The World Bank
Digital Samoa Project (P180807)

Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 12/14/2023 | Report No: ESRSC04015

I. BASIC INFORMATION

A. Basic Operation Data

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P180807	Investment Project Financing (IPF)	Digital Samoa	2025

Operation Name	Digital Samoa Project

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
Ministry of Finance	Ministry of Communications & Information Technology, Office of the Regulator	21-Jun-2024	15-Oct-2024

Estimated Concept Review Date	Total Project Cost		
19-Dec-2023	20,050,000.00		

Proposed Development Objective

To increase resilient, inclusive and safe access to broadband and enhance the capacity of the Recipient to deliver 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 Concept 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 project has two components. The first component finances the expansion and upgrading of Samoa National Broadband Highway (SNBH), extension of terrestrial fiber network for unserved and

underserved areas, rollout of broadband pilots and upgrading of the government data center with an option of migrating to a cloud computing platform. The second component finances capacity building for the Office of the Regulator and the Ministry of Communications & Information Technology to create the enabling environment for digital government and digital economy. The second component also responds to Samoa's need for technical and institutional capacity in cybersecurity to safeguard the country's digital infrastructure and protection of users of ICT services.

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 2,000]

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 proposed project will be implemented on the two main islands of Upolo 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 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 2,000]

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 Centralized Technical Services Support Unit (CTSSU) under MOF, includes an environmental and social specialist and will provide environmental and social support for all WB projects in Samoa – including the Digital Support Project. Further, the project will hire an E&S specialist to support the IAs in implementing the project in accordance with Samoan legislation and the World Bank's ESF.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL 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 2,000]

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 2,000]

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 bulling, and exposure to illicit material and exploitation of youths (particularly females). These risks will 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 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. Project impacts during construction and land access are expected to be limited and can be managed through stakeholder engagement and project design/choice of technology and siting 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 2,000]

B. Relevance of Standards and Policies at Concept Stage

B.1 Relevance of Environmental and Social Standards

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

[Optional Explanation - Max. character limit 1,000]

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 project/activity design. Environmental and social impacts associated with small works can be managed through Samoa's environmental and social framework. 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., capacity building and support in legal, regulatory, policy and institutional frameworks; green technologies; feasibility studies for the optimal network design; and PPP financing options. The IAs will prepare an Environmental Social Commitment Plan (ESCP) describing the material measures and actions to ensure compliance with the ESF requirements.

ESS10 - Stakeholder Engagement and Information Disclosure   Relevant

[Optional Explanation - Max. character limit 1,000]

Project stakeholder are expected to 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. A SEP will be prepared and disclosed for the project. The SEP will identify/confirm and analyze key stakeholders; describe 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 in Samoa (i.e. MWTI's Code of Environmental Practice 3 on Consultation); outline specific strategies for engaging vulnerable and disadvantaged groups; and outline approaches for reporting and disclosure of project documents. The SEP will also outline the Project's Grievance Redress Mechanism (GRM) which will enable stakeholders to raise project related concerns and grievances.

ESS2 - Labor and Working Conditions   Relevant

[Optional Explanation - Max. character limit 1,000]

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 ESCP will include the requirement to manage the

project workforce in accordance with Samoan employment and OHS Regulation 2017 and ESS2 requirements. A labor management procedure is not required. A gap analysis against ESS2 will be conducted before appraisal. Any additional measures to ensure compliance with ESS2 requirements to manage risks in the PV supply chain (if required) will be included in the ESCP, project operations manual and individual employment contracts.

ESS3 - Resource Efficiency and Pollution Prevention and Management   Relevant

[Optional Explanation - Max. character limit 1,000]

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

[Optional Explanation - Max. character limit 1,000]

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 ESCP will require a code of conduct to be implemented for all project workers. The ESCP will require contractors to implement community health and safety measures, including SEA/SH prevention and response measures. The ESCP will require 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

[Optional Explanation - Max. character limit 1,000]

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. A land access protocol will be developed to ensure that land access and associated impacts are adequately managed.

ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources   Not Currently Relevant

[Optional Explanation - Max. character limit 1,000]

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

[Optional Explanation - Max. character limit 1,000]

The ethnic structure in Samoa is predominantly ethnic Samoan (92.6%) with a minority of Europeans and biracial European/Polynesian people. There are no IPs as defined by ESS7 in Samoa.

ESS8 - Cultural Heritage   Relevant

[Optional Explanation - Max. character limit 1,000]

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

[Optional Explanation - Max. character limit 1,000]

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

[Optional explanation – Max. character limit 1,000]

Environmental and social risks will be managed relying on national requirements, laws and regulations. This includes the national environmental permit process; regulatory arrangements for managing labor and OHS risks; and statutory public consultation requirements. The national environmental permit procedure will require small works for the digital infrastructure to prepare a Preliminary Environmental Assessment Report, including an action plan. Before appraisal, a gap analysis of the borrowers E&S framework relevant to project activities and risks will be conducted

against the ESF. The Environmental and Social Commitment Plan (ESCP) will include additional actions and measures needed to meet the Bank's Environmental and Social Standards including due diligence using the principles set out in the World Bank's Personal Data Privacy Policy as a GIIP; an environmental and social code of practice for small works and a land access protocol and community health and safety measures.

Use of Common Approach   No

[Optional Explanation including list of possible financing partners – Max. character limit 1,000]

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 Concept Stage PID – Max. character limit 5,000]

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 bulling 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.

Potential environmental impacts can be managed through Samoa's environmental permitting and regulatory framework an the project's Environmental Social Commitment Plan (ESCP) which will include additional measures necessary to address Project-related environmental and social risks and impacts. It is important to note that the TA activities (e.g., capacity building and support in legal, regulatory, policy and institutional frameworks and feasibility study for the optimal network design and efficient installation of fiber optic network) do not have direct adverse environmental and social impacts. However, the terms of reference (TORs) and outputs of the TA activities will be reviewed to ensure alignment with paragraphs 14-18 of ESS1.

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 Appraisal?

[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 3,000]

The following environmental and social instruments will be prepared prior to appraisal:
- Environmental and Social Commitment Plan (ESCP)
- Stakeholder Engagement Plan (SEP)
- Gap analysis of the borrower's E&S framework relevant to project activities and risks against the World Bank's ESF

The Environmental and Social Commitment Plan (ESCP) will include actions and measures to be implemented during project implementation including:
- any additional actions and measures needed to meet the Bank's Environmental and Social Standards
- e-wastes that are generated by the project be managed to capture relevant national E&S / ESF requirements
An Environmental and Social Code of Practice for small works that capture relevant national E&S / ESF requirements will be submitted for World Bank review and no objection.
- 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 Protocol be developed in compliance with GoS and ESF 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
- Management of the project workforce in accordance with Samoan employment and OHS legislation and ESS2 requirements standard SEA/SH prevention and response measures
measures to manage community health and safety risks in accordance with ESS4 and GoS requirements.
- Measures to avoid impacts on cultural heritage in accordance with ESS8 and GOS requirements including implementation of chance find procedures.
- 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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