

Environmental Assessment and Review Framework

TONGA: Cyclone Ian Recovery Project

Prepared by the Ministry of Infrastructure, Kingdom of Tonga, an Implementing Agency for the Asian Development Bank (ADB)

This Environmental Assessment and Review Framework is a document of the Kingdom of Tonga. The views expressed herein do not necessarily represent those of ADB's Board of Directors, Management, or staff, and may be preliminary in nature.

TABLE OF CONTENTS

ABBREVIATIONS

I.	INTRODUCTION	1
	A. Project Background	1
	B. Purpose of EARF	1
II.	OVERVIEW OF PROJECT COMPONENTS	2
	A. Output 1: Reconstruction and climate- and disaster-proofing of the electricity network	2
	B. Output 2: Reconstruction and climate- and disaster-proofing of school facilities	2
	C. Output 3: Removal of asbestos from damaged buildings	3
III.	TONGA'S ENVIRONMENTAL ASSESSMENT AND REVIEW PROCEDURES	3
	A. EIA Review Procedures	3
	B. Local Capacity for Environmental Assessment	4
IV.	ANTICIPATED ENVIRONMENTAL IMPACTS	4
V.	ENVIRONMENTAL ASSESSMENT FOR PROJECT COMPONENTS	7
	A. Environmental Criteria for Core Component	7
	B. Specific Procedures for Environmental Assessment	7
VI.	INSTITUTIONAL ARRANGEMENTS AND RESPONSIBILITIES	9
	A. Implementation Arrangements	9
	B. Implementation Responsibilities	11
	C. Staffing Requirements and Budget for EARF Implementation	13
VII.	PUBLIC CONSULTATION AND INFORMATION DISCLOSURE	14
VIII.	GRIEVANCE REDRESS MECHANISM	15
	A. General Principles	15
	B. Grievance Coordination	16
	C. Grievance Procedures	16
IX.	MONITORING ENVIRONMENTAL PERFORMANCE AND REPORTING	17

ANNEXES

1. Classification of Major Projects in Tonga
2. TOR for Environmental Specialist
3. Documentation of Public Consultation Activities

ABBREVIATIONS

ADB	Asian Development Bank
APs	Affected Persons
CCDRA	Climate Change and Disaster Risk Adviser
DECC	Department of Environment and Climate Change
DRR	Disaster Risk Reduction
DRM	Disaster Risk Management
EAC	Environmental Assessment Committee
EARF	Environmental Assessment Review Framework
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EMS	Environmental Management Specialist
ESU	Environment and Social Unit
GFP	Grievance Focal Point
GoT	Government of Tonga
GRM	Grievance Redress Mechanism
IEE	Initial Environment Examination
MLECCNR	Ministry of Lands, Environment, Climate Change and Natural Resources
MFNP	Ministry of Finance and National Planning
MOI	Ministry of Infrastructure
MET	Ministry of Education and Training
NGO	Nongovernment Organization
PIU	Project Implementation Unit
PMU	Program Management Unit
REA	Rapid Environmental Assessment
SPS	ADB Safeguard Policy Statement (2009)
TOR	Terms of Reference

I. INTRODUCTION

A. Project Background

1. The Tonga Cyclone Ian Recovery Project (the project) is to support the Government of Tonga reconstruct and climate proof the main electricity grid network and school buildings and facilities on the Ha'apai Island Group, which were damaged by Tropical Cyclone Ian. On 11 January 2014, Tropical Cyclone Ian, a Category 5 system and the most powerful ever recorded in Tongan history, passed directly over the northeast islands of Ha'apai causing substantial damage. An estimated 5,000 people were directly affected and an estimated 800 homes were destroyed or heavily damaged. The Prime Minister declared a state of emergency for the Ha'apai on the same day. The preliminary estimates of damage and losses amount to \$55.3 million, equivalent to 12.1% of gross domestic product.

2. The 'Tropical Cyclone Ian Response Plan'¹, which was prepared by the government with the assistance of development partners, serves as the government's post-disaster needs assessment. The response plan identified immediate requirements and priority recovery and reconstruction needs. The 'build back better' principle is included in the assessment of these needs in order to ensure improved climate resilience.

3. The Government of Tonga, through the Ministry for Finance and National Planning (MFNP), requested ADB support for post-cyclone reconstruction on 7 February 2014, to reconstruct the Ha'apai electricity grid network and other key government infrastructure such as school and related facilities. The proposed project will (i) reconstruct and climate proof the electricity grid on Ha'apai; and (ii) reconstruct and climate proof damaged school buildings and facilities.

4. The project will use the implementation arrangements that are being set up by two ADB projects in Tonga, namely the Outer Island Renewable Energy Project (OIREP, under G0347/0348) for the reconstruction of electricity grids, and the Climate Resilience Sector Project (CRSP, under G0378) for the reconstruction of school buildings and facilities.

5. This is the environmental assessment and review framework (EARF). The provision for the use of frameworks is required for components of projects where decisions on scope and location and/or detailed design of components take place after ADB Board approval. The immediate disaster response nature of this particular project requires further due diligence to be fulfilled during the early stages of implementation. This EARF has been prepared to provide consistent and appropriate environmental standards to be considered under the project. Prior to approval of any components by ADB, an environmental assessment process as outlined in this EARF will be undertaken.

6. The government's environmental requirements as outlined in the Environmental Impact Assessment Act, 2003 and the Environmental Impact Assessment Regulations, 2010 have also been taken into account during the development of this EARF.

B. Purpose of EARF

7. The purpose of this EARF is to provide a framework to review and assess environmental aspects of activities undertaken within a project, including preconstruction, construction and

¹ Government of Tonga, 'Tropical Cyclone Ian Response Plan'

operational phases. It will provide an overview of the anticipated impacts of the project's components, and set out the requirements and procedures to ensure compliance with the national environmental assessment and review procedures in Tonga, as well as those required by ADB. Consultation mechanisms, grievance redress, and environmental monitoring and reporting will also be addressed within this framework to ensure ongoing adherence to environmental safeguards.

II. OVERVIEW OF PROJECT COMPONENTS

8. The project will support the government's efforts to reconstruct and climate- and disaster-proof the main electricity network in Ha'apai and damaged schools (outputs 1 and 2), and remove asbestos from damaged buildings (output 3).

A. Output 1: Reconstruction and climate- and disaster-proofing of the electricity network

9. The project will restore access to the electricity supply network and make it more resilient to extreme weather and disasters. Repairing the damage to these utilities—assessed at more than 90% of the Ha'apai network on 13 January—and upgrading them requires considerable investment. After the Government of New Zealand contributed \$1.4 million for the initial emergency restoration of power lines in Ha'apai, TPL prepared a plan and cost estimates for repairing and climate-proofing the electricity network.

