



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

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Appraisal Stage | Date Prepared/Updated: 22-May-2018 | Report No: 126415



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Project ID	Project Name	Parent Project ID (if any)
Tonga	P167166	Additional Financing for the Pacific Resilience Project under the Pacific Resilience Program	P154840
Parent Project Name	Region	Estimated Appraisal Date	Estimated Board Date
PACIFIC RESILIENCE PROJECT UNDER PACIFIC RESILIENCE PROGRAM	EAST ASIA AND PACIFIC	24-May-2018	17-Jul-2018
Practice Area (Lead)	Financing Instrument	Borrower(s)	Implementing Agency
Social, Urban, Rural and Resilience Global Practice	Investment Project Financing	Kingdom of Tonga	Ministry of Finance and National Planning, Ministry of Environment, Energy, Climate Change, Disaster Mgmt, Meteorology, Information and Comms

Proposed Development Objective(s) Parent

The objective of the Project is to strengthen early warning, resilient investments and financial protection of Tonga.

Components

Component 1: Strengthening Early Warning and Preparedness

Component 2: Risk Reduction and Resilient Investments

Component 3: Disaster Risk Financing

Component 4: Project and Program Management



**PROJECT FINANCING DATA (US\$, Millions)**

**SUMMARY**

<b>Total Project Cost</b>	17.418
<b>Total Financing</b>	17.418
<b>of which IBRD/IDA</b>	14.95
<b>Financing Gap</b>	0.00

**DETAILS**

**World Bank Group Financing**

International Development Association (IDA)	14.95
IDA Grant	14.95

**Non-World Bank Group Financing**

Counterpart Funding	0.40
Borrower	0.40
Other Sources	2.068
AUSTRALIA, Government of	2.068

Environmental Assessment Category

B-Partial Assessment

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

Decision



## **B. Introduction and Context**

### Country Context

1. Tonga consists of 169 islands with a total population of around 104,000. Situated in the South Pacific the country stretches across 800 kilometers from north to south, with land area of approximately 800 square kilometers. The population is primarily Polynesian, with a literacy rate close to 99 per cent and a relatively low incidence of poverty. However, its small size, geographic dispersion and isolation, and limited natural resources, provide a narrow economic base. Agriculture, fishing and tourism account for most export earnings. There is a high dependency on external aid (approximately 15 percent of Gross National Income, GNI). Remittances from an estimated 100,000 Tongans abroad have historically been equivalent to about 30 percent of GNI.

2. In recent years, Tonga has been hard-hit by a number of economic and natural shocks which have eroded its fiscal buffers and capacity to respond to further shocks. Tonga was negatively impacted by the Global Economic Crisis through a substantial and prolonged decline in remittances and tourism receipts, and price spikes in imported food and fuel on which households are heavily dependent.

### Sectoral and Institutional Context

3. Tropical Cyclone Gita struck the Kingdom of Tonga on February 12, 2018 as a Category 4 Tropical Cyclone. The TC caused, among other things, damage and losses to the education sector totaling US\$ 10.2 million. The total impact of Tropical Cyclone Gita on Tonga was extensive, resulting in damage and loss totaling US\$ 164.2 million, which is equivalent to around 38% of Tonga's annual gross domestic product. Recovery needs exceed the existing resources of the government, and consequently, the Government of Tonga has requested assistance from the World Bank for education sector recovery activities.

4. Tropical Cyclone Gita has highlighted the vulnerability of school infrastructure within Tonga. The school buildings were affected disproportionately, with the rapid assessment estimating approximately 75% of the 150 schools on the main island of Tongatapu as affected, compared to 25% for residential buildings. Many students are attending classes in tents provided by UNICEF which are in some cases situated on inundated areas. Urgent reconstruction and repairs are needed to move the students back to a more stable learning environment. Tropical Cyclone Gita also caused damage and losses to public buildings, including health facilities, totaling US\$3.3 million, and there is a need to support the associated recovery activities. In addition to school structures and public buildings that were damaged by the cyclone, Tropical Cyclone Gita has shown there is a need to improve the resilience of such buildings in Tonga more broadly, in order to avoid similar impacts to school and public infrastructure in the future.

