

# MARITIME INVESTMENT FOR CLIMATE RESILIENT OPERATIONS

Updated Environmental and Social  
Management Plan for  
Funafuti Port (co-funded by MICRO and  
MICRO II Additional Financing) (P181595)

Prepared for:

Ministry of Public Works, Infrastructure, Environment, Labour,  
Meteorology, and Disaster, Government of Tuvalu World Bank

## Quality Information

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## Acronyms and Abbreviation

ADB	Asian Development Bank
AOI	Area of Impact
AP	Affected Persons
CA	Conservation Areas
CBD	Convention on Biological Diversity
C-ESMP	Contractors Environmental and Social Management Plan
CLO	Community Liaison Officer
CMS	Convention of Migratory Species
DOE	Department of Environment
EA	Executing Agency
EISA	Environmental and Social Impact Assessment
EKT	Ekalesia Kelisiano Tuvalu
EPA	Environmental Protection Act
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESR	Environmental and Social Receptor
GBV	Gender Based Violence
GoTv	Government of Tuvalu
GRM	Grievance Redress Mechanisms
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immune Deficiency Syndrome
IA	Implementing Agency
IEE	Initial Environmental Examination
ILO	International Labour Organisation
IUCN	International Union for Conservation of Nature
LCC	Live coral cover
LMMA	Locally Managed Marine Area
LMP	Labour Management Procedure
MPWIELMD	Ministry of Public Works, Infrastructure, Environment, Labour, Meteorology, & Disaster
MLGA	Ministry of Local Government, & Agriculture
MJCF	Ministry of Justice, Communications, & Foreign Trade
MICRO	Maritime Investment for Climate Resilient Operations
MSL	Mean Sea Level
NBSAP	National Biodiversity Strategies and Action Plan
NCD	Non-Communicable Diseases
NEMS	National Environmental Management Strategy

NGO	Non-Governmental Organisation
OIMP	Outer Island Maritime Investment Project
OP	Operational Policy
PEAR	Preliminary Environmental Assessment Report
PM	Project Manager
PMU	Project Management Unit
PWD	Public Works Department
SECP	Stakeholder Engagement and Consultation Plan
SPREP	Secretariat of the Pacific Regional Environmental Program
SPC	South Pacific Commission
SWA	Solid Waste Agency
SWMP	Solid Waste Management Plan
TC	Tropical Cyclone
TCAP	Tuvalu Coastal Adaptation Project
TEC	Tuvalu Electric Corporation
TMP	Traffic Management Plan
TOR	Terms of Reference
TTC	Tuvalu Telecommunications Corporation
TvAIP	Tuvalu Aviation Investment Project
UNDP	United Nations Development Program
USP	University of South Pacific
WB	World Bank
WMD	Waste Management Department
WMP	Workers Management Plan
YCA	Yellow Crazy Ant

## Executive Summary

The Government of Tuvalu (GoTv) has requested support from the World Bank (WB) to develop a stronger, more resilient maritime sector and provide improved access to and from outer islands. The objective of the Tuvalu Maritime Investment in Climate Resilient Operations (MICRO) Project is to “improve the climate resilience of the Funafuti Port, and in the event of an Eligible Crisis or Emergency, to provide an immediate response to the Eligible Crisis or Emergency and in the event of an Eligible Crisis or Emergency, to provide an immediate response to the Eligible Crisis or Emergency.”

The Funafuti Port of MICRO is to be co-financed by MICRO II Additional Funding therefore, the Labour Management Procedure (LMP) and Stakeholder Engagement Plan (SEP) produced for all MICRO II projects will be implemented in conjunction with this updated Environmental and Social Management Plan (ESMP). The Funafuti Port works<sup>1</sup> were developed under the Safeguards policies as they applied to MICRO. Under MICRO2, it will be governed by the World Bank Environmental and Social Framework (ESF). There are no new environmental risks expected for the additional Funafuti Port works, which have the same infrastructure typologies and the same nature of impacts as those already identified for the works proposed for other ports under the MICRO2 footprints. The implementing agency has updated Environmental and Social Management Plan (ESMP), to meet the requirements of relevant Environmental and Social Standards (ESS) under the ESF. The CPMO national safeguards specialist and international safeguards adviser will continue support during project implementation. The key environmental impacts identified for the Funafuti Port works include disturbance of the foreshore, solid waste management, water quality impacts in the nearshore environment, and wastewater management. Appropriate mitigation measures are included in this ESMP, aligning with the national regulations and the World Bank Group’s ESF requirements.

The overall objective of this updated ESMP is to provide for the climate resilient infrastructure solutions for the Funafuti Port improvement, including all ancillary infrastructure works. As part of the process, an Environmental and Social Impact Assessment (ESIA) completed in 2018 undertook the screening and scoping of the potential impacts, a description of the baseline conditions, the predicted qualitative and quantitative impacts from the project activities and the ESF management and monitoring plans. While the 2018 ESIA is no longer proportionate, this ESMP highlights the ESF management and monitoring plans.

The ESMP’s management and monitoring strategies specifically target the primary impacts identified for the Funafuti Port improvement, focusing on the protection of the foreshore, solid waste management, wastewater management, and the preservation of water quality in the nearshore environment. These impacts are characterized as site-specific, temporary, and reversible, primarily occurring during the construction stage.

To effectively address these impacts, the ESMP will be implemented through a detailed Contractors’ ESMP, accompanied by its associated management plans specified in Appendices A and B. The ESMP and the inclusion of these plans are crucial for mitigating the identified impacts. Regular supervision and monitoring of the ESMP implementation will be conducted to ensure its effectiveness throughout the project lifecycle.

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<sup>1</sup> Funafuti Port works include Reconstruction of wharf pavement; rehabilitation of existing seawall; and Renovation of the existing Warehouse.

## 1 Introduction

The Government of Tuvalu has requested support from the World Bank to develop a stronger, more resilient maritime sector and provide improved access to and from the outer islands. The objective of the Tuvalu Maritime Investment in the Climate Resilient Operations (MICRO) Project is to “improve the climate resilience of Funafuti Port, and in the event of an Eligible Crisis or Emergency, to provide an immediate response to the Eligible Crisis or Emergency.”

MICRO builds on work already started by the Asian Development Bank (ADB) in the Tuvalu Outer Island Maritime Infrastructure Project (OIMIP) and the work undertaken in the Exploratory Study of Ship Landing Facilities at Niutao and Nanumaga (Deltares, 2017) (also called the Vulnerability Assessment) to validate the design options against climate hazard models and environmental data. Recommended design solutions were included in the assessment and was the basis for initial concept designs.

Funafuti Port works include Reconstruction of wharf pavement; Rehabilitation of existing seawall; and Renovation of the existing Warehouse. The MICOR II Additional Financing (P181595, US\$40 million) will fund cost increases for the maritime infrastructure improvement works in the three outer islands: Nanumaga, Nanumea and Nukufetau, as well as the Funafuti Port rehabilitation works. The Funafuti Port works, originally solely financed under MICRO, has been delayed by several years and faces an emerging cost increase. The Funafuti port is an only international port in Tuvalu and has a critical role to receive imported cargo, including food supply and to store containers. The delay is attributable to (i) the COVID-19 global pandemic; (ii) damage from Tropical Cyclone Tino in 2020 and (iii) failure of three procurement processes for the works between 2019 and 2022, due to limited market interest and high bid prices received. After the third competitive procurement failed, the World Bank and the GoTV agreed to proceed with direct contracting and signed an AU\$19.66 million contract (US\$13 million equivalent) on November 10, 2023, while MICRO can finance US\$5 million for the works. In a letter dated November 16, 2023, GoTV requested MICRO2 financing for Funafuti Port rehabilitation works to fill a financial gap. It is expected that MICRO2 finance the remaining US\$8 million. The works were mobilized in February 2024 and are expected to be completed by the end of October 2024.

The Funafuti port rehabilitation activities of MICRO are to be co-financed by MICRO II Additional Financing<sup>2</sup> and are treated as new for the AF as they were not covered in the FA of MICRO 2. Therefore, the PMU updated its ESMP (in March 2024) to align with the ESF requirements for Funafuti Port works based on its 2018 ESIA. Funafuti Port works will have similar environmental impacts and the same nature and magnitude as those already identified for the works proposed for the other ports. Further, the Labour Management Procedure (LMP) and Stakeholder Engagement Plan (SEP) produced for all MICRO 2 projects will be implemented in conjunction with this Environmental and Social Management Plan (ESMP). The LMP includes terms and conditions of employment, non-discrimination, and equal opportunity (which includes a safe work environment free from violence and sexual harassment), workers' organizations, restrictions on child and forced labour, and occupational health and safety (OHS) in design, construction, and operational phases. The SEP will outline a structured approach for community outreach and two-way engagement with stakeholders, in appropriate languages, and adopting measures to include vulnerable and disadvantaged groups (poor, disabled, elderly, isolated communities), and will be based upon meaningful consultation and disclosure of appropriate information.

The MICRO project entails designing and constructing enhancements for Funafuti Port, Tuvalu's international cargo ship terminal, with a key focus on major improvements, including the paving of the cargo handling area. This initiative aims to elevate the port's functionality and efficiency.

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<sup>2</sup> Also referred as MICRO 2.



## 1.1 Scopes and Objectives

The environmental and social risk screening of the MICRO ESIA<sup>3</sup> confirms a Category B for the Project. It finds that the potential impacts are less than significant, site specific, mostly reversible and that a range of potential measures for mitigation can be readily designed in the majority of cases.

To support the implementation of this Category B project, this Environmental and Social Management Plan (ESMP) has been produced to ensure the integration of environmental and social stewardship into the Project as required by the Government of Tuvalu's relevant laws and regulations and the Environmental and Social ESF Policies of the World Bank.

The Funafuti Port works were developed under the Safeguards policies as they applied to MICRO. Under MICRO2, it will be governed by the World Bank Environmental and Social Framework (ESF). There are no new environmental risks expected for the additional Funafuti Port works, which have the same infrastructure typologies and the same nature of impacts as those already identified for the works proposed for other ports under the other MICRO2 footprints. The implementing agency has updated is currently updating MICRO's existing ESF instruments for Funafuti Port works, which comprise an Environmental and Social Impact Assessment (ESIA) 2018/Environmental and Social Management Plan (ESMP), to meet the requirements of relevant Environmental and Social Standards (ESS) under the ESF. The CPMO national ESF specialist and international ESF adviser will continue support during project implementation. The key environmental impacts identified for the Funafuti Port works include disturbance of the foreshore, solid waste management, water quality impacts in the nearshore environment, and wastewater management. Appropriate mitigation measures are included in this ESMP, aligning with the national regulations and the World Bank Group's ESF requirements.

The overall objective of this updated ESMP is to provide for the climate resilient infrastructure solutions for the Funafuti Port improvement, including all ancillary infrastructure works. As part of the process, an Environmental and Social Impact Assessment (ESIA) completed in 2018 undertook the screening and scoping of the potential impacts, a description of the baseline conditions, the predicted qualitative and quantitative impacts from the project activities and the ESF management and monitoring plans. While the 2018 ESIA is no longer proportionate, this ESMP highlights the ESF management and monitoring plans. The ESMP also focuses on ESF management through project implementation by providing clear instructions, responsibilities, and guidelines to Contractor, Engineers, and the MICRO Project Management Unit (PMU). Specifically, this ESMP includes the following components:

**Consultations:** A summary of the stakeholder engagement to date and a consultation plan is detailed to ensure adequate ongoing engagement with the affected people, especially with those involved in discussing how they are affected by the Project and the range of measures for reducing the potential identified impacts.

**Mitigation:** The ESMP identifies feasible and cost-effective measures that may reduce potentially significant adverse environmental impacts to acceptable levels. The plan includes compensatory measures if mitigation measures are not feasible, cost-effective, or sufficient.

**Monitoring:** The ESMP identifies monitoring objectives and specifies the type of monitoring, with linkages to identified impact and mitigation measures. For all monitoring requirements, the technical parameters are defined along with appropriate responsibilities and reporting procedures.

**Grievance Redress Mechanism:** A mechanism for receiving and addressing all grievances and complaints related to the Project is set out in the ESMP. It seeks to resolve all complaints as quickly as possible to the satisfaction of the aggrieved party.

**Implementation Arrangements, Schedule, and Costs:** The ESMP includes a description of implementation arrangements, including the roles and responsibilities of the Project Management Unit, Implementing Agencies, Contractors, Engineers, and Project consultants. The ESMP also builds the scheduling of measures

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<sup>3</sup> The Funafuti port ESIA was completed in 2018 as part of the Maritime Investment for Climate Resilient Operations - Environmental and Social Impact Assessment: Nanumaga Harbour and Funafuti Port.

into its planning, including phasing and coordination with overall Project implementation plans. Where appropriate, capital, and recurrent cost estimates and sources of funds for implementation of the ESMP have been estimated.

**Capacity Development and Training:** The ESMP identifies any gaps in institutional capacity and recommends measures and costs to address them.

## 1.2 Integration of the ESMP

It is the responsibility of the MICRO PMU, to ensure that the MICRO ESMP is fully integrated into all Project preparation and planning. The ESMP shall form part of any bid documentation for physical works, and it shall be the Client's responsibility to ensure that the technical requirements and data sheets of Project bid documentation are subject to review against this ESMP to ensure that all appropriate ESF measures are captured at the bid stage. It is further the responsibility of the PMU to ensure that this ESMP is considered in the review of any Terms of Reference (TOR) for Technical Assistance developed for the Project. The ESF requirements for any design or supervision of the Project will be fully integrated into the TOR to ensure that all ESF responsibilities allocated within the ESMP are part of the tender stage. In this way, the ESMP will be fully integrated within the Project so that the required measures will be fully considered and accepted by all responsible parties to achieve successful implementation.

## 1.3 Disclosure

As part of the requirements of GoTv law and World Bank policy, the ESMP is to be publicly disclosed and will be the responsibility of the MICRO PMU. The PMU will ensure the ESMP Executive Summary is translated into Tuvaluan prior to disclosure in hard copy and on their website. Likewise, the PMU and the MPWIELMD will ensure that several copies of all prepared ESF instruments are available locally at the PMU office and the MPWIELMD office, easily accessible to all stakeholders, including the affected people and local NGOs. The ESMP is a dynamic document and will be reviewed, updated, and approved as necessary throughout the implementation of the Project. For each approved updated version of this ESMP, the MICRO Project Manager will be responsible for disclosure through the above channels.

# 2 Project Description

## 2.1 Funafuti Port

Funafuti Port is located towards the northern end of Fongafale Island, approximately 1km from the main administrative centre of Funafuti. The port is on an 80m wide section of island and is on the western shore within the sheltered lagoon of Fongafale. It has two deep water berthing docks and a port operations area totalling approximately 9,000m<sup>2</sup> of which the 6,000m<sup>2</sup> container storage area is the site for this Project. The Funafuti Port is surrounded by commercial businesses and government buildings.

The scope of works consists of:

- Reconstruction of wharf pavement.
- Rehabilitation of existing seawall; and
- Renovation of the existing Warehouse

### 2.1.1 Design Solution

#### Reconstruction of wharf pavement - excavation and reconstruction of existing pavement material

Figure 1 highlights the site plan for the port works and the area of impact (dashed line). The final design for Funafuti port will consist of a concrete pavement improvement for the existing container area (approximately 6,000m<sup>2</sup>), with no expansion of the size (Figure 1, red shaded area). It is expected that existing work shed/shelters will be demolished as part of the upgrade work, and a concrete wash bay will be constructed (PT No. 20-24) with a drainage pit connected to a stormwater outfall to the lagoon foreshore. Reconstruction of the wharf pavement will involve excavations of approximately 700mm deep, backfill and compaction of subgrade and basecourse, and the installation of sand bedding and block pavers. Stormwater structures, pipes and channels will be constructed and installed (e.g., three main stormwater pipes

with outfalls oceanside, one from the warehouse access ramp, and other pipes with outfalls at PT No. 12-14, 19, 23 and 24 lagoon-side).

#### Rehabilitation of existing seawall

A new retaining sea wall will be an extension of the existing seawall that will be excavated, constructed, and backfilled between PT No. 11-14 and 19-24 (Figure 1). The new retaining sea wall will be closer to the lagoon from the existing wall by 7.4m at the north end of the wharf, and 2.9m on the south end, at a total length of 85m. The finished height level of the new retaining seawall is dependent on the existing seawall – a 1%-2% fall is required. The dimensions of the total seawall are: 85m long, 400mm (h) x 2700mm (w) footing, and 2000mm (h) x 200mm (w) wall. The scope of works includes the excavation for the new retaining wall base, construction of the concrete retaining wall, and backfill between the existing wall and the new wall. The soil conditions have been determined through geotechnical investigation, and a suitable foundation design has been developed as part of the technical design. Formwork will be installed to shape the concrete, and reinforced (typically with steel) for added strength. The concrete will be poured and cured for both durability and aesthetics and integrated with the wharf pavement and drainage system to ensure structural coherence. Once construction commences, works will be planned around the tide timing and levels to suit and will include sediment monitoring, control, and protection of the marine ecosystem to minimize negative impacts.

#### Renovation of Existing Warehouse

The warehouse renovations will involve retrofitting openings, closing existing openings and improvements to the existing Solar Power infrastructure on the roof along with an improved loading area to new the concrete loading bay associate with the wharf pavement work.

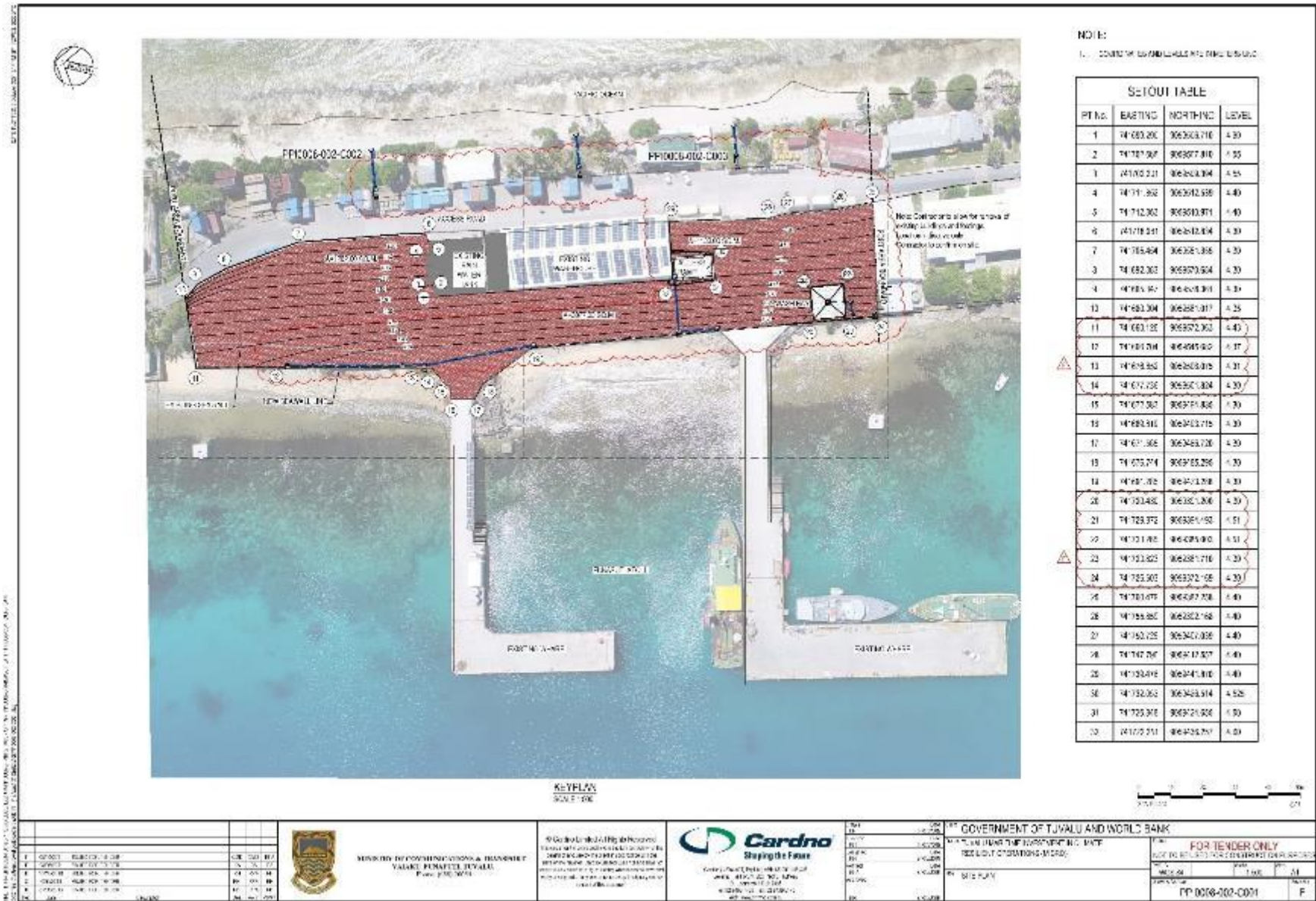


Figure 1: Site plan for the Funafuti port work improvement and area of impact (dashed line).

## 2.1.2 Ancillary Sites

### 2.1.2.1 Workers Accommodation on Funafuti

At this stage in project preparation, it is not known how many foreign workers will be required for the Funafuti Port works. The Contractor will be expected to maximise use of local labour to minimise the need for foreign workers. The Contractor for the Funafuti works is required to utilise the Funafuti Labour Registry in Appendix F. It is not anticipated that a worker's camp will be needed on Funafuti and workers will be able to use existing accommodations, particularly if the Contractor employs local labour as a priority.

### 2.1.2.2 Laydown and Stockpile Sites Funafuti

Aggregates are expected to be shipped in multiple shipments (up to three) in shipping containers, which the port is well-equipped to store and manage. There will be sufficient space within the port, on MTET leased land, to accommodate all lay down and stockpiling needs. Given the material would be arriving at the port and not leaving the precinct, off-site impacts associated with its transport and storage would likely be minimal and readily managed, e.g., construction noise, vibration, and air emissions.

## 2.2 Program of Works

It is expected that the Funafuti works will commence early 2024 and end later the same year. For Funafuti Port, while it is preferable to undertake works outside cyclone season. The contractor will be required to sequence works so as to ensure minimal impacts.

## 3 Consents and Permitting

A full review of relevant legislation and international conventions can be referred to in the MICRO ESIA.

### 3.1 Development Consents

Please be advised that to proceed with this project, a Development Consent must be obtained under the Environmental Protection Act. The process for conducting Environmental Impact Assessments is outlined in the Environment Protections (Environmental Impact Assessment) Amendment Regulation 2018. To comply with this regulation, a preliminary environmental assessment report and an environmental management plan must be submitted for all developments. The EIA will be monitored by the EIA officer, and it will be the responsibility of the proponent to implement the environment management plan. The regulations specify the required content of an EIA under GoTv law, and the MICRO ESIA and ESMP have been developed in accordance with these requirements. The expectation is that the Project will be screened as a Category B project. In summary, the regulations stipulate that an environmental management plan must include:

- a) mitigation measures that;
  - i. identify any significant environmental impact that cannot be avoided;
  - ii. identify appropriate mitigation measures to minimise any significant environmental impacts arising from the preferred alternative;
  - iii. recommend any proposed conditions
- b) Reporting requirements;
- c) Capacity building and training;
- d) Performance indicators;
- e) Implementation schedule;
- f) Cost estimates;
- g) Actions and procedures for responding to environmental or social emergencies arising from the development; and
- h) An environmental and social mitigation and monitoring plan

In addition to these requirements listed under Regulation 12, an assessment of baseline conditions and a schedule of compliance monitoring will be included in the EIA. The Regulations also make provision for the DoE to identify and use a suitably skilled and qualified external consultant to support the DoE the review process at the cost of the project proponent. The Regulations state that after review of the assessment, the DoE may issue instructions for the proponent to undertake consultations and may provide full details for the proposed consultations process, as well as the feedback on whether the project should commence or not.

### 3.2 World Bank Operational Policies

The following ESF policies relevant to this Project, required the client to prepare the ESIA and ESMP to address all requirements of these policies. OP4.01 Environmental Assessment, OP4.04 Natural Habitats,

and OP4.12 Involuntary Resettlement were relevant; however, OP4.12 is not triggered but is appropriate to be considered to ensure that any potential changes to the Project are assessed against this policy and should it be triggered.

- **World Bank Operational Policy 4.01 – *Environmental Assessment***  
The WB requires an Environmental Assessment of Projects proposed for WB financing to help ensure that they are environmentally sound and sustainable, and thereby, improve decision-making. OP 4.01 requires (i) detailed qualitative and quantitative analysis to determine project impacts, (ii) determination of tangible measures to prevent, minimise, mitigate or compensate for those adverse impacts, (iii) public consultation and disclosure as part of the EA process and (iv) requires and Environmental Management Plan (EMP) to address set mitigation along with monitoring and institutional measures to be taken during design, implementation, operation and maintenance phases of the project.
- **World Bank Operational Policy 4.04 – *Natural Habitats***  
This policy requires the conservation of natural habitats and specifically prohibits the support of projects that involve significant conversion or degradation of critical habitats, as defined by the policy. The policy further requires the EA to identify impacts on biodiversity and species and to determine endemism, endangered species and to determine project impacts on these species and to propose acceptable mitigation and monitoring measures.
- **World Bank Operational Policy 4.12 – *Involuntary Resettlement (not triggered)***  
This policy does not cover only physical relocation but any loss of income sources resulting in: (i) relocation or loss of shelter; (ii) loss of assets or means of livelihood; (iii) loss of income sources or means of subsistence, whether or not the affected people must move to another location. This policy also applies to the involuntary restriction of access to legally designated parks and protected areas, resulting in adverse impacts on the livelihood of the displaced persons. MICRO will not be acquiring land, limiting access to resources or assets and will involve no relocation.

### 3.3 National Labour Legislation

#### 3.3.1 Constitution of Tuvalu

The Constitution of Tuvalu was adopted in 2008 and contains several relevant articles. It includes a Bill of Rights which, among other things, guarantees protection from slavery and forced labour, protection of freedom of assembly and association, and freedom from discrimination on the grounds of race, place of origin, political opinion, colour, religious beliefs, or lack of religious beliefs, (without reference to gender, sexual orientation, disability, or age).

#### 3.3.2 Employment Act 2008

This Act is Tuvalu's main piece of labour legislation. Consistent with ESS2, it sets out various minimum terms and conditions of employment under Tuvaluan law, including relating to days and hours of work, rest periods, overtime, and termination. The Employment Act also prohibits forced labour and the employment of children under the age of 15 years' old for light duties or 18 years old for hazardous work.

#### 3.3.3 Labour and Employment Relations Act 2017

This Act is made up 13 Parts and 6 out of these Parts are worth consideration by the MICRO 2 PMU and the CPMO. This is due mainly to its application which is to all employers and employees in all workplaces in Tuvalu Section 4 (1). Relevant to this project are: (i) employment relationship including detailed terms and conditions of employment for the worker (Part 2), (ii) employment of young persons including minimum ages (Part 3), (iii) prohibition of the worst forms of child labour and forced labour (Part 4), (iv) equal employment opportunities and non-discrimination (Part 5), (v) occupational safety and health (Part 6) including employer and employee responsibilities, and (vi) settlement of disputes (Part 9).