10. The project will reconstruct the distribution network and upgrade its capacity from 6.6 kilovolts to 11.0 kilovolts. This will include (i) rebuilding about 15.2 km of high-voltage overhead bundle lines, (ii) constructing about 32 km of low-voltage overhead lines, (iii) reconnecting the underground cables of about 1,000 households and 30 commercial and government buildings to the TPL network, and (iv) constructing 2 km of underground cables of the Ha'apai Hospital and High School network. The project will also restore and climate-proof about 161 streetlights and purchase temporary solar lanterns and community solar chargers for about 100 households in the outer Ha'apai islands. This output will use the implementation arrangements established for the OIREP, which is being implemented by TPL.

B. Output 2: Reconstruction and climate- and disaster-proofing of schools

11. The project will support the reconstruction, restoration, and climate- and disaster-proofing of schools that were damaged in Ha'apai.² The reconstruction will include (i) constructing improved building structures (classrooms and staff quarters); (ii) providing appropriate water and sanitation amenities for schools; and (iii) installing necessary fixtures and furniture, such as blackboards, desks, and chairs. This will allow classes to resume in a safe environment that is conducive to learning; in the future, it will reduce the number of days that schools are closed because of extreme weather and natural disasters. The reconstruction will be implemented in two phases. Primary schools will be rebuilt first as most of them are government owned, were severely damaged, and serve half of the affected student population. Secondary schools will be selected for reconstruction in line with the government's secondary school rationalization policy and with the agreement of ADB. MET has provided a preliminary assessment of the damage, and the cost of reconstruction and building back better, including

² The damaged primary schools are Ha'ano, Fakakai, Mo'unga'one, Mata'aho, Lofanga, Faleloa, Fotua, Koulo, Pangai, and Tongoleleka. The damaged secondary schools are Ha'apai High School, Taufa'ahau Pilolevu College, St Joseph's Community College, Tailulu College, 'Ofamo'oni School, and Petani Christian Bilingual Side School.

demolition and removal of debris. This output will use the implementation arrangements set up under the CRSP.

C. Output 3: Removal of asbestos from damaged buildings

12. The project will support the removal of material containing asbestos from damaged schools, Niu'ui Hospital, government offices, and residential buildings. An assessment by the World Bank identified the presence of asbestos in these buildings.³ Since local knowledge on safe handling of asbestos is limited and Ha'apai does not have a site to dispose of asbestos, it will be removed to Tongatapu. This output will allow reconstruction works to be carried out safely.

III. TONGA'S ENVIRONMENTAL ASSESSMENT AND REVIEW PROCEDURES

A. EIA Review Procedures

13. The Ministry of Lands, Environment, Climate Change and Natural Resources (MLECCNR) is the agency responsible for administering environmental protection and management laws including requirements for environmental impact assessment (EIA). The Department of Environment and Climate Change (DECC) in this context was formally created by the Environmental Management Act 2010. The role of DECC is to protect the environment and promote sustainable development. Under the Act, the Director of DECC is empowered to inspect or investigate any facility or activity deemed to be causing potential impact on the environment. The Director also has the power to serve a notice to cease the activity, which takes effect immediately.

14. The Environmental Impact Assessment (EIA) Act was passed in 2003. Regulations to support the Act have recently been passed under the Environmental Impact Assessment Regulations 2010.

15. Under this regulatory framework, all development activities must be referred to the Minister of MLECCNR, either directly or through the Determining Authority. With this notification, the proponent must complete a *Determination of Category of Assessment* form, providing an overview of the proposed development and a number of details in relation to the existing environment, potential environmental impacts and mitigation measures. The secretariat and the Minister determine whether the proposed development is a minor or major project, and advises the proponent within 30 days. If it is a major project, the proponent then submits a full EIA for review by the secretariat, which makes recommendations to the Environmental Assessment Committee (EAC). The Minister receives an assessment report and issues the approval (with or without conditions), a request for further information, or a rejection. The schedule outlining major projects as per the EIA Act 2003 is provided in **Annex 1**. However, under the regulations, a development proposal not reflected in this schedule may still be deemed as a major project through the determination of category process.

³ World Bank. 2014. *Asbestos Assessment Report, Cyclone Ian*. Nuku'alofa. Commissioned by the Government of Tonga.

B. Local Capacity for Environmental Assessment

16. The recent ADB Country Environment Review for Tonga highlighted one of the serious constraints to sustainable development as a lack of capacity and resources within DECC to act as an independent regulator for the environment.⁴ Development permit conditions are not currently followed up to ensure that implementation has occurred, and DECC does not have the resources to monitor environmental impacts from individual developments. This results in a reactive rather than proactive environmental management context.

17. The capacity of DECC to review environmental impact assessments and make appropriate recommendations to protect the environment is adequate. This capacity however is compromised by the lack of resources to follow up environmental development conditions, monitor, evaluate and prescribe corrective actions when necessary. This has been identified as a key area of weakness. In addition assessing impacts is also problematic for development on the outer islands, with DECC offices on Ha'apai and Vava'u island groups playing an administrative role and not having staff skilled in EIA. This is compounded by a limited departmental budget for qualified staff to travel from Nuku'alofa to investigate issues on site. A further constraint is the limited capacity within Tonga of local consultants to conduct professional EIAs when the work is outsourced.

18. **Annex 2** provides the terms of reference (TOR) for the (i) local environmental management specialist, as well as the TOR for the (ii) International Climate Change Adaptation specialist to be recruited for project implementation assistance under the CRSP. It also contains the TOR for the International Environmental specialist to be recruited for the OIREP PMU. In addition to preparing the assessments required for activities and investments made under this project, the TORs cover how the consultants will work with the PMU members of the OIREP project and the Program Implementation Unit (PIU) members of the CRSP.

IV. ANTICIPATED ENVIRONMENTAL IMPACTS

19. In anticipating environmental impacts for the two core components, screening will cover three aspects: siting, construction, and operations.

20. The core components identified comprise activities in two sectors. A number of environmental issues will potentially arise, as outlined in Table 1. The mitigation measures provide general guidance, but as part of the assessment process will be adapted to suit the particular development activities.

