



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 12/02/2020 | Report No: ESRSA01188



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Fiji	EAST ASIA AND PACIFIC	P175206	
Project Name	Fiji Social Protection COVID-19 Response and System Development Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Protection & Jobs	Investment Project Financing	11/17/2020	2/25/2021
Borrower(s)	Implementing Agency(ies)		

Proposed Development Objective

To mitigate the impact of the COVID-19 crisis on the income of the unemployed and underemployed, and to increase efficiency and adaptability of the social protection system.

Financing (in USD Million)	Amount
Total Project Cost	50.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

Yes

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The proposed project will support cash transfers to the unemployed and underemployed affected by COVID-19 and strengthen the social protection system and the relevant policy setting in Fiji. The proposed project will consist of two components: Component 1: Cash transfers to the unemployed and underemployed affected by COVID-19. This component will support cash transfers in the form of government top-ups to the Fiji National Provident Fund (FNPF) members who have lost their jobs or face reduced hours or reduced wages as a result of the COVID-19 crisis and who have insufficient balance in their FNPF General Account. Component 2: Institutional strengthening will focus on strengthening the Fijian social protection delivery system and the relevant policy setting. Activities under this component will help the government to build an integrated system for identifying and providing necessary support to vulnerable populations not covered by social assistance benefits but may need support in the event of economic or



natural covariate shocks. It would focus on workers in the informal economy as well as near-poor groups more broadly. Building a stronger social protection delivery system will enable a higher degree of flexibility to adapt to future emergencies, including natural disasters. The proposed project will also support monitoring and evaluation and project management.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The Republic of Fiji is a small island nation that is nevertheless home to one of the most sophisticated economies among the Pacific Islands. The country has an estimated population of 880,000, distributed across an area of 18,000 square kilometers spread over 330 islands, of which about 110 are inhabited. The majority of the population lives on two large islands, Viti Levu and Vanua Levu. Although Fiji is one of the most remote countries in the world, it is a regional hub for Pacific Island states and plays a major role in services in the region.

As a result of its economic prosperity, Fiji has one of the lowest rates of extreme poverty and inequality in the Pacific. The economy is the second largest in the Pacific after Papua New Guinea, and the most industrially advanced, with substantial services and manufacturing sectors. Unlike many other Pacific Island nations, it has developed a major tourism industry, which attracts over 750,000 tourists a year and contributes about 38 percent of Gross Domestic Product (GDP). The latest available data (from 2013) shows that just 1.4 percent of people in Fiji lived in extreme poverty, or under the US\$1.90 per day international poverty line.

Fiji is facing economic headwinds as a result of the double crisis of Cyclones Winston in 2016 and Harold in 2020, and the economic impact of the COVID-19 pandemic. Fiji's has suffered frequent natural disasters; the country's vulnerability to climate change has caused estimated loss of 2.5 percent of GDP every year (World Bank 2017). The COVID-19 pandemic has been a further blow. Although there have been no significant health impacts as of yet with a total of 32 confirmed cases and two confirmed deaths, the economic impact of the pandemic has been devastating. The tourism industry is at a virtual standstill and the Government expects the economic contraction to be 21.7 percent of GDP and a rise in Cash Transfer to 27 percent, the most severe contraction in Fiji's history. The recession's impact is likely exacerbated by declining remittances, with 24 percent of the bottom quintile indicating that they receive remittances (World Bank 2020). The pandemic's impact will severely impact the 20 percent of households with livelihoods directly linked to the tourism and hospitality sectors (data as of 2013), the recession will also impact household indirectly associated to the sector.

This Environmental and Social Review Summary is focused on the Fiji Social Protection COVID-19 Response and System Development Project (the Project). The Project Development Objective is to mitigate the impact of the COVID-19 crisis on the welfare of the unemployed and to strengthen the social protection delivery system to be efficient and adaptive. The proposed project is aligned with the WBG's COVID-19 Crisis Response Approach Paper and its strategic objectives.

