

Simplified Approval Process Annex 12: Environmental and social action plan



GREEN
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ABBREVIATIONS

AE	Accredited entity
AF	Adaptation Fund
AR6	Sixth Assessment Report of the IPCC
CC&HAP	Climate Change & Health Adaptation Plan
CIIC	Cook Islands Investment Corporation
CSHR	Climate sensitive health risk
COVID-19	Coronavirus disease 2019
EEZ	Exclusive economic zone
EMCI	Emergency Management Cook Islands
FP	Funding proposal
GAP	Gender Action Plan
GCF	Green Climate Fund
HIU	Health intelligence unit
IRMF	Integrated Results Management Framework
MFEM	Ministry of Finance and Economic Management
MOA	Ministry of Agriculture
NES	National Environment Service
NGO	Non-government organisation
NSDA 2020+	National Sustainable Development Agenda, Te Ara Akapapa'anga Nui
PPF	Project Preparation Facility
SAP	Simplified Approval Process
SEAH	Sexual exploitation, sexual abuse and sexual harassment
SLR	Sea-level rise
SPCZ	South Pacific Convergence Zone
SRIC-CC	Strengthening the Resilience of our Islands and our Communities to Climate Change
TMO	Ministry of Health, Te Marae Ora
TVP	Tarai Vaka process, government project management system

A. INTRODUCTION AND GEOGRAPHY

1. The Environmental and Social Action Plan (ESAP) and the Environmental and Social Safeguards (ESS), Annex 12 is a supporting document for the design of the GCF Funding Proposal: Akamatutu'anga to tatou ora'anga meitaki (**ATOM**), Building Resilient and Healthy Cook Islands Communities.
2. The ESAP was prepared to comply and align with the MFEM ESS requirements and GCF's Revised Environmental and Social Policy, updated Gender Policy, and Indigenous Peoples Policy) and identify which components have been triggered in the preparation of the ESAP (i.e. retrofitting/upgrading works and providing water testing equipment under component 2, seedling distribution and hydroponics in component 3).
3. To support implementation of **ATOM** a risk assessment addressing social and environmental risks is needed to ensure that livelihoods and the environment are safe guarded from potential negative impacts. The GCF Environmental and social screening has been completed and is provided as Appendix 1 of this report.
4. It is the responsibility of MFEM as the Accredited Entity, and Te Marae Ora and Cook Islands Investment Cooperation as co-executing entities to ensure that the requirements of The ESAP and ESS are integrated into the project during the planning and execution of individual and community level activities. It specifies the procedures, activities and institutional mechanisms to be used during the project implementation. It is the AE's responsibility to ensure that proper ESS processes and reporting is in place to ensure the project is delivered with minimal or no negative environmental or social impact
5. The Cook Islands are an archipelago of 15 major islands between 14 °S to 22 °S latitude and 170 °W to 155 °W longitude in the western Pacific Ocean. The northern group of islands lies to the north of the South Pacific Convergence Zone (SPCZ), the southern group lies to the south of the SPCZ Both sub regions of the Cook Islands have a wet season from November to April and dry season from May to October¹. Twelve islands of are inhabited across an Exclusive Economic Zone (EEZ) of nearly two million square kilometres. The country is geographically divided into the main island of Rarotonga, which is the administrative centre and seven other southern group islands (Aitutaki, Manuae, Takutea, Atiu, Mitiaro, Mauke, Mangaia) which are primarily volcanic islands and the low coral atolls in the Northern group (Palmerston, Suvarrow, Nassau, Pukapuka, Rakahanga, Manihiki and Penrhyn). They are also known as the Pa Enea or Outer Islands. The two island groups are markedly different in their social, cultural and economic activities. The Northern Pa Enea remains relatively isolated from the Southern Pa Enea with infrequent and expensive transportation links.
6. They are a vulnerable small island state as identified by the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6) and more specifically will require long term planning as global warming of 1.5°C to 2°C will be exceeded during the 21st century unless deep reductions in carbon dioxide (CO₂) and other greenhouse gas emissions occur in the coming decades. Relative sea level rise (SLR) continues to be a major threat since it can exacerbate the impacts of other climate hazards on low-lying coastal communities

¹ 'NextGen' Projections for the Western Tropical Pacific: Current and Future Climate for Cook Islands Technical Report CSIRO and SPREP October 2021

and infrastructure, ecosystems, and freshwater resources in particular the northern group islands. Marine heatwaves (MHW) will increase around all small island nations and are projected to be more intense and prolonged. Higher evapotranspiration under a warming climate is projected to partially offset future increases or amplify future reductions in rainfall resulting in drier conditions and increased water stress in the small islands.

B. DEMOGRAPHICS

7. The 2021 Census has the resident population of the Cook Islands at 15,040. Twelve of the 15 islands of the Cook Islands are inhabited and, with the exception of Rarotonga and Aitutaki, the other ten islands have communities of less than 500 people. Key findings of Census 2021 are provided in Figure 1 below.
8. The capital of Avarua is on the main island of Rarotonga which holds more than 70% of the resident population (10,898) and is the site of the major international airport and harbour. Rarotonga is also the administrative centre and the location for the main offices of all the Cook Islands Public Service Ministries and State-Owned Enterprises. The Southern Group Islands have 20% while Northern Group Islands share the remaining 7% of the population. The total population has been in decline since the early 1970s, with a dramatic decline in 1996 as a result of the substantial reduction in the public service in 1996/97.

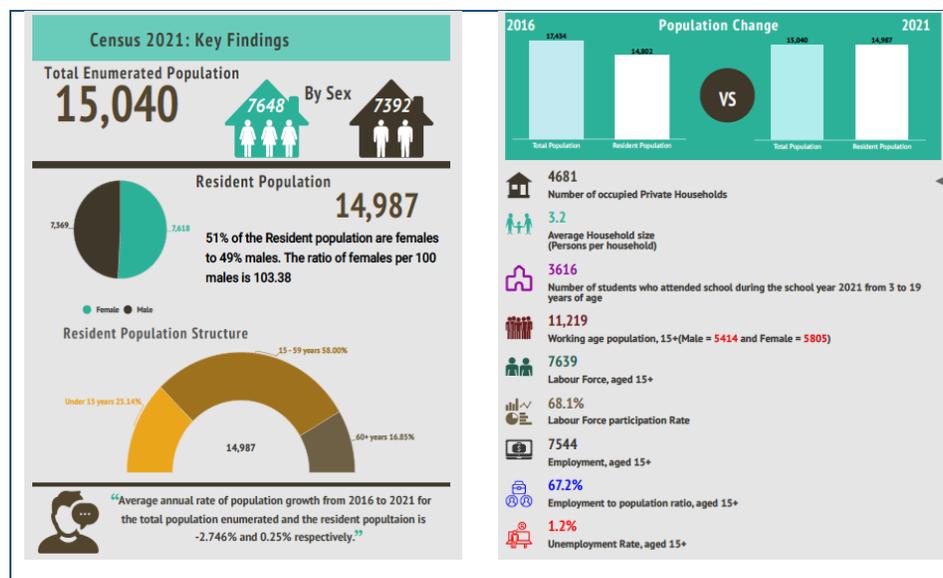


Figure 1 findings of 2021 Census

9. The Cook Islands population structure is characterised by two distinct features. The first is that the 0-4 age group is smaller than the 5-9 group, which suggests a decline in fertility and/or greater emigration from the Cook Islands. The second is a significant decline in the 15-19 age group, which were the 10-14 cohort at the Census in 2011. The likely explanation for this is that young Cook Islanders have completed secondary education and travelled overseas for further education or employment opportunities. This number has improved over the last 10 years with more students aged 15 – 19 taking advantage of tertiary training on island with either Cook Islands Tertiary Training Institute (CITTI), or University of the South Pacific (USP).

10. The declining population is a critical development challenge for the Cook Islands, affecting all sectors and particularly in the Pa Enea. Depopulation, especially the younger generations leaving the Cook Islands, has led to a shortage of skilled workers and increasing reliance on foreign workers. The social and economic development disparities between Rarotonga and the Pa Enea have caused emigration from the Pa Enea to Rarotonga. For the Cook Islands, climate change is another critical issue requiring coordinated policy response from the public sector and civil society to strengthen resilience to climate change, address the mitigation and adaptation measures, food security and sea level rise in the longer term.
11. Tourism is the country's leading source of revenue account representing around 60% of GDP. It plays a vital role in correcting the balance of payments and is a long-term opportunity. Strong growth in tourism in recent years has seen the Cook Islands experience economic growth and progression towards higher levels of economic prosperity. However, the strong economic growth and heavy reliance on the tourism sector means the Cook Islands remains extremely vulnerable to shocks in external markets and natural disasters. If a major tropical cyclone were to hit Rarotonga, it would take time before the tourism industry and the entire country could rebuild as noted in the COVID-19 pandemic where economic activity came to a halt for nearly two years.
12. Cook Islands has a well-developed private sector on Rarotonga and Aitutaki, mostly based around tourism related businesses. Income generation on the remaining islands is predominantly from central and local government jobs with agriculture showing signs of resurgence since COVID-19 lockdowns as well as strong tourism numbers. As New Zealand passport holders, Cook Islanders can move freely to and from New Zealand, and this option is exercised regularly by families looking for employment opportunities as well as seeking better health care services. The country currently gains income from vessels licensed to fish inside the EEZ and from planes that fly through Cook Islands airspace above. The potential for seabed minerals is also being assessed and exploration licenses were offered through a robust licensing process in 2020/2021.

C. INDIGENOUS PEOPLES

13. The Cook Islands Immigration Act 2021 defines a Cook Islander – Section 21 as “A person who is part of the Māori Race indigenous to the Cook Islands.”
14. The MFEM Environmental and Social Safeguard Framework – ESS Standard 7 – also refers to Indigenous peoples and traditional local communities as “tangata enua or people with blood ties to any of the islands in the Cook Islands. The above definitions are the closest we have in classifying people as ‘indigenous people’. There are no separate laws for people of Cook Island decent and other ethnic groups. The funding proposal has been designed so that all people in their various ethnic groups are identified and recognised at inception phase.
15. The law of the country applies to everyone in the country whether they are resident or visitor.
16. Appendix 1 of this Report includes the GCF Environmental and Social Safeguards Screening Checklist (previously Annex 27) that states “Under [*the UN working definition of indigenous peoples*](#), no differentiable indigenous sub-groups exist in the Cook Islands. However, traditional people and communities within the

Cook Islands have been engaged, consulted and contributed to the development of this project” and they are considered indigenous Cook Islands people.

D. AKAMATUTU’ANGA TO TATOU ORA’ANGA MEITAKI (ATOM)

17. Innovative aspects of the **AKAMATUTU’ANGA TO TATOU ORA’ANGA MEITAKI (ATOM)** “*Building a healthy and resilient Cook Islands community - one block at a time*” project builds on expertise in the health sector with the management of climate-sensitive health risks outside of the explicit climate change context. This baseline of experience and capacity can extend the value of the proposed initiative. Further, the project will integrate adaptation activities in disaster risk management to reduce disaster impacts on health. Embedding the project in Te Marae Ora (TMO), Ministry of Health will ensure sustainability, as TMO is responsible for maintaining the effectiveness of the Cook Islands health system. Once climate change is identified as a priority in strategic plans - and relevant standards are appropriately tailored - then managing the health risks of climate change will become part of the core activities of TMO, thereby rendering this a sustainable initiative.
18. The project’s paradigm shift goal is: **IF** the Cook Islands can improve its enabling environment for health in a climate change context, develop tailored interventions to address climate-sensitive health risks, and operationalise community based adaptation measures, **THEN** Cook Islands communities will realise increased resilience to the health consequences of climate change and improved health wellbeing **BECAUSE** determinants of health will be improved and the health system will be more responsive, robust, informed and stable in the face of climate change particularly for vulnerable communities
19. The goal will be achieved via three interlinked components:

Component 1: Strengthening the Capacity and capabilities of the Te Marae Ora, Partners and stakeholders to integrate climate change considerations in their health operations

- Component 1 works to strengthen the capacity and capabilities of the TMO, partners and stakeholders to integrate climate change considerations in their health operations. To do so, outputs and activities are structured to integrate climate change-related risks into health governance, and strengthen health information systems, across three outputs and nine activities.

Component 2: Building Institutional capabilities to respond to climate change and health issues and effectively deliver health services to the population of the Cook Islands

- As the designated manager of crown assets, Cook Islands Investment Corporation holds statutory responsibility for government-owned infrastructure including health facilities such as clinics and hospitals. As part of the country’s National Infrastructure Investment Plan, preliminary assessments of the country’s health infrastructure needs were performed under the ‘Sector Assessment and Candidate Projects’ initiative². These preliminary assessments, in conjunction with data gathered as part of the stakeholder consultation process under the PPF, identified priority health facility infrastructure upgrades focusing on

² Asian Development Bank (ADB). (2021). *Cook Islands National Infrastructure Investment Plan*. Sydney: ADB Pacific Region Infrastructure Facility Coordination Office.

improving plant to meet cyclone building code, bolstering water storage capacity, providing for independent power sources and battery back-ups, and satellite communication improvements as key areas for health system resilience to climate change.

- Component 2 works as well to build institutional capabilities and capacities to respond to climate change and health issues, and effectively deliver health services to the country's population.

