Environmental and Social Monitoring Report

Semiannual Report
November 2021

Kiribati: South Tarawa Water Supply Project

Prepared by the Ministry of Infrastructure and Sustainable Energy for the Asian Development Bank and World Bank.

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ADB Grant No. 0652/065

Status: Final

Date: September 2021

Government of Kiribati

Ministry of Infrastructure and Sustainable Energy

South Tarawa Water Supply Project

Semi-Annual Safeguards Monitoring Report

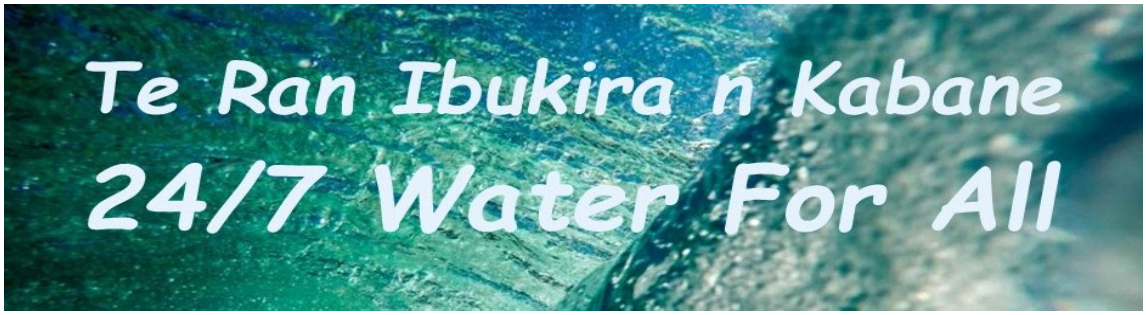
January – June 2021

Prepared by STWSP Project Management Unit, MISE

With Assistance From:

FCG

PUBLIC UTILITIES BOARD



GREEN CLIMATE FUND

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ASIAN DEVELOPMENT BANK

WORLD BANK GROUP

Report Details

Report Title	South Tarawa Water Supply Project – Semi-Annual Safeguards Report S1 2021
Project No.	
Status	Final
File Location	
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Abbreviations

ADB	Asian Development Bank
AP	Affected People
CCP	Communication and Consultation Plan
CESMP	Construction Environmental and Social Management Plan
CSS	Country Safeguards System
EA	Executing Agency
ECD	Environment and Conservation Division (within MELAD)
EIA	Environmental Impact Assessment report (as per the CSS)
EHSG	Environmental Health and Safety Guidelines (of the World Bank Group)
EL	Environmental License
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
GOK	Government of Kiribati
GRM	Grievance Redress Mechanism
IA	Implementing Agency
IEE	Initial Environmental Examination
MELAD	Ministry of Environment, Lands and Agricultural Development
MFED	Ministry of Economic and Finance Development
MISE	Ministry of Infrastructure and Sustainable Energy
NO	No-objection
O&M	Operation and maintenance
OP	Operational policy
PEO	Principal Environment Officer (of ECD)
PIAC	Project Implementation Assistance consultant
PMU	Project Management Unit
RF	Resettlement Framework
RO	Reverse Osmosis
RP	Resettlement Plan
SEMP	Stakeholder Engagement and Management Plan
SMR	Semi-annual safeguards monitoring report
SPS	Safeguard Policy Statement
STWSP	South Tarawa Water Supply Project
WASH	Water Sanitation and Hygiene
WB	World Bank

EXECUTIVE SUMMARY

1. **The project**. The South Tarawa Water Supply Project (STWSP) is being implemented by the Government of Kiribati (GOK) with support from the Asian Development Bank (ADB) and World Bank (WB). The sub-components of the STWSP include i) establishment of two desalination plants in Betio and McKenzie, ii) establishment of solar photovoltaic (PV) system in Bonriki, iii) water network improvements all over South Tarawa, and iv) water and sanitation hygiene (WASH) awareness raising. The executing agency of the project is Ministry of Economic and Finance Development (MFED) and the implementing agency is the Ministry of Infrastructure and Sustainable Energy (MISE).

2. **Purpose of the report**. This is the first Semiannual Safeguards Monitoring Report (SMR) of the South Tarawa Water Supply Project (STWSP). The report combines both environmental and social safeguards. This first report provides a structure for the future safeguards monitoring, including table templates for reporting progress, performance of environmental and social management plan (ESMP) implementation, health and safety and environmental effects, as well as involuntary resettlement performance and compliance with relevant covenants. Progress in public consultation, information disclosure, capacity building and setting up grievance redress mechanism (GRM) is also monitored.

3. **Safeguards categorization**. STWSP safeguards are based on the principles of ADB and WB; ADB's Safeguard Policy Statement (SPS) 2009 and WB's Environmental and Social Framework 2016. The project has been classified under ADB as Category B for environment and involuntary resettlement and Category C for indigenous persons. Under the WB policies, the project is classified as Category B for both environmental and social risks. Both WB and ADB safeguard specialists will review and provide no objection to safeguards documents prepared by MISE prior to submission for review and clearance by Environment and Conservation Division (ECD) and issue of the environmental license, and Land Division for clearance of the resettlement plan (RP).

4. **Environment.** Both ADB and WB require environmental assessment commensurate with the risks and impacts for environmental category B projects, the assessments prepared have been updated and reformatted so as to also meet the requirements of the Kiribati country safeguards system (CSS) which is an environmental impact assessment (EIA) for this type of infrastructure project. Three separate environmental and social impact assessments (ESIA) – for each component of the project and contract package - have been prepared to fulfil the government requirements as well as ADB and WB requirements. Each ESIA includes an environmental and social management plan (ESMP). Both ADB and WB has approved the reports. The ECD approval has been obtained for two components; (i) water network; and (ii) solar PV. The ESIA for the third component--desalination plants--is in process and will be approved after inclusion of additional marine ecology data. The next step is the national public disclosure process.

5. **Resettlement**. For social safeguards, a draft Resettlement Plan (RP) was prepared during earlier phases and is currently being split into three subcomponent specific RPs that will include detailed inventory of losses (mainly trees) and calculations for necessary compensations, which are currently being updated.

6. The safeguards work during the period was mainly related to updating the remaining documents and arranging further surveys for marine baseline data in McKenzie as well as updated tree counting in Bonriki. There have been no construction activities.

7. **Activities during the period**. During the reporting period the work of the project management unit (PMU) supported by the project implementation assistance consultant (PIAC) has been affected by COVID-19 restrictions allowing only home office-based work by the international consultants. The national consultants of PIAC were mobilized on 6 April 2021 and have been able to work in the field. A Safeguards Manager has been recruited to the PMU and will start her work in the project in July 2021.

8. During the next reporting period, July-December 2021, the pending MELAD ECD approval (for the solar and desalination ESIAs) will be obtained and three subcomponent specific Resettlement Plans completed. The bidding processes for all the infrastructure components will be commenced and the safeguards documentation will form part of the bidding documentation.

