Environmental and Social Management Framework

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Vanuatu: Rapid Response Contingent Project for The Republic of Vanuatu: 2026–2036

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CURRENCY EQUIVALENTS
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Currency Unit	–	vatu (Vt)
Vt1.00	=	$0.0084
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ABBREVIATIONS

ADB	-	Asian Development Bank
BBB	-	Build-Back-Better
DEPC	-	Department of Environment Protection and Conservation (within MCC)
DGMW	-	Department of Geology, Mines and Water (within Ministry of Land and Natural Resources)
EAP	-	Emergency Action Plan
EPCA	-	Environment Protection and Conservation Act 2010 (as amended)
ESF	-	Environmental and Social Framework
ESSs	-	Environmental and Social Standards
ESMF	-	Environmental and Social Management Framework
ESMP	-	Environmental and Social Management Plan
GoV	-	Government of Vanuatu
LMP	-	Labor Management Procedures
MCC	-	Ministry of Climate Change, Meteorology and Geo-hazards, Environment, Energy, and Disaster Management
MFEM	-	Ministry of Finance and Economic Management
NDMO	-	National Disaster Management Office
RRCP	-	Rapid Response Contingent Project
VPMU	-	Vanuatu Project Management Unit

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I. INTRODUCTION

1. The Asian Development Bank (ADB) is supporting the Government of Vanuatu (GoV) through the proposed Rapid Response Contingent Project (RRCP). The RRCP will establish a pre-arranged crisis preparedness and contingent financing mechanism under ADB's Rapid Resource Reprogramming and Deployment Option (3RDO) framework. The project is designed to strengthen national readiness and enable the rapid deployment of repurposed sovereign portfolio resources following eligible crisis events.

2. The RRCP will support immediate response and early recovery activities following natural disasters, public health emergencies, and socio-economic crises through existing government systems and agreed activation procedures. The project will provide a framework for the rapid financing of emergency supplies, equipment, essential repairs, and livelihood support. It will complement existing disaster risk management systems and disaster risk financing instruments while strengthening institutional preparedness and response capacity throughout the project lifecycle.

3. The RRCP will enable the GoV to respond promptly and effectively to eligible crisis events by financing critical goods, services, and activities required to address the immediate needs of affected populations. The project has a national scope and will be implemented in accordance with the RRCP Project Administration Manual (PAM), which includes an Emergency Action Plan (EAP). The EAP will be reviewed and updated at least annually, and following each project activation, to incorporate lessons learned and strengthen future response arrangements.

4. The EAP establishes the conditions and procedures for activating the RRCP, identifies affected geographic areas and target beneficiaries, assigns implementation responsibilities, estimates resource requirements and implementation costs, and defines indicators for monitoring progress and assessing performance.

5. This Environmental and Social Management Framework (ESMF) has been prepared and adopted by the GoV to ensure that the Government, the executing agency (EA), the Vanuatu Project Management Unit (VPMU), and all implementing agencies (IAs) have the necessary procedures, resources, and capacity to identify, assess, and manage environmental and social (E&S) risks and impacts associated with activities financed under the RRCP. The ESMF is designed to facilitate the rapid mobilization of resources following project activation while ensuring compliance with applicable environmental and social requirements.

6. The ESMF establishes the environmental and social risk management requirements applicable to activities included on the RRCP Positive List of eligible expenditures. It has been prepared in accordance with ADB's Environmental and Social Framework (ESF), relevant Environmental and Social Standards (ESSs), and applicable national legislation and regulatory requirements. The ESMF applies to all activities financed under the RRCP and will be reviewed and updated, as necessary, upon each project activation to reflect the specific context, location, scale, and nature of the crisis response activities being implemented.

7. The overall environmental and social risk classification of the RRCP has been assessed as Moderate. The mitigation measures presented in this ESMF are based on applicable national legislation, relevant ADB ESS requirements, and the World Bank Group Environmental, Health, and Safety (EHS) Guidelines. Together, these measures provide a comprehensive framework for identifying, mitigating, monitoring, and managing E&S risks and impacts throughout project

implementation. The ESMF also includes stakeholder engagement requirements and a project-level Grievance Mechanism (GM), consistent with the requirements of ESS10.

8. Upon activation of the RRCP and the release of financing, implementing agencies will commence implementation of the approved response activities. This ESMF sets out a range of proportionate mitigation and management measures to address potential E&S risks and impacts associated with eligible activities. Implementing agencies are expected to apply the measures relevant to the specific activity being undertaken and may adopt alternative or additional measures where these are demonstrated to be more effective in managing identified risks and impacts. All activities will be implemented in accordance with applicable national legal requirements, the standard operating procedures of the National Disaster Management Office (NDMO) and relevant cluster coordination mechanisms, and the environmental and social risk management measures specified in this ESMF.

9. An Environmental and Social Screening Matrix (Annex 1) forms part of this ESMF and will be completed by the GoV upon activation of the RRCP. The screening process will identify the specific activities proposed for financing and capture details that may not be available during project preparation, including location, scale, implementation arrangements, and potential E&S risks and impacts. The completed screening matrix will be reviewed by the environmental and social specialists responsible for the project to confirm that activities remain consistent with the project's Moderate risk classification and that the management measures set out in this ESMF are adequate. Where necessary, additional mitigation measures, management plans, or corrective actions will be identified and implemented prior to commencement of the relevant activities.

II. ASSESSMENT OF LEGAL FRAMEWORK AND INSTITUTIONAL CAPACITY

A. Legal and Regulatory Framework

10. Project activities financed under this project will be implemented in compliance with the applicable laws and regulations of the GoV as well as the requirements of ADB's ESF. Relevant legislation includes laws relating to environmental protection and management, occupational health and safety, labor and working conditions, land administration, cultural heritage, public health, disaster risk management, pollution control, waste management, and biosecurity.

11. **Constitution of the Republic of Vanuatu.** The Constitution of the Republic of Vanuatu (1980) is the supreme law of the country and provides the overarching framework for environmental protection and sustainable resource management. It vests ownership of natural resources in the people and Government of Vanuatu and recognizes environmental protection as a national priority. The Constitution establishes the duty of every person to protect and safeguard the nation's wealth, natural resources, and environment for the benefit of present and future generations.

12. **Environmental Protection and Conservation Act.** The principal legislation governing environmental management in Vanuatu is the Environmental Protection and Conservation Act (EPCA) [CAP 283], as amended. The EPCA establishes the legal framework for environmental protection, conservation, and sustainable development and provides the basis for environmental assessment and permitting of development activities. The Act established the Department of Environmental Protection and Conservation (DEPC), which is responsible for environmental regulation and oversight. The DEPC operates under the Ministry of Climate Change Adaptation,

Meteorology, Geo-Hazards, Energy, Environment and Disaster Management (MOCC). The EPCA contains four principal components:

(i) Environmental administration and governance;
(ii) Environmental impact assessment and permitting;
(iii) Biodiversity conservation and protected areas management; and
(iv) Compliance, monitoring, and enforcement.

13. The Act also establishes the Biodiversity Advisory Council, that requires periodic State of the Environment reporting and provides for the maintenance of a public environmental registry.

14. **Environmental Impact Assessment Regulations.** The Environmental Impact Assessment (EIA) Regulations 2011, together with subsequent amendments, establish the procedures for environmental assessment and permitting under the EPCA. Project proponents are required to submit an application for an Environmental Permit to the DEPC. Following review, the DEPC undertakes a Preliminary Environmental Assessment (PEA) to determine whether:

(i) an Environmental Permit may be issued, with or without conditions; or
(ii) a full Environmental Impact Assessment (EIA) is required.

15. No physical work may commence until all required environmental approvals and permits have been obtained.

16. Where an EIA is required, the DEPC prepares Terms of Reference that address environmental, social, economic, and technical considerations. Public consultation forms an integral part of the assessment process, and an assessment panel may be established to review the findings and recommendations.

17. **EPCA Amendment Act 2019.** The Environmental Protection and Conservation (Amendment) Act 2019 strengthened the environmental permitting framework by clarifying provisions relating to permit applications, amendments, transfers, renewals, expiry, suspension, and cancellation of environmental permits. The amendments also refined key definitions and strengthened the regulatory powers of the Director of DEPC.

B. Other Relevant National Legislation

18. The following legislation may be applicable depending on the nature and location of Project activities:

(i) **Disaster Risk Management Act 2019.** The Disaster Risk Management Act 2019 establishes the institutional framework for disaster risk reduction, preparedness, response, and recovery. The Act designates the National Disaster Management Office (NDMO) as the lead agency for disaster management coordination and supports a shift from reactive disaster response toward proactive risk reduction and resilience building.
(ii) **Physical Planning Act.** The Physical Planning Act provides the framework for land-use planning and development control within designated Physical Planning Areas. Development activities within declared planning areas require compliance with applicable planning and building requirements.

19. Land Legislation. Land administration and tenure are governed principally by:

(i) Land Reform Act;
(ii) Land Leases Act; and
(iii) Custom Land Management Act.

20. These laws regulate land ownership, leasing, customary land rights, and land administration processes that may be relevant to Project activities.

21. **Pollution Control Act 2013.** The Pollution Control Act 2013 establishes requirements for pollution prevention and control. The Act incorporates the precautionary principle and requires consideration of climate change adaptation and mitigation in decision-making. The Act is administered by the DEPC.

22. **Waste Management Act 2014 and Regulations 2018.** The Waste Management Act and associated Regulations establish requirements for waste minimization, collection, transportation, treatment, disposal, and hazardous waste management. The legislation also regulates waste service providers and includes restrictions on selected single-use plastic products.

23. **Foreshore Development Act.** The Foreshore Development Act regulates activities and developments within foreshore areas. Development proposals require approval from the Minister responsible and consultation with, and consent from, customary landowners where applicable. The Act seeks to ensure that foreshore developments do not adversely affect coastal and marine environments.

24. **Biosecurity Legislation.** Biosecurity requirements are governed by the Plant Protection Act and associated Regulations, and the Animal Importation and Quarantine Act and Regulations. These laws provide measures to prevent the introduction and spread of invasive species, pests, and diseases.

25. Construction and Worker Safety Legislation. Civil works activities may also be subject to:
- (i) Health and Safety at Work Act;
- (ii) Labour Act;
- (iii) Quarry Act; and
- (iv) Other applicable regulations governing construction activities, occupational health and safety, and worker welfare.

C. International Agreements

26. Vanuatu is a party to numerous international and regional environmental agreements relating to biodiversity conservation, climate change, protection of natural resources, pollution control, and sustainable development. Relevant multilateral environmental agreements ratified by Vanuatu are listed in Annex 2 and should be considered during Project implementation, where applicable.

D. ADB Environmental and Social Framework Requirements

27. **Environmental and Social Management Framework.** Given the emergency nature of the Project, detailed environmental and social assessments and management plans for individual activities may not be available prior to project approval. Consistent with the ADB ESF, this ESMF establishes the procedures, principles, and requirements for identifying, assessing, managing, and monitoring environmental and social risks and impacts during Project implementation.

28. **ADB ESF.** The objective of the ADB ESF is to ensure that ADB-financed projects achieve development outcomes in a manner that is environmentally sustainable, socially inclusive, climate

resilient, and protective of affected people and communities. The ESF comprises ten Environmental and Social Standards (ESSs):

(i) ESS1: Assessment and Management of Environmental and Social Risks and Impacts;
(ii) ESS2: Labor and Working Conditions;
(iii) ESS3: Resource Conservation and Pollution Prevention;
(iv) ESS4: Community Health, Safety and Security;
(v) ESS5: Land Acquisition and Land Use Restrictions;
(vi) ESS6: Biodiversity Conservation and Sustainable Natural Resources Management;
(vii) ESS7: Indigenous Peoples;
(viii) ESS8: Cultural Heritage;
(ix) ESS9: Climate Change; and
(x) ESS10: Stakeholder Engagement and Information Disclosure.

29. **Environmental and Social Risk Classification.** ADB applies a risk-based approach to environmental and social management. Projects and activities are screened and classified according to the significance of their potential environmental and social risks and impacts. The risk classifications are:

(i) **High risk.** Activities likely to generate significant, diverse, irreversible, or unprecedented environmental and/or social impacts.
(ii) **Substantial risk.** Activities with potentially significant risks and impacts that are generally less complex, more predictable, and more readily mitigated than High Risk activities.
(iii) **Moderate risk.** Activities with limited adverse impacts that are site-specific, largely reversible, and capable of being addressed through readily available mitigation measures.
(iv) **Low risk.** Activities with minimal or negligible adverse environmental and social risks and impacts.

30. The environmental and social due diligence process includes screening, risk classification, stakeholder engagement, environmental and social assessment, preparation of management measures, monitoring, and reporting. Due diligence seeks to ensure that:

(i) environmental and social risks and impacts are adequately identified and assessed;
(ii) measures to avoid, minimize, mitigate, or compensate for adverse impacts are incorporated into project design and implementation;
(iii) borrowers have the commitment and capacity to manage environmental and social risks effectively;
(iv) responsibilities of contractors and other third parties are clearly defined; and
(v) meaningful consultation and information disclosure are undertaken throughout the project cycle.

31. **Gap Assessment and Application of the ESF.** ADB will assess the extent to which Vanuatu's legal and regulatory framework is consistent with the requirements of the ESF and evaluate the capacity of implementing agencies to manage environmental and social risks and impacts. Where gaps are identified between national requirements and ESF, or where institutional capacity requires strengthening, this ESMF establishes supplementary measures, procedures, and capacity-building actions to ensure that Project activities comply with ADB requirements and achieve the objectives of the ESF.

E. Institutional Capacity Assessment

32. The Ministry of Finance and Economic Management (MFEM) will serve as the Executing Agency (EA) and lead Implementing Agency (IA) for the Project.

33. Day-to-day environmental and social management will be coordinated through the Vanuatu Project Management Unit (VPMU), supported by qualified environmental and social specialists with experience in the implementation of ADB-financed projects and application of environmental and social risk management requirements.

34. Relevant government agencies, including the DEPC, NDMO, and sector ministries, will provide technical oversight and regulatory approvals within their respective mandates.

35. Although government agencies have prior experience implementing development partner-funded projects, emergency response operations often require accelerated planning, procurement, and implementation arrangements. To address these challenges, this ESMF establishes environmental and social screening procedures, management requirements, templates, monitoring arrangements, and capacity-building measures to support timely and effective management of environmental and social risks and impacts throughout Project implementation.

III. ANTICIPATED ENVIRONMENTAL AND SOCIAL IMPACTS

36. The activities under the RRCP are primarily focused on the provision of emergency assistance, restoration of essential services, and urgent rehabilitation of critical infrastructure necessary to protect life, health, and livelihoods.

37. Given the nature of the eligible expenditures, most Project activities are expected to generate positive environmental and social outcomes by supporting affected communities, restoring access to basic services, reducing vulnerability, and facilitating rapid recovery. Most activities are expected to have limited, temporary, site-specific, and reversible environmental and social risks and impacts.

38. Potential risks and impacts will vary depending on the nature, scale, and location of activities. Environmental and social screening will therefore be undertaken prior to implementation of any activity to identify applicable ESSs, determine risk levels, and establish appropriate mitigation measures consistent with this ESMF.

39. No activities involving significant adverse environmental or social impacts, involuntary land acquisition or land use restriction, significant impacts on biodiversity or critical habitats, or activities classified as High or Substantial Risks under the ADB's ESF will be eligible for financing under the Project.

40. Table 1: Positive List of Eligible Expenditure presents the Positive List of eligible expenditures from which the Government will select the activities and items to be financed under the RRCP as outlined in the Emergency Action Plan. Only activities included in this list will be eligible when a crisis occurs and the RRCP is activated.

Table 1: Positive List of Eligible Expenditures

Category	2. Eligible Items / Activities
Emergency livelihood support	• Direct financial assistance to essential service providers • Targeted cash transfers to vulnerable households, affected workers, or operators of micro- and small enterprises whose primary source of income is materially disrupted by the eligible crisis • Cash-for-work or similar programs to support debris clearance, clean-up, and other emergency response and early recovery activities
Emergency supplies and equipment	• Food, root crops, drinking water, hygiene supplies, blankets, tents/shelters, cookware, household kits, agricultural inputs and materials (e.g., seeds, livestock feed), veterinary medicines and supplies. • Pharmaceuticals, medicines, medical supplies and equipment, personal protective equipment, vaccines and cold-chain supplies, first aid kits, vector control supplies. • Equipment, temporary facilities, and backup power generation to ensure continuity of public essential services • Procurement and/or rental of vehicles, fuel, light equipment (e.g., water pumps, shovels) and heavy equipment (e.g., bulldozers, dump trucks)
Emergency repairs and rehabilitation [a]	• Debris clearance and restoration of access • Repair of damaged schools, health facilities, and emergency shelters • Temporary works or small-scale rehabilitation works to restore essential service delivery (e.g., local roads, bridges, jetties, water, sanitation, and energy systems)

6. [a] These expenditures will be subject to further E&S screening and due diligence and should be limited to interventions that can be implemented and disbursed within the 12-month activation period.

7. Source: ADB.

41. Based on the eligible activities identified, a preliminary assessment of potential environmental and social (E&S) risks and impacts was conducted across three project phases: (i) pre-implementation, (ii) implementation, and (iii) post-implementation.

Table 2: Anticipated Environmental and Social Impacts

Eligible Expenditure	Anticipated Potential E&S Risks and Impacts
1. Emergency livelihood support	
• Direct financial assistance to essential service providers • Targeted cash transfers to vulnerable households, affected workers, or operators of micro- and small enterprises whose primary source of income is materially disrupted by the eligible crisis • Cash-for-work or similar programs to support debris clearance, clean-up, and other emergency response and early recovery activities	1.1. Beneficiary identification or eligibility criteria may exclude vulnerable groups, including women, persons with disabilities, Indigenous Peoples, elderly persons, informal workers, and remote communities. Beneficiary registration systems may not adequately capture disadvantaged or vulnerable groups 1.2. Limited information disclosure and consultation with affected communities may result in misunderstanding of eligibility criteria, benefit levels, application procedures, and grievance channels, leading to mistrust, complaints, or social tensions 1.3. Beneficiary registration, verification, and outreach processes may create opportunities for sexual exploitation, abuse and harassment (SEAH), coercion, favoritism, or requests for informal payments in exchange for inclusion in assistance programs. 1.4. Occupational and community health and safety risks for project workers and recipients during in-person distribution of financial assistance

Eligible Expenditure	Anticipated Potential E&S Risks and Impacts
	1.5. Security risks associated with criminality, theft and violence targeting cash transfer and relief distribution facilities, potential crowding, stampede or panic during distribution
2. Emergency supplies and equipment	
• Food, root crops, drinking water, hygiene supplies, blankets, tents/shelters, cookware, household kits, agricultural inputs and materials (e.g., seeds, livestock feed), veterinary medicines and supplies. • Pharmaceuticals, medicines, medical supplies and equipment, personal protective equipment, vaccines and cold-chain supplies, first aid kits, vector control supplies.	2.1 Inadequate assessment of affected populations may result in procurement of inappropriate supplies, insufficient quantities, or exclusion of vulnerable groups such as women, elderly persons, persons with disabilities, Indigenous Peoples, remote communities, and displaced populations. 2.2 Limited consultation and communication regarding eligibility criteria, prioritization of assistance, distribution arrangements, and grievance processes may create misunderstandings, community dissatisfaction, or disputes. 2.3 Procurement of agricultural inputs, veterinary medicines, pesticides, fuel, generators, batteries, or medical products without adequate screening may introduce risks associated with hazardous substances, waste generation, pollution, and improper disposal requirements. 2.4 Pharmaceuticals, vaccines, chemicals, vector-control supplies, veterinary medicines, fuel, lubricants, and backup power systems may require specialized storage, handling, transport, and disposal arrangements. Failure to plan for these requirements may increase risks of spills, contamination, or accidental exposure. 2.5 Improper management of vaccines, medical supplies, and veterinary products may result in spoilage, expiration, and accumulation of hazardous or infectious waste requiring specialized handling and disposal. 2.6 Workers engaged in procurement, warehousing, transportation planning, inventory management, cold-chain preparation, or emergency logistics may not have adequate training, OHS procedures, or clear terms and conditions of employment. 2.7 Occupational health and safety risks during in-person distribution 2.8 Community health and safety risks
• Equipment, temporary facilities, and backup power generation to ensure continuity of public essential services • Procurement and/or rental of vehicles, fuel, light equipment (e.g., water pumps, shovels) and heavy equipment (e.g., bulldozers, dump trucks)	2.9 Workers engaged in procurement, transportation and equipment installation may not have adequate training, OHS procedures, or clear terms and conditions of employment 2.10 Insufficient sanitation facilities in temporary facilities may result in health, hygiene, and safety risks for project workers and nearby communities. 2.11 Inadequate restoration of temporary facility sites may leave residual environmental impacts, safety hazards, or restrictions on community use of affected areas 2.12 Inadequate management of equipment and heavy machinery following disaster response activities, including removal, storage, maintenance, repurposing, or disposal, may result in occupational and community health and safety risks

Eligible Expenditure	Anticipated Potential E&S Risks and Impacts
	2.13 Temporary restrictions on land use access, to land, assets, and reduced access to resources for siting of temporary facilities. • Loss of residences, and / or to livelihood sources • Loss of access to communal resources and utilities, including water, electricity, health systems, and security personnel 2.14 Generation and disposal of hazardous/non-hazardous waste/materials in temporary facilities
3 Emergency repairs and rehabilitation	
• Debris clearance and restoration of access	3.1 Debris generated by disasters may contain hazardous materials such as asbestos-containing materials, lead-based paint, fuels, chemicals, medical waste, damaged electrical equipment, or contaminated sediments. 3.2 Occupational health and safety risks 3.3 Temporary or permanent land use restrictions may arise where no adequate disposal site is available for debris/wastes generated during clearing operations.
• Repair of damaged schools, health facilities, and emergency shelters • Temporary works or small-scale rehabilitation works to restore essential service delivery (e.g., local roads, bridges, jetties, water, sanitation, and energy systems)	3.4 Inadequate environmental screening may fail to identify environmentally sensitive areas, protected habitats, critical ecosystems, cultural heritage resources, or existing contamination at proposed repair and rehabilitation sites. 3.5 Damage assessments may overlook structural instability of schools, health facilities, bridges, jetties, water systems, or other public infrastructure, creating risks for assessment teams, workers, and nearby communities during subsequent rehabilitation 3.6 Risk of poor working conditions due to the aftermath of emergency or disaster 3.7 Occupational health and safety risks, including exposure to construction related hazards during repairs such as: • **Falls and physical injuries:** Injuries or fatalities from falls from heights, slips, trips, and unstable surfaces. • **Struck-by and caught-in incidents:** Workers hit by moving equipment or falling objects, or trapped between materials or machinery. • **Electrocution risks:** Contact with live wires, faulty equipment, or overhead power lines leading to serious injury or death. • **Exposure to hazardous substances:** Dust, chemicals, asbestos, and fumes causing respiratory or long-term health effects. • **Manual handling and ergonomic stress:** Musculoskeletal injuries from heavy lifting, repetitive tasks, and poor posture. • **Noise, vibration, and heat exposure:** Hearing loss, fatigue, and heat-related illnesses from prolonged exposure. • **Fire and explosion hazards:** Risks from flammable materials, equipment, and electrical faults.

Eligible Expenditure	Anticipated Potential E&S Risks and Impacts
	• **Site security risks:** Unauthorized access, unsafe interactions with machinery, and accidents involving visitors or the public 3.8 Temporary restrictions on land use, access to land, assets, and livelihood sources for siting of emergency shelters. 3.9 Loss of access during rehabilitation/repair works 3.10 Temporary disturbances in communities associated with repair and rehabilitation works, including impacts on livelihood due to environmentally induced nuisances (e.g., dusts, noise) 3.11 Traffic and access disruptions 3.12 Localized impacts on natural resources and ecosystems 3.13 Inadequate restoration of temporary shelter sites, rehabilitation/repair work sites may leave residual environmental impacts, safety hazards, or restrictions on community use of affected areas.

A. Project-specific Contextual Risks

42. The rapid turnaround required in emergency situations may lead to:
   (i) Inadequate stakeholder identification, assessment, and engagement. Key stakeholders, especially vulnerable groups, may be excluded, leading to unaddressed concerns and inequitable outcomes;
   (ii) Insufficient or delayed information disclosure. Lack of timely, clear, and accessible information can result in misinformation, distrust, low project acceptance, and social resistance/conflict;
   (iii) Weak or absence of meaningful consultation. Limited or one-way engagement may prevent stakeholder views from influencing project design, increasing social risks;
   (iv) Gaps in grievance mechanism. Absence or poor functioning of grievance mechanism can leave complaints unresolved, escalating conflicts and reputational risks;
   (v) Exclusion of vulnerable and disadvantaged groups. Failure to tailor engagement approaches can result in unequal participation and benefit-sharing, or even exclusion of the disadvantaged and vulnerable groups.

B. SEAH Risk Assessment

43. In the context of emergency response and post-disaster recovery, the risk of sexual exploitation, abuse, and harassment (SEAH) is significantly elevated due to a combination of operational, social, and environmental factors:

1. Disrupted Social and Institutional Systems

Post-disaster conditions often weaken formal protection systems, law enforcement, and community governance structures. This reduces oversight and accountability, increasing the likelihood that inappropriate behavior by project workers may go undetected or unreported.

2. Heightened Power Imbalances

Project workers, particularly those involved in relief distribution, beneficiary identification, site supervision, or cash-for-work implementation, may hold decision-making power over access to employment, aid, or services. This creates a risk of SEAH, including exploitation in exchange for goods, services, or preferential treatment.

3. **Increased Vulnerability of Affected Populations**

Displaced persons, households that have lost livelihoods, women-headed households, persons with disabilities, and other vulnerable groups may be more susceptible to exploitation due to economic dependency, limited access to support systems, and urgent survival needs.