Component 3: Resilience building measures to reduce health impacts from climate change in communities

- Component 3 consists of resilience-building measures to reduce the health impacts of climate change at the community level. The programme will bolster existing TMO health outreach and community care activities with the inclusion of measures to address climate sensitive health risks (CSHR). The programme will increase awareness of the impacts of climate change on health in the Cook Islands and include adaptive techniques to reduce CSHRs.
 - It will employ innovative communications tools (including Cook Islands Māori-language programming) to communicate risk reduction options relevant to CSHRs (including heat-related illness, mental health awareness, and respiratory disease prophylaxis), and disseminate/share these knowledge products and evidence-based practices through visual media, school resources, strengthening resilience of our Island communities (SRIC-CC) materials are supplemented and further enhanced.
20. The project will support an estimated 30 communities and 22 health facilities and/or emergency centres in 11 highly vulnerable outer island sites to improve the resilience of health services. Activities will directly benefit an estimated 15,040 people, of whom 7,648 are expected to be women at the end of the project. Indirect beneficiaries will include overseas Cook Islands citizens of 443 females and 428 males during the lifetime of the project as identified in Annex 2 Logical Framework. The project will also work with TMO to incorporate CSHRs into an enhanced health information system, indirectly benefitting the country's entire population. Currently available disaster risk management information from the ADB Disaster Resilience Program classified all 11 inhabited Pa Enea and 10 punas on Rarotonga as having high to very high vulnerability to disasters, including those driven by climate change impacts³. In light of the uniformity of climate vulnerability and disaster risk, beneficiary sites are all TMO and emergency centre facilities in the Cook Islands.
21. The implementing partners Ministry of Education, Cook Islands Red Cross and Ministry of Agriculture along with TMO staff will support a variety of outreach activities on all Pa Enea islands and with appropriate equipment/supplies, promote ecological literacy, and deliver targeted information on CSHRs in a culture- and reo- [Cook Islands Māori language-] affirming fashion . This solution aligns with the 'ensure effective and accessible delivery of health systems' resilience-building strategy, and Goals 1 (Wellbeing for all), 8 (Education and Innovation), and 13 (Cultural Heritage, History, Identity and language) of the NSDA.

E. ENVIRONMENTAL AND SOCIAL SAFEGUARDS LEGAL FRAMEWORK

22. This Annex 12 ESS and ESAP has been prepared to support the funding proposal – ATOM. The project is further supported by the Ministry of Finance and Economic Management (MFEM) in their role as the GCF Accredited

³ Asian Development Bank. 2016. "Cook Islands Disaster Resilience Program: Report and Recommendation of the President." *Project Number 50212-001*. Manila: ADB.

Entity (AE). Thus, the project has been screened as well against the MFEM Environmental and Social Safeguard Framework included as Appendix 2, and GCF Environmental and Social Safeguards Appendix 1. The Cook Islands environmental and social safeguards framework has a number of relevant legislations and policies that have been considered in the development and design of ATOM and are provided in Table 1 below.

23. The funding proposal is consistent with the country’s national priorities, policies and action plans and programs, and is fully consistent with country ownership as a Resilience and Development Priority. This is elaborated upon in several Nationally Endorsed Plans and Strategies that highlight the Health Sector as a priority for Resilience Building.

- The Te Ara Akapapa'anga Nui • **National Sustainable Development Agenda (NSDA) 2020+. 2021–2121**, the Cook Islands social and economic growth plan, clearly outlines in Goal 7 to Improve Health and Promote Healthy Lifestyles, while Goal 13 highlights the need to Strengthen resilience to combat the impacts of climate change and natural disasters. These aspirational goals for our sustainable growth pathway, are also affirmed in the
- Cook Islands Joint National Action Plan on Climate Change and Disaster Risk Management (JNAP2) where in: Strategy 2 – Water and Food Security; Strategy 3 – Environmental Sustainability; and Strategy 9 – Human Health and Welfare, Health Sector related issues and means to address them are recognized and costed at a high-level.
- 2018 Country Program and Climate Change Policy all signal that the critical importance of addressing climate change and emergency preparedness across the health sector is one priority area that needs urgent attention.

24. Applicable Cook Islands safeguard legislation, policies and strategies are provided in Table 1.

Cook Islands Ministry or Agency Responsible	Safeguard Function	Applicable Safeguard Legislation, Policies and Strategies
Ministry of Internal Affairs (MIA)	MIA advances Decent Work principles and standards as a recent member of the International Labour Organisation. By promoting the rights and obligations of employers and employees, businesses can grow sustainably. Promoting and monitoring Consumer protection and Fair trading form another layer of protection offered to our community.	<ul style="list-style-type: none"> • Employment Relations Act 2012 • Cook Islands Occupational Health and Safety Policy Draft 2019 • Cook Islands ratifications of ILO C029, C105, and C182 • National Policy on Gender Equality and Women’s Empowerment and ACTION PLAN 2019 – 2024.

Cook Islands Ministry or Agency Responsible	Safeguard Function	Applicable Safeguard Legislation, Policies and Strategies
	Provide technical advice and expertise in the integration of gender perspectives across government national priorities	
Office of Public Service Commissioner (PSC)	PSC will monitor and require all government agencies to establish and maintain a safe and healthy work environment for employees, contractors and visitors	<ul style="list-style-type: none"> • Public Service Act 2009 • Public Service Amendment No.8 2016 • Occupational Safety and Health Policy 2016 • Code of Conduct Policy GOVERNMENT OF THE COOK ISLANDS <p>Under this government policy, Sexual Harassment is a serious misconduct.</p>
Cook Islands Investment Corporation (CIIC)	<p>CIIC statutory corporation that manages and maintains all government assets</p> <p>Is the Executing Entity that will support the ATOM project to improve the resilience of all Health Centre's in the Cook Islands</p>	<ul style="list-style-type: none"> • Cook Islands National Infrastructure Investment Plan • Draft Occupational Safety and Health Policy
Te Marae Ora (TMO) Ministry of Health	<p>TMO is the main healthcare provider in the Cook Islands responsible for setting national health policy and managing the day-to-day delivery of health services.</p> <p>Health services are delivered through five directorates: Public Health, Oral Health, Primary Care,</p>	<ul style="list-style-type: none"> • Public Health Act 2004 • Cook Islands Health Workforce Plan 2016-2025 • National Water Policy 2016 • Ministry of Health Act 2013 • The Public Health (Sewage and Wastewater Treatment

Cook Islands Ministry or Agency Responsible	Safeguard Function	Applicable Safeguard Legislation, Policies and Strategies
	<p>Hospital Health and Planning and Funding.</p> <p>TMO is the Executing Entity for the ATOM project.</p> <p>TMO Policy prevention and protection from sexual exploitation, sexual abuse and sexual harassment (SEAH)</p> <p>Act to prevent harassment.</p>	<p>and Disposal) Regulations 2014</p> <ul style="list-style-type: none"> • Waste Management Policy. <p>National Infection Prevention and Control Guidelines 2023. Recently approved, but not yet in the public domain.</p> <ul style="list-style-type: none"> • The Cook Islands Integrated National Strategic Plan for Sexual and Reproductive Health 2014 – 2018 • Harassment Act 2017
Cook Islands National Environment Service (NES)	<p>NES was established to protect, conserve and ensure the Cook Islands environment is managed sustainably. NES is primarily responsible for developing policy, enforcing regulations against illegal rubbish dumping, monitoring and enforcing environmental standards in the Cook Islands.</p>	<ul style="list-style-type: none"> • Environment Act 2003 • Sanitation (Wastewater Management) Policy 2016
Ministry of Finance and Economic Management	<p>MFEM created by the enactment of the Ministry of Finance and Economic Management Act (MFEM Act) 1996 at the outset of the Cook Islands Economic Reform Program.</p> <ul style="list-style-type: none"> • Is the GCF Accredited Entity Planning and managing development assistance for the Cook Islands. 	<ul style="list-style-type: none"> • Cook Islands Government Procurement Policy • Tarai Vaka Process Cook islands Activity Management System • Environmental and Social Safeguards Framework (ESSF) Gender Policy and Tools

Cook Islands Ministry or Agency Responsible	Safeguard Function	Applicable Safeguard Legislation, Policies and Strategies
	<ul style="list-style-type: none"> Overseeing the management of strategic Government infrastructural projects 	<ul style="list-style-type: none"> Grant Management Policy and Procedures Anti-fraud and corruption Anti-money laundering and counter terrorism financing policy Grievance Procedure Whistleblowing policy
Office of the Ombudsman	<p>Ombudsman conducts independent and impartial investigations initiated upon receipt of complaints or acting on his own initiative.</p> <p>Responsible for investigating complaints against Government Ministries and Crown Agencies under the</p> <ul style="list-style-type: none"> Ombudsman Act 1984 Official Information Act 2008. Police Act 2012. 	<ul style="list-style-type: none"> Anti-Corruption Committee (ACC) formed in 2011 Anti-fraud and Anti-corruption Policy 2018 – Whistle blower complaints are handled by the Office of the Ombudsman
Infrastructure Cook Islands (ICI)	<p>ICI responsible for a variety of major government capital infrastructure projects across the Cook Islands,</p> <ul style="list-style-type: none"> compliance with the Cook Islands Building Code, Standards and Act operation and maintenance of the Rarotonga Waste Facility 	<ul style="list-style-type: none"> National Water Policy 2016 Cook Islands National Solid Waste Management Strategy 2013 – 2016 under review Cook Islands Building Code 2019 Cook Islands Infrastructure Act 2019

Table 1: Cook Islands Safeguard Legislation, Policies and Strategies'

F. GCF SAFEGUARD REQUIREMENTS

25. The objectives of the GCF Revised Environmental and Social Policy (ESP) (B.BM-2021/18), are to:
- Avoid, and where avoidance is impossible, mitigate adverse impacts to people and the environment;
 - Avoid, and where avoidance is impossible, mitigate the risks of sexual exploitation, sexual abuse and sexual harassment SEAH to people impacted by GCF-financed activities,
 - Enhance equitable access to development benefits; and
 - Give due consideration to vulnerable and marginalised populations, groups, and individuals, local communities, indigenous peoples, and other marginalised groups of people and individuals that are affected or potentially affected by GCF-financed activities.
26. The ESP requires that all projects be screened for their environmental and social impacts, that those impacts be identified, and that the proposed project be categorised according to its potential environmental and social impacts. Regardless in which category a project is screened, all environmental and social risks shall be adequately identified and assessed by the AE in an open and transparent manner with appropriate consultation.
27. The scope of the environmental and social assessment shall be commensurate with the scope and severity of potential risks. The assessment should assess all potential environmental and social risks and include a proposed risks management plan or in this case an ESAP.
28. All projects supported by the GCF shall be designed and implemented to meet the ESP Performance Standards, although not all PS may be relevant to every project, as it is dependent on the nature and scope of the project.

G. SCREENING METHODOLOGY AND INTEGRATION OF ENVIRONMENTAL SOCIAL SAFEGUARDS

Environmental and Social Screening

29. As well as ensuring the GCF Safeguard objectives were met the AE also ensured that its own MFEM ESS requirements were followed.
30. The Cook Islands Tarai Vaka Process (TVP) includes the MFEM Environmental and Social Safeguards Framework (ESSF) was established as part of MFEM Accreditation to the GCF and aligns to the Cook Islands commitment for sustainable development and integration environmental and social considerations into projects. The MFEM ES safeguards have been developed to avoid, minimize, reduce or mitigate negative environmental or social risks and impacts of all projects. Nine standards (Table 2) have been developed to be applied when developing and implementing projects. The standards are designed to help manage the risks and impacts of a project through a risk and outcome based approach. The risks and impacts have been identified in the project concept stage and therefore mitigating, reducing, minimizing and addressing these risks and impacts have been addressed during the full funding proposal development.
31. The nature of the ATOM project objectives and activities will address the identified barriers and root causes (direct and indirect) that inhibit the strengthening of the adaptive capacity of the health sector to climate variability and change in the Cook Islands. Key challenges and barriers include:

- insufficient mainstreaming of climate change risks and responses within the health sector and relevant government agencies;
- limited health system capacity to manage health information and weather and climate early warning systems;
- limited coverage and quality of health services addressing climate-sensitive health outcomes (especially in remote / Pa Enua areas), and climate-induced disruptions in health care facilities

MFEM Environmental Standards	Level of Risk	Description
ESS1 Assessment and Management of environmental and social risks and impacts.	No/Low	There will be no impact on the environment as all activity will be with the current footprint of the buildings being renovated – all new equipment and repairs and maintenance will have no health risks to anyone
ESS 2: Labour and Working Conditions	No/Low	There will be minimal impact for labour and working conditions - Implementing entities will promote sound worker management relationships and enhance the development benefits of the project – ensuring equal access to work and provide safe and healthy working conditions
ESS 3: Resource Efficiency and Pollution Prevention	No/Low	Impact of the proposed project on the degradation of natural resources, and address resource efficiency and pollution prevention throughout the project cycle
ESS 4: Community Health, Safety and Security	No/Low	Addresses health safety and security risks and impacts on communities that may be affected by the project and for implementing entities to avoid or minimise risks and impacts
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	No/Low	Risks associated physical and economic displacement on land acquisition or restrictions on land use undertaken or imposed in connection with project implementation.
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	No/Low	Risks regarding adverse impacts that potentially affect biodiversity or habitats
ESS 7: Indigenous People and Traditional Local Communities	No/Low	Protection of households from forced eviction and minimization of any social and economic impacts from land restriction or resources use restrictions that may arise.
ESS 8: Cultural Heritage	No/Low	Likely risks or impacts on cultural heritage located in or near the project site and ESS8 is designed to support the conservation management and use of cultural heritage.

MFEM Environmental Standards	Level of Risk	Description
ESS 9: Stakeholder Engagement and Information Disclosure	No/Low	Implementing entities will engage with stakeholders throughout the project life cycle and prior to implementation of project components on each of the islands.