I. PROJECT DESCRIPTION

1 Project Overview

9. The main objective of STWSP is to provide the entire population of South Tarawa with access to a reliable, safe and climate resilient water supply. These services will be delivered by the Public Utilities Board on a 24-hours, 7-days per week basis to all households and non-domestic customers via metered connections.

10. The project will combat factors that result in the high incidence of waterborne disease, through the delivery and effective management of new and rehabilitated climate-resilient water supply assets and improved hygiene practices.

11. The project will establish a capacity to produced 6,000 kl/day of desalinated water supplementing the 1,400 kl/day of water already produced at the Bonriki Water Treatment Plant. 3,500 kl/day of desalinated water will be produced at Betio and 2,500 kl/day of desalinated water will be produced at McKenzie. The required power generation to offset by a new solar photovoltaic (PV) array (2.5 MW) will be installed on the Bonriki water reserve. New and rehabilitated water supply network infrastructure will reduce leakage and provide a pressurized and safe drinking water 24/7 to each household. In addition, the project includes a 5-year climate change, water, sanitation and hygiene (WASH) awareness program with strong involvement of local civil society organizations.

12. STWSP has a total budget of US$69.42 million and is co-financed by the Green Climate Fund), the Asian Development Bank (ADB), the World Bank and Government of Kiribati (GOK). The Ministry of Finance an Economic Development (MFED) is the executing agency and Ministry of Infrastructure and Sustainable Energy (MISE) is the implementing agency, MISE has established a project management unit (PMU) to deliver the project. The PMU is supported by project implementation assistance consultant (PIAC) which includes safeguards specialists to work alongside and support the safeguards officers assigned to the PMU.

13. **Safeguards categorization**. The project has been classified under ADB as **Category B for environment and involuntary resettlement** and **Category C for indigenous people**. Under the WB policies, the project is classified as Category B for both environmental and social risk. As part of the co-financing agreements, WB and ADB agreed that both environmental and social (E&S) policies apply to the project, but that instruments will follow the ADB terminology. Both WB and ADB E&S specialists will review and provide no-objection (NO) to safeguards documents prepared by MISE.

14. **Project Implementation Timetable**. The project components and milestones are addressed in the Project Implementation Timetable shown in Table 1 below.

Table 1 Project Implementation Timetable

Ref	Contract	Component	Start	Finish
GDW-1	Two Desalination Plants and Two Bore Fields	Design and Construction	1-Mar-22	30-Nov-23
		Operations and Maintenance	1-Feb-23	30-Jun-27
GDW-2	Water Supply Networks and Associated Works	Design and Construction	12-Jun-22	18-Jan-26
		Operations and Maintenance	9-Feb-23	30-Jun-27
	WASH Part A	Water is Life	9-Feb-23	30-Jun-27
GDW-3	Solar PV and Associated Works	Design and Construction	1-Sep-21	30-Aug-22
CSF-3	WASH Part B	Community Partnership	24-Apr-21	23-Apr-26

CSI-6	WASH Awareness Program – Part C "Walk the Talk"	Walk the Talk	1-Jan-23	31-Jan-23

15. COVID-19 travel restrictions have had a significant impact on the project timing. All project procurement documents (consultants and contractors) now include the requirement for COVID-19 Safety Plans while national project staff are required to follow COVID-19 safety practices. The Project is closely following the Government of Kiribati's COVID-19 requirements including imposed restrictions on travel and quarantining as well as the ADB's requirements for its staff and consultants and the limitations imposed by countries from which international consultants are drawn. Provisional sums have been included in project budgets to allow for COVID-19 cost impacts.

2. Safeguard Legal Requirements

National Safeguards Regulations

16. The following is a list of Regulations currently in force in Kiribati that deals with environmental and social issues that could apply to infrastructure projects like STWSP.

(i) Environment Act 2007 and Environment (General) Regulations 2017

(ii) Kiribati Occupational Health and Safety Act 2015

(iii) Land Planning Ordinance 1972 (amended 1973, 1974, 1977, 1979, 1980 (2), 2000), the objective of which is to apply controls over land use and developments within designated areas;

(iv) Public Utilities Ordinance of 1977 which vests responsibility for the protection and security of water resources in the Public Utilities Board, and includes regulations for the protection of water reserves,

(v) Public Health Regulations 1926 which provide for public health measures including sanitation, solid waste collection and drainage,

(vi) Foreshore and Land Reclamation Ordinance of 1969, which regulates extraction of material such as sand, gravel, reef mud and rock,

(vii) Local Government Act, 1984 which empowers local government bodies to issue bylaws relating to environmental protection

(viii) Penal codes (Cap 76 1977) having some offences in the Code that are relevant to environmental protection and enforcement.

(ix) Kiribati Biosecurity Act (2011)

(x) Kiribati Building Act (2006)

Safeguard Policies of Financing Institutions involved in the Project

17. The project is being co-financed by the ADB and WB and therefore in addition to the country safeguard system (CSS), the safeguard requirements of the Asian Development Bank (ADB) and the World Bank (WB) will also be complied with.

18. Through its Safeguard Policy Statement 2009 (SPS) ADB establishes policy objectives, scope and triggers, and principles for three key safeguard areas of environment, involuntary resettlement, and Indigenous People. The SPS sets out the process to be applied from screening, through due diligence and assessment to monitoring and reporting. The WB has operational policies relating to environmental and social safeguards. OP 4.01. Like ADB SPS, OP4.01 sets out the process to be applied and commences with environmental screening which is undertaken to determine the appropriate extent and type of environmental assessment

Administrative Framework for Safeguards Implementation

19. Requirements of the country safeguard system (CSS) are set out in the Environment Act of 2007 and Environment (General) Regulations, 2017. The act assigns primary responsibility for undertaking environmental assessment of projects to the project developer. The Ministry of Environment, Lands and Agricultural Development (MELAD), under the direction of the Principal Environment Officer (PEO), is responsible for review and approval of environmental assessment reports, prescription of requirements for publication and disclosure environmental assessment reports, issuance of environment licenses, and prescription of any conditions to the licenses.

20. Environment licenses are required from the MELAD for all activities that are deemed environmentally significant. The Act requires the applicant for the environment license (in this case the MISE) to submit an application with an application fee to the PEO. On consideration of the application, the PEO determines whether to issue an environment license or require an Environment Impact Assessment (EIA) or refuse the application.

21. When an EIA report is required, the applicant undertakes the assessment according to the required format and is required to hold public consultations. This is compatible with the development partners' requirements, which requires that consultation is meaningful, commences early in the project preparation cycle, provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people, is inclusive of the views of women, men, and vulnerable groups, and is carried out in a non-coercive manner.

22. Once the EIA report is received by MELAD, the PEO will determine the appropriate form of its publication and disclosure to interested parties, and the deadline for receipt of comments. Comments received must be shown to the applicant and taken into consideration. Concurrently the report is also reviewed by the Environment and Conservation Division (ECD), where regional and international expert views may be sorted. In accordance with ADB policy, revisions should be made in response to comments.

23. On receipt of comments, the PEO decides whether to grant a license and if a license is to be granted, whether it will include any conditions. Conditions may include duration, location, prescribed methods, emission limits, monitoring and reporting requirements, lodgement of bonds and payment of fees, and preparation of plans and specific mitigations.

24. A 30-day public exhibition phase ends the process, culminating in a public consultation meeting to receive and respond to comments.

25. The ECD is responsible to monitor the activity's progress to ensure compliance with the license conditions.

II. PROJECT SAFEGUARDS PROGRESS

26. This is the first Semiannual Safeguards Monitoring Report of the implementation phase of STWSP (ADB Grant No. 0652/065) in Kiribati combining both environmental and social safeguards for the first half of 2021. No monitoring activities as such have yet been performed, but some safeguards related survey work and updating of documents have taken place.

27. The safeguards staff of the project includes an international Safeguards Coordinator/Environmental Specialist, International Social Safeguards Specialist and national community engagement team of the PIA consultancy team (same experts as in previous PDA team). PMU (MISE) will engage a national Safeguards Manager from July 2021 onwards. Due to national and international travel restrictions due to the COVID-19 pandemic the international staff has not been able to travel to Kiribati during PIA phase so far.

1. Environmental Safeguards

28. ADB requires initial environmental examinations (IEE) for environmental category B projects, but the Kiribati government regulations under the Environment Act 2007 require application for environmental license (EL) and a full environmental impact assessment (EIA) for this kind of infrastructure projects. Three separate environmental and social impact assessments (ESIA) – for each subcomponent of the project - have been prepared during PDA phase to fulfil the government requirements as well as ADB and WB requirements.

29. The ESIA reports include environmental and social management plans (ESMP), including Environment Health and Safety Guidelines (EHSG) specifications for construction contractors. The requirements for mitigation measures will be described in the updated ESIA/ESMP and will be also required in the contractor's environmental management plans (CEMP).

30. During the previous phase (PDA), MISE PMU submitted the 3 Environmental License Applications (ELA) together with 3 draft/final draft ESIA documents to MELAD ECD for review in August/September 2020. Due to an unexpected change in MELAD ECD's staff email contact details which were not communicated to the MISE PMU, a delay in receipt and processing of the EL applications and requested reviews of ESIA documents occurred.

31. MELAD/ECD approval process (Kiribati government approval) is ongoing – MELAD/ECD approval has been obtained to two of the reports (Network and Solar PV ESIAs); the third one is in process. In order to get the ESIA for desalination plants (Desal-ESIA) finalized, the MELAD/ECD has requested MISE to organize a marine baseline survey in McKenzie and to get the ESIA updated with that data.

32. Following the approval of MELAD ECD, MISE PMU is about to commence a 30-day public exhibition phase for Solar and Network ESIAs, culminating in a public consultation meeting to receive and respond to comments. All public comments will need to be addressed in the final ESIA submission and additional requirements included under the terms of MELAD ECD's Environmental License where relevant. For the Solar PV ESIA, the public hearing process will be arranged together with the STREP project. It is also planned to conduct joint public exhibition for the Network and Desalination ESIAs in the next reporting period.

33. The summary of environmental safeguards activities in the reporting period are presented in Table 2 below:

Table 2 Summary of Environmental Safeguards Activities January-June 2021

January	Meeting between MISE PMU and MELAD ECD staff 24.1.2021. Resubmission of draft/final drafts of ESIA to MELAD ECD: Solar-ESIA 22.1.2021, Networks-ESIA 28.1.2021, Desal-ESIA 28.1.2021.
February	Feedback from MELAD ECD on Network-ESIA and Desal ESIA on 17.2.2021.
March	Feedback from MELAD ECD on Solar-ESIA on 4.3.2021. Addressing comments and resubmission of updated final draft ESIAs: Solar-ESIA 19.3.2021, Networks-ESIA 16.3.2021, and Desal-ESIA 17.3.2021.
April	PIA team mobilization. Addressing comments of MELAD/ECD on the Desal-ESIA. Network-ESIA approved 16.04.21
May	Agreement to commence a marine baseline survey in order to finalize the Desal-ESIA.
June	Planning of marine baseline survey to be carried out by MFMRD staff with supervision of PMU and PIA consultants. Contracting MFMRD for the work (to be carried out in July-August). Solar-ESIA approved 01.06.21 Preparations for public exhibition of Solar-ESIA in collaboration with STREP

2. Social Safeguards

34. The social safeguards are based on the policies of ADB and WB; principles of these policies are been followed to ensure that both long-term lease agreements and temporary use of land will avoid involuntary resettlement impacts. Any projects that involve land acquisition and resettlement impacts are to be prepared under the Resettlement Plan (RP).

35. The Project will have limited land acquisition and resettlement impacts, as most of the project components have already been designed to avoid/minimize land acquisition and resettlement with no cases of displacement of people. However, there are temporary inconveniences such as increased vehicle movements during construction phase. All of the social impacts of this project with proposed mitigations has been addressed in the ESIAs and RP prepared.

36. During PDA, a draft RP and a Due Diligence Report (DDR) covering the McKenzie Desalination Plant site were completed. In September 2020, it was agreed between MISE PMU and ADB and World Bank safeguards specialists that is not possible to finalize the Resettlement Plan (RP) for STWSP until detailed designs by Contractors are completed and that the main RP will need to be split into 3 separate RP's (one for each main subproject) to mitigate the risk of a delay on one subproject impacting the delivery of the other subprojects. The preparation of the 3 separate RP's has been started by PIA consultants. Recounting tree/plant loss in Bonriki is also ongoing.

37. During the reporting period, due diligence continued as part of the land acquisition process for the three components of the Project. This includes the detailed inventory of losses of the land in Bonriki for the Solar PV plant as well as for the water tank sites for the distribution network and outfalls for the desalination plants.

38. The summary of social safeguards activities during the reporting period are summarized in Table 3**Error! Reference source not found.** below.

Table 3 Summary of Social Safeguard Activities January-June 2021

Jan-Mar	No specific social safeguard activities during the period
April	PIA National Safeguards Team formal engagement and inception.
May	Preparation of three separate RPs for Desalination plants, Reticulation network and Solar PV Array started (splitting the previous RP into three and updating the data where necessary).
June	Engagement and coordination with Land Management Division of MELAD to complete survey of the Solar PV array site in Bonriki and facilitate conduction of detailed inventory of losses and to be included in the Solar PV Array RP.

MISE PMU will coordinate final update of the RP's including measurement, valuation, and payment of compensation to Affected Persons (APs) following completion of detailed designs by the respective Contractors.

3 Safeguard Implementation Arrangements

39. According to the grant agreement, the EA (MFED) will implement the Environmental and Social Safeguards documents (ESIAs, ESMPs and RPs) through the IA (MISE) supported by the PMU. The PMU with assistance of the PIA consultant will supervise and evaluate the implementation of CESMPs. The ECD is responsible to monitor the activity's progress to ensure compliance with the license conditions.

40. The PMU/MISE will implement the RPs with the supervision of MELAD and with the assistance of the PIA consultant, and ensure that compensation payments for any land/asset acquisition that is needed in line with the approved resettlement plan take place as per ADB policy requirements, and compensation payments are made before any assets or land is impacted or acquired for construction works. The PMU's Safeguards Manager will also identify unanticipated impacts during implementation and preparing necessary safeguards documents, including updating of RP and/or preparing corrective action plan if there are non-compliance in accordance with ADB Safeguard Policy Statement (SPS).

41. The summary of implementation arrangements for safeguards are shown in Table 4 below

Table 4 Safeguards Implementation Roles

Organization	Environment and Social Safeguard Implementation Roles
EA (MFED)	▪ Ensure compliance with safeguard Related Agreement Covenants ▪ Ensure that compilation and presentation of SMR under the project are met
MISE – PMU	▪ Work closely with PUB and MELAD on public disclosure of safeguard documents and consultations with Affected Peoples. ▪ Update and Submission of Safeguard Documents as required ▪ Implement the Stakeholder Engagement and Management Plan ▪ Supervise, Monitor and Report on the Contractor's implementation of the ESIAs, EL conditions, RPs and GRM and other obligations ▪ Conduct investigations in the GRM, maintaining the Register and supporting of the GRC ▪ Undertake Safeguard Monitoring Audits and Surveys ▪ Inputs to the Project Quarterly reports and submission of SMR reports ▪ Submit Compliance Documents, Safeguard Budgets to MFED and ADB
MELAD	▪ Monitor and enforce EL Conditions as required under the Environment Act and Regulations ▪ Undertake Land Surveys and payment of tree compensations ▪ Monitor grievances and complaints on the project and refer them to PMU ▪ Participate in Public Consultations
Public Utilities Board (PUB)	▪ Participate in the project safeguard monitoring activities for effective transfer of safeguard mechanisms upon completion of project ▪ Make provisions in its annual budget for payment of compensation
ADB-WB-GCF	▪ Review safeguard documents and monitoring reports ▪ Undertake regular review missions ▪ Disclose safeguard documents as required ▪ Safeguard Budget Approval – MISE department warrants

III. ENVIRONMENTAL PERFORMANCE MONITORING

1 Status of ESMP Implementation (Mitigation Measures)

42. The ESMP/CESMP implementation has not yet been initiated because the project is in detailed design phase and the construction has not yet been started. The updated ESMPs/CESMPs are going to be finalized in late 2021 – early 2022 (different subprojects have different schedules).

43. Reporting on 'Compliance with ESMP Requirements' as well as 'Issues for further action' will start during pre-construction phase using the following table templates.

Table 5 Compliance with ESMP Requirements (Environmental Performance) - template

ESMP Requirements	Compliance Status (Yes, No, Partial)	Comment or Reasons for Non-Compliance	Issues for Further Action

Table 6 Issues for Further Action - template

Issue	Required Action	Responsibility and Timing	Resolution
Old Issues from Previous Reports			
New Issues from This Report			

2. Health and Safety

44. Reporting on 'Health and Safety Issues' will start after construction starts (2022) using the following table template.

Table 7 Health and Safety Issues - template

Issue	Required Action	Responsibility and Timing	Resolution
Old Issues from Previous Reports			
New Issues from This Report			

3. Environment Effect Monitoring

45. **Monitoring plan.** The environmental monitoring will be reported using the following table after the construction phase starts (2022).

Table 8 Environment Effect Monitoring Results in the Reporting Period - template

Location	Parameter	Date	Monitoring value	Relevant government standard, standard value

46. **Monitoring activities in the reporting period.** The environment effect monitoring activities and results will start once the construction gets started.

47. **Assessment.** This chapter is not yet relevant. The monitoring results and their comparison with baseline conditions will be reported in the following semiannual report.

IV. INVOLUNTARY RESETTLEMENT PERFORMANCE MONITORING

48. Compliance monitoring on resettlement will start later. The following table templates will be used for monitoring.

Table 9 Summary of Compliance with RP Requirements

RP Requirements	Compliance status Yes/No/Partial	Comment or Reasons for Compliance, Partial Compliance/Non-Compliance	Issues for Further Action

Table 10 Issues for Further Action - Template

Issue	Required Action	Responsibility and Timing	Resolution
Old Issues from Previous Reports			
New Issues from This Report			

V. PUBLIC CONSULTATION, INFORMATION DISCLOSURE, CAPACITY BUILDING AND GRIEVANCE REDRESS MECHANISM (GRM)

49. Open consultations have taken place throughout the preparatory phases. Meetings began by project members disclosing the latest available information on the project, including descriptions of the project, potential impacts, and to seek feedback relating to the project and any concerns. A summary of issues raised in the consultations is presented in the Annex 2.

50. A STWSP webpage was also created on MISE official website during PDA phase where project description, outputs, newsletters, safeguard documents, contact details, etc were disclosed to the public. The webpage will be updated progressively by the PMU throughout the project duration. Electronic versions of final project documents such as RPs, GRM, ESIAs etc will also be disclosed on this webpage.

51. Since PDA phase, PMU continues to submit Quarterly Reports to government stakeholders, financing institutions and all other relevant stakeholders. The first Quarterly report for this implementation phase covering April – June 2021 will be distributed in the next reporting period.

52. GRM (See Annex 3) has been designed during the PDA and is presented in the ESIAs and RPs. The tools to support the implementation of the GRM are also included in Annex 4

and Annex 5. There has been grievances reported up to date. For the next reporting period, the PMU will update the GRM document by setting up a public consultation and communication system, GRM contact details, nominating GRM officers and organizing the Grievance Redress Committee (GRC) to ensure that public is provided with full information on the risks and impacts of the project and understand the way to submit their grievances including the project's transparent process of addressing their concerns.

53. The Project's Stakeholder Engagement and Management Plan (SEMP) created during the PDA is being updated and will be finalized during next reporting period. SEMP will guide the process (means, methods, frequency, documentation etc.) for all communications about the project. Examples of activities during this reporting period that are in the plan are obtaining MELAD guidance during the network ESIA environmental license process and distributing the quarterly report

54. Project information will be disclosed to stakeholders as per the project's Stakeholder Engagement and Management Plan. Disclosure will follow the requirements of the ADB Public Communications Policy 2011, the World Bank safeguard and communication requirements, and any laws of the Government. This will include uploading of the environmental assessment and other safeguard due diligence documents on the ADB and WB websites and making these documents available for local disclosure. Draft and final version safeguards documents will be disclosed locally (including summaries in I-Kiribati) and by the ADB and WB on their websites.

VI. COMPLIANCE WITH SAFEGUARDS RELATED COVENANTS

55. Only a few of the activities with obligations stated in the loan agreement and requiring compliance monitoring were initiated during the reporting period. Table 11 below shows that all safeguard related covenants will be complied with or not yet due.

