

# Semi-Annual Safeguards Monitoring Report – July- December 2016

## Cyclone Pam Road Reconstruction Project

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## Acronyms and abbreviations

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ADB	Asian Development Bank
CEMP	Construction environmental management plan
CLMO	Customary Land Management Office
CPP	Consultation and Participation Plan (for the project)
CSS	Country safeguard system
DDR	Due Diligence Report
DEPC	Department of Environment Protection and Conservation
DGMW	Department of Geology, Mines and Water (within Ministry of Land and Natural Resources)
DFAT	Department of Foreign Affairs and Trade (Australian Government)
DSC	Design and supervision consultant
EARF	Environmental Assessment and Review Framework
EIA	Environmental impact assessment
EPCA	Environment Protection and Conservation Act 2010 (as amended)
GDP	Gross domestic product
GRM	Grievance Redress Mechanism
IEE	Initial environmental examination
IWG	Infrastructure Working Group
MCC	Ministry of Climate Change, Meteorology and Geo-hazards, Environment, Energy, and Disaster Management
MIPU	Ministry of Infrastructure and Public Utilities
MOU	Memorandum of Understanding
PAM	Project Administration Manual
PDNA	Post Disaster Needs Assessment (prepared by government and development partners)
PEA	Preliminary environmental assessment
PMU	Project Management Unit (within MIPU for the project)
PWD	Public Works Department (within MIPU)
RF	Resettlement framework
SPS	Safeguards Policy Statement 2009 (of ADB)

## Executive summary

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The Cyclone Pam Road Reconstruction Project (the Project) commenced on 6 July 2016. The purpose of the Project is to restore the Efate ring road to pre-Cyclone Pam conditions.

During the period from July to December 2016, the Project completed the feasibility and design phases. This included information gathering, consultations, options assessment, social, environmental and climate change screening and assessments, economics analysis and engineering design.

This semi-annual safeguards monitoring report was prepared in January 2017, to document the monitoring activities of the previous six months. The report outlines the policy and legislative framework for the Project, the safeguards monitoring activities undertaken, the outcomes of the monitoring, including non-conformances and how these have been addressed, and any conclusions and recommendations for the future.

No non-conformances have been identified to date.

The key safeguards issue is the delay in the review and approval of the Project's environmental permit. Conflicting advice and the limited capacity of DEPC led to an application for environmental permit submission which needed re-formatting and then needed to be resubmitted. This process took one month to be resolved. The risk of this delay is that further environmental assessments will be requested and that consent conditions will now not be included in the original tender documents. These may need to be imposed later and this may lead to cost risk implications.

Actions being taken to manage this are proactive follow up and communication between PWD and DEPC to ensure the permit is reviewed and issued during the tender period, so that any requirements can be issued to tenderers as an addendum.

All of the project Memoranda of Understanding (MOUs) were agreed and signed with landowners during the period.

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# 1 Introduction

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Severe Tropical Cyclone Pam (TC Pam) was a category 5 cyclone that moved through Vanuatu on 13 March 2015. Passing just east of the island of Efate, the ensuing impact resulted in severe damage to infrastructure including roads, bridges, housing, telecommunications, and sewerage and water supply systems. 17,000 buildings were destroyed or damaged, livelihoods dependent on agriculture were compromised<sup>[1]</sup> and 11 fatalities were suffered.<sup>[2]</sup>

Large waterway flows and debris build-up caused damage to bridges, including to piers, abutments and scour protection. Road approaches to bridges, causeways and culverts collapsed or were washed away and road pavement stability was affected in a number of locations. The major damage to the transport sector was to the Efate Ring Road. This road is a 120 km sealed two-way road, providing transport services to the rural population (about 29,150 people) around the Efate Island and connects to the capital (Port Vila, with an urban population of 55,525); it is the only road link servicing the rural population of Efate.

This disaster caused the Vanuatu's gross domestic product (GDP) growth to contract to 0.9 per cent in 2015, down from 2.3 per cent in 2014<sup>[3]</sup>. TC Pam had a notable effect on tourism, with immediate and future bookings affected for up to 12 months.

On 25 August 2015, the Government of the Republic of Vanuatu (the government) requested the assistance of the Asian Development Bank (ADB) to assess the damage to roads and their structures on the island of Efate. ADB provided this assistance by scoping the Cyclone Pam Road Reconstruction Project (the Project), confirming loan and grant funding availability and procuring a design and supervision consultant (DSC).

Nineteen (19) sites were initially identified in the scope of work. During the inception phase of the Project, this was expanded to 20, including eight bridges, nine culverts, two road sections and one landslide.<sup>[4]</sup>

## 1.1 Scope of report

This semi-annual safeguards monitoring report was prepared to meet the requirements of government and ADB. The report covers the period from 6 July 2016 to 31 December 2016.

The report outlines the policy and legislative framework for the Project, the safeguards monitoring activities undertaken, the outcomes of the monitoring, including non-conformances and how these have been addressed, and any conclusions and recommendations for the future.

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<sup>[1]</sup> Widespread crop destruction occurred to 80% of Vanuatu's rural communities (Government of Vanuatu, 2015)

<sup>[2]</sup> Government of Vanuatu. 2015. *Post Disaster Needs Assessment Report*. Port Vila.

<sup>[3]</sup> <http://data.worldbank.org/indicator/NY.GDP.MKTP.KD.ZG?locations=VU>, accessed 03/08/2016

<sup>[4]</sup> Bridges: Prima, Mele, Tanoliu, Marona, Epule, Lamin, Pangpang, Rentapau; Roads: Onesua, Teuma-Rentapau; Culverts: Creek Ai, Havannah, Malatia, Sara, Epau, Neslep, La Cressonniere, Eton Beach, Eton Dry Creek; Geotechnical: Klems Hill. Inception Mission MOU, Para.12 (i)

## 2 Policy and legal framework

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### 2.1 Government of Vanuatu

Monitoring activities form part of the implementation of the environmental impact assessment and management system in Vanuatu, which is provided for under the Environmental Management and Conservation Act No. 12 as amended by The Environmental Protection and Conservation (Amendment) Act No. 28.

The Environmental Protection and Conservation Act 2002 (EPC Act) is the umbrella environmental legislation in Vanuatu and effects the Environmental Impact Assessment (EIA) Regulations.