- Table 2. MFEM ESS safeguards standards

H. CATEGORIZATION

32. The funding proposal is designed to both prepare for and respond to climate change-induced health risks in the Cook Islands, through the pursuit of three Components. Within each outcome, a tailored set of activities are defined to address climate health risks, focusing on mainstreaming climate-related risks and resilience into health policy frameworks; strengthening the capacity of the health system to manage climate-related risks; improving coverage and quality of health services addressing climate-related diseases and reducing climate-induced disruptions of health care facilities; and implementing resilience measures to reduce the health impacts of climate change at the community level.
33. The Environmental and Social Screening (ESS) as it applies to the **ATOM** project was assessed during concept stage and screened during design and level of risk against each of the standards is provided in Table 4. All environmental and social risks and impacts for the funding proposal were identified and the assessment assigned was Category C which means the project has low or minimal risk. Any succeeding or subprojects that are identified during the project implementation will be limited to category C activities and having minimal to no adverse environmental and social risks/impacts.
34. During the Concept stage of the Tarai Vaka Process, projects are assigned to one of three classifications reflecting the level of risk and impact and the type of Impact Assessment that is required. This is outlined in Table 3 below.

Category ¹	Degree of impact by Activity	Assessment required
A	Significant adverse impacts that are irreversible or unprecedented, and which extend beyond the physical footprint of the Activity	Environmental Significance Declaration (ESD). Comprehensive Impact Assessment and Impact Management Plan
B	Site-specific adverse impacts that may be prevented or mitigated	ESD completed Impact Assessment and Impact Management Plan covering adverse impacts only
C	Minimal or no adverse impacts	No further action

Table 2 Tarai Vaka Concept Impact Assessment

35. Appendix 1 GCF Environmental and Social Screening Checklist was completed using the revised GCF (B.BM-2021/18) Environmental and Social policy (ESP) to appropriately screen and analyse potential environmental risks and social implications. The eight GCF Performance Standards were evaluated during project preparation. All standards were assessed with each of the standards showing a no to minimal rating in accordance with the Category C risk ranking.
36. SEAH initial screening through discussions with TMO and CIIC suggests that there is limited likelihood SEAH to occur. The initial screening also included the GCF Screening Checklist attached as Appendix 2 Potential SEAH risks will be in screened in line with Public Service Act requirements and in compliance with PSC manual and Code of Conduct Policy. During implementation the SEAH checklist as required will be developed. The responsibility to ensure that SEAH is managed appropriately is the responsibility of the AE, TMO PMU Project Manager and CIIC Project Coordinator to ensure early screening of potential or likely SEAH occurrences are limited or non-existent. The AE as part of its Re-Accreditation is revising and developing additional policies to ensure compliance with GCF policies and procedures, this includes the integration of SEAH and GBV standards and measures as part of the ESSF and the development of an action plan. The AE will also coordinate the PMU to:
- Continually screen, monitor and report as needed issues related to social and environmental risks including SEAH, which will utilise the GCF SEAH Screening checklist until such time the MFEM revises and adopts its updated ESSF.
 - Raise awareness on the ESAP, SEAH matters and the ATOM GRM, including how to and when to report incidences with full contact details to ensure early interventions and actions are prioritized. This will build an internal culture of safeguarding the vulnerable groups but also encourage free and open discussions with and between all stakeholders.

I. ANALYSIS OF RESULTS

37. Early screening of the project combined with further analysis has identified the proposed project as Category C, which suggests that the project contains activities with minimal to no environmental and/or social risks and impacts due to the nature and small scale of works with all readily addressed through mitigation measures.
38. GCF Environmental and Social Screening Checklist (**Appendix 1**) has been completed and all risk factors considered. For all criteria applicable to the project there is a response of **NO** to all questions. The analysis provided below indicates that there may be potential impacts from project activities and are included in the Environmental and Social Action Plan (ESAP).
39. The Project validates the Category C (low risk) assessment as a result of the Environmental and Social Screening, which included a project development discussion, stakeholder meetings and a review of viable choices. The proposed project has little or no environmental or social risks or consequences. Furthermore, any minor risks or consequences discovered can be readily avoided by using basic management actions. An environmental and social action plan was needed under the Green Climate Fund (GCF) Revised Environmental and Social Policy (the ESP) (B.BM-2021/18) to appropriately screen and analyse potential environmental and social implications.

40. Potential impacts are limited to the project footprint

The identified impacts link directly to actions being implemented by the project. These impacts are thus limited to the project footprint. Thus, while the project is intended to support systemic change that can be scaled up any failures in implementation that could result in additional negative impacts are not identified as having a risk of spreading beyond the project areas. E.g. might include delays in materials and building construction timelines stretched.

41. Potential adverse impacts can be addressed by the use of recognized good management practices

The most likely or potential risks identified are linked to installation of and upgrades including UV sterilizing equipment, improved rain guttering, PE water storage tanks, and membrane filters (plus consumables) roof-mounted solar PV arrays and battery backups for continuous power during extreme weather events and local power cuts. As well as environmental laboratory testing and mobile testing which may involve use of chemicals and associated wastes may have potential OHS, or community risks however these are considered low risk. It is recognised that the small scale works as well as chemical waste typically trigger occupational health and safety impacts, which are considered minimal and can effectively be managed through well utilized management practices including effective planning of activities and training on the job with all staff at the health Centre. All other risks can also be effectively managed through a standardized project management structure.

J. EXCLUSION LIST

42. The following are exclusions applicable to the project as it has been applied and will be applied to those to be identified during implementation are include in Table 4 below

Excluded Activities	
Activity Category	Description
Any	Any Activity that will lead to involuntary resettlement or land acquisition (including non-physical displacement and involuntary restrictions to economic activities and land use)
Any	Any Activity that will lead to negative changes to legitimate tenure rights
Any	Any other activity that during the implementation, would lead to medium or high environmental or social risk, including IP risks, as per GCFs SAP Risk Screening
Any	Introduction of any species which have the potential to become invasive including GMO's
Any	No disturbance of any kind will be undertaken where there are asbestos-containing materials

Infrastructure	Construction, maintenance or rehabilitation of dams.
Any	No resettlement, dispossession, land acquisition and economic displacement of person and communities.
Infrastructure	Construction or rehabilitation of rural roads
Equipment	Any photovoltaic equipment from countries who have NOT ratified the ILO Forced Labour Convention 1930 (No. 29) and the Abolition of Forced Labour Convention, 1957 (No. 105).

Table 3 Excluded Activities

K. SUB-ACTIVITY SCREENING

43. As part of their Accreditation Status MFEM and its Accreditation Master Agreement MFEM implement all projects and programmes according to their own Environmental and Social Framework and policies, through a screening and management process on which their category C GCF accreditation was based. To ensure that all ongoing environmental and social screening of ATOM activities as they are further developed, continue to capture all potential impacts that are outside the Category C rating. The sub-activity ESS screening is attached as Appendix 2
44. In addition MFEM is currently revising its suite of policies and tools to further enhance the policies for MFEM Re-accreditation. These policies and tools are expected to be revised by March 2023 and will also include strengthened environmental and social safeguard screening with a gender equity, SEAH and Human rights checklists

L. INTEGRATION OF ESS MANAGEMENT

45. MFEM as the AE and TMO and CIIC as the Executing Entities (EE's), are responsible for ensuring that the requirements of this ESAP are fully integrated into the Project. The MFEM (AE) and TMO and CIIC (EE's) will:
- ensure that all relevant implementing parties (Ministry of Education, Ministry of Agriculture, Cook Islands Red Cross) are sensitized on aspects of the plan and receive appropriate training to fulfil their individual environmental and social responsibilities;
 - Ensure that the necessary resources and skills are retained to successfully carry out all mitigation measures
 - Ensure that the Project Manager will have relevant environmental and social safeguard experience and risk management
 - Formally monitor and report on the environmental and social performances of all activities will be supported by the Monitoring Officer who will work in the PMU and support technical staff in sub-activity screening and monitoring ESAP implementation.
 - Require ESS screening of all activities prior to implementation of sub activities and approval of the screening from the Accredited Entity

- Require that implementing parties manage their environmental and social performance in line with this ESAP.
 - The AE will also coordinate the Project Management Unit (PMU) to:
 - Continually monitor and report as needed issues related to social and environmental risk
 - Raise awareness amongst target communities on this ESAP and the project Grievance Redress Mechanism (GRM).
46. The ESAP shall form part of any procurement documentation and Terms of Reference (TOR), and it shall be the AE's responsibility to ensure that all procurement documents and contractual specifications are subject to review against this ESAP to ensure that all appropriate safeguard measures are captured at the bid stage and in all contracts.
47. It is further the responsibility of the AE to ensure that this ESAP is considered in review of any TOR for Technical Assistance developed for the Project. The safeguard requirements for any design or supervision of the Project will be fully integrated into TOR to ensure that all safeguard responsibilities allocated within the ESAP are realized at the tender stage.
48. In this way, the ESAP will be fully integrated within the Project so that the required measures will be fully appreciated by all responsible parties and successful implementation will be achieved.
49. It is also the responsibility of MFEM as the AE to ensure that this project is aligned and in compliance with the GCF Revised policy on the prevention and protection from sexual exploitation, sexual abuse and sexual harassment (SEAH). The Cook Islands Policy documents that align with SEAH is *The Cook Islands Integrated National Strategic Plan for Sexual and Reproductive Health 2014 – 2018* Priority Area 5 Family planning, reproductive health and gender-based violence is covered and where the area has one or more goals associated with it, to which specific objectives and activities are attached. This policy clearly outlines a framework for Cook Islands women sexual and reproductive health care needs can be addressed. This theme recognises the specific needs of women and girls in making sexual and reproductive health decisions, and the importance of directing education and interventions to them. Specifically, Goal 5B: Agreed protocols and procedures for service delivery, reporting and referral are in place for cases of gender-based violence and related activities. The services for victims of gender-based violence should be fully integrated into the health programme.
50. The Cook Islands Code of Conduct also aligns with the GCF SEAH Policy, and any infringements are considered serious misconduct.
51. Although most of the objectives and activities of the Integrated National Strategic Plan on Sexual and Reproduction Health are beyond the scope of this project the current framework provides positive signs that Cook Islands is committed to the prevention and protection of women from sexual exploitation, sexual abuse and sexual harassment (SEAH) irrespective of gender.
52. The policy and activities however could provide an appropriate work schedule that would allow for interventions where reporting of harassment and sexual abuse is documented and managed by the Programme Manager and senior TMO staff.

53. *Harassment Act 2017 is the only Act that makes provision for a person who applies for an order under this Act on his or her own behalf if a person harasses another person - For this act the meaning of specified act has the same meaning as stalking in the Family Protection and Support Act 2017. The object of this Act is to provide greater protection to victims of harassment by (a) recognising that behaviour that may appear innocent or trivial when viewed in isolation may amount to harassment when viewed in context and (b) ensuring that there is adequate legal protection for all victims of harassment. The Act aims to achieve its object by (a) Making the most serious types of harassment criminal offences (b) Empowering the court to make restraining orders to protect victims of harassment and (c) Providing effective sanctions for breaches of the criminal and civil law relating to harassment. Both these documents demonstrate a level of commitment by the Cook Islands to ensuring*
54. TMO is also familiar with WHO efforts on the prevention of and response to sexual misconduct (PRS) and WHO's Three-Year Strategy has recently been discussed at the recent WHO 74th Western Pacific Region meeting in October 2023. The Strategy has yet to be submitted for endorsement by member states for a work plan to move it forward. Once this is undertaken and WHO will provide a work plan for guidance to member countries and Cook Islands will be in a better position to review existing policies and legislation to meet WHO guidance documents.

M. ENVIRONMENTAL AND SOCIAL ACTION PLAN

55. The Environmental and Social Action Plan (ESAP) indicates that the potential impacts identified through the ESS Screening are low in both risk and significance. However, industry best practice should be followed during the in-situ upgrades, and equipment installation phases of the programme. It contains the management measures for the identified suite of activities for the ATOM project as well as instructions for ongoing environmental and social screening of community-level interventions as they are selected and developed.
56. Professional oversight will be engaged to ensure best practice is followed. Proper planning and management of potential generated waste streams will be undertaken. Community health, safety and security guidelines will be followed for all physical interventions. Labour and working conditions and equal opportunities will be encouraged. The value of the improvements to health services and improved community resilience means that the overall environmental and social impacts of the programme will be positive.
57. In addition, this section provides guidance to the AE and EEs on how to ensure environmental and social safeguards are integrated into technical advisory activities. This ensure that all contracts, Terms of Reference, policies, plans, frameworks, etc developed under this project are screened to ensure that the development process and the recommendations follow the GCF environmental and social safeguard principles. Such screening will utilise Appendix 2 MFEM Environmental and Social Screening template.

The Environmental and Social Action Plan (ESAP) matrix prepared for the Funding Proposal.