Table 11 Compliance with Project Grant/Loan Agreements (ADB, WB)

Schedule	Para No.	Covenant	Remarks/Issues (Status of Compliance)
ADB Grant Agreement (Nov 2020)			
4	5	Environment The Recipient shall ensure that the preparation, design, construction, implementation, operation and decommissioning of the Project and all Project facilities comply with (a) all applicable laws and regulations of the Recipient relating to environment, health, and safety; (b) the Environmental Safeguards; and (c) all measures and requirements set forth in the ESIA, the EMP, and any corrective or preventative actions set forth in a Safeguards Monitoring Report.	To be complied. ESIAs (including ESMPs) have been prepared in accordance to relevant Kiribati legislation, as well as ADB's SPS. ESMPs will be updated once detailed designs are available.
4	6	Land Acquisition and Involuntary Resettlement The Recipient shall ensure that all land and all rights-of-way required for the Project are made available to the Works contractor in accordance with the schedule agreed under the related Works contract and all land acquisition and resettlement activities are implemented in compliance with (a) all applicable laws and regulations of the Recipient relating to land acquisition and involuntary resettlement; (b) the Involuntary Resettlement Safeguards;and (c) all measures and requirements set forth in the RF and the RP, and any corrective or preventative actions set forth in the Safeguards Monitoring Report.	To be complied Splitting of RP into 3 separate RPs, one for reach main subproject was commenced, this include preparation for detailed inventory of losses (ILO) in the site for the Solar PV Array.
4	7	Without limiting the application of the Involuntary Resettlement Safeguards, the RF or the RP, the Recipient shall ensure that no physical or economic displacement takes place in connection with the Project until: (a) compensation and other entitlements have been provided to affected people in accordance with the RF and the final RP; and (b) a comprehensive income and livelihood restoration program, if required, has been established in accordance with the RF and the final RP.	To be complied Based on the latest design a process to conduct detailed ILO at the Solar PV Array to enable calculation of compensation entitlements has been commenced. The ILO will include plants and trees next to the site boundary as these may need to be cleared for construction purposes. Compensation process for losses of plants and trees at tank locations has commenced.
4	11	Human and Financial Resources to Implement Safeguards Requirements: The Recipient shall make available necessary budgetary and human resources to fully implement the EMP, the RF and the RP.	To be complied Engagement of the PIA consultant has been completed. The consultant has commenced activities and engaged international and national

Schedule	Para No.	Covenant	Remarks/Issues (Status of Compliance)
			safeguards implementation team. PMU is in a process of engaging a Safeguards Manager from July 2021 onwards.
antia4	12	<u>Safeguards - Related Provisions in Bidding Documents and Works Contracts</u> The Recipient shall ensure that all bidding documents and contracts for Workscontain provisions that require contractors to: (a) comply with the measures relevant to the contractor set forth in the ESIA, the EMP, the RF and the final RP (to the extent they concern impacts on affected people during construction), and any corrective or preventative actions set forth in a Safeguards Monitoring Report; (b) make available a budget for all such environmental and social measures; (c) provide the Recipient with a written notice of any unanticipated environmental, resettlement or impacts that arise during construction, implementation or operation of the Project that were not considered in the ESIA, the EMP, the RF and the final RP; (d) adequately record the condition of roads, agricultural land and other infrastructure prior to starting to transport materials and construction; and (e) reinstate pathways, other local infrastructure, and agricultural land to at least their pre-project condition upon the completion of construction	To be complied During the reporting period (first half of 2021) the finalization of the bidding documents have taken place. ESIAs/ESMPs and RPs will be part of the bidding documentation
4	13	<u>Safeguards Monitoring and Reporting</u> The Recipient shall do the following: (a) submit semi-annual Safeguards Monitoring Reports to ADB and disclose relevant information from such reports to affected persons promptly upon submission; (b) if any unanticipated environmental and/or social risks and impacts arise during construction, implementation or operation of the Project that were not considered in the ESIA, the EMP, the RF or the RP, promptly inform ADB of the occurrence of such risks or impacts, with detailed description of the event and proposed corrective action plan; and (c) report any actual or potential breach of compliance with the measures and requirements set forth in the EMP, the RF or the RP promptly afterbecoming aware of the breach.	To be Complied This is the 1st Semi-annual safeguards monitoring report submitted to ADB. Construction work has not yet been commenced.
Amendment to ADB Grant Agreement (Apr 2021)			
		Subject to paragraph 6B below, the Recipient shall not award any Works contract involving involuntary resettlement impacts until the Recipient has prepared and submitted to ADB the final RP for such Works contract	To be complied Preparation of RPs for individual subprojects has commenced. Draft RP for Desalination plants is expected to be completed

Schedule	Para No.	Covenant	Remarks/Issues (Status of Compliance)
		based on the Project's detailed design, and obtained ADB's clearance of such RP. The Recipient may award a Works contract involving involuntary resettlement impacts prior to the final RP having been submitted to and cleared by ADB if the contract: (a) is of a "design and build" or "turnkey" type under which the design must be completed for the Works contract before the RP is finalized: and (b) expressly provides that the installation and construction phase (and commencement thereof) is conditional upon: (i) a final RP for the Works contract based on the Works contract's detailed design having been submitted to, and cleared by ADB; and (ii) the Recipient having notified ADB and the contractor in writing through the RP completion report that due consultation has been carried out, all required physical and/or economic displacement has been completed , compensation and other entitlements have been provided to affected people in accordance with the RP.	prior to the Works contract award. RPs for the Network and Solar PV Array will be part of a design and build Works contract, hence the RP will not be finalized before the Works contracts are awarded. The principle for the construction of the Solar PV Array and Networks is to avoid any additional losses. However, for cases where this may not be possible, the RPs will prescribe a process aligned with ADB and WB safeguards and National policies to ensure consultation takes place and compensation is made. Updated draft RPs will be issued to ADB during the next reporting period.
WB Grant Agreement			
Section I C	1	The Recipient shall ensure that the Project is carried out with due regard to appropriate health, safety, social, and environmental practices and standards, and in accordance with the Safeguard Instruments.	To be complied ESIAs, ESMPs and RPs have been prepared to guide the safeguards work.
	2	The Recipient shall: (a) take all necessary actions to avoid, where feasible, or minimize the Involuntary Resettlement of Affected Persons in the carrying out of the Project or any part thereof; (b) where Involuntary Resettlement is unavoidable, before initiating the implementation of any Project activities which would result in such Involuntary Resettlement, make available to the Affected Persons compensation and, as applicable, relocate and rehabilitate the Affected Persons in accordance with the RPF and in a manner satisfactory to the Association; and (c) whenever required pursuant to the RPF, proceed to have RAPs: (i) prepared in form and substance satisfactory to the Association; (ii) exceptas otherwise agreed with the Association, submitted to the Association forreview and no-objection; (iii) consulted upon, adopted and publicly disclosed, in a manner satisfactory to the Association; and (iv) thereafter, implemented in accordance with their terms	To be complied Generic RP was prepared during PDA. Preparation of RPs for individual subprojects has commenced.

