REPUBLIC OF THE MARSHALL ISLANDS

Pacific Islands Regional Oceanscape Program for Economic Recovery and Resilience (PROPER) Project

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

Marshall Islands Marine Resources Authority
as Implementing Agency

Prepared for the Government of the Republic of Marshall Islands by the Centralized Implementation Unit of the RMI Division of Development Assistance (DIDA)

October 2022

Acronyms and Abbreviations

CESMP	Contractor Environmental and Social Management Plan
CIU	Centralized Implementation Unit
DIDA	Division of International Development Assistance
E&S	Environmental and Social
EEZ	Exclusive Economic Zone
EHS	Environmental, Health, and Safety
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESIA	Environmental and Social Impact Assessment
ESCoP	Environmental and Social Code of Practice
ESF	Environment and Social Framework (World Bank)
ESMP	Environment and Social Management Plan
ESRS	Environmental and Social Review Summary
EMP	Environmental Management Plan
ESS	Environment and Social Standard
FAD	Fish Attraction Device
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GoRMI	Government of the Republic of the Marshall Islands
GM	Grievance Mechanism
HPO	Historic Preservation Office
HT	Human Trafficking
IDA	International Development Association
JHA	Job Hazard Analysis
LMP	Labor Management Procedure
MIMRA	Marshall Islands Marine Resources Authority
MOF	Ministry of Finance
OHS	Occupational Health and Safety
NEPA	National Environmental Protection Act 1984
PDO	Project Development Objective
PEA	Preliminary Environmental Assessment
PICs	Pacific Island Countries
PIFS	Pacific Islands Forum Secretariat
PMU	Project Management Unit
PNA	Parties to the Nauru Agreement
PROP	Pacific Regional Oceanscape Program
PROPER	Pacific Regional Oceanscape Program for Economic Recovery and Resilience
RMI	Republic of the Marshall Islands
RMI PROPER	RMI Pacific Regional Oceanscape Program for Economic Recovery and Resilience (“the Project”)
RMIEPA	RMI Environmental Protection Authority
SEAP	Stakeholder Engagement Action Plan
SEP	Stakeholder Engagement Plan
SOP	Standard Operating Procedures
TORs	Terms of Reference
VAC	Violence Against Children
VDS	Vessel Day System
WB	World Bank
WCPO	Western and Central Pacific Ocean
WUTMI	Women United Together Marshall Islands

Executive Summary

The Government of the Republic of the Marshall Islands (GoRMI) has requested support from the World Bank (WB) for the Republic of the Marshall Islands Pacific Regional Oceanscape Program for Economic Recovery and Resilience (RMI PROPER) Project ('the Project') following successful completion of the WB-funded Republic of the Marshall Islands Pacific Regional Oceanscape Program (RMI PROP) Project.

As part of project financing, the Project is required to comply with the requirements outlined in WB's Environmental and Social (E&S) Framework and ten Environmental and Social Standards. The purpose of this Environmental and Social Management Plan (ESMP) is to provide a system for managing the E&S risks and impacts associated with the Project in alignment with the World Bank requirements and relevant RMI national regulations. The ESMP provides information and guidance on the following:

- Project activities
- Applicable RMI regulations and World Bank standards/guidelines
- Environmental and social context
- Environment and social risks, potential impacts and mitigation
- Risk management processes
- Incident management
- Implementation responsibilities, resources and capacity building
- Detailed protocols, procedures and templates to support the implementation of the ESMP (provided as appendices).

The ESMP is one of several instruments developed to manage the E&S aspects of the Project and is supported by a Stakeholder Engagement Plan, Labor Management Procedures and an Environmental and Social Commitment Plan.

The Project is part of a multi-phased approach to regional programs across the Pacific designed to strengthen the shared management of selected Pacific Island oceanic and coastal fisheries, and the critical habitats upon which they depend. The Project Development Objective is to strengthen regional collaboration and national capacity for sustained socio-economic contributions of the oceanic and coastal fisheries sector in the Marshall Islands.

The Ministry of Finance (MOF) will serve as the Executing Agency and the Project will be implemented by the Marshall Islands Marine Resources Authority (MIMRA). The Project is expected to commence in mid-2023, and to run for a period of 6 years.

The RMI PROPER Project is designed to assist in achieving the Strategic Goals outlined in MIMRA's Strategic Plan (2019-2023). The WB funding will support a set of sub actions linked to the strategic goals, including optimization of revenues; strengthened management of fisheries and the coastal environment; promotion of sustainable coastal fisheries and value-chain enhancements; and maximize income and livelihood opportunities.

Project activities will include civil works, construction and renovations (e.g., renovating existing buildings); procurement of equipment and technology (e.g., upgrading communications infrastructure, procuring equipment); undertaking of feasibility and other studies (e.g., feasibility studies for use of by-catch, costing study for a research station, various technology feasibility studies); and technical advisory, training and capacity development activities (e.g., recruitment of various roles, training, development of various procedures, financing Reimaanlok activities).

The Project is being implemented to strengthen regional collaboration and national capacity for sustained socio-economic contributions of the oceanic and coastal fisheries sector in the Marshall Islands, which is thus

expected to result in long-term positive environment and social impacts. Despite this, there are potential environmental and social risks associated with the project. The key risks, potential impacts and mitigations identified are:

- typical construction-related impacts/risks (e.g., noise, dust, waste management) to be managed through implementation of Contractor Environmental and Social Management Plans
- generation of electronic/solid waste to be managed by sending all solid waste to Majuro that cannot be reused, refurbished, or recycled, will be sent to an authorized overseas facility due to limitations with landfills in RMI
- occupational health and safety (OHS) risks to be managed through the preparation and implementation of contractor OHS procedures, and implementation of existing MIMRA procedures
- potential for Gender Based Violence, Sexual Exploitation, Abuse, Harassment and Violence against Children to be mitigated and managed through mandatory Code of Conduct for workers, awareness training and the Grievance Redress Mechanism.
- feasibility and other studies not including appropriate consultation leading to study findings missing key information which is to be mitigated through requiring the terms of reference for each scope of work to include consultation component and requirement to prepare activity-specific Stakeholder Engagement Action Plans.

The implementation of the ESMP will primarily be the responsibility of the Project Coordinator from the Project Management Unit (PMU) that has been established within MIMRA specifically for the Project. The PMU will be supported for E&S matters by the RMI Ministry of Finance's Centralized Implementation Unit (CIU) team, which comprises an International Environmental Specialist, an International Social Specialist, and a locally based E&S Officer. The WB E&S team will provide regular E&S risk management compliance monitoring and support for the project. Construction contractor(s) will be required to comply with the Project's E&S risk management plans and procedures, including this ESMP and the LMP, as well as local legislation, and this will be specified in the contractor's agreements.

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1. Introduction

The Government of the Republic of the Marshall Islands (GoRMI) has requested support from the World Bank (WB) for the Republic of the Marshall Islands Pacific Regional Oceanscape Program for Economic Recovery and Resilience (RMI PROPER) Project ('the Project') following successful completion of the WB-funded Republic of the Marshall Islands Pacific Regional Oceanscape Program (RMI PROP) Project. Both projects are part of multi-phased approach regional programs across the Pacific designed to strengthen the shared management of selected Pacific Island oceanic and coastal fisheries, and the critical habitats upon which they depend. The specific objective of the RMI PROPER Project is to strengthen regional collaboration and national capacity for sustained socio-economic contributions of the oceanic and coastal fisheries sector in the Marshall Islands.

The Ministry of Finance (MOF) will serve as the Executing Agency and the Project will be implemented by the Marshall Islands Marine Resources Authority (MIMRA). The Project is expected to commence in mid-2023, and to run for a period of 6 years.

As part of project financing, the Project is required to comply with the requirements outlined in WB's Environmental and Social Framework (ESF) and, as such, this Environmental and Social Management Plan (ESMP) has been prepared to satisfy a project financing requirement. The purpose of this ESMP is to provide a system for managing the environment and social (E&S) risks and impacts associated with the Project in alignment with:

- The WB ESF, including the ten Environmental and Social Standards (ESSs).
- Relevant RMI national regulations.

The ESMP is one of several instruments developed to manage the E&S aspects of the Project and is supported by:

- Stakeholder Engagement Plan (SEP)
- Labour Management Procedures (LMP), including annexed Code of Conduct
- Environmental and Social Commitment Plan (ESCP).

All E&S instruments have been disclosed on the MIMRA Website[1] and the Centralized Implementation Unit (CIU), Division of International Development Assistance (DIDA) website[2].

2. Project Description

2.1. Context

The Western and Central Pacific Ocean (WCPO) region covers 11 percent of the world's ocean area and is home to 22 small island countries and territories. Pacific Island Countries (PICs) are small in size with limited natural resources, narrowly based economies, large distances from major markets, and vulnerable to external economic and environmental shocks. Tuna fisheries in the WCPO are a major source of revenue and foreign exchange, while coastal fisheries are essential for population wellbeing (e.g., food and nutrition, households' incomes and livelihood, and culture).

[1] http://www.rmimimra.com/
[2] https://www.ciudidasafeguards.com/

The WCPO marine fisheries forms part of a bigger marine ecosystem that cuts across the PICs and the harvesting of migratory species, such as tuna requires coordination. The fisheries sector in the WCPO is already largely regional, with each country's decision impacting on the other countries. Regional coordination is needed to foster synergy for effective management, equitable distribution of wealth and optimal sectoral investments. Countries face common constraints regarding their fisheries sector: governance challenges, insufficient human and institutional capacities, and a fragile business environment.

In response to increasing demand for assistance from PICs, the World Bank completed a Fisheries Engagement Strategy for the region at the end of 2011. On this basis, in early 2012 a number of PICs, as well as the Pacific Islands Forum Secretariat (PIFS), began discussions with the World Bank about the possibility of a coordinated regional project to provide International Development Association (IDA) financing as well as technical assistance to support continued sustainable development of the marine fisheries. After the extensive consultations between the World Bank and the PICs, common elements emerged for a coordinated package of IDA financing and technical assistance to the PICs for the fisheries and oceans sectors, known as the Pacific Islands Regional Oceanscape Program (PROP). The RMI PROP Project (2015 to 2021) was funded under the PROP. The Pacific Islands Regional Oceanscape Program: Second Phase for Economic Recovery and Resilience (PROPER) is a continuation of the PROP and the program under which the RMI PROPER Project is being funded.

The support under the RMI PROP Project enabled MIMRA to better engage with and support RMI outer islands and atolls through is oceanic and coastal divisions. The project support was through delivery of technical assistance, capacity building, training and community engagement, provision of goods and services etc. Some of the results achieved under the RMI PROP Project are:

- Achievement of regional conservation goals under the Micronesia Challenge.
- Establishment of the Protected Areas Network Office.
- Accelerating implementation of the Reimaanlok[3] Framework.
- Enhancing MIMRA's State-of-the-Art Fisheries Information and Communications Technology.
- Strengthening RMI's leadership role in the Parties to the Nauru Agreement (PNA) Vessel Day System (VDS).
- Establishment of the national Competent Authority.

The impact of COVID-19 in RMI on maritime transport connectivity, and RMI closing its borders had a significant impact on completing critical project output for PROP, such as: the international recognition of the competent authority; completion of the Reimaanlok process i.e., moving to finance and implement the plans to demonstrate the value addition (i.e., results) of such a participatory management tool for conservation and livelihood improvement.

Key recommendations for RMI PROPER Project design ensuing from the RMI PROP Project are to: i) Ensure implementation readiness bearing in mind potential impact of COVID-19 and other external factors; ii) Structure investment priorities and programs using a sound results-oriented strategic plan; and iii) Align project design with realism. For example, any investment in coastal fisheries management requires consensus building, which involves time, including long term support.

[3] community-based conservation management

2.2. Project Overview

The RMI PROPER Project follows on from the RMI PROP Project and is designed to assist in achieving the Strategic Goals outlined in MIMRA's Strategic Plan (2019-2023)[4] which are:

- MIMRA will maximize the long-term value from its fisheries for the benefit of the people of the RMI.
- MIMRA will conserve and manage the aquatic resources for current and future generations in the RMI.
- MIMRA will be professional, transparent, and accountable in the way it manages fisheries resources in the RMI.

The WB funding will support a set of sub actions linked to the strategic goals, including optimization of revenues; strengthened management of fisheries and the coastal environment; promotion of sustainable coastal fisheries and value-chain enhancements; and maximize income and livelihood opportunities.

The proposed RMI PROPER Project has four components:

- Component 1. Strengthening Policy and Institutions, comprising three subcomponents:
    - 1.1: Improving capacity for policy design, implementation, and evaluation
    - 1.2: Strengthening seafood health monitoring
    - 1.3: Improving infrastructure and their operation
- Component 2. Strengthening Regional Collaboration and National Capacity for Oceanic Fisheries, comprising two subcomponents:
    - 2.1: Consolidating oceanic fisheries management
    - 2.2: Harnessing of oceanic fisheries to regional economy
- Component 3. Strengthening Regional Collaboration and National Capacity for Coastal Fisheries and Conservation of Critical Coastal Habitats, comprising two subcomponents:
    - 3.1: Strengthening coastal fisheries and habitat management
    - 3.2: Developing and diversifying livelihoods in support of fisheries management.
- Component 4. Project management

The Project Development Objective (PDO) for the Project is to strengthen regional collaboration and national capacity for the management and the sustainable development of the oceanic and coastal fisheries sector in the Marshall Islands. Achievement of the PDO will be monitored through the tracking of the following indicators:

1. Fisheries management is informed by timely access to data by national and regional stakeholders, as: (a) data collection, integration, and processing systems automated; (b) number of fish base and aquaculture sites with organized data collection systems and information retrieval; (c) percentage of Observers and Port Monitors' data transmitted in real-time into MIMRA's fisheries information management system.

[4] http://www.rmimimra.com/media/attachments/2021/02/08/mimra-strategic-plan-2019-2023.pdf

2. Minimum number of species on which MIMRA conducts regular, standardized toxicology monitoring.
3. Minimum percentage of the RMI licensed longliners under electronic monitoring in RMI waters.
4. Minimum number of new communities adopting a resource management plan with marine element through the Reimaanlok process.
5. Minimum number of communities earning positive net income from piloted alternative livelihood initiatives under PROPER.
6. Minimum number of companies accredited in national industry standards for fish handling.

2.3. Project Components

The Project's four components are described in the following sections.

2.3.1. Component 1: Strengthening Policy and Institutions

Component 1 (Strengthening Policy and Institutions) will provide institutional support to the national fisheries program in RMI for better regional, national, sub-national, including cross sectoral, coordination and management and development of fisheries. It will also strengthen the capacity of the departments under MIMRA for research, data and information mining, analysis, storage and use for strategic decision making to inform economic growth. The major activities involved consist in (a) improving capacity for policy design, implementation, and evaluation; (b) strengthening seafood and environmental health monitoring; (c) improving infrastructure and their operation. This will be achieved through:

- **Subcomponent 1.1 Improving capacity for policy design, implementation and evaluation: This subcomponent responds to increasing MIMRA's institutional capacity to fulfil its mandate**. Activities supported under this subcomponent include:
    i. capacity development for MIMRA staff to meet current and future regional and national obligations;
    ii. consultancies to inform fishing access negotiations, market access, domestic development and building legal capacity for coastal fisheries;
    iii. assessment and development of integrated data collection and processing systems for their automation and enhanced information;
    iv. annual assessments of fish marketing flows from all sources, and regular collection and analysis of fish consumption data for the development of human health guidelines; and
    v. determination of secure and optimized data collection systems and information retrieval, and related equipment, for remote sites, including Reimaanlok sites.
- **Subcomponent 1.2 Strengthening seafood health monitoring:** The subcomponent will contribute to achieving MIMRA's objective to access European Union market by establishing the SPS protocol and system for monitoring seafood and fisheries products. Activities supported under this subcomponent include:
    i. providing equipment, software, training, engagement and capacity development to complete the establishment and implementation of the CA and the new seafood toxicology laboratory at MIMRA;
    ii. monitoring ciguatera, particularly in reef fishes in remote locations, through trialing protocols and establishing more comprehensive testing capacity at the main MIMRA laboratory; and
    iii. assessing and developing a management regime for pollution sources within Majuro Lagoon.

- **Subcomponent 1.3 Improving infrastructure and their operation.** The subcomponent will contribute to strengthening and improving the capacity, including climate resilience of MIMRA assets. Activities supported under this subcomponent include:
  i. renewing and enhancing information and communications technology (ICT) infrastructure for MIMRA headquarters' (including videoconference system, network and backup systems, hardware, security and monitoring systems) and the Fish Base and Aquaculture sites; and
  ii. audit all MIMRA infrastructure and operations for energy efficiency, decarbonization and climate-proofing, and implement recommendations at MIRMA headquarters.

2.3.2. Component 2: Strengthening Regional Collaboration and National Capacity for Oceanic Fisheries

Component 2 (Strengthening Regional Collaboration and National Capacity for Oceanic Fisheries) would specifically address a selected set of Strategic Actions that aim to strengthen regional and national capacity for the management and sustainable development of oceanic fisheries and their value chains with two subcomponents focusing on:

- **Sub-component 2.1 Consolidating oceanic fisheries management**: The sub-component will contribute to addressing increasing monitoring, control and surveillance obligations. It will consist of:
  i. recruiting Fisheries Inspectors to support the operations of the Competent Authority, including equipping them with communication equipment;
  ii. testing commercially available technologies for monitoring vessels for compliance in collaboration with regional organizations to improve data provision and monitoring at regional and national level;
  iii. expanding electronic monitoring to meet current and future regional standards and obligations;
  iv. improving connectivity for real-time transmission of Observers and Port Monitors' data into MIMRA's information management system;
  v. conducting consultancies and a study tour for the establishment of an ePort system for Port State Monitoring obligations.
- **Sub-Component 2.2 Harnessing of oceanic fisheries to regional economy:** The subcomponent will contribute to increasing domestic value-added, economic diversification, and employment through conducting;
  i. a gap analysis on the domestic industry to improve infrastructure and systems for compliance with new Fish Processing and Export Regulations to enhance access to premium markets;
  ii. potential studies on by-catch and production of locally based fish meal; and
  iii. acquisition of feed analysis equipment to support nutrient analysis for local aquaculture activities.

2.3.3. Component 3: Strengthening Regional Collaboration and National Capacity for Coastal Fisheries and Conservation of Critical Coastal Habitats

Component 3 (Strengthening Regional Collaboration and National Capacity for Coastal Fisheries and Conservation of Critical Coastal Habitats) would specifically address a selected set of Strategic Actions that aim to strengthen regional collaboration and national capacity for the management and sustainable development of coastal fisheries and their value chains with two subcomponents focusing on:

- **Sub-component 3.1. Strengthening coastal fisheries and habitat management:** The sub-component will contribute to:
    i. developing research capacity to inform management including the establishment of an outer island research station on Arno;
    ii. strengthening and expanding the Reimaanlok network[5]; and
    iii. strengthening compliance in coastal areas.

  This sub-component will support RMI to reach the Micronesia 2030 targets to conserve at least 30 percent of the nearshore marine resources and 20 percent of the terrestrial resources across Micronesia by 2020.

- **Sub-Component 3.2 Developing and diversifying livelihoods in support of fisheries management:** The sub-component will contribute to support fish products' preservation, valorization and marketing and to help alleviate pressure on reef species for sustainable long-term socio-economic benefits through (a) sustaining outer island infrastructure; and (b) accelerating the uptake of income generating opportunities. Activities include:
    i. rehabilitating, repairing and upgrading of existing MIMRA's outer island assets that support value addition;
    ii. developing and implementing aquaculture development strategy/recommendations to strengthen MIMRA's engagement with local government and communities on aquaculture potential;
    iii. conducting a production and market feasibility study for key coastal fisheries and aquaculture species to inform communities of value, opportunities and investment needs related to these species;
    iv. carrying out studies to identify income generation opportunities in coastal fisheries value chains to support livelihood diversification; and
    v. carrying out study on promoting the utilization of local anchored FADs.

[5] The Reimaanlok network is a network of atoll communities that have put in place community-lead resource management plans. This is set up using the 8-step Reimaanlok Conservation Area Management Planning Framework that involves (1) initiating the process; (2) project scoping and set-up; (3) building commitment; (4) collecting and managing information (social; ecological and physical); (5) developing the management plan; (6) committing to the plan by sign-off on the plan; (7) monitoring the biological and social objectives and adapting the management plan accordingly; (8) maintaining commitment and ensuring the community has support for ongoing management. Further information about the Reimaanlok can be found at:
https://www.atollconservation.org/reimaanlok
http://www.rmimimra.com/index.php/about-us/rmipan

2.3.4. Component 4: Project management

Component 4 (Project Management) will include technical and operational assistance works, goods, services, workshops, and operational costs to support day-to-day management and implementation of the project, and reimbursing project preparation. This will include procurement, financial management, environmental and social instruments, and preparation of annual work plans and organization of audit reports; coordination between regional and national activities as well as local governments in the outer islands of RMI. It will provide institutional support and capacity development for project management, coordination, implementation, and monitoring and evaluation system to report on the project's expected results (disaggregating by gender, where appropriate) and systematize the project's lessons learned. As required, it will also cover the costs of ICT and finance activities for citizen engagement.