Due to the nature and scale of the proposed activities, the environmental and social risks are considered ‘low’

Table 4 ESAP for ATOM

Proposed Project Activities	Identified risks	Risk	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost***
All construction-based activities	All construction activities associated with the risk of SEAH incidences due to a lack of worker sensitization.	2	All workers will be sensitised on existing national, and local if applicable, legislation, ESAP and GCF policy related to SEAH. Monitoring of SEAH incidences will be included in the Grievance Redress Mechanism, as outlined in this document.	Executing Entity CIIC Project Manager PMU	Mitigation measures to be integrated into the planning/design of activity – within the project timeline	Workers are sensitised on national legislation, ESAP and GCF policy related to SEAH. General safety and care concerning SEAH is heightened. SEAH incidences are included in the Grievance Redress Mechanism.	
Executing Entity CIIC Activity 2.1							
In-situ upgrades work on site on island locations – improvements to health facilities and emergency centres	Waste generation streams from waste materials including discarded materials. Aggregate and concrete waste will be reused as	2	Waste streams to be separated recyclable or reusable materials reused on island and if not prepared for delivery to Rarotonga. Hazardous waste prepared for transport to Rarotonga	Executing Entity CIIC Project Coordinator Executing Entity TMO And TMO Directors	During implementation And ongoing training on correct waste stream disposal requirements	A well run and clean construction with waste streams identified for disposal or reuse	NA

Proposed Project Activities	Identified risks	Risk	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost***
	<p>roading material or footpaths</p> <p>Occupational health and safety risks for workers involved with construction and building equipment</p> <p>Installation of Equipment for Health Centres</p>	<p>2</p> <p>2</p>	<p>Reviewing and training in Waste Management Policy and National Infection Prevention and Control Guidelines 2023. Recently approved, but not yet in the public domain.</p> <p>Health and safety requirements to be written into contracts.</p> <p>OHS trainings with all project workers</p> <p>Staff will receive appropriate equipment for their activities including specialised equipment as needed</p> <p>Staff will receive the necessary PPE and training on appropriate use and wear if required</p> <p>Training on island during installation and ongoing training on best practice usage</p>		<p>During Inception phase and ongoing consultations and training during implementation</p>	<p>Happy employees working in good safe conditions</p> <p>Effective installation and training provided by supplier or senior TMO Staff</p>	

Proposed Project Activities	Identified risks	Risk	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost***
Install PV Solar and Hot Water Systems for Health Facilities	Supply Chain Issues and potential for the use of forced child labour in the supply chain of these systems. Cook Islands is fully aware of the procurement of these systems and for the past 5 years has undertaken supply of solar systems to all Pa Enea Islands which now have standalone solar systems to generate power	2	Supply Chain will only be from countries <i>who have ratified the ILO Forced Labour Convention 1930 (No. 29) and the Abolition of Forced Labour Convention, 1957 (No. 105). Cook Islands has a robust procurement Policy that will require further strengthening to ensure suppliers are assessed against stringent criteria as set out in previous solar and battery procurement arrangements⁴ with the ADB.</i>	Executing Entity CIIC Project Manager CIIC Project Coordinator Executing Entity TMO	During Inception EOI from suppliers of Solar PV and Government will confirm and approve all suppliers	Supply chain issues managed and resolved early	
	E-Waste and hazardous waste generation due to electrical repairs and installation of Solar and hot water systems	2	Waste including e waste and hazardous waste will be managed under the Waste Management Policy Workers will receive adequate training on the use of technology and equipment				

⁴ On reviewing the Purchase and Sale of Goods and Services Policy (2016), ESS risk assessment should include: *The tender evaluation team should conduct a risk assessment for each tender submitted. This will identify the most significant risks presented by the tender and consider the likelihood of the risk occurring; the consequence of that risk; and a risk mitigation strategy. In conclusion, the mitigated risk will be determined to form an overall measure of the risk represented by each tender. The risk mitigation strategy may include the inclusion of specific clauses in the executed contract. Therefore, a Tender considered to be High Risk might still be selected subject to the Tenderer's willingness to accept the proposed contract amendments*

Proposed Project Activities	Identified risks	Risk	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost***
	Electrocution and mechanical risk for workers	2	including the necessary equipment and the use of PPE End of life treatment of panels. Recycling investment currently sits with the supplier of panels. Only specially trained personnel will work with live electricity and all workers will receive appropriate PPE and equipment for their role				
Water Sanitation and Hygiene systems upgraded to be climate resilient.	in-situ upgrades and contamination risk	2	Water management program implemented during construction essential – ensure that separate water storage is proposed for the project.	Executing Entity CIIC Project Coordinator	During implementation	Water available when required	NA
	Hydroponic systems and wastewater discharge risk ⁵	2	The systems are extremely small units that are housed at the schools to improve	Executing Entity TMO Project Manager, TMO Directors and Staff	Mitigation measures to be integrated into the planning/design of activity within the project timelines	No incidence of chemical spillage or	

⁵ Hydroponic systems as a new technology for schools under **Akamatutu’anga Kia Tukatau te Ora’anga ite Pa Enuu” Pa Enuu Action for Resilient Livelihoods (PEARL) 2018 Adaptation Fund.**

Proposed Project Activities	Identified risks	Risk	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost***
	Component 3.2 Chemical spillage and exposure to staff	2	<p>diets and provide greens for school lunches in the Northern Group islands. Water discharge from the hydroponic system will be very low risk and reused for other outdoor gardens</p> <p>Water is a precious commodity in the Northern group and reuse is common practise. Hydroponic systems recycle and reuse water, which minimizes waste and uses less water than traditional, soil-based farming methods.</p> <p>Policies adopted for the correct handling and storage of chemicals Training on safe handling, disposal and storage of chemicals provided by senior TMO Biomedical Staff</p>		As required and refresher courses and training when new stocks of Chemicals are purchased	storage incidence reported	
	Potential for women to be inequitably treated or disadvantaged during decision making and	2	Any potential of gender inequality to be identified in Gender assessment and mitigated with Gender Action Plan.	Accredited Entity TMO - EE CIIC - EE PMU Project Manager	Consultation on islands prior to construction Employment notice that women	Gender balance in employment and women's participation increased	NA

Proposed Project Activities	Identified risks	Risk	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost***
	employment opportunities.		<p>Include trainings as referenced in Section 12 below</p> <p>GRM will be formalised to report incidence or inequitable treatment and complaints and or grievances. Procedures for reporting, and when and how these grievances will be managed.</p> <p>Regular communication on GRM procedures to stakeholders and beneficiaries carried out</p>	Gender Specialist, Communication Specialist	<p>may apply for positions.</p> <p>Full disclosure of GRM policy and procedures to be advertised in first 3 months of project implementation</p>	Quarterly Reports will show no. of grievances reported and resolved.	
Monitoring and Reporting	Monitoring and Reporting						
Regular Reporting on implementation of ESAP	<p>Lack of qualified personnel for regular monitoring and reporting</p> <p>Travel arrangement to Pa Enuu limited.</p> <p>Personnel fail to follow and understand policy</p>	1	Update Quarterly report implementation of ESAP	<p>Accredited Entity</p> <p>TMO - EE</p> <p>CIIC - EE</p> <p>PMU Project Manager</p> <p>CIIC Project Coordinator</p>	<p>Prior to implementation and signed FAA</p> <p>Quarterly reporting status of ESS Action Plan</p>	GCF accept reports and mitigation of risks shows little or no impact.	NA

Proposed Project Activities	Identified risks	Risk	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost***
	procedures for GRM and SEAH						
Grievance Mechanism SEAH Risk Screening		1	Prepare and Adopt Project level GRM Undertake trainings on what is GRM Training provided for all PMU staff on SEAH Policy and tools to identify risks to vulnerable especially perpetrated by men against women and girls as well as boys and other gender identities	Accredited Entity TMO - EE CIIC - EE PMU Project Gender specialist	At inception 6 monthly training or as required prior to construction starting Quarterly reporting of GRM complaints or grievances and trainings held.	No grievances received and/or adequately managed and resolved	NA

Proposed Project Activities	Identified risks	Risk	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost***
Community Consultations		1	Prepare Consultation Plan for each Island prior to implementation of ATOM project and continue throughout the implementation of the project	Accredited Entity Executing Entities Project Manager and Communications Specialist	At inception and all throughout the implementation of the project and held as required at commencement of Activities that will involve community understanding and awareness during implementation of components 2 and 3	Full disclosure at all community consultations and communities fully engaged and aware of all project activities.	NA

*Risk significance key:

1 (Negligible) - Negligible or no adverse impacts on communities, individuals, and/or environment.

2 (Slight) - Very limited impacts in terms of magnitude (e.g. small, affected area, very low number of people affected) and duration (short), may be easily avoided, managed, or mitigated.

3 (Moderate) - Impacts of low magnitude, limited in scale (site-specific) and duration (temporary), can be avoided, managed and/or mitigated with relatively uncomplicated accepted measures.

4 (Severe) - Adverse impacts on people or environment of medium to large magnitude, spatial extent and duration more limited than level 5 (e.g. predictable, mostly temporary, reversible). The potential risk impact may affect the human rights, lands, natural resources, territories, and traditional livelihoods of indigenous peoples are to be considered at a minimum potentially severe.

*** Costs for the ESAP have been included in the overall budgets for Project Management Unit and Project Co-ordination Unit with CIIC.

N. ENVIRONMENT AND SOCIAL SAFEGUARDS TRAINING

58. The PMU and PCU and the implementing partners will require training to ensure effective implementation and oversight of the ESAP including further ESS screening of sub-activities if required.

59. Areas recommended for training include:

- GCF ESS policies in particular areas requiring further screening - sub-activities using TVP ESS screening as well
- Roles and responsibilities of different key agencies in social safeguards implementation
- Health and Safety requirements for physical works
- Island Emergency Preparedness Procedures
- How to effectively integrate the ESAP into project management, implementation, monitoring and reporting
- Publicity and Management of the GRM
- SEAH awareness
- How to facilitate meaningful participatory planning of community consultations

60. Other specific mitigation measure trainings

- Installation of hot water solar equipment
- Water management program during construction agreed with community
- Equal treatment of men and women in all areas of the Project
- Managing the storage, use and disposal of chemicals
- Hazardous waste management
- Island Emergency Management procedures

O. ESAP ROLES AND RESPONSIBILITIES

Details of the roles assigned to the various agencies and organisations are summarised below.

61. Accredited Entity

The Ministry of Finance and Economic Management is the AE for this project and provides support to the Executing Entities –TMO and CIIC. MFEM is fully responsible (legally and financially) for the implementation of this project including the safeguard standards required by the GCF. The AE:

- Acts as a focal point for communications with the GCF on project related matters:
- Ensures compliance with GCF funding requirements, including safeguard compliance
- Provide capacity building trainings to EEs in the application, screening and monitoring of environmental and social safeguards, including GRM and SEAH trainings.
- Provide additional technical capacity to the EEs where required

- Updating the ESAP as necessary to reflect changes in the designs
- Ensure that GCF project activities are screened and assigned appropriate environmental and social risk categories and that the environmental and social risks and impact are properly and sufficiently assessed.
- Ensure that measures to avoid minimize or mitigate adverse impacts are planned and adequately supported in GCF project activities.
- Ensure that every GCF-funded project implements and makes publicly available to all a grievance redress mechanism
- Ensures every GCF funded project complies with the GCF Information Disclosure Policy
- Conduct due diligence on all partner organisations, including Ministry of Agriculture, Ministry of Education and Cook Islands Red Cross to ensure that they can and do comply with the GCF ESP is included in each project design.
- Ensure that the GCF ESP for each project design supports meaningful and inclusive multi-stakeholder consultation and engagement through the lifecycle of activities
- Ensure cooperation with GCF in its due diligence of the activities proposed for GCF funding.

62. Project Management Units

63. There will be two executing entities for ATOM:

- TMO Project Management Unit (PMU) will be the executing entity for the major components and activities of the project and will coordinate these activities with three implementing partners Ministry of Education (MOE) Output 1.3 and Red Cross Output 3.2 and 3.3. and Ministry of Agriculture 3.2
- CIIC Project Coordination Unit (PCU) will be the executing entity and implementing entity for output 2.1 only.

64. Both entities will have the responsibility to oversee the implementation of the identified project components and activities. The EEs will monitor and evaluate project activities and outputs and will report findings to the Accredited Entity, through quarterly and annual reports or on a case-by-case basis. The PMU and PCU will draw on technical expertise from executing and implementing entities. And will be responsible for ensuring compliance with the ESAP and GCF and AE ESS Policies and requirements at the project level.

65. All contracted positions for each executing entity will align with GCF and MFEM's Gender Policy, and Environment and Social Safeguards Policy. Due attention will be given to gender equity and environment and social consciousness. Complete confidentiality in line with the Public Service Commission Policy will be adhered to during recruitment.

66. The programme has been designed to ensure that each project component will contract technical specialists who will be responsible for driving the respective output activities identified in the proposal. The Executing Entities will be responsible for the recruitment of the professional services

in consultation with implementing entities. Recruitment will be in accordance with the OPSC recruitment policy and Cook Islands government procurement policy. Full descriptions of the positions will be developed in consultation with MFEM, TMO, CIIC and the implementing entities.

67. Implementation and monitoring of the ESAP will be the responsibility of the Project Manager who will have qualifications in Environmental and Social Safeguards and will be supported by the Monitoring officer who will also have expertise and qualifications in Environmental Social safeguards.
68. It is important to note that CIIC, TMO and DCD have existing staff who have already received Environmental and Social Safeguard training carried out by MFEM and ADB. The AE will continue its ongoing training modules and ensure that all executing entities and implementing partners undertake and complete the training modules.

69. Project Steering Committee

70. The Project Steering Committee (PSC) will act as an advisory body to the project providing budget accountability, project guidance, policy input and support. The PSC ensures project alignment to national priorities and endorses key management decisions of the project and will play a critical role in assuring the technical quality, financial transparency and overall development impact of the project. The PSC will meet quarterly and will endorse receive and consider work plans, quarterly and annual reports. The PSC will be composed of designated senior-level representatives from

- Office of the Prime Minister (includes NDA Cook Islands Climate Change, EMCI)
- MFEM, the accredited entity
- TMO, executing entity
- CIIC, executing entity
- Cook Islands Red Cross Society
- Maraurau o te Pae Api'i, Ministry of Education
- Ministry of Agriculture

The PMU will be the secretariat for the PSC.

