

**INTEGRATED SAFEGUARDS DATA SHEET
RESTRUCTURING STAGE**

Note: This ISDS will be considered effective only upon approval of the project restructuring

Report No.: ISDSR16174

Date ISDS Prepared/Updated: 15-Dec-2015

Date ISDS Approved/Disclosed: 17-Dec-2015

I. BASIC INFORMATION

1. Basic Project Data

Country:	Samoa	Project ID:	P128904
Project Name:	WS: Pacific Regional Connectivity Program: Phase 3 - Samoa (P128904)		
Task Team Leader(s):	Natasha Beschorner		
Estimated Appraisal Date:	23-Apr-2015	Estimated Board Date:	19-Jun-2015
Managing Unit:	GTI09	Lending Instrument:	Investment Project Financing
Sector:	Telecommunications (87%), Information technology (8%), Public administration- Information and communications (5%)		
Theme:	Infrastructure services for private sector development (90%), Regulation and competition policy (10%)		
Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?			No
Financing (in USD Million)			
Total Project Cost:	49.94	Total Bank Financing:	16.00
Financing Gap:	0.00		
Financing Source			Amount
BORROWER/RECIPIENT			5.76
IDA Grant			16.00
Asian Development Bank			18.50
Local Sources of Borrowing Country			8.18
Pacific Regional Infrastructure Facility Trust Fund			1.50
Total			49.94
Environmental Category:	B - Partial Assessment		
Is this a Repeater project?	No		

2. Current Project Development Objectives

3. Project Description

The Project is expected to finance a submarine fibre-optic cable linking Samoa (Savaii and Upolu) to Fiji (at the Southern Cross Cable Network at its landing station in Suva).

Project Components are as follows:

Component 1. Samoa-Fiji Cable, comprising the following:

Component 1 (a) Submarine cable system. Design, supply and installation of a submarine cable system to connect Samoa (Upolu and Savai'i) to Fiji (Suva), including undertaking a marine survey, financing the cable manufacture and cable deployment-marine operations.

Component 1 (b) Landing stations and ancillary equipment. Construction of landing stations and ancillary facilities in Savaii and Upolu, including acquisition and installation of onshore equipment.

Component 1 (c) Additional costs. Financing of Indefeasible Rights of Use (IRUs) (including the acquisition of long-term landing services in Fiji and capacity) and management costs associated with the operation of the SSCC.

Component 2. ICT Regulatory Technical Assistance. Carrying out a program of activities designed to enhance regulatory capacity of the Office of the Regulator, such program to include, inter alia: (a) review, development and implementation of effective regulation for the ICT sector with a particular focus on wholesale markets; (b) review (and update) of existing legal regulatory framework; and (c) carrying out a nationwide consumer survey on the benefits of ICT.

Component 3. Project implementation and administration. Carrying out a program of activities designed to strengthen the capacity of the Recipient for Project transactional implementation and management, such program to include: (a) Project finance and transactional assistance in connection with the institutional design and operationalization of the SSCC pursuant to public private partnership arrangements; including independent appraisal of the proposed structure of SSCC; (b) overall Project coordination, financial and contract management, procurement, communications and outreach plus reporting, audit, monitoring and evaluation.

Project Restructuring Update December 2015:

A Restructuring Paper has been prepared. The purpose of restructuring is to add Limited International Bidding (LIB) to the list of eligible procurement methods under the Project. This is in response to a request from the Project Recipient, Ministry of Finance, Samoa, dated November 17, 2015, for the use of Limited International Bidding (LIB) to procure a turnkey submarine cable system between Samoa and Fiji. The use of LIB as the selection method for this contract has also been agreed by the Project co-financier, the Asian Development Bank, as noted in the Memorandum of Understanding on co-financing and coordination arrangements for to the Project, dated October 28, 2015. No other changes are proposed under this restructuring.

The modifications proposed under this restructuring will not change the Project Development Objective (PDO), and the PDO will still be achieved with the activities being carried out under the Project components. No new activities are being proposed. There are no safeguards policies triggered by this change.

4. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

1. Component 1 involves laying approximately 1,300 km of submarine fiber optic cable between Suva, Fiji and the islands of Upolu and Savaii in Samoa, and installation of one cable station in Samoa. The preferred cable landing site in Apia (Upolu) is situated at Fagali'i where the existing Samoa/American Samoa (SAS) - American Samoa-Hawaii (ASH) cable landing site and beach manhole (BMH) owned by BlueSky. The existing cable on Upolu runs from the landing site to a cable station over waterways and is therefore extremely vulnerable to flooding, which compromises Samoa's connectivity. A new cable station will be installed, away from rivers and low lying areas, to maintain the integrity of Samoa's communications system. A hardened duct is expected to be installed within the public road reserve from BMH. The anticipated route is eastwards for 2.2km along the Main East Coast Road, northward on Golf Course Road and then Plantation Road to a designated site (approximately 100-200sqm) on government-owned land at the Samoa Royal Golf Course, in an elevated area not vulnerable to flooding. A sublease arrangement is being pursued for a small demountable building that will secure the telecommunication plan and backup power equipment (containing diesel generator, batteries, etc).

2. The Project includes a spur to Savai'i, where a duct and beach manhole (BMH) will be constructed. This option enables the utilisation of a gap in the reef through which to bring the cable toward the shore. The most suitable landing site for the cable is on government land at the Malietoa Tanumafili II hospital in Tuasivi. A duct will extend from the newly constructed BMH (approx 1sqm) behind the chapel and along the road reserve to the existing BlueSky cable station. An additional 600mm rack will be installed inside the existing BlueSky cable station adjacent to the hospital.

3. In Fiji, the landing point will be the existing Vatuwaqa Communications Centre in Laucala Bay, Suva, the termination point for Southern Cross, Tonga and Vanuatu cables. There is capacity at the existing landing site and cable station operated by FinTel to accommodate an additional cable from Samoa and no major construction is necessary. Only short-term minor shoreline disturbance will be necessary to install the cable to the duct at the BMH. FinTel and the Samoan Submarine Cable Company will sign a landing party agreement which will be submitted to the Fijian Government, and FinTel will provide space within existing facilities for the connection. The IEE/ESIA includes a due diligence assessment of this landing station (Appendix 5)

4. The main activities will be:

- (i) a marine bathymetric survey to characterise the route (1-10km study corridor) to avoid known environmentally significant areas and other features with potential design or cable integrity implications such as canyons, seamounts and hydrothermal vents;
- (ii) detailed design of the submerged infrastructure – the cable and repeaters. This will determine the cable route, cable types and quantities, and clarify the nature of its deployment on the seafloor – surface laying, or trenching and burial, supplementary protection, etc.
- (iii) construction of a BMH (approx 1sqm) at Tuasivi on Savai'i to land the cable at the Malietoa Tanumafili II hospital.
- (iv) cable laying – the cable will be buried in the shallow water approaches to the landing sites and surface-laid along the deep water route. In most cases the cable will lie directly on the seabed. Near shore areas will require the cable to be buried up to one metre (by sea plough or hydro-jetting methods) to protect it from damage.

The Project will use the applicable safeguards policies of the World Bank (see triggered safeguard policies below) and Asian Development Bank (Safeguard Policy Statement, 2009). The safeguards process has built upon the implementation experience of the recently-commissioned Tonga-Fiji cable where no adverse social or environmental impacts were experienced during marine operations or landing at Suva or Nuku'alofa.

The safeguard instruments for this project were modelled on those prepared for the recently approved Federated States of Micronesia to Palau cable, which was also co-financed by the World Bank and Asian Development Bank, with improvements being made to instrument structure and clarity to further improve project delivery. The World Bank, in consultation with the Asian Development Bank, will take primary responsibility for review and clearance of safeguards instruments to ensure compliance with the safeguard policies of the two institutions..