3. Legislative and Regulatory Framework

3.1. Republic of Marshall Islands

This section provides an overview of sections of the RMI legislative and regulatory framework that is relevant to the Project.

3.1.1. Constitution

The Constitution of RMI, which came into effect in 1979 with amendments in 1995, sets forth the legal framework for the governance of the Republic. The Preamble to the RMI Constitution states:

"All we have and are today as a people, we have received as a sacred heritage which we pledge ourselves to safeguard and maintain, valuing nothing more dearly than our rightful home on the islands within the traditional boundaries of this archipelago."

From an E&S perspective, the Constitution confirms that the GoRMI has a responsibility to protect and maintain heritage and ensure that the islands continue to provide a sustainable home to the people of the Marshall Islands for generations to come.

3.1.2. National Environmental Protection Act 1984

The National Environmental Protection Act 1984 (NEPA) provides for the establishment of a National Environmental Protection Authority (RMIEPA) for the protection and management of the environment.

The RMI Environmental Protection Authority (RMIEPA), established under the NEPA, is the governing body for environmental protection in the RMI. The primary purpose of the RMIEPA is to preserve and improve the quality of the environment of the RMI, and to that end, the Act specifies the following objectives for the RMIEPA:

- to study the impact of human activity including redistribution, cultural change, exploitation of resources and technological advances on the environment
- to restore and maintain the quality of the environment
- to use all practicable means including financial and technical assistance to foster and promote the general welfare of the people by creating conditions under which mankind and nature can co-exist in productive harmony
- to improve and coordinate consistently with other essential considerations of National policy, governmental plans, functions, and programs and resources to as to prevent, as far as practicable, any degradation or impairment of the environment

- to regulate individual and collective human activity in such manner as will ensure to the people safe, healthful, productive, and aesthetically and culturally pleasing surroundings
- to attain the widest possible range of beneficial uses of the environment without degradation or impairment thereof and other undesirable consequences to the health and safety of the people
- to preserve important historical, cultural, and natural aspects of the nation's culture and heritage, maintaining at the same time an environment which supports the multiplicity and variety of individual choice.

The NEPA is supported and further elaborated in a set of regulations for protection of surface and marine waters, and air quality, and managing of potential impacts from earth works, sanitation systems, waste, and new infrastructure development. The Act, and these regulations along with the Coast Conservation Act 2008, provides the framework for the protection of resources and environmentally sustainable development in RMI. The regulations are:

- Earthmoving Regulation 1988 (with amendments in 1994 and 1998)
- Solid Waste Regulations 1989
- Toilet Facilities and Sewage Disposal Regulation 1990
- Marine Water Quality Regulation 1992
- Public Water Supply Regulation 1994
- Environmental Impact Assessment (EIA) Regulation 1994
- Ozone Layer Protection Regulation 2004
- Pesticides and Persistent Organic Pollutants Regulation 2004

Only three of these (EIA Regulation 1994, the Earthmoving Regulation 1984, and the Marine Water Quality Regulation 1992) may be applicable to the Project as part of the renovations work and, as such, the process for approval to undertake development works is provided.

The *Solid Waste Regulations 1989* establish minimum standards governing the design, construction, operation and maintenance of solid waste storage, collection, and disposal facilities such as landfills. The Regulations also govern the handling of hazardous waste within RMI. The project is not anticipated to generate hazardous wastes.

The *Toilet Facilities and Sewage Disposal Regulations 1990* provide for regulated toilet and sewage facility systems in RMI. Under the Regulations the owner of a property is responsible for the structural completeness, good repair, and maintenance of toilet and sewerage facilities, and must obtain a permit from the Health Authority for each toilet disposal facility to be included in a new building. This is a standard part of building construction works in RMI.

Applications for approval to undertake development works are to be made to the RMIEPA, and are reviewed through a Preliminary Environmental Assessment (PEA) process. Step 1 of the process is an initial evaluation of the PEA to determine if the activity has the potential for significant effect on the environment. This PEA can take the form of a letter in the event of very minor works such as geotechnical sampling. Step 2 is either the issuance of an Earthmoving Permit with, or without, conditions (e.g. Minor and some Major applications), or a requirement for an EIA in the case of proposals (e.g. Major applications) assessed to have potential significant impact which will be reviewed

and form the basis of an approved decision with conditions, or a not-approved decision. The proposed upgrades to the outer-island assets may require an Earthmoving Permit. The proposed Project works are unlikely to trigger an EIA. Conditions pre-or post- EIA may include a requirement for an Environmental Management Plan (EMP). In cases where a proponent EMP has been drafted prior to the submission of an Earthmoving Permit Application, it may require modification to meet the conditions of approval.

The EIA Regulation sets out the content of the Environmental Impact Assessment which is to address the following matters (Regulation 23):

- Direct environmental effects and their significance
- Indirect environmental effects and their significance
- A description of the relationship between short-term uses of the environment and the maintenance an enhancement of long-term productivity
- Consideration of cumulative environmental impacts
- Natural or depletable resources requirements and the potential for their conservation
- Urban quality, scenic quality, historic and cultural resources, and the design of the built environment
- Impact on population and human uses of the land
- Alterations to ecological systems
- Projected pollution of the environment
- Means to mitigate adverse environmental impacts
- Description of any unavoidable adverse environmental impacts
- An analysis of the costs and benefits that may result from the proposed development activity and
- Identification of any irreversible or irretrievable commitments of resources required for the proposed development activity.

The Earthmoving Regulations require developers to:

- Set out the erosion and sediment control measures in a plan (Erosion and Sediment Control Plan) and make it available at all times at the site of the activity and file the plan with the RMIEPA.
- Attend any meetings as requested by the RMIEPA together with other interested parties to determine the scope of the plan.
- Obtain the services of a person trained, experienced and certified, if applicable, in erosion and sedimentation control methods and techniques to prepare the erosion and sediment control plan.
- Consider in the erosion and sedimentation control plan all factors that contribute to erosion and acceleration.
- On completion, stabilize the areas disturbed to prevent accelerated erosion and sedimentation upon completion of the project.
- On completion, remove all unnecessary or unusable control facilities, grade the area and stabilize the soil upon completion of stabilization.

3.1.3. RMI Building Code

The National Building Code of the Republic of the Marshall Islands 2021 Edition is presently in a draft form and is being formatted to suit RMI's needs and international requirements. Once finalized the Code will be rolled out by the Ministry of Works, Infrastructure, and Utilities.

The Code update incorporates requirements for RMI in terms of standards for resilience and flood protection relating to climate change.

This code may be relevant to the Project as part of the renovation works.

3.1.4. Historic Preservation Act 1991

The purpose of this Act is to promote the preservation of the historic and cultural heritage of the RMI.

The Act provides for the Historic Preservation Office (HPO) to be responsible for issuing or denying permits, for use, access, and development of land containing cultural and historic properties, and for the taking of any artifact of cultural or historical significance from the RMI for cultural exchange, scientific identification, or donation to a bona-fide non- profit organization recognized on the basis of its cultural significance.

The Regulations Governing Land Modification Activities 1992 that sit under this Act require every developer, private or corporate, to announce to the HPO any construction affecting the soil at least 30 days in advance of construction. Notifiable activities include any kind of earthmoving and land fill as well as land and vegetation clearing using machinery.

HPO staff, or qualified personnel employed to do so by the developer, will then conduct a survey to determine whether archaeological, historical or traditional sites are present or not. If such sites are found, and if the HPO deems the sites significant for preserving the heritage of the RMI, the HPO may recommend that the development be relocated. If this is not feasible, an excavation must be undertaken in order to recover most of the data contained in the site. Thereafter the development can begin.

The Regulations Governing the Disposition of Archaeologically Recovered Human Remains that sit under this Act stipulate that burials shall not be disturbed wilfully unless permission has been given according to the Historic Preservation Act (1991) and other executing regulations. If human remains are found, then these shall be examined and described, and thereafter be reburied at the earliest possible moment. The intent of the regulations is to ensure that human remains are treated with the dignity and respect they deserve, and that it shall be avoided that human remains are permanently stored on the shelves of museums or other institutions.

3.1.5. Coast Conservation Act 1988

This Act makes provision for a survey of the coastal zone and the preparation of a coastal zone management plan; to regulate and control development activities within the coastal zone; to make provisions for the formulation and execution of schemes for coast conservation.

‘Coastal Zone’ means ‘the area laying within a limit of twenty five (25) feet landwards of the mean high water line and a limit of two hundred feet seawards of the mean low water line’.

Part IV sets out a Permit procedure for obtaining permission to engage in any development activity within the coastal zone. It requires the proposed activity to:

(a) Be consistent with the Coastal Zone Management Plan and any regulations made to give effect to such Plan
(b) not otherwise have any adverse effect on the stability, productivity, and environmental quality of the Coastal Zone.
(c) Furnish an environmental impact assessment report.

Part V 319 empowers the Director, or any officer authorized by him in writing, to issue permits subject to such conditions as he may impose having regard to the Plan, for the occupation, for any period not exceeding three years of any part of the foreshore or bed of the sea lying within the Coastal Zone.

A National Coastal Management Framework under the Coastal Conservation Act was developed by the RMIEPA in 2008. The Coastal Management Plan makes recommendations for various topics (e.g., coastal development, resource utilization, data collection, legal management, and local coastal management programs to deal with both urban and outer islands), which relate to the implementation of climate change adaptation options. This plan sets out the permitting process and requirements that are prerequisites for the implementation of activities in the Coastal Zone.

This code may be relevant to the Project as part of the renovation works.

3.1.6. Marshall Islands Marine Resources Act 1997

This Act makes provision for the management, conservation and development of fisheries resources of the Marshall Islands and the development of the fisheries industry, and in relation with this the establishment of the MIMRA. Three regulations sit under this Act:

- **Marshall Islands Fisheries Regulations 1998** – this regulation sets out licensing procedures and requirements; transhipment; fish export certification; vessel reporting requirements; and exportation of fish.
- **Aquaculture Regulations 2019** - this regulation sets out procedures and principles of and requirements for aquaculture establishment licence; the obligations of licence holders; the procedures and principles of and requirements for obtaining an annual permit for the import and export of live fish and live feed; approval for the introduction of exotic species of live fish or live feed for aquaculture purposes in accordance with biosecurity guidelines; safety requirements for aquaculture products; management strategies for aquaculture farms; and offences and penalties.
- **Fish Harvest Regulations 2020** – this regulation set out rules for banning certain harvesting methods, particularly spearfishing with scuba diving gear and the use of chemicals and/or explosives, to protect fish stocks. It outlines the MIMRA appointment of fish inspectors to regulate minimum fish size standards for commercial fishing operations and the commercial export of such fish and fish products. The regulation sets out the prohibited harvesting methods and minimum size limits for certain species.

3.1.7. Marshall Islands Maritime Zones Declaration Act 2016

This Act provides for the declaration of maritime zones of the Marshall Islands and defines the boundaries of those zones and the jurisdiction of the Marshall Islands in those zones. Maritime zones set out in the Act are the:

- Territorial Sea
- Archipelagic Waters
- Contiguous Zone
- Exclusive Economic Zone
- Continental Shelf.

3.1.8. Tuna and Game-Fish Conservation Zone Act 1996

This Act establishes a Tuna and Game Fish Conservation Zone with a 50-mile limit from the base line of each atoll and island in the RMI. The Act prohibits fishing within the Conservation Zone by foreign and local fishing vessels without a valid license issued by the MIMRA. The prohibition does not apply to sport fishing and subsistence fishing activities.

3.1.9. International Environmental Agreements

RMI is a signatory to the following regional and international agreements that may be relevant to the Project:

- Nauru Agreement Concerning Cooperation on the Management of Fisheries of Common Interest
- South Pacific Regional Trade & Economic Cooperation
- South Pacific Forum Fisheries Agency Convention
- Treaty on Fisheries between the Government of Certain Pacific Island States and the Government of the United States of America
- Convention for the protection of natural resources & environment in the South Pacific
- Protocol for the prevention of pollution in the South Pacific Region by dumping
- Protocol on Hazardous and Noxious Substances Pollution, Preparedness, Response and Cooperation in the Pacific Region
- Convention on long drift nets in the South Pacific
- Niue Treaty on Cooperation in Fisheries Surveillance & Law Enforcement in the South Pacific Regio
- Palau Agreement for Management of the Western Pacific Purse Seine Fishery
- Convention on the Conservation & Management of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean
- South Pacific Forum
- United Nations Framework Convention on Climate Change
- 1995 Convention to Ban the Importation into Forum Island Countries of Hazardous and Radioactive Wastes and to Control the Transboundary Movement and Management of Hazardous Wastes within the South Pacific Region, Waigani, Papua New Guinea.

3.2. World Bank Group

3.2.1. Environmental and Social Framework

The World Bank Environmental and Social Framework sets out the 'World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards (ESS) that are designed to support Borrowers' projects, with the aim of ending extreme poverty and promoting shared prosperity'. The framework become effective on 1 October, 2018 and applies to all Investment Project Financing (IPF) initiated after this date. The framework consists of three parts:

1) A Vision for Sustainable Development - the Bank's aspirations regarding environmental and social sustainability.
2) The World Bank Environmental and Social Policy for Investment Project Financing - requirements that apply to the Bank.

3) The ESS requirements that apply to the Borrower and projects. The ESS are comprised of ten standards covering various topics:

- ESS1 Assessment and Management of Environmental and Social Risks and Impacts
- ESS2 Labor and Working Conditions
- ESS3 Resource Efficiency and Pollution Prevention and Management
- ESS4 Community Health and Safety
- ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
- ESS8 Cultural Heritage
- ESS9 Financial Intermediaries
- ESS10 Stakeholder Engagement and Information Disclosure

3.2.2. Environment and Social Risk Classification

As part of the Bank's requirements for project financing (as per the Environmental and Social Policy for Investment Project Financing) projects must be assessed and classified according to their level of environment and social risk. The classifications are: High Risk, Substantial Risk, Moderate Risk and Low Risk. This classification considers:

- Type, location, sensitivity, and scale of the project
- The nature and magnitude of the potential environmental and social risks and impacts
- The capacity and commitment of the Borrower to manage the environmental and social risks and impacts.

The risk ratings for PROPER are assessed as Moderate for both environmental and social risks.

3.2.3. Applicable Environmental and Social Standards

Screening of the ESS that apply to the Project was undertaken as part of the ESRS Concept Stage. Six of the ten ESS are relevant, namely:

- ESS1 Assessment and Management of Environmental and Social Risks and Impacts: This standard sets out the Borrower's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing, in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs).

- ESS2 Labor and Working Conditions: This standard recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.
- ESS3 Resource Efficiency and Pollution Prevention and Management: This standard recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels.
- ESS4 Community Health and Safety: This standard recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts.
- ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources: This standard recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development. Biodiversity is defined as the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species, and of ecosystems.
- ESS10 Stakeholder Engagement and Information Disclosure: This standard recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

Although ESS8 (Cultural Heritage) was not deemed relevant to the Project due to Project activities being unlikely to affect cultural heritage, Chance Find Procedures have been included in the ESMP to address unknown archeological or historical remains and objects, including graveyards and/or individual graves.

3.2.4. Environmental, Health and Safety Guidelines

The Project will utilise the WB Group's Environmental, Health, and Safety (EHS) Guidelines[6]. The EHS Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). It contains the performance levels and measures that are normally acceptable to the WB Group and are generally considered to be achievable in new facilities at reasonable costs by existing technology. The EHS Guidelines are comprised of General Guidelines which are organised by themes (environmental; occupational health and safety; community health and safety; construction and decommissioning) and industry-specific guidelines that cover over 60 specific industries relating to agribusiness and food production; chemicals; forestry; general manufacturing; infrastructure; mining; oil and gas; and power.

The following EHS guidelines are relevant to the project:

- General EHS Guidelines: Environmental (including management air quality, water quality, noise, waste and hazardous materials)

[6] https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

- General EHS Guidelines: Occupational Health and Safety
- General EHS Guidelines: Community Health and Safety
- General EHS Guidelines: Construction and Decommissioning
- EHS Guidelines for Aquaculture.

3.3. Gap Analysis

A gap analysis between the RMI legal framework and the WB ESSs with respect to environmental and social assessment and management is provided in Table 1. A gap analysis identified several differences between frameworks and gap filling measures have been identified where necessary. Where national legal framework differs from the WB requirements, the project is expected to align to whichever is more stringent.

Table 1: Gap analysis and filling measures[7]

Applicable WB Environmental and Social Standard & associated instrument/s	Relevant RMI Legislation	Equivalence	Gap Filling
ESS1 Environmental and Social Impact Assessment (ESIA) Environmental and Social Commitment Plan (ESCP) Environmental and Social Management Plan (ESMP) Environmental and Social Management Framework (ESMF)	EIA Regs 1994; Earthmoving Regs 1988,1994,1998; Historic Preservation Act 1991	The EIA Regulations require EIAs to be prepared for proposals with potential significant impact. The EIA follows a prescribed format and content, includes extensive and inclusive consultations with all stakeholders, and forms the basis of any approval. Projects remain subject to regulatory and permitting requirements set out in the NEPA, Coast Conservation Act, and the Historic Preservation Act. The prescribed format and content is not as comprehensive as the content of the ESIA set out in ESS1 and therefore there is only partial equivalence. The ESCP and ESMP are not explicitly covered under RMI Legislation. The Earthmoving Regulations require preparation of an erosion and sediment control plan which continues through project construction works but this plan largely focuses on physical aspects relating to erosion and sediment and makes no reference to social impact issues. Common practice is for applicants for major developments to submit an Environmental Management Plan (EMP) with the application. The RMIEPA may impose conditions on approvals. Conditions pre- or post-EIA may include a requirement for an EMP. In cases where a proponent EMP has been drafted prior to the submission of an Earthmoving Permit Application, it may require modification to meet the conditions of approval. No reference to social impact assessment and mitigation.	Both ESS1 and RMI national requirements would need to be followed for the preparation of instruments. Where possible, instruments will be prepared to satisfy both WB and RMI requirements. It is not anticipated that works undertaken by the Project would require an ESIA. An ESMP has been prepared for this Project rather than an ESMF, because the risks and impacts of the Project are able to be determined before project implementation.

[7] Adapted from Republic of the Marshall Islands Urban Resilience Project ESMF

Applicable WB Environmental and Social Standard & associated instrument/s	Relevant RMI Legislation	Equivalence	Gap Filling
ESS2 Occupational Health and Safety Plan Labor Management Procedures Worker Grievance Mechanism	n/a	No legislation in RMI addresses occupational health and safety. Legislation in RMI does not address the labor management issues set out in ESS2, nor is there reference to labor grievance redress mechanisms.	ESS2 requirements will be followed, including preparation of OHS plans and the Project LMP (including worker grievance mechanism).
ESS3 Resource Use Efficiency Plans	EIA Regs 1994; Earthmoving Regs 1988,1994,1998; Coast Conservation Act 1988	Management plans are applicable to a range of operational aspects of development projects. However, these legal instruments are not explicit in terms of which plans must be prepared.	ESS3 and ESS6 requirements will be followed where there are gaps in local legislation.
ESS4 Community Health and Safety Plan	EIA Regs 1994	EIA approval by the RMIEPA is subject to application of practicable alternatives or practicable mitigation measures to substantially lessen significant impacts; and any remaining, unavoidable significant impacts deemed acceptable. Arguably this applies to community threats, however, the EIA Regulations are not explicit in this regard.	ESS4 requirements will be followed where there are gaps in local legislation.
ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	EIA Regs 1994; Earthmoving Regs 1988,1994,1998; Coast Conservation Act 1988	Management plans are applicable to a range of operational aspects of development projects. Current RMI legislation (EIA and Earthmoving Regs, Coast Conservation Act) can be interpreted to provide for pollution prevention and or biodiversity protection. However, these legal instruments are not explicit in terms of which plans must be prepared.	ESS3 and ESS6 requirements will be followed where there are gaps in local legislation.
ESS8 Procedures for protection of Cultural Heritage	Historic Preservation Act 1991	The Historic Preservation Act (HPA), Regulations Governing Land Modification Activities 1991, and Regulations Governing the Disposition of Archaeologically Recovered Human Remains 1991 set out a range of obligations on developers whose earthmoving activities may affect cultural resources.	ESS8 requirements will be followed where there are gaps in local legislation. Provisions have been included in this ESMP to address potential risks and impacts relating to

Applicable WB Environmental and Social Standard & associated instrument/s	Relevant RMI Legislation	Equivalence	Gap Filling
		These obligations include obtaining a permit from the Historic Preservation Office. Approvals under the EIA Regulation are subject to the HPA and associated Regulations.	Chance Find Procedures for infrastructure investments to ensure compliance with ESS8.
ESS10 Stakeholder Engagement Plan	EIA Regs 1994	The EIA Regulations require "extensive and inclusive consultations with all stakeholders." However, there is no prescription of the format of such consultation. The regulations provide that at any time during the permitting process, the RMIEPA may convene a public hearing for the purpose of determining the facts on which to base a decision. They must give adequate notice of the hearing or hearings to the community and provide an adequate opportunity to community members to appear and be heard at such a hearing. Interested persons may also provide written comments and the RMI EPA must give adequate opportunity for this to occur.	ESS10 requirements will be followed where there are gaps in local legislation. Provisions have been included in the Project SEP to comply with ESS10, and national legislation on public consultation, project information disclosure and establishing and maintaining a grievance mechanism.