71. Implementing Partners / Contractors and Consultants

All implementing partners, contractors and consultants are required to comply with the ESAP, MFEM ESSF and the GCF ESP. they will be required to work with the PMU to ensure meaningful community and stakeholder engagement in their work programmes and plans

P. ENVIRONMENTAL AND SOCIAL ACTION PLAN IMPLEMENTATION AND MONITORING

72. ESAP monitoring reporting will follow the GCF Monitoring and Accountability Framework (MAF) for Accredited Entities¹ and MFEM Environmental and Social Safeguard Framework (ESSF) Quarterly

reports (3 quarterly reports to replace 3 monthly reports) for quarters one (January to March), two (April to June) and three (July to September). Quarter two report shall include the six-monthly GAP³ (Gender Action Plan) and Environmental and Social Safeguards Action Plan (ESAP) report.

73. Annual project implementation review report⁴ (annual report to replace 1 quarterly report) the annual report shall include the annual GAP and ESAP report. MFEM will use this annual report for preparing and submitting annual performance reports (APRs) to GCF, including annual audited financial reports with MFEM supervising the independent external auditor.
74. Project completion report (project completion report to replace last annual project implementation review report).
75. These activity reports will be fully developed by an international monitoring and evaluation (M&E) consultant which must provide adequate information against the results framework (theory of change) considering means of verification of project specific indicators involving primary and secondary data collection, analysis, and reporting and relevant stakeholders in line with GCF MAF, Integrated Results Management Framework (IRMF) and Evaluation Policy.
76. This will help to gauge whether the project is proceeding as planned, and to make good management decisions. In addition, the M&E consultant will train and guide the PMU project staff particularly the monitoring officer, who will implement the internal monitoring and reporting system, and the gender/safeguards specialist who will ensure GAP indicators are included in the MAF.
77. MFEM shall supervise the mid-term and final evaluations. The mid-term evaluation shall be conducted in the middle of Year 3 (i.e., month 30) with, procurement for an independent external firm shall commencing in month 27 to enable the mid-term evaluation to be completed by month 33. The final evaluation shall be conducted starting in the last quarter of Year 5 (i.e., month 59). These evaluations should also assess the performance of the funded activity against the GCF investment framework criteria, including financial/economic performances as part of the project efficiency and effectiveness criterion.
78. All ATOM monitoring and reporting including ESS reporting are required to use templates developed under the ATOM project. All reporting will be quarterly including GCF annual performance reports. The ESS Standard Screen template that will be used for sub-activity ESS screening during implementation is provided as **Appendix 2** of the Report. Project Manager/Project Coordinator and National Monitoring Officer with the International Gender Safeguard Specialist will be responsible for monitoring the project and reporting compliance. This will include:
 - Outcomes of any additional ESS screening or assessments
 - Status of management measures of the ESAP and whether they are being implemented effectively
 - Summary of any community consultations
 - Summary of any grievances received in the GRM

79. Evaluations enable knowledge to help make decisions that improve the quality of activities for the second half of the project or any scale-up opportunities, inform government policies, strategies and increase the effectiveness of development initiatives in the Cook Islands. It also provides accountability and transparency to stakeholders and on cross-cutting issues like gender and safeguarding. These evaluations should also assess the performance of the funded activity against the GCF investment framework criteria, including financial/economic performances as part of the project efficiency and effectiveness criterion.

Q. POLICY AND PLAN DEVELOPMENT

80. Any activities which require development or updating of policies and plans will follow this ESAP including activities in the Gender Action Plan to ensure that all affected parties are engaged in the process of development and that broader impacts on gender, environment and social safeguards are considered. Table 6 below identifies the project activities from Annex 2a Logical Framework that will be considered during project implementation and take into account areas that require ESAP or Gender inputs.

Project Activities	Description
Activity 1.1.1: Conduct a baseline assessment regarding existing legislation, policies and plans of Te Marae Ora to identify and evaluate strategies and indicators to address climate sensitive health outcomes.	Conduct a gender sensitised policy assessment around CC&H at TMO, and any other line ministries / central government with relevant policies/plans
Activity 1.1.2: Draft update to Climate Change and Health Adaptation Plan 2012	Update CC&HAP to align with governmental / TMO policies and national legislation
Activity 1.1.3: Update TMO policies, plans and procedures to include climate-sensitive health risks	Update relevant TMO policies, plans and processes to incorporate gender sensitised CSHRs
Activity 1.1.4: Development of TMO communications strategy and implementation plan	Overarching national gender sensitised CC&H communications strategy and implementation plan developed
Activity 1.2.1: Assess health intelligence needs to integrate CSHRs	Assess TMO HIS needs and develop strategy for the incorporation of CSHR forecasting functionality
Activity 1.2.2: Develop a data management and dissemination system for augmented health intelligence incorporating CSHRs	Operationalize enhanced HIS, with functionality in health EWS and CSHR forecasting, and disseminate findings to wider health system
Activity 1.2.3: Conduct TMO analyst training and train staff in hospitals and clinics in augmented health intelligence	Majority of TMO HIU and coding staff trained in augmented health intelligence

Project Activities	Description
Activity 1.3.1: Develop targeted gender sensitised CC&H curriculum to increase capacity of health sector workforce	Create CSHR / health EWS/DRR training programme
Activity 1.3.2: Deliver gender sensitised CC&H educational programming, environmental health training, and other professional development at TMO	Deliver CSHR/CC&H-specific CME/CPE
Activity 2.1.1: Complete detailed technical design for improvements to health facilities to achieve CC resilience	Perform assessment and design for improvements to health facilities and emergency center physical infrastructure, in line with WHO guidance for climate resilient and environmentally sustainable health care facilities
Activity 2.1.2: Upgrade and provision health facilities to achieve CC resilience	Implement improvements delineated in 2.1.1
Activity 2.2.1: Provide TMO headquarters with high availability IT infrastructure for HIS and health intelligence	TMO HQ IT infrastructure back-up infrastructure installed
Activity 2.2.2: Supply health facilities with resilient information systems to ensure uninterrupted health services before, during and after extreme weather events	TMO Pa Enea IT infrastructure back-up installed
Activity 2.3.1: Assess mobile laboratory testing equipment needs	Mobile laboratory testing equipment needs assessment completed
Activity 2.3.2: Provide mobile environmental testing kits to assess water quality	≥16 mobile laboratory microbiology test kits for selected CSHRs procured
Activity 3.1.1: Augment existing HPO/EHO manuals and tools to integrate indicators on CSHRs	Existing Health Protection Officer / Environmental Health Officer and/or Tutaka manuals updated
Activity 3.1.2: Train HPOs/EHOs in the use of augmented tools	EHOs/HPOs/Tutaka from ≥11 Pa Enea sites trained in the use of augmented manuals and tools
Activity 3.2.1: Communicate risk reduction options relevant to CSHRs and disseminate/share evidence-based practices	≥4 Vaka outreach voyages completed
Activity 3.2.2: Design and implement non-clinical health and wellbeing activities to address CSHRs	Non-clinical CSHR-specific health and wellbeing activities implemented in ≥11 Pa Enea sites + Rarotonga

Project Activities	Description
Activity 3.2.3: Promote healthy diets in the Cook Islands	Mother/child healthy diet food security tutors deliver trainings to ≥125 recipients (representing ≈½ of one year’s worth of births)
Activity 3.3.1: Sharing CC&H resilience knowledge products and experiences from this programme	Communications strategy gender sensitised approved, published and disseminated
Activity 3.3.2: Participate in regional events to share lessons learned	Share lessons learned with regional and international partners

Table 5 Project Activities and Description

R. GENDER MAINSTREAMING

81. ATOM project design recognizes the need to mainstream gender into management plans because currently TMO policies do not explicitly address gender. Annex 4 Gender Assessment and Gender Action Plan addresses gender sensitizing activities to ensure GCF Gender Policy requirements are met.

S. GRIEVANCE REDRESS MECHANISM

82. The Ministry of Finance and Economic management is committed to observing the highest ethical legal and moral standard in any project the Ministry implements, coordinates or funds. The Public, beneficiaries and stakeholders can confidentially report fraud, corruption or any standards outlined in the MFEM environmental and social safeguard framework. Under a GCF readiness programme, MFEM has undertaken workshops and developed a platform to ensure the public, beneficiaries and stakeholders are aware of MFEMs GRM policy and procedures and their rights to bring forward any grievances related to projects that MFEM implements or coordinates.

83. There are three channels of grievance mechanism that will apply to this project.

- ATOM – Project level Grievance Mechanism
- MFEM – Institutional Level Grievance Redress Mechanism
- GCF – Independent Redress Mechanism
- Any Parties wishing to raise grievances caused by or associated with the ATOM project will be able to do so.

84. During the inception phase of the project the AE alongside the executing agencies will develop and adopt a **project level grievance mechanism**. The purpose of this GRM will be to record and address any complaints that arise during the implementation phase of the project. It will address concerns and complaints promptly and transparently with no impacts (costs, discrimination). The GRM will operate within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level.

85. Key objectives of a project level GRM:

- Record, categorize and prioritize the grievances:
- Utilize and coordinate with traditional mechanisms / cultural practices
- Provide a survivor centered approach for SEAH matters (such grievance, issues, concerns will have additional measures aligned with national standards designed for Gender Based Violence (GBV), Violence against Children (VAC) and SEAH.
- Settle grievances via consultation with affected peoples, stakeholders and inform them of solutions
- Forward or escalate any unresolved cases through the MFEM GRM, GCF IRM or relevant authority (solutions / way forward must be offered to affected people and stakeholders)

86. All information relating to the Project Level GRM, MFEM GRM and the GCF Independent Redress Mechanism (IRM) will be communicated during the Inception Workshop of the ATOM project, specific trainings will also be conducted by the Accredited Entity and the executing entities relating to the Project Level GRM, communicating the responsibilities of the MFEM and the EE and the rights of workers, beneficiaries and Stakeholders.

87. Process for ATOM Project level GRM

- Concerns, complaints and grievances by affected persons will be directed to the Project Management Unit (PMU) at the TMO Office where the Project Manager and Social Safeguard Specialist will be the focal point to receive, record, review, and address concerns in coordination with relevant stakeholders (e.g. Cook Islands National Council of Women (CINCW) depending on the nature of the complaint.
- A complaints register will be maintained to record the date, details, and nature of each complaint, the name of the complainant, and the date and actions taken as a result of the follow-up investigation. The register will also cross-reference any non-compliance report and/or corrective action report or other relevant documentation relating to the complaint.

88. At the inception workshop, information summarising the GRM process and governance including contact details of the PMU and grievance form will be provided. Table 6 presents the steps and corresponding time frame for the grievance redress mechanism.

Table 6: Grievance Redress Process

89. Stage	90. Process	91. Duration (max)
92. 1	93. Any affected person or other concerned party takes grievance to TMO PMU or CIIC PCU	94. Any time
95. 2	96. Project Manager/Project Coordinator and National Monitoring Officer reviews and finds solution to the problem in consultation with CINCW and depending on the grievance will include International Social Safeguard Specialist advice.	97. 3 days

3	Depending on the type of grievance the TMO PMU Manager/CIIC PCU PC will confirm whether the affected persons should be on leave during the enquiry.	
4	Project Manager/Project Coordinator and National Monitoring Officer with the Social Safeguards Specialist reports back the outcome to affected person who submitted the grievance and the Accredited Entity.	5 days
If unresolved or not satisfied with the outcome at PMU level or has received no report in the allotted time period		
5	Affected person takes grievance through to the Ministry of Finance and Economic Management Grievance Redress Mechanism	Within 2 weeks of receipt of decision in step 4
6	Receipt of Complaint from DCD GRM team	5 working days
7	Establishment of the GRM Panel	
8	Analysis, Categorisation, documentation of evidence, Compliance review	10 working days
9	Complaint processing, including interview with complainant	15 working days
10	Complaint processing, including interview with PMU	15 working days
11	Registration and Decision Making and report back to complainant	
12	Publication of the decision on the MFEM Website	5 days of receipt of decision
If unresolved or at any stage if concerned party is not satisfied		
Affected party can take the matter to the Independent Redress Mechanism		As per the IRM policies and procedures

89. The process above recognises that there may be changes on who might be involved in hearing the grievance and representation of ethnicities and indigenous people focal point may be required.

90. Grievances, issues and concerns related to SEAH will be managed through this GRM process but will be implemented with the additional survivor centred measures that will include:

- The rights, needs and wishes of the survivor or victim is paramount
- Safety of the survivor will always be ensured with potential risks to the survivor identified and action taken to ensure the survivors safety and prevent further harm
- All actions should reflect the choices of the survivor
- All information will be confidential, and identities will be protected
- All actions should reflect the choices of the survivor and the survivor must provide informed consent to progress with each stage of the complaints process.

91. The ATOM Project Level GRM does not prevent any affected person from accessing the MFEM institutional level GRM or the GCF Independent Redress Mechanism or seeking redress through the Courts.

T. WHISTLEBLOWING PROCEDURE

92. In accordance with its External Communications Policy, Environmental and Social Safeguard Framework, antifraud and anticorruption policy, MFEM has set up a whistleblowing procedure which directly involves the Cook Islands Audit Office (CIAO), and the Public Expenditure Review Committee (PERC). Hence, any individual who becomes aware of any reprehensible practice related to fraud, corruption, wrongdoing, collusion or any similar act, shall report with all confidentiality to the CIAO, who shall examine the complaint and refer to the PERC for directions on investigation.
93. This whistleblowing procedure is also aligned to the Cook Islands Government Whistleblowing Policy, Cook Islands Government Financial Policies and Procedures Manual, Cook Islands Government Procurement Policy, and Public Expenditure and Review Committee and Audit Act 1995-1996.

