



Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 22-Mar-2019 | Report No: PIDISDSA24840



BASIC INFORMATION

A. Basic Project Data

Country Marshall Islands	Project ID P161382	Project Name Marshall Islands Maritime Investment Project	Parent Project ID (if any)
Region EAST ASIA AND PACIFIC	Estimated Appraisal Date 25-Mar-2019	Estimated Board Date 14-May-2019	Practice Area (Lead) Transport
Financing Instrument Investment Project Financing	Borrower(s) Republic of the Marshall Islands	Implementing Agency Ministry of Transport and Communications, Ministry of Finance, Ministry of Justice	

Proposed Development Objective(s)

To improve the safety, efficiency and climate resilience of maritime infrastructure and operations in the Recipient's territory, and in the event of an Eligible Crisis or Emergency, to provide an immediate response to the Eligible Crisis or Emergency.

Components

Maritime Infrastructure
Maritime Safety and Security
Technical Assistance for Port Planning and Project Management
Contingency Emergency Response Component

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	33.12
Total Financing	33.12
of which IBRD/IDA	33.12
Financing Gap	0.00

DETAILS

World Bank Group Financing



International Development Association (IDA)	33.12
IDA Grant	33.12

Environmental Assessment Category

B-Partial Assessment

Decision

The review did authorize the team to appraise and negotiate

B. Introduction and Context

Country Context

1. The Republic of the Marshall Islands (RMI) is located approximately midway between Hawaii and the Philippines and is one of the world’s smallest, most isolated and vulnerable nations. The country consists of 29 atolls and 5 isolated islands (a total of 24 are inhabited) plus numerous small islets. The country covers an area of 1.9 million square km but has just 181 square km in land area. RMI is vulnerable to occasional typhoons, and its coastline of 370 km renders it susceptible to extreme waves and high tides.
2. RMI’s population totals about 53,125 (2017)¹, of which about 28,000 (53 percent) reside in Majuro (the country’s capital) and about 9,600 (18 percent) in Ebeye. The migration from the outer islands to the urban centers of Majuro and Ebeye is primarily due to: (i) lack of employment opportunities in other locations; and, (ii) greater reliance on the cash economy as compared to a subsistence lifestyle. Concurrently, the combination of declining incomes and rising costs of living is causing Marshallese residents to leave the country for better jobs and educational opportunities abroad, mainly in Hawaii, United States mainland and Guam. Although between 1980 and 1988 RMI’s population increased about 5 percent per annum, it has since leveled off, with increases of one-half of one percent or less per annum from 1989 to the present day.

Sectoral and Institutional Context

3. **Sectoral Context.** Given RMI’s geographic characteristics and distant outer islands, the provision of efficient, reliable and affordable sea transport services is considered essential for the country’s basic economic and social functions, and to achieving RMI’s national development plans. A fundamental requirement for providing intra-island shipping services is safe, well-functioning maritime transport infrastructure and assets, including wharfs, docks and jetties. Combined, maritime services and assets underpin inclusive economic growth and social development by providing RMI’s communities with reliable access to economic opportunities, services and information.

¹ World Development Indicators database last updated 9/21/2018.