The Project is comprised of the following two components:

Component 1: Provide cash transfers to those made unemployed or underemployed by COVID-19 (USD 45 million). This component will support cash payments to Fiji National Provident Fund (FNPF) beneficiaries who have lost their



jobs or face reduced hours or reduced wages in the formal sector as a result of the COVID-19 crisis and Cyclone Harold. The rapid financing of this component will be disbursed against the expenses for cash transfers paid to three groups of beneficiaries under FNPF: (a) one-time benefits of up to FJD 1,000 to tourism sector workers and up to FJD 500 to those affected by lockdown restrictions; (b) recurring payments of up to FJD 220 per fortnight for those who have become unemployed during the COVID-19 crisis; and (c) recurring payments of up to FJD 220 per fortnight for those who have been on reduced hours or reduced wages during the COVID-19 crisis with a tentative allocation of USD 6.5 million. Note, the component will involve retroactive financing of cash transfers while also allowing the government to extend the timeframe for support.

Component 2: Institutional strengthening (USD 5 million). Component 2 will focus on strengthening the Fijian social protection delivery system and the relevant policy setting. Activities under this component will enable efficient and timely targeting of existing groups supported by social assistance benefits, as well as the inclusion of other groups of people heavily hit by COVID-19, focusing on workers in the informal economy as well as near-poor groups more broadly. The component will finance TA activities, study tours, workshop and consultative activities, the procurement of office equipment, hardware and software, as well as project management and monitoring and evaluation activities of the project.

Subcomponent 2.1 will finance (i) TA to support development of an integrated Adaptive Social Protection Strategy in Fiji; ii) ensure specific design to address gender inequalities in social protection programs participation, including the design of a comprehensive grievance mechanism (GM) for gender-based violence (GBV) enabling the effective implementation of the government's action plan outlined in the Gendered Impacts of COVID-19 in Fiji; and (iii) activities to strengthen data sharing protocols (i.e. develop, adopt, and implement registry data governance framework, which will define principles, procedures, and responsibilities for data management following good practices in data privacy) and eventually system interoperability with other SP systems based on a unique identifier.

Subcomponent 2.2 will finance consultancies to provide TA for strengthening and developing social protection delivery systems in Fiji through the following activities:

(a) Enhancement of Department of Social Welfare's (DSW) existing delivery systems: TA will be provided to strengthen the linkages required with the ongoing DSW reforms and the development of the inter-government Adaptive Social Protection (ASP) strategy. The TA will include (i) a technical report on necessary changes in DSW SOPs to correspond to the ASP strategy; (ii) enhancement of information systems through procurement of office equipment and hardware and software to link with other SP systems and disaster risk management systems; and (iii) training provided to DSW staff in ASP systems. The TA will include financing for a resident in-house advisor, to be based in the Ministry of Women, Children and Poverty Alleviation (MWCPA) and provide coordination and technical assistance for activities in Subcomponents 2.1 and 2.2.

(b) Strengthening the capacity of the National Employment Centre (NEC) including a comprehensive review (functional areas, business processes, expenditures) of NEC with a special focus on existing incentives to register both vacancies and jobseekers, as well as a rapid evaluation of existing programs administered by NEC. It will also develop a report including recommendations on possible interventions (outreach activities, job-search assistance, career counseling, improved private sector partnerships) to improve matching of registered jobseekers with vacancies; as well as the development of a management information system (MIS) to support improved delivery of employment support programs.

(c) Strengthening the impact and sustainability of FNPF cash transfers: The TA will comprise of (i) a technical report to include recommendations for improved targeting of beneficiaries; and (ii) a feasibility study – including an



actuarial assessment and implementation roadmap for reforms towards a new Cash Transfer Benefit scheme to be introduced in Fiji;

(d) Strengthening the design and implementation of temporary employment program including (i) a rapid assessment of the ongoing Stronger Together intervention and a report incorporating lessons learned and recommendations for subsequent phases; and (ii) an operational manual to support the implementation of upcoming program implementation phases, including specific design inputs to strengthen a gender-inclusive implementation approach.

(e) Strengthening the delivery of self-employment and entrepreneurship support programs comprising of (i) a rapid assessment of the concessional loan scheme implemented by Ministry of Commerce, Trade Tourism and Transport (MCTTT) and a report incorporating lessons learned and recommendations; and (ii) trainings for MCTTT staff on improved delivery and monitoring of self-employment and entrepreneurship support programs provided in the context of COVID-response.

Subcomponent 2.3 will finance monitoring & evaluation and project management including the establishment and operation of an effective project management unit (PMU) and strengthening the capacity of MOE to implement the proposed project.

