspections by MID-TPPD; HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately

**ESMP 9 –WATERWAY REHABILITATION**

Impact	Objective	Measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
Stone/rock extraction for gabion baskets	To minimise the impacts of sourcing materials from inappropriate locations	<ul style="list-style-type: none"> <li>Use already identified/approved quarries or rock/stone sources;</li> <li>Follow MID's Aggregate Extraction Guidelines (or similar);</li> <li>Consult with resource owners (trees) if wood to be cut and used for steps</li> </ul>	Inspections by contractor; Supervisor of community group	Weekly monitoring by MID-TPPD; HCC - WD PGDO	Sign MOU (covering royalties/compensation) with resource owners if new source identified
Damage to waterway, river bed and banks; downstream siltation; and change in downstream flows (increased velocity)	To reduce effects on local hydrology and prevent sedimentation of waterways	<ul style="list-style-type: none"> <li>Design works to minimise impact on waterways;</li> <li>Ensure that solid waste is not disposed of, or stored, on river bank or in downstream waterway;</li> <li>Minimise disturbance to river banks to avoid destabilisation;</li> <li>Consider present flow rates and assess new flow rate after culvert;</li> <li>Check for downstream vulnerabilities to higher flows</li> </ul>	Daily visual assessment/ site inspections by contractor; Supervisor of community group;	Weekly monitoring by MID - TPPD; HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately
Inappropriate spoil/waste disposal	To remove and dispose of spoil and waste material regularly and <u>only</u> to designated areas	<ul style="list-style-type: none"> <li>Re-use spoil/cut wherever possible in other road repair activities;</li> <li>Waste and spoil stockpiles to be stored at least 100m from waterways;</li> <li>Protect excavated spoil and waste from erosion by covering and providing interception drains if left overnight;</li> <li>Rubbish stored in neat/tidy piles awaiting collection;</li> <li>Disposal of rubbish/waste only in approved dump sites</li> </ul>	Daily site inspections by contractor; Supervisor of community group	Weekly inspections by MID-TPPD; HCC - WD PGDO	Any problems/complaints to be recorded (for subsequent monitoring) and acted upon immediately
Contamination impacts from accidental fuel/oil spills or leaks from machinery or stores	To prevent contamination and reduce risk of accidental spills	<ul style="list-style-type: none"> <li>If machinery is used: (i) vehicle, machinery, and equipment maintenance and refuelling will be carried out so that any spilled materials do not seep into the soil; (ii) fuel storage and refilling areas will be located at least 50 m from</li> </ul>	Daily visual assessment/ site inspections by contractor; Supervisor of community	Weekly monitoring by MID - TPPD; HCC - WD PGDO	Consult with local community using water sources to identify problems and remedial actions; Immediate addressing of problems to

ESMP 9 –WATERWAY REHABILITATION					
Impact	Objective	Measures to be implemented - safeguard activities	Monitoring & reporting responsibility		Corrective action
			Doing	Checking	
Erosion of excavated material and stockpiles leading to siltation of waterways	To minimise erosion and subsequent effects on waterways and adjacent land uses	<ul style="list-style-type: none"> <li>Re-use spoil/cut wherever possible in other road repair activities;</li> <li>Protect excavated spoil from erosion by covering and providing interception drains if left overnight;</li> <li>Minimise area of disturbance</li> </ul>	Regular site inspections by contractor; Supervisor of community group; Inspections after heavy rainfall to check for scour, soil erosion or sedimentation	Weekly monitoring by MID – TPPD; HCC - WD PGDO	Repairs to damaged areas; re-establishment of vegetation; modify damage control measures as required
Accidental spillages of wet cement, or cement washings into the river (if in parallel with other works)	To prevent impacts on water quality and river/stream fauna (cement is highly toxic to fish and other aquatic animals)	<ul style="list-style-type: none"> <li>Construct off-site or establish clear separation of concrete batching works from any drainage to the waterway;</li> <li>Avoid spills of cement or disposal of excess mixed cement into waterway;</li> <li>Protect dry cement stocks from wind by covering with tarpaulin</li> </ul>	Daily visual assessment/ site inspections by contractor; Supervisor of community group	Weekly inspections by MID-TPPD; HCC - WD PGDO	Consult with local community using water sources to identify problems and remedial actions; Immediate addressing of water quality problems to satisfaction of community
Safety risks for the workers	To minimise health risks and avoid safety risks for the workers , for example broken glass in the waterway	<ul style="list-style-type: none"> <li>Provide safety gears for the workers to use as/when needed</li> </ul>	Daily site inspections by contractor; Supervisor of community	Weekly inspections by MID-TPPD; HCC - WD PGDO	Record Any problems/ complaints for subsequent monitoring) and actions

## Appendix 2 – Relevant Legislation

### The Environment Act and Regulations

The Environment Act 1998 (the Act) and Environment Regulations 2008 (the Regulations) make provision for the conservation and protection of the environment. The Act provides for an integrated system of development control, environmental assessment and pollution control including; prevention, control and monitoring of pollution including regulating discharge of pollutants to air, water or land and reducing risks to human health and prevention of degradation of the environment; Regulating the transport, collection, treatment, storage and disposal of waste and promoting recycling, re-use and recovery of materials in an economically viable manner; and Complying with, and giving effect to, regional and international conventions and obligations relating to the environment.

The Second Schedule of the Act lists prescribed developments for which consent from the Environment and Conservation Division (ECD), accompanied by an environmental assessment reported as either a public environmental report (PER) or an environmental impact statement (EIS), is required. Reorganization of the national government structure in December 2007 led to the creation of a Ministry of Environment, Conservation and Meteorology (MECM), which as at 2017 has become the Ministry of Environment, Climate Change, Disaster Management and Meteorology (MECDM). Within the MECDM, the Environment and Conservation Division (ECD) is responsible for ensuring the environmental sustainability of development proposals.<sup>9</sup>

All prescribed developments require a “screening” or “scoping”, to see what form/level of environmental assessment is required. Most prescribed developments require a PER, while major projects such as logging, mining, or large scale tourism or infrastructure developments, will need a more detailed appraisal which includes technical, economic, environmental and social investigations and consultations with stakeholders, presented in an EIS.

The Environment Act has considerable power by virtue of article 4 (1) which states that in the event of conflict between the Act and other acts, the provisions of the Environment Act shall prevail.

The Regulations extend the requirements of the PER/EIS to include; (a) social impact on the surrounding communities; (b) ensuring public participation; (c) spelling out employment opportunities for Solomon Islanders; (d) a demographic impact assessment; (e) health impact assessment; (f) gender impact assessment; (g) noise impact assessment; (h) state whether any of the above would have short- or long-term harmful effects on the environment. The Director may have other requirements that will need to be fulfilled, notifying applicant of any additional requirements within 31 days after notifying the applicant.

The existing Solomon Islands EIA Guidelines for Planners and Developers (May 1996) pre-date the Environment Act and are not legally binding. In the Second Schedule the Act lists prescribed developments for which consent accompanied by an EIA are required. All prescribed projects require a simple assessment through a “screening” or “scoping”, to see what form of additional assessment is required. Most prescribed projects require a PER, while many major projects such as logging, mining, large scale tourism developments, and infrastructure projects will also need a second stage of appraisal which include technical, economic, environmental and social investigations presented in an EIS report.

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<sup>9</sup>Solomon Islands Government MECDM. Development Planning.  
<http://www.mecdm.gov.sb/environment/development-planning.html>

In respect of activities to be undertaken during CAUSE, prescribed activities include; (2) Non-metallic industries: (d) extraction of aggregates, stones or shingles; and (9) Public works sector: (b) infrastructure development; (d) soil erosion and silt control; and, (h) waste management, drainage, and disposal systems.

There is also provincial regulation promulgated under the Provincial Government Act 1997 that provides for provinces to create their own legislation in respect of environment and conservation.<sup>10</sup>

### **Development Consent Applications**

Using Form 1 (as set out in Section 17 of the Act) send a written application to the Director of ECD. This must be accompanied by a standard fee and must include all of the information requested, and requiring a ruling on the type of environmental assessment that will be required (PER, EIS or waiving of the requirement).<sup>11</sup> This determination can be used for planning the studies and data collection required for the assessment. The letter may also request approval of the person(s) being nominated to prepare the PER or IEE (include their CV highlighting their experience with environmental assessments and preparing such reports). Within 30 days the Director of ECD will reply to advise of the final requirements for the assessment of the development.

If an EIS is required, the Director will organize a Public Meeting allowing at least 30 days for people to access the reports, in order to discuss results of the assessments and hear objections from those that attend. For a PER, no public meeting is required. Within 14 days of the Public Meeting, or publication of a PER, the Director will issue a Development Consent, with or without conditions, or decline the application for development consent. The Director issues the Development Consent, if satisfied that all requirements will be met, using Form 5. This may be subject to additional conditions of implementation set by the Director. The Development Consent will require the deposit of an environmental bond of a sum to be determined by the Director. The developer will bear all costs associated with mitigating any adverse environmental impacts, and may also be charged for the monitoring requirements attached to the development consent. Costs incurred by ECD of monitoring a development will be paid to ECD by the applicant for an Environmental Inspector, or according to the costs charged by an external person or body.

Conservation efforts in Solomon Islands have been strengthened through the principle of ecosystem management puts forward that biodiversity should be managed at the ecosystem level, the Protected Areas Act 2010 and the Protected Areas Regulations 2012 are the country's key conservation legislations. These are supported by the Environment Act 1998 and the Wildlife Protection and Management Act 1998 and their respective Regulations. Together they give natural assets such as wildlife species, coral reefs and rainforests the legal status they need to be protected from harmful human activities and interests.

At the International level, conservation efforts are encouraged by Multilateral Environmental Agreements (MEAs) such as the United Nations Convention on Biodiversity (UNCBD) and supported by other United Nations conventions such as the Convention Concerning the Protection of the World Cultural and Natural Heritage and the United Nations' Sustainable Development Goals (SDGs). These instruments have led to an increasing focus on the importance of natural habitats, in line with the Bank's Safeguard Policy 4.04.

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<sup>10</sup> Provincial regulations are particularly effective where they provide for community based resource management and/or address any gaps or weaknesses in national legislation such as protected areas.

<sup>11</sup> The ESMG Report and draft ESMGs will be submitted to ECD for review and environmental clearance of the REP.

## **Land and Titles Act**

The Land and Titles Act (1988 and amended in 1996) is the legislation that consolidates the law relating to the tenure of land, registration of interests in land, and compulsory acquisition of land. Part V of the Act deals with the purchase or lease of customary land by private treaty, and compulsory acquisition of land. Acquisition of customary land is usually only undertaken for non-public works such as gold mines, oil palm plantations, or hotels. For public works requiring location on customary land, MID, Solomon Islands Electricity Authority, and Solomon Islands Water Authority (SIWA) typically consult with the members of a line and any other person who claims an interest in the land. For public works the land is not acquired as such, it is gifted or contributed following an extensive period of consultation and agreement through signing of a Memorandum of Understanding (MOU). The MOU waives the customary interest in the land in lieu of the public infrastructure (wharves, roads, schools, clinics and other public utilities).