Subprojects Anticipated Environmental Impacts	Mitigation Measures
Loss of biodiversity	Particular care must be taken to avoid clearance of mangrove areas or impacts on marine ecology. Siting of components will also be undertaken to minimize land clearance. Clearance of any trees of significance within the urban area is to be avoided.
Loss of land and / or livelihoods	Facilities should avoid land acquisition or resettlement impacts if possible. If land acquisition is required, or if livelihoods will be impacted, the

⁴ ADB 2010: Country Environment Review, Tonga. Manila.

	procedures within the resettlement framework are to be followed to ensure that appropriate compensation is paid.
Loss of physical cultural resources	Components that are likely to cause permanent damage to irreplaceable cultural relics and archaeological sites will be ineligible. As a component of environmental assessment, any minor or moderate impacts must be fully addressed, with all efforts made to avoid damage and to provide restitution wherever possible.
Land clearance	Trees of significance in the urban landscape are to be preserved. All land clearance to be undertaken should minimize loss of vegetation.
Noise emissions	Mitigating impacts of noise emissions, particularly during construction, will be achieved through appropriate contracting requirements and supervision. Limiting construction to standard daytime work hours minimizes disruption to households. Plant and machinery will be required to be well maintained to reduce noise emissions. Noise emissions from component operations will be minimized through appropriate siting and mitigation measures.
Dust emissions	Dust can be controlled through minimizing areas of exposed soil, and using mitigations such as water carts to suppress dust emissions, or covering of fill / sand stockpiles.
Worker and community health and safety	Safety is of primary importance in infrastructure development. All contractors will be required to adhere to strict Occupational Health and Safety (OH&S) requirements to ensure that workers health and safety are not compromised through project activities. Appropriate levels of contractor supervision are to be undertaken by the CRSP and OIREP PMU to ensure all safeguards are practically implemented, including training of site staff. This also extends to the health and safety of the public. With civil works often requiring trenching or construction works, all sites must be adequately fenced, signed and lit at night to avoid any hazards to the community. All contractors will be required to submit a health and safety plan for approval by the CRSP PIU and OIREP PMU prior to commencement of works.
Loss of amenity	Siting of facilities needs to take into account any aesthetic or social values of the area. This is particularly relevant when siting power supply infrastructure, ensuring that there is no significant loss to landscape values or general amenity.
Disruptions to businesses and communities	Disruptions can occur, particularly through activities such as siting power supply infrastructure construction. These disruptions need to be minimized through effective consultation and dialogue, and planning works to minimize disruptions. Measures can include

	increasing the workforce in priority areas, and providing temporary access points for vehicles or pedestrians across trenches. Any significant disruptions to livelihoods will need to be addressed and compensated as per the requirements of the resettlement framework.
Siltation of surrounding drains and water	Backfilling of excavated trenches is to be done immediately on completion of works. Silt fences will be used to prevent clogging of drains. Sand piles will be covered as required, particularly during periods of heavy rain.
Soil erosion	Limit the amount of soil exposed during construction works, and replant / seal finished areas as soon as practical. Bring soil or sand stockpiles to the site only as required. Use sediment trap fencing as required.
Production of solid waste materials	All waste materials to be produced will be projected beforehand, with appropriate disposal planned. The contractor will supply bins at work sites, and remove waste appropriately according to the World Bank Ha'apai waste disposal plan after all efforts are made for resource recovery and recycling. Any potentially hazardous wastes are to be avoided wherever possible through material substitution. Disposal of potentially hazardous wastes should also occur with the advice of the World Bank Ha'apai waste disposal plan.
Pollution prevention and abatement	Secure and control storage of all toxic and hazardous materials including fuels. Spill kits are to be kept at fuel storage points. Integrity of the water quality is to be protected through appropriate siting and mitigation measures. Air pollution is to be avoided, with practices such as burning of waste not permitted.
Water pollution	Pollution of groundwater must be avoided. Effluent outfalls to the marine environment are also to be avoided.
Marine resources	Coastal resources are important from an ecological and livelihood perspective. Impacts such as adding nutrient loads into the marine environment or removing marine or estuarine resources are to be avoided altogether, or mitigated through appropriate design and rehabilitation measures.
Sustainable resource use	Projects must consider the use of nonrenewable resources such as quarry materials, water, and fossil fuel-generated power. Resources are to be conserved wherever possible, and when used, mitigation measures that address the sustainability aspects of resource use must be put in place. Offsetting may be considered as a mitigation measure (e.g., planting trees to off-set carbon emissions). Energy efficiency, cleaner production, and resource conservation are all

	principles to be considered, and where relevant incorporated.
Social impacts	Social benefits and impacts need to be assessed, with mitigation measures in place to ensure minimum disruption to the community, and provision of tangible outcomes to improve quality of life in the urban sector. Impacts must also be analyzed for who bears the burden, taking care to avoid inequitable burdens on vulnerable groups such as the poor or women.
Climate change	The potential impacts of climate change must be considered, with mitigation measures put in place where considered beneficial. These may include implementation aspects such as coastal erosion protection measures, or design adaptations.

V. ENVIRONMENTAL ASSESSMENT FOR PROJECT COMPONENTS

A. Environmental Criteria for Core Component

21. Under this disaster response project, no category A subproject will be funded, that is, projects that are likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented. This includes transboundary or cumulative impacts. This implies that subprojects or activities under this project are confined to categories B and C, requiring an initial environmental examination (IEE) or due diligence report, respectively.

B. Specific Procedures for Environmental Assessment

22. There are nine steps to be conducted for the environmental assessment process for core components outlined in this section.

23. **Initial screening** for eligibility of the core components was determined by Government priority recovery needs following the aftermath of Cyclone Ian. These core components were then subject to initial classification according the ADB classification system. As the components will include activities that will likely create impacts that are site-specific, few if any effects are irreversible, and mitigation measures can be readily identified and implemented, the project is categorized as B. An IEE and environmental management plan (EMP) are required. Category C projects are unlikely to have adverse environmental impacts and require no assessment. However environmental implications still need to be closely reviewed and a due diligence report prepared. Categorization is established by defining the most environmentally sensitive component and the extent and duration of the potential impact.

24. **Scoping** is the second step in the process, defining the boundaries and time scale for assessing impacts, mitigation, and monitoring. Some projects may require the analysis to go beyond the life of the infrastructure and address post closure or rehabilitation issues. Most disaster recovery infrastructure investment project environmental assessments will focus predominantly on construction, but this must be reviewed on a case by case basis.

25. **Baseline environmental conditions** will require review and analysis as steps in the project's assessment mode. Documenting baseline environmental conditions includes land use, water and air quality, biodiversity, soils, geology, topography, climate, physical cultural

resources, and socioeconomic conditions. This step involves fieldwork to document existing site conditions, as well as the review of relevant reports. In some instances, detailed testing is warranted for conditions such as existing water quality.

26. **Predicting likely impacts** requires a thorough analysis of potential environmental impacts and proposed mitigation measures. Table 1 provides an overview of the types of impacts that may occur, but the analysis must be project and site specific rather than generic. Any environmental issues that are likely to have an inequitable impact on women or disadvantaged groups need to be given particular attention with appropriate measures put in place to either reduce this impact or provide adequate compensation.

27. **Public consultation, information disclosure, grievance redress mechanism.** Consultation and disclosure are required throughout the environmental assessment cycle, providing not only the mechanism to inform the community of the proposed subproject, but also to receive inputs into potential impacts and appropriate mitigation measures. Consultation with relevant government officials, the business community, and nongovernmental organizations (NGOs) will assist in providing a number of perspectives. Direct consultation with and accessible information disclosure to any people affected by the proposed subproject is an imperative to understanding the existing situation and providing effective means to mitigate any environmental impacts for people in the immediate area. The grievance redress mechanism (GRM) is meant for people seeking satisfactory resolution of their complaints on the environmental performance of the project. The mechanism will ensure that (i) the basic rights and interests of every affected person by poor environmental performance of the project are protected; and (ii) their concerns arising from the poor environmental performance of the project during the phases of design, construction and operation activities are effectively and timely addressed.

