

Environmental and Social Monitoring Report

First Semiannual Report
January 2020

Nauru: Solar Power Development Project (Part 1)

Prepared by Nauru Utilities Corporation for the Government of Nauru and the Asian Development Bank.

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Environmental and Social Monitoring Report

Semiannual Safeguards Report
January 2020

**Nauru: Site Clearance Works and Preparation for
the Nauru Solar Power Development Project (July to
December 2019)**

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CURRENCY EQUIVALENTS

(as of 20 December 2019)

Currency unit	–	Australian Dollar
\$A1.00	=	\$US0.69
\$US1.00	=	\$A1.45

ABBREVIATIONS

ABF	–	Australian Border Force
ADB	–	Asian Development Bank
BESS	–	Battery Energy Storage System
DCIE	–	Department of Commerce, Industry, and Environment
EHS	–	Environment, Health & Safety
GHD	–	GHD Limited
IEE	–	Initial Environmental Examination
IES	–	International Environmental Specialist
LES	–	Local Environmental Specialist
MFAT	–	Ministry of Foreign Affairs and Trade
NRC	–	Nauru Rehabilitation Corporation
NUC	–	Nauru Utilities Corporation
PPE	–	Personal Protective Equipment
RPC	–	Regional Processing Centre
SEMP	–	Site-specific Environmental Management Plan
UXO		Unexploded ordnance

WEIGHTS AND MEASURES

kW AC	–	kilowatts air conditioner
MW	–	megawatt
MWh	–	megawatt hour
W DC	–	watts direct current
m	–	meter

NOTE{S}

- (i) The fiscal year (FY) of the Government of Nauru and its agencies ends on 30 June. FY before a calendar year denotes the year in which the fiscal year ends, e.g., FY2011 ends on 30 June 2011.
- (ii) In this report, "\$" refers to United States dollars unless otherwise stated}.

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I. INTRODUCTION

1. This report presents the Asian Development Bank (ADB) Nauru Solar Power Development Project Semi-Annual Safeguards Environmental and Social Monitoring Report for the July to December 2019 period. During the reporting period, site clearance and preparation activities are being undertaken by the Nauru Rehabilitation Corporation (NRC), hereon referred to as the 'Contractor', ahead of construction and installation works on behalf of Nauru Utilities Corporation (NUC).
2. This report is intended to report on the Contractor's implementation on environmental and social mitigation measures for the site clearance and preparation activities as stated in Site-specific Environmental Management Plan (SEMP). The SEMP (August 2019) was prepared by GHD Limited NZ (GHD) in collaboration with the Contractor, ahead of the mobilisation of site clearance works towards the end of August 2019.
3. This report presents a summary of the key activities, environmental and social monitoring progress, monitoring results, implementation of roles and responsibilities, reporting, consultations, grievances raised and documented, and capacity building efforts, for the July to December 2019 period.

II. PROJECT OVERVIEW

2.1 Background

4. The Nauru Solar Power Development Project comprises the installation of a 6.0 megawatt (MW) solar array combined with a 2.5 MWh/5.0 MW BESS. The project will require the installation of around 19,200 solar panels (360 W DC panels), 240 string inverters (25 kW AC), and two separate systems of 2.5 MW (1.25 MWh) capacity BESS, however this will be confirmed during the detailed design phase. The panels, batteries and inverters will be imported and transported into Nauru by sea. **Figure II-1** shows the site location.



Figure II-1. Site location and layout

2.2 Brief project description

5. The scope of works for site clearance and preparation activities by the Contractor comprise the following key steps:

- i) Identification of cadastral boundaries across the site and submission to NUC for notification of land ownership.
- ii) Identification of trees requiring compensation and notification to NUC in accordance with the Republic of Nauru *Lands Act 1976*.
- iii) Vegetation and waste clearance activities.
- iv) Removal of pinnacle rocks by methods of either using rock breaking equipment or by controlled blasting.
- v) After breaking or blasting of existing pinnacle rocks, using broken rock to backfill the voids below the pinnacle rock face at the designed level.
- vi) Remove excessive rock for crushing and further use for designed ground profile.
- vii) Levelling of material will be undertaken by a grader and roller equipment throughout the levelling progression of the entire site.
- viii) Payment of landowners for excess rock taken off site.