U. STAKEHOLDER CONSULTATION REPORT

94. The Stakeholder engagement procedure carried out during the project design is presented in Annex 25 ATOM Stakeholder Consultation Report. Stakeholder consultations was an important element in the design and preparation of this project and if it is to be successful and effective it must continue to be woven together with not only technical expertise, government and non-government knowledge but also ongoing community consultation and “buy in”.
95. A team of technical experts were employed to complete the funding proposal (FP) “**Akamatutu’anga to Tatou Ora’anga Meitaki (ATOM)** “Building resilient and healthy Cook Islands community” to GCF. The FP aims to support TMO and the Government of the Cook Islands to enhance the capacity of the health system of the Cook Islands and to protect and improve population health in an unstable and changing climate.
96. The stakeholder consultations employed the participatory method which was designed to collect information, ideas, opinions and insights from a wide range of stakeholders to compliment and inform the proposal. Stakeholder consultations involved asking for input, clarification around priorities, listening when it is given and responding transparently. The engagement aimed to build trust and support and was intended to provide new knowledge, clarifying issues, finding solutions, resolving conflicts and providing ways forward.
97. Stakeholder consultations commenced from 15 August 2022 to 31 January 2023. The discussions with stakeholders to develop the final design of the proposal included informing the affected communities (i) the purpose, nature, and scale of the project; (ii) the proposed timeframe for the proposed project activities; (iii) any risks to and potential impacts that might occur as a result of the project and noted the relevant mitigation measures to overcome potential risks; (iv) the ongoing stakeholder engagement process during implementation of the project.
98. It is important to note GCF had approved the concept note and consultations were guided by the need to complete the funding proposal. The stakeholder conversations were steered towards their understanding on the impacts of climate change and extreme weather events and how these events might impact health delivery and services, water capacity, communication and electricity systems

and services using the questions to draw information. Summary Pa Enea consultation comments and concerns are included in Table 8 below.

Climate change effects	Health Impacts	Health system capacity and resilience
Water scarcity, quality and quantity	Water borne diseases and other water illness (gastroenteritis-stomach flu)	Infrastructure deficits- water testing, storage and maintenance
Disruption of food systems, security and safety	Food borne diseases, diabetes, livelihoods	Delivery of service, lack of capacity and capabilities (Workforce)
Frequent and stronger extreme natural events and changes in climate (dry, flooding, lack of rainfall)	Physical injury, Mental and social health and climate change anxiety, respiratory illness (asthma)	Infrastructure deficits- emergency shelters, medical centers, access to health care
Extreme heat	Heat stress, heat related illness (lack of physical activity), respiratory illness	Power supply disruption (power cut), Pa Enea hospitals with no backup generator, vaccines in fridge become inadequate
Coastal erosion, Sea level Rise (intrusion on food systems), sea spray (on structures)	Food borne diseases, livelihoods,	Infrastructure deficits- emergency shelters, medical centers (rust), delivery of service

Table 7 Summary Pa Enea Consultation Comments

The Proposal will address these Infrastructure deficits with improved facilities and equipment in the health centres as well as more training for the workforce to deliver better health services.

99. Shortage of productive capacity and capabilities

All hospitals in the Pa Enea are managed by registered nurses that manages the hospital, human resources and deliver of primary care. Pa Enea hospital personnel range from 4 to 8 people. Some services are not provided similar to dental care, maternal birth because they do not have the personnel or qualifications. Many Pa Enea employees sympathized and requested that all islands should have a qualified doctor, midwife and nurse as the current system discourages confidence in the current health system. This would also reduce transportation cost specifically referrals from the Pa Enea.

The Proposal: appropriate training and capacity building programmes for TMO Staff throughout the project

100. Improved governance includes the possibility that the Pa Enea might receive more attention from the government in Rarotonga.

- No backup generators in hospitals, poor telecommunications quality, limited technology access, exposed and deteriorating solar panels, leaking and damaged water tanks, minimal vaccine fridge storage, “not built for purpose” emergency and health centers are just a few manifestations of an infrastructure deficit that is undermining the well-being of the people in the Pa Enea, economic stability and is lowering the quality of life. Many years of underinvesting or lack of understanding in basic infrastructure in the Pa Enea has produced little progress in effective health delivery and services.

The Proposal: Governance structures will be reviewed and improved to reflect improvements in communications, information and technology and data systems.

101. Lack of Coordination between Rarotonga and Pa Enea TMO health systems

- TMO Pa Enea workers explicitly shared that there is a lack of coordination between the Rarotonga Hospital Administration and Pa Enea hospital. Pa Enea hospitals would request for equipment or assistance for the hospital like generators and their requests would be dependent on funding and competing with other Pa Enea islands. Respondents pointed out that health centers do not have generators even after number of requests. A respondent said that most times they are not sure if they are included or even considered.

The Proposal: Improvements in Strategic Planning and information systems.

102. Water problems (scarcity, storage, quality and quantity)

- Water matters is an ongoing issue in the whole of the Pa Enea. Due to several climate change induced problems including drought, lack of rainfall, saltwater intrusion, lack of water storage, and the poor quality of water, people in the Pa Enea livelihoods are severely affected. Water problems affect food crops/plantations therefore the pa Enea islands have little access to fresh vegetables and crops for healthier food options. The poor water quality for household drinking and cooking in the Pa Enea leads to some of the populace contracting stomach bugs.

The Proposal: water storage systems are climate resilient

103. Funding and resources

- The Pa enua emphasized the lack of personnel and operational funding and resources available to deliver effective health services and programs for the community. As mentioned above, all pa Enea hospitals/health centers provide the primary services, and all other cases are referred to Rarotonga hospital which is a huge cost to TMO.

The Proposal: Better training will bring better services with improvements in technology

104. *Emergency centres are community halls*

Most of the Pa enua emergency centers are community halls. On all islands community halls are designed to host guests and returning Cook Islanders for housing or for events. These halls are not built to withstand extreme natural disasters like cyclones. Islands like Mitiaro use their hospital as the emergency center, this is definitely not practical or safe for the community. The engagement process for this proposal involved working collaboratively and on a regular basis with TMO who are the main key recipients and executing agency for the project proposal. Engagement included regular updates to the Secretary of Health, meetings with TMO divisional managers and staff and proposal progress update to the Minister of Health in February. The engagement process also involved consultations with co-operating government and non-government organisations on Rarotonga. Government agencies included EMCI, OPM, TMO, MOA, CIIC and non-government organisations which included CIRC. In all cases the discussions were steered around support and implementation of the proposal. The Pa Enua discussions included island council members, communities and NGO groups considering what should be improved in terms of health delivery services especially with the unstable climate. Additional to formal discussions and consultations there were regular technical team monthly meetings with DCD. These meetings served as funding proposal updates, and any issues as well as identifying and sharing activities that stakeholders could actively shape and influence. Further information disclosure and summary of comments and concerns received from affected people and other stakeholders is included in Annex 25 Stakeholder Consultation Report

V. STAKEHOLDER ENGAGEMENT DURING PROJECT IMPLEMENTATION

105. It is anticipated that regular stakeholder consultations will continue during project implementation and will be included in the Annual Workplan by the Project Manager/Coordinator. The Engagement Plan will:

- Coincide with activities in the Pa Enua providing time for those on islands to prepare
- inform stakeholders of the project's progress,
- support capacity building and awareness raising,
- validate findings and
- present results

106. TMO and CIIC will provide regular updates, including on their website and through the use social media including print, radio, reports and presentations. Information will be presented in Cook Islands Māori and English.

107. Full contact details for Project Manager and Gender Specialist will be communicated to project beneficiaries and stakeholders where stakeholders will be able to discuss inquiries related to the project, raise concerns or file a complaint.

108. At the national level, stakeholders could be invited to participate and/or observe in PSC meetings, quarterly, to discuss pertinent topics. Participation will be invitation-based

109. Stakeholders will also be engaged through the PMU which will operate at the national level.
110. During the construction and implementation activities in the Pa Enea meetings will be held at the start of construction and will continue during implementation.
111. Annual project reporting to the GCF must provide an outline of consultations and workshops conducted and provide insight into upcoming events for the following year.
112. Participation within the ATOM project is voluntary, and Free Prior and Informed Consent (FPIC) will be a core underlying principle. The process of full participation and full information provided in a timely manner with all community groups will be essential and will commence soon after project approval.
113. Part of the consultation process includes monitoring stakeholder feedback for reporting and evaluation by the PMU.

Appendix 1 GCF1 Environmental and Social Screening Checklist⁶

Part A: Risk Factors.

Please indicate your answers to the questions below and provide an explanation on the response selected. In cases when the TBD response has been selected, please explain briefly why you are not able to determine now and when in the project cycle the question will be addressed.

If the criteria are not applicable to the project you may write N/A in the justification box.

Risk Factors	YES	NO
Will the activities involve associated facilities and require further due diligence of such associated facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>Please provide a justification of your answer:</i> No associated facilities will be required during the project; all activities under components 2 and 3 will take place in-situ within the footprint of existing facilities. Relatedly, all proposed renovations will be carried out within the footprint of existing Health Centre Facilities. N.B. because CIIC – a statutory entity of the Cook Islands Government - is the designated Implementing Entity or proposed building renovation activities, all such activities will necessarily be compliant with requirements of the Cook Islands Building Code; proposed activities are conceptualized to not require Resource Consent or Environmental Permits/Consents (which are stipulated for activities with ‘significant environmental impact’); as such, restricting programmatic activities to those categories that do not incur such consenting requirements aligns with GCF’s ‘minimal environmental and social risks and impacts’ designation.</p>		
Will the activities involve trans-boundary impacts including those that would require further due diligence and notification to affected states?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>Please provide a justification of your answer:</i> Cook Islands is an island nation and has no terrestrial boundaries</p>		
Will the activities adversely affect working conditions and health and safety of workers or potentially employ vulnerable categories of workers including women and children?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>Please provide a justification of your answer:</i> There are no expected adverse impacts on workers; the employment of children is proscribed under the Employment Relations Act 2012 and Cook Islands’ ratifications of ILO Conventions. Executing entities, implementing partners and contracts will be required to comply with the Cook Islands National Occupation Health and safety standards and procedures; please see the ESAP.</p> <p><i>The role of the Ministry of Internal Affairs is that of the primary government agency with responsibility for Occupational Safety and Health (OSH) Standards, which are governed by The Draft 2019 Cook Islands OSH Policy; (formal enactment of relevant policy and legislation was interrupted by COVID, but are addressed via Cook Islands’ ratifications of ILO C029, C105, and C182 et al.</i></p> <p><i>Public Service Commission OSH Policy has been in effect since January 2016 and requires all government agencies to establish and maintain a safe and healthy work environment for employees, contractors and visitors and this will be enforced during the implementation of this project. CIIC Draft OSH policy is currently under review but is broadly provided for via the aforementioned ratified and In Force ILO conventions.</i></p>		
Will the activities potentially generate hazardous waste and pollutants including pesticides and contaminate lands that would require further studies on management, minimization and control and compliance to the country and applicable international environmental quality standards?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>Please provide a justification of your answer:</i> The project will not generate hazardous waste or pollutants. In relevant cases, e.g. PV panels and battery storage, suppliers will be required to dispose of equipment after its use in an environmentally friendly way. Such conditions will be</p>		

⁶ In answering this checklist, you may refer to Annex 1: Guidance on Part A ESS Screening of the “[Guidelines for the environmental and social screening of activities proposed under the SAP](#)”

included in the successful supplier's contract. With respect to mobile laboratory facilities and the storage/disposal/remediation of wastes generated from such activities, it should be noted that provisions for the disposal of all medical wastes, specimens, reagents, solvents, biohazard substances etc. are already covered under TMO protocols, and therefore mobile laboratory wastes will simply be processed via health facilities' existing biohazard/chemical waste streams.

Pa Enea Action for Resilient Livelihoods (PEARL) Project Adaptation Fund provided funding to the Pa Enea islands to establish community and school hydroponic units. Training was carried out on at least three occasions during implementation on the islands and production flourished. During the stakeholder consultations in the Pa Enea two islands in the Northern Group Rakahanga and Penrhyn requested if extra hydroponic units could be provided. These are small, framed shade houses with reticulated pump water system that includes nutrients to feed the plants. There is little or no wastage and if there is any water discharge it goes directly on flower gardens or other plants – it is generally recycled and there is no risk to the environment. The growth of hydroponic vegetables provides greens for households when there are few green vegetables available.

Additionally, the National Environment Service (NES) waste management function is primarily to prevent, control and correct the pollution of air, water, and land. NES is also responsible to ensure environmentally safe disposal of toxic chemicals and wastes. Key sections of the Environment Act (EA) 2003 relate to the management and disposal of waste. Most of the activities will be undertaken in the Pa Enea and Section 11 of the Act establishes Island Environment Authority (IEA) on each island and it is this body that will enforce the EA. Including Part 7 that relates to control of waste including appointment of Environment Officers to issue notices requiring occupiers of private land to clear litter and to ensure that Cook Islands waters and inland waters are not being polluted by toxic or chemical waste that may harm the environment. Hence, both operational and regulatory bodies already exist to address any wastes generated via the mobile laboratory activities proposed. Furthermore, the concept stage was developed using the Tarai Vaka Process (Cook Islands Activity Management System), which has confirmed that there will be no hazardous waste generated; any wastes from mobile laboratories that cannot be disposed of on the Pa Enea will be transhipped to Rarotonga to be disposed of, per existing TMO protocol. The management system includes an Environmental and Social Safeguards Framework (ESSF), wherein all environmental and social risks and impacts of a project must be identified as part of the environmental and social assessment conducted in accordance with ESSF. This project was assessed as Category C Minimal or no adverse impacts and no further action is required.