Two articles of the Constitution also provide for compulsory acquisition. Article 111 which states that in regard to land which has ceased to be customary land, Parliament may; (i) provide for the conversion into a fixed-term interest of any perpetual interest in such land held by a person who is not entitled to hold such a perpetual interest (as defined by Article 110); (ii) provide for the compulsory acquisition where necessary of such land or any right over or interest in such land; and (iii) prescribe the criteria to be adopted in regard to the assessment and payment of compensation for compulsory acquisition (which may take account of, but need not be limited to, the following factors: the purchase price, the value of improvements made between the date of purchase and the date of acquisition, the current use value of the land, and the fact of its abandonment or dereliction). In respect of customary land, in Article 112, the Constitution, allows the compulsory acquisition of customary land or any right over or interest in it, as long as there have been negotiations with the owner(s) of the land, right or interest prior to the acquisition, the owner(s) have a right of access to independent legal advice, and the interest in the acquired land is limited to a fixed-term interest.

There are three aspects of the Land and Titles Act that differ from the Bank's Safeguard policies. Sections 71 through 85 of the Act deal with land acquisition for public purposes and sections 184 through 190 set out the requirements for public ROW. The legislation does not cover project-affected people (PAPs) without title or ownership records, such as informal settlers/squatters (non-titled PAPs) or people with illegal structures or gardens (encroachments) in the ROW.<sup>12</sup> These differences are covered in more detail in Appendix 4.

## **Local Planning Schemes**

The land and Planning Act 1980 outlines the administration of town and country planning in the Solomon Islands, the making of local planning schemes, the control and development of land and outlines the role of the Planning and Development Boards. It requires the preparation of Provincial Plans and Town Planning schemes for the purpose of ensure that registered land in Solomon Islands is developed and used in accordance with properly considered policies that are formulated on adequate information and are directed to promote the welfare of the inhabitants of Solomon Islands.

The MOLHS with support from development partners has been instrumental in preparing a series of Land Use Planning Schemes that will govern development in the main urban centres. Local Planning Schemes are now in place for Honiaria (2015), Auki (2017), Gizo (draft 2017) and Henderson (draft 2017). Once gazetted these plans provide a legal

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<sup>12</sup> As noted previously, in the event that land lease resumption and compensation for assets is required and government policies and practices allow for compensation, then the procedures outlined in this LAPF will be applied. In the event that government policy does not compensate for land lease resumption (for instance, when structures have been illegally erected) then the sub-project activity would be deemed ineligible for funding under the Project.

framework to guide development activities. There is currently a Greater Honiara Urban Development Strategy and Action Plan (GHUDSAP) underway for the linkages between Honiara and the wider Guadalcanal province. This is a strategic plan that will consider long term development priorities for the target area and the implications for wider development of the Solomon Islands.

### **Labour Laws**

The LABOUR ACT (1996) CHAPTER 73 governs rules relating to employment. The Act defines the allowable hours of work and minimum wages. It outlines workers rights and employers penalties for not complying with the requirements. It includes a prohibition for women working at night and for child labor.

As noted in the community consultation section, there were concerns, particularly in Auki in relation to women working out of daylight hours and the project attempts to enforce this rule. In line with the Act and for safety reasons, night work should not be permitted. In addition, the project should maintain the requirement for all workers to be over the age of 16 years of age.



## Appendix 3 – Land/Asset Acquisition Policy Framework

### Introduction

**CAUSE Objectives and Components.** The CAUSE project's development objectives are to "improve socio-economic opportunities and conditions for vulnerable, urban populations through the delivery of basic infrastructure and services."<sup>13</sup> Building on REP's three components, CAUSE will have three program components and one administrative component:

- (i) **Component 1: Urban Works and Services**, executed by HCC in coordination with the GP, MP and WP governments, will prioritize the delivery of a range basic infrastructure and services in the waste management and transport sectors implemented by local community groups and contractors through sub-grants and contracts. It will consist of two sub-components: (1a) *Community-Access Infrastructure* which will focus on enhancing community access and strengthening connectivity to transport links to basic social and economic services; and (1b) *Waste Management Services* will focus on the collection, recycling and increasing awareness on waste as well as ensuring that the garbage collected under the project is well integrated with other back-end services supported by the provincial authorities, such as the transportation and land filling of waste.
- (ii) **Component 2: Road Repair and Maintenance**, executed by MID in coordination with the GP, MP and WP governments, will deliver civil works contracts in road maintenance, improvement and drainage provision, implemented by small to medium sized contractors. It will consist of two sub-components: (2a) *Routine Road Maintenance*, which will deliver road maintenance contracts; and (2b) *Road Improvement and Rehabilitation*, which will deliver road improvement contracts; and two drainage contracts.
- (iii) **Component 3: Infrastructure and Service Delivery Training (ISDT)**, will strengthen the knowledge and capacity of individuals and contractors to understand the project's procedures and access project benefits directly linked to labor-based activities funded by the project. The training will build upon the current PET course that includes: basic life skills; occupational health and safety; basic financial literacy; help to improve the knowledge and skills of beneficiaries with regard to labor-based construction and service delivery methods; and contracting and payment arrangements. Certain modules may only apply to contractor staff and community groups that aim to take up contracting.
- (iv) **Component 4: Project Management.** The project will finance additional project management support, including safeguards oversight, communications & media support, short-term technical assistance, training, financial management and procurement, and additional project staff, goods, and operational costs. Small, Project Implementation Units (PIUs), essentially satellite offices to the Project Management Unit PMU office in Honiara, will be setup to support project delivery in Western and Malaita Provinces. The PMU will continue supporting HCC, and MID project delivery in and around Honiara, as well as project locations in GP. As part of the project's impact evaluation, baseline and follow-up surveys of communities, participants, and contractors will be carried out to measure key outcome indicators in areas participating in the project.

The activities under Component 2 will include repair and rehabilitation of selected roads within Honiara City Council (HCC) provincial urban boundaries and which fall under the responsibility of Ministry of Infrastructure Development (MID). Such activities will be largely conducted within existing rights of way (ROW), being 10m in width for access/spur roads and 20m in width for connector/main roads, therefore impacts from land acquisition will be minimal. In respect of activities on roads it is possible that strip acquisition could be required in some cases to (i) provide for the full ROW or to construct or widen drains; (ii) the incidental (temporary) effects of construction; and (iii) clearing of ROW to original designs. For Component 1 works, land acquisition could be triggered by the need for strips of land to provide for the construction of footpaths or steps. The potential number of households that may be affected through such impacts is small and within the category of "minor" according to WB safeguard policy.<sup>14</sup>

This Land/asset Acquisition Policy Framework (LAPF) outlines the policy principles, procedures, and institutional arrangements to ensure that if land/asset acquisition needs are identified, the project Executing Agencies (EAs) follow the procedures for acquisition in compliance with the Government's applicable laws and regulations, and also comply with the requirements of WB's safeguard policy (OP 4.12), and the agreed ESMF for the Project. Land/asset acquisition will be covered accordingly during implementation through the ESMFs.

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<sup>13</sup> Solomon Islands/World Bank Community Access and Urban Services Enhancement (CAUSE) Project. Preparation Mission July 17-27, 2017. *Draft Aide-Mémoire*.

<sup>14</sup> According to WB's safeguard policy covering resettlement – OP 4.12 – resettlement is defined as any impacts associated with the loss of land or assets or the loss of access to, or use of, land. Impacts are considered "minor" if the affected people are not physically displaced and less than 10% of their productive assets are lost.

## Land Tenure and Management

Traditional land and resource management in Solomon Islands is community based, some 87% of land is under customary resource tenure and all natural resources i.e. forests, minerals, reefs, and islets belong to customary land owners.<sup>15</sup> The remaining land is considered “alienated” and is subject to registration under the Land and Titles Act 1988. Table 1 provides a summary of land tenure categories and prevalence.

Table1. Land Tenure Descriptions

Land Tenure Categories	Description	Prevalence <sup>16</sup>
<b>Customary Land</b>	Every member of this landholding entity, such as a tribe, clan, or family, is vested with the rights to use and access it. Land ownership claims are made through reference to custom, ancestors and lineages, the whereabouts of boundary markers, and the whereabouts of sacred (tambu) places. Non-owners have limited rights. There is no formal statutory process for accessing local infrastructure customary land. There is often no systematic authoritative record of customary ownership or tribal land boundaries. <sup>17</sup>	Accounts for the majority of land in the Solomon Islands (80-90%).
<b>Public Land</b>	Also known as government, crown, or state land, it can be leased for either residential or commercial purposes. Pressures of urbanization have resulted in some encroachment of settlement into public lands.	Most land in Honiara and the town areas the project will be working in is public land. . Almost all of the commercial agricultural land in Solomon Islands is publicly owned.
<b>Private Land</b>	A small proportion of land in Solomon Islands is freehold title, or fully privately owned in a perpetual estate. Until 1912, it was possible for foreigners to purchase freehold land directly from Solomon Islanders. Solomon Islanders who have a title in either a registered perpetual or fixed-term estate can transfer the proprietary interest during their lifetime or by will. <sup>18</sup> Such persons can also lease their estates to a Solomon Islander for any specified period, or to a foreigner with written consent from the Land Board. In 1977, all perpetual ownership by foreigners was abolished and all perpetual estates in land were converted automatically to fixed-term estates of seventy-five years (leased as crown land).	Approximately 2% of land within the Solomon Islands is leased by foreigners.

Within HCC boundaries (i.e. the town boundary) all land is owned by the state and is held in Perpetual Estate Title on behalf of SIG by the Commissioner of Lands (COL). The COL enters into 50 year Fixed Term Estate (FTE) agreements with individuals or shorter term Temporary Occupancy Licences (TOL).

A TOL is valid for a period of one to two years, and permanent structures or improvements are not permitted on this land. As can be seen from Table 2, most of the land within Honiara is under FTE arrangements.

**Table 2. Land Area by Lease Arrangements within HCC**

Ward	Area of land by land classification (km <sup>2</sup> )		
	Commissioner of Lands land	Fixed term estate land	Temporary occupation license land
Cruz	0.4	0.4	0.0
Kola'a	4.8	3.9	0.9
Kukum	0.3	0.3	0.0
Mataniko	0.9	0.8	0.1

<sup>15</sup> Exemptions being the lands of the federal capital area (Honiara) and provincial headquarters.

<sup>16</sup> ADB (2016). Solomon Islands Urban Sector Assessment.

<sup>17</sup> Solomon Islands Government/World Bank. (2017) EMSF.

<sup>18</sup> Corona (2004) Private Lands Conservation in the Solomon Islands.

Ward	Area of land by land classification (km <sup>2</sup> )		
	Commissioner of Lands land	Fixed term estate land	Temporary occupation license land
Mbumburu	1.2	1.2	0.0
Naha	0.1	0.1	0.0
Ngossi	4.0	3.5	0.5
Panatina	7.6	7.1	0.5
Rove/Lengakiki	1.1	1.1	0.0
Vavaea	1.6	1.5	0.1
Vuhokesa	0.3	0.3	0.0
Vura	2.2	2.1	0.1
HCC Total	24.5	22.2	2.3

Source: Ministry of Lands – Valuation Division (2010)

### Land Tenure Considerations in the Solomon Islands

Most land in Solomon Islands is still held under customary tenure, where every member of a landholding entity, such as a tribe, clan, or family, is vested with the rights to use and access it. Non-owners usually have limited rights (usufruct rights), such as right of use, easement, or right of way. Gizo island has been declared as a property of the state, rather than the usual customary ownership prevalent in much of the rest of the Solomons. The majority of Auki is customary land which means land that is not freehold, alienated, registered or owned by the crown. However, a small portion (106km<sup>2</sup>) is owned by the government. Munda is also mainly customary land with a small part owned by the Government. In Guadalcanal the Henderson area is Government owned while the vast majority of the remainder is customary land.

