

# Environmental and Social Monitoring Report

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Third Semiannual Report  
March 2021

## 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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# Semi-annual Environmental and Social Safeguards Monitoring Report

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Project No.: 49450-009

Status: Final  
Date: February 2021

## Nauru: Solar Power Development Project July to December 2020

Prepared by Nauru Utilities Corporation for the Asian Development Bank.

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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
CSS	–	Country safeguard systems
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
SMR	–	Safeguards Management Report
SPS	–	Safeguard Policy Statement 2009
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 is the third semi-annual environmental and social safeguards monitoring report (SMR) of the Solar Power Development Project financed by the Government of Nauru (the government) and the Asian Development Bank (ADB). The SMR covers the site clearance and preparation activities undertaken during the July to June 2020 period. The site clearance and preparation activities are being undertaken by the Nauru Rehabilitation Corporation (NRC), ahead of construction and installation works on behalf of Nauru Utilities Corporation (NUC) as the implementing agency.

2. This report is intended to follow-up NRC's implementation of environmental and social mitigation measures for the site clearance and preparation activities as stated in approved project documents and the Site-specific Environmental Management Plan (SEMP). The SEMP (August 2019) was prepared by NRC with the assistance of GHD as supervision consultant for the site clearance activities, ahead of the mobilisation of site clearance works towards the end of August 2019. The SEMP was reviewed and cleared by the ADB on 24 September 2019. As the SEMP is a live document which responds to issues noted on the site during works, the SEMP was updated in April 2020 in consultation with NRC to cover potential impacts associated with encountering phosphate during works. While His Excellency President Lionel Rouwen Aingimea of the Republic of Nauru declared a National Emergency on 16 March 2020 due to the novel coronavirus (COVID-19) which included strict quarantine and border protection efforts, this has only impacted the ability of the GHD International Environmental Specialist (IES) to travel to site for monthly audits and has in some instances delayed the receipt of parts for machinery. There has not been a change to the environmental and social impacts associated with the project therefore there has been no update of the SEMP and associated health and safety plan due to COVID-19.

3. This report presents a summary of the key activities, environmental and social safeguards implementation progress, monitoring results, implementation of roles and responsibilities, reporting, consultations, grievances raised and documented, and capacity building efforts, for the July to December 2020 period.

## II. PROJECT OVERVIEW

### 2.1 Background

4. The 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 detailed design phase. The panels, batteries and inverters will be imported and transported into Nauru by sea. **Figure II-1** shows the site location.

5. Due diligence assessments were undertaken during preparation of the project and instruments setting out the safeguards risks and impacts and how these were to be mitigated were approved by the government and ADB. The instruments were prepared in accordance with country safeguard systems (CSS) and Safeguard Policy Statement 2009 (SPS) and identify the

mitigation and monitoring requirements and processes. This SMR is the third report documenting the results of the monitoring of the activities and processes. The first SMR was prepared for the period July to December 2019 and the second for the period of January to June 2020.



**Figure II-1. Site location and layout**

## 2.2 Project Categorization and approval

6. The project was categorized as a Category “B” project as per ADB’s *Safeguard Policy Statement 2009*. The Initial Environmental Examination (IEE) (May 2017) for the project was conducted 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.

7. 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.