The EPC Act is administered by the department of Environmental Protection and Conservation (DEPC) and focuses on four main areas:

- > Administration
- > Environmental impact assessments
- > Biodiversity
- > Bio-prospecting laws and community conservation areas (CCAs)

The Amendment Act makes a number of important changes directly relevant to climate change:

- > Includes a definition of climate change
- > Adds the concept of ecosystem services and processes to the Act
- > Applies the precautionary principle to any decision made regarding the environment that may risk human health or threaten damage to the environment
- > Specifies that any decision made under the terms of the Act must be guided by consideration of climate change adaptation and mitigation issues

The Act states that all projects, proposals or development activities that: (a) cause or are likely to cause significant environmental, social and/or custom impacts; or (b) cause impacts relating to the matters listed in subsection (2); are subject to an EIA. The EIA Regulations establish the procedures for undertaking the environmental assessment of any development or activities that are likely to cause significant environmental, social, and/or custom impacts, under the provisions of the EPC Act.

The Project operates under this legislation and is also subject to the requirements of the ADB's Safeguard Policy Statement, 2009.

#### 2.1.1 Other relevant legislation

There is other legislation to which the Project must comply. The legislation, the administering body, relevant permits and monitoring requirements under each are tabled below.

**Table 2-1 Legislation, permits and monitoring**

<b>Legislation</b>	<b>Relevant Approving Authority</b>	<b>Detail</b>	<b>Approval and Permit</b>	<b>Monitoring required</b>
Environmental Management and Conservation Act	Department of Environmental Protection and Conservation (DEPC)	The entire development requires approval under this Act. As determined by the Director authorised under the Act	A Preliminary Environmental Assessment (PEA) is required by DEPC, to obtain the Director's determination	Observance of conditions of obtained permit
Foreshore Development Act	Physical Planning Unit c/o Department of Provincial Affairs	An application for consent is required for works below the mean high water mark, on and/or over the seabed	Application is required, including consent from landowners (Memorandum of Understanding (MOU)) and other government agencies	Observance of conditions of obtained permit
Physical Planning Act	Shefa Provincial Council	The project sites are located within the Shefa Provincial Council. Some parts of Efate have been designated "physical planning area" and therefore development approval from the Council is needed	PWD confirmed this does not apply to this Project (8 Nov 2016)	N/A
Water Resources Management Act	Department of Geology, Mines, and Water Resources	An application is required for the construction, operation and maintenance of works relating to the protection, management and use of water including stormwater and wastewater	The Contractor is to obtain water extraction and working in waterways permit	Observance of conditions of obtained permit
Quarry Act	Department of Geology, Mines, and Water Resources	An application is required for a quarry permit for construction materials (road base, aggregates), including quarry management plan	The Contractor is to obtain quarry permit if operating their own quarry	Observance of conditions of obtained permit, if required
Customary Land Management Act	Customary Land Management Office	Consent for use of land for construction camp sites, storage of machinery and Project work sites	General agreement provided during consultations with the Council of chiefs but will require individual custom land owner to agree through a MOU	Observance of signed MOUs
Building Permit	Public Works Department (PWD)	Building consent application	PWD confirmed this does not apply to this Project (8 Nov 2016)	Nil
Airspace permit	Airports Vanuatu	For all work that requires crane or piling within the controlled airspace radius, a permit may be required.	Contractor is required to consult Airports Vanuatu to obtain clearance or permit, as required	Observance of conditions of obtained permit, if required

<b>Legislation</b>	<b>Relevant Approving Authority</b>	<b>Detail</b>	<b>Approval and Permit</b>	<b>Monitoring required</b>
		This affects Prima, Mele and Klems Hill subproject sites		

## **2.2 ADB Safeguard Policy Statement**

Safeguard policies are generally understood to be operational policies that seek to avoid, minimise, or mitigate adverse environmental and social impacts, including protecting the rights of those likely to be affected or marginalised by the development process. ADB's safeguard policy framework – Safeguard Policy Statement, 2009 (SPS) – consists of three policies: the environment, indigenous peoples, and involuntary resettlement.

The objectives of ADB's safeguards are to:

- (i) avoid adverse impacts of projects on the environment and affected people, where possible;
- (ii) minimize, mitigate, and/or compensate for adverse project impacts on the environment and affected people when avoidance is not possible; and
- (iii) help borrowers/clients to strengthen their safeguard systems and develop the capacity to manage environmental and social risks.

### **2.2.1 Environmental safeguards**

ADB's environmental safeguards aim to ensure the environmental soundness and sustainability of projects, and to support the integration of environmental considerations into the Project decision-making process. For this Project, the policy required screening which lead to a Category B impact assessment, which requires the preparation of an Initial Environmental Examination (feasibility and design phase). Institutional arrangements, an environmental management plan (EMP) and monitoring and reporting mechanisms must be included in the IEE and planned for implementation during the pre-construction, construction and post-construction phases.

### **2.2.2 Social safeguards**

The SPS requires ADB-assisted projects to:

- > Avoid involuntary resettlement wherever possible
- > Minimise involuntary resettlement by exploring project and design alternatives
- > Enhance, or at least restore, the livelihoods of all affected persons in real terms relative to pre-project levels
- > Improve the standards of living of the affected poor and other vulnerable

It covers both physical displacement (relocation, loss of residential land, or loss of shelter) and economic displacement (loss of land, assets, access to assets, income sources, or means of livelihoods) as a result of land acquisition or restriction on land use or on access to parks and protected area.

## **2.3 Project-specific documents**

### **2.3.1 Project Administration Manual**

The Project Administration Manual (PAM) notes the following planning and implementation requirements:

- > Grievance redress mechanism (GRM), including both men and women – Para. 10, 104 (iv), 130, 143
- > Resettlement and community consultation meetings will involve women and be conducted by male and female facilitators – Para. 50
- > Community Consultation Plan – Para's. 59 (iv), 61 (iii), 104 (i), 107 (i), 137, also noted in the Financing Agreement (Loans), Schedule 6, Para. 17
- > Monitoring of the construction environmental management plan (CEMP) – Para. 61 (iii)
- > Six-monthly Safeguards monitoring reports submitted to ADB – Para. 61 (vi)
- > Template for environmental monitoring reporting – Para. 97 (iii)
- > Implement system for monitoring social safeguards compliance – Para. 104 (xiii)

### **2.3.2 Environmental Assessment and Review Framework**

An Environmental Assessment and Review Framework (EARF) was prepared for the Project in 2015. The framework sets out the processes to be followed for the Project as a whole and for individual subprojects as and when they are identified. The framework covers the types of subprojects to be implemented (in terms of identifying generic impacts and mitigations) and clearly identifies the process to be followed (from screening through to monitoring) and the implementation arrangements (procedures, roles, responsibilities, and budget).