Currently covered by REP within the context of Honiara, Panatina ward is an area known as Burns Creek, which is predominantly under TOL arrangement, and covers an area of 0.0309 km<sup>2</sup>. While this area is immediately outside of the town boundary, and falls under the jurisdiction of Guadalcanal Province, it is issued to the COL under perpetual estate title.

In the Solomon Islands, non-owners have limited rights making it difficult to plan and develop infrastructure, services and urban expansion. There is no formal statutory process for accessing local infrastructure on customary land, although customary processes acknowledge the personal ownership of assets, regardless of the land ownership of where the asset is situated. Yet, there is often no systematic authoritative record of customary ownership or tribal land boundaries.<sup>19</sup> Pressures of urbanization and challenges of land allocation have resulted in informal land settlements and contested land ownership. In general, the CAUSE project will not face these issues as it will prioritize communities where land issues have already been resolved and if any land transfer is required, it will be through voluntary deed of donation.

## POLICY FRAMEWORK AND ENTITLEMENTS

### Legal and Policy Context

As noted above the current legislation governing land acquisition for public or development purposes is the Land and Titles Act. Sections 71 through 85 of the Act deal with land acquisition for public purposes and sections 184 through 190 set out the requirements for public ROW. The legislation does not cover project-affected people (PAPs) without title or ownership records, such as informal settlers/squatters (non-titled PAPs) or people with illegal structures or gardens (encroachments) in the ROW.<sup>20</sup>

For improved land, the Act provides for compensation to be paid (i) in the form of rental for any land used or occupied on a temporary basis; or (ii) for permanent acquisition of the land. Compensation is assessed on such things as the condition of the land, use of the land, and impact on the value of contiguous land, and can

<sup>19</sup> Solomon Islands Government/World Bank. (2017) EMSF.

<sup>20</sup> In the event that land lease resumption and compensation for assets is required and government policies and practices allow for compensation, then the procedures outlined in this LAPF will be applied. In the event that government policy does not compensate for land lease resumption (for instance, when structures have been illegally erected) then the sub-project activity would be deemed ineligible for funding under the Project.

be provided in two ways; (i) if requested by the lease-holder, an FTE can be granted for an alternative parcel of land; or (ii) cash compensation based on the valuation of the land plus the improvements.

The valuation is based on the current value of parcels of land for similar uses in the area and the current rent for similar FTE arrangements. This is considered to constitute current market value/replacement cost as envisaged in OP 4.12.

For unimproved land, the compensation negotiated is based on the original lease price plus reimbursement of all rent payments made up to the time of the resumption.<sup>21</sup>

While the Act includes a provision for interest to be paid it is not free of taxes or other deductions, as required under WB's policy. Furthermore, the legislation does not take account of the social and economic consequence of land acquisition in terms of restoration of lost income. Thus, owing to three main differences between the Act and WB's safeguard policy OP 4.12 (involuntary resettlement), the provisions in this project-specific LAPF will be adopted.<sup>22</sup> The acquisition procedural guideline stipulations contained in this document will apply to all subprojects to be prepared and approved under the Project. Table 3 sets out the differences between the Act and OP 4.12 and identifies what types of remedial measures would be needed to fill the gaps.

**Table 3 – Comparison of SIG Law and OP 4.12**

<b>SIG Law Provisions</b>	<b>OP 4.12 Provisions</b>	<b>Remedial Measures</b>
Does not require publication of information about acquisition/resumption of leases and entitlements	Disclosure of project information and documents (incl. acquisition process and compensation) and broad based community consultation required	ESMG report (incl. LAPF) to be disclosed on WB's website, made available for public perusal at MID and HCC offices. Summary of LAPF and ESGMs to be made available in English and/or Pidgin on request.
Compensation does not cover taxes or other deductions	All transaction costs associated with acquisition to be included in compensation award, i.e. there should be no cost to PAP	Compensation should include amounts due for taxes and any other costs associated with the transfer/ or acquisition.  No cost should be borne by the PAP of land acquisition.  A deed of donation and willing waiver of compensation is documented and signed by PAP (resumption of land/negation of lease in part or in entirety)
Does not provide for compensation for structures if they are illegal or encroaching	Compensation and other forms of assistance to be provided for non-titled PAPs and PAPs with encroaching or illegal structures	Subprojects with illegal or encroaching structures in the ROW will be ineligible for project inclusion.
Does not provide for lost income or livelihoods resulting from acquisition of land or assets	Livelihoods to be restored to at least pre-project conditions	Additional measures as required to ensure that PAP's livelihood is restored and any impacts from lost income are mitigated.

### **CAUSE Processes and Procedures under the LAPF**

The LAPF reflects the SIG's land acquisition laws/regulations and WB's policy on land/resource acquisition and best practice notes and guidelines. It stipulates eligibility and provisions for compensating all types of losses (land, crops/trees, structures, business etc). All PAPs and households should be compensated for lost legal assets (crops, structures, trees and/or business losses) and should receive (i) compensation at replacement value (either cash at market value or a fair and equitable trade for an alternative parcel of land), and / or (ii) replacement seedlings, other assistance such as shifting allowance, assistance with rebuilding structures, compensation for loss of workdays/income due to dislocation.

Acquisition of alienated land follows the procedure for acquiring alienated or registered land established in the Land and Titles Act. The process is more straight-forward than that of dealing with customary land. This process is essentially a transaction between the COL, through an Acquisition Officer and Valuation Officer

<sup>21</sup> This is in effect an incentive for lease-holders to make improvements to the land within the contract period (i.e. 12 months for residential land and 18 months for commercial land). FTE agreements are made on the basis that the FTE holder will be making improvements to the land.

<sup>22</sup> This LAPF is based on similar frameworks already approved/endorsed by SIG for other projects currently being implemented by MID (SIEAP and SIRIP).

(from the office of the Valuer General plus an independent valuation from a privately registered valuer) and the land-owner.

Acquisition of any land from within the HCC boundaries in effect will constitute a resumption of an FTE lease (in whole or in part). All FTE agreements are based on a contract which contains a specific clause stipulating that the COL may resume, for public purposes, part, or all, of the parcel of land covered by the lease,<sup>23</sup> and will follow the process set out in the Lands and Titles Act.

This would require a letter from MID or HCC to COL setting out the details of the land required, the purposes for which it is required, and a request for COL to resume the land to Perpetual Estate Title for the purposes set out in the letter. COL will review the application, and with the Planning and Survey Divisions will survey and demarcate the area required. Following consultations and negotiations with the FTE holder, the COL will issue a letter of resumption, to which the title-holder responds, and the process for agreeing the compensation is commenced.<sup>24</sup>

MID has a process in place for “acquisition” of customary land for public purposes and this includes consultation with the members of the land owning line and any other person who claims an interest in the land. For public works the land is not acquired as such, it is gifted or contributed following an extensive period of consultation and agreement through signing of a Memorandum of Understanding (MOU). The MOU waives the customary interest in the land in lieu of the public infrastructure (wharves, roads, schools, clinics and other public utilities).

Exceptions are projects funded through international aid assistance where the donor agency has insisted on registration of the land, which in effect alienates land from customary ownership and must go through (i) a customary process for identifying those with an interest in the land; and (ii) the process established in the Land and Titles Act. This procedure is set out in Annex 1, however it should be noted that this process will not be relevant for any land affected under the CAUSE because a pre-condition for any sub-project will be that it is either government owned alienated land or covered by a deed of donation to the appropriate government agency.

If required, land/asset acquisition actions required will be prepared in accordance with WB’s OP 4.12 (and Annexes). It is likely that any impacts and losses are anticipated to be minor therefore abbreviated plans<sup>25</sup> as part of the ESMP. Inventory and entitlement forms for project affected persons or communities (see Annex 4) should be prepared. The process for completion of the forms will be conducted in a participatory manner with the designated community/ household leaders working with the EAs/CLOs to estimate the potential losses and impacts. The ESMP will also include measures to ensure that socio-economic conditions, needs, and priorities of women are identified, and to ensure that land/resources/asset acquisition does not disadvantage women.

Any need for action on land/asset acquisition will be identified through completion of the Land/asset Acquisition (LA) Screening Form (Annex 1). Completion of the LA Screening Form, will assist the project to ascertain the eligibility of “subprojects”. Subprojects that will not be supported by CAUSE are outlined in the list of prohibited subprojects (see Annex 2).

Any segments of an eligible subproject that trigger land/asset acquisition will follow the guidelines and process set out in this LAPF in respect of identification of PAPs, compensation mechanisms, consultation, and preparation and implementation of the ESMP.

For instance, while the roads to be included in the project are known, the segments which will be the subject of works (i.e. subprojects) under the project are not known, and thus any issues of land and asset compensation required for the purposes of the Project can not yet be identified. In the event that compensation for land/assets is required and government policies and practices allow for compensation, then the procedures outlined in the LAPF consistent with Bank policies will be applied. In the event that government policy does not cover compensation (for instance, when structures have been illegally erected) and no negotiated agreement can be reached with the PAP then the sub-project activity would be deemed ineligible for funding under the Project.

The ESMG will include a budget for implementation identifying where the funds will come from and an implementation schedule linked with the proposed activities. Any works/activities will not commence until compensation has been awarded to PAPs as outlined in the ESMP. Compensation for relinquishment of leases will be at current market value/replacement cost, and compensation for crops, trees and structures will be determined based on published rates from relevant government agencies (as set out in Section VI after

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<sup>23</sup> The rent payable for FTEs is very low compared with the “real estate” value of the land because of the possibility that COL may resume the land, on behalf of SIG, for public purposes.

<sup>24</sup> Similar to the process for acquiring free-hold land, this is based on the valuation by the Valuer General and an independent valuation from a private sector and registered value.

negotiation with the PAPs) with additional grants as required to ensure market value. For land or assets that are donated, the PAP must sign a voluntary land/asset commitment form and declaration of consent for the specific works to proceed. (See Annex 3 and 4)

The ESMPs will be reviewed by the EAs (MID or HCC) and submitted to WB for endorsement. Prior review of the first subproject that requires land acquisition under Sub-component 1.a and Sub-component 2.b.

### Entitlements

Those PAPs with FTEs should receive compensation either for (i) the value, as negotiated between COL and the lessee, of the resumed land based on the current value of the land as if it were to be offered through lease to another party (as per the standard SIG process); or (ii) an alternative FTE lease i.e. land-for-land. Households headed by women and other vulnerable households should be eligible for assistance to fully mitigate project impacts through ensuring that at least two members of those households (one male and one female) are offered PET and employment under the Project.

Table 4 presents the project's entitlement matrix, based on potential losses. Note: This is consistent with OP4.12 (footnote 11) and continues the current REP project approach where the government (EA) is responsible for compensation awards and these are not covered by project funds. Therefore Table 4 below outlines the recommended guideless to be followed for CAUSE program implementation. This may be subject to further negotiation during project approval processes.