## 2.3 Compliance with national regulations and international standards

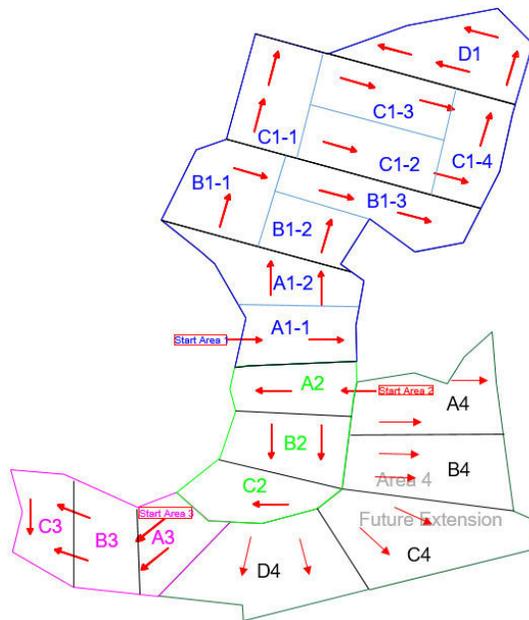
8. The project is governed by the applicable laws and regulations of Nauru and the Safeguards Policy Statement 2009 (SPS) of the ADB. The IEE (2017) states all relevant Nauruan environmental and other legislations applicable to the project. As of June 2020, no issues have been observed around conformance to national regulations or international standards.

## 2.4 Brief project description

9. Following the recommendations of the IEE and its environmental management plan (EMP) and land due diligence report, the scope of works for site clearance and preparation activities by NRC comprise the following key steps:

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

10. **Figure II-2** shows the originally planned work sequence and program for site clearance and preparation activities. Stage 1 of the project commences in Area 1 (blue) and ends in Area 3 (pink). The direction of rock cutting and backfill is also shown in **Figure II-2**. Area 1, from A1 working up to D1, was initially predicted to take up to 6.5 months, and be levelled to 25 metres above sea level (masl). This schedule was updated to take up to about 9 months in the previous SMR report. Area 2 (green), starting at A2 and completing in B2, was initially predicted to take 1.5 months, and be levelled to 33 masl. Area 3, A3 and B3 was predicted to take approximately 1 month to complete with a reduced level of 36 masl. The total estimated duration for clearing and levelling to complete Areas 1, 2 and 3 was initially anticipated to be 10 months and has now been reviewed to be approximately 12 months. Final finishing layers were planned to take place as one task over the whole site (stages 1, 2 and 3) to optimise resources and productivity. For future expansion, works for Area 4 (black) are estimated to be completed within 4 months.



**Figure II-2. Site clearance work progression**

## 2.5 Progress during this reporting period

11. Works in Area 1 were largely completed by August 2020. Areas 2 and 3 of the project commenced conjointly in early July with vegetation clearance, pinnacles breaking and levelling. As of the end of August 2020 all activities were completed in Area 1, 2 and 3. In mid-September 2020 a site walkover was undertaken by NRC and the GHD Local Environmental Specialist (LES) to confirm outstanding defects to be resolved. This defects list was formally agreed upon by NUC and NRC on 23 September 2020. A formal handover of Areas 1, 2 and 3 by the NRC Chairman to the NUC CEO was undertaken on 30 October and the final list of defects for Areas 1, 2 and 3 was signed off by NUC and NRC on the 2 December 2020.

12. In mid-October works for the future expansion area, Area 4 (black), commenced and are estimated to be completed within 4 months. The works in Area 4 include an additional one hectare which will be incorporated into the footprint of the Solar Power Development Project.

## III. KEY ACTIVITIES JULY TO DECEMBER 2020

13. **Scope of this SMR.** This report presents the status of the compliance of the project with required environmental and social safeguards for the period July to December 2020. This is the third SMR, the first of which was finalised and disclosed in January 2020 for the period of June to December 2019 and the second of which was disclosed in October 2020 for the period of January to June 2020 and finalised in February 2021. The scope of this report is to assess the compliance status on the environmental and social safeguards as per the loan agreement and covers the site clearance works which are in progress. The assessment of safeguards compliance covers the status of compliance and performance and the effectiveness of implementation of approved environmental and social safeguards instruments and as set out in the SEMP. Key activities

undertaken during the July to January 2020 period are summarised below. Detail and outcomes of these activities, where relevant, are provided in the subsequent sections of this report.