4. Majuro is regularly served by international cargo services from the U.S., Asia and Australia. Annual cargo throughput in terms of the total number of twenty-foot equivalent units (TEUs) was 10,610 in 2013 but increased to 12,169 in 2015. About half of the TEUs came from the U.S., 40 percent from Asia, and the balance from Australia, New Zealand and Fiji. Majuro is the largest regional tuna transshipment port and transshipped 600,000 metric tons of tuna in 2016. Fishing vessels make-up as much as 75 percent of vessel traffic calling at Majuro. Typically, refrigerated “mother vessels” harvest tuna and, when full, transship fish to larger carrier ships that are anchored in the Majuro lagoon. Most have an average stay of ten days.
5. There are two principal docks (ports) at Majuro: (i) Delap Dock for international cargo; and, (ii) Uliga Dock for domestic passengers and cargo. Delap Dock is the hub of RMI’s cash economy and serves as the gateway for imports and exports that support the livelihoods of RMI residents, private business, and government agencies. It is accessed through a deep-water channel and well-protected lagoon. The dock predominantly serves international cargo vessels that deliver a wide variety of imported food and household items, construction equipment and materials, and diesel fuel. International cargo vessels call at Delap Dock an average of once per week, while tankers deliver fuel about once per month. Intra-island cargo vessels periodically offload copra to the dock, where it is delivered to a coconut processing operation located on the northeast side of Delap Dock. A limited number of other international vessels use Delap Dock to load locally produced coconut oil. International fishing vessels also make occasional use of Delap Dock for purse seine² net repairs, fuel resupplies, and vessel maintenance. The international wharf is not equipped with shore or mobile cranes, necessitating vessels calling at the dock to have their own equipment.
6. Delap Dock has been designated as being largely compliant with the International Ship and Port Facility Security (ISPS) Code, which is a set of measures to enhance the security of ships and port facilities. However, formal regulations governing activities at the port are lacking, and the dock has been operating under informal regulations for a considerable time.
7. Climate change poses increasing threats to maritime infrastructure assets and operations in Majuro. Sea level rise accelerates the rate of coastal erosion which exacerbates the deterioration of key port infrastructure as the foundation soils of these infrastructure displaces over time. Paved assets such as container yard are put under higher physical stress with the increasing frequency and intensity of coastal flooding and extreme heatwaves. The capacity of drainage systems needs to be expanded and strengthened to prevent paved assets from frequent inundation and subsequent decay. Pavement material needs to be more resilient to extreme temperature to mitigate the risk of melting. While the costs for maintenance of port infrastructure may increase, it is essential to plan and implement maintenance schemes systematically to prevent more costly rehabilitation and reconstruction in the future.
8. From an operational perspective, increasing extreme climatic events such as heavy rainfall, typhoons, and storm surges, will disrupt port operations more often and subsequently affect port service performance. Extreme weather events and changes in key variables such as prevailing winds, waves, and currents pose challenges for sailing navigation and potential safety hazards for ship, cargo, and crew. The impact of

² A purse seine is a wall of netting that is released around a school of fish. The seine has floats along the top line with a lead line threaded through rings along the bottom. Once a school of fish is identified, a small boat encircles the school with the net.



climate change variables to maritime infrastructure and operations needs to be systematically incorporated into the planning and development of future maritime activities, including protective structures, preparation of warning and emergency response systems, and the increased monitoring of infrastructure conditions compound with rigorous maintenance schemes. Climate change therefore needs to be embedded as a key parameter for infrastructure planning, maritime operational efficiency, and maritime safety and security.

9. **Institutional Context.** At the national level, the Ministry of Transport and Communications (MoTC) is responsible for policymaking and some regulatory oversight, as well as the management and development of the maritime sector in RMI. However, there is no up-to-date maritime transport sector policy and MoTC does not have a harbor master with a mandate to oversee RMI's ports. MoTC also manages intra-island shipping services by contracting them out to private ship operators to make voyages into the designated shipping region.
10. The Republic of the Marshall Islands Ports Authority (RMIPA) is a state-owned entity, which is responsible for operating RMI's publicly-owned seaports at Majuro, Ebeye, Arno, Jaluit and Wotje, as well as all facilities and structures situated within public port and airport areas. In addition to operational responsibilities, RMIPA carries out regulatory and enforcement functions related to port use and vessel activities.

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

11. To improve the safety, efficiency and climate resilience of maritime infrastructure and operations in the Republic of the Marshall Islands, and in the event of an Eligible Crisis or Emergency, to provide an immediate response to the Eligible Crisis or Emergency.