**Table 4 –Entitlement Matrix**

Impact/Type of Loss	Application	Definition of People Affected	Entitlement	Expected Results
Loss of use of land through temporary occupation by the Project	FTE land within the ROW required for use during repair/rehabilitation activities	Lease-holder	Rent, as agreed between the Project and lease-holder, for an agreed term (time period)	Compensation for loss of use of, access to, land for the defined period
Permanent loss of use of land (residential or commercial)	FTE land within the ROW to be resumed for the project	Lease-holder	Cash compensation as agreed between COL and lease-holder; OR New FTE lease for alternative land, with no cost to PAP for relinquishing original lease or processing alternative lease	Compensation for the current value of the lease to lease holder
Loss of gardens, trees, crops, perennials, and/or productive trees/plants	Standing crops, trees in the ROW	Owner(s) of crops or trees	Compensation at scheduled rate (current market value) by the Forest Division for timber trees and the Department of Agriculture for crops or productive plants/trees	Compensation for standing crops and trees
Partial or total removal of legal structure (house or commercial structure)	Legal structures i.e. with building permits/approval under the Building Ordinance (residential or commercial) in ROW	Owner of legal structure	Compensation for structures affected or removed at replacement value without deductions for salvaged materials; and assistance from the Executing Agencies in locating suitable alternative housing or commercial building; Shifting allowance <sup>26</sup> for relocating household or business goods and support while re-establishes	Compensation for loss of legal dwelling and/or commercial structure

<sup>26</sup> The shifting/relocation allowance will be agreed between the EAs and the household/PAP on a case-by case basis. The shifting allowance will be adequate to cover (i) dismantling of the structure; (ii) transport of structure/housing materials salvaged and all household effects/commercial goods; and (iii) costs of alternative accommodation, if required, while the structure is being re-built.

Impact/Type of Loss	Application	Definition of People Affected	Entitlement	Expected Results
Affected vulnerable households	Vulnerable households on the ROW and losing legal assets to the project	Vulnerable households identified through consultation with community leaders (households headed by women, elderly, disabled, poor households, and relocating households)	PET and “rolling” employment under the project for at least two household members (one male and one female) aged between 15 and 29 years	Livelihood stabilization
Displacement of community structure	Community structure on the ROW, if removed for project interest	Community representatives as identified through consultation and confirmation by community leaders	Replacement as agreed with community or cash compensation under law with additional grants as required to meet replacement value without deductions for any materials salvaged Assistance from the EA with dismantling and reconstructing structure or property	Restoration of community structure for common benefits
Unforeseen or unintended impacts	Any impact identified at design stage	Concerned affected people	Determined as per the spirit of this LAPF	No impact is left unmitigated.

### INSTITUTIONAL RESPONSIBILITIES

The ESMPs will be prepared by either MID or HCC, depending on the nature of the activities causing the acquisition. This means that each of the EAs will need to identify a person with the CAUSE project management structure as responsible for safeguards implementation (refer to the ESGM). Both the MID and HCC management structures for the project include a Community Liaison Officer (CLO) in each project location who will also be responsible for social safeguards including facilitating consultations and preparation of land acquisition.<sup>27</sup>

With assistance from Ministry of Lands - COL (and relevant divisions), the EAs will identify the land and leaseholder, undertake consultations, undertake a screening survey, and prepare the ESMP and proposals for land/asset acquisition activities.

During the process, the EAs will ensure that entitlements and mitigation measures are consistent with this LAPF; and suitable budgetary provisions are made for timely implementation. Depending on the nature of assets to be acquired other government agencies will be involved in establishing compensation rates. There are scheduled rates for base rates but consultation and negotiation are also involved in fixing compensation awards, this is especially important in respect of assets on the leased land.

The valuation of all improvements to land covered by an FTE is done through the Valuer General's office, with assistance from relevant other Ministries as required. For removal of crops and trees, compensation will be based on the published schedules of Ministry of Agriculture (Agricultural Extension Division) for root crops and tree crops and Forestry Division – Commercial Section for plantation trees and wood/timber trees. The rates for root crops are based on value of product per m<sup>2</sup> and tree crops are valued according to age, size and productivity of individual trees. MID has also agreed compensation for certain types of trees and crops on other projects, and these should be used as the starting point for negotiations under the CAUSE. Staff must complete a Voluntary Deed of Donation Form or Declaration of Consent Form (Annex 5 & 6) with valid signatories.

Structures (houses and commercial structures), if any are affected, are valued through the Ministry of Lands, Housing and Survey (Housing Division). Government or state buildings are valued according to condition and vary from \$700/m<sup>2</sup> for poor condition buildings to \$2,800/ m<sup>2</sup> for good conditions buildings. Private buildings are

<sup>27</sup> The CLOs/Social Safeguards Officers in MID and HCC will receive training and support from the safeguards specialists attached to MID's Project Management and Capacity Building Unit (PMCBU) and also from MID's Community Development Officer.

valued at replacement rate plus relocation expenses. However, it is highly unlikely that any permanent structures apart from minor fences and outbuildings will be affected.

The value of the lease, or part thereof, for the land to be resumed, is valued through Ministry of Lands, Housing and Survey (COL). Two valuation reports are prepared (one by the SIG valuer and one by the independent valuer) based on the size and condition of land, any improvements made to the land, and assessment in respect of the closest comparable values that are obtainable.

## **CONSULTATION AND INFORMATION DISCLOSURE**

The EAs, through their respective mechanisms (i.e. Community Liaison Officers and MID's Community Development Officer), will consult affected households, leaders, and representatives of community associations to ascertain their needs and concerns about land/asset acquisition.

The EAs will inform affected people of their entitlements through public consultations and the entitlement matrix will be translated into Pidgin and be made available in public places in the vicinity of the Project.

As noted in Section V, the EAs will ensure the participation of PAPs in planning and implementation of the process, and specific consultations in relation to land/asset acquisition. A Consultation Plan has been prepared for the project and this also requires consultations with communities (including focus group discussions with youth, women, formal and informal community leaders, church etc) as part of subproject preparation. Individual meetings with directly affected people/households (PAPs) will also be undertaken and recorded.

For subprojects, the EAs will carry out surveys (inventory of losses and census of those affected), based on preliminary technical designs. An inventory of losses will be completed for all PAPs losing use of land or assets to the Project. The screening and inventory will be conducted in a participatory manner with the head of the community/household working with the EAs/CLOs to estimate the losses and impacts.

To meet WB requirements on Public Consultation and Information Disclosure, this LAPF and any ESMPs prepared there-under will be disclosed to PAPs and beneficiary communities, following consultation.

## **GRIEVANCE REDRESS MECHANISM**

Complaints and grievance redress procedures will be outlined in the ESMPs to ensure stakeholder participation in the implementation process and to ensure there is a publicly acceptable forum with which to deal with any issues or complaints arising through land acquisition. Through public consultations, those affected will be informed that they have a right to grievance resolution.

It will be important that any grievance redress mechanism reflect the existing process for resolving disputes over compensation for resumed land. This includes filing a complaint with the local (Magistrates Court), and then pursuing in the High Court if the complainant is not satisfied with the decision of the local court.

The grievance resolution mechanism proposed for CAUSE is based on the above existing system for dispute resolution, and would require the complaint firstly being discussed by the complainant and the CLOs (as representatives of the EAs), Councillors/WAC Members and the COL. If a satisfactory conclusion cannot be obtained through this process, then the matter will be directed to the courts.

The CLOs will record all complaints (date, complainant, complaint/grievance, attempts to resolve the complaint, and outcomes). The record of the grievance redress mechanism will be the subject of monitoring.

## **MONITORING AND EVALUATION**

The ESMP will contain a monitoring framework consistent with the generic parameters/indicators set out in the ESMG. The EAs will monitor the progress of all aspects of land acquisition/AP implementation, if any. It will particularly monitor the delivery of entitlements to PAPs. The EAs will involve leaders and representatives of community associations to assist with the monitoring.

The monitoring will also cover the PAPs' satisfaction with consultation, timeliness of compensation payment, and restoration of livelihoods (ability of PAPs to restore livelihoods to at least pre-project levels).

The EAs will submit an annual review on APs to WB for review. WB review missions will specifically check the progress of land acquisition under the CAUSE.



## **Annexes to Appendix 3**

**Annex 1 – Land/asset Acquisition Screening Checklist**

**Annex 2 – List of Prohibited Sub-Projects**

**Annex 3 - Procedure for Acquisition of Registered Land**

**Annex 4 – Inventory of Losses Form**

**Annex 5 - Land Donation Form**

**Annex 6 – Declaration Of Consent Form**

## Annex 1 – Land/asset Acquisition Screening Checklist

LAND ACQUISITION AND RESETTLEMENT SCREENING CHECKLIST			
Ward			
Village/community:			
Brief Description of Site and Proposed Works:			
<b>1. Screening Questions for Land Acquisition &amp; Resettlement</b>			
Likely Effects	Yes	No	Description
Is land used by individuals or families (homestead, agriculture or garden land) likely to be affected?			
Is the ownership status and current usage of the land known?			
Will there be loss of housing?			
Will there be loss of agricultural plots?			
Will there be loss of crops and/or trees?			
Will there be loss of businesses or enterprise?			
Will there be loss of incomes and livelihoods?			
Are there non-titled people who live or earn their livelihood at the site or within the right-of-way?			
If "yes" to above, do they have structures in the ROW that will need to be removed?			
<b>2. Information on Affected Persons</b>			
What is the estimate of total number of households likely to be affected?			
What is the estimate of total number of people likely to be affected?			
What is the estimated number of households affected by loss of income and livelihoods?			
Briefly describe the types of income or livelihoods to be affected and nature of the impacts:			

<b>3. Document/Plan Requirements</b>			
Based on the forgoing identification of impacts and the Project's Resettlement Policy Framework. The subproject will:			
<input type="checkbox"/>	Create minor land acquisition/resettlement impacts (if YES ticked in answer to any question in Section 1), and a Resettlement Plan (completed as per the requirements of the RPF) is required		
<input type="checkbox"/>	Create no resettlement impact, no resettlement report is required, this screening checklist will be the documentation for the subproject		
<input type="checkbox"/>	Require the removal of illegal structures and is therefore not eligible for funding as a subproject under the REP.		
The foregoing has been reviewed and agreed with by:			
Name & Signature:		Date:	
Name & Signature (Community Liaison Officer):		Date:	
Name & Signature (Coordinator/ Senior Works Officer):		Date:	

Note: During use, the title of this form will need to be adjusted to cover land/asset acquisition only.

## **Annex 2: List of Prohibited Subproject Investments**

1. Purchase of Weapons
2. Purchase of Chainsaws and explosives;
3. Financing of sawmills
4. Purchase of pesticides, insecticides, herbicides, asbestos and other potentially and dangerous materials and equipment;
5. Purchase of equipment/materials related to dynamite fishing;
6. Road rehabilitation or construction into protected areas;
7. Use of funds to purchase or compensate for land; Use of mangrove or coral reefs as building materials;
8. Projects requiring resettlement or physical relocation of PAP;
9. Consumption items or events;
10. Financing of recurrent government expenditures (e.g. salaries for government and LGU staff)
11. Construction or repair and buying of equipment for government offices and places of worship;
12. Financing of political activities;
13. Salaried activities that employ children under 16 years;
14. Financing activities that unfairly exploit women or men at any age;
15. Financing international travel

## **Annex 3 – Procedure for Acquisition of Registered Land**

The following standards process for land acquisition involves the following steps. However, the project will work on the premise that no land acquisition negotiations will be entered into unless there is clear and uncontested ownership and that land ownership is clearly documents. Any land where there is any dispute over land ownership will not be a priority for CAUSE support. Proponents will be asked to address land issues using the national processes.

Land acquisition processes involve:

Commissioner of Lands or Provincial Secretary appointing an Acquisition Officer;

The Acquisition Officer, who has the power of a Magistrate, after a series of meetings and hearings, identifies a group of trustees (of between two and five people) who will represent the line in the acquisition process;

A notice is published specifying the date of the next hearing and listing the people initially identified as trustees; Following the hearing, a second notice is published and posted in public places nominating the trustees. The notification process is three months during which time appeals as to the nomination of trustees can be made; If there is an appeal, adjudication can be a made.

