



Regional Programmatic Approach for Climate Action (RPACA)

Annex 6: Environmental and Social Management Framework

July 2026

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LINKED DOCUMENTS

Linked Document 1: [ADB Environmental and Social Framework \(ESF\) \(2024\)](#)

Linked Document 2: [ESF Environmental Social Risk Classification Form, PIAL, Various Outlines, Templates, Guidance Notes.pdf](#)

Item	Source Document
ADB Templates for Screening, Environmental and Social Risk Classification and Due Diligence, Templates, Guidance Notes	
i.ADB Prohibited Investment Activities List	Refer to Linked Document 1 ADB ESF 2024, Part V
ii.Environmental and Social Risk Classification form	Refer to Linked Document 2 ADB ESF 2024, Section II
iii. Indicative Outline of Environmental and Social Impact Assessment	Refer to Linked Document 2 ADB ESF 2024, Section III
iv.Indicative Outline of Environmental and Social Audit	Refer to Linked Document 2 ADB ESF 2024, Section IV
v.Indicative Outline of Environmental and Social Management System	Refer to Linked Document 2 ADB ESF 2024, Section V
iii.Indicative Outline of Environmental and Social Management Plan	Refer to Linked Document 2 ADB ESF 2024, Section VI
iv.Indicative Outline of a Land Acquisition & Land Use Restriction Plan and Framework	Refer to Linked Document 2 ADB ESF 2024, Section VII
iv.Indicative Outline of a Land Acquisition Framework	Refer to Linked Document 2 ADB ESF 2024, Section VIII
v.Indicative Outline of an Indigenous Peoples Framework	Refer to Linked Document 2 ADB ESF 2024, Section IX
vi.Indicative Outline of an Indigenous Peoples Plan	Refer to Linked Document 2 ADB ESF 2024, Section X
vii. Safety of Dams Requirements	Refer to Linked Document 2 ADB ESF 2024, Section XI
viii. Environmental and Social Standards (ESSs) Guidance Notes	Refer to Linked Document 2 ADB ESF 2024, Section XII
ix. Templates for Stakeholder Engagement Plan and Stakeholder Engagement Framework	Refer to Linked Document 2 ADB ESF 2024, Section XIII
x.Monitoring Report Template for Involuntary Land Acquisition/Land Use Restriction	Refer to Linked Document 2 ADB ESF 2024, Section XIV
xi. Labor Management Plan Template	Refer to Linked Document 2 ADB ESF 2024, Section XV

xii. Grievance Mechanism Good Practice Note	Refer to Linked Document 2 ADB ESF 2024, Section XVI
xiii. ESF Requirements for Disadvantaged/Vulnerable Persons or Groups	Refer to Linked Document 2 ADB ESF 2024, Section XVII

ABBREVIATIONS

ADB	Asian Development Bank
AE	Accredited Entity
AM	Accountability Mechanism
AMA	Accreditation Master Agreement
APR	Annual Performance Report
CAP	Corrective Action Plan
CRP	Compliance Review Panel
CSC	Construction Supervision Consultant
DDR	Due Diligence Report
DMC	Developing Member Country
EHS	Environmental, Health and Safety Guidelines
ESCP	Environmental and Social Commitment Plan
ESAP	Environmental and Social Action Plan
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESF	Environmental and Social Framework (of ADB, and which will be implemented from 1 January 2026)
ESMF	Environmental Social Management Framework
ESMP	Environmental Social Management Plan
ESMS	Environmental Social Management System
ESP	Environmental and Social Policy
ESS	Environmental and Social Standards (of the ADB, and which are currently in force)
FCAS	Fragile and Conflict-Affected Situations
FI	Financial Intermediary
FIL	Financial Intermediary Loan
FSM	Federated States of Micronesia
GDP	Gross Domestic Product
GIP	Good Environmental Practice
GPN	Good Practice Note
GM	Grievance Mechanism
IED	Independent Evaluation Department
IFC	International Finance Corporation
IPPC	Intergovernmental Panel on Climate Change
IPP	Indigenous Peoples Plan
MDB	Multilateral Development Bank
MEL	Monitoring and Evaluation Systems
MSME	Micro, Small and Medium Enterprises
OSF	Office of the Special Facilitator
PES	Payments for Ecosystem Services
PIAL	Prohibited Investment Activities List
PNG	Papua New Guinea
PS	Performance Standards
PSIDS	Pacific Small Island Developing States
RMI	Republic of Marshall Islands
SEAH	Sexual Exploitation, Sexual Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
SIDS	Small Island Developing States
SPC	Pacific Community
SPREP	Secretariat of the Pacific Regional Environment Programme

I. INTRODUCTION

1. This document outlines the Environmental and Social Management Framework (ESMF) for the *Regional Programmatic Approach on Climate Change* (hereafter referred to as *RPACA*). It sets out the standards, processes, and tools that form the basis of the program's environmental and social (E&S) management approach. The ESMF also includes indicative templates and outlines for E&S documents that may be required for the projects proposed under RPACA.

2. The framework describes the key steps that borrowers will undertake to address E&S issues in line with the Asian Development Bank's (ADB) E&S standards under the Environmental and Social Framework (ESF), 2024.

3. This ESMF will apply to all sub-projects implemented under RPACA across the 14 participating countries: Cook Islands, Fiji, Federated States of Micronesia, Kiribati, Republic of Marshall Islands, Nauru, Niue, Palau, Papua New Guinea, Samoa, Solomon Islands, Tonga, Tuvalu, and Vanuatu. It aligns with and adheres to the compliance benchmarks and standards of both the Green Climate Fund (GCF) and the Asian Development Bank (ADB) as the Accredited Entity (AE). This is in accordance with GCF's Revised E&S Policy and Environmental and Social Safeguards (ESS) Standards and GCF's Indigenous Peoples Policy¹, as well as ADB's ESF (ESF, 2024).

4. It should be noted that under Clause 13 of the Accreditation Master Agreement (AMA), 'the Accredited Entity (AE), in this case ADB, is required to promptly notify the GCF Secretariat of any material changes to its environmental and social, fiduciary, or gender policies, procedures, or capabilities that may affect its ability to implement GCF-approved activities in accordance with the terms of the AMA. The AE must confirm whether such changes are consistent with the standards on which the GCF accreditation was granted.'

5. ADB's new ESF, which was approved on 22 November 2024 provides stronger protection for **people and the environment and more effective risk management for projects, while paying closer attention to specific country contexts and needs, with greater emphasis on climate-related vulnerabilities, labour and community impacts, and biodiversity safeguards**. A key feature of the ESF is its more context-sensitive approach, allowing safeguards and risk mitigation measures to be better tailored to country circumstances, institutional capacity, and sector-specific risks - particularly relevant for small islands and climate-vulnerable countries.

6. The revision of ADB's safeguards was initiated following the corporate evaluation of the Safeguard Policy Statement (SPS, 2009) conducted by the Independent Evaluation Department (IED) in May 2020. The evaluation recommended updates to the policy, business processes, and implementation arrangements to enhance effectiveness.

7. In response, ADB launched a comprehensive Safeguard Policy Review and Update (SPRU) process with the objective of:

- (i) modernizing the safeguards policy and aligning it with international good practices;
- (ii) harmonizing with the ESFs of other Multilateral Development Banks (MDBs);
- (iii) addressing the diverse regional contexts and financing modalities of ADB operations; and
- (iv) improving business processes and institutional efficiency.

¹ <https://www.greenclimate.fund/document/indigenous-peoples-policy>

8. The new ESF2 reflects the findings and recommendations informed by extensive analytical work and broad-based stakeholder engagement throughout the SPRU process. The ESF aims to provide a balanced and coherent approach to ensuring safeguard requirements are aligned with peer MDBs, while also incorporating good international practices, addressing emerging E&S challenges, and enhancing the overall effectiveness and efficiency of implementation.

9. ADB would like to confirm that the new ESF policy is considered an improvement and represents compliance with the ESP for which ADB were accredited to the GCF. The benefits of the ESF are:

- (i) stronger protection for people and the environment;
- (ii) more effective management of project risks;
- (iii) aligns ADB's approach with other multilateral development banks;
- (iv) new standards will protect children, workers, and communities from risks;
- (v) a new climate change standard affirms ADB's support for the Paris Agreement;
- (vi) stronger commitment to meaningful consultation, information and disclosure, and grievance mechanisms; and
- (vii) stronger biodiversity protection supporting nature-positive investments.

10. In the Pacific context, the new ESF policy directly supports improved climate risk screening and resilience planning for infrastructure, coastal and public sector investments, helping ensure that projects are aligned with both national priorities and international climate standards. It also strengthens the foundation for regional programming approaches such as the RPACA, by ensuring that investments across sectors are designed with consistent environmental, social, and climate resilience benchmarks. This alignment is particularly important for Pacific Small Island Developing States (SIDS), where high exposure to climate hazards requires integrated safeguards and climate risk management to support sustainable development pathways and improve access to climate finance, including through the GCF.

II. ADB's APPROACH TO ENVIRONMENTAL AND SOCIAL STANDARDS

11. ADB's Strategy 2030³ sets out its vision to sustain efforts to eradicate extreme poverty and to achieve a prosperous, inclusive, resilient, and sustainable Asia and the Pacific. ADB will support the global agenda of sustainable infrastructure development as a source of global growth and social and economic development and believes that the achievement of international commitments, including the Sustainable Development Goals and related Financing for Development agenda, the Paris Agreement on climate change, the Sendai Framework for Disaster Risk Reduction, and the Kunming-Montreal Global Biodiversity Framework will depend on the success of the region in matching the vision.

12. ADB affirms that E&S sustainability is a cornerstone of inclusive and sustainable economic growth and poverty reduction in Asia and the Pacific and seeks to promote sustainability of project outcomes by protecting the environment and present and future human generations from projects' potential adverse impacts, while also recognizing the development priorities and constraints of borrowing countries. ADB is also committed to upholding fiduciary standards that enhance the E&S sustainability of its projects.

13. Inclusive social development is the focus of all ADB's interventions. ADB's corporate policies and strategies recognize significant diversity across its developing member countries

² [Environmental and Social Framework](#).

³ ADB. 2018. Strategy 2030: Achieving a Prosperous, Inclusive, Resilient, and Sustainable Asia and the Pacific.

(DMCs), and apply differentiated approaches to various groups of countries, as necessary. ADB will prioritize financial and technical support for the poorest and most vulnerable countries in Asia and the Pacific, including SIDS and countries in fragile and conflict-affected situations (FCAS). Under ADB's fragile and conflict-affected situations and SIDS approach, ADB undertakes to tailor responses to the needs of the transient challenges of the FCAS and the more permanent vulnerabilities of the SIDS.⁴ A conflict risk assessment is mandated by ADB for all potential projects in FCAS areas.

14. Strategy 2030 also emphasizes human capital development, social inclusion, and gender equality in ADB's operations and activities to ensure the benefits of social and economic growth are extended to all. ADB's operations support the realization of human rights expressed in the Universal Declaration of Human Rights, and ADB will continue, in a manner consistent with its Agreement Establishing the ADB (the Charter), to support its DMCs as they strive to achieve their human rights commitments under the relevant international instruments.

15. In this regard, ADB will promote non-discrimination by working with its DMCs to create enabling environments that provide equitable access to services and benefits and permit meaningful participation of all, including disadvantaged or vulnerable people. To ensure project design and implementation maximize social benefits and inclusion while minimizing adverse social impacts, for each project that ADB supports, ADB undertakes poverty and social analyses and gender analysis to identify and consider potential social risks and issues. This is reinforced through ADB's Social Protection Strategy (2001), under which ADB helps the borrower ensure vulnerable groups are not negatively affected by projects financed or administered by ADB and takes necessary and appropriate steps so that ADB-financed projects comply with the host country's labor legislation, ADB's ESF requirements as well as with the international core labor standards, which cover fundamental principles and the rights at work. ADB's ESF requirements specific to labor and working conditions under Environmental and Social Standards (ESS) 2 outlines key requirements for DMCs to comply with which align with international core labor standards.

16. Further, ADB's Policy on Gender and Development (1998) requires mainstreaming of gender considerations into all ADB activities, including macroeconomic and sector work, and lending and technical assistance operations. Specifically, ADB has facilitated gender analysis of proposed projects and consideration of gender issues at all appropriate stages of the project cycle. ADB is a signatory to the joint statement on continuous advancement of standards to prevent sexual exploitation, abuse, and harassment (SEAH), whereby along with other international financial institutions, it reaffirmed its commitment to prevent SEAH. In line with this, ADB has zero tolerance to SEAH. ADB's ESF under ESS4 requires that a separate mechanism must be developed to receive and respond to all SEAH- incident related concerns and must follow a survival-centered approach.

