



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 08/15/2024 | Report No: ESRSA03653

**I. BASIC INFORMATION****A. Basic Operation Data**

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P180807	Investment Project Financing (IPF)	DCRS	2025
Operation Name	Digitally Connected and Resilient Samoa		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Samoa	Samoa	EAST ASIA AND PACIFIC	Digital Development
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
INDEPENDENT STATE OF SAMOA	Ministry of Communications & Information Technology, Office of the Regulator	14-Aug-2024	15-Oct-2024
Estimated Decision Review Date	Total Project Cost		
29-Jul-2024	20,050,000.00		

Proposed Development Objective

To increase the use of resilient broadband internet in Samoa and improve the delivery of digitally enabled public services

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

No

C. Summary Description of Proposed Project Activities

[Description imported from the PAD Data Sheet in the Portal providing information about the key aspects and components/sub-components of the project]

The proposed operation aims to support the Government of Samoa in establishing climate and disaster resilient national digital connectivity infrastructure and strengthening the institutional



capacity for digital government and digital economy, including cybersecurity. The first component is designed to support the development of climate and disaster-resilient national digital connectivity infrastructure to maximize the benefits of digital connectivity for public institutions, businesses, and citizens of Samoa, and to introduce channels for national-level atmospheric hazards and other disasters early warning notification. The component will seek to leverage the infrastructure investments already made by service providers and other stakeholders (such as the Electric Power Corporation, Vodafone and Digicel), to catalyze investment for those parts of the digital connectivity value chain, where significant gaps persist and those that have the largest impact on costs and reliability of internet connectivity. The project will provide technical assistance and capacity building for the preparation, negotiation and implementation of one or more Public Private Partnership (PPP) transactions and associated regulatory reforms, including a feasibility study, consultation processes, validation of design, costs, and preparation of transaction documentation. Moreover, emphasis will be placed on directing investments toward green technologies (e.g., high-efficiency fiber optic cables and solar power) and cybersecurity of critical infrastructure. It will comprise three subcomponents managed by the MCIT. The second component will support the development and strengthening of the policy, legal and regulatory enabling environment and institutional arrangements needed to underpin the investments in digital government and the digital economy, including strengthening of GoS cybersecurity initiatives. Skill development initiatives will be prioritized as part of the transition to the digital economy, including support to increase participation in the digital economy on a gender informed basis. It will support for current telecommunications regulatory priorities, particularly to promote investment, technological innovation, and the long-term interests of users of digital infrastructure and services in Samoa. The third component will finance technical and operational assistance for Project management and implementation. It will finance the establishment of a Sector Coordination division within MCIT, which will be led by a Sector Coordinator supported by four project officers responsible for financial management, procurement, safeguards and M&E. The Sector Coordination division will be assisted by experts from the Centralized Technical Services Support Unit (CTSSU) under MOF.

D. Environmental and Social Overview

D.1 Overview of Environmental and Social Project Settings

[Description of key features relevant to the operation's environmental and social risks and opportunities (e.g., whether the project is nationwide or regional in scope, urban/rural, in an FCV context, presence of Indigenous Peoples or other minorities, involves associated facilities, high-biodiversity settings, etc.) – Max. character limit 10,000]

Samoa is a small Polynesian state located in the South Pacific. The country has a population of less than 200,000 people distributed across two main (Upolu and Savai'i) and two smaller islands (Apolima and Manono). The national capital is Apia, located on the island of Upolu. Settlements on Upolu and Savai'i are concentrated on the coastal plains and rolling slopes. The ethnic structure in Samoa is predominantly ethnic Samoan. Official languages are Samoan and English. Administratively, the country is divided into 11 districts with approximately 362 villages. The traditional governance and socio-economic system (Fa'amatai) is central to Samoan culture.