If there are no appeals as to the trustees, the area is surveyed and a Land Officer prepares a valuation report and certificate. Discussions are held with the trustees about whether the transaction will be through lease arrangements or complete acquisition, as well as initial discussions about the price;

Final negotiations are held with the trustees based on the valuation report and their own determination of the price for the land;

According to the Act, agreement to the compensation award must be obtained from the “majority” of persons with an interest in the land; and

Following agreement on the price the payment is made, a one-off payment (known as the premium) for acquired land or a premium plus rent for leased land. The Lands and Titles Act specified the term of a lease as 33 years unless an alternative agreement is reached.

## Annex 4 – Inventory of Losses Forms

### Form 1

Honiara City Council and Ministry of Infrastructure Development  
**Community Access and Urban Services Enhancement (CAUSE) Project**

#### ENTITLEMENT SURVEY OF AFFECTED PERSONS

Date of Survey: \_\_\_\_\_

Household Survey Number: \_\_\_\_\_

<b>Component:</b>			<b>Project No.</b>		<b>Community:</b>	
<b>Ward:</b>			<b>City / Town:</b>		<b>Province:</b>	
<b>Household Composition:</b>						
Name of Household Head and Members	Gender	Age	Ethnicity	Education	Occupation & Sources of Income	Estimated Total Income per Year
Head:						
Members:						
1.						
2.						
3.						
4.						
5.						
6.						
<b>Total Landholding</b>	<b>Sq. M.</b>		<b>Lot No.</b>			
<b>Properties to be affected by the Project</b>			<b>Quantity</b>	<b>Remarks</b>	<b>Entitlement</b>	
<b>A. Land</b>						
1. Residential			Sq. M.			
2. Commercial			Sq. M.			
3. Agricultural			Sq. M.			
<b>B. Crops (Specify)</b>						
1.			Sq. M.			
2.			Sq. M.			
3.			Sq. M.			
<b>C. Trees (Specify Age)</b>						
1.			Nos.			
2.			Nos.			
3.			Nos.			

<b>D. Structures (Specify)</b>			
1. Permanent	Sq. M.		
2. Temporary	Sq. M.		
3. Tombs	Nos.		
4. Wells	Nos.		
<b>E. Economic Losses (Explain Briefly)</b>			
1. Business Loss			
2. Income Loss			
3. Temporary Loss			
<b>F. Others (Explain Briefly)</b>			
1.			
2.			
<b>G. Sketch</b>			
Survey Conducted by:			
_____	_____	_____	
Community Representative	Local Government Representative	CAUSE Representative	
Conforme:			
_____			
Name and Signature of HH			

*Note: Attach donation paper or affidavit/statute of declaration of "quit claim" in case the affected person shall not claim for any entitlement.*

## Annex 4: Form 2

Honiara City Council and Ministry of Infrastructure Development  
Community Access and Urban Services Enhancement (CAUSE) Project  
INVENTORY & ENTITLEMENT OF PROJECT AFFECTED COMMUNITIES

<b>Component:</b>		<b>Project Number:</b>																		
<b>Community:</b>			<b>Ward:</b>			<b>City / Town:</b>			<b>Province:</b>											
HH Survey No.	Name of Community Leader	No. of Persons in community	<b>Land, Crop, and Trees Losses</b>			<b>Structures Losses</b>			<b>Economic Losses</b>											
			Total Landholding of HH in sq. m.	Land/asset to be Acquired in sq. m.	Land Type	Land Loss as % of Total	Crops lost type	Crops lost in Sq. Meters	Fruit trees Lost Type	Fruit trees Lost Number	No. & Type of lost structures	Structures Permanent in Sq. M.	Structures Temp.in Sq. M.	Tombs Number	Wells No.	Business lost	Income Lost	Temporary losses (Specify)	Other (Specify)	Total Entitlements n Solomon Dollars
<b>TOTAL</b>																				

\* Refer to Form No.1. (on file) as source of above data



## Annex 5 – Voluntary Land Commitment Form

If individual, the ESMG should provide some criteria for voluntary land donations, including minor impacts (usually no more than 10% loss of PAPs total land), donor should benefit from sub-project, siting should not be fixed to allow for real power of choice to donate or deny such donation, and verification process to ensure donation is not done under undue pressure to donate.

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

Village, Province: \_\_\_\_\_

I/We \_\_\_\_\_ [name(s)] acknowledge, I am/we are the rightful representative(s) of the land located at \_\_\_\_\_,

I/we confirm, I/we have the right under custom law, with agreement of community leaders, to *gift* this land for the purpose of \_\_\_\_\_ and sign this letter as a commitment of our voluntary donation that will benefit our whole community.

I/we declare that:

- (i) *I/We have the right to transfer rights to use or access this land;*
- (ii) *I/We understand that all residents will have access to this site and in order to maintain the asset/infrastructure;*
- (iii) *I/We commit ourselves in upholding the contents and spirit of this agreement for so long as it remains in force;*
- (iv) *I/We understand this donation is a gift that will benefit our whole community and understand no compensation payments will be made now or in the future;*
- (v) *I/We understand that dishonoring this agreement could result in project termination.*

Details of the land (size in m<sup>2</sup>, location in village, structures, Type – unused, bush, garden) \_

Size of Land:	
Location in the village:	
Structure:	
Type – unused, bush, garden	

For the purpose of: (specify activity)

\_\_\_\_\_

For the duration of: (specify commencement date and duration)

\_\_\_\_\_

I/We commit to donating \_\_\_\_\_ as a contribution for the project.

Signed:

**If the land is being donated by an individual:**

<b>Position</b>	<b>Signature</b>	<b>Name</b>
Male Household head		
Female Household head		
Landowner^		

**If the land is being donated by a collective:**

Clan or landowner representative (if applicable)		
Village Chief		
Subproject Committee Member		
Govt./Project Representative		
Witness		

**Annex 6 – Declaration of Consent for the (Name Of Works)**

\_\_\_\_\_  
 IN  
EXACT  
LOCATION) \_\_\_\_\_

**UNDER THE CAUSE PROJECT**

WHEREAS, the undersigned are the owners and/or occupiers of the properties where the proposed works or projects are to be done or constructed;

WHEREAS, for the good of the neighborhood and the general public, a request was made to seek the assistance of the CAUSE Project of the Solomon Islands Government to finance the works mentioned above;

WHEREAS, the CAUSE Project of the Solomon Islands Government agreed to finance the works mentioned above upon completion of required documents by the proponent;

WE HEREBY affix our signatures into this agreement as our consent to mutually allow the (state \_\_\_\_\_ works \_\_\_\_\_ and \_\_\_\_\_ location) \_\_\_\_\_ at no cost to the undersigned, for unrestricted access and use of the neighborhood and the general public.

THIS CONSENT shall not be construed as transfer of ownership. The undersigned shall continue to exercise all the rights over their respective properties and to bear all the responsibilities of such ownership including the paying of taxes or fees on the land.

SIGNED BY:

COMPLETE NAME	DESCRIPTION OF LAND/PROPERTY	SIGNATURE	DATE

WITNESSED BY:

\_\_\_\_\_, Date  
 Ward Councilor

\_\_\_\_\_, Date  
 CAUSE Representative/s

## Appendix 4 – Vulnerability Assessment Tool

Name of Community: \_\_\_\_\_ Ward: \_\_\_\_\_

Surveyed By: \_\_\_\_\_ Date : \_\_\_\_\_

### COMMUNITY PRIORITIZATION SCORING

Criterion No.	CRITERIA	Criterion Max Score	Sub-Criterion Max Score	Detailed Score (encircle one)
<b>I</b>	<b>BASIC SERVICES</b>	<b>40</b>		
<b>A</b>	<b>Access to Water Supply</b>		max 15	
1	Collect from rain water			15
2	Collect from spring			12
3	Collect from shallow well			9
4	Collect from communal faucets			6
5	Collect from SIWA water in-house connection			3
<b>B</b>	<b>Access to Education</b>			
1	No primary and secondary schools		max 15	15
2	With primary school; no secondary school			10
3	With primary and secondary schools			5
4	With primary, secondary and tertiary schools			3
<b>C.</b>	<b>Primary Source of Energy</b>		max 10	
1	Wood fire or no lighting regularly available			10
2	Kerosene, coconut or spirit lamp			5
3	SIEA electric supply or own generator			0
<b>II</b>	<b>LIVELIHOOD</b>	<b>20</b>		
<b>A</b>	<b>Opportunities for livelihood</b>		max 10	
1	No available land/space for backyard garden			10
2	Some available land/space for backyard garden			5
3	Ample space for backyard garden			0
<b>B</b>	<b>Marketing outlet</b>		max 10	
1	No market outlet in the area			10
2	Has existing market in the adjacent community (nearby)			5
3	Has existing market in the area			0
<b>III</b>	<b>POPULATION</b>	<b>20</b>		
<b>A</b>	<b>Total Population</b>		max 10	
1	300 population and above			10
2	100 to 299 population			5
3	less than 100			0
<b>B</b>	<b>House materials standard (majority)</b>		max 5	
1	Leaf house/non-permanent			5
2	Semi-permanent			3
3	Permanent			1
<b>C</b>	<b>Percentage of households without TOL</b>		max 5	
1	50% and above			5
2	30% to 49%			3
3	30% below			1
<b>IV</b>	<b>DISTANCE and Means of Accessibility</b>	<b>20</b>		

<b>A</b>	<b>Distance from CBD</b>		max 5	
1	5 kilometers and above			5
2	Less than 5 kilometers			1
<b>B</b>	<b>Means of Accessibility</b>		max 10	
1	Foot path			10
2	Rough road			5
3	All weather road			0
<b>C</b>	<b>Public Transportation</b>		max 5	
1	No public transport plying in the area			5
2	Has public transport plying in the area			0
	<b>TOTAL SCORE</b>			
	<b>Safety supplementary Score</b>			
1	Severe Safety concern (danger to life or serious injury)			20
2	Major safety concern (incidence of injury documented; possible evacuation route/facility)			15
3	Safety concerns raised as priority in community consultation			10
4	Addresses potential safety hazard			5
	<b>TOTAL SCORE WITH SAFETY WEIGHTING</b>			

Key Informants:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_

**PROPOSED PRIORITY SCORE:**

- High (80 or more)
- Medium (60-79)
- Low (59 or less)