5. Environmental and Social Safeguards Specialists

Nicholas John Valentine (GENDR)

Ross James Butler (GSURR)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	This Project will finance the laying of a submarine fiber-optic cable system, with associated marine and land based infrastructure between Samoa and Fiji. The project influence area (PIA) includes terrestrial and marine environments in Samoa and Fiji. Potential adverse environmental impacts may include temporary site-specific disturbance of marine ecosystems (including habitats and species) and coastal areas and communities during installation and maintenance of the cable, and construction of the land and marine based infrastructure, which are expected to be temporary and readily manageable. The Project has been assigned a category "B" consistent with the anticipated nature of these impacts and the requirements of OP4.01. An Initial Environmental Examination (IEE) which corresponds with the Bank's Environmental and Social Impact Assessment (ESIA) requirements and associated Environmental and Social Management Plan (ESMP) has been prepared by the Government to address these issues in Samoa and Fiji.
Natural Habitats OP/BP 4.04	Yes	The IEE/ESIA report identified that marine protected areas did exist in Fiji and Samoa, but these were not in close proximity to the proposed cable route. The report identified that sensitive marine habitats (eg. Seagrass, coral and mangroves etc) exist in the vicinity of potential project impact areas (PIAs), however that these habitats do not exist close to the landing sites. Given the design flexibility available elsewhere along the routes, these habitats can be readily avoided. The ESMP provides management measures to ensure full compliance with this policy, and relevant national and international laws,

		treaties and other obligations. The key mitigation measure will be avoidance of natural habitats through appropriate detailed design. The final design (including routing) and associated contractors ESMP will be submitted for Bank approval prior to commencement of works.
Forests OP/BP 4.36	No	The project infrastructure will not impact on forests.
Pest Management OP 4.09	No	The project will not include pest management.
Physical Cultural Resources OP/BP 4.11	Yes	The ESIA/IEE concluded that Physical Cultural Resources (PCRs) do not exist within the PIA. As two of the three landing sites are at existing facilities (and hence will not require new infrastructure) PCRs are unlikely to be relevant. Regardless, a Chance Find Procedure is contained in the ESMP and be included in works contracts.
Indigenous Peoples OP/ BP 4.10	No	A country-level social analysis has been completed as part of preparation of the Environmental and Social Safeguard Procedures for the Pacific Island Countries. This analysis looked at the applicability of OP 4.10 in each PIC based on four criteria. OP 4.10 defines Indigenous Peoples based on four characteristics: (i) self-identification as members of a cultural group, (ii) collective attachment to habitats/territories, (iii) customary institutions, (iv) and indigenous language. All four characteristics must be present to trigger the policy. In Samoa, virtually all of the population is ethnic Samoan and there are no significant ethnic cleavages among them; therefore, they do not self-identify as members of a distinct indigenous cultural group within their own country. Similarly there are no customary cultural, economic, social or political institutions that are separate from the dominant society and culture because they are the dominant society and culture. There also is no indigenous language different from the official language of the country. Based on this analysis, OP 4.10 is not typically triggered in Samoa. Despite the absence of some of the key criteria, because of the relatively high salience of ethnic identification and inter-ethnic relationships in Fiji, the Policy may be triggered in Fiji under certain circumstances. However given that there are no impacts affecting land or shared resources, OP4.10 will not be triggered in Fiji.
Involuntary Resettlement OP/BP 4.12	Yes	Two of the three landing sites are at existing cable landing stations. New infrastructure includes installation of ducts in narrow channels to connect the cable to landing sites and cable stations (30cm width and 1m deep approx). Based on due diligence, all land for duct routes is expected to be government-owned including public road

		reserves, the hospital in Savaii and Royal Samoa Golf Course at Fagalii near the domestic airport. The landing site at Suva is currently under Crown lease to FinTel and no additional land will be required. The IEE/ESIA identified two fishing reserves in proximity to landing sites in Samoa, and two in Laucala Bay at the Fiji end. The IEE/ESIA includes consideration of social issues including whether there are any potential impacts to customary rights over near shore areas. Any potential impacts are anticipated to be extremely limited, very short term in nature (i.e. one day) and can be mitigated through providing adequate notification to nearby fishers and villages. An RPF has been included as part of the IEE/ESIA to address issues which may emerge during detailed design including (i) use of a site other than the hospital site in Savai (which is considered by the IEE); (ii) any impacts on streetside stalls, trees or other livelihood implications as a result of the communication ducts. .
Safety of Dams OP/BP 4.37	No	The project scope does not include dams.
Projects on International Waterways OP/BP 7.50	No	The project entails construction of a submarine cable between the territorial waters (ocean) of Samoa and Fiji. However, these water bodies do not form a boundary between countries.
Projects in Disputed Areas OP/BP 7.60	No	There are no disputed areas within the scope of project implementation.

II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the Restructured project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The project influence area (PIA) includes terrestrial and marine environments in Samoa and Fiji. Potential adverse environmental impacts may include temporary site-specific disturbance of marine ecosystems (including habitats and species) and coastal areas and communities during installation and maintenance of the cable, and construction of the land and marine based infrastructure, which are expected to be temporary and readily manageable.

Two of the three landing sites are at existing cable landing stations. New infrastructure includes installation of ducts in narrow channels to connect the cable to landing sites and cable stations (30cm width and 1m deep approx). Based on due diligence, all land for duct routes is expected to be government-owned including public road reserves, the hospital in Savaii and Royal Samoa Golf Course at Fagalii near the domestic airport. The landing site at Suva is currently under Crown lease to FinTel and no additional land will be required.

The IEE identifies that sensitive marine habitat (eg. Seagrass, coral and mangroves etc) exist in the

vicinity of potential project impact areas (PIAs), however that these habitats do not exist close to the landing sites. Given the design flexibility available along the routes, these habitats can be readily avoided.

The submarine cable will be buried in shallow water approaches to the landing sites and will be surface-laid on the seabed along the deep water route. Cable installation has the potential for some disturbance in near shore environments where burial techniques are employed and where the cable route passes through coral reef environments; however surface-laid sections in deeper water are unlikely to cause any significant impact.

The Project will take into account the implementation experience of the recently-commissioned Tonga-Fiji cable, co-financed by the World Bank and Asian Development Bank. No adverse social or environmental impacts were experienced during marine operations or landing at Suva or Nuku'alofa, and no major adverse or irreversible impacts are expected for Samoa or Suva.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

The Project will only result in temporary environmental impacts during construction phase. No indirect or long term impacts are anticipated based on the experience of similar Bank funded cable projects in the region. Direct impacts resulting from construction activities for the Project will be minimal, localised to near-shore areas where the cable is landed, and easily mitigated as guided by the ESMP.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

The ESIA/IEE considered alternative routes in nearshore areas for landing sites. The selected sites and routing were assessed and chosen based on economic, technical and environmental grounds. Route options will be further analyzed during the detailed design stage which will be further informed by a marine bathymetric survey and more detailed technical input.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

An Initial Environmental Examination (IEE) which corresponds with the Bank's Environmental and Social Impact Assessment (ESIA) requirements and associated Environmental and Social Management Plan (ESMP) has been prepared by the Government. The exact cable route will be determined by a detailed marine bathymetry survey at the design stage to characterise the route to avoid environmentally significant areas (where known) and other features with potential design or cable integrity implications such as canyons, seamounts and hydrothermal vents. The route selection and use of Government owned land will also reduce any potential land or livelihood impacts.

An RPF has been included as part of the IEE/ESIA to address issues which may emerge during detailed design including (i) use of a site other than the hospital site in Savai (which is considered by the IEE); (ii) any impacts on streetside stalls, trees or other livelihood implications as a result of the communication ducts.

A PMU located in MoF will have overall responsibility to ensure safeguard compliance in the preparatory phase and will work in collaboration with key agencies with regard to safeguard requirements. MoF has experience with ADB and World Bank projects and safeguard requirements. The Ministry of Communications and Information Technology (MCIT) is the lead

<p>agency for communications networks and infrastructure in Samoa. MCIT previously delivered the Samoa National Broadband Highway (SNBH) Project and worked with LTA, PUMA and other agencies for the installation of cable stations and duct routes on government land. Although the ministry faces some capacity constraints, MCIT has relevant experience in gaining development consent and approval for similar infrastructure developments and Samoa has competent environmental compliance staff (MNRE's PUMA) with adequate capacity to fulfil their role in project delivery.</p>
<p>5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.</p>
<p>Consultations were undertaken with various stakeholder groups (potentially affected communities etc) and documented in the IEE/ESIA report. Consultation on the Project took place in Samoa in March 2015 with key stakeholder groups and villages in proximity to landing sites to inform the IEE/ESIA process and assessment (including confirmation of preferred site locations). Only key stakeholder consultation was undertaken by MCIT and FinTel in Fiji (not community consultation) regarding the Suva landing site since there will be extremely minor works required. Consultation was carried out in March 2015 with the key Government agencies which FinTel deals with on a regular basis in respect of various cables it manages.. Further consultations with targeted stakeholders will be led by FinTel and MCIT regarding development consent, permits for construction activities, formal public notification of Project activities and to secure formal land leasing and subleasing agreements. The details of these consultations are documented in Annex 2 of the IEE/ESIA. The IEE/ESIA outlines grievance procedures adhering to cultural formalities in Samoa, Code of Environmental Practice 3 (COEP3) and World Bank public consultation and information disclosure requirements. The IEE/ESIA report and ESMP has been disclosed locally in Samoa and also via the World Bank's Infoshop in April 2015.</p>

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other	
Was the document disclosed prior to appraisal?	
Date of receipt by the Bank	09-Apr-2015
Date of submission to InfoShop	10-Apr-2015
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	00000000
"In country" Disclosure	
Fiji	16-Apr-2015
<i>Comments:</i>	
Samoa	10-Apr-2015
<i>Comments:</i>	
Resettlement Action Plan/Framework/Policy Process	
Was the document disclosed prior to appraisal?	
Date of receipt by the Bank	09-Apr-2015
Date of submission to InfoShop	10-Apr-2015
"In country" Disclosure	
Samoa	13-Apr-2015
<i>Comments:</i>	

If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.
If in-country disclosure of any of the above documents is not expected, please explain why:

C. Compliance Monitoring Indicators at the Corporate Level

OP/BP/GP 4.01 - Environment Assessment	
Does the project require a stand-alone EA (including EMP) report?	Yes [] No [] NA []
OP/BP 4.04 - Natural Habitats	
Would the project result in any significant conversion or degradation of critical natural habitats?	Yes [] No [] NA []
If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?	Yes [] No [] NA []
OP/BP 4.11 - Physical Cultural Resources	
Does the EA include adequate measures related to cultural property?	Yes [] No [] NA []
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes [] No [] NA []
OP/BP 4.12 - Involuntary Resettlement	
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes [] No [] NA []
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [] No [] NA []
Is physical displacement/relocation expected?	Yes [] No [] TBD []
Provided estimated number of people to be affected	
Is economic displacement expected? (loss of assets or access to assets that leads to loss of income sources or other means of livelihoods)	Yes [] No [] TBD []
Provided estimated number of people to be affected	
The World Bank Policy on Disclosure of Information	
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [] No [] NA []
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes [] No [] NA []
All Safeguard Policies	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [] No [] NA []

Have costs related to safeguard policy measures been included in the project cost?	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]

III. APPROVALS

Task Team Leader(s):	Name: Natasha Beschorner	
<i>Approved By</i>		
Safeguards Advisor:	Name: Peter Leonard (SA)	Date: 16-Dec-2015
Practice Manager/ Manager:	Name: Tenzin Dolma Norbhu (PMGR)	Date: 17-Dec-2015