4. Country Context

4.1. Population

RMI is made up of 29 coral atolls and five isolated islands (only 24 of which are inhabited) with a total land area of 181 km² and an Exclusive Economic Zone (EEZ) of about 2,131,000 km², making it the 19th largest EEZ in the world. About half of its EEZ borders international waters to the north and the other half borders three other nations (Federated States of Micronesia, Nauru and Republic of Kiribati) to the south. The population of RMI was estimated at 42,523 in 2021[8], of which the two largest urban centers, Majuro (the nation's capital) and Ebeye, account for about 23,182 and 8,416, respectively, while the remaining 26 percent of the population reside in rural neighboring islands.

4.2. Economy

RMI is a middle-income country with Gross National Income (GNI) of US$4,940 per capita in 2020[9]. Over the past 15 years, the real Gross Domestic Product (GDP) has grown by a modest 1.5 percent on average per year, with fluctuations in growth related to changes in the construction, public service, and fisheries sectors. The real GDP, however, declined in 2020 by 2.2%[10]. Except for fisheries, the country has limited natural resources. Fisheries' contribution to GDP in 2019 was estimated at 15 percent[11]. Key industries include production of copra and craft items, tuna processing, construction, and tourism. RMI's private sector is responsible for the delivery of most core goods and services. The public sector accounts for around 21.5% percent of GDP.[12]

The COVID-19 pandemic led to a decline in economic returns, contracted domestic activity and productivity, and expected fiscal shocks have been limited by revenue from the fisheries sector and grants from Development Partners[13]. The COVID-19 pandemic is not anticipated to have long-term negative effects on the fisheries sector, however in the immediate term, the decline from tuna export and related vessel services has driven the economy into recession.

The poverty headcount in RMI is estimated at 7.2 percent of the total population based on the 2019-2020 Household Income and Expenditure Survey. About 70 percent of poor households live in rural areas with the remaining 30 percent spread evenly between Majuro and Ebeye. The poverty rate is consequently lowest in Majuro (2.3 percent of individuals) and highest in rural areas (21.2 percent of individuals)[14].

4.3. Fisheries

Marine resources are one of the most precious natural resources of RMI. In particular, the tuna fishery has become an important source of government revenue over the last decade. The fisheries sector contributed about US$31.3 million (which is over 10% of the national government budget) to the country's annual budget in 2020, representing a 7 percent increase over 2019[15] despite the impact of COVID-19. It is an intrinsic part of lifestyle of Marshallese culture and also an important source of employment, subsistence and nutrition. Per capita consumption of seafood in RMI is estimated between 38.9 and 59.0

[8] RMI 2021 Census preliminary data
[9] https://data.worldbank.org/indicator/NY.GNP.PCAP.CD?view=map
[10] https://data.worldbank.org/country/marshall-islands?view=chart
[11] World Bank. 2021. *RMI Country Economic Memorandum and Public Expenditure Review*.
[12] World Bank. 2021. *RMI Country Economic Memorandum and Public Expenditure Review*.
[13] World Bank. 2021. *RMI Country Economic Memorandum and Public Expenditure Review*.
[14] World Bank. 2021. *RMI Country Economic Memorandum and Public Expenditure Review*.
[15] MIMRA Annual Report (2020)

kg per person per year[16]. According to RMI 2021 census report, it is a vital employment category for the 15 to 24 age group, compared to the whole working age population[17]. This alludes to the importance of fisheries as an employment and income generating sector.

4.4. Natural Hazards and Climate Change

RMI faces a high risk of cyclones, and the low-lying islands are susceptible to coastal floods and tsunamis whilst extreme heat and drought conditions have recently affected the islands. The climate risk in RMI is high due to the combination of economic and physical vulnerability and the islands' proneness to natural hazards which is further exacerbated by climate change and variability[18].

RMI is facing increasing exposure and extreme vulnerability to the impacts of climate-change induced natural hazards such as high risk of cyclones, sea level rise, saline intrusion, floods, and recently heat waves and droughts. These are further exacerbated by very high population density, particularly in Ebeye and Majuro. As a result of climate change, biodiversity and the natural environment of RMI would face extreme pressure, with potential loss of some fish, coral, bird, and terrestrial species in the event of no effective conservation measures.

Healthy coral reefs, seagrass beds, mangroves and coastal wetland habitats provide a vital role in climate resilience and adaptation by offering protection from increasing threats from sea level rise, floods and storm events, and help mitigate climate change through carbon sequestration. Coastal ecosystems in the PICs further produce some of the world's most significant marine biodiversity, yet ecosystem health is diminishing with decrease in water quality from erosion, runoff, and marine pollution, as monitored and reported by the 2020 State of the Environment in the Pacific Islands Regional Report. Degradation of lagoon, reef and essential coastal fish and shellfish habitats, all contribute to reduce the natural productivity of aquatic living resources and the safety of seafood products. Support to customary and co-management arrangements, as well as to improved local government extension services, local access to national Government funding and resources, and livelihood diversification in the fish value chains and beyond, through Social Protection systems and financial services, can help improve the effectiveness of coastal fisheries management measures, help cushion their potential short-term impacts, help develop environmental and economic resilience, and help release full potential of coastal fisheries for long-term contribution to national and communities' wellbeing.

4.5. Gender Issues

The RMI Government developed a National Gender Mainstreaming Policy[19] to 'guide the process of developing laws, policies, procedures and practices that will address the needs, priorities and aspirations of all women and men and effectively eliminate all forms of discrimination and inequality'. The policy notes that 'Gender equality is enshrined and included in traditional and cultural practices of the Marshallese people'. The policy and other related documents include an overview of gender issues in the RMI. These include:

- **Gender-based violence.** The National Gender Mainstreaming Policy notes that 'Gender-based violence is a challenge that is complicated by some social practices, some cultural beliefs, and a lack of institutional support and agencies to provide temporary relief or shelter.' While up-to-

[16] Gillett, R. D. (2016) Fisheries in the Economies of Pacific Island Countries and Territories
[17] The Republic of Marshall Islands 2011 Census Report
[18] Climate Risk Country Profile: Marshall Islands (2021): The World Bank Group
[19] GoRMI, National Gender Mainstreaming Policy, 2016

date, reliable GBV data is lacking, a Family Health and Safety Survey conducted in 2014[20] revealed that the prevalence of GBV was high, with:

- 69% of women experiencing physical or sexual violence in their lives
- 16% of women had experiencing physical violence in the 12 months
- 38% of younger respondents (aged 15–24) already experiencing partner violence in their lifetimes
- 10% of women having experienced sexual violence by a non-partner.

The survey also revealed that found attitudes towards domestic violence, from the perspective of both men and women, serve to perpetrate the prevalence of domestic violence. Nearly three-quarters of women believed that a man is justified in beating his partner if she disobeys him or finds out she has been unfaithful. More younger respondents agreed with this, with 83% agreeing with statements justifying a man's hitting his partner.

- **Health:** Health services for sexual and reproductive health are available, however, access issues remain, particularly in rural areas and outer islands[21]. The rate of teenage pregnancy in RMI is high, accounting for over 20% of live births[22]. As explained in the 'Stocktake of the Gender Mainstreaming Capacity of Pacific Island Governments', teenage pregnancies can inhibit young women from pursuing further education and it places added burden on extended families to financially support young mothers.[23]

- **Education:** The gender balance in primary and secondary level education is fairly equal, although some concern has been raised regarding girls dropping out of secondary and tertiary education due to pregnancy and socio-cultural expectations[24]. Financial status appears to influence educational attainment among women, with completion of secondary education being 5% from the poorest households and 22% from the wealthiest households.[25]

- **Employment**: The National Gender Mainstreaming Policy states that 'women's economic empowerment remains a key challenge, as women continue to face limited job opportunities and remain underrepresented in management positions'. For example, the workforce participation rates for men and women as per the 2011 census were 65% and 35%, respectively[26]. The policy document noted that while there is a growing number of women in the public service, men dominate most senior positions.

  There is little or no data on gender issues related to coastal fisheries despite women's considerable contribution to the fisheries sector in the country and region, and the need for a

[20] https://pacific.unfpa.org/en/news/launch-standard-operating-procedures-clinical-management-rape-sexual-violence-and-gender-based
[21] https://pacificwomen.org/wp-content/uploads/2017/09/rmi-gender-stocktake1.pdf
[22] GoMI and UNICEF 2003, as cited in https://pacificwomen.org/wp-content/uploads/2017/09/rmi-gender-stocktake1.pdf
[23] https://pacificwomen.org/wp-content/uploads/2017/09/rmi-gender-stocktake1.pdf
[24] GoMI-UNDP 2005, as cited in https://pacificwomen.org/wp-content/uploads/2017/09/rmi-gender-stocktake1.pdf
[25] EPPSO 2007, as cited in https://pacificwomen.org/wp-content/uploads/2017/09/rmi-gender-stocktake1.pdf
[26] https://www.doi.gov/sites/doi.gov/files/uploads/RMI-2011-Census-Summary-Report-on-Population-and-Housing.pdf

gender and fisheries assessment in RMI was identified by the Pacific-European Union Marine Partnership [27]. The fisheries industry has the potential to be a large employer of women. Before its closing in 2004, the major loining company in RMI Philippines Micronesia and Orient Processing plant, at its peak employed 580 employees, with 85 per cent of them being women.

- **Decision-making.** The policy document notes that 'leadership positions are still thought of as men's roles, and this view is reflected in all aspects of political, civic and family functions'. Women's representation in the Marshallese parliament and other high-level decision-making and management positions is low. In 2016, the RMI elected the first female president, Hilda Heine. While this is a step forward in the integration of women into leadership, at present only 2 of the 33 seats in the Nitijela (parliament) are held by women.[28]

5. Environment and Social Risks, Potential Impacts and Mitigation

The Project is being implemented to strengthen regional collaboration and national capacity for sustained socio-economic contributions of the oceanic and coastal fisheries sector in the Marshall Islands, which is thus expected to result in long-term positive environment and social impacts. In the short to medium term, however, environmental and social risks are assessed to be Moderate and require management.

Project activities have been grouped by activity type based on the potential for environment and social impacts. The activity type categories used are:

- civil works/renovations
- procurement of equipment and technology
- undertaking of feasibility and other studies
- technical advisory, training and capacity development activities

The potential impacts, mitigations measures and proposed monitoring for each activity type are provided in the following sections.

In addition to the risks identified in the following sections, the WB team will screen E&S risks associated with activities that have that already been undertaken and will be financed retroactively. The screening will comprise of a due diligence check/audit on activities already funded to check they have complied with ESF requirements before funds for these activities are disbursed. Activities are likely to include stakeholders and community engagement, preparation of technical options to inform design, and preparation of project documentation including safeguards documentation.

5.1. Civil Works and Renovations

5.1.1. Introduction

Project investments relating to civil works/ renovations are:

- Rehabilitating, repairing and upgrading MIMRA's outer island assets that support value addition. (Subcomponent 3.2). The assets tentatively identified are described in Appendix 1. An assessment of existing facilities will be conducted, and activities will be prioritized based on the outcome of this assessment. The renovations are intended to be minor works to make each

[27] PEUMP website (internal report – unpublished)
[28] https://www.worldbank.org/en/news/feature/2021/03/05/kitlang-kabua

asset fully functional, improve health and safety and security, and upgrade the fit-out with enhanced equipment. Due to budget limitations, construction of new buildings is excluded from this activity. Where an existing asset is in irretrievably poor condition, alternative options will be considered which may include removal of the existing asset to make the site safe, finding an alternative building to renovate, using demountable buildings, and/or upgrading other available. Works will not be undertaken in or over water.

- Implementation of recommendations from an audit of MIMRA infrastructure and operations for energy efficiency, decarbonization and climate-proofing at the MIMRA headquarters in Majuro (Figure 1) (Subcomponent 1.3).

Figure 1: MIMRA headquarters in Majuro

The risks and impacts from these activities are expected to be typical construction-related impacts/risks managed through conventional environmental risk management approaches. These include risks and impacts related to:

- Waste management
- Erosion and sedimentation
- Dust, noise and traffic
- Occupational health and safety
- Community health and safety
- Minor nuisance from construction works (e.g., noise, dust, traffic deviations, access restrictions, etc).

5.1.2. Environmental and Social Risk Screening

Although high or substantial risks are not envisioned within the scope of the Project and its sub-projects, sub-projects relating to civil works/ renovation activities will be initially screened using the following process to confirm this. The screening will be undertaken by PMU in consultation with the CIU E&S team, to determine their associated level of E&S risk, with activities rated Low, Moderate, Substantial and High

as set out in Appendix 2[29] and management plans prepared accordingly by PMU/CIU and Contractor/s as summarised below.

Screening for works other than civil works / renovation activities is addressed in Section 6 of the ESMP.

Step 1	At the time of preparing bid documents, each construction activity shall be screened and categorized (see Appendix 2 of this ESMP), with a determination whether the associated risk is Low, Moderate Low, Substantial or High. Substantial or High Risk projects to be redesigned and rescreened to reduce the risk to Low or Moderate. Responsibility: PMU in consultation with CIU E&S Team
Step 2	Prepare required CESMP (see Appendix 3 and Appendix 4 of this ESMP) for approval as appropriate by WB Task Team and CIU E&S Team. Responsibility: Contractor obligation to prepare CESMP; Review and approval by PMU in consultation with CIU E&S Team and WB Task Team.
Step 3	Implementation – monitoring, reporting and remedial measures as per approved CESMP. Responsibility: Contractor obligation to implement CESMP; Monitoring, supervision and reporting by PMU in consultation with CIU E&S Team.

Step 1: Screening Review and Determination of E&S Risk Management Instruments

PMU Project Coordinator to advise CIU E&S Team that specific civil works, construction and/or renovations are being developed and request the CIU E&S Team to undertake screening.

- Activities associated with each sub-project and associated elements will be screened by the CIU Safeguards Team (with the support of the PMU Project Coordinator or delegate) using the simplified screening checklist set out in Appendix 2 to assess whether the building works will create any of the environmental and social risks identified in Table 2 or new risks.
- This screening shall be undertaken at the point at which bidding documents, including Terms of Reference (TOR), are prepared for the building works, and screening shall be completed prior to finalization of bidding documents. This will ensure all relevant matters can be taken into account when bidding documents are finalized.
- Primary environmental focus will be on activities with externalities such waste; primary social impact focus will be on activities giving rise to adverse impacts on individuals or communities.

[29] From World Bank. 2019. Bank Directive. Environmental and Social Directive for Investment Project Financing.

- Any new impacts not already identified in the ESMP, LMP and/or SEP shall be noted and evaluated against the WB ESSs, and associated mitigation measures shall be developed.
- If screening indicates potential impacts are Substantial or High risk, sub-project elements to be redesigned if practicable and rescreened by the PMU Project Coordinator in consultation with the CIU E&S Risk Team, to reduce the risk back to a Low or Moderate rating. If the sub-project cannot be designed to reduce risk to Low or Moderate, the sub-project will not be supported as the Project will not support Substantial and High risk subprojects or activities.

Specific clauses may be required to ensure mitigation measures from Table 2 are included in the bidding documents.

After each element is assessed in Step 1 against the impacts identified in Table 2 of this ESMP and associated mitigation steps, determination is made if a Contractor Environmental and Social Management Plan (CESMP) is to be prepared.

Step 2: Preparation and Approval of CESMP and Attach to Bid Documents

For Project activities or works categorized as Low Risk AND where all risks are assessed as less than minor no explicit E&S documentation will be required.

For Low Risk works, the CIU will prepare CESMP[30] template based on the 'Contractor ESMP Template – for Low Risk Works' provided in Appendix 3**.** This will not need to be reviewed by WB or disclosed.

For works with a Moderate Risk, the 'Contractor ESMP Template – for Moderate Risk Works' provided in Appendix 4 will be used. The Contractor, with advice of the CIU E&S Team and PMU, will prepare a CESMP (using the template in Appendix 4) for submission to the WB for clearance. Once cleared, the CIU will proceed with disclosing the instruments locally. Disclosure is intended to support the decision making by RMI and the WB by allowing the public access to information on the environment and social aspects of projects. The WB will also disclose the same instruments on its website. The Contractor will be required to complete the CESMP (including reference to induction/training of staff) and obtain clearance from CIU before commencing works.

Works with a Substantial or High Risk are to be redesigned and rescreened to reduce the risk back to Low or Moderate.

For all works, the relevant CESMP Template will be appended to Bid Documents.

Step 3: Implementation and Monitoring

Projects are implemented according to CESMP and supervised by the CIU E&S Team with the support of the PMU. Progress will be monitored and reported to the WB on:

- compliance with measures agreed with the Bank on implementation of any CESMP, as set out in the project documents
- the status of mitigation measures, and
- the findings of monitoring programs.

[30] For low risk works CIU will provide a CESMP for use by contractor with supervision and monitoring as low risk works will generally be undertaken by local building contractors who will not have the capacity to prepare a CESMP but will be required to follow requirements of a generic one provided by CIU.

5.1.3. Risk Mitigation Measures

Potential impacts/risks, mitigations measures and proposed monitoring for civil works, construction and renovations are provided in Table 2.

Table 2: Potential impacts/risks, mitigations measures and proposed monitoring - civil works/renovations

Risks and Impacts	Mitigation Measures	Responsibilities
Planning and Design Stage		
Design of facilities do not meet layout and engineering requirements or consider potential operational OHS and environment risks	Consultation with end-users in accordance with the SEP to ensure design of proposed facilities are fit-for-purpose and takes into consideration operational risks such as OHS, liquid and solid waste disposal, potential for minor spills/leaks, etc.	MIMRA to include in design consultant's scope
Design of facilities do not meet building codes	Design facilities, if required, to meet the National Building Code.	MIMRA to include in design consultant's scope
Design of facilities do not meet requirements for people with disabilities	Consideration of access for people with disabilities in building design (e.g. ramps, bathrooms with facilities for people with disabilities, etc), consultation with people with disabilities in accordance with the SEP to ensure design meets needs.	MIMRA to include in design consultant's scope
Design of facilities do not consider security (including prevention of GBV)	Consideration of personal and asset security in building design (e.g., fencing, lighting, etc.), consultation in accordance with the SEP.	MIMRA to include in design consultant's scope
Facilities not holding appropriate permits	Obtain required permits and/or licenses under the National Environmental Protection Act from RMIEPA, if required.	MIMRA
Renovation Stage		

Risks and Impacts	Mitigation Measures	Responsibilities
Waste management. Erosion and sedimentation. Occupational health and safety Community health and safety (including Gender Based Violence, Sexual Exploitation, Abuse, Harassment and Violence against Children) Minor nuisance from construction works (e.g., noise, dust, traffic deviations, access restrictions, etc) Management of hazardous materials Worker access to toilet and handwashing facilities	Implementation of Contractor Environmental and Social Management Plan (CESMP) – details provided in Appendix 3/4. CESMP to address: • Health and Safety (OHS) Procedures – details provided in Appendix 3/4. • Contactor Waste Management – details provided in in Appendix 3/4. • Traffic management – details provided in in Appendix 4. • Asbestos management – details provided in Appendix 3/4. • Stakeholder engagement and grievance redress to enable the uptake and management of any grievances during construction. • Process for Implementation of LMP, including Code of Conduct for workers.	Environmental and social risk screening to be undertaken by CIU E&S Team. CESMP to be prepared by CIU E&S Team prior to works commencing. WB approval of CESMP for Moderate risk activities Contractor to finalize and implement CESMP (LMP, OHS Procedures, Waste Management Plan, GM).
Operations Stage		
Safety and environmental risks associated with operation of the laboratory	MIMRA to develop Standard Operating Procedures (SOPs) for operation of the laboratory that include topics such as hazardous materials management, waste management, safety (including provision of PPE) and emergency response.	MIMRA
Safety and environmental risks associated with operation of the fish bases and markets	MIMRA to develop Standard Operating Procedures (SOPs) for operation of the fish bases and market include topics such as community health and safety.	MIMRA

5.2. Procurement of Equipment and Technology

Project investments relating to procurement of equipment and technology are:

- Providing equipment, software, training, engagement and capacity development to complete the establishment and implementation of the Competent Authority and the new seafood toxicology laboratory at MIMRA (Sub-component 1.2).
- Renewing and enhancing ICT infrastructure for MIMRA headquarters (including videoconference system, network and backup systems, hardware, security and monitoring systems) and the Fish Base and Aquaculture sites (Sub-component 1.3).
- Improving connectivity for real-time transmission of Observers and Port Monitors' data into MIMRA's information management system (Sub-component 2.1).
- Testing commercially available technologies for monitoring vessels for compliance in collaboration with regional organizations to improve data provision and monitoring at regional and national level (Sub-component 2.1).
- Acquisition of feed analysis equipment to support nutrient analysis and other equipment for local aquaculture activities (Sub-component 3.2).
- Providing baseline equipment to communities to support existing giant clam farming operations (Sub-component 3.2), (may include basic items such as materials to build cages, growing sheets, and other basic setup requirements).