D. 2. Borrower's Institutional Capacity

The project institutional and implementation arrangements will harmonize and coordinate activities across various agencies. The arrangements will include a Steering Committee (SC) with the participation of multiple institutions with the Ministry of Economy as the leading implementation agency, and a Project Management Unit (PMU) joined by other implementation partners, including the Ministry of Women, Children and Poverty Alleviation (MWCPA), Ministry of Employment, Productivity and Industrial Relations (MEPIR), National Employment Centre (NEC), Ministry of Commerce, Trade, Tourism and Transport (MCTTT).

The SC will address the cross-institutional nature of the project. It will be led by the Permanent Secretary of MOE and consist of the heads of implementation partners and representatives from the private sector. The SC will provide policy direction and guidance, facilitate the coordination among various agencies and programs, and help address the bottlenecks for project implementation. They will meet regularly to discuss the policy and implementation issues and carry out field visits as necessary.

The MOE will take the overall responsibility for the project implementation and coordination. They will set up and operate the PMU in an efficient, effective and inclusive manner. The PMU will be responsible for the day-to-day work on project management, coordination, financial management, procurement, monitoring and reporting, and environmental and social (E&S) risk management. The MOE will assign/hire a project director and other key positions from relevant business units and other implementation partners can nominate technical coordinators to join the PMU. The MOE will recruit a part-time designated international E&S specialist no later than 60 days after the Effective Date to oversee coordination and implementation of E&S commitments as per the Environment and Social Commitment Plan (ESCP) and one or more E&S officer(s) no later than 30 days after the Effective Date from the Climate Change Department will be assigned to support the E&S Specialist. The E&S Specialist will have previous experience working with development agencies (ideally with the World Bank) and a key component of their role will be to build capacity of the supporting Climate Change Department E&S officer(s).

Fiji has relatively strong institutions and a reputation for a disciplined and well-educated civil service and pays for about 80 percent of its spending out of tax revenue. Fiji has recruited domestic and international experts to the public



service on performance contracts and paid for them without donor support. According to traditional global indicators of governance, Fiji ranks relatively high on political stability and control of corruption. It has also shown it can develop and put in place significant reforms quickly when necessary and can adopt appropriate policies for the country.

Nonetheless, MOE and the implementation partners are new to World Bank IPF projects and not familiar with the World Bank project policies and procedures including the Environment and Social Framework (ESF). In view of the diverse technical and implementation capacity of the implementation partners, the risk of project implementation is considered substantial. The PMU will help mitigate the risk by securing key positions and allocating adequate time on project management. The SC will oversee the project implementation and address bottleneck issues. The World Bank Task Team will provide implementation support to the PMU, MOE and other implementation partners. Capacity building for PMU staff will be carried out throughout the project implementation.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The environmental risks are considered Moderate. The environmental risk rating relates to potential downstream impacts associated with the outputs from Component 2 TA activities. Component 1 is not expected to have any environmental impacts as it solely involves cash transfers to those made unemployed or underemployed by COVID-19. Cash transfers will be deposited into beneficiary bank accounts.

Component 2 will finance consultancy activities, study tours, workshops, consultative activities and the procurement of office equipment, hardware and software, as well as project management and monitoring and evaluation activities. The TA activities under Subcomponent 2.1 and 2.2 will include outputs that support cash-for-works interventions and employment support programs. The resulting interventions and programs (that will not be financed by the Project) have the potential to introduce downstream environmental impacts. For example, if a TA output such as a manual was used to support a cash-for-works program that finances workers to complete minor civil works such as road maintenance.

In order to prevent and mitigate against potential downstream impacts associated with recommended cash-for-works interventions and employment support programs, the E&S Specialist/Officers will: (i) screen TA activities to ensure that they will not support downstream impacts included in the Environment and Social Commitment Plan (ESCP) Exclusion List and reflect key E&S aspects and risks and mitigation measures including ESF and relevant Fiji legal and good international industry practice (GIIP) requirements in consultancy terms of reference (TOR); and (ii) review TA outputs to ensure compliance with ESF and relevant Fiji legal and GIIP requirements. World Bank E&S Specialists will review consultancy TORs and Component 2 outputs to provide a No Objection prior to finalization to ensure compliance with ESF and relevant Fiji legal and good international industry practice (GIIP) requirements.

The procurement of hardware will ultimately result in the generation of e-waste. To address this impact the Project will prepare a waste management plan based on ESF, Fiji legal and GIIP requirements.

