



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Kiribati	EAST ASIA AND PACIFIC	P176478	
Project Name	South Tarawa Sanitation Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Water	Investment Project Financing	1/17/2022	3/23/2022
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance and Economic Development	Ministry of Infrastructure and Sustainable Energy		

Proposed Development Objective

The Project Development Objective is to increase access to sanitation services in selected areas of South Tarawa and to improve efficiency in sanitation service delivery.

Financing (in USD Million)	Amount
Total Project Cost	15.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

To achieve the project Development Objectives (PDOs), the proposed project will have four components: 1. Improving access to sanitation services in South Tarawa and protecting fresh water sources by increasing connections to the existing sewerage system and by constructing on-site sanitation systems; 2. Building sector capacity and improving the performance of PUB and MISE in their operation and maintenance of sanitation systems; 3. Providing Sanitation and Hygiene Awareness and Education; and 4. Supporting project management and sector institutional strengthening.

D. Environmental and Social Overview



D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The Republic of Kiribati is one of the smallest, most remote and geographically dispersed countries in the world. The country consists of 32 low lying coral islands and one raised coral island in three main island groups. The capital, South Tarawa, is about 4,000 kilometers from the major trade markets of Australia and New Zealand with a total population of approximately 50,000.

Most islands are no more than two meters above mean sea level and only a few hundred meters wide facing considerable risk from climate variability and sea-level rise. Severe infrastructure deficits compound the constraints imposed by distance and dispersion. Increasing sea temperatures and contamination are placing strain on the coastal marine habitats that many rely on for food security and livelihoods. Poor access to fresh water is compounded by climate change and contamination and poses severe challenges for public health and poverty reduction.

South Tarawa is located in the relatively dry equatorial climate zone and average annual rainfall in Tarawa is 2,100 mm. (highly variable and in the driest years as little as 150 mm of rain has fallen). Access to basic water supply in Kiribati is limited and Bonriki and Buota's rainfall-fed groundwater lenses are the only available freshwater sources in South Tarawa which are suitable for drinking water production.

A recent study conducted for South Tarawa shows 70.6 percent of the population have access to improved sanitation, 3.9 percent use unimproved facilities and 25.4 percent practice open defecation (noting that 60 percent of the population practice open defecation occasionally). South Tarawa has three sewerage systems coupled with seawater supply networks for flushing in the centers of Betio, Bairiki and Bikenibeu. Connection rate to the sewerage networks is low due to the lack of financial support or incentive to facilitate households' connections, and the systems currently service only 17.6 percent of the population. For households who use on-site sanitation facilities, the Public Utility Board (PUB) offers a vacuum truck service to households with access roads for emptying septic tanks. All sewage is discharged untreated through ocean outfalls, which have recently been upgraded to diffuse sewage 30 meters deep, beyond the reef edge, based on the findings of a pollution diffusion modeling study.

The Project Development Objective is to increase access to sanitation services in selected areas of South Tarawa and to improve the PUB's efficiency in sanitation service delivery.

Project Components include: Component 1 (Increase access to sanitation services) through increasing connections to the existing sewerage system, retrofit of the saltwater flushing system to dispose current standpipes and connect directly to toilets, toilet provision to poor households currently practicing open defecation, and construction of on-site sanitation systems, decentralized sanitation systems and communal toilets; Component 2 (Sector capacity building and performance improvement) which will aim to strengthen the capacity of PUB and the Ministry of Infrastructure and Sustainable Energy (MISE) to manage sanitation services to ensure the sustainability of the systems implemented under Component 1 and to establish a regular groundwater and coastal water quality monitoring system and to establish and to build and maintain a register of on-site sanitation installations; Component 3 (Sanitation and hygiene awareness and education) by supporting significant transformations in the population's sanitation behavior and continuing on from the Water, Sanitation and Hygiene (WaSH) Awareness Program that will be initiated under P162938, South Tarawa Water Supply Project (STWSP); and Component 4 (Project management and institutional strengthening). Physical activities will take place in Betio, Bikenibeu and Bariki which are all brownfield environments.