### **July 2020**

- No in country site visits were undertaken by the GHD International Environmental Specialist (IES) for the reporting period of July to December 2020 due to the global pandemic. Instead, regular status updates have been prepared on a fortnightly basis, based on the GHD IES's review of checklists, photos and site summary information from the LES and follow-up where required, and review of the Site Supervisor's daily checklists and other relevant documentation.
- Weekly site visits and audit checklists were completed by the LES. Additional site visits were also undertaken on a weekly basis by the LES to supplement site monitoring activities, given the inability to mobilise the IES.
- Daily monitoring and reporting was undertaken by the Site Supervisor.

### **August 2020**

- No in country site visits were undertaken by the IES due to the global pandemic.
- Daily EHS monitoring and reporting was undertaken by the Site Supervisor.
- Weekly EHS monitoring and reporting was undertaken by the LES. Additional site visits were also undertaken on a weekly basis by the LES to supplement site monitoring activities, given the inability to mobilise the IES.
- Daily EHS and weekly site visits and monitoring activities were reviewed on a fortnightly basis by the IES, to identify any issues with compliance and provide recommendations to mitigate these issues.

### **September 2020**

- No in country site visits were undertaken by the IES due to the global pandemic.
- No site works were undertaken during this period as works were complete on Area 1, Area 2 and Area 3 therefore no daily or weekly checklists were completed
- Site visits were undertaken on the 1, 4, 22 and 29 September by the LES to supplement site monitoring activities, given the inability to mobilise the IES. A site walkover was undertaken by the LES in conjunction with NRC on the 14 September to confirm outstanding defects and NUC and NRC formally confirmed agreement with the defects list on 23 September.

### **October 2020**

- No in country site visits were undertaken by the IES due to the global pandemic.
- Daily EHS monitoring and reporting was undertaken by the Site Supervisor.
- Weekly EHS monitoring and reporting was undertaken by the LES. Additional site visits were also undertaken on a weekly basis by the LES to supplement site monitoring activities, given the inability to mobilise the IES.

- Daily EHS and weekly site visits and monitoring activities were reviewed on a fortnightly basis by the IES, to identify any issues with compliance and provide recommendations to mitigate these issues.

#### **November 2020**

- No in country site visits were undertaken by the IES due to the global pandemic.
- Daily EHS monitoring and reporting was undertaken by the Site Supervisor.
- Weekly EHS monitoring and reporting was undertaken by the LES. Additional site visits were also undertaken on a weekly basis by the LES to supplement site monitoring activities, given the inability to mobilise the IES.
- Daily EHS and weekly site visits and monitoring activities were reviewed on a fortnightly basis by the IES, to identify any issues with compliance and provide recommendations to mitigate these issues.

#### **December 2020**

- No in country site visits were undertaken by the IES due to the global pandemic.
- Daily EHS monitoring and reporting was undertaken by the Site Supervisor.
- Weekly EHS monitoring and reporting was undertaken by the LES. Additional site visits were also undertaken on a weekly basis by the LES to supplement site monitoring activities, given the inability to mobilise the IES.
- Daily EHS and weekly site visits and monitoring activities were reviewed on a fortnightly basis by the IES, to identify any issues with compliance and provide recommendations to mitigate these issues.

## **IV. APPROACH AND METHODOLOGY FOR MONITORING**

14. Monitoring has been undertaken and compared against the objectives of safeguards set out in the IEE's EMP upon which the SEMP has been developed; these are to avoid and/or minimise environmental and social impacts from the site clearance and preparation activities. To monitor compliance with the SEMP and NRC's performance, the following monitoring, auditing and reporting are ongoing throughout the site clearance works.