4. **Nature of Emergency and Early Recovery Activities**

Activities such as relief distribution, temporary shelter support, debris clearance, rehabilitation works, and community-based programs often require close and frequent interaction between workers and community members. These interactions may occur in uncontrolled or poorly supervised environments, increasing exposure to SEAH risks.

5. **Informal and Rapid Labor Mobilization**

Emergency implementation may involve rapid recruitment of workers, including contractors and community labor, sometimes with limited screening, training, or supervision. This can increase the likelihood of employing individuals without adequate awareness of acceptable conduct or SEAH standards.

6. **Limited Awareness and Reporting Mechanisms**

Affected communities may have limited awareness of their rights, expected standards of behavior, or available reporting channels. Social stigma, fear of retaliation, or mistrust in complaint systems can further discourage reporting of SEAH incidents.

7. **Weak Monitoring and Oversight in Emergency Contexts**

Time pressures, access constraints, and logistical challenges may limit the ability of the MFEM to conduct regular supervision, increasing the risk that incidents of SEAH are not prevented, detected, or addressed promptly.

8. **Risks in Community-Based and Cash-for-Work Activities**

Cash-for-work and community labor programs may introduce risks of harassment, exploitation, or abuse in worker selection, wage payment, supervision, or task allocation, particularly where transparency and grievance mechanisms are not robust.

The SEAH risk in this context is **context-driven and operationally induced**, arising from:

- frequent worker–community interactions;
- dependency relationships linked to aid and employment;
- weakened institutional safeguards; and
- accelerated implementation arrangements under emergency conditions.

Key Exposure Pathways

- Relief goods distribution and beneficiary targeting
- Worker recruitment and selection processes (including for cash-for-work)
- Supervision of worksites and community activities
- Informal interactions at worksites, temporary settlements, and distribution points
- Logistical and transport arrangements involving project workers

C. Risks and Impact Characterization

44. The initially identified environmental and social (E&S) risks and impacts associated with eligible expenditures are assessed below in relation to eligible events (e.g., disasters) that may trigger such impacts, taking into account their type, magnitude, duration, scale, and likelihood, to ensure that mitigation measures are proportionate. For this preliminary assessment, the following qualitative impact characterization is applied:

Impact Characteristic	Definition	Possible Designated Values
Type	A determination of whether the E&S risks and impacts occur as a result of the interaction between Project activities and project affected persons	• Direct • Indirect
Scope	Describes the extent of impact (e.g., confined to a small area around the project area, projected for several kilometers)	• Site specific/confined to a small area (low) • Localized/around project area (moderate) • Inter-island/ national (substantial/high)
Duration	The time period over which E&S risks and impacts are expected to occur.	• Temporary (Short-term) • Temporary (Long-term) • Permanent/Irreversible
Likelihood	Probability of an identified potential E&S risks and impacts to occur	• Unlikely (Low) • Minimal probability (moderate) • Likely (Substantial) • Most likely (High)
Magnitude	Describes the intensity of E&S risks and impacts as a result of the project activities	• Low or negligible; • Moderate • Substantial • High
*Note: For this specific assessment, **magnitude** is defined as essentially a function of scope and duration*. **Low or negligible** is one where people/community will not be affected in any way by a particular activity or the predicted effect is deemed to be 'imperceptible' or is indistinguishable from natural background variations; **Moderate** is one where people/community will experience a noticeable effect, but the impact magnitude is sufficiently small and/or low importance.		

Impact Characteristic	Definition	Possible Designated Values
Substantial has an impact magnitude that is within applicable standards up to a level that might be just short of breaching the manageable limit. The emphasis for substantial impacts is on demonstrating that the impact has been reduced to a level that is as low as reasonably practicable or that substantial impacts are being managed effectively and efficiently. **High** is one where unmanageable limit or standards may be exceeded. The aim is to get to a position where the Project's activities do not have any substantial or high risks/impacts.		

45. This E&S risks and impact characterization is designed to support rapid screening of environmental and social (E&S) risks and impacts during activation. It guides the identification of activities that may not be permitted by linking them to the relevant "eligible event" (e.g., disaster, pollution contamination, etc.), recognizing that risk levels vary depending on the triggering event. Impacts and eligible events highlighted in red signify potential substantial or high risk and will require full risk assessment to determine financing eligibility, as activities with potential substantial or high environmental and social risks are not eligible for financing under the project. These ratings do not automatically render an activity associated with a particular E&S impact ineligible; rather, they indicate the level of information and preparation required to ensure appropriate mitigation measures are in place prior to the onset of a disaster or emergency. This and other project level data that will become available during activation will inform the confirmation of E&S risk classification and the required E&S actions prior to the implementation of activities. All risk characterizations and ratings presented in the table below are indicative and may be adjusted based on actual conditions and circumstances encountered on the ground.

46. During the activation period, the indicative risks and impact characterizations will be reviewed against the specific activities proposed for financing and the conditions on the ground to determine whether the same impacts and risk characterizations remain applicable. Where differences are identified, the E&S Screening Matrix will reflect these changes and required mitigation measures

Table 3: E&S Risks and Impact Characterization

(Note: Ratings may be adjusted based on actual site conditions following an eligible event)

ANTICIPATED POTENTIAL IMPACTS	TRIGGER EVENTS[1]	TYPE	SCOPE	DURATION	LIKELIHOOD	MAGNITUDE
ESS1: Environmental and Social Risks and Impacts						
1. Beneficiary identification or eligibility criteria may exclude vulnerable groups, including women, persons with disabilities, Indigenous Peoples, elderly persons, informal workers, and remote communities. Beneficiary registration systems may not adequately capture disadvantaged or vulnerable groups	All disasters and emergencies	Indirect	Inter-island	Temporary (short-term)	Likely	Moderate
2. Localized impacts on natural resources and ecosystems during repairs, clearing operation and debris disposal	All disasters and emergencies	Direct	Site-specific	Temporary (short-term)	Likely	Moderate
3. Inadequate assessment of affected populations may result in procurement of inappropriate supplies, insufficient quantities, or exclusion of vulnerable groups such as women, elderly persons, persons with disabilities, Indigenous Peoples, remote communities, and displaced populations	All disasters and emergencies	Indirect	Inter-island	Temporary (short-term)	Minimal probability	Moderate
4. Improper sourcing of fill, gravel, or construction materials	All disasters and emergencies	Direct	Localized	Temporary (short-term)	Likely	Moderate
5. Temporary disturbances in communities associated with repair and rehabilitation works, including impacts on livelihood due to environmentally induced nuisances (e.g., dusts, noise)	Disasters triggered by natural hazards, pollution contamination	Direct	Localized	Temporary (short-term)	Likely	Moderate
6. Inadequate restoration of temporary facility/shelter sites, rehabilitation/repair work sites may leave residual environmental impacts, safety hazards, or restrictions on community use of affected areas	All disasters and emergencies	Direct	Site-specific	Temporary (short-term)	Minimal probability	Moderate
ESS2: Labor and Working Condition						
7. Risk of poor working condition due to the aftermath of disaster	Disasters triggered by natural hazards	Direct	Site-specific	Temporary (short-term)	Likely	Moderate

[1] Refers to eligible events where the E&S risks and impacts are anticipated to occur

ANTICIPATED POTENTIAL IMPACTS	TRIGGER EVENTS[1]	TYPE	SCOPE	DURATION	LIKELIHOOD	MAGNITUDE
8. Workers engaged in procurement, transportation and equipment installation may not have clear terms and conditions of employment	All disasters and emergencies	Indirect	Site-specific	Temporary (short-term)	Likely	Moderate
9. SEAH risks on project workers	All disasters and Emergencies	Indirect	Localized	Temporary (short-term)	Highly likely	High
10. Risk of child or forced labor due to financial pressure	Disasters and emergencies	Indirect	Inter-island	Temporary (short-term)	Minimal probability	Low
11. Lack of functioning worker's grievance mechanism	Disasters triggered by natural hazards	Indirect	Inter-island	Temporary (short-term)	Likely	Moderate
	Health/biological emergency	Indirect	Inter-island	Temporary (short-term)	Minimal probability	Moderate
	Food crisis, energy, agricultural pest, animal disease outbreak, pollution contamination	Indirect	Inter-island	Temporary (short-term)	Unlikely	Low
ESS3: Resource Conservation and Pollution Prevention						
12. Procurement of agricultural inputs, veterinary medicines, pesticides, fuel, generators, batteries, or medical products without adequate screening may introduce risks associated with hazardous substances, waste generation, pollution, and improper disposal requirements	All disasters and emergencies	Indirect	Site-specific	Temporary (short-term)	Minimal probability	Moderate
13. Improper management of vaccines, medical supplies, and veterinary products may result in spoilage, expiration, and accumulation of hazardous or infectious waste requiring specialized handling and disposal	All disasters and emergencies	Indirect	Site-specific	Temporary (short-term)	Minimal probability	Moderate
14. Inadequate environmental screening may fail to identify existing contamination at proposed repair and rehabilitation sites	All disasters and emergencies	Indirect	Site-specific	Temporary (short-term)	Likely	Moderate
15. Fuel spills, lubricant leaks, and equipment-related pollution	All disasters and emergencies	Direct	Site-specific	Temporary (short-term)	Minimal probability	Moderate

ANTICIPATED POTENTIAL IMPACTS	TRIGGER EVENTS[1]	TYPE	SCOPE	DURATION	LIKELIHOOD	MAGNITUDE
16. Generation and disposal of hazardous/non-hazardous/biohazard waste/materials in temporary facilities, or during debris clearing, etc.	Disasters triggered by natural hazards	Direct	Inter-island	Temporary (long-term)	Likely	Moderate
	Health/biological emergency, pollution contamination	Direct	Inter-island	Temporary (long-term)	Highly likely	Substantial
	Food crisis, energy, agricultural pest, animal disease outbreak	Indirect	Inter-island	Temporary (short-term)	Unlikely	Low
ESS4: Health, Safety and Security						
17. Pharmaceuticals, vaccines, chemicals, vector-control supplies, veterinary medicines, fuel, lubricants, and backup power systems may require specialized storage, handling, transport, and disposal arrangements. Failure to plan for these requirements may increase risks of spills, contamination, or accidental exposure	All disasters and emergencies	Indirect	Site-specific	Temporary (short-term)	Minimal probability	Moderate
18. Occupational and community health and safety risks for project workers and recipients during in-person distribution of financial assistance, food, drinking water, supplies, and medical supplies; and cash-for-work program beneficiaries	Disasters triggered by natural hazards	Direct	Inter-island	Temporary (short-term)	Likely	Moderate
	Health/biological emergency	Direct	Inter-island	Temporary (short-term)	Highly Likely	High
	Food crisis, energy, agricultural pest, animal disease outbreak, pollution contamination	Direct	Site-specific	Temporary (short-term)	Likely	Moderate
19. Handling and contamination risks: Food, medicine, or relief items becoming unsafe during storage, transit or distribution 8.	Disasters triggered by natural hazards	Indirect	Inter-island	Temporary (short-term)	Minimal probability	Moderate
	Health/biological emergency	Indirect	Inter-island	Temporary (short-term)	Highly likely	High
20. Security risks associated with criminality, theft and violence targeting cash transfer	All disasters and emergencies	Direct	Site-specific	Temporary (short-term)	Minimal probability	Moderate

ANTICIPATED POTENTIAL IMPACTS	TRIGGER EVENTS[1]	TYPE	SCOPE	DURATION	LIKELIHOOD	MAGNITUDE
and relief distribution facilities, potential crowding, stampede or panic during distribution.						
21. Risks of exposure to hazardous waste/materials in temporary facilities or during clearing operation and debris/hazardous waste disposal, etc.	Disasters triggered by natural hazards	Indirect	Localized	Temporary (short-term)	Likely	Moderate
	Health/biological emergency, pollution contamination	Direct	Inter-island	Temporary (short-term)	Highly likely	High
22. Workers engaged in procurement, transportation and equipment installation may not have adequate training, OHS procedures.	All disasters and emergencies	Direct	Site-specific	Temporary (short-term)	Minimal probability	Moderate
23. Exposure to construction related hazards during repairs.	Disasters triggered by natural hazards, pollution contamination	Direct	Site-specific	Temporary (short-term)	Likely	Moderate
24. Damage assessments may overlook structural instability of schools, health facilities, bridges, jetties, water systems, or other public infrastructure, creating risks for assessment teams, workers, and nearby communities during subsequent rehabilitation	All disasters and emergencies	Indirect	Site-specific	Temporary (short-term)	Likely	Moderate
25. SEAH risks to project workers and community (e.g., beneficiary registration, verification, and outreach processes may create opportunities for sexual exploitation, abuse and harassment (SEAH), coercion, favoritism, or requests for informal payments in exchange for inclusion in assistance programs)	All disasters and emergencies	Indirect	Site-specific	Temporary (short-term)	Likely	Moderate
26. Traffic and access disruptions due to project activities/works combined with potential road obstruction during the aftermath of a disaster	Disasters triggered by natural hazards	Direct	Localized	Temporary (short-term)	Likely	Moderate

ANTICIPATED POTENTIAL IMPACTS	TRIGGER EVENTS[1]	TYPE	SCOPE	DURATION	LIKELIHOOD	MAGNITUDE
27. Inadequate management of equipment and heavy machinery following disaster response activities, including removal, storage, maintenance, repurposing, or disposal, may result in occupational and community health and safety risks	All disasters and emergencies	Indirect	Site-specific	Temporary (short-term)	Minimal probability	Moderate
28. Insufficient sanitation facilities in temporary facilities/shelters may result in health, hygiene, and safety risks for project workers and communities	All disasters and emergencies	Direct	Site-specific	Temporary (short-term)	Likely	Substantial
ESS5: Land Acquisition and Land Use Restriction						
29. Temporary restrictions on land use and/or economic and physical displacement for siting of temporary facilities, emergency shelters	Disasters triggered by natural hazards, health/biological emergency, pollution contamination	Direct	Site-specific	Temporary (short-term)	TBD[2]	TBD[3]
30. Temporary or permanent land use restrictions may arise where debris clearance generates waste and no adequate disposal site is available	Disasters triggered by natural hazards	Indirect	Site-specific	Permanent	TBD[4]	TBD[3]
31. Loss of access during rehabilitation/repair works	All disasters and emergencies	Direct	Site-specific	Temporary (short-term)	Likely	Moderate
ESS6: Biodiversity Conservation and Sustainable Natural Resources Management						
32. Inadequate environmental screening may fail to identify environmentally sensitive areas, protected habitats, critical ecosystems at proposed repair and rehabilitation sites	All disasters and emergencies	Indirect	Site-specific	Temporary (short-term)	Likely	Moderate
33. Localized impacts on natural resources and ecosystems	All disasters and emergencies	Direct	Site-specific	Temporary (short-term)	Likely	Moderate
ESS7: Indigenous Peoples						
34. Inadequate assessment of affected populations may result in the failure to	All disasters and emergencies	Indirect	Site-specific	Temporary (short-term)	Minimal probability	Low

[2] Subject to assessment based on the location and sufficiency of identified sites for emergency shelter facilities/evacuation centers in the Emergency Response Plan
[3] To be determined based on the actual scale of the disaster or emergency and the number of affected persons
[4] Subject to assessment based on the availability of identified disposal sites in the Emergency Response Plan.

ANTICIPATED POTENTIAL IMPACTS	TRIGGER EVENTS[1]	TYPE	SCOPE	DURATION	LIKELIHOOD	MAGNITUDE
identify Indigenous Peoples present in or affected by the project, potentially leading to their exclusion from project planning, consultation, and benefit-sharing processes						
ESS8: Cultural Heritage						
35. Inadequate cultural heritage risk and impact screening may fail to identify cultural heritage resources (chance finds of cultural heritage resources) at proposed repair and rehabilitation sites, or temporary facility/shelter sites; or during debris clearing, which may then suffer damage as a result.	All disasters and emergencies	Indirect	Site-specific	Temporary (short-term)	Minimal probability	Low
ESS10: Stakeholder Engagement and Information Disclosure						
36. Exclusion of vulnerable and disadvantaged groups: Failure to tailor engagement approaches can result in unequal participation and benefit-sharing, or even exclusion of the disadvantaged and vulnerable groups	All disasters and emergencies	Indirect	Inter-island	Temporary (short-term)	Minimal probability	Moderate
37. Unequal access to information regarding support measures amongst disaster affected population due to limited communication channels and mobility in the aftermath of a disaster	Disasters triggered by natural hazards	Indirect	Inter-island	Temporary (short-term)	Highly likely	Substantial
	Health/biological emergency	Indirect	Inter-island	Temporary (short-term)	Likely	Moderate
38. Limited information disclosure and consultation with affected communities may result in misunderstanding of eligibility criteria, benefit levels, application procedures, and grievance channels, leading to mistrust, complaints, or social tensions	Food crisis, energy, agricultural pest, animal disease outbreak, pollution contamination	Indirect	Inter-island	Temporary (short-term)	Unlikely	Low
39. Absence or poor functioning of grievance mechanism due to limited communication channels and mobility in the aftermath of a disaster or emergency	Disasters triggered by natural hazards	Indirect	Inter-island	Temporary (short-term)	Likely	Substantial
	Health/biological emergency	Indirect	Inter-island	Temporary (short-term)	Minimal probability	Moderate

ANTICIPATED POTENTIAL IMPACTS	TRIGGER EVENTS[1]	TYPE	SCOPE	DURATION	LIKELIHOOD	MAGNITUDE
	Food crisis, energy, agricultural pest, animal disease outbreak, pollution contamination	Indirect	Inter-island	Temporary (short-term)	Unlikely	Low

IV. ENVIRONMENTAL AND SOCIAL ASSESSMENT FOR UNANTICIPATED IMPACTS

47. Given the contingent emergency response nature of the Project, the exact location, scale, timing, and scope of activities to be financed may not be known at the time of Project appraisal. While the eligible activities included in the positive list are expected to generate predominantly low to moderate environmental and social risks and impacts, unforeseen circumstances may result in unanticipated environmental and social risks during implementation.

48. This ESMF establishes procedures for identifying, assessing, managing, and monitoring any unanticipated environmental and social risks and impacts that may arise during implementation. The approach is consistent with the requirements of ADB's ESF, particularly ESS1: Assessment and Management of E&S Risks and Impacts, and applies the principles of adaptive management, proportionality, stakeholder engagement, and the mitigation hierarchy.

A. Screening and Assessment of Emergency Activities

49. Prior to financing any activity under the contingent emergency response component, the EA supported by the VPMU and relevant environmental and social specialists, will undertake environmental and social screening using the procedures and templates included in this ESMF. The screening process will:

(i) Confirm that the proposed activity falls within the approved positive list;
(ii) Identify applicable ESSs;
(iii) Determine the environmental and social risk classification;
(iv) Identify potential direct, indirect, and cumulative impacts;
(v) Assess potential impacts on vulnerable and disadvantaged groups;
(vi) Identify any land access, land use, livelihood, biodiversity, cultural heritage, labor, health and safety, or community risks;
(vii) Determine whether additional environmental and social assessments are required; and
(viii) Confirm compliance with the Project's exclusion list and eligibility criteria.

50. The level of assessment will be proportionate to the nature and scale of the identified risks and impacts.

B. Management of Unanticipated Risks and Impacts

51. Where unanticipated environmental or social risks or impacts are identified during implementation, the EA with support of the VPMU will take immediate steps to investigate, assess, and manage the issue in accordance with the mitigation hierarchy:

(i) Avoid impacts where feasible;
(ii) Minimize impacts that cannot be avoided;
(iii) Mitigate residual impacts through appropriate management measures; and
(iv) Compensate or offset residual impacts where required and feasible.
(v) Where necessary, additional environmental and social assessments may be undertaken to evaluate the significance of newly identified risks and determine appropriate corrective actions.

52. Some examples of unanticipated impacts may include:

(i) Discovery of previously unknown sensitive environmental receptors;
(ii) Unexpected impacts on community health and safety;
(iii) Unanticipated waste management or pollution issues;

(iv) Discovery of cultural heritage resources during emergency rehabilitation works;
(v) Unforeseen impacts on vulnerable households or customary land users;
(vi) Labor-related incidents, occupational injuries, or worker grievances including sexual exploitation abuse and harassment (SEAH) related incidents;
(vii) Supply chain risks associated with emergency procurement;
(viii) Security incidents associated with distribution of emergency assistance;
(ix) Emerging public health risks or disease outbreaks linked to Project activities.

53. Any identified impacts will be documented and managed through site-specific mitigation measures and corrective action plans, as appropriate.

C. Additional Environmental and Social Assessment

54. Where screening identifies risks or impacts that were not anticipated during Project preparation, the EA and the VPMU may prepare additional environmental and social assessments proportionate to the level of risk.

55. Depending on the nature of the impact, these assessments may include:
(i) Environmental and Social Management Plans (ESMPs);
(ii) Labor Management Procedures (LMPs);
(iii) Health and Safety Management Plans;
(iv) Waste Management Plans;
(v) Traffic Management Plans;
(vi) Community Health and Safety Plans;
(vii) Stakeholder Engagement Plans;
(viii) Land Access Agreement/Due Diligence Report[5]
(ix) Biodiversity Management Measures;
(x) Chance Finds Procedures; or
(xi) Corrective Action Plans.

56. All such assessments and management plans will be prepared, disclosed, implemented, and monitored in accordance with the requirements of the ESF and this ESMF.

D. Exclusion and Escalation Procedures

57. Activities that are determined during screening or implementation to involve adverse environmental or social risks and impacts beyond the scope of this ESMF will not be financed until appropriate assessments have been completed and ADB requirements have been met.

58. Activities will be excluded from financing where they are likely to be classified as High or Substantial Risk under the ADB ESF. Specifically, the following activities are excluded from the project:
(i) Included in ADB’s Prohibited Investment Activities List;
(ii) Procurement of goods and services through security forces (including but not limited to Vanuatu Police Force, Vanuatu Mobile Force, etc.)
(iii) Staff overtime payments for members of security forces (as per above).
(iv) Use of prison labor, child labor, or any forms of forced labor

[5] For activities with civil works, due diligence will be required to confirm the absence of land acquisition and land use restriction impacts.

(v) Sanitary and hazardous waste management
(vi) Construction, refurbishment, operation and maintenance of storage facilities
(vii) Activities involving involuntary land acquisition/land use restriction
(viii) Has the potential to affect Indigenous Peoples in a manner that would necessitate Free, Prior, and Informed Consent (FPIC).
(ix) Activities in protected and sensitive areas including riverbanks, key biodiversity areas, and critical habitat;
(x) Cause significant or irreversible impacts on biodiversity or ecosystem services;
(xi) Storage and distribution of medicine and veterinary medicine.
(xii) Direct operation of shelters, evacuation camps, storage facilities, including activities such as camp establishment, land agreements and compensation, and the provision of sanitation and waste management services.
(xiii) Activities in known national or internationally recognized cultural heritage sites.
(xiv) Procurement, storage or distribution of fuel.
(xv) Procurement, storage, or distribution of goods with hazardous substances such as chlorine, pesticides, etc.;
(xvi) Involve activities prohibited under national law or international conventions ratified by Vanuatu;
(xvii) Present unacceptable risks to communities, workers, or vulnerable groups.

59. Where screening identifies risks that exceed the assumptions of this ESMF, the activity will be referred to ADB for review and determination of additional assessment and approval requirements prior to assessment and implementation.

E. Assessment of Activities Included in the Positive List

60. The positive list of eligible activities comprises emergency livelihood support, procurement and distribution of essential goods, medical and health supplies, restoration of essential services, and urgent rehabilitation of life-critical services. These activities are expected to generate substantial social benefits and predominantly low to moderate environmental and social risks.

61. Nevertheless, all activities financed under the positive list will remain subject to environmental and social screening prior to implementation. The screening process will verify that no unanticipated environmental or social risks are present and that any identified impact can be effectively managed through the measures established in this ESMF and any required supplemental environmental and social instruments.

V. ENVIRONMENTAL AND SOCIAL MANAGEMENT MITIGATION MEASURES

62. This section establishes the environmental and social management measures that will be applied to all activities financed under the Project. The objective is to ensure that Project activities are implemented in a manner that avoids, minimizes, mitigates, and manages adverse environmental and social risks and impacts in accordance with the GoV's legal requirements and ADB's ESF.

63. Given the emergency response nature of the Project, environmental and social management measures have been designed to be practical, proportionate, and responsive to rapidly evolving circumstances while maintaining compliance with the applicable ESSs.

64. All Project activities will apply the mitigation hierarchy by:

(i) Avoiding adverse environmental and social impacts wherever feasible;
(ii) Minimizing impacts that cannot be avoided;
(iii) Mitigating residual impacts through appropriate management measures; and
(iv) Monitoring implementation and adopting corrective actions where necessary.

65. Environmental and social screening will be undertaken prior to implementation of all activities to identify risks, determine applicable ESS requirements, and confirm the necessary mitigation measures.

A. Environmental and Social Risk Management Process

66. Environmental and social management under the Project will follow the process outlined below:

(i) **Step 1 – Activity Identification.** Eligible emergency response activities are identified by the Government in response to a declared emergency or eligible crisis event.
(ii) **Step 2 – Environmental and Social Screening.** The proposed activity is screened using the procedures established in this ESMF to identify risks, applicable ESS requirements, and any required mitigation measures.
(iii) **Step 3 – Approval and Documentation.** Screening outcomes are reviewed by the MFEM, VPMU and relevant authorities. Any required environmental and social instruments are prepared and approved prior to implementation.
(iv) **Step 4 – Implementation.** MFEM and VPMU will be responsible for implementing the environmental and social mitigation measures and ensuring that these requirements are communicated and cascaded to all relevant implementing partners, contractor, supplier, or service provider.
(v) **Step 5 – Monitoring and Reporting.** Environmental and social performance is monitored throughout implementation, including compliance with mitigation measures, stakeholder engagement activities, grievance management, and incident reporting.
(vi) **Step 6 – Corrective Action and Adaptive Management.** Where non-compliance, incidents, or unforeseen impacts are identified, corrective actions are implemented and monitored until satisfactory resolution is achieved.

B. General Environmental and Social Management Measures

67. The following measures shall apply to all Project activities:

68. **Environmental and Social Screening.** All proposed activities shall be screened before implementation to

(i) confirm eligibility under the approved positive list;
(ii) verify compliance with the Project exclusion list;
(iii) identify applicable environmental and social risks and impacts;
(iv) determine the applicable Environmental and Social Standards;
(v) assess risks to vulnerable and disadvantaged groups;
(vi) identify required mitigation measures and management instruments; and
(vii) determine reporting and monitoring requirements.

69. Activities identified as presenting significant adverse environmental or social risks beyond the scope of this ESMF shall not proceed until additional assessment and approval requirements have been completed.

70. **Stakeholder Engagement and Information Disclosure.** Project information shall be disclosed in a timely, accessible, and culturally appropriate manner. Stakeholder engagement activities shall:

(i) Inform affected communities and beneficiaries of Project activities;
(ii) Provide opportunities for consultation and feedback;
(iii) Ensure participation of women, persons with disabilities, elderly persons, youth, and other vulnerable groups;
(iv) Respect customary decision-making structures and local governance arrangements; and
(v) Maintain records of consultations and concerns raised.

71. **Incident and Accident Management.** Significant environmental, social, health, safety, security, or labor-related incidents shall be reported promptly to the EA and ADB in accordance with Project reporting procedures. Corrective actions should be implemented to prevent recurrence.

72. Table 4 presents the Activity-Specific Environmental and Social Management Measures. The environmental and social risks and mitigation measures presented therein are indicative and are not intended to be exhaustive. All proposed activities should be screened and assessed against these risks, taking into consideration their specific context, scale, location, and implementation arrangements. Where additional risks and impacts are identified, appropriate mitigation measures should be developed and documented in the relevant environmental and social instruments, consistent with the requirements of this ESMF and applicable environmental and social standards.

Table 4: Activity-Specific Environmental and Social Management Measures

Eligible Items/Activities	Potential Risks	Mitigation Measures
A. Emergency livelihood support		
• Direct financial assistance to essential service providers • Targeted cash transfers to vulnerable households, affected workers, or operators of micro- and small enterprises whose primary source of income is materially disrupted by the eligible crisis • Cash-for-work or similar programs to support debris clearance, clean-up, and other emergency response and early recovery activities	• Exclusion of vulnerable households from assistance • Errors in beneficiary identification	• Utilize existing government social protection systems and verified beneficiary databases where available; • Apply transparent eligibility criteria and beneficiary selection procedures; • Ensure equitable access for women, persons with disabilities, elderly persons, remote communities, and other vulnerable groups;
	• Fraud, misuse, or inequitable distribution of benefits	• Publicly communicate eligibility requirements and distribution arrangements;
	• Community dissatisfaction and grievances	• Maintain accessible grievance channels; • Monitor distribution outcomes and beneficiary satisfaction.
	• Limited information disclosure and consultation	• Conduct annual preliminary stakeholder consultation prior to onset of any disaster/emergency. • Develop and disseminate project information materials, including emergency contact numbers and grievance contact details, through community notice boards, project websites, and brochures, prior to onset of any disaster/emergency.
	• Occupational and community health and safety risks for project workers and recipients during in-person distribution of financial assistance • Security risks associated with criminality, theft and violence targeting cash transfer and relief distribution facilities, potential crowding, stampede or panic during distribution	• Implement site-specific hazard assessments, enforce PPE requirements, adequate physical distancing, and site security to ensure safe and orderly operations, prior to any in-person activity. • See attached HSMF
B. Emergency supplies and equipment		

Eligible Items/Activities	Potential Risks	Mitigation Measures
Food, root crops, drinking water, hygiene supplies, blankets, tents/shelters, cookware, household kits, agricultural inputs and materials (e.g., seeds, livestock feed), veterinary medicines and supplies.	• procurement of inappropriate supplies, insufficient quantities • Limited consultation and communication • Procurement without adequate screening may introduce risks associated with hazardous substances • Improper storage of food, water, fuel, agricultural inputs, or veterinary supplies; • Generation of packaging and solid waste; • Fuel spills and contamination; • Occupational and community health and safety risks during transportation and distribution.	• Conduct rapid needs assessment and consultation with community representative • Verify affected population • Establish an emergency help desk or grievance mechanism with reliable communication systems, disseminate contact details • Assign community focal persons for disaster response communications. • Procure goods from authorized suppliers where feasible; • Store goods in secure and suitable facilities; • Ensure proper labeling and handling of hazardous materials; • Implement spill prevention and response procedures for fuel and chemicals; • Dispose of packaging and waste through approved waste management systems; • Apply traffic and logistics management measures during distribution; • Implement site-specific hazard assessments, enforce PPE requirements, adequate physical distancing, and site security to ensure safe and orderly operations, prior to any in-person activity. • See attached HSMF.
Pharmaceuticals, medicines, medical supplies and equipment, personal protective equipment, vaccines and cold-chain supplies, first aid kits, vector control supplies.	• Pharmaceuticals, vaccines, chemicals, vector-control supplies, veterinary medicines, fuel, lubricants, and backup power systems may require specialized storage, handling, transport, and disposal arrangements • Improper storage of medicines and vaccines;	• No procurement will be financed unless adequate storage and handling arrangements are in place. • Pharmaceuticals and similar products will be managed only by trained personnel to minimize the risk of spills, contamination, spoilage, and accidental exposure. • Follow national health regulations and relevant international good practice; • Maintain cold-chain requirements for vaccines and temperature-sensitive supplies; • Store medicines and medical supplies in secure facilities;

Eligible Items/Activities	Potential Risks	Mitigation Measures
	• Generation of medical and hazardous waste; • Occupational exposure to infectious materials; • Medical supplies, and veterinary products may result in spoilage, expiration, and accumulation of hazardous or infectious waste requiring specialized handling and disposal • Community health risks from improper disposal of healthcare waste. • Workers engaged in procurement, warehousing, transportation planning, inventory management, cold-chain preparation, or emergency logistics may not have adequate training, OHS procedures, or clear terms and conditions of employment • Community and Occupational and health and safety	• Segregate, collect, transport, and dispose of healthcare waste safely; • Train personnel in infection prevention and control procedures • Develop and implement site-specific protocols for managing unexpected cases of product spoilage, expiration, and the generation of hazardous or infectious waste, including safe handling, storage, transportation, and disposal. • Pre-identify suitable health care and biohazard waste disposal facilities and establish protocols for the safe handling, storage, transport, treatment, and disposal of such wastes . • Identify and provide advance training to health workers, project workers, emergency responders, volunteers, and community workers on occupational health and safety (OHS) procedures • establish a clear term of reference for all health workers, emergency responders, volunteers and community workers • Implement site-specific hazard assessments, enforce PPE requirements, physical distancing, perimeter controls, and maintain adequate security arrangements to ensure safe and orderly operations, prior to any in-person activity. • Implement and operationalize attached LMP and HSMF
• Equipment, temporary facilities, and backup	• Fuel spills and pollution from generators;	• Locate temporary facilities away from sensitive receptors where feasible;

Eligible Items/Activities	Potential Risks	Mitigation Measures
power generation to ensure continuity of public essential services. • Procurement and/or rental of vehicles, fuel, light equipment (e.g., water pumps, shovels) and heavy equipment (e.g., bulldozers, dump trucks)	• Noise and air emissions from temporary power systems; • Community health and safety risks during installation and operation. • Workers engaged in procurement, transportation and equipment installation may not have adequate training, OHS procedures, or clear terms and conditions of employment • Insufficient sanitation facilities in temporary facilities may result in health, hygiene, and safety risks for project workers and nearby communities • Inadequate restoration of temporary facility sites may leave residual environmental impacts, safety hazards, or restrictions on community use of affected areas	• Implement fuel storage and spill containment measures; • Maintain generators and equipment in accordance with manufacturer's requirements; • Restrict public access to hazardous work areas; • Provide public notification regarding temporary service disruptions. • Identify and provide advance training to health workers, project workers, emergency responders, volunteers, and community workers on occupational health and safety (OHS) procedures • establish a clear term of reference for all health workers, emergency responders, volunteers and community workers • Provide and maintain adequate, accessible, and gender-responsive sanitation, hygiene, and waste management facilities commensurate with the expected number of users, and conduct regular inspections to ensure their continued functionality and cleanliness. • Prepare and implement a site restoration and decommissioning plan to restore temporary facility sites to their pre-project condition or an agreed post-use condition. • Remove all temporary structures, equipment, waste, and hazardous materials upon completion of activities and dispose of them in accordance with applicable requirements. • Conduct site inspections prior to demobilization to identify and address residual environmental impacts, safety hazards, and access restrictions. • Rehabilitate disturbed areas, including reinstatement of drainage, vegetation, utilities, and community infrastructure, as applicable. • Consult stakeholders and local authorities to confirm that sites are safe, accessible, and suitable for their intended use following restoration.

Eligible Items/Activities	Potential Risks	Mitigation Measures
	• Temporary restrictions on land use access, to land, assets, and reduced access to resources for siting of temporary facilities	• Document site restoration activities and obtain confirmation of satisfactory site handover from the relevant authorities. • No involuntary land acquisition will be undertaken. Temporary facilities will be sited on available government-owned land or properties that are free from physical, structural, environmental, and other safety hazards.
C. Emergency repairs and rehabilitation		
Quick-disbursing rehabilitation limited to restoring essential service delivery (e.g., Debris clearance, restoration or temporary patching of access routes for emergency vehicles).	• Debris generated by disasters may contain hazardous materials such as asbestos-containing materials, lead-based paint, fuels, chemicals, medical waste, damaged electrical equipment, or contaminated sediments • Occupational health and safety risks	• Conduct debris assessments and screening to identify hazardous materials, including asbestos-containing materials, lead-based paint, fuels, chemicals, medical waste, damaged electrical equipment, and contaminated sediments, prior to debris handling and disposal. • Segregate hazardous and non-hazardous debris at source and manage hazardous materials in accordance with applicable national regulations and good international industry practice. • Provide workers with appropriate PPE, training, and handling procedures for hazardous materials and contaminated debris. • Store, transport, treat, and dispose of hazardous debris only through authorized facilities and licensed service providers. • Establish procedures/protocols for spill prevention and response, contamination control, and emergency management during debris clearance and disposal activities.
	• Temporary or permanent land use restrictions may arise in the use of machinery to clear of debris from public or private land, and where no adequate disposal site is available for debris/wastes generated during clearing operations	• Identify and pre-approve suitable debris disposal, recycling, recovery, and temporary disposal sites before clearing activities commence, giving preference to existing authorized facilities. • Screen proposed disposal and temporary storage sites to avoid impacts on residential areas, productive land, environmentally sensitive areas, cultural heritage resources, and existing land users. • Prioritize debris reduction, segregation, recycling, reuse, and recovery to minimize the volume of waste requiring disposal. • Avoid involuntary land acquisition and land use restrictions by utilizing available government-owned land or existing authorized waste management facilities wherever feasible. Where not feasible, voluntary arrangement for land use may be considered by establishing land use agreement or similar instruments, for access to

Eligible Items/Activities	Potential Risks	Mitigation Measures
	• Dust emissions from excavation and vehicle movements • Traffic disruption and restricted access for local communities	clear debris, under the condition that no livelihoods will be affected. Compensatory measures in accordance with the ESF shall apply. • • Where temporary land use is unavoidable, ensure that land access arrangements are documented, temporary, and restored to pre-use conditions following completion of activities. • Consult affected communities and land users regarding the location and operation of temporary debris storage or disposal sites and establish accessible grievance mechanisms. • Implement site restoration and closure measures to reinstate affected land and remove any residual environmental or safety hazards following completion of debris management activities. • Water exposed surfaces as necessary; cover transported materials; minimize exposed work areas • Prepare traffic management measures; provide signage and traffic controls; always maintain emergency and community access
• Repair of damaged schools, health facilities, and emergency shelters • Temporary works or small-scale rehabilitation works to restore essential service delivery (e.g., local roads, bridges, jetties, emergency repair of water supply lines, sanitation, and energy systems)	• Dust, noise, vibration • Worker injuries and occupational hazards; • Community safety risks;	• Implement dust suppression and noise control measures; • Water exposed surfaces as necessary; cover transported materials; minimize exposed work areas • Restrict noisy activities to daylight hours where feasible; maintain equipment in good condition; notify nearby residents of works • Maintain safe work sites and restrict unauthorized access; Enforce site/perimeter fencing, where necessary. • Provide workers with required PPE and safety training • Limit works to existing footprints wherever possible; • Implement traffic and pedestrian safety measures where necessary; • Require contractors to implement the measures set out in the LMP and HSMF, and to prepare site-specific Health and Safety Management Plans (HSMPs) to operationalize these measures, identify any

Eligible Items/Activities	Potential Risks	Mitigation Measures
		additional environmental and social (E&S) risks and impacts, and establish appropriate mitigation measures.
	• Occupational health and safety risks (excavations, machinery, manual handling)	• Train workers; secure excavations; implement emergency response procedures
	• Chance finds of cultural heritage resources;	• Establish a chance find procedure prior to onset of any disaster of emergency • Apply chance finds procedures if cultural heritage resources are encountered;
	• Minor vegetation disturbance.	• Reinstate disturbed areas following completion of works.
	• Water quality risks associated with temporary water supply systems;	• Test and monitor water quality where temporary water systems are utilized;
	• Temporary disturbance of soil and vegetation during excavation	• Restrict works to existing disturbed areas and infrastructure footprints; minimize vegetation clearance; rehabilitate disturbed areas upon completion
	• Generation of excavated material and construction waste	• Segregate waste where practicable; reuse suitable materials; dispose of waste at approved disposal sites; prohibit dumping into waterways or coastal areas
	• Temporary interruption of water supply services	• Schedule works to minimize service disruptions; notify affected communities in advance; provide alternative water supply arrangements where necessary
	• Contamination of water supply during repair works	• Isolate damaged sections during repair; follow approved utility procedures; disinfect repaired infrastructure before recommissioning; monitor water quality where required
	• Community health and safety risks from open trenches and construction activities	

Eligible Items/Activities	Potential Risks	Mitigation Measures
	• Traffic disruption and restricted access for local communities • Road safety risks for workers and community members • Improper sourcing of fill, gravel, or construction materials • Fuel spills, lubricant leaks, and equipment-related pollution • Worker grievances and labor-related concerns 10. • Community complaints regarding work, disruptions, or safety • Risks associated with extreme weather and climate hazards during implementation • Unanticipated environmental or social impacts identified during implementation	• Install barriers, warning signs, and lighting; restrict public access to work sites; maintain safe pedestrian access where feasible • Prepare traffic management measures; provide signage and traffic controls; always maintain emergency and community access • Establish traffic control measures; use trained traffic controllers where required; provide high-visibility PPE • Obtain materials from licensed and approved sources; prohibit extraction from environmentally sensitive areas or beaches unless legally approved. • Store fuels appropriately; maintain spill kits on site; train workers in spill response; immediately clean up spills • Establish worker grievance mechanism; communicate worker rights; ensure fair working conditions and non-discrimination • Implement Project Grievance Redress Mechanism (GRM); record and address complaints promptly; communicate outcomes to complainants • Monitor weather forecasts; suspend works during unsafe conditions; incorporate climate-resilient repair methods where feasible • Stop affected activity if necessary; undertake additional assessment; implement corrective actions; notify ADB of significant incidents in accordance with ESF requirements

C. Assessment and Management of Environmental and Social Risks and Impacts

73. To mitigate risks associated with inadequate screening and assessment, all proposed sites and activities will undergo environmental and social screening using the screening tools and checklist attached to this ESMF and its annexes, supplemented, as necessary, by additional screening and assessment tools developed by the MFEM and VPMU in accordance with the procedures and requirements set out in this ESMF. The screening process will identify environmentally sensitive areas, protected habitats, critical ecosystems, cultural heritage resources, existing contamination, and other site-specific constraints to inform activity design and implementation and avoid activities in unsuitable locations. Needs assessments and stakeholder consultations will be conducted prior to onset of any disaster or emergency, to identify issues, needs and concerns of the affected populations, including vulnerable groups such as women, older persons, persons with disabilities, Indigenous Peoples, displaced populations, and remote communities, and to ensure that project activities, assistance, and procurement arrangements are responsive to their needs and circumstances. The results of the screening and assessment processes will inform site selection, activity design, procurement planning, and the development of site-specific environmental and social mitigation measures, where appropriate.

D. Labor and Working Conditions

74. As per ADB's ESF, all Project workers, including contracted workers, government personnel engaged in Project activities, and primary supply workers where applicable, shall be managed in accordance with ESS2 and national labor legislation.

75. The Project shall:
   - (i) Prohibit child labor and forced labor;
   - (ii) Promote fair and non-discriminatory employment practices;
   - (iii) Provide safe and healthy working conditions;
   - (iv) Establish worker grievance mechanisms;
   - (v) Ensure equal opportunity and fair treatment of workers;
   - (vi) Provide adequate training and supervision.

76. A preliminary Labor Management Plan (LMP) provides more details on how to manage the pre-identified labor-related risks for this project. Any additional labor-related risks identified during implementation will be assessed and addressed through appropriate management measures as required under ESS2 and Vanuatu's national legislation (see Annex 3). Contractors and service providers shall be required to comply with Project labor requirements as a condition of engagement.

E. Resource Conservation and Pollution Prevention

77. To mitigate risks associated with hazardous substances, waste generation, pollution, and improper waste management, all proposed procurements involving agricultural inputs, veterinary medicines, pesticides, fuels, generators, batteries, pharmaceuticals, medical supplies, and other potentially hazardous materials will undergo environmental and social screening to ensure that adequate storage, handling, transportation, use, and disposal arrangements are in place prior to procurement. Appropriate inventory management systems, storage controls, and, where applicable, cold-chain facilities will be established to minimize spoilage, expiration, and wastage of vaccines, medical products, and veterinary supplies. Procedures for the segregation, collection, storage, transport, treatment, and disposal of hazardous, infectious, pharmaceutical, and other wastes will be implemented in accordance with applicable national regulations and good

international industry practice. Environmental and social screening will also assess proposed repair and rehabilitation sites for potential contamination and other environmental liabilities, and appropriate management measures will be incorporated into site-specific planning and implementation. Fuels, lubricants, chemicals, and equipment will be stored, handled, and maintained in a manner that prevents leaks, spills, and contamination of soil, water resources, and surrounding environments, supported by spill prevention and emergency response measures. Waste generated from temporary facilities, debris clearance activities, rehabilitation works, and project-supported operations will be managed through site-specific waste management measures that prioritize waste minimization, segregation, reuse, recycling, and disposal through authorized facilities.

F. Health, Safety and Security

78. Measures to protect communities shall include:
   (i) Safe transportation and distribution of emergency supplies;
   (ii) Traffic and pedestrian safety measures;
   (iii) Appropriate management of hazardous materials and fuels;
   (iv) Public awareness and communication measures;
   (v) Infection prevention and disease control measures where relevant;
   (vi) Safe management of security personnel, if utilized.

79. Special attention shall be given to vulnerable populations, including women, children, persons with disabilities, and elderly persons. Annex 4: Health and Safety Management Framework (HSMF) provides specific information on potential health and safety risks and impacts associated with each activity, together with indicative mitigation measures. Any unanticipated or unidentified health and safety risks and impacts that emerge during implementation will be assessed and appropriately managed through mitigation measures before the associated activities are undertaken.

G. Land Acquisition and Land Use Restrictions

80. The project will not include any involuntary land acquisition. All sites needed for temporary facility, shelter or rehabilitation/repair will be carried out within pre-identified state-owned land/properties (e.g., schools, hospitals, multi-purpose halls, parks) free from any incumbrances, including informal users. A *Site Selection Screening Checklist* is included in this ESMF to ensure that proposed sites are screened for potential environmental and social risks and impacts.

81. Where such arrangement is not feasible, temporary land use/access agreements may be considered under voluntary arrangement, that will not result to any economic or physical displacement.

82. All temporary facilities and shelters will be established only on a short-term basis to support emergency response activities. Once normal conditions are restored, these facilities and shelters will be properly decommissioned and removed, and the sites will be rehabilitated to their pre-project condition. Under no circumstances will a temporary facility or shelter remain in place for an extended period.

H. Biodiversity and Natural Resources

83. Although significant impacts on biodiversity are not anticipated, activities shall avoid sensitive environmental areas wherever feasible.

Project activities shall:

(i) Avoid impacts on protected areas, critical habitats, and ecologically sensitive locations;
(ii) Prevent pollution of terrestrial, freshwater, and marine environments;
(iii) Minimize unnecessary vegetation clearance;
(iv) Ensure responsible sourcing of materials for emergency rehabilitation works.

84. Any activity with the potential to cause significant biodiversity impacts shall be screened out or subject to additional assessment and approval.

I. Indigenous Peoples

85. While the risk of affecting Indigenous Peoples in the context of Vanuatu's emergency response arrangement is low, MFEM and VPMU will nevertheless undertake social screening, stakeholder mapping, and needs assessments as part of the environmental and social screening process to identify Indigenous Peoples present in, residing in, or having collective attachment to disaster sensitive areas. Meaningful consultations will be conducted with affected communities and relevant stakeholders, including Indigenous Peoples where present, to understand their needs, priorities, vulnerabilities, and potential barriers to accessing project benefits. The results of the assessment will inform project design, beneficiary targeting, stakeholder engagement activities, and the development of culturally appropriate measures to ensure that Indigenous Peoples and other vulnerable groups are effectively included in project planning, consultation, grievance mechanisms, and benefit-sharing arrangements.

J. Cultural Heritage

86. Although the likelihood of affecting cultural heritage during emergency response activities is considered low, all proposed repair, rehabilitation, debris clearance, and related civil works activities will undergo environmental and social screening to identify known cultural heritage resources and culturally significant sites within or near the project area. In the event that previously unidentified cultural heritage resources, archaeological remains, artifacts, structures, or sites of cultural significance are encountered during project implementation, chance find procedures will be implemented. Work will be suspended in the affected area, the relevant authorities will be notified, and appropriate measures will be taken to protect, document, and manage the find in accordance with applicable national regulations and the requirements of ESS8. Contractors and project workers will be informed of the chance find procedures prior to the commencement of works, and the procedures will be incorporated into site-specific management plans and contractual requirements.

K. Monitoring and Adaptive Management

87. The EA, supported by the VPMU, shall monitor implementation of environmental and social mitigation measures throughout Project implementation. Monitoring shall include:

(i) Environmental and social screening outcomes;
(ii) Implementation of mitigation measures;
(iii) Stakeholder engagement activities;
(iv) Worker health and safety performance;
(v) Community health and safety issues;
(vi) Grievance management;
(vii) Environmental including health and safety incidents and accidents

(viii) Establish measures to prevent and address risks of Sexual Exploitation, Abuse, and Harassment (SEAH)and
(ix) Compliance with applicable ESS requirements.

88. Where monitoring identifies unforeseen impacts or ineffective mitigation measures, corrective actions shall be implemented promptly in accordance with the adaptive management principles of the ESF.

L. Contractor and Supplier Requirements

89. Where contractors, suppliers, or service providers are engaged, contractual agreements shall require compliance with ESMF, ADB's ESF and GoV regulatory framework. Contractors and suppliers shall be responsible for:
(i) Compliance with applicable laws and regulations;
(ii) Worker health and safety, including prevention of SEAH risks;
(iii) Waste management;
(iv) Community health and safety;
(v) Environmental protection measures;
(vi) Incident reporting; and
(vii) Cooperation with Project monitoring and supervision activities.

90. Environmental and social performance shall be incorporated into contractor supervision and performance monitoring processes.

VI. CONSULTATION, INFORMATION DISCLOSURE, AND GRIEVANCE MECHANISM

91. This section establishes the requirements and procedures for stakeholder consultation, information disclosure, and grievance management under the Project. It has been prepared in accordance with the ADB's ESF particularly Environmental and Social Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure. The objectives of stakeholder engagement are to:
(i) Ensure stakeholders are informed about Project activities, potential environmental and social risks and impacts, and proposed mitigation measures;
(ii) Facilitate meaningful participation of affected persons and interested parties in Project planning and implementation;
(iii) Promote transparency, accountability, and trust between the Project and stakeholders;
(iv) Ensure the views of vulnerable and disadvantaged groups are considered in decision-making processes;
(v) Provide accessible mechanisms for raising concerns, complaints, and grievances; and
(vi) Support effective management of environmental and social risks and impacts throughout Project implementation.

92. Given the emergency response nature of the Project, consultation and disclosure activities will be undertaken in a manner that is timely, proportionate to the risks and impacts, and adapted to emergency conditions while maintaining the principles of meaningful stakeholder engagement.

A. Stakeholder Identification and Analysis

93. Stakeholders are individuals, groups, or organizations that may be affected by, interested in, or able to influence Project activities. Stakeholders may include:

- (i) Project-Affected Parties;
- (ii) Beneficiaries of emergency assistance and livelihood support;
- (iii) Households affected by disasters or emergency events;
- (iv) Communities receiving essential goods and services;
- (v) Users of rehabilitated infrastructure and restored services;
- (vi) Customary landowners and resource users, where relevant;
- (vii) Workers engaged in Project activities;
- (viii) Vulnerable and disadvantaged groups.
- (ix) Other Interested Parties
- (x) National government agencies;
- (xi) Provincial and municipal authorities;
- (xii) Community leaders and traditional authorities;
- (xiii) Civil society organizations;
- (xiv) Women's groups;
- (xv) Youth organizations;
- (xvi) Faith-based organizations;
- (xvii) Development partners and humanitarian agencies;
- (xviii) Private sector suppliers and contractors.
- (xix) Vulnerable and Disadvantaged Groups

94. Particular attention will be given to identifying and engaging individuals and groups who may face barriers to participation or access to Project benefits, including:

- (i) Women and female-headed households;
- (ii) Persons with disabilities;
- (iii) Elderly persons;
- (iv) Children and youth;
- (v) Remote and isolated communities;
- (vi) Low-income households;
- (vii) Indigenous and customary communities;
- (viii) Persons displaced or otherwise affected by disasters.

95. Measures will be implemented to ensure these groups can participate effectively in consultation processes and access Project benefits and grievance mechanisms.

B. Consultation and Stakeholder Engagement

1. General Principles

96. Stakeholder engagement activities will be guided by the following principles:

- (i) Timely and transparent communication;
- (ii) Inclusiveness and non-discrimination;
- (iii) Cultural appropriateness and respect for customary practices;
- (iv) Accessibility for vulnerable and disadvantaged groups;
- (v) Provision of information in understandable formats and languages;
- (vi) Two-way dialogue and opportunities for feedback; and
- (vii) Documentation and consideration of stakeholder views.

2. Preparedness Consultations Prior to Disaster and Emergency Response

97. Prior to the onset of a disaster, the MFEM and VPMU will undertake advance stakeholder engagement and preparedness consultations to establish communication channels, identify issues and concerns of vulnerable and disadvantaged groups, and agree on practical consultation approaches that can be activated during emergency situations. Consultation methods may include community meetings, focus group discussions, consultations with local authorities and community leaders, engagement with women's groups and organizations representing vulnerable groups, household or rapid needs assessments, public notices, radio announcements, mobile phone messaging, online platforms where feasible, and the use of community-based focal points. Information to be disclosed will include eligibility criteria, types of assistance, delivery arrangements, emergency contact details, grievance redress channels, health and safety measures, and any temporary restrictions or site-specific risks associated with emergency response activities. Consultation processes will be documented, and feedback received will be considered in emergency response planning, beneficiary targeting, site selection, distribution arrangements, and the design of site-specific mitigation measures.

3. During Emergency Response

98. Recognizing that emergency response operations often require rapid implementation, consultation approaches may be adapted to the circumstances while maintaining meaningful engagement. Consultation methods may include:

- (i) Community meetings;
- (ii) Meetings with customary leaders and local authorities;
- (iii) Focus group discussions;
- (iv) Household visits;
- (v) Public notices and information boards;
- (vi) Radio announcements;
- (vii) Mobile phone messaging;
- (viii) Social media and digital communication platforms;
- (ix) Coordination meetings with government agencies and humanitarian partners.

99. Where face-to-face consultation is not feasible due to emergency conditions, alternative communication methods will be used to ensure affected stakeholders continue to receive information and have opportunities to provide feedback.

4. Ongoing Engagement

100. Stakeholder engagement will continue throughout Project implementation and will include:

- (i) Disclosure of Project information;
- (ii) Consultation regarding environmental and social risks and mitigation measures;
- (iii) Notification of planned activities and service interruptions;
- (iv) Engagement with affected communities during implementation;
- (v) Communication of grievance procedures; and
- (vi) Feedback on Project performance and outcomes.

5. Information Disclosure

101. The Project will disclose relevant environmental and social information in a timely, accessible, and culturally appropriate manner. Information to be disclosed may include:

- (i) Project objectives and activities;
- (ii) Eligibility criteria for emergency assistance and support programs;
- (iii) Environmental and social screening procedures;

(iv) Environmental and social management measures;
(v) Stakeholder engagement arrangements;
(vi) Grievance Mechanism (GM) procedures;
(vii) Information regarding environmental and social risks and impacts;
(viii) Updates on Project implementation and progress.

102. Information will be disclosed through appropriate channels, including:
(i) Government websites;
(ii) Public noticeboards;
(iii) Community meetings;
(iv) Local radio broadcasts;
(v) Information leaflets and posters;
(vi) Social media platforms;
(vii) Provincial and municipal offices; and
(viii) Other locally appropriate communication channels.

103. Disclosure materials will be prepared in formats that are understandable and accessible to affected communities, including translation into relevant local languages where necessary.

6. Grievance Mechanism (GM)

104. A Project-level GM will be established to receive and facilitate resolution of concerns and complaints relating to Project activities. The GM will:
(i) Be accessible, transparent, and culturally appropriate;
(ii) Provide a timely process for addressing concerns;
(iii) Be free of charge to users;
(iv) Allow anonymous complaints where appropriate;
(v) Protect complainants from retaliation;
(vi) Promote early resolution of concerns; and
(vii) Support adaptive management and continuous improvement.

105. The GM will not impede access to judicial or administrative remedies available under Vanuatu law.

106. **Types of Grievances.** The GM may receive complaints relating to eligibility for Project assistance, distribution of emergency goods and services, Environmental and Social impacts, Community health and safety concerns, Labor and working conditions, Contractor performance, Stakeholder engagement activities, Access to Project information, Land access issues, Damage to property, and other Project-related concern.

107. **Grievance Submission Channels.** Grievances may be submitted through multiple channels, including verbal complaints, written complaints, telephone, email, SMS or messaging applications, community meetings, local government offices, or project representatives and focal points including contractor GM.

108. Information regarding grievance procedures and contact details will be disclosed widely to affected communities and stakeholders. Under the EA and VPMU, a GM focal point will be appointed whose name, contact details will be shared widely for affected persons, communities and relevant stakeholder information.

109. **Grievance Resolution Process.** The GM will generally follow the steps outlined below:

(i) **Step 1: Receipt and Registration.** All grievances will be recorded in a grievance register and assigned a reference number.
(ii) **Step 2: Acknowledgement.** The complainant will receive acknowledgement of receipt within five (5) working days, where contact information is available.
(iii) **Step 3: Assessment and Investigation.** The grievance will be reviewed and investigated by the Project personnel responsible and relevant authorities, as necessary.
(iv) **Step 4: Resolution.** Proposed corrective actions and resolutions will be communicated to the complainant and implemented within a reasonable timeframe.
(v) **Step 5: Closure.** The grievance will be closed once resolution has been accepted by the complainant or all reasonable efforts to resolve the matter have been completed.
(vi) **Step 6: Appeal.** If the complainant is dissatisfied with the outcome, the grievance may be escalated to higher levels of Project management or referred to appropriate government or judicial mechanisms.

110. **Grievance Timeframes.** The Project will aim to:
(i) Acknowledge grievances within 5 working days;
(ii) Assess and investigate grievances within 15 working days;
(iii) Resolve grievances within 30 working days where feasible.

111. More complex cases may require additional time, and complainants will be informed accordingly.

7. Worker Grievance Mechanism

112. In accordance with ESS2 (Labor and Working Conditions), all Project workers will have access to a separate Worker Grievance Mechanism. The worker mechanism will:
(i) Allow workers to raise workplace concerns confidentially;
(ii) Address issues related to employment conditions, occupational health and safety, discrimination, harassment, and workplace conduct;
(iii) Protect workers from retaliation;
(iv) Be communicated during worker induction and training.

113. The Worker GM will be distinct from the community GM while allowing referral of matters where appropriate.

8. Sexual Exploitation and Abuse, Harassment (SEAH)

114. Given the potential vulnerabilities that may arise during emergency response operations, the Project will adopt a survivor-centered approach to handling complaints related to SEAH. Specific measures will include:
(i) Confidential reporting channels;
(ii) Protection of privacy and survivor safety;
(iii) Referral pathways to appropriate support services;
(iv) Restricted access to sensitive information;
(v) Training of Project personnel on SEA/SH requirements.

115. Such complaints will not be managed through standard grievance procedures and will be handled using confidential referral protocols.

9. Monitoring and Reporting of Stakeholder Engagement and GM

116. The EA, supported by VPMU will monitor implementation of stakeholder engagement and grievance management activities throughout Project implementation. Monitoring indicators may include:

(i) Number of consultations conducted;
(ii) Number and type of stakeholders engaged;
(iii) Participation of vulnerable groups;
(iv) Number of grievances received;
(v) Number of grievances resolved;
(vi) Average grievance resolution time;
(vii) Number of unresolved grievances; and
(viii) Stakeholder satisfaction with Project engagement processes.

117. Information on stakeholder engagement and grievance management will be included in regular environmental and social monitoring reports submitted to ADB.

10. ADB Accountability Mechanism

118. Stakeholders will be informed that, in addition to the Project-level GM, they may access ADB's Accountability Mechanism if they believe they have been adversely affected by an ADB-assisted project and their concerns have not been adequately addressed through Project-level processes.

119. Information regarding the Accountability Mechanism will be made available through Project information materials and stakeholder engagement activities.

VII. INSTITUTIONAL ARRANGEMENTS AND RESPONSIBILITIES

120. This section describes the institutional arrangements, roles, and responsibilities for E&S risk management under the Project. The arrangements have been developed in accordance with ADB's ESF and are intended to ensure that environmental and social risks and impacts are effectively identified, assessed, managed, monitored, and reported throughout Project implementation.

121. Given the contingent emergency response nature of the Project, implementation arrangements are designed to facilitate rapid deployment of assistance while maintaining compliance with applicable environmental and social requirements and the laws of the Government of Vanuatu (GoV).

A. Institutional Framework

122. The Project will be implemented through existing government systems and institutional structures to support timely emergency response and recovery activities. The main institutions responsible for Project implementation and environmental and social management are:

(i) Ministry of Finance and Economic Management (MFEM) – Executing Agency (EA) and leading implementing Agency (IA);
(ii) Vanuatu Project Management Unit (VPMU) – Project implementation and coordination support;

(iii) Participating government ministries, departments, and agencies responsible for implementation of specific activities;
(iv) Provincial and municipal authorities, where applicable;
(v) Contractors, suppliers, and service providers engaged under the Project; and
(vi) ADB.

123. The institutional arrangements are intended to ensure that environmental and social requirements are integrated into Project planning, procurement, implementation, monitoring, and reporting processes.

1. MFEM

124. MFEM will serve as the EA and will have overall responsibility for Project oversight and compliance with the financing agreement and ADB requirements. The responsibilities of MFEM will include:
(i) Providing overall strategic direction and oversight of Project implementation;
(ii) Ensuring compliance with the requirements of this ESMF and applicable Environmental and Social Standards (ESSs);
(iii) Coordinating with ADB on environmental and social matters;
(iv) Ensuring adequate resources are available for implementation of environmental and social requirements;
(v) Reviewing and endorsing environmental and social screening outcomes and management instruments, as required;
(vi) Monitoring Project performance, including environmental and social compliance;
(vii) Ensuring environmental and social reporting requirements are met; and
(viii) Ensuring corrective actions are implemented where non-compliance or significant incidents are identified.

2. VPMU

125. The VPMU will provide day-to-day coordination and implementation support for the Project and will play a central role in environmental and social risk management. The VPMU will be responsible for:

126. **Environmental and Social Screening.** Undertaking or coordinating environmental and social screening of proposed activities; Confirming eligibility of activities under the positive list and exclusion list; Identifying applicable ESS requirements; Determining environmental and social risk levels; Recommending appropriate mitigation measures and management instruments.

127. **Environmental and Social Management.** Supporting implementation of this ESMF and the required management plans developed following screening and assessment; Ensuring environmental and social requirements are integrated into Project activities; Reviewing contractor and supplier compliance with environmental and social obligations; Coordinating implementation of corrective actions where necessary.

128. **Monitoring and Reporting.** Conducting environmental and social monitoring activities; Maintaining environmental and social records and documentation; Monitoring implementation of mitigation measures; Tracking grievances and incident management; Preparing environmental and social monitoring reports for submission to MFEM and ADB.

129. **Capacity Building.** Providing guidance and support to implementing agencies and contractors; Coordinating environmental and social training and awareness activities; Identifying capacity gaps and recommending strengthening measures.

130. The VPMU will be supported by environmental and social specialists with qualifications and experience appropriate to the risks and activities financed under the Project.

3. Implementing Agencies and Participating Government Entities

131. Relevant ministries, departments, and agencies responsible for implementing Project activities will be responsible for ensuring environmental and social requirements are integrated into activity planning and implementation. Responsibilities may include:

(i) Supporting environmental and social screening activities;
(ii) Implementing mitigation measures relevant to their activities;
(iii) Participating in stakeholder engagement processes;
(iv) Supporting grievance management;
(v) Monitoring compliance within their areas of responsibility;
(vi) Reporting environmental and social issues to the VPMU; and
(vii) Supporting incident response and corrective actions.

132. Depending on the nature of the emergency response activities, implementing entities may include agencies responsible for health, water, sanitation, public works, social protection, disaster management, agriculture, and other sectors.

4. Provincial Authorities and Local Government

133. Provincial governments, municipal councils, and local authorities may support Project implementation at the local level. Their responsibilities may include:

(i) Facilitating community engagement and consultations;
(ii) Supporting beneficiary identification and outreach;
(iii) Assisting with disclosure of Project information;
(iv) Supporting grievance resolution processes;
(v) Coordinating local implementation activities; and
(vi) Assisting with monitoring and reporting of local environmental and social issues.

134. Where customary governance systems are relevant, engagement with traditional leaders and community representatives will be undertaken in accordance with local protocols and cultural practices.

5. Contractors, Suppliers, and Service Providers

135. Contractors, suppliers, consultants, and service providers engaged under the Project will be responsible for complying with environmental and social obligations specified in contracts and procurement documents. Responsibilities will include:

(i) Complying with applicable national laws and regulations;
(ii) Implementing relevant environmental and social mitigation measures;
(iii) Maintaining safe and healthy working conditions;
(iv) Managing waste and pollution risks appropriately;
(v) Protecting community health and safety;
(vi) Reporting incidents, accidents, and grievances;

(vii) Cooperating with Project monitoring and supervision activities; and
(viii) Providing environmental and social performance information when requested.

136. Environmental and social requirements shall be incorporated into bidding documents, contracts, and supplier agreements, as appropriate.

6. Environmental and Social Specialists

137. The Project will maintain access to suitably qualified environmental and social specialists to support implementation of this ESMF. The specialists will assist with:
(i) Environmental and social screening and risk assessment;
(ii) Preparation and review of environmental and social management instruments;
(iii) Monitoring and compliance verification;
(iv) Stakeholder engagement activities;
(v) Grievance management;
(vi) Incident investigations and corrective actions;
(vii) Capacity building and training; and
(viii) Environmental and social reporting.

138. Where necessary, specialist expertise may be engaged to address specific issues such as occupational health and safety, biodiversity, cultural heritage, gender, SEAH, disability inclusion, or social protection.

7. ADB

139. ADB will provide implementation support and oversight in accordance with its policies and procedures. ADB's responsibilities will include:
(i) Reviewing environmental and social documentation, as required;
(ii) Monitoring compliance with the ESF and financing agreement requirements;
(iii) Reviewing environmental and social performance reports;
(iv) Providing implementation support and guidance;
(v) Reviewing significant environmental and social incidents and corrective actions; and
(vi) Conducting periodic supervision and monitoring missions.

140. Responsibility for implementation of environmental and social requirements remains with the GoV and implementing entities.

8. Capacity Assessment and Capacity Strengthening

141. While government agencies in Vanuatu have experience implementing development partner-funded projects, emergency response operations often require rapid mobilization under challenging operating conditions. Potential capacity constraints may include:
(i) Limited environmental and social staffing resources;
(ii) Competing demands during emergency response operations;
(iii) Limited experience with ADB's ESF;
(iv) Logistical challenges associated with implementation in remote and outer island locations; and
(v) Resource constraints affecting monitoring and supervision.

142. To address these challenges, the Project will implement capacity-strengthening measures, including:

(i) Training on the requirements of the ADB ESF;
(ii) Training on environmental and social screening procedures;
(iii) Occupational health and safety training;
(iv) Stakeholder engagement and grievance management training;
(v) Incident reporting and investigation training;
(vi) Contractor environmental and social management training; and
(vii) Ongoing technical support from environmental and social specialists.

9. Environmental and Social Resources and Budget

143. Adequate financial and human resources will be allocated to support implementation of this ESMF. Project budgets will include provisions, as appropriate, for:
(i) Environmental and social specialist support;
(ii) Environmental and social screening and monitoring;
(iii) Stakeholder engagement activities;
(iv) Grievance management;
(v) Training and capacity building;
(vi) Incident investigations and corrective actions; and
(vii) Preparation and implementation of any required environmental and social management instruments.

144. The EA will ensure that environmental and social management requirements are adequately resourced throughout the life of the Project.

VIII. MONITORING AND REPORTING

145. Environmental and social monitoring and reporting are essential to ensure that activities financed under the Project are implemented in accordance with the requirements of ADB's ESF), applicable national laws and regulations of the GoV, and the provisions of this ESMF. The objectives of monitoring and reporting are to:
(i) Verify compliance with applicable environmental and social requirements and mitigation measures;
(ii) Assess the effectiveness of environmental and social risk management measures implemented during project activities; Identify emerging environmental, social, health and safety risks and impacts requiring corrective action;
(iii) Track implementation of Environmental and Social Management Plans (ESMPs), Corrective Action Plans (CAPs), Stakeholder Engagement Plans (SEPs), Labour Management Procedures (LMPs), and other relevant instruments;
(iv) Monitor the effectiveness of grievance management mechanisms;
(v) Facilitate adaptive management and continuous improvement during project implementation; and
(vi) Provide timely and accurate information to ADB, government authorities, affected communities, and other stakeholders, as appropriate.

146. Given the emergency response nature of the Project, monitoring and reporting arrangements shall be proportionate to the scale and significance of environmental and social risks and impacts associated with individual activities.

A. Monitoring Framework

147. Environmental and social monitoring shall be undertaken throughout the project cycle, including screening, planning, implementation, operation (where applicable), and completion stages.

148. Monitoring activities shall include:

149. **Compliance Monitoring.** Compliance monitoring will assess whether project activities are being implemented in accordance with:
- (i) This ESMF;
- (ii) Site-specific ESMPs and other environmental and social instruments;
- (iii) Conditions of national permits and approvals;
- (iv) Occupational health and safety requirements;
- (v) Community health and safety measures;
- (vi) Labour and working conditions requirements;
- (vii) Stakeholder engagement commitments; and
- (viii) Applicable ADB ESF requirements.

150. **Performance Monitoring. Performance** monitoring will evaluate the effectiveness of mitigation and management measures and determine whether environmental and social outcomes are being achieved. Performance monitoring may include:
- (i) Effectiveness of erosion and sediment control measures;
- (ii) Waste management performance;
- (iii) Occupational health and safety performance indicators;
- (iv) Community health and safety outcomes;
- (v) Stakeholder engagement activities and participation levels;
- (vi) Functionality of grievance mechanisms;
- (vii) Inclusion of vulnerable and disadvantaged groups in project activities; and
- (viii) Effectiveness of corrective actions implemented to address identified issues.

151. **Incident and Accident Monitoring.** The EA and VPMU shall establish procedures for recording, investigating, and reporting environmental and social incidents including health and safety incident and accidents associated with project activities. Particular attention shall be given to incidents involving:
- (i) Fatalities;
- (ii) Serious injuries;
- (iii) Significant environmental contamination or pollution;
- (iv) Major occupational health and safety events;
- (v) Community health and safety incidents;
- (vi) GBV and SEAH allegations related to project activities;
- (vii) Child labor or forced labor; and
- (viii) Significant social conflict or community unrest related to the project.

152. All incidents should be investigated promptly, and corrective actions shall be implemented to prevent recurrence.

B. Monitoring Methods

153. Monitoring methods may include:
- (i) Site inspections and field observations;
- (ii) Review of contractor records and monitoring data;

(iii) Interviews with workers and affected communities;
(iv) Consultation with stakeholders and community representatives;
(v) Review of grievance records and resolutions;
(vi) Environmental measurements and sampling, where necessary;
(vii) Photographic documentation; and
(viii) Independent audits or third-party verification where warranted by the level of risk.

154. Monitoring frequency shall be determined based on the nature, scale, and risk classification of project activities.

C. Reporting Requirements

155. **Internal Reporting.** Contractors and implementing entities shall submit regular environmental and social performance reports to the PIA. Reports shall include, as applicable:
(i) Progress on implementation of mitigation measures;
(ii) Monitoring results;
(iii) Occupational health and safety statistics;
(iv) Incidents and accidents;
(v) Status of grievances and resolutions;
(vi) Community engagement activities;
(vii) Non-compliance issues; and
(viii) Corrective actions undertaken.

156. **Reporting to ADB.** The EA and VPMU will submit periodic environmental and social monitoring reports to ADB throughout project implementation. Reports shall include:
(i) Status of implementation of environmental and social commitments;
(ii) Summary of monitoring findings;
(iii) Compliance with ESMPs and other environmental and social instruments;
(iv) Stakeholder engagement activities undertaken;
(v) Grievance management performance;
(vi) Summary of incidents and accidents and associated corrective actions;
(vii) Capacity-building activities completed;
(viii) Key environmental and social risks and issues; and
(ix) Planned actions for the subsequent reporting period.

157. Reporting frequency shall be agreed with ADB and may be adjusted to reflect the urgency, complexity, and risk profile of response activities.

D. Incident Notification and Reporting

158. The EA shall notify ADB promptly of any project-related incident or accident that has, or is likely to have, a significant adverse effect on the environment, affected communities, workers, or the public. Initial notification shall include:
(i) Date, location, and nature of the incident;
(ii) Known or suspected causes;
(iii) Immediate response measures undertaken; and
(iv) Planned follow-up actions.

159. A detailed incident report shall subsequently be prepared and submitted to ADB within an agreed timeframe, including root cause analysis, corrective actions, responsibilities, and

implementation schedules. Incident reporting and response procedures shall be consistent with applicable national requirements and ADB ESF requirements.

ANNEX 1: ENVIRONMENTAL AND SOCIAL SCREENING MATRIX

Read and delete: The borrower will update this template with event-specific action plans and corresponding assessments and management measures for E&S risks and impacts. The completed template will be attached to the request to activate the rapid response contingent project (RRCP).

Country Code:
Type of event/emergency: Drought

Activation Number:
Date of Activation Request:

Emergency Activities	Relevant Activity Information	E&S Risks and Impacts	Mitigation Measures	Directly Responsible Unit and Number of E&S Staff
Provision of food to affected households	Describe distribution arrangement, including location, number of target households, number of project workers involved in the provision, duration and schedule, transportation, etc.	Include only those that are not identified in the ESMF. This may include risks related to site-specific hazards. In case all E&S risks and impacts have been identified, state here that all E&S risks and impacts are adequately covered in the ESMF.	Conduct rapid safety assessments of access routes and distribution sites to identify unstable ground, landslide risks, falling debris, and blocked roads, and restrict access to areas deemed unsafe. Other potential E&S risks and impacts, including traffic-related incidents during transport of food supplies, exposure to hazardous conditions or communicable disease, and worker fatigue, have already been identified in the ESMF, and the mitigation measures set out therein are considered adequate given the scale and location of event-specific activities, and actual conditions on the ground.	The district office of the Disaster Risk Reduction and Management division under the Ministry of Defense will directly supervise the distribution in province ABC. The district office has 20 E&S staff, with 4 health and safety officers, and 16 security personnel to escort the project workers in the site.

ANNEX 2: LIST OF KEY INTERNATIONAL ENVIRONMENTAL AGREEMENTS VANUATU IS A SIGNATORY

Treaty/Agreement	Status	Year
Agreement on the International Dolphin Conservation Program	Ratified	2003
World Heritage Convention	Ratified	2002
Kyoto Protocol – greenhouse gas reductions	Acceded	2001
Millennium Development Goals	Adopted	2000
Plant Protection Agreement for Southeast Asia and the Pacific	Ratified	1997
Treaty on the Non-Proliferation of Nuclear Weapons	Ratified	1995
Montreal Protocol on Substances that Deplete the Ozone Layer	Acceded	1994
Vienna Convention for Protection of the Ozone Layer	Acceded	1994
United Nations Convention on Biological Diversity (CBD)	Ratified	1993
United Nations Framework Convention on Climate Change (UNFCCC)	Ratified	1992
Protocol of 1978 Relating to International Convention for Prevention of Pollution from Ships	Ratified	1989
Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)	Ratified	1989
International Convention on the Establishment of an International Fund for the Compensation for Oil Pollution Damage	Ratified	1989
International Convention on Civil Liability for Oil Pollution Damage	Ratified	1983
International Convention for the Prevention of Pollution of the Sea by Oil	Ratified	1983
United Nations Convention on the Law of the Sea (UNCLOS)	Ratified	1982
Convention on Wetlands of International Importance (Ramsar)	Not ratified	

ANNEX 3: LABOR MANAGEMENT PLAN (LMP)

Based on the nature of activities in the eligible expenditure list, the Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions is determined to be applicable to the RRCP. In accordance with ESS2 requirements, this Labor Management Plan (LMP) has been prepared. The LMP establishes the framework through which the PIU and all implementing entities will manage project workers, including associated labor and working condition risks and impacts arising from project activities in Vanuatu.

The objectives of the LMP are to:

a) identify the different categories of project workers likely to be engaged under the project;
b) assess and manage labor-related risks and impacts associated with project activities; and
c) define procedures to ensure compliance with ESS2 and applicable national labor laws and regulations.

The LMP is implemented in a manner consistent with national legislation and in coordination with other relevant Environmental and Social Standards, recognizing linkages across ESSs.

In line with ESS2, the LMP applies to the following categories of project workers:

a) **Direct Workers:** workers engaged or employed directly by a borrower/client (including the project proponent and the project executing and implementing agencies) to work on a project.[6]

b) **Contracted Workers:** workers engaged or employed by a third-party (a party or entity that is not a borrower/client and including contractors, subcontractors, UN agencies, NGOs, brokers, agents or intermediaries) to perform work and/or provide service processes essential for a specific project activity without which a project or project activity cannot continue, regardless of location.

c) **Primary Supply Workers:** Individuals employed or engaged by primary suppliers[7] providing goods and materials essential for project implementation.

d) **Community Workers:** Individuals engaged in community-based activities, including labor-intensive public works or cash-for-work schemes, where such arrangements are implemented, in accordance with ESS2 provisions on voluntary participation, safety, and fair treatment.

[6] Where government civil servants are working with a project, whether full-time or part-time, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project. This LMP does not apply to such government civil servants, except for the provisions related to child labor and forced labor.

[7] Primary suppliers are suppliers who, on an ongoing basis, provide directly to a project goods or materials essential for production and/or service processes that are necessary for a specific project activity and without which a project or project activity cannot continue.

The LMP applies to all project workers, including full-time, part-time, temporary, and seasonal workers.

I. LABOR USE AND WORKER PROFILE

The types of labor required will vary depending on the nature of activities. At this stage, the number and profile of workers cannot be estimated, as the scope and details of activities have yet to be determined. Direct workers may be sourced from various ministries, reflecting the cross-sectoral involvement required for project implementation.

Project Activities	Type of Workers
1. Emergency livelihood support	
1.1. Direct financial assistance to essential service providers	Direct workers
1.2. Targeted cash transfers to vulnerable households, affected workers, or operators of micro- and small enterprises whose primary source of income is materially disrupted by the eligible crisis	Direct workers
1.3. Cash-for-work or similar programs to support debris clearance, clean-up, and other emergency response and early recovery activities	Direct workers and community workers
2. Emergency supplies and equipment	
2.1. Food, root crops, drinking water, hygiene supplies, blankets, tents/shelters, cookware, household kits, agricultural inputs and materials (e.g., seeds, livestock feed), veterinary medicines and supplies.	Direct workers, contracted and supply workers
2.2. Pharmaceuticals, medicines, medical supplies and equipment, personal protective equipment, vaccines and cold-chain supplies, first aid kits, vector control supplies.	Direct workers, contracted and supply workers
2.3. Equipment, temporary facilities, and backup power generation to ensure continuity of public essential public services	Direct workers, contracted and supply workers
2.4. Procurement and/or rental of vehicles, fuel, light equipment (e.g., water pumps, shovels) and heavy equipment (e.g., bulldozers, dump trucks)	Direct workers, contracted and supply workers
3. Emergency repairs and rehabilitation	
3.1. Debris clearance and restoration of access	Direct workers and contracted workers
3.2. Repair of damaged schools, health facilities, and emergency shelters	Direct workers and contracted workers
3.3. Temporary works or small-scale rehabilitation works to restore essential service delivery (e.g., local roads, bridges, jetties, water, sanitation, and energy systems)	Direct workers and contracted workers

II. RELEVANT PROVISIONS IN VANUATU LABOR LEGISLATION

1. Employment Act [Cap. 160]

Provides the primary legal framework governing employment relationships in Vanuatu. It establishes minimum standards on employment conditions, including requirements for formal employment arrangements, clear terms of employment, and protections for workers. Employers are required to provide appropriate terms and conditions of employment, ensure that workers are informed of these terms, and comply with national labor standards.

The Act also prohibits **forced or compulsory labor,** defined as work undertaken without voluntary consent or under the threat of penalty. Limited exceptions are permitted, such as in cases of civic obligations or emergencies, subject to safeguards including consultation and supervision.

In addition, the Act regulates **child labor and the employment of young persons** by setting minimum age thresholds and restricting the types of work that may be undertaken by persons under 18, including prohibiting hazardous and night work. Complementary provisions under the Minimum Wage Regulations establish wage arrangements for young workers and students engaged in permitted forms of work.

2. Health and Safety at Work Act [Cap. 195]

Regulates occupational health and safety in Vanuatu. It requires employers to ensure, as far as reasonably practicable, the health, safety, and welfare of workers, including the provision of safe systems of work, appropriate equipment, and adequate training and supervision. The Act also places duties on employees to take reasonable care for their own safety and that of others, and provides enforcement mechanisms such as inspections and notices to address unsafe conditions.

3. Minimum Wage Regulations [Cap. 182]

Establishes a statutory minimum wage for all workers in Vanuatu. It guarantees that workers receive at least the legally prescribed wage and empowers the Minister to adjust wage levels based on economic conditions or sectoral considerations. The Act also establishes institutional arrangements (now under the Tripartite Labour Advisory Council) to advise on wage setting and ensure fair remuneration.

Minimum Wage and Minimum Wages Board Regulations set specific wage rates applicable to workers, including variations by location, sector (e.g., agriculture), and worker category. These regulations also define wage structures for certain groups, such as seasonal workers and young persons, and may be periodically updated to reflect economic conditions and labor market needs

4. Trade Unions Act [Cap. 161] and Trade Union Regulations

Provide for the establishment and functioning of trade unions in Vanuatu. These laws require registered unions to maintain formal records, including membership lists, governance documents, and financial records, ensuring transparency and accountability

5. **Seasonal Employment Act No. 23 of 2007**

Seasonal Employment Act No. 23 of 2007 regulates recruitment and conditions for seasonal employment, including requirements for licensing of employment agents, formal employment agreements, and pre-departure orientation. It promotes fair recruitment practices, transparency, and worker protection, including obligations for clear communication of employment terms and monitoring by the Commissioner of Labour.

III. ADB ESS2: LABOR AND WORKING CONDITIONS (ESF 2024)

ADB Environmental and Social Standard 2 (ESS2) establishes the requirements for managing labor and working conditions in ADB-financed projects. The standard recognizes that project workers are critical to successful project delivery and seeks to ensure that they are treated fairly, work in safe and healthy conditions, and have access to mechanisms to raise concerns.

Objectives. ESS2 aims to:

- Promote fair treatment, non-discrimination, and equal opportunity for project workers, including disadvantaged or vulnerable workers.
- Prevent and address violence, harassment, bullying, intimidation, exploitation, and SEAH.
- Support freedom of association and collective bargaining.
- Prohibit child labor and forced labor.
- Promote transparent labor-management relationships.
- Provide workers with accessible mechanisms to raise workplace concerns.

Key Requirements: ESS2 includes requirements on:

- Working conditions and labor management.
- Terms and conditions of employment.
- Non-discrimination and equal opportunity.
- Worker accommodation (where provided).
- Freedom of association and collective bargaining.
- Protection of workers, including prevention of child labor and forced labor.
- Management of contracted, community, migrant, and supply-chain workers.
- Worker grievance mechanisms and labor monitoring.

Terms and Conditions of Employment

Workers must receive clear information on their employment conditions, including wages, working hours, leave entitlements, benefits, and grievance procedures. Wages must be paid regularly and workers must receive adequate rest periods and legally required leave.

Non-Discrimination, Inclusion, and SEAH Prevention

Employment decisions must be based on job requirements and not on personal characteristics unrelated to the job. Borrowers must provide equal opportunity and take measures to protect vulnerable workers. Projects must also prevent and address workplace violence, harassment, and SEAH.

Child Labor and Forced Labor

ESS2 prohibits:

- Employment of children below the completion of compulsory schooling and in any case below age 15.
- Hazardous work for anyone under 18.
- All forms of forced labor and human trafficking.

Borrowers must assess risks and take corrective action if child labor, forced labor, or trafficking is identified.

Worker Grievance Mechanism

Projects must establish a dedicated worker grievance mechanism that is:

- Accessible and transparent.
- Responsive and timely.
- Capable of receiving anonymous complaints.
- Separate from the stakeholder grievance mechanism under ESS10.
- Equipped to manage SEAH-related complaints confidentially and using a survivor-centered approach.

Contractor and Supply Chain Management

Borrowers remain ultimately responsible for ensuring compliance with ESS2, including by contractors and subcontractors. They must conduct due diligence, include labor requirements in contracts, monitor contractor performance, and assess risks related to primary suppliers, including child labor, forced labor, and serious safety issues.

Monitoring and Disclosure

The borrower must monitor implementation of labor requirements and disclose the LMP and other relevant E&S documents as required under ESS1 and ESS10.

IV. LABOR RISK ASSESSMENT

As part of the identification of labor-related risks and impacts, the following indicative activities are considered to help understand potential exposure pathways. It should be noted that these represent key risks associated with predictable activities only:

a) **Direct workers** will primarily be engaged in project coordination and oversight activities.

b) **Contracted workers** may support the coordination and implementation of procurement and related activities; transport of goods; debris clearance, repair of damaged schools, health facilities, emergency shelters; and temporary works or small-scale rehabilitation works to restore essential service delivery.

c) **Primary supply workers** will be involved in the production and transportation of goods required for project implementation.

d) **Community workers** may be engaged on a voluntary or cash-for-work basis, in minor debris clearance limited to non-hazardous materials and not involving heavy lifting, as well as in site clean-up and other low-risk, non-hazardous activities.

A. Labor Workforce Influx Risk Analysis

In the aftermath of disasters in Vanuatu, workforce mobility is often significantly constrained due to damaged transport infrastructure, disrupted logistics, isolation of islands, and limited access to affected areas. As a result, project implementation during early recovery and rehabilitation is more likely to rely on locally available labor rather than external workforce influx. While this limits large-scale in-migration of workers, it introduces a distinct set of labor and social risks linked to localized labor concentration, constrained labor supply, and pressure on affected communities.

1. **Localized Labor Concentration and Pressure on Affected Communities:** With limited ability to mobilize external workers, local populations may become the primary labor source for recovery activities. This can lead to increased pressure on affected households to participate in labor-intensive activities (e.g., debris clearance, rehabilitation works, logistics support), potentially exacerbating risks of fatigue, unsafe working conditions, or reduced voluntary participation, particularly where communities are simultaneously coping with loss and recovery.

2. **Risk of Overburdening Vulnerable or Affected Groups:** In constrained labor markets, vulnerable groups—including women, elderly persons, youth, and persons with disabilities—may be drawn into work out of necessity. Without careful task allocation, they may be exposed to work that is physically demanding or unsafe, particularly in post-disaster environments.

3. **Limited Skilled Workforce Availability:** Restricted movement may limit access to skilled workers (e.g., engineers, technicians, safety personnel), which can affect quality and

safety of implementation. This may increase reliance on unskilled or semi-skilled local workers for tasks that require technical capacity, elevating occupational health and safety risks.

4. **Informal Labor Engagement and Weak Oversight:** Emergency conditions and reliance on local labor may result in more informal recruitment practices, including engagement through community leaders or ad hoc arrangements. This can weaken oversight on labor standards, increase risks of unfair labor practices, and reduce traceability of workers.

5. **Community Tensions and Inequitable Access to Work Opportunities:** Limited job opportunities in a constrained labor market may lead to competition among community members, potentially resulting in exclusion, favoritism, or tensions, particularly if selection processes for employment or cash-for-work are not transparent and inclusive.

6. **Reduced External Workforce-Related Risks but Increased Internal Risks:** While risks typically associated with labor influx (e.g., worker–community conflicts, increased demand on local services, SEAH linked to incoming workers) may be relatively lower due to restricted mobility, risks arising within the community itself—such as intra-community tensions, exploitation, or inequitable labor allocation—may become more pronounced.

7. **Constraints on Supervision and Monitoring:** Physical access limitations may affect the ability of the MFEM and VPMU to conduct regular supervision and monitoring of labor conditions, particularly across dispersed islands, increasing the risk of non-compliance with ESS2 requirements.

B. Working Condition Risk Analysis

In the aftermath of disasters or emergency situations, project activities—ranging from cash transfers, relief distribution, and cash-for-work programs to debris clearance, procurement, and small-scale rehabilitation works—are implemented under constrained, high-pressure environments. These conditions may significantly affect the working conditions, safety, and welfare of project workers, including direct, contracted, and community workers.

1. **Occupational Health and Safety (OHS) Risks:** Workers engaged in debris clearance, clean-up, repair works, and restoration of access (e.g., roads, bridges, jetties, utilities) may be exposed to hazardous conditions, including unstable structures, sharp debris, contaminated materials, floodwaters, and use of heavy equipment. Similarly, procurement and transport of goods (e.g., fuel, medical supplies, machinery) and operation of temporary facilities may expose workers to mechanical, electrical, and traffic-related risks.

2. **Unsafe and Uncontrolled Work Environments:** Emergency and early recovery activities are often carried out in environments that are not fully secured or stabilized. This includes damaged schools, health facilities, or public infrastructure where structural integrity may be compromised. Temporary work arrangements and rapid deployment of facilities may also lack adequate safety controls.

3. **Pressure to Deliver Under Emergency Timelines:** Urgent restoration of essential services and delivery of assistance (e.g., cash transfers, food, and medical supplies) may result in extended working hours, insufficient rest periods, and increased physical and mental stress for project workers.

4. **Inconsistent Application of Labor Standards:** Rapid mobilization of labor—including community workers and cash-for-work participants—may result in inconsistent application of labor standards, including terms of employment, fair wages (where applicable), working hours, and access to grievance mechanisms, particularly where monitoring is constrained.

5. **Risks in Cash-for-Work and Community-Based Activities:** Cash-for-work programs supporting debris clearance and early recovery may expose workers to unsafe tasks, including heavy lifting or contact with hazardous materials, particularly if tasks are not clearly defined or supervised. There is also a risk of unclear terms of engagement, including compensation and working conditions.

6. **Exposure to Health Risks and Public Health Hazards:** Workers involved in relief distribution and handling of food, water, medical supplies, vaccines, and hygiene materials may face exposure to public health risks, including communicable diseases, contamination, and biohazards, especially in post-disaster contexts with disrupted sanitation systems.

7. **Use of Equipment and Machinery Without Adequate Safeguards:** Operation of light and heavy equipment (e.g., water pumps, bulldozers, dump trucks) and transport vehicles may pose significant safety risks if operators are untrained or if safety protocols are not in place.

8. **Psychosocial Stress and Fatigue:** Workers may be affected by trauma from the disaster, combined with physically demanding work and exposure to affected communities. This may result in fatigue, reduced attention, and increased likelihood of accidents.

9. **Limited Access to Supervision and Support Systems:** Geographical dispersion, damaged infrastructure, and mobility constraints may limit supervision, monitoring, and availability of emergency response support for injured workers.

10. **Risks Associated with Handling and Distribution of Relief Goods:** Workers involved in transporting and distributing relief (food, medicines, shelters, etc.) may face risks related to crowd management, manual handling, and exposure to insecure or chaotic environments.

C. Child Labor Risk Analysis

The project will not engage child labor in any project activities. However, emergency and post-disaster recovery conditions may create opportunities in which child labor could occur due to disrupted livelihoods, school closures, loss of household income, weakened community oversight, and urgent labor demands. While the likelihood of child labor involvement in project activities is considered low, children or young persons may nevertheless seek or be encouraged to participate in project-related activities, particularly where families face economic hardship or where age verification and labor monitoring systems are constrained during emergency implementation.

Under the Employment Act of Vanuatu, employment of persons under 12 years of age is prohibited, except for limited light work in family-managed agricultural undertakings. Persons under 14 may only be employed in specified light agricultural or domestic work, while persons under 15 are restricted from work in industrial undertakings unless approved by the Commissioner. Persons under 18 are prohibited from night work in industrial undertakings, except under specified conditions, and restrictions also apply to work on ships. Employers in industrial undertakings are also required to maintain a register of young workers under 18.

C. Forced Labor Risk Analysis

In emergency situations and disaster aftermath, including early recovery and rehabilitation, there is a risk that labor may be mobilized under urgent conditions in ways that may blur the line between voluntary participation and forced or compulsory labor. This risk may be heightened by the need for rapid response, weakened institutional oversight, disrupted governance structures, and strong social pressure on affected populations to contribute to recovery efforts.

Under Section 7 of the Employment Act of Vanuatu, forced or compulsory labor is strictly prohibited and defined as any work extracted under the threat of penalty and without voluntary consent. While the law recognizes limited exceptions in emergency situations and for minor communal services, these are subject to conditions, including the requirement that such services are genuinely for community benefit and involve prior consultation with community members or their representatives.

In the context of project activities, risks may arise where individuals are implicitly or explicitly pressured to participate in debris clearance, rehabilitation works, or community-based recovery activities without full and informed consent. Although the likelihood is low, this may occur through social norms, expectations from local leaders, dependency on aid, or fear of exclusion from assistance. In particular, vulnerable groups may feel compelled to participate in labor activities as a condition for receiving relief or access to services.

The risk is also relevant in the implementation of cash-for-work or community labor schemes, where participation may not be fully voluntary in practice, especially where alternative livelihood options are limited. In addition, unclear communication on terms of engagement, lack of documented agreements, or absence of grievance mechanisms may further increase the risk of coercion or involuntary labor.

Although the law allows for emergency-related labor and minor communal services, such arrangements must not involve coercion, must be time-bound, proportionate, and subject to consultation. Failure to meet these conditions could result in practices that are inconsistent with national law and ESS2, particularly where individuals are not able to freely choose whether to participate or withdraw from work without penalty.

D. Risk Analysis of Discrimination and Inequality of Opportunity and Treatment

In disaster and emergency contexts, the urgency of response operations, disruptions to normal governance systems, and reliance on rapidly mobilized labor may create conditions where risks of discrimination and unequal treatment in employment can arise. Vulnerable and disadvantaged groups, including women, persons with disabilities, youth, older persons, and other at-risk populations, may face barriers to accessing work opportunities or participating in recruitment processes, particularly where available work involves hazardous or physically demanding activities that may limit participation or contribute to perceptions of unequal treatment or discrimination.

Emergency-driven labor arrangements may also reduce oversight of recruitment and employment practices, creating conditions where risks of exclusion, favoritism, unequal pay, or other forms of discriminatory treatment may arise. Ensuring transparent, inclusive, and merit-based labor engagement processes is therefore essential to promote equal opportunity, prevent social tensions, and uphold labor rights throughout project implementation

E. Risk Analysis on Project Worker Accommodation

Based on the eligible activities, dedicated worker camps are not anticipated, as emergency response, debris clearance, repair, rehabilitation, and early recovery activities are expected to rely primarily on local labor. However, temporary accommodation may be required where workers are deployed from Efate or other islands to support emergency response and early recovery efforts in affected outer islands. In the aftermath of a disaster, accommodation options may be limited due to damaged housing, disrupted services, competing humanitarian needs, and shortages of available rental facilities. Under these circumstances, workers may need to utilize temporary accommodation arrangements for short periods. Given the limited, dispersed, and temporary nature of such deployments, accommodation-related risks are expected to be low to moderate. Nevertheless, any accommodation arranged or facilitated by the project should be screened and managed to ensure it meets minimum standards for health, safety, security, sanitation, worker welfare, and community protection, consistent with ESS2 and good international practice.

F. Risk Analysis on Freedom of Association and Collective Bargaining

Vanuatu's legal framework recognizes workers' rights to form and join trade unions and provides protections for freedom of association. The law permits workers to establish and participate in independent unions, while registered trade unions are protected under the Trade Unions Act. Publicly available sources also indicate that workers generally enjoy the freedom to organize and join unions, although collective bargaining is not explicitly established in legislation and certain procedural requirements apply to industrial sector.

In the context of emergency response and early recovery operations, risks related to freedom of association and collective bargaining are expected to be unlikely, as the project is not anticipated to involve a large workforce, long-term employment arrangements, or sectors with a history of labor disputes. Most project workers are expected to comprise government personnel, locally recruited workers, contractors, community workers, and short-term labor engaged to support emergency and recovery activities.

G. Collective Dismissal Risk Analysis

Collective dismissal risks are expected to be low in the context of the proposed emergency response and early recovery activities in Vanuatu. The project is not anticipated to involve large-scale civil works, major restructuring of existing organizations, privatization, automation, or operational changes that would result in workforce reductions for economic, technological, structural, or similar reasons. Most project workers are expected to be engaged on a temporary, activity-based, or fixed-term basis to support emergency response, debris management, rehabilitation, logistics, and recovery operations. Workforce reductions that occur upon completion of specific activities or expiry of fixed-term contracts would generally constitute normal project demobilization rather than collective dismissal. Consistent with ESS2, collective dismissal is distinct from routine demobilization at the completion of project activities.

H. Workers Grievance Mechanism Risk Analysis

While emergency conditions may temporarily affect workers' ability to access grievance channels due to disrupted communications, remote deployment locations, and the rapid pace of response activities, these constraints are expected to be temporary, as most emergency response and early recovery activities are anticipated to last only for days to weeks. The project will therefore prioritize the timely receipt, processing, and resolution of grievances during the emergency period to the extent practicable, using accessible and adaptable reporting channels. However, recognizing that some workers may be unable or unwilling to raise concerns during the immediate response phase, the Worker Grievance Mechanism will remain accessible after emergency conditions subside and normal operations resume. This serves as a safeguard of last resort to ensure that any outstanding workplace concerns or grievances that could not be reported or adequately addressed during the emergency period can still be lodged, reviewed, and resolved. Grievances relating to employment conditions, occupational health and safety, wages, accommodation, workplace conduct, discrimination, harassment, or other labor-related matters will continue to be accepted and addressed after the emergency phase to ensure that no worker is denied access to remedy due to the exceptional circumstances of the disaster. Consistent with ESS2, the project will establish a dedicated Worker Grievance Mechanism at the earliest opportunity and maintain accessible, transparent, and non-retaliatory procedures throughout project implementation.

I. Contracted Workers Risk Analysis

The project may engage contracted workers through contractors, subcontractors, and service providers to undertake small-scale rehabilitation and repair works, debris clearance, logistics support, transportation, equipment operation, waste management, emergency facility repairs, procurement, and other recovery-related activities. In emergency and disaster situations, the need for rapid mobilization may limit the time available for contractor due diligence, worker induction, supervision, and ongoing monitoring. Local contractors engaged during emergency response operations may have varying levels of capacity to manage labor issues, maintain employment records, provide adequate supervision, and implement occupational health and safety measures. Consequently, there is a risk that contractual requirements relating to wages, working hours, terms and conditions of employment, occupational health and safety, personal protective equipment, training, worker grievance mechanisms, and labor monitoring may not be consistently implemented without adequate oversight.

Additional risks may arise from the use of informal labor arrangements. Following a disaster, contractors may rely on locally available labor, casual workers, or temporary workers to meet urgent operational needs. Informal recruitment practices, undocumented employment relationships, and unregistered subcontracting arrangements may reduce workers' access to labor protections and increase the risk of inconsistent application of employment standards. Contracted workers deployed to remote islands or disaster-affected communities may also face challenges related to transportation, welfare facilities, communication, fatigue management, and access to grievance mechanisms. Temporary and short-term workers may have limited awareness of their employment rights, workplace procedures, and available channels for raising concerns. These risks may be more difficult to manage where emergency activities are implemented across dispersed locations with limited supervisory presence. Contractors will therefore need to ensure that all workers receive adequate information, supervision, training, and access to effective grievance mechanisms throughout the duration of their engagement.

Vanuatu's labor framework requires employers to provide safe and healthy working conditions and comply with applicable labor obligations. The Employment Act further establishes provisions governing contracts of employment, remuneration, occupational safety, and conditions of work, which provide an important legal basis for managing labor-related risks associated with contracted workers during emergency response and recovery.

J. Community Workers Risk Anaysis

Community workers may be engaged through the cash-for-work program to support activities such as debris clearance, clean-up campaigns, restoration of community access, distribution of relief supplies, community-based monitoring, and other recovery activities that provide immediate benefits to affected communities. Community participation is a common feature of disaster recovery efforts and can strengthen local ownership, social cohesion, and the timely restoration of essential services.

A key risk in emergency settings is the potential blurring of boundaries between voluntary participation and economic necessity. Following a disaster, households may experience loss of income, livelihoods, housing, and access to basic services. Under these circumstances, community members may feel pressure to participate in recovery activities due to social expectations, community obligations, or the need to access project benefits. There is therefore a risk that participation may not always be perceived as fully voluntary if engagement arrangements are not clearly communicated and agreed upon. Particular attention should be given to ensuring that participation is based on informed consent and that individuals can decline or withdraw from activities without penalty or loss of unrelated project benefits.

Community workers may also face occupational health and safety risks when participating in debris clearance, clean-up operations, transport of materials, or restoration of damaged community assets. Emergency activities are often carried out in hazardous environments that may contain unstable structures, sharp debris, contaminated materials, damaged utilities, floodwaters, or other post-disaster hazards. Community workers may have limited prior experience, training, or access to protective equipment, increasing their vulnerability to accidents or injuries.

Another risk relates to the participation of vulnerable individuals, including women, youth, older persons, persons with disabilities, and other vulnerable groups. In disaster-affected communities, these groups may face barriers to participation or may be disproportionately exposed to risks if assigned tasks that exceed their physical capacity or do not adequately consider their specific needs. Conversely, exclusion from community recovery activities may also create perceptions of inequitable treatment or reduced access to project benefits. Community engagement processes should therefore remain inclusive, accessible, and culturally appropriate.

K. Primary Suppliers and Primary Supply Workers Risk Analysis

Under ESS2, primary suppliers are suppliers that provide goods or materials essential to project activities on an ongoing basis, while primary supply workers are the workers engaged by those suppliers in producing, handling, transporting, or distributing such goods and materials. ESS2 requires borrowers and clients to identify and assess risks of child labor, forced labor, and serious occupational health and safety issues associated with primary suppliers.

A key risk in emergency situations relates to rapid procurement and compressed supply chains. Following a disaster, there is often urgent demand for food, water, medicines, vaccines, veterinary products, emergency shelter materials, fuel, and repair supplies. The need for rapid mobilization may reduce the time available for primary supplier due diligence and verification of labor practices, particularly where goods are procured through emergency procedures, multiple intermediaries, or temporary supply arrangements. Consequently, the project may face challenges in obtaining sufficient information regarding labor and occupational health and safety conditions within the supply chain.

Although widespread child labor or forced labor is not generally expected in the project context, post-disaster disruptions may increase reliance on informal labor arrangements or family labor, making labor conditions more difficult to verify.

The table below presents an analysis of potential labor risks and impacts, taking into account the anticipated labor requirements and the baseline conditions in the project areas.

Labor Risk Identification and Analysis

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
Weak oversight, constraints on supervision and monitoring	Physical access limitations may affect the ability of the MFEM and VPMU to conduct regular supervision and monitoring of labor conditions, particularly across dispersed islands, increasing the risk of non-compliance with ESS2 requirement and national legislation.	The MFEM and VPMU will strengthen oversight and implementation arrangements to ensure consistent application and monitoring of labor standards during RRCP implementation. This will include: (i) integrating ESS2 and national labor requirements into all contracts and standard operating procedures; (ii) assigning dedicated staff or focal points responsible for labor compliance; (iii) conducting regular supervision, spot checks, and rapid compliance reviews, including of contractors and community-based activities; (iv) coordinating with relevant labor authorities to support monitoring and enforcement, as feasible; and (v) providing capacity-building and clear guidance to contractors and implementing entities on labor requirements under emergency conditions. To address constraints on mobility, the MFEM and VPMU will adopt adaptive supervision approaches, including the use of trained local focal points, simplified monitoring tools, and periodic decentralized reporting. These measures will support continuous compliance with ESS2 and national legislation under emergency conditions.
Underpayment of contracted workers or primary supply workers	Despite the existence of a legally defined minimum wage, there is a risk that contracted, and supply workers will be underpaid.	The project will enforce the minimum wage and implement it throughout the project / cascade it down to suppliers. A workers' grievance mechanism will be adopted and implemented.
Community tensions and inequitable access to work opportunities	Limited job opportunities in a constrained labor market may lead to competition among community members, potentially resulting in exclusion, favoritism, or tensions, particularly if selection processes	The MFEM and VPMU will implement transparent, fair, and inclusive recruitment processes, including public disclosure of selection criteria and opportunities prior to onset of disaster or emergency. Community consultations will be conducted to support equitable access while avoiding elite

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
	for employment or cash-for-work are not transparent and inclusive	capture. Participation data will be monitored to ensure balanced distribution of employment opportunities across different groups
Informal labor engagement and weak oversight	Emergency conditions and reliance on local labor may result in more informal recruitment practices, including engagement through community leaders or ad hoc arrangements. This can weaken oversight on labor standards, increase risks of unfair labor practices, and reduce traceability of workers.	The MFEM and VPMU will establish standardized labor engagement procedures, including worker registration, documentation of terms of employment, and verification of worker eligibility. The VPMU will require all implementing partners including contractors and NGOs to do the same. All labor engagement, including community-based work and cash-for-work programs, will be documented and subject to oversight, with clear roles and responsibilities defined for supervision. These requirements will also be applied to all implementing partners, including contractors and NGOs, to ensure consistent labor management practices across all project activities
Limited availability of skilled workforce	Restricted movement may limit access to skilled workers (e.g., engineers, technicians, safety personnel), which can affect quality and safety of implementation. This may increase reliance on unskilled or semi-skilled local workers for tasks that require technical capacity, elevating occupational health and safety risks	The MFEM and VPMU will ensure that technically complex or hazardous tasks are undertaken only by qualified personnel. Where skilled labor is limited, simplified work methods, on-site supervision, and basic skills orientation will be provided to local workers. No high-risk activities will be financed under the RRCP. Activities with moderate risks will be restricted until adequate technical capacity and supervision are in place,
Labor disputes over contracts	It is possible that disputes over contracts emerge among contracted and supply workers.	The project will provide workers' GRM with an appeals mechanism outside of the direct employer.
Discrimination against women, persons with special needs and	The emergency context and associated safety risks may result in unequal access to	The MFEM and VPMU will adopt inclusive and non-discriminatory employment measures to ensure equitable

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
other vulnerable groups in employment.	employment and cash-for-work opportunities, potentially excluding women, persons with disabilities, and other vulnerable groups.	access to project-related jobs and cash-for-work opportunities. This will include: (i) targeted outreach and transparent selection processes; (ii) provision of safe and adapted working conditions; (iii) assignment of tasks consistent with workers' capacities and safety requirements; and (iv) monitoring of participation to ensure representation of women, persons with disabilities, and other vulnerable groups, in line with ESS2.
Poor working condition	Workers engaged in debris clearance, clean-up, repair works, and restoration of access (e.g., roads, bridges, jetties, utilities) may be exposed to hazardous conditions, including unstable structures, sharp debris, contaminated materials, floodwaters, and use of heavy equipment. Similarly, procurement and transport of goods (e.g., fuel, medical supplies, machinery) and operation of temporary facilities may expose workers to mechanical, electrical, and traffic-related risks.	The MFEM and VPMU will require all activities involving debris clearance, repair works, restoration of access, operation of equipment, and handling of supplies to be undertaken in accordance with site-specific Occupational Health, Safety, and Security (OHSS) measures. This will include prior hazard identification, use of appropriate personal protective equipment (PPE), safety briefings, task-specific supervision, and incident reporting procedures. Hazardous tasks such as heavy debris removal, work near unstable structures, electrical works, and operation of heavy equipment will be restricted to trained and qualified workers.
	Unsafe and Uncontrolled Work Environments	Before commencing works, the MFEM and VPMU and contractors will conduct rapid site assessments to identify unsafe conditions, including damaged structures, flooding, landslide-prone areas, exposed electrical lines, contaminated materials, or other post-disaster hazards. Work will only proceed once basic site controls are in place, including restricted access to hazardous areas, signage, safe work zones, and emergency response arrangements. Activities in unsafe locations will be deferred or redesigned until risks can be adequately managed.

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
	Extended working hours, insufficient rest periods, and increased physical and mental stress for project workers	The MFEM and VPMU will ensure that emergency implementation timelines do not compromise worker safety, rest periods, or applicable labor standards. Work schedules will be planned to avoid excessive working hours and fatigue, with adequate rest breaks, shift arrangements, and reasonable workloads. Supervisors and contractors will be instructed that urgent delivery of relief, rehabilitation, or recovery activities must not override ESS2 requirements or national labor obligations
	Exposure to Health Risks and Public Health Hazards	Workers involved in relief distribution, handling of food, water, hygiene supplies, medical goods, vaccines, or public health materials will be provided with appropriate OHS training, PPE, hygiene facilities, and safe handling instructions. The MFEM and VPMU will ensure that workers are trained on infection prevention, safe storage and transport of supplies, waste handling, and response procedures for exposure to contaminated or hazardous materials. Where relevant, coordination will be maintained with health authorities to ensure appropriate public health measures are applied.
	Use of Equipment and Machinery Without Adequate Safeguards	The MFEM and VPMU will require that vehicles, light equipment, and heavy machinery are operated only by trained, competent, and, where applicable, licensed operators. Contractors and suppliers will implement equipment safety protocols, including pre-use inspections, maintenance records, safe loading and unloading procedures, traffic management, and exclusion zones around operating machinery. Community workers and untrained personnel will not operate heavy equipment or undertake tasks requiring specialized technical skills.
	Psychosocial Stress and Fatigue	The MFEM and VPMU will require contractors and implementing entities to manage worker fatigue and psychosocial stress through reasonable working hours, rest

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
		periods, rotation of physically demanding tasks, and supportive supervision. Workers will be informed of available grievance and support channels and will not be required to perform tasks beyond their physical or psychological capacity. Supervisors will monitor signs of fatigue, distress, or unsafe behavior and adjust workloads as needed.
	The working conditions of supply workers may be poor. The impact is significant, as it is not known as yet where supplies will be sourced from	Supervision of Supplier Labor Management Practices is essential to mitigate against this risk. A supplier checklist will be used.
SEAH risks among workers	Given the emergency and post-disaster context—characterized by disrupted social structures, urgent service delivery, and increased interaction between project workers and affected communities—there is a heightened risk of sexual exploitation, abuse, and harassment (SEAH). This risk may arise in the course of rehabilitation, relief operations, and early recovery activities, particularly where there are power imbalances, limited oversight, and the presence of vulnerable populations reliant on assistance.	The MFEM and VPMU will implement a survivor-centered and risk-based approach to prevent and respond to SEAH risks during project implementation, including: • **Codes of Conduct (CoC):** Require all project workers, including contractors and community workers, to sign and adhere to codes of conduct that explicitly prohibit SEAH and outline sanctions for violations. • **Training and Awareness:** Provide mandatory induction or refresher training and awareness raising on SEAH prevention, expected behavior, and reporting mechanisms prior to the onset of emergency. • **Safe and Accessible Grievance Mechanism:** Establish confidential, accessible, and survivor-centered grievance mechanisms with multiple reporting channels, ensuring anonymity and protection from retaliation. • **Referral Pathways:** Identify and establish linkages with existing local service providers prior to the onset of emergency or disaster (e.g., health,

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
		psychosocial, legal support) to ensure timely and appropriate support to survivors. • **Supervision and Monitoring:** Strengthen field-level supervision and periodic monitoring, including spot checks and third-party oversight where feasible, to ensure compliance with SEAH requirements. • **Community Engagement and Information Disclosure:** Inform affected communities about expected worker conduct, prohibited behaviors, and available reporting channels, including targeted outreach to vulnerable groups. • **Contractual Obligations:** Integrate SEAH prevention and response measures, including CoC compliance and training requirements, into all bidding and contract documents. • **Sanctions and Accountability:** Enforce clear procedures for investigating complaints and applying sanctions, consistent with national laws and ESS2.
Child Labor	Vanuatu has a robust framework regarding employing children or young persons. However, In the context of emergency and post-disaster recovery, some children may seek or be encouraged to participate in project-related activities, particularly where families face economic hardship or where age verification and labor monitoring are not consistently applied. While such occurrences are considered unlikely, the risk warrants appropriate preventive measures and oversight	The MFEM and VPMU will enforce a strict prohibition of child labor in all project-related activities, in accordance with ESS2 and the Employment Act of Vanuatu. This will include: (i) establishing and enforcing minimum age requirements for all workers; (ii) implementing mandatory age verification procedures and maintaining worker registers, including for community workers and cash-for-work participants; (iii) prohibiting engagement of persons under 18 in hazardous or inappropriate work, including debris clearance involving heavy lifting, unstable structures, or post-disaster hazards; and (iv) incorporating child labor provisions, monitoring requirements, and sanctions into all contracts and

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
		agreements with contractors, subcontractors, and service providers. The MFEM and VPMU will conduct regular supervision and spot checks, including coordination with labor authorities where feasible, and ensure that awareness is raised among communities and workers regarding minimum age requirements. The project grievance mechanism will provide confidential channels for reporting child labor concerns. Any identified cases will be addressed promptly through removal from work and appropriate corrective measures, consistent with ESS2 and national law
Forced labor	There is a risk that, in the context of emergency response, rehabilitation, and early recovery activities, labor may be mobilized in a manner that is not fully voluntary, particularly in community-based work, debris clearance, retrieval operations, and cash-for-work programs. Individuals may be subject to explicit or implicit pressure to participate due to social expectations, reliance on aid, or perceived consequences of non-participation. This may lead to practices that could constitute forced or compulsory labor, contrary to ESS2 and national legislation, particularly where consultation, voluntary consent, and safeguards are not adequately ensured.	The MFEM and VPMU will ensure that all project-related work is undertaken on a fully voluntary basis and in compliance with ESS2 and the Employment Act of Vanuatu. This will include: (i) clearly communicating that participation in project activities, including community-based works and cash-for-work programs, is voluntary and that there are no penalties or loss of benefits for non-participation; (ii) documenting terms of engagement, including consent, nature of work, duration, and compensation, where applicable; (iii) ensuring that any community labor or minor communal services are carried out only following prior consultation with community members or their representatives and are limited in scope, time-bound, and for the direct benefit of the community; and (iv) prohibiting any form of coercion, pressure, or conditionality linked to access to aid or services. The MFEM and VPMU will incorporate forced labor prohibitions and monitoring requirements into all contracts and agreements, conduct regular supervision and spot checks, and coordinate with relevant authorities where

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
		feasible. Awareness-raising will be undertaken to inform communities and workers of their rights, including the right to refuse participation. The project grievance mechanism will provide safe and confidential channels for reporting concerns. Any identified cases of forced labor will be addressed promptly through corrective actions in line with ESS2 and national law.
Project worker accommodation	Temporary accommodation may be needed for workers deployed from Efate or other islands to support emergency response and early recovery activities in affected outer islands. However, accommodation may be limited following a disaster due to damaged housing, disrupted services, and competing demand for available facilities	• Screen all accommodation facilities prior to occupancy to confirm structural safety, suitability for habitation, and absence of significant hazards, particularly in disaster-affected areas • Inform workers of accommodation rules, emergency procedures, available support services, workers' rights, and grievance mechanisms upon arrival and during induction. • Require all workers to sign and comply with a Code of Conduct prohibiting SEAH, gender-based violence, discrimination, harassment, bullying, and other forms of misconduct. • Provide mandatory induction and periodic refresher training on SEAH prevention, respectful workplace behavior, cultural sensitivity, and appropriate interactions with local communities. • Avoid accommodation arrangements that place workers within host family residences or shared sleeping spaces with community members, particularly households with women and children. • Conduct inspections and maintenance of accommodation facilities to ensure continued compliance with health, safety, and welfare standards.

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
		• Comply with the minimum accommodation standards, basic services and accommodation management outlined in this LMP.
Ineffective grievance mechanism	Emergency conditions may temporarily affect workers' ability to access grievance channels due to disrupted communications, remote deployment locations, and the rapid pace of response activities	• Establish worker grievance mechanism at the earliest opportunity and maintain accessible, transparent, and non-retaliatory procedures throughout project implementation • Prioritize the timely receipt, processing, and resolution of grievances • Worker Grievance Mechanism will remain accessible after emergency conditions subside and normal operations resume, to receive, review, and resolve grievances arising during the disaster/emergency response period.

Risk on community workers	Community workers may face risks of involuntary participation due to economic hardship following a disaster, as well as occupational health and safety risks from debris clearance, clean-up activities, damaged infrastructure, and other post-disaster hazards. Limited training, experience, or access to PPE may increase exposure to accidents and injuries, while vulnerable groups may face barriers to participation, disproportionate risks, or exclusion from recovery activities and associated project benefits.	• Prior to any cash-for-work program or engagement of community workers, MFEM and VPMU will prepare/secure the following:
		    ○ Individual or community agreement
		    ○ List of specific activities in which the community workers will be engaged disaggregated by gender and vulnerability (if applicable); and
		    ○ Assess the nature of the potential risks to and impacts on community workers
		• Conduct site-assessment and hazard identification prior to any activities and manage risks following the mitigation measures set out in the HSMF
		• Create opportunities for women, elderly, PWDs and other vulnerable groups for community participation by identifying tasks appropriate to their identified capacities and needs.

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
Risks on contracted workers	Some activities may involve contracted workers	• Conduct labor screening of contractor/ subcontractor prior to engagement, including review of labor management capacity, past compliance records, and worker management procedures. • Require contractors/subcontractors to prepare and implement labor management plan covering recruitment, worker engagement, working conditions, occupational health and safety, worker accommodation (if applicable), grievance management, and demobilization. • Verify that recruitment processes are transparent, non-discriminatory, and compliant with national labor laws and ESS2 requirements. • Monitor contractor compliance with labor, health and safety, and worker welfare requirements throughout project implementation. • Verify that contractors maintain records of worker recruitment, employment terms, training, incidents, grievances, and workforce changes. • Conduct periodic audits, inspections, and spot checks of contractor labor management practices. • Require contractors/subcontractors to prepare and implement workforce demobilization procedures, including timely notification of contract completion, settlement of outstanding wages and benefits, return of project assets, and continued access to grievance mechanisms following demobilization. • Monitor workforce reductions and ensure that any retrenchment or dismissal is undertaken in accordance with applicable laws, contractual requirements, and ESS2.

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
		• Require contractors to adopt and enforce a Code of Conduct, including provisions on SEAH prevention and workplace behavior • Document lessons learned and any labor-related incidents arising during recruitment, engagement, and demobilization to inform corrective actions and future emergency response activities.
Primary suppliers and primary supply workers risks	The need for rapid mobilization may reduce the time available for primary supplier due diligence and verification of labor practices	• Conduct risk-based screening and due diligence of primary suppliers prior to procurement. • Assess primary suppliers for risks of child labor, forced labor, and serious occupational health and safety (OHS) issues. • Require suppliers to provide information on labor management practices and workplace health and safety arrangements • Include labor and OHS requirements in procurement documents, contracts, and supplier agreements • Conduct periodic supplier monitoring, verification, and spot checks where risks are identified • Establish procedures for reporting and addressing child labor, forced labor, and serious safety incidents within the supply chain • Require suppliers to implement corrective actions where labor or OHS non-compliance is identified

Minimum Temporary Accommodation Standards:

- Accommodation facilities shall be structurally safe, weatherproof, and suitable for habitation.
- Living areas shall provide adequate space per occupant and avoid overcrowding.
- Workers shall be provided with individual beds and adequate privacy arrangements.
- Accommodation shall provide adequate ventilation, lighting, temperature control, and protection from insects and pests.
- Separate sleeping, washing, sanitation, and changing facilities shall be provided for male and female workers where applicable.
- Doors, windows, and sanitation facilities shall be lockable and designed to ensure privacy and security.

Basic Services and Welfare Facilities

- Provide reliable access to safe drinking water.
- Provide adequate, clean, and hygienic toilets, showers, and handwashing facilities.
- Provide appropriate solid waste and wastewater management arrangements.
- Provide access to food preparation facilities, cooking areas, or adequate catering arrangements.
- Maintain first-aid supplies and ensure access to emergency medical assistance.
- Provide adequate fire prevention measures, emergency exits, firefighting equipment, and emergency response procedures.
- Ensure adequate lighting in accommodation compounds, walkways, sanitation facilities, and common areas.
- Provide reasonable access to communication services so workers can maintain contact with families and access emergency assistance where necessary.

Accommodation Management:

- Designate a responsible person or entity to oversee accommodation management, inspections, maintenance, and worker welfare.
- Maintain documented accommodation management procedures covering occupancy, health and safety requirements, maintenance, inspections, grievance handling, emergency preparedness, and SEAH prevention.
- Undertake periodic inspections and worker consultations to identify and correct deficiencies in accommodation conditions and services.
- Ensure accommodation arrangements do not restrict workers' freedom of movement, freedom of association, or other rights recognized under applicable law and ESS2

V. INSTITUTIONAL ARRANGEMENTS FOR IMPLEMENTATION OF LMP

In accordance with ESS2 (Labor and Working Conditions), the Project will establish clear institutional arrangements to ensure implementation of the Labor Management Plan (LMP) across all categories of project workers, including direct workers, contracted workers, primary supply workers, and community workers.

The LMP applies to all categories of project workers. Where provisions differ by worker category—particularly for contracted and community workers—these are specified within the relevant sections of the LMP, consistent with a proportionality approach under ESS2.

The MFEM and VPMU has overall responsibility for LMP implementation and compliance. This includes direct management of direct workers and oversight of contractors, subcontractors, suppliers, and community-based activities, including cash-for-work programs. Contractors and third-party providers are responsible for implementing LMP requirements for their workforce, including subcontractors, while the MFEM and VPMU retains supervisory and monitoring functions at all levels.

For community workers, including those engaged through cash-for-work arrangements, MFEM and VPMU will ensure that participation is voluntary, based on prior consultation with communities, and supported by clear terms of engagement, appropriate task allocation, and adequate supervision in line with ESS2 requirements.

For primary supply workers, the MFEM and VPMU and implementing partners will apply due diligence measures proportionate to identified risks, including screening of suppliers and monitoring of labor practices, consistent with ESS2 provisions.

Terms and Conditions

Government civil servants engaged in project implementation will remain subject to their existing terms and conditions under applicable public service regulations. For all other project workers, including contracted and community workers, the following principles will apply in accordance with ESS2 and national law:

- Minimum age requirements will be enforced, with **no engagement of persons below 18 years** in project activities.
- Employment opportunities will be provided on a **non-discriminatory and equal opportunity basis.**
- Workers will receive **fair wages and conditions**, in line with national standards, where applicable.
- Terms and conditions of employment or engagement (including for cash-for-work) will be **clearly communicated prior to commencement of work.**
- Workers will be informed of their **rights, responsibilities, and available grievance mechanisms.**

For **community workers**, terms of engagement will clearly specify the voluntary nature of participation, scope of work, duration, and, where applicable, cash or in-kind compensation arrangements.

Key Procedures

The Project will promote fair treatment of workers, safe and healthy working conditions, and sound worker-management relationships, consistent with ESS2.

All implementing entities, contractors, and workers will be required to comply with LMP provisions and relevant environmental and social instruments.

Recruitment and Engagement Procedures

Recruitment and engagement of project workers, including community workers, will be conducted in a transparent, inclusive, and non-discriminatory manner.

Key procedures include:

- Contractors and implementing entities will submit recruitment plans to the PIU for review and approval.
- Job opportunities will be publicly disclosed through appropriate channels to ensure accessibility, including for women and persons with disabilities.
- Selection processes will promote equitable participation, including efforts to increase women's participation.
- **Age verification** will be conducted to ensure compliance with minimum age requirements.
- All workers, including community workers, will enter into **documented and voluntary agreements or contracts**, as appropriate.

Prior to commencement of work, all workers will receive induction on:

- Terms and conditions of engagement
- Codes of conduct (including SEAH provisions)
- Occupational health and safety (OHS) requirements
- Grievance mechanisms
- Emergency preparedness and response
- Key environmental and social risks and mitigation measures

Worker records will be maintained and made available for review by the PIU/PCU and relevant authorities.

VI. WORKER GRIEVANCE MECHANISM

In line with ESS2, the Project will establish a grievance mechanism (GRM) for all project workers, including direct, contracted, and community workers.

- The GRM will be accessible, confidential, and free from retaliation.
- Workers will be informed of the GRM at the time of recruitment or engagement.

- Grievances will be addressed through a tiered process, starting at the supervisory level and escalating as needed.
- Records of grievances and resolutions will be maintained and reported to the PIU.

Community workers engaged in cash-for-work programs will have equal access to the GRM.

Procedures for Primary Supply Workers

The PIU will apply due diligence in procurement to ensure that primary suppliers comply with national labor laws and ESS2, including with respect to forced labor, child labor, and occupational health and safety.

Where risks are identified, appropriate measures will be implemented, including supplier screening, monitoring, and corrective actions.

VII. MONITORING AND SUPERVISION

The PIU will be responsible for monitoring LMP implementation, in coordination with overall ESMF monitoring arrangements.

- The E&S Specialists will oversee compliance through **regular supervision, spot checks, and review of contractor and community worker engagement**.
- Monitoring will be risk-based and adapted to site-specific conditions and emergency constraints.
- Non-compliance will be reported and addressed through corrective actions and regular E&S reporting.

ANNEX 4: HEALTH AND SAFETY MANAGEMENT FRAMEWORK (HSMF)

This Framework affirms that the implementer places a high priority on health, safety and security throughout project implementation. The implementer will ensure that project activities are carried out in a manner that protects the health and safety of all workers and avoids adverse impacts on surrounding communities and the environment.

This will include compliance with applicable national regulations, contractual requirements, Good International Industry Practice (GIIP), and relevant environmental and social standards and guidelines. The implementer will ensure that only qualified, trained, and medically fit personnel are engaged, and that safe systems of work, equipment, and workplaces are provided and maintained. Adequate information, training, supervision, and coordination mechanisms will be established for all project personnel, including contractors and suppliers.

All work planning and execution will take into account risks to workers and potentially affected communities, including traffic, site access, hazardous materials, and emergency situations, and appropriate mitigation measures will be implemented. The implementer will ensure availability of resources to support effective H&S management, including inspection and certification of equipment, incident reporting and investigation (including near misses), and timely implementation of corrective and preventive actions.

The Framework will promote continuous improvement in H&S performance, efficient use of resources, and reduction of waste, while maintaining effective communication with all stakeholders on health, safety, environmental, and community-related risks.

I. PURPOSE

The purpose of this framework is to guide the identification, assessment, prevention, and management of health safety and security risks that may arise during RRCP implementation. The Plan applies to activities undertaken in post-disaster and emergency situations, including relief distribution, cash transfers, cash-for-work programs, procurement and logistics, operation of equipment, debris clearance, restoration of access, and temporary or small-scale rehabilitation works.

This Plan is intended to protect project workers, including direct workers, contracted workers, primary supply workers, and community workers, as well as affected communities who may be exposed to risks arising from project activities. It will be implemented in accordance with applicable national laws, ADB Environmental and Social Framework requirements, including ESS2 on Labor and Working Conditions and ESS4 on Community Health, Safety and Security, and Good International Industry Practice.

The Plan is also consistent with the general duties under Vanuatu's Health and Safety at Work Act [Cap. 195], which requires employers, so far as reasonably practicable, to ensure the health, safety, and welfare of workers, including safe systems of work, safe equipment, safe handling and transport of materials, adequate training and supervision, and safe access to and from workplaces. The Act also requires employers and self-employed persons to conduct their activities in a manner that does not expose other persons to health and safety risks, which is directly relevant to community health and safety risks under project activities.

II. SCOPE

This Plan applies to all RRCP activities that may create health, safety, environmental, or community safety risks, including:

1. Emergency financing and support activities, such as direct financial assistance to essential service providers, targeted cash transfers to vulnerable households, affected workers, and micro- and small-enterprise operators, and cash-for-work or similar programs supporting debris clearance, clean-up, and early recovery activities.
2. Relief goods and medical supply activities, including procurement, transport, storage, and distribution of food, root crops, drinking water, hygiene supplies, blankets, tents or shelters, cookware, household kits, seeds, livestock feed, veterinary supplies, pharmaceuticals, medicines, medical supplies, PPE, vaccines, cold-chain supplies, first aid kits, and vector control supplies.
3. Equipment, logistics, and public service continuity activities, including equipment, temporary facilities, backup power generation, vehicles, fuel, water pumps, shovels, bulldozers, dump trucks, and other light or heavy equipment.
4. Works and rehabilitation activities, including debris clearance and restoration of access, repair of damaged schools, health facilities, and emergency shelters, and temporary works or small-scale rehabilitation of local roads, bridges, jetties, water systems, sanitation facilities, and energy systems.

The Plan applies across different categories of emergencies, including disasters triggered by natural hazards, pollution or contamination events, health or biological emergencies, food crises, energy disruptions, agricultural pest outbreaks, and animal disease outbreaks.

III. HEALTH AND SAFETY TARGETS

Explosion:	zero
Fatality:	zero
Lost time injury:	zero
Fire incidents:	zero
Vehicle incidents:	zero
SEAH incidents:	zero
Security incidents:	zero

IV. CORE MANAGEMENT PRINCIPLES

The EA/PIU, contractors, suppliers, and implementing partners will manage project activities based on the following principles:

- Prioritize prevention of harm to workers and communities.
- Apply risk-based screening before activities commence.
- Ensure that only trained, competent, and medically fit personnel undertake tasks appropriate to their capacity.
- Restrict high-risk or hazardous work to qualified personnel.
- Ensure community workers engaged in cash-for-work are assigned only light, low-risk, non-hazardous activities.
- Provide safe systems of work, appropriate tools, equipment, PPE, and supervision.

- Maintain safe access, sanitation, drinking water, rest areas, emergency response arrangements, and first aid facilities.
- Prevent adverse impacts on communities, including risks from traffic, equipment, debris, hazardous materials, crowding, disease transmission, and unsafe access to worksites.
- Ensure inclusive and non-discriminatory access to project work opportunities, while protecting vulnerable groups from unsafe tasks.
- Record, report, investigate, and address incidents, including near misses

V. HEALTH AND SAFETY RISK ASSESSMENT

This Health and Safety Risk Assessment is undertaken to identify and evaluate potential hazards and risks commonly associated with activities implemented during disaster response and emergency situations. It is not exhaustive. Activity-specific risks will be further identified and assessed proportionate to the scale, severity, and nature of eligible events, as more detailed information becomes available upon activation. Given the dynamic and often high-risk operating environment, the assessment aims to anticipate conditions that may affect the health, safety, and well-being of personnel, affected communities, and other stakeholders. Any activity that poses significant risks to the health and safety of project workers or the community will not be financed.

A. Common Hazards and Risks Associated with Eligible Events

1) Disasters Triggered by Natural Events

a. Physical/Structural hazards
   - Unstable or collapsed buildings and structures
   - Debris, falling objects, and damaged infrastructure
   - Landslides, mudflows, and ground instability (including aftershocks)
   - Damaged or washed-out roads and bridges

b. Utility and infrastructure hazards
   - Downed or exposed power lines and electrocution risk
   - Gas leaks, explosion, or fire hazards
   - Damaged water, sewage, and drainage systems

c. Environmental and contamination hazards
   - Floodwaters contaminated with sewage, chemicals, and waste
   - Hazardous substances released from debris, storage facilities, or industrial sites
   - Airborne hazards (dust, ash, asbestos, or smoke)

d. Health and biological hazards
   - Mold growth in water-damaged structures
   - Water and vector borne diseases due to poor sanitation
   - Bacteria, pathogens, and decomposing materials

e. Access and operational hazards
   - Disrupted access to affected areas (blocked roads, debris)
   - Restricted mobility affecting emergency response and service delivery
   - Ongoing or cascading hazards (e.g., delayed landslides, flooding)

2) Health or Biological Emergency

a. Infectious diseases (e.g., dengue, malaria, COVID-19, diarrheal diseases) through close contact, contaminated surfaces, and poor sanitation conditions

b. Inadequate water, sanitation, and hygiene (WASH) facilities in rural areas and temporary shelters
c. Challenges in maintaining infection prevention and control (IPC) measures due to resource and infrastructure constraints
d. Disruptions to supply chains affecting delivery of medicines, protective equipment, and essential goods across islands
e. Contaminated workspaces, equipment, and shared facilities
f. Inadequate sanitation, hygiene, and ventilation systems
g. Occupational health and safety risks
    - Increased exposure risk for frontline workers (health workers, community volunteers, relief workers) during service delivery and community engagement
    - Limited availability of personal protective equipment (PPE) and medical supplies, particularly in remote locations
    - Exposure during handling of potentially contaminated materials, waste, or medical equipment
    - Fatigue and heightened stress due to extended response periods and limited workforce capacity
h. Community health and safety risks
    - Increased transmission risks in evacuation centers, temporary shelters, distribution points, and densely populated communities
    - Limited access to healthcare services, particularly in outer islands, leading to delayed diagnosis and treatment and increased morbidity
    - Mental health impacts associated with isolation, fear of infection, and disruption of social and community support systems
    - Increased vulnerability of remote populations, elderly persons, and individuals with underlying health conditions
    - Barriers to effective risk communication due to geographic dispersion and varying levels of health awareness; Potential spread of disease between islands through inter-island travels
i. Security risks
    - Risks related to enforcement of quarantine, isolation, or public health measures
    - Movement restrictions affecting access to workplaces and health services

3) Pollution Contamination

a. Contaminated water (e.g., sewage discharge, poor wastewater management) leading to gastrointestinal illness and waterborne diseases
b. Contaminated seafood due to marine pollution (e.g., microplastics, chemicals, harmful algal blooms)
c. Presence of hazardous chemicals, waste, or fuel/oil residues from improper disposal or spills
d. Bioaccumulation of toxins in the food chain affecting long-term health outcomes
e. Occupational health and safety risks
    - Exposure of workers to contaminated water, hazardous waste, and polluted sites during cleanup, construction, or rehabilitation activities
    - Exposure to toxic substances and residues (e.g., chemicals, fuels, heavy metals) through inhalation, ingestion, or dermal contact
    - Increased risk of acute poisoning, skin irritation, and respiratory illnesses due to handling contaminated materials

- Fire, explosion, or chemical exposure risks arising from improper handling, storage, or disposal of fuels and hazardous substance
- Elevated exposure risks due to inadequate personal protective equipment (PPE) and limited training in hazardous materials management, particularly in remote or resource-constrained settings

f. Community health and safety risks
   - Increased incidence of gastrointestinal and waterborne diseases due to consumption or use of contaminated water
   - Foodborne illnesses associated with consumption of contaminated fish and seafood
   - Long-term health impacts (e.g., chronic toxicity, neurological effects) from bioaccumulation of pollutants in the food chain
   - Reduced access to safe water and food sources, particularly in coastal and resource-dependent communities
   - Increased health risks for vulnerable groups (e.g., children, elderly, persons with underlying conditions) due to exposure to contaminated environments.

4) Food Crisis

a. Contaminated food sources (e.g., spoiled food, food contaminated by bacteria, viruses, chemicals, toxins, or pests)
b. Unsafe drinking water and water sources (e.g., polluted or untreated water used for drinking, cooking, or food preparation)
c. Poor sanitation and hygiene conditions (e.g., inadequate waste disposal, lack of handwashing facilities, poor food handling practices)
d. Malnutrition-related conditions (e.g., inadequate access to nutritionally sufficient and safe food)
e. Food storage hazards (e.g., improper storage temperatures, mold growth, pest infestation, and damaged food packaging)
f. Biological hazards (e.g., exposure to disease vectors such as rodents, flies, mosquitoes, and other pests around food and living areas)
g. Chemical hazards –(e.g., exposure to pesticides, contaminated agricultural inputs, fuel contamination, or unsafe food additives)
h. Physical hazards (e.g., foreign objects in food supplies, damaged containers, unsafe cooking equipment, or debris in food preparation areas)
i. Crowded food distribution environments (e.g., congested distribution points and poorly organized queues)
j. Unsafe working conditions during food distribution or relief operations –(e.g., manual handling activities, unstable structures, poor lighting, and unsafe equipment use)
k. Extreme environmental conditions (e.g., excessive heat, flooding, dust, smoke, or severe weather affecting food handling and distribution activities)
l. Occupational health and safety risks
   - Increased exposure to risks for workers engaged in emergency food production, fishing, and recovery activities under resource constraints
   - Fatigue and physical strain among workers due to increased labor demands
   - Increased security risks to workers due to potential conflicts over access to food resources.

m. Environmental and operational hazards

- Disruptions in supply chains and transport systems, particularly affecting outer islands and remote communities
- Poor storage and handling practices may result in unsafe or contaminated food, increasing the risk of foodborne illnesses (e.g., bacteria, parasites, toxins)
- Limited storage infrastructure contributing to food scarcity

n. Community security risk
   - Potential for conflict over access to food and marine resources

5) Energy Crisis

a. Power outages and unreliable electricity supply
b. Use of diesel generators and fuel-based equipment
c. Handling and storage of fuels (diesel, petrol) and flammable materials
d. Faulty or temporary electrical installations and repair works
e. Limited access to electricity in rural and outer island communities
f. Disruptions to energy-dependent services (water supply systems, healthcare facilities, cold storage, communications, transportation)
g. Reduced lighting in homes, workplaces, and public spaces.
h. Fire hazards associated with the use of alternative fuels such as candles, wood-based cooking, kerosene, or gas lamps.
i. Occupational health and safety risks
   - Carbon monoxide exposure for workers operating generators or fuel-powered equipment
   - Fire, explosion, and burns associated with fuel handling and storage;
   - Electrocution risks during installation, repair, or maintenance of electrical systems
   - Exposure to noise, fumes, and hazardous emissions
   - Fatigue, stress, and increased likelihood of accidents due to extended working hours during emergency response and restoration
   - Injuries from unsafe or improvised electrical connections and temporary power systems.

j. Community health and safety risks
   - Increased risk of fire, burns, and accidents from use of candles, kerosene lamps, or open flames for lighting and cooking
   - Disruptions to healthcare services (e.g., vaccine refrigeration failure, reduced facility operations) leading to adverse health outcomes
   - Reduced access to safe water and sanitation services due to power-dependent systems failing
   - Food spoilage and increased foodborne illness risks due to lack of refrigeration
   - Reduced nighttime visibility increasing risks of accidents, injuries, and security incidents
   - Impacts on vulnerable groups (e.g., elderly, persons with disabilities) due to limited access to energy-dependent services.

k. Community security risk
   - Potential for conflict over access to food and marine resources

6) Agricultural Pest or Animal Disease Outbreak

a. Disruptions to energy-dependent services (water supply systems, healthcare facilities, cold storage, communications
b. Exposure to infected animals and animal products
c. Presence of disease-carrying pests and vectors (e.g., insects, rodents, ticks, and other carriers)
d. Exposure to animal waste and contaminated materials
e. Use and handling of pesticides, insecticides, veterinary drugs, and disinfectants
f. Chemical storage, mixing, and application activities
g. Handling, transport, and disposal of infected animals or carcasses
h. Contact with contaminated soil, water, feed, or agricultural materials
i. Dust, bioaerosols, and airborne contaminants generated from livestock facilities and agricultural operations
j. Manual handling and repetitive physical activities during culling, cleaning, disposal, and response operations
k. Use of agricultural machinery, tools, and equipment during outbreak control activities
l. Poor sanitation and hygiene conditions in farms, livestock areas, and temporary containment sites
m. Crowded animal holding, quarantine, or treatment facilities
n. Exposure to extreme weather and environmental conditions during field operations
o. Unsafe transportation conditions during movement of animals, feed, equipment, and response personnel
p. Inadequate use or availability of personal protective equipment (PPE) during outbreak response activities

B. Common Health and Safety Risks Associated with Eligible Expenditures

1) Provision of Financial Assistance and Cash Transfers

a. Occupational Health and Safety Risks
   - Exposure to environmental hazards during on-site distribution (e.g., heat, rain, damaged infrastructure, debris)
   - Traffic and accident risks during travel to and from distribution sites
   - Fatigue and stress due to extended working hours and high-pressure emergency conditions; Security risks (e.g., theft, violence) associated with handling and transporting cash
   - Exposure to communicable diseases during in-person interaction with beneficiaries

b. Community Health and Safety Risks
   - Crowd-related risks (e.g., congestion, panic, stampede) at distribution sites; Transmission of infectious diseases during gatherings
   - Security risks, including theft, conflict, or violence targeting beneficiaries
   - Unequal access to assistance, potentially exacerbating social tensions and vulnerability
   - Risks of exclusion of vulnerable groups due to information or access barriers

2) Cash-for-Work Programs

   a. Occupational Health and Safety Risks
      - Physical injuries from debris removal, clean-up, and minor works (e.g., cuts, falls, musculoskeletal strain)
      - Exposure to hazardous materials (e.g., contaminated debris, sharp objects, unstable structures)
      - Electrocution risks (e.g., contact with damaged power lines)
      - Inadequate PPE and lack of training in safe work practices
      - Fatigue and overexertion due to physically demanding labor
      - Exposure to communicable diseases during group work activities

   b. Community Health and Safety Risks
      - Public exposure to unsafe work sites (falling debris, moving equipment)
      - Disruptions to access and mobility due to ongoing works
      - Conflict over participation in cash-for-work opportunities

3) Provision of food, root crops, drinking water, hygiene supplies, blankets, tents/shelters, cookware, household kits, agricultural inputs and materials (e.g., seeds, livestock feed), veterinary medicines and medical supplies

   a. Occupational Health and Safety Risks
      - Manual handling injuries during transport and distribution of goods
      - Exposure to contaminated or hazardous materials (e.g., spoiled food, medical waste)
      - Environmental exposure (heat stress, flooding, debris, unstable terrain)
      - Increased fatigue and stress due to continuous emergency operations
      - Risk of infection from handling health supplies or interacting with affected populations

   b. Community Health and Safety Risks
      - Risk of disease transmission in crowded distribution areas
      - Foodborne or waterborne illness from improper storage or mishandling or contaminated supplies
      - Injuries from overcrowding, unsafe access routes, or poorly managed distribution sites
      - Inequitable access to relief goods leading to social tension or conflict
      - Safety risks for vulnerable groups (elderly, persons with disabilities) in accessing relief goods.

4) Procurement of Logistics, Vehicles, Fuel, and Equipment

   a. Occupational Health and Safety Risks
      - Injuries related to operation of machinery and equipment (e.g., loaders, excavators)
      - Fire, explosion, and chemical exposure risks from handling fuel and hazardous material
      - Exposure to dust, noise, and airborne contaminants during debris clearance

- Contact with hazardous waste, contaminated materials, or unstable structures
- Fatigue and human error due to long working hours under emergency conditionss

b. Community Health and Safety Risks
   - Increased traffic risks for communities (accidents involving project vehicles)
   - Exposure to dust, noise, and debris from these equipment/vehicles affecting nearby communities
   - Environmental contamination from potential spills/mishandling during transport
   - Safety risks from unsecured equipment
   - Security risks (e.g., theft of fuel, vehicles, or equipment)

5) Debris clearance and Restoration of Access

a. Occupational Health and Safety Risks
   - Injuries (cuts, fractures, crush injuries) from handling debris, sharp objects, unstable materials, and damaged structures
   - Falls from uneven terrain, collapsed surfaces, or working at height (e.g., clearing trees, damaged roofs, bridges)
   - Electrocution risks from contact with downed or exposed power lines and damaged electrical infrastructure
   - Accidents involving heavy machinery and equipment (e.g., loaders, excavators, trucks)
   - Traffic and transport-related accidents during debris hauling and access restoration activities
   - Exposure to dust, ash, and airborne contaminants during debris removal
   - Contact with hazardous materials (e.g., asbestos, fuel residues, chemicals, contaminated waste)
   - Exposure to contaminated water, sewage, or sediments in flooded or low-lying areas
   - Heat stress, dehydration, and exhaustion due to tropical climate and physically demanding work conditions
   - Exposure to adverse weather conditions (rain, strong winds, landslides) during ongoing disaster recovery operations
   - Increased exposure to communicable diseases (e.g., dengue, leptospirosis, diarrheal diseases) in post-disaster environments
   - Exposure to vectors (mosquitoes, rodents) present in debris and stagnant water
   - Risk of infection from injuries due to poor hygiene conditions or limited access to medical care
   - Fatigue and reduced alertness due to long working hours and emergency response pressure
   - Limited availability or improper use of PPE and inadequate training in hazard recognition

- Increased likelihood of human error due to stress and urgency of operations

b. Community Health and Safety Risks
   - Injuries to community members from debris removal activities (e.g., falling objects, moving equipment, open trenches)
   - Exposure to unsafe or poorly demarcated work sites, particularly near homes, schools, or public areas
   - Risks associated with children or bystanders accessing active work zones; Restricted or disrupted access to roads, footpaths, and transport routes during debris removal and repairs
   - Increased traffic accidents due to damaged roads, congestion, and movement of heavy vehicles
   - Isolation of remote communities due to delayed restoration of access
   - Exposure to dust, noise, and airborne contaminants affecting nearby communities
   - Continued exposure to hazardous debris, contaminated materials, or flood residues if not safely managed
   - Risks to public health from delayed restoration of essential services (water supply, sanitation, electricity)
   - Reduced access to healthcare, and emergency services during restoration works
   - Increased risk of accidents, theft, or unauthorized access to construction materials and equipment
   - Community tensions arising from perceived inequities in prioritization of access restoration
   - Heightened safety risks for vulnerable individuals navigating damaged infrastructure or accessing services during restorations

6) Repair Works (Restoration of Access and Infrastructure)
   a. Occupational Health and Safety Risks
      - Injuries from working in unstable or partially damaged structures (e.g., collapse, falling objects, unsafe surfaces)
      - Injuries associated with construction and repair activities, including use of tools, equipment, and temporary works
      - Electrocution risks from contact with exposed wires, damaged electrical systems, or faulty equipment
      - Exposure to hazardous materials such as contaminated debris, sewage, fuel residues, or construction waste
      - Exposure to dust, noise, vibration, and airborne contaminants during repair and rehabilitation works
      - Traffic and transport-related accident risks during movement of workers, materials, and equipment
      - Confined space hazards (e.g., sewer or water system repairs)
      - Heat stress, fatigue, and reduced alertness due to accelerated work schedules in emergency contexts
      - Increased likelihood of human error due to time pressure and accelerated restoration of essential services

b. Community Health and Safety Risks

- Exposure of community members to unsafe worksites, including falling materials, moving equipment, open excavations, and poorly secured areas
- Increased risk of accidents, particularly for children, patients, and shelter occupants in proximity to active works
- Disruption to access and mobility (e.g., roads, bridges, footpaths), potentially limiting access to health, education, and essential services
- Traffic safety risks due to construction vehicles, detours, and congested or damaged road conditions
- Exposure to dust, noise, vibration, and air pollution affecting nearby residents, schools, and health facilities
- Public health risks arising from delayed restoration or temporary disruption of water supply, sanitation, and energy systems
- Exposure to poorly managed construction waste or hazardous materials, leading to injury or contamination
- Safety and security risks due to inadequate site control, signage, or restricted access to construction areas

C. SEAH Risk Assessment

In the context of emergency response and post-disaster recovery, the risk of sexual exploitation, abuse, and harassment (SEAH) is significantly elevated due to a combination of operational, social, and environmental factors:

1. **Disrupted Social and Institutional Systems**

Post-disaster conditions often weaken formal protection systems, law enforcement, and community governance structures. This reduces oversight and accountability, increasing the likelihood that inappropriate behavior by project workers may go undetected or unreported.

2. **Heightened Power Imbalances**

Project workers, particularly those involved in relief distribution, beneficiary identification, site supervision, or cash-for-work implementation, may hold decision-making power over access to employment, aid, or services. This creates a risk of SEAH, including exploitation in exchange for goods, services, or preferential treatment.

3. **Increased Vulnerability of Affected Populations**

Displaced persons, households that have lost livelihoods, women-headed households, persons with disabilities, and other vulnerable groups may be more susceptible to exploitation due to economic dependency, limited access to support systems, and urgent survival needs.

4. **Nature of Emergency and Early Recovery Activities**

Activities such as relief distribution, temporary shelter support, debris clearance, rehabilitation works, and community-based programs often require close and frequent interaction between workers and community members. These interactions may occur in uncontrolled or poorly supervised environments, increasing exposure to SEAH risks.

5. **Informal and Rapid Labor Mobilization**

Emergency implementation may involve rapid recruitment of workers, including contractors and community labor, sometimes with limited screening, training, or supervision. This can increase the likelihood of employing individuals without adequate awareness of acceptable conduct or SEAH standards.

6. **Limited Awareness and Reporting Mechanisms**

Affected communities may have limited awareness of their rights, expected standards of behavior, or available reporting channels. Social stigma, fear of retaliation, or mistrust in complaint systems can further discourage reporting of SEAH incidents.

7. **Weak Monitoring and Oversight in Emergency Contexts**

Time pressures, access constraints, and logistical challenges may limit the ability of the MFEM and VPMU to conduct regular supervision, increasing the risk that incidents of SEAH are not prevented, detected, or addressed promptly.

8. **Risks in Community-Based and Cash-for-Work Activities**

Cash-for-work and community labor programs may introduce risks of harassment, exploitation, or abuse in worker selection, wage payment, supervision, or task allocation, particularly where transparency and grievance mechanisms are not robust.

The SEAH risk in this context is **context-driven and operationally induced**, arising from:

- frequent worker–community interactions;
- dependency relationships linked to aid and employment;
- weakened institutional safeguards; and
- accelerated implementation arrangements under emergency conditions.

Key Exposure Pathways

- Relief goods distribution and beneficiary targeting
- Worker recruitment and selection processes (including for cash-for-work)
- Supervision of worksites and community activities
- Informal interactions at worksites, temporary settlements, and distribution points
- Logistical and transport arrangements involving project workers

VI. HEALTH, SAFETY AND SECURITY RISK MANAGEMENT MEASURES

A. Pre-Activity Risk Screening and Site Assessment

Before commencement of any activity, the MFEM and VPMU or contractor will conduct a rapid health, safety, and community safety screening. The screening will identify:

- Type of emergency and site conditions.

- Expected activities and worker categories involved.
- Potential hazards to workers and communities.
- Presence of vulnerable groups, including children, elderly persons, persons with disabilities, and displaced households.
- Site access constraints and emergency evacuation options.
- Need for PPE, equipment, first aid, traffic control, sanitation, and supervision.
- Any risk of hazardous materials, unstable structures, contaminated areas, flooding, landslides, electrocution, disease transmission, or community exposure.

For higher-risk activities, including debris clearance, repair works, equipment operation, fuel handling, temporary power generation, and rehabilitation of damaged infrastructure, a site-specific Health, Safety, and Community Safety Plan will be prepared before works begin.

B. General Health and Safety Requirements

1. Mobilization of Machinery, Equipment, and Tools

All machinery, equipment, vehicles, and tools mobilized for project activities will be inspected before use to confirm that they are fit for purpose, maintained in safe operating condition, and compliant with applicable legal, contractual, and manufacturer requirements. Equipment will only be operated by trained and competent personnel.

The contractor or supplier will maintain records of equipment inspection, maintenance, and certification. Heavy equipment, including bulldozers, dump trucks, cranes, generators, and similar machinery, will be subject to pre-use checks and periodic inspections by competent persons.

Unsafe, defective, or uncertified equipment will not be used until repaired, certified, or replaced. Where equipment use may create risks to surrounding communities, exclusion zones, warning signs, spotters, traffic controls, and public access restrictions will be established.

2. Mobilization of Workers and Community Workers

All workers will receive induction before starting work. Induction will cover key risks, safe work procedures, PPE requirements, emergency response, incident reporting, worker grievance mechanisms, code of conduct, SEAH prevention, and community safety requirements.

Workers will be screened for fitness, competence, and suitability prior to assignment. Persons who are not physically or medically fit for specific tasks will not be assigned to those tasks. No person below 18 years of age will be engaged in project work, including cash-for-work activities.

Community workers will only be engaged on a voluntary or cash-for-work basis, with clear information on the nature of work, duration, compensation, working hours, supervision, and grievance channels. Community workers will not be assigned to hazardous work, heavy lifting, operation of heavy equipment, work at height, electrical works, night work, or tasks involving contaminated or unstable materials.

3. Provision and Use of PPE

Appropriate PPE will be provided in sufficient quantity before activities commence. PPE may include, as relevant, helmets, gloves, boots, high-visibility vests, masks, eye protection, face shields, hearing protection, harnesses, and respiratory protection.

PPE will be checked for quality before issuance and periodically inspected thereafter. Defective PPE will be repaired or replaced. Workers will be instructed on proper use, care, and limitations of PPE. Contractors will maintain a PPE issuance register.

Community workers involved in clean-up, light debris sorting, distribution support, or similar activities will receive PPE appropriate to the task, such as gloves, closed shoes or boots, masks, and reflective vests.

4. Drinking Water, Sanitation, and Welfare Facilities

Safe drinking water will be provided at accessible locations and clearly marked as drinking water. Adequate washing facilities will be provided and maintained in clean and hygienic condition.

Latrines and urinals will be provided at worksites, distribution sites, worker accommodation, and other relevant facilities. Separate facilities for men and women will be provided where feasible and appropriate. Toilets and washing areas will be adequately lit, cleaned regularly, and maintained in sanitary condition.

Rest areas or shaded shelters will be provided to allow workers to take breaks, particularly during hot weather, heavy physical activity, or long working periods. Canteen or food areas, where provided, will be kept clean and protected from contamination, pests, and fire risks.

5. Medical Facilities, First Aid, and Emergency Vehicles

Each worksite or activity area will have access to first aid facilities proportionate to the level of risk. Qualified first aiders will be available during working hours and/or duration of activities. Names and contact details of first aiders will be displayed at visible locations.

First aid boxes will be clearly marked and located within quick reach of workers. They will be inspected regularly and replenished as needed. Injuries will be treated, recorded, and reported.

For higher-risk worksites or remote activities, the contractor will identify the nearest medical facility and establish emergency transport arrangements. Where required, an emergency vehicle or other evacuation arrangement will be available. Medical waste, if generated, will be managed and disposed of in accordance with applicable requirements.

6. Housekeeping, Waste Management, and Scrapyard

Work areas will be maintained in good order to reduce risks of slips, trips, falls, fire, contamination, and injury from debris or sharp materials. Scrap, waste, and hazardous materials will be segregated and stored safely.

Where needed, a designated scrapyard or waste storage area will be established for metal scrap, wood, general waste, and hazardous waste. Waste will be segregated into biodegradable, non-biodegradable, recyclable, and hazardous waste categories, consistent with the project's waste management procedures.

Community access to waste storage areas, hazardous materials, and debris piles will be restricted through barriers, signage, and supervision.

7. Illumination and Night Work

Adequate lighting will be provided in all work areas, access routes, storage areas, temporary facilities, and emergency response locations. Hand lamps and portable lighting will be suitable for site conditions and protected against breakage.

Night work will generally be avoided, particularly for community workers and activities involving machinery, debris clearance, or hazardous conditions. Where night work is unavoidable for emergency response or continuity of essential services, it will be subject to prior approval, adequate lighting, supervision, emergency preparedness, and community safety controls.

8. Fire Safety and Emergency Preparedness

Fire extinguishers and fire prevention measures will be provided at worksites, storage areas, canteens, fuel storage locations, temporary facilities, and generator sites. Workers will be trained on emergency procedures, evacuation routes, fire response, and incident reporting.

Emergency preparedness arrangements will include communication protocols, first aid, evacuation, contact lists, emergency transport, and coordination with local authorities and health services. Mock drills will be conducted where feasible and proportionate to the risk.

C. Community Health, Safety, and Security Measures

Project activities will be planned and implemented to avoid or minimize risks to affected communities. The MFEM and VPMU and contractors will implement community safety measures, including:

- Securing work areas and restricting unauthorized access.
- Installing warning signs, barriers, fencing, or temporary controls around hazardous areas.
- Managing traffic and movement of vehicles and heavy equipment near communities.
- Preventing community exposure to debris, hazardous materials, contaminated waste, fuel, chemicals, medical waste, or unsafe structures.
- Ensuring safe crowd management during relief distribution and cash transfer activities.
- Providing information to communities on activity schedules, site risks, restricted areas, and grievance/reporting channels.
- Coordinating with local authorities and community representatives where activities may affect public access, movement, services, or community safety.
- Ensuring that project personnel comply with codes of conduct, including requirements related to respectful behavior, SEAH prevention, and non-discrimination.

The Health and Safety at Work Act [Cap. 195] provides that employers and self-employed persons must conduct their undertakings so that persons other than their employees are not exposed to health and safety risks, which supports the application of community health and safety controls under the project

D. Activity-Specific Health, Safety, and Community Safety Measures

This is based solely on a preliminary risk assessment of activities listed under the eligible expenditure list and is not exhaustive. Where these are insufficient, or where more detailed information becomes available at the time of activation, additional or enhanced measures will be identified and implemented in accordance with national laws and ESS4 requirements.

1. Direct Financial Assistance and Cash Transfers

Based on the initial hazard and risk assessment, the in-person distribution of financial assistance may present significant health and safety risks to both project workers, or operators of micro- and small enterprises, and other recipients, particularly during disease outbreaks, epidemics, pandemics, or other biological emergencies characterized by high transmission rates and elevated mortality risks (e.g., COVID-19). In such circumstances, in-person distribution may be restricted or prohibited in accordance with applicable public health measures and government requirements.

To minimize direct contact and reduce the risk of disease transmission associated with crowding at distribution sites, financial assistance should, where feasible, be provided through electronic payments, online platforms, mobile money services, or direct bank transfers. Where in-person distribution remains necessary, appropriate infection prevention and control measures should be implemented.

In addition, prior to any distribution activity, the MFEM and VPMU and/or its implementing partners (including contractors, NGOs, and UN agencies) will undertake a site-specific health, safety, and security assessment, including an assessment of access routes and transportation conditions for both project workers and intended recipients. The assessment will identify potential hazards and risks associated with travel, site access, crowd management, disease transmission, security, and emergency response, and appropriate mitigation measures will be implemented before distribution activities commence.

Additional mitigation measures will include:

- Organizing payment or registration sites to avoid overcrowding.
- Providing clear information on schedules, eligibility, and procedures to minimize confusion and tension.
- Ensuring safe queuing, shaded waiting areas, drinking water, and priority access for vulnerable persons where feasible.
- Applying crowd management and security measures proportionate to the context.
- Ensuring staff involved in registration, verification, or payment are trained on respectful conduct, confidentiality, SEAH prevention, and grievance channels.
- Using digital or remote payment systems where feasible to reduce crowding and travel risks.
- Coordinating with local authorities to manage safety and orderly access at payment sites.

2. Relief Distribution and Public Health Supplies

For distribution of food, drinking water, hygiene supplies, household kits, agricultural inputs, PPE, first aid kits, risks may include crowding, manual handling injuries, contamination, disease transmission, unsafe storage, and exposure to biohazards.

Considering the specialized requirements and risks associated with the storage and distribution of medical supplies, pharmaceuticals, vector control supplies, vaccines, veterinary supplies, and cold-chain materials, procurement of such items will only be permitted where the PIU and/or its implementing partners can demonstrate the availability of secure storage facilities, trained personnel, adequate cold-chain and handling equipment, and appropriate management systems. No procurement of these items shall proceed until these arrangements have been verified and are operational.

Mitigation measures will include:

- Establishing organized distribution points with safe entry and exit routes.
- Implementing crowd control, queuing systems, and priority lanes for vulnerable groups.
- Providing PPE and hygiene measures for distribution workers.
- Training workers on safe lifting, handling, storage, and transport of goods.
- Ensuring medicines, vaccines, and cold-chain supplies are handled only by trained personnel.
- Maintaining safe storage for food, water, medicines, veterinary supplies, chemicals, and vector control materials.
- Preventing community exposure to damaged, expired, contaminated, or unsafe goods.
- Providing handwashing or hygiene facilities at distribution points, where feasible.
- Recording and reporting injuries, incidents, or security concerns.

3. Cash-for-Work and Community-Based Clean-Up

Cash-for-work activities may support debris clearance, site clean-up, and other early recovery works. These activities may expose workers and communities to debris, sharp objects, unstable structures, contaminated materials, weather hazards, fatigue, and unsafe manual handling.

Mitigation measures will include:

- Ensuring participation is voluntary and based on clear terms of engagement.
- Assigning community workers only to light, low-risk, non-hazardous tasks.
- Prohibiting community workers from heavy lifting, hazardous debris removal, electrical works, work at height, confined spaces, night work, machinery operation, or contaminated waste handling.
- Conducting task-specific orientation and daily safety briefings.
- Providing PPE such as gloves, boots, masks, helmets, and reflective vests, as relevant.
- Establishing safe working zones and excluding community members from hazardous areas.
- Providing drinking water, rest breaks, sanitation, and first aid.
- Monitoring hours of work to avoid fatigue and heat stress.
- Ensuring supervisors are present during activities.
- Prohibiting child labor and maintaining worker registers.

Cash-for-work activities may not be permitted during disease outbreaks, epidemics, pandemics, or other biological emergencies where participation could result in crowding, inadequate physical distancing, or other conditions that increase the risk of exposure to highly transmissible and potentially fatal infectious diseases (e.g., COVID-19). In such circumstances, activities that require the gathering of workers or beneficiaries may be suspended, postponed, modified, or replaced with alternative forms of assistance.

However, cash-for-work activities may be considered where the health event does not involve person-to-person transmission, or where the nature of the outbreak and prevailing public health conditions allow such activities to be implemented safely. Any such activities shall be subject to a site-specific health and safety risk assessment and the implementation of appropriate risk mitigation measures in accordance with applicable public health requirements and good international practice.

4. **Procurement, Logistics, Vehicles, Fuel, and Equipment**

Procurement and logistics activities may involve vehicles, fuel, water pumps, generators, heavy equipment, temporary facilities, and backup power systems. Risks include traffic accidents, fuel spills, fire, equipment malfunction, electrocution, noise, emissions, and community exposure to moving vehicles or machinery.

Mitigation measures will include:

- All procured equipment, vehicles, generators, machinery, and tools shall undergo adequate inspection and verification prior to acquisition and deployment to ensure that they are of suitable quality, certified for safety where required, covered by appropriate warranties, and compliant with applicable national standards.
- Equipment will be regularly inspected, properly maintained and operated to prevent excessive noise, air emissions, leaks, and other forms of pollution that may pose risks to workers, communities, or the environment.
- Requiring operators of vehicles and heavy equipment to be trained and licensed where applicable.
- Establishing traffic management measures, including speed limits, routes, spotters, and signage.
- Securing fuel storage areas and maintaining spill response materials.
- Installing generators and backup power systems in safe, ventilated, and restricted areas.
- Providing fire extinguishers near fuel, generators, and temporary power facilities.
- Prohibiting community access to equipment yards, fuel storage, and active operating areas.
- Ensuring safe loading, unloading, and manual handling practices.
- Recording equipment incidents, accidents, spills, near misses, and corrective actions.

5. **Debris Clearance, Repair Works, and Small-Scale Rehabilitation**

Works involving debris clearance, restoration of access, repair of damaged schools, health facilities, emergency shelters, roads, bridges, jetties, water, sanitation, and energy systems may create significant risks due to unstable structures, falling objects, electrocution, contaminated debris, heavy equipment, flooding, landslides, and public access to unsafe areas.

Mitigation measures will include:

- Preparing site-specific Health, Safety, and Community Safety Plans for works with material risks.
- Conducting site hazard assessments before work begins.
- Securing unsafe areas using fencing, barricades, signs, and access controls.
- Restricting high-risk tasks to trained and qualified workers.
- Ensuring work at height uses fall protection, guardrails, harnesses, or lifelines.
- Preventing throwing of materials from height and controlling falling object risks.
- Managing electrical hazards, including damaged power lines and temporary electrical systems.
- Providing PPE and task-specific tools.
- Ensuring safe excavation, lifting, and equipment movement practices.
- Maintaining emergency access and evacuation routes.
- Communicating site risks to nearby communities and restricting public entry to work zones.

The MFEM and VPMU shall ensure that all implementing partners, including contractors, prepare and implement site-specific Health and Safety Management Plans (HSMPs) for activities involving minor civil works, repair, rehabilitation, and debris clearance. These plans shall be commensurate with the nature and scale of the activities and shall identify potential occupational and community health and safety risks, together with appropriate mitigation, monitoring, emergency preparedness, SEAH risk management plan, and incident response measures.

VII. ELIGIBLE EVENTS SPECIFIC MEASURES

This is based solely on a preliminary risk assessment of activities listed under the eligible expenditure list, considering the nature of disasters and emergencies, and is not exhaustive. Where these measures are insufficient, or where more detailed information becomes available at the time of activation, additional or enhanced measures will be identified and implemented in accordance with national laws and ESS4 requirements.

1. Disasters Triggered by Natural Hazards

For cyclones, floods, earthquakes, landslides, volcanic events, tsunamis, or similar hazards, the main risks include unstable buildings, damaged roads, floodwaters, landslides, mudflow, ground instability (including aftershocks), falling debris, damaged utilities (e.g., downed or exposed power lines), exposure to hazardous substances or materials from debris or rubble, gas leaks, explosion, fire hazards, and disrupted access.

Additional measures will include:

- Hazard assessment of the site and transport routes prior to any activities
- Assessing structural stability before entering damaged buildings.
- Avoiding work in unstable slopes, flooded areas, or areas with electrical hazards until cleared.
- Establishing safe access routes and evacuation points.
- Coordinating with disaster management authorities on hazard information and restricted areas.
- Suspending activities during unsafe weather or aftershocks, where relevant.

2. Pollution or Contamination Events

For pollution, chemical spills, contaminated water, hazardous waste, or fuel contamination, the main risks include exposure to hazardous substances, unsafe waste handling, inhalation risks, skin contact, and contamination of community areas.

Additional measures will include:

- Identifying and isolating contaminated areas.
- Restricting access to trained personnel.
- Providing appropriate PPE and, where necessary, respiratory protection.
- Prohibiting community workers from handling hazardous or contaminated materials.
- Ensuring safe storage, transport, and disposal of hazardous waste.
- Coordinating with environmental and health authorities for technical guidance.

3. Health or Biological Emergency

For disease outbreaks, epidemics, pandemics, or biological emergencies, the main risks include infection transmission, exposure to medical waste, crowding, and unsafe handling of health supplies.

Additional measures will include:

- Applying infection prevention and control measures.
- Providing PPE appropriate to the health risk.
- Training workers on hand hygiene, respiratory hygiene, safe distancing where needed, and safe handling of medical supplies.
- Managing medical waste safely.
- Avoid in-person gatherings and situations that may result in crowding. In exceptional circumstances where distribution activities may be permitted, staggered distribution schedules, controlled attendance, and other appropriate measures shall be implemented to minimize crowding and reduce potential health and safety risks.
- Coordinating with health authorities on outbreak-specific requirements.

4. Food Crisis

For food insecurity or supply disruption, risks may include crowding, conflict at distribution points, spoilage, contamination, unsafe storage, and manual handling injuries.

Additional measures will include:

- Ensuring safe storage and handling of food supplies.
- Organizing distribution to avoid crowding and conflict.
- Prioritizing vulnerable groups through transparent procedures.
- Providing crowd management, shaded waiting areas, and drinking water where feasible.
- Monitoring food quality, expiry, and contamination risks.

5. Energy Crisis

For power disruptions, fuel shortages, generator use, or temporary power systems, risks may include electrocution, fire, fuel spills, carbon monoxide exposure, noise, and community access to unsafe power installations.

Additional measures will include:

- Installing generators in ventilated and secure locations.
- Restricting access to fuel, generators, cables, and electrical panels.
- Using trained personnel for electrical installation and maintenance.
- Providing fire extinguishers and spill response kits.
- Avoiding unsafe temporary wiring and overloading.
- Communicating risks to nearby communities.

6. Agricultural Pest or Animal Disease Outbreak

For agricultural pest outbreaks or animal diseases, risks may include exposure to pesticides, veterinary medicines, infected animals, contaminated materials, and unsafe disposal of animal waste or carcasses.

Additional measures will include:

- Ensuring pesticides, veterinary medicines, and vector control supplies are handled only by trained personnel.
- Providing PPE for handling chemicals, medicines, or animal-related materials.
- Preventing community access to treated areas, infected animals, or contaminated waste.
- Ensuring safe storage and disposal of chemicals, containers, and veterinary waste.
- Coordinating with agriculture, livestock, veterinary, and health authorities.

VIII. SEAH RISK MITIGATION MEASURES

1. Disrupted Social and Institutional Systems
    a. Establish and communicate clear Codes of Conduct with zero tolerance for SEAH.
    b. Maintain accessible and confidential reporting channels throughout emergency operations.
    c. Designate trained SEAH focal points and establish survivor-centered referral procedures.
    d. Integrate SEAH requirements into contractor agreements and worker inductions

2. Heightened Power Imbalances
    a. Separate beneficiary selection, aid distribution, employment decisions, and grievance handling functions where feasible.
    b. Apply transparent and documented procedures for beneficiary targeting, worker recruitment, and cash-for-work selection.
    c. Prohibit any exchange of aid, employment, goods, or services for sexual favors through Codes of Conduct and contractual requirements.
    d. Conduct regular oversight and spot checks of worker-community interactions

3. Increased Vulnerability of Affected Populations
    a. Prioritize engagement with women, persons with disabilities, displaced persons, and other vulnerable groups during stakeholder engagement activities.
    b. Ensure safe, accessible, and inclusive grievance and reporting mechanisms.
    c. Disseminate information on rights, available services, and reporting channels in culturally appropriate formats.
    d. Link survivors to available protection, health, psychosocial, and legal support services

4. Nature of Emergency and Early Recovery Activities
    a. Ensure adequate supervision of relief distribution, temporary shelter operations, community programs, and rehabilitation works.
    b. Avoid one-on-one interactions between workers and beneficiaries in isolated settings where practicable.

c. Require workers to follow professional conduct standards when interacting with communities.
d. Conduct regular awareness sessions on SEAH prevention for workers and communities.

5. Informal and Rapid Labor Mobilization
    a. Screen workers and contractors prior to engagement, consistent with emergency response requirements.
    b. Provide mandatory induction training on Codes of Conduct, SEAH prevention, and reporting obligations before deployment.
    c. Require all workers to acknowledge and comply with project Codes of Conduct.
    d. Ensure supervisors are trained to identify, prevent, and respond to SEAH risks.

6. Limited Awareness and Reporting Mechanisms
    a. Publicize SEAH reporting channels through community meetings, notice boards, temporary facilities, and communication materials.
    b. Provide multiple confidential reporting options, including anonymous reporting where feasible.
    c. Raise awareness among workers and communities regarding prohibited behaviors, survivor rights, and available support services.
    d. Protect complainants and survivors from retaliation, intimidation, or discrimination

7. Weak Monitoring and Oversight in Emergency Contexts
    a. Include SEAH monitoring indicators in project supervision and reporting arrangements.
    b. Conduct periodic site visits, spot checks, and worker interviews where access conditions permit.
    c. Require contractors and implementing partners to report SEAH incidents and compliance measures regularly.
    d. Promptly investigate and address allegations consistent with survivor-centered principles

8. Risks in Community-Based and Cash-for-Work Activities
    a. Apply transparent and documented criteria for worker selection, task allocation, and wage payments.
    b. Publicly disclose eligibility criteria, payment rates, and grievance procedures.
    c. Ensure equal opportunity and non-discriminatory participation of women and vulnerable groups.
    d. Monitor recruitment, supervision, and payment processes for potential exploitation, harassment, favoritism, or abuse.
    e. Maintain a dedicated grievance mechanism for workers and participants in community-based and cash-for-work activities

IX. INSTITUTIONAL RESPONSIBILITIES

The MFEM and VPMU will have overall responsibility for ensuring implementation of this Plan. This includes integrating health, safety, and community safety requirements into contracts, procurement documents, cash-for-work procedures, site-specific plans, and supervision arrangements.

Contractors and suppliers will be responsible for implementing health and safety controls for their personnel, equipment, vehicles, supply chains, and worksites. They will be required to designate qualified safety personnel appropriate to the scale and risk of activities.

Community workers engaged in cash-for-work or similar programs will be managed through clear terms of engagement, voluntary participation, task-specific orientation, basic PPE, supervision, and access to grievance and incident reporting channels.

The MFEM and VPMU will also coordinate, as necessary, with local authorities, health officials, disaster management agencies, labor authorities, community representatives, and service providers to manage risks to workers and affected communities.

Number of Safety Officers: The PIU will deploy one safety officer for every activity or site.

Deployment: The Contractor will deploy sufficient safety officers and safety-steward/Safety-supervisor, as per requirement given above, since initial stage and add more in proportion to the added strength in work force. Any delay in deployment will prompt the RRCP to order temporary suspension of works until the issue is resolved.

Qualification of Health and Safety Officer:

Designation	Qualification/Experience
Health and Safety Officer	• Minimum two years in the field of Health and safety. • Preferably with degree related to the assignment • With diploma or certification on health, safety and security issued by credible national or international institute
Health and Safety Supervisor for Project Workers	• Minimum two years' experience • Preferably with training on health, safety and security conducted by local or international institutes accredited by the country or reputable organization in health and safety.

Responsibilities of Health and Safety Officers/Supervisors:

- Engage qualified health and safety personnel, including safety officers and stewards, in accordance with applicable requirements.
- Adhere strictly to applicable H&S rules, procedures, and site-specific instructions, in coordination with site management and safety personnel.
- Screen all personnel for fitness, competence, and health requirements prior to engagement and periodically thereafter.
- Prohibit the engagement of persons below 18 years of age.
- Provide appropriate personal protective equipment (PPE) prior to commencement of work and ensure its proper use.
- Ensure that no person is required to lift or carry loads that may pose a risk to their health or safety.
- Ensure that all tools, plants, and equipment are tested, certified, and maintained in safe working condition by competent persons.
- Provide adequate welfare facilities at the site, including rest areas, washing facilities, drinking water, and sanitation.

- Follow site-specific operational control procedures and safety instructions at all times.
- Ensure safe work at height practices, including use of safety harnesses secured to lifelines or stable structures.
- Prevent unsafe practices such as throwing materials from height and ensure proper controls to avoid falling objects.
- Report all incidents, including near misses, promptly to designated supervisors or H&S personnel.
- Prohibit unsafe behavior at all project sites.
- Ensure that all project personnel conduct work in a manner that does not create risks to themselves, other workers, or affected communities.
- Display appropriate safety signage and information at worksites and areas accessible to the public.
- Conduct regular H&S audits, training, inductions, and emergency drills, and ensure cooperation with such activities.
- Plan and ensure timely provision of PPE, safety equipment, and other H&S resources in line with work schedules.
- Maintain good housekeeping to prevent accidents and minimize environmental and community risks.
- Provide and maintain fire prevention and firefighting equipment at worksites.
- Ensure adequate emergency preparedness and response arrangements, including for site personnel and surrounding communities.
- Establish site safety committees and ensure active participation in coordination and review of H&S performance.
- Provide adequate fencing or barriers for hazardous areas, including open edges, to protect workers and the community where permanent protections are not in place.

X. MONITORING, SUPERVISION, AND CORRECTIVE ACTIONS

The MFEM through VPMU will monitor implementation of this Plan through regular supervision, contractor reporting, site inspections, spot checks, review of incident logs, and consultations with workers and communities. Where access is constrained due to the emergency, adaptive monitoring may be used, including local focal points, remote reporting, photographic evidence, mobile communication, or coordination with local authorities.

Non-compliance will be addressed through corrective actions, including additional training, improved supervision, replacement of unsafe equipment, suspension of unsafe activities, or contractual remedies. If a contractor fails to implement necessary safety precautions or instructions, the MFEM/VPMU may require corrective measures and, where permitted under the contract, undertake corrective action at the contractor’s cost.

Incident and Accident Monitoring. The EA and VPMU shall establish procedures for recording, investigating, and reporting environmental and social incidents including health and safety incident and accidents associated with project activities. Particular attention shall be given to incidents involving:

(ix) Fatalities;
(x) Serious injuries;
(xi) Significant environmental contamination or pollution;
(xii) Major occupational health and safety events;
(xiii) Community health and safety incidents;
(xiv) GBV and SEAH allegations related to project activities; and

(xv) Significant security concerns, social conflict or community unrest related to the project.

All incidents should be investigated promptly, and corrective actions shall be implemented to prevent recurrence.

Incident Notification and Reporting. The EA shall notify ADB promptly of any project-related incident or accident that has, or is likely to have, a significant adverse effect on the environment, affected communities, workers, or the public. Initial notification shall include:

(i) Date, location, and nature of the incident;
(ii) Known or suspected causes;
(iii) Immediate response measures undertaken; and
(iv) Planned follow-up actions.

A detailed incident report shall subsequently be prepared and submitted to ADB within an agreed timeframe, including root cause analysis, corrective actions, responsibilities, and implementation schedules. Incident reporting and response procedures shall be consistent with applicable national requirements and ADB ESF requirements.

XI. MINIMUM REQUIREMENTS CHECKLIST

At a minimum, each activity will confirm the following before commencement:

- Activity screened for worker and community health and safety risks.
- Site hazards identified and controls established.
- Workers inducted and trained for assigned tasks.
- Community workers assigned only to low-risk, non-hazardous work.
- No person below 18 engaged.
- PPE provided and used.
- Drinking water, sanitation, rest area, and first aid available.
- Equipment inspected and certified, where required.
- Hazardous areas fenced, signed, or restricted.
- Traffic and public access risks controlled.
- Emergency contacts and evacuation arrangements in place.
- Incident reporting and grievance channels communicated.
- Community risks disclosed and managed.

ANNEX 5: SITE SELECTION SCREENING CHECKLIST

This screening checklist will be used to conduct a rapid assessment of proposed sites for temporary facilities and emergency shelters. The checklist is designed to identify and screen potential environmental and social (E&S) risks and impacts associated with the siting, of such facilities, and to exclude sites or activities that may result in significant, irreversible, or otherwise substantial and high E&S risks and impacts.

Screening Questions	Yes No N/A	Additional Description (Where applicable)
Is the site located in or near an area exposed to landslides, unstable ground, falling debris, wildfires, coastal hazards, riverbanks, flooding, or other natural hazards?		
Does the site provide safe, convenient, and barrier-free access for vulnerable groups, including persons with disabilities, older persons, pregnant women, children, and individuals with limited mobility?		
Is the proposed site free from hazardous materials, hazardous wastes, contaminated land, polluted soil, or other sources of environmental contamination that may pose risks to human health, safety, or the environment?		
Will the temporary facility be used as storage of medicine, pharmaceutical products, veterinary supplies, agricultural pesticides/insecticides, fuel, or any other hazardous materials and substances?		
Are there adequate and appropriately maintained sanitation facilities available at the site, including toilets, washing areas, and bathing facilities, sufficient to meet the needs of the intended users?		
Are there adequate, safe, and private facilities for women and girls, including designated spaces for changing clothes, sex-segregated sanitation and washing facilities, adequate lighting, and appropriate security measures, to help prevent and mitigate risks of sexual exploitation, abuse, and harassment (SEAH) and ensure the safety and dignity of women, girls, and children?		
Is the proposed temporary shelter expected to remain in use for more than 12 months?		
Is the site privately owned?		
Is the site currently occupied, used, cultivated, by any individual, household, or group?		
Does the site currently contain any standing crops, trees, livestock, poultry, aquaculture facilities, or other agricultural assets that may be affected by the proposed use of the site?		

Is the proposed site located within, adjacent to, or likely to affect a legally protected area, internationally recognized area, critical habitat, or other area of high biodiversity value?		
Is the site traditionally owned, used by Indigenous Peoples?		
Is the site adjacent to or part of a cultural heritage site?		
Has meaningful consultation and adequate information disclosure been conducted with affected communities and relevant stakeholders regarding the proposed site selection and use of the site?		