The EARF identifies this Project as category B for environmental impact, as it has been assessed that its potential adverse environmental impacts are less adverse than those of category A projects, impacts are site-specific, few if any of them are irreversible, and in most cases mitigation measures can be designed readily. This was confirmed by the assessments during feasibility phase and reported in the Initial Environmental Assessments (IEEs).

The monitoring is as required by the environmental management plans. The environmental management plans are drafted in the IEEs, which will be used as the basis of the CEMP. The CEMP will address development consent conditions and detailed working statements and methodologies.<sup>1</sup> The CEMP is to set out a monitoring and reporting program and describe monitoring measures with technical details, including:

- > Parameters to be measured
- > Methods to be used
- > Sampling locations
- > Frequency of measurements
- > Detection limits
- > Definition of thresholds that will signal the need for corrective actions
- > Reporting and disclosure procedures<sup>2</sup>

The reporting requirements under the EARF are the semi-annual safeguards monitoring reports (by DSC), quarterly progress reports (by DSC), monthly progress reports (by Contractor) and the Project Completion Report (by MIPU).<sup>3</sup>

A GRM and consultation process is required under the EARF.<sup>4</sup> The requirements for this are co-ordinated with the requirements of the Resettlement Framework and PAM for GRM disclosure, operation and management.

### **2.3.3 Resettlement Framework**

A Resettlement Framework (RF) was prepared for the Project in 2015. The Project objective, as stated in the RF, is:

“to avoid land acquisition and resettlement impacts to a maximum possible extent; to minimize resettlement impacts by exploring project and design alternatives; to enhance, or at least restore, the livelihoods of all displaced persons (DPs)<sup>5</sup> relative to pre-project levels; and to improve the standards of living of the poor DPs and other vulnerable groups”<sup>5</sup>

The RF focusses on the criteria, impact assessment and process to be followed to evaluate, consult, document and ultimately avoid, resettlement. Monitoring is only required under the RF if a resettlement plan is required under the Project. At this stage, no resettlement impacts are identified and a social safeguards due diligence report has been prepared.

<sup>1</sup> ADB, 2015, Environmental Review and Assessment Framework, Para.119, p22

<sup>2</sup> ADB, 2015, Environmental Review and Assessment Framework, Para.97, p17

<sup>3</sup> *ibid*, Para.123-125, p23

<sup>4</sup> *ibid*, Para.104, p18

<sup>5</sup> ADB, 2015, Resettlement Framework, Para,20, p5

## 2.4 Institutional arrangements

Using the arrangements outlined in the EARF, the implementation arrangements for environmental and social safeguards are updated in the table.

**Table 2-2 Implementation arrangements**

Project implementation organisations	Management Roles and Responsibilities
Ministry of Finance and Economic Management	<ul style="list-style-type: none"> <li>▪ Executing agency and ministry representing the recipient</li> </ul>
Ministry of Infrastructure and Public Utilities (through Public Works Department)	<ul style="list-style-type: none"> <li>▪ Implementing agency</li> <li>▪ Responsible for overall implementation of the Project through PWD and DSC</li> <li>▪ Establish Infrastructure Working Group (IWG) within MIPU to review and approve Project documents and direction</li> <li>▪ Responsible for submitting withdrawal applications, reporting requirements, including submitting the annual audit report and audited financial statements and record keeping</li> <li>▪ Responsible for providing counterpart in-kind contribution (e.g., land, office space, taxes and duties, counterpart staff) for project components</li> <li>▪ Review of safeguards documents and key liaison for the interaction of government departments</li> </ul>
DEPC	<ul style="list-style-type: none"> <li>▪ Coordinate and liaise with MIPU and the DSC and confirming the process and safeguards instruments to be prepared for the project</li> <li>▪ Provide advice, information and assistance on the environmental details and existing management plans or legislation covering aspects of the subproject areas</li> <li>▪ Review the environmental permit application in line with statutory requirements and determine whether further information and/or assessment is required</li> <li>▪ Upon acceptance of the applications and assessments, issue environmental permit with or without conditions</li> <li>▪ Undertake periodic monitoring of the subprojects and implementation of environmental permit conditions as required</li> <li>▪ Undertake to review the environmental grievances or complaints that cannot be resolved through the GRM</li> </ul>
ADB	<ul style="list-style-type: none"> <li>▪ Financier through Asian Development Fund grant and loan and Global Environment Fund</li> <li>▪ Full administrator of the Project</li> <li>▪ Technical and compliance review of safeguards documents</li> </ul>
DSC	<ul style="list-style-type: none"> <li>▪ Employ a national safeguards specialist, international environmental safeguards specialist, national social and gender safeguards specialist and international social safeguards specialist</li> <li>▪ Ensure that the environmental safeguards are implemented as set out in this EARF so as to meet intended requirements</li> <li>▪ Undertake safeguards assessments during the feasibility study</li> <li>▪ Ensure that the EMPs from approved environmental assessments are included as part of construction bid and contract documents</li> <li>▪ Undertake monitoring</li> <li>▪ Supervise the implementation of the EMP during construction</li> <li>▪ Brief the DSC team on the EARF and safeguards and CCP requirements that need to be implemented during the Project</li> </ul>