## Appendix 5 – List of People Consulted during ESGM Preparation

Description	Name/Group
<b>Honiara</b>	
HCC City Clerk	Charles Kelly
Ministry of Finance & Treasury	Matthew Pitavato
Ministry of Finance (Statistics Office)	Anterlyn Tuzakana
Ministry of Lands, Housing & Survey - CTA	Alan Mc Neil
Ministry of Peace and Reconciliation	Reuben Lilo
World Bank Country Representative	Guido Rurangwa
Ecological Solutions	Dr David Boseto
World Vision Gender Programme Manager	Maria Adelaida Alberto
GHUDSAP Consultant	Steve Likaveke
REP/CAUSE HCC Project Manager	Salvador Jiao
REP MID Project Manager	Arnulfo Garcia
REP Community Liaison Officers	Naelene John Justin Lima Tina Maena'a
REP Works Coordinator	Joe Ruriti
REP Pre-employment Training Manager	Judith Fangalasu
REP Counsellor	Alison Pitu
<b>Auki</b>	
Provincial Secretary	Jackson Gege
MPA Ward 1	Malcolm Moli
Minister for Dev Planning	Glen Waneta
Minister for Works	Martin Fini
Ministry of Peace and Reconciliation	Thomas Puahanikeni Augustine Meti Walter Mabo Ben Ofofa Francis Kasiano
Ministry of Fisheries	Matthew Isihanua
Environmental Health Officer	Gloria Sivainao
Youth Coordinator	Frank Samo
Oxfam Family Violence Program (Safe Families) Coordinator	Nelson Sobo
Auki Women's Association	Office bearers and members Martha Ruras Diana Ngele Anna Saeni Gladys Aefu Cathy Mahlon Kathy Pearson
(Kwaibala) Ambu Native Land Trust Board	Chairman and member Marlon Toito'ona Alvin Sibisoa
Isushi tribal Committee	Administrator, Jonathon Malai
Fulikaomae community group	Pastor + 24 community members 21 male and 3 female (note: female members were already at market and participated in market meeting)
Auki Women's Market Association	Chair, office bearers and 59 women members
SSF Church	Pastor, Police Senior Officer 27 male, 31 female members
<b>Gizo</b>	
Deputy Premier	Hon Malon Lopoto
MPA	Hon Chris Siale
Town Clerk	Derald Michael

Description	Name/Group
Ministry of Peace and Reconciliation	Wilson Liligeto Bruno Manele
Youth at Work	Gerry Douglas
	Rajii Willie Mona
Red Cross Gizo	Ogier Kiko
Catholic Church TVET Program	Mrs Rayne
Jah Mountain Community group	15 members 8 male, 7 female
Malakerava 3	3 member, female
Methodist Church Women's Savings and Credit Group	15 members, female
Adhoc focus groups at market	5 young female (Gizo, Munda) 3 female (Gizo) 5 young male (Gizo)
Guadalcanal Pilot area	
Provincial Secretary	Timothy Ngele
Titinge2 (water pump)	Community Leader Mike, Group of 39, 17 men, 22 women

## Appendix 6 – Consultation Plan

As part of best practice for project consultation and in specific response to OP4.11, the following Consultation Plan provides an outline for communication with stakeholders, community leaders, community members and individual stakeholders, as well as the general public. It is important to note that as the majority of population in the Solomon Islands are indigenous, no separate processes are required for Free and Prior Informed Consent of Indigenous Peoples. The approach prepared is in line with the Draft Environmental and Social Safeguards Instruments in Pacific Island countries, March 2015. Therefore, the process is embedded within the broad community consultation processes. The SA determined that the most critical aspect for effective communication across communities and stakeholder is to have prior discussions with key stakeholder to ensure that as many communication avenues as possible are used where release of information is required.

Acronyms: CDO – Community Development Officer (MID); CLO – Community Liaison Officer (established for Project in both MID and HCC); COL – Commissioner of Lands; EAs – Executing Agencies (for CAUSE = MID and HCC); ESMG – Environmental and Social Management Guidelines; ESMP – Environmental Management Plan; FGDS – focus group discussions; GP – Guadalcanal Province; HCC – Honiara City Council; LTA – Lands and Titles Act; MECDM – Ministry of Environment, Climate Change and Disaster Management; MFT – Ministry of Finance and Treasury; MID – Ministry of Infrastructure Development; MLHS – Ministry of Lands, Housing and Survey; MP – Malaita Province; MPGIS – Ministry of Provincial Govt. and Institutional Strengthening; MWYC – Ministry of Women, Youth and Children; NYC – National Youth Congress; PAs – Project Affected Persons; PET – Pre-Employment Training; PIU – Project Implementation Unit (for CAUSE within MID); PMU – Project Management Unit (within MID); ROW – Right-of-Way; RP – Land/asset Acquisition Plan; SIG – Solomon Islands Government; SWO – Senior Works Officers (MID/HCC)WC – Ward Committee; WB – World Bank; WBRM – World Bank Resident Mission; WP – Western Province.

Item	Activities	Estimated Timing (Date or Period)	Responsibility	Feedback/Issues or Concerns Raised	Remarks/Actions to be Taken
<b>PROJECT APPRAISAL PHASE</b>					
Stakeholder meetings	Consultations and meetings with line agency stakeholders, other development partners and NGOs; Initial meetings with Councilors/Ward Committee (as representatives of communities).	Aug/Sep 2017	WB ESMG Consultant; WB Appraisal Team; MID/HCC	Introduction to the Project; potential beneficiaries; types and location of subprojects; key stakeholders and agencies involved in implementation; advice as to assistance required from communities, (labor, materials, clearance of illegal structures etc)	Minutes written up and made available for monitoring; Concerns and issues to be incorporated into ESMP and SA where appropriate; Establish community contact points
Preparation of draft ESMG Report (incl. ESMGs, and Consultation Plan)	Initial consultation with MID/HCC and stakeholders	Aug/Sep 2017	WB ESMG Consultant	Summarized in Social Assessment (SA) and ESMG Report	Issues identified to be further taken up during more detailed consultations in subproject identification and implementation.



Item	Activities	Estimated Timing (Date or Period)	Responsibility	Feedback/Issues or Concerns Raised	Remarks/Actions to be Taken
Review of draft ESMG and SA	Review of ESMG Report and appendices; Comments to be addressed	Aug/Sep 2017	MID/HCC/WB	As identified by WB and EAs	Finalization of ESMG Report (based on comments); ESMGs and SA to be disclosed
WB Board Approval of Project	Presentation to Board; Approval of Project; Grant agreements put in place;	Dec 2017	WB; MFT		Official commencement of CAUSE notified in newspapers and on radio (start-up of mobilization)
MoU's signed with participating provincial governments	Preparation and review of MoUs for signing	Jan 2018	MID/HCC/WB/PG	Prior review of MOU draft required	Sufficient time given for Provincial Governments to review MoU instrument
Broad dissemination of project info	General information about project provided in sufficient time and in appropriate language, as determined by consultation with key stakeholders and community leaders.	End Sep 2017	MID/HCC/WBRM	Provide info to be included in an Information Pack	MID/HCC and WBRM to contact MWY/C – Research, Planning & Policy Division to arrange
General project information dissemination	Initial distribution of general information about project provided	Dec 2017	MID/HCC	Agreement on information to be provided and what stages of Project	Reflected in Finalized Consultation Plan
Condition survey and initial identification of obstructions/illegal structures etc on roads	Obstructions and/or constraints in ROW (Initial identification of OP 4.12 triggers) i.e. fences, culverts, bridges, roadside stalls and other structures within approximately 15 m of the road centerline located and identified as part of survey	Jan 2018	PMU MID-CDO/WB	Obstructions/issues recorded as part of inventory database	Issues identified to be discussed with WB/MID/HCC and communities
<b>PROJECT PREPARATION AND IDENTIFICATION OF SUBPROJECTS PHASE</b>					
Project management structures established	MPMU & PIU established; Additional staff/TA recruited; HCC Project Manager engaged; CLOs (MID/HCC) identified/recruited	Jan 2018	MID/HCC	MID/HCC might need to identify potential KEY staff/recruits earlier on in order that start of project is not delayed	Monitoring systems to be put in place; CLO/Social Safeguards to discuss any training/capacity building needs
Stakeholder and community group identification/registration; Short-listing of Contractors (MID)	Initial community meetings, stakeholder agency meetings	Feb 2018	MID/HCC-CLOs, Councilors/WC	Incorporated into Consultation Plan as required	Meeting minutes to be documented and available for monitoring
Community consultations and subproject ESI screening (checklist) completed (based on preliminary identification of	Identification of subproject impact areas, field visits; Community meetings and FGDS with women's church, and youth groups	Feb 2018 – ongoing (as required by sub-project)	MID/HCC-CLOs, Councilors/WC	ESI checklists completed by CLOs and SWO (MID)/ Coordinators (HCC)/PGDO	Identification and scoping of issues (land/asset acquisition, social and environmental); Formulate available information as

Item	Activities	Estimated Timing (Date or Period)	Responsibility	Feedback/Issues or Concerns Raised	Remarks/Actions to be Taken
works/activities)		sequencing)			baseline for project monitoring and evaluation; Checklists reviewed by Project Managers
MOUs or community agreements signed with participating communities	Agreement by community to (i) participate in PET and provide labor as required; and (ii) ensure that road segment is free of illegal/encroaching structures or gardens etc; signaling acceptance of the sub-project. Documented as "pre-conditions" of subproject implementation	-Feb 2018 ongoing (as required by subproject sequencing)	Community representatives (Councilors/WAC members) MID-CDO/CLO; HCC-CLO/PGDO	"Non-subprojects" (i.e. community does not agree to removal of illegal structures) to be recorded as such	Subproject/community MOUs/community agreements available for monitoring
<b>IMPLEMENTATION/WORKS PHASE</b>					
Detailed scope of works produced for subprojects	Identification of lease arrangements; Coordinate with COL, other relevant Lands divisions (Planning and Survey) and HCC (request info from Register of Title);	Mar 2018 - ongoing (as required by subproject sequencing)	MID/HCC-CLOs; COL (and other)/PGDO		Detailed works to be identified by HCC-Works Director, MID-TPPD Director, Project Managers
Subproject ESMGs collated	As per ESMG Report (incl. ESMGs for subproject activities)	Mar 2018 - ongoing (as required by subproject sequencing)	MID/HCC-CLOs SWOs	Each ESMG reviewed by Project Managers, sample of ESMGs reviewed by HCC-Works Director, MID-TPPD Director	Leading Hands/Contractors to be advised of agreed ESMG requirements
Inventory of losses and other relevant documentation included in ESMG	Participatory inventory of losses undertaken by EAs/CLOs and PAPs; Community consultations incl. focus group discussions with youth, women, community leaders and directly affected parties (PAPs); Preparation, approval/endorsement of proposed mitigating activities; Summary/ESMP distributed to affected villages and made available for PAPs to review	As required	MID/HCC-CLOs WB		ESMP or summary to be disclosed as per LAPF; Approved ESMG uploaded to WB's website
Notification of any land "acquisition" (resumption) required and any assets to be removed/relocated	As per LAPF, ESMF and SIG regulations	ASAP prior to works (as required by subproject sequencing)	MID/HCC-CLOs;/PGDO COL	Publish list of affected lands/sites in local newspapers	PMU to organize public notices