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

<b>Person responsible</b>	<b>Type of monitoring, audit, or progress reporting</b>	<b>How often?</b>
Site Supervisor	Completes the daily site checklists to identify non-conformances. Document incidents, non-conformances and corrective actions in Incident Reports.	Daily
LES	Completes the weekly audit checklist. Coordinates remotely with the IES.	Weekly

<b>Person responsible</b>	<b>Type of monitoring, audit, or progress reporting</b>	<b>How often?</b>
LES	Completes additional weekly site visits and provide update and photos to IES	Minimum weekly
IES	Reviews daily and weekly checklists, site visit notes and weekly NUC/NRC meeting minutes and provides safeguards input into fortnightly status updates that are submitted to NUC and ADB.	Fortnightly

## **V. ENVIRONMENTAL AND SOCIAL MONITORING**

### **5.1 EHS daily monitoring checklists**

15. 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 Waste Logs. 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, for example no daily checklists were undertaken in September 2020. 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, and Waste Logs for July to December 2020 and to Appendix F for incident reports and supporting documentation.

### **5.2 EHS weekly auditing checklist and additional weekly visits**

16. The LES completes weekly auditing checklists to identify non-conformances and provide feedback and recommendations to the Site Supervisor. The LES also undertakes weekly site visits to confirm status of works and if any issues identified. A review of the weekly monitoring checklists and subsequent phone call conversations with the LES have shown an improvement in overall EHS compliance. Refer to Appendix C for the weekly monitoring checklists for July to December 2020. As a result of this process one major non-conformance was noted during a site visit in August 2020. Further information regarding this non-conformance is provided in section 5.6 and the Incident Report and associated documentation is provided in Appendix F.

### **5.3 EHS monthly site audits and fortnightly status updates**

17. The IES has undertaken review of daily and weekly checklists and site visit notes provided by the Site Supervisor and LES, to monitor compliance with the SEMP and provide recommendations and capacity building to the LES. These have been undertaken fortnightly and a status update of these reviews has been emailed to ADB, NUC and NRC. Fortnightly reviews 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.

18. Capacity building 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 onsite shadowing. Since the advent of the global pandemic this

capacity building has also been provided directly to the LES through phone calls and email correspondence, as an outcome of the fortnightly review process. The LES has then shared these learnings with NRC. NRC 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 LES site visits. Refer to Appendix E for a record of the fortnightly reviews emailed to ADB, NUC and NRC.

#### 5.4 EHS summary

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

**Table V-1. July to December 2020 EHS key indicators summary**

EHS key indicators	Summary
Number of daily checklists completed	July: 26 August 22 September 0 no work October: 24 November: 29 December: 19
Number of weekly audit checklists completed  Number of additional site visits completed by LES	June: 4 weekly checklists and 6 additional visits July: 4 weekly checklists and 4 additional visits August: 4 weekly checklists and 4 additional visits September: No weekly checklists but five site visits including a site walkover with NUC on 14 September October - 5 weekly checklists and 1 additional visit November 4 weekly checklists and 6 additional visits December 4 weekly checklists and 4 additional visits
Number of fortnightly reviews completed	10 fortnightly reviews and status updates provided (no work in September)
Number of environmental incidents reported and type	25 August (closed out 16 Oct) - Off site clearing (Discussed further in section 5.5. See Appendix F for new daily/weekly checklists, site log in, induction record and corrective action plan) 6 Oct – Oil spill 23 Nov – Oil spill
Number of health and safety incidents reported and type	0
Waste transferred off site	July: 2 Waste Logs complete October: 2 waste logs complete

EHS key indicators	Summary
Pre-vegetation clearance bird nest surveys	Areas requiring surveys: Area 2 (A2 and B2 and C2) and Area 3 (A3, B3 and C3)(all veg cleared by end of August) and Area 4 (all vegetation cleared by early November). Areas where surveys have been completed: Area 2, 3 and 4.
Number of grievances raised	0

### 5.5 Summary of key observations of improvement opportunities and non-conformances

20. Key observations of improvement opportunities or non-conformances noted by the IES during the fortnightly reviews were communicated to the Site Supervisor and the LES to follow up on.

21. Improvement opportunities were communicated via the fortnightly status updates issued by the IES to ADB and NUC as actions for the LES to follow up on during their weekly audits. The LES then confirmed these actions had been closed out and the status updates were updated accordingly to show these actions as closed out. Refer to Appendix E for evidence of the action status issued with fortnightly updates.