Key Results

12. To monitor progress toward the PDO, the following set of indicators has been identified:
 - (a) Reduction in cargo vessel turnaround times at Delap Dock (minutes);
 - (b) Container yard productivity (moves/hour);
 - (c) Project docks fully compliant with ISPS requirements (number);
 - (d) Project docks rehabilitated with at least one climate resilience measure (number);
 - (e) Ports with sectoral and contingency planning tools that address natural disasters and climate change (number).

D. Project Description

13. The overall amount of funding for MIMIP is US\$33.12 million equivalent, which includes US\$15.75 million in National IDA and US\$17.37 million in Regional IDA. The project will improve the safety and efficiency of maritime operations and enhance resilience of maritime transport and of local communities to the impacts of climate change through: (i) investments to improve port infrastructure and maritime services; (ii) activities to strengthen safety and security of navigation and ports operations; and, (iii) technical



assistance to supervise works, support project implementation, and develop local capacity to manage a more safe, efficient and climate resilient maritime sector. A Contingency Emergency Response Component (CERC) is also included within MIMIP to enable funds to quickly be reallocated to respond to emergency events.

14. It is important to note that while the types of activities and investments to be carried out under MIMIP are known, the extent of the works that can be completed will depend on the results of the strategic planning exercise and conditional assessment of maritime assets, both of which will be carried out during the first two years of implementation. As such, the cost of proposed investments will not be known until MIMIP is under implementation, and the available funding may not be sufficient to finance all proposed investments. The following table presents estimated cost per component and funding source.
15. The project consists of the following components:
 - (a) **Component 1: Maritime Infrastructure (est. US\$12.35 million).** Investments under Component 1 will improve the safety and efficiency of dock and port operations, as well as enhance the resilience of maritime structures to natural disasters and climate change impacts through the integration of planning, design, construction, rehabilitation and operation of facilities. The following sub-components are planned:
 - 1.1 Majuro and Delap Dock.
 - 1.2 Uliga Dock.
 - 1.3 Outer islands.
 - 1.4 Acquire equipment.
 - (b) **Component 2: Maritime Safety and Security (est. US\$7.65 million).** Component 2 will strengthen safety and security of maritime transport and support enhanced climate resilience of maritime facilities and for local communities by improving the reliability of connections between Majuro and outer islands for access to food, water, fuel, and emergency response services.
 - 2.1 Quay wall structures and furniture at Delap, Ulinga and Ebeye Docks.
 - 2.2 Compliance with ISPS requirements.
 - 2.3 Replace/Upgrade AtoNs.
 - 2.4 Safety and security improvements.
 - (c) **Component 3: Technical Assistance for Port Planning and Project Management (est. US\$13.12 million).** Component 3 will enhance the capacity of Government and RMIPA to manage maritime assets in a more safe, efficient and climate resilient manner through technical assistance designed to strengthen the planning and management of climate resilient port facilities, improve coordination of emergency response systems, elevate awareness of ISPS and SAR requirements, and implement project activities.
 - 3.1 Design and supervision.
 - 3.2 Review of institutional and governance structures for port management.
 - 3.3 Strategic planning.
 - 3.4 Capacity building initiatives.
 - 3.5 Registries assessment and options analysis.
 - 3.6 Project management.³

³ Including providing support for the development and operationalization of the CIU. The estimated cost of the CIU over the 5-



3.7 Employment opportunities for women.

3.8 Emerging priority issues.

- (d) **Component 4: Contingency Emergency Response.** The CERC is designed to provide swift response in the event of an Eligible Crisis or Emergency by allowing a portion of undisbursed project funds to be reallocated to respond to natural disasters and/or other crises and emergencies. The CERC may be used following natural disasters or other crises and emergencies, allowing funds to be reallocated from other components of the project.