5. As a small Pacific island state, Tonga is particularly vulnerable to climate change and natural hazards. Catastrophic risk modeling by the World Bank indicates that Tonga is expected to incur, on average, USD15.5 million per year in losses due to earthquakes and tropical cyclones and losses of up to 14% of GDP in years affected by specific disasters. In the next 50 years, Tonga has a 50 percent chance of experiencing a loss



exceeding USD175 million and casualties higher than 440 people, and a 10 percent chance of experiencing a loss exceeding USD430 million and casualties higher than 1,700 people. According to the World Risk Report 2012, globally Tonga is the second most at risk country from disasters out of 173 countries surveyed. Financial resilience through a suite of tools, including disaster insurance, will be imperative to mitigate disaster risks for Tonga.

### C. Proposed Development Objective(s)

6. The parent project development objective (PDO) of the Pacific Resilience Project (PREP) in Tonga was to strengthen early warning, resilient investments and financial in Tonga. The PDO remains unchanged.

#### Key Results

7. The key results from the additional financing will include:
- a) 9,000 school children to benefit from increased resilience to their school
  - b) 30 school buildings will be rebuilt to improved resilience standards
  - c) 5 years of additional disaster risk financing insurance premiums paid

### D. Project Description

8. The original design of the Project included the following components: Component 1: Strengthening Early Warning and Preparedness; Component 2: Risk Reduction and Resilient Investments; Component 3: Disaster Risk Financing; and Component 4: Project Management. These components would remain, although the scope of Component 2 would be broadened to include the repair, retrofitting and rebuilding of schools damaged by Tropical Cyclone Gita and strengthen the resilience of buildings and related infrastructure (particularly for schools and health facilities). Insurance premiums under Sub-component 3.1.2 would be financed for an additional five years. Additional financing will also be provided to further support the Recipient's capacity to manage and implement the scaled-up project activities under Component 4 of the Project. There are no changes being suggested to Component 1 – Strengthening Early Warning and Preparedness, Sub-component 3.1.1 – Contingency Emergency Response and Sub-component 3.1.3 – Capacity Building for Disaster Risk Financing of the project, and the AF will not be used to finance activities under such components/sub-components.

#### **Component 2: Risk Reduction and Resilient Investments (estimated cost including contingencies: US\$13.918 million)**

9. The proposed Additional Financing will refocus the scope of the original project to move beyond entry level investments and instead implement a program of resilient planning, reconstruction and resilience building for selected public assets, particularly focusing on schools impacted by Tropical Cyclone Gita, with a secondary focus on public buildings including health facilities. In addition to the investments under the ongoing original plan that include selected retrofitting of public buildings in Vava'u, the suggested change is to scale up component 2 through climate and disaster resilient retrofitting, repairs and reconstruction of schools that have been heavily damaged and destroyed by Cyclone Gita, and strengthening the climate and disaster resilience of school buildings and other key public infrastructure assets (such as health facilities) to ensure that the country is better equipped to withstand future disaster events through adaptation. All design and works for infrastructure that is repaired, retrofitted and rebuilt under the project will take into account climate and other natural hazard risk, as well as specific gender based requirements and access needs for



people with disabilities.

10. To accommodate the scale up of Component 2 activities and to reflect the nature of the investments under the Additional Financing, it is proposed to amend Component 2 to:

- (a) Sub-component 2.1.1. Investment planning, preparation and supervision; and
- (b) Sub-component 2.1.2. Resilient investments and Reconstruction.

11. The Ministry of Infrastructure's standard school designs will be upgraded to include strengthened climate and disaster resilience standards (including wind and seismic resilience), universal accessibility and gender considerations, and will be used for all school buildings which will be reconstructed under the project. These standard designs will be used for the resilient reconstruction of approximately 40 single story school buildings, including classrooms, staff housing, toilets and multifunctional facilities. One additional school building has been identified for reconstruction that will require a unique, two storey design. All school and public assets to be repaired or retrofitted under the Project will be inspected by qualified structural engineers to determine the best approach for repairing/retrofitting the building to higher resilience and structural safety standards.

12. Schools that meet the criteria listed below will be considered priorities for reconstruction under the project. Schools that do not meet all of the following criteria will not automatically be ruled out of the Project, however, they will be listed as a lower priority in terms of the timing of interventions. Public assets will be identified and prioritized subject to available funding subsequent to the prioritization of schools. The process for prioritization of schools and public assets will be documented in the Project Operations Manual (POM). Prioritized schools will have:

- (a) Registration with the Ministry of Education as a recognized school facility.
- (b) Suffered damage or destruction from TC Gita.
- (c) Documented and undisputed land ownership and lease arrangements.
- (d) No plans for government to relocate the school to a new location.
- (e) A clear ongoing need, as identified by the government for the school facility in the foreseeable future.
- (f) Suitable site location with acceptable hazard exposure levels. For schools in high-hazard areas, there should be flexibility within the school land envelope to accommodate resilient investments away from high hazard areas (i.e., investment options which are at acceptable distances from the high tide mark for coastal schools).

**Sub-Component 3.1.2: Premiums Financing (estimated cost including contingencies US\$ 2.9 million)**

13. Additional financing of US\$2.5 million will cover the payment for insurance premiums for a further five years and will ensure that Tonga continues to have access to disaster risk insurance as part of strengthening financial protection against natural disasters until October 2023. The additional financing consists of national IDA of US\$ 0.65 million and regional IDA of US\$ 1.85 million. The government of Tonga will provide counterpart funding to support the premia payment in each year as follows: US\$ 60,000 in year 1, US\$70,000 in year 2, US\$80,000 in year 3, US\$90,000 in year 4, and US\$100,000 in year 5. These premia will be paid by the government of Tonga directly to an eligible insurer, such as the Pacific Catastrophe Risk Insurance Company (PCRIC) as was the case for the 2017 premium.

**Component 4: Project Management (estimate cost including contingencies: US\$0.6 million)**



14. Additional Financing will be used to strengthen the capacity of the Project Management Unit (PMU) and cover the incremental cost of financing the PMU from the initial closing date to cover the extended project time frame.

15. A Central Services Unit (CSU) is being established under the Ministry of Finance and National Planning (MFNP). This Unit will be jointly financed by DFAT and the World Bank (through the forthcoming Skills and Employment for Tonga Project). The CSU is mandated to provide both implementation and advisory services in the common fiduciary functions such as Procurement, Financial Management (FM), Safeguards, Monitoring and Evaluation (M&E) and contract management. The CSU would be staffed with full-time experts with international experience. The CSU would also provide capacity building for national staff recruited under the PREP AF. The PMU staff will closely liaise with the CSU and share information related to project implementation with CSU staff/ consultants, and actively engage in performance evaluation of the CSU staff.

16. It is envisaged that regional support from the Pacific Community (SPC) and the Pacific Islands Forum Secretariat (PIFS) will cover AF activities until the original closing date of the ongoing respective SPC and PIFS PREP Grants.

## **E. Implementation**

### **Institutional and Implementation Arrangements**

9. The PMU will continue to be housed within the Ministry of Meteorology, Energy, Information, Disaster Management, Climate Change and Communications (MEIDECC) where MEIDECC will also continue to be the Implementing Agency. However, for the school reconstruction and repairs the Ministry of Education is also a key stakeholder while Ministry of Infrastructure is instrumental in terms of construction standards. To reflect the importance of coordination between the four ministries for effective decision making, the implementation arrangements will include the Ministry of Education and Ministry of Infrastructure in the steering committee of the PREP project as well as in the technical committee. Fiduciary, safeguard and engineering support will be provided to the PMU as needed through the CSU.