Schedule	Para No.	Covenant	Remarks/Issues (Status of Compliance)
		and in a manner satisfactory to the Association.	
	3	Except as the Association shall otherwise agree in writing, the Recipient shall ensure that none of the provisions of the Safeguard Instruments be abrogated, amended, repealed, suspended or waived. In case of any inconsistencies between the provisions of any of the Safeguard Instruments and the provisions of this Agreement, the provisions of this Agreement shall prevail.	Not yet due No inconsistencies reported
	4	The Recipient shall ensure that: (a) all consultancies related to technical assistance, design and capacity building under the Project, the application of whose results could have environmental, social and health and safety implications, shall only beundertaken pursuant to terms of reference reviewed and found satisfactory by the Association; and (b) such terms of reference shall require the technical assistance, design and capacity building activities take into account the requirements of the applicable Safeguard Policies and EHS Guidelines.	To be complied Engagement of the PIA consultant has been completed. The consultant has commenced activities and engaged international environmental and social safeguards specialists and national community engagement team. The Terms of Reference for the PIA Consultants (FCG) include assistance to the Project Management Unit (PMU) with safeguards, gender and participation plan as well as assistance to undertake due diligence for proposed additional financing. PMU is in a process of engaging a Safeguards Manager.
	5	Without limitation upon its other reporting obligations under this Agreement, the Recipient shall: (a) take all measures necessary on its parts to regularly collect, compile and submit to the Association, as part of the Project Reports, and promptly in a separate report whenever the Association may require, information on the status of compliance with the Safeguard Instruments, all such reports in form and substance acceptable to the Association, setting out, *inter alia*: the status of implementation of the Safeguard Instruments; (ii) conditions, if any, which interfere or threaten to interfere with the implementation of the Safeguard Instruments; and (iii) remedial measures taken or required to be taken to address such conditions; (b) promptly furnish to the Association a copy of each quarterly progress report prepared and submitted by any entity (including any engineer) supervising the Project's civil works, the Project's contractors and/or subcontractors; and (c) promptly upon receipt, furnish to the Association any notification received from any entity (including any engineer) supervising the Project's civil works, the Project's contractors and/or subcontractors	To be complied This is the 1st Semi-annual safeguards monitoring report submitted to ADB. Construction work has not yet been commenced.

Schedule	Para No.	Covenant	Remarks/Issues (Status of Compliance)
		regarding any incident that have might occurred during Project implementation.	
	6	The Recipient shall maintain, throughout Project implementation, and publicize the availability of a grievance redress mechanism, in form and substance satisfactory to the Association, to hear and determine fairly and in good faith all complaints raised in relation to the Project and take all measures necessary to implement the determinations made by such mechanism in a manner satisfactory to the Association.	To be complied The GRM process is described in the ESIAs and RPs. Upon award of Works contracts, GRM officers will be announced to the community

VII. CONCLUSIONS, RECOMMENDATIONS, PRIORITY ISSUES AND ACTIONS

56. The project implementation phase started in April 2021 and this report covers only the few first months. No safeguards monitoring as such has taken place as the project in a stage of starting the bidding processes. The pre-construction and construction phases will follow later. The ESIAs and RPs will be part of the bidding documentation.

57. **Environment.** The next steps in the environmental safeguards is to carry out the national public disclosure process for solar ESIA. In order to finalize the process for desal ESIA, the marine baseline survey will need to be completed and its data integrated to the desal ESIA. The marine survey work is ongoing and will be finalized in July-August 2021.

58. **Resettlement.** The priority activity on social safeguards is to finalize the three separate RPs and update the compensation budgets by early August 2021.

59. The new PMU Safeguards Manager will be mobilized in July 2021 and her briefing will take place in July itself.

60. As a summary, the major safeguards activities during the next reporting period will be:

i. Carrying out Marine Baseline Survey by a team of Ministry of Fisheries and Marine Resources Development of Kiribati (MFMRD) – this is needed in order to obtain MELAD approval for desalination ESIA

ii. Finalizing the environmental license/approval processed for solar ESIA and desalination ESIA

iii. Identifying future requirements (CEMP development by contractor, review and clearance of CEMP, monitoring and reporting of CEMP compliance etc)

iv. Finalizing boundary setting and tree counting survey in Bonriki by a team of MELAD/LMD – this is needed for the finalization of the solar RP

v. Finalizing three separate RPs and updating compensation budgets

vi. Finalizing SEMP

vii. Finalizing GRM

viii. Planning of first environmental and social capacity building and training activities.

ANNEX 1. OUTLINE OF SAFEGUARDS MONITORING REPORTS

Suggested Outline of Semi-annual Safeguards Monitoring Report (Source PAM)

Heading/Section	Contents
Introduction	Brief background on the project and subproject; Institutional arrangements for project management and environmental management;
Monitoring Activities	Who participated in the monitoring; Methodology for monitoring (whether checklists prepared etc.); When the monitoring was undertaken and what period it covers; Summary of other monitoring undertaken in the period (i.e. from contractor's monthly reports and if any survey/sample monitoring undertaken); Main activities – observations/inspections, consultations, interviews with contractor staff etc.
Works in Progress	Details of the works being undertaken, (with photographs); Include whether any environmental training/awareness has been provided to contractor staff in the period (what, by whom etc.)
Monitoring Results and Actions Required	Whether works and measures comply with the approved EMP/CEMP; Should follow sequence of items identified in EMP/CEMP and verify that all mitigations measures noted are being implemented; Corrective actions cited (date to be resolved and person responsible on contractor team and verification by IA/HRMG)
Summary and Conclusions	Summary of main findings; Main issues identified and corrective actions noted; Can include summary table which can be updated each period to track completion of actions required
Annexes	Monitoring checklist (based on items identified in the EMP/CEMP) refer annex 1 Additional photographs Additional information as required

Suggested Contents of Resettlement Monitoring Report

Heading/Section	Contents
Introduction	Brief background on the project/subproject and progress status The project's category and planning documents (original, updated or new plans) on resettlement impacts Institutional arrangements and budget allocation for resettlement/social management; Arrangement for the monitoring
Monitoring Activities	Methodology for monitoring (whether checklists prepared etc.); What period the monitoring covers Main activities – site visits, consultations, survey etc.