28. **Preparation of an EMP** provides the implementation mechanism for the mitigation measures. The document needs to provide practical and relevant means to achieve the environmental safeguards. It includes delineation of roles and responsibilities, how each impact will be mitigated, and the monitoring program to ensure that the response has been adequate. When a subproject is in the implementation phase, with the contractor appointed and mobilization planned, the PMU/PIU will review and update the EMP to ensure its relevance.

29. **Implementation mechanisms** are important to define at the outset. Responsibilities as allocated in the EMP are to be understood and agreed to. The capacity of each of the players needs to be evaluated as a part of the environmental assessment process, with appropriate training or capacity development incorporated into the subproject to underpin effective implementation. Relevant EMP mitigation measures are to be incorporated into the bidding documents, with the contractor to describe and cost them. Relevant penalties must be included within the contract to ensure compliance. Prior to the commencement of works, the contractor will prepare a contractor EMP and a health and safety plan for approval by the PMU/PIU. The monitoring process must be practical and effective, providing an assurance that safeguard measures are implemented.

30. **Costing mitigation and monitoring measures** provides for adequate resourcing. Costs covered within civil works budgets should not be double-counted, requiring good communication between the environmental assessment staff and the technical project designers. Monitoring will be undertaken to establish baseline parameters where necessary and to ensure compliance of the contractor with the approved EMP.

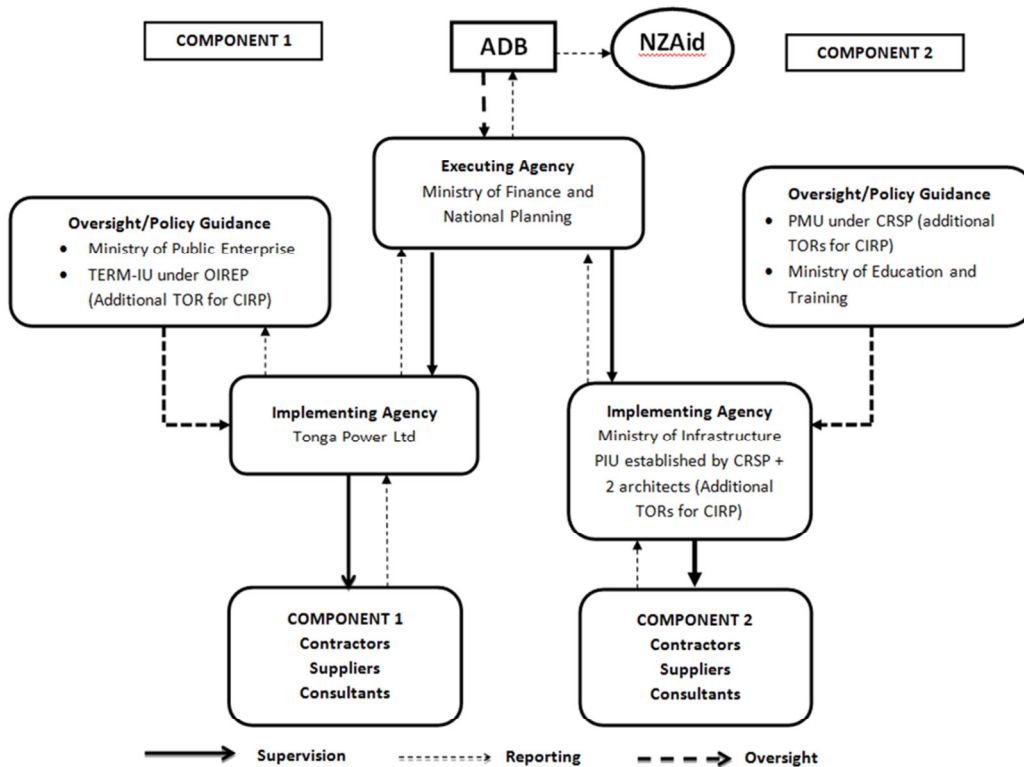
31. **Reporting** is the final step in the process, although all steps require documentation to compile the final report. The preparation of environmental assessment documentation will be based on the ADB SPS of 2009, and will also comply with the requirements of Tonga’s EIA Act 2003 and EIA Regulations 2010. It is imperative in this context that monthly reports are provided by contractors on any environmental incidents that impacted on the environment. This will feed into quarterly reports of the IAs and substantiate semi-annual or annual safeguard monitoring reports to ADB.

VI. INSTITUTIONAL ARRANGEMENTS AND RESPONSIBILITIES

A. Implementation Arrangements

32. An overview of the institutional arrangements for project implementation is presented in Figure 1.

Figure 1 – Project Implementation Structure



33. **Project executing and implementing agencies.** The MFNP will be the executing agency. TPL and the Ministry of Infrastructure (MOI) will be the implementing agencies, with the MET, the Ministry of Public Enterprises, and the Tonga Energy Road Map Implementation Unit providing oversight.

34. **Output 1.** TPL, through the project management unit (PMU) established under the OIREP, will be the implementing agency. TPL will conduct the final technical and engineering designs and bidding process. TPL staff will carry out the design, supervision, and installation work. ADB will finance the incremental labor costs TPL incurs in carrying out the project civil works, using force account, that is, its own resources to finance certain required approved civil works required for the project. TPL will use ADB disbursement procedures and financial management guidelines. TPL will maintain separate accounts for the project, which will be audited by an independent auditor. All procurement of goods and works will be undertaken following ADB’s Procurement Guidelines (2013, as amended from time to time). ADB will review the design and works periodically. The Ministry of Public Enterprises and the Tonga Energy Road Map Implementation Unit will provide national policy oversight for output 1. Repeat orders will be used for procuring miscellaneous electrical equipment, high-voltage cables, and the supply of power poles from TPL’s existing suppliers that were selected using competitive procedures. This will allow TPL to start reconstruction works immediately.

35. **Output 2.** MOI, through the project implementation unit (PIU) established under the CRSP will be the implementing agency. The CRSP PMU under the Ministry of Land, Environment, Climate Change, and Natural Resources will assist in coordinating and overseeing implementation of output 2, with advice from the MET. The CRSP procurement project committee, chaired by the MFNP, will oversee procurement. The MET will provide national policy oversight on the design of schools. All procurement of goods and works will be undertaken following ADB’s Procurement Guidelines (2013, as amended from time to time). The MOI will carry out the technical specifications and detailed designs for the schools with support from the PIU and two architects funded under this recovery project.