Project implementation organisations	Management Roles and Responsibilities
	<ul style="list-style-type: none"> <li>▪ Consult with DEPC to confirm the process and safeguards instruments to be prepared to meet both EPC Act and SPS requirements</li> <li>▪ Undertake the screening of each subproject (including individual components such as water crossings at different locations) and identify main environmental impacts and prepare project descriptions</li> <li>▪ Prepare the environmental assessments for the selected or prioritised subprojects to meet the requirements of the EARF</li> <li>▪ Undertake adequate consultations with affected people and studies of the subproject area/catchment to identify baseline conditions and impacts</li> <li>▪ Prepare the environmental permit applications including subproject descriptions, screening forms, and assessments and after approval by MIPU and ADB, submit to DEPC for review</li> <li>▪ Ensure that disclosure of the draft assessments is done in accordance with the project's CCP in compliance with ADB's Public Communications Policy (2011) and requirements under the EPC Act</li> <li>▪ Arrange for a copy and the conditions of the environmental permit issued by DEPC to be sent to the ADB</li> <li>▪ During pre-construction, ensure that issues that need to be addressed by the design engineers are considered. Prepare a design brief containing main requirements for action by the construction team</li> <li>▪ Based on detailed designs, update the EMP from the approved environmental assessment. Integrate the revised/updated EMP and DEPC's environmental permit conditions into the construction section of the bid and contract documents</li> <li>▪ Arrange public consultation to advise affected communities of the scope and scheduling of the subproject and to raise awareness within the communities of the likely phasing of events that will occur within their boundaries</li> <li>▪ Following the award of the contract and prior to submission of the construction EMP (CEMP), provide EMP and safeguards induction for the contractor</li> <li>▪ Ensure that contractor has access to the environmental assessments of the subprojects and the environmental permit conditions issued by DEPC</li> <li>▪ Evaluate, and when satisfactory, advise MIPU (Engineer to the Contract) that the CEMP may be approved</li> <li>▪ Advise the contractor of their responsibilities to mitigate environmental impacts and implement the GRM for any issues associated with construction activities.</li> <li>▪ Supervise and monitor the contractor's compliance with the approved CEMP.</li> <li>▪ Issue defect notices concerning non-compliant work. Any instructions or requirements for corrective actions will be issued through the Engineer</li> <li>▪ Prepare reports of site visits and compliance checks at least every two months, compile quarterly progress reports (summary of compliance reports and contractor's monthly reports and any other safeguards activities including training seminars or workshops etc.), and prepare safeguards monitoring reports twice per year</li> </ul>
Contractor	<ul style="list-style-type: none"> <li>▪ Prior to construction, address the construction section of the EMP which will be developed into the detailed CEMP that addresses the development consent conditions and details working statements and</li> </ul>

Project implementation organisations	Management Roles and Responsibilities
	<p>methodologies as required by the EMP. It will include a monitoring plan and a reporting program</p> <ul style="list-style-type: none"> <li>▪ Submit the CEMP to MIPU for clearance</li> <li>▪ Designate an environmental and safety officer and deputy environmental and safety officer who will take lead responsibility for implementation of the CEMP</li> <li>▪ Provide briefings and training seminars for all workers (and sub-contractors) on the CEMP and safeguards requirements governing the Project</li> <li>▪ Following approval of the CEMP, the contractor is required to attend a site meeting where the CEMP is further discussed to ensure that all compliance conditions are clearly understood</li> <li>▪ Site engineer and environmental and safety officer will be responsible for daily supervision of the CEMP.</li> <li>▪ Undertake work as directed by the Engineer. If the work is non-compliant with the CEMP or conditions, the Contractor must respond to the defect notice issued and rectify the issue or work</li> <li>▪ Report on CEMP implementation, including grievance redress, in the monthly reports that will be submitted to MIPU. The report will also contain the monthly accident/incident report</li> </ul>

## 2.5 Monitoring arrangements

The monitoring arrangements will change throughout the life of the Project, through pre-construction, construction and post-construction phases.

In general, the DSC operates on behalf of PWD to review, monitor and record compliance with safeguards documents. To date, and during the remainder of the pre-construction phase, this will be on an as-needed basis and as a minimum, 6-monthly.

During construction, the minimum frequency of the monitoring will be monthly. The monitoring will be undertaken by the DSC, specifically, the national safeguards specialist and the national social, gender and community consultation specialist. This will be undertaken with PWD counterpart staff, where possible.

A construction site monitoring template is under development to ensure that all aspects of environmental and social requirements of the permits, consents, ADB policy, legislation, CEMP and project plans are complied with.

An asset management plan is also under development, which will include all aspects of environmental management required as a result of the Project. These will be part of the handover of responsibilities to PWD upon Project completion.

## 3 Environmental monitoring activities and status

### 3.1 Monitoring activities

#### 3.1.1 General activity overview

The July to December 2016 period was the **pre-construction** (feasibility and design) phase of the Project. During this time, the following environmental safeguards activities were undertaken:

- > Liaison with government departments and agencies, including DEPC, Department of Fisheries, Department of Forestry, Department of Biosecurity, Department of Agriculture, Department of Geology, Mines and Water Resources.
- > Site inspections
- > Community consultation
- > Co-ordination with social safeguards, climate change, engineering and other DSC specialists
- > Collaboration with PWD Safeguards Manager and ADB Senior Environmental Specialist
- > Subproject screening
- > Background study of existing environment
- > Impact assessment of each subproject
- > Contribution to subproject options, assessment, feasibility study report, design and review
- > Preparation of IEEs and Preliminary Environmental Assessment application, including EMPs

#### 3.1.2 Documents reviewed

During this reporting period, the key legislative and monitoring policy guidance documents reviewed were:

- > PAM
- > EARF
- > ADB SPS
- > Public Roads Act No. 35 of 2013
- > Foreshore Development Act
- > Land Management Act
- > Environmental Protection and Conservation Act [CAP. 283]
- > Foreshore Development Act No. 17 Of 2013
- > Physical Planning Act [CAP. 193] Act 22 of 1986
- > Water Resources Management Act No. 9 of 2002
- > Quarry Act No. 9 of 2013
- > Building Act No. 13 of 2013
- > Civil Aviation Act No. 5 of 2005

#### 3.1.3 Documents prepared

Before preparation of the draft feasibility study commenced, there was consultation with representatives of the ADB and DEPC in order to facilitate the preparation of the IEEs, as the IEEs were a requirement of the ADB's SPS (2009). There were several rounds of meetings and it was jointly agreed that two IEE documents would be prepared – one for the sub-projects to the East of Efate (12 subprojects) and one for those of west Efate (eight sub-projects). These documents would also include an appendix with additional information in the requested DEPC format for an Application for an Environmental Permit under the local legislation so that

the Department could also use the documents to help decide whether a further assessment would be required under the Environmental Management and Conservation Act, 2001.

A section of the feasibility study report (Section 8) was prepared, to describe the environmental assessment undertaken for the feasibility study and concept design. Contributions were also provided to other sections of the report, such as consultation and permits. The feasibility report was submitted as a draft on 27 October 2016 and as a final on 29 November 2016.

Two draft IEEs were prepared as appendices to the feasibility study report; one for the eight subprojects in western Efate and another for the twelve subprojects in eastern Efate. These were internally reviewed for compliance with the EARF prior to submission. They were externally reviewed by PWD and ADB and comments were provided to the DSC on 3 November 2016.

Responding to the comments led to a further approximately 100 pages being included in the final combined 350-page total of the IEE documents. Amongst other issues, the comments requested the summarised table of impacts and mitigations to be expanded into a written section of the report. Section 5 of the IEEs were extrapolated to achieve this.