6. **Figure II-2** shows the work progression for site clearance and preparation activities. Phase 1 of the project is from Area 1 (blue) and end in Area 3 (pink). The direction of rock cutting and

backfill is also shown in **Figure II-2**. Starting in Area 1, from A1 working up to D1, has been predicted to take up to 6.5 months and will be levelled to 25 metres above sea level (masl). In Area 2 (green), starting at A2 and completing in B2 within 1.5 months will be levelled to 33 masl. Area 3, A3 and B3 will take approximately 1.1 months to complete with a reduced level of 36 masl. The total estimated clearing and levelling to complete Areas 1, 2 and 3 will be approximately 10 months. Phase 2 of the Project will commence after the completion of Area 3. For future expansion, works for Area 4 (black) are estimated to be completed within 4 months.

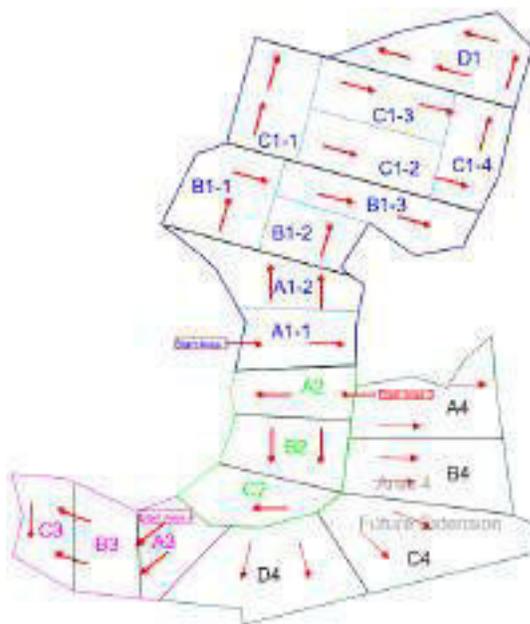


Figure II-2. Site clearance work progression

2.3 Progress during this reporting period

7. As of December 2019, project progress was around 50% of Area 1 complete for land clearing, rock breaking and levelling activities. Works were 80% completed for Areas A1-1, A1-2, B1-2, B1-3, C1-2 and C1-3. The sequence of work has lightly been altered to maximise the noise protection effect from the vegetation for the Regional Processing Centre (RPC) Camp 1.

8. Productivity during this period was irregular due to equipment breakdown and maintenance, however this was allowed for in the original program and the milestone of 70% of Area 1 is still achievable.

III. PROJECT CATEGORIZATION AND APPROVAL

9. The project was categorized as a Category “B” for environment, and Category C for involuntary resettlement and Indigenous Peoples, as per ADB’s *Safeguard Policy Statement* 2009. The Initial Environmental Examination (IEE) (May 2017) for the project was prepared in compliance to the ADB’s Safeguard Policy. The IEE was approved by the Department of Commerce, Industry, and Environment (DCIE) via email in June 2019.

10. Accordingly, the SEMP for the site clearance and preparation works was prepared by GHD, in collaboration with the Contractor, detailing environmental mitigation and monitoring for

managing anticipated potential environmental impacts. The SEMP was approved by DCIE via email August 2019.

IV. SCOPE OF PRESENT REPORT

11. This report presents the status of the environmental compliance of the project from July to December 2019. The scope of this report is to assess the compliance status on the environmental and social safeguards as per loan agreement during site clearance works, where works are in progress. The assessment of safeguards compliance covers the status of compliance and performance and effectiveness of implementation of environmental and social safeguards, as set out in the SEMP. This reports also includes progress updates on corrective actions outlined in the Due Diligence Report relating to land acquisition.