D. 2. Borrower’s Institutional Capacity

The Ministry of Finance and Economic Development (MFED) will be the Project Borrower, while the implementing agency will be MISE as they play a policy, planning and regulatory role within the water, sanitation and hygiene (WaSH) sector. The arrangement is similar to that of the current Kiribati -South Tarawa Water Supply Project. The National Infrastructure Development Steering Committee (NIDSC) will act as the project steering committee to provide strategic direction and guidance for the Project. PUB has responsibility for the centralized sewer system and will be a key stakeholder, particularly in the implementation of Subcomponent 1.1 and Component 2. MISE will procure the contracts for goods and works related to the centralized sewerage system on behalf of PUB (with PUB participation in the process) while the contracts will be managed by PUB. MISE will then also act to provide oversight and carry out technical and financial audits over these contracts. A project management unit (PMU) will be financed within MISE under Component 4 and environmental and social (E&S) risk management implementation and supervision arrangements for the project will be supported by the Kiribati Fiduciary Services Unit (KFSU).

The Government of Kiribati (GoK) and the KFSU have previous experience with World Bank financed projects under the World Bank Environmental and Social Framework (ESF). However, the World Bank will be required to provide support and capacity building as other ESF projects are either new or still in preparation and MISE has only previously implemented projects under the Safeguards Policies.

The KFSU is based within MFED and will provide Financial Management, Procurement, E&S, and Monitoring & Evaluation (M&E) oversight to the Project. The KFSU has engaged a social officer and is in the process of engaging an environmental officer and an environmental and social specialist. The KFSU, will lead the development of project’s E&S instruments and may be supplemented by an international E&S specialist, if required to fill KFSU resourcing gaps, who will either be recruited directly to the PMU..

MISE are currently implementing the World Bank financed STWSP (P162938) under the Safeguards Policies. The PMU have been responsive to E&S risk management requirements and safeguards performance is rated as satisfactory.

General capacity building within the Kiribati water sector has previously included i) technical support from the Pacific Regional Infrastructure Facility (PRIF) for the implementation of the Kiribati Utility Services Reform Project (KUSRP) aimed at providing recommendations for the improvement of PUB’s operational and financial sustainability was funded together with the Asia Development Bank (ADB) from 2015-2017; and ii) the STWSP (P162938), to strengthen PUB capacity by mobilizing an international private operator to be in charge of the water supply system’s operation and maintenance for over a five-year period after its reconstruction, while modernizing PUB’s management systems and procedures and training its staff on-the-job is co-financed by IDA, ADB and the Global Environmental Fund (GEF) and was approved in 2019. This PUB capacity building effort will be complemented through training and systems modernization activities under the Critical Utility Reform Project (CURP) funded by New Zealand Ministry of Foreign Affairs and Trade (NZ MFAT).

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

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Environmental Risk Rating

Substantial

The project is expected to result in a positive environmental outcome. The Tarawa environment (including the groundwater lens, coastal waters and lagoon) is deteriorating with high fecal coliform counts from septic tanks, pit toilets, leachate from solid waste, and organic and inorganic pollutants from congested and developed areas. The Project includes both physical investments and technical assistance (TA) activities that will result in improved coastal, lagoon and groundwater lens water quality through i) the provision of safe sanitation facilities to reduce open defecation; ii) increased connectivity to the sewage system iii) increased capacity of both MISE and PUB for sewage and sanitation operation and maintenance including the adaptation of a national standard for septic tanks to the local supply market, development of an inspection procedure for new tanks and onsite systems compliance verification; iv) the establishment of a receiving environment monitoring system including groundwater and the coastal environment; v) targeting of WaSH awareness focusing on behaviors related to reducing open defecation, maintaining communal systems, and managing animal waste; and vi) activities such as capacity building, developing a register of on-site sanitation installations and increasing the septic tanks vacuum system fleet. The termination of rudimentary sanitation facilities with uncontrolled anaerobic treatment conditions will also help reduce GHG emissions. Potential risks associated with physical investments relate to i) increased waste entering the sewerage system; ii) groundwater contamination due to inadequate controls around septic tank and soak pit design, installation and management; iii) risks and impacts associated with minor construction works such as dust, noise and sedimentation, sourcing of materials, accidental leaks and spillage from pipeline damage either during the construction or operational phase, and minor occupational health and safety risks to workers (potentially including the transmission of COVID-19 when completing works in areas with a high population density); and iv) the use of water for flushing which is a finite and scarce resource in Kiribati. Potential risks relating to TA activities include i) inadequate response to poor monitoring results; and ii) missed opportunities or poor environmental outcomes through the inadequate integration of environmental considerations such as compliance with the ESF and good international industry practice (GIIP) in consultancy terms of reference (TOR) and bidding documents etc.. Lastly, there are potential risks associated with existing infrastructure and systems such as sewage outfalls and the removal of waste from septic tanks to an unspecified location or facility, which are relied upon by the project. An E&S audit will be completed during project preparation to ensure compliance with the ESF and identify any risks that might need to be addressed through project design. The Environmental Risk Rating has been classified as 'Substantial' as, whilst risks are expected to be small in scale, not located in a sensitive area and easily mitigated in a predictable manner through the implementation of the environmental and social impact assessment/environmental and social management plan (ESIA/ESMP) it is yet to be confirmed that the increased volume of sewage that will be discharged through the ocean outfall will not significantly impact on marine and coastal ecosystems.