36. **Output 3.** MOI will be the implementing agency and the implementation arrangements for output 2 will be adopted. A single contractor will be hired to undertake the removal of material containing asbestos. All procurement of goods and works will be undertaken following ADB’s Procurement Guidelines (2013, as amended from time to time). The implementation arrangements are summarized in Table 4 and described in detail in the project administration manual.⁵

37. Environment and social safeguards will be monitored by international and national specialists within the OIREP PMU and CRSP PMU. The results of the safeguard monitoring will be reported in the IAs quarterly reports. Additionally, the twice annual review missions will report on safeguard compliance.

Table 3 – PMU/PIU Safeguards Compliance team

CRSP PMU	
-----------------	--

⁵ Project Administration Manual (accessible from the list of linked documents in Appendix 2).

International	National
Climate Change and Disaster Risk Adviser Adviser	Climate Change Program Coordinator
Climate Adaptation Engineer	Gender & Community Development Specialist
Social Safeguard Specialist	Environment Management Specialist
OIREP PMU	
Social Safeguard Specialist	
Environment Specialist	

B. Implementation Responsibilities

Table 4 - Implementation Responsibilities

Organization	EARF Implementation Responsibilities
ADB	<ul style="list-style-type: none"> - Confirm categorization of subprojects/activities Review and approve IEEs. - Screen projects for compliance with safeguard requirements and ensure that appropriate measures are in place to avoid, minimize, mitigate, and compensate for adverse environmental impacts - Review and approve quarterly project and EMP monitoring reports. - Monitor and supervise client's environmental performance throughout the project cycle. - Disclose environmental assessments and monitoring reports on the ADB website. - If a client fails to meet safeguard obligations, ADB will seek corrective measures and work with the client to reinstate compliance.
Executing Agency Ministry of Finance and National Planning	<ul style="list-style-type: none"> - Overall responsibility for management of the project. - Submit component IEEs from relevant IAs to ADB. - Submit any updates or changes to component IEEs to ADB for approval. - Chair of the project steering committee.
Organization	EARF Implementation Responsibilities
Implementing Agency Ministry of Infrastructure	<ul style="list-style-type: none"> - Establish appropriately staffed and qualified PIU with responsible environment and social responsibilities under the CRSP PMU. - Overall responsibility for applying the EARF to prepare each IEE and EMP for subprojects. - Ensure compliance with ADB Safeguard Policy 2009. Update subproject EMPs or IEEs if required after detailed design stage. Any changes need to be submitted to the EA, which will submit to ADB for approval. - Ensure that all relevant EMP mitigation measures are integrated into civil works bidding documents, along with financial penalties for breaches and the requirement for the

	<p>contractor to pay for mitigation measures.</p> <ul style="list-style-type: none"> - Provide training to contractor prior to preparation and submission of contractors construction EMP (CEMP) - Assess the contractor’s proposed environmental mitigation measures and costs, and its capacity to implement them as a part of the bid evaluation process. - Approve contractor’s CEMP in consultation with ADB. - Provide contractor with induction prior to commencement of any site works. - Monitor contractor’s compliance with the CEMP. Undertake necessary actions to address noncompliance of CEMPs. - Submit monitoring reports to EA and ADB and provide inputs on safeguards to quarterly progress reports
<p>Implementing Agency Tonga Power Limited</p>	<ul style="list-style-type: none"> - Establish appropriately staffed and qualified PMU. - Prepare and submit IEE to MLECCNR along with a <i>Determination of Category of Assessment</i> form, and provide any further information as requested by MLECCNR. - Obtain necessary permit from MLECCNR to proceed with core component. - Update subproject EMPs or IEEs if required after detailed design stage. Any changes need to be submitted to the EA, which will submit to ADB for approval. - Ensure that all relevant EMP mitigation measures are integrated into civil works bidding documents, along with financial penalties for breaches and the requirement for the contractor to pay for mitigation measures. - Provide training to contractor prior to preparation and submission of contractors construction EMP (CEMP) - Assess the contractor’s proposed environmental mitigation measures and costs, and its capacity to implement them as a part of the bid evaluation process. - Approve contractor’s CEMP in consultation with ADB. - Provide contractor with induction prior to commencement of any site works. - Monitor contractor’s compliance with the CEMP. Undertake necessary actions to address noncompliance of CEMPs. - Submit monitoring reports to EA and ADB and provide inputs on safeguards to quarterly progress reports
<p>Organization</p>	<p>EARF Implementation Responsibilities</p>
<p>Environment and Social Compliance Team (within CRSP and OIREP)</p>	<p>Direct responsibility for implementing the EARF under the PMU, including the following;</p> <ul style="list-style-type: none"> - Undertake rapid environmental assessment screening of project components for feasibility, and classify according to ADB categories, reporting to the PMU. - Conduct the IEE or environmental review for selected subprojects, with the assistance of project implementation consultants, and provide to EA - Conduct consultation and disclosure events during project preparation and implementation, facilitating informed participation. - Submit the assessments to DECC for clearance under national law and obtain development consents - Coordinate the grievance redress mechanism in accordance with the procedure outlined in EARF. - Provide training to contractor prior to preparation and

	<p>submission of contractors construction EMP (CEMP)</p> <ul style="list-style-type: none"> - Assess the contractor's proposed environmental mitigation measures and costs, and its capacity to implement them as a part of the bid evaluation process. - Approve contractor's CEMP in consultation with ADB. - Provide contractor with induction prior to commencement of any site works - Implement all environmental monitoring as outlined in each subproject's EMP. - Preparing quarterly EMP progress reports for inclusion in the Project quarterly progress reports for PMU/PIU to submit to EA. - Liaison and communication with stakeholders and general public on objectives of subprojects, and environmental risks, mitigation measures, and outcomes. - Submit an environmental subproject completion report to the ADB within 3 months of completion; detailing all aspects of environmental performance compared to the EMP, and measures in place to mitigate potential impacts during the operational phase. <p>Prepare semi-annual safeguards monitoring reports to the EA and ADB</p>
Contractors	<ul style="list-style-type: none"> - Prepare CEMP and health and safety plan, to meet the environmental mitigation measures outlined in the bidding document. - Plans to be approved prior to works commencing the CEMP will be a binding document covering the following aspects: name of the supervising engineer for the contractor and nomination of the environmental manager and back-up person for the contract duration, scope of works and plan of works, machinery and equipment to be brought to the site, quarry sites used for any road and construction materials, environmental protection work procedures, staff training for contractor EMP compliance, and monitoring contractor EMP implementation and providing PMU/PIU with monthly reports. - Implement GRM as appropriate and maintain a complaints/grievance record. The records will be the subject of monitoring. - Implement contractor EMP with the assigned staff member responsible for monitoring measures in place, and the effectiveness of these measures. - Report any environmental or health and safety incident to PMU/PIU.