17. ADB is committed to ensuring its borrowers/clients maintain open dialogue; meaningful consultation; clear, timely, and appropriate disclosure of project information; and a responsive grievance mechanism. Further, if any potential development opportunities, particularly for the host countries and local communities, are identified in connection with a project, ADB will promote and discuss with a borrower/client the feasibility of incorporating such opportunities into project design and implementation and ensuring equitable sharing of project benefits. To encourage inclusive development, ADB is also engaged in policy dialogues with DMCs to introduce climate and gender indicators to support climate- and gender-responsive budgeting at all levels of public financial

⁴ ADB. 2021. Fragile and Conflict-Affected Situations and Small Island Developing States Approach.

management cycle. ADB does not tolerate any form of reprisals in ADB-financed projects and will seek to take all steps within the limits of its ability to collaborate with appropriate parties to address them, including requiring its borrowers/clients to provide protection to project-affected persons who raise concerns or grievances in or about such projects.

18. Strategy 2030 sets out ADB's focus on tackling climate change, building climate and disaster resilience, and enhancing environmental sustainability. In 2023, ADB approved its Climate Change Action Plan, which sets out prioritized intervention areas and enhanced actions rooted in ADB's commitment to provide support (i) aligned with borrower/client priorities, capacities, climate change adaptation needs, and climate change mitigation potential, and (ii) guided by the principles of equitable and socially inclusive transformation.

19. In 2021, ADB committed to full alignment of its operations with the goals of the Paris Agreement⁵. ADB encourages DMCs to take a holistic approach in tackling climate change challenges and promotes the whole economy transformation toward low-GHG emissions and climate resilience. ADB is also mindful of the principle of common but differentiated responsibilities set out for the Parties to the Paris Agreement, which allows countries to reflect their unique circumstances. ADB provides upstream support to DMCs through (i) the development of policies, plans, and strategies including the implementation and monitoring of nationally determined contributions under the Paris Agreement; (ii) the development of long-term low GHG emissions and climate-resilient development strategies; and (iii) mobilization of finance for their implementation. Recognizing that the transformation may impact individuals, communities, and regions, ADB also supports enabling the just transition of its DMCs, employing economy-wide and multi-sector approaches to build the capacity of DMCs. At the project level, ADB has institutionalized a climate risk management framework and tools to guide assessment and management of climate risks. ESS9 on Climate Change under the ESF outlines requirements addressing GHG emissions associated with project activities as well as the assessment and management of climate change risks and impacts that may increase the vulnerability and exposure of project-affected persons. It also requires the conduct of a climate risk assessment, commensurate with the level of potential climate-related risks to the project.

20. ADB is committed to global environmental sustainability. It is a cosignatory to the MDB Joint Statement on Nature, People and Planet (2021), and has committed to mainstreaming nature into its policies, analyses, assessments, advice, investments, and operations. In accordance with this commitment, ADB will assist its DMCs in improving their environmental management, and promoting nature positive investments, including the conservation and restoration of living natural resources, biodiversity, and ecosystems, nature-based solutions, and green infrastructure.

21. To optimize its development impact, ADB provides its own financing while also catalyzing funds from other sources and provides knowledge that fits local conditions and situations and replicates good international practice (GIP). This effort requires working closely with its DMCs to identify strategic interventions to address national development priorities, and to strengthen their governance and institutional framework and implementation capacity necessary for achieving such priorities, in a manner that is sensitive to country-specific contexts and challenges. ADB continuously explores policy dialogues with its DMCs and seeks opportunities to integrate in the project the best available knowledge with financing and institutional capacity development support. ADB is committed to supporting borrowers/clients to strengthen and, if appropriate, to use their E&S systems to achieve developmental outcomes that are materially consistent with the objectives of the ESF.

⁵ ADB. 2023. Climate Change Action Plan, 2023–2030.

22. As a convener of partnerships, ADB will maintain dialogue and collaboration with diverse partners and stakeholders, including international financial institutions, bilateral partners, civil society organizations and philanthropic organizations, and the private sector to enhance the complementarity of respective operations to support ADB's DMCs. ADB also recognizes the importance of early stakeholder engagement and working with local beneficiaries and communities in the design, implementation, and monitoring of ADB operations, and is committed to working with civil society organizations and citizen networks to strengthen transparency and inclusivity in its operations.

23. Through the E&S policy and the Environmental and Social Standards (ESSs), ADBs' institutional aspirations will be translated into mandatory project-level requirements that seek to:

- (i) avoid and, where avoidance is not possible, minimize, mitigate, restore, and/or compensate for adverse impacts of ADB projects on people and the environment, taking into consideration climate change risks;
- (ii) help borrowers/clients strengthen their E&S systems and improve their capacity to manage E&S risks and impacts;
- (iii) promote fair and nondiscriminatory labor and working conditions, and protect project worker and community health, safety, and security, including from any forms of SEAH;
- (iv) support comprehensive and integrated risk and impact assessment and management processes, that also consider specific project and country contexts and implementation needs, including for FCAS and SIDS;
- (v) support the sustainable use of resources, and avoid, minimize, and manage E&S risks and impacts of pollution and waste;
- (vi) avoid, or where avoidance is not possible, minimize or mitigate economic displacement and physical displacement or disruption of livelihoods due to land acquisition and land use restriction and improve or at least restore the standards of living of project-affected persons;
- (vii) promote conservation of biodiversity and ecological functions, and sustainable management of living natural resources and conservation of cultural heritage;
- (viii) promote nondiscrimination among project-affected persons and give particular consideration to Indigenous Peoples⁶ and those who are disadvantaged or vulnerable, taking into account gender-related risks, and promote equitable sharing of development benefits and opportunities resulting from a project; and
- (ix) strengthen stakeholder engagement through meaningful consultation and clear, timely and appropriate disclosure of relevant project information, and prevent threats of reprisal against project-affected persons through effective grievance mechanisms.

24. While the ESF alone will not guarantee sustainable development outcomes, its proper application and implementation by ADB's borrowers and clients will strengthen their governance and institutional frameworks and capacity to manage E&S risks and impacts sustainably and resiliently. This will contribute to meeting national and international commitments and goals for inclusive green economic growth.

III. PROGRAM DESCRIPTION

25. RPACA adopts a transformational bottom-up approach, involving 14 PSIDS and a partnership of Regional Direct Access Accredited Entities (AEs), representing a significant shift

⁶ Noting that the Indigenous Peoples context varies significantly across the target countries.

towards more collaborative and tailored climate finance solutions. It adopts a comprehensive programmatic approach, aiming to deliver large scale and locally led solutions, build capacities, and mobilize financing through national programming cycles, innovative financing modalities, and partnerships. This strategy addresses regional and national climate challenges, promotes sustainable development, and will catalyze impact beyond implementation period. The development process actively engages GCF National Designated Authorities (led by Palau and the Cook Islands), ensuring strong country ownership.

26. The proposed program is strategically aligned with national priorities as outlines in climate policies and strategic plans including amongst other policies, their National Determined Contributions (NDCs) and National Adaptation Plans (NAPs).

27. The RPACA partners seek USD 375 million from GCF, which USD 250 million for ADB (with 739.3 million co-financing), USD 50 million for South Pacific Commission (SPC) and USD 75 million for South Pacific Regional Environment Programme (SPREP) (with co-financing to be confirmed during funding proposal stage for all parties).

A. Climate Change Context

28. The Pacific Small Island Developing States (PSIDS) are on the front lines of the global climate crisis and yet are amongst the most ambitious in climate action, despite contributing the least to the problem. PSIDS countries dedicate significant portions of their domestic budgets, often exceeding 10% of GDP to climate adaptation and resilience efforts. This commitment testifies to their dedication to protecting communities and ecosystems but also places immense pressure on limited national resources. This imbalance highlights the need for international support for the PSIDS countries.

29. The Pacific region, comprised of numerous island nations spread across vast oceanic expanses, is at the forefront of climate change impacts. The Intergovernmental Panel on Climate Change (IPCC) continuously underscores the urgent and unique climate challenges faced by PSIDS countries, emphasizing that these nations are disproportionately vulnerable to the impending impacts of climate change. With their geographical isolation, limited economic diversification, and dependence on climate-sensitive sectors, PSIDS are facing multitude of climate hazards that threaten both their ecological integrity and the well-being of their communities⁷.

30. The financing gap for PSIDS in addressing climate change is significant. According to a recent IMF study⁸, approximately US\$1 billion per year is needed for the Pacific to effectively tackle climate change, highlighting the need for a revamped strategy under GCF's second replenishment. Implementing climate finance in the Pacific face barriers and difficulties, which can be grouped into institutional, technical, financial, social, and environmental challenges:

- (i) Institutional challenges which include limited capacity, complex requirements, and coordination issues.
- (ii) Technical challenges include data availability and quality, project design, implementation, monitoring, and evaluation.

⁷ IPCC, (2021). Summary for Policymakers. In: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change.

⁸ <https://www.imf.org/en/Publications/Departmental-Papers-Policy-Papers/Issues/2024/01/29/Unlocking-Climate-Finance-in-Asia-Pacific-Transition-to-a-Sustainable-Future-541458>.

- (iii) Financial challenges include high costs and limited resources for implementing climate adaptation and mitigation projects, access to finance, sustainability funding and difficulty leveraging private sector resources.
- (iv) Social and political challenges include community engagement, equity, and inclusion.
- (v) Environmental and geographical challenges include geographic dispersion and climate vulnerability.

31. Addressing climate change for PSIDS involves managing this range of interconnected gaps and barriers and requires a multifaceted approach that includes continued investment in strengthening institutional capacities, improving access to climate finance, enhancing public awareness, fostering political commitment, and building resilience of socio-cultural and natural ecosystems. International cooperation and support, particularly in the areas of finance, technology transfer, and capacity building, are essential to help PSIDS overcome these challenges and build a sustainable and climate-resilient future.

32. The RPACA program seeks to transform the approach to climate resilience in the Pacific by fostering regional collaboration, building capacities, and streamlining climate finance. This shift will enable PSIDS countries to adopt large-scale, locally led solutions that bridge the gap between ocean and land-based adaptation strategies, ensuring sustainable development and resilience against climate change impacts.

B. Feasibility Justification

33. The present model for PSIDS countries to access climate finance is an intermittent, interrupted, hesitant process. GCF has a mandate to support climate action for the least developed countries (LCD) and Small Island Developing States (SIDS), and the opportunity to support this innovative regional approach should be a priority. Through these coordinated efforts, the RPACA aims to foster a robust framework for climate action in the Pacific that is reflective of local needs and priorities, drive by a strong climate rationale and ultimately contributes to resilience and sustainable development in the region.

C. Component 1: Enhancing Pacific Island Countries' Access to Climate Finance

34. Component 1 will strengthen Pacific Island Countries' ability to access, mobilize, and manage climate finance at the scale required for transformational adaptation. It will build long-term capacity within Ministries of Finance, national institutions, central banks, financial regulators, and financial institutions to integrate climate and disaster risk into public financial management, fiscal planning, budgeting, investment appraisal, and financial sector regulation.

35. The component will also support the development of adaptation investment pipelines, innovative climate finance instruments, blended finance mechanisms for MSME adaptation lending, and infrastructure de-risking approaches. By improving the enabling environment for climate finance, Component 1 will help shift adaptation finance in the Pacific from fragmented, project-by-project support toward a more programmatic, country-led, and scalable financing ecosystem.

D. Component 2: Protecting Pacific Communities through Climate-Resilient Infrastructure and Coastal Protection

36. Under this component, the program seeks to support the development of climate-resilient infrastructure and coastal protection measures to reduce exposure to climate and disaster risks.

The interventions are designed to safeguard lives, livelihoods, and critical ecosystems of Pacific Island communities by strengthening resilience to coastal erosion, flooding, and extreme weather events, while promoting sustainable and adaptive solutions. Some of the activities identified under this component are as follows:

- (i) Climate-adapted rural and urban and water supply and infrastructure planning.
- (ii) Upgrading critical transport infrastructure to maintain community access to economic opportunities.
- (iii) Accelerating coastal protection in vulnerable areas, including nature-based solutions.
- (iv) Accelerating the uptake of Resilient and Climate Adapted Renewable Energy Systems.
- (v) Empowering communities to withstand climate shocks through resilient health, education, and training.