Three telecom operators, namely Vodafone Samoa, Digicel (owned by Telstra of Australia) and Computer Services Ltd. offer telecommunications services. Around 97 percent of the population have 4G coverage while the population penetration for mobile subscriptions is 49.7%. Total fixed broadband subscriptions is around 2,145 with 6.1% household penetration. The cost of connecting remote villages is commercially unviable given the significant cost of fixed overheads and the relatively sparse population spread over a wide geographical area. The Samoan National Broadband Highway (SNBH) provides secure high-speed bandwidth to over 60 government ministries, schools and hospitals.

The project will be implemented on the two main islands of Upolu and Savai'i. Technical assistance activities are likely to be concentrated in government centers in urban areas of Apia. Digital infrastructure investments to extend broadband connectivity will occur in unserved and underserved communities in peri-urban and rural areas of Upolu and Savai'i.

D.2 Overview of Borrower's Institutional Capacity for Managing Environmental and Social Risks and Impacts

[Description of Borrower's capacity (i.e., prior performance under the Safeguard Policies or ESF, experience applying E&S policies of IFIs, Environmental and social unit/staff already in place) and willingness to manage risks and impacts and of provisions planned or required to have capabilities in place, along with the needs for enhanced support to the Borrower – Max. character limit 10,000]

The Ministry of Finance (MOF) will serve as the executing agency. The implementing agencies will be the Ministry of Communications & Information Technology (MCIT) and the Office of the Regulator (OoTR, which have engaged with the previous Bank-funded projects (WS: Pacific Regional Connectivity Program: Phase 3 – Samoa P128904) where OoTR was one of the four implementation agencies while MCIT was a beneficiary agency.

The project will be conducted in accordance with the World Bank's Environmental and Social Framework (World Bank ESF) and will partially utilize Samoa's environmental and social framework (Samoa ESF)- informed by the gap analysis of the Samoa's ESF relevant to project activities and risks against the World Bank's ESF conducted during project preparation. The ESCP outlines where Samoa's ESF will be partially utilized and any additional measures to meet the requirements of the World Bank ESF.

Key agencies responsible for implementing Samoa's ESF such as the Ministry of Works, Transport and Infrastructure - Planning and Urban Management Agency (PUMA) and Ministry of Commerce, Industry and Labour (MCIL) and Ministry of Natural Resources and Environment (MNRE) have limited resources to carry out their functions. The project will hire an E&S specialist to ensure the project is conducted in accordance with Samoa's ESF and the World Bank's ESF. The Centralized Technical Services Support Unit (CTSSU) under MOF, includes an environmental and social specialist who will provide environmental and social support for all WB projects in Samoa – including the Digital Support Project.

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

A. Environmental and Social Risk Classification (ESRC)

Moderate



A.1 Environmental Risk Rating

Moderate

[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 4,000]

The environmental risk is moderate as the project typologies are expected to be temporary and/or reversible, low in magnitude, site-specific, and without the likelihood of impacts beyond the actual footprint of the project. The project typologies include (i) technical assistance (i.e. type 2 activities under the World Bank Advisory Note Technical Assistance and the Environmental and Social Framework, 2019) and (ii) digital infrastructure, which includes digital connectivity (e.g., fiber connections) and software to increase the capacity of the existing network. The moderate environmental impacts can include occupational health and safety (OHS) associated with encountering unknown cables and services, and Improper disposal of waste materials and e-waste generated from use and disposal of hardware from upgrading of the SNBH (i.e. removal of old fiber optic cables and equipment). Potential environmental impacts during the construction of digital infrastructure are expected to be limited, temporary and readily manageable through project siting away from sensitive environmental areas, design/choice of technology and Samoa's environmental permitting and regulatory framework, which is governed principally by the Planning and Urban Management Act 2004 (PUM Act 2004) and specific requirements for environmental assessment of projects is provided by the Planning and Urban Management (Environmental Impact Assessment) Regulations 2007 (EIA Regulations 2007).