22. Incident report forms were prepared for any non-conformances noted by the Site Supervisor. These are provided in Appendix F and show how these non-conformances were closed out.

23. Key observations, improvements and non-conformances noted are summarised below.

- **Site boundary** – Areas of works have been clearly demarcated, and feedback was provided by the LES to the Site Supervisor to ensure survey marks can be easily observed by excavator operators. However, during the final stages of site clearance activities the LES identified during a site visit that excavation had occurred beyond the surveyed cadastral boundaries of land leased by NUC for the project. As a result of this incident a root cause analysis was conducted along with an assessment of safeguards impacts. The outcomes of this analysis are documented in a Corrective Action Plan which was prepared for the incident and is provided in Appendix F.

The root cause analysis findings found that the incident was a result of a number of contributing factors including i) a lack of site access restrictions, (ii) misunderstandings between NRC operators and a representative of the company to install the photovoltaic (PV) solar and battery plant, (iii) a lack of understanding of procedures by NRC operators to seek approval from NUC as implementing agency before changes to scope, and (iv) the keenness of NRC operators to complete the project in a timely manner.

A number of corrective actions were identified as a result of the incident, the majority of which have been implemented, including:

- Consultation with the impacted landowners and subsequent payments – **Evidence:** see attached Corrective Action Plan which includes evidence of

meetings held with landowners and presentations made to impacted landowners during consultation forums (Annex 4 – Annex 7). NUC made a one-off payment to each landowner impacted based on the government set annual lease fee. Payments to impacted landowners were disbursed prior to 31 December 2020.

- NRC now provides training to operations staff regarding the procedures concerning access to work sites and visitor registration. **Evidence:** Visitor logs are now used at the site (see example in Appendix F). In addition, all visitors or new staff to site are being inducted upon entry to the site (see example of induction record provided in Appendix F) To ensure staff and visitors are using the site sign in process, the daily and weekly checklists have been updated so that the Site Supervisor and LES can confirm this process is being implemented (see new daily and weekly checklists in Appendix F and completed checklists in Appendix B and Appendix C, respectively).
  - NRC is to develop procedures for the approval of changes in work scope at sites, and is to provide training to operations staff to ensure awareness of these procedures.
  - NRC has provided formal notice to the PV Contractor to confirm that access to the project site will be restricted unless permission is granted by NUC only. **Evidence:** See formal notice provided in Appendix F (Annex 8 of the Corrective Action Plan).
  - The main site access is blocked when no works are being undertaken to restrict access. **Evidence:** See photos in Appendix D.
- **Hazardous materials** – Evidence of minor oil spills from hydraulic hose, reoccurrences, use of spill kit on occasions visually observed as well as quick removal of spills where noted. Hose fitters are on hand promptly to ensure issues are resolved. Chemicals and fuel are generally not kept on site. Spill kit were available in the period until October and used majority of the time and refuelling. Incident reports completed and signed off. During the October site visit (following completion of works in Areas 1, 2 and 3) the LES noted that the spill kit had been removed from site. Additionally, no incident report forms were available for the month of November, when the LES noted spills on site. Through the fortnightly review process, it was confirmed that a new spill kit was provided (see photo in Appendix D) and the LES reminded the site supervisor and the NRC engineering manager of the need to clean up spills regularly and prepare Incident Reports and ensure this is communicated to all mechanics and operators.
  - **Refuelling management** - Refuelling of fuel occurs on site. The spill kit has been observed to be available. NRC are continuing to show continual improvement in how environmental matters are managed, as demonstrated by the photo in Appendix D showing refuelling occurring on utes (effectively within a bunded area).
  - **Noise** – Noise from the excavator and rock breaker was 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. Other construction noise was not observed to be an issue.