E. Component 3: Building Climate-Resilient Food, Water and Public Health Systems

37. This component, intended to be developed by the Pacific Community as a separate Funding Proposal to the GCF, would focus on strengthening food and water security while enhancing resilience across water supply, sanitation, and public health systems. It aims to address the growing risks posed by climate variability and extreme weather events by supporting the development of climate-resilient water and sanitation infrastructure, improving the management of food and water resources, and reinforcing the capacity of public health systems to respond to climate-related shocks and stresses. Tentative activities under this component have been identified to support these priority areas and are outlined as follows:

- (i) Strengthening food and water security in the Pacific by promoting climate resilient agricultural practices and innovative water management solutions:
 - a. Promote climate-resilient agricultural practices.
 - b. Improve water management solutions.
 - c. Empower local communities.
 - d. Enhance agricultural productivity.
- (ii) Climate Resilient Water and Sanitation Systems:
 - a. Increase the water storage capacity of Pacific Island communities to support access to safe and adequate potable water supplies throughout all conditions.
 - b. Secure resilient water sources for Pacific communities that are safe from climate extremes.
 - c. Enhance the water management capacity of Pacific communities to efficiently and effectively manage their water resources.
 - d. Improve access to safe and resilient water, sanitation and hygiene facilities that are accessible throughout all conditions.
- (iii) Building Climate Resilient Public Health Systems:
 - a. Develop and expand systems to monitor climate-sensitive diseases.
 - b. Implement targeted programs for vector control, water safety, and management of non-communicable disease risks.
 - c. Address multifaceted impacts of climate change on health through climate-related health policies.
 - d. Invest in climate-proofing healthcare facilities, develop emergency response protocols and stockpile essential resources.
 - e. Develop and implement governance frameworks to coordinate responses across relevant sectors to address the interconnected drivers of climate-sensitive diseases.

- f. Conduct operational research on climate and health links and develop innovative interventions for preventing and managing climate-exacerbated health conditions.

F. Component 4: Strengthening our Resilience: Addressing Pollution and Waste Management Challenges in the Pacific; and Knowledge Sharing; Communication and Coordination

38. This component is intended to be developed by the Secretariat of the Pacific Regional Environment Programme (SPREP) as a separate Funding Proposal to the GCF, which has two main areas of focus. First, it aims to address waste management and pollution control challenges in the Pacific, which are being intensified by the impacts of climate change, including increased weather events, coastal inundation, and pressures on limited waste management infrastructure and addressing climate-related health impacts on communities. Second, the component will support knowledge collation, exchange, collaboration, and coordination among PSIDS. This component will facilitate the sharing of good practices and lessons learned, promote the upscaling and replication of successful climate adaptation and pollution management initiatives, and strengthen regional cooperation and resilience in responding to climate-related challenges in the Pacific region. The following tentative activities have been identified to support the implementation of this component:

- (i) Addressing Pollution and Waste Management Challenges as drivers of climate vulnerability in the Pacific:
 - a. Co-assess the gaps, barriers, and needs of existing systems to inform, develop, and operationalize climate resilient sustainable waste at the industrial, commercial (tourism, agriculture), community and household levels.
 - b. Co-develop national demand driven and climate resilient waste and pollution management policies.
 - c. Co-design and co-implement waste management systems based on circular economy principles, including organic waste composting, resource recovery programs, and strategies to minimize landfill reliance.
 - d. Strengthen community health systems.
 - e. Conduct public education and awareness campaigns.
 - f. Incorporate innovative technologies for waste management.
- (ii) Knowledge sharing, communication, and coordination:
 - a. Establish the knowledge sharing and coordination hub/Unit at SPREP.
 - b. Establish the process and procedures for the co-development and sharing of the knowledge products delivered under the RPACA program.
 - c. Co-develop knowledge products (case studies, best practices, training modules) through workshops/learning sessions.
 - d. Co-develop capacity development services to share and learn from these knowledge products.
 - e. Develop communication products and services to create visibility and awareness to be disseminated through the Pacific Climate Change Portal (PCCP) and other regional portals, social media platforms, and other means.

G. How the Components Work Together

39. The delivery of each component under RPACA adopts a regional approach through engaging regional organizations that are already working and supporting regional work in the

Pacific region and who are also accredited entities for GCF such as South Pacific Commission (SPC) and South Pacific Regional Environmental Programme (SPREP) together with ADB and based on their technical and functional capabilities. Components 1 and 2 will be led and driven by ADB, component 3 by SPC and component 4 to be led by SPREP. ADB with these regional organizations will be coordinating and working closely with Pacific Island governments through the respective ministries and agencies whose functional roles fall under the focus areas.

40. The 10 years of the RPACA will catalyze a paradigm shift that will continue after the period of implementation. Sustainability of impacts will occur through the active involvement of local governments and communities, fostering learning and knowledge- sharing across PSIDS nations. This will ensure that best practices, innovative solutions, and lessons learned are disseminated and applied in a sustainable and culturally relevant manner by:

- (i) Building capacity to equip local stakeholders (government agencies, financial institutions, communities) with the necessary knowledge and tools to implement effective climate strategies.
- (ii) Developing innovative financial mechanisms to enable sustainable investment in climate- resilient activities. The technical support for the development of a regional financial facility will reinforce this building of investment.
- (iii) Contributing to regulatory framework and policies that promote sustainable development aligned with national strategies and the 2050 Blue Pacific Strategy and helps countries achieve their long- term emission reduction plans.
- (iv) Involving other partners to expand RPACA's reach and impact.

41. The contribution of different AEs to reduce climate change vulnerability in the region will be strengthened by a cross-sectoral exchange of knowledge and expertise, allowing each entity to contribute to and learn from a pool of shared experiences and comparative advantage.

42. Together, the components create a full cycle of ecosystem where data informs governance, finance enables scale, local solutions drive innovation, and regional collaboration ensures coherence, sustainability, and mutual benefit.

H. Gender Equity

43. Stakeholder consultations in the design stage of RPACA have supported the development of a gender action plan for the programme implemented by ADB, and subsequently by SPC and SPREP in alignment with their individual frameworks. The gender action plan is aligned with the ADB ESF. In the Pacific context - where social structures, customary practices, and geographic isolation can shape participation of men and women - RPACA adopts a core principle of ensuring that women and men have equitable opportunities to engage meaningfully in stakeholder consultations and decision-making processes across program preparation, implementation, and evaluation. This includes proactive measures to address barriers to participation and ensure inclusive, culturally appropriate engagement. Program monitoring and reporting will systematically capture sex-disaggregated data to track participation, inform adaptive management, and strengthen accountability for gender-responsive outcomes across RPACA interventions.

I. Strategic Impact

44. The RPACA adopts a coordinated, long-term, regional, and programmatic approach grounded in country-specific priorities, while strengthening regional collaboration and shared implementation across PSIDS. By aligning national and regional efforts, the program enhances

coherence, efficiency, and collective impacts in addressing climate change challenges. This approach seeks to strengthen the resilience of PSIDS and support their transition towards low-carbon, climate-resilient, and sustainable development pathways. It does by consolidating resources, harmonizing interventions, and applying transformational and scalable solutions that respond directly to country needs and capacity constraints.

45. It also aims to improve access to climate finance at scale, enhance complementarity among development partners, and strengthen national and regional institutions' ability to plan, implement, and sustain climate investments. By addressing both regional and country-level climate risks, the RPACA promotes inclusive and sustainable development outcomes and is designed to catalyze lasting impacts that extend beyond the program's implementation period, reinforcing long-term resilience and adaptive capacity across the Pacific region.

IV. ENVIRONMENTAL AND SOCIAL MANAGEMENT POLICY AND APPLICABLE REQUIREMENTS

46. The development and implementation of this ESMF was made as part of RPACA's commitment to manage the E&S risks and impacts to avoid, minimize, mitigate, and monitor the potential adverse E&S risks and impacts from implementation of adaptation investments.

47. This ESMF will be implemented and maintained by RPACA as part of its broader risk management strategy and commitment to ESS compliance. It has been developed in alignment with:

- (i) ADB's ESF;
- (ii) The GCF's Revised E&S Policy;
- (iii) Good International Industry Practice; and
- (iv) Relevant national and local laws of recipient countries.

48. The ESMF will guide RPACA to systematically address E&S risks and impacts across its current and future adaptation investment portfolio.

A. Environmental and Social Risk Categorization of RPACA Projects

1. Environmental and Social Risk Categorization

49. Under ADB's ESF, all projects and subprojects financed under the RPACA will be screened and classified for environmental and social (E&S) risks and impacts at the earliest stage of preparation once sufficient project information becomes available. This screening process is described in detail in Section V of this ESMF and is guided primarily by ESS1: Assessment and Management of Environmental and Social Risks and Impacts, with due consideration of ESS2–ESS10.

50. Applicable **Environmental and Social Standards (ESSs)**. Risk categorization considers the relevance and applicability of the following Environmental and Social Standards (ESSs):

- (i) ESS1: Assessment and Management of Environmental and Social Risks and Impacts
- (ii) ESS2: Labour and Working Conditions
- (iii) ESS3: Resource Conservation and Pollution Prevention
- (iv) ESS4: Health, Safety, and Security
- (v) ESS5: Land Acquisition and Land Use Restrictions
- (vi) ESS6: Biodiversity Conservation and Sustainable Natural Resources Management

- (vii) ESS7: Indigenous Peoples
- (viii) ESS8: Cultural Heritage
- (ix) ESS9: Climate Change
- (x) ESS10: Stakeholder Engagement and Information Disclosure

B. Risk Classification Approach

51. Section V of the ESMF ADB classifies projects into one of four E&S risk categories: *High Risk*, *Substantial Risk*, *Moderate Risk*, or *Low Risk*. The classification is determined through an integrated assessment of the following key factors:

1. **Project Characteristics**
 - a. Type, location, scale, and sensitivity of activities
 - b. Nature of proposed infrastructure or interventions
2. **Nature and Magnitude of Potential Risks and Impacts**
 - a. Risks and impacts addressed under ESS2–ESS10, including biodiversity impacts, land acquisition, impacts on Indigenous Peoples, labor conditions, pollution, waste management, climate change risks, cultural heritage, and stakeholder engagement
 - b. Degree of vulnerability or disadvantage of project-affected persons
 - c. Potential cumulative, transboundary, and climate-related impacts
 - d. Likely effectiveness of mitigation measures following the mitigation hierarchy.
3. **Institutional Capacity and Commitment**
 - a. Capacity, experience, and track record of the borrower/client and implementing agencies
 - b. Ability to manage E&S risks in accordance with the ESSs
4. **Mitigation Feasibility**
 - a. Availability, effectiveness, and reliability of mitigation technologies or methodologies
 - b. Availability of data and monitoring mechanisms

C. Contextual Risk Factors

52. The overall risk classification also considers contextual and country-specific factors, including:

- (i) national legal, regulatory, and institutional frameworks
- (ii) human security, social conflict, and civic space conditions
- (iii) fragility, conflict, or post-conflict conditions (if applicable)
- (iv) small island developing state (SIDS) characteristics
- (v) capacity and financial constraints
- (vi) ecosystem and climate vulnerability, natural hazards, and external economic shocks
- (vii) sector- or industry-specific risks, including digital risks
- (viii) presence of marginalized, disadvantaged, or vulnerable groups
- (ix) risks of non-compliance with ADB's Prohibited Investment Activities List
- (x) relevant international obligations of the host country

D. Risk Category Definitions

53. ADB will classify each project as follows:

- (i) **High risk.** A proposed project is classified as High Risk if it is likely to have significant adverse impacts that are irreversible, diverse, or unprecedented, after considering the following factors, as applicable, in an integrated manner, together with relevant contextual factors.
 - a. The project is likely to generate wide range of significant adverse risks and impacts on human populations or the environment. This could be because of the complex nature or scale of the project, and/or the sensitivity of the location(s) of the project. This would consider whether the potential E&S risks and impacts associated with the project have the majority or all the following characteristics:
 - (i) Long term, permanent, and/or irreversible impacts that are impossible to avoid entirely due to the nature of the project.
 - (ii) High in magnitude and/or in spatial extent;
 - (iii) Significant adverse cumulative impacts;
 - (iv) Significant adverse transboundary impacts; and
 - (v) a high probability of significant adverse impacts to human health and/or the environment.
 - b. The area is likely to be affected is of high value and sensitivity and includes lands or rights of Indigenous Peoples and other vulnerable minorities, intensive or complex land acquisition and land use restriction, impacts on cultural heritage, or densely populated urban areas.
 - c. Some of the significant adverse E&S risks and impacts of the project cannot be mitigated or specific mitigation measures require complex and/or unproven mitigation compensatory measures or technology, or sophisticated social analysis and implementation.
- (ii) **Substantial risk.** A proposed project is classified as Substantial Risk after considering the following factors, as applicable, in an integrated manner, together with relevant contextual factors:
 - a. The project may not be as complex as a High-Risk project. The nature and scale of its E&S risks and impacts may be smaller, and the location may not be in such a highly sensitive area, but some adverse risks and impacts may be significant. This would consider whether the potential E&S risks and impacts have the majority or all the following characteristics:
 - (i) They are mostly temporary, predictable, and/or reversible, and the nature of the project does not preclude the possibility of avoiding or reversing them;
 - (ii) There are concerns that the adverse social impacts of the project, and the associated mitigation measures, may give rise to a limited degree of social conflict, harm, or risks to human security;
 - (iii) They are medium in magnitude and/or in spatial extent;
 - (iv) The potential for cumulative and/or transboundary impacts may exist, but they are less severe and more readily avoided or mitigated than for High-risk projects; and
 - (v) There is medium to low probability of significant adverse impacts to human health and/or the environment, and there are known and reliable mechanisms available to prevent or minimize such incidents.