Social Risk Rating

Moderate

The increased connections in sewerage areas of Betio, Bikenibeu and Bairiki to all households not yet connected, will have a positive impact to the community as it contributes to increase community sanitation and health. The social risk is moderate, due to minor civil works that will be undertaken with the set up of household on-site sanitation system, the construction of toilets, septic tanks, soak-away pits, and the toilet superstructure. Social tension may rise and pose some risk during the building of communal toilets in areas where land is scarce. While the project does not anticipate any land acquisition, there may be some risk to land access or land use. Since the risks to land impact are low, the ESIA/ESMP will capture the impacts on land access/use, at site specific areas including the islets of Nanikai, Teaoraereke west, Bikenibeu East, Bikenibeu West and part of Bikenibeu Central South, and associated

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community mobilization activities, where the construction of household on-site sanitation systems, decentralized sanitation systems and communal toilets are planned. Behavioral change, risk of transmission of diseases related to change in health and unsanitary practices may also increase social tensions. The project locations still have traditional or makeshift houses where access is difficult ; limited space for new infrastructure; and community acceptance of open defecation. Despite the project’s aim to improve sanitation and MISE’s standard design ensuring communal toilet blocks are female and child friendly and accessible for the disabled and elderly, there is a risk of SEA/SH. While Kiribati has a high background rates of Gender-based Violence (GBV) and SEA/SH, the project’s SEA/SH rating is low due to a moderate scale of construction activities, limited labor influx, and location of civil works in an urban area. The Project’s ESIA/ESMP will include a SEA/SH risk assessment and preventive measures. There are functional GBV & SEA/SH services operating in South Tarawa (the Kiribati Family Health Association). A key risk is that marginalized, vulnerable or remote social groups are unable to access facilities and services in a way that undermines the central objectives of the project. COVID-19 quarantine measures could pose challenges by directly interrupting the implementation of project activities and result in delays. To mitigate these risks, the ESIA/ESMP, commits to ensuring access to and allocation of Project benefits in a fair, equitable and inclusive manner, taking into account disadvantaged or vulnerable groups and those in remote areas. As a mitigation measure, a social screening checklist is to be used to assess potential ESS5 related impacts and prepare mitigation measures as appropriate, outreach and awareness under the project will include pro-poor financing mechanisms such as revolving funds to improve access to sanitation facilities. This will be established and managed by MISE to enable poor households to purchase toilets. Criteria for accessing funding and verification of its use by poor households will be established during project preparation. The project has also added an outcome indicator to measure “Number of communities certified Open Defecation Free” which will help to verify sanitation access for poor households. The awareness campaign (Component 3) is a positive social and behavior change activity for the project and is likely to benefit the community with transformations in the population’s sanitation behavior. This will be an extension of the current WaSH Awareness Program (WAP) that will be initiated under STWSP. An international NGO will be engaged and will implement the awareness campaigns with the support of local CSOs at the community level. The ESCP will commit MISE to the implementation of a Code of Conduct for MISE staff and contracted workers including provisions for SEA/SH prevention e.g. via training curricula, campaign awareness.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

This standard is relevant.

The project is expected to result in positive environmental and social impacts as it seeks to increase access to sanitation services in selected areas of South Tarawa and to improve the PUB’s efficiency in sanitation service delivery, including increased connections to the existing sewerage system, construction of on-site sanitation systems, building the capacity at the sector level, providing sanitation and hygiene awareness and education as well as strengthen the institutional capacity of MISE.