Item	Activities	Estimated Timing (Date or Period)	Responsibility	Feedback/Issues or Concerns Raised	Remarks/Actions to be Taken
AP implementation (including public notices as required under LTA)	Following procedure set out in LAPF, land acquisition implemented and compensation awarded; notice of clearance of ROW issued; construction zone cleared of encumbrances	ASAP prior to construction (as required by subproject sequencing)	MID/HCC; Villages and PAPS	Timing of implementation of ESMF will be critical to start of subproject works – compensation MUST be awarded prior to works commencing	AP to be fully implemented (i.e. all compensation awarded <u>prior</u> to works); AP monitoring commences
Meetings as required to resolve grievances and complaints	As per LAPF and ESMF and outline procedure in ESMG Report	ASAP prior to works (as required by subproject sequencing)	MID/HCC-CLOs/PGDO As required, Councilors/WC	Address issues as required; recorded for monitoring purposes	All complaints and grievances to be recorded (case no., date, location, complaint, action required, resolution date) to allow monitoring
Temporary land uses (for works) identified	Confirmation of ROW and adjacent land use arrangements etc	ASAP prior to works (as required by subproject sequencing)	MID/HCC-CLOs; Contractor	Any temporary use of land beyond ROW to be negotiated between MID/Contractor and land-user (if not HCC land)	Subject to negotiations between Contractor and land-user
Identification of quarries and potential material sources	MID, HCC (and Contractor ??) responsible for identifying any material sources/new quarries required	As required	MID/HCC/PGDO Outside HCC - village chiefs and landowners	To follow measures and requirements outlined in LAPF and ESMF	Extraction of materials to follow MID's Aggregate Extraction Guidelines
Obtain all necessary environmental (and any other) permits required	As per process set out in ESMG Report (development consent applications)	ASAP prior to works (as required by subproject sequencing)	MID/HCC/PGDO MECDM	All activities to be monitored	Monitoring of compliance with permit conditions and approved ESMF provisions
Advance notice to village of removal of any material not already cleared from ROW works/activities zone	Clearing and grubbing (incl. removal of all stumps, roots and other organic material below ground level) limited to NOTIFIED area required for works.; Any additional area to be used temporarily as negotiated between Contractor and land-user)	One month before commencement of works/activities	MID/HCC/PGDO	Clearing shall not extend outside the limit of the NOTIFIED area unless otherwise agreed with land-user and community	Subject to monitoring and evaluation
Involvement of local community/labor in works/activities	Engagement of local youth and women as laborers following completion of PET	During activities and works	MID/HCC/PGDO Contractor; community groups/labourers	In compliance with local labor laws	Internal and external monitoring to ensure hiring targets met and compliance issues
Consultation and disclosure arrangements during (i) implementation, (ii) monitoring and evaluation	As per ESMG Report and any relevant SIG laws and requirements for notification	As required	MID/HCC/PGDO/ PMU/PIU	None	All consultation and disclosure activities to be monitored

Item	Activities	Estimated Timing (Date or Period)	Responsibility	Feedback/Issues or Concerns Raised	Remarks/Actions to be Taken
Compliance monitoring and evaluation	As per project performance monitoring system and monitoring plan	As identified in monitoring plan	MID/HCC MECDM	Corrective actions identified with timeframe for resolution	Where possible community to participate in monitoring process
Post-activity/works updates to communities and stakeholders	Keep communities informed and highlight operational issues	Immediately prior to completion	MID/HCC-CLOs/PGDO/PMU/PIU	Address issues as required; recorded for monitoring purposes	Update as required
Benefit monitoring and post-evaluation	As per project performance monitoring system, environmental/social impact monitoring plan and post-land acquisition monitoring requirements	As identified in LAPF and ESMG Report	MID/HCC/PGDO community; WB	As identified during monitoring; WB mid-term review and post-evaluation	Community to participate in monitoring process

## Appendix 7. Grievance Redress System

### FEEDBACK AND GRIEVANCE REDRESS SYSTEM

The Feedback and Grievance Redress System (GRS) for the Solomon Islands and World Bank CAUSE Project is designed to allow an avenue for project participants, general community members, other interested parties and citizens of the project areas, and other stakeholders (NGOs, development partners, parliamentarians, etc.) to comment on or express concern on matters relating to project implementation. It is intended to allow these various stakeholders to pass on important information to higher levels of project oversight and management in a neutral and, if necessary, anonymous fashion.

#### The GRS comprises:

1. Feedback Mechanism and Feedback Form
2. Grievance Redress Mechanism outlining the process for receiving and managing complaints and Complaints form
3. Critical Incident
4. Feedback, Complaints and Incidents Register and Reporting Procedures

**Definition of Feedback** Comments or suggestions received from stakeholders that relate to the project, but are not raised as a complaint that requires specific action for that individual stakeholder, are classified as feedback. These comments or suggestions can be either positive or negative.

**Definition and Types of Grievances** A grievance arises from a complaint made which is usually negative towards the project and requires a specific response to the person or group who has made the complaint. Project staff workers are expected to handle three types of grievances. These include (i) grievances from community workers relating to project processes that might be resolved at the rudimentary level by providing accurate information that complainants are looking for and through clarification on project policies/rules; (ii) grievances brought by community workers who feel they cannot discuss with group leaders (GLs) or Contractors (e.g. payment issues) and (iii) complaints and issues regarding CAUSE works and workers, which may be made by Councilors and the general public.

#### Feedback Mechanism

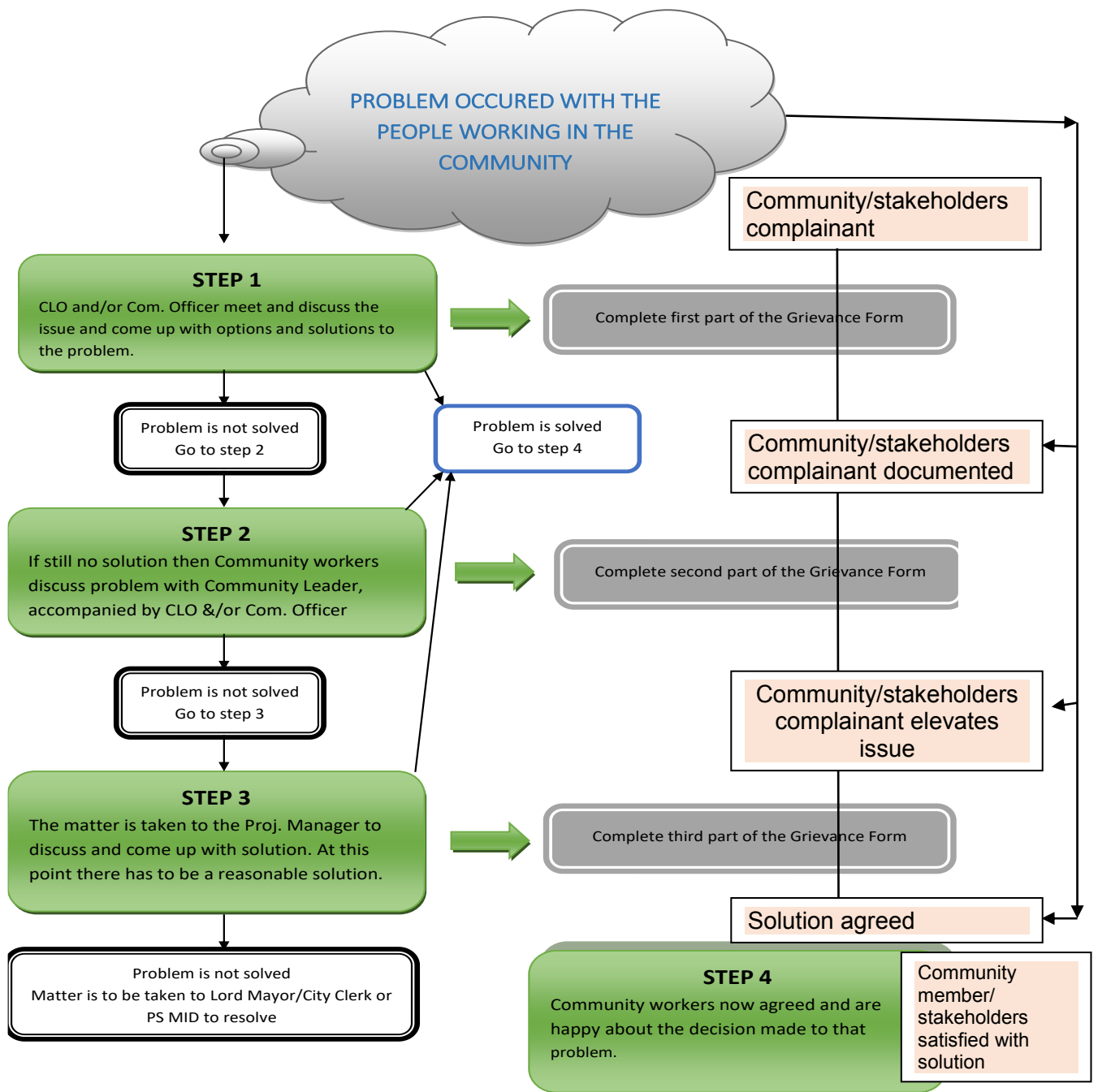
Feedback from project participants, general community and other stakeholders should be encouraged as a way to ensure that the project is appropriate and can continuously improve throughout implementation. A variety of ways to provide feedback should be made available. These include availability of a specific feedback form included on the following page, which individuals can complete (or request to be completed on their behalf by project staff) and submitted to any staff member of the project. A feedback hotline mobile number should be maintained within the Honiara Office to receive anonymous feedback or complaints by phone call or text. This phone should remain locked in the office outside of work hours and is assigned to staff members to receive and document feedback received each day. A suggestion box at reception could also be a way for participants to make anonymous comments without making a formal complaint. These various feedback mechanisms should be made known to communities participating (e.g. at any community meetings, information available as a flyer on how to give feedback or make complaints). It is particularly important to provide IEC materials on the GRS at the onset of project implementation, especially in subproject sites.

**CAUSE Project Feedback Form**

Name of person giving feedback	
Gender and age of person giving feedback	
Location/s that feedback relates to (Province and local area)	
Name of person documenting feedback	
Date of receiving feedback	
Details of feedback	
Action Taken (if necessary)	

**Grievance Redress Mechanism**

This section presents the step-wise process that makes up the grievance redress mechanism (GRM). Building from the GRM developed in REP, this process strives for a culture of openness to feedback and grievances, and for resolution of the majority of grievances at the initial engagement level with field staff and as necessary with the local and community level. Where this is not possible, it outlines the process for involving HCC and MID, Provincial Government Authorities and even the Bank’s Honiara office as required. This process is summarized in the figure below and each step is then outlined in the following paragraphs. All grievances must be recorded using the Form at the end of this section that outlines the nature of the grievance, actions taken and eventual resolution. Key information from these (date, location, what grievance related to, who was involved in resolution, time taken to resolve) must be recorded in a central database to allow monitoring and evaluation of the GRS.



**Step 1 of the Process – Resolution by Field Staff**

Field staff personnel, particularly Community Liaison Officers (CLOs) and the Communications Officer (or equivalent), are normally the first layer of engagement between the project and project participants (community workers). Issues raised at this level may include queries and complaints by groups who have applied for work and have not as yet been selected, complaints relating to pay or to working conditions. All grievances entering the process at this level will be recorded and tracked with project grievance forms. Specific FAQs, brochures and posters should be developed and distributed for CAUSE to reduce the time taken to address grievances relating to selection, equity and applications.. As most contracts for community works are short it is necessary that grievances related to community workers should be immediately addressed with a view to reaching resolution within one working week. All other grievances including those raised by Councilors and the general public should be addressed within two working weeks and should include advice of what further steps can be taken in cases where the complainant is not satisfied with the response. It is expected that most complaints should be addressed at this first step, however if a resolution satisfactory to the complainant/s is not at this step, the complaint should progress to Step 2.

**Step 2 of the Process – Resolution by Local Leaders**

This stage of the GRM is to acknowledge the important role that community leaders in Solomon Islands play in resolving local problems. It recognizes the respect that community members bestow upon their local leaders (chiefs, pastors, ward councilors), and their effectiveness in mediation, conflict resolution and providing practical, culturally-sensitive counsel. The experience from REP was that disputes between community workers and their group leaders at times are better resolved in the presence of more senior or respected local leaders. Contractors, Group Leaders and community workers should be made aware either through contractual requirements or through PET courses and pre-mobilization briefings that the expected standard of service for resolution of local level complaints is a maximum of two working weeks. Any unresolved issues at the end of this time should be referred to the project managers.