Will the activities involve the construction, maintenance, and rehabilitation of critical infrastructure (like dams, water impoundments, coastal and riverbank infrastructure) that would require further technical assessment and safety studies?

Please provide a justification of your answer:

As with the issue of associated facilities, all activities under components 2 and 3 will take place in-situ within the footprint of existing facilities. Relatedly, all proposed renovations will be carried out within the footprint of existing Health Centre Facilities. No construction, maintenance, or rehabilitation of critical infrastructure such as dams, water impoundments, coastal and riverbank infrastructure is proposed under this project.

Will the proposed activities potentially involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities?

Please provide a justification of your answer:

None of these apply to the project locations / all physical or economic works will be undertaken in government owned land and buildings.

All activities will be carried out on Government owned land. No further land acquisition is expected and therefore there will be no involuntary resettlement required.

Will the activities be located in or in the vicinity of protected areas and areas of ecological significance including critical habitats, key biodiversity areas and internationally recognized conservation sites?

Please provide a justification of your answer:

All activities will be located within the current footprint of existing buildings and will not impinge or have any impact on protected areas and or critical habitats

Will the activities affect indigenous peoples that would require further due diligence, free, prior and informed consent (FPIC) and documentation of development plans?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Please provide a justification of your answer: Under the UN working definition of indigenous peoples, no differentiable indigenous sub-groups exist in the Cook Islands. However, traditional people and communities within the Cook Islands have been engaged, consulted and contributed to the development of this project. This is detailed in the Stakeholder consultation report that includes names and titles of all stakeholders consulted</i>		
Will the activities be located in areas that are considered to have archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values or contains features considered as critical cultural heritage?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Please provide a justification of your answer: N/A As noted earlier, the project will be on existing sites and the project will have no impact on any cultural or religious sites.</i>		

Part B: Specific environmental and social risks and impacts

Assessment and Management of Environmental and Social Risks and Impacts	YES	NO	TBD
Has the E&S risk category of the project been provided in the concept note? <i>Tarai Vaka Activity Process - Cook Islands Management System has shown the project to be 'Category C' with minimal or no adverse impacts.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Has the rationale for the categorization of the project been provided in the relevant sections of the concept note? <i>The rationale for the project has been provided in all areas required in the project. Relevant Cook Islands legislation, policies, and agency protocols have been referenced/linked where appropriate. International conventions to which Cook Islands is a signatory have also been referenced/linked.</i>			
Are there any additional environmental, health and safety requirements under the national laws and regulations and relevant international treaties and agreements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer: The project has low level of in-situ upgrades proposed, all of which is to take place on existing sites; the project's primary emphasis is on institutional capacity-building and prevention of health impacts. All programmatic activities will conform to existing provisions for environmental, health, and safety protections under the Public Health Act, the Environment Act, draft National Occupational Safety and Health Policy, and other relevant legislation, policies and procedures. All additional Environmental laws and safety requirements have been included in Part A above.</i>			
Are the identification of risks and impacts based on recent or up-to-date information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer: This proposal contains information from an initial risk and impact assessment which is based on the latest available information. The extensive consultation processes engaged in as part of the pre-feasibility study established communication channels and feedback mechanisms to ensure that risk and impact identifications are current.</i>			
Labour and Working Conditions	YES	NO	TBD
Will the activities potentially have impacts on the working conditions, particularly the terms of employment, worker's organization, non-discrimination, equal opportunity, child labour, and forced labour of direct, contracted and third-party workers?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer: The AE (as a government agency) is required to ensure that this project is in compliance with the Cook Islands Employment Relations Act, Cook Islands Government Procurement Policy, Office of the Public Service Commissioner</i>			

<p><i>Employment policies and procedures and the Cook Islands occupational health and safety policy. The project has low in-situ upgrades, otherwise the emphasis is on institutional capacity building and prevention of health impacts. However, we have inserted measures and actions under labour and working conditions in the ESAP</i></p> <p><i>Labour and Working Conditions are governed by the Cook Islands Employment Relations Act 2012 which are monitored by the Ministry of Internal Affairs as well as the Public Service Act 2009, Public Health Act 2004. The AE and EEs will be responsible for ensuring compliance with all these Acts.</i></p>			
Will the activities pose occupational health and safety risks to workers including supply chain workers?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>Please provide a justification of your answer:</i></p> <p><i>The project has low level in-situ upgrades proposed, all of which is to take place in-situ; the project's primary emphasis is on institutional capacity-building and prevention of health impacts. The accredited entity will ensure that agencies/ executing entities are briefed and undertake training on occupational health and safety standards. Please see the ESAP for measures and actions.</i></p> <p><i>The project is not expected to pose occupational health and safety risks to works – all laws relating to labour and working conditions in the Cook Islands will be monitored and enforced by the AE and EEs. The AE will ensure that any supply chain inputs for photovoltaic equipment and batteries come from countries who have ratified the ILO Forced Labour Convention 1930 (No. 29) and the Abolition of Forced Labour Convention, 1957 (No. 105).</i></p>			
Resource Efficiency and Pollution Prevention	YES	NO	TBD
Will the activities generate (1) emissions to air; (2) discharges to water; (3) activity-related greenhouse gas (GHG) emissions, (4) noise and vibration; and (5) wastes?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>Please provide a justification of your answer:</i></p> <p><i>The project has a low level of construction proposed, all of which is to take place in-situ; the project's primary emphasis is on institutional capacity building and prevention of health impacts. Suppliers of equipment will be contractually required to dispose of equipment after its useful life. Such conditions will be included in the project cooperation agreements and contracts.</i></p> <p><i>This is an adaptation project and will have low level, if any GHG emissions, discharges to water, noise and vibration and wastes – this project will improve the health facilities on the islands and therefore improve health services provided to the population on the island.</i></p>			
Will the activities utilize significant amount of natural resources including water and energy?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>Please provide a justification of your answer:</i></p> <p><i>The project has a low level of upgrades proposed, all of which is to take place in-situ; no programmatic activities are expected to require significant amounts of water or energy</i></p> <p><i>Given all Pa Enua islands are ≥95% powered by renewable energy, primary energy requirements for all proposed programmatic activities are considered insignificant. Similarly, water resource usage for proposed activities are low.</i></p>			
Will there be a need to develop detailed measures to reduce pollution and promote sustainable use of resources?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>Please provide a justification of your answer:</i></p> <p><i>All activities will promote the sustainable use of resources; no air or water pollution is expected as a consequence of project implementation. Indeed, the proposed adaptation measures are <u>reasonably expected to result in pollution reduction co-benefits</u>. As such, the development of detailed pollution reduction and/or sustainable resource use promotion is considered to be superfluous given the project's inherent focus on such activities (i.e. project activities endeavour to achieve pollution reduction and sustainable resource use promotion, and therefore do not need to separately mitigate counterfactuals).</i></p>			
Community Health, Safety, and Security	YES	NO	TBD
Will the activities potentially generate risks and impacts to the health and safety of the affected communities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>Please provide a justification of your answer:</i></p> <p><i>Quite the inverse, the project's objective is to reduce health and safety risks for surrounding communities. As with the aforementioned pollution reduction co-benefits, climate adaptation and mitigation efforts are correlated with improvements</i></p>			

<i>in health and safety gains for affected communities. A significant focus of the consultation process during the pre-feasibility study phase was mitigating risks and maximizing benefits.</i>			
Will there be a need for an emergency preparedness and response plan that also outlines how the affected communities will be assisted in times of emergency?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>Please provide a justification of your answer:</i> <i>The Climate Change and Health Adaptation Plan (CC&HAP) has provisions for emergency response. Each island also has Island Emergency Plans developed in collaboration with the Emergency Management Cook Islands Office. The project activities as such do not require further response planning, while there is an activity focused on disaster preparedness for local communities. However, we inserted measures and actions into the ESAP to ensure that all those involved with the implementation of the project are aware and trained on the relevant islands' emergency action plans.</i></p> <p><i>The Red Cross Cook Islands is an implementing partner for Component 3 of this project and will continue to provide emergency provisions and support in the event of an emergency and will continue to work with the community to support their understanding of emergency response requirements – when how and what to do in time of emergencies.</i></p> <p><i>All project activities are low risk and emergency preparedness and response plan in the affected communities is expected to be also low risk. However, activities in the ESAP indicate areas where there are risks and mitigation measures have been identified.</i></p> <p><i>Industry best practices and standard operating procedures of the executing entity will be applied to all project activities, these include first aid training, occupational health and safety standards and training</i></p>			
Will there be risks posed by the security arrangements and potential conflicts at the project site to the workers and affected community?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>Please provide a justification of your answer:</i> <i>Not relevant to this project.</i></p>			
Land Acquisition and Involuntary Resettlement	YES	NO	TBD
Will the activities likely involve land acquisition and/or physical or economic displacement?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>Please provide a justification of your answer:</i> <i>None foreseen</i></p> <p><i>As stated earlier the project inputs are within the footprint of the current buildings and therefore there is no requirement to acquire further land; therefore, there will be no physical or economic displacement.</i></p>			
Biodiversity Conservation and Sustainable Management of Living Natural Resources	YES	NO	TBD
Will the activities potentially introduce invasive alien species of flora and fauna affecting the biodiversity of the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>Please provide a justification of your answer:</i> <i>The project does not involve any flora or fauna and will not have biodiversity impacts. This is part of the exclusion's list in the ESAP.</i></p>			
Will the activities have potential impacts on or be dependent on ecosystem services including production of living natural resources (e.g. agriculture, livestock, fisheries, forestry)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>Please provide a justification of your answer:</i> <i>This is a health sector project with no foreseen adverse impacts on ecosystem services. In fact, the project will enhance the agricultural sector by promoting healthy lifestyles as well as ensuring new mothers will have access to free agricultural plants to assist them to develop home gardens – a way to introduce and develop healthy eating habits in families and the communities.</i></p>			
Indigenous Peoples	YES	NO	TBD

Will the activities potentially have any indirect impacts on indigenous peoples, ethnic minorities, or vulnerable and marginalized groups?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer: The project will emphasize support to vulnerable groups lacking health services and disaster preparedness. The project is intended to enhance health services for the entire population on each of the islands.</i>			
Cultural Heritage	Yes	NO	TBD
Will the activities restrict access to the cultural heritage sites and properties?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer: The project will not restrict access to any heritage sites or properties</i>			
Will there be a need to prepare a chance-find procedure in case of the discovery of cultural heritage assets?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer: This is not going to be the case as the activities will not be sited on undisturbed locations where undiscovered cultural heritage assets might be located.</i>			
Stakeholder engagement and grievance	Yes	NO	TBD
Will the activities include a continuing stakeholder engagement process and a grievance redress mechanism and integrated into the management/implementation plans?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer: A stakeholder's engagement plan will be developed at the inception phase of the project and will be implemented during the project.</i> <i>The Accredited entity as part of its policies also requires all projects to ensure compliance with its external communications procedures and establish a project level GRM, which are part of the project management activities. Grievance Redress Mechanism has been included in Section 8 of this Report.</i>			

Part C: Sign Off

Sign-off:



Tessa Vaetoru – MFEM ESS Officer.

Appendix 2 **GCF SEAH Screening Checklist**⁷

The GCF SEAH Risk Screening Checklist below will be used for ATOM at the commencement of ATOM project and if required make changes in light of WHO SEAH Regional Strategy currently under discussion and in development.

SEAH Risk Screening Checklist

Ensuring basic risk mitigation measures are in place ahead of stakeholder engagement	Responsibility	Comments
Does the AE have a SEAH Policy (or SEAH provisions in another policy)?	AE	Code of Conduct Policy GOVERNMENT OF THE COOK ISLANDS Under this government policy, Sexual Harassment is a serious misconduct. The Cook Islands Integrated National Strategic Plan for Sexual and Reproductive Health 2014 – 2018 Harassment Act 2017
If the AE has contracted out stakeholder consultations, does that entity have a SEAH Policy (or are they contractually bound to apply the AE's)?	AE/Consultant	No AE has not contracted out stakeholder consultations – current policies apply
Does the AE have an employee Code of Conduct?	AE	Yes as above
If the AE has contracted out stakeholder consultations, does that entity have an employee Code of Conduct (or are they contractually bound to apply the AE's)?	AE/Consultant	As above
Have AE employees and consultants conducting stakeholder consultations been trained on preventing SEAH and the Code of Conduct?	AE/Consultant	AE employees are and will be undergoing specific training in this area
Does the AE have a grievance mechanism in place in case of early SEAH complaints from stakeholder engagement?	AE	Yes
Does the AE have a specialist on staff who can undertake the more advanced assessment in Stage 4 as well as deal with early SEAH complaints if they arise; and if not, does the AE require budget and /or assistance with this?	AE	During project implementation there will be a specialist able to undertake the more advanced assessment
Contextual Level (and Baseline Conditions)	Reference	Comments

⁷ In answering this checklist, you may refer to Annex 1: Guidance on Part A ESS Screening of the “[Guidelines for the environmental and social screening of activities proposed under the SAP](#)”

Does the country have laws prohibiting sexual harassment / stalking generally?	National /State law (Gender Assessment)	Yes, as above
Do labor laws prohibit sexual harassment in the workplace?	National/State law (Gender Assessment)	Yes, as above
Does the country have laws prohibiting intimate partner violence (IPV)?	National/State law (Gender Assessment)	Yes
What is the prevalence of GBV in the country?	National statistics (Gender Assessment)	There are limited records kept by Gender Assessment shows areas of concern
What is the legal age a person can marry?	National law	18 years