V. COMPLIANCE WITH NATIONAL REGULATIONS AND INTERNATIONAL STANDARDS

12. The project is governed by the applicable laws and regulations of Nauru and the Safeguards Policy Statement 2009 (SPS) of the ADB. The IEE (2017) states that all relevant Nauruan environmental and other legislations are applicable to the project. As of December 2019, no issues have been observed around conformance to national regulations or international standards.

VI. KEY ACTIVITIES JULY TO DECEMBER 2019

13. Key activities undertaken during the July to December 2019 period are summarised below. Detail and outcomes of these activities, where relevant, are provided in the subsequent sections of this report.

July 2019

- i) GHD were in-country 16 to 26 July. Key activities included the development of the SEMP in collaboration with the Contractor, development of the daily and weekly monitoring checklists, Contractor capacity building around environmental management and safeguards, pre-works consultations with RPC Camp 1 and Ronphos, meetings with the Contractor's Site Supervisor and Operations Manager, meeting with the Contractors Site Surveyor to discuss the process of cadastre boundary delineation and tree identification for compensation, introductory meeting with ADB representative, and presentation of the project to NUC at the weekly progress meeting.
- ii) GHD and Local Environmental Specialist (LES) initial dusk and dawn bird surveys in preparation of the desktop bird assessment and pre-vegetation clearance surveys.
- iii) Contractor identification of cadastral boundaries across the site and submission to NUC for notification of land ownership.
- iv) Contractor identification of trees requiring compensation and notification to NUC in accordance with the Republic of Nauru *Lands Act 1976*.

August 2019

- i) No GHD site visit.
- ii) Submission of the SEMP to DCIE for review and approval.

- iii) Notification of Works was published by the Government of Nauru on behalf of NUC on 6 August 2019. This notification provided contact information relating to the Grievance Redress Mechanism.
- iv) LES led pre-works consultation with RPC Camp 1 representatives and attended the NUC weekly project progress meeting.
- v) GHD submission a technical memorandum to support the pre-vegetation clearance bird surveys.
- vi) NUC commissioned UXO desktop risk assessment. No issues.
- vii) GHD noise specialist input on the issue around the potential for site clearance noise impact at RPC Camp 1.
- viii) Landowner lease signatures provided in August 2019, as confirmed by NUC, ahead of site clearance works commencing on 28 August.

September 2019

- i) Site clearance works commenced on 28 August 2019, following the mobilisation.
- ii) GHD were in-country 10 to 17 September. During this time, GHD with the LES, carried out daily site inspections, a pre-vegetation clearance bird nest survey, Contractor capacity building around environmental management and safeguards, and consultation with RPC Camp 1 and DCIE (requested).
- iii) Code of Conduct observed to be pinned up in the Contractor's workshop.
- iv) Daily and weekly EHS monitoring and reporting by the Site Supervisor and LES, respectively.

October 2019

- i) GHD were in-country 30 September to 6 October. During this time, GHD with the LES, carried out daily site inspections, a pre-vegetation clearance bird nest survey, Contractor capacity building around environmental management and safeguards, and consultation with RPC Camp 1.
- ii) Daily EHS monitoring and reporting by the Site Supervisor. No weekly EHS monitoring and reporting by the LES due to contractual issues.

November 2019

- i) No GHD site visit.
- ii) Daily EHS monitoring and reporting by the Site Supervisor.
- iii) No weekly EHS monitoring and reporting by the LES due to contractual issues and a change in role.

December 2019

- i) No GHD site visit.
- ii) Daily EHS monitoring and reporting by the Site Supervisor.

- iii) No weekly EHS monitoring and reporting by the LES due to contractual issues and a change in role.

VII. APPROACH AND METHODOLOGY FOR MONITORING

14. Monitoring has been undertaken and compared against the objectives of safeguards set out in the SEMP which are to avoid and/or minimise environmental and social impacts from the site clearance and preparation activities.

15. To monitor compliance with the SEMP and the Contractor's performance, the following monitoring, auditing and reporting are ongoing throughout the site clearance works.