C. Staffing Requirements and Budget for EARF Implementation

38. Table 5 summarizes the estimated staffing requirements for EARF implementation for each project activity

Table 5 – EARF Implementation Budget

Organization	Responsible Personnel	Person Months
CRSP PMU	Climate Change and	12

	Disaster Risk Adviser (international)	
	Climate Adaptation Engineer	7
	Environmental Management Specialist (national)	60
OIREP PMU	Environment Specialist	2
	Social Specialist (Community and Gender)	2

39. The GoT will provide assistance in environmental screening through DECC's EIA unit. All positions as above however will be funded by the project grant and is included in the costing.

VII. PUBLIC CONSULTATION AND INFORMATION DISCLOSURE

40. Both OIREP and CRSP include procedures for consultation. Meaningful public consultation is required throughout the project cycle to ensure that potential environmental and social impacts are fully disclosed, and mitigation measures are appropriate. The following are the key principles to be followed for consultation processes:

- (i) Adequate and relevant information is disclosed in a timely manner.
- (ii) Information is readily accessible and understandable to affected people.
- (iii) Consultation is undertaken in a non-threatening atmosphere, ensuring that all dialogue is free from intimidation or coercion.
- (iv) Processes are gender inclusive and responsive, and tailored to meet the needs of disadvantaged and vulnerable groups.
- (v) Consultation is meaningful, with all relevant views of stakeholders and affected people taken into account for decision making in areas such as project design, environmental mitigation measures, sharing of development benefits and opportunities, and implementation issues.

41. In undertaking implementation of the project, an extensive consultation will be undertaken with relevant stakeholders. Key issues of environmental concern will be discussed, particularly with MLECCNR, MOI, MET, TPL, civil society and communities. These will be conducted through thorough consultation implemented through household surveys; public meetings with media coverage; focus group discussions; and detailed interviews with town and district officers, church and community groups, and other relevant stakeholders. This level of engagement, beyond simple information provision, recognizes all partners in the development process and provides input into a robust project design and implementation. Up-front dialogue from an early stage will often prevent unnecessary and costly project delays during implementation.

42. Ongoing dialogue during construction and implementation provides for greater accountability, strengthening the relationship between implementers and beneficiaries, and enhancing results achieved. Efforts to strengthen communication with women and any socially disadvantaged groups are required so that consultation processes empower all people to contribute and do not inadvertently exclude people.

43. A public information brochure will be developed for the overall project. While it provides a general overview of the whole program, it will also outline the commitment to undertaking the development with minimal environmental impacts. The information brochure, will be updated during implementation to incorporate IEE process, translated into Tongan and can be used as a model for future disaster related recovery projects.

44. Meaningful public participation is encouraged throughout the project cycle using a range of mechanisms. Public consultation will be conducted at national and sector levels, and include environmental, social, and resettlement presentations. Meeting highlights from the initial project inception briefing and discussion will be broadcast on TV and over the radio. This will seek to confirm the disaster related priority components for investment under the project. A follow-up public discussion will also be facilitated seeking input on how to improve outcomes of the project. In each of these forums, sustainability will be a key issue of discussion, particularly the means to better implement this project within the Tongan context.

45. Documenting all public consultation and information disclosure is important to provide a transparent overview of dialogue within the context of environmental assessment. A record of meetings needs to include an overview of invitees, attendance, and details of how information has been disclosed, and any pertinent issues raised in each public forum. See **Annex 4** for a summary of the information to be documented and an example of the type of meeting minutes that may be taken. Consultation summaries are to be provided as an annex to the IEE.

VIII. GRIEVANCE REDRESS MECHANISM

A. General Principles

46. ADB requires that a grievance redress mechanism (GRM) be established and maintained. It should be designed to efficiently receive and facilitate the resolution of affected peoples' concerns and grievances about project-level social and environmental issues within a reasonable timeframe. The GRM should be scaled to the risks and impacts of the project. It will address affected people's concerns and complaints promptly, using an understandable and transparent process that is gender responsive, culturally appropriate, and readily accessible to all segments of the community. The GRM may be revised once the project commences to ensure that its provisions are relevant and practical. It should also be updated as required during the construction process, to optimize the redress process. GRMs were established in both CRSP and OIREP and will be employed for this project.

47. During project implementation, it is possible that people may have concerns about the project's environmental performance. People may perceive negative impacts during the construction or operational phase, and they have the right to have their complaint fairly heard and acted on. Many issues can be resolved effectively through timely communication, inquiry, and mitigation measures.

48. The grievance redress process will be widely disseminated to all affected people during project consultations, focus group discussions and the resettlement plan census. It will be contained in the public information brochure distributed to each affected household/business during the census. The GRM is in place for all safeguard issues, providing a streamlined process for any concerns or issues in relation to resettlement, social safeguards, and environmental impacts.

49. Consideration of the grievance process should be given to both the construction and operational phases. Environmental impacts from operations are considered within an IEE and EMP, and as such breaches to the EMP in operations need to also provide a GRM. In the post project period, this GRM will usually revert to the mechanisms available within the facility operator's procedures, or within an external agency such as MLECCNR.

B. Grievance Coordination

50. A grievance focal point (GFP) will be established by the district/town Officer to coordinate and address all complaints and concerns arising from the project. The contact details will be provided to all affected persons.

51. The GFP will be assisted and supported by the CRSP PIU and OIREP PMU who will maintain a register of complaints, keep track of their status, and report to the EA. They will regularly track complaints received, actions taken and the status of resolution. All communications with the affected person(s) will be documented, and whether management action has been taken to avoid community concerns in the future. Complaint forms will be distributed to the GFP to facilitate recording of complaints.

C. Grievance Procedures

52. Affected persons will be informed that they should ask any questions or discuss grievances with their community leader or the district/town GFP by phone or in person; or to project staff visiting the area. The GFP is encouraged to discuss the issue with the contractor or ESU, as often minor environmental impacts can be remedied with immediate action.

53. If these questions/grievances are not answered within 1 week, they should be prepared in writing (using the assistance of the local community leader, church, or school if necessary). The complainant will also be informed that national and international project staff could assist them with writing a grievance if necessary.

54. Written complaints can be sent or delivered to the CRSP PIU and OIREP PMU, where they will be registered as being received, and will be treated confidentially. The PMUs will have 1 week to deliver a resolution to the affected person.

55. In the event that a satisfactory answer cannot be provided, the affected person may lodge the complaint with the Minister of MLECCNR and receive a reply within 7 days.

56. In the event that the situation is not resolvable, or the complainant does not accept the decision, the affected person(s) may have recourse to the land court (or other relevant court). All court costs (preparation and representation) will be paid for by the project, regardless of the outcome.

57. Table 6 outlines a summary of the grievance resolution process established under the existing projects and to be applied to the project components.