- b. The effects of the project on areas of high value or sensitivity are expected to be lower than High Risk projects.
 - c. Mitigation and/or compensatory measures may be designed more readily and be more reliable than those of High-Risk project.
- (iii) **Moderate risk.** A proposed project is classified as Moderate Risk after considering the following factors, as applicable, in an integrated manner, together with relevant contextual factors:
- a. The potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. This is because the project is not complex and/or large, does not involve activities that have high potential for harming people or the environment, and is located away from environmentally to socially sensitive areas. As such, the potential E&S risks and impacts are likely to have the following characteristics:
 - (i) Predictable and expected to be temporary and/or reversible;
 - (ii) Low in magnitude;
 - (iii) Site-specific, without likelihood of impacts beyond the actual footprint of a project; and
 - (iv) Low probability of significant adverse impacts can be easily mitigated in a predictable manner.
- (iv) **Low risk.** A proposed project is classified as Low Risk if its potential adverse risks and impacts on human populations and/or the environment are likely to be minimal or negligible.

54. The actual E&S risks and impacts of projects to be supported by RPACA are determined by factors that include sector, size, sensitivity and magnitude of potential risks and impacts. This will be established during individual screening of projects in line with the procedures outlined in this framework. A detailed list of E&S risks associated with the nature of activities identified per RAPA component/outcome is provided in Table 1.

Table 1. Anticipated Environmental and Social Risks and Impacts Considered Against the ADB ESF, 2024

RPACA Outcome	Nature of Tentative Activities	Anticipated Risks	
		Overall E&S Risks (ESS1, ESS2, ESS32, ESS4, ESS5, ESS6, ESS7, ESS8, ESS9, ESS10	Key ESF Considerations for RPACA
Component 1: Enhancing Pacific Island's Access to Climate Finance			
Outcome 1.1 Climate-, disaster-, and gender-responsive* public financial management (PFM) capacity of Pacific Island Countries' Ministries of Finance and national institutions strengthened	Budget reform, climate tagging, fiscal policy strengthening, institutional capacity building	As proposed, the activities here only relate to capacity development, the overall E&S risks will be 'Low'.	Likely low risk; indirect downstream risk through future financed investments
	Risk analytics, fiscal planning, development of programmatic pipelines, diversifying climate finance instruments,	Proposed activities only involve institutional strengthening and meetings. The overall E&S risks will be 'Low'.	Requires institutional safeguards to ensure participatory budgeting and inclusion of customary governance systems
Outcome 1.2 Climate-resilient and inclusive financing for MSMEs and infrastructure is expanded/scaled-up through innovative and scalable financial instruments by Pacific financial institutions.	Launch blended finance facilities for adaptation lending to MSMEs, strong focus on women; Pilot / launch infrastructure de-risking facilities across selected SIDS	Proposed specific activities to be financed are unclear at this stage. However, based on the nature of the proposal the likely overall E&S risks will be "Moderate". Activities are unlikely to directly cause environmental and social impacts, potential indirect portfolio exposure to environmentally and social sensitive sectors Activities are unlikely to directly cause involuntary resettlement, require land access or impacts livelihood. Low risk of exclusion of IP and customary land tenure systems in instruments; However, these facilities also present an opportunity to strengthen inclusion by integrating traditional knowledge into the development and implementation of innovative finance solutions, thereby enhancing culturally grounded and locally relevant outcomes.	Requires ESMS screening of financial intermediaries; safeguards embedded in FI operations; careful exclusion of maladaptive investments in design of facilities

RPACA Outcome	Nature of Tentative Activities	Anticipated Risks	
		Overall E&S Risks (ESS1, ESS2, ESS32, ESS4, ESS5, ESS6, ESS7, ESS8, ESS9, ESS10)	Key ESF Considerations for RPACA
Outcome 1.3 Financial sector authorities and financial institutions adopted regional and international aligned climate finance approaches	Strengthening capacity of reserve banks; strengthen capacity of local banks and insurance companies.	Proposed activities involve only capacity strengthening. The overall E&S risk is 'Low'.	ESF applies primarily through financial intermediary (FI) safeguards; requires strengthening of ESMS in banks/insurance institutions to screen, manage, and monitor environmental and social risks in financed subprojects; emphasis on avoiding maladaptive finance pathways
Component 2: Component 2: Protecting Pacific Communities through Climate-Resilient Infrastructure and Coastal Protection			
Outcome 2.1: Climate resilience of communities, infrastructure systems, and institutions in Pacific Island Countries strengthened with gender equality and social inclusion mainstreamed.	Climate risk screening in planning for transport, water, energy, coastal infrastructure	The proposed activities involve only screening in planning for transport, water, energy and coastal infrastructure infrastructural investments. The overall E&S risks of this activity are expected to be 'Low' Activities are unlikely to cause impacts to Indigenous Peoples; Planning of coastal and land-use may focus on vulnerable communities where there are potential customary land rights issues, conflicts over coastal zones and undertaking relocation planning.	ESF considerations primarily relate to strategic-level risk screening (e.g. climate risk vulnerability assessment type approaches); it requires early identification of downstream E&S risks, particularly where planning informs coastal protection, relocation, or land-use change in customary land areas where infrastructure investments are targeted
	Physical infrastructure investments, coastal protection works, flood management, energy systems upgrade, urban resilience	The proposed activities will involve civil works and E&S potential, and actual overall E&S risks will be "High"	All activities proposed here would require ESIAs, LAFs and/or LAPs, ESCP and/or ESAP, SEPs.
		The E&S risks and impacts likely to be generated will mostly be temporary, predictable and/or reversible.	

55. Based on the activity with the highest anticipated E&S risks and impacts, and in accordance with the requirements of ADB's ESF and its relevant standards, the overall E&S risk classification for the Programme is **High**. As specific activities are identified and confirmed through consultations with the relevant DMCs the E&S risk classifications may be reviewed and updated, as appropriate. The applicable E&S documentation requirements, including the level and detail of

E&S information required for each activity, will be determined based on the overall E&S risk classification of each specific activity.

56. The proposed activity classified as High Risk in Table 1 relates to the proposed development of a multipurpose dam in Samoa⁹. Environmental and social (E&S) documentation and management plans will be prepared as part of ADB due diligence process to address the anticipated E&S risks and impacts associated with this project. The High-Risk classification is primarily due to the presence of a Key Biodiversity Area (KBA) in the vicinity of the project. To address potential impacts on biodiversity, the project includes a dedicated biodiversity component designed to enhance conservation outcomes and ensure effective monitoring and management of key environmental values. In addition, a Biodiversity Trust Fund will be established as part of the project to support the implementation of mitigation measures and biodiversity offset plans throughout the project lifecycle. The implementation of these measures will involve collaboration with local communities, non-governmental organizations (NGOs), and relevant government agencies to ensure effective and sustainable biodiversity management.

E. Policy Principles

57. **ADB's Environmental and Social Framework (ESF) 2024.** Consistent with the ADB ESF (2024), RPACA E&S management policy aims to: (i) avoid, and where avoidance is not possible, minimize, mitigate, restore and/or compensate for adverse impacts of projects on people and people and environment, taking into consideration climate change risks; (ii) help clients strengthen their E&S systems and improve their capacity to manage E&S risks and impacts; (iii) Promote fair and nondiscriminatory labor and working conditions, and protect project worker and community health, safety, and security, including any forms of SEAH; (iv) Support comprehensive and integrated risk and impact assessment and management processes, that also considers specific project and country contexts and implementation needs, including for FCAS and SIDS; (v) Support the sustainable use of resources, and avoid, minimize, and manage E&S risks and impacts of pollution and wastes; (vi) Avoid, or where avoidance is not possible, minimize or mitigate economic displacement and physical displacement or disruption of livelihoods due to land acquisition and land use restriction and improve or at least restore the standards of living of project-affected persons; (vii) Promote conservation of biodiversity and ecological functions, and sustainable management of living natural resources and conservation of cultural heritage; (viii) Promote nondiscrimination among project-affect persons and give particular consideration to Indigenous Peoples and those who are disadvantaged or vulnerable, taking into account gender-related risks, and promote equitable sharing of development benefits and opportunities resulting from a project; and (ix) Strengthen stakeholder engagement through meaningful consultation and clear, timely and appropriate disclosure of relevant project information, and prevent threats of reprisal against project- affected persons through effective grievance mechanism.

58. ADB is committed to supporting clients in the development and implementation of projects that are environmentally and socially sustainable to enhancing the capacity of clients to use their E&S systems to assess and manage the E&S risks and impacts of such projects. To help clients achieve the desired outcomes of projects, ADB requires the clients to apply and implement the ten (10) Environmental and Social Standards (ESSs), proportionate to the nature and scale of project's E&S risks and impacts performance. ADB staff, through review and monitoring, will assist clients to apply the requirements of the ESSs throughout a project cycle, in accordance with the E&S Policy. For RPACA, this requirement will apply to all participating governments and

⁹ Brief description of the Alaoa Multipurpose Dam Project: <https://www.adb.org/news/events/samoa-alaoa-multipurpose-dam-project-early-market-engagement>

implementing agencies, who will be required to apply the ten ESSs under the ADB ESF proportionate to project risks, with compliance ensured through ADB's due diligence, capacity support, and ongoing review and monitoring throughout the project cycle.

59. **GCF's Revised Environmental and Social Policy** and GCF Indigenous People Policy. In line with GCF's Revised E&S Policy and Indigenous People Policy, for a GCF-supported activity RPACA will commit to: (i) avoid, and where avoidance is impossible, mitigate adverse impacts to people and the environment; (ii) avoid, and where avoidance is not possible, mitigate the risks of sexual exploitation, sexual abuse and sexual harassment (SEAH) to people impacted by GCF-financed activities; (iii) enhance equitable access to development benefits; and (iii) give due consideration to persons vulnerable positions and situations marginalized populations, groups, and individuals, including women and girls, local communities, Indigenous Peoples, and other marginalized groups of people and individuals that are affected or potentially affected by GCF-financed project activities and are especially vulnerable to exploitation or other potentially harmful or unintended impacts.

F. Applicable Environmental and Social Standard Requirements

60. For all proposed investments and activities, RPACA will ensure that:
- (i) all investments are screened against the Prohibited Investment Activities List (PIAL) (Linked Document 1, ADB ESF 2024);
 - (ii) all investments with risks and impacts considered limited with low to high magnitude are reviewed and evaluated against ESSs of ADB's ESF (2024);
 - (iii) all investments are reviewed and evaluated against the national laws, regulations, and standards on environment, health, safety, labor and working conditions, land acquisition and access, Indigenous Peoples, and physical cultural resources.
 - (iv) E&S risks and impacts are minimized and mitigated in line with the requirements of national laws and regulations and ESS requirements of ADB, GCF and international good practice as reflected in internationally recognized standards such as the World Bank Group's Environment, Health, and Safety Guidelines; and
 - (v) all investments financed by the GCF are developed and implemented in such a manner that aligns/complies with the GCF ESS and revised E&S Policy, and GCF Indigenous People Policy¹⁰

V. ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES

61. Recognizing that management of environmental and social (E&S) risks and impacts is influenced by project context, ADB is committed to understanding the conditions and constraints under which a project is prepared and implemented. ADB will work closely with clients to develop proportionate, risk-based measures tailored to address the specific E&S risks and impacts associated with each project and activity, in accordance with the Environmental and Social Framework (ESF).

A. Screening and Risk Classification

1. ADB

¹⁰ <https://www.greenclimate.fund/document/indigenous-peoples-policy>

62. In line with ADB's ESF, all activities and investments financed under the RPACA will be screened and assigned an environmental and social risk classification (Appendix 1) at the earliest stage of preparation once sufficient information becomes available.

63. ADB will undertake the following steps as part of the screening and risk classification process for RPACA investments:

- (i) Screening against the Prohibited Investment Activities List (PIAL). All proposed activities will be screened against ADB's PIAL. If the activity is not excluded under Stage (1) of the PIAL screening, it will proceed to Stage (2) screening.
- (ii) Environmental and Social Risk Screening and Classification. Proposed activities and investments will be screened and classified against the Environmental and Social Standards (ESS1-ESS10).
- (iii) Integrated Risk Classification under ESS1. In accordance with ESS1, each activity or investment will be assigned an overall E&S risk classification, considering:
 - a. The inherent environmental and social risks and impacts of the proposed activity;
 - b. Relevant contextual risks; and
 - c. Risks and impacts identified under ESS2-ESS10.

B. Application of the Environmental and Social Standards (ESS)

64. The screening process will consider the relevance of each ESS as follows:

- (i) **ESS 1: Assessment and Management of E&S risks and impacts** will provide the overall E&S risks classification for each activity or investment, including contextual risks and risks identified under other ESSs.
- (ii) **ESS 2: Labor and Working Conditions** assesses risks and impacts related to labor management, working conditions and worker rights including the establishment of a grievance mechanism for workers. Depending on the scale and nature of work and labor required, a Labour Management Plan or Procedure may be required that shall follow requirements under ESS2.
- (iii) **ESS 3: Resource Conservation and Pollution Prevention** assesses risks and impacts related to resources efficiency, waste management, emissions, and pollution prevention.
- (iv) **ESS 4: Health, Safety and Security** assesses risks and impacts to workers and community health and safety, management of Sexual Exploitation Abuse and Harassment (SEAH) related incidents, including project-related hazards and security considerations and safety of dams.
- (v) **ESS 5: Land Acquisition and Land Use Restrictions** assesses risks and impacts related to land acquisition, land use restrictions, and involuntary resettlement.
- (vi) **ESS 6: Biodiversity Conservation and Sustainable Natural Resources Management** assesses risks and impacts on biodiversity, ecosystems, and sustainable use of natural resources.
- (vii) **ESS 7: Indigenous Peoples** assesses risks and impacts on indigenous peoples, including potential effects on livelihoods culture and rights.
- (viii) **ESS 8: Cultural Heritage** assesses risks and impacts on tangible and intangible cultural heritage.
- (ix) **ESS 9: Climate Change** assesses climate-related risks and impacts, including greenhouse gas (GHG) emissions and climate resilience considerations.
- (x) **ESS 10: Stakeholder and Information Disclosure** assesses risks and impacts related to stakeholder engagement, access to information, considerations of

disadvantaged and vulnerable project-affected persons and the establishment of project grievance mechanism.

65. Under ADB's ESF 2024, the requirements for Financial Intermediaries will apply to RPACA activities where GCF and/or ADB proceeds are channeled through, or implemented with, participating financial institutions, including national development banks, commercial banks, guarantee facilities, or other financial intermediaries supporting MSME adaptation lending, blended finance mechanisms, credit guarantees, or infrastructure risk-transfer instruments. In these cases, the FI will be required to identify, assess, manage, monitor, and report on environmental and social risks associated with the activities it finances, in a manner proportionate to the nature, scale, and risk profile of the FI portfolio and underlying subprojects.

66. For RPACA, this is particularly relevant to Component 1 activities that establish or support financial mechanisms for climate-resilient MSME lending, portfolio guarantees, and other adaptation finance instruments. Although many of these activities are expected to have limited direct environmental and social impacts, they may create indirect or downstream risks where financed MSME or infrastructure-related activities involve land use, construction, resource use, pollution, occupational health and safety risks, community health and safety risks, impacts on vulnerable groups, or risks of maladaptation. Accordingly, participating FIs will be subject to ADB due diligence before engagement and will be required to have, or establish, an environmental and social management system (ESMS) acceptable to ADB.

67. The ESMS will include procedures for screening proposed FI-supported activities against ADB's Prohibited Investment Activities List, classifying environmental and social risk, applying relevant ADB Environmental and Social Standards, and ensuring that subprojects comply with national law, ADB ESF requirements, GCF environmental and social requirements, and good international practice where applicable. The ESMS will also include procedures for excluding high-risk or ineligible activities where the FI does not have the capacity, mandate, or approval to manage such risks; defining when enhanced due diligence or ADB prior review is required; and ensuring that mitigation measures are incorporated into financing agreements with FI clients.

68. Participating FIs will also be required to ensure appropriate stakeholder engagement, information disclosure, and grievance arrangements for supported activities, proportionate to the risks and impacts. Where subprojects financed through FIs involve activities with material environmental or social risks, relevant environmental and social assessment and management documents will be prepared and disclosed in accordance with ADB's Access to Information Policy, ESS10 on stakeholder engagement and information disclosure, and applicable GCF disclosure requirements. FI clients will also be required to maintain accessible grievance mechanisms, including worker grievance mechanisms where relevant, and arrangements to manage SEAH-related risks where applicable.

69. ADB will undertake due diligence of each participating FI's existing policies, institutional capacity, staffing, procedures, track record, and portfolio risk exposure. Where gaps are identified, ADB will agree with the FI on time-bound corrective actions or capacity-strengthening measures, which may be reflected in an Environmental and Social Action Plan or equivalent commitment framework. ADB will also monitor FI implementation through periodic reporting, portfolio reviews, and, where necessary, sample-based review of underlying subprojects. This will ensure that FI-supported activities under RPACA remain consistent with ADB's ESF 2024, GCF requirements, and the overall objectives of the RPACA ESMF.

70. In practical terms, RPACA will therefore apply a tiered approach: (i) all FI-supported activities will be screened for eligibility and E&S risk; (ii) participating FIs will maintain ESMS procedures acceptable to ADB; (iii) higher-risk or sensitive activities will be subject to enhanced review, additional assessment, or exclusion; (iv) disclosure, consultation, and grievance requirements will be applied proportionate to risk; and (v) ADB will retain oversight through due diligence, legal covenants, monitoring, and corrective action requirements. This approach will allow RPACA to use financial intermediaries to scale adaptation finance while ensuring that environmental and social risks are identified, managed, and monitored in line with ADB's ESF 2024.

C. Review and Updating of E&S Risk Classification

71. Following the results of screening and E&S risk classification, the investment will be classified according to the following categories: High Risk (with significant, irreversible, diverse, or unprecedented adverse environmental and/or social impacts); Substantial Risk (with potentially significant adverse risks and impacts that are generally predictable, temporary, or reversible but may require careful management); Moderate Risk (with limited, site-specific risks and impacts that are predictable, low in magnitude, temporary, and readily mitigated using standard measures), and Low Risk (with minimal or negligible adverse environmental or social risks and impacts).

72. In accordance with ADB's ESF, the E&S risk classification of RPACA activities and investments will be reviewed periodically through project preparation and implementation. The risk classification may be updated where there are material changes in project design, scope, location, implementation arrangements, contextual conditions, or where new information on environmental or social risks and impacts becomes available. Any change in the E&S risk classification will be documented, reflected in the scope and content of applicable environmental and social assessment, and disclosed in accordance with ADB's disclosure requirements.

Table 2: Screening and Risk Classification Process

Step	Process Stage	Key Actions	Responsibility	Outputs
1	Initial screening	Screen proposed activity against ADB's PIAL	ADB	Confirmation of eligibility of exclusion
2	Preliminary E&S Screening	Apply environmental and social screening checklist to identify potential risks and impacts across ESS1-ESS10.	ADB	Initial identification of E&S risks
3	Risk Classification	Assign overall E&S risk classification (High, Substantial, Moderate, Low) under ESS1, informed by ESS2-ESS10	ADB	Confirmed E&S risk category
4	Determination of Instruments	Define required E&S instruments	ADB/Client	E&S instrument requirements

		proportionate to the assigned risk classification		
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73. RPACA will address risks of SEAH through its safeguards framework, in line with the ADB ESF, with a particular focus on subprojects involving civil works and coastal infrastructure in the Pacific. For such investments - where labor influx, remote island locations, and community interface can heighten risks - SEAH risk assessments will be conducted as part of due diligence process, alongside training for contractors, project management units, and local partners. While SEAH actions are managed under safeguards rather than gender action plans, RPACA will ensure that mitigation measures are budgeted and implemented, including awareness programs, codes of conduct, and periodic audits.

74. Additionally, RPACA will be guided by the ADB's Good Practice Note¹¹ (GPN) to strengthen operational approaches to addressing SEAH risks in its operations with a specific focus on sovereign projects with civil works.¹² RPACA will ensure that adequate information will be provided to enable the GCF review.

75. RPACA will apply the requirements of ADB ESS7 (Indigenous Peoples (IPs)) and the GCF Indigenous Peoples Policy to all Program and subproject activities that may affect IPs. These requirements apply regardless of whether impacts are positive, negative, direct, indirect, cumulative, or unintended. Consequently, activities expected to generate benefits for IPs will remain subject to environmental and social screening, meaningful consultation, and, where applicable, Free, Prior and Informed Consent (FPIC) requirements.

76. Environmental and social screening will determine whether IPs are present in, have collective attachment to, or may be affected by a proposed activity, and whether they constitute the sole or overwhelming majority of direct beneficiaries. Consultation and monitoring data relating to IPs will be disaggregated, as appropriate, by sex, age, vulnerability status, and affected community or village, with additional categories applied where relevant to support inclusive participation and identify differentiated impacts and benefits.

77. RPACA will apply the requirements of ADB ESS7 and the GCF Indigenous Peoples Policy on a country-specific and subproject-specific basis. Where screening confirms that IPs are the sole or overwhelming majority of direct beneficiaries and are not expected to experience differentiated adverse impacts, the Program may apply the exemption provided under Paragraph 43 of the GCF Indigenous Peoples Policy. Such determinations will be documented through the environmental and social screening process. In these circumstances, a stand-alone Indigenous Peoples Plan (IPP) may not be required, and the applicable requirements of ADB ESS7 and the GCF Indigenous Peoples Policy will instead be integrated into project design, environmental and social management instruments, stakeholder engagement processes, implementation arrangements, and monitoring systems.

78. For subprojects in Melanesian countries, where distinct clans, tribes, customary groups, or Indigenous communities may have different land tenure systems, governance structures, cultural practices, and vulnerability profiles, additional assessment will be undertaken to identify any

¹¹ ADB. 2023. [Good Practice Note on addressing Sexual Exploitation, Abuse and Harassment in ADB Finance Projects with Civil Works](#). Manila.

¹² The project team will use an SEAH risk assessment tool, to generate a risk categorization through the input of country and project-specific information. The four risk categories are low, moderate, substantial, and high.

differentiated impacts and determine whether specific IPs planning measures are required. Where the Paragraph 43 exemption applies, the Program will ensure that key IPs planning elements are incorporated into relevant project instruments, including: (i) assessment of risks, impacts, and opportunities; (ii) culturally appropriate consultation and participation; (iii) equitable and culturally appropriate benefit sharing; (iv) measures to avoid, minimize, mitigate, or compensate adverse impacts; (v) FPIC processes where required; (vi) implementation and monitoring arrangements; (vii) culturally appropriate grievance mechanisms; and (viii) documentation of consultation outcomes and commitments. Where screening identifies potential adverse or disproportionate impacts on IPs, differentiated impacts among Indigenous communities, or mixed-beneficiary subprojects, a site-specific IPP or equivalent instrument will be prepared in accordance with ADB ESS7. The IPP will be proportionate to the nature and significance of impacts and will include measures to manage risks, enhance culturally appropriate benefits, support meaningful participation, establish FPIC processes where applicable, and provide monitoring, reporting, and grievance management arrangements.

79. Where IPs are present, have collective attachment to, or may be affected by Program activities, the Program will implement the FPIC process in accordance with ADB ESS7 and the GCF Indigenous Peoples Policy. FPIC will be required for activities that may affect Indigenous Peoples' rights, interests, lands, territories, natural resources, cultural heritage, traditional knowledge, livelihoods, or customary resource use. FPIC will be undertaken during subproject preparation and completed before approval and implementation of any activity requiring consent. No activity subject to FPIC will proceed until the process has been satisfactorily completed and documented. The FPIC process will be undertaken through culturally appropriate, inclusive, gender-responsive, and good-faith engagement that is free from coercion, intimidation, manipulation, or undue influence. It will respect customary governance structures and decision-making processes and ensure the meaningful participation of women, youth, elders, persons with disabilities, and other potentially marginalized groups. Where applicable, the FPIC process will include: (i) identification of affected IPs and potential impacts; (ii) verification of representative customary decision-making institutions; (iii) disclosure of timely, accessible, and culturally appropriate information; (iv) meaningful and iterative consultations; (v) adequate time for community deliberation; (vi) agreement on mitigation, benefit-sharing, and other commitments; and (vii) documentation of community decisions and consent outcomes.

80. RPACA will maintain documented records of the FPIC process, including consultations, information disclosure, agreements, grievances, and evidence of consent. FPIC will be treated as an ongoing process throughout implementation to monitor commitments and address emerging issues. Where consent is not obtained for activities requiring FPIC, the activity will not proceed unless concerns are resolved in accordance with ADB ESS7, the GCF Indigenous Peoples Policy, and applicable national requirements. Regardless of whether a stand-alone IPP is required, the Program will ensure that the principles of meaningful consultation, FPIC where applicable, protection of customary rights and interests, equitable access to benefits, culturally appropriate engagement, grievance redress, and respect for Indigenous Peoples' dignity, human rights, cultures, territories, livelihoods, and traditional knowledge are integrated into Program implementation.

2. GCF

81. Like ADB's ESF, GCF's Environmental and Social (E&S) Policy, will be checked to ensure compliance. As per para. 27 of GCF's Revised E&S Policy on screening and risk categories, among the risks and impacts to be considered include SEAH risks. RPACA will ensure that the risk category is proportional to the nature, scale and location of activity including in relation to the SEAH consistent with para. 31 of the GCF Revised E&S Policy.

82. GCF's E&S Policy outlines the following ESSs which each RPACA investments and activities will be screened and assessed against to ensure compliance:

- (i) ESS1- Assessment and Management of environmental and social risks and impacts.
- (ii) ESS2- Labour and Working Condition.
- (iii) ESS3- Resource Efficiency and Pollution Prevention
- (iv) ESS4- Community Health, Safety and Security.
- (v) ESS5- Land Acquisition and Involuntary Resettlement.
- (vi) ESS6- Biodiversity Conservation and Sustainable Management of Living Natural Resources
- (vii) ESS7- Indigenous Peoples
- (viii) ESS8- Cultural Heritage
- (ix) ESS9- Stakeholder Engagement and Information Disclosure
- (x) ESS10- Climate Change Resilience and Adaptation

83. Further to actions identified in paragraph 65 above, RPACA will “Avoid, and where avoidance is impossible, mitigate the risks of SEAH to people impacted by GCF-financed activities. “Operationalizing this, including the principle of zero-tolerance to SEAH calls for the requirements for E&S risk assessment and management, including SEAH risks, to be aligned to GCF ESS standards and to prevent and respond effectively to SEAH in a survivor-centered and gender-responsive way. It will adhere to GCF’s Action Plan for Addressing Sexual Exploitation, Sexual Abuse and Sexual Harassment (SEAH Action Plan) and adopt the SEAH risk assessment guideline. AE will seek guidance from GCF as necessary in undertaking SEAH risk assessment and including the use of the SEAH risk assessment tool.

84. Sub-project-level grievance mechanisms will be strengthened to safely receive and respond to SEAH-related complaints and incidents, ensuring confidentiality and survivor-centered approaches. In the Pacific context, RPACA will also promote cross-country learning and alignment with national systems, helping build institutional capacity to prevent and respond to SEAH risks across similar operating environments.

85. GCF's Revised E&S Policy requires activities to be screened for potential adverse impacts on the promotion, protection, respect for, and fulfilment of human rights, including SEAH risks. Screening may be complemented by human rights due diligence where relevant. Under RPACA, ADB will also assess whether proposed subprojects may create, exacerbate, or be affected by social conflict or human security risks. This assessment will form part of the E&S screening and risk classification process under ADB's ESF 2024 and will consider, as relevant, risks associated with community health and safety, land acquisition and land use restrictions, customary land and resource tenure, Indigenous Peoples, stakeholder opposition, exclusion of vulnerable and disadvantaged individuals or groups, benefit sharing, grievances, civic space, and security arrangements. Where potential conflict risks are identified, the subproject due diligence process will include proportionate conflict-sensitive social assessment and stakeholder analysis, and may include human rights due diligence where relevant. Management measures will be incorporated into the applicable safeguards instruments, including the ESMP, SEP, LAF/LAP, IPP, ESCP/ESAP, or other action plans, as appropriate. Such measures may include conflict-sensitive design or siting, avoidance of activities that could intensify existing tensions, inclusive and culturally appropriate consultation, transparent communication on project benefits and impacts, equitable benefit-sharing arrangements, accessible grievance mechanisms, and security risk management measures where relevant. If adverse human rights impacts are expected, an action plan will be prepared identifying applicable national laws and international obligations and setting

out the mitigation measures required to comply with those obligations and with ADB and GCF requirements.

86. In line with the GCF Gender Policy¹³ and Action Plan and in compliance with national laws and/or obligations of the country directly applicable to the activities under relevant international treaties and agreements, screening will also be undertaken for any potential adverse impacts on the promotion, protection, and respect for gender equality. In case of likely impacts, supporting and mitigating actions are to be described and costed in the activity-specific gender action plans and/or ESMPs, as part of the considerations for GCF funding.

Box 1.0 GCF Indigenous Peoples Policy and RPACA Alignment

The GCF Indigenous Peoples Policy recognizes that Indigenous Peoples often have identities and aspirations that are distinct from mainstream groups in national societies and are disadvantaged by traditional models of mitigation, adaptation, and development. In many instances, they are among the most economically marginalized and vulnerable segments of the population. The economic, social, and legal status of Indigenous Peoples frequently limit their capacity to defend their rights to, and interests in, land, territories, and natural and cultural resources, and may restrict their ability to participate in and benefit from development initiatives and climate change actions. In the context of Pacific SIDS, most people are Indigenous peoples of their respective island nations and are best understood as country-specific customary and traditional communities (e.g., iTaukei, Ni-Vanuatu, Kanak), rather than a single regional group. Social identity is closely tied to land, kinship, and customary governance systems, not just ethnicity. As diverse groups of project beneficiaries, they may not share equitable access to project benefits, or benefits are not devised or delivered in a form that is culturally appropriate. Similarly, they may not always adequately be consulted about the design or implementation of activities that would profoundly affect their lives or communities. As such, Indigenous peoples, and safeguards in PSIDS should reflect that diversity and customary governance systems. The GCF Policy and ADB ESF will assist RPACA in incorporating considerations related to Indigenous Peoples into its decision-making while working towards the goals of climate change mitigation and adaptation. The Policies would allow RPACA to anticipate and avoid any adverse impacts its activities may have on Indigenous Peoples' rights, interests, and well-being, and when avoidance is not possible to minimize, mitigate and/or compensate appropriately and equitably for such impacts, in a consistent way and to improve outcomes over time. The RPACA will use the guiding principles of the ADB ESF to develop a project specific IP Plan, if appropriate, following the outline structure shown on page 112 of the ESF and the requirements of the GCF Indigenous Peoples Policy.

87. Screening and assessment of potential impacts on biodiversity¹⁴ are required pursuant to ESS standards of GCF that govern biodiversity conservation and ecosystem services. The activities should avoid impacts on biodiversity and ecosystem services, and if avoidance of impacts is not possible, measures to minimize impacts and compensate and restore biodiversity and ecosystem services will be implemented. For activities that have potential adverse impacts on natural habitats, the preparation of a biodiversity action plan is mandatory. The action plan will describe the long-term mitigation, conservation outcomes, monitoring, and evaluation program. When warranted, the plan will include design and measures that provide remedy or restoration

¹³ GCF.2019. [Gender Policy](#). Seoul.

¹⁴ See Section IV. Guiding Principles. Biodiversity. GCF.2018. [Environmental and Social Policy](#). Seoul.

and compensation, or offsets to mitigate adverse impacts only as a last resort. An outline of the biodiversity action plan is referenced in Linked Document 2 (Section II).

88. When structural elements or components, such as dams, are situated in high-risk locations and their failure or malfunction may threaten the safety of communities, including communities downstream of the dam, the borrower/client will engage qualified and experienced technical and safeguards experts to form a dam safety panel, separating from those responsible for project design and construction, to conduct independent reviews as early as possible in project development and throughout project design, construction, and decommissioning. In such cases, and in addition to local engineering certification requirements, qualified and experienced external experts undertake a risk assessment. In the case of dams and impoundments, experts base their evaluation of safety on specific, project-based risk criteria.

89. A summary of the processes conducted includes, but are not limited to, the following:

1. Infrastructure and Equipment Design and Safety

90. To ensure dam safety and structural integrity, rigorous international standards and methodologies will be applied:

- (i) Design Standards: Structural and hydraulic designs will follow ICOLD, USACE, USBR, ACI, ASCE, and other international guidelines, including seismic design and hydropower integration.
- (ii) Slope Stability and Seepage Analysis: Advanced modeling tools (e.g., Slide2, HEC-RAS) will be used to simulate conditions such as rapid drawdown, steady seepage, and earthquakes. Safety factors will remain above critical thresholds.
- (iii) Dam Break Studies: Breach scenarios and downstream flood impacts will be assessed. Emergency Action Plans (EAPs) will be developed based on inundation mapping.
- (iv) Mechanical Systems: Gates, valves, and hoists will be designed with redundancies and manual overrides. Standards such as ASTM, ISO, JIS, and DIN will be applied.

2. Safety Risks to Affected Communities (Especially Downstream)

91. Comprehensive social safeguard measures are proposed to address risks to local populations:

- (i) Resettlement & Livelihood Restoration: Socioeconomic surveys will inform fair land allocation and compensation.
- (ii) Consultation & Disclosure: Two rounds of inclusive, gender-responsive consultations are planned, in line with Category A project requirements.
- (iii) Grievance Redress Mechanism (GRM): A transparent and accessible GRM will be maintained, with provisions to protect complainants from retaliation.
- (iv) Emergency Preparedness: EAPs will include clear evacuation procedures and hazard communication for downstream communities.

3. Public Exposure to Operational Accidents and Natural Hazards (Including Climate Change)

92. Risk reduction and climate resilience will be embedded in dam planning:

- (i) Climate Vulnerability Assessment: Flooding, precipitation shifts, and extreme weather risks will be modeled to inform adaptive design.

- (ii) Sediment and Watershed Management: Erosion control and sediment flushing will be built into dam operation plans to protect both upstream and downstream ecosystems.
- (iii) Environmental Safeguards: Environmental assessments (EIA, EARF) will be prepared in line with ADB's Environmental and Social Framework, covering biodiversity, water quality, hydrology, and cumulative impacts.

D. Screening under Country Safeguards Systems (CSS)

93. The Pacific Island countries that will participate and receive support under the RPACA includes Cook Islands, Federated States of Micronesia, Fiji, Kiribati, Republic of Marshall Islands, Nauru, Niue, Palau, Papua New Guinea, Samoa, Solomons Islands, Tonga, Tuvalu, and Vanuatu. Their relevant CSS on environmental assessment, land management and administration, labor and working conditions, health and safety management, prevention of SEAH-related incidents including traditions and cultural heritage will be applied to ensure compliance. Across Pacific countries, environmental and social regulatory frameworks are broadly established, with most jurisdictions having formal environmental impact assessment (EIA) systems anchored in national legislation and administered by central environment agencies. Land tenure systems are predominantly customary, with access to land for development typically facilitated through lease arrangements with traditional landowners including legislative requirements. Labour laws are generally in place to govern working conditions, though the depth of occupational health and safety (OHS) provisions varies. SEAH is addressed through a combination of criminal law, family protection legislation, and multi-agency institutional arrangements rather than standalone frameworks. Cultural heritage and traditional practices are strongly protected through constitutions, specific legislation, and dedicated institutions, reflecting the central role of culture and customary governance across the region.

94. Customary land dominance across the Pacific has important implications for safeguards, particularly in ensuring free, prior, and informed consent (FPIC) and culturally appropriate project design. While EIA systems are widely established, enforcement capacity and technical resources vary significantly across countries. There are notable gaps in comprehensive OHS legislation in several jurisdictions, which is particularly relevant for infrastructure and civil works under RPACA. SEAH risks are managed through fragmented systems embedded in broader legal and institutional frameworks, requiring strengthened coordination and implementation. At the same time, strong cultural protection frameworks - rooted in constitutional recognition and land-based governance - underscore the need to integrate traditional knowledge and community structures into RPACA project planning and delivery. All RPACA investments and activities will comply with the required national regulations summarized in Appendix 2. Additionally, the sourcing of materials such as aggregates for all investments under RPACA must comply with ADB's ESF, GCF's ESS Policy as well as country specific requirements.

E. Due Diligence

95. Due diligence can involve desk-reviews, site visits, and/or full-scale impact assessments conducted by qualified staff or consultant(s) depending on the sensitivity and complexity of a project. The screening and risk classification of each investment and activities supporter under RPACA will follow procedures outlined in this framework as per ADB's ESF (2024), GCF's ESP including country specific safeguards requirements.

96. The identification of potential direct, indirect, cumulative, and induced E&S risks and impacts, and a determination of the significance of such impacts, is undertaken by clients early during project preparation and in consultation with stakeholders and affected people. ADB's ESF

(2024) also requires that an assessment is required to identify potential transboundary effects, such as impacts upon international waterways. In such cases, the significance of potential impacts is assessed considering commitments contained in applicable international agreements. The client may be required to consult and notify the affected country or countries about the proposed project.

97. Institutional capacity assessment and capacity development. Prior to approval of each RPACA subproject, ADB will assess the institutional capacity and commitment of the borrower/recipient, executing agency, implementing agency, and any other entity responsible for managing environmental and social risks and impacts. This assessment will form part of ADB's project due diligence, E&S screening, and risk classification process under the ESF 2024. It will consider the agency's legal mandate, organizational structure, staffing, budget, prior safeguards experience, capacity to implement the applicable ESSs, stakeholder engagement and grievance management arrangements, monitoring and reporting systems, and ability to comply with ADB, GCF, and national E&S requirements. Where subprojects involve financial intermediaries, ADB will also assess the FI's environmental and social management system, portfolio screening and risk classification procedures, disclosure and grievance arrangements, E&S staffing, and capacity to monitor and report on underlying activities.

98. Where capacity gaps are identified, ADB and the borrower/client will agree on proportionate capacity development measures, which will be reflected in the ESCP/ESAP, ESMP, project administration manual, financing agreements, or other relevant safeguards and implementation documents. Such measures may include recruitment or designation of qualified E&S specialists, preparation or strengthening of E&S procedures and screening tools, training on ADB ESF and national requirements, support for stakeholder engagement and grievance management, SEAH prevention and response training, technical assistance for preparation and implementation of safeguards instruments, and enhanced monitoring and reporting support. ADB will monitor implementation of these measures throughout preparation and implementation. Where specific capacity actions are required to manage material E&S risks, related subproject activities will not proceed until the agreed actions have been completed in accordance with the ESCP/ESAP.

99. An impact assessment is undertaken if the project is anticipated to have adverse E&S impacts and is developed to be commensurate to the project's potential risks and impacts. The assessment will include an ESMP to address potential impacts and risks that often cover, but not limited to, environmental, social, resettlement, access to land and livelihoods, labor and working conditions, health, and safety, and SEAH-related issues. ESMP proposes tailored mitigation and management solutions and plans.

100. In accordance with the SEAH provisions of the GCF Revised E&S Policy (2021), the following actions will be followed:

- (i) Early identification of any risks or potential adverse impacts on women, men, girls, and boys will be carried out during the screening of GCF-financed activities. These risks will be incorporated into relevant safeguards instruments, such as the ESIA and ESMP, as appropriate. The identification process will consider gender and age differences and will encompass issues such as sexual exploitation, sexual abuse, and sexual harassment. The scope of SEAH assessment in the subsequent phase of the cycle will differ based on risk categorization. An in-depth assessment will be undertaken for projects with risk rating of substantial or high. Outputs of the in-depth assessment may include detailed set of SEAH prevention and mitigation measures as part of the SEAH action plan to be implemented by the project, including standard

- operating procedures for response and case handling; and description of the required capacity and resources to prevent, mitigate and respond to SEAH.
- (ii) The safeguards instruments will include measures to promote gender equality and address, prevent, and eliminate SEAH, or similar terms employed by Accredited Entities that are comparable to those of the GCF. Additionally, all measures to mitigate and manage identified risks and impacts will be implemented, monitored, and continuously improved. Progress and performance in relation to the GCF-financed activities will be monitored and reported to the GCF and stakeholders throughout the implementation process.
 - (iii) In the event of SEAH incidents, the following measures will be in place: (i) established grievance mechanisms that are accessible, inclusive, survivor-centered, and gender-responsive. These mechanisms will have specific procedures to address SEAH, including confidential reporting and safe and ethical documentation of such cases. They will provide clear guidance on when and where to report incidents and outline the follow-up actions that will be taken; (ii) mechanisms to ensure timely services and redress for survivors. This may include medical care, psychosocial support, legal support, community-driven protection measures, and reintegration, as appropriate.

F. Strategic Environmental and Social Assessment

101. A Strategic Environmental and Social Assessment (SESA) is used to evaluate the potential E&S impacts of policies, programs, or plans; especially those implemented at a national or regional level. They are used to assess risks at a program level, and to set the context for, and inform, project-specific ESIAAs.

102. The assessment typically involves analyzing existing conditions, identifying protected areas, identifying vulnerable groups, mapping potential risks, and evaluating how proposed activities might interact with ongoing developments or existing challenges. It also considers cumulative impacts legacy issues, and existing trends that could influence the success or acceptance of future interventions. By doing so, the SESA will support more informed, inclusive, and sustainable planning, and help build stakeholder trust by addressing concerns proactively.

103. Where appropriate, a SESA will be conducted to provide a broad, strategic view, identifying risks and opportunities early in the planning process, which can then help inform the scope and requirements of project ESIAAs. This will help ensure that environmental sustainability and social equity are integrated into decision-making from the outset.

104. A SESA would be used as a high-level overarching document that could inform and guide relevant projects. Other program level safeguard documents, including this ESMF, would be reviewed following completion of a SESA.

G. Impact Assessment and Mitigation Measures

105. This framework establishes a systematic process to identify, assess, and manage potential E&S risks and impacts associated with project activities that will be supported under RPACA. The framework follows the requirements of ADB's ESF and the GCF's ESP, ensuring that environmental and social considerations are integrated into project planning, design, implementation, and monitoring. The impact assessment process aims to prevent adverse impacts where possible, minimize impacts that cannot be avoided, restore affected environments and livelihoods, and offset residual impacts when necessary. Attention is given to vulnerable

groups, biodiversity conservation, occupational and community health and safety, and climate resilience.

H. Impact Identification and Assessment

106. Potential environmental and social impacts will be identified through screening, site-specific assessments, stakeholder consultations, and technical analysis. The level of assessment will depend on the nature, scale, and location of proposed subprojects. Typical environmental and social impacts may include (but not limited to):

- (i) Temporary disturbance to land, soil, and vegetation during construction.
- (ii) Generation of dust, noise, and construction waste.
- (iii) Water pollution risks from runoff, sedimentation, or improper waste disposal.
- (iv) Loss or disturbance of natural habitats or biodiversity.
- (v) Increased use of natural resources such as water and energy.
- (vi) Greenhouse gas emissions from construction and operational activities.
- (vii) Temporary disruption to communities and access routes.
- (viii) Occupational health and safety risks to workers.
- (ix) Community health and safety risks during construction.
- (x) Land acquisition or restrictions on land use.
- (xi) Impacts on livelihoods, especially for vulnerable groups.
- (xii) Risks related to labor conditions, including use of contractors.¹⁵
- (xiii) Gender-related risks, including SEAH and gender-based violence (GBV).
- (xiv) Impacts on Indigenous Peoples, cultural heritage, or traditional practices, where applicable.

107. All impacts will be assessed based on their likelihood, severity, duration, reversibility, and cumulative effects. The assessment will also consider climate-related risks, including exposure to extreme weather and long-term climate variability.

I. Mitigation Hierarchy

108. Mitigation measures will follow the internationally recognized mitigation hierarchy required by ADB ESF and GCF policies:

- (i) **Avoid** impacts where feasible through careful site selection and design.
- (ii) **Minimize** impacts through improved practices and controls.
- (iii) **Restore** affected environments and livelihoods.
- (iv) **Offset or compensate** for residual impacts, where appropriate.

109. This hierarchy ensures that environmental and social risks are managed responsibly and transparently.

¹⁵ For subprojects that involve goods, materials, equipment, or services with potential environmental, social, labor, human rights, or other supply chain risks, ADB will apply appropriate supply chain due diligence requirements commensurate with the nature and scale of the risks. This may include early risk screening and classification, supplier due diligence, labor and human rights attestations, recordkeeping requirements, audit rights, and corrective action or supplier replacement provisions. Where relevant, sector-specific due diligence requirements, including those applicable to solar PV supply chains, will also be incorporated into procurement and contract documentation.

110. **Key mitigation measures.** Mitigation measures will be tailored to each subproject based on identified E&S risks and impacts. The following standard measures provide a general framework.

111. **Environmental and social mitigation measures.** Common environmental mitigation measures may include, but not limited to:

- (i) Implementing erosion and sediment control measures during construction.
- (ii) Limiting vegetation clearing to required areas only.
- (iii) Proper storage, handling, and disposal of construction waste and hazardous materials.
- (iv) Dust suppression through water spraying and controlled material handling.
- (v) Noise reduction through equipment maintenance and restricted working hours.
- (vi) Protection of water bodies through buffer zones and runoff controls.
- (vii) Restoration of disturbed areas through replanting and rehabilitation.
- (viii) Biodiversity protection measures, including avoidance of sensitive habitats.
- (ix) Climate-resilient design and resource-efficient technologies.
- (x) Implementing health and safety management plans for all workers.
- (xi) Providing personal protective equipment (PPE) and safety training.
- (xii) Establishing safe construction zones and community awareness programs.
- (xiii) Maintaining access to homes, businesses, and public services during construction.
- (xiv) Preparing and implementing Land Acquisition Framework and/or Land Acquisition Plan where land acquisition is required.
- (xv) Providing fair compensation and livelihood restoration support.
- (xvi) Implementing Labor Management Procedures (LMPs) and/or Labour Management Plan aligned with national laws and international standards.
- (xvii) Preventing child labor and forced labor.
- (xviii) Establishing measures to prevent SEAH and GBV- related incidents.
- (xix) Supporting inclusion of vulnerable groups and ensuring equitable benefit sharing.
- (xx) Protecting cultural heritage through chance-find procedures

112. Where relevant, Environmental and Social Management Plans (ESMPs) will be prepared to detail specific actions, responsibilities, timelines, and monitoring indicators.

113. **Adaptive management.** The ESMF supports adaptive management, allowing mitigation measures to be updated based on monitoring results, stakeholder feedback, and changing environmental or social conditions. Where new risks or impacts emerge, additional mitigation actions will be introduced to maintain compliance with ADB ESF and GCF requirements.

J. Information Disclosure

114. Relevant information about ESS issues is made available to affected people and other stakeholders including the general public in line with the Public Communications Policy (2011) of ADB.¹⁶ The Policy states that the information will be publicly disclosed in a timely manner and in an accessible place, and in a form and language(s) understandable to the stakeholders so they can provide meaningful inputs into project design and implementation. All disclosure requirements set out in ESS10 and other ESSs are governed by ADB's Access to information Policy¹⁷, including the exceptions to disclosure. The client will agree with ADB on the management of confidential

¹⁶ 2011. ADB. [Public Communications Policy](#). Manila.

¹⁷ 2018. ADB. [Access to Information Policy](#). Manila.

information or personal information especially for project-affected persons, including the timing and content of the disclosure of such information.

115. RPACA will comply with the environmental and social information disclosure requirements of both ADB and GCF. Environmental and social assessments, management plans, and other relevant safeguard instruments will be prepared and disclosed in accordance with the applicable policies, standards, and procedures of each institution. For GCF Category B subprojects, which are generally equivalent to ADB Moderate Risk subprojects, relevant environmental and social assessment documents will be publicly disclosed at least 30 days prior to subproject approval. All disclosures will be undertaken in a timely, accessible, culturally appropriate, and understandable manner, ensuring that affected communities and other stakeholders have sufficient opportunity to review project information and provide feedback through the stakeholder engagement and grievance mechanisms established under the project.