- **Dust** – NRC trucks are consistently observed to be within the 20 km speed limit past RPC Camp 1. Within this speed limit, dust levels are low. The island was in drought conditions for the majority of the reporting period and water was not available to support dust management. Dust was observed by the LES during this period both on site and directly adjacent. Therefore, through the fortnightly review process undertaken by the IES, the LES was requested to monitor compliance with the dust management plan in the SEMP including new safeguards regarding ensuring loads are covered and checking weather conditions on a daily basis with works to be discontinued in high wind conditions. The LES confirmed these requirements were communicated to the NRC Operations Manager and the LES has confirmed compliance with these requirements during the ongoing site visits. Consultation with RPC Camp 1 has indicated that dust has not been a concern for them.
- **Vegetation management** –Vegetation stockpile management and removal from site is generally good. Bird monitoring is ongoing, but no nests noted.
- **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, however only a small amount of waste logs has been provided by NRC as the majority of works had been completed in this reporting period (Appendix B).
- **Traffic management:** Trucks were observed to be maintaining speed, and no complaints have been received. The new speed sign (outcome of September 2019) was finally shipped to the island in late June and installed in early July near the entry to the project site (see photo in Appendix D). RPC Camp 1 have made a request for the road to be widened at the point where the road slope towards RPC1, due to safety reasons associated with the use of heavy vehicles. NRC confirmed this will be undertaken when works are complete.
- **Worker health and safety** - Generally, site workers have shown good compliance with PPE, including hard hats, high-visibility clothing and site boots. All staff have now been provided with dust masks and safety glasses and, as per revised SEMP operators are wearing these. While there is an improvement in the wearing of PPE some mechanics were still noted to not be using gloves (see photo in Appendix D).

24. If an opportunity for improvement or non-conformance is raised by the NES or IES, the Site Supervisor is cooperative and usually closes out the recommendation that day or week as reflected through the fortnightly status updates (Appendix E) or the incident report forms (Appendix F). 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, NRC is making good progress around understanding the importance of identifying and recording non-conformances, communicating these back to the team, and implementing corrective actions.

25. Overall, opportunities for improvement and non-conformances observed have been relatively minor, such as spill management and ensuring access restrictions are maintained, and NRC has shown a keen willingness to improve the EHS culture within the company.

## 5.6 Recommendations

26. Recommendations noted within the SMR for the period July to December 2020 were provided in a formal letter from NUC to NRC dated 10 February 2021.

27. A summary of the key recommendations provided to NRC via a formal letter from NUC dated 10 February 2021 are provided below.

- **Site boundary:** NRC is to develop procedures for the approval of changes in work scope at sites, and is to provide training to operations staff to ensure awareness of these procedures (recommendation outstanding) All site workers are to use the site sign in process and all new visitors to the site are to be inducted to the site, including knowledge of existing safeguards and procedures (recommendation ongoing).
- **Hazardous materials management** – The NRC site supervisor and project engineer to remind all operators and mechanics of the need to check equipment prior to work, have working spill kits available and clean up spills as soon as they occur, and prepare Environmental Incident Reports for any spills or other non-conformances (recommendation ongoing).
- **Dust** – Reiterated the importance of adhering to the dust management plan in the SEMP including implementation of new and existing safeguards requiring weather conditions to be checked before works, works to be discontinued in high wind conditions and all truck loads to be covered (recommendation ongoing).
- **Traffic and access** – Access through main gate to be restricted to ensure all staff and visitors go past site office and blocked when no one at the site (recommendation actioned). Road to be widened at the point where the road slope towards RPC1, due to safety reasons associated with the use of heavy vehicles.
- **Worker health and safety** – Reiterate the requirement for all site personnel to wear PPE through regular toolbox talks, ensuring all staff captured (including mechanics, particularly the need to wear gloves)

## 5.7 Bird nest surveys

28. 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 2020 are provided below.

### July LES pre-vegetation clearance survey

- Survey undertaken for areas A2, B2 and C2. No bird nests were observed.