The risks and impacts from these activities primarily relate to:

- Generation of waste (e-waste, packaging, old safety equipment, etc).
- Occupational health and safety.

Aquaculture operations also have potential to reduce marine water quality and alter habitat, however small-scale community giant clams are unlikely to result in marine water quality impacts leading to degradation of ecosystems or ecosystem services. Providing assistance to community farming of giant clams may have a positive impact on natural stocks by reducing exploitation, and therefore improve the sustainability of the fishery in RMI.

Potential impacts/risks, mitigations measures and proposed monitoring for the procurement of equipment and technology are provided in Table 3.

Table 3: Potential impacts/risks, mitigations measures and proposed monitoring - procurement of equipment and technology

Risks and Impacts	Mitigation Measures	Responsibilities
Resource efficiency issues Land and/or water pollution from improper waste disposal	Solid waste (e.g., derelict FADs, laptops, monitors, keyboards, radios, phones, cabling, modems, life jackets, packaging, etc) shall be sent back from Neighbouring Islands to Majuro as necessary and disposed of in the following order of preference: (1) reused, (2) refurbished, (3) recycled, (4) sent to an authorized overseas facility (due to limitations with landfills in RMI). MIMRA to provide guidance to aquaculture facilities in receipt of equipment and materials on appropriate disposal of waste (e.g., packaging, etc) and provide support for such disposal, if required (e.g., packaging that cannot be reused onsite could be sent back to Majuro on vessel that delivers the equipment).	Contractors MIMRA / aquaculture facilities
Equipment procured does not meet end-user requirements	Consultation with end-users (e.g., aquaculture facility managers) to ensure items procured are fit-for-purpose.	MIMRA to include in activity-specific Stakeholder Engagement Action Plans (SEAPs) for this scope of work
Equipment procured does not comply with safety standards	Safety standards for equipment to be included in bidding documents and provided to recipients where appropriate.	MIMRA and PMU
Inadvertent support of aquaculture operations that do not have appropriate licences/permits[31]	Include copies of relevant aquaculture licences for facilities proposed to be in receipt of the giant clam farming, aquaculture feed analysis, and other equipment in the study TORs to be provided to the CIU.	MIMRA to source and provide to CIU for check
Occupational Health and Safety (OHS) risks for contractors	The contractor(s) undertaking works shall comply with good practice regarding workers' safety, such as OHS section of the IFC EHS Guidelines on Construction and Decommissioning, and implement the following at a minimum: • Develop and follow a site-specific occupational health and safety (OHS) procedures that are compliant with the World Bank Environment and Health and Safety Guidelines (EHSGs) and local regulations. OHS Procedures to cover risks associated with COVID-19 (see Appendix 7). OHS procedures must be submitted to the CIU for approval prior to any physical works commencing • Appoint a health and safety officer at site, who will have the authority to issue directives for the purpose of maintaining the health and safety of all personnel authorized to enter and or work on the site	Contractor to prepare and implement OHS procedures. CIU to review/approve contractor-OHS procedures. CIU/PMU to confirm Contractor has appointed dedicated health and safety office.

[31] Project is not currently proposing to provide funding support for licencing.

Risks and Impacts	Mitigation Measures	Responsibilities
	• Prepare and implement a simple action plan to cope with risk and emergency (e.g., fire, storm surge, cyclone, COVID-19 outbreak) • Complete different levels of risk assessment, i.e. from whole Job Safety Analysis down to the personal level, to identify any potential hazards, rank the risks, and identify ways to eliminate, control or minimize the hazards • Ensure all personal have the appropriate licences (if required) for their scope of work • Provide project workers with accessible means to raise workplace concerns as outlined in the LMP.	
Safety risks associated with vessel use. Risk of spills during refuelling.	MIMRA to comply with the RMI Domestic Water Craft Regulations for use of larger vessels[32] that cover registration, safety (including provision of safety equipment such as lifejackets lights first aid kits spare parts) and emergency communications equipment for boats travelling outside lagoons. For use of Small Boats[33], MIMRA shall follow the provisions of the MIMRA Small Boat Safety Standard Operating Procedure (Appendix 9).	MIMRA

[32] Boat or ship fitted with inboard engine and/or vessel greater in length than 27 feet (Group II and III of the Water Craft Regulations).
[33] Any boat less than or equal to 27 feet in length and fitted with an outboard engine (Classified Group I and II under Water Craft Regulations).

5.3. Feasibility and other Studies

Project investments relating to the undertaking of feasibility and other studies include:

- Consultancies to inform fishing access negotiations, market access, domestic development and building legal capacity for coastal fisheries (Sub-component 1.1).
- Assessment and development of integrated data collection and processing systems for their automation and enhanced information (Sub-component 1.1).
- Annual assessments of fish marketing flows from all sources, and regular collection and analysis of fish consumption data for the development of human health guidelines (Sub-component 1.1).
- Determination of secure and optimized data collection systems and information retrieval, and related equipment, for remote sites, including Reimaanlok sites (Sub-component 1.1).
- Assessing and developing a management regime for pollution sources within Majuro Lagoon (Sub-component 1.2)
- Audit of MIMRA infrastructure and operations for energy efficiency, decarbonization and climate-proofing (Sub-component 1.3).
- Conducting consultancies and a study tour for the establishment of an ePort system for Port State Monitoring obligations (Sub-component 2.1).
- A gap analysis on the domestic industry to improve infrastructure and systems for compliance with new Fish Processing and Export Regulations to enhance access to premium markets (Sub-component 2.2).
- Potential studies on by-catch and production of locally based fish meal (Sub-component 2.2).
- A feasibility and costing study to establish and operate a research station on Arno focused on research of marine atoll ecosystem health and recovery (Sub-component 3.1).
- Feasibility study on the fabrication of biodegradable FADs, that will investigate design, construction, maintenance and deployment of FADs, and end-of-life disposal (Sub-component 3.2).
- Carrying out study on promoting the utilization of local anchored FADs (Sub-component 3.2).
- Developing and implementing aquaculture development strategy/recommendations to strengthen MIMRA's engagement with local government and communities on aquaculture potential (Sub-component 3.2).
- Conducting a production and market feasibility study for key coastal fisheries and aquaculture species to inform communities of value, opportunities and investment needs related to these species (Sub-component 3.2).
- Carrying out studies to identify income generation opportunities in coastal fisheries value chains to support livelihood diversification (Sub-component 3.2).

- Financing consultant services for studies to improve the management and subsequent harnessing of coastal and oceanic fisheries and their value chains to RMI's economy, and promotion of environmental protection (Component 4).

The risks and impacts from these activities primarily relate to:

- Occupational health and safety.
- Adequacy of consultation.
- Community health and safety.

The use of FADs is also subject to controversies. The Project, as part of Subcomponent 3.2, will encourage the use of anchored FADs by small scale fishers. Drifting FADs, used by industrial fleets, are more controversial as they aggregate juvenile fish and fishing gear is not selective. Gear used around anchored FADs are more selective. Anchored FADs reduce emissions and waste from boats searching large areas for stocks, contribute to improved sea safety, and reduce pressure on coastal fish stocks. FADs are a source of reef\beach pollution in RMI when they become detached from their mooring. A separate activity, also under Subcomponent 3.2, will investigate the potential for fabrication of biodegradable FADs, which has the potential to reduce reef/beach pollution from FADs.

Potential impacts/risks, mitigations measures and proposed monitoring for undertaking feasibility and other studies are provided in Table 4.

Table 4: Potential impacts/risks, mitigations measures and proposed monitoring - feasibility and other studies

Risks and Impacts	Mitigation Measures	Responsibilities
Studies do not include appropriate consultation component leading to study findings missing key information (e.g., input from vulnerable groups)	Terms of reference (TORs) for each scope of work to include consultation component and requirement to prepare activity-specific SEAP. TORs and SEAP to be reviewed by the CIU.	MIMRA to prepare TORs. Consultant to prepare activity-specific SEAP. CIU to review TORs and activity-specific SEAP.
Feasibility studies (and other studies where applicable) do not consider E&S requirements of the future project financiers / donors	TORs for studies to include the requirement for a high-level assessment of potential E&S risk/impacts in alignment with E&S requirements of the future project potential financiers/donors. TORs to be reviewed by the CIU (and in some cases, the WB). Aquaculture studies shall not support/recommend the introduction of invasive species.	MIMRA to prepare TORs. CIU to review TORs. WB to review TOR for scopes relating to FADs and aquaculture
Safety risks associated with undertaking studies (e.g., vessel use, scuba diving, remote work, COVID-19 transmission, etc)	TORs for studies to include requirements for preparation of SOPs and/or Job Hazard Analyses to cover fieldwork aspects of the scope. TORs and prepared safety documents to be reviewed by the CIU. MIMRA to follow existing Vessel Safety Protocols including the RMI Domestic Water Craft Regulations for larger vessels[34] and for small boats[35], MIMRA shall follow the provisions of the MIMRA Small Boat Safety Standard Operating Procedure (Appendix 9).	MIMRA to prepare TORs as necessary and follow existing Vessel Safety Protocols. Consultant to prepare SOPs and/or Job Hazard Analyses. CIU to review TORs and consultant-prepared safety documents.
Gender Based Violence, Sexual Exploitation, Abuse, Harassment and Violence against Children	Implementation of LMP, including Code of Conduct (CoC) for workers. Orientation training to include expectations for workers with respect to Gender Based Violence, Sexual Exploitation, Abuse, Harassment and Violence against Children (in line with contents of CoC). Implementation of Worker GRM and Project GM.	Consultant to implement LMP including Health and Safety and adherence to CoC. CIU E&S Team to provide orientation to workers.

[34] Boat or ship fitted with inboard engine and/or vessel greater in length than 27 feet (Group II and III of the Water Craft Regulations).
[35] Any boat less than or equal to 27 feet in length and fitted with an outboard engine (Classified Group I and II under Water Craft Regulations).

5.4. Technical Advisory, Training and Capacity Development Activities

Project investments relating to technical advisory, training and capacity development activities include:

- Recruitment of:
    - Fisheries Inspectors to support the operations of the Competent Authority, including equipping them with communication equipment (Sub-component 2.1)
    - Coastal Fisheries Data Analyst to identify coastal data collection priorities, analysis of data and the dissemination of findings to inform fisheries management (Sub-component 3.1)
- Monitoring ciguatera, in particular in reef fishes in remote locations, through trialling protocols and establishing more comprehensive testing capacity at the main MIMRA laboratory (Sub-component 1.1).
- Training and capacity development opportunities for MIMRA staff to meet current and future regional and national obligations (Sub-component 1.1).
- Strengthening and expanding the Reimaanlok network (Sub-component 3.1). This will involve support through trainings for communities, boat chartering and travel expenses and financing implementation in currently established sites, with provision to expand to new sites, up to 5 atolls per year in line with the community-driven development approach.
- Strengthening compliance in coastal areas through engaging a Coastal illegal, unreported, and unregulated (IUU) consultant to improve awareness and communications with local governments and communities in identifying and responding to blue boats, dark vessels and other IUU activities (Component 3.1).
- Project Management, including technical and operational assistance works, goods, services, workshops, and operational costs to support day-to-day management and implementation of the project (Component 4).

The risks and impacts from these activities primarily relate to:

- Generation of solid waste
- Occupational health and safety
- Community health and safety
- Labor management.

Potential impacts/risks, mitigations measures and proposed monitoring for technical advisory, training and capacity development activities are provided in Table 5.

Table 5: Potential impacts/risks, mitigations measures and proposed monitoring - technical advisory, training and capacity development

Risks and Impacts	Mitigation Measures	Responsibilities
Resource efficiency issues Land and/or water pollution from improper waste disposal	Electronic waste (e.g., laptops, monitors, keyboards, radios, phones, cabling, modems, etc) shall be sent back from Neighbouring Islands to Majuro as necessary and disposed of in the following order of preference: (1) reused, (2) refurbished, (3) recycled, (4) sent to an authorized overseas facility (due to limitations with landfills in RMI).	MIMRA
Safety risks associated with undertaking works (e.g., vessel use, remote work, COVID transmission, laboratory work, etc)	Terms of reference (TORs) for studies to include requirements for preparation of Standard Operating Procedures (SOPs) and/or Job Hazard Analyses (JHAs) to cover fieldwork aspects of the scope and laboratory work, including any training requirements. TORs and prepared safety documents to be reviewed by the CIU. MIMRA to follow existing Vessel Safety Protocols including the RMI Domestic Water Craft Regulations for larger vessels[36] and for small boats[37], MIMRA shall follow the provisions of the MIMRA Small Boat Safety Standard Operating Procedure (Appendix 9).	MIMRA to prepare TORs as necessary and follow existing Vessel Safety Protocols. Party conducting works to prepare SOPs and/or Job Hazard Analyses. CIU to review TORs and consultant-prepared safety documents.
Gender Based Violence, Sexual Exploitation, Abuse, Harassment and Violence against Children	Implementation of LMP, including Code of Conduct for workers; awareness training.	Party conducting works (MIMRA and/or consultant).

[36] Boat or ship fitted with inboard engine and/or vessel greater in length than 27 feet (Group II and III of the Water Craft Regulations).
[37] Any boat less than or equal to 27 feet in length and fitted with an outboard engine (Classified Group I and II under Water Craft Regulations).

6. Risk Management Process for Activities other than Civil Works, Construction and Renovations

Sub-activity works other than civil works, construction and renovations[38] will go through a simple screening and assessment process. The process is as follows:

Step 1. Terms of Reference (TOR) for all studies and works other than civil works, construction and renovations will be reviewed by CIU E&S Specialists and WB E&S specialists prior to procurement notification. This review will ensure that TOR in each case make appropriate reference to:

- E&S risks.
- Mitigations specified in Section 5 of this ESMP.
- Project E&S instruments.
- Contractor/task specific plans that are required (e.g., OHS Procedures, SOPs/JHAs, Waste Management Plans and activity-specific SEAPs).
- Applicable standards where relevant.

Step 2. Each proposal received will be reviewed by the CIU E&S Specialists to verify that proponents have adequately addressed E&S risk and measures set out in the TOR as appropriate. This will include a review of contractor/task specific plans where applicable. The CIU E&S Specialists will advise the PMU in writing of any concerns or issues.

Step 3. Project procurement will ensure E&S concerns or issues raised by CIU E&S Specialists are fully accounted for in the selection process.

Step 4. All deliverables are to be reviewed and approved by the CIU E&S Specialists and WB E&S specialists to determine adequacy of attention to E&S risks.

[38] Civil works, construction and renovations are addressed in Section 5.1 of this ESMP.

7. Incident Management

Despite efforts to manage environmental and social risks, there is potential for incidents to occur. An incident is defined as an accident or negative event resulting from failure to comply with the WB E&S requirements, or conditions that occur because of unexpected or unforeseen events during project implementation.

The Project will adopt the incident response procedure (Appendix 8) and summarized in Figure 3.

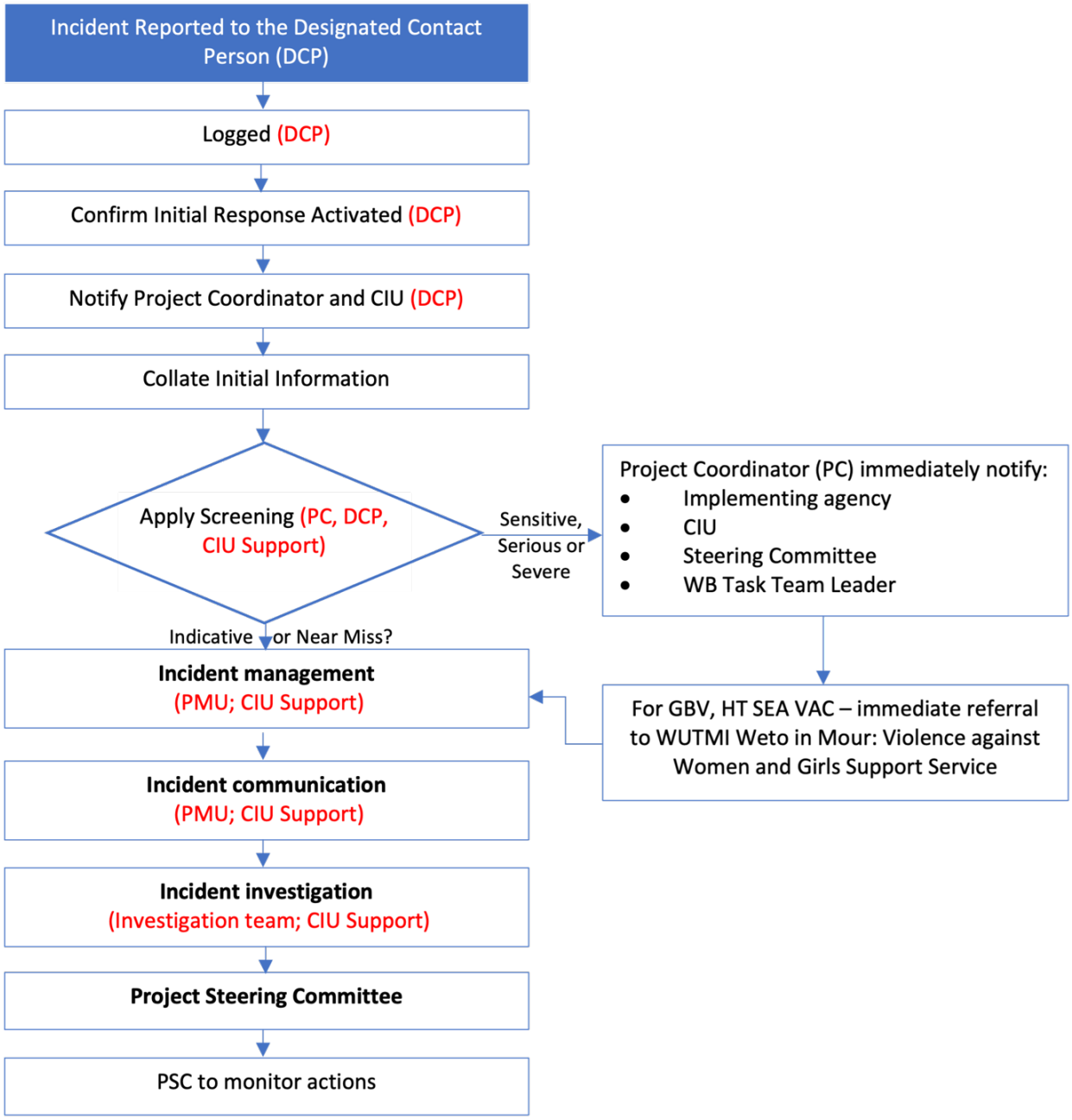

Figure 2: Incident Response Procedure

8. Stakeholder Engagement

A stand-alone SEP has been developed to describe the Project's program for stakeholder engagement, public information disclosure and consultation. The SEP outlines the ways in which the project team will communicate with stakeholders and provides a mechanism through which people can raise concerns, provide feedback, or make complaints about the project or any activities related to the project. A summary of the SEP is provided in the following sections. In the event of discrepancy between this summary and the SEP, the SEP takes precedence.

8.1. Stakeholder Identification and Analysis

Stakeholder analysis determines the likely relationship between stakeholders and a project and assists to identify the appropriate consultation methods for each stakeholder group during the life of the project. Stakeholders of projects can typically be divided into the following categories:

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence that are directly influenced (actually or potentially) by the Project and/or have been identified as most susceptible to change associated with the Project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. This also includes stakeholders that contribute to the execution and implementation of a project.
- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the Project and/or who could affect the Project and the process of its implementation in some way.
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the Project as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the Project. The vulnerability may stem from a person's origin, gender, age, health condition, economic and social status, access to land, natural resources, level of voice and influence in decision-making processes etc.

Stakeholders identified for the Project and their interest in the project are provided in Table 6.