#### *Step 3 of the Process – Involvement of Project Managers*

CAUSE Project Managers (PMs) will deal with: grievances not resolved by field staff in the required time; with grievances with which the complainants are not satisfied with the actions taken by the CLOs or Communication Officer; grievances and complaints directly against CLOs and other field staff; complaints and grievances brought by contractors of MID sub-projects and any and all allegations of corruption. For serious cases involving allegation on corruption, the PM shall constitute a panel of investigators which shall conduct fact-finding and recommend sanctions or any further action as needed. PMs should have taken action on grievances brought to them in at least two working weeks having investigated the matter and contacted the complainants as to their recommendations and actions. All complainants of grievances that cannot be resolved within two working weeks should be promptly advised that their complaint has been forwarded to either the office of the Lord Mayor and/or City Clerk and/or equivalent Provincial Government representative or that of the Permanent Secretary for MID. When referring issues to these representatives, the PMs must include a written brief accompanied by all documentation including the updated project grievance forms.

#### *Step 4 of the Process – Referral to Implementing Agencies*

Serious issues that cannot be resolved by the PMs should be promptly referred to either the office of the Lord Mayor and/or City Clerk or that of the Permanent Secretary for MID. The general public should be aware that they have the right to bring serious allegations and issues relating to project design directly to either of these offices. Unless otherwise advised PMs will continue to provide executive services relating to the resolution of grievances referred to the offices of the Lord Mayor and/or City Clerk or that of the Permanent Secretary for MID. These services will include communications with the complainants and updating of project grievance forms. It is realistic to assume that with the provision by the PMs of the required executive services, responses to most grievances referred to the office of the Lord Mayor and/or City Clerk or that of the Permanent Secretary for MID should be completed in a maximum of two weeks.

#### *Step 5 of the Process – Involvement of Bank Staff – A Last Resort*

The World Bank office/staff in Honiara should be, as a last resort, available to become involved in attempts to address grievances not resolved at the level of the implementing agencies.

### **Complaints Handling and Grievance Redress Process – Communication and Reporting Summary**

1. All community workers, communities and stakeholders should be provided with the following information at the pre mobilisation consultation:
  - The Grievance Redress Process and the steps (including a timeline).
  - Methods of possible contact for complaint and contact information; and
  - Assurances that complaints/grievances can be kept confidential if requested; and if so their complaints will be identified by a case number
2. Complainants should bring grievances directly to the CLO's and/or field staff initially since they are their first point of engagement with the project.
3. Grievances such as those against CLOs and Field staff and those dealing matters of alleged graft and corruption can be brought directly to the PMs.
4. It may be possible to involve community leadership in the resolution of complaints. The worker may prefer to deal with the Group Leader or Contractor in the presence of a third party. Thus, the second level of any complaint should be between the worker and the Group Leader (HCC sub-projects) or the Contractor or his/her representative (MID sub-projects) accompanied by the CLOs and/or Communications Officer, and the local community leader.
5. The Group Leaders and the Contractors will maintain a Register of Complaints, which includes:
  - Date of complaint
  - A specific identification number for the complaint
  - Name of complainant
  - Details of complaint
  - Other persons (if any) involved in addressing problem (community leader etc)
  - Action planned and taken to settle the matter
  - Was problem solved?



6. The Register of Complaints should be available at all times for inspection by the CLOs and other field staff during the sub-contract and will be submitted to the Project Manager periodically on a monthly basis.
7. Information from the Group Leader's or Contractor's Register of Complaints should be entered into the MIS system on a regular basis.
8. All grievances and complaints should be documented at the uptake point on a form or register that contains:
  - Date of complaint;
  - A specific identification number for the complaint (especially if confidentiality is required);
  - Type of communication (face to face, telephone, written, etc);
  - Classification of the type of complaint – for entry into the MIS.
  - Person(s) to whom the complaint is directed;
  - Name, address and contact details of complainant (unless confidentiality is essential)
  - Details of complaint;
  - Action planned and taken to settle the matter with details through each step of the Grievance Redress Process – as per chart below.
  - Confirmation that resolution has been reached to the satisfaction of all Parties.
9. Data from Registers of Complaint will be codified and encoded by the administrative assistant responsible for entering the data into the MIS in the MIS database. Allow for tracking and inform trends and management mitigation strategies.
10. It is expected that community members and beneficiaries will also channel comments on the Project through this process.
11. The CLOs will inspect all Complaints Registers on a weekly basis transferring data to the project MIS and commencing action on unresolved complaints. The Project Manager will review and discuss the incoming complaints with the CLOs on a weekly basis to ensure that all received complaints have been responded to and are being/have been acted upon.
12. The Complainant can expect response to complaints reaching the Project Office within 2 weeks of registering the complaint.
13. The Project Manager will conduct a quarterly review of received and resolved/closed complaints to identify trends. Where trends are identified, the Project Manager will develop an Action Plan to address those trends. The information from this analysis will be used to inform the Project's quarterly reports.

#### **Staff Sanctions or Actions**

Sanctions shall be imposed through a resolution of an Investigation Panel formed by the Project Manager (for cases involving community workers and/or project staff) or a Memorandum Order issued by the City Clerk (in HCC cases) or Permanent Secretary of MID (in MID cases) upon conclusion of the veracity of the said complaints. Below are list of suggested possible sanctions or actions depending on the gravity of the act.

#### For community workers

1. Warning (coupled with reorientation)
2. Reprimand
3. Suspension of Project activities
4. Blacklisting

#### For CAUSE Staff

1. Warning (coupled with reorientation)
2. Reprimand
3. Suspension from work
4. Termination of employment
5. Blacklisting

Sanctions may be imposed upon any individuals or bodies (community worker, community groups, project staff, PM, etc.). Any action by the project management shall be without prejudice to the penal, civil or administrative sanctions imposed by any government laws or guidelines. In cases of complaints related to poor performance of duties, misconduct by community worker, misconduct by project staff, and violation of law, the Project Manager shall conduct a thorough study of the GRS findings and recommendations. They shall observe absolute impartiality in their decision vis-à-vis complaints lodged before them. They may seek the assistance of the Project Steering Committee (PSC) especially in sensitive cases that involve other implementing partners such as government officials and personnel. Cases of alleged misuse of funds should be reported to the relevant authorities for further action.

## CAUSE Project Grievance Redress Form

### BASIC INFORMATION

<p>Name of Complainant: .....</p> <p>Date of Complaint: .....</p> <p>Contact Phone: .....</p> <p>Location of Ward: .....</p> <p>Contact Address: ..... ..... .....</p> <p>Ethnic Background: .....</p> <p>Gender: .....</p>	<p>Complainant – category</p> <p><input type="checkbox"/> Community worker</p> <p><input type="checkbox"/> Group leader</p> <p><input type="checkbox"/> Contractor</p> <p><input type="checkbox"/> General public</p> <p><input type="checkbox"/> NGO</p> <p><input type="checkbox"/> Councilor</p> <p><input type="checkbox"/> Parliamentarian</p> <p><input type="checkbox"/> Other (please specify)</p>
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Where/How was the complaint received:

In person     Project Help Desk    Referral from Community/ISDT Consultant

Community Leader     Project Event     Written     Telephone

On-site: \_\_\_\_\_ (write location)

### DETAILS OF COMPLAINT/GRIEVANCE:

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### COMPLAINTS AGAINST

<input type="checkbox"/> Group leader <input type="checkbox"/> Contractor <input type="checkbox"/> Fellow worker	<input type="checkbox"/> Works Coordinator <input type="checkbox"/> Supervisors <input type="checkbox"/> CLO	<input type="checkbox"/> Project Manager <input type="checkbox"/> Councilor <input type="checkbox"/> MID	<input type="checkbox"/> Project processes <input type="checkbox"/> Project design <input type="checkbox"/>
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### TYPE of COMPLAINT

<p><b>A. Work Related</b></p> <input type="checkbox"/> Payment <input type="checkbox"/> Type of work <input type="checkbox"/> Problem with leader <input type="checkbox"/> Conflict with co-worker <input type="checkbox"/> Other	<p><b>B. Project Processes</b></p> <input type="checkbox"/> Registration <input type="checkbox"/> Screening & endorsement by HCC <input type="checkbox"/> Targeting & selection	<p><b>C. Project Design</b></p> <input type="checkbox"/> Project goals <input type="checkbox"/> Community needs <input type="checkbox"/>	<p><b>D. Corruption related</b></p> <input type="checkbox"/>
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	<input type="checkbox"/> Training		
<b>Signed by Complainant:</b> .....			

LEVEL 1 (Community Liaison Officer)	
Name of Project Staff:	Date of Action:
Details of Level 1 response/resolution (including persons involved)	
Result: Resolved <input type="checkbox"/> Unresolved <input type="checkbox"/> and Referred to Level 2 <input type="checkbox"/>	
Comments/reaction from complainant: Date: .....	

LEVEL 2 (Ward Councilor, Community/Church/Tribal Leader)	
Name of Project Staff:	Date of Action:
Details of Level 2 response/resolution (including persons involved)	
Result: Resolved <input type="checkbox"/> Unresolved <input type="checkbox"/> and Referred to Level 3 <input type="checkbox"/>	
Comments/reaction from complainant: Date: .....	

LEVEL 3 (Project Mgr.)	
Name of Project Staff:	Date of Action:
Result: Resolved <input type="checkbox"/> Unresolved <input type="checkbox"/> and Referred to a Higher Authority? <input type="checkbox"/>	
Details of Level 3 response/resolution (including persons involved)	
Referred to: (City Clerk; MID PS; PSC; WB)	Date feedback was provided to complainant: .....
Comments/reaction from complainant:	
Final Status: ..... Signed: .....	



**Classification of Feedback/Complaints for MIS System**

<p><b>Type</b>                  A. Feedback                  B. Grievance/Complaint</p> <p><b>Method of Making Complaint</b>                  1.1 Via Group/Contractor                      Complaints Register                  1.2 In person to Project Staff                  1.3 Telephone                  1.4 Written</p> <p><b>Person Making Complaint</b>                  2.1 Community worker,                  2.2. Group leader or contractor,                  2.3. Community member,                  2.4. General public,                  2.5. NGO,                  2.6. Councillor,                  2.7 Parliamentarian                  2.8. Other (please specify)</p> <p><b>Complaints Against:</b>                  3.1 Group leader / contractor                  3.2 Fellow workers                  3.3 Works supervisors                  3.4 CLOs                  3.5 Project Managers                  3.6 Councillors                  3.7 MID                  3.8 Project Processes                  3.9 Project Design</p>	<p><b>Type of Complaint</b>  <b>4. About work:</b>                  4.1 Payment,                  4.2 Type of work                  4.3 other problem with group leader/contractor,                  4.4 conflict with fellow workers                  4.5 Other</p> <p><b>5. Project Processes:</b>                  5.1 Registration,                  5.2 screening and endorsement by HCC                  5.3 Targeting and Selection                  5.4 Training                  5.5 other</p> <p><b>6. Project Design</b>                  6.1 project goals                  6.2 community needs</p> <p><b>7. Corruption Related</b></p>
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**Complaint Summary Form**

*For direct entry into project MIS*

1. Complaint Number: .....
  2. Date of complaint :.....
  3. Method of Making Complaint:.....
  4. Stakeholder Making Complaint:.....
  5. Complaint Made Against:.....
  6. Type of Complaint:.....
  7. Was Problem Solved? Yes / No
  8. At What Step was Problem Solved? 1 2 3 4 5
- Number of Working Days to Solve Problem:.....