E. Implementation

Institutional and Implementation Arrangements

16. MIMIP will be implemented over a five-year period following Board approval. The Ministry of Finance (MoF) will be the Executing Agency. MoF will also be the IA for Sub-components 3(e) on the registries assessment and options analysis and 3(f) on project management support. The National Disaster Management Office (NDMO) will serve as the IA for Component 4 on the CERC. The Ministry of Justice (MoJ) will act as IA for Sub-component on trafficking. RMIPA, which is under MoTC, will act as the IA for all other Sub-components.
17. To oversee project implementation, RMIPA will appoint a PM. RMIPA will sign and manage all contracts with consultants, suppliers and contractors during project implementation. In addition, a focal point will be identified in MoJ to implement MIMIP's anti-trafficking component.
18. The IAs will be supported by the CIU, which will provide fiduciary (procurement and financial management) services, as well as input and guidance on social and environmental safeguards. The CIU has a Financial Management Specialist, a Procurement Specialist, and a Safeguards Specialist. MIMIP funding will be used to finance these positions throughout MIMIP's five-year implementation period.
19. A Project Steering Committee (PSC) will be formed to provide general oversight and policy direction to MIMIP stakeholders during project implementation, convene key stakeholders in the event of disagreement, and periodically review project progress. The PSC will be chaired by the Secretary of Finance, and members will include representatives of the MoF, the MoTC, RMIPA, and the Kwajalein Atoll Local Government. The PSC would meet at least twice a year, and more often as needed.
20. Under sub-component 3.6, MIMIP is supporting the development and operationalization of the CIU within DIDA. The World Bank portfolio in RMI has grown quickly and is anticipated to expand even further over the next few years putting pressure on the thin capacity within GoRMI to implement effectively. GoRMI identified early the need for strong implementation of the World Bank portfolio and to look for ways to maximize efficiencies. GoRMI have therefore decided to undertake a centralized approach to project implementation functions. Those core project implementation functions needed for all projects such as but not limited to procurement, financial management, social and environmental safeguards, monitoring and evaluation and outreach and communications will be considered as centralized functions to be

year project duration is estimated at US\$6.60 million.



housed within the CIU/DIDA. These positions will report to the CIU Program Manager and provide services and hand on support to all IAs for preparation, implementation and capacity building activities. The sub-component will also support some goods, procurement, training, and IOCs related to the functioning of the CIU.

F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

MIMIP will finance physical works at the main ports at Delap and Ulinga, Majuro, Ebeye (Kwajalien Atoll), and outer islands of Jaluit, Wotje and Arno. The ports are located in modified foreshore environments, mostly in urban areas, on Government-leased land. Neighboring land uses in Majuro include small-scale industrial land uses and at Delap include the Majuro Energy Company diesel power plant and fuel bunkers. The near-shore water quality and ecosystems are degraded due to urban runoff, reclamations and sea walls, dredging, poor waste management, and wastewater and ballast discharges from vessels in anchorage in the lagoon. Some remnant coral assemblages and sea grass areas are potentially within the area of influence and may be affected by storm water runoff or spills. Solid waste is poorly managed in the Marshall Islands because of lack of land for sanitary and secure burial. Any solid or hazardous waste created by the project (e.g., demolition materials) would exacerbate these issues, and therefore, would be exported for appropriate disposal or recycling. Local sand and aggregates are currently quarried from the foreshore and lagoon. This activity can exacerbate coastal erosion and inundation and degrade coral ecosystems. Creating demand for such materials can exacerbate these risks, and therefore, sustainable aggregate sources will need to be identified for this project. Strategic development plans and review and improvements to port operations will focus on Delap, Uliga and Ebeye, and governance and institutional strengthening across the agencies involved in the Sector. The fishing/shipping industry is a known source of demand for sex workers, as well as creating potential for unwanted solicitation and GBV. Imported workforces for construction and infrastructure projects are known to contribute to these issues. In RMI, prostitution is illegal, but provided informally and according to local NGOs is suspected to be a conduit for human trafficking (women are particularly at risk). NGOs have been working in this space to identify and manage these issues, generally increase awareness, and break-down taboos around the issues of gender based violence and other social issues in RMI. MIMIP includes support for these campaigns and training and other services in/to the maritime sector. As a result of a large amount of concurrent infrastructure and construction projects on Majuro and Ebeye, there may be cumulative impacts on the numbers of imported workers.