Table 6: Stakeholders and their interest in the Project

Group	Organization	Interest in the Project
Affected parties		
RMI Government departments and organizations	Ministry of Finance	Executing agency
	Marshall Islands Marine Resources Authority	Implementing agency
	Centralized Implementation Unit	Providing implementation support
	Ministry of Works, Infrastructure, and Utilities	Providing support in the oversight of civil and construction works
World Bank	International Development Association	Financing agency
People in the project area of influence	Individuals and community groups/organizations/businesses that will directly benefit from the Project, including fishers and aquaculture	These people/groups have the potential to be Project beneficiaries and those near the location of physical works may be

	businesses. Communities involved in the Reimaanlok network.	potentially affected by the social impacts associated with such works (e.g., renovations).
Local governments	Various throughout RMI	Involved in fisheries management
Regional agencies	Pacific Islands Forum Fisheries Agency (FFA)	Involved in tuna fisheries management
Contractors	Various civil works contractors	Potential to be contracted or subcontracted to undertake renovations
Suppliers	Various suppliers	Supply of goods and materials to contractors and/or subcontractors involved on the Project
Consultants	Various consultants	Potential to be contracted or subcontracted to undertake feasibility and/or other studies for the Project
Other interested parties		
Non-Government Organizations	Organizations focusing on topics such as: • Fisheries • Aquaculture • Marine environment protection • Climate change including the Marshall Islands Conservation Society (MICS), and the International Office of Migration (IOM)	Interested in the outcomes and benefits of the Project Interested in collaboration with activities
RMI Government departments and organizations	RMI Environmental Protection Authority	Permitting of select investments (if required)
	Ministry of Health and Human Services	Ciguatera monitoring
Educational institutions	College of the Marshall Islands (departments focusing on aquaculture and marine ecology)	Interested in the outcomes and benefits of the Project Interested in collaboration with activities
Development agencies	Japan International Cooperation Agency	Interested in the upgrade works to the fish bases/sub-bases and markets as JICA funds similar works
Vulnerable groups		
Vulnerable or disadvantaged groups	Including, but not limited to: • elderly • children • youth • poor households • single-headed households • residents in neighboring islands and remote areas • people with disabilities • survivors of, and those vulnerable to GBV, SEA/SH and VAC	These people/groups have potential to be Project beneficiaries, however, there is potential for project benefits to not reach such groups. They may also be disproportionately potentially affected by the social impacts associated with the renovation works and it is important to ensure such people/groups are included in the project planning process through

		mainstreaming or targeted activities.

8.2. Stakeholder consultations during instrument preparation

In addition to discussions with stakeholder agencies during the Pre-Appraisal Mission (Sept 2022), MIMRA and the CIU held meetings with several key stakeholder agencies to review the draft E&S documents and make revisions as required. These meetings took place in August and September 2022 and included staff from the RMI Environmental Protection Agency (RMI EPA), the Ministry of Public Works, Infrastructure and Utilities (MWIU), the Marshall Islands Conservation Society (MICS), Women United Together Marshall Islands (WUTMI) and with MIMRA staff and volunteers responsible for implementation of the Reimaanlok Framework. A list of meeting participants and summary of meeting outcomes can be found in the PROPER SEP.

8.3. Stakeholder Engagement Plan Summary

A summary of the proposed stakeholder engagement and disclosure activities are provided in Table 7. This builds on from the engagement that was undertaken during the previous PROP Project and the relationships that MIMRA built with stakeholder during its implementation. In addition to these proposed engagement activities, the PMU will prepare an annual Stakeholder Engagement Action Plan (SEAP) as part of the project annual work planning process with takes into consideration lessons learned from previous stakeholder engagement and changes in implementation arrangements. The SEAP will include timelines, responsibilities for facilitating engagements and processes for recording of engagement data. This process will be supported by the CIU E&S Team. As indicated previously, specific project activities that require significant consultation with affected persons will develop a task-specific SEAP prior to the commencement of works which will be reviewed by the CIU.

Table 7: Indicative stakeholder engagement plan and disclosure summary

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
Engagement that is part of the project purpose				
Implementation	Ways to strengthen implementation of the Reimaanlok Framework (e.g., what's working well, lessons learned, areas for improvement, etc)	Focus group discussions	Reimaanlok communities	MIMRA
Implementation	Purpose and scope of Reimaanlok Framework	Focus group discussions	Potential new Reimaanlok communities	MIMRA
Implementation	Co-management approaches to fisheries management and aquaculture	Face-to-face meetings, virtual meetings, focus group discussions	Local governments, local fishers, Pacific Islands Forum Fisheries Agency	MIMRA
Implementation	Illegal, unreported and unregulated	Face-to-face meetings, virtual meetings, focus	Local governments, communities	MIMRA

	fishing nearshore waters	group discussions, posters, brochures.		
Engagement related to physical works being undertaken				
Planning / design	Design of facility upgrade to ensure it will be fit-for-purpose	Face-to-face meetings, virtual meetings, focus group discussions	End-users of facilities being upgraded	PMU
Prior to, during and post physical works	Project scope, progress, timing, and the grievance mechanism	Face-to-face meetings, posters, brochures	Nearby residents and businesses	PMU, civil works contractor
Engagement required to feed into feasibility and other studies				
Various, to be detailed in task-specific SEP to be prepared by study consultant				MIMRA, consultant undertaking study
Engagement to disseminate information about Project progress and results				
Annually throughout the implementation phase	Key project updates and reports on the project's environmental and social performance	Websites (WB, CIU and MIMRA), in person or through provision of brochures to Reimaanlok network communities	All stakeholders	PMU
Disclosure				
Prior to implementation	Disclosure of final E&S Instruments (SEP, ESMP and LMP)	Websites (WB, CIU and MIMRA)	All stakeholders	WB, CIU
Early in implementation phase	Project awareness, E&S instruments, availability of the GM	Face-to-face meetings and community noticeboards	Local governments, fishing communities, Reimaanlok communities	PMU
Prior to commencement of civil works	Disclosure of Contractor EMPs for Moderate Risk activities and GM	Websites (CIU and MIMRA); in person to potentially affected parties (e.g., communities near constriction works) through face-to-face meetings and on community noticeboards.	All stakeholders	CIU, PMU, civil works contractor

8.4. Grievance Mechanism

The GM is a mechanism to receive and facilitate the resolution of stakeholder's concerns, complaints, and grievances about the Project, including concerns relating to environmental and

social impacts and issues. The GM allows stakeholders 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 way. A formal GM (see Stakeholder Engagement Plan) will be implemented by the PMU and will be used for project-related grievances.

9. Implementation Arrangements, Responsibilities and Capacity Building

9.1. Organisation Responsibilities and Structures

9.1.1. MIMRA (Implementing Agency)

MIMRA will be the implementing agency for the Project. MIMRA has extensive knowledge with World Bank policies and procedures, having successfully implemented the PROP Project, albeit this project was not completed under the WB ESF, but under the previous WB Safeguards Policies. MIMRA has established a Project Management Unit (PMU) that will be responsible for the day-to-day management of the Project. The functions of the PMU include:

- financial management
- procurement
- consolidation of workplan and budget
- financial audit
- environmental and social risk management
- monitoring, evaluation and learning.

When required, individual consultants with specific specialized skillsets and preferably familiar with World Bank operations will be recruited to provide support to the PMU. In addition, for the purposes of this ESMP, E&S support will be provided by a PMU E&S Risk Management Officer supported for E&S purposes by the Centralized Implementation Unit (CIU).

To avoid project implementation delay, reduce timeline training new staff, the PROP Project PMU staff have been maintained because of their previous knowledge of WB operations. They are also involved in project preparation. This will ensure they are familiar with PROPER and ultimately lead to smooth transition to implementation. The PMU already has experience in project management, procurement, financial management, E&S management, and monitoring and evaluation, and will remain under the leadership of MIMRA Director.

The key role within the PMU involved in implementation of E&S instruments is the PMU Project Coordinator who has the following responsibilities:

- Prepare TOR for sub-projects.
- Approve the content of any future revisions to the E&S instruments, based on technical review and recommendations by CIU E&S Specialists.
- Implement and monitor all stakeholder engagement strategies/plans for the project.
- Coordinate, facilitate, and where appropriate participate, in face-to-face stakeholder meetings with on-the-ground support from the CIU E&S Specialists.
- Oversee implementation of any recommended environmental and social mitigation measures set out in the E&S instruments.
- Prepare monthly monitoring reports for provision to the WB.
- Helps to resolve any disputes that may arise in the Project, including grievances.

9.1.2. Centralized Implementation Unit

The RMI Ministry of Finance has established a Centralized Implementation Unit (CIU) within the Division of International Development Assistance (DIDA). The CIU contains Procurement, Fiduciary, and Environmental and Social Risk Management expertise, supporting all WB projects in RMI. Project implementation responsibilities in each case remain with the Project Implementation Units (PIUs) or Project Management Units (PMUs) in each case.

For the purposes of this ESMP, the key roles within the CIU are an International Environmental Specialist, an International Social Specialist and two locally based E&S Officers[39], collectively the CIU E&S Team which has the following responsibilities:

- Reviewing TOR for sub-projects.
- Reviewing task-specific E&S instrument prepared for sub-projects.
- Development of CESMP for Low and Moderate-risk building works
- Review any future revisions to the E&S instruments.
- Support the PMU with stakeholder engagement activities including redress of any grievances.
- Supervising physical works, carrying out audits etc., to ensure environmental and social protection and mitigation measures are implemented by contractors.
- Proving training and capacity building support to PMU and contractors on E&S risk management.
- Storing data (including grievance records), collating and interpreting stakeholder feedback and providing details to the PMU and others as necessary.
- Providing E&S reporting on a 6-monthly basis as part of WB reporting.
- Providing support and mentoring to the PMU E&S Risk Management Officer.

9.1.3. World Bank

The WB E&S team will provide regular E&S risk management compliance monitoring and support for the duration of the project, remotely and during missions, and to build capacity for E&S implementation and stakeholder engagement. The WB team will also review the TOR for studies that are of a sensitive nature from an E&S perspective (e.g., related to FADs and aquaculture).

9.1.4. Construction Contractors

Construction contractor(s) will be required to comply with the Project's E&S risk management plans and procedures, including this ESMP and the LMP, as well as local legislations and this will be specified in the contractor's agreements. Contractor(s) will need to disseminate and create awareness within their workforce of E&S risk management compliance and undertake any staff training necessary for their effective implementation.

Contractor(s) will be required to comply with the specified ESMP (i.e., CESMP) and to take all necessary precautions to protect the environment and maintain the health and safety of their personnel and the community. The contractor(s) will appoint a health and safety representative at site, who will have the authority to issue directives for the purpose of maintaining the health and safety of all personnel authorized to enter and or work on the site, to take protective measures to prevent accidents, to ensure suitable arrangements are made for all necessary welfare and hygiene requirements, to undertake worker training.

Construction contractor (s) will provide the PMU weekly updates and monthly reports on E&S risk management through the duration of physical works.

9.2. Capacity Building

The objective of the project (i.e., to strengthen regional collaboration and national capacity for sustained socio-economic contributions of the oceanic and coastal fisheries sector in the Marshall Islands) is focused on capacity building. Specific capacity building activities include recruitment of

[39] At the time of preparing this EMSF, the second local E&S Officer was under recruitment.

additional MIMRA staff (e.g., fisheries inspectors, coastal fisheries data analyst); studies and works to improve information capture and communication, and awareness, and training for MIMRA staff and community members.

With respect to the capacity of MIMRA to implement the WB ESF, it is important to understand that while the previous PMU staff are knowledgeable in WB operations from their experience on the PROP Project, the PROPER Project (unlike the PROP Project) is subject to the WB ESF, and, as such, training is required to provide awareness of the specific requirements of the WB ESF to the PMU. The PMU may need ongoing support, training, and technical assistance to implement the Project E&S documents during project implementation. It is expected that this will be provided by the CIU E&S Team with support from the WB Task Team as required.

9.3. Budget

An indicative budget for implementing the ESMP, LMP and SEP is provided in Table 8. These items are over and above those considered to be covered by normal operations and normal duties of the CIU E&S Team, which are covered by CIU budget. Contractors E&S risk management costs will be incorporated into the Contractor's costs.

Table 8: Implementation budget

Budget Item	Detail	Cost Estimate (US$) per Year
Stakeholder consultations	Catering, venue hire, media, materials, travel and accommodation costs (to visit project sites on outer islands), translation and interpretation services, etc.	15,000
Capacity development training, awareness raising including SEA/SH	Venue, stationery, refreshments, training materials and delivery.	10,000
Monitoring and reporting	Travel and accommodation costs (to visit project sites on outer islands) Report production costs (non-staff costs).	15,000
GM related costs	Personnel, communication, transportation, office support costs include SEA/SH	5,000
Total for 6 years		*270,000*

Appendix 1*:* Outer Island Assets

As part of Sub-component 3.2, the Project will improve MIMRA's existing outer island assets. This will include the rehabilitation, repair, and upgrade of existing MIMRA's outer island assets that support value addition. An assessment of existing facilities will be conducted, and activities will be prioritized based on the outcome of this assessment. The renovations are intended to be minor works to make each asset fully functional, improve health and safety and security, and upgrade the fit-out with enhanced equipment. This would typically include:

- Energy efficient lighting
- Updates to communications and IT equipment
- Solar power systems
- Repair or replacement of staircases and handrails
- Installation of water saving taps and toilets
- Repair of fencing and locks
- Repair or replacement of ice machines, freezers and cold storage units
- Repair or replacement of outboard engines
- Repair or replacement of fuel storage facilities
- Provision or restocking of skill kits
- General building maintenance (painting, repair / replacement of staircases and handrails, fixing leaks, etc).

Due to budget limitations, construction of new buildings is excluded from this activity. Where an existing asset is in irretrievably poor condition, alternative options will be considered which may include removal of the existing asset to make the site safe, finding an alternative building to renovate, using demountable buildings, and/or upgrading other available assets. There will be no works undertaken in or over water (i.e., jetties will not be upgraded). Most activities are expected to be completed by existing MIMRA Works Officers, but more complex activities may require procurement of additional design of upgrades or specialist technicians to install or repair equipment.

The assets that have been tentatively identified for rehabilitating, repairing and upgrading are fish bases and sub-bases; and markets. These are described in the following sections.

Fish Bases and Sub-bases

The fish bases and sub-bases at Jaluit, Wotje, Likiep, Maloelap, Aur, Arno (Arno Fish Base & Ine Sub-fish base), Namu and Ailinglaplap have been identified for rehabilitation, repair and upgrade by the Project. These are central facilities where the fishers can bring their catch for bulk sale and transport to more populated areas (e.g., Majuro and Ebeye). The fish bases play an important role in bringing catch form small-scale fishing activities on the outer islands to market. They typically comprise of a small building (with ice machines, cold storage, etc) and adjacent landing facilities (e.g., jetties). Photos of the existing fish bases on Wotje and Jaluit atolls are provided. Other facilities are of a similar scale.

Fish Base at Wotje
(source: MIMRA)

Fish Base at Jaluit
(source: MIMRA)

Markets

Markets at Ebeye (Kwajalein Atoll Fish Market Center) and Majuro (Outer Islands Fish Market Center) have been identified for rehabilitation, repair and upgrade by the Project**.** The primary role of these markets is to provide a facility for the sale of fish collected from the outer islands (i.e., transported from the fish bases and sub-bases) to the public. The markets include retail and wholesale sale of fresh fish, value-added products, and ice. The markets comprise of a building for fish storage and sales, and adjacent landing facilities. The Outer Islands Fish Market Center was built in 2010 with funding from the Japan International Cooperation Agency (JICA). Photos of the markets are provided.

Outer Islands Fish Market Center
(source: MIMRA)

Outer Islands Fish Market Center
(source: https://www.infomarshallislands.com/fish-market/)

Outer Islands Fish Market Center
(source: MIMRA)

The Outer Island Fish Market Center's dock used as haulout area for maintenance
(source: MIMRA)

Kwajalein Atoll Fish Market Center
(source: MIMRA)

View from the second floor of the Kwajalein Atoll Fish Market Center
(source: MIMRA)

Appendix 2*:* Environmental and Social Screening Criteria - Civil Works and Renovation Activities

FORM 1 – Environmental and Social Screening

(To be completed by the CIU E&S Team with inputs from PMU)

Timing: *To be completed prior to finalization of Bid Documents for Project Works; prior to final TOR, prior to final scope of work and budget.*

Purpose:

1) *To scope potential environmental and social risks from proposed works, activities and TA activities (Form 2)*
2) *To Inform E&S Assessment and Management Plan Requirements/Inclusion on Bid Document (Form 3)*

Name of Works:	
Location of Works:	
Date of Form Completion:	
Name of Person Completing Form:	
Date of Site Visit (if applicable):	
Agencies or People consulted to date (to inform completion of form):	
Attached concept description (circle one)	Yes / No

Risk Rating

E&S risks associated with civil works, construction and/or renovation activities will be evaluated according to Form 2 and rated **Low**, **Moderate**, **Substantial** and **High** based on the following four elements[40]:

a) Sensitivity of E&S receptors and scale of works, operations, demand for resources, creation of waste and emissions, sensitivity of vulnerable persons.
b) The nature and magnitude of impacts (duration, intensity, reversibility, complexity) and possibility of mitigation measures.
c) Capacity of the PMU and CIU, RMI legislation and availability of resources to manage E&S risks.
d) Contextual risks – COVID-19, remoteness from markets for expertise, equipment or services.

Risk Ratings will be applied using the activity risk ratings for Forms 2 and 3 as follows. **Substantial** and **High** risk activities / sub-projects will not be supported by the project.

Criteria for Screening Forms 2 and 3	**Sub-Project Risk Rating** (Highest risk rating applies)
Minor or less than minor risk to E&S receptors incl. vulnerable persons (not including SEA/SH risks – see below); minor scale works; (unmitigated)	Low
More than minor risks to sensitive E&S receptors incl. vulnerable persons; minor scale works; but all risks can be suitably mitigated (except as identified below)	Moderate
Large Scale Earthworks (unmitigated)	Substantial

[40] World Bank. 2019. Bank Directive. Environmental and Social Directive for Investment Project Financing.

Criteria for Screening Forms 2 and 3	**Sub-Project Risk Rating** (Highest risk rating applies)
Biodiversity risks – more than minor (e.g., potential impacts to sensitive marine habitat) - (unmitigated)	Substantial (not supported unless discussed with WB and ESS6 review completed);
Cultural heritage risks (unmitigated)	Substantial
Issues with land, assets and / or livelihoods that may lead to social conflict.	Substantial
Large scale impacts on land owners and occupiers and asset owners/users.	High.
Any SEA/SH, GBV, VAC or other risk for vulnerable persons.	High

Form 2 – E&S Risk Screening **Potential Impact**		**Potential Impact (without mitigation) (✓)**				**Describe/Comment on significance**
		Low	**Moderate**	**Substantial**	**High**	
1.0	**Physical Works**					
1.1	Does design of proposed works incorporate design-related E&S risk mitigation wherever possible?					☐ Yes ☐ No If "YES" continue to next rows in this Table. If "NO" Revert to designer to ensure building design has taken into account E&S Risk mitigation.
1.2	Do proposed works/services entail construction activities or physical works?					☐ Yes ☐ No If "YES" continue to next rows in this Table. If "NO" proceed to Social Impact Screening (Part 3 of this Table)
1.3	Dust / noise / vibration impacts on sensitive receptors (e.g. hospital patients, school children, residential communities, businesses, essential services etc).					
1.4	Generation and discharge of solid and liquid waste (e.g. spoil, refuse, domestic waste/ wastewater, hazardous substances etc).					
1.5	Is construction material required for the design (e.g., rock/ aggregate/ cement)					☐ Yes ☐ No

Form 2 – E&S Risk Screening **Potential Impact**		**Potential Impact (without mitigation) (✓)**				**Describe/Comment on significance**
		Low	**Moderate**	**Substantial**	**High**	
	being sourced from external sources (note that sourcing aggregates locally is not permitted)? Materials sourced from coral rock and coastal sand mining is also not permitted.					*Describe:*
2.0	**Ecological**					
2.1	Loss of terrestrial, coastal, or aquatic vegetation and/or habitat (incl. riparian vegetation).					
2.4	Could an alternative design be explored to decrease / avoid ecological impacts or improve ecological outcomes?					☐ Yes ☐ No *Describe:*
3.0	**Social Impacts**					
3.1	Will proposed works be undertaken on land for which appropriate legal occupation rights are held?					☐ Yes ☐ No If "YES" provide copy of documentation. If "NO" do not proceed
3.2	Will proposed works cause physical or economic displacement?					☐ Yes ☐ No If "YES" do not proceed.
3.3	Potential for outcome of activities to lead to SEAH/SH, VAC or GBV impacts.					
3.4	Disproportionate impacts on vulnerable groups, including women, children and people with disabilities, including any potential disruption to services.					