Table 6: Grievance Resolution Process

Stages in Response Handling	Required Activities
-----------------------------	---------------------

Village head or district/town GFP	<ul style="list-style-type: none"> - Registers the written complaint and attempts to resolve it with the affected person within 1 week. - Verbally responds to questions and or complaints. May represent affected person in direct discussions with contractor or safeguards team. - If no response within week, or response is unsatisfactory, affected person prepares a grievance in writing (utilize standard forms where possible).
-----------------------------------	--

Stages in Response Handling	Required Activities
CRSP PIU and OIREP PMU	<ul style="list-style-type: none"> - Registers the written complaint and attempts to resolve it with the affected person within 1 week. - If a solution is not reached, the PIU/PMU refers it to the Minister, MLECCNR
Minister MLECCNR	<ul style="list-style-type: none"> - Consults with other ministers, the GFP, and PMU/PIU in the resolution of complaints. - Makes a decision within 1 week. - If the decision is still unacceptable to the complainant, she/he may take it before the Land (or other relevant) Court, with all costs paid for by the project.
Land (or other) Court	The court hears the case and makes a final decision that is binding on all parties.

58. In the post project period, there remains the potential for environmental harm to occur through the operations of the subproject systems. The GRM would revert to existing systems of environmental protection. Persons or groups can seek resolution of a grievance in relation to environmental harm through directly triggering the environmental complaint and investigation mechanism existing within DECC. Any complaints in relation to environmental matters are referred immediately to the Director of DECC. After assessing the nature of the complaint, it is delegated to the relevant staff member to investigate and report on the complaint and follow-up action taken.

IX. MONITORING ENVIRONMENTAL PERFORMANCE AND REPORTING

59. The EMP for each core component will define how mitigation measures prescribed in the IEE are to be monitored during the design, construction, and operational phases in addition to the need for any baseline monitoring and follow-up surveying. The EMPs in the assessments will be updated during detailed design and be integrated into the bid documents for all subprojects/activities. The contractor(s) must have prepared and submitted the construction EMP (CEMP), which will be approved by the PIU/PMU before any construction can commence.

60. Monitoring procedures will include documentation of who is responsible for each monitoring action, and the timeframe and schedule for monitoring activities. Each of the three project stages of preconstruction, construction, and operation requires monitoring to be designed and implemented.

61. Good monitoring practice requires a monitoring report to be completed according to the following schedule:

- (i) a report at the end of project design (prepared by the CRSP PIU/ OIREP PMU)
- (ii) a monthly report prepared by the contractor during construction

- (iii) a report prepared every quarter by the PIU/PMU for ADB, and
- (iv) an annual report that is prepared by the operating agency during operation for as long as the monitoring is specified in the EMP.
- (vi) Semi-annual safeguards monitoring reports

62. The design of the individual monitoring program within each EMP needs to be commensurate with the level of environmental impact predicted, and the complexity of mitigation measures.

ANNEX 1: CLASSIFICATION OF MAJOR PROJECTS IN TONGA

Kingdom of Tonga's Environmental Impact Assessment Act, 2003

Schedule - Major Projects

Any of the following activities shall be deemed to be major projects;

- (i) Abattoirs;
- (ii) brewery works;
- (iii) building, works, or land associated with the landing, take-off, parking or servicing of aircraft or helicopters;
- (iv) canning and bottling works in excess of floor space 2000 square meters;
- (v) cattle feeding or intensive piggeries with excess of 50 animals;
- (vi) cement works or concrete batching works in which more than 2,000 tons per annum are manufactured;
- (vii) ceramic work, being works in which excess of 200 tons per annum are produced of brick, tiles, pipes, or glass are manufactured in furnaces or kilns;
- (viii) chemical factories, or chemical storage areas in excess of 1,000 square meters'
- (ix) electricity generating stations;
- (x) marinas (comprising pontoons, jetties, pier, dry storage, mooring) for more than 20 vessels primarily for pleasure or recreation;
- (xi) mining, being an activity that disturbs the surface of the land in excess of one hectare;
- (xii) sand and gravel extraction from any beach within 50 meters of the high tide mark;
- (xiii) liquid, chemical, oil, or petroleum refineries, storage or waste processing works;
- (xiv) farms for the propagation of marine, estuaries, or freshwater organisms;
- (xv) pre-mix bitumen works;
- (xvi) rubber on plastic works;
- (xvii) the removal of trees (including mangroves) or natural vegetation of any area in excess on half a hectare;
- (xviii) construction of road, wharfs, barrages, embankments, or levees which affect the flow of tidal waters;
- (xix) any facility involving the use, storage, or dumping of nuclear materials;
- (xx) sawmills where more than 2,000 cubic meters per annum of timber is sawn, milled, or machined in any way; or
- (xxi) tourism or recreational resorts, buildings or facilities involving a total building floor area of greater than 1,000 square meters or a potential total overnight accommodation level (visitors and staff combined) in excess of 20

ANNEX 2: TOR FOR ENVIRONMENTAL SPECIALISTS

1. Climate Change and Disaster Risk Adviser (CCDRA) – International under CRSP PMU (12 person-months over 5 years)

The international adviser will have substantial experience addressing climate change and disaster risk issues in the Asia-Pacific region, especially through involvement in the actual implementation of a range of physical projects. As the international adviser with the most planned inputs to the PMU, he/she will play an important role in ensuring continuity of advice and monitoring processes throughout the whole program. He/she will work closely with the international Climate Adaptation Engineer (CAE) throughout. The CCDRA will be a qualified climate change adaptation expert or environmental engineer and will have at least 15 years of work experience with at least 10 years of specific CCA and DRM experience advising on project implementation. Previous direct project experience in Tonga is preferred. The CCDRA will (on an annual basis):

- a) Act as the international liaison between ADB, the PMU and the MLECCNR for the duration of each input.
- b) Advise on undertaking detailed environmental and engineering surveys and site investigations to be carried out by others;
- c) Report regularly to the CCPC on current international projections on climate change and research on CCA/DRM which may be relevant for Tonga and for SPCR projects in particular.
- d) Report regularly to the CCPC on progress and performance of civil works, and identify any critical environmental issues which require attention.
- a) Assist the CAE to identify Quality Assurance issues in the Project arising from the design and construction of physical works, and bring these to the attention of the CCPC, if they are not able to be promptly and effectively resolved at site.;
- b) Undertake regular field visits to all project sites to monitor implementation and supervision of project physical works, to confirm that specified quality standards are being achieved and contribute to resolving any QA issues arising;
- c) Assist to manage/participate in programs for on-site audit checks during the execution of physical works (construction and maintenance), of quality control, and provide advice on remedial actions as required;
- d) Assist with the certification of the quality of all works, based on on-site approvals by the PIUs;
- e) Assist the CAE to train PIUs on QA procedures for construction and subsequent maintenance of the different types of physical infrastructure in the Project
- f) Contribute to the preparation of project reports such as IEEs; review EMPs, and participate in regular co-ordination meetings with PIUs; and
- g) Assist and cooperate with other specialist members of the PMU under the direction of the CCPC

2. Climate Adaptation Engineer – International under CRSP PMU (7 person-months over 3 years)

The Climate Adaptation Engineer (CAE) will be responsible for overseeing the implementation of the pilot climate proofing projects, for providing advice on other engineering aspects of SPCR project activities as well as providing assistance in the design and implementation of community

projects seeking funding through the national climate change trust fund. The CAE will work closely throughout with the international Climate Change and Disaster Risk Adviser (CCDRA) and with the individual PIUs for each project.