A.2 Social Risk Rating

Moderate

[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 4,000]

Social risks are rated as Moderate. The social benefits of increased connectivity include increased access to government services, welfare, education, health; and better connectivity to family, friends and social networks. This is particularly beneficial to those who may be considered vulnerable due to disabilities, people isolated from the broader community due to unemployment, parental roles, age etc. and people living in remote island communities. However, increased connectivity can also result in increased risks for the community including cyber attacks (i.e. phishing, ransomware), data leaks, cyber bullying, and exposure to illicit material and exploitation of youths (particularly females). These risks will be managed through strengthened ICT regulatory environment and cyber awareness campaigns. Privacy and data security risks associated with the digital government platform will be managed through design. There are also risks relating to unequal access based on ability to pay, gender, age or ability - which the project will mitigate by supporting last mile fiber to premises connectivity for unserved and underserved communities as well as pilot initiatives. Social impacts associated with physical infrastructure are expected to be limited and can be managed through stakeholder engagement, project design/choice of technology and siting, land access and compensation arrangements and standard E&S management requirements. A moderate risk rating is considered appropriate as the project is not complex, does not have large physical



footprint, does not involve activities that have a high potential for harming people or the environment, and can be located away from environmentally or socially sensitive areas.

[Summary of key factors contributing to risk rating. This attribute is only for the internal version of the download document and not a part of the disclosable version – Max. character limit 8,000]

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

B.1 Relevance of Environmental and Social Standards

ESS1 - Assessment and Management of Environmental and Social Risks and Impacts

Relevant

[Explanation - Max. character limit 10,000]

Environmental and social risks are assessed to be moderate, temporary, and readily manageable due to the project's two typologies: (i) digital infrastructure and (ii) technical assistance (TA). Social and environmental risks will be assessed alongside and managed through detailed project/activity design. The risk of exclusion of vulnerable and marginalised groups (i.e. digital divide) will be managed through the implementation of project design measures (i.e. connection of last mile fiber to premises; public wifi access; broadband pilots; and TA for public awareness, national strategies etc). Cyber security risks to beneficiaries will be managed through the implementation of project design measures to enhance Samoa's existing cybersecurity protection capacity i.e. TA for the National Computer Emergency Response Team (SamCERT) and Child Sexual Abuse Material (CSAM) and review of strategy, policy and guidelines; cyber security infrastructure; and cyber safety community awareness program). The GoS lacks comprehensive privacy and data protection legislation and through the ESCP has committed to preparing, adopting and implementing due diligence of privacy and data security risks associated with the project using the principles set out in the World Bank's Data Privacy Policy as GIIP including measures to integrate privacy and data protection into activity design and support the development of strong legal and regulatory frameworks. Environmental and social impacts associated with small works will be managed through Samoa's environmental and social framework and specifically the national development consent and environment permitting process outlined in the Ministry of Works and Infrastructure Act 2002, Planning and Urban Management Act 2004, Environmental Impact Regulations 2007, Codes of Environmental Practice 2007 and other relevant legislation. The GoS through the ESCP, has committed to strengthening the E&S screening process, and to ensuring that the environmental and social assessments prepared for the project also meet the requirements of ESS1. Additional E&S resources including an E&S Specialist will be hired, and will be supported by the CTSSU E&S specialist, to ensure these requirements are met. The World Bank Advisory Note Technical Assistance and the Environmental and Social Framework (2019) or paragraphs 14-18 of ESS1 will be applied to enhance the TA activities (e.g., technical assistance and capacity building to support: legal, regulatory, policy and institutional



frameworks; green technologies; feasibility studies for the optimal network design; and preparation, negotiation and implementation of the public private partnership (PPP) transaction and associated regulatory reforms). The GoS, through the ESCP, has committed to ensuring that the terms of reference and subsequent outputs of TA activities are consistent with the ESSs. OP 4.03 Performance Standards for Private Sector Activities will not apply to PPP activities under subcomponent 1.1, however elements of the performance standards may be incorporated where appropriate and consistent with the ESSs.

ESS10 - Stakeholder Engagement and Information Disclosure

Relevant

[Explanation - Max. character limit 10,000]

Project stakeholders include project affected people/beneficiaries of improved digital connectivity including communities and households – particularly those in rural/remote areas, government agencies, schools and hospitals and more broadly the Samoan public. The analysis of Samoa's ESF indicates that stakeholder engagement is a well established practice in Samoa and both MCIT and OoTR have internal resources and a proven track record of consultation and information disclosure. A SEP has been prepared for the project and disclosed on MCIT's website (www.mcit.ws). The SEP identifies key stakeholders; describes the process and modalities for sharing information on the project activities and seeking/incorporating stakeholder feedback into project design and during implementation – drawing on existing process within Samoa (i.e. MWIT's Code of Environmental Practice 3 on Consultation; GoS Cabinet Handbook 2011 – inter-agency and public consultation) and existing resources and practices within MCIT and OoTR (i.e. Policy and Planning Team, Media Team, websites, Facebook pages and ministry radio station). The SEP outlines specific strategies for engaging vulnerable and disadvantaged groups; and outlines approaches for reporting and disclosure of project documents. The SEP also outlines the Project's Grievance Mechanism (GM), utilizing and enhancing existing MCIT and OoTR feedback and complaints mechanisms - which will enable stakeholders to raise project related concerns and grievances. The GoS through the ESCP has committed: i) to recruiting a communications specialist (in addition to the project E&S specialist) to support SEP implementation; ii) updating and implementing the SEP throughout implementation; and iii) operationalization the project GRM and maintaining it throughout project implementation.

ESS2 - Labor and Working Conditions

Relevant

[Explanation - Max. character limit 10,000]

The Project is expected to include a small and manageable workforce of i) direct workers, including consultants employed directly by the IAs and ii) workers employed through third parties such as telecom operators and consulting firms. Primary supply workers, including within the solar photovoltaic supply chain, will be confirmed during preparation. All workers will be over the age of 18. Labor and working condition risks and occupational health and safety risks for the Project workforce are expected to be minor. The analysis of Samoa's ESF indicates that Samoa's regulatory arrangements for managing labor and working condition risks associated with the project are materially consistent with the objectives of ESS2. Key



legislation includes the Labour and Employment Relations Act 2013; Labour and Employment Regulations 2016; Occupational Safety and Health Act 2002; Occupational Safety and Health Regulation 2017; and Public Service Act 2004. MCIL is responsible for labor and working conditions; although its capacity is limited. MCIT and OOTR follow Public Service Commission's requirements and processes and both IAs have experience in managing consultant and works contracts. The GoS, through the ESCP, has committed to manage the project workforce in accordance with Samoan's country framework for managing labor and working conditions and ESS2 requirements. A stand-alone labor management procedure is not required. Instead requirements will be outlined in the POM. The GoS, through the ESCP, has committed to: i) outline, adopt and implement specific labor and working requirements for project workers, contractors, subcontractors and supervising firms; ii) ensure that all project workers are 18 years and over; and iii) establish, maintain and operate a grievance mechanism for Project workers; and outline, adopt and and implement standard SEA/SH prevention and response measures.

ESS3 - Resource Efficiency and Pollution Prevention and Management

Relevant

[Explanation - Max. character limit 10,000]

A minimal amount of e-waste will result from the digital infrastructure, with routine safety precautions expected to be sufficient to prevent accidents and easily mitigated in a predictable manner, which will be included in the ESCP. The software, hardware and other electronic equipment or devices purchased under the project will comply with energy efficiency standards set out under Samoa's environmental and social framework and will be set out in the ESCP.

ESS4 - Community Health and Safety

Relevant

[Explanation - Max. character limit 10,000]

Community health and safety risks are considered to be minor and manageable. Cyber risks and privacy and data security risks to the community, and particularly vulnerable groups will be managed through the project's cyber-awareness activities and adoption of GIIPs on data privacy. The project workforce conducting project activities within communities is expected to be small and manageable; however, it is likely to interact with vulnerable groups - i.e. women, children/youth ...etc. The GoS, through the ESCP has committed to assessing and managing specific risks and impacts to community health and safety arising from project activities and ensuring implementation of SEA/SH prevention and response measures; E&S mitigation measures that address potential road and pedestrian safety during cable installation; and OHS measures for construction activities, following relevant EHS Guidelines in accordance with ESS4.

ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Relevant



[Explanation - Max. character limit 10,000]

Land access will be required to upgrade fibre network and improve power supply for the SNBH; provide telecom infrastructure and fiber to the premise connections to unserved and underserved areas; and to conduct the broadband pilot for public infrastructure. Land requirements are not expected to result in any significant impacts. The project will not compulsory acquire land. Where possible existing road, electricity and/or telco easements on state land will be utilized. Where customary or freehold land is required, land access will be negotiated via lease arrangement. Where arrangements cannot be agreed, alternative land will be found for project infrastructure or alternative connectivity infrastructure will be proposed. Impacts on economic assets and livelihoods will largely be avoided through appropriate siting of infrastructure. The GoS has committed, through the ESCP to developing and implementing a land access and compensation protocol to ensure that land access and associated impacts are adequately managed in accordance with ESS5. The protocol will outline the process for confirming existing land arrangements and access to land on a voluntary basis. It will highlight the prioritization of government land and provide guidance on: i) lease agreements, ii) collating the relevant land documentation; iii) consultations with landowners/leaseholders; and iv) use of the project's GRM. The protocol will require a Land Access Plan be prepared and implemented for each site, with completion of a land due diligence report as relevant, before contractors can access land and commence civil works.

ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources

Not Currently Relevant

[Explanation - Max. character limit 10,000]

The setting and design/choice of site and technology will be applied to ensure civil works are not located close to or near sensitive areas or biodiversity in the two main islands selected for the proposed interventions.

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

Not Currently Relevant

[Explanation - Max. character limit 10,000]

ESS7 is not relevant in Samoa. The ethnic structure in Samoa is predominantly ethnic Samoan (92.6%) with a minority of Europeans and biracial European/Polynesian people. There are no known distinct IP groups that meet the criteria in ESS7. Whilst ESS7 is not relevant, the project will be implemented in a culturally appropriate manner in accordance with ESS1, ESS5, ESS8 and ESS10.

ESS8 - Cultural Heritage

Relevant

[Explanation - Max. character limit 10,000]

ESS8 has minor relevance to the Project. The footprint of the digital infrastructure is expected to be small and will mostly be laid within road reserves or on Government-leased land. Most



infrastructure is flexible in its location, and cultural heritage sites can be avoided, for example, the site-specific screening process. For precaution, the ESCP will require contractors to implement Chance Find Procedures or measures to avoid impacts on cultural heritage, including consultation of key sites to avoid inclusion of cultural heritage.

ESS9 - Financial Intermediaries

Not Currently
Relevant

[Explanation - Max. character limit 10,000]

No financial intermediaries will be engaged in the project activities.

B.2 Legal Operational Policies that Apply

OP 7.50 Operations on International Waterways

No

OP 7.60 Operations in Disputed Areas

No

B.3 Other Salient Features

Use of Borrower Framework

In Part

[Explanation including areas where "Use of Borrower Framework" is being considered - Max. character limit 10,000]

A gap analysis of Samoa's E&S framework relevant to project activities and risks has been conducted against the World Bank's ESF and will be included for reference in the Project Operations Manual. Samoa's ESF has been assessed as broadly consistent with the objectives of the World Bank ESF, with the notable acceptability of ESS5, where material gaps regarding land access and compensation have been identified. Resource and capacity gaps with key Samoan agencies tasked with implementing Samoa's ESF have also been identified.