Monitoring Results and Actions Required	Progress and performance in implementation of RPs and other programs (how they were implemented, what are the outputs, etc.) Results on consultations, disclosure and grievance redress (whether they have been effective, level of satisfaction of APs with various aspects of the RP, public awareness of the compensation policy and entitlements will be assessed among APs.) Whether the implementation comply with the approved RPs (e.g. whether compensation rates were at replacement cost, full payment made to all APs sufficiently before land acquisition; prompt attention to unforeseen damages or losses, to ensure APs are fully compensated for losses) Results on outcome (whether APs were able to restore livelihoods and productive activities) Compliance on monitoring and disclosure (whether reports have been submitted, posted on website) Whether any issues and corrective measures identified to achieve the RP objective. If yes, actions with target dates and responsible agency/person) Follow-up item/plan for next report
Summary and Conclusions	Summary of main findings; Main issues identified and corrective actions noted; A table on follow-up action which can be updated each period to track completion of actions required including progress of the follow-up of problems and issues identified in the previous report
Annexes	Monitoring checklist (based on items identified in the RPs) Photographs Additional information as required

ANNEX 2. ISSUES RAISED IN PDF PHASE COMMUNITY CONSULTATIONS

Summary of issues raised in pdf phase community consultations (2018-2019)

Issues raised	Proposed mitigation	Control or safeguard measures	Responsible for implementation of mitigation
Land access for installation of infrastructure (water tanks) and encroaching	Detailed design has been completed showing only six sites on private land (Ambo, Antemai, Banraeaba, Bangantebure, Tebunia and Temaiku) will require additional water tanks. Location and alignment of the tanks has been discussed and agreed with landowners to minimize the impacts and accommodate to their needs and plans. Further three sites that under long Government leases (Nawerewere Hospital, Bonriki and Buota) will also require additional tanks.	The Resettlement Plan provides a detail description of the additional land requirements, landowners and required compensation and formulation of lease agreements.	Government with support from Supervising Engineer.
Land access for construction purposes	Access to private land will be required for laying down pipes. Community Liaison Officers engaged by the construction contractor will engage with landowners to provide information, record and understand concerns and feedback those concerns to the Contractor.	The Resettlement Plan and the ESMP provide guidelines to minimize impacts on local communities and households. The need to avoid the removal of or damage to trees during excavation, and replanting as required, is included in the ESMP.	Contractor building, commissioning and operating the water supply network and supervising engineer.
Poor state of the existing water supply network	This will be addressed by the proposed infrastructure improvements.	The PMU will oversee with support from the supervising engineer the construction and upgrade of the reticulation network.	Contractor building, commissioning and operating the water supply network and supervising engineer.
Degradation of water quality at the water reserves	The Government has committed to put in place the necessary measures to prevent new settlers coming into the reserves and managing the activities that could contaminate the ground water.	A monitoring regime that tracks water quality at the water reserve will be put in place. (but not within the scope of this project)	PUB
Excavation of trenches for pipelines and drilling boreholes impacting ground stability	The effect of feed water extraction on ground stability and freshwater lens is negligible	The ESMP includes the implementation of monitoring regimes.	Contractor building, commissioning and operating the water supply network, MELAD and supervising engineer.
Increased salinity of the water lenses, particularly at Bonriki, due to	Salinity level of wells in Bonriki and other areas is anticipated to improve as water extraction will remain unchanged overtime.	Not within the scope of this project.	PUB

Issues raised	Proposed mitigation	Control or safeguard measures	Responsible for implementation of mitigation
over extraction of fresh water and how this can be exacerbated by the Project.	A monitoring regime that tracks changes on the salinity level will be put in place.		
Destruction of the new tar-sealed road for pipe trenching	Water main travels parallel to the new tar-sealed road. Trenching will be required at specific places where the network connects to the mains or the tanks will be required. The Contractor shall locate and utilise the existing ducts installed under the roadway wherever possible. The Contractor will be required to repair the road and subsequently to re-repair as required.	The supervising engineer will ensure the road is fixed to the same construction standards to which was built.	Contractor (network) and supervising engineer.

ANNEX 3. STWSP GRIEVANCE REDRESS MECHANISM (GRM)

The STWSP under the PDA has established a grievance redress mechanism (GRM) for any matters related to project design, construction and operation. From a safeguard's perspective, members of the public may perceive risks to themselves or their property or have concerns about the environmental performance of the project. These issues may relate to construction and operation and therefore they will have rights to file complaints for the contractor, PUB and the MISE to address promptly and sensitively, and for complaints to be made without retribution.

The GRM process established is not only compliant with safeguards requirements from donors, but also with national legislation. The implementation of social safeguards following ADB and WB policies calls for the implementation of best practices, one of them being the need for an internal feedback and grievance redress mechanism to be effectively available. The GRM process was prepared by FCG during the PDA and in close consultation with the STWSP Community Engagement Team and the STWSP' PMU. A separate document has been prepared (and attached to RP) describing and guiding the GRM. During PDA, the MISE Public Relations officer was nominated as the GRM Officer in charge of receiving and facilitating the grievances. The new PMU Safeguards Manager will be the contact point from July 2021 onwards. At the time of completion of this report no grievances had been lodged.

The GRM shall be positioned within the PMU as this is the organization mandated with the power to coordinate all project related activities, structures and systems.

During construction, the contractor will appoint one staff member as a GRM officer for each worksite to receive complaints and initiate corrective action as appropriate. This name will be made available to the Supervising Engineer. Further, the name and contact details of the contact person for each site will be presented on a notice board at work sites and at the MISE. The notice board will also state (i) that members of the public with a grievance or concern have the right to register complaints (verbally or in written form) and for appropriate and reasonable action to be taken to address any valid complaint and (ii) that complaints can be made to the individuals concerned either verbally, in person, or in written form and that (iii) a written response will be provided within 48 hours.

The contractor will maintain a complaints book on site, containing grievance lodgment forms that are filled out in duplicate, with one copy provided to the complainant. The forms will be also available for claimants to fill on their own and submit anonymously into the GRM inbox[1]. The forms will record date, time and nature of the complaint and information on the rights of the complainant and process to be followed for assessing and acting on the complaint. The forms will allow space for anonymous complaints to be registered. Registering and resolving a complaint will be at no cost to the complainant. To facilitate the process and have a better understanding of the complaint, the form prompts the complainant to identify a solution to the grievance.

The contractor will then address the complaint and take corrective action agreed to with the complainant. For minor complaints, such as noise or dust nuisance, or disregard of safety procedures, immediate corrective action will be taken. For more serious issues requiring guidance or further discussions, the contractor will raise the issue with the Supervising Engineer. A written response will be prepared, stating either (i) the nature and duration of action that has been taken, (ii) where an issue is not readily addressed by direct action on site, the steps that have been taken for resolution or (iii) complaint is considered invalid, an explanation as to why. In each case, the complainant will be informed as to their rights for the next step. The response will be handed to the complainant or made available for them to collect, within 48 hours of the complaint being received. The steps in the grievance resolution process are shown below.

[1] The GRM inbox is a secure letter box type located at multiple locations including MISE, PMU office and work-site offices.