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

The Kingdom of Tonga consists of 169 islands with a total population of around 120,000. The country lies in the South Pacific and stretches over a distance of about 800 kilometers from north to south, covering a total land area of 748 square kilometers with an Exclusive Economic Zone (EEZ) of about 700,000 square kilometers. Its small size, geographic dispersion and isolation, and limited natural resources provide a narrow economic base. The project will be implemented on the islands of Tongatapu and 'Eua. Tongatapu is the main island of the Tonga archipelago. Tongatapu is a flat coral island with a land area of 260 km<sup>2</sup>. The island has a population of approximately 74,000 people with 22,000 living in the capital Nuku'alofa. 'Eua island lies approximately 30 km south east of Tongatapu. The island has a land area of 87.5 km<sup>2</sup> and is characterized by settlements/agricultural land with a total of 9 villages and approximately 5000 people in



the west and forested peaks rising to 300m in the East. Tongatapu and ‘Eua have 48 early childhood education centers, 69 primary schools, 24 secondary schools, and 9 tertiary institutions.

**G. Environmental and Social Safeguards Specialists on the Team**

Wolfhart Pohl, Environmental Safeguards Specialist  
Thomas John Callander, Social Safeguards Specialist  
Ross James Butler, Social Safeguards Specialist  
Felix Peter Taaffe, Environmental Safeguards Specialist

**SAFEGUARD POLICIES THAT MIGHT APPLY**

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>The policy is triggered for the parent project.</p> <p>The AF will support the repair and demolition/ reconstruction of government and non-government school (classrooms, school halls, WASH facilities and teacher accommodation) and public infrastructure. These investments have the potential to generate minor to moderate adverse environmental and social impacts. Key risks associated with the project include community expectations related to timing of reconstruction and interim arrangements, community health and safety (including gender-based violence and labour influx), waste/debris reuse and/or disposal and occupational health and safety. (i.e. debris/waste, asbestos, construction). These risks/impacts can be readily managed through standard mitigation measures. Opportunities for positive environmental and social impacts include improve climate resilience of buildings and</p>





functionality improvements, including gender sensitive design and universal access.

As specific design and locations of the AF investments are not yet known, the parent project’s Environmental and Social Management Framework (ESMF) has been revised and updated for AF. The ESMF incorporates the requirements of the World Bank Group’s Environmental, Health and Safety Guidelines (EHSGs).

During implementation, the targetted school and public infrastructure, and the scope of works at each site will be finalised. The updated ESMF will provide guidance on environmental and social screening of sub-projects and subsequent preparation of an Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP), during project implementation.

Performance Standards for Private Sector Activities OP/BP 4.03	No	n/a
Natural Habitats OP/BP 4.04	Yes	<p>The policy is triggered for the parent project, which did not expect to involve significant loss or degradation of natural habitats, but triggered the policy as a precaution.</p> <p>The AF activities will not involve the conversion of natural habitat. The majority of sub-project facilities will be sited within existing school grounds on cleared land. Any schools that are relocated will use cleared land.</p>
Forests OP/BP 4.36	Yes	<p>The policy is triggered for the parent project, as a precaution in the case of limited, incidental forest clearing. The AF activities will not affect forest. All sub-project facilities will be sited on cleared land.islands</p>
Pest Management OP 4.09	No	Neither the parent project nor the AF activities will involve the procurement or use of pesiticides.



Physical Cultural Resources OP/BP 4.11	Yes	The policy is triggered for the parent project, in the case that civil works encountered historically or culturally important resources. The AF will not finance any activities that will have impacts on physical cultural resources. Screening and chance find procedures will be included in the ESMF to exclude all subprojects with these impacts.
Indigenous Peoples OP/BP 4.10	Yes	The policy is triggered for the parent project, as PREP as a regional program includes countries with indigenous peoples. The policy is not relevant to Tonga PREP or the AF, as the ethnic structure in Tonga is predominately ethnic Tongan or part Tongan (97.5%).
Involuntary Resettlement OP/BP 4.12	Yes	<p>The policy was triggered for the parent project as certain project activities had the potential to encroach on customary or private lands.</p> <p>No involuntary land acquisition is expected under the AF activities. The majority of sub-projects will involve repair and demolition/reconstruction on existing school sites. Target schools and public infrastructure are located on government, noble or privately owned land. The ESMF and RPF will require confirmation of land ownership status of all sites and landowner and land user consent prior to the commencement of works.</p> <p>A small number of government schools may be relocated if current sites are deemed high-risk to natural hazards. Relocations sites will be located on government owned land.</p> <p>The parent project's Resettlement Policy Framework (RPF) has been reviewed and confirmed as covering these scenarios. During implementation, Abbreviated Resettlement Action Plans (ARAPs) will be prepared for sub-projects requiring relocation, if required.</p>
Safety of Dams OP/BP 4.37	No	The AF will not finance any dams as defined under OP 4.37.



Projects on International Waterways OP/BP 7.50	No	The AF does not impact or relate to any known international waterways as defined under the policy.
Projects in Disputed Areas OP/BP 7.60	No	The AF is not located in any known disputed areas as defined under the policy.

**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:

Environmental and social issues and impacts of the project are associated with the repair and demolition/reconstruction of school facilities and include:

- Community health and safety, whereby students and school staff are exposed to unstable buildings, hazardous debris, and construction during demolition, repair and reconstruction;
- Gender-based Violence risks associated with reconstruction activities and labour influx are considered high given construction will occur on school grounds and in close proximity to children.
- Reuse and disposal of waste and debris, including environmental impacts of improper waste management, including groundwater contamination, and safety issues of reuse for construction purposes. Substantial volumes of construction demolition waste will be generated during the reconstruction, including concrete, wood, glass, reinforced steel and other building materials. It is not expected that civil works will encounter asbestos, however; the environmental assessment will include provision for its safe handling and disposal;
- Occupational health and safety risks related to the demolition, repair and rebuild of buildings;
- Minor construction related impacts, including noise, dust, erosion, sedimentation and waste management; and
- Community expectations/unrest relating to delay in reconstruction beginning, issues with the interim arrangements, and the prioritization of particular schools over others.

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

The repair and demolition/reconstruction of school facilities is not associated with any negative indirect or long-term impacts. The constructed facilities are expected to provide a long-term education benefits in Tongatapu and ‘Eua by providing more resilient facilities with functionality improvements.



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

N/A

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.

MEIDECC has considered safeguard policy issues through project objectives and preparation. The borrower has reviewed the parent project's ESMF (including the RPF) and updated it where necessary to cover the scope of works described for additional financing. The updated ESMF includes a preliminary assessment of the environmental and social risks of the reconstruction, requirements for subsequent assessment, consultation and grievance redress, and implementation arrangements. The parent project's communication strategy and grievance redress mechanism are currently being revised and updated for AF activities.

The consulting services for design and supervision of reconstruction activities include the preparation of an ESIA/ESMP for the reconstruction. The ESIA will assess key environmental and social risks and potential impacts. The ESMP will outline measures to avoid, mitigate or manage these risks/impacts. Contractors will be required to develop Contractor ESMPs in accordance to the ESMP and the PMU will actively monitor performance.