Public Disclosure



The potential environmental risks and impacts are expected to be predictable and readily managed through project design recommendations and mitigation measures. This ESRS is based upon a due diligence exercise performed by World Bank ES specialists. Further details of the due diligence are provided in the next section, 'Social Risk Rating'.

Social Risk Rating

Moderate

The social risks are considered moderate. The Project is expected to have immediate and medium term positive social impacts for the Fijian working population and dependents; including vulnerable and marginalized groups participating in the formal and informal labor market. Social risks and impacts are expected to be predictable and readily managed.

Environmental and Social Due Diligence was undertaken by WB E&S Specialists in accordance with the ESF 'Objectives and Principles' p.3 para 3-6 and 'Environmental and Social Due Diligence' p.7 para 30-35. The WB Due Diligence included a review of laws, acts, policies, protocols, systems and processes relating to the existing Cash Transfer (unemployment) scheme and a review of public forums and social media platforms. Meetings and interviews were held with key informants (government ministry staff, scheme users, FNPF staff).

Scope: The due diligence considered all relevant direct, indirect and cumulative environmental and social risks and impacts of the project, including retroactive, future and downstream impacts addressed by the ESF. A summary has been included in this ESRS. It is noted that the majority of funds under Component 1 will be allocated to retroactive financing for cash transfers.

Component Overview: Component 1 will provide cash transfers to formal workers made unemployed or underemployed due to COVID19. The Component involves both retroactive and future financing to the existing cash transfers scheme which is run by the Fiji National Provident Fund (FNPF). Fijian formal workers are members to the FNPF by law. Component 2 focuses on employment and self-employment support for informal workers, underemployed, near-poor and women and will finance TA activities supporting social protection strategy development, strengthening the social protection delivery systems and monitoring and evaluation. Subcomponent 2.1 and 2.2 will include outputs that support recommendations for cash-for-works interventions and employment support programs.

Due Diligence findings: Approximately 20 potential risks and impacts were considered. The analysis found no risk associated with exclusion or lack of access to project benefits for the targeted recipients, including disadvantaged or vulnerable people. There are no limitations or restrictions to membership based on gender, age, race or any other category as all formal workers are enrolled in FNPF by law. The analysis also finds no risk associated with lack of information and opportunity for meaningful engagement. The Cash Transfer scheme is inclusive and widely advertised across Fiji, stakeholders can provide feedback through multiple platforms.

Potential social risks associated with Component 1 include the risk that i) misinformation spreads about the cash transfer scheme, ii) gender-based violence (GBV) could increase for women project beneficiaries, iii) COVID-19 transmission between project workers and the general population, and iv) downstream social impacts as a result of the TA outputs.

In order to prevent and mitigate these potential risks the ESCP states that the Project will i) implement the Stakeholder Engagement Plan, which calls for a widespread, ongoing and comprehensive information campaign about the Cash Transfer scheme, ii) explicitly address gender inequalities in social protection program participation and



develop supports for managing GBV, sexual exploitation and abuse or sexual harassment through development of the Social Protection Strategy for Fiji, iii) produce and implement a COVID19 safety protocol and iii) ensure all TA TORs, recommendations and outputs comply with ESF and relevant Fiji legal and GIIP requirements. World Bank E&S Specialists will review consultancy TORs and outputs to provide a No Objection prior to finalization. The potential downstream social risks and impacts are expected to be predictable and readily managed through the project TA design recommendations and mitigation measures.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

ESS1 is relevant to the Project. The E&S risks are moderate. Analysis of the Project’s potential E&S risks and impacts was completed by WB Specialists who performed a due diligence exercise as described above in section A. Environmental and Social Risk Classification. The findings of the Due Diligence are summarised below, and outline 1) key risks and impacts analysed and deemed not relevant to the project, 2) the five relevant project risks and impacts to be mitigated and 3) the project’s E&S risk mitigation measures.

(1) Several E&S risks and impacts were deemed not relevant to the project during the WB Due Diligence. By way of example three key risks examined and excluded as a result of WB due diligence include: (1.1) the risk that eligible disadvantaged or vulnerable people will be excluded or cannot access the cash transfer scheme, (1.2) the risk that project information is not given in a timely, relevant, understandable, transparent and accessible manner and (1.3) the risk that information is not culturally appropriate, available in appropriate languages and given in a manner free of manipulation, interference, coercion, discrimination and intimidation.

Potential risk 1.1 is deemed not relevant for Component 1 because all eligible beneficiaries are already enrolled in the scheme by default. In Fiji, all formal workers are registered in the FPNF by law, the FPNF is a pension scheme. As such, there is no discrimination in enrollment for formal workers by age, gender, disability, or any other category. Further analysis details included in Preliminary SEP section 2.4 para 9. For Component 2, the TA output will integrate the ESF and relevant Fiji legal and GIIP requirements as per the ESCP.

Potential risk 1.2. Analysis of existing information sharing and options for contacting both the MOE and the FPNF highlight that the project has a robust, inclusive and comprehensive stakeholder communications engagement approach. Information is frequently updated, questions are responded to through the toll-free lines, at offices and in workshops. FPNF clients are actively raising questions and concerns on the FPNF Facebook website with responses coming back in a timely manner.

Potential risk 1.3. No incidence of manipulation, interference, coercion, discrimination and intimidation were identified in any of the public correspondence. FPNF have an active ‘Whistle Blower’ line where people can report incidents in an anonymous way. While English is widely spoken in Fiji (99.2%), the FPNF unemployment benefit scheme online application form has also been translated into iTaukei and Hindi as has the mobile app. English, iTaukei and Hindi speakers are available via the toll free line in FPNF. Information platforms identified for the cash



transfer (including with respect to retroactive financing) include: electronic and digital media: MOE (Government) and FNNP websites; MOE (Government) and FNNP Facebook page; TV; Radio; Webinars; FNNP Mobile Application Email distribution. Print media: Newspaper, Posters, Flyers, Billboards, Press releases. Community outreach: workplace information sessions, FNNP Offices (eight offices, drop-ins welcomed) and the Annual FNNP Members Meeting (November 2020)

(2) Identified environmental and social risks associated with this project relate to the potential for (2.1) the spread of misinformation about the cash transfer scheme, (2.2) increased incidence of gender based violence for scheme recipients, (2.3) the potential for downstream impacts of TA outputs (recommended TA cash-for-works and employment support programs), (2.4) COVID-19 transmission and (2.5) the generation of e-waste through the procurement of hardware.

(2.1) The risk of misinformation spreading. The Fijian cash transfer scheme is distributed through FNNP. FNNP provide a 'pension fund' which collects contributions from employees and employers towards workers retirement savings. The WB due diligence exercise identified that because FNNP is associated by the Fijian public with their retirement, some misinformation has spread in local media about whether the cash transfer scheme is providing recipients with unemployment benefits, or draining their own retirement savings. The FNNP and GoF has already held a comprehensive information sharing campaign to mitigate the spread of misinformation and dispel false perceptions. The WB due diligence exercise finds that the existing stakeholder engagement activities for sharing information and undertaking meaningful consultation with cash transfer beneficiaries is inclusive and comprehensive. Information about the scheme is available at the FNNP website, mobile app, in person at nine offices across the country, by calling the FNNP information line or through email or fax, through social media, television, newspaper, radio and media releases. Beneficiaries and the general public can also access information, raise questions and file grievances through the FNNP dedicated toll free complaints line and webpage, where the GRM steps and timeframe for grievance handling are outlined. These details and other information sharing and consultation activities are outlined in the SEP. The Project has captured these existing communications platforms within the project's Preliminary Stakeholder Engagement Plan (SEP). The SEP is the main mitigation measure for addressing the risk of misinformation.

(2.2) The risk of gender based violence for women scheme recipients. The Cash Transfer scheme will 'top up' FNNP members 'general accounts' in a phased approach so that all members have a baseline of 1000 Fijian dollars. On average, women have less savings in their accounts than men and will therefore receive more financial support through the Cash Transfers. In Fiji, men often control women and household finances and therefore there is a risk that women will be requested by their partners to i) give men their funds, or ii) to pick up household expenses otherwise covered by men. To mitigate this risk, the project will ensure that grievances, including those relating to sexual exploitation and abuse/sexual harassment (SEA/SH), are received, handled and directed to appropriate services consistent with WB guidelines on SEA/SH. Further to this, Component 2 will explicitly address gender inequalities in social protection program participation and develop supports for managing GBV, sexual exploitation and abuse or sexual harassment through development of the Social Protection Strategy for Fiji.

(2.3) Potential downstream impacts from TA activities relating to cash-for-works and employment support programs. The TA outputs are expected to focus primarily on vulnerable populations not covered by social assistance benefits, including informal workers as well as near-poor groups more broadly. The potential activities that will be supported through Component 2 have not yet been fully defined however, an example would be if a TA output was used to



support a cash-for-works program that finances workers to complete minor civil works such as road maintenance. In this case the downstream risks and impacts might include occupational health and safety, waste management, dust and noise. The E&S Specialist/Officers will therefore be assigned to screen TA activities and ensure outputs are compliant with ESF and relevant Fiji legal and GIIP requirements through the inclusion of key E&S aspects and risks and mitigation measures in TORs. World Bank E&S Specialists will review consultancy TORs and outputs to provide a No Objection prior to finalization to ensure compliance with ESF and relevant Fiji legal and GIIP requirements.

(2.4) COVID-19 transmission. Stakeholder engagement activities may increase the risk of transmission of COVID-19, as such the ESCP states that a COVID-19 safety protocol will be developed and implemented within 60 days of Project Effectiveness.

(2.5) The generation of e-waste. To address this impact the Project will prepare a waste management plan based on ESF, Fiji legal and GIIP requirements. The ESCP states that the Waste Management Plan will be finalized prior to the procurement of any hardware.

Retroactive financing. The due diligence exercise finds that no additional environmental and social due diligence is required for the retroactive financing of the cash transfer scheme. The potential for E&S risks was examined retroactively with the risk of misinformation being the one relevant issue. The risk is already being mitigated through the ongoing stakeholder engagement and communications by MoE and FNPF, these activities are captured in the project SEP.

(3) Project mitigation measures. The following project documents will be developed by the Borrower to support environmental and social risk management: i) a cash transfer operational manual that will specify eligibility criteria and procedures for the verification of the beneficiaries, personal data collection and processing and grievance redress mechanisms; ii) a Cash Transfer Agreement between MOE and FNPF which will require the FNPF to carry out activities in relation to the Cash Transfers in accordance with sound E&S standards and practices; and iii) a general Project Operational Manual which will specify implementation arrangements for the ESCP and the E&S instruments. The ESCP states that these documents will be finalized within 90 days of the Project effective date and before disbursement respectively.

The Project has already disclosed the approved draft SEP which is available on both the MoE and WB websites. The final SEP will be updated and disclosed within 60 days of the project effective date.

The final ESCP will be approved and disclosed on the MoF and WB website ahead of Project appraisal. The final ESCP requires the Borrower to develop a fit for purpose Labor Management Procedure (LMP) within 60 days of effective date.

ESS10 Stakeholder Engagement and Information Disclosure

ESS10 is relevant to the Project. The project recognizes the need for an effective and inclusive engagement with project stakeholders including beneficiaries (cash transfer beneficiaries under component 1) and the general public. The Project will utilize the existing communications strategy and platforms developed by the MOE and FNPF. Information sharing and stakeholder consultations are aimed at dispelling false information about the cash transfer



scheme and providing a transparent, effective and responsive mechanism for stakeholders to lodge grievances, including on a sensitive nature. Sensitive issues include incidents of gender based violence, sexual assault and harassment, corruption, fraud and other integrity and accountability issues. Stakeholder information sharing and public consultations relating to Component 2 outputs will form part of the TA TOR, designed and implemented during the TA preparation, and a targeted and updated SEP developed as part of the TA output.

A preliminary SEP has been prepared for engaging with stakeholders on the E&S risks of the project and will be disclosed on the MOE website. The SEP covers the broader project activities, identifies and analyses key stakeholders (i.e. affected parties, other interested parties and disadvantaged and vulnerable groups) and describes the process and modalities for sharing information on the project activities, incorporating stakeholder feedback into the Project and reporting and disclosure of project documents. The ongoing and future stakeholder engagement activities outlined in the SEP include different modes of communication to reach vulnerable groups, including people with special needs. The SEP also states that ethnically and culturally sensitive communication approaches should be developed as needed.

The SEP outlines the existing grievance mechanism which will be utilized by the project to enable stakeholders to raise project related concerns and grievances.

The MOE will update the SEP during project implementation, and no later than 60 days after project effective date. The GM will ensure core elements are in place to enable affected people and the project workforce to raise concerns and complaints - including adequately trained staff with GM responsibilities, community awareness tools, grievance lodgment tools, and investigation and feedback processes.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

ESS2 is relevant to the Project.