116. For each project under the RPACA program, the following safeguard documents will be submitted by the client to ADB and will be posted on the ADB website (on a project specific page), other websites, and in other locations convenient to affected peoples in both English and a local language(s) understandable to affected person(s):

- (i) For High-Risk projects, a draft ESIA report is disclosed at least 120 days before Board consideration¹⁸.
- (ii) A draft environmental assessment and review framework, a draft ESIA report, a draft Land Acquisition Framework and/or Plan and draft Indigenous Peoples plan and/or plans (including the social impact assessment), the draft Stakeholder Engagement Plan (SEP) and Environmental and Social Commitment Plan (ESCP) or Environmental and Social Action Plan (ESAP) are disclosed prior to project appraisal.
- (iii) The Land Acquisition Framework and/or the Land Acquisition Plan is endorsed by the borrower/client is disclosed after the census of affected persons is completed.
- (iv) A final or updated ESIA, Land Acquisition Plan, updated Stakeholder Engagement Plan and updated Indigenous Peoples plans upon receipt are disclosed.
- (v) Environmental and Social Monitoring Reports on E&S performance in accordance with requirements of the ESCP/ESAP are disclosed.

117. Disclosure periods that will apply are as follows: (i) projects classified as High Risk (under the E&S risk classification) according to the ESMF: no later than one hundred twenty (120) calendar days prior to the relevant ADB Board meeting; (ii) projects classified as Substantial Risk and Moderate Risk, ADB will disclose a draft or a final if available of the E&S assessment and management documents and ESCP/ESAP as early as possible in project preparation and no later than project appraisal or final credit approval; and (iii) where ADB and client agree that certain E&S assessment and management documents will be prepared by the client post-ADB approval of a project, as reflected in the ESCP/ESAP, the disclosure timing will follow the timeframe as set out in the ESCP/ESAP. For High Risk, Substantial, and Moderate Risk Projects, ADB will indicate in a project proposal document for ADB approval, those E&S assessment and management documents that will be prepared and disclosed after ADB approval.

118. The GCF Information Disclosure Policy¹⁹ calls for disclosure of the necessary documentation relevant to ESS and meeting the required disclosure period. The scope of the

¹⁸ From 2026, for projects classified as high risk, ESIA's must be disclosed at least 120 days before Board of Directors consideration of the proposed project for sovereign operations and at least 60 days before Board of Directors consideration of the proposed project for nonsovereign operations.

¹⁹ 2016. GCF. *Information Disclosure Policy*. Seoul.

policy also applies to Category A and Category B projects of GCF-funded programs and investments through medium- to high-level intermediation. Links to the reports outlined above will be communicated to GCF by RPACA for posting on the GCF website and disclosure to the GCF Board and Active Observers in line with the above-cited GCF policy.

119. In line with GCF's Revised E&S Policy (2021), the "disclosure of information, meaningful consultation, and informed participation will be designed and undertaken in a manner that is gender-sensitive, inclusive and participatory, and takes into consideration the risks and impacts, including where appropriate transboundary impacts as well as opportunities to enhance E&S outcomes of the proposed activities, starting from the design and development of activities and will continue throughout the lifecycle of the activities."

K. Consultation and Participation

120. The application of the ADB ESF and ESS10 specifically requires clients to engage with stakeholders throughout the concept design, preparation, and implementation phases of a project cycle. Stakeholder engagement requires (i) stakeholder identification and analysis, (ii) stakeholder engagement planning and implementation (iii) information disclosure, (iv) meaningful consultations, (v) monitoring and reporting, and (vi) addressing and responding to concerns and grievances. The client is required to pay particular attention to and prioritize project-affected persons with emphasis on those who are deemed disadvantaged or vulnerable, or who may face systemic barriers to stakeholder engagement based on discrimination or social exclusion, and who may need different or separate forms of engagement. The GCF IPP policy aligns with ADB's ESF through meaningful consultation that: (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

121. Where specific subprojects or components of a project to be financed by under RPACA are not yet identified, or where specific locations or alignments of major infrastructure or project facilities are uncertain at the time of ADB's project appraisal or final credit approval, the client may develop a stakeholder engagement framework which will establish; (i) the general principles, (ii) a strategy to identify stakeholders, and (iii) a strategy for meaningful engagement in accordance with ESS10. Once the information becomes available, and before the client can proceed with such subprojects or components, an SEP will be developed in accordance with the stakeholder engagement framework and ESS10.

122. ADB will participate in consultation activities led or organized by the client to understand the concerns of project-affected persons, and how such concerns will be addressed by a client in project design and mitigation measures in accordance with ESS10. The frequency of ADB participation will be determined at the scoping stage and will be proportionate to the nature and scale of project's E&S risks and impacts; see Box 1.0 for information on alignment with GCF IPP policy.

123. Accredited entities in an intermediary role will guarantee that executing entities meet the stakeholder engagement requirements at the activity level. This is essential to ensure widespread support and participation from various stakeholders throughout the lifespan of GCF-financed

activities. Moreover, accredited entities must conduct thorough due diligence and oversight to ensure that E&S risks and impacts are adequately addressed. In summary, accredited entities will facilitate stakeholder engagement, mitigate risks, and monitor impacts, while also verifying compliance with the specified requirements.

124. RPACA will assess whether consultations conducted through National Designated Authorities (NDAs), government agencies, and other national institutions have adequately engaged the legitimate representatives of affected Indigenous Peoples and meet the requirements for meaningful consultation. Where necessary, additional consultations will be undertaken with customary authorities and community-recognized representative institutions. All consultations will be culturally appropriate, inclusive, and gender-responsive, with records maintained on participants, issues raised, feedback received, and how feedback informed project design and implementation.

125. In compliance with the Revised E&S Policy of GCF on information disclosure, stakeholder engagement, and grievance redress, RPACA will ensure the effective engagement of communities and individuals that are affected or potentially affected by the activities proposed for GCF funding. The operational details of disclosure of information, meaningful consultation, and informed participation in a culturally appropriate and gender responsive manner, and, in certain circumstances, free, prior informed consent will be included in a stakeholder engagement plan²⁰ (SEP) that will be required for all RPACA projects. The SEP will describe the disclosure of information, meaningful consultations, and informed participation in a culturally appropriate and gender responsive manner, and, in certain circumstances, free, prior informed consent, as required pursuant to the ESS standards of GCF and will be supported by the disclosure of relevant information pursuant to the GCF Information Disclosure Policy. An indicative outline of a SEP is referenced as Linked Document 2 (Section IV).

L. Compliance Monitoring and Reporting

126. ADB integrates project level development effectiveness, as well as the monitoring and supervision of ESS, into its project performance management system. ADB and RPACA clients that include sovereign borrowers and/or recipients which are ADB DMCs, have the responsibility for implementing E&S measures and relevant management plans outlined in the legal agreements. They are also responsible for submitting periodic monitoring reports to ensure compliance with E&S requirements and assess performance. ADB will oversee the preparation and submission of an annual E&S monitoring report by the implementing entities (as outlined in Section IX of Linked Document 2).

127. Depending on the structure of the project, project level agreements will mandate the ESS implementation and monitoring responsibilities of the borrowers/recipients. RPACA will work with borrowers/ recipients to rectify to the extent possible any failures to comply with their E&S commitments and exercise remedies to reestablish compliance as appropriate and as required and monitor the fulfillment of obligations in the event of non-compliance including submission of corrective action plan, among others.

128. Additionally, ADB will review and assess the performance of sovereign recipients in addressing ESSs issues. Available country safeguard systems assessments undertaken by ADB will be reviewed and assessed including efforts to facilitate alignment with ADB and best international practice to: (i) ascertain organizational capacity for E&S management; and (ii)

²⁰ See Guiding Principles. GCF. 2018. [Environmental and Social Policy](#). Seoul.

determine required interventions in parallel with RPACA support for strengthening policies and regulatory frameworks including support for strengthening national and local institutions.

129. Consistent with GCF Revised E&S Policy, ADB as AE will undertake all necessary measures to ensure that activities are implemented in a manner that ensures that: the ESMP (Section X of Linked Document 2) and all measures to mitigate and manage E&S risks and impacts, and to improve outcomes, are implemented, monitored and continuously improved; and progress and performance are monitored and reported to GCF and its stakeholders throughout the implementation of the GCF-financed activities, in accordance with the monitoring and accountability framework and allowing GCF or GCF-authorized third-party verification of such reports.

130. The activities²¹ outlined below are required to be undertaken by the RPACA clients:

- (i) To apply and implement the ten (10) ESSs, proportionate to the nature and scale of a project's E&S performance.
- (ii) To conduct E&S assessment in accordance with ESS1 and to prepare and implement a project so that it meets the requirements of the ESSs applicable to the project.
- (iii) To implement all measures and actions set out in the ESCP/ESAP and conduct monitoring and reporting on the E&S performance of a project against all relevant ESSs as set out in the ESCP/ESAP.
- (iv) Where requirements of the host country's applicable laws differ from ESS requirements, ADB will require a client to achieve or implement whichever is more stringent or protective for project-affected persons and/or the environment. The client will apply the requirements of the relevant good international practice (GIP) and other internally recognized standards such as the World Bank Group's Environmental Health and Safety Guidelines (EHSGs), as required under the relevant ESSs.
- (v) Where the client proposes less stringent standards than those provided in applicable GIP or EHSGs, as required under the relevant ESSs, the client will provide a detailed assessment and justification for the proposed less stringent standards.
- (vi) **Associated facilities.** Where ADB determines that the requirements of the common approach or the requirements of other multilateral or bilateral agencies or organizations are likely to address the E&S risks and impacts of the associated facilities to achieve E&S outcomes through meeting the objectives materially consistent with the ESSs, the client will demonstrate the extent to which it cannot exercise control or influence over the associated facilities, providing details of the considerations for such a determination. When a new facility or activity that is related to the project does not meet the conditions prescribed for associated facilities under para 16 of the Environmental and Social Policy (ESP), the client will undertake a high-level E&S risk assessment of such a new facility or activity to the extent possible based on the information available to the client at the time of project preparation, documenting the scope of potential issues and future management issues to be determined.
- (vii) **Existing facilities.** For a project that includes existing facilities or activities as a component, the client will apply requirements set out in ESS1.
- (viii) **Common approach.** Where ADB is cofinancing a project with other multilateral or bilateral agencies or organizations, and where appropriate, the client will agree on a common approach in the E&S assessment, development, and implementation of a project. Where ADB is financing a project for which certain E&S assessments have already been undertaken and E&S assessments and management documents have

²¹ See Environmental and Social Policy. ADB. 2024. [Environmental and Social Framework](#). Manila.

been prepared as required under the common approach, ADB may agree with the client to rely on such E&S assessments and management documents prepared using the agreed common approach. Where ADB is requested to provide financing for a project that is under construction, or where a project has already received national permits or licenses or other forms of clearance for construction or operations, including the approval of local E&S impact assessments, other otherwise completed or partially completed E&S assessments prior to ADB's involvement in a project, ADB will include a client's E&S audit which is required under ESS1 for existing facilities or activities.

- (ix) **ESCP/ESAP.** If ADB concludes that the client has inadequate technical capacity to carry out the E&S assessment process, the client will include in the ESCP/ESAP a description of training to address the specific measures and actions required to support effective and continuous E&S performance. The client will specify a completion date for each action in the ESCP/ESAP, to implement the measures and actions identified in the ESCP/ESAP in accordance with the specified timeframe and to review the status of the implementation of the ESCP/ESAP as part of its monitoring and reporting. The client will confirm to ADB its high-level commitment to providing the necessary human and financial resources on an ongoing basis to effectively implement the ESCP/ESAP. This includes ensuring adequate resources for monitoring, reporting, and fulfilling all ESCP/ESAP requirements throughout the project. Where the client is required under the ESCP/ESAP to take specific measures and actions during project implementation, the client will commit to not carrying out activities in relation to a project that may cause material adverse risks and impacts, until the relevant measures and actions have been completed in accordance with the ESCP/ESAP, including satisfying applicable requirements on consultation and disclosure. If there are changes to a project that result in additional E&S risks and impacts, particularly where these will impact project-affected persons, the client will provide information on such risk and impacts and will undertake meaningful consultation with project-affected persons in accordance with ESS10.
- (x) **Client's environmental social systems.** Where the use of the client's E&S systems is approved by ADB, the client will take all actions necessary to maintain the E&S system, as well as acceptable implementation practices, track record, and capacity, in accordance with the measures and actions identified in the ESCP/ESAP, throughout the implementation phase of a project cycle. If in the opinion of ADB, that such change is inconsistent with paragraph 45 of the ESP and the ESCP/ESAP, the client will carry out, as appropriate additional assessments and stakeholder engagement in accordance with ESSs and agree on changes to the ESCP/ESAP. If, in the opinion of ADB, such changes serve to further improve the client's E&S systems, the client will apply such changes to a project, after reflecting the new requirements in ESCP/ESAP.
- (xi) **Information disclosure.** The clients will disclose sufficient, relevant, and timely information on the potential E&S risks and impacts of a project to stakeholders in accordance with ESS10. The clients will provide ADB with the E&S