### August LES pre-vegetation clearance survey

- All vegetation has been cleared in Area 2 and Area 3.

### September LES pre-vegetation clearance survey

- No vegetation on site and no works being undertaken.

### **October LES pre-vegetation clearance survey**

- Survey undertaken for area A4 by the LES. No bird nests were observed.

### **November LES pre-vegetation clearance survey**

- All vegetation has been cleared in the additional one-hectare area within Area 4.

### **December LES pre-vegetation clearance survey**

- All vegetation had been cleared on the project site.

## **5.8 Capacity building and training records**

29. Due to the global pandemic, capacity building is now provided remotely to the LES, through phone calls and email communication, and any outcomes are discussed directly with the LES and Site Supervisor.

30. With the exception of induction records (see Appendix F) no evidence has been provided around worker training records. The IES has encouraged NRC to record worker training (e.g., health and safety training) and inductions. It is recommended that all staff training is logged in a register. EHS documentation and a copy of the SEMP has been provided in the site office. Templates have been prepared and provided for NRC to record site inductions and health and safety incidents.

31. Given the incident in August 2020 further capacity building was provided through the LES and NUC to NRC regarding the need to induct all site workers and visitors to the site and to ensure all staff and visitors to the site signed into a visitor log in the site office (see Appendix F). Additionally, the daily and weekly checklists were revised by the IES to be easier to understand (yes, no answers) and include the need to ensure the site log in process was being followed. Capacity building was undertaken first for the LES, and then for NUC through the LES, to ensure the revised checklists were understood and adopted.

## **5.9 Stakeholder engagement and community consultation**

32. In late March, all Australian contractors at the RPC Camp left the country, therefore there are no regular occupants of the camp. After March 2020 no formal consultation has been undertaken with RPC, however no complaints have been received.

## **5.10 Grievance redress mechanism and register**

33. 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 NRC 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. No grievances were raised during the period of July to December 2020.

## **5.11 Land leases and payments**

34. NRC has a system in which any rock taken off site is tallied and monitored for payment to the landowners.

35. For the period July to December 2020, NUC issued land lease payments totalling \$415,536.78 to 745 landowners. For undisbursed lease payments, NUC has established a bank account, held, and managed by the Department of Treasury, which acts as an interest-earning special account. Undisbursed lease payments totalling \$32,795.69 for the July to December 2020 period have been deposited into this account following attempts by NUC to obtain the missing bank account details of 107 landowners.

## **VI. CONCLUSION**

36. Implementation of the SEMP by NRC is progressing well. Compliance with these new and revised safeguards has been noted during monitoring by the LES. Generally, non-conformances between July and December 2020 have been relatively minor, with the exception of the excavation beyond the site boundary in August 2020. Corrective actions associated with this incident have largely been implemented and NRC has shown a keen willingness to monitor and report daily and take feedback where provided. It is evident that NRC is implementing EHS safeguards, however; there is scope for further improvement in areas such as worker health and safety including wearing of PPE and reporting of incidents, use of spill kits and checking of equipment for leaks, dust management and/or mitigation, site access and procedures and worker training recording in order to bring the implementation to a higher level. Recommendations provided in this report have been communicated to NRC through a formal letter issued by NUC on 10 February 2021.

37. During site inspections undertaken by the LES, the NRC 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, through the LES. There has been no formal consultation with the RPC Camp 1 since the start of the global pandemic. However, given the limited use of the RPC Camp 1 currently this is not considered an issue. Any issues related to noise, dust and traffic speed are being appropriately monitored and controlled through site inspections undertaken by the LES. When travel restrictions are lifted, and the RPC Camp 1 is again fully operational it is recommended that engagement with RCP Camp 1 should recommence on a regular basis.

38. 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 NRC through collaboration with the Site Supervisor and LES and ensuring any lessons learnt from this phase of the project are shared with the PV Contractor via capacity building for NUC.