Project Implementation Management, Monitoring & Evaluation, will finance: i) recruitment of project management personnel and technical consultants; ii) operating expenses for project management, reporting and supervision; iii) support for procurement, FM, environmental and social safeguards; and iv) a consultancy firm to develop the TA under Subcomponent 2.3.

The project workforce is expected to include: i) direct workers: government staff and a small number of consultants engaged directly by the MOE (i.e. project management personnel); and ii) contracted workers engaged through MOE: FNPF and a TA consultancy firm.

Fiji has a comprehensive legislative framework governing labor and working conditions. At the international level, Fiji has ratified 38 ILO Conventions, which is more than any other country in the Pacific. The WB due diligence assessed that Fiji's labor legislation is comprehensive and sufficiently covers the issues relating to this Project including: i) working conditions and management of worker relationships, ii) protecting the workforce, iii) grievance mechanism,



iv) occupation health and safety and v) contracted workers. The ESS2 requirements associated with and community and primary supply workers are not relevant for the project.

Project workers will utilize the existing grievance mechanisms:

- **Direct Workers:** MOE has an established and functioning grievance redress mechanism which will be utilized by direct workers engaged under the project. Direct workers (government staff and consultants in the PMU) are informed of the mechanism within their employment contract; information about the mechanism is also publicly available at the MOE website. The existing mechanism meets ESS2 requirements as set out in para 21-3 of the ESF. The mechanism will receive complaints of a sensitive nature, including with respect to gender based violence, sexual harassment and assault on a confidential and anonymous basis. Grievances of a sensitive nature are directed to trained professionals with the GoF human resources department.
- Under Fiji law, all contacted workers are required to adhere to the Fijian legislative framework governing labor and working conditions. FNPF have an operations manual that will enable the project to achieve objectives materially consistent with ESS2. The existing mechanism meets ESS2 requirements as set out in para 21-3 of the ESF. FNPF retain trained councilors to address staff grievances of a sensitive nature, including with respect to gender based violence, sexual harassment and assault. the Fijian legislative framework will apply to the TOR for the TA consulting firm, and reviewed for material consistency with ESS2 by the PMU ES Specialists and World Bank staff before providing a No Objection. The TA TOR will be developed as part of project implementation.

The key risk for project workers is COVID-19 transmission. Stakeholder engagement activities may increase the risk of transmission of COVID-19 to project workers when completing activities such as community engagement, as such the ESCP states that a COVID-19 safety protocol will be developed and implemented within 60 days of Project Effectiveness.

In accordance with ESS2 and Fijian law, due to the hazardous work situation, children under the age of 18 will not be allowed to work on the project. The use of forced labor or conscripted labor on the project is also prohibited.

The GoF, via the ESCP, has committed to the preparation of a LMP which will i) respond to the specific health and safety issues posed by COVID-19, and ii) protect workers' rights as set out in ESS2.

ESS3 Resource Efficiency and Pollution Prevention and Management

ESS3 is relevant to the Project. In particular, to the potential downstream risks and impacts associated with the TA activities included in Component 2 and the generation of e-waste through the procurement of hardware. Whilst water, energy and materials will be used during TA activities the use of resources will be commensurate with small scale office activities and is not expected to be significant. No risks were identified with respect to the cash transfers in Component 1 for this standard.

No cash-for-works or employment support programs will be implemented as part of the Project however, TA activities financed by Component 2, such as the development of operational manuals for temporary employment opportunities, may support downstream activities such as minor civil works which in turn have minor pollution impacts such as waste disposal or the production of dust or noise. These impacts should be easily managed through



compliance with Fiji legislation such as the Environment Management Act 2005 that governs the protection of natural resources, and the control and management of development, waste and pollution in Fiji and the Fiji Codes of Environmental Practice. The ESCP states that E&S Specialist/Officers will screen TA activities and ensure outputs are compliant with the ESF and relevant Fiji legal and GIIP requirements through the inclusion of aspects and risks and mitigation measures in TORs. World Bank E&S Specialists will review consultancy TORs and outputs to provide a No Objection prior to finalization to ensure compliance with this standard and the ESCP includes exclusions such as ‘activities that have high probability of causing serious adverse effects to human health and/or the environment’.