Form 2 – E&S Risk Screening **Potential Impact**		**Potential Impact (without mitigation) (✓)**				**Describe/Comment on significance**
		Low	**Moderate**	**Substantial**	**High**	
3.5	Risks to community health & safety from proposed works (i.e., communities near work site), from waste management.					
3.6	Risks posed to the community from the construction workforce (e.g., imported/migrant labour related risks), including SEA/SH, GBV and VAC.					
3.7	Potential negative impacts on community relations (i.e., conflict) due to Project works or outcomes?					
3.8	Risk to cultural heritage sites or resources.					
4.0	**Resource Efficiency and Pollution Prevention**					
4.1	Do works/activity involve or promote the sustainable use of resources, including energy, water and raw materials.					☐ Yes ☐ No *Describe:*
4.2	Do works/activity avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from Project activities.					☐ Yes ☐ NO *Describe:*
4.3	Do works/activity avoid or minimize Project-related emissions of short and long-lived climate pollutants.					☐ Yes ☐ No *Describe:*

Form 2 – E&S Risk Screening **Potential Impact**		**Potential Impact (without mitigation) (✓)**				**Describe/Comment on significance**
		Low	**Moderate**	**Substantial**	**High**	
4.4	Do works/activity avoid or minimize generation of hazardous and non-hazardous waste.					☐ Yes ☐ No *Describe:*
5.0	**Overall Determination of Risk Status**					
	Notes: *1. Describe overall works/activity risk status and identify any particular risk areas of significance* *2. Identify instruments required* *3. On completion move to Form 3.*					

FORM 3 Agreed Environmental and Social Documents Required

(To be completed by CIU E&S Team, with the support of PMU where appropriate)

Timing: To be completed after completion of Form 2

Purpose:

1) *To confirm which ESMPs are to be prepared and/or implemented for the works*
2) *To confirm which additional management plans are to be prepared by the Contractor.*

Name of Works:	
Location of Works:	
Date of Form Completion:	
Name of Person Completing Form:	
Name of Person Approving:	

For Project activities or works categorized in FORM 2 as Low Risk AND where all risks are assessed as less than minor no explicit E&S documentation will be required.

For Project activities or works categorized in FORM 2 as Low and Moderate Risk, the following safeguard documents are to be prepared/required in Bid Documents for civil works, construction and renovations:

☐ CESMP for Low Risk Works (where risks are assessed as minor or below)

☐ CESMP for Moderate Risk Works

For Project activities or works categorized in FORM 2 as Substantial or High Risk, Project elements to be redesigned and rescreened to reduce the risk back to Low or Moderate.

Signature:

Signed by:
(Completed Form)

Date:

Signature:

Signed by:
(Approver)

Date:

Appendix 3*:* Contractor ESMP Template for Low Risk Civil Works and Renovations

Environment and Social Management Plan

[Name of Sub-Project]

Final/Draft

Revision #

1 INTRODUCTION

Under the PROPER Project MIMRA is undertaking [**type of works]** in the [**Location**].

Works in the [**Location**] are small scale and will take place where possible whilst those areas remain operational, or will be undertaken whilst those areas are non-operational, or a sequence of works will be deployed so as to not interrupt the operation of these areas.

[Insert detailed description of works from TOR or bid documentation]

Works will be undertaken by contractors commissioned by MIMRA under the supervision of the MWIU Project Management Unit or MIMRA.

These internal activities are all considered to have minor environmental, social and health and safety risks and impacts.

This Contractor Environmental and Social Management Plan (CESMP) relates to these works.

The Contractor shall comply with the CESMP.

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

2. SCOPE OF THIS CESMP

This CESMP addresses all environmental, social and health and safety risks associated with the works.

The CESMP is to be attached to and be part of the bid documents for the Project works.

Some of the matters raised in the CESMP are already included in conditions of Bid Documents for the Project. The CESMP provides clear guidance for key areas to be addressed under those Bid Document conditions.

The Bid Documents provide no explicit guidance in regard to consultation/grievance management, and this is covered in this CESMP.

In the event of any environmental and social safeguards conflict between this CESMP and the Bid Documents, this CESMP takes precedence.

3. ENVIRONMENTAL AND SOCIAL MANAGEMENT ROLES AND RESPONSIBILITIES

Names and Roles of Responsible People:

Management of Works

The RMI Ministry of Works, Infrastructure, and Utilities is first preference for the management of the works. If they are unavailable, a Works Supervisor from MIMRA will be nominated for this role.

RMI Ministry of Works, Infrastructure, and Utilities

Melvin Dacillo
Project Management Unit (PMU - Manager)
RMI Ministry of Works, Infrastructure, and Utilities
PO Box 1727, Majuro MH 96960
Email: architectpmurmi2005@gmail.com
Phone: 692-6257407, 625-8911/8931

Or

MIMRA

MIMIRA Works Supervisor

Contact details to be confirmed.

Environmental and Social Impact Oversight

Kimber Rilometo
CIU Safeguards Officer
RMI Ministry of Finance
Phone: (692) 625 5968
Email: ciu.safeguards1@gmail.com

Colleen Peacock-Taylor
CIU Social Safeguards Advisor
RMI Ministry of Finance
Phone: (692) 625 5968
Email: colleen@tautai.com

Garry Venus
CIU Environmental Safeguards Advisor
RMI Ministry of Finance
Phone: (692) 625 5968
Email: gazza700@gmail.com

PROPER Project Coordinator

Rusila Bituwaga
Project Coordinator
PROPER PMU
Phone: (692) 456 7919
Email: rbituwaqa@mimra.com

Contractor

Name: To be confirmed. Responsible for undertaking Project works pursuant to requirements set out in contract documents, including this ESMP.

4. ENVIRONMENTAL, SOCIAL AND HEALTH AND SAFETY REQUIREMENTS

Environmental, social and health and safety risks associated with the Project risks are summarized as follows.

4.1 Worker/public exposure to asbestos during construction and in relation to use of new products

The Secretariat of the Pacific Regional Environment Programme (SPREP) undertook a comprehensive asbestos survey across Majuro in 2014[41]. In this survey, no evidence was reported of any asbestos. None has been reported in Neighboring Islands.

Contractors will nevertheless screen for asbestos in buildings to be refurbished and advise MIMRA, MWIU and RMIEPA if any are found. MWIU/RMIEPA to advise on asbestos handling and disposal protocols. New works shall avoid use of asbestos containing products per MWIU requirements.

4.2 Unlawful land access or land acquisition

All works are to be undertaken within the existing footprint of existing MIMRA leases.

4.3 Occupational Safety and Community Health and Safety

Note that reliance on contractual provisions set out in MWIU Bid Documents including in particular Contractor Sections GC 36.1 and C1.10 both of which relate to development of Health and Safety Plans with oversight by MWIU.

Contractor to set out specific reference to Health and Safety procedures for approval by CIU, including the need to:

1. Implement all reasonable precautions to prevent and reduce accidents and injuries to staff and workers and protect the health and safety of the community (with particular reference to avoiding adverse impacts arising from noise, dust, trip hazards, privacy, access to services without constraint or risk to wellbeing).
2. Take all reasonable steps to ensure communities and the public are kept safe, comfortable and private during construction.
3. Provide and maintain construction plant, equipment and systems of work that are safe and without risks to health. This shall include maintaining equipment, engines, and related electrical installations in good working order; maintaining a clean and tidy work space; providing guards and rails, signals and lighting; providing work site rules, safe working procedures and allocating appropriate places to carry out the work.
4. Provide at the Contractor’s expense, appropriate protective clothing and safety equipment to all staff and labor engaged on the Works to the satisfaction of the Engineer/MWIU Supervisor. The Contractor is to provide records to comply with this condition.
5. Undertake daily hazard identification prior to commencing works; assessing risks and establishing procedures to avoid or reduce risks.
6. Ensure that all the Contractor's personnel, before commencing work, are advised of risks and hazards on site.
7. Deployment of signage to explain there are construction works in place and to stay out/away from the construction zone.
8. Take all reasonable steps to ensure the public and local communities are kept safe during construction (e.g., restricted access to worksite).
9. Where practicable maintain hours of operation to within 07:00 to 19:00, Monday to Saturday.
10. Ensure that no materials containing asbestos are procured for, or installed on, this Project. The Contractor is to provide records to comply with this condition.
11. Implement a procedure to investigate incidents (including near miss incidents) and to identify associated corrective actions.
12. Allow workers to refuse unsafe work environments with no repercussions.

[41] SPREP (2015) “Survey of the Regional Distribution and Status of Asbestos-Contaminated Construction Material and Waste - Best Practice Options for its Management in Pacific Island Countries. Report for the Republic of the Marshall Islands”. May 2015

13. Develop a system of managing complaints and grievances and respond swiftly to complaints to avoid or mitigate health and safety incidents.
14. Ensure all workers sign the Code of Conduct that is provided in the Labor Management Procedures.
15. Ensure workers have access to appropriate toilets and handwashing facilities.

4.4 Waste Management

There will be some packaging waste from new system components and there may be quantities of residual demolition material for disposal.

The key mitigation measure in regard to waste management is requiring the Contractor to prepare and submit an Environmental Management Plan to the Works Project Manager for review within 2 Weeks of the Date of Acceptance of Tender. Such plan shall identify the measures and the sequences of operations to be adopted by the Contractor, in order to satisfy the applicable regulations and constraints.

The Environmental Management Plan is to cover a full range of matters including construction waste disposal, including the need to

1. At all times keep the construction area including storage areas used free from accumulations of waste materials or rubbish.
2. Store, handle and dispose of all waste securely.
3. Dispose of only of small volumes of waste (as determined in agreement with CIU E&S Team) to the Majuro landfill in accordance with landfill operator's requirements and conditions. Contractor to provide evidence of satisfactory waste disposal (e.g. receipts).
4. Before considering disposal, ensure that waste generation is minimized and waste is recycled/reused where possible by the Contractor, private sector or community.
5. Segregate hazardous waste (such as tube lightbulbs) from non-hazardous solid waste and any potentially hazardous wastes should be declared to the waste contractor or landfill operator.

4.5 Consultation and Grievance Management

Specific measure will need to be established for consultation and grievance management including the following matters to mitigate risk of stakeholders being unable to communicate/raise grievances with Project personnel (See Section 4.6 of this CESMP below).

1. Installation of signage at the site entrance and adjacent to the works areas to explain there are construction works in place and advise people to stay out/away from the construction zone.
2. Signs to provide contact details for any third parties who might wish to raise complaints or issues about the works. Contact details (phone, email) will be provided for construction supervisor, MIMRA Contract management and CIU E&S Team.
3. Any comments complaints or issues received shall be escalated in the Project grievance process set out below.

4.6 Grievance Redress Mechanism

Complaints may be raised directly with Contractor's staff who will endeavor to address complaints immediately. If this is not possible the complaint will be escalated to the PROPER Designated Contact Person (DCP).

All direct complaints will be notified to the DCP by Contractor's staff within 6 hours of the complaint being received.

The DCP will immediately determine if the complaint relates to a serious or sensitive matter. If it does, the DCP will immediately refer the matter to the Director of MIMIRA for further investigation and resolution. The DCP will notify the Centralized Implementation Unit (CIU) of the RMI Ministry of Finance and the World Bank.

"Serious or sensitive matters" refer to issues involving potential criminal activity, political interference, conflicts of interest, corruption, land claims, gender-based violence (GBV), sexual exploitation, abuse, or harassment (SEAH) violence against children (VAC) or human trafficking (HT).

In the case of potential criminal activity, it is important that PROPER GM processes do not impede investigation by the appropriate authorities. In situations involving land disputes or claims, the matter will be referred to the Project Steering Committee for immediate attention.

If the concern is related to GBV or SEAH, the Project will first seek to ensure that the victim is safe and has access to required support services. For these reasons, a referral will be made to the WUTMI Weto in Mour: Violence against Women and Girls Support Service.

If the DCP determines it relates to a non-Project matter the DCP shall refer the complainant to a relevant external complaints procedure.

After determining the grievance is project related but is not of a serious of sensitive nature, the DCP will endeavor to resolve the complaint within one (1) day for complaints about day to day works and in any event within two (2) weeks. If resolution cannot be achieved, the DCP will refer the matter to the PROPER Project Coordinator who will take earnest action to resolve complaints at the earliest time possible by liaising directly with representatives of MIMRA as appropriate. The aggrieved party should be consulted and informed of the course of action being taken, and when a result may be expected. Reporting back to the complainant will be undertaken within a period of two weeks from the date that the complaint was received.

If the Project Coordinator is unable to resolve the complaint to the satisfaction of the aggrieved party, the complaint will then be referred to the MIMRA Director for resolution within 1 month of referral.

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

The DCP will be responsible for ensuring that, on receipt of each complaint, the date, time, name and contact details of the complainant (unless anonymous), and the nature of the complaint are recorded in the Complaints/Feedback Register along with the measures to resolve the issue.

Should any complainant remain unsatisfied with the response of the DCP after two weeks,

7. RECORD KEEPING, MONITORING AND REVIEW

7.1 General

The Contractor will complete MWIU's Standard Project Audit Form as set out in Appendix 4 of the ESMP and provide the completed form to MIMRA'S Contract Supervisor for verification on a weekly basis.

7.2 Community Health and Safety Risks

In addition to the Form referred to in Section 7.1, the Contractor will provide MIMRA'S Contract Supervisor with information on a weekly basis relating to any issues with noise, dust, privacy breaches and other risks to the public and community.

7.3 Incident Recording and Reporting

7.3.1 Fatalities and Lost Time Incidents

The Contractor will report lost time harm incidents to the PMU within 24 hrs, and Project-related fatalities immediately. The PMU will report such incidents to the Bank within the same timeframes.

7.3.2 General Reporting

The Contractor will keep the following records (in a site diary or similar) and will forward to the PMU Manager each week:

- Number and type of environmental, social or health or safety incident or significant 'near miss' and follow up / close out of the incident.

- Number and type of complaints received and follow up / close out of the complaint.

PMU Project Coordinator or delegate will verify compliance with this ESMP during each site visit and with each progress meeting. Specific audits will include:

- Verify that any cement board is free from asbestos through an audit of the supply chain.
- Verify that waste is stored correctly, recycling and hazardous materials are separated from solid waste and records are kept of waste going to landfill.
- Verify that the correct safety risks have been identified and controls have been put in place to avoid and minimize harm, as per contract clauses listed above.
- Verify Contractor's records of incidents and complaints.

Where necessary the PMU Project Coordinator or delegate will consult and seek advice from the CIU Safeguards Team.

The PMU Project Coordinator will include the compliance checks in the six-monthly report to the World Bank.

7.4 Review and Monitoring

The Contractor will assist the CIU with reviews of environmental and health and safety management at operational sites, with such reviews addressing compliance with this CESMP. Reviews will be undertaken once within 7 days of works commencing and at one-month intervals thereafter.

Appendix 4*:* Contractor ESMP Template for Moderate Risk Civil Works and Renovations

This template is relevant for civil works and renovation activities associated with a risk rating of Moderate that requires an Environmental and Social Management Plan (ESMP).

The Contract must also comply with relevant requirements of the Project LMP.

Use this template as a guide for preparing a Contractor ESMP (CESMP) that will satisfy World Bank ESF requirements.

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1. INTRODUCTION

2. OVERVIEW

- A brief overview of the Project, environmental and social context and purpose of the ESMP.

3. PROJECT DESCRIPTION

- Site information that is relevant for the design.

4. REGULATORY CONTEXT

- Marshall Islands Legislation - Solid Waste Regs 1989, Earthmoving Regs 1988, 1994, 1998
- World Bank ESF

5. OCCUPATIONAL HEALTH AND SAFETY

5.1 Republic of the Marshall Islands

- In the absence of local legislation, OHS under this Project will be regulated through the World Bank Group's Environmental, Health, and Safety Guidelines.

5.2 World Bank General Environmental, Health, and Safety Guidelines

- The World Bank Group's General Environmental, Health, and Safety Guidelines (EHS Guidelines) (World Bank Group, 2007) represent good international practice for managing occupational health and safety (OHS) risks. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs. The fundamental premise for OHS under the EHS Guidelines is that "Employers and supervisors are obliged to implement all reasonable precautions to protect the health and safety of workers" and that "Companies should hire contractors that have the technical capability to manage the occupational health and safety issues of their employees…".
- The overall OHS philosophy embodied in the EHS Guidelines is as follows:
  - Preventive and protective measures should be introduced according to the following order of priority.
  - Eliminating the hazard by removing the activity from the work process. Examples include substitution with less hazardous chemicals, using different manufacturing processes, etc.
  - Controlling the hazard at its source through use of engineering controls. Examples include local exhaust ventilation, isolation rooms, machine guarding, acoustic insulating, etc.
  - Minimizing the hazard through design of safe work systems and administrative or institutional control measures. Examples include job rotation, training safe work procedures, lock-out and tag-out, workplace monitoring, limiting exposure or work duration, etc.
  - Providing appropriate personal protective equipment (PPE) in conjunction with training, use, and maintenance of the PPE.
- The EHS Guidelines also require that prevention and control measures to minimize occupational

hazards should be based on comprehensive job safety analyses (JSA). The CSU Safeguards Team will assist the contractor in undertaking the JSA and preparing its Safety Management Plan.

6. ENVIRONMENTAL AND SOCIAL MANAGEMENT ROLES AND RESPONSIBILITIES

6.1 Environmental Roles and Responsibilities

6.2 Environmental and Social Training

7. POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS AND RISKS

7.1 Asbestos Containing Material

- The Secretariat of the Pacific Regional Environment Programme (SPREP) undertook a comprehensive asbestos survey across Majuro in 2014[42]. In this survey, 23 non-residential buildings were visited and inspected for asbestos. No evidence was reported of any asbestos fibers present.
- Refer to this study to determine relevance.
- Contractors to nevertheless screen for asbestos in all buildings to be refurbished (Majuro and elsewhere) and advise MWIU and RMIEPA if any are found. MWIU/RMIEPA to advise on asbestos handling and disposal protocols. No new works are to involve use of asbestos-containing materials.

7.2 Land Access

- All works are to be undertaken within the existing footprint of Government land for which a valid lease must be cited. No land acquisition is provided for under the PROPER Project.

7.3 Community and Occupational Health and Safety

7.3.1 Community Health and Safety

- The potential risks to community health and safety are associated with the Project's construction phase and would mainly comprise minor dust and noise impacts and pedestrian/traffic hazards.
- Particular attention to be given to impact and nuisance to sensitive parties.

7.3.2 Occupational Health and Safety

- The extent and duration of works, the likely workforce involved, and the traffic volumes suggest that the OHS hazards from construction activities are relatively low.

7.4 Gender-based violence (GBV), sexual exploitation, abuse, or harassment (SEAH)

- Project all need to make explicit provision for attention to Project-related gender-based violence (GBV), sexual exploitation, abuse, or harassment (SEAH), or violence against children (VAC).

7.5 Waste Management

- Any management of waste will need a specific waste management plan prepared, with minimization and recycling/reuse as well as treatment and disposal. This is for construction or for services where waste will be produced.
- The quantities of waste generated from Project activities are likely to be small. There will be some packaging waste from system components and there may be small quantities of residual excavated material from the building activities (if they are undertaken). While the waste quantities are expected to be limited it is important that all waste is stored, handled and disposed of securely to ensure no leakage into the environment. No hazardous waste is anticipated, with the exception of asbestos waste which is unlikely to be encountered.

[42] SPREP (2015) "Survey of the Regional Distribution and Status of Asbestos-Contaminated Construction Material and Waste - Best Practice Options for its Management in Pacific Island Countries. Report for the Republic of the Marshall Islands". May 2015

7.6 Water Quality Impacts

- Evaluate potential for marine and freshwater quality impacts.

7.7 Vegetation Impacts

- Evaluate potential for vegetation impacts.

8. MITIGATION

The following environmental, social, health and safety measures shall be incorporated in CESMP procedures.

8.2.1 General

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

8.2.2 Potential Asbestos Containing Material

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

8.2.2 Community and Worker Health and Safety

- The Contractor shall at all times implement all reasonable precautions to prevent and reduce accidents and injuries to staff and workers and protect the health and safety of the community.
- The Contractor shall prepare and implement a Worker Health and Safety Plan commensurate with the identified health and safety hazards.
- The Contractor shall at all times provide and maintain construction plant, equipment and systems of work that are safe and without risks to health. This shall include maintaining equipment, engines, and related electrical installations in good working order; maintaining a clean and tidy work space; providing guards and rails, signals and lighting; providing work site rules, safe working procedures and allocating appropriate places to carry out the work.
- The Contractor shall provide, at his/her own expense, the protective clothing and safety equipment to all staff and labor engaged on the Works to the satisfaction of the Engineer. Such clothing and equipment shall include, as a minimum:
    - high visibility vests for workers directing traffic.
    - protective boots and gloves for the workforce undertaking excavation works.
- If the Contractor fails to provide such clothing and equipment, the Employer shall be entitled to provide the same and recover the costs from the Contractor.
- All the Contractor's personnel shall, before commencing work, have an induction course on safety and health at the site. The information and training shall be on the site and have duration of at least two hours.
- The Contractor shall enable workers to refuse unsafe work environments with no repercussions.
- The Contractor shall prepare and implement and Traffic and Pedestrian Management Plan to ensure that any hazards caused by the works are adequately managed.