#### 3.3.4 Trade Unions Act 1946

This Act allows for the formation of registered Trade Unions with 7 or more members. It also set the financial accounting requirements of Trade Unions so that accounts may be audited. The Act provides for

workers being able to unionise without hindrance, subject to the union being registered and compliant with the articles of the act. The act also provides for workers to participate in peaceful pickets.

### 3.4 Transition to Environmental and Social Framework Requirements

As MICRO project is co-financed by MICRO 2 (P177100), the project now adheres to the ESF requirements outlined in the Environmental and Social Framework (ESF). The pertinent Environmental and Social Standards corresponding to the replaced Operational Policies (OPs) are Environmental and Social Standard (ESS) 1 - Assessment and Management of Environmental and Social Risks and Impacts and Environmental and Social Standard (ESS) 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources.

ESS 1 places a focus on evaluating and managing environmental and social risks and impacts. It necessitates a methodical approach in identifying, assessing, and managing potential adverse impacts, mirroring the requirements of OP 4.01. The ESS1 also underscores the significance of public consultation, disclosure, and, in the context of this project, the formulation of an Environmental and Social Impact Assessment (ESIA), which ESIA was completed in 2018<sup>4</sup> and aligns with the ESMP.

ESS 6 focuses on the conservation and sustainable management of biodiversity and natural resources. It aims to prevent and mitigate adverse impacts on ecosystems, habitats, and species. ESS 6 aligns with the objectives of OP 4.04 by emphasizing the importance of avoiding significant conversion or degradation of critical habitats and conducting an assessment of impacts on biodiversity, as discussed in the 2018 ESIA. The impact on biodiversity is deemed. However, as the aggregate for the construction activities will be imported, it poses a biodiversity risk due to invasive species. As such, an invasive species management plan shall be prepared and implemented, and in accordance with national regulations.

The Environmental and Social Standard (ESS) 5 - Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement, which serves as the ESF equivalent of OP 4.12, has not been triggered in the course of this project.

Other relevant ESF standards include:

ESS 2: Labour and Working Conditions - Workers involved in the project will include direct and contracted workers. Direct workers will include employees and consultants of the Project Management Unit. Contracted workers will be engaged through key consulting firms or construction contractors. The preparation of a Labour Management Procedure (LMP) will include appropriate terms and conditions of employment, non-discrimination and equal opportunity, workers organisations, restrictions on child and forced labour, and OHS in design, construction, and operational phases. The contractor shall follow the LMP prepared for the MICRO 2 project.

ESS 3: Resource Efficiency and Pollution Prevention – The project designs should result in the efficient consumption of resources such as construction materials or energy, completion of activities such as dredging in low-risk areas, mitigation measures to contain and remediate hydrocarbon spills during construction and operations, and proper management of run-off, greywater, and sewage.

ESS 4: Community Health and Safety – as described in the Labour Management Procedure (LMP), Community health and safety is to be managed during the construction and operational phase. Construction activities can pose a risk to community members through increased noise, dust and traffic and the incorrect disposal of waste, including hazardous materials.

ESS 8: Cultural Heritage – The project will require “chance finds” procedures will address any unknown tangible cultural heritage (e.g., movable or immovable objects, archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. The project shall follow the Chance Finds Procedures for MICRO 2.

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<sup>4</sup> The Funafuti port ESIA was completed in 2018 as part of the Maritime Investment for Climate Resilient Operations - Environmental and Social Impact Assessment: Nanumaga Harbour and Funafuti Port.

ESS 10: Stakeholder Engagement and Information Disclosure – A Stakeholder Engagement Plan (SEP) will be developed in a manner that is acceptable and culturally appropriate, considering any specific needs of groups that may be disproportionately affected by the project. The SEP will outline a structured approach for community outreach and two-way engagement with stakeholders, in appropriate languages, and adopting measures to include vulnerable and disadvantaged groups and will be based on meaningful consultations with communities, community-based organisations and religious groups. The SEP should include non-discrimination provisions to protect disadvantaged or vulnerable individuals or groups, and to allow them to access the benefits of the project. The project will be assisted by the PMU, CPMO and the World Bank to consider, mitigate, and manage potential impacts on such individuals and groups. Similarly, as with the LMP and Chance Finds Procedures, the project will follow the SEP as prepared for MICRO 2.

The impact and mitigation measures for ESS 1- 4, 6, 8, and 10 should be reflective in the Contractor's ESMP (C-ESMP).

## 4 Potential Impacts and Mitigations

A summary of the potential impacts and mitigations of the Funafuti Port work is outlined as follows.

### Reconstruction of Wharf Pavement:

#### Impacts:

- Excavation and reconstruction activities may lead to dust generation, noise, and disruption to the existing site.
- Demolition of work sheds/shelters may result in temporary displacement of activities and potential waste generation.
- Construction activities could impact the surrounding environment and water quality, especially during stormwater runoff.
- Excavation activities may lead to soil erosion, especially in areas with exposed soil, contributing to sedimentation and runoff.
- Excavation activities will disrupt the flow of goods and people from the port.

#### Mitigation Measures:

- Implement dust control measures, such as water spraying or dust suppressants, to minimize airborne particles.
- Schedule construction activities to minimize noise during sensitive hours or in nearby residential areas.
- Implement waste management plans (hazardous, solid, wastewater) for the management and sediment catchment, disposal of construction waste in accordance with good international industry practices, and use of own freshwater supply (rain harvesting or desalination) so not to impact the area groundwater supply.
- Utilize sediment and erosion control measures, such as silt fences, sediment ponds, and stabilizing exposed surfaces, to prevent soil erosion during and after excavation.
- Implement a suitable traffic management plan for the effective flow of people and goods from the port.

#### rehabilitation of existing seawall Impacts:

- Excavation and construction activities may disturb the marine environment.
- Installation of the new retaining sea wall may alter the coastal landscape and affect the marine ecosystem.



- Excavation near the coastline may result in increased erosion along the shoreline, impacting sediment transport.

Mitigation Measures:

- Implement measures to minimize sediment runoff into the water during excavation.
- Utilize eco-friendly construction materials to reduce the environmental impact.
- Implement a water (quality) management plan to protect the ground water resources and monitor sediment plumes with corrective actions.
- Use erosion control measures, such as natural barriers or geotextiles, to protect against shoreline erosion during construction.

Renovation of Existing Warehouse:

Impacts:

- Retrofitting openings and closing existing openings may cause temporary disruption to warehouse operations.
- Construction activities could generate noise and dust, affecting the immediate surroundings.
- Changes to the Solar Power infrastructure may require careful handling to avoid environmental impact.
- Construction activities may disturb soil, potentially leading to erosion and increased runoff.
- Construction activities will disrupt the flow of goods and people from the port.

Mitigation Measures:

- Schedule renovations to minimize disruptions to warehouse activities.
- Implement noise control measures during construction, such as sound barriers or scheduling noisy activities during non-business hours.
- Ensure proper handling and disposal of materials during Solar Power infrastructure improvements.
- Incorporate erosion control measures, like vegetative cover or mulching, to stabilize soil during and after renovation activities.
- Implement proper stormwater management practices to control runoff and reduce the risk of sedimentation.
- Implement a suitable traffic management plan for the effective flow of people and goods from the port.

The Funafuti Port impacts are characterized as site-specific, temporary, and reversible, primarily occurring during the construction stage. Implementing the ESMP mitigation measures will help minimize the construction and operational impacts. No further studies are anticipated associated with excavation and new retaining seawall construction.

Considering the applicable ESF standards, along with the outcomes of the ESIA, the impact table for the Funafuti Port Improvement is outlined below. The retention of project phase titles and the potential impact sequence numbers aims to facilitate seamless cross-referencing with the ESIA document (2018).

			Impacts to Natural Environment							
Project Phase	Project Activity/Location	Potential Impact	Relevant ESS	Magnitude	Duration	Extent	Likelihood	Impact Rating	Mitigations/Notes	Post-Mitigation Residual Impact
1. Water Resources (ground water, surface water, freshwater)			ESS 1 – 3 & 10							
Construction	Worker's accommodation and Concrete Production	1-3 Use of existing freshwater resources will place added demand on limited supply potentially leading to shortages in time of drought.		High	Short Term	Local	High	Major Negative	Contractor to provide for their own freshwater needs (additional rainwater harvesting installed prior to commencement of works, or portable desalinisation plant to be used)	Moderate Negative
	Concrete Production	1-4 Increase in pH of groundwater from caustic concrete slurry and process water contamination		Low	Short Term	Limited	Medium	Minor Negative	Concrete production is to be equipped with settlement tank/pond for treatment of slurry and process water. Treatment shall include settling of suspended solids and decreasing pH of water. Waste concrete should be allowed to harden before disposal.	Negligible
	Machinery Use	1-5 Contamination of ground and surface water with hydrocarbons (fuels and oils) resulting from leaks, drips, or spills.		Medium	Short Term	Local	High	Minor Negative	All machinery to be in good working order and well services. All washdown of machinery to occur within containment system. All refuelling to be done over fit-for-purpose drip trays. Spill kits to be readily available and workers trained in their use.	Negligible
2. Geological Resources (construction aggregates, sand, soils)			ESS 1 – 3 & 10							
Construction	Dredging	2-3 Removal of aggregate from the island system in the form of reef flat substrate		Low	Long Term	Limited	Certain	Minor Negative	Carefully managed dredging activities to ensure no 'over dredging' occurs	Minor Negative
	Machinery Use	2-5 Contamination of soils and sand with hydrocarbons (fuels and oils) resulting from leaks, drips, or spills.		Medium	Short Term	Local	High	Minor Negative	All machinery to be in good working order and well services. All washdown of machinery to occur within containment system. All refuelling to be done over fit-for-purpose drip trays. Spill kits to be readily available and workers trained in their use.	Negligible
	Materials Sourcing	2-7 Extraction of sand for use as an aggregate in concrete production (or any other use) in a coastal environment which has a limited sand budget could result in erosion and destabilisation of vegetation line. Reduction in		High	Long Term	Regional	Medium	Moderate Negative	No sand will be removed from the beach for any aggregate use or any other Project use. Any aggregate in addition to the dredged material will be imported.	None

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		resilience to climate change and storm events.								
3. Coastal Hydrodynamics (waves, current, longshore transport, erosion, accretion)			ESS 1 – 3 & 10		(No significant change anticipated as impacts would be negligible and manageable based on the existing conditions and situation of the current sea wall. Also see 6. Marine Environment below.)					
4. Atmospheric Environment (air quality)			ESS 1 – 3 & 10							
Construction	Stockpiles, Laydown Site and Haulage Routes	4-1 Airborne dust particles likely to be generated at dredged spoils stockpiles, during aggregate haulage and at laydown sites.		Low	Short Term	Local	Medium	Minor Negative	Aggregates should be covered during haulage and all haulage vehicles must travel at a low speed to minimise dust generated.	Minor Negative
	Machinery Use	4-2 Emissions from heavy machinery and trucks can lead to reduction of air quality.		Low	Short Term	Local	Medium	Minor Negative	All machinery to be in good working order and well serviced.	Minor Negative
5. Acoustic Environment			ESS 1 – 3 & 10							
Construction	Machinery Use	5-1 Noise at all locations of heavy machinery close to sensitive receptors such as the church, clinic, and schools.		Low	Short Term	Limited	High	Minor Negative	Contractors will work with community to ensure that heavy machinery is not used near sensitive receptors during critical times such as church services or school tests.	Minor Negative
	Haulage	5-2 Noise from trucks along haulage route		Low	Short Term	Local	Medium	Minor Negative	Trucks will operate during normal working hours only and will drive at low speeds	Minor Negative
	Workers	5-4 Loud and antisocial behaviour at accommodations and within the community outside of normal working hours.		Medium	Short Term	Local	Medium	Moderate Negative	All workers will receive training and be required to sign a code of conduct stating that behaviour must be respectful and appropriate always. Worker code of conduct	Moderate Negative
6. Marine Environment			ESS 1 – 3 & 10							
Funafuti Port		6-2 Impact on rocky beach and seawater quality at the northern end of the port from construction and operational phase.		Medium	Long Term	Limited	Medium	Moderate Negative	Design of Funafuti port should ensure that northern cargo holding area is provided with a retaining wall or solid barrier between the paved area and beach.	Minor Negative
		6-3 Reduction in sea water quality (sedimentation, hydrocarbons, solid waste, etc) from increased surface water run off resulting from paved surface.		Medium	Long Term	Local	High	Moderate Negative	Pavement design to consider surface water drainage management including bunding for hazardous substances storage.	Minor Negative

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Construction	Machinery Use	6-4 Hydrocarbon spill in marine environment from project vessels		Low	Short Term	Limited	Low	Minor Negative	All vessels to be equipped with spill kit including oil booms and absorbent pads. All staff to be trained on use of spill kits and kits to be stored in easily accessible locations	Minor Negative
	Wastewater Management (concrete process water, washdown water, septic systems, etc)	6-13 Uncontrolled and untreated wastewater from all project activities have the potential to increase the nutrient loading on the marine environment leading to algal blooms and potentially leading to loss of live coral cover.		Medium	Intermittent	Local	Medium	Moderate Negative	All wastewater streams will be subject to strict controls to ensure 100% capture and/or containment for treatment. Treatment will vary depending on type of wastewater.	Minor Negative
	Surface Preparation & Laying Funafuti	6-14 During the surface preparation at Funafuti Port, it is possible for spilled hydrocarbons and sediments to enter the adjacent ocean from rainwater runoff.		Medium	Short Term	Local	Medium	Moderate Negative	During preparation works diversions and bunding shall be used to divert run off away from coastal environment and towards settling and treatment ponds.	Minor Negative
<b>7. Terrestrial Environment (flora &amp; fauna)</b>			<b>ESS 1, 6 &amp; 10</b>							
	Materials Sourcing	7-4 Introduction of non-native or invasive plant, pest or bacterial species from untreated aggregates would pose a threat to the plant and animal species in Tuvalu.		Medium	Long Term	Regional	Medium	Major Negative	All imported aggregates, materials and equipment will be treated for contaminants prior to departure from originating country and will be imported into Tuvalu under national quarantine law.	Minor Negative
	Concrete Production	7-6 Wastewater and slurry from concrete production is caustic and will lead to vegetation die off if they come into contact.		Low	Short Term	Limited	Low	Minor Negative	Concrete production is to be equipped with settlement tank/pond for treatment of slurry and process water. Treatment shall include settling of suspended solids and decreasing pH of water. Waste concrete should be allowed to harden before disposal.	Minor Negative

**Impacts on Human and Built Environment**

Project Phase	Project Activity/Location	Potential Impact	Relevant ESS	Magnitude	Duration	Extent	Likelihood	Impact Rating	Mitigations/Notes	Post-Mitigation Residual Impact
8. Community Services and Infrastructure (transport network, harbours, utilities, waste disposal)			<b>ESS 1- 3 &amp; 10</b>							
Construction	General	8-1 Increase in volume of traffic on the island roads		Medium	Short Term	Local	Certain	Moderate Negative	Contractor will develop a Traffic Management Plan to ensure that all vehicles are driven in a controlled manner at suitable speeds and within normal working hours only	Minor Negative
	Solid Waste Generation	8-3 Project works will generate quantities of solid waste in several different forms and from most project activities. The municipal landfill on Funafuti is already overburdened with the waste generated on the island. Any addition waste from infrastructure projects has the potential to create a visual and environmental nuisance and cause pollution in the marine environment		High	Long Term	Local	Certain	Major Negative	The Contractors Solid Waste Management Plan will stipulate the policy of reduce, reuse, recycle wherever possible. Organic biodegradable will be shredded at the Department of Waste Management facilities. Reusable clean fill, rubble or excess aggregates will be made available to the PWD or Kaupule for community use. All non-reusable, non-recyclable and non-organic solid waste will be disposed of outside Tuvalu in licensed landfills of suitable size and capacity to handle infrastructure project waste.	Minor Negative
9. Land Resource Use (Government, Communal and Private)			<b>ESS 5</b>	(No impact)						
10. Social Environment (Heritage, Culture, Tradition, Opportunity)			<b>ESS 1, 2, 8 &amp; 10</b>							
Construction	Influx of Labour	10-1 Presence of workers living on the island can lead to increased risk of social conflict, inappropriate or illicit behaviour and have negative impacts on community dynamic		Medium	Intermittent	Local	High	Moderate Negative	Placement of workers camp to be determined during design phase in consultation with the community and management of workers behaviour to be subject to Worker Management Plan. Provide workers with dedicated recreational facilities.	Minor Negative
	Direct Income Generation	10-3 Increase opportunity for income generation from food, beverage, and housekeeping services and in construction or project administration roles		High	Short Term	Local	Certain	Major Positive	Contractor will be required to use local community members to undertake cooking and housekeeping services.	Major Positive
		10-4 Increase in individual income through project employment can lead to instances of increased drinking and/ increased conflicts within the family home which may lead to increases in instances of GBV		Medium	Intermittent	Regional	Low	Minor Negative	All project workers will be required to undertake training by approved service provider and sign codes of conduct. Disciplinary action will be appropriate for all instances of GBV	Minor Negative
	General	10-5 Increase opportunity for up-skilling within the local workforce if they are employed in skilled rolls.		Medium	Long Term	Local	High	Major Positive	If used for skilled positions, then increased capacity within the work force will have long term benefits for the labour force of Tuvalu. It should be noted that the number of local employees is not likely to be high	Major Positive



## 5 Stakeholder Engagement

As MICRO is co-financed by MICRO 2 (P177100), the Stakeholder Engagement Plan (SEP) for that project also applies to MICRO. As such, in implementing this plan, a gap analysis of stakeholder engagement activities proposed in this section and those proposed in in MICRO 2 SEP is required by responsible parties. Whichever is more substantive and inclusive should be implemented where there are any divergences. A brief synopsis of the SEP follows.

Stakeholders will require engagement on the MICRO Project for the Funafuti works. The MICRO ESIA identified the relevant stakeholder groups, and extensive community consultations with the Kaupule and local community was carried out during the project planning and concept design phase. Full minutes of these consultations can be found in the ESIA. Stakeholder engagement activities will start as early as possible and be ongoing throughout the life of the project.

The nature and frequency of follow-up consultations will be different depending on the subprojects. Before the implementation phase of MICRO 2, all affected parties will be informed about the project scope and be provided with contact details for the PMU and details of how they can request further information. They also will be informed of the various ways in which they can access public project information such as through a project website, at the Kaupule office for disclosed reports, the PMU office in Funafuti and through the WB project website updates.

The key communication principles are to:

- Keep the communities and key stakeholders informed in advance of the project progress.
- Encourage community participation.
- Ensure 'no surprises' to key stakeholders and the community.
- Listen to feedback, investigate suggestions, and adopt them where possible.
- Do no harm, particularly when engaging with women and other vulnerable groups.

### 5.1 Purpose and Timing of Stakeholder Engagement Program

The SEP is designed to establish an effective platform for productive interaction with the potential affected parties and others with interest in the implementation outcome of the MICRO 2 activities.

The objectives of engaging stakeholders during the development and implementation of MICRO 2 include the following:

- **Ensuring understanding:** An open, inclusive, and transparent process of culturally appropriate engagement and communication to ensure that stakeholders are well informed about the proposed. Therefore, whenever information is disseminated, Tuvaluan translations will be used of key summaries to ensure full understanding of communication.
- **Involving stakeholders in the assessment:** Stakeholders will be included in the scoping of issues, the assessment of impacts, the generation of mitigation and management measures and the finalization of the ESIA reports. They will also play an important role in providing local knowledge and information for the baseline to inform the impact assessment.
- **Building relationships:** Through supporting open dialogue, engagement will help establish and maintain a productive relationship between the ESIA team and stakeholders.
- **Engaging vulnerable groups:** An open and inclusive approach to consultation increases the opportunity of stakeholders to provide comments on the proposed Project, and to voice their concerns. Some stakeholders, however, need special attention in such a process due to their vulnerability. Special measures, such a women-only consultations and specific consultations with vulnerable groups will be considered to ensure that the perspectives of vulnerable stakeholders are heard and considered.
- **Managing expectations:** It is important to ensure that the proposed project does not create or allow unrealistic expectations to develop amongst stakeholders about proposed project benefits. The engagement process will serve as a mechanism for understanding and managing stakeholder and

community expectations, where the latter will be achieved by disseminating accurate information in an accessible way.

- **Ensuring compliance:** The process is designed to ensure compliance with both local regulatory requirements and international best practice.

This will be achieved through:

- Beginning early in the project planning process to gather initial views on the project proposal and inform project design.
- Supporting active and inclusive engagement
- Ensuring prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language and is understandable to stakeholders,
- Considering and responding to feedback,
- Addressing project grievances.

Adequate stakeholder consultation will require timing and advance planning. To ensure information is readily accessible to affected stakeholders, and adequate representation and participation of the different groups in the process, MICRO 2 will adopt different methods and techniques based on an assessment of stakeholder needs. Methods for engagement are given in the Table 1 below.

There are a variety of engagement techniques used to build relationships with stakeholders, gather information from stakeholders, consult with stakeholders, and disseminate project information to stakeholders.

When selecting an appropriate consultation technique, culturally appropriate consultation methods, and the purpose for engaging with a stakeholder group should be considered.

Table 1 presents the suggested mediums for engaging with stakeholders as part of the implementation plan components for SEP activities. As the needs of various stakeholders differ at different stages of the project, a broad range of communication methods and mediums are recommended. These communication methods have been used before for the previous MICRO project activities.

*Table 1. Engagement Mediums*

Medium	Description
<b>Stakeholder Meetings and capacity building</b>	
Focus Group Meetings	The aim of a focus group is to pull together stakeholders with the same interest into a single meeting to discuss issues. Meetings usually have a very specific objective which is aligned with the expectations and interest of the stakeholders' present. This method also includes meetings with government departments and private sector stakeholders with professional responsibilities as well as key civil representative who represent the voice of women and other vulnerable groups. Meeting with women and other vulnerable groups will be done separately to create a safe and more conducive environment for effective consultation.
Consultations with the Falekaupule	These consultations are focused to identify and discuss stakeholder concerns or to provide feedback using detailed information. These consultations should, wherever feasible, be held on the islands, however due to fluctuating levels of access to the outer islands related to COVID-19 restrictions, face-to-face consultations with Falekaupule members visiting or based in Funafuti, who have will be combined with phone calls to island leaders situated on the islands. It is also notes that women are not always equal participants in Falekaupule spaces, as such where women are not involved and able to participate openly and equally in the consultation, separate consultations will be sought with women's representatives.
Community based consultations	These consultations are focused to identify and discuss stakeholder concerns or to provide feedback using detailed information. These consultations should, wherever feasible, be held within the community environment with female-only consultations and specific consultations with vulnerable groups. Consultations with women and vulnerable groups will not seek to ask them directly about experienced of stigma, discrimination, or



	<p>violence but to assess issues more generally to enable the development of effective risk mitigation and response strategies.</p> <p>Combined face-to-face &amp; remote communications: Due to fluctuating levels of access to the outer islands related to COVID-19 restrictions, face-to-face consultations with island communities based in Funafuti, who have detailed local knowledge, will be combined with phone calls to island leaders situated on the islands.</p>
<b>Written / visual communications</b>	
Project Information Bulletin	This needs to be a short and concise document providing jargon-free information describing the project actions, the potential social and environmental impacts, the need for the project and the contact details for the project team, including contacts for complaints relating to SEA /SH.
Notice boards	Notice boards (community and work site entrances) are a good tool to use for communication of up-to-date project information such as timing and duration of works, upcoming consultations, project progress and other relevant project information, including contacts for complaints relating to SEA /SH..
Letters	Formal method of communication usually intended to convey very specific messages. Alternatively, it is used as a formal method for request of information.
Emails	Using emails for in-country stakeholders can pose a challenge because of limited internet access due to insufficient telecommunications and/or supporting IT infrastructure. NGOs and most of the Government Ministries do have access to email which can be utilised for communications but arranging of formal community consultations is best arranged through other methods of communication.
<b>Media</b>	
Radio	In Tuvalu, radio is the primary medium for raising awareness and prepare stakeholders for larger events or refined communication to take place. Radio will be an effective communication tool to circulate information of rights related to SEA/SH and processes to make complaints relating to SEA /SH.
<b>Other</b>	
PMU	PMUs will be the ‘familiar faces’ of the project and will, for many stakeholders at the community level, represent the most direct channel to the project. For this reason, they will be trained specifically to ensure that they can receive contacts for complaints relating to SEA /SH while upholding a survivor-centred approach.
	Combined face-to-face & remote communications: Due to fluctuating levels of access to the outer islands related to COVID-19 restrictions, face-to-face consultations with the island communities based in Funafuti, who have detailed local knowledge, will be combined with phone calls to island leaders situated on the islands.
Telephone	Use of the telephone / mobile phone is still regarded as the preferred method for communication because of accessibility and speed. Having a discussion over a phone in order to ensure mutual understanding between two parties is quicker and easier compared to sending an email, waiting for reply.

## 5.2 SEP Implementation Plan and for Information disclosure

The project will ensure that the different activities for stakeholder engagement, including information disclosure, are inclusive and culturally sensitive. Measures will also be taken to ensure that the vulnerable groups will have meaningful opportunities to participate in and benefit from project activities.

Table 2 (below) sets out the implementation plan for stakeholder engagements and community consultations. The plan is for the lifecycle of the project and constitutes the following components:

**Activity:** the various operational consultation activities that will be undertaken as part of the SEP

**Objective:** the target that each activity needs to reach

**Stakeholder:** the various stakeholders to be targeted during implementation of the SEP activity

**Responsibility:** who will lead this activity

**Medium:** the method by which the engagement or consultation will be done. This includes disclosure whereby information will be disclosed locally on a website or responsible parties will ensure documentation is available in a relevant location in Funafuti.

### 5.3 Public Consultations to Date

A series of public consultations and stakeholder meetings were held during the development of the MICRO ESIA with the aim of providing meaningful consultation with stakeholder groups and to give an opportunity for all parties to provide input into the Project. The meetings target three groups of stakeholders: (a) Government agencies, authorities, and development partners in Funafuti; (b) NGOs and civil society groups; (c) the community members.

The consultation for the various groups took place according to the following schedule:

Information gathered during the consultation process on the social, economic, or environmental situation of Funafuti have been included in the baseline description in the ESIA. Wherever possible, the remaining concerns have been addressed either through design solutions or mitigation measures and included in this document.

### 5.4 Stakeholder Engagement and Consultation Plan

The Stakeholder Engagement and Consultation Plan (SECP), for the MICRO Project lifecycle constitutes the following components (Table 2):

**Activity:** the various operational consultation activities that will be undertaken as part of the SECP

**Objective:** the target that each activity needs to reach

**Stakeholder:** the various stakeholders to be targeted during implementation of the SECP activity; and

**Medium:** the method by which the engagement or consultation will be done

As the project develops, this SECP and implementation plan shall be updated by the PMU ESF Specialist to reflect the current project status and timeframes. In practice, the PMU will notify relevant stakeholders, at least 7 days prior to stakeholder consultations. Updates of project activities will be presented at this time as outlined in the SECP.