These revised IEEs were then submitted to ADB on 23 November 2016 and these were approved as “draft final” reports on the same day.

As had been understood to have been agreed with DEPC, the application for environmental permit was prepared submitted to DEPC on 25 November as a single application for all 20 subprojects, with the approved draft final IEEs appended as supplementary information. DEPC provided a prepared written response on the same day, with alternative options for submitting the application for environmental permit in separate parts. A follow up meeting with DEPC on 7 December 2016 resulted in DEPC reconsidering their submission requirements. DEPC later confirmed the requirement for PWD to resubmit the application for environmental permit in seven separate parts, which was delivered on 20 December 2016.

#### **3.1.4 Fieldwork**

Construction has not yet commenced.

#### **3.1.5 Monitoring**

Monitoring undertaken during this period is shown in the table and outcomes described further below.

Table 3-1 Environmental monitoring requirements and status

Reference	Clause/Para.	Relevant Approving Authority	Requirement	Monitoring required	Output to be monitored	Monitoring frequency	Responsible	Update	Status	Date Completed	Additional reference
Environmental Management and Conservation Act	Environmental Impact Assessment Regulations Order No. Of 2011	Department of Environmental Protection and Conservation (DEPC)	The entire development requires approval under this Act. As determined by the Director, authorised under the Act	Observance of obtained permit	Environmental Permit	Monthly	PWD/ DSC	Application submitted 15/11/16 and resubmitted 20/12/16	In progress		
Foreshore Development Act	Schedule 5 subsection 3 (3) Section 5 & Section 9 (i)	Physical Planning Unit, Ministry of Internal Affairs	An application for consent is required for works below the mean high water mark, on and/or over the seabed	Observance of obtained permit	Foreshore Development Permit for relevant sites	Monthly	PWD/ DSC	Application submitted 15/12/16	In progress		
Physical Planning Act	Section 4 , 5 & 6	Shefa Provincial Council	The project sites are located within the Shefa Provincial Council. Some parts of Efate have been designated “physical planning area” and therefore development approval from the Council is needed	Observance of obtained permit	Permit	Monthly	PWD/ DSC	PWD confirmed this does not apply to this Project (8 Nov 2016)	Complete	8/11/2016	
Water Resources Management Act	Part 2, Section 7	Department of Geology, Mines, and Water Resources	An application is required for the construction, operation and maintenance of works relating to the protection, management and use of water including stormwater and wastewater	Observance of obtained permit	Permit	Pre-start - once only	PWD/ DSC	The Contractor is to obtain water extraction and working in waterways permit	Not started		
Quarry Act	Part 4, Division 2	Department of Geology, Mines, and Water Resources	An application is required for a quarry permit for construction materials (road base, aggregates), including quarry management plan	Observance of obtained permit, if required	Permit	Pre-start - once only	PWD/ DSC	The Contractor is to obtain quarry permit if operating their own quarry	Not started		
Building Act No. 13 of 2013	Part 3, Section 7, 8 and 9	Public Works Department (PWD)	Building permit	Observance of obtained permit	Permit	Monthly	PWD/ DSC	PWD confirmed this does not apply to this Project (8 Nov 2016)	Complete	8/11/2016	
Civil Aviation Act No. 5 of 2005	Part 4 Section 32, Section 53 (2) b	Civil Aviation Authority	For all work that requires crange or piling within the controlled airspace radius, a permit may be required. This affects Prima, Mele and Klems Hill subproject sites	Observance of obtained permit, if required	Permit	Pre-start - once only	PWD/ DSC	Contractor is required to consult Airports Vanuatu to obtain clearance or permit, as required	Not started		
EARF	Para 50	ADB	Implement objectives of ADB SPS: (i) avoid adverse impacts on environment and affected people, where possible; (ii) minimise, mitigate and/or compensate if not possible to avoid; and (iii) help strengthen in-	Screening, consultation, MOU, EMP and use of government systems	DDR (incl MOU), IEE (incl EMP), application for environmental permit submission	Quarterly	DSC	DDR approved as draft final on 21/11/16 IEE approved on 23/11/2016 application for environmental permit submission on 25/11/16 and 20/12/16	In progress	20/12/2016	ADB Safeguards Policy; Para 51 PAM Para. 104 (vi)

Reference	Clause/Para.	Relevant Approving Authority	Requirement	Monitoring required	Output to be monitored	Monitoring frequency	Responsible	Update	Status	Date Completed	Additional reference
			country safeguards systems								
EARF	Para 53	ADB	Adherence to ADB's safeguards due diligence	(i) Potential risks identified (ii) Effective measures incorporated (iii) Borrower capacity to manage risks (iv) Role of third parties defined in safeguards docs (v) Consultations conducted in accordance with ADB requirements	DDR (incl MOU), IEE (incl EMP), TPV report	Quarterly	DSC	DDR approved as draft final on 21/11/16 IEE approved on 23/11/2016 TPV completed 20/12/2016	Complete	20/12/2016	
EARF	Para 54-55	ADB	Provide workers with a safe and healthy working environment	Compliance with Labour Act (Amended) 2009 and Health and Safety at Work Act 1987 and international good practice, as reflected in internationally recognized standards such as the World Bank Group's Environmental Health and Safety Guidelines	Requirements of these docs need to be extracted and made into a checklist	Monthly	Government		In progress		
EARF	Para 56,123,124	ADB / MIPU	GoV and ADB requirements for monitoring complied with and reports prepared accordingly	Monthly and Quarterly progress reports submitted, including environmental and social safeguards monitoring report. Semi-annual safeguards monitoring reports submitted	Monthly and Quarterly progress report, Semi-annual safeguards report	Monthly	DSC		In progress		