8.2.4 Waste Management

- The Contractor shall, at all times, keep the construction area, including storage areas used, free from accumulations of waste materials or rubbish.
- All waste shall be stored, handled and disposed in accordance with the requirements of the Solid

Waste Regulations 1989 or as otherwise directed by the Engineer.

- All waste water and sewage from construction facilities shall be managed in accordance with local government regulations, and where and when such regulations require it the Contractor shall obtain a permit or other appropriate documentation approving the storage, treatment and disposal methods being used.

8.2.5 Prevention of Water and Air Pollution

- The Contractor's construction activities shall be performed by methods that will prevent entrance, or accidental spillage, of solid matter, contaminants, debris, and other pollutants and wastes into marine waters and underground water sources. Such pollutants and wastes include, but are not restricted to, refuse, garbage, cement, sanitary waste, and oil and other petroleum products.
- Excavated materials or other construction materials shall not be stockpiled or deposited near or on waterbody perimeters or in a position where stormwater runoff can entrain sediment and cause turbidity in waterbodies.
- Wastewaters from concrete preparation, or other construction operations, shall not enter waterbodies without the use of control methods such as sediment filters.
- During the conduct of construction activities and operation of equipment, the Contractor shall utilize such practicable methods and devices as are reasonably available to control, prevent, and otherwise minimize atmospheric emissions or discharges of air contaminants.
- Equipment and vehicles that show excessive emissions of exhaust gases due to poor engine adjustments, or other inefficient operating conditions, shall not be operated until corrective repairs or adjustments are made.
- During the performance of the construction works the Contractor shall carry out proper and efficient measures wherever and as often as necessary to reduce the dust nuisance, and to prevent dust which has originated from its operations from damaging dwellings, or causing a nuisance to persons.

8.2.6 Preservation of Vegetation

- All trees and other vegetation shall be preserved and shall be protected from damage by the Contractor's construction operations and equipment.
- Movement of labor and equipment for access to the work shall be performed in a manner to prevent damage to vegetation or property.

8.2.7 Construction Facilities

- The Contractor's workshops, office, and yard area shall be located and arranged in a manner to preserve trees and vegetation and minimize impacts to local communities.
- On completion of works, all temporary buildings, including any concrete footings and slabs, and all construction materials and debris shall be removed from the site.

8.2.8 Unlawful land access or land acquisition

- Determine the location of any customary land
- Works to avoid customary land

8.2.9 Project-related gender-based violence (GBV), sexual exploitation, abuse, or harassment (SEAH)

- Contractor to Sign Code of Conduct provided in Labor Management Procedure
- GBV/SEAH awareness training
- GBV/SEAH included in Grievance mechanism

9. GRIEVANCE REDRESS MECHANISM

- Complaints may be raised directly with Contractor's staff who will endeavor to address complaints immediately. If this is not possible the complaint will be escalated to the PROPER Designated Contact Person (DCP).
- All direct complaints will be notified to the DCP by Contractor's staff within 6 hours of the complaint being received.
- The DCP will immediately determine if the complaint relates to a serious or sensitive matter. If it does, the DCP will immediately refer the matter to the Director of MIMIRA for further investigation and resolution. The DCP will notify the Centralized Implementation Unit (CIU) of the RMI Ministry of Finance and the World Bank. "Serious or sensitive matters" refer to issues involving potential criminal activity, political interference, conflicts of interest, corruption, land claims, gender-based violence (GBV), sexual exploitation, abuse, or harassment (SEAH) violence against children (VAC) or human trafficking (HT).
- In the case of potential criminal activity, it is important that PROPER GM processes do not impede investigation by the appropriate authorities. In situations involving land disputes or claims, the matter will be referred to the Project Steering Committee for immediate attention.
- If the concern is related to GBV or SEAH, the Project will first seek to ensure that the victim is safe and has access to required support services. For these reasons, a referral will be made to the WUTMI Weto in Mour: Violence against Women and Girls Support Service.
- If the DCP determines it relates to a non-Project matter the DCP shall refer the complainant to a relevant external complaints procedure.
- After determining the grievance is project related but is not of a serious of sensitive nature, the DCP will endeavor to resolve the complaint within one (1) day for complaints about day to day works and in any event within two (2) weeks. If resolution cannot be achieved, the DCP will refer the matter to the PROPER Project Coordinator who will take earnest action to resolve complaints at the earliest time possible by liaising directly with representatives of MIMRA as appropriate. The aggrieved party should be consulted and informed of the course of action being taken, and when a result may be expected. Reporting back to the complainant will be undertaken within a period of two weeks from the date that the complaint was received.
- If the Project Coordinator is unable to resolve the complaint to the satisfaction of the aggrieved party, the complaint will then be referred to the MIMRA Director for resolution within 1 month of referral.
- Should measures taken by the MIMRA Director fail to satisfy the complainant, the aggrieved party is free to take his/her grievance to the RMI Court, and the Court's decision will be final.
- The DCP will be responsible for ensuring that, on receipt of each complaint, the date, time, name and contact details of the complainant (unless anonymous), and the nature of the complaint are recorded in the Complaints/Feedback Register along with the measures to resolve the issue.

Appendix 5: MWIU Contractor Health and Safety Audit Form

Republic of the Marshall Islands

Compact Infrastructure Program

Contractor Health and Safety Audit

Project Name:	[Project Name]		
Project Code:	[Project Code]		
Audit/Inspection Completed By:		Person(s) Seen:	
Contractor/Area Audited:		Date:	

Key:

OK	Meets requirements	**CAR**	Corrective Action Required
N/A	Not Applicable	**NC**	Not Checked

Item No	Element, Checks and Records		Comments and Rating
1	**Site Specific Health & Safety Plan**	HSE Plan Reviewed	
2		Significant hazards identified with controls in place	
3	**Inductions**	Site inductions of staff completed	
4	**Toolbox Talks**	Regular toolbox talks taking place	
5	**Training**	Competence of Plant Operators adequate	
6		Competence of General Staff adequate	
7	**PPE**	Minimum PPE requirements observed	
8		Additional PPE worn where required	
9	**Access / Egress**	Site signing in/out procedure available and in use	
10		Access routes clearly defined	
11		Access routes clear from obstructions	
12		Housekeeping	

Item No	Element, Checks and Records		Comments and Rating
13		Work area adequately fenced or taped off	
14		Lighting - adequate for operations in place	
15	**Mobile Plant**	Daily maintenance checks being undertaken	
16		Guarding, seat belts, ropes etc. in place and used	
17	**Work at Height**	Are measures in place to prevent falls from height and/or falling materials and are they adequate (e.g. work platforms with suitable edge protection / safety harnesses etc.)	
18		Scaffolding - weekly inspections completed	
19		Rescue procedure available and communicated to those involved	
20	**Excavations**	Adequately supported or battered back and fenced	
21		Access / egress into excavation	
22		Records of daily / weekly inspections	
23	**Tools and Equipment**	Electrical equipment tagged and tested in last 3 months	
24		General condition of tools and equipment e.g., cables, splinters etc.	
25		Lifeguards or similar in use	
26	**Manual Handling**	If staff lifting heavy items, has this been considered in work planning and briefing	
27	**Noise**	If noisy operations in progress, is hearing protection being worn and assessments prepared	
28	**Hazardous Substances**	Storage of materials - safe, prevent loss, damage or contamination	
29		Hazard Data Sheet available for each product and	

Item No	Element, Checks and Records		Comments and Rating
		precautions being complied with	
30	**Environmental Issues**	If the activity is adjacent to water, are silt, concrete, and fuel pollution prevention effective	
31		Dust suppression - if dust is a problem is it being adequately controlled	
32		Drip trays in place for static plant	
33		Availability and location of Emergency Spill kit	
34		Refueling operations controlled	
35	**Waste**	Waste disposal - transfer notes in place (traceability)	
36		Specified waste being recycled	
37		Copy of Tip / Transfer Station license available	
38	**Welfare**	Minimum facilities in place	
39	**Emergency**	Fire Extinguishers available and tested	
40		Procedures visible for all to see	
41		Emergency procedures tested including alarms	

Action/Comment Sheet

Date Issued: [Date]

To be completed by Auditor:			To be completed by Person Responsible for Action:	
Item №	Problem Observed/Comments (Note any specific Document Reference where relevant)	Person Responsible for Action	Corrective Action Taken/ Comments (If applicable)	Action Complete (Initials)

Good Working Practices

Signed:_____

Date:_____

Appendix 6: Chance Finds Procedure – Cultural Heritage and UXO

When a person working on the project discovers a cultural heritage site or item, or any item of unexploded ordinance (UXO) the following procedures should be followed.

1. Stop the activities in the area of the chance find.
2. Delineate the discovered site or area (e.g., fencing).
3. Secure the site to prevent any further disturbance, damage or loss.
4. Notify PMU and MIMRA.
5. Prohibit the collection of objects by any person.
6. For chance find of cultural heritage item:
    a. In cases of human remains, arrange for a guard to watch the site until the police, local government and / or person with delegated authority takes over.
    b. Notify the local government and RMI Historic Preservation Office within 24 hours (and police if it is human remains).
    c. Any objects that are found must be handed over to the Historic Preservation Office.
    d. Project works can resume only after instruction is provided from the Historic Preservation Office.
7. For chance find of UXO:
    a. Notify the local government, National Police Force and MIMRA as soon as possible.
    b. Follow instructions from National Police Force relating to disposal of UXO.
    c. Project works can resume only after instruction is provided from National Police Force and MIMRA.

Appendix 7: COVID-19 Safety Protocol

Introduction

The Government of the Republic of the Marshall Islands (GoRMI) has requested support from the World Bank (WB) for the Republic of the Marshall Islands Pacific Regional Oceanscape Program for Economic Recovery and Resilience (RMI PROPER) Project ('the Project') following successful completion of the WB-funded Republic of the Marshall Islands Pacific Regional Oceanscape Program (RMI PROP) Project.

As part of project financing, the Project is required to comply with the requirements outlined in WB's Environmental and Social Framework and ten Environmental and Social Standards, which include requirements for the management of risks to community health and safety, and occupational health and safety.

The objective of this document is to provide guidance to the Project on managing COVID-related risks to Project workers and the community from the Project.

COVID-19 in RMI

An outbreak of the coronavirus disease (COVID-19) began spreading rapidly across the world since December 2019, following the diagnosis of the initial cases in Wuhan, Hubei Province, China. On March 11, 2020, the World Health Organization (WHO) declared a global pandemic as the coronavirus rapidly spread across the world.

RMI was one of the last countries in the world to experience a major COVID-19 outbreak and remained relatively COVID-10 free until August 2022.

As of 12 May 2022, a total of 67,461 vaccine doses have been administered, with detailed vaccination statistics showing[43]:

- Total vaccine doses administered per 100 population = 114
- Persons fully vaccinated with last dose of primary per 100 population = 67
- Persons Boosted per 100 population = 13

The Government of RMI (GoRMI) mobilized its National Disaster Committee (NDC) to take the lead with preparedness and response to COVID-19. The National Disaster Management Office (NDMO) in the Office of the Chief Secretary activated the National Emergency Operations Center (NEOC) and its technical clusters (water, sanitation and hygiene, health, logistics, infrastructure and other relevant agencies) to provide coordination and implementation advice on COVID-19.

Travel restrictions were implemented to prevent COVID-19 from reaching RMI. The border management protocols for the management of COVID-19 (as at the time of document preparation)[44] include pre-travel staging and testing, and quarantine in the RMI[45]. This includes:

- Requirement for travelers to be vaccinated.
- Pre-departure testing.
- Quarantine on arrival.

The NDMO published COVID-19 management resources on their website[46]. These include:

- Awareness materials (e.g., brochures, posters, etc) in Marshallese, English and Chinese

[43] https://covid19.who.int/table
[44] As at 31 May 2022
[45] Media release, 31 May, RMI Office of the Chief Secretary
[46] https://ndmo.gov.mh/rmi-covid19-information/covid-19-sops/; https://ndmo.gov.mh/rmi-covid19-information/coivd19-approved-awareness-materials/

- Standard Operating Procedures (SOPs) for various government organisations including the Police Department, Telecommunicators Authority, National Training Council, etc.

How COVID is Spread

The WHO provides the following information of the transmission of COVID[47]:

- The virus spreads mainly between people who are in close contact with each other, for example at a conversational distance. The virus can spread from an infected person's mouth or nose in small liquid particles when they cough, sneeze, speak, sing or breathe. Another person can then contract the virus when infectious particles that pass through the air are inhaled at short range (this is often called short-range aerosol or short-range airborne transmission) or if infectious particles come into direct contact with the eyes, nose, or mouth (droplet transmission).
- The virus can also spread in poorly ventilated and/or crowded indoor settings, where people tend to spend longer periods of time. This is because aerosols can remain suspended in the air or travel farther than conversational distance (this is often called long-range aerosol or long-range airborne transmission).
- People may also become infected when touching their eyes, nose or mouth after touching surfaces or objects that have been contaminated by the virus.

Mitigation and Responsibilities

Mitigations measures for addressing the risk of COVID-19 spreading to, and amongst the project workforce and to the community by project workers are provided below.

Activity	Mitigation	Responsibility
All	Stay informed of and implement measures as required by national restrictions or advisories	All
Office-based work	Surfaces and objects to be wiped with disinfectant regularly.	PMU (or delegate)
	Encourage staff to work from home if/when practicable.	PMU (or delegate)
	Staggering workers' start, finish and break time if/when practicable	PMU (or delegate)
	Spread desks apart as far as practicable to keep workers 1.5 m apart.	PMU (or delegate)
	Encourage workers to wear face masks where required and when they cannot maintain physical distancing.	PMU (or delegate)
	Increase airflow and reducing the recirculation of air through opening windows.	PMU (or delegate)
	Provide hand washing facilities and encourage hand washing (e.g., through placement of handwashing signs in the workplace).	PMU (or delegate)
	Place signage and posters about physical distancing and hygiene around the workplace (see resources on NDMO website).	PMU (or delegate)
	Limit face-to-face meetings, and if required have such meetings in an open area if practicable.	PMU (or delegate)
	Reducing the number of situations where workers come into close proximity with others, for example in lunchrooms and other shared spaces.	PMU (or delegate)
	Follow advice of national advisory in event of confirmed case of COVID-19 in office.	Construction contractor

[47] https://www.who.int/news-room/questions-and-answers/item/coronavirus-disease-covid-19-how-is-it-transmitted

Activity	Mitigation	Responsibility
Fieldwork	Do not travel to remote sites if unwell.	Party conducting works (Consultant and/or MIMRA)
	Equipment to be wiped with disinfectant regularly, and between users.	Party conducting works (Consultant and/or MIMRA)
	Limit interaction with community if practicable.	Party conducting works (Consultant and/or MIMRA)
	Encourage workers to wear face masks in vehicles and other situations where social distancing is not feasible.	Party conducting works (Consultant and/or MIMRA)
Stakeholder engagement	Do not travel to remote sites if unwell.	Party conducting engagement
	Encourage workers to wear face masks in vehicles and other situations where social distancing is not feasible.	Party conducting engagement
	Wherever possible, use forms of engagement that do not require face-to-face communication (see Stakeholder Engagement Plan for details).	Party conducting engagement
	Avoid public gatherings (taking into account national restrictions or advisories), including public hearings, workshops, and community meetings.	Party conducting engagement
	If smaller meetings are permitted/advised, conduct consultations in small-group sessions, such as focus group meetings. Such meetings to be held outdoors where practicable.	Party conducting engagement
	Take COVID-19 risk into account when arranging catering for meetings (e.g., provide single serve bottled drinks, individual serves of food as opposed to share platters).	Party conducting engagement
Training	Wherever possible, use forms of training that do not require face-to-face communication.	Party conducting training (typically CIU)
	If smaller meetings are permitted/advised, conduct consultations in small-group sessions, such as focus group meetings. Such meetings to be held outdoors where practicable.	Party conducting training (typically CIU)
	Take COVID-19 risk into account when arranging catering for meetings (e.g., provide single serve bottled drinks, individual serves of food as opposed to share platters).	Party conducting training (typically CIU)
Construction work	Provide hand washing facilities and encourage hand washing.	Construction contractor
	Place signage and posters about physical distancing and hygiene around the workplace (see resources on NDMO website).	Construction contractor
	Follow advice of national advisory in event of confirmed case of COVID on worksite.	Construction contractor

Appendix 8: Incident Response Procedure

Republic of the Marshall Islands

World Bank Projects

Health, Safety, Environmental and Social

Generic Incident Response Procedure

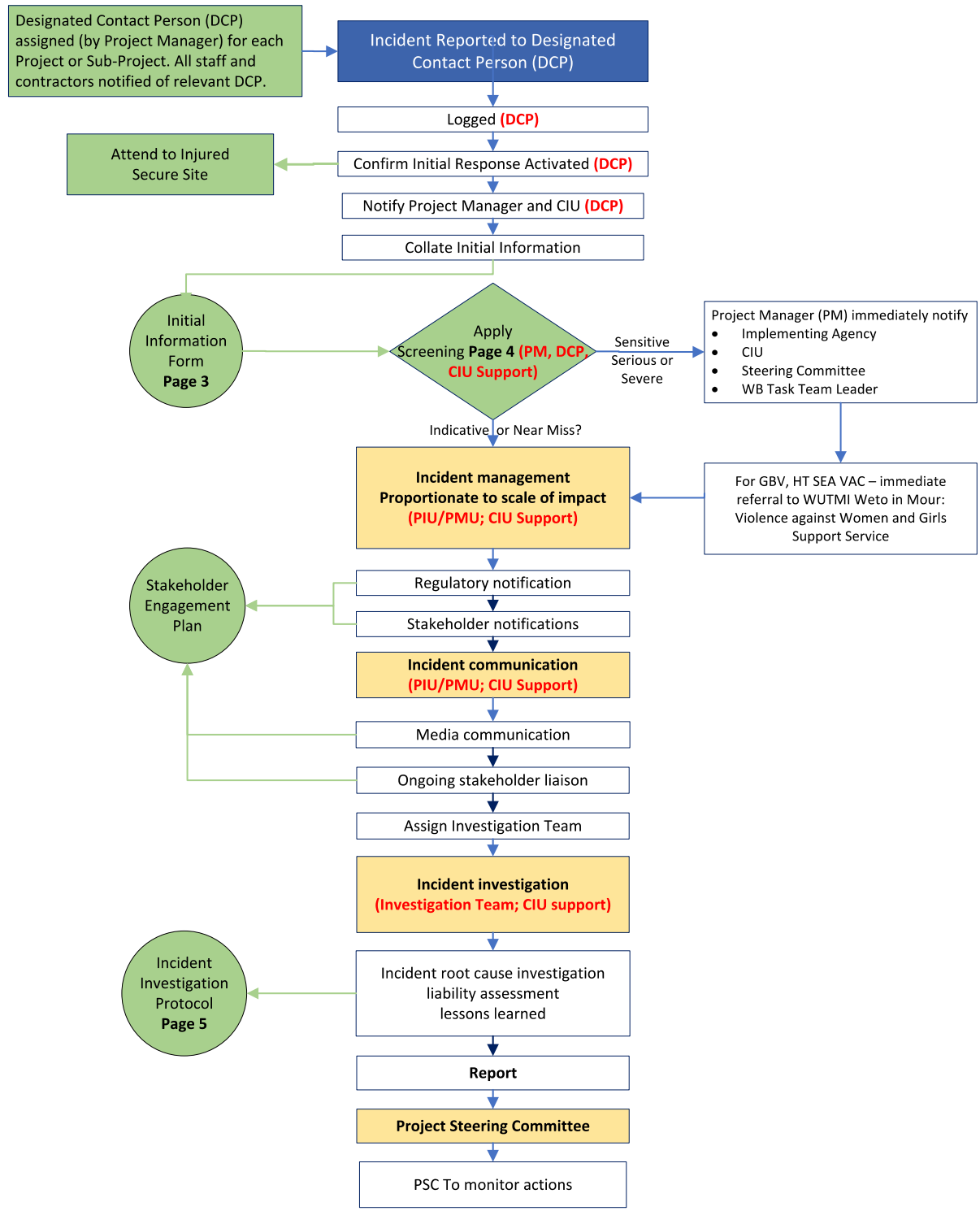
This Health, Safety Environmental and Social Incident Response Procedure (IRP) has been prepared by the Centralized Implementation Unit (CIU) of the Department of International Development Assistance (DIDA) within the Ministry of Finance of the Republic of the Marshall Islands (RMI).

The IRP has been developed following best practice incident response, and refers to the "World Bank Accident Investigation Guide". The IRP applies to all projects within the World Bank RMI portfolio, and is auxiliary to the mandatory Grievance Redress Mechanism prepared for each project.

The IRP will be included in the Project Operations Manual (POM) for each Project and will be managed by respective Project Implementation Units (PIUs) or Project Management Units (PMUs).