Table 2. implementation plan for stakeholder engagements

No	MICRO Project Activity	Timetable	Objective	Stakeholders	Medium
<b>A: Physical Investments (Funafuti Ports Road)</b>					
A1	Feasibility, decision on the sites / technologies and preliminary designs	From Project effectiveness through to tendering.	Bring stakeholders into the decision making around the site and type of investments. Discuss potential impacts and mitigation measures.	All identified	Stakeholder Consultations Focused group meetings Public meetings Emails and letters

A2	Disclosure of updates to the ESMP	Prior to tendering (ESIA) Prior to works starting (development of C-ESMP)	To disclose ESMP	All identified	Newspaper Website
			Advise stakeholders of final design, construction methods and updated mitigation and management plan.  Advise stakeholders of Gender Based Violence (GBV) prevention strategies and management of labour influx	Site occupants (State owned enterprises. Government agencies)  Site users (if different from above)	One-on-one meetings Stakeholder consultations Executive Summary
No	MICRO Project Activity	Timetable	Objective	Stakeholders	Medium
A3	Detailed design	Once Contractor is on board and prior to works starting	Keep stakeholders involved in any design updates.  Public announcements	Government agencies, site occupants, site users	Emails, One-on-one consultations Radio and websites Noticeboards
A5	Commencement of Works	Week before commencement of works.	To advise all stakeholders of commencement of civil works.	All identified stakeholders Site occupants (State owned enterprises. Government agencies)	Newspaper Email One on one meetings
			To reconfirm ongoing consultation, feedback and GBV/GRM processes	Site occupants (State owned enterprises. Government agencies)	Stakeholder workshops and consultations Website Marine Liaison Officer

Note the GRM for the project, which constitutes one of the consultation mechanisms, is in section 5.8.

All the public documents for MICRO 2 will remain in the public for the duration of the project. This SEP needs to be updated and refined throughout the lifecycle of the project. During this process, the focus and scope

of the SEP will change to ensure that the MPWIELMD addresses external changes and adheres to the objectives of this Plan.

### 5.5 Proposed Strategy to incorporate the view of vulnerable groups

The Project has and will carry out targeted stakeholder engagement with women and vulnerable groups to understand concerns/needs in terms of project design, operation and accessing information. The details of strategies to be adopted to effectively engage and communicate with women and members of vulnerable groups have been identified and will be implemented throughout MICRO 2 (see Table 1 in Section 3.3).

Focused efforts will be made to engage directly with the relevant stakeholders, including women and vulnerable groups at the local level. Affected individuals will be consulted directly or via their representatives.

In addition, special efforts will be made to meet with representatives of potentially vulnerable groups who may not be reached through established structures. All meetings will follow local practices and norms.

All affected stakeholders and groups will be made aware of the project feedback and grievance mechanism.

### 5.6 Future Phases of Projects

During the implementation of MICRO 2 there will be continuous meetings for the stakeholders and affected parties to keep them updated on the latest development of the project. Stakeholder consultations will be held at the various phases of the project (the preparation phase, construction, and operation phase). The engagement level will depend on the level of impacts of the project.

### 5.7 Resources and Responsibilities

The implementation of the SEP will be the overall responsibility of the MICRO PMU, with support from International ESF Specialist as required. Responsibilities are indicated in Table 2.

The PMU has a National ESF Specialist and is supported by an International and National ESF Specialist within the Tuvalu Central Project Management Office (CPMO). Together they will take the lead role in the implementation of the SEP, with support from the MICRO 2 Project Manager. The PMU will be responsible for arranging and facilitating the meetings as it appropriate with their in-depth knowledge of the natural, social, and traditional environments within Tuvalu. The PMU will also be the focal point for all stakeholder queries and contacts in relation to the implementation of the SEP or the GRM.

It is also the responsibility of the PMU to ensure that gender balance is achieved throughout the implementation of the SEP and the National ESF Specialist along with the MICRO 2 Project Manager will make culturally appropriate recommendations on strategies to achieve this such as separate meetings for males and females or targeting female input through women's groups.

All contractors in charge of carrying out specific project activities will also be required to implement the relevant provisions of the SEP, as indicated in Table 2. The grievance mechanism requirements will be laid out in the tender documentation.

### 5.8 Grievance Redress Mechanisms

#### 5.8.1 Definitions of Grievance

A grievance mechanism has been developed for potential use by external stakeholders including project affected people. The aim of the grievance mechanism is to achieve mutually agreed resolution of grievances raised by such stakeholders.

The main objective of a Grievance Redress Mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective, and lasting outcomes. It also builds trust and

cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of project;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoids the need to resort to judicial proceedings.

This GRM ensures that complaints and grievances (see 'definitions' below) are addressed in good faith and through a transparent and impartial process, but one which is culturally acceptable. It does not deal with 'concerns' which are defined as questions, requests for information, or perceptions not necessarily related to a specific impact or incident caused by a project activity. If not addressed to the satisfaction of the person or group raising the concern, then a concern may become a complaint. Concerns are not registered as a grievance but will be managed via through ongoing stakeholder engagement.

Key definitions are as follows:

- Complaint: an expression of dissatisfaction that is related to an impact caused by the project activities, which has affected (i) an individual or group adversely, (ii) the interests of an individual or group and who wants a proponent or operator (or contractor) to address and resolve it (e. g. problems related to dust deposition, noise or vibration). A complaint is normally of a less serious nature than a grievance; and
- Grievance: a claim raised by an individual or group whose livelihood, health and safety, cultural norms and heritage are considered to have been adversely affected (harmed) by a project activity which, if not addressed effectively, may pose a risk to project operations (through stakeholder actions such as access road blockages) and the livelihood, well-being or quality of life of the claimant(s).

This GRM sets out the following steps to be taken to resolve grievances, the role of different staff members involved and timeframes to reach a decision on grievances. The types of grievances stakeholders may raise include, but are not limited to:

- Negative impacts on communities, which may include, but not be limited to financial loss, physical harm and nuisance from construction or operational activities;
- Health and safety risks;
- Negative impacts on the environment; and
- Unacceptable behaviour by staff or employees. Project workers have a separate GRM under the MICRO 2 Labour Management Procedure that they can use to register grievances with their working conditions or similar.

A grievance redress mechanism (GRM) is presented below to uphold the project's social and environmental ESF performance. The purpose of the GRM is to record and address any complaints that may arise during the implementation phase of the project and/or any future operational issues that have the potential to be designed out during implementation phase. It should address concerns and complaints promptly and transparently with no impacts (cost, discrimination) for any reports made by project affected people (APs). The GRM works within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level.

The key objectives of the GRM are:

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

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

Labour Management Procedures (MICRO 2) under section 8 defines principles and processes for Workers Grievance Mechanism (WGRM).

The MICRO GRM process is described below.

### 5.8.2 Community Level Grievances

Community level grievances are most likely with the proposed investments. Issues related to the influx of labour, any disturbance from the workers accommodation, encroachment across land boundaries, noise, dust, and resource use should be expected and planned for.

Discussions with the Marine Department and the MICRO PMU have identified the following process which will be used to address the issues and concerns that an AP may have. The key point of contact for the AP will be the PMU, who will liaise directly with both the Contractor and the Supervision Engineer. The party receiving the complaint will receive and document all matters and issues of concern from the local community and forward copies of all grievances to the Contractor, Supervision Engineer, and PMU, which will operate under MPWIELMD.

Given the location of the project sites, the number of construction workers, it will be expected that there will be full and free access to the site-based Supervision Engineer to raise any issues of social concern as a result of the construction works. All efforts will be made to address any community or individual concerns in a timely and transparent manner and without retribution to the affected person to minimize any impacts that may affect project implementation.

For concerns such as damage to trees without permission or compensation, the AP will discuss this with the PMU, who will then raise the matter immediately with both the Contractor and the Supervision Engineer, if unresolved at the project site. If the concern can be addressed without delay, and the outcome is satisfactory to the AP, the matter is closed. The contractor will provide a report to the Supervision Engineer as soon as the complaint has been resolved.

For more extensive complaints such as damage to buildings or land issues such project/Contractor's encroachment on someone's land, the AP will make a formal written statement to be delivered to the PMU, who will forward this to the Contractor. The Contractor will document the complaint and forward a copy to the Supervision Engineer and MICRO PMU. The complaint must be acknowledged within 24 hours of the complaint being lodged. The timing and manner in which it will be resolved will be conveyed to the AP by the PMU within 48 hours. The contractor will provide a corrective action report to the Supervision Engineer as soon as the action has been taken.

If the complaint is not resolved by the Contractor or Supervision Engineer to the satisfaction of the AP, then the PMU will forward the complaint directly to MPWIELMD CEO, and with a copy to the Ministry of Home Affairs. The matter will be addressed with due consideration to the seriousness of the complaint and be carried out promptly. The MPWIELMD CEO will attend to the complaint within 24 hours and advise the PMU how it will be addressed. MPWIELMD CEO will decide within two weeks. The AP may, if so desired, discuss the complaint directly with the MICRO PMU or its representative at a mutually convenient time and location. If the complaint of the AP is dismissed, the AP will be informed of his/her rights in taking the complaint to the next step. However, every effort will be made to resolve the issue to the mutual satisfaction of both the parties.

Should this process not resolve the matter, then the AP may file a grievance on the World Bank website [www.worldbank.org/GRS](http://www.worldbank.org/GRS) or can take the grievance to the Tuvalu Judicial System. The filing of the grievance will be at the AP's cost, but if the court shows that PMU has been negligent in making their determination, the AP may seek costs.

Where issues caused by the project are raised and resolved through these existing community level GRM, it is important that these are captured by the MICRO PMU, which is responsible for recording all complaints/outcomes, and to help, as required for their resolution.

### 5.8.3 Overview: MICRO Project Grievance Redress Mechanism

The following GRM shall be put in place for all MICRO Project works to register, address, and resolve complaints and grievances raised by communities during implementation of project works. Contractors are required to adhere to this formal process.

Complaints may be submitted in person, via telephone, electronically, in letter, drop-box, or through a representative of the above community level process to the PMU. Complaints and grievances will adhere to this process and will be submitted (via recipient of complaint) directly via Grievance Complaints Logging System (GCLS) Facebook or email to project PMU. All complaints must be formally registered in the Projects complaint register. Should the complaint be received by the Contractor or Supervision Engineer directly, they will endeavour to resolve it immediately and submit notification of the complaints and resolution to PMU for entry into the complaints register or through the project GCLS Facebook. For all grievances across all the works, the PMU is responsible for ensuring that, on receipt of each complaint, the date, time, name and contact details of the complainant, and the nature of the complaint are recorded in the Complaints Register. Please note that the Complaints Register for all project related issues will be managed through the MICRO Project GCLS Facebook.

Should the complainant remain unsatisfied with the response of the Contractor, the complaint will be referred to the PMU Project Manager.

Specifically:

1. The PM will take earnest action to resolve complaints within two weeks or less. It would be desirable that the Affected Person(s) (AP) is consulted and be 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.
2. If the PM is unable to resolve the complaint to the satisfaction of the AP, the Project Manager will refer the matter to the MPWIELMD CEO, who will aim to resolve the grievance in three weeks or less. The Grievance focal point will log details of issue and resultant resolution status.
3. Should measures taken by the MPWIELMD CEO fail to satisfy the complainant, the aggrieved party is free to take his/her grievance to the Tuvaluan Court, and the Court's decision will be final.
4. Key stakeholders will be informed of the GRM through a public awareness campaign and discussion with the Marine Department. The Project shall also erect appropriate signage at all works sites with up-to-date project information and summarizing the GRM process, including contact details of the relevant Contact Person. Public information bulletins websites and other public information will also include this information. Anyone shall be able to lodge a complaint and the methods (forms, in person, telephone, forms written in Tuvaluan) should not inhibit the lodgement of any complaint.

The Complaints Register by the PMU Project Manager, who will log the: i) details and nature of the complaint ii) the complainant's name and their contact details iii) date iv) corrective actions taken in response to the complaint. This information will be included in MTET's progress reports to the Bank.

### 5.8.4 Tuvalu Judiciary Grievance Redress Mechanism

The project level process will not impede affected people's access to the Tuvalu legal system. At any time, the complainant may take the matter to the appropriate legal or judicial authority as per the laws of the Tuvalu, if an agreed resolution cannot be obtained through conciliation negotiation.

### 5.8.5 Grievance Documentation and Reporting

Resolved and escalated grievances/cases would be documented daily into the GRM System (which will likely be a simple spreadsheet) by the PMU. The PMU Project Manager would exercise oversight over the system and track resolution of all grievances/cases.

Monthly case/grievance reports will be generated to inform management decisions. Quarterly reports would also be generated and reported to the MPWIELMD as part of the Project's progress reporting to the World Bank.

## 6 Labour Management Procedures

The MICRO Funafuti Port works shall follow the LMP prepared for the MICRO 2 projects as mentioned earlier. The Project will ensure that all tender documents for Infrastructure include budget provisions for all OHS provisions as well as other costs associated with labour management (e.g., the operation of a grievance redress mechanism). The project will regularly monitor the contractor's performance in implementing OHS measures. Project's regular reporting system should include the project's performance on the OHS implementation.

Following ESS2 and national law, due to the hazardous work situation (working with heavy machinery, working in turbulent wave environments, transport to and from project sites, working with hazardous materials), children under the age of 18 will not be allowed to work on the project. The use of forced labour or conscripted labour on the project is also prohibited. The LMP includes a grievance redress mechanism (GRM) in Section 8 which will be provided to all workers and measures will be in place for all workers (including contractors) to access the GRM to raise any concerns related to the project.

The project will apply the following policies and procedures to address the key labour risks identified under Chapter 3 of the Labour Management Procedures (MICRO 2 LMP), i.e.,

- i. Construction related occupational health and safety (OHS) safety risks from operating heavy machinery, construction in turbulent wave environments, transport to and from project sites, handling hazardous materials and accidents or emergencies in isolated project sites.
- ii. Lack of awareness on OHS requirements: there is often a lack of use of PPE and safe work practices at worksites in remote island settings.
- iii. Influx of international workers to small island communities: increased risks of Sexual Exploitation and Abuse (SEA) /Sexual Harassment (SH), changes of power dynamics with increased cash flow, and the rise of communicable diseases.

The labour risks are assessed to be low as the project will follow the good international industry practice, as reflected in various internationally recognised sources including the World Bank Group Environmental,

### 6.1 Occupational Health and Safety

The health and safety procedure illustrated in the Labor and Employment Relations Act, WB Environmental and Health Safety Guidelines (EHSG) (General and Infrastructure) and ESS 2 will be referenced all activities under MICRO 2 infrastructure works implementation.

PMU will include into the bidding documents specific OHS standard requirements that all contractors will meet under this project. The standards will be consistent with local regulations, ESS2, WBG EHS guidelines and Good International and Industry Practices (GIIP).

The Contractors OHS Plan measures will be designed and implemented to address: (a) identification of potential hazards to project workers; (b) provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances; (c) training of project workers and maintenance of training records; (d) documentation and reporting of occupational accidents, diseases and incidents; (e) emergency prevention and preparedness and response arrangements

In addition, the OHS Plan, will also require the Contractor to:

- Provide fully stocked first aid stations at each construction site with workers trained in emergency First Aid.
- Provide appropriate Personal Protection Equipment (PPE) for all construction workers and ensure they are used and replaced if necessary
- Maintain daily contractor's diary and record any OHS accidents or incidents.
- Include any OHS accidents or incidents in monthly report.
- Report any serious accident or incident to Supervision Engineer.
- Prohibit usage of drugs and alcohol on construction sites and undertake regular alcohol testing.



- Install lights and cautionary signs in hazardous areas.

Project workers will receive OHS training at the start of their employment, and thereafter on a regular basis and when changes are made in the workplace, with records of the training kept on file. Training will cover the relevant aspects of OHS associated with daily work, including the ability to stop work without retaliation in situations of imminent danger (as set out in paragraph 27 of ESS2) and emergency arrangements.

All Project workers will also receive training on COVID-19 prevention, social distancing measures, hand hygiene, cough etiquette and relations with local community. Training programs will focus, as needed, on COVID-19 laboratory biosafety, operation of quarantine and isolation centres and screening posts, communication and public-awareness strategies for health workers and the general public on emergency situations, as well as compliance monitoring and reporting requirements, including on waste management, the Project's labour-management procedures, stakeholder engagement and grievance mechanism.

Workplace processes will be put in place for Project workers to report work situations that they believe are not safe or healthy. Project workers can remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to their life or health.

Project workers who remove themselves from such situations will not be required to return to work until an investigation has been conducted and necessary remedial action to correct the situation has been taken. Project workers will not suffer retaliation or otherwise be subject to reprisal or negative action for such reporting or removal.

## 6.2 COVID-19 Considerations

The presence of migrant brings regarding potential transmission risks for COVID-19 both within the worksite and for nearby communities. These risks are not only from workers that are mobilized from abroad or returning from abroad, but also workers moving from other regions.

In light of the COVID-19 world pandemic, the project will ensure to protect its workers, and to comply with those regulations that of the national government requirements for COVID-19 protection measures and with the WB Interim Note on COVID-19 Considerations in Construction/Civil Works Projects. The Project should prioritize and look after the well-being of the workers and monitor and follow the local and national health authority guidance on Covid-19.

All migrant workers will be required to be fully vaccinated with a WHO approved vaccine.

All workers are required to undergo the COVID-19 testing, if a worker has been tested positive or in contact with a positive COVID-19 case, the worker will be required to undergo the 14 days quarantine.

The contract will assess their workforce and identify appropriate mitigation measures through:

- Preparing a detailed profile of the project workforce, key work activities, schedule for carrying out which activities, different durations of contract and rotations. This should include a breakdown of workers who reside at homes, workers who lodge within the urban centre and workers in on-site accommodation. It should also identify the workers vaccination status and, where possible it should also identify workers that may be at more risk from Covid-19, those with underlying health issues or who may otherwise be at risk.
- Consideration should be given to ways in which to minimise movement across the international border.
- Consideration should be given to moving workers accommodated within the urban centre into accommodation on site.
- Workers from local communities who do not reside on site should be subject to health checks at the site entrances.

## 6.3 Labour Influx

To minimise the impact of labour influx, the project will contractually require the contractor to preferentially recruit unskilled labour from the local communities. This will be achieved through developing a local employment and skills development plan which may include:

- Preparing a local labour and skills registry for the islands (including their Funafuti based community members)
- Perform a work package analysis and breakdown to maximise the use of local labour,

- Provide comparison of skills and labour requirements from local and import labour,
- Provide upfront OHS training for all eligible local residents member to ensure all are equally prepared to commence working,
- Develop practical implementation measures and undertake monitoring.

All contracted workers will be required to sign the code of conduct (to be included in updated LMP prior to release of bid documents) before the commencement of work, which includes a provision to require the worker and contractor to prevent instances of SEA/SH. The code of conduct governs both on-site behaviours (with colleagues) and conduct in the community. Relevant training will be provided to workers, such as induction and daily toolbox talks outlining expected conduct and local community values.

#### 6.4 Prevention of Discrimination

The employment of project workers under the project will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination concerning any aspects of the employment relationship, such as recruitment and hiring, terms of employment (including wages and benefits), termination and access to training. To address the risk of exclusion of vulnerable groups such as women and persons with disabilities from employment opportunities, the project will require the contractor to employ such groups as part of their unskilled workforce. The contractor will also be required to comply with the provision of maternity leave and nursing breaks and sufficient and suitable toilet and washing facilities, separate from men and women workers where and when it is possible. The contractor will also be required to enable safety in the workplace to address potential sexual exploitation or harassment in recruitment or retention of skilled or unskilled female workers.

#### 6.5 Age of Employment

The project will only employ those who are age 18 and over. There will be no opportunity to employ any Tuvaluan or someone from outside of Tuvalu who has not reached the age of 18.

All workers for the project will be required to provide official documentation, which include a birth certificate, or a passport, or a national identification card, along with their educational and medical records. If a child is discovered to have applied or employed but has not attained the age of 18 will automatically disqualified or terminate her or his application or employment in a responsible manner, taking into account the best interest of the child.

#### 6.6 Fair Wages And Working Conditions

To avoid labour disputes, fair terms and conditions will be applied for project workers in the project (more details are provided in Section 6). The project will also have grievance mechanisms for project workers (direct workers and contracted workers) in place to promptly address their workplace grievances (more details are provided in Section 7). Further, the project will respect the workers' right of labour unions and freedom of association, as set out in the national Trade Union Act.

#### 6.7 Monitoring and Reporting

The contractor shall report to the PMU and the construction and supervision consultants on the status of implementation of the above policies and procedures on a monthly or quarterly basis. The PMU and the construction and supervision consultants will closely monitor the contractor/subcontractor on labour and occupational health and safety performance and report to the World Bank quarterly.

#### 6.8 Fatality and Serious Incidents

In the event of an occupational fatality or severe injury, the PMU shall report to the WB as soon as becoming aware of such incidents and inform the relevant government authorities (where available) in accordance with national reporting requirements. Corrective actions shall be implemented in response to project-related incidents or accidents. The PMU or, where relevant the contractor, will be required to conduct a root cause analysis for designing and implementing further corrective actions.

#### 6.9 Prioritising Local Workers

The Contractor should attempt to prioritise recruiting workers from the locally available workforce on the project islands.

This section of LMP will be updated prior to the release of construction bid documents to expand on the requirements of this approach. The updated section may include:

- Labour resourcing forecast
- Local labour-force and industry engagement and set up of a labour and supplier registry.
- Scoping and comparison of local supply and employment options
- Definition of requirements/incentives in bid documents for a) local employment, b) training, c) monitoring and compliance.

#### 6.10 Terms and Conditions

Applicable terms and conditions as per Tuvalu Employment Act applies, and the relevant stipulations in the ESMPs, including written service contract detailing the worker's salary, working hours & leave, rights and allowance, Code of Conduct, duration of contract, and terms and conditions for termination of contract by employer and worker alike. The contract should be signed by both parties, who each will keep a copy.

#### 6.11 Direct Workers

Direct workers' contracts are determined by the Employment Act, as they are directly employed by the relevant government agencies. Consultant service providers or construction and supervision consultants will be governed by the Standard WB Consultancy agreements which set higher standards than the national legislation.

#### 6.12 Contracted Workers

The following terms and condition guidance is taken from the national legislation and strengthened by ESS2 requirements where necessary.

**Minimum Wages:** While the mechanism to set the official minimum wage as prescribed by the Employment Act, it is not currently functioning. The fair market rate will be identified and applied for the Project workers.

**Hours of Work:** The regular hour of work of a project worker shall not exceed 8 hours a day or 48 a week (Employment Act). Hours worked more than the regular hours of work shall not exceed 12 hours a week and shall entitle a worker to a proportionate increase in remuneration.

**Meal and tea breaks:** Every worker who works more than 6 consecutive hours in 1 day is entitled to an unpaid break of one hour for a meal and to paid teak breaks during the day totalling 20 minutes (Labour and Employment Relations Act)

**Rest per week:** Every worker shall be entitled to one day's rest each week, which will fall on Sunday (Tuvalu Constitution). It shall consist of at least 24 consecutive hours each week. Workers shall also be entitled to a rest day on public holidays recognised as such by the State.

**Annual leave:** Workers shall be entitled to 12 days leave with pay for every year of continuous service (Art. 111). An entitlement to leave with pay shall usually be acquired after a full year of continuous service. A worker is entitled to take annual leave on a pro rata basis on the completion of 6 months service with an employer. (LERA)

**Maternity leave:** A female worker shall be entitled, on presentation of a medical certificate indicating the expected date of her delivery, to 12 weeks of maternity leave (LERA). During maternity leave, the female employee is entitled to 100% of her wages payable by the employer.

**Paternity Leave:** A workers who is the spouse or partner of a woman who gives birth or who adopts a child shall be entitled to 10 days paid paternity leave at 100% of their wage. Paternity leave will be taken within 4 months of the birth or adoption of the child. (LERA)

**Sick Leave:** A worker is entitled to 5 days paid sick leave for each continuous 12 months of service.

**Deductions from remuneration.** No deductions other than those prescribed by the Employment Act or regulations made thereunder, or any other law or collective labour agreement shall be made from a worker's remuneration, except for repayment of advances received from the employer and evidenced in writing. The contractor shall not demand or accept from workers any cash payments or presents of any kind in return for admitting them to employment or for any other reasons connected with the terms and conditions of employment.

**Medical treatment of injured and sick workers:** the cost of maintenance and treatment of a worker and his dependents residing in a place of employment shall be paid for by the employer as long as the worker remains in their employment. It shall be the duty of the employer to arrange at his own expense for the conveyance to the nearest hospital of any injured or sick worker who can be so conveyed and who cannot be treated on the spot with the means available (Employment Act).

**Collective Bargaining:** It is the right of workers to participate in collective bargaining under the provisions of Part 8 in the Labour and Employment Relations Act

### 6.13 Primary Supply Workers

For any primary workers involved in the supply chain (if found to be relevant), the following requirements will be met as per ESS2.

**Health and Safety:** Where there is significant risk of serious safety issues related to primary supply workers, the supplier will have OHS procedures and mitigation measures in place to address such safety concerns.

**Child or Forced Labour:** No children under the age of 18 will be employed as a primary worker.

## 7 Mitigation and Monitoring Plans

A full assessment of environmental and social impacts has been carried out and referred to in the MICRO ESIA. The ESIA also recommends mitigation measures to avoid, mitigate or reduce these impacts. The mitigation and monitoring plans in this ESMP are a direct replication of those in the ESIA and both documents should be read together to ensure complete understanding of the potential impacts and the extent to which this ESMP addresses those impacts.

A 'proportional' approach is taken in this Plan which means that all risks should not be treated equal and that more resources should be allocated to greater risks.

### 7.1 Funafuti Port Management Plans

Appendix A and B contains the required Management plans for the Funafuti investments for design, construction, and operational phases. The Management Plan for each site includes details of the mitigation measures required, the cost allocation, responsible entity, and the applicable project phase.

Supervision Plans are also provided for each project site. Supervision Plans are divided into three sections: (i) one-off preconstruction checklist; (ii) weekly checklist for the construction phase; and, (iii) supervision checklist for the operational phase of the investments.

The MPWIELMD PMU carries overall responsibility for ESF supervision. MPWIELMD and the PMU are responsible for incorporating the operational phase supervision requirements into their SOPs and annual work plans.

### 7.2 Contractor's Environmental and Social Management Plan

The C-ESMP will be the Contractor's governing document for the implementation of this ESMP during works. The C-ESMP will contain the contractor's methodology and planning for adhering to their ESF requirements. Additionally, the C-ESMP will detail how the Contractor plans to resource their team with personnel and financial resources as per the Contract. Appendix C in this ESMP provides a guide for the expected content of the C-ESMP.

The C-ESMP and associated management Plan will be developed, approved, and disclosed prior to commencement of civil works. The Contractor is required to produce the following management plans as part of their C-ESMP. These management plans are referred to throughout the ESMP. In addition to these management plans being a requirement for the C-ESMP, they will also be required in as part of the tendering process to demonstrate that the Contractor has started to consider these environmental and social impacts and has the capacity within their team to plan their ESF management strategies.

**Solid Waste Management Plan (SWMP):** The SWMP guidelines in Appendix D provide the governing principles for solid waste management and disposal for the MICRO Project. It provides the minimum standards for each waste stream and gives the Contractor guidance on how to implement waste separation, storage, and disposal. The guidelines also set the content for the SWMP and it is a requirement of the Contractor to provide all the required content as a minimum.