The CAE will be a senior qualified civil engineer with qualifications in civil/ structural engineering and a background in project management, with at least 15 years extensive experience of the implementation of a wide range of infrastructure projects in the developing world, including the Pacific and preferably Tonga.

The CAE will (on an annual basis):

- a) Assist in checking and supervising detailed engineering surveys and site investigations carried out by others;
- b) Monitor on-site material and equipment storage and handling procedures, and environmental practices, and advise on remedial actions as required;
- c) Assist in the site supervision of all construction works to ensure that design standards and technical specifications are achieved, including use of appropriate construction methods, on-site quality control, and proper checking in accordance with the approved Quality Plans.
- d) Identify any issues related to the performance of field and laboratory testing which should be addressed
- e) Undertake spot checks with PIUs of works quantities presented for payment, and report on the quantity and quality of all works;
- f) Report regularly to the CCPC on progress and performance of civil works, and identify any critical issues which require attention.
- g) Identify Quality Assurance issues in the Project arising from the design and construction of physical works, and bring these to the attention of the CCPC, if they are not able to be promptly and effectively resolved at site.;
- h) Undertake regular field visits to all project sites to monitor implementation and supervision of project physical works, to confirm that specified quality standards are being achieved and contribute to resolving any QA issues arising;
- i) Assist to manage/participate in programs for on-site audit checks during the execution of physical works (construction and maintenance), of quality control, and provide advice on remedial actions as required;
- j) Assist with the certification of the quality of all works, based on on-site approvals by the PIUs;
- k) Train PIUs on QA procedures for construction and subsequent maintenance of the different types of physical infrastructure in the Project
- l) Contribute to the preparation of project reports, review bidding documents for environmental significance and participate in regular co-ordination meetings with PIUs; and
- m) Assist and cooperate with other specialist members of the PMU under the direction of the CCPC.

3. Environmental Management Specialist (EMS)– National under CRSP PMU (60 person months)

The EMS will be responsible for ensuring the quality and timeliness of the Component 3 project activities relating to improved eco-resilience and overall to ensure that projects follow the provisions of any previous environmental assessments to ensure that identified impacts are minimised and mitigating actions undertaken.

The EMS will have a minimum Masters Degree in a relevant field and at least 10 years experience working on environmental issues and climate change resilience in Tonga. The EMS will:

- a) Assist in facilitating participatory planning and governance activities and the implementation of the initial environmental examination recommendations; their proposed construction technology, and project implementation plan to identify any potential adverse impacts;
- b) Regularly review and report on the impact of project actions on the environment and determine the nature and extent of environment impact, if any, caused by the project;
- c) Assist the CCPC in reviewing all infrastructure designs, their proposed construction technology, and project implementation plan to identify any potential adverse environmental impacts;
- d) Undertake training of PIU staff to carry out initial environmental examination for its projects, awareness-building of and motivating stakeholders/ beneficiaries on environmental issues;
- e) Monitoring of the Environmental Monitoring Plan (EMP) and compliance progress toward the expected outcomes, verify monitoring information to identify adverse environmental impacts, document results, identify the necessary corrective actions, and reflect them in a corrective action plan;
- f) Take responsibility for the effective transfer of climate resilience principles to other key PMU staff, PIU staff and other stakeholders in the detailed design, construction and operation/maintenance of projects.
- g) Assist and cooperate with other specialist members of the PMU under the direction of the CCPC.

4. Environmental Specialist (ES)– International under OIREP PMU (2 person months)

The Environmental (ES) will be responsible for ensuring the quality and timeliness of environmental compliance with Output 1 project activities. This output will reconstruct the Ha'apai distribution network and upgrade its capacity. This will include (i) rebuilding about 15.2 km of high-voltage overhead bundle lines, (ii) constructing about 32 km of low-voltage overhead lines, (iii) reconnecting the underground cables of about 1,000 households and 30 commercial and government buildings to the TPL network, and (iv) constructing 2 km of underground cables of the Ha'apai Hospital and High School network. The project will also restore and climate-proof about 161 streetlights and purchase temporary solar lanterns and community solar chargers for about 100 households in the outer Ha'apai islands.

The ES will have a minimum Masters Degree in a relevant field and at least 10 years experience working on environmental issues in the power sector. The EMS will:

- (i) Lead the preparation of Initial Environment Examinations and the implementation of its recommendations; their proposed construction technology, and project implementation plan to identify any potential adverse impacts;
- (ii) Regularly review and report on the impact of project actions on the environment and determine the nature and extent of environment impact, if any, caused by the project;
- (iii) Assist TPL in reviewing all infrastructure designs, their proposed construction technology, and project implementation plan to identify any potential adverse environmental impacts;
- (iv) Undertake training of TPL staff to carry out IEEs for its projects, awareness-building of and motivating stakeholders/ beneficiaries on environmental issues;

- (v) Review and monitor the EMP and compliance progress toward the expected outcomes, verify monitoring information to identify adverse environmental impacts, document results, identify the necessary corrective actions, and reflect them in a corrective action plan; and
- (vi) Take responsibility for the effective transfer of environmental principles to other key TPL and PMU staff, and other stakeholders in the detailed design, construction and operation/maintenance of projects.

ANNEX 3: DOCUMENTATION OF PUBLIC CONSULTATION ACTIVITIES

Summary of Key Information Required for Consultation

CONSULTATION METHOD	DETAILS OF ACTIVITIES	CONSULTATION OUTCOMES
Public notice	Date(s) of notice	n/a
Location of notice		
Newspaper notification	Date(s) of notice	n/a
Name of newspaper		
Public announcement/ radio	Date(s) of announcement	n/a
Time(s) of announcement		
Newsletter / questionnaire	Date(s) sent	Number received
Number sent		Main issues raised
Area of distribution		
Feedback sought (Yes / No)		
Public meeting	Date(s) held	Meeting minutes attached (Yes / No)
Location(s) held		Attendees
Invitees		
Methods of invitation		
Agenda attached (Yes / No)		

Note: You may need to include agendas, list of attendees, minutes of meetings etc. as annexes to the EMP.

Example of Meeting Minutes Documentation

Name of Subproject:

Location:

Date:

Time:

Location:

MEETING AGENDA

1. Introduction

2. Presentation and key points.....:

PARTICIPANTS

Name (if possible) number, associated organization, gender.

QUESTIONS / COMMENTS OF PARTICIPANTS AT MEETING

1.

2.

3.

4. etc

REPLIES OF PRESENTORS

1.

2.

3.

4. etc

The meeting was at XXX the same day. All participants agreed with the minutes of meeting.

Signed by person taking minutes:

Position: