Public Disclosure Authorized

Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 29-Feb-2024 | Report No: PIDISDSA37405

BASIC INFORMATION

A. Basic Project Data

Country	Project ID	Project Name	Parent Project ID (if any)
Kiribati	P181658	Additional Financing for the Kiribati Outer Islands Transport Infrastructure Investment Project	P165838
Parent Project Name	**Region**	**Estimated Appraisal Date**	**Estimated Board Date**
Kiribati Outer Islands Transport Infrastructure Investment Project	EAST ASIA AND PACIFIC	01-Mar-2024	29-Mar-2024
Practice Area (Lead)	**Financing Instrument**	**Borrower(s)**	**Implementing Agency**
Transport	Investment Project Financing	Republic of Kiribati	Ministry of Infrastructure and Sustainable Energy, Ministry of Finance and Economic Development, Ministry of Information, Communications and Transport

Proposed Development Objective(s) Parent

The PDO is to improve the connectivity, safety and climate resilience of transport infrastructure on Selected Outer Islands, and in the event of an Eligible Crisis or Emergency, to provide an immediate response to the Eligible Crisis or Emergency.

Components

Component 1: Safe Inter-Island Navigation
Component 2: Resilient Outer Island Access Infrastructure
Component 3: Strengthening the Enabling Environment
Component 4: Contingent Emergency Response

PROJECT FINANCING DATA (US$, Millions)

SUMMARY

Total Project Cost	10.00
Total Financing	10.00
of which IBRD/IDA	10.00
Financing Gap	0.00

DETAILS

World Bank Group Financing

International Development Association (IDA)	10.00
IDA Grant	10.00

Environmental Assessment Category

B-Partial Assessment

'Have the Safeguards oversight and clearance function been transferred to the Practice Manager?' No

Decision

The review did authorize the team to appraise and negotiate

Other Decision (as needed)

B. Introduction and Context

Country Context

1. The Republic of Kiribati is one of the most remote and geographically dispersed countries in the world, and among the most vulnerable to climate change. The country comprises three island groups, namely the Gilbert Islands Group, Phoenix Islands Group, and Line Islands Group – dispersed over 3.5 million square miles spanning the western and central regions of the Pacific Ocean. Its population of 119,438 is spread over 22 inhabited islands[1] spanning 3,300 kilometers from east to west. Twenty-one of these islands are small atolls rising on average less than two meters above sea level. With a total land area of only 811 square kilometers and limited domestic agricultural capacity, Kiribati is heavily dependent on imported goods and food. Due to its small size, Kiribati is included in the World Bank's Harmonized List of Fragile and Conflict-Affected Situations (FCS).

2. More than half of Kiribati's population resides in the capital of South Tarawa, a small atoll islet facing population-related pressures associated with its limited land and water resources. South Tarawa provides opportunities for employment, consumption, and access to higher education and specialized services not available elsewhere in Kiribati. Betio Port, the sole international gateway port for the Gilbert Islands Group where 90.5 percent of Kiribati's population resides, is located on South Tarawa. Given its relative economic development and modernity, South Tarawa is a magnet for internal migration from the outer islands and an important destination for accessing services not available on outer islands. Access to fresh water is particularly challenging, as saltwater intrusion and drought increasingly affect the capital's limited groundwater supplies.

1 National Statistics Office, Ministry of Finance (2021). 2020 Population and Housing General Report and Results. Bairiki, Tarawa.

Sectoral and Institutional Context

3. Maritime transport plays a vital role in the economy and the social welfare of the I-Kiribati people. Owing to its specific geography as a low-lying and widely dispersed island country, Kiribati has extremely high maritime infrastructure needs relative to the size of its population and economy. About 45,000 people reside on the 17 outer islands of the Gilbert Islands Group; these inhabited outer islands span more than 600 kilometers (km) in the western Pacific.[2] Despite heavy reliance on connectivity to South Tarawa for critical goods and services, maritime and access infrastructure of the outer islands – such as channels, aids to navigation (AtoNs), jetties, and ramps –are outdated and frequently obsolete. Navigational charts for some of Kiribati's outer islands date to the 1960s.

4. Intra-island transport is commonly undertaken using small dinghies to cross central lagoons or via causeways linking islets comprising the individual atolls. The majority of causeways on the outer islands have been built with cement-sand bag revetment walls filled with locally sourced coral aggregates. However, there is considerable variability in the materials used, quality of construction and condition. Damage or absence of causeways and bridges on outer islands often require alternative crossings by boat, foot, or bicycle.

5. Kiribati's geographical features, socio-economic conditions, and environmental factors amplify its susceptibility to climate change-related impacts. Kiribati, including its outer islands, is highly exposed to climate change impacts such as sea level rise, storm surge, and coastal erosion, which threaten to undermine basic infrastructure needed for access to goods and services. Even a minor rise in sea levels can have catastrophic consequences for Kiribati, potentially leading to the submersion of its islands and the displacement of its population.

6. Coastal erosion, soil degradation, and saltwater infiltration also threaten Kiribati's ability to maintain its territorial integrity and sustain its population. Coastal erosion, already a visible problem, is intensified by the increased frequency and force of storm surges and other extreme weather events, which will become more common as the climate continues to change. The loss of land not only affects the homes and livelihoods of the I-Kiribati people but also leads to the destruction of critical ecosystems, such as coral reefs and mangroves, which serve as natural barriers against the sea. The islands depend on fragile freshwater lenses that are easily contaminated by saltwater intrusion, a problem that is exacerbated by sea-level rise and over-extraction. This poses a significant threat to drinking water supplies, sanitation, and agriculture, potentially leading to severe water shortages and undermining food security.

C. Proposed Development Objective(s)

Original PDO

The PDO is to improve the connectivity, safety and climate resilience of transport infrastructure on Selected Outer Islands, and in the event of an Eligible Crisis or Emergency, to provide an immediate response to the Eligible Crisis or Emergency.

[2] Secretariat of the Pacific Community (2022). Kiribati Census Atlas. Noumea, New Caledonia. Pacific Community.

Current PDO

The PDO is to improve the connectivity, safety and climate resilience of transport infrastructure on Selected Outer Islands, and in the event of an Eligible Crisis or Emergency, to provide an immediate response to the Eligible Crisis or Emergency.

Key Results

Progress toward achievement of the PDO will be measured against the following PDO-level results indicators:

a. Boat crews that have up-to-date maps and understand aids to navigations (percentage);
b. Villages served by causeways rehabilitated with climate resilience measures (number);
c. Population served with improved access to social and economic services (number).

D. Project Description

7. KOITIIP was approved by the World Bank Board of Executive Directors on March 12, 2020, with a financing amount of US$30 million and declared effective on October 2, 2020. KOITIIP is co-financed by the Asian Development Bank (ADB) in the amount of US$12 million, bringing the total financing to US$42 million. The PDO is "to improve the connectivity, safety and climate resilience of transport infrastructure on Selected Outer Islands, and in the event of an Eligible Crisis or Emergency, to provide an immediate response to the Eligible Crisis or Emergency." KOITIIP is part of the Pacific Climate Resilient Transport Program (PCRTP) Series of Projects (SOP), which focuses enhancing climate resilience in the transport sector across the Pacific region.[3]

8. KOITIIP aims to improve the safety and resilience of transport infrastructure on four outer islands of Abaiang, Nonouti, Beru and Tabiteuea South, which were prioritized by the Government of Kiribati (GoK) based on demography and infrastructure condition. Key activities include (i) undertaking hydrographic surveys and updating navigational charts to improve navigation safety to the prioritized islands; (ii) rehabilitation and improvement maritime infrastructure to ensure safe navigation and climate resilience; rehabilitation of causeways by MISE through Force Account; and recruitment of a Mentoring Firm (engineering consultancy) to support MICT and MISE with implementation of the civil works; and (iii) institutional strengthening for project implementation and management of outer island infrastructure, with a focus on climate resilience.

9. The original KOITIIP project has the following four components and costs.

(a) **Component 1: Safe Inter-Island Navigation (US$7.5 million equivalent)**. This component finances hydrographic surveys (by Airborne Laser Bathymetry [ALB] and vessel-based Multi-Beam Echo Sounder [MBES] surveys), preparation and publishing of maritime charts focusing on the four prioritized islands, and associated contract management services. The hydrographic surveys will provide data required for (i) preparation of the updated navigational charts to improve ship navigational safety and (ii) preparation of climate resilient civil works designs for maritime and access infrastructure works financed by Component 2. Training and exposure of MICT staff during the delivery of this component will increase hydrographic capacity and long-term self-sufficiency.

[3] The SOP is structured around the transport infrastructure needs of the nine Pacific Island Countries, which includes: (i) fully exploiting the available economic opportunities, (ii) enhancing access to employment opportunities, (iii) protecting incomes and livelihoods, and (iv) strengthening the enablers of growth and opportunities.

The enhanced hydrographic capacity for navigation is essential for ensuring operational safety of vessels. Data and capacity building will also lead to more climate resilient spatial planning by establishing detailed baselines from which to monitor the impacts of climate change on lagoon marine resources, reefs, and coastlines.

(b) **Component 2: Resilient Outer Island Access Infrastructure (approximately US$22.5 million equivalent)**. This component finances soft and hard costs associated with improvements to the four outer islands' infrastructure. Soft activities of this component include: (a) engineering studies, including climate resilience measures, and preparation of bidding documents; (b) preparation of environmental and social safeguards instruments; (c) execution of civil works; (d) maintenance of project assets; (e) third-party audits for technical and environmental and social (E&S) aspects; (f) on-the-job training of local unskilled labor for carrying out rehabilitation and routine maintenance of project assets. This component will promote the participation of women and will include project related gender-based violence (GBV) prevention and mitigation measures. It includes three subcomponents:

(i) **Sub-Component 2.1 Improvement of Ship Safety Navigation (approximately US$2 million equivalent)** finances the design and replacement of existing defective AtoNs, associated supervision costs, and technical assistance to establish a system for their sustainable maintenance. Locations of the new AtoNs will be informed by outputs of Component 1.

(ii) **Sub-Component 2.2 Rehabilitation of Island Access Infrastructure (approximately US$12.5 million equivalent).** This component will finance the design, construction, and supervision of the following prioritized climate resilient infrastructure: 2.2(a) on Abaiang: construction of a jetty, passenger terminal and concrete ramp; and on Beru: small-scale dredging at Tebikerike, construction of a passenger terminal, and seawall upgrades; 2.2(b) on Nonouti and Tabiteuea South: construction of small multipurpose maritime facilities, including concrete boat ramp, shelter, and AtoN workshop and small equipment. 2.2.(c) includes engineering studies, capacity development of MISE staff, and quality assurance audits, as well as preparation of environmental and social safeguards instruments. All infrastructure will be designed to accommodate the needs of women, children, the elderly and disabled.

Table 1: Maritime Facilities under Sub-components 2.1 and 2.2

Island	Project Activities Per Island
Abaiang	Design and construction of: Aids to Navigations (AtoNs), floating jetty, concrete boat ramp with winch, and passenger terminal/shelter
Beru	Design and construction of: AtoNs and passenger terminal/shelter, rehabilitation to existing seawall and ramp, and small-scale dredging to channel and turning basin
Nonouti	Design and construction of: AtoNs and passenger terminal/shelter, AtoN workshop, boat ramp with winch
Tabiteuea South	Design and construction of: AtoNs, passenger terminal/shelter, AtoN workshop, boat ramp with winch

(iii) **Sub-Component 2.3 Rehabilitation of Lagoon Crossings (approximately US$8 million equivalent).** This component finances (a) rehabilitation and upgrading works for existing causeways, including climate resilient features such as durable wearing course designs, proper drainage, and erosion control; and technical assistance and training for maintenance programs, including the participation of women in causeway maintenance; and (b) accompanying consulting services to support detailed design and delivery, including technical assistance to support site investigations, engineering studies, design, construction, and maintenance of the causeways, supervision of works, quality assurance audits, capacity development of MISE staff, and preparation of environmental and social safeguards instruments. The causeways to be rehabilitated are located on the three Outer Islands of Beru, Nonouti and Tabiteuea South. Works will be undertaken by Force Account with support of the Mentoring Firm consultancy. A MISE Implementation Manual/Force Account manual will guide technical and administrative aspects of the works.

(c) **Component 3: Strengthening the Enabling Environment (approximately US$12.0 million equivalent)** finances technical assistance to strengthen MICT's and MISE's capacity to manage transport sector assets with a focus on ensuring that they are climate resilient.

(i) **Sub-Component 3.1: Institutional Strengthening (approximately US$2.0 million equivalent)** provides technical assistance to support to (a) the Marine Division of MICT for use of a marine spatial database to enable climate-informed maritime operation; (b) capacity building and mentoring for MISE staff, program licenses, and software.

(ii) **Sub-Component 3.2: Operational Support for the Outer Islands Implementation Unit (OIIU) (approximately US$5.0 million equivalent)** finances project management and operational costs - consultants or goods - associated with the implementation of the proposed project and capacity building.

(i) **Sub-Component 3.3: Operational Support for the Kiribati Fiduciary Services Unit (KFSU) (approximately US$ 5.0 million equivalent)** will (a) strengthen the capacity of the existing KFSU, to provide implementation support to KOITIIP and other IDA/IBRD financed or co-financed projects and (b) finance KFSU's project management and operating costs for KOITIIP.

(d) **Component 4: Contingent Emergency Response (US$0 million equivalent)** provides an option to re-allocate uncommitted project funds to support emergency response and reconstruction.

10. **The Additional Financing for Kiribati Outer Islands Transport Infrastructure Investment Project (KOITIIP AF) will cover a financing gap emerging from cost overruns Component 2, which finances infrastructure to improve the safety and resilience of inter-island navigation and intra-island access infrastructure for climate-vulnerable outer islands of Kiribati.**

11. The KOITIIP AF will also introduce the following changes to KOITIIP: (i) revise Component 2 costs; (ii) extend the project closing date by 18 months and make corresponding changes to the disbursement schedule, project implementation timeline, and results indicator target dates; and (iii) remove the intermediate indicator monitoring installation of tide gauges and incorporate the new World Bank Group Scorecard Indicator for transport. The Project Development Objective (PDO), outcome targets, and project scope will remain unchanged. This is the first AF and restructuring of KOITIIP. If approved, the cumulative project implementation period will be seven years and nine months.

12. Condensed procedures are used for preparation of KOITIIP AF. Paragraph 12 of Section III of the Bank Policy: Investment Project Financing is triggered due to capacity constraints associated with specific vulnerabilities Kiribati experiences as a small state. Due to its remoteness and small size, Kiribati faces disproportionately high infrastructure costs and difficulty accessing non-concessional financing to support these, and severe challenges attracting firms from neighboring markets, particularly post-pandemic.

E. Implementation

Institutional and Implementation Arrangements

13. **Implementation arrangements outlined in the KOITIIP Project Appraisal Document (Report No. PAD3543) are in place and well-functioning.** KOITIIP has three implementing entities: the Ministry of Information, Communications and Transport (MICT), which is responsible for oversight of the maritime sector; the Ministry of Infrastructure and Sustainable Energy (MISE), which shares responsibility for national infrastructure; and the Ministry of Finance and Economic Development (MFED), which is responsible for responding to an eligible crisis or emergency if the Contingent Emergency Response Component (CERC) is activated. The lead implementing unit is the Outer Island Implementation Unit (OIIU).

14. The Development Coordination Committee (DCC) and Technical Task Force are in effect, and OIIU and KFSU are staffed. The OIIU Project Manager, as head of the Task Force, is providing technical oversight to the implementation of hydrographic survey and mapping exercise and coordinating procurement processes of the Mentoring Firm and the D&B contract, among recruitment of other technical and non-technical positions. MISE has prepared the draft MISE Implementation Manual (i.e., Force Account Manual) outlining administrative, fiduciary, staffing, and technical requirements for carrying out project-financed civil works under Force Account. The Implementation Manual is being updated on an ongoing basis and will be completed prior to commencement of works under Force Account.

15. **KOITIIP is in compliance with most the legal covenants of the Financing Agreement and GoK is taking steps to ensure full compliance as soon as possible.**[4] Full compliance with legal covenants is expected before close of the third quarter of 2024, after the following actions have been taken: (i) the Annual Work Plan and Budget, currently under revision, will be finalized and accepted by IDA by March 15, 2024; (ii) the draft MISE Implementation Manual will be finalized with inputs from the Mentoring Firm by September of 2024; and (iii) the Mid-Term Review (MTR) will be initiated via in-person mission in March of 2024 and concluded via virtual mission in April.[5]

16. **Procurement**. The performance of procurement is rated Moderately Satisfactory. Project Procurements are undertaken in accordance with the World Bank Procurement Regulations for Investment Project Financing (IPF) Borrowers, issued in July 2016 and revised in August 2018 and using the World Bank's Systematic Tracking of Exchanges in Procurement (STEP) system. Procurement plans are updated regularly, and procurement is undertaken with consideration of prevailing market conditions.

17. **Financial Management (FM).** The FM performance rating is Moderately Satisfactory. There are no overdue financial reports, the interim financial report (IFR) for the period ending December 31, 2023, was submitted on time, and of acceptable quality. The MISE Implementation Manual contains arrangements and

[4] Annex 2 provides an overview of the status of the covenants.
[5] Completion of the MTR via virtual mission will allow

procedures for financial management and audit of the force account works which are continually updated as needed. Measures to further improve ongoing FM performance have been agreed and are under initial implementation. A reimbursement of ADB funds to the World Bank Designated Account (DA) for an expenditure paid from it due to inadequate funds availability in ADB DA, is expected to be completed by March 31, 2024. The KFSU and OIIU are establishing a monitoring procedure to minimize future delay retiring travel advances and procedures to ensure adequate supporting documents for payment processing. The OIIU and the KFSU have agreed to finalize the FY24 Annual work plan and budget (AWPB) incorporating the comments received from the Bank and resubmit to the Bank before end of February 2024.

18. **Environmental Safeguards.** Implementation performance of environmental safeguards is rated Satisfactory. KOITIIP is a Category B project and has triggered OP4.01 (Environmental Assessment) and OP4.04 (Natural Habitats). The GoK prepared an Environmental and Social Management Framework (ESMF) to provide guidance on due diligence requirements for sub-projects and manage the environmental risks and impacts. Environmental and social (E&S) screening of sub-projects has commenced in accordance with the ESMF. The ESMF has been accepted by the World Bank and publicly disclosed by the GoK and World Bank. Based on the results of the final E&S screening reports, additional E&S instruments will be developed prior to the start of civil works. Environmental instruments related to maritime infrastructure will be prepared by D&B contractor during the design phase, while MISE and the Mentoring firm will develop instruments for causeway works.

19. **Social Safeguards.** The implementation performance of social safeguards is rated Satisfactory. The project is Category B for OP4.12 (Involuntary Resettlement) and a Resettlement Framework (RF) was prepared to guide due diligence requirements during project implementation and the preparation of other Abbreviated Resettlement Action Plans (ARAPs) should involuntary resettlement impacts be identified following design. The GoK's RF which has been accepted by the World Bank and publicly disclosed by the GoK and World Bank. No involuntary land acquisition is anticipated, and other involuntary resettlement impacts are expected to be minor. Land requirements for the project works for island access infrastructure is expected to utilize existing Government land or new long-term land leases on a voluntary basis. Consultations with host communities and other key stakeholders have been ongoing. An effective and accessible Grievance Redress Mechanism (GRM) has been established and is operational in each of the project outer islands. To date, there have been three grievances, all of which have been resolved. The KFSU and the OIIU are staffed with E&S staff to screen and guide preparation of relevant social safeguard instruments and action plans. OIIU staff will prepare resettlement due diligence reports and Abbreviated Resettlement Action Plans (ARAPs), where required, as works design stage commences.

20. **Gender.** will improve women's access to services and economic opportunities in the outer islands. The project is categorized as Effective Gender Mainstreaming (EGM) for ADB. ADB supports the GOK with implementation of a project Gender Action Plan (GAP), and OIIU reports progress of the GAP quarterly. The GAP includes activities and targets for women's employment in project roles and works as well as enhancing their participation in consultations. To date, at least 39 percent of participants to community consultations have been women and six skilled positions financed by KOITIIP have been filled women. The project will actively promote employment opportunities for local women in construction, especially for causeways and their subsequent ongoing maintenance. The GBV risk for the project is rated moderate in accordance with the Bank's GBV Risk Assessment Tool, mostly in relation to the geographically dispersed nature of the project. The GBV Action Framework provides outlines mitigation and response measures for GBV and sexual exploitation, abuse, and harassment (SEAH). Training in the GBV Action Framework, inductions to the Code of Conduct, and refreshers are being undertaken for the implementing entities and consultants engaged in the project.

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F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

The project activities will take place on the outer islands of Kiribati, with the first phase of works to be undertaken on the islands of Abaiang, Nenouti, Tabiteuea South and Beru. The nation comprises 32 atolls and reef islands and one raised coral island, Banaba. They have a total land area of 800 square kilometers and are dispersed over 3.5 million square kilometers. Their spread straddles both the equator and the 180th meridian. The permanent population is just over 110,000 (2015), more than half of whom live on Tarawa Atoll. Abaiang has approx. 5,800 inhabitants, Nonouti and Beru 4,900 inhabitants, and Tabiteuea South 1,300 inhabitants. With its remote location, small size, dispersed islands setting and other geographical factors, Kiribati faces many challenges in developing and maintaining sustainable internal (intra and inter-island), regional and international transport and communication linkages, all of which are crucial to the economic development and social well-being of its population. The four project components include both studies and surveys and physical works. Works may include the rehabilitation of existing causeways; limited dredging and construction of boat ramps and jetties across the four selected outer islands. In addition, the project also includes provisions for hydrographic surveys, maritime charting and the installation of maritime navigation aids.

G. Environmental and Social Safeguards Specialists on the Team

Craig Andrew Clark, Social Specialist
Rosemary Alexandra Davey, Environmental Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	
Performance Standards for Private Sector Activities OP/BP 4.03	No	
Natural Habitats OP/BP 4.04	Yes	
Forests OP/BP 4.36	No	
Pest Management OP 4.09	No	
Physical Cultural Resources OP/BP 4.11	No	
Indigenous Peoples OP/BP 4.10	No	
Involuntary Resettlement OP/BP 4.12	Yes	

Safety of Dams OP/BP 4.37	No
Projects on International Waterways OP/BP 7.50	No
Projects in Disputed Areas OP/BP 7.60	No

KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:
The overall project impact is expected to be positive and is assessed to pose moderate social and substantial environmental risks. An environmental and social management framework (ESMF) and a Resettlement Framework have been prepared, consulted and disclosed describing possible impacts along with mitigation requirements, including the preparation of ESMPs and RPs when required. The safeguards screening of sub-projects is currently underway.

For Component 1 the key safeguards impact is likely to relate to safety at sea during the completion of the hydrographic surveys and maritime charting. Additionally, the component outputs will define the detailed design of Component 2 potentially leading to both safety and environmental impacts if outputs are not accurate.

The proposed causeway rehabilitation and construction including the potential installation of culverts included in Component 2 may impact on local and nearby benthic and intertidal habitats. Changes in hydrodynamics resulting from the proposed culvert installation works may both have positive (better flushing) and negative (erosion/accretion) impacts, which in turn may have impacts on water quality and coastal stability. These impacts are in addition to the more typical construction impacts that include noise, emissions to air and water, material sourcing, waste disposal and occupational and community health and safety. Preliminary due diligence on the causeways indicates that the associated land is Government owned with no third-party use. Island access infrastructure under Component 2 is expected to utilize existing Government land or potentially new long-term leases on a voluntary basis. Impacts on non-land assets are expected to be minor. During the design process, when works sites are confirmed, either due diligence reports will be prepared to confirm no involuntary resettlement impacts, or RPs prepared to provide for compensation and assistance to address impacts as guided by the RF.

An ESMF will be prepared and disclosed for the potential CERC activities associated with Component 4 prior to the component's activation.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:
The project is not expected to cause any indirect or long term negative impacts. This will be verified through the completion of the ESIAs after detailed design and managed through the ESMF screening process.

The project is expected to result in positive impacts through improved marine safety after the completion of the hydrographic surveys, maritime mapping and installation and rehabilitation of navigational aids.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.
Alternative investment types and locations were considered in line with the Project Development Objective and the minimization of safeguards impacts such as those relating to resettlement and land access. The situating of island access infrastructure will be informed by the results of the hydrological study and options to minimize land access impacts for the associated infrastructure. The components selected were deemed to provide the most positive impact and no significant or long-term negative safeguards impacts.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.
An Outer Islands Implementation Unit (OIIU) has been established to house the project management and safeguards specialists exclusively for the KOTIIP project that will cover maritime and causeway activities by both MISE and MICTTD. Safeguards oversite is being provided by national environmental, social, gender/GBV and community liaison officers engaged full time with additional support as needed from an international consultant.

MISE and MICTTD both have previous experience in the implementation of World Bank funded projects.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.
Key stakeholders were identified during the preparation of the project who were consulted as part of the development of the Project and in the preparation of the ESMF and RF. A stakeholder engagement plan has been prepared for the project and consultation activities are ongoing. Consultations are undertaken with relevant Government agencies, civil society groups, commercial interest groups, youth and community members and potentially affected people. Consultations with potentially affected people includes information about project design features and upcoming activities, entitlement principles and the GRM. Meetings are held on each of the selected island on an ongoing basis.

B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors

"In country" Disclosure

Resettlement Action Plan/Framework/Policy Process

Date of receipt by the Bank	Date of submission for disclosure

"In country" Disclosure

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)

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APPROVAL

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