Despite any laws, what is the prevalence of child marriage in the country?	National statistics	N/A
What is the income level of the country?	World Bank ranking (H, HM, M, LM, L)	
Where does the country rank on global gender indices?	World Bank Reports / Other	
Is there a national action plan on GBV and/or sexual harassment?	National government	Currently in development with WHO
Does the country have specialized services for survivors of GBV (at both the national and local level) including women's shelters, adequate medical facilities and facilities which provide psycho-social support?	Local gov / NGOs	No
Is the country currently experiencing war, internal conflict or humanitarian disaster?	National / Media	No

Project Level Risks	Responsibility	Comments
Are women concentrated in lower paid roles and mostly line-managed and supervised by men?	AE	No, the majority of TMO employees are women
Are piece-rate systems or other performance related pay structures used where individuals are in control of how much other workers get paid?	AE	Women have equal access to performance related pay structure
Will project workers have control over lifechanging resources such as the allocation of compensation for displacement or access to basic or highly sought-after resources?	AE	If there were allocation of resources as a result of displacement women will have equal access
Will security personnel be used? Will they be armed?	AE	No – small team will be used with TMO staff
Will there be an influx of male workers into the project area (as opposed to only using local labor)?	AE	No – there will be an equal balance of men and women

Are local communities poor and lacking basic resources?	AE	The communities all have adequate resources
Will migrant workers be employed by the project, especially those who may not speak the local language? Will they be employed on a temporary or daily basis?	AE	No.
Will project workers all have formal contracts?		Yes
Will goods frequently be transported over long distances, especially through poor and/or remote communities?	AE	No but the distance is across the ocean
Are worksites or project activities based in remote locations? Will worksites be spread out, with isolated spaces?	AE	Yes, on small islands and small communities
Will project workers live in the community or in worker housing? If in worker housing, is it mixed sex?	AE	They will have rental accommodation
Will workers be required to travel long and potentially unsafe distances, and at times of day when transport options may be limited?	AE	No, they will travel to the site and remain until the building is completed
Will the project operate in highly pressurised work environments, with tight seasonal deadlines?	AE	No, it will be community level environments
Is the project located within a male-dominated sector where female workers will be employed?	AE	No – the current CIIC project manager is a woman and TMO staff on the remote islands are mostly women
Have communities, especially low income/ vulnerable communities, voluntarily raised concerns in relation to SEAH/GBV during consultations?	AE	No formal complaints or concerns have been raised with regard to SEAH/GBV
Have any changes been made to project design or adaptive management undertaken due to concerns of stakeholders and communities? (If yes, work through this checklist again)	AE	No because there were no issues raised and the likelihood of incidences were very low.

Appendix 3 MFEM Environmental and Social Safeguards

Environmental and social safeguards

[Insert project title]

ESS Screening

The objectives of the environmental and social screening are to;

1. Evaluate the environmental and social risks associated with a proposed activity
2. Establish the likely environmental and social risk category of the proposed activities
3. Identify opportunities to improve the environmental and social outcomes of the activities
4. Determine the extent and depth of environmental and social due diligent that will be undertaken and the appropriate environmental and social safeguard instruments and requirement that will be prepared, disclosed and submitted to Tarai Vaka Process (TVP)

Environmental and social Screening is to be undertaken at the Concept Note stage of the TVP. The screening may indicate the need to consider alternatives, e.g. different approaches, timing, scale and location. It will also ensure that environmental opportunities and risks can be fully integrated into the design process and adequately reflected in the Concept Note project logical framework.

Environmental screening must be completed for all proposed activities. The results of the screening should accompany the Concept Note. If you require assistance or have any questions regarding ESS, please contact tessa.vaetoru@cookislands.gov.ck

The Environmental and social screening consists of two parts;

1. Part A – screening against a set of exclusion criteria. The exclusion criteria describe the activities that have specific risks factors that would raise the overall environmental and social risks of the proposed activities (Cat A or Cat B) or would require a more detailed and specific assessments and management plans.
2. Part B is a screening checklist organized according to the MFEM Environmental and Social Safeguard Standards^[1]. The Screening takes into consideration potential

environmental and social risks including requirements based on the specific ESS standards. It also identifies any other potential environmental and social issues that will still have to be considered and managed. The result of the Part B screening will be the basis of the Environmental and Social Commitment Plan^[2] and/or Environmental and Social Management Plan or Framework^[3].

ESS screening was conducted in consultation with the [name of executing/implementing agencies] and leveraging information from interviews with key stakeholders [name stakeholders].

Table 1. the ESS screening of indicative project activities

Part A Risk Factors			
<i>[Guidance] for each of the screening questions you must “check” YES^[4], NO or TBD^[5]. Whichever box is “check” you must provide justification for your answer</i>	YES	NO	TBD
Would the project involve the construction, maintenance, and rehabilitation of critical infrastructure (like dams, water impoundments, coastal and riverbank infrastructure) that would require further technical assessment and safety studies?			
<i>Please provide a justification of your answer</i>			
Have local communities or individuals raised human rights concerns regarding the project (e.g. during the stakeholder engagement process, grievance processes, public statements)?			
<i>Please provide a justification of your answer</i>			
Would the programme / project/ activities result in significant greenhouse gas emissions or reduce the resilience of islands/communities to extreme weather events and/or climate change?			
<i>Please provide a justification of your answer</i>			
Would the Programme /project/activities involve or lead to adverse impacts on enjoyment of the human rights (civil, political, economic, social or cultural) of the affected population and particularly of marginalized groups?			
<i>Please provide a justification of your answer</i>			
Would the Programme /project/activities involve or lead to inequitable or discriminatory impacts on affected populations, particularly people living in poverty or marginalized or excluded individuals or groups, including persons with disabilities?			
<i>Please provide a justification of your answer</i>			
Would the Programme /project/activities involve or lead to restrictions in availability, quality of and/or access to resources or basic services, to marginalized individuals or groups, including persons with disabilities?			
<i>Please provide a justification of your answer</i>			
Have women’s groups/leaders raised gender equality concerns regarding the project, (e.g. during the stakeholder engagement process, grievance processes, public statements)?			
<i>Please provide a justification of your answer</i>			

Would the Programme /project/activities involve or lead to exclusion of any potentially affected stakeholders, in particular marginalized groups and excluded individuals (including persons with disabilities), from fully participating in decisions that may affect them?			
<i>Please provide a justification of your answer</i>			
Would the Programme /project/activities involve or lead to grievances or objections from potentially affected stakeholders			
<i>Please provide a justification of your answer</i>			
Will the project result in risks of retaliation or reprisals against stakeholders who express concerns or grievances, or who seek to participate in or to obtain information on the project?			
<i>Please provide a justification of your answer</i>			
Will the activities involve trans-boundary impacts including those that would require further due diligence and notification to affected states?			
<i>Please provide a justification of your answer</i>			
Will the activities involve associated facilities and require further due diligence of such associated facilities?			
<i>Please provide a justification of your answer</i>			

Part B -Specific Environmental and Social Risks and Impacts			
Standard 1 – Assessment and Management of Environmental and social Risks and impacts	YES	NO	TBD
Are the identification of risks and impacts based on recent or up-to-date information?			
<i>Please provide a justification of your answer</i>			
Has the E&S risk category of the project been provided in the concept note?			
<i>Please provide a justification of your answer</i>			
Has the rationale for the categorization of the project been provided in the relevant sections of the concept note?			
<i>Please provide a justification of your answer</i>			
Are there any additional environmental, health and safety requirements under the national laws and regulations and relevant international treaties and agreements?			
<i>Please provide a justification of your answer</i>			
Standard 2 – Labour and Working Conditions			
Will the activities adversely affect working conditions and health and safety of workers or potentially employ vulnerable categories of workers including women and children?			
<i>Please provide a justification of your answer</i>			
Will the activities involve or lead to discriminatory working conditions and or lack of equal opportunity?			
<i>Please provide a justification of your answer</i>			

Standard 3 – Resource Efficiency and Pollution Prevention			
Will the activities generate emissions; discharge pollution into water and land; generate activity related greenhouse gas emissions; use hazardous materials; generate noise and vibration; and/or generate waste including hazardous waste?			
<i>Please provide a justification of your answer</i>			
Are the activities likely to utilize natural resources, including water and energy?			
<i>Please provide a justification of your answer</i>			
Will there be a need to develop and implement measures to reduce pollution and promote sustainable use of resources?			
<i>Please provide a justification of your answer</i>			
Standard 4 – Community Health, Safety and Security			
Will the proposed activities potentially generate risks and impacts to the health and safety of the affected communities?			
<i>Please provide a justification of your answer</i>			
Would the project prejudice or discriminate toward individuals or groups in providing access to development resources and project benefits, particularly in the case of those who may be disadvantaged or vulnerable?			
<i>Please provide a justification of your answer</i>			
Standard 5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement			
Would the project result in a negative change to existing legitimate tenure rights?			
<i>Please provide a justification of your answer</i>			
Would the project possibly result in economic displacement (e.g. loss of assets or access to resources due to land acquisition or access restrictions – even in the absence of physical relocation)?			
<i>Please provide a justification of your answer</i>			
Are the activities likely to alter existing land use and restrict access to natural resources resulting in loss of livelihoods and other economic activities?			
<i>Please provide a justification of your answer</i>			
Would the project potentially involve temporary or permanent and full or partial physical displacement?			
<i>Please provide a justification of your answer</i>			
Standard 6 – Biodiversity conservation and Sustainable Management of Living Natural Resources			
Will the activities be located in protected areas and areas of ecological significance including critical habitats, key biodiversity areas, and nationally/ locally/ internationally recognized conservation sites?			
<i>Please provide a justification of your answer</i>			

Would the project introduce non-native or non-locally adapted species, breeds, genotypes or other genetic material to an area or production system, or modify in any way the surrounding habitat or production system used by existing genetic resources?			
<i>Please provide a justification of your answer</i>			
Would the project potentially introduce invasive alien species of flora and fauna affecting the biodiversity of the area?			
<i>Please provide a justification of your answer</i>			
Will the activities be located in protected areas and areas of ecological significance including critical habitats, key biodiversity areas, and nationally / locally / internationally recognized conservation sites?			
<i>Please provide a justification of your answer</i>			
Is the project or programme likely to have potential impacts on biodiversity (especially critically endangered and/or endangered species, endemic or restricted-range species, and significant migratory or congregator species) and ecosystem services, including production of living natural resources?			
<i>Please provide a justification of your answer</i>			
Standard 7 – Indigenous People and Traditional Local Communities			
Will the activities provide equitable opportunities to indigenous peoples and other vulnerable groups during stakeholder consultation and in decision-making during the preparation, implementation, monitoring and evaluation of the activities?			
<i>Please provide a justification of your answer</i>			
Will the activities affect indigenous peoples that would require further due diligence, free, prior and informed consent (FPIC) and development of inclusion and development plans?			
<i>Please provide a justification of your answer</i>			
Standard 8 – Cultural heritage			
Will the activities be located in areas that are considered to have archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values or contains features considered as critical cultural heritage?			
<i>Please provide a justification of your answer</i>			
Will the activities restrict access to the cultural heritage sites and properties?			
<i>Please provide a justification of your answer</i>			
Will there be a need to prepare a chance-find procedure in case of the discovery of cultural heritage assets?			
<i>Please provide a justification of your answer</i>			
Standard 9 – Stakeholder Engagement and Information Disclosure			
Has the Programme, Project, Activities undertaken a stakeholder analysis, stakeholder engagement, meaningful consultation and information disclosure?			
<i>Please provide a justification of your answer</i>			

Will the programme, Project, Activities include a continuing stakeholder engagement process and a grievance redress mechanism and integrated into the management and implementation plans?			
<i>Please provide a justification of your answer</i>			
Would the activities involve or lead to exclusion of any potentially affected stakeholders particularly marginalised groups			
<i>Please provide a justification of your answer</i>			

2 ESS Conclusions & Recommendations ^[6]

(INTERNAL USE ONLY)

The ESS screening found that the proposed activities are consistent with a

Category A

Category B

Category C (no/low ESS risk) classification.

However, several potential environmental and social safeguard risks were identified that should be further considered in Funding Proposal development, through an Environmental and Social Commitment Plan / Management Plan:

- **Manage environmental impacts of construction** – find more sustainable alternatives to sand for small-scale construction (e.g. crushed glass) and encourage sustainable substitutes (timber)
- **Avoid the spread of invasive species** – ensure any sub-project grant awards that include landscaping and tree planting will use native and non-invasive species; partner with the National Environmental Service (NES)
- **Impacts within protected areas** –should a grant application be submitted for a site located within a protected area, the project should have a mechanism to identify and flag this ESS risk for further due diligence
- **Preserve community cultural heritage buildings** – applications should include a question on the heritage and indigenous site status of buildings, and consider cultural heritage status when reviewing value-for-money and cost effectiveness

Sign-off: *Specify the name and designation of the person responsible for completing the environmental and social screening.*

Organisation	Name	Designation	Signature
Applicant / EE			
MFEM ESS			

^[1] http://www.mfem.gov.ck/images/Development/MFEM_Environmental_and_Social_Safeguards_Framework_.pdf

^[2] ESCP is required for Category C projects with potential E&S Risk/Impacts

^[3] Environmental and Social Management Plan or Framework are required for category A & B projects with potential E&S Risks/impacts

^[4] If yes, this will trigger risk categorization as possible A or B, please ensure you justify your answer and the significance of the risk.

^[5] If TBD is checked, you must provide justification, does the activity require further technical studies that are to be completed during the Full Project Proposal stage

^[6] This is for INTERNAL USE ONLY. The MFEM ESS team will complete this section