Project activities also present environmental, social, and health and safety risks for the project workforce, communities and the environment. Project risks relate to: i) water contamination from fecal coliforms coliforms and associated exposure risks; ii) environmental, occupational health and safety, and community health and safety risks and impacts associated with minor construction works; iii) land use and access; iv) SEA/SH; and v) equitable access to project benefits for marginalized, vulnerable or remote social groups.

To manage these risks MISE will assess and manage environmental and social risks and impacts associated with proposed Project activities in a manner which is proportionate to the significance of the potential risks and impacts, during Project preparation. As such, the project will prepare and implement the following instruments.

A preliminary ESIA/ESMP will be prepared during project preparation to assess the risks and impacts associated with the sub-projects and finalized on completion of design works and prior to the commencement of physical works. The ESIA/ESMP will include mitigation, monitoring, and institutional measures to be taken during implementation and operation of the Project to eliminate adverse environmental, health and safety and social risks and impacts, offset them or reduce them to acceptable levels.

There are potential risks associated with existing infrastructure and systems such as the recently upgraded sewage outfalls and the removal of waste from septic tanks to an unspecified location or facility, which are relied upon by the project. The design of the three ocean outfalls was based on the findings of a pollution diffusion modeling study and works were financed by the ADB South Tarawa Sanitation Improvement Project however, it is yet to be confirmed that the increased volume of sewage that will be discharged through the ocean outfall will not significantly impact on marine and coastal ecosystems. Poor transport and disposal practices for the disposal of septic waste may lead to spills, adverse health impacts and the contamination of receptors such as groundwater or the coastal ecosystem. Leakages or inappropriate disposal of water from the saltwater flushing system also pose the risk of groundwater salinization. An E&S audit will be completed during project preparation to determine the nature and extent of E&S areas of concern and to identify appropriate measures and actions to mitigate the areas of concern, estimate the cost of these measures and recommend a schedule for implementation. The E&S Audit will be included in the Preliminary ESIA/ESMP.

A stakeholder engagement plan (SEP) will be developed during project preparation to outline a structured approach for community outreach and two-way engagement with stakeholders, in appropriate languages, including the vulnerable and disadvantaged groups (poor, disabled, elderly, isolated communities), and will be based upon meaningful consultation and disclosure of appropriate information. The SEP will include a beneficiary friendly and publicly accessible Grievance mechanism (GM).

A Labor Management Procedure (LMP) will be developed to outline various types of project workers including NGOs involved in supporting tasks, during project preparation, it will also outline proper working conditions and management of worker relationships, occupational health and safety, and to prevent sexual exploitation and abuse and sexual harassment during the minor civil works that are envisaged for the project.

The project will include Technical Assistance activities under components 2 and 4. As described in the PCN, through component 2, technical assistance support will also be provided to strengthen PUB capacity on areas such as sewerage billing, customer management and assets management, in complement of STWSP.



Under component 4, TA will also support the provision of studies and technical assistance to clarify the sector legal framework, in particular the role of local councils in sanitation, and to strengthen sanitation sector regulation, including in the areas of water quality monitoring and compliance of on-site systems.

The E&S Specialists will (i) screen TA activities to ensure that they will not support downstream impacts included in the ESCP and reflect key E&S aspects and risks and mitigation measures including ESF and relevant local legal and GIIP requirements in consultancy TOR and bidding documents; and (ii) review TA outputs to ensure compliance with ESF and relevant local legal and GIIP requirements. World Bank E&S Specialists will review consultancy TORs and outputs to provide a 'No Objection' prior to finalization to ensure compliance with ESF and relevant local legal and GIIP Requirements.

A Contractor Environmental and Social Management Plan (CESMP) will be prepared by primary contracting companies completing civil/construction works in compliance with both the ESIA/ESMP and local legislation prior to the commencement of civil works and minor construction activities. The ESCP will require that the GoK ensures that these plans are then finalized and approved prior to the commencement of works.

Areas where “Use of Borrower Framework” is being considered:

NA

ESS10 Stakeholder Engagement and Information Disclosure

This standard is relevant.