Reference	Clause/Para.	Relevant Approving Authority	Requirement	Monitoring required	Output to be monitored	Monitoring frequency	Responsible	Update	Status	Date Completed	Additional reference
EARF	Para 68-71	ADB/ GoV	Design and location impacts are identified and mitigation and monitoring measures are outlined during design stage	Monitoring of management and mitigation measures developed for the following design and location impacts: i) Climate change ii) Run-off Management Design iii) Flora, Fauna, and protected areas and iv) Land acquisition.	Feasibility study report (FSR) and detailed design inclusion of measures	Upon completion of FSR and design documents	DSC		Complete		
EARF	Para 89	DEPC/ ADB	Environmental Screening	Screening is undertaken at feasibility stage of the project	IEE includes screening outcomes	Upon completion of FSR	DSC	IEEs - Appendix E of FSR	Complete		PAM Para 95 (iii)
EARF	Para 91-99, 122	DEPC/ ADB	EMP complies with clause 9 (1) and (2) of EIA Regulations and outlines: i) Risks ii) Mitigation measures iii) Monitoring measures iv) Implementation Arrangements v) Performance Indicators. EMP contains a suitable reporting program for subprojects and monitoring checklist for every two months in addition to daily CEMP compliance.	Confirmation of IEE and EMP approved by ADB and DEPC	Approved IEE	Upon completion of IEE	DSC	IEEs - Appendix E of FSR, approved by ADB, awaiting confirmation from DEPC	In progress		
EARF	Para 100-102	ADB / DEPC	Consultation with affected parties and stakeholders as part of environmental assessment is held and recorded as required under the EPCA and SPS	IEE documents consultations held and responses and complies with ADB SPS and Public Communications Policy 2011 and GoV requirements in EPCA for information disclosure	IEE includes consultations undertaken and is disclosed	Upon completion of IEE	DSC		Complete		PAM, Para 50, 59 (iv), 61(iii), 104 (i), 107(i), 137 (calls it a Comms and Consultation Plan) Financing Agreement (Loans), Sched. 6, Para. 17 says 12 months from Effective Date
EARF	Para 102	ADB	A Community Consultation Plan (CCP) is developed and established	Observance of CCP	CCP is developed through consultation, approved, established and documented.	Upon completion of CCP	DSC	Approved by ADB 6/10/2016	Complete	6/10/2016	

Reference	Clause/Para.	Relevant Approving Authority	Requirement	Monitoring required	Output to be monitored	Monitoring frequency	Responsible	Update	Status	Date Completed	Additional reference
EARF RF	Para 103-104 Para 69-72	ADB	Grievance Redress Mechanism (GRM)	Establish GRM using similar principles to current project implementation in Vanuatu (VISSP, PVUDP), including establishing the GRM in consultation with relevant stakeholders - Community leaders, MIPU, CLMO, Vaturisu Council of Chiefs	Approved and established prior to commencement of construction	Quarterly	DSC		Not started		PAM, Para 10, 104 (iv), 130, 143
EARF	Para 124	ADB	Disclose semi-annual safeguards reports	Disclosure on ADB website	Disclosure on ADB website	6 monthly	DSC		Not started		
PAM	Para. 130		GRM committees will include both women and men		Attendance sheets for GRM meetings	Monthly	DSC		Not started		
PAM	Para. 39		Landmark, tourist attraction feature	Review of design documents	Inclusion in design	Upon completion of design	DSC	Phase II @ Tassiriki	Planned		
PAM	Para. 61 (vi)		Six-monthly Safeguards monitoring reports submitted to ADB	Observance of report	Report submission to ADB	6 monthly	DSC	July - December 2016 Monitoring report drafted	In progress		
PAM	Para. 95 (iii)		Prepare Project Description and applications to DEPC for level of EIA required	Application for environmental permit submitted	PEA from DEPC	Upon submission	DSC	Submitted to DEPC 25 Nov 2016	Complete	25/11/2016	
PAM	Para. 95 (v)		Draft EIA to be submitted to MIPU/ADB for review prior to submission to DEPC	IEE document	IEE	Upon submission	DSC	Submitted to and approved by ADB and PWD	Complete	24/11/2016	
PAM	Para. 95 (vi)		Disclose EIA and permits as required by Van Govt and ADB	Disclosure on ADB website	Disclosure on ADB website	once	DSC		Not required yet		
PAM	Para. 95 (vii)		Integrate Environmental approval/permit with tender documentation and design	Review of approval conditions being included in design and tender documents	Inclusion of conditions	Upon completion of design	DSC	Approval conditions not yet received from DEPC. When received, these will be incorporated into an update of the design and tender documents. The timing of this will determine the extent to which these conditions form part of the general tender documents or become later inclusions during contract negotiations	Not required yet		

Reference	Clause/Para.	Relevant Approving Authority	Requirement	Monitoring required	Output to be monitored	Monitoring frequency	Responsible	Update	Status	Date Completed	Additional reference
PAM	Para. 96 (i)		Prepare waste, traffic, materials, erosion, drainage and health and safety management plans	Review of plans submitted by contractor, in accordance with EMP	Plans submitted by contractor	Pre-start - once only	DSC	By contractor as part of CEMP	Not required yet		
PAM	Para. 97 (iii)		Template for environmental monitoring reporting	Observance of template(s)	Template	Pre-start - once only	DSC	under development	In progress		

## **3.2 Monitoring outcomes**

### **3.2.1 Compliance**

Compliance outcomes for the monitoring undertaken during this period are shown in **Table 3-1**.

While there are no non-conformances as yet, the key issue for environmental safeguards is the delay in the review and approval of the Project's environmental permit. Conflicting advice and the limited capacity of DEPC led to an application for environmental permit submission which needed re-formatting and then needed to be resubmitted. This process took one month to be resolved. The risk of this delay is that further environmental assessments will be requested and that consent conditions will now not be included in the original tender documents. These may need to be imposed later and this may lead to cost risk implications.

Actions being taken to manage this are proactive follow up and communication between PWD and DEPC to ensure the permit is reviewed and issued during the tender period, so that any requirements can be issued to tenderers as an addendum.

Non-conformance and actions taken are described further below.

### **3.2.2 Key non-conformances**

Nil

### **3.2.3 Corrective measures**

Nil

## 4 Social safeguards monitoring activities and status

### 4.1.1 General activity overview

The July to December 2016 period was the **pre-construction** (feasibility and design) stage of the Project. During this time, the following social safeguards activities were undertaken:

- > Liaison with community leaders to obtain early work consent for geotechnical investigations and topographical survey at each subproject site
- > Liaison with government departments and agencies, including Department of Lands, Custom Lands Management Office, Department of Women's Affairs, Ministry of Health and Shefa Provincial Government
- > Liaison with civil society groups, including Chamber of Commerce, Vanuatu National Council of Women, international non-government organisations (Save the Children, Red Cross)
- > Consultation with community leadership, including Vaturisu Executive Council (Efate Chiefs) and Malvatumauri Chiefs (Efate Council of Chiefs) briefing
- > Two area-level village consultations (Epau and Mele) for all 13 project villages along the ring road area
- > Community level consultations (14 villages)
- > Collaboration with PWD Safeguards Manager and ADB Senior Environmental Specialist
- > Subproject screening
- > Social Impact assessment of each subproject
- > Contribution to subproject options, assessment, feasibility study report, design and review
- > Preparation of social safeguards DDR
- > Planning, preparation, awareness and execution of agreement and signing of Memorandum of Understanding (MOU) for each subproject, including third party validation