Environmental and social risks will be managed with partial use of Samoa's ESF. This includes the national development consent and environmental permit process; regulatory arrangements for managing labor and working conditions (including OHS risks) and statutory public consultation requirements. The project includes additional resources, including an IA E&S specialist, supported by the CTSSU E&S specialist, to ensure the implementation of these elements of Samoa's ESF is materially consistent with the World Bank ESS. The ESCP also includes additional actions and measures needed to meet the Bank's Environmental and Social Standards.

Use of Common Approach

No

[Explanation including list of possible financing partners - Max. character limit 4,000]

n/a



B.4 Summary of Assessment of Environmental and Social Risks and Impacts

[Description provided will not be disclosed but will flow as a one time flow to the Appraisal Stage PID and PAD – Max. character limit 10,000]

Environmental and social risks associated with the project are considered moderate. The project consists of two typologies: digital infrastructure and technical assistance (TA) activities for two main islands of Upolo and Savai'i. The digital infrastructure component involves the installation of connectivity infrastructure, such as fiber connections, software, and hardware, as well as the rollout of broadband pilot(s) to enhance capacity and throughput. The TA activities support the digital government strategy, the legal and institutional framework for digital government, the upgrade of the government data center, and the strengthening of policies and regulations for digital government and the digital economy.

The benefits of increased connectivity are increased access to government services, welfare, education, health; and better connectivity to family, friends and social networks. However, increased connectivity can also result in increased risks for the community including cyber attacks (i.e. phishing, ransomware), cyber bullying and exposure to illicit material and exploitation of youths (particularly females). These risks can be managed through strengthened ICT regulatory environment and cyber awareness campaigns. Privacy and data security risks associated with the digital government platform can be managed through design. There are also risks relating to unequal access to benefits which the project will mitigate by supporting last mile fiber to premises connectivity for unserved and underserved communities as well as pilot initiatives for public sites such as medical facilities, schools and government offices. Social and land access impacts are expected to be limited and can be managed through stakeholder engagement and project design/choice of technology and siting. Potential environmental and occupational health and safety (OHS) risks are associated with encountering unknown cables and services and improper disposal of waste materials.

Environmental and social risks will be managed with partial use of Samoa's ESF. The Project includes additional resources including an IA E&S specialist, supported by the CTSSU E&S specialist to ensure implementation of these elements of the Samoa's ESF are materially consistent with the World Bank ESF and ESSs. The project's ESCP includes additional measures necessary to address Project-related environmental and social risks and impacts in accordance with the World Bank ESF and ESSs

C. Overview of Required Environmental and Social Risk Management Activities

C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required by implementation?

[Description of expectations in terms of documents to be prepared to assess and manage the project's environmental and social risks and by when (i.e., prior to Effectiveness, or during implementation), highlighted features of ESA documents, other project documents where environmental and social measures are to be included, and the related due diligence process]



planned to be carried out by the World Bank, including sources of information for the due diligence
- Max. character limit 10,000]

The following environmental and social instruments will be prepared during implementation

- Terms of references and related E&S instruments (i.e. Preliminary Environmental Assessment Report) be developed for small works activities to ensure compliance with ESF and GoS requirements and be submitted for World Bank review and no objection
- A Land Access and Compensation Protocol be developed in compliance with GoS and ESS5 requirements and will be submitted for World Bank review and no objection
- Conduct due diligence using the principles set out in the World Bank's Personal Data Privacy Policy as a GIIP
- Terms of reference and outputs of TA activities include assessment and management of E&S risks (i.e. cyber-related risks, privacy and data security risks) in accordance with WB ESF and GoS requirements and GIIP and be submitted for World Bank review and no objection
- An Environmental and Social Capacity Building and Training Plan be prepared to ensure IAs and contractors are suitably informed and trained to implement the WB and GoS E&S requirements.

III. CONTACT POINT

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V. APPROVAL

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