The E&S specialist in the KFSU will submit an SEP. The preparation of the ESIA/ESMP will inform the SEP which will be prepared in a manner that is accessible and culturally appropriate, considering any specific needs of groups that may be differentially or disproportionately affected by the project. The SEP will outline a) who the key stakeholders are; b) how they are to be engaged including methods, tools, techniques, and channels such as radio and social media; c) how often the engagement will occur throughout the project; d) how feedback will be solicited, recorded and monitored over the project; e) who will be charged/responsible with this engagement; f) timeline for this engagement, g) resources for engagement, and so on.

The SEP, will be prepared and cleared by appraisal. The process of stakeholder engagement will begin during preparation and continue into implementation. Prior to appraisal, the following measures will be implemented: i) stakeholder identification and analysis and ii) planning how the engagement with stakeholders, iii) disclosure of information and iv) consultation with stakeholders. The SEP is expected to be updated from time to time as/if necessary. The SEP will also describe the measures that will be used to remove obstacles to participation, and how the views of differently affected groups will be captured. . The SEP will identify vulnerable and disadvantaged groups/ households that require specific attention in providing improved sanitation services The Borrower will propose and implement a GRM to receive and facilitate the resolution of concerns and grievances.

Particular attention will be granted to identifying and providing tailored and culturally sensitive stakeholder engagement opportunities to vulnerable groups, disadvantaged and remote communities. This will include



meaningful consultation with remote island communities, community-based organizations and religious groups. If significant changes are made to the SEP after consultations, a publicly consulted, revised/updated SEP will be disclosed prior to appraisal. The final SEP (and GM) will be shared with relevant stakeholders via culturally appropriate means (and having regard to language, logistical and technological constraints). The SEP (and GM) will also be disclosed via the MISE website.

Any risks of COVID-19 and restrictions that may be imposed on public consultations during project preparation and implementation, will apply safety measures such as reducing the number of people gathering in one place, including social distancing and wearing of masks. Virtual platforms of engagement may be arranged for high level stakeholder consultations. Other forms of consultation in the community may apply such as small group consultation.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

This standard is relevant.

The project components include minor civil works that include retrofitting of the saltwater flushing system to dispose current standpipes and connect directly to toilets, installation of toilets in households, the construction of household on-site sanitation systems, decentralized sanitation systems and communal toilets (septic tanks, soak-away pits, and the toilet superstructure). The project proposes that infrastructure in each village will include a mixture of private toilets with septic tank, cluster sewage systems and communal toilets.

The workers involved in the project include different types of foreign consultants, NGOs CSOs for the community mobilization/ awareness campaigns and the following categories: direct workers, contract workers, community workers and primary suppliers. Direct workers are those employed by the civil service, which will include employees of the Project Management Unit (PMU), the government-run health facilities. Contracted workers will likely include selected private providers and contracted departmental workers. It is not known if workers will be directly hired from the community, this is an option to be considered. Community workers will include community workers, CSOs and there will be primary suppliers of goods and services. Under component 3, an international NGO will be recruited under the project and will implement the awareness campaigns with the support of local Civil Society Organizations at the community level.

Further details on these categories and who will be included will be found in the LMP. Civil servants working in the PMU will remain subject to the terms and conditions of their existing sector employment; additional staff will be hired to support the Project, they will be subject to the full requirements of ESS2, including appropriate terms and conditions of employment, nondiscrimination and equal opportunity (which includes a safe work environment free from violence and sexual harassment), workers' organizations, restrictions on child and forced labor, and occupational health and safety.



Likewise, any technical consultants contracted by the Project will also need to adhere to such standards. In addition, the Project will need to develop and implement written labor management procedures that will set out the ways in which project workers will be managed, including consultants and contractors. The project LMP will also establish labor guidelines for all categories of workers, and will include a Code of Conduct and functional GM for labor grievances, drawing on national laws and regulations and international best practices, as well as ESS 2 to manage employment-related complaints. Measures will be included in the LMP to ensure no child or forced labor will be used by any category of project workers, including contractors and community workforces. The GM will likewise be drafted to take into account risks for and address potential cases of SEA/SH in the workplace. Children under the age of 18 will be prohibited from completing construction/demolition works or any other task where they might come into contact with COVID-19 due to the hazardous nature of the work.