### 4.1.2 Documents reviewed

During this reporting period, the key documents reviewed are:

- > PAM
- > RF
- > ADB SPS
- > Custom Land Management (Amendment) Act No. 12 of 2014
- > Land Leases Act [CAP. 163]
- > Public Roads Act No. 35 of 2013
- > Land Surveyors Act [CAP. 175]
- > Land Acquisition Act 1992 [CAP. 215]
- > Land Acquisition (Amendment) Act 2014 (No. 31 of 2014)
- > Land Reform Act [CAP. 123]
- > Customary Land Tribunal Act No. 7 of 2001 [CAP. 271]
- > Customary Land Management Act No. 33 of 2013
- > Foreshore Development Act [CAP. 90]
- > Municipalities Act [CAP. 123] and Decentralization Act [CAP. 230]

#### **4.1.3      Documents prepared**

A section of the feasibility study report (Section 8) was prepared, to describe the environmental assessment undertaken for the feasibility study and concept design. Contributions were also provided to other sections of the report, such as consultation and permits. The feasibility report was submitted as a draft on 27 October 2016 and as a final on 29 November 2016.

Two draft IEEs were prepared as appendices to the feasibility study report

#### **4.1.4      Fieldwork**

Construction has not yet commenced.

#### **4.1.5      Monitoring**

Monitoring undertaken during this period is shown in the table and outcomes described further below.

Table 4-1 Social safeguards monitoring requirements

Reference	Clause/Para.	Relevant Approving Authority	Requirement	Monitoring required	Output to be monitored	Monitoring frequency	Responsible	Update	Status	Date Completed	Additional reference	Enviro/Social
Customary Land Management Act No. 33 of 2013	Part 2, Section 7	Customary Land Management Office	Consent for use of land for Project work sites	Observance of signed Memoranda of Understanding (MOUs)	MOU	Monthly	PWD/ DSC	MOU signing process undertaken on 17 and 21 Nov 2016 NOTE: If Contractor requires additional areas for use during construction, this will require further negotiation and agreement	Complete	21/11/2016	Custom Land Management (Amendment) Act No. 12 of 2014; Land Leases Act [CAP. 163]; Land Surveyors Act [CAP. 175]; Land Acquisition Act 1992 (CAP. 215); Land Acquisition (Amendment) Act 2014 (No. 31 of 2014); Land Reform Act [CAP. 123]; Customary Land Tribunal Act No. 7 of 2001 [CAP. 271]; Municipalities Act [CAP. 123] and Decentralization Act [CAP. 230]; Public Roads Act No. 35 of 2013	S
EARF RF	Para 103-104 Para 69-72	ADB	Grievance Redress Mechanism (GRM)	Establish GRM using similar principles to current project implementation in Vanuatu (VISSP, PVUDP), including establishing the GRM in consultation with relevant stakeholders - Community leaders, MIPU, CLMO, Vaturisu Council of Chiefs	Approved and established prior to commencement of construction	Quarterly	DSC		Not started		PAM, Para 10, 104 (iv), 130, 143	E/S
RF	Para 46	ADB	Each subproject will be screened for its land acquisition and resettlement impacts	Review of screening documentation	Screening process and outcomes documented in DDR	Upon completion of DDR	DSC	Approved by ADB 6/10/2016	Complete	6/10/2016	PAM Para. 104 (ix-xii)	S

Reference	Clause/Para.	Relevant Approving Authority	Requirement	Monitoring required	Output to be monitored	Monitoring frequency	Responsible	Update	Status	Date Completed	Additional reference	Enviro/Social
RF	Para 47	ADB	DDR prepared and includes: (i) SLO approved and signed MOUs signed by custom landowners and third party validators; (ii) agreed terms and conditions; (iii) any compensation; (iv) consultations with GoV stakeholders and affected communities (v) Process to obtaining MOUs; Names of Custom Land owners and leaseholders are verified by Custom Land Management Office (CLMO) and Department of Lands (DoL).	Observance of DDR, including all requirements	DDR adhering to all requirements	Upon completion of DDR	DSC	Approved by ADB 6/10/2016	Complete	6/10/2016		S
RF	Para 66	ADB / MIPU	Consultation and information disclosure processes are adhered to	Consultation with affected communities and chiefs, and assessment of losses and impact conducted and documented and reported.	Attendance sheets for consultation meetings	Monthly	DSC	Consultations and MOUs completed. These are appended to the DDR. Attendance sheets confirmed. Process ongoing, re loss impact assessments	In Progress			S
PAM	Para. 130		GRM committees will include both women and men		Attendance sheets for GRM meetings	Monthly	DSC		Not started			E/S
PAM	Para. 33		Gender sensitive design	Review of design documents	Inclusion of gender sensitive design features	Upon completion of design	DSC	Section in design reports	Complete	9/12/2016		S
PAM	Para. 39		Landmark, tourist attraction feature	Review of design documents	Inclusion in design	Upon completion of design	DSC	Phase II @ Tassiriki	Planned			E/S
PAM	Para. 50		Engage an NGO for STI/HIV/AIDS education awareness and prevention campaigns Also prepare and support implementation of CCP	Engagement of NGO	Contract arrangement with NGO	Once	DSC	Price evaluation underway	In progress			S
PAM	Para. 50		Resettlement and community consultation meetings will involve women	30% of participants are women (agreed at inception)	Attendance sheets for consultation meetings	Monthly	DSC	28% Women	In progress		PAM Para. 130	S

Reference	Clause/Para.	Relevant Approving Authority	Requirement	Monitoring required	Output to be monitored	Monitoring frequency	Responsible	Update	Status	Date Completed	Additional reference	Enviro/Social
PAM	Para. 50		Resettlement and community consultation meetings will be conducted by both male and female facilitators	At least 50% female facilitators	Attendance sheets for consultation meetings	Monthly	DSC	50% women (Simon and David/Keith, Jennifer and Christy)	Complete	1/09/2016	PAM Para. 130	S
PAM	Para. 61 (vi)		Six-monthly Safeguards monitoring reports submitted to ADB	Observance of report	Report submission to ADB	6 monthly	DSC	July - December 2016 Monitoring report drafted	In progress			E/S
PAM	Para. 73 (ix)		Provide pathways to streams, steps, laundry tubs, where identified by communities	Review of design documents	Inclusion in design	Upon completion of design	DSC	Included in the design at Mele, Epau, Pangpang	Complete	9/12/2016		S
PAM	Para. 104 (xiii)		Implement system for monitoring social safeguards compliance and inputs to QPR and 6-month Safeguards report	Observance of system	System in place	Pre-start - once only	DSC	under development	In progress		PAM Para. 105 (iv)	S
PAM	Para. 107 (viii)		Gender and Social Awareness seminar for PWD and MIPU staff	Attendance sheet from seminar	Seminar	Once	DSC	Planned for induction period for contractor during mobilisation	Not required yet			S

## **4.2 Monitoring outcomes**

### **4.2.1 Compliance**

Compliance outcomes for the monitoring undertaken during this period are shown in **Table 4-1**.