Incident Management Procedure V3
27 July 2021

Project Incident Response



Collate Preliminary Information
PIU, PMU, DCP, CIU support

Incident Reference (Name or Number):

Category: *Health and Safety* ☐ *Environmental* ☐ *Social* ☐ *GBV, SEA, HT, VAC* ☐ *Multiple* ☐

What happened? To what, where or to whom? What were the conditions or circumstances under which the incident occurred?

Add pages if necessary

Where and when did the incident occur?

Add pages if necessary

How did you find out about the incident?

Add pages if necessary

Are basic facts clear and uncontested, or are there conflicting versions? *Uncontested* ☐ *Contested* ☐

Is the incident still ongoing or is it contained? *Ongoing* ☐ *Contained* ☐

Does the incident involve:

Loss of life	*Severe harm*	*GBV, HT, SEA or VAC*	*Significant environmental or social impact*
☐	☐	☐	☐

How serious was the incident? Apply Incident Screening Page 4

NEAR MISS	INDICATIVE	SENSITIVE	SERIOUS	SEVERE
☐	☐	☐	☐	☐

Has reporting been made to:

PIU	*CIU*	*RMI EPA*	*World Bank*
☐	☐	☐	☐

What, if any, additional follow up action is required, and what are the associated timelines?

Add pages if necessary

Completed form to be provided to PIU Project Manager and CIU Safeguards as soon as practicably possible.

Incident Screening PIU, DCP, CIU support		
Classification	Health and Safety	Environmental and Social
NEAR MISS	• No personal injury sustained, but where, given a slight shift in time or position, damage or injury easily could have occurred. • **NEAR MISS** incidents with High Potential Risk to be treated as **SERIOUS** for purposes of this incident classification.	• No property was damaged or persons affected, but where, given a slight shift in time or position, environmental damage or social impact easily could have occurred. • **NEAR MISS** incidents with High Potential Risk to be treated as **SERIOUS** for purposes of this incident classification.
INDICATIVE	• Incident that results in a **no more than minor injury** to any individual • Failure to implement agreed H&S measures with limited immediate impacts	• Relatively minor and small-scale localized incident that negatively impacts a small geographical area or small number of people. • Results in **no more than minor harm** • Failure to implement agreed E&S measures with limited immediate impacts
SENSITIVE	• Incident involving GBV, HT SEA VAC	• Incident involving GBV, HT SEA VAC
SERIOUS	• An incident that caused **more than minor injury** to any individual. • Failure to implement H&S measures with significant impacts or repeated non-compliance with H&S policies incidents • Failure to remedy Indicative non-compliance that may potentially cause significant harm. • Is complex and/or costly to reverse • May result in some level of lasting injury • Requires an urgent response • Could pose a significant reputational risk for the Project.	• An incident that caused **more than minor harm** to the environment, communities, or natural or cultural resources • Failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies incidents • Failure to remedy Indicative non-compliance that may potentially cause significant impacts • Is complex and/or costly to reverse • May result in some level of lasting damage or impact on communities or individuals • Requires an urgent response • Could pose a significant reputational risk for the Project.
SEVERE	• Incident involving GBV, HT SEA VAC • Any fatality • Incident that caused or may cause **significant injury** to individuals. • Failure to remedy serious non-compliance that may potentially cause significant harm that cannot be reversed • Failure to remedy Serious non-compliance that may potentially cause severe harm • Is complex and/or costly to reverse • May result in high levels of lasting injury • Requires an urgent and immediate response • Poses a significant reputational risk to the Project.	• Incident involving GBV, HT SEA VAC • Incident that caused or may cause **significant harm** to the environment, communities, or natural or cultural resources • Failure to remedy serious non-compliance that may potentially cause significant impacts that cannot be reversed • Failure to remedy Serious non-compliance that may potentially cause severe impactsIs complex and/or costly to reverse • May result in high levels of lasting damage or injury • Requires an urgent and immediate response • Poses a significant reputational risk to the Project.

INCIDENT INVESTIGATION PROTOCOL

Apply proportionately to scale of impact or potential impact of incident

STEP 1
Develop an investigation plan

- Purpose of the investigation
- Scope of the investigation proportionate to scale of impact
- Investigation team
- Investigation methods to be used
- Information and persons of interest
- Time frame
- Reporting requirements

STEP 2
Prepare timeline of actions leading to primary event

Significant events arranged on time-line - left to right. Sequence organises data for future analysis.

STEP 3
"5 Whys" Analysis for each key sub-event on timeline

1. Ask why an event happened or a condition was present.
2. Continue asking why until the question can no longer be answered.
3. When why can no longer be answered you have reached:
a) A control point (organisational factor)
b) A point that is beyond organisational control
c) A point where more data needs to be collected to answer why

STEP 4
Data Analysis - initial findings to be analysed and transferred to a FishBone Chart.

Classify each piece of factual information from the investigation findings and classify into 'contributory' categories:
• **Absent / Failed Defences** - control measures which did not prevent the incident or limit its consequences.
• **Individual / Team Actions** - errors or violations that led directly to the incident
• **Task / Environmental Conditions** - conditions in existence immediately prior or at the time of the incident that directly influence human and equipment performance in the workplace.
• **Organisational Factor Types** - underlying organisational factors that produce the conditions that affect performance in the workplace. .

STEP 5
Incident analysis - Causal analysis to answer the question "How did it happen?" - Root Cause Analysis and Verification

- Full Root Cause Analysis not usually necessary for near miss or indicative incidents.
- Management System Deficiencies
- Human Performance Problems
- Equipment Performance Problems
- Equipment Failure

STEP 6
Prepare investigation report

- Set out key causes (supported by evidence)
- Recommendations to address causes
- Applicability of the cause to other locations/divisions
- Supporting Data (e.g. drawings, photos, witness statements etc.
- Conclusions are typically reported once the root causes have been identified.

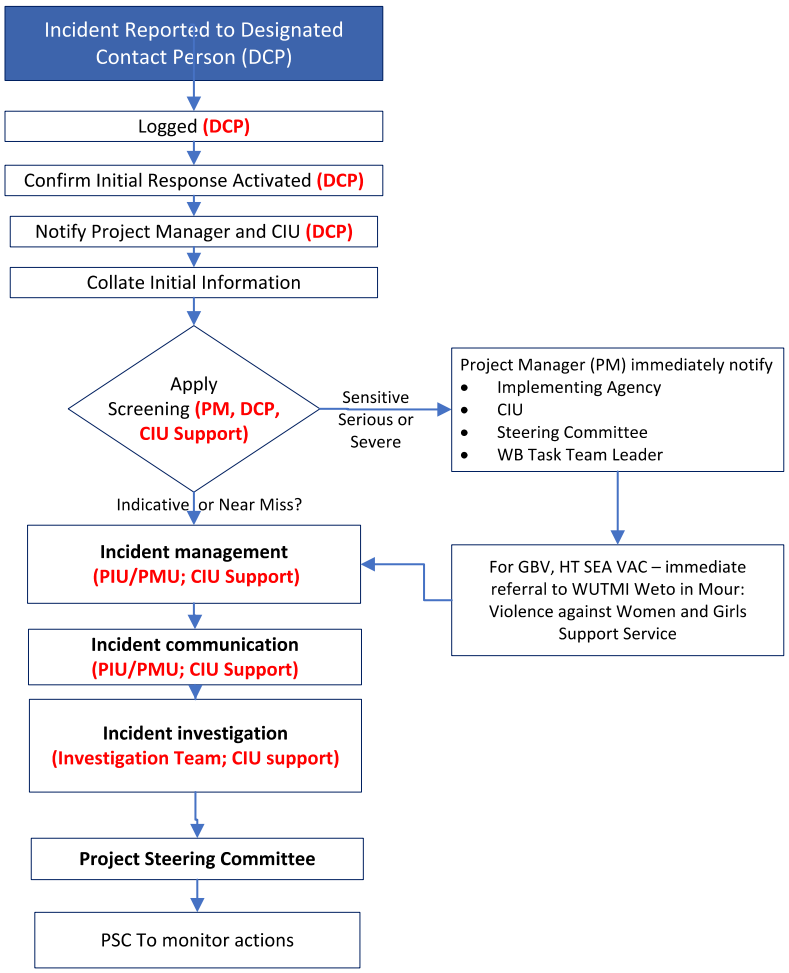
STEP 7
Distribute investigation report

- Determine the audience
- Determine when to report
- Select method(s) of reporting
- Prepare a report and presentation
- Distribution according to organisational procedures for incident reporting and investigation - Distribution List.
- Consider Legal advice regarding 3rd party release of investigation report.

STEP 8
Follow up on report conclusions

For further information see: "World Bank Accident Investigation Guide"

Project Incident Response



Appendix 9: MIMRA Small Boat Safety Standard Operating Procedure

CONTENTS

Appendix 1: MIMRA SMALL BOAT FLOAT PLAN

1. INTRODUCTION

1.1 Purpose

Small boat operations involve certain safety risks that must be addressed prior to use of boats. Knowing what equipment is required to be on the boat and relevant operating rules, understanding the weather and its effects on the marine environment, and even the variations in operating one type of boat compared to another are all obstacles that must be overcome in order to minimize the risks to those on board.

The purpose of this SOP is to establish good boating practices, to ensure that all boating is conducted in a safe and efficient manner, and to familiarize operators with the basic procedures that affect their own safety and the safety of their fellow users.

1.2 Applicability

All MIMRA small boat operators and passengers using World Bank (WB) funded boats and engines are required to observe the provisions of this SOP. MIMRA will use best endeavours to apply this SOP to other small boats in the MIMRA fleet.

For the purposes of this program, a small boat is any boat less than or equal to 27 feet in length and fitted with an outboard engine.

Small boats are strictly for use within lagoons or for immediately adjacent oceanside fishing. Small boats may not be used for inter-island travel.

2. RESPONSIBILITIES

MIMRA Director and Board have overall responsibility for safe operation of MIMRA activities.

MIMRA Deputy Director Coastal and Community Affairs has overall responsibility for this SOP and delegates responsibilities and authorities to those individuals identified. Also has responsibility for reporting 6-monthly to the MIMRA Director and Board on progress with implementation of this SOP, and reporting to the Director immediately in respect of any incident.

Managers of MIMRA Fishing Bases - are responsible for overall implementation of this SOP in relation to boats operating out of each fishing base and for management of safety equipment at fishing bases and on boats.

Boat Operators are responsible for implementation of this SOP in regard to individual boat activities. These responsibilities include, but are not limited to:

1. The safe navigation of the vessel to and from the site(s) of operation.
2. The safe operation of the vessel.
4. Ensuring that all required operational and safety equipment is on board before getting underway and properly stowed upon return.
5. Enforcing safe behavior of all persons on board.
6. Acquainting all passengers with safety equipment, its proper use, potential hazards and an emergency action plan before departure.

Boat Passengers are responsible for following the requirements of the SOP and instructions of the Boat Operator as appropriate.

3. PROCEDURES

3.1 Introduction

This section sets out a series of PROCEDURES developed as a comprehensive safety checklist in respect of small boat use by MIMRA personnel. Figures 1 and 2 set out the operational and maintenance procedures respectively.

3.2 Planning and Administration

Managers of MIMRA Fishing Bases shall:

1. Be responsible for safe storage of all safety equipment.
2. Ensure that safety equipment is available and situated on boats prior to boat departure.
3. Ensure that Boat Operators meet the minimum age and SOP/Manual awareness requirements set out below, and have completed an approved safe boating course.
4. Maintain a log for each boat setting out details from Float Plan and any records of damage from "After Return" reports.
5. Ensure each boat is maintained in a safe condition and that engine maintenance has been undertaken in accordance with Section 3.4 of this SOP.
6. Ensure each boat has adequate fuel and has been inspected prior to handing over to boat operators.
7. Always check weather forecast before boat is released for departure.
8. Only clear boat for departure if satisfied that all safety measures set out in this SOP have been complied with.

Boat Operators shall:

1. Be at least eighteen 18 years of age.
2. Be familiar with the MIMRA Small Boat Safety Manual and Small Boat Safety SOP.
3. Complete a MIMRA approved safe boating and first aid course.

3.3 Small Boat Operation

Boat Operators shall:

1. Always have a crew of at least 2 (including the operator) on board the boat.
2. Ensure no children under the age of 15 are passengers on the boat unless there is an emergency.
3. Ensure no passengers travel on board under the influence of alcohol and/or drugs that impair function.
4. Brief crew and passengers before departure on the location and proper use of all safety and communication equipment.
5. Be responsible for safe vessel operation and compliance with all safety requirements.
6. Continue to monitor weather conditions throughout the trip.
7. Be familiar with operation of all safety equipment on the boat.
8. Ensure that all non-swimming passengers wear personal flotation devices (PFD) at all times.
9. Follow "pre-departure" responsibilities:

a) Fill out Float plan and submit to the Manager of MIMRA Fishing Base.
b) Double check fuel - operator to ensure vessel has enough fuel to provide a reasonable margin of safety for return trip.
c) Complete a Radio Check prior to departure.

10. Follow "after returning" responsibilities:
    a) Rinse engine.
    b) Scrub boat with deck brush.
    c) Log fuel use in logbook.
    d) Note any damage or boat/motor problems in logbook.
    e) Update log book for each boat upon completion of each trip:
        i. Float plan completion and reference
        ii. Crew names
        iii. Names of passengers
        iv. Confirm no passengers or crew younger than 15
        v. Departure date, time, destination, arrival time and return to base time
        vi. Area fished; fishing method; date of fishing, species (and numbers caught).

Boat Passengers shall

1. Follow instructions of boat operator.
2. Advise boat operator if unable to swim.
3. If unable to swim wear a flotation device at all times.
4. Report any hazards to the boat operator.
5. Not travel on board under the influence of alcohol and/or drugs that impair function.

3.4 Maintenance of Boats and Motors

Managers of MIMRA Fishing Bases shall ensure that the following maintenance regime is applied to outboard motors:

1. **Before every departure** check that the following items are in an acceptable status/quantity and fit for purpose for the intended journey: fuel, water, oil, tools, plugs, fuel filter, impellor, hull integrity, safety gear.
2. **Monthly inspection and service** (based on 100 engine hours) – inspect fuel system for leaks, cracks or malfunction; clean engine fuel filter; flush cooling system with fresh water; gear-box oil should be changed every 100 hours of operation or six monthly, whatever comes first; inspect and replace spark plugs as required; check hull for cracks/leaks and fix as necessary.
3. **Three-monthly inspection and service** (based on 300 engine hours) – as above plus: marine grease should be injected through the specified points (grease nipples) on the outboard motor; water pumps inspected and the pump impeller changed every 300 hours of operation or once a year, whatever comes first; propeller pulled off and the propeller shaft greased; zinc anode pulled off and scrubbed.
4. **Six-monthly inspection and service** (based on 600 engine hours) – As above plus: clean portable fuel tank and its filter.

4. SAFETY EQUIPMENT

Boats shall contain at least one (1) of each of the following items of safety equipment:

1. Life jacket or personal flotation device for each person on board.
2. Throwable flotation device - can be thrown to individual in the water in case of trouble.
3. Visual distress signalling device – for day and night use. [Streamer, mirror, laser, strobe flashlight, light, spare batteries etc. to be accessible and stored in a dry location. Crew and passengers to be made aware of their location and safety rules for proper usage.]
4. Medical kit for cuts, scrapes, seasickness or small emergencies; emergency blankets.
5. Anchor with line to hold your boat in place while you wait for help to arrive
6. Bailing device or bucket to dewater and stay afloat
7. Personal Locator Beacon
8. Hand held GPS and/or maritime charts of the area
9. Compass
10. Sea anchor
11. Oars or paddles in case the engine quits
12. VHF radio in a waterproof dry bag to call for help
13. Knife to cut a line around a fouled propeller
14. Sound Producing Devices – horn capable of producing 4 second blast audible for at least ½ mile; attach a whistle to each life jacket
15. Tools and Spares
16. Basic toolbox with tools appropriate for the boat.

5. SMALL BOAT FLOAT PLAN

All Boat Operators of boats must leave a float plan with a responsible party on shore (Appendix I).

6. TRAINING

All MIMRA Fish Base Managers and potential small boat operators will undertake training in small boat safety and maintenance through a MIMRA approved course prior to small boats and outboard motors being deployed.

7. EMERGENCY RESPONSE

In the event of an emergency relating to MIMRA small boat operations

<u>Managers of MIMRA Fishing Bases</u> shall:

1. Log details of the emergency in the boat log.
2. Instruct boat operator to identify location, deploy safety equipment including life jackets and floatation aids and remain in contact.
3. Contact local community (police, local government, red cross etc.) to send assistance.
4. If safe take out another MIMRA boat to assist with response

<u>Boat Operators</u> shall:

4. Ensure crew and passengers are safe.

5. Provide first aid as required.
6. Communicate with MIMRA Fish Base or other party – but make sure "other party" advises MIMRA Fish Base
7. Ensure crew and passengers remain with boat subject to personal safety.
8. Use emergency signaling equipment in Grab Bag as necessary.

8. STAKEHOLDER ENGAGEMENT

The **MIMRA Deputy Director Coastal and Community Affairs** will be responsible for distribution of the SOP to all relevant stakeholders – including MIMRA board, management and Majuro-based staff; MIMRA Fish Base Managers; and for arranging awareness training on an as-required basis.

MIMRA Fish Base Managers will be responsible for distributing this SOP to all potential boat operators and ensuring that potential boat operators are aware of the contents of the SOP as they relate to themselves.

9. RECORD KEEPING AND ACCIDENT REPORTING

9.1 Routine Records

The MIMRA Fish Base Manager shall keep a file of usage for all MIMRA small boats, including a log of scheduled and unscheduled maintenance for boat and outboard engines.

9.2 Accident Reporting

Any accident and or incidents no matter how minor are required to be reported to the MIMRA Fish Base Manager and/or MIMRA Deputy Director Coastal and Community Affairs within 12 hours of occurrence. The Boat Operator will be required to give a full written accounting of the accident/incident.

Any accident resulting in a fatality must be reported to the Manager and/or Division Director immediately after emergency personnel have been contacted or emergency response has been provided.

9.3 Definitions:

Incidents are defined as events that result in minor injuries (cuts and scrapes) or "cosmetic" damage to vessels (dents and scratches that don't affect the operation of the vehicle or vessel.)

Incidents also include near misses, such as when a situation occurred that could have led to an accident, which should be reported as well.

Accidents are defined as events in which a serious injury requiring medical attention beyond basic first aid or death occurred. An accident is also defined as a situation where major property damage occurred.

10. INDEMNITY

MIMRA will not be liable for any matter associated with unauthorized use of small boats.

11. VARIATIONS

This SOP may be varied under the Authorisation of the MIMRA Deputy Director Coastal and Community Affairs.

FIGURE 1: SMALL BOAT OPERATION

MIMRA FISH BASE MANAGER

- Safe storage of all safety equipment.
- Ensure safety equipment on boats prior to departure.
- Ensure Operators meet minimum age SOP awareness and training requirements.
- Ensure each boat maintained in safe condition and engine maintenance in accordance with SOP [refer Figure 2].
- Ensure each boat has adequate fuel and has been inspected prior to handing over to boat operators.
- Check weather forecast before boat is released for departure.
- Only clear boat for departure if satisfied that all safety measures set out in this SOP have been complied with.
- Maintain a log for each boat itemising compliance with details above.

BOAT OPERATOR

- Be at least eighteen 18 years of age.
- Be familiar with the MIMRA Small Boat Safety Manual and Small Boat Safety SOP
- Complete a MIMRA approved safe boating and first aid course.

Verification by FB Manager

Manager Approves Boat Operator

PASSENGERS

- Follow instructions of boat operator.
- Advise boat operator if unable to swim
- If unable to swim wear a flotation device at all times
- Report any hazards to the boat operator

- Ensure crew of at least 2 (incl. operator).
- No children under 15 passengers on boat.
- Brief crew and passengers before departure
- Responsible for safe vessel operation.
- Familiar with all safety equipment on boat.
- Ensure all non-swimming passengers wear personal flotation devices (PFD).
- Fill out Float plan and submit to FB Manager
- Double check fuel - verify enough fuel to provide a reasonable margin of safety for return trip.
- Complete Radio Check prior to departure
- Follow “after returning” responsibilities:
  - Complete log book for each trip
  - Rinse engine
  - Scrub boat with deck brush.
  - Log fuel use in logbook.
  - Note any damage or boat/motor problems in logbook

FIGURE 2: SMALL BOAT MAINTENANCE

MIMRA FISH BASE MANAGER

Appendix 1: MIMRA SMALL BOAT FLOAT PLAN

Fill out this form as completely as possible and leave it with the MIMRA Fish Base Manager on shore prior to departure. In the event your return is delayed, and communications are lost, the MIMRA Fish Base Manager should activate a response based on details in this form.

TRIP DETAILS

Vessel Operator Name and mobile phone number:	
Vessel ID Number or name:	
Date of trip	
Time of Departure	
Travelling to:	
Estimated Time and Date of Return	

OTHER PEOPLE ON BOARD

Name and phone number	Gender	Age	Emergency Contact Details