The ESCP states that the Project will prepare a waste management plan based on ESF, Fiji legal and GIIP requirements prior to the procurement of any hardware. Waste management is governed by the Ministry of Local Government in Fiji and controlled by the Environmental Management Act 2005 and Environmental Management Regulations 2007 and according to the Asia Development Bank Solid Waste Management – Fiji Country Snapshot, the Suva City Council conducts a special collection drive for e-waste twice a year.

ESS4 Community Health and Safety

ESS4 is relevant to the Project.

While no cash for works or employment support programs will be implemented as part Component 2 of the Project, potential downstream risks and impacts from the supporting TA outputs (e.g. manuals) may impact the health and safety of community members whom are engaged to complete work under the cash-for works program. As such, the E&S Specialist/Officers will be assigned to screen TA activities and ensure outputs are compliant with ESF and relevant Fiji legal and GIIP requirements. World Bank E&S Specialists will review consultancy TORs and outputs to provide a No Objection prior to finalization and the ESCP includes exclusions such as ‘activities that have high probability of causing serious adverse effects to human health and/or the environment’.

Stakeholder engagement activities may increase the risk of transmission of COVID-19. As such, a COVID-19 safety protocol will be developed and implemented within 60 days of Project Effectiveness.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

ESS5 is not relevant to the Project.

Involuntary land acquisition, including involuntary physical and economic displacement on a temporary or permanent basis is excluded from the project, including downstream activities, as reflected in the exclusions list of the ESCP.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS6 is relevant to the Project. In particular, to the potential downstream risks and impacts associated with the TA activities included in Component 2. No risks were identified for this standard with respect to the cash transfers financed by Component 1.



While no cash for works or employment support programs will be implemented as part of the Project, TA activities financed by Component 2 (e.g. the development of operational manuals for temporary employment opportunities) may support downstream activities such as minor civil works which in turn may be associated with minor areas of land clearance. These impacts should be easily managed through the implementation of Fiji legislation such as the Environment Management Act 2005 that governs the protection of natural resources, and the control and management of development, waste and pollution in Fiji.

The ESCP states that E&S Specialist/Officers will screen TA activities and ensure outputs are compliant with the ESF and relevant Fiji legal and GIIP requirements through the inclusion of aspects and risks and mitigation measures in TORs. World Bank E&S Specialists will review consultancy TORs and outputs to provide a No Objection prior to finalization to ensure compliance with this standard and the ESCP includes exclusions such as ‘activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) adverse impacts’.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

ESS7 is not relevant to the Project.

The Indigenous Peoples of Fiji, the iTaukei, are the mainstream society in Fiji. The iTaukei represent the majority, or 57 percent of the population according to the 2007 census. As iTaukei customary cultural, economic, social and political institutions are the mainstream culture of Fijian society, ESS7 is not considered relevant. The remaining population in Fiji are comprised of Indo-Fijians (38 percent), whose ancestors migrated to the Fijian Islands in the late 19th and early 20th centuries. The remaining 5 percent consist of other minority communities, including people from various Pacific Island countries, Australia, New Zealand, the People’s Republic of China, and Europe.

The Project’s ESCP and SEP commit the project to raising awareness and conducting stakeholder engagement with disadvantaged or vulnerable individuals and groups across the Fijian population, including across diverse ethnic groups. Awareness raising and stakeholder engagement will be adapted to account for such groups or individuals’ particular sensitivities, concerns and cultural sensitivities.

ESS8 Cultural Heritage

ESS8 is relevant to the Project.

While no cash for works or employment support programs will be implemented as part of the Project, potential downstream risks from the supporting TA outputs (e.g. manuals) may have associated risks and impacts such as those relating to small areas of land disturbance from minor civil works. As such, the E&S Specialist/Officers will be assigned to screen TA activities and ensure outputs are compliant with ESF and relevant Fiji legal and GIIP requirements. World Bank E&S Specialists will review consultancy TORs and outputs to provide a No Objection prior to finalization and the ESCP includes exclusions such as ‘activities that may cause long term, permanent and/or irreversible (e.g. loss of cultural heritage) adverse impacts’.

ESS9 Financial Intermediaries



ESS9 is not relevant to the Project.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:

N/A

IV. CONTACT POINTS

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V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Sandor I. Karacsony, Lansong Zhang
Practice Manager (ENR/Social)	Susan S. Shen Cleared on 02-Dec-2020 at 10:18:28 GMT-05:00
Safeguards Advisor ESSA	Nina Chee (SAESSA) Concurred on 02-Dec-2020 at 11:41:28 GMT-05:00