G. Environmental and Social Safeguards Specialists on the Team

Penelope Ruth Ferguson, Environmental Specialist
Ross James Butler, Social Specialist



SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>OP/BP 4.01 was triggered at Concept Stage and an Environmental and Social Management Plan (ESMP) and an Environmental and Social Management Framework (ESMF) prepared for the project. Consultations were held during the environmental assessment and on the draft instruments. The project has been screened as Category B as the impacts are considered moderate and readily prevented and mitigated. The ESMP has been prepared for the activities identified during project preparation and mostly relate to the physical works to upgrade the various ports. The ESMF has been prepared to provide a screening and risk management process for sub-projects that are identified following the strategic management planning processes and to inform the safeguards approaches to technical advisory activities.</p>
Performance Standards for Private Sector Activities OP/BP 4.03	No	<p>The project will not involve private sector, therefore, the policy is not triggered.</p>
Natural Habitats OP/BP 4.04	Yes	<p>OP/BP 4.04 was triggered at Concept Stage and an assessment of the impact of physical works and technical advisory on the marine ecosystem undertaken. The assessment concludes that the maritime habitat near the Delap, Ulinga, Ebeye and Jaluit ports is highly modified and degraded due to pollution, waste and sedimentation. Further impacts on these immediate environments will be negligible. Jaluit atoll is a RAMSAR site (Jaluit Atoll Conservation Area) with significant mangrove communities and habitats for critically endangered and vulnerable marine species. It is therefore a critical habitat. The proposed physical works in Jaluit are small scale to maintain the safety and efficiency of existing services and infrastructure and will not result in significant degradation or conversion of natural habitat. Remnant coral habitats in all lagoons beyond the immediate port area may be affected in the short term from contaminated storm water from earthworks and construction activities if not adequately managed, and in the long term from contaminated storm water drainage from the ports</p>



		or spill events. Mitigation measures in the ESMP address the design and operation of drainage and storm water treatment devices, erosion and sediment control measures, removal of waste, improved oil and fuel management procedures, and improved spill response skills and equipment, and ongoing monitoring, and are considered satisfactory for reducing short and long term risk to these habitats.
Forests OP/BP 4.36	No	The health and quality of mangroves in Jaluit atoll will not be adversely affected as they are not within the project area of influence. The project will not affect the rights and welfare of people who depend on mangroves, or will change the management of mangroves.
Pest Management OP 4.09	No	There will be no pest management under this project or the requirement to purchase and use pesticides.
Physical Cultural Resources OP/BP 4.11	No	The baseline surveys carried out as part of the ESIA process did not identify the presence of any physical cultural resources within the project's area of influence. All physical works will be within the dock boundaries, which are heavily modified environments. Hence, the policy is not triggered.
Indigenous Peoples OP/BP 4.10	Yes	Almost the entire population of Majuro is indigenous Marshallese. To ensure that the principles of the policy are addressed, the Stakeholder Engagement and Consultation Plan has been prepared in compliance with the policy and consistent with an Indigenous Peoples Policy Framework, reflecting a Free, Prior and Informed consultation approach that addresses the needs of vulnerable people and women. .
Involuntary Resettlement OP/BP 4.12	No	The project will not involve any new footprints for infrastructure. Accordingly, no land access issues are anticipated with the project and involuntary land acquisition or resettlement will not be required.
Safety of Dams OP/BP 4.37	No	This policy is not triggered as the project does not rely on a dam or will be affected by the operation of an existing dam.
Projects on International Waterways OP/BP 7.50	No	The project will not be implemented on any international waterways.
Projects in Disputed Areas OP/BP 7.60	No	There are no disputed areas in the project area of influence. This policy is not triggered.



KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The ESMF has been prepared to provide a screening and risk management process for sub-projects that are identified following the strategic management planning processes and to inform the safeguards approaches to technical advisory activities. The key environmental impacts identified in the environmental assessment are: (i) the existing and ongoing risks from oil spills, contaminated storm water and other pollution discharges to the marine environment further modifying the coral and sand environments nearby; (ii) the significant volumes of scrap metal and other solid waste at the ports; (iii) the potential to bring in biosecurity risks with equipment or fill; and, (iv) the potential for contaminated fill to be discovered during earthworks. Specific mitigation measures are included in the ESMP and ESMF to avoid any impacts on the critical habitat values of Jaluit atoll as a RAMSAR site. Minor impacts that will require management during construction include noise, dust, traffic-related safety, construction waste and interferences with other port operations. Environmental benefits, such as a reduction in the risk of oil spill and incidental releases of pollutants and waste into the marine environment, will be achieved through the removal of waste, provision of spill kits and booms, staff training and improved port operational procedures. The strategic management planning process may identify larger scale infrastructure investments that, in future, could produce more significant environmental impacts and the terms of reference will require an environmental and social assessment as part of the planning process.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area: The improvements in equipment, buildings, drainage, hardstand, safety, efficiency of operations, improvements in human trafficking avoidance and environmental management will contribute to improvements to environmental, health and safety risks for dock operations into the future. The technical advisory outputs for the project will focus on providing operational procedures to support ongoing management of these risks. Spill management equipment and training will improve the response to and clean-up of incidents, which will reduce the scale of impacts from future spills.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

The Marshall Islands Port Authority has no experience in World Bank safeguards policies. The DIDA CIU has an experienced Safeguards Advisor who supervised the ESMF, ESMP and consultations and will continue to provide support and oversight for the implementation of safeguards throughout the project. The Ports Authority will employ a local environmental and social specialist under the project and this person, with the support of the DIDA CIU Safeguards Advisor, will have the skills and resources to implement the safeguards instruments and the Stakeholder Engagement Plan.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.



The Project’s Stakeholder Engagement Plan has identified the key stakeholders as: Environmental Protection Authority, Marine Resources Authority, Department of Immigration, Ministry of Cultural and Internal Affairs, Island Councils and Mayors, Stevedore companies and shipping companies, Coastal Management Advisory Council, International Organization of Migration, and Women United Together Marshall Islands and church groups. Potentially affected people include passengers and businesses who use the docks or reside/work/gather food nearby. Vulnerable people were identified as boarding school children (travelling alone), men or women trafficked through ports or in the maritime sector (sexual or labor exploitation and migrant smuggling), those with mobility issues or vulnerabilities with accessing dock facilities, and women and elderly travelling without support. Representatives of the agencies and groups were invited to consultation meetings during project preparation on Majuro, Ebeye and Jaluit and feedback was included the project design, ESMF and ESMP. The Stakeholder Engagement Plan identifies strategies and programs for communicating with stakeholders, including representatives of vulnerable people and groups, throughout the project at key stages (design, strategic planning, pre-construction and construction phases).

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank 01-Mar-2019	Date of submission for disclosure 19-Mar-2019	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
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"In country" Disclosure

Marshall Islands
19-Mar-2019

Comments

Documents disclosed on RMI Ministry of Finance website.

Indigenous Peoples Development Plan/Framework

Date of receipt by the Bank 01-Mar-2019	Date of submission for disclosure 19-Mar-2019
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"In country" Disclosure

Marshall Islands
19-Mar-2019

Comments

Documents disclosed on RMI Ministry of Finance website.



C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?

Yes

If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?

Yes

Are the cost and the accountabilities for the EMP incorporated in the credit/loan?

Yes

OP/BP 4.04 - Natural Habitats

Would the project result in any significant conversion or degradation of critical natural habitats?

No

If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?

NA

OP/BP 4.10 - Indigenous Peoples

Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?

NA

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

Yes

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

Yes



All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

Yes

Have costs related to safeguard policy measures been included in the project cost?

Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

Yes

CONTACT POINT

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APPROVAL

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Approved By

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Country Director:	Pierre Graftieaux	22-Mar-2019