Table VII-1. Monitoring, auditing and reporting schedule for site preparation activities

Person responsible	Type of monitoring, audit, or progress reporting	How often?
Site Supervisor	Completes the daily site checklists to identify non-conformances. Document incidents, non-conformances and corrective actions in Incident Reports.	Daily
LES	Complete the weekly audit checklist. Coordinate remotely with the International Environmental Specialist (IES).	Weekly
IES	Complete the monthly audit and provide safeguards input into the monthly progress reports that are to be submitted to NUC and ADB.	Monthly

VIII. ENVIRONMENTAL AND SOCIAL MONITORING

8.1 EHS daily monitoring checklists

16. The Site Supervisor completes daily site checklists to identify non-conformances. Incidents and corrective actions have been further documented in Incident Reports and waste transfers have been logged in Waste Logs. Due to the initial requirement for capacity building around environmental management and safeguards, there was a delay in the Site Supervisor commencing the daily checklists in September. Daily checklists for all working days may not be completed due to no site works taking place as a result of weather, breakdown/maintenance of equipment and resourcing. A review of the daily checklists and working with the Site Supervisor on site has shown an improvement in overall EHS understanding, reporting and compliance. Refer to Appendix B for the daily site checklists, Incident Reports and Waste Logs for September to December.

8.2 EHS weekly auditing checklist

17. The LES completes weekly auditing checklists to identify non-conformances and provide feedback and recommendations to the Site Supervisor. Due to contractual issues being resolved, the LES was only able to complete two weekly checklists. A review of the weekly monitoring

checklists and through phone call conversations with the LES have shown an improvement in overall EHS compliance. Refer to Appendix C for the weekly monitoring checklists for September.

8.3 EHS monthly site audits

18. Due to the need for capacity building around environmental management and safeguards undertaken by the IES and contractual issues being resolved with the LES including a change in LES personnel, daily and weekly monitoring checklists have not been completed for the full duration of this reporting period (September to December). Despite this, there has been good progress on daily monitoring and reporting by the Site Supervisor. The IES has carried out monthly (September and October) EHS site audits to observe, monitor and provide recommendations and capacity building to the Site Supervisor and LES. Monthly site audits have shown an improvement in overall EHS compliance. Generally, there is a good level of compliance with the SEMP and associated sub-plans with minor non-conformances.

19. Capacity building at the Contractors workshop and onsite shadowing is an ongoing process. Where knowledge gaps exist around the identification and recording of EHS non-conformances and corrective actions, capacity building has been provided through classroom style learning and onsite shadowing. The Contractor has shown a keen willingness to learn and has been available when required. Refer to Appendix D for site photos showing typical conformances and non-conformances identified during the IES site visits (September and October).

8.4 EHS summary

20. **Table VIII-1** provides a summary of the key indicators being tracked during this site clearance and preparation works.

Table VIII-1. September to December 2019 EHS key indicators summary

EHS key indicators	Summary
Number of daily checklists completed	September: 9 October: 13 November: 12 December: 12
Number of weekly audit checklists completed	September: 2 October to December: None due to LES contractual issues and change in LES personnel
Number of monthly audits completed	2 (September and October) out of 4
Number of environmental incidents reported and type	10 Mainly around oils spills from equipment and the hydraulic hose, spill kit generally used
Number of health and safety incidents reported and type	0

EHS key indicators	Summary
Waste transferred off site	October: 18 Waste Logs complete November: 11 Waste Logs complete
Pre-vegetation clearance bird nest surveys	Areas requiring surveys: A1-1, A1-2, B1-1, B1-2, B1-3 Areas where surveys have been completed: A1-1, A1-2, B1-1, B1-2, B1-3
Number of grievances raised	1 Speed of trucks, and associated dust, past RPC Camp 1. Closed out in adherence with the Grievance Redress Mechanism and logged in the register.

8.5 Summary of key observations and non-conformances

21. Key observations of non-conformances noted by the IES during the two (September and October 2019) monthly audits were communicated to the Site Supervisor and the LES to follow up on. These are summarised below.

Hazardous materials – Evidence of minor oil spills from hydraulic hose, reoccurrences, use of spill kit on occasions visually observed. Oil spill quantity observed to not be large enough to fill out incident report. Chemicals and fuel are not kept on site.