There are no outstanding compliance issues for social safeguards. The DDR will be updated and reissued ahead of the tender and will form one of the supplementary information documents in the tender.

### **4.2.2 Key non-conformances**

Several issues arose during the period, which are not considered to be non-conformances, but which bear mentioning.

Firstly, during the early works phase, consents were obtained for geotechnical investigations and topographical survey. These were negotiated and agreed directly between PWD and the landowners or chiefs, as appropriate. During geotechnical investigations at Teouma Bridge, DEPC received a misinformed complaint that works had commenced on a temporary bridge crossing for the proposed JICA-funded project at Teouma Bridge. This complaint was forwarded to PWD for explanation. PWD were able to clarify the nature of the work being undertaken, the consent that was obtained prior to work starting, the ownership status of the land and thus the legitimacy of the works at the site.

Secondly, one landowner, not directly affected by the subproject at Epule, was invited but chose not to sign the MOU for Epule. This is documented in the minutes of the MOU process (refer Appendix I of the Due Diligence Report) and will not have a material effect on the progress of works at the site.

A third incident occurred during the period, which is unrelated to the operations of the Project but which did impact the design. Significant earthworks were undertaken by others during August 2016, in and around the waterway at Creek Ai. It is not known who undertook these works or the purpose of them. However, the work had a notable impact on the flow regime and waterway characteristics and a second topographical survey was required to represent the changes in the engineering design. This creek is known as a habitat for the Creek Ai Goby, only recently identified, which is described as near threatened. Creek Ai is the only stream listed in the Vanuatu National Biodiversity Strategy Action Plan in its highest category, as an Important Place. The work is understood (from DEPC) to have been undertaken without an environmental permit and thus appears to represent a significant breach.

### **4.2.3 Corrective measures**

Stemming from the issue of a complaint regarding the works at Teouma Bridge, it is noted that improved communication from PWD/DSC to DEPC of Project related activities is required, so that DEPC are aware of works and agreements in place.

## 5 Grievance redress mechanism

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The GRM will be established by the contractor upon commencement. A draft GRM is included in Section 7 of the IEEs.

In the absence of a GRM, the following opportunities were provided for issues to be raised by the community:

- > Liaison with community leaders to obtain early work consent for geotechnical investigations and topographical survey at each subproject site
- > Two area-level village consultations (Epau and Mele) for all 13 project villages along the ring road area (8 and 10 August respectively)
- > Presentation and consultation with Vaturisu Executive Council (19 August 2016)
- > Presentation and consultation with Malvatumauri Chiefs (Efate Council of Chiefs) briefing (29 September 2016)
- > Community level consultations (14 villages) over four days (29 August to 1 September 2016)

Indirect community representatives were also consulted:

- > Liaison with government departments and agencies, including Department of Lands, Custom Lands Management Office, Department of Women's Affairs, Ministry of Health and Shefa Provincial Government
- > Liaison with civil society groups, including Chamber of Commerce, Vanuatu National Council of Women, international non-government organisations (Save the Children, Red Cross)

These broad and frequent consultations established an understanding of the Project with the relevant community and leadership stakeholders. Many of the knowledge gained and issues raised informed the engineering design.

Upon this foundation, the MOU consultation process was delivered, over a 6-week period, during October-November 2016. During these frequent and detailed consultations with landowners, grievances, issues, reservations or concerns of any nature could be aired, either by communities, CLMO or Department of Lands. Ultimately, all direct and adjacent landowners signed the MOUs on 17 and 21 November.

In accordance with the Community Consultation Plan, the Project staff will meet with communities again early in Q2 2017, to inform them of progress on the Project, advise on the process that will be undertaken to establish the GRM, disclose the DDR and provide opportunity for any concerns and issues to be raised.

## 6 Disclosure

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The following documents were disclosed during the monitoring period:

- > Community Consultation Plan – ADB, 6 October 2016
- > Draft Final Initial Environmental Examination, Western Efate – ADB, 23 November 2016
- > Draft Final Initial Environmental Examination, Eastern Efate – ADB, 23 November 2016

## 7 Capacity building

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The PWD Environment and Social Officer, Uravo Nafuki, has demonstrated admirable ability to work within the system and obtain results. The DSC has been ably supported and led as necessary, in consultation logistics, protocols, who to consult, sensitivities, requirements, approvals and proactive follow up. Uravo's support officer, Jason Andrews, is developing but is also quite capable and is able to operate in Uravo's absence. While no specific capacity building is proposed under the Project, an opportunity to undertake a week long regional ADB safeguards refresher course would be valued by these frontline staff.

A broader PWD safeguards awareness opportunity has been identified, to take place as part of the Contractor's mobilisation activities in Q2 2017 and will be reported on in the next semi-annual report.

Some shortcomings have been observed regarding the capacity of DEPC to regulate and enforce all activities, as the evidently unauthorised works at Creek Ai demonstrate (refer **Section 4.2.2**). It is noted in **Section 3** that there is limited capacity within DEPC for management, adequate review and timely turnaround of applications for environmental permits, particularly large or more complex submissions. The DSC can render assistance to DEPC for the purposes of this Project. However, these observations above could be discussed further with PWD and ADB as to whether any assistance is sought to strategically support DEPC, in combination with efforts already underway by ADB and others.

## 8 Conclusion and recommendations

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The DSC have worked collaboratively with PWD to achieve a high level of consultation and agreement with the community on the proposed Project works.

The key outstanding issue is the environmental permit and this is being actioned as described in **Section 3.2.1**.

Templates for site monitoring will be developed during the next reporting period, ahead of construction starting in June 2017.