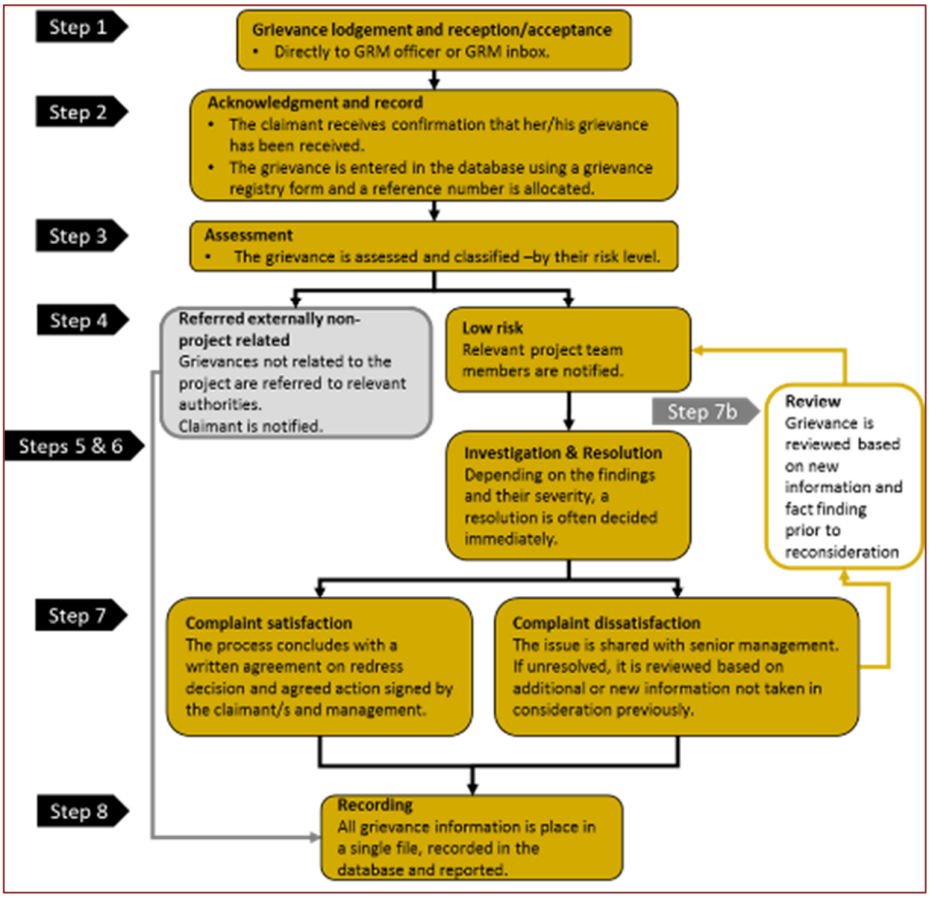

Figure - Steps in the Grievance Resolution Process

Should the complainant remain dissatisfied with the action taken or the explanation received, the matter/complaint file will be forwarded to the Supervising Engineer (see step 7 above). The Supervising Engineer will have assigned a member of staff with the role of GRM Officer who may be the same community liaison officer. The name of this individual will be provided on the complaints registration form, with contact details and notice that this individual can be approached for follow up in respect of the complaint and that this may be done in person, by phone or in written form. The Supervising Engineer will consult with MISE and on their behalf review the complaint and the response of the contractor, then make a decision to be referred to the complainant within a maximum of two weeks. If the complainant remains dissatisfied with the Supervising Engineer's decision, the grievance may be filed with the Magistrate's

ANNEX 4. GRIEVANCE REDRESS REGISTERING AND MONITORING FORM

MINISTRY OF INFRASTRUCTURE AND SUSTAINABLE ENERGY

SOUTH TARAWA WATER SUPPLY PROJECT

P.O. Box 498, Bairiki, Tarawa, Kiribati. Phone: (686) 75126192 75126142, Email: registry@mise.gov.ki Website: www.mise.gov.ki

STWSP Grievance Redress Registering and Monitoring Form

Assigned Number:…… Date:…… Time:……

A: Complainant Information (Personal Information)

1 **Full Name** *(or Anonymous)*: ……

2 **Address** *(village/location/W3W)*:……

3 **ID Number:** ……

4 **Gender:** ☐ **Male** ☐ **Female**

5 **Age:** ……

6 **Telephone:** ……

7 **Email:** ……

8 **Type of Complainant** (tick appropriate box):

☐ Affected Person(s)

☐ Intermediary *(on behald of the AP)*

☐ Government organisation

☐ Civil organisation (e.g. community, council, etc)

☐ Others (specify) ……

B: Complaint Details

10 **Mode of receiving grievance**

☐ Letter

☐ Telephone

☐ Email

☐ Verbal

☐ Suggestion box

☐ Others (specify):……

11 **Location of problem/issue specified in complaint:**

Village:

Community:

Land plot number:

GPS/W3W coordinates:

Others (specify):

12 **Type of problem/grievance:**

☐ Compensation

☐ Construction

☐ Land ownership

☐ Employment

☐ Project's coverage

☐ Others (specify)

1

13 Brief description of problem:

(If more space is require, continue at the back of the last page)

14 Brief description of factors causing the problem:

(If more space is require, continue at the back of the last page)

15 Person/agency responsible for causing the problem:

- ☐ Project implementing agency
- ☐ Civil organisations
- ☐ Affected parties
- ☐ Contractor
- ☐ Public Utilities Board
- ☐ Funding agency
- ☐ Urban Council
- ☐ Others (specify)

16 Past actions taken by the complainant (if any):

17 Details of the officer who received the complaint:

Name of Officer: …….

Position: …….

Name of office/ministry: …….

Date of lodging: …….

18 Proposed resolution by the complainant

(If more space is require, continue at the back of the last page)

2

18 Actions taken by receiving office/ministry

Action 1	Action 2	Action 3	Action 4
Short description	Short description	Short description	Short description
Name of Action Officer	Name of Action Officer	Name of Action Officer	Name of Action Officer
Office	Office	Office	Office
Date	Date	Date	Date

19 Final Resolution

Name of person completing the form: ……

Signature: ……

Date: ……

Name of the person entering the information of the form into the GRM database:……

Signature:……

Date:……

ANNEX 5. GRIEVANCE REDRESS MECHANISM REGISTRY

MINISTRY OF INFRASTRUCTURE AND SUSTAINABLE ENERGY

SOUTH TARAWA WATER SUPPLY PROJECT

Grievance Redress Mechanism Registry

	Assigned Number	Complaint information			Mode of receiving complaint	Person Entering the grievance	Person Receiving the grievance	Type of problem/ complaint	Brief description of problem	Brief description of factors causing the problem	Person/agency responsible for causing the problem	Past actions taken by the complainant (if any):	Officer who received the complaint	Proposed resolution by the complainant	Details of Investigation	Actions taken by receiving officer/ minstry				Grievance closed
		Time received	Date received	Person lodging												Action 1	Action 2	Action 3	Action 4	
Instructions		2	3		1	4	5	6	7	8	9	10	11	12	13	14				
Example	01/2021	11:30:00 AM	10/09/2020	Affected Person(s)	Suggestion box	Name Surname	Name Surname	Construction			Public Utilities Board		Safeguards Officer							No - under investigation

GRM Registry | Instructions