Refuelling management - Refuelling of fuel occurs on site. The spill kit was observed to be available.

Noise – Noise from the excavator and driller were not observed to be continuous throughout the day and week due to the stop / start nature of works as a result of the weather, personnel breaks and equipment breaking down and requiring maintenance. Construction noise was not observed to be an issue. As confirmed prior to mobilisation, no blasting will be required.

Dust – Phosphate grains are not fine and dust throughout the days/week was not observed to be an issue from the stockpiles. Rain events act as a natural dust suppression on site. Contractor trucks were observed to be within the 20 km speed limit past RPC Camp 1. Within this speed limit, dust levels are very low.

Vegetation management – Organic matter observed to not be fully cleared from the site prior to rock breaking activities. Vegetation stockpiling and removal from site generally good.

Stockpile management – Stockpiles of large broken rock and phosphate are present on site. Stockpile management is generally good, however; some organic material was observed to be mixed up with the stockpiles.

Waste management – There is a designated waste management area within the site which shows a generally good level of separated waste. Organic waste is stockpiled in a separate area. Waste Logs reviewed during this period show that waste is being monitored, recorded and disposed of to waste facilities.

Pooling – Minor pools were observed on site, however due to the heat these dry up quickly after rainfall events. A drainage ditch is present along the site boundary between the site and road.

Site boundary – Areas of works has been clearly demarcated and works are within the site boundary.

Traffic and access – Minimal truck movements observed. No overloading observed, however trucks are not covered. Signage has been provided at the entry points to the site. The Contractor confirmed that more formal signage has been ordered for shipment. Observations showed that Contractor truck movements past RPC Camp 1 were within the 20 km/hr speed limit.

Worker health and safety - Generally, site workers have shown good compliance with PPE, including hard hats, high-visibility clothing and site boots. Site protection glasses are used occasionally. For people entering the site, site boots should be worn, on some occasions this was not the case. It was observed that workers brought their own water bottles to site. Prior to works commencing, it was evident that site workers did not have appropriate full PPE. GHD worked with the Contractor in July and August 2019 to obtain complete PPE for site personnel. The Contractor responded positively and upon the first IES audit in September 2019, this recommendation was met.

22. If a non-conformance is raised by the LES or IES, the Site Supervisor is cooperative and usually closes out the recommendation that day or week. However, due the challenges in team management, reoccurrences of minor non-conformances do occur. It should be noted that although non-conformances have been recorded through the monitoring checklists, the Contractor is making good progress around understanding the importance of identifying and recording non-conformances, communicating these back to the team, and implementing corrective actions. Overall, non-conformances observed have been relatively minor and the Contractor has shown a keen willingness to improve the EHS culture within the company.

8.6 Recommendations

23. A summary of the key recommendations provided to the Contractor are provided below.

Hazardous materials management – Shovel to be available with the spill kit and in the event of the spill, the top layer of contaminated soil should be removed and storage in a container onsite or at NRC workshop. Spill kit to be kept on site throughout the week and ongoing maintenance required. Reiterate the use of the spill kit to all site personnel (recommendations actioned).

Dust – Reiterate the requirement for all site trucks to stay within the 20 km/hr speed limit past RPC Camp 1 for community health and safety around the potential for accidents and dust (recommendation actioned).

Vegetation removal – Improvements to site clearance including full vegetation removal prior to rock excavation (recommendation ongoing).

Stockpile management – Improvements to removing organic material from stockpiles.

Waste management – Improvements to site clearance including full waste removal prior to rock excavation (recommendation ongoing). Improvement to waste management area including a general waste bin for plastics, cans, worker waste (recommendation ongoing).

Pooling - Backfilling of pools on site after rainfall events (recommendation ongoing).

Traffic and access – Ordering and installation of more formal signs at the two entry points to the project site to warn visitors that it is a construction site (recommendation actioned).

Worker health and safety – Reiterate the requirement for all site personnel to wear site boots. If required, look into providing appropriate, earmuffs, site glasses, and dust masks (recommendation actioned). Encouragement around capturing and recording health and safety incidents/accidents and implementing corrective actions (recommendation ongoing).

Toolbox talks - Bring up EHS issues more frequently in toolbox talks led by the Operations Manager (recommendation ongoing).

24. A recommendation for Canstruct is to bring the 20 km/hr speed limit sign forward to just before the MFAT solar project to ensure trucks from the port construction site slow down prior to reaching the project site and RPC Camp 1 (recommendation ongoing).

8.7 Bird nest surveys

25. A summary of the bird surveys prior to site clearance works and the pre-vegetation clearance bird nest surveys carried out between July and December 2019 are provided below. Refer to Appendix D for photos.

16 to 26 July IES and LES dust and dawn bird survey. Initial dusk and dawn bird surveys in preparation of the desktop bird assessment and pre-clearance surveys (24 July and 25 July) were carried out by the LES and IES. One inactive nest was observed on the western site boundary, likely Nauru Reed-warbler (*Acrocephalus rehsei*).

August LES pre-vegetation clearance survey. Survey undertaken for areas A1-1, A1-2 and B1-1 by the LES. No bird nests were observed.

September LES and IES pre-vegetation clearance survey. Survey undertaken for area B1-2 and visual check from a safe location for B1-3 by the IES and LES. No bird nests were observed.

October LES and IES pre-vegetation clearance survey. Survey undertaken for area B1-3 by the IES. No bird nests were observed.

8.8 Capacity building and training records

26. Capacity building around environmental management and safeguards for the Contractor has been provided through workshop style lessons and shadowing on site monitoring by the LES and IES, during the site inspections. No evidence has been provided around worker training records. The IES has encouraged the Contractor to record worker training (e.g. health and safety training) and inductions. It is recommended that all staff training is logged in a register. With regards to the lack of reporting around health and safety incidents and worker training, this may be due to the culture around reporting in general.

8.9 Stakeholder engagement and community consultation

27. Community consultation with RPC Camp 1 has been ongoing throughout the site clearance works to date and generally takes places every 1-2 months. A summary of the consultations that have taken place between July and December 2019 are provided in **Table VIII-2**. Refer to Appendix E for meeting minutes. Overall, the Contractors' level of communication and consultation with the community, notably RPC Camp 1, and relevant stakeholders, has been proactive and to a good level. It is recommended that engagement with RCP Camp 1 should be

extended through the full site clearance program every 1-2 months. In the next reporting period, NUC will hold a consultation meeting with landowners to keep them updated on the progress of the project.

Table VIII-2. Summary of consultations undertaken between July and December 2019

Date	Attendees	Key points
22/07/19	Face to face meeting– Ronphos; GHD; NRC; LES	<p>Pre-works consultation with Ronphos</p> <ul style="list-style-type: none"> • Discussion around the potential impacts of blasting rock on the site, Ronphos’ blasting procedure and best practice. • Post meeting note: blasting not required.
23/07/19	Face to face meeting – GHD; LES; NRC; Government of Nauru; Australian Border Force (ABF); Canstruct	<p>Pre-works consultation with RPC Camp 1</p> <ul style="list-style-type: none"> • Introduction to the project including program, construction methodology, and potential EHS issues. • Procedures and information around potential blasting activities were discussed to ensure any potential impacts on users of the RPC 1 are mitigated.
26/08/19	Face to face meeting – LES; NRC; Government of Nauru; Canstruct; ABF	<p>Pre-works consultation with RPC Camp 1</p> <ul style="list-style-type: none"> • Update provided on the project including program, construction methodology, and potential EHS issues. • Issue discussed around clearing C1-1 and potential impact on flow of vehicles as the nearby road is narrow.
12/09/19	Face to face meeting - Eigigu Solutions; GHD; LES; NRC	<p>Project progress consultation with RPC Camp 1</p> <ul style="list-style-type: none"> • Update provided on the project including program, construction methodology, and potential EHS issues. • It was noted that blasting is very unlikely to take place. • Eigigu Solutions raised a grievance around truck speed limit outside RPC Camp 1 and issues with dust and health and safety.
13/09/19	Email – GHD emailed DCIE on behalf of NRC and NUC	<p>Proposed conservation area consultation</p> <ul style="list-style-type: none"> • Email consultation with the DCIE outlining the risk around the proposed conservation area to the south of the site and inviting a face-face consultation meeting or site visit.