In regards to risks associated with Labour Influx, works contracts will require training of the workforce and implementation of a Worker Code of Conduct together with sanctions for non-compliance

In regards to waste management, demolition waste is expected to be handled by the recently built Tapuhia Solid Waste Management Facility, a sanitary landfill on Tongatapu. The ESMF gives general provisions for waste management, which will be further detailed in the ESIA/ESMP. In regards to GBV and labour influx

Borrower capacity to plan and implement environmental and social management measures is weak. The existing PREP is yet to hire a safeguards officer as part of the PMU, and this has led to impaired environmental and social management on PREP activities. The PMU is currently in the process of filling this position. The Centralized Support Unit is expected to be established shortly and will provide additional safeguards support during project implementation.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

The key stakeholders are various GoT ministries, schools in Tongatapu and 'Eua damaged by Cyclone Gita, including their staff, students and their families – organized under Parent Teacher Associations (PTAs) for each school. Government ministries relevant to the project include the Ministry of Education and Training, Ministry of Meteorology, Information, Energy, Disaster Management, Climate Change and Communications, Ministry of



Infrastructure and the Ministry of Finance and National Planning. These ministries have been consulted during the project's preparation and will have representatives from each on the PREP AF steering committee. A sample of schools have also been consulted during project preparation, during site visits and as part of MET's wider response to the cyclone recovery.

During project implementation, consultation will be carried out with key stakeholders as per the Public Consultation and Dissemination Plan (refer ESMF). Feedback and input from the schools into the proposed works at each site will be an iterative process, largely undertaken by the D&S consultant, in collaboration with MoI, MET and MEIDECC. Existing consultation channels between the Ministry of Education and each school will also be utilized. The consultation plan will also include notification and awareness during demolition and construction.

The revised ESMF has been disclosed and subsequent environmental and social assessments will also be publicly disclosed.

**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
11-May-2018	15-May-2018	

**"In country" Disclosure**

Tonga  
15-May-2018

Comments

**Resettlement Action Plan/Framework/Policy Process**

Date of receipt by the Bank	Date of submission for disclosure



11-May-2018

15-May-2018

**"In country" Disclosure**

Tonga

15-May-2018

Comments

**Indigenous Peoples Development Plan/Framework**

Date of receipt by the Bank

Date of submission for disclosure

11-May-2018

15-May-2018

**"In country" Disclosure**

Tonga

15-May-2018

Comments

**If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.**

If in-country disclosure of any of the above documents is not expected, please explain why:



**C. Compliance Monitoring Indicators at the Corporate Level (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)**

**OP/BP/GP 4.01 - Environment Assessment**

Does the project require a stand-alone EA (including EMP) report?

Yes

If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?

No

Are the cost and the accountabilities for the EMP incorporated in the credit/loan?

Yes

**OP/BP 4.04 - Natural Habitats**

Would the project result in any significant conversion or degradation of critical natural habitats?

No

If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?

Yes

**OP/BP 4.11 - Physical Cultural Resources**

Does the EA include adequate measures related to cultural property?



Yes

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?

Yes

**OP/BP 4.10 - Indigenous Peoples**

Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?

No

**OP/BP 4.12 - Involuntary Resettlement**

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?

Yes

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

No

Is physical displacement/relocation expected?

No

Is economic displacement expected? (loss of assets or access to assets that leads to loss of income sources or other means of livelihoods)

No





**OP/BP 4.36 - Forests**

Has the sector-wide analysis of policy and institutional issues and constraints been carried out?

NA

Does the project design include satisfactory measures to overcome these constraints?

NA

Does the project finance commercial harvesting, and if so, does it include provisions for certification system?

NA

**The World Bank Policy on Disclosure of Information**

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

Yes

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

Yes



### All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

Yes

Have costs related to safeguard policy measures been included in the project cost?

Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

Yes

### CONTACT POINT

#### World Bank

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Disaster Risk Management Specialist

**Borrower/Client/Recipient**

Kingdom of Tonga

'Aisake Valu Eke

Minister of Finance

**Implementing Agencies**

Ministry of Finance and National Planning

Hon. Dr. Pohiva Tu'lonetoa

Minister of Finance and National Planning

Ministry of Environment, Energy, Climate Change, Disaster Mgmt, Meteorology, Information and Comms

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Minister of Environment and Climate Change



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**APPROVAL**

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**Approved By**

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