Construction may result in occupational health and safety risks and impacts (including the transmission of COVID-19 should any cases occur in Kiribati and the potential for exposure to sewage and the associated pathogens during works as well as those more generally associated with minor construction works such as from the operation of mobile plant, exposure to dust and noise and disturbance of buried pipes and cables etc.) which will be addressed through the implementation of the ESIA/ESMP in line with local legislation, the EHS Guidelines and GIIP. In addition, the ESCP will require the development and implementation of CESMPs by primary contracting companies.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant.

A study on the vulnerability of the freshwater lens on Tarawa completed by MISE notes that the quality of the water from wells, especially, in urban areas (Betio, Bairiki and Bikenibeu), is deteriorating with high fecal coliform counts and that sources of pollution are septic tanks; pit toilets; leachate from solid waste; and organic and inorganic pollutants from congested and developed areas. Similar issues are experienced in both the lagoon and coastal environments. Groundwater is the primary source of drinking water in South Tarawa and the lagoon and coastal areas are the main source of protein. South Tarawa has three sewerage systems coupled with seawater supply networks for flushing in the historical settlement centers of Betio, Bairiki and Bikenibeu. Connection rate to the sewerage networks has remained low (only 18 percent of the population is served) due to the lack of financial support or incentive to facilitate household connections. Lack of standards, regulation and training on design and construction has led to many poorly constructed on-site sanitation systems. Many of these systems are unable to be emptied due to poor structural integrity, lack of a sealed base or no access for a vacuum truck; these households may resort to burying their waste or making a new toilet with a drum, which poses a risk to groundwater quality. For households close to an access road, PUB offers a vacuum truck service for emptying septic tanks. All sewage (from sewerage systems and from septic tanks) is discharged untreated through ocean outfalls.

Component 1 will finance: (i) household sewer connections to the existing sanitation network; (ii) retrofit of the saltwater flushing system to dispose current standpipes and connect directly to toilets; and (iii) toilet provision to poor households currently practicing open defecation. As such, it will provide considerable environmental benefits through reducing contamination such as fecal coliforms to groundwater and the coastal and lagoon environments from open defecation or poor sewage and septic system management. The termination of rudimentary sanitation



facilities with uncontrolled anaerobic treatment conditions will also help reduce GHG emissions. Potential risks relate to i) increased waste entering the sewerage system and the potential for inadequacy of the existing system impacting receptors (lagoon or groundwater); ii) groundwater contamination due to inadequate controls around septic tank and soak pit design, installation and operation, poor maintenance of the existing sanitation network, leaks/poor management of saltwater flushing or the inappropriate siting of toilets; iii) environmental risks and impacts associated with minor construction works such as dust, noise and sedimentation and the sourcing of materials; accidental leaks and spillage from pipeline damage either during the construction or operational phase; and iv) the use of water for flushing which is a finite and scarce resource in Kiribati. There is limited baseline data available creating challenges in segregating historical groundwater contamination from either impacts or improvements that might result from the Bank-financed works.

The above risks and impacts will be mitigated through i) the Project will assess options for diverse water sources (including saltwater and greywater) for flushing to minimize impact on the groundwater lenses; ii) the design and implementation of a receiving environment (ground and coastal waters) monitoring system; and iii) the development and implementation of an ESIA/ESMP which will in turn inform design and bidding documents. It is expected that the risk of the increased sewage loading impacting the receiving environment is minimal as sewage is currently discharged through three ocean outfalls which have recently been upgraded to diffuse 30 meters deep, beyond the reef edge. Design was based on the findings of a pollution diffusion modeling study and works were financed by the ADB South Tarawa Sanitation Improvement Project. However, further due diligence will be completed through the completion of an E&S audit during project preparation for inclusion in the preliminary ESIA/ESMP. The project will finance minor construction works only and as such the sourcing of materials is not expected to pose a significant risk with the majority of materials being imported. Additional detail will be considered in the ESIA/ESMP with a focus on any sand or gravel extraction which can either be imported or is permitted from the Dai-Nippon causeway channel near Betio (sand) or from the ocean beach at the eastern end of Temaiku and Bonriki (gravel) under local legislation.

Component 2 will have considerable environmental benefits through increasing the capacity of both MISE and PUB for sewage and sanitation operation and maintenance including the adaptation of a national standard for septic tanks to the local supply market, and development of an inspection procedure for new tanks and onsite systems compliance verification. The component also includes the establishment of monitoring system for both groundwater and the marine environment as potential receptors of sewage contamination. It is intended that monitoring data will be used by PUB to incorporate into their strategies for community engagement and management of the groundwater lens. The importance of having a system in place to respond to poor water quality results was noted during the inception mission and it was agreed that this would be scoped during project preparation. It was also noted that MELAD currently reference international standards for water quality but are developing their own standard that will consider both receiving environments (groundwater and marine) and discharges. E&S Specialists will screen and review the above technical assistance activities to ensure that risk mitigation measures and environmental improvement opportunities are integrated into project design including to bidding documents and TORs etc. and that ESF requirements and GIIP are considered.

Component 3 will target WaSH awareness focusing on behaviors related to reducing open defecation, maintaining communal systems, and managing animal waste which are all key contributors to groundwater lens contamination.



The Climate Disaster and Risk Screening Tool was completed to help consider long and short term climate and disaster risks. Droughts and low water availability have historically caused issues with adequate water supply for flushing and to mitigate this (as well as reduce the pressure on the limited potable water supply) the sewage system has been designed for saltwater flushing and the Project includes improvements to the pipework of the salt water flushing system. It is thought that the impact of heavy rainfall events (e.g. inundation of the sewage network) will also be unlikely to increase in the future due to the completion of project activities.

ESS4 Community Health and Safety

This standard is relevant.

The project activities will finance services for the community in South Tarawa and will result in an overall positive outcomes and impacts on community health, particularly through i) a reduction in contamination (such as fecal coliforms) to the groundwater lens and coastal and lagoon environments through poor sewage and septic tank management and open defecation (noting that the groundwater lens is currently the main source of drinking water and majority of protein for local consumption is sourced from the lagoon and coastal environments); ii) the deterring of unsafe water consumption; iii) increased household sewer connections; iv) toilet provision to poor households; and v) WaSH/ menstrual hygiene management transformations.

The risks to the community health and safety under this component are moderate. Risks and impacts might include: i) the misuse and potential vandalism of public property such as the communal toilets, this may also raise tensions among the community especially creating a divide between certain groups (elderly, youth, vulnerable, disabled etc.); ii) increased exposure to viruses such as COVID-19 or other diseases through high rates of interaction with households during sewer system and toilet provision to poor households in populated areas; iii) exposure to waterborne diseases and pathogens from use of gray water for flushing and badly constructed septic tanks and seepage systems and subsequent water lens contamination, or leaks / damage to sewerage resulting in exposure to raw sewage; and iv) and some health and safety risks such as exposure to small levels of dust and noise during minor construction works.

During the current pandemic, protecting the health of communities from infection with COVID-19 is important. There are currently no cases of COVID-19 in Kiribati however, there is always the risk of community infection through returning travelers etc.. As such, without adequate controls and procedures, project activities have the potential to contribute to the spread of the virus and may also contribute to conflict or civil unrest. Some project activities may give rise to the risk of GBV, in particular, SEA/SH risks for the communities in South Tarawa, where the population is overpopulated (Betio, Bikenibeu and Bairiki).

Community engagement is critical under each component of the project as the support from the community will help the success of the project. Mitigation measures for the above risks and impacts will be identified and captured in the ESIA/ESMP.

The Climate Disaster and Risk Screening Tool was completed to help consider long and short term climate and disaster risks. The assessment noted that average temperatures and rainfall are both expected to increase including



more extreme rain events, the mean drought index is increasing, satellite data has indicated that sea level has risen by 1-4mm per year since 1993 and there is a high level of confidence that sea level will continue to rise. Droughts and low water availability have historically caused issues with adequate water supply for flushing and to mitigate this (as well as reduce the pressure on the limited potable water supply) the sewage system has been designed for saltwater flushing and the Project includes improvements to the pipework of the salt water flushing system. It is thought that the impact of heavy rainfall events (e.g. inundation of the sewage network) will also be unlikely to increase in the future due to the completion of project activities.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This standard is relevant.

While the land impacts are minimal, there is a potential for land access and land to be used for the services that will be provided under the project, such as communal toilets. It is not known how the community will agree on the selected sites where communal toilets will be constructed. There is a potential for the shared facility to raise some risks because of the 'shared' aspect of the service. Some households may have to provide access through their property to access the communal toilets or even provide use of some of their land for others to access the communal toilets. A social screening checklist is to be used to assess potential ESS 5 related impacts and prepare mitigation measures as appropriate

As there is a potential to have some minimal land access/land use, this will be included into the ESIA/ESMP. A resettlement plan is not required due to the nature and scope of the activity (minimal land impact). The site of the project is located on the main island of Tarawa and not on any outer islands, the activities will take place on land that is already disturbed and in use. No private land acquisition is anticipated. The communal toilets will be placed on sites where household share existing communal space. Community consultations will take place during the preparation, implementation of the project to ensure that all parties involved are in agreement with the land use/land access on which project activities will take place.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is relevant.

Construction and civil works will be completed on previously disturbed land so will not impact terrestrial biodiversity.

Mangrove and coral ecosystems have high ecological significance in the Tarawa area. Mangroves occur on reef mud flats at certain areas of the lagoon margins and provide a coastal protection function as well as an important habitat for marine organisms. Seagrass beds, which provide an important habitat for shellfish and other organisms, occur extensively within the lagoon particularly toward the southeast. Coral reefs surrounding the atoll and within the lagoon provide habitat to reef fish species and other marine species, including turtles, supporting a complex and bio-diverse community. No mangroves or seagrass are located within the vicinity of the sewerage outfalls however, the Project will increase the volume of sewage waste that is discharged to the coastal environment and may impact



biodiversity. Contamination of the marine environment from sewage waste can result in: i) increased biological oxygen demand (BOD) leading to hypoxic deadzones and increased turbidity killing marine organisms; ii) eutrophication leading to algal or phytoplankton blooms; and iii) the infection of protein sources such as shellfish with disease causing bacteria and parasites.

Sewage is currently discharged through three ocean outfalls which have recently been upgraded to diffuse 30 meters deep, beyond the reef edge. Design was based on the findings of a pollution diffusion modeling study and works were financed by ADB South Tarawa Sanitation Improvement Project. Further due diligence will be completed through the completion of an E&S audit during project preparation for inclusion in the preliminary ESIA/ESMP including confirmation that diffusion modeling is appropriate for the project discharge volumes and rates, the nature and extent of any other E&S areas of concern and appropriate measures and actions to mitigate the areas of concern including through project design.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This standard is not considered relevant. There are no known groups that meet the criteria in ESS7 as the majority of people in Kiribati, 96.2% belong to the i-Kiribati ethnic group, who will be the overwhelming beneficiaries for the project.

ESS8 Cultural Heritage

This standard is not considered relevant. The footprint of the infrastructure will avoid cultural heritage sites. The ESIA/ESMP will include a chance find procedure.

ESS9 Financial Intermediaries

This standard is not considered relevant as financial intermediaries will not be used by the Project.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?	No
Financing Partners	

Public Disclosure



NA

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:

Preliminary ESIA/ESMP (including an E&S audit) to be developed, disclosed, and consulted.

SEP to be developed, disclosed, and consulted.

LMP to be developed, disclosed, and consulted.

ESCP to be developed, disclosed, and consulted.

Set-up and operationalization of the project-level GRM.

E&S Specialists will screen (TA) activities and TA outputs to ensure compliance with ESF and relevant local legal and GIIP requirements.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

Regular reporting.

Notification of incidents and accidents.

Prepare, disclose, consult, adopt, and implement the Final ESIA/ESMP prior to the commencement of works.

E&S Specialists will screen (TA) activities and TA outputs to ensure compliance with ESF and relevant local legal and GIIP requirements.

Include ESF implementation capacity building trainings for the staff in the implementing partner agencies

Incorporate environmental and social management plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts, and develop, implement and/or supervise CESMPs.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

12-Jan-2022

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Ministry of Finance and Economic Development

Implementing Agency(ies)

Public Disclosure



Implementing Agency: Ministry of Infrastructure and Sustainable Energy

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Raghava Neti
Practice Manager (ENR/Social)	Ann Jeannette Glauber Recommended on 20-Aug-2021 at 20:54:29 GMT-04:00
Safeguards Advisor ESSA	Nina Chee (SAESSA) Cleared on 23-Aug-2021 at 11:24:42 GMT-04:00