Date	Attendees	Key points
02/10/19	Face to face meeting - Eigigu Solutions; Government of Nauru; NRC; NUC; GHD; Construct,	Project progress consultation with RPC Camp 1 <ul style="list-style-type: none"> • Update provided on the project including program, construction methodology, and potential EHS issues. • Follow up of the grievance raised by Eigigu Solutions in the meeting on 12/09/19 and actions undertaken by the Contractor and IES. Recommendation for Canstruct to bring the 20 km/ph speed limit site before the site.

8.10 Grievance redress mechanism and register

28. Implementation and recording of the project Grievance Redress Mechanism is being monitored by the LES and IES. The notification of works informed the community of the proposed works and provided contact information for raising grievances. Grievances can be raised through various channels, mainly via the Contractors Operations Manager and the NUC Project Manager. To ensure grievances are captured in the register, these are also discussed (if any) in the weekly NUC progress meetings. A review of the register has shown that between September and December 2019, one grievance was raised by Eigigu Solutions, as detailed in **Table VIII-3**. This grievance was acknowledged and closed out in accordance with the Grievance Redress Mechanism.

Table VIII-3. September to December 2019 grievances recorded

Grievance raised	Resolution
09/09/2019 - Eigigu Solutions Grievance: Trucks going to fast past RPC Camp 1 and causing dust issues. Not sure if these are the trucks from the port of solar farm site clearance works.	The Contractor and GHD carried out face to face consultation with Eigigu Solutions on 12/09/19 to discuss the grievance. The Contractor Operations Manager spoke with the team on site about the issue. Visual monitoring undertaken by GHD that week showed that Contractor trucks were observed to meet the 20 km/phr speed limit. However, trucks from the port construction were observed to be speeding. GHD raised this issue with the port EHS Specialist. A follow up consultation with Eigigu Solutions on 02/10/19 was undertaken. No further complaints. A further action was to move the 20 km/ph sign forward before the MFAT solar project. Canstruct to action.

8.11 Land leases and payments

29. The Contractor has a system in which any rock taken off site is tallied and monitored for payment to the landowners. As of December 2019, most rock has been reused onsite for levelling in order to minimize rock export from site. It is recommended that the Contractor collates tally documents into monthly summaries (recommendation ongoing).

30. NUC also obtained the additional signatures to complete the leases, as identified in the Due Diligence Report.

IX. CONCLUSION

31. Implementation of the SEMP by the Contractor is progressing well. The SEMP does not require updating. Generally, non-conformances between September and December have been relatively minor and the Contractor has shown a keen willingness to monitor and report on a daily basis. It is evident that the Contractor is implementing EHS safeguards, however; there is scope for further improvement in areas such as worker health and safety incident reporting, worker training recording, debris/construction waste management, and use of spill kit during spills, in order to bring the implementation to a higher level. Recommendations provided in this report have been communicated to the Contractor.

32. During monthly site audits, the Contractor has shown enthusiasm to improve the EHS culture within the company and is open to learning through the capacity building sessions provided by the LES and IES. Consultations with RPC Camp 1 are ongoing and effective in communicating project progress and potential EHS issues. One grievance was logged in September 2019 and closed out in adherence with the Grievance Redress Mechanism. It is recommended that engagement with RCP Camp 1 should be extended through the full program every 1-2 months, with one consultation meeting held with landowners in each reporting period to keep them updated on the progress of the project. Items to focus on in the next reporting period shall be around closing out recommendations and actions identified in this report, continued capacity building for the Contractor, continued consultation with RPC Camp 1, and through collaboration with the Site Supervisor and LES, improve the daily and weekly checklists now that there is a good level of understanding around EHS issues.