**Worker Management Plan:** The contractors will be required to provide a Worker Management Plan as part of their bids, explicitly detailing how the labour influx impacts will be minimized. This will not only cover the physical elements, but also interactions with locals, impacts on island resources (e.g., water, waste), and potential price inflation effects (see Appendix E). These requirements will be addressed more fully in the final ESMP for tender.

**Traffic Management Plan (TMP):** A TMP is required to detail how the safety of the pedestrians and vehicles will be maintained throughout the duration of works. Particular attention will need to be paid to separation of the public and heavy machinery at all times. The TMP will demonstrate how this will be achieved and will detail how the public will be informed of these measurements. Additionally, the TMP will include management of marine traffic including international and domestic transport of equipment and machinery. Management of ballast water will be included in the TMP.

**Spill Response Plan:** The Contractor will have a spill response plan in place to account for all potential instances. A Spill response plan will be developed to ensure that all fuels and lubricants used during the construction phase in machinery, equipment, generators and also on marine vessels are contained, collected, treated, and disposed of. Under the requirements of the IFC EHS Guidelines for Ports, Harbours, and Terminals the spill response plan will:

- (i) Identify areas within the port zone and nearby vicinity that are sensitive to spills and releases of hazardous materials and locations of any water intakes;
- (ii) Outline responsibilities for managing spills, releases, and other pollution incidents, including reporting and alerting mechanisms to ensure any spillage is reported promptly to the port authority and Department of Environment;
- (iii) Include provision of specialized oil spill response equipment (e.g. containment booms, recovery devices, and oil recovery or dispersant application vessels, etc); and
- (iv) Include regular training schedules and simulated spill incident and response exercise for response personnel in spill alert and reporting procedures, the deployment of spill control equipment, and the emergency care/treatment of people or wildlife impacted by the spill.

**Labour Management Plan (LMP):** Relates to Labour and Working Conditions. The Labor Management Plan (LMP) is a comprehensive plan that identifies the labour requirements and potential risks associated with the project. It ensures that contractors and workers comply with relevant national laws, regulations, and standards for labour and working conditions, including the World Bank's ESS2. The more stringent provisions will always apply in case of any conflicts. The LMP will follow the MICRO 2 LMP, which includes terms and conditions of employment, non-discrimination and equal opportunity policies, workers' organizations, restrictions on child and forced labour, and OHS in design, construction, and operational phases. Additionally, the plan includes a workers' Grievance Redress Mechanism (also see section 6).

## 8 ESMP Implementation

### 8.1 Integration of ESMP into Project Management

This ESMP will be included in the bid document package.

The ESF requirements of this ESMP will be referenced in appropriate parts of the technical specifications, Contractor's contract and any TORs for supervision or issued under the MICRO Project. The PMU ESF Specialist will be required to review all bid documents prior to approval.

Prior to commencement of works, the Contractor will be required to attend a half day pre-construction ESF workshop with the PMU ESF Specialist to ensure that all parties understand their obligations under the terms of the Contract.

The plan allows for adaptive management of risks and mitigation measures in response to unanticipated project changes, changes in project conditions, unforeseen circumstances, or unanticipated obstacles to achieving satisfactory outcomes.

These will be managed through consultation between the IA, and as necessary, key stakeholders, contractors, and the World Bank. Any necessary changes will be made to this and associated management plans and reported through formal channels.

## 8.2 Roles and Responsibilities

There are several agencies and parties who have responsibility to implement, monitor and report on the MICRO ESMP. Details of the responsibilities assigned to each role are summarised in this section.

## 8.3 Project Task Force

A Task Force was established in February 2015 to oversee preparation and implementation of the ADB OIMIP projects, its responsibilities have also now been expanded to the MICRO Project. The Task Force is comprised of the permanent secretaries of five ministries (MOF, MPWIELMD, MLGA, OPM) and staffs from the CPMO, Director of Environment. The Task Force:

- Provides policy guidance on project implementation and management such as institutional strengthening;
- Makes important decisions on project preparation and implementation such as determining project scope, procurement, and consultant selection decisions, and seeks approval of Cabinet as necessary according to relevant acts;
- Oversees project management of MPWIELMD and PMU, monitoring progress of project preparation and implementation and suggests remedial action when any indication of delay is identified;
- The Task Force is directly involved in the Grievance Redress Mechanism, to resolve grievances that may be referred to it by the Project Manager.

## 8.4 Ministry of Public Works, Infrastructure, Environment, Labour, Meteorology, and Disaster

The MPWIELMD is the executing agency for MICRO. The MPWIELMD also acts as the secretariat for the Task Force. The key function of the MPWIELMD for MICRO is:

- Act as focal point for communications with WB on project related matters
- Ensure PMU is fully staffed and functional during entire period of implementation
- Supervise PMU through Project Director
- Administer all consultant works and contracts
- Ensure compliance with WB funding requirements, including ESF compliance
- Provide inputs into project scope and design

## 8.5 Project Director

The post of the Project Director is currently in final selection stage and will be onboard late November, currently the Finance Specialist is the Acting Project Director. The Project Director will, with the support of the PMU, manage and monitor project implementation activities, ensuring compliance with government and WB's requirements. The Project Director will also:

- Initiate Task Force meetings as necessary and at least quarterly.
- Review monthly progress report from the PMU
- Facilitate coordination with government agencies and outer island communities through MHARD necessary to prepare and implement the project.
- Oversee reporting and monitoring of project performance including preparation of monthly and quarterly project progress reports.
- Assist WB during project review missions

## 8.6 Project Management Unit

The Program Management Unit was established under the ADB OIMIP project but the World Bank will be responsible for managing the MICRO Project. The PMU includes the Program Manager, Project Manager for MICRO and Project Manager for OIMIP; Accountant, Procurement Officer, Project Contract Manager

and ESF Officer. The MICRO PMU, supported by the CPMO, will be responsible for oversight of ESF for the Project and these duties will include:

- Acts on behalf of the Project Director and works closely with all contracted parties to ensure that MICRO objectives are delivered in a compliant manner consistent with MPWIELMD and WB requirements;
- Monitor and evaluate project activities and outputs and report the findings to the Project Director by monthly progress reports. These reports will include all aspects of ESF compliance of the Project including the results of scheduled monitoring, and instances of non-compliance, any environmental incidents and any GRM submissions/responses;
- Conducting quarterly ESF audits with the Supervision Engineer's ESF specialist and other staff;
- Monitoring of the Contractor as per the requirements of the ESMP Supervision Plan for compliance with the ESMP;
- Ensure that contractors prepare their labour management plan (Contractor's LMP) that complies with the MICRO 2 LMP for approval before the contractor is allowed to mobilise to the field and monitor its implementation;
- Monitors and manages all complaints/incidents reported to the Project GRM;
- Manages the review process of Contract ESMPs up to formal approval;
- Updating the ESMP as necessary to reflect project change;
- Applying for all DoE approvals and permits;
- Facilitate meaningful consultations with stakeholders to enable them to provide meaningful input and direction into the Project;
- Publicly discloses any project information and reports including this ESIA and ESMP;
- Provide support and recommendations to the Supervision Engineer for any instances of Contractor non-compliance;
- Receive and review monthly reports from Supervision Engineer and share reports with Project Director;
- PMU with the support of Project Director is responsible for managing recurring instances of non-compliance by the Contractor as they are referred by the Supervision Engineer and
- Responsible for managing all instances of non-compliance by the Supervision Engineer

### 8.7 Design Consultant

It is the Design Engineers responsibility to:

- Comply with this ESIA/ESMP in the development of the concept designs, detailed design, procurement bid documents and other advice to the PMU;
- Avoid or minimise environmental and social impacts by design;
- Undertake meaningful consultation with stakeholders to inform the design process.

### 8.8 Contractors

It is the Contractors responsibility to:

- Ensure the Contractor's project team includes experienced ESF specialist(s) with sufficient in-country time allocation and financial resources specified in the Contract;
- Prepare and complete all requirements for the DoE permit (initiated by the PMU);
- Prepare the C-ESMP and include all the necessary sub-plans such as Solid and Hazardous Waste Management, Invasive Species Management Plan, and others (see Appendix C: section 10);
- Prepare and have cleared by the Supervision Engineer the C-ESMP in accordance with this ESIA/ESMP prior to commencement of works;
- Carry out the Project implementation in accordance with the C-ESMP;
- Not to undertake any works or changes to works unless first approved in an updated C-ESMP;
- Conduct daily and weekly ESF inspections of the works to ensure compliance and reporting the results of these inspections to the Supervision Engineer;
- Proactively update the C-ESMP as construction methodology or another features change;
- Undertake stakeholders consultations on the draft C-ESMP in coordination with the PMU;
- Advise the Supervision Engineer of any changes to works or methods that are outside the scope of the ESIA and ESMP for updating;

- Post all notifications specified in this ESMP at the site entrance;
- Prepare and implement a labour management plan (Contractor's LMP). This plan will be submitted to the PMU for review and approval before the contractor is allowed to mobilise to the field.
- Adopt the Workers Code of Conduct (as per the MICRO 2 LMP) and have all workers sign and trained on this agreement;
- Report all environmental and OHS incidents to the Supervision Engineer for any action;
- Provide monthly reports of all ESF monitoring, incidents, complaints, and actions to the Supervision Engineer;
- Maintain a database of all complaints, incidents or grievances received. Any issues which cannot be dealt with immediately should be reported to the Supervision Engineer.

### 8.9 Supervision Engineer

The Supervision Engineer is responsible for the day-to-day oversight of the construction works for the Project, including ESF compliance. The Supervision Engineer is the only party who is contractually able to provide instruction to the Contractor. The Supervision Engineer will work closely with the Contractor on a daily basis to ensure that the Project is implemented in a compliant manner consistent with the detailed designs provided and the ESMP. They are responsible for:

- Daily monitoring the Contractors work for compliance with the C-ESMP and ESMP as per the measures detailed in Appendix A and B providing ESF monitoring results in their monthly reporting to PMU. As part of their C-ESMP monitoring responsibilities, the Supervision Engineer will ensure that a suitably qualified and experienced ESF specialist is resourced to provide regular site inspections and is available for support at other times to respond to incidents, non-compliances, review of C-ESMP, update of the ESMP and other tasks.
- Develop a Supervision Monitoring Plan to demonstrate how the monitoring requirements of the ESMP will be achieved;
- Managing the review process of C-ESMPs for approval. The Supervision Engineer must ensure that all current ESF instruments have been reviewed internally as well as by the PMU and final approval from WB has been secured before disclosure;
- Updating the ESIA and ESMP as necessary to reflect changes in the designs;
- Working with Contractor and PMU to provide meaningful input and direction into stakeholders consultations;
- Managing instances of non-compliance by the Contractor and reporting all instances to PMU. They are also responsible for escalating recurring instances of non-compliance by the Contractor to PMU for action;
- Managing and responding to all direct complaints/incidents received by their representatives as per the GRM process in Section 7.5 and reporting all instances to PMU for inclusion into Project database.

### 8.10 ESMP Budget

The costs of implementing the ESMP for the Contractor and Supervision Engineer will be included in the tender documents and shown on the Bill of Quantity (BOQ). It is the contracting parties' responsibility to ensure that they have provided adequate financial resources to undertake all responsibilities as prescribed in the ESMP for the implementation and monitoring of environmental and social mitigation measures. The following is an approximate budget for implementing the ESMP by the PMU, based on the tables in Appendix A and B. These items are over and above those considered to be covered by normal operations on a civil works project.



Budget Item	Detail	Timeframe	Cost Estimate (AUD)
<b>Funafuti Port</b>			
Stakeholder consultations	Catering, venue hire, media, materials, travel and accommodation, translation and interpretation services, etc.	Prior to commencement of major works and then ongoing as needed	10,000
Engagement of part-time National ESF Specialist	Fees, operating costs, office support and maintenance, communication, transport etc.	All of project implementation	150,000
HIV/GBV Training	Costs of training by local organisations	Prior to start of works	5,000
Disclosure of instruments ESF	Translation, report production, distribution	Prior to start of works	4,000
GRM related costs	Personnel, communication, transportation, office support costs	All of project implementation	5,000
	<b>Estimated Total Budget</b>		<b>174,000</b>

## Appendix A: Environmental and Social Management Plans

### MICRO Project Investments Design and Pre-Construction Phase Mitigation Plan

Project Activities	Mitigation Measures	Cost	Responsibility	Start	End
General	<ul style="list-style-type: none"> <li>The ESIA/ESMP will be included in the Contractor's and Supervision Engineer's specification and contract</li> <li>Specific mitigation measures for the contractor or Supervision Engineer shall be highlighted in the contract clauses</li> </ul>	Minor, included in tendering costs	MPWIELMD*	Tender Preparation	Signing of contract
General	<ul style="list-style-type: none"> <li>Contractor and Supervision Engineer will include at least one ESF specialist as per contractual requirements</li> <li>ESF specialists will be adequately resourced to provide in-country support.</li> </ul>	Minor, included in tendering costs	MPWIELMD*	Tender Preparation	Signing of contract
General	<ul style="list-style-type: none"> <li>Apply for and secure permits under the appropriate national legislation.</li> <li>Prepare and submit the necessary documents to the Director of the Department of Environment in accordance with the EIA Regulations for the environmental permit.</li> </ul>	Minor	MPWIELMD*	Design phase	Prior to construction starting
General	<ul style="list-style-type: none"> <li>The Contractor shall develop a Contractor's ESMP (C-ESMP) in accordance with the requirements stipulated throughout the ESMP. C-ESMP will include Traffic Management Plan, Worker Management Plan and Solid Waste Management Plan (following requirements in ESMP Appendices). C-ESMP will be cleared by the Supervision Engineer.</li> <li>All Project staff will be trained on this plan and attendance will be recorded.</li> <li>Contractor will maximise use of local labour to minimise need of foreign workers wherever practicable.</li> </ul>	Included in contract (IIC)	Contractor	Award of Contract	Prior to Construction Starting
Design of Harbour Facility	<ul style="list-style-type: none"> <li>Coastal modelling will be subject to independent review</li> <li>Include design features to minimise or recover sediment attracted into harbour basin</li> <li>Develop construction methodology that maximises availability of existing boat ramp to fisherfolk and cargo deliveries.</li> <li>Consider safety swimmer aspects in infrastructure design and current modelling.</li> <li>Universal Design concepts to be used to maximise accessibility for all.</li> <li>Undertake detailed coastal modelling on both concept designs and on final detailed design.</li> <li>Pedestrian and vehicle traffic to be segregated for safety as far as practicable.</li> <li>Develop maintenance plan to manage algal growth.</li> <li>Provision of manual solution for cargo offload should the hydraulic truck break down.</li> <li>Provision of dedicated system for transporting the elderly, infirmed and persons with disabilities from ship to shore (chair hoist, secure pod, gangway, etc.)</li> </ul>	IIC	Design Engineer/PMU	Development of concept designs	Approval of final detailed design
Design of Buildings	<ul style="list-style-type: none"> <li>Septic system to be designed to GoTv approved standard.</li> <li>Rainwater harvesting from building roof to be included with overflow directed towards vegetated areas.</li> </ul>	IIC	Design Engineer/PMU	Start of building design	Approval of detailed design

Project Activities	Mitigation Measures	Cost	Responsibility	Start	End
	<ul style="list-style-type: none"> <li>Minimise rain run off towards the boat ramp and instead divert to vegetated areas</li> <li>Building foundation and floor level need to be reinforced and climate resilient.</li> <li>The building will remain within existing foundations footprint and will not encroach into the vegetation lines.</li> <li>No trees may be removed to accommodate for the building design.</li> <li>No new berm crest access points for the buildings will be permitted to cross the vegetation line.</li> <li>Universal Design concepts to be used to maximise accessibility for all.</li> </ul>				
Design of Port Pavement	<ul style="list-style-type: none"> <li>Include separation between storage yard and beach on the northern end of paved area</li> <li>Provide dedicated storage facility for fuel and oil drums with bunding and treatment measures in place.</li> <li>Pavement design to take into account surface water drainage management.</li> </ul>	IIC	Design Engineer	Start of design process	Approval of final detailed design
New Retaining Seawall	<ul style="list-style-type: none"> <li>Implement measures to minimize sediment runoff into the water during excavation.</li> <li>Utilize eco-friendly construction materials to reduce the environmental impact.</li> <li>Use erosion control measures, such as natural barriers or geotextiles, to protect against shoreline erosion during construction.</li> </ul>	IIC	Design Engineer	Start of design process	Approval of Final detailed design
Climate Resilience and Longevity	<ul style="list-style-type: none"> <li>Ensure the design and materials used considers/anticipates future climate change impacts.</li> </ul>	IIC	Design Engineer	Development of Concept Design	Prior to Construction Starting
Solid and Hazardous Waste Management	<ul style="list-style-type: none"> <li>The Contractor shall develop a Solid Waste Management Plan in accordance with the requirements included in Appendix D of the ESMP for clearance by the Supervision Engineer.</li> <li>Contractor will consult with GoTv Waste Management Department (WMD) on export of hazardous substances.</li> <li>All Project staff will be trained on this plan and attendance will be recorded.</li> </ul>	Minor, part of standard practices	Contractor	Design phase	Prior to Construction Starting
Spill Response	<ul style="list-style-type: none"> <li>The Contractor will have a spill response plan in place to account for all potential instances.</li> <li>Spill response plan will be developed to ensure that all fuels and lubricants used during the construction phase in machinery, equipment, generators and also on marine vessels are contained, collected, treated, and disposed of.</li> <li>Under the requirements of the IFC EHS Guidelines for Ports, Harbours, and Terminals the spill response plan will:                             <ul style="list-style-type: none"> <li>Identify areas within the port zone and nearby vicinity that are sensitive to spills and releases of hazardous materials and locations of any water intakes.</li> <li>Outline responsibilities for managing spills, releases, and other pollution incidents, including reporting, and altering mechanisms to ensure any spillage is reported promptly to the port authority and Department of Environment.</li> <li>Include provision of specialized oil spill response equipment (e.g., containment booms, recovery devices, and oil recovery or dispersant application vessels, etc.).</li> </ul> </li> <li>Include regular training schedules and simulated spill incident and response exercise for response personnel in spill alert and reporting procedures, the deployment of spill</li> </ul>	Minor, part of standard practices	Contractor	Design Phase	Prior to Construction Starting

Project Activities	Mitigation Measures	Cost	Responsibility	Start	End
	control equipment, and the emergency care/treatment of people or wildlife impacted by the spill.				
Mobilisation of machinery and equipment from source country	<ul style="list-style-type: none"> <li>Ensure all construction machinery and equipment is steam cleaned of all organic material in source country prior to deployment. Ensure all aggregates are subject to biosecurity treatment from overseas before shipping to Tuvalu, and acquire imported permit from Department of Agriculture prior to deployment. An Invasive Species Management Plan to be developed and included in the C-ESMP.</li> <li>Ensure aggregate is sourced from approved/ permitted quarry sources and are operating in accordance with Tuvalu law.</li> <li>Provide an approved phytosanitary certificate and any other documentation required under Tuvalu legislation.</li> <li>Ballast water of cargo vessels to be discharged no closer than 5km from the shoreline. Confirm with ship captain and review of log.</li> <li>Size of imported construction equipment (excavator, digger, etc) should be kept to a workable minimum.</li> </ul>	IIC	Contractor	Prior to mobilisation	Completion of all importing activities
Offloading / Removing construction equipment and materials	<ul style="list-style-type: none"> <li>Construct barriers to prevent pedestrian access during offloading operations</li> <li>Define minimum width corridor for machinery to move through which avoids any vegetated area and minimised distance travelled over sand.</li> </ul>	IIC	Contractor	Development of C-ESMP	Demobilization
Stockpile and Laydown sites	<ul style="list-style-type: none"> <li>Ensure designated sites have capacity for the volume of spoil calculated and for construction staging activities</li> <li>Ensure the designated stockpile site is appropriately bunded.</li> <li>Management and operations of site addressed is C-ESMP prepared by Contractor and cleared by Supervision Engineer.</li> <li>Ensure no significant environmental or social impacts because of location and operation of laydown and stockpile areas.</li> <li>Laydown sites will be at least 150m from any body of water.</li> <li>Stockpile sites will be at least 50m from any body of water.</li> <li>Any lease agreements follow the requirements of this ESIA/ESMP and national legislation.</li> </ul>	IIC	Design Engineer	Development of Concept Designs	Prior to mobilisation
Workers and Project Accommodation (if required)	<ul style="list-style-type: none"> <li>Use of existing accommodation for project office and project management team</li> <li>Main workers accommodation camp not to be located within the main areas of the site</li> <li>Select sites where vegetation has already been modified or cleared.</li> <li>Ensure no potential significant environmental or social impacts from location or operation of worker's camp.</li> <li>Any new bathroom and toilets will have PWD approved septic tank installed.</li> <li>If rehabilitating existing buildings, plan to hand back to the government in a usable condition.</li> <li>Addressed in C-ESMP prepared by Contractor and cleared by Supervision Engineer</li> <li>Any lease agreements follow the requirements of this ESIA/ESMP and national legislation.</li> </ul>	IIC	Design Engineer / Contractor / Supervision Engineer / Kaipule / PMU	Development of concept designs	Prior to mobilisation



Project Activities	Mitigation Measures	Cost	Responsibility	Start	End
Stakeholder Engagement	Implement all provisions of the MICRO 2 MICRO 2 (P177100) Stakeholder Engagement Plan (SEP), as applicable to the Funafuti Wharf works.	IIC	MPWIELMD*	Prior to mobilisation	Prior to Construction starting
Chance Finds Procedures	Implement all provisions of the MICRO 2 MICRO 2 (P177100) Chance Finds Procedures, as applicable to the Funafuti Wharf works.	IIC	MPWIELMD*	Prior to mobilisation	Prior to Construction starting

\*Assumes support from the CMPO

MICRO Project Investments Construction Phase Mitigation Plan

Project Activities	Mitigation Measures	Cost	Responsibility	Start	End
Offload, transport, and operation of construction machinery	<ul style="list-style-type: none"> <li>All machinery to be in sound condition and free from any leaks of lubricants and fuel.</li> <li>Maintain construction equipment.</li> <li>Any machinery generating visible smoke is not permitted for construction activities.</li> <li>Select landing area prior to arrival of equipment. Same location to be used for all offloading and demobilisation.</li> <li>Offloading of equipment will only be undertaken at low tide.</li> <li>Define and clearly mark conservative working areas on the beach, berm crest, building location and reef flat for all heavy plant and machinery. No machinery will be permitted to cross the beach crest.</li> <li>No trees or vegetation to be removed or damaged unless already approved in the C-ESMP.</li> <li>NLO to consult with the Kaupule and Police to understand sensitive times where movement of machinery might have to be limited.</li> <li>Traffic Management Plan will be implemented and ongoing consultations between Contractor (CLO) and community regarding traffic movements.</li> <li>The contractors will be required to have an approved speed management system for all vehicles to ensure that they comply with the agreed speed limits, hours of operation, and follow the nominated routes (e.g. <a href="http://www.gps-server.net">www.gps-server.net</a>). Vehicles will also be equipped with appropriate high-visibility or reflective elements on the vehicles, as well as orange revolving lights or strobe lights as additional warning signs.</li> <li>Spill kits to be placed at all fueling locations and on construction equipment.</li> <li>Refueling only to occur in designated area within laydown site on hardstand area or over drip trays.</li> <li>Immediately repair any damage caused to community or private facilities.</li> <li>Pay appropriate construction damage compensation to affected parties as determined by the approved Government compensation schedule.</li> <li>Training for all machinery operators on ESHS risks to marine environment and vegetation line from accidental damage during construction.</li> <li>All berm crossings will take place at existing boat ramp. No construction machinery will transit between the village and the beach at any other location.</li> </ul>	IIC	Contractor	Pre-mobilisation	Demobilisation
Traffic (pedestrian and vehicle) Management	<ul style="list-style-type: none"> <li>Implement the traffic management plan (TMP) to ensure smooth traffic flow and safety for workers, passing vehicles and pedestrian traffic.</li> <li>Where appropriate, employ flag operators on the road to prevent traffic accidents. The workers shall have relevant safety equipment and training.</li> <li>The TMP should prohibit the use of engine breaking close to and through communities and inhabited areas, it should also regulate the working hours for the haul trucks.</li> </ul>	IIC	Contractor	Prior to works	Demobilisation
Dredging	<ul style="list-style-type: none"> <li>Do not exceed design specifications for dredging</li> <li>Limit machinery to a defined narrow area on the reef flat.</li> </ul>	IIC	Contractor	Start Dredging	End Dredging

	<ul style="list-style-type: none"> <li>• Carry out dredging on the mid-low-mid tide cycle as far as practicable to reduce the amount of sediments that can become suspended.</li> <li>• Do not stockpile material on the reef flat between tides</li> <li>• Daily records to be kept of site conditions during each work period including plume density and extent.</li> </ul>				
Stockpile area	<ul style="list-style-type: none"> <li>• Bund the dredge spoil stockpile area using local soil or sandbags to reduce sediment movement away from site.</li> <li>• No sediment disposal site to be closer than 50m from any Pulaka pits.</li> <li>• Disposal of dredged materials into the ocean is not permitted.</li> <li>• Disposal of dredged materials is not permitted along the foreshore.</li> <li>• Provide crushing plant at stockpile area to generate usable aggregates from dredged spoil.</li> </ul>	IIC	Contractor	Start Dredging	Completion of works
Rehabilitation of existing seawall wharfs, jetties	<ul style="list-style-type: none"> <li>• Machinery only to be used within the marked working area</li> <li>• Construction activities on the reef flat to take place on the mid-low-mid tide cycle.</li> <li>• Pedestrian access to work site to be strictly controlled</li> <li>• Spill kit available during all work with machinery on the reef flat.</li> <li>• No reef flat construction works to take place during period of bad weather.</li> <li>• Implement a water (quality) management plan to protect the ground water resources and monitor sediment plumes with corrective actions.</li> <li>• Routine beach profiling and monitoring work to be carried out by the Supervision Engineer to identify significant changes in sediment plumes and to the littoral drift, outside the normal seasonal fluctuations. Significant changes will result in a works being stopped and reassessment of the design and construction methodologies. Supervision Engineer will adopt an adaptive management approach to prevention of shoreline erosion.</li> </ul>	IIC	Contractor	Start of construction	Completion of works
Construction of buildings	<ul style="list-style-type: none"> <li>• Contractor method statement approved by Supervision Engineer prior to the start of any excavation.</li> <li>• Planning of works such that excavated or bare substrate is exposed for a minimum period of time.</li> <li>• No excavation works immediately before any advancing bad weather system.</li> <li>• All excavated material to be removed from foreshore environment.</li> <li>• No excavated material to be stockpiled on the beach or reef flat between tides.</li> <li>• Plant suitable ground cover vegetation and trees in front of building foundations.</li> <li>• No vegetation line trees or ground cover to be removed or damaged during construction.</li> <li>• Division bunding or other similar methods to be used for large areas of vegetation clearance for laydown and stockpile sites and around excavations.</li> <li>• Re-vegetate disturbed areas that are not being paved as soon as practicable (loosen ground; apply topsoil; seed or plant as necessary).</li> <li>• Control overland drainage to prevent channeling and sediment transport by diverting flows away from exposed areas. Sediment laden runoff from excavations or stockpiles must be directed to a settling area or collected for dust suppression provided the runoff is not contaminated with any chemicals (e.g. fuel). Discharges of treated wash water are</li> </ul>	IIC	Contractor	Start of construction	Completion of works



	to occur to land only, at least 500m from any bore used for potable water at a rate not exceeding 20mm/day or the infiltration rate of the ground (i.e. no ponding or runoff).				
Paving of Funafuti Port	<ul style="list-style-type: none"> <li>Sediment catchment around the Funafuti Port works along exposed coastal systems</li> </ul>	IIC	Contractor	Start of works	Completion of paving
Aggregate	<ul style="list-style-type: none"> <li>No sand or aggregates will be sourced from any quarry, borrow pit or beach in Tuvalu.</li> <li>Prioritise use of crushed dredged material over imported aggregates.</li> <li>Provide an approved phytosanitary certificate and any other documentation required under Tuvalu legislation prior to dispatch from country of origin.</li> <li>Present biosecurity and quarantine approvals along with any import permits to Supervision Engineer for clearance before offloading any materials.</li> </ul>	IIC	Contractor	Pre-mobilisation	Offload of aggregates
Clearance of vegetation (laydown site, building location, stockpile area, workers camp)	<ul style="list-style-type: none"> <li>Clearance work will be limited to clearly defined rules set out by the Environment Department</li> <li>Clearly identify any areas of cultural and spiritual significance prior to clearing work (e.g., graves). Any significant sites will be avoided and a 10m buffer placed around them.</li> <li>All personnel to be aware of the location and the limits of clearance before work commences on site. This is to be delivered through induction training.</li> <li>Avoid or minimise removal of coconut or other large and/or crop trees.</li> <li>No disposal of spoil, vegetation or organic matter into any water body or lagoon environment.</li> <li>No clearance of any vegetation within 50m of the existing foreshore for camp or laydown.</li> <li>No vegetation clearance within 20m of the existing foreshore for the cargo and passenger building.</li> <li>Minimise the footprint of facilities to reduce the area of cleared vegetation.</li> <li>Use former cleared land as a preference and where suitable.</li> <li>Surface water controls where required.</li> </ul>	IIC	Contractor	Start of works	Completion of works
Solid Waste Management	<ul style="list-style-type: none"> <li>Approved Solid Waste Management Plan will be fully implemented.</li> <li>All construction workers will be trained on the correct and expected management measures for solid waste as part of the induction process.</li> <li>Remove all inorganic, non-reusable and solid waste generated as a result of the project.</li> <li>Implement waste management in the order of avoid, reduce, reuse, recycle.</li> <li>No solid waste to be dumped in sea or lagoon waters.</li> <li>Burning of solid waste is not permitted.</li> <li>Compost all green and organic waste to assist soil improvement for the production of communal food crops or use as pig food.</li> <li>Export of all hazardous waste will be subject to the measures in this ESIA/ESMP and in coordination with the Waste Management Department.</li> <li>Leftover dredged material will be made available to the Department of Waste Management for community use.</li> </ul>	IIC	Contractor	Prior to commencement of works	Demobilisation
Grey water and sewage	<ul style="list-style-type: none"> <li>All construction camps and temporary worker sites will have latrines with 3 chamber septic tanks as stipulated by PWD to store and treat all grey and septic water.</li> <li>Facilities to be removed at the completion of the construction works unless required by</li> </ul>	IIC	Contractor	Prior to commencement of works	Demobilisation

	the community.				
Hazardous Substance Storage	<ul style="list-style-type: none"> <li>Fuel will be stored in dedicated areas at the laydown site or workers camp in sealed tanks placed within a concrete bund that has 100% of the capacity of the drums or storage.</li> <li>The storage area will be at least 50m away from the marine environment and should be fully secured, locked when not in use and shaded from direct sunlight.</li> <li>MSDS should be provided for all hazardous substances.</li> <li>Smaller volumes of hazardous substances should be contained within a metal storage shed locker within the storage shed.</li> <li>Lined pits to separate oil and water will be required near any workshop or maintenance shed to prevent leaching of hydrocarbons into the water table.</li> </ul>	IIC	Contractor	Prior to commencement of works	Demobilisation
Spill Management and Response	<ul style="list-style-type: none"> <li>Spill response plan to be included in the C-ESMP and implemented during construction.</li> <li>Comprehensive site induction prepared by the Contractor, with input from the PMU, will be required for all personnel involved with the project, with specific attention made to the particular environmental sensitive receptors of the project islands.</li> <li>All personnel involved in the handling of dangerous goods should be trained and inducted in the handling, emergency procedures and storage requirements for different types of substances.</li> <li>Vehicles and machinery will be refueled by authorized and trained personnel only in designated areas to reduce the likelihood of spillage in a sensitive environment.</li> <li>Drip trays will be used during refuelling or servicing to prevent spillages onto the ground.</li> <li>No refuelling of machines or vehicles will be permitted in the marine environment.</li> <li>Development of procedures for cleaning up and reporting of accidental spills as part of the Spill Response Plan.</li> <li>Limit the amount of any marine paint to be used to no more than 2 litres at any one time contained within a larger volume drip tray to reduce the risk of any accidental spillage into the water.</li> </ul>	IIC	Contractor	Prior to commencement of works	Demobilisation
Influx of labour	<ul style="list-style-type: none"> <li>Recruit NLO from within the community and in consultation with key stakeholders.</li> <li>Site induction conducted for all construction personnel at start of construction with input from PMU and MPWIELMD.</li> <li>All worker to have undertaken approved HIV/AIDS and GBV prevention training in Tuvalu and to have signed code of conducts as included in the contract.</li> <li>All foreign workers must have valid visas.</li> <li>Recreational facilities to be provided to workers.</li> <li>Implement Workers Management Plan.</li> <li>Regular inspection and monitoring of workers accommodation.</li> <li>Workers to respect village and landowner boundaries, observe codes of conduct and avoid damage to properties and resources.</li> <li>Ensure enough food and water is delivered for the duration or works. Schedule supplementary deliveries well in advance as needed.</li> <li>No alcohol will be consumed by the workers nor provided by the employer.</li> </ul>	IIC	Contractor	Prior to arrival of workers	Demobilisation
Workers Accommodation (if required)	<ul style="list-style-type: none"> <li>Employ local women groups to cook food for the workers using the imported foods.</li> <li>Employ local women to undertake housekeeping services around the worker's camp.</li> </ul>	IIC	Contractor	Prior to arrival of workers	Demobilisation

	<ul style="list-style-type: none"> <li>• Employ local workers where practicable.</li> <li>• Use of wood as fuel is not permitted.</li> <li>• No dumping of solid waste in or near water bodies.</li> <li>• Separation and secure storage of solid waste and food waste (for pig feed if appropriate).</li> <li>• Provide fully stocked first aid kit with site workers trained in in emergency First Aid.</li> <li>• Sufficient quantities of potable water must be provided for the workers.</li> <li>• No community water tanks will be used for workers camp potable water.</li> <li>• Manage water use during dry periods.</li> <li>• Do not use potable water for dust suppression.</li> <li>• Camp must be kept clean from food scraps and waste to minimise pests (Rats, YCA)</li> <li>• Facility to either be removed and the site restored after use, or any rehabilitated buildings will be handed over to the government after use.</li> </ul>				
Dust Generation	<ul style="list-style-type: none"> <li>• Use sea water only on sandy areas as a dust suppressant.</li> <li>• Apply water to access road within 50m of any occupied dwelling and through village during dry season to reduce visible dust levels due to construction activities.</li> <li>• Cover loads of fine aggregate during haulage.</li> <li>• Any crushing plants for dredge spoils will be located within laydown site and screened.</li> <li>• Cover or wet down stockpiles containing fine material (e.g., sand and topsoil) when not actively being used. Wetting of stockpiles is allowed but due to freshwater constraints should be kept to a minimum.</li> <li>• All surfaces should be constructed to their final design solution as quickly as practicable.</li> <li>• Keep work areas clean with regular sweeping.</li> <li>• Only small areas should be cleared of vegetation at any one time and re-vegetation should occur as soon as practicable.</li> <li>• Dust masks and personnel protective equipment must be available for workers during dust generating activities (e.g., pavement milling).</li> <li>• Manage speed of transportation trucks on unsealed roads, particularly when passing through settlements.</li> </ul>	IIC	Contractor	Start of construction works	End of construction works
Noise and Vibration Disturbance	<ul style="list-style-type: none"> <li>• Minimise nuisance from noise, especially closer to residential areas and sensitive receptors, through establishment and communication to affected parties of working hours, including night works and avoid increase of noise and number of work equipment at outside of advertised hours. Advertise working hours at the site entrance.</li> <li>• If possible, use noise barriers / screens or mounds to shield sensitive receptors.</li> <li>• Workers in the vicinity of sources of high noise shall wear necessary protection gear rated for the situation they are being used.</li> <li>• Signage to outline complaints procedure (GRM) and contact details of recipient of complaints.</li> <li>• The WB/IFC EHS Guidelines<sup>1</sup> Section 1.7 - Noise Management shall be applied. Noise impacts should not exceed the levels at the closest residential or other sensitive social receptors for one-hour LAeq of 55 dBA between the hours of 0700-2200 or 45 dBA outside of these hours for night works or result in a maximum increase in background</li> </ul>	IIC	Contractor	Start of construction works	End of construction works

	<p>noise levels of 3dB at the nearest receptor location off site. The nearest sensitive receptors are the closest residences to the active works and to the laydown site.</p> <ul style="list-style-type: none"> <li>Contractor will develop a work schedule or operations with Police to identify hours and days of no work due to religious and cultural activities.</li> <li>Mostly limit construction activities to daytime hour. If construction is proposed at night, contractor will develop a work schedule of operations with Police.</li> </ul>				
Stockpile and Laydown sites	<ul style="list-style-type: none"> <li>Areas will be securely fenced.</li> <li>Bunded and covered areas will be installed for the storage and handling of hazardous materials and/or substances, the wash down of machinery, the preparation of concrete and the prefabrication of solar arrays.</li> <li>Run off from these bunded areas will be collected, treated, and tested before being either reused for construction purposes or allowed to discharge into the ground, away from the marine environment. Discharge will be at a rate to allow absorption without causing surface flooding.</li> <li>Segregated storage for solid waste will be provided. This area will be clearly marked and designed to ensure that as waste is secure.</li> <li>Worker inductions will include a tour of the laydown area and required practices from workers.</li> <li>Spill response kits will be available, and workers trained in their use.</li> </ul>	IIC	Contractor	Prior to commencement of works	Demobilisation
Concrete Production	<ul style="list-style-type: none"> <li>Concrete production to be at least 100m from nearest water body.</li> <li>Concrete production to be at least 50m from foreshore vegetation.</li> <li>Concrete will be prepared on bunded and covered hard stand surface of laydown areas.</li> <li>Contractor to provide for their own freshwater needs (additional rainwater harvesting installed prior to commencement of works, or portable desalination plant to be used).</li> <li>All wastewater from concrete production will be collected and treated to lower the pH and allow particulates to settle out before being recycled for construction purposes.</li> </ul>	IIC	Contractor	Start of construction works	End of construction works
	<ul style="list-style-type: none"> <li>Treated and tested wastewater may be discharged for absorption into the ground. Discharge will be at a rate to allow absorption without causing surface flooding.</li> <li>Slurry from concrete production will be collected and treated. Treatment can vary depending on viscosity of slurry but can include the same measures described for treating concrete wastewater or can be by facilitating the solidification of the slurry to form a gel which can be stored and disposed of according to the Solid Waste Management Plan.</li> <li>Solid and cured concrete waste is considered safe to be reused by the community or the Government Routine Maintenance Infrastructure (GoRMI) for infrastructure maintenance.</li> <li>The Contractor's will have a spill response plan in place to manage accidental spills or leakages of concrete wastewater or slurry.</li> </ul>				
Demobilisation	<ul style="list-style-type: none"> <li>All residual material is to be removed unless specifically requested by the Marine Department.</li> <li>Site rehabilitation works of laydown site, stockpile site and laydown area to include scarifying soil and spreading vegetative material to assist with natural regeneration processes unless the area is required for community use.</li> </ul>	IIC	Contractor	End of construction works	Demobilisation

	<ul style="list-style-type: none"> <li>• Replant coconut and other site-specific trees.</li> <li>• Any excess stockpile materials will be stored at the. Queen Elizabeth II Park.</li> </ul>				
Health and Safety	<ul style="list-style-type: none"> <li>• Implement approved OHS Management Plan</li> <li>• Provide fully stocked first aid stations at each construction site with workers trained in emergency First Aid.</li> <li>• Provide appropriate Personal Protection Equipment (PPE) for all construction workers and ensure they are used.</li> <li>• Maintain daily contractor's diary and record any OHS accidents or incidents.</li> <li>• Include any OHS accidents or incidents in monthly report.</li> <li>• Report any serious accident or incident to Supervision Engineer.</li> <li>• Prohibit usage of drugs and alcohol on construction sites and undertake regular alcohol testing.</li> <li>• Install lights and cautionary signs in hazardous areas.</li> </ul>	IIC	Contractor	Prior to commencement of works	Demobilisation
Community Health and Safety	<ul style="list-style-type: none"> <li>• General public is not permitted in high-risk areas and where heavy machinery is in operation.</li> <li>• Ensure reversing signals are installed on construction vehicles or provide flagmen as required to ensure safe operations.</li> <li>• Mark dangerous areas with reflective tape or other hazardous areas during the hours of darkness.</li> <li>• Provide safe access around work sites to keep public away from harm. Use safety barriers and fences as required.</li> <li>• Effective traffic and road safety (traffic management plan as mentioned earlier).</li> <li>• Contractor shall rely on own freshwater production/supply and shall not use public freshwater resources (to protect water resources, particularly for vulnerable groups)</li> </ul>	IIC	Contractor	Start of construction works	Demobilisation
Community grievances	<ul style="list-style-type: none"> <li>• Implement Stakeholder Engagement and Consultation Plan</li> <li>• Noting requirements in section 4 of this ESMP to undertake a gap analysis and implement provisions of the MICRO 2 (P177100) SEP where there are gaps and as are relevant Funafuti Port works.</li> <li>• Maintain a grievance register.</li> <li>• Ensure that public consultation and disclosure communication is completed at regular intervals to ensure that the public are fully aware of the MICRO project program of activities and the GRM process.</li> <li>• Signage should be used in public areas around the MICRO project sites advising the complaints procedure and contact details of key project individuals responsible for responding to issues raised.</li> </ul>	IIC	Contractor (CLO)	Prior to commencement of works	Demobilisation
Labour Management	<ul style="list-style-type: none"> <li>• Adopt and implement all provisions of the MICRO 2 (P177100) Labour Management Procedure (LMP). This includes establishing a Workers Grievance Mechanism.</li> </ul>	IIC	Contractor	Prior to mobilisation	Prior to Construction starting
Chance Finds Procedures	<ul style="list-style-type: none"> <li>• Adopt and implement all provisions of the MICRO 2 (P177100) Chance Finds Procedures</li> </ul>	IIC	Contractor	Prior to mobilisation	Prior to Construction starting

### MICRO Project Investments Operational Mitigation Plan

Project Activities	Mitigation Measures	Cost	Responsibility	Start	End
Spill Response Planning	<ul style="list-style-type: none"> <li>The Port Authority will have a spill response plan in place to account for all potential instances.</li> <li>Spill response plan will be developed to ensure that all fuels and lubricants used during the operational phase in machinery, equipment, generators and also on marine vessels are contained, collected, treated, and disposed of.</li> <li>Under the requirements of the IFC EHS Guidelines for Ports, Harbours, and Terminals the spill response plan will:               <ul style="list-style-type: none"> <li>Identify areas within the port zone and nearby vicinity that are sensitive to spills and releases of hazardous materials and locations of any water intakes;</li> <li>Outline measures for managing spills, releases, and other pollution incidents, including reporting and alerting mechanisms to ensure any spillage is reported promptly to the port authority and Department of Environment;</li> <li>Include provision of specialized oil spill response equipment (e.g., containment booms, recovery devices, and oil recovery or dispersant application vessels, etc)</li> <li>Include regular training schedules and simulated spill incident and response exercise for response personnel in spill alert and reporting procedures, the deployment of spill control equipment, and the emergency care/treatment of people or wildlife impacted by the spill.</li> </ul> </li> </ul>	MPWIELMD Budget	MPWIELMD	Prior to handover of infrastructure	Ongoing
Erosion due to placement of new retaining seawall	<ul style="list-style-type: none"> <li>Initiate and implement periodic maintenance schedule to remove sand from harbour channel and basin and replace on beach.</li> <li>Carry out facility inspections after each tropical cyclone event.</li> </ul>	MPWIELMD Budget	MPWIELMD	Handover of infrastructure	Ongoing
Loading and unloading of cargo and passengers at wharf	<ul style="list-style-type: none"> <li>Carry out timely repairs to any erosion around wharf or jetty or damage to ancillary facilities.</li> <li>Ensure proper handling procedures for drums of hydrocarbons.</li> <li>Properly maintain crane truck and hydraulic systems.</li> <li>Clean up and safe disposal of any spillage on land</li> </ul>	MPWIELMD	MPWIELMD	Handover of infrastructure	Ongoing
Tidal area of jetty	<ul style="list-style-type: none"> <li>Initiate and implement regular maintenance schedule to remove algae from inter-tidal area of jetty to reduce slippery surface</li> </ul>	Kaupule	Kaupule	Handover of infrastructure	Ongoing

## Appendix B: Monitoring Plan

### Funafuti Port: Construction Phase Monitoring Plan

Impact Area:	Management Measures:	Frequency/Responsibility
Environmental and Social Impacts	<ul style="list-style-type: none"> <li>• Approved Solid Waste Management Plan effectively implemented</li> <li>• Waste collection at laydown area is secure, well signed, and clean</li> <li>• Hazardous waste is stored according to SWMP</li> <li>• Good housekeeping around project sites</li> <li>• All waste is disposed of offshore</li> </ul>	Weekly / Supervision Engineer
Solid and hazardous waste	<ul style="list-style-type: none"> <li>• Approved Solid Waste Management Plan in place</li> <li>• Waste collection at laydown area is secure, well signed, and clean</li> <li>• Waste collection storage arrangements in place and compliant with approved SWMP</li> </ul>	Weekly / Supervision Engineer
Community Health and Safety	<ul style="list-style-type: none"> <li>• HIV/GBV/Code of Conduct training acknowledgements have been conducted</li> <li>• Medical clearance certificates provided for all foreign workers</li> <li>• GRM process available for public inspection</li> <li>• CLO on site</li> <li>• Workers Management Plan contains all elements, has been approved by MPWIELMD and PMU</li> </ul>	Weekly / Supervision Engineer
Soil and Water Pollution	<ul style="list-style-type: none"> <li>• Appropriate spill response plan in place</li> </ul>	Weekly / Supervision Engineer
Occupational Health and Safety	<ul style="list-style-type: none"> <li>• OHS Management Plan contains all relevant elements and is approved</li> <li>• All workers have undergone appropriate OHS training</li> </ul>	Weekly / Supervision Engineer
Materials Supply	All imported materials with appropriate biosecurity clearances	Weekly / Supervision Engineer
Laydown and Stockpile Area	<ul style="list-style-type: none"> <li>• Laydown areas established on pre-approved sites as per C-ESMP</li> <li>• Water run off management systems in place to approved standard</li> </ul>	Weekly / Supervision Engineer
<b>Funafuti Port: Construction Phase Monitoring Plan</b>		
Impact Area:	Management Measures:	Frequency/Responsibility:
Solid and Hazardous Waste	<ul style="list-style-type: none"> <li>• Approved Solid Waste Management Plan effectively implemented</li> <li>• Waste collection at laydown area is secure, well signed, and clean</li> <li>• Hazardous waste is stored according to SWMP</li> <li>• Good housekeeping around project sites</li> <li>• All waste is disposed of offshore</li> </ul>	Weekly / Supervision Engineer
Public Health and Safety	<ul style="list-style-type: none"> <li>• Approved Traffic Management Plan is under effective implementation</li> <li>• Public signage of complaints procedure</li> </ul>	Weekly / Supervision Engineer

	<ul style="list-style-type: none"> <li>• Signs and fences restrict or direct pedestrians and public where appropriate.</li> </ul>	
Protection of Coastal Environment	<ul style="list-style-type: none"> <li>• No solid waste on beach</li> <li>• Bunding is in place and effective</li> </ul>	Weekly / Supervision Engineer
Soil and Water Pollution	<ul style="list-style-type: none"> <li>• Appropriate spill response plan/kit in place for waste area</li> <li>• No visible spills on soil or uncovered ground</li> <li>• Drainage, water treatment and soakage systems clear and fit for purpose</li> </ul>	Weekly / Supervision Engineer
Hazardous Substances Storage	<ul style="list-style-type: none"> <li>• Substances stored in self-bunded vessels or within bund on impermeable surface</li> <li>• Spill kit complete and accessible</li> <li>• Spill training completed</li> <li>• No evidence of spills on the ground</li> </ul>	Weekly / Supervision Engineer
Materials Supply	<ul style="list-style-type: none"> <li>• All imported materials with appropriate biosecurity clearances</li> </ul>	Weekly / Supervision Engineer
Laydown Area	<ul style="list-style-type: none"> <li>• Laydown areas established on pre-approved sites</li> <li>• Laydown areas dust levels managed efficiently</li> <li>• Traffic management plan correctly implemented at laydown site</li> <li>• Water run off management systems operating correctly</li> <li>• Dust management effectively implemented</li> <li>• PPE present and correctly used</li> </ul>	Weekly / Supervision Engineer
Solid and Hazardous Waste	<ul style="list-style-type: none"> <li>• Approved Solid Waste Management Plan effectively implemented</li> <li>• Waste collection at laydown area is secure, well signed, and clean</li> <li>• Hazardous waste is stored according to SWMP</li> <li>• Good housekeeping around project sites</li> <li>• All waste is disposed of offshore</li> </ul>	Weekly / Supervision Engineer

### Funafuti Port Operational Phase Monitoring Plan

Funafuti Port Operational Phase Monitoring		
Impact Area:	Management Measures:	Frequency/ Responsibility:
Solid Waste	Inspect beach and coastal area for solid waste	Weekly / MPWIELMD
Hazardous Substances	Inspect pavement for signs of oil or fuel spills	Weekly / MPWIELMD
Drainage	Inspect drainage and filtration for blockages or sediment build up	Monthly / MPWIELMD



## Appendix C: C-ESMP Contents

### Contractor's Environmental and Social Management Plan (C-ESMP)

#### Principles

- The C-ESMP is informed and based upon the Tuvalu law, the MICRO Project ESMP and IFC EHS Guidelines (Ports and Harbours).
- All commitments must be specific and auditable with measurable outcomes and clear timeframes.
- To ensure readability, write clearly and avoid long sentences with complex clauses.
- Always use the terms 'will' and 'must', rather than 'should' or 'may' when committing to carry out management actions.
- Avoid use of ambiguous terminology such as 'where possible', 'as required', 'to the greatest extent possible'. If it is necessary to include ambiguous terminology, it should be explained and examples given.
- Clearly explain any technical terms or acronyms used, and/or define them in a glossary.
- Commitments or statements within the management plan must be consistent with other relevant management plans or conditions of approval.

#### C-ESMP Content

##### 1. Declaration and Document Version Control

- Person accepting responsibility for the C-ESMP – signed declaration
- The document version control should be a simple system that ensures that details of all key changes to the document over time are properly recorded.

##### 2. Table of Contents

##### 3. Executive Summary

The executive summary should note the key elements of the work, the purpose of the document, the main potential impacts and the primary strategies planned to address these impacts.

##### 4. Project Description

The C-ESMP should provide a summary of the works, description of construction methodologies and identification of offsite areas such as selected quarries, identified haul routes, landfill or waste disposal sites as this provides context for the plan particularly where the information was not included in the ESMP. The location of all works actions as relates to this contract should be described with a clear definition of the works area of influence, with a map showing the various locations provided. Summary information on the environment at these locations should also be included as this helps provide the environmental context to which the C-ESMP applies. A schedule of intended commencement and completion dates should be provided. Projects undertaken in stages should identify each stage in the schedule.

##### 5. Objectives

The environmental outcomes of the plan should be defined. These should be tailored to the environmental issues outlined in the plan.

##### 6. Environmental Management Roles and Responsibilities

The plan should define the roles and responsibilities of personnel in charge of the environmental management of the works. The roles and responsibilities of each relevant position should be documented, including the responsibilities of any subcontractors. The names of the responsible personnel do not need to be included. Identification of the position titles, roles and responsibilities is sufficient. If the roles and responsibilities are expected to change over time the long-term variations should also be documented.

##### 7. Reporting

The description of reporting requirements should include:

- a list of required reports including where appropriate monitoring, environmental incidents, non-compliance, corrective action, and auditing
- a description of the standard report content
- the schedule or triggers for preparing a report
- who the report is provided to
- document control procedures

## 7. Environmental Training

All people involved with the works should receive relevant environmental training to ensure they understand their responsibilities when implementing the C-ESMP. People to be trained include those at the site/s of all project activities and operations, including contractors, subcontractors, and visitors. The training should be tailored to the role of the individual in the project.

The C-ESMP should describe the training to be implemented and could include:

- site inductions
- identification of key points of environmental value and any relevant matters of national environmental significance
- understanding the requirements of the C-ESMP and the individual's role
- environmental incident emergency response procedures
- site environmental controls
- an outline of the potential consequences of not meeting their environmental responsibilities.

Records of all training conducted should be maintained and include:

- the person receiving the training
- the date the training was received
- the name of the person conducting the training
- a summary of the training.

## 9. Emergency Contacts and Procedures

The C-ESMP should identify the key emergency contacts responsible for managing environmental emergencies associated with the project and their contact details. These personnel should have the power to stop and direct works so that they can manage emergencies effectively. In addition, the plan should establish procedures for managing environmental emergencies and ensure that those procedures are implemented and maintained.

The C-ESMP should also detail the Contractor's contingency plan for extreme weather events, medical emergencies, and other rapid response situations.

## 10. Mitigation Measures

The C-ESMP should clearly state how the potential impacts of the proposal will be implemented and managed based on the stipulations in the ESMP and this information usually forms the bulk of the content of the plan. For each potential impact the plan should address specific measures that will be taken including:

- Summary of mitigation measures as related to the works and the ESMP
- Additional mitigation measures to be implemented specifically in relation to identified offsite locations
- monitoring programs with trigger values for corrective actions
- corrective actions and non-compliance reporting
- environmental schedules.

**Sub-plans:** The C-ESMP should also include all required sub-plans (Solid and Hazardous Waste

Management, Traffic Management Plan, Operational Health and Safety Plan, Worker Management Plan (with Code of Conduct), the Prevention of GBV and HIV/AIDS Action Plan, Invasive Species Plan, Water (Quality) Management Plan, Spill Response Plan, Algal Growth Management, Chance Find Procedures, Construction Monitoring Plan, Operational Monitoring Plan, and LMP with a workers' GRM) as an annex to the C-ESMP.

## **11. Audit and updates**

### ***Environmental auditing***

The C-ESMP should include the schedule or triggers for auditing the implementation and effectiveness of the plan. It should address both internal and external audit requirements including who is responsible for undertaking the audits and reporting the results.

### ***C-ESMP update***

The environmental management plan should specify the schedule or triggers for updates of the plan. An update is required whenever there is a change to the scope of the works or construction methodology that changes the projects area of impact or brings about a change that would be of public interest to know. The plan should also identify who will be responsible for undertaking the update.

## Appendix D: Solid Waste Management Plan Guidelines

The key objectives of this Solid Waste Management Plan (WMP) guidelines are to assist the Contractor to develop a SWMP that:

- i. Maximise the amount of material, which is sent for reuse, recycling, or reprocessing
- ii. Minimise the amount of material sent to the landfill
- iii. Satisfies the national waste management legislations
- iv. Satisfies the EHS requirements of the World Bank

The SWMP requirements set that at a minimum:

- i. No Tuvalu landfills are to be used for any waste. All waste is to be recycled or disposed of offshore at a permitted facility.
- ii. No dumping of any waste in Tuvalu.
- iii. Compliance with Waigani Convention and any other relevant international conventions for export of hazardous and non-hazardous waste.
- iv. Identify and utilise suitable local recycling and reuse options.
- v. Hazardous wastes such as old oil and fuel shall be collected and stored in self-bunded containers. Containers shall be stored in a bunded covered area approved by the WMD prior to collection for overseas disposal.
- vi. Difficult waste shall be stored in a secure fenced and covered area.

In addition to this, it is a requirement that best practices are implemented through the SWMP. These include:

- i. Segregation of waste;
- ii. Secure storage for waste;
- iii. Adopting waste hierarchy: (i) avoid, (ii) reduce, (iii) reuse, (iv) recycle;
- iv. Collaborating with other sectors, waste generators and government department for cumulative benefit;
- v. Consultation with the Department of Waste Management and Port Authority to separate appropriate food scraps for livestock feed.

### SWMP Content Requirements

1. Waste streams: identify which waste streams are likely to be generated and estimate the approximate amounts of materials. Solid waste streams include:
  - General waste (i.e., office type waste, household waste (from any workers camps), lightweight packaging materials).
  - Recyclable waste (i.e., certain plastics, metals, rubber etc. that can be recycled).
  - Organic biodegradable waste (i.e., waste that will decay / break down in a reasonable amount of time, such as green waste, food waste).
  - Inorganic non-recyclable waste (i.e., waste that cannot decompose / break down and which cannot be recycled).
  - Hazardous waste (i.e., asbestos, waste oil etc.)

Undertake inventory of materials that can be reused, recycled, or recovered from the construction site:

- Specific types of materials: a template assessment table below
- Amount of material expected
- Possible contamination by hazardous materials like asbestos or lead: these materials will limit reuse/recycling options and require special disposal.



- Aesthetics: ensure that the site appears orderly and will not raise concern from local residents or businesses – for example screening for dust and litter containment and daily collection of windblown material
  - Establish a collection/delivery plan in collaboration with waste contractors for waste and recyclable materials generated on-site.
4. Clearly assign and communicate responsibilities: ensure those involved in the project are aware of their responsibilities in relation to the construction waste management plan.
  5. Training: be clear about how the various elements of the WMP will be implemented.
  6. Monitor: to ensure the plan is being implemented, monitor on-site as per the PESMP monitoring plan.

## Appendix E: Worker Camp Management Plan Guidelines

### Maritime Investments in Climate Resilient Operations (MICRO)

#### Worker Planning and Management Guidelines

##### GENERAL

The Workers Camp Management Plan will be compliant with the specific prescriptions of the ESIA.

##### OBJECTIVES

To provide guidelines on the recruitment of workers and the selection, development, management, maintenance, and restoration of workers accommodation camp sites in order to avoid or mitigate against significant adverse environmental and social effects, both transient and permanent.

##### WORKER RECRUITMENT

The Contractor is required to minimise the number of skilled workers that are recruited from overseas. No unskilled labour will be sourced from overseas. The Contractor will maximise the number of skilled and unskilled workers that are recruited from the community's labour force in Funafuti.

The Contractor will be required to provide justification for any skilled workers that the wish to recruit from overseas and explain why this position cannot be filled locally on Funafuti.

##### WORKERS CAMP FACILITIES

All facilities in the Workers Camp must be compliant with the stipulations of the ESIA and the IFC Workers Accommodations and Standards. The camp shall be provided with the following minimum facilities:

- Canteen, dining hall and dormitories as required shall be constructed of suitable materials to provide a safe healthy environment for the workforce and which facilitate regular cleaning and the provision of ventilation and illumination.
- Ablution block with a minimum of one water closet toilet, one urinal and one shower per 10 personnel engaged either permanently or temporarily on the project. Separate toilet and wash facilities shall be provided for male and female employees.
- A sick bay and first aid station.
- Sewage collection facilities to allow for the treatment of black and grey wastewater discharge from toilets, washrooms, showers, kitchens, laundry and the like. The management of all camp wastewater water shall be as prescribed in the PESMP.
- All camp facilities shall be maintained in a safe clean and or appropriate condition throughout the construction period.
- The contractor shall provide, equip, and maintain adequate first aid stations and erect conspicuous notice boards directing where these are situated and provide all required transport. The contractor shall comply with the government medical or labour requirements at all times and provide, equip and maintain dressing stations where directed and at all times have experienced first aid personnel available throughout the works for attending injuries.
- Throughout the period of the contract the employer, the engineer, or their representatives shall have uninterrupted access to and from the camp for the purpose of carrying out routine inspections of all buildings, facilities, or installations of whatever nature to ensure compliance with this specification.

#### **WORKERS CAMP OPERATIONS**

- The Contractor will be required to provide calculations of the amount of freshwater needed for the number of workers accommodated at the camp and is to demonstrate how they will provide this water. No currently existing freshwater resources will be used for the workers or for worker camp operations.
- The Contractor will be required to provide adequate provisions for the workers for the duration of the project so as not to deplete the available food sources for the community.
- All wastewater, solid waste, freshwater usage, noise levels, handling and storage of hazardous materials shall be as prescribed in the PESMP.

#### **MANAGEMENT OF OFF DUTY WORKERS**

- The Contractor to adopt the specific Code of Conduct to describe the expected behaviours of their project worker in relation to the local communities and their social sensitivities.
- The Contractor is to ensure that all overseas project staff undergo a cultural familiarisation session as part of their induction training. The purpose of this induction will be to introduce the project staff to the cultural sensitivities of the local communities and the expected behaviours of the staff in their interactions with these communities. The MICRO PMU shall provide to the Contractor a list of approved service providers which shall include recognized NGOs and others for conducting this training.
- The Contractor is to stipulate the conditions under which visitors may attend the workers camp. Strict visiting hours should be enforced and all visitors will be required to sign in and out of the worker's camp.
- The Contractor shall ensure that basic social/collective rest spaces are provided equipped with seating within the Workers Camp to help minimise the impact that the workers would have on the leisure and recreational facilities of the nearby communities. Provisions should also be made to provide the workers with an active recreation space within the camp.

#### **WORKERS CAMP MANAGEMENT PLAN**

A Workers Camp Management Plan shall be submitted as an annex to the CEMSP. The Workers Camp Management Plan shall describe how this document, the ESIA and the IFC Guidelines shall be implemented in the following:

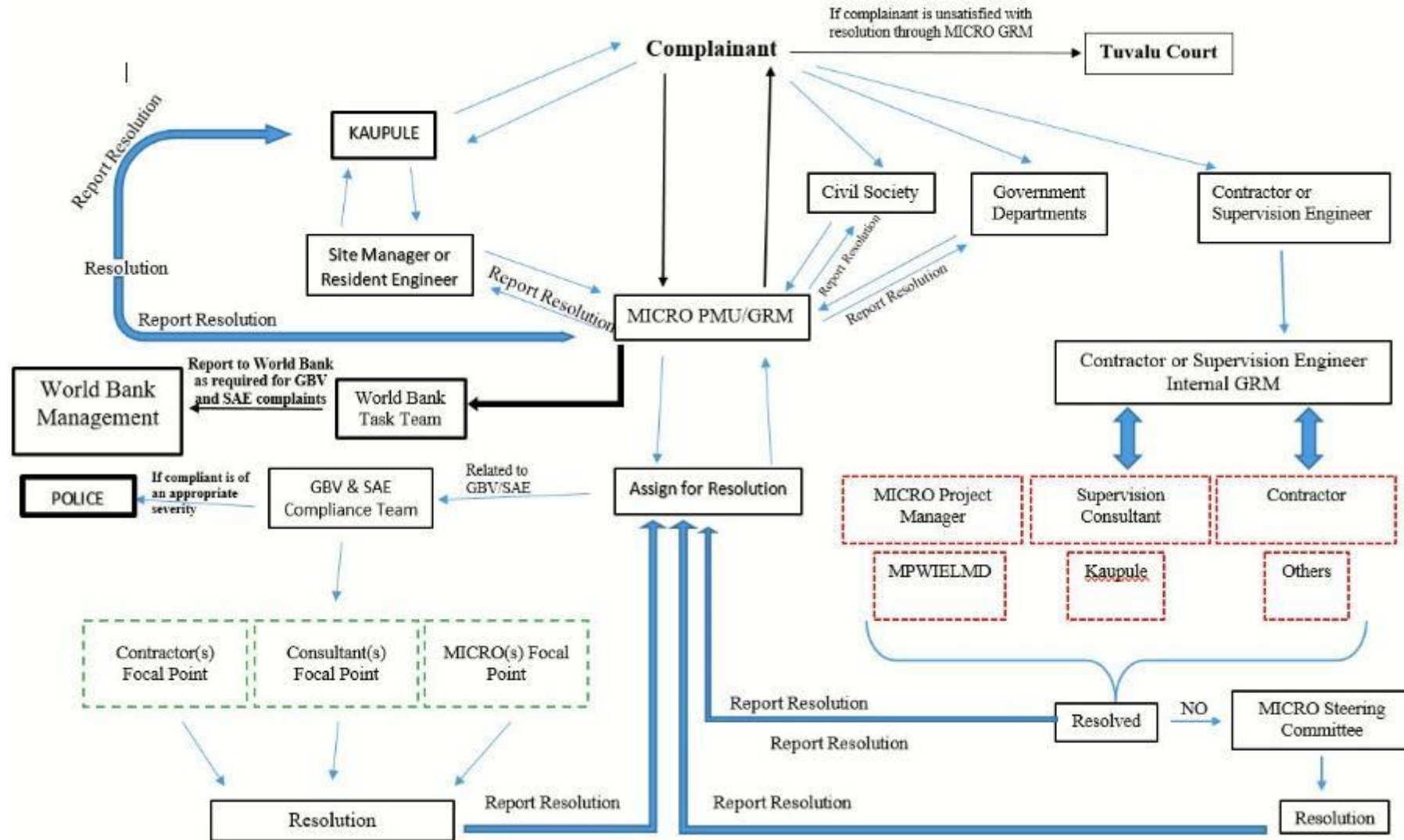
- Recruitment strategy
- Accommodation
- Canteen and dining areas
- Ablutions
- Water supply
- Wastewater management system
- Proposed power supply
- Full Code of Conduct for Workers
- Recreational/leisure facilities for workers
- Visitors to the Workers Camp
- Interactions with the local communities



## Appendix F: Funafuti Labour Registry

Company Register				
Contact Details				
Company Name	Address	Contact Person	Mobile, Phone, Fax & Email	Type of works
Rental Accommodation	Fakaofo	Pavli Teava	20 217/ 28 051 <a href="mailto:militane@gmail.com">militane@gmail.com</a>	Accommodation
Tuvalu Shipping/ Su's Place Accommodation	Alapi	Tafaaki Semu	20 908 <a href="mailto:tuvalushipping@gmail.com">tuvalushipping@gmail.com</a>	Local Consultation, Office Administration/Clerical, food preparation/ catering, importer, supplier, delivery (courier services), laundry, cleaning services, labour supply/ human resources, accommodation, immigration services, transaction services.
Sikiliti Poulasi	Kavataotea	Sikiliti Poulasi	20 263 <a href="mailto:spatolo@yahoo.com">spatolo@yahoo.com</a> / <a href="mailto:spatouia@gmail.com">spatouia@gmail.com</a>	Transport (rental motorbikes), Accommodations
LA Electrical & Air Condition Services	Sevaga	Tomasi Tomatou	20 139 <a href="mailto:kerianster@gmail.com">kerianster@gmail.com</a>	Electrical/ mechanical (incl. AC), plumbing/ drainage, painting/ decorating, labour supply/ human resources, transaction services
Asian Motorcycle Distributor	Sevaga	Andrew Iantana	20 902	Custom brokerage
Rental Accommodation	Fakaofo	Solofa Uata	20 070 <a href="mailto:solofauata@gmail.com">solofauata@gmail.com</a>	Accommodations
Sulani General Merchandise	Ivavau	Polau Kafe	20 471	Importer Supplier, Others
Filamona Lodge	Vaiaku	Peniel Metia	20 833 <a href="mailto:The.filamonalodge@yahoo.com">The.filamonalodge@yahoo.com</a>	Food preparations/ catering, Accommodations
Tivoli Apartment	Fakaofo	Eunike Tonise	20 693 <a href="mailto:Eunike.tonise@gmail.com">Eunike.tonise@gmail.com</a>	Office Administration/clerical, Accommodations
Maleana Feli	Vaiaku	Maleana Feli	901 791	Laundry & or Cleaning Services
Lilian L Fuitau	Fakaofo	Lilian Fuitau	20 606 <a href="mailto:liliaction@gmail.com">liliaction@gmail.com</a>	Transport Hire Rental services (motorbikes)
HAÁPAI	Alapi	Karua Isaako	20 444 <a href="mailto:kapuaisaako@gmail.com">kapuaisaako@gmail.com</a>	Personal Transportation (Bus, taxi, van), Transport Hire/ rental

Appendix G: MICRO GRM Flowchart



Appendix H: IFC Workers Accommodation Standards and Guidelines

# Workers' accommodation: processes and standards

A guidance note by IFC and the EBRD

The EBRD is an international financial institution that supports projects from central Europe to central Asia. Investing primarily in private sector clients whose needs cannot be fully met by the market, we foster transition towards open and democratic market economies. In all our operations we follow the highest standards of corporate governance and sustainable development.

IFC, a member of the World Bank Group, creates opportunity for people to escape poverty and improve their lives. We foster sustainable economic growth in developing countries by supporting private sector development, mobilising private capital, and providing advisory and risk mitigation services to businesses and governments. Our new investments totalled US\$ 15 billion in fiscal 2009, helping play a prominent role in addressing the financial crisis. For more information, visit [www.ifc.org](http://www.ifc.org).

## About this guidance note

This Guidance Note is aimed at providing practical guidance to IFC and EBRD specialists, consultants and clients on the processes and standards that should be applied to the provision of workers' accommodation in relation to projects funded by IFC or the EBRD. Applying appropriate standards to the construction and operation of worker housing falls within the performance requirements on labour and working conditions expected of clients by both institutions. The Guidance Note also provides examples of good practice approaches that businesses have successfully applied in their operations. IFC and the EBRD have not financed all the projects or companies mentioned in the Note. Some of the information in the Note originates from publicly available sources such as company web sites. IFC and the EBRD have not verified the accuracy of such information nor the companies' practices. This Guidance Note is not intended to establish policy itself; and any issues arising in an IFC- or EBRD-financed project will be assessed and addressed in the context of the particular circumstances of that project. The EBRD and IFC recognise that there are no comprehensive international regulations relating to workers' accommodation, and that good and best practices are constantly evolving. The EBRD and IFC intend to update this Guidance Note to reflect such developments, and would welcome feedback and comments from users to contribute to this process. Comments should be sent to [environmentalandsocial@ebrd.com](mailto:environmentalandsocial@ebrd.com) and [asksustainability@ifc.org](mailto:asksustainability@ifc.org)

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# Workers' accommodation: processes and standards

Public guidance note by IFC and the EBRD

## EXECUTIVE SUMMARY

This guidance note addresses the processes and standards that should be applied to the provision of workers' accommodation in relation to projects funded by the EBRD or IFC. Applying appropriate standards to the construction and operation of worker housing falls within the performance requirements on labour issues expected of clients by both organisations.

There is a range of different types of workers' accommodation that may be required by various projects and at different stages within projects, including temporary exploration camps, construction camps and permanent dormitories. Specific issues arise in relation to each of these. This note reviews various international, national, private sector and public sector standards and guidance that are more generally applicable. In some cases clear standards or good practice have been identified.

In others, we present a range of standards that provide some flexibility and adaptability within the local context. In these cases, compliance with at least the minimum standard is expected.

Issues for consideration are organised in terms of a staged process to be undertaken in planning, constructing, and then operating worker housing facilities. These issues may be relevant to the direct client or to (sub)contractors undertaking particular elements of a project, such as construction or management of facilities.

In cases where contractors are used, it is important to set up appropriate mechanisms and processes (reporting/monitoring) to ensure that performance requirements are complied with.

At the initial stage of any project, there is a need to assess whether accommodation for workers is

required, and if so, whether this can be provided within existing local communities or whether new facilities should be constructed. The likely impact on local communities and the housing market of either option should be assessed.

Before constructing any facilities, other potential impacts should be evaluated. These may include the impact of construction, and the effect of a new housed labour force on community services, such as health, and on community cohesion and safety. These assessments should form part of a project's Environmental and Social Impact Assessment.

The next step is to consider the standards to be applied for the location, arrangement, and construction of any facilities. Issues here include consideration of a safe and healthy location, application of appropriate construction standards, provision of adequate and sanitary living conditions and provision of appropriate leisure and health facilities.

There are no universally applicable international regulations relating to workers' accommodation standards in general. However, there are some international standards/guidance on food safety, water sanitation and waste management that should be applied, and national or local building regulations that must be complied with.

Lastly, when the accommodation has been completed, there are issues around its operation and management. These include the type of staff who will manage it, development of appropriate management policies, such as security and grievance procedures, and ongoing liaison with local communities. All such policies should be subject to regular review.

*for charging for accommodation; the provision of minimum amounts of space for each worker; provision of sanitary, laundry and cooking facilities*

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## INTRODUCTION

This guidance note looks at the provision of housing or accommodation for workers by employers and the issues that arise from the planning, construction, and management of such facilities.

Generally, workers are housed by their employers in cases where, either the number or the type of workers required cannot be sourced from or accommodated within local communities. Thus, provision of workers' accommodation is often associated with the importation of an external workforce into an area. This can occur because the local labour supply or skills base is inadequate, because the workers are simply not available due to the remote location of the worksite or the particular skills required or because labour requirements can only be satisfied by migrant workers due to the nature of the work or the working conditions.

Provision of worker housing may relate to a temporary phase of a project (for example an exploration or construction camp) or may be more permanent (for example a factory dormitory or plantation camp). Depending on the type of accommodation, there are a range of considerations relating to both the living conditions of the workers themselves, and to the impact that workers' housing facilities may have on surrounding communities. The provision of workers' accommodation is a frequent component of large-scale projects funded by institutions such as the EBRD or IFC.

This note is aimed at providing practical guidance to IFC and EBRD specialists, consultants and clients on appropriate policies and standards relating to workers' accommodation. Both the EBRD and IFC apply environmental and social performance standards in relation to their investments that include provisions on labour and working conditions. The EBRD has included a specific provision in its *Environmental and Social Policy* addressing workers' accommodation; paragraph 16 of *Performance Requirement 2 (PR2)* stipulates:

*Where a client provides accommodation for workers, the accommodation shall be appropriate for its location and be clean, safe and, at a minimum, meet the basic needs of workers. In particular, the provision of accommodation shall meet national legislation and international good practice in relation, but not restricted, to the following: the practice*

*and potable water; the location of accommodation in relation to the workplace; any health, fire safety or other hazards or disturbances and local facilities; the provision of first aid and medical facilities; and heating and ventilation. Workers' freedom of movement to and from the employer-provided accommodation shall not be unduly restricted.*

IFC Performance Standard 2 (PS2) aims to promote “safe and healthy working conditions, and to protect and promote the health of workers.” Arguably these covers living conditions as well when these are the responsibility of employers. *IFC Guidance Note 2 on Labour and Working Conditions* specifically mentions the potential danger of forced labour when housing is provided to workers in lieu of payment or where inappropriate charges for housing are levied.

In some instances, for example during construction phases of projects, workers will not be directly engaged by the EBRD's or IFC's clients, but by (sub)contractors. However, both the EBRD and IFC require their clients to ensure that non-employee

#### Box 1 - Construction camp built and operated by a Chinese contractor

This example illustrates the different mechanisms and processes which can be set up in order to ensure that workers' accommodation standards are being implemented by contractors.

Antea, a Greek client of the EBRD and IFC, and a subsidiary of Titan Cement Co, has contracted out the construction of a cement factory in Albania to a Chinese contractor. The construction involves bringing in 700 migrant workers and housing them in workers' accommodation. As part of the contract with the construction company, Antea has included a Code of Conduct and specific language referring to compliance with national labour law, ILO conventions and IFC PS2 and has developed a supervision and monitoring plan (including safety and labour audits) to ensure the construction company is in compliance with all requirements stated in PS2, that living conditions in particular comply with the guidance provided by the EBRD/ IFC and that all conditions enhance a safe and good working and living environment. Safety training courses and integration of best practices in accident prevention have been instigated, while solid waste and wastewater generated in the camp is managed in accordance with Albanian regulations and IFC/EBRD guidelines.

workers, engaged by contractors or other intermediaries to work on a project site to perform work related to the core function of the project, are covered by most of the provisions within PS2 and PR2, including (in the EBRD's case) paragraph 16 on workers' accommodation. To this end, clients should set up mechanisms and processes to ensure that contractors and other intermediaries comply with the EBRD's/IFC's standards. This should involve including contractual covenants related to workers' accommodation standards, reviewing contractor agreements, implementing reporting mechanisms and monitoring the implementation of workers' accommodation standards.

### A process approach

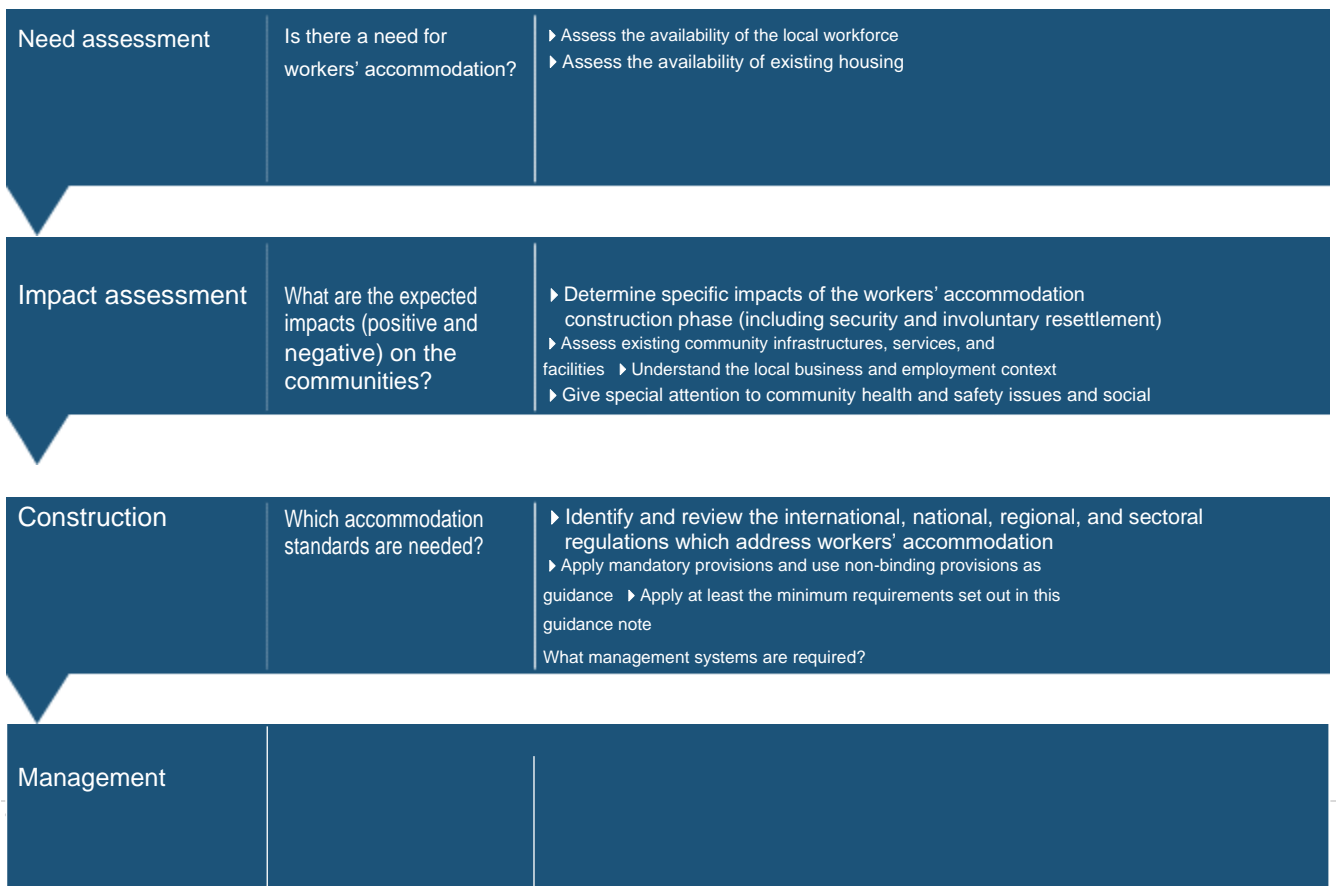
There are several stages to the process of addressing issues raised by workers' accommodation. These are:

- „ assessing whether housing is needed for the project and if so, what sort
- „ assessing impacts on local communities and planning mitigation of potential negative impacts
- „ awareness of the national and local regulatory framework

- „ determining the standards to apply to the location of facilities, the construction of housing and provision of facilities
- „ managing accommodation.

There are no comprehensive international regulations relating to workers' accommodation. However, there are legal and regulatory instruments and guidance that relate to particular aspects of the provision of worker housing.<sup>1</sup> This guidance note is based on a review of these instruments and legislation, as well as guidelines and best practices produced by a range of different private and public sector actions at national and international level. As such, the processes and standards cited often represent a range of acceptable practice. Those correspond to the Benchmark paragraphs under each section. The particular standard to be applied will depend on criteria such as the type of project, location, climate, and length of project. In all cases at least the minimum standard included in a given range should be applied. However, depending on the particular circumstances the minimum standard may not always be acceptable, in which case the EBRD/IFC will agree an appropriate higher standard with the client, based on the environmental and social due diligence.

Figure 1: Workers' accommodation, assessment, and management process





1. See footnotes under Part I, introductory remark

## PART I: PLANNING AND ASSESSING REQUIREMENTS FOR WORKERS' ACCOMMODATION

In considering worker housing, it is important to first be aware of the international, national, and local regulatory framework. At a general level, several international instruments recognise a right to an adequate standard of housing for everyone or for specific categories of the population as part of respecting human rights.<sup>2</sup> To ensure the full realisation of this right, binding instruments generally require the State to take appropriate steps and measures. For workers, the recognition of such a right has been included in ILO Conventions and Recommendations

for both Plantations and for Safety and Health in Agriculture, and in the ILO Recommendation 115 on Workers' Housing (1961) in particular. Although the latter is a non-binding recommendation providing guidance on policy, legislation, and practice to the State and to the national authorities in charge of housing in particular, it offers useful guidance on what is expected from employers who provide housing to their employees, and it specifies a number of housing standards (See Box 2).

### Box 2 - ILO Workers' Housing Recommendation 115

- „ It is generally not desirable for employers to provide housing for their workers directly and employers should use alternatives where possible. If there are no alternatives, specific attention should be paid to renting arrangements, workers' rights, and housing standards. In addition, the possibility of worker-occupants acquiring, for a fair price, ownership of housing provided by the employer should also be examined.
- „ Renting arrangements should be fair. Adequate and decent housing should not cost the worker more than a reasonable proportion of their income and should never include a speculative profit.
- „ The employer should be entitled to repossess the accommodation within a reasonable time in the event of termination of the worker's contract of employment and the worker should be entitled to a reasonable period of continued occupancy and/or fair compensation when he ceases to exercise his employment.
- „ During the time workers spend in the workers' accommodation they should enjoy their fundamental human rights and freedom of association in particular. Workers' accommodation arrangements should not restrict workers' rights and freedoms.
- „ Housing standards should include special attention to the following:
  - minimum space allocated per person or per family (floor area; cubic volume; or size and number of rooms)
  - supply of safe water in the workers' dwelling in such quantities as to provide for all personal and household uses
  - adequate sewage and garbage disposal systems
  - appropriate protection against heat, cold, damp, noise, fire, and disease-carrying animals, and, in particular, insects
  - adequate sanitary and washing facilities, ventilation, cooking and storage facilities and natural and artificial lighting
  - a minimum degree of privacy both between individual persons within the household and for the members of the household against undue disturbance by external factors
  - the suitable separation of rooms devoted to living purposes from quarters for animals.
- „ Where accommodations are provided for single workers or workers separated from their families, additional housing standards should be considered:
  - a separate bed for each worker
  - separate gender accommodation
  - adequate sanitary conveniences
  - common dining rooms, canteens, rest and recreation rooms and health facilities, where not otherwise available in the community.

2. See for example  
1948 Universal Declaration of Human Rights (Article 25)  
1965 Convention on the elimination of all forms of racial discrimination (Article 5)  
1966 International Covenant on Economic, Social and Cultural Rights (Article 11.1)  
1979 Convention on the elimination of all forms of discrimination against women (Article 14.2)

At a national or regional level, regulations tend to contain only general provisions requiring employers to provide a decent standard of accommodation to workers. However, in some jurisdictions there are detailed regulations or standards setting out a comprehensive framework to be applied.<sup>3</sup> There may also be building regulations relating to issues such as sanitation, safety or building materials that must be adhered to. Therefore, national regulations and standards are the first place to look when determining the necessary standards for living facilities. However, responsibility for planning and building standards may well lie with regional or local levels of government, so it is important that these local authorities are consulted. Provisions on workers' accommodation can also be found in policy, guidelines or codes of practice adopted by a wide variety of actors such as international bodies, industry associations, national, regional, or local authorities.<sup>4</sup> Compliance with national and local law is the basic and essential requirement.

### Benchmarks

1. The international/national/local regulatory frameworks on workers' accommodation have been reviewed.
2. Identified mandatory provisions on workers' accommodation are implemented thoroughly.

## I. Assessing the need for workers' accommodation

Before building and running workers' accommodation, it is important to understand the local housing and labour markets and the potential effects the building of new facilities may have on the surrounding communities.

### A. Availability of workforce

At the initial scoping phase of a project, it is important to consider whether workers' accommodation is needed at all. In this respect, it is worth analysing the project's workforce requirements including skills and likely numbers over the project cycle and to assess the capacity of the local population to meet those workforce requirements either from its current base or as a result of training. It is preferable to source labour from the local communities as this has many

as it will increase the direct and indirect benefits to the community arising from the project. This approach is strongly supported by the EBRD and IFC. Any national/local requirements to promote local employment opportunities must also be taken into account. It should be noted that even in the absence of such requirements, new recruitment on EBRD/ IFC-financed projects must not be discriminatory.

### Benchmarks

1. There has been an assessment of workers' availability in the neighbouring communities.
2. There has been an assessment of the skills and competencies of the local workforce and how those skills and competencies fit the project needs.
3. There has been an assessment of opportunities to train the local workforce to fulfil the project's needs.

advantages; not only in terms of reducing the need for workers' accommodation, but also

3. See for example:  
United States - Occupational Health and Safety Act (Standards 29, paragraph 1910.142)  
Brazil - Health and safety regulation in the agricultural, livestock farming, forestry, and aquaculture sectors, 2005  
Malaysia - Workers' minimum standards of housing and amenities Act, 1990  
South Africa - Basic condition of employment Act, 1997  
New South Wales, Australia - Rural Workers Accommodation Act, 1969  
Western Australia - Construction camp regulations, 1970  
Dubai Municipality - Labour camp specifications (last updated in 2007)

## B. Availability of existing housing

If local workers are unavailable or not sufficiently skilled, the question arises of whether external workers can be accommodated within the existing local housing capacity or whether new facilities are needed. In general, the decision to utilise host-community accommodation or to develop on-site accommodation will be based on factors such as whether project development is occurring near to larger, established population centres and on the capacity of any nearby communities, quality of housing stock and the capacity of the environment to assimilate a new workforce.

If existing capacity is available, in the form, for example, of lodging with local families, hotels, hostels or rented housing, the impact on the local communities and housing market should be assessed. Such off-site housing may create a wide range of economic opportunities such as rental income for local people or development of local businesses (shops and restaurants for instance), which are positive project impacts, and may also result in improvements to existing housing stock. However, off-site housing may also be associated with a range of adverse social impacts including increased demands on infrastructure, services and utilities, development of illicit trade activities (drugs, prostitution, selling of stolen goods) and inflation in local rent and other subsistence items with detrimental

4. See for example:  
New South Wales, Australia - Accommodation for rural agricultural work, code of practice, 2006  
Singapore - Code of practice on environmental health, 2005  
Israel - Guide for Migrant Workers, Housing ILO - Code of Practice, safety, and health in forestry work, 1998  
City of Geraldton-Greenough, Western Australia, Local planning policy - Temporary accommodation camps, 2006  
Sustainable Agriculture Network Standards, 5.14, 2009.

consequences for the local population. If a project anticipates that the workforce is to be resident within the local communities it is good practice to provide financing options for local residents to develop and/or improve hostels for instance.

Conversely, to provide on-site housing opportunities minimises workforce-host community interactions and reduces the pressure on existing infrastructures and can also pre-empt the development of various external activities such as prostitution.

In some cases, it may be feasible and beneficial to offer workers or certain categories of workers an option between self-accommodation and company-provided accommodation with varying compensation accordingly.

To avoid or mitigate the most negative impacts, it is important to conduct a comprehensive assessment of the housing market and the likely impact of the various options for workers' accommodation. For larger projects, this assessment will best be done at the stage of the Environmental and Social Impact Assessment (ESIA). Measures resulting from this assessment will need to be incorporated in tendering and contracting documentation. Furthermore, in cases where local facilities are utilised, potential mitigation measures for adverse impacts such as increased inflationary rates on local costs must be assessed in the ESIA, and procedures that will be implemented to monitor this must also be presented.

### Benchmarks

1. Prior to building any workers' accommodation, a comprehensive assessment of the local housing market has been conducted and the different types of housing available in the surrounding communities have been identified. For larger projects this assessment has been conducted at the stage of the project's Environmental and Social Impact Assessment.
2. There has been an assessment on communities of the impact of using existing housing opportunities.
3. Measures to mitigate adverse impacts on the local housing market have been identified and included in the Environmental and Social Action Plan (ESAP) or other relevant action plan.

## II. Assessing impacts of workers' accommodation on communities

Where the need to provide new workers' accommodation is identified, it is important to consider how this will impact on the surrounding communities. This may be relevant both to the construction phase of the camp (or other accommodation) and during its operation. Risk identification and assessments specific to the workers' accommodation should be undertaken as part of the Environmental and Social Impact Assessment and any related development of an Environmental and Social Action Plan. This assessment can also be used to determine whether contact between non-local workforce and local communities should be encouraged or minimised.

### Box 3 - Singapore National Environment Agency - Code of Practice on Environmental Health, 2005

The following guidelines shall be used for stand-alone dormitories.

- „ If the dormitory does not provide a separate space for cupboards/locker rooms, the minimum room space shall be 4 square metres per person (assuming a height of 2.4m).
- „ If the dormitory provides a separate space for cupboards/locker rooms, the minimum room space shall be 3 square metres per person (assuming a height of 2.4m).
- „ The room shall be adequately ventilated and lit. „ Adequate number of toilets and sanitary fittings shall be provided (1 toilet, 1 hand wash basin, 1 urinal and 1 bathroom with bench per 15 male workers).
- „ Where cooking area is to be provided in the dormitories, such provisions shall be in accordance with the requirements stipulated under Section 2.4 of the latest edition of Singapore Standard CP 102.

The above Singapore guidelines are mentioned as an example of "soft" regulations only. The standards described above may be inappropriate in different environments. Other standards apply in other countries.

## A. Specific impacts during the construction phase

The construction of workers' accommodation and its potential impacts on communities should be managed in the same way as for construction of the project itself. Impacts need to be identified and may include health and safety, disturbance issues arising from construction, including traffic (dust, noise, and vibration), and involuntary resettlement issues (including physical and economical displacement) when the erecting of workers' accommodation entails land acquisition.

## B. Community infrastructure

Workers' influx in the vicinity of a community may strain existing infrastructure, in particular the water and sanitation, electricity and transport systems. Impacts of the worker facility should be avoided or mitigated, and included within the assessment of the overall project.

In general, where facilities are developed close to local communities it is important to provide adequate transport systems to preserve the right of workers' freedom of movement if they are not to become effectively "trapped". This should be balanced against the need to prevent any unnecessary disruption of and/or to the local communities. Therefore, it may be appropriate to limit worker movements, but any restriction should be clearly justified by the need to avoid the disruption of local communities, in particular local communities' transport infrastructures – and to provide maximum security and safety to both workers and communities (see PART II, Section E "Workers' rights, rules and regulations on workers' accommodation", below at page 21).

## C. Community services and facilities

Depending on the size of the workers' accommodation, conditions of engagement (accompanied or unaccompanied) and the level of services offered to those workers, it may be necessary to assess the impact of workers on local medical, social, educational, and recreational services and facilities, potentially to the detriment of nearby communities. It must be ensured that such services and facilities can meet increased demand. If not, services must be available to the workers on site.

## D. Local businesses and local employment

Local businesses such as shops, restaurants or bars are likely to benefit from their proximity to workers' living facilities. However, there may also be negative issues that need to be managed such as increases in local prices, crime, prostitution, or alcohol consumption (see below Part II, section E).

## E. Community health and safety

The presence of a large number of workers, principally males, can give rise to an increased spread of communicable diseases such as HIV/AIDS in particular and other sexually transmitted diseases. In addition, special attention should be paid to risks such as road accidents, and other detrimental consequences of increased traffic generated by the project (dust, noise, and pollution). If the proposed project has major-accident hazards associated with it, emergency response and evacuation plans in accordance to PS4/PR4 will also need to be in place.

## F. Community cohesion

The impact of the presence of workers with different lifestyles or cultural backgrounds on the host community needs to be assessed and managed, in particular issues such as religious or other cultural proscriptions, local traditions and community structure and the relationship between men and women.

## G. Land acquisition and resettlement

Impacts and mitigation plans relating to land used for workers' accommodation facilities should be managed in the same way as for the project as a whole. As far as possible, land acquisition should be avoided or minimised.

## H. Dismantling and reinstatement

Dismantling and reinstatement of workers' accommodation should be taken into account at the outset of the project in order to avoid any unnecessary lasting impacts of the accommodations on the communities (land use for instance). Where possible and appropriate, the facilities can be handed over to the communities.

## Benchmarks

1. A community impact assessment has been carried out as part of the Environmental and Social Assessment of the overall project with a view to mitigate the negative impacts of the workers' accommodation on the surrounding communities and to enhance the positive ones.

2. The assessment includes potential health and safety impacts on the communities - including disturbances and safety issues caused by traffic (dust, noise, vibration, road accidents, disease) and consequences of land acquisition and involuntary resettlement occurring during the construction phase of the workers' accommodation.

3. Positive and negative impacts of workers' accommodation on community infrastructures,

services and facilities have been included in the assessment, including specific attention to emergency responses and evacuation plans.

4. Impacts of workers' accommodation on community local businesses and local employment have been included in the assessment.

5. General impacts of workers' accommodation on the health of communities (notably the increased risk of road accidents and the increase of communicable diseases) and community social cohesion have been included in the assessment.

6. The assessment includes appropriate mitigation measures to address any adverse impacts identified.

Table 1: A typology of workers' accommodation

Category	Subcategory/examples	Common characteristics	Sectors covered	Key issues
Rural workers' accommodation	Logging camp	Permanent or seasonal	Forestry	Worker access
	Off-farm accommodation	Remote	Agriculture	Monitoring difficulties
Plantation housing	Worker village	Permanent and long term	Agriculture	Need to provide sustainable livelihoods Social infrastructures Living conditions
	Off-farm accommodation	Families		
Construction camp	Worker camp	Temporary	Extractives	Enforcement of standards and monitoring difficulties Relations with the communities Living standards Cost
	Worker village	Migrant workers	Utilities	
	Mobile worker camp	Gender separation	Infrastructure Manufacturing	
Mine camp	Company towns	Long term	Extractives	Relations with communities Remoteness Living standards Worker access Long shifts No rest periods
	Dormitories	Remote location		
	Integrated within existing communities	Gender separation		
	Commuter (fly-in, fly-out)			
Factory dormitory		Permanent Urban Internal migrants	Garments/textiles Manufacturing – toys, electronics	Space Privacy Living standards Deduction of excessive rent from wages



### III. Types of workers' accommodation

There is a large variety of workers' living facilities. These may be classified in a number of ways. Table 1 provides one typology. Key criteria may include whether the facilities are temporary or permanent, their location (remote or non-remote), size, or economic sector (agriculture, mining, oil and gas, construction, manufacturing).

The typology above is given as an example only; other classifications are possible. For instance, housing may be categorised in terms

of project phases for example, exploration (fly-in, fly-out camps), construction (temporary construction camp often with large proportion of migrant workers) and operational (permanent, dormitory, possible family accommodation).

Depending on the type of project, specific attention should be given to either providing single workers' accommodation or family accommodation. As a general rule, the more permanent the housing, the greater considerations should be given to enabling workers to live with their families. Such consideration is important where the workforce is

#### Box 4 - Best practice on homeownership

When access to property schemes is proposed it is important to guarantee the sustainability of workers' investments. To this end, the location of the project and of the workers' accommodation and their integration in existing communities are factors to take into consideration. Caution should be exercised when offering such schemes in remote locations as it might be impossible to create a sustainable community and to develop non-project-related sources of livelihood.

**Affordable housing in a sustainable town:** A provider of affordable housing in South Africa and a provider of housing development for the mining sector worked together on a project to move away from mining hostels and rental villages to providing homeownership opportunities to workers. To this end they developed a 400-plus unit in a village 20 km from the mine with the idea to create an economically and socially viable community close to the mine. A concern was to integrate people within existing communities with the necessary social amenities and infrastructures and to put the emphasis on better housing conditions, home ownership and affordable housing for mining workers. The success of the project relied on the ability for the service provider to take into account the often difficult financial situation of workers. To overcome over-indebtedness of workers, specific access to property schemes and programmes have been designed

including employer support, economies of scale, low interest rate and stepped payment options.

#### **Affordable housing in a self-sustaining community:**

An FMO (Netherlands Development Finance Company) client operating a mine in a remote location intends to manage and develop a well-planned, secure, and independent village for approximately 1,000 employees. The FMO client is expected to provide residents with basic services, including water, electricity, and sewerage as well as education, health services, sports facilities, shops, green areas, and places of worship. In addition, provision has been made for a light industrial and small business area to support local business development. The long-term vision is for the Village to grow into a self-sustaining community of over 4,000 houses, which is capable of supporting a variety of small businesses and local enterprises. To support the long-term vision of a self-sustaining village and to provide mine employees with an opportunity to build up cash equity (in the form of a house), the FMO client will promote home ownership. In this context, an employee housing scheme has been designed that allows mine employees in all income categories to acquire title to property through mortgage debt all associated rights and obligations. Participation in the scheme is not a prerequisite for employment. The scheme includes several provisions to ensure affordability of home ownership to all mine employees and to protect employees against downside risks.

not sourced locally and in particular where migrant workers are used.<sup>5</sup> Provision for families will affect the other facilities necessary and the management of the accommodation. Best practice includes:

- „ To provide workers and their families individual family accommodation comprising bedrooms, sanitary and cooking facilities with an adequate level of privacy allowing families to have a normal family life.
- „ To provide nurseries, schools, clinics, and recreational facilities for children, or to make sure that those services are readily available in the surrounding communities and of good quality.

### Benchmarks

1. Consideration has been given to provision of family accommodation.

2. When arrangements for family accommodations are in place:

- families are provided with individual accommodation comprising bedroom, sanitary and cooking facilities
- adequate nursery/school facilities are provided
- special attention is paid to providing adequate safety for children.

#### Additional issue

In projects located in rural and remote locations, issues around the question of how workers can travel to their communities/countries of origin might arise. Alternatively, the possibility to create a sustainable community and to bring in the workers' families might be considered.

**Box 5 - Best practice on migrant workers' accommodation: Business in the Community - Voluntary Code of Practice on Employing Migrant Workers/Overseas Staff in Great Britain<sup>6</sup>**

The Code, which is designed to guide and reinforce best practice in relation to the employment of migrant workers, points out that migrant workers will often have to travel long distances and be in need of accommodation when they take up a job. Consequently, the Code suggests the following.

- „ Employers should assist with travel costs incurred by migrant workers during the recruitment stage and the repayment of these costs should follow a clear process and the money paid back at an agreed affordable rate over a specified time period. The total amount repayable should be no more than that lent so that workers are not financially disadvantaged.
- „ Employers, where possible, should support migrant workers in finding suitable accommodation. Workers should not be required to stay in accommodation provided by the employer but should be free to choose their own if they wish to do so. Where employers do provide accommodation, they should ensure that they do not breach the rules relating to the apportionment of wages for payment for accommodation (the accommodation offset rules).
- „ Employers should help to ensure that, where workers obtain their own accommodation, they are not being exploited, and offer advice and help if requested.
- „ Employers should ensure that accommodation which is provided is not overcrowded and does not pose a risk to the health and safety of those living there, and that any agreed notice periods are observed.

5. On the increase in the recognition of workers' rights to family life, the ILO Migrant Workers Convention No 143 calls Member States to take all necessary measures which fall within its competence and collaborate with other Members to facilitate the reunion of the families of all migrant workers legally residing in its territory. In the same way, Art 44-2 of the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families requires States Parties to take measures that they deem appropriate and that fall within their competence to facilitate the reunion of migrant workers with their spouses [...] as well as with their minor dependent unmarried children.

6. [www.bitc.org.uk/resources/publications/migrant\\_workers\\_1.html](http://www.bitc.org.uk/resources/publications/migrant_workers_1.html)

## PART II: STANDARDS FOR AND MANAGEMENT OF WORKERS' ACCOMMODATION

### I. Standards for workers' accommodation

This section looks at the principles and standards applicable to the location and construction of workers' accommodation, including the transport systems provided, the general living facilities, rooms/dormitories facilities, sanitary facilities, canteen and cooking facilities, food safety, medical facilities, and leisure/social facilities.

#### A. National/local standards

The key standards that need to be taken into consideration, as a baseline, are those contained in national/local regulations. Although it is quite unusual to find regulations specifically covering workers' accommodation, there may well be general construction standards which will be relevant. These may include the following standards:

- „ **Building construction:** for example, quality of material, construction methods, resistance to earthquakes.
- „ **Housing and public housing:** in some countries regulations for housing and public housing contain requirements on issues such as the basic amenities, and standards of repair.
- „ **General health, safety, and security:** requirements on health and safety are often an important part of building standards and might include provisions on occupation density, minimal air volumes, ventilation, the quality of the flooring (slip-resistant) or security against intrusion.
- „ **Fire safety:** requirements on fire safety are common and are likely to apply to housing facilities of any type. This can include provision on fire extinguishers, fire alarms, number and size of staircases and emergency exits, restrictions on the use of certain building materials.
- „ **Electricity, plumbing, water, and sanitation:** national design and construction standards often include very detailed provisions on electricity or plumbing fixtures/fittings, water, and sanitation connection/ equipment.

#### Benchmark

1. The relevant national and local regulations have been identified and implemented.

### B. General living facilities

Ensuring good standards in living facilities is important in order to avoid safety hazards and to protect workers from diseases and/or illness resulting from humidity, bad/stagnant water (or lack of water), cold, spread of fungus, proliferation of insects or rodents, as well as to maintain a good level of morale. The location of the facilities is important to prevent exposure to wind, fire, flood, and other natural hazards. It is also important that workers' accommodation is unaffected by the environmental or operational impacts of the worksite (for example noise, emissions, or dust) but is sufficiently close that workers do not have to spend undue amounts of time travelling from their accommodation to the worksite. Living facilities should be built using adequate materials and should always be kept in good repair, clean and free from rubbish and other refuse.

#### Benchmarks

1. Living facilities are located to avoid flooding and other natural hazards.
2. Where possible, living facilities are located within a reasonable distance from the worksite.
3. Transport from the living facilities to worksite is safe and free.
4. The living facilities are built with adequate materials, kept in good repair, and kept clean and free from rubbish and other refuse.

#### Drainage

The presence of stagnant water is a factor of proliferation of potential disease vectors such as mosquitoes, flies, and others, and must be avoided.

#### Benchmarks

1. The building site is adequately drained to avoid the accumulation of stagnant water.

Heating, air conditioning, ventilation, and light  
 Heating, air-conditioning and ventilation should be appropriate for the climatic conditions and provide workers with a comfortable and healthy environment to rest and spend their spare time.

**Benchmarks**

1. For facilities located in cold weather zones, the temperature is kept at a level of around 20 degrees Celsius notwithstanding the need for adequate ventilation.
2. For facilities located in hot weather zones, adequate ventilation and/or air conditioning systems are provided.
3. Both natural and artificial lighting are provided and maintained in living facilities. It is best practice that the window area represents not less than 5% to 10% of the floor area. Emergency lighting is provided.

**Water**

Special attention to water quality and quantity is absolutely essential. To prevent dehydration, water poisoning and diseases resulting from lack of hygiene, workers should always have easy access to a source of clean water. An adequate supply of potable water must be available in the same buildings where bedrooms or dormitories are provided. Drinking water must meet local or WHO drinking water standards<sup>7</sup> and water quality must be monitored regularly. Depending on the local context, it could either be produced by dedicated catchment and treatment facilities or tapped from existing municipal facilities if their capacity and quality are adequate.

**Benchmarks**

1. Access to an adequate and convenient supply of free potable water is always available to workers. Depending on climate, weather conditions and accommodation standards, 80 to 180 litres per person per day are available.
2. Drinking water meets national/local or WHO drinking water standards.<sup>8</sup>
3. All tanks used for the storage of drinking water are constructed and covered as to prevent water stored therein from becoming polluted or contaminated.

4. Drinking water quality is regularly monitored.

**Wastewater and solid waste**

Wastewater treatment and effluent discharge as well as solid waste treatment and disposal must comply with local or World Bank effluent discharge standards<sup>9</sup> and be adequately designed to prevent contamination of any water body, to ensure hygiene and to avoid the spread of infections and diseases, the proliferation of mosquitoes, flies, rodents, and other pest vectors. Depending on the local context, treatment and disposal services can be either provided by dedicated or existing municipal facilities.

**Benchmarks**

1. Wastewater, sewage, food, and any other waste materials are adequately discharged, in compliance with local or World Bank standards – whichever is more stringent – and without causing any significant impacts on camp residents, the biophysical environment or surrounding communities.
2. Rubbish containers are provided to locate rubbish containers 30 metres from each shelter on a wooden, metal, or concrete stand. Such containers must be emptied at regular intervals (to be determined based on temperatures and volumes generated) to avoid unpleasant odours associated with decaying organic materials.
3. Pest extermination, vector control and disinfection are carried out throughout the living facilities in compliance with local requirements and/or good practice. Where warranted, pest and vector monitoring should be performed on a regular basis.

7. www.who.int/water\_sanitation\_health/dwq/en/  
 8. ibid

9. As per the "Pollution Prevention and Abatement Handbook", World Bank Group, July 1998, available from www.worldbank.org

## C. Room/dormitory facilities

The standards of the rooms or dormitory facilities are important to allow workers to rest properly and to maintain good standards of hygiene. Overcrowding should be avoided particularly. This also has an impact on workers' productivity and reduces work-related accidents. It is generally acknowledged that rooms/dormitories should be kept clean and in a good condition. Exposure to noise and odour should be minimised. In addition, room/dormitory design and equipment should strive to offer workers a maximum of privacy. Resorting to dormitories should be minimised and single or double rooms are preferred. Dormitories and rooms must be single sex.

### Benchmarks

1. Rooms/dormitories are kept in good condition.
2. Rooms/dormitories are aired and cleaned at regular intervals.
3. Rooms/dormitories are built with easily cleanable flooring material.
4. Sanitary facilities are located within the same buildings and provided separately for men and women.
5. Density standards are expressed either in terms of minimal volume per resident or of minimal floor space. Usual standards range from 10 to 12.5 cubic metres (volume) or 4 to 5.5 square metres (surface).
6. A minimum ceiling height of 2.10 metres is provided.
7. In collective rooms, which are minimised, in order to provide workers with some privacy, only a reasonable number of workers are allowed to share the same room. Standards range from 2 to 8 workers.
8. All doors and windows should be lockable, and provided with mosquito screens where conditions warrant.
9. There should be mobile partitions or curtains to ensure privacy.
10. Every resident is provided with adequate furniture such as a table, a chair, a mirror, and a bedside light.
11. Separate sleeping areas are provided for men and women, except in family accommodation.

### Additional issue

Irrespective of whether workers are supposed to keep their facilities clean, it is the responsibility of the accommodation manager to ensure that rooms/dormitories and sanitary facilities are in good condition.

### Bed arrangements and storage facilities

The provision of an adequate numbers of beds of an appropriate size is essential to provide workers with decent, safe, and hygienic conditions to rest and sleep. Here again, particular attention should be paid to privacy. Consideration should be given to local customs so beds could be replaced by hammocks or sleeping mats for instance.

### Benchmarks

1. A separate bed for each worker is provided. The practice of "hot bedding" should be avoided.
2. There is a minimum space between beds of 1 metre.
3. Double deck bunks are not advisable for fire safety and hygiene reasons, and their use is minimised. Where they are used, there must be enough clear space between the lower and upper bunk of the bed. Standards range from 0.7 to 1.10 metres.
4. Triple deck bunks are prohibited.
5. Each worker is provided with a comfortable mattress, pillow, cover, and clean bedding.
6. Bed linen is washed frequently and applied with repellents and disinfectants where conditions warrant (malaria).
7. Facilities for the storage of personal belongings for workers are provided. Standards vary from providing an individual cupboard for each worker to providing 475-litre big lockers and 1 metre of shelf unit.
8. Separate storage for work boots and other personal protection equipment, as well as drying/airing areas may need to be provided depending on conditions.

## D. Sanitary and toilet facilities

It is essential to allow workers to maintain a good standard of personal hygiene but also to prevent contamination and the spread of diseases which result from inadequate sanitary facilities. Sanitary and toilet facilities will always include all of the following: toilets, urinals, washbasins, and showers. Sanitary and toilet facilities should be kept in a clean and fully working condition. Facilities should also be constructed of materials that are easily cleanable and ensure privacy. Sanitary and toilet facilities are never shared between male and female residents, except in family accommodation. Where necessary, specific additional sanitary facilities are provided for women.

### Benchmarks

1. Sanitary and toilet facilities are constructed of materials that are easily cleanable.
2. Sanitary and toilet facilities are cleaned frequently and kept in working condition.
3. Sanitary and toilet facilities are designed to provide workers with adequate privacy, including ceiling to floor partitions and lockable doors.
4. Sanitary and toilet facilities are not shared between men and women, except in family accommodation.

### Toilet facilities

Toilet arrangements are essential to avoid any contamination and prevent the spread of infectious disease.

### Benchmarks

1. An adequate number of toilets is provided to workers. Standards range from 1 unit to 15 persons to 1 unit per 6 persons. For urinals, usual standards are 1 unit to 15 persons.
2. Toilet facilities are conveniently located and easily accessible. Standards range from 30 to 60 metres from rooms/dormitories. Toilet rooms shall be located so as to be accessible without any individual passing through any sleeping room. In addition, all toilet rooms should be well-lit, have good ventilation or external windows, have sufficient hand wash basins and be conveniently located. Toilets and other sanitary facilities should be ("must be" in cold climates) in the same building as rooms and dormitories.

Showers/bathrooms and other sanitary facilities Hand wash basins and showers should be provided in conjunction with rooms/dormitories. These facilities must be kept in good working condition and cleaned frequently. The flooring for shower facilities should be of hard washable materials, damp-proof and properly drained. Adequate space must be provided for hanging, drying, and airing clothes. Suitable light, ventilation and soap should be provided. Lastly, hand washing, shower and other sanitary facilities should be located within a reasonable distance from other facilities and from sleeping facilities in particular.

### Benchmarks

1. Shower/bathroom flooring is made of anti-slip hard washable materials.
2. An adequate number of handwash facilities is provided to workers. Standards range from 1 unit to each 15 persons to 1 unit per 6 workers. Handwash facilities should consist of a tap and a basin, soap, and hygienic means of drying hands.
3. An adequate number of shower/bathroom facilities is provided to workers. Standards range from 1 unit to 15 persons to 1 unit per 6 persons.
4. Showers/bathrooms are conveniently located.
5. Shower/bathroom facilities are provided with an adequate supply of cold and hot running water.

## E. Canteen, cooking and laundry facilities

Good standards of hygiene in canteen/dining halls and cooking facilities are crucial. Adequate canteen, cooking and laundry facilities and equipment should also be provided. When caterers are contracted to manage kitchens and canteens, special attention should be paid to ensure that contractors take into account and implement the benchmarks below, and that adequate reporting and monitoring mechanisms are in place. When workers can individually cook their meals, they should be provided with a space separate from the sleeping areas. Facilities must be kept in a clean and sanitary condition. In addition, canteen, kitchen, cooking and laundry floors, ceilings and walls should be made of easily cleanable materials.

### Benchmarks

1. Canteen, cooking, and laundry facilities are built in adequate and easy to clean materials.
2. Canteen, cooking, and laundry facilities are kept in a clean and sanitary condition.
3. If workers can cook their own meals, kitchen space is provided separate from sleeping areas.

#### Laundry facilities

Providing facilities for workers to wash both work and non-work related clothes is essential for personal hygiene. The alternative is for the employer to provide a free laundry service.

### Benchmarks

1. Adequate facilities for washing and drying clothes are provided. Standards range from providing sinks or tubs with hot and cold water, cleaning soap and drying lines to providing washing machines and dryers.
2. When work clothes are used in contact with dangerous substance (for example, application of pesticide), special laundry facilities (washing machines) should be provided.

#### Additional issue

When workers are provided with facilities allowing them to individually do their laundry or cooking, it should be the responsibility of each worker to keep the facilities in a clean and sanitary condition. Nonetheless, it is the responsibility of the accommodation manager to make sure the standards are respected and to provide an adequate cleaning, disinfection, and pest/vector control service when necessary.

#### Additional issue

When the employer provides family accommodation, it is best practice to provide each family with a private kitchen or the necessary cooking equipment to allow the family to cook on their own.

#### Canteen and cooking facilities

Canteen and cooking facilities should provide sufficient space for preparing food and eating, as well as conform to hygiene and safety requirements.

### Benchmarks

1. Canteens have a reasonable amount of space per worker. Standards range from 1 square metre to 1.5 square metres.
2. Canteens are adequately furnished. Standards range from providing tables, benches, individual drinking cups and plates to providing special drinking fountains.
3. Places for food preparation are designed to permit good food hygiene practices, including protection against contamination between and during food preparation.
4. Kitchens are provided with facilities to maintain adequate personal hygiene including a sufficient number of washbasins designated for cleaning hands with clean, running water and materials for hygienic drying.
5. Wall surfaces adjacent to cooking areas are made of fire-resistant materials. Food preparation tables are also equipped with a smooth durable washable surface. Lastly, in order to enable easy cleaning, it is good practice that stoves are not sealed against a wall, benches and fixtures are not built into the floor, and all cupboards and other fixtures and all walls and ceilings have a smooth durable washable surface.
6. All kitchen floors, ceiling and wall surfaces adjacent to or above food preparation and cooking areas are built using durable, non-absorbent, easily cleanable, non-toxic materials.
7. Wall surfaces adjacent to cooking areas are made of fire-resistant materials. Food preparation tables are equipped with a smooth, durable, easily cleanable, non-corrosive surface made of non-toxic materials. Lastly, in order to enable easy cleaning, it is good practice that stoves are not sealed against a wall, benches and fixtures are not built into the floor, and all cupboards and other fixtures have a smooth, durable, and washable surface.
8. Adequate facilities for cleaning, disinfecting and storage of cooking utensils and equipment are provided.
9. Food waste and other refuse are to be adequately deposited in sealable containers and removed from the kitchen frequently to avoid accumulation.

## F. Standards for nutrition and food safety

When cooking for a number of workers, hygiene and food safety are absolutely critical. In addition to providing safe food, providing nutritious food is important as it has a very direct impact on workers' productivity and well-being. An ILO study demonstrates that good nutrition at work leads to gains in productivity and worker morale, prevention of accidents and premature deaths and reductions in health care costs.<sup>10</sup>

### Benchmarks

1. The WHO 5 keys to safer food or an equivalent process is implemented (see Box 6 below).
2. Food provided to workers contains an appropriate level of nutritional value and takes into account religious/cultural backgrounds; different choices of food are served if workers have different cultural/ religious backgrounds.
3. Food is prepared by cooks. It is also best practice that meals are planned by a trained nutritionist.

#### Box 6 - Five keys to safer food

##### Keep clean

Wash your hands before handling food and often during food preparation.  
 Wash your hands after going to the toilet.  
 Wash and sanitise all surfaces and equipment used for food preparation.  
 Protect kitchen areas and food from insects, pests, and other animals.

While most micro-organisms do not cause disease, dangerous micro-organisms are widely found in soil, water, animals, and people. These micro-organisms are carried on hands, wiping cloths and utensils, especially cutting boards and the slightest contact can transfer them to food and cause food borne diseases.

##### Separate raw and cooked

Separate raw meat, poultry, and seafood from other foods.  
 Use separate equipment and utensils such as knives and cutting boards for handling raw foods.  
 Store food in containers to avoid contact between raw and prepared foods.

Raw food, especially meat, poultry and seafood, and their juices, can contain dangerous micro-organisms which may be transferred onto other foods during food preparation and storage.

##### Cook thoroughly

Cook food thoroughly, especially meat, poultry, eggs, and seafood.  
 Bring foods like soups and stews to boiling to make sure that they have reached 70°C. For meat and poultry, make sure that juices are clear, not pink. Ideally, use a thermometer.  
 Reheat cooked food thoroughly.

Proper cooking kills almost all dangerous micro-organisms. Studies have shown that cooking food to a temperature of 70°C can help ensure it is safe for consumption. Foods that require special attention include minced meats, rolled roasts, large joints of meat and whole poultry.

##### Keep food at safe temperatures

Do not leave cooked food at room temperature for more than 2 hours.  
 Refrigerate promptly all cooked and perishable food (preferably below 5°C).  
 Keep cooked food piping hot (more than 60°C) prior to serving.  
 Do not store food too long even in the refrigerator.  
 Do not thaw frozen food at room temperature.

Micro-organisms can multiply very quickly if food is stored at room temperature. By holding at temperatures below 5°C or above 60°C, the growth of micro-organisms is slowed down or stopped. Some dangerous micro-organisms still grow below 5°C.

##### Use safe water and raw materials

Use safe water or treat it to make it safe.  
 Select fresh and wholesome foods.  
 Choose foods processed for safety, such as pasteurised milk.  
 Wash fruits and vegetables, especially if eaten raw.  
 Do not use food beyond its expiry date.

Raw materials, including water and ice, may be contaminated with dangerous micro-organisms and chemicals. Toxic chemicals may be formed in damaged and mouldy foods. Take care in selection of raw materials and implement simple measures such as washing.



Source: *World Health Organization, Food Safety*  
[www.who.int/foodsafety/publications/consumer/en/5keys\\_en.pdf](http://www.who.int/foodsafety/publications/consumer/en/5keys_en.pdf)

10. C. Wanjek (2005), "Food at Work – Workplace solutions for malnutrition, obesity and chronic disease", International Labour Organization, Geneva.

## G. Medical facilities

Access to adequate medical facilities is important to maintain workers' health and to provide adequate responses in case of health emergency situations. The availability or level of medical facilities provided in workers' accommodation is likely to depend on the number of workers living on site, the medical facilities already existing in the neighbouring communities and the availability of transport. However, first aid must always be available on site.

### First aid facilities

Providing adequate first aid training and facilities can save lives and prevent minor injuries becoming major ones.

### Other medical facilities

Depending on the number of workers living on site and the medical services offered in the surrounding communities, it is important to provide workers with additional medical facilities. Special facilities for sick workers and medical services such as dental care, surgery, a dedicated emergency room can, for instance, be provided.

## Benchmarks

1. A number of first aid kits adequate to the number of residents are available.
2. First aid kits are adequately stocked. Where possible a 24/7 first aid service/facility is available.
3. An adequate number of staff/workers is trained to provide first aid.
4. Where possible and depending on the medical infrastructures existing in the community, other medical facilities are provided (nurse rooms, dental care, minor surgery).

### Box 7 - UK/HSE First Aid facilities

#### What should be in a first aid kit?

There is no standard list and it very much depends on the assessment of the needs in a particular workplace:

- „ a leaflet giving general guidance on first aid, for example HSE leaflet *Basic advice on first aid at work*
- „ individually wrapped sterile adhesive dressings (assorted sizes)
- „ two sterile eye pads
- „ four individually wrapped triangular bandages (preferably sterile)
- „ six safety pins
- „ six medium-sized (approximately 12 cm x 12 cm) individually wrapped sterile unmedicated wound dressings
- „ two large (approximately 18 cm x 18 cm) sterile individually wrapped unmedicated wound dressings
- „ one pair of disposable gloves.

#### What should be kept in the first aid room?

The room should contain essential first aid facilities and equipment. Typical examples of these are:

- „ a sink with hot and cold running water „ drinking water and disposable cups „ soap and paper towels
- „ a store for first aid materials
- „ foot-operated refuse containers, lined with disposable yellow clinical waste bags or a container for the safe disposal of clinical waste
- „ a couch with waterproof protection, clean pillows, and blankets
- „ a chair
- „ a telephone or other communication equipment „ a record book for recording incidents where first aid has been given.

Source: UK Health and Safety Executive

## H. Leisure, social and telecommunication facilities

Basic leisure and social facilities are important for workers to rest and also to socialise during their free time. This is particularly true where workers' accommodation is located in remote areas far from any communities. Where workers' accommodation is located in the vicinity of a village or a town, existing leisure or social facilities can be used so long as this does not cause disruption to the access and enjoyment of local community members. But in any case, social spaces should also be provided on site. Exercise and recreational facilities will increase workers' welfare and reduce the impact of the presence of workers in the surrounding communities. In addition, it is also important to provide workers with adequate means to communicate with the outside world, especially when workers' accommodation

is located in a remote location or where workers live on site without their family or are migrants. Consideration of cultural attitudes is important. Provision of space for religious observance needs to be considered, taking account of the local context and potential conflicts in certain situations.

### Benchmarks

1. Basic collective social/rest spaces are provided to workers. Standards range from providing workers multi-purpose halls to providing designated areas for radio, TV, cinema.
2. Recreational facilities are provided. Standards range from providing exercise equipment to providing a library, swimming pool, tennis courts, table tennis, educational facilities.
3. Workers are provided with dedicated places for religious observance if the context warrants.
4. Workers have access to public phones at affordable/ public prices (that is, not inflated).
5. Internet facilities can also be provided, particularly where large numbers of expatriates/Third Country Nationals (TCNs) are accommodated.

### Box 8 - Examples of social/leisure facilities

In Qatar there is a newly built 170-hectare complex which accommodates contractors and more than 35,000 workers for a project run by a major oil company. At the heart of this complex, the recreation area includes extensive sport facilities, a safety-training centre, an outdoor cinema, and a park. The purpose of those facilities goes beyond providing adequate accommodation to the large numbers of contractors and workers on this project but is designed to provide the same level of services as a small town. The accommodation complex has a mayor, as well as a dedicated welfare team which is responsible for the workers' welfare, cultural festivals and also acts as the community's advocates.

## II. Managing workers' accommodation

Once the living facilities have been constructed and are operational, effective ongoing management of living facilities is essential. This encompasses issues such as the physical maintenance of buildings, security and consultation with residents and neighbouring communities in order to ensure the implementation of the housing standards in the long term.

### A. Management and staff

Worker camps and housing facilities should have a written management plan, including management policies or plans on health and safety, security, living conditions, workers' rights and representation, relationships with the communities and grievance processes. Part of those policies and plans can take the form of codes of conduct. The quality of the staff managing and maintaining the accommodation facilities will have a decisive impact on the level of standards which are implemented and the well-being of workers (for instance on the food safety or overall hygiene standards). It is therefore important to ensure that managers are competent and other workers are adequately skilled. The manager will be responsible for overseeing staff, for ensuring the implementation of the accommodation standards and for the implementation of the management plans. It is important the accommodation manager has the corresponding authority to do so.

If the facility is being managed by a contractor, as is often the case, the expected housing and management standards should be specified in the relevant contract, and mechanisms to ensure that those standards are implemented should be set up. As part of this process, the accommodation manager (or contractor) should have a duty to monitor the application of the accommodation standards and to report frequently on their implementation to the client.

### Benchmarks

1. There are management plans and policies especially in the field of health and safety (with emergency responses), security, workers' rights, relationships with the communities.
2. An appointed person with the adequate background and experience is in charge of managing the workers' accommodation.
3. If contractors are being used, there are clear contractual management responsibilities and monitoring and reporting requirements.
4. Depending on the size of the accommodation, there is a sufficient number of staff in charge of cleaning, cooking and of general maintenance.
5. Such staff are recruited from the local communities.
6. Staff have received basic health and safety training.
7. Persons in charge of the kitchen are trained in nutrition and food-handling and adequately supervised.

## B. Charging fees for accommodation and services

Charging fees for the accommodation or the services provided to workers such as food or transport should be avoided where workers do not have the choice to live or eat anywhere else, or if deemed unavoidable, should take into account the specific nature of workers' accommodation. Any charges should be transparent, discussed during recruitment and specified in workers' contracts. Any such charges should still leave workers with sufficient income and should never lead to a worker becoming indebted to an employer.

### Benchmarks

1. When fees are charged, workers are provided with clear information and a detailed description of all payments made such as rent, deposit and other fees.
2. When company housing is considered to be part of workers' wages, it is best practice that workers are provided with an employment contract clearly specifying housing arrangements and regulations, in particular rules concerning payments and fees, facilities and services offered and rules of notice.
3. When fees are charged, the renting arrangements are fair and do not cost the worker more than a small proportion of income and never include a speculative profit.
4. Food and other services are free or are reasonably priced, never above the local market price.
5. The provision of accommodation or other services by employers as a payment for work is prohibited.

#### Additional issue

To avoid that fair renting arrangements turn into unfair ones, any deposit of advance should be set at a reasonable level and it is best practice that renting prices include a fixed fee covering the water needed and the use of the energy required to the functioning of the heating/cooling/ventilation/ cooking systems. However, in such cases it might be necessary to raise workers' awareness to ensure that workers will use the facilities responsibly, particularly in areas where water is scarce.

## C. Health and safety on site

The company or body in charge of managing the workers' accommodation should have the prime responsibility for ensuring workers' physical well-being and integrity. This involves making sure that the facilities are kept in good condition (ensuring that sanitary standards or fire regulations are respected for instance) and that adequate health and safety plans and standards are designed and implemented.

### Benchmarks

1. Health and safety management plans including electrical, mechanical, structural and food safety have been carefully designed and are implemented.
2. The person in charge of managing the accommodation has a specific duty to report to the health authorities the outbreak of any contagious diseases, food poisoning and other important casualties.
3. An adequate number of staff/workers is trained to provide first aid.
4. A specific fire safety plan is prepared, including training of fire wardens, periodic testing and monitoring of fire safety equipment and periodic drills.
5. Guidance on the detrimental effects of the abuse of alcohol and drugs and other potentially harmful substances and the risk and concerns relating to HIV/AIDS and of other health risk-related activities is provided to workers. It is best practice to develop a clear policy on this issue.
6. Workers have access to adequate preventive measures such as contraception (condoms in particular) and mosquito nets.
7. Workers have easy access to medical facilities and medical staff. Where possible, female doctors/nurses should be available for female workers.
8. Emergency plans on health and fire safety are prepared. Depending on the local context, additional emergency plans are prepared as needed to handle specific occurrences (earthquakes, floods, tornadoes).

## D. Security of workers' accommodation

Ensuring the security of workers and their property on the accommodation site is of key importance. To this end, a security plan must be carefully designed including appropriate measures to protect workers against theft and attacks. Policies regarding the use of force (force can only be used for preventive and defensive purposes in proportion to the nature and the extent of the threat) should also be

carefully designed. To implement those plans, it may be necessary to contract security services or to recruit one or several staff whose main responsibility is to provide security to safeguard workers and property. Before making any security arrangements, it is necessary to assess the risks of such arrangements to those within and outside the workers' accommodation and to respect best international practices, including IFC PS4 and EBRD PR4 and applicable law.<sup>11</sup> Particular attention should be paid to the safety and security of women workers.

### Benchmarks

1. A security plan including clear measures to protect workers against theft and attack is implemented.
2. A security plan including clear policies on the use of force has been carefully designed and is implemented.
3. Security staff have been checked to ensure that they have not been implicated in any previous crimes or abuses. Where appropriate, security staff from both genders are recruited.
4. Security staff have a clear mandate and have received clear instruction about their duties and responsibilities, in particular their duties not to harass, intimidate, discipline, or discriminate against workers.
5. Security staff have received adequate training in dealing with domestic violence and the use of force.
6. Security staff have a good understanding about the importance of respecting workers' rights and the rights of the communities.
7. Body searches are only allowed in specific circumstances and are performed by specially trained security staff using the least-intrusive means possible. Pat down searches on female workers can only be performed by female security staff.
8. Security staff adopt an appropriate conduct towards workers and communities.
9. Workers and members of the surrounding communities have specific means to raise concerns about security arrangement and staff.

11. See for instance the Voluntary Principles on Security and Human Rights. [www.voluntaryprinciples.org/principles](http://www.voluntaryprinciples.org/principles)

## E. Workers' rights, rules, and regulations on workers' accommodation

Freedoms and human rights of workers should be recognised and respected within their living quarters just as within the working environment. House rules and regulations should be reasonable and non-discriminatory. It is best practice that workers' representatives are consulted about those rules. House rules and regulations should not prevent workers from exercising their basic rights. In particular, workers' freedom of movement needs to be preserved if they are not to become effectively "trapped". To this end it is good practice to provide workers with 24/7 access to the accommodation and free transport services to and from the surrounding communities. Any restriction to this freedom of movement should be limited and duly justified. Penalties for breaking the rules should be proportional and implemented through a proper procedure allowing workers to defend themselves and to challenge the decision taken. The relationship between continuing employment and compliance with the rules of the workers' accommodation should be clear and particular attention should be paid to ensure that housing rules do not create indirect limitation of the right to freedom of association. Best practice might include a code of conduct relating to the accommodation to be signed together with the contract of employment.

### Box 9 - Dole housing plantation regulation in Costa Rica

In every plantation there is an internal accommodation regulation that every worker is required to sign together with his/her employment contract. That document describes the behaviour which is expected from workers at all times and basic rules such as the prohibition of alcohol and the interdiction to make noise after a certain time at night. In case there is any problem concerning the application of those internal rules, a set of disciplinary procedures which have been designed with the workers' representatives can be enforced. Workers are absolutely free to enter or leave the site and do not have any restrictions in relation to accessing their living quarters. Families are not allowed in the living quarters unless they have been registered for a visit.

## Benchmarks

1. Restriction of workers' freedom of movement to and from the site is limited and duly justified. It is good practice to provide workers 24/7 access to the accommodation site. Any restrictions based on security reasons should be balanced by the necessity to respect workers' freedom of movement.
2. Where possible, an adequate transport system to surrounding communities is provided. It is good practice to provide workers with free transportation to and from local communities.
3. Withholding workers' ID papers is prohibited.
4. Freedom of association is expressly respected. Provisions restricting workers' rights on site should take into account the direct and indirect effect on workers' freedom of association. It is best practice to provide trade union representatives access to workers in the accommodation site.
5. Workers' gender and religious, cultural, and social backgrounds are respected. In particular, workers should be provided with the possibility of celebrating religious holidays and observances.
6. Workers are made aware of their rights and obligations and are provided with a copy of the internal workers' accommodation rules, procedures, and sanction mechanisms in a language or through a media which they understand.
7. Housing regulations, including those relating to allocation of housing, should be non-discriminatory. Any justifiable discriminatory rules – for example all-male dormitories – should be strictly limited to the rules which are necessary to ensure the smooth running of the worker camp and to maintain a good relationship with the surrounding communities.
8. Where possible, visitor access should be allowed.
9. Decisions should be made on whether to prohibit alcohol, tobacco and third-party access or not from the camp and the relevant rules should be clearly communicated to all residents and workers.
10. A fair and non-discriminatory procedure exists to implement disciplinary procedures including the right of workers to defend themselves (see also next section).

## F. Consultation and grievance mechanisms

All residents should be made aware of any rules governing the accommodation and the consequences of breaking such rules. Processes that allow for consultation between site management and the resident workers will assist in the smooth running of an accommodation site. These may include a dormitory or camp committee as well as formal processes that allow workers to lodge any grievances about their accommodation.

### Benchmarks

1. Mechanisms for workers' consultation have been designed and implemented. It is best practice to set up a review committee which includes representatives elected by workers.
2. Processes and mechanisms for workers to articulate their grievances are provided to workers. Such mechanisms are in accordance with PS2/PR2.
3. Workers subjected to disciplinary proceedings arising from behaviour in the accommodation should have access to a fair and transparent hearing with the possibility to contest decisions and refer the dispute to independent arbitration or relevant public authorities.
4. In case conflicts between workers themselves or between workers and staff break out, workers have the possibility of easily accessing a fair conflict resolution mechanism.
5. In cases where more serious offences occur, including serious physical or mental abuse, there are mechanisms to ensure full cooperation with the police authority (where adequate).

#### Additional issue

Alcohol is a complex issue and requires a very clear policy from the workers' accommodation management. If a non-alcohol policy is taken, special attention should be paid to clearly communicate the interdiction, how it applies and the consequences for breaching this rule. Special attention should also be paid to enforce it adequately.

## G. Management of community relations

Workers' living facilities have various ongoing impacts on adjacent communities. In order to manage these, it is good practice to design a thorough community relations management plan. This plan will contain the processes to implement the findings of the preliminary community impact assessment and to identify, manage, mitigate, or enhance ongoing impacts of the workers' accommodation on the surrounding communities. Issues to be taken into consideration include:

- » community development – impact of workers' camp on local employment, possibility of enhancing local employment and income generation through local sourcing of goods and services
- » community needs – ways to identify and address community needs related to the arrival of specific infrastructures such as telecommunications, water sanitation, roads, health care, education, housing
- » community health and safety – addressing and reducing the risk in the increase in communicable diseases, corruption, trade in illegal substances such as drugs, alcohol (in the Muslim context), petty crimes and other sorts of violence, road accidents
- » community social and cultural cohesion – ways to mitigate the impact of the presence of large numbers of foreign workers, often males, with different cultural and religious background, ways to mitigate the possible shift in social, economic, and political structures due to changes in access to income generation opportunities.

### Benchmarks

1. Community relations plans addressing issues around community development, community needs, community health and safety and community social and cultural cohesion have been designed and implemented.
2. Community relations plans include the setting up of a liaison mechanism allowing a constant exchange of information and consultation with the local communities in order to identify and respond quickly to any problems and maintain good working relationships.
3. A senior manager is in charge of implementing the community relations management plan and liaising with the community.

4. The impacts of workers' accommodation on local communities are periodically reviewed, mitigated, or enhanced.
5. Community representatives are provided with an easy means to voice their opinions and to lodge complaints.
6. There is a transparent and efficient process for dealing with community grievances, in accordance with PS1/PR10.

Box 10 - Examples of community relations management

**Community consultation in the Baku-Tbilisi-Ceyhan (BTC) pipeline**

The BTC pipeline's Environment and Social Management Plans incorporated a Worker Camp Management Plan to be implemented by the construction contractor. As part of ongoing community liaison over the project as a whole, community liaison officers were appointed for worker camps who were responsible for meeting regularly with communities, identifying issues and addressing community concerns. A particular responsibility was to review HR records and disciplinary logs at worker camps to assess that rules were being implemented effectively and that any community liaison after any incidents was effective.





## ANNEX I: Workers' Accommodations Checklist

Y | N | N/A | Comments

### General regulatory framework

Have the international/national/local regulatory frameworks been reviewed?				
Are mandatory provisions on workers' accommodation identified?				

### Assessing the need for workers' accommodation

#### Availability of the workforce

Has there been an assessment of workers' availability in the neighbouring communities?				
Has there been an assessment of the skills and competencies of the local workforce and how do those skills and competencies fit the project's need?				
Has there been an assessment of the possibility of training a local workforce in order to fulfil the project's needs.				

#### Availability of housing

Has there been a comprehensive assessment of the different type of housing available in the surrounding communities prior to building any workers' accommodation?				
For a larger project is that assessment included in the Environmental and Social Impact Assessment?				
Has there been an assessment of the impact on the communities of using existing housing opportunities?				
Have measures to mitigate adverse impacts on the local housing market been identified and included in the Environmental and Social Action Plan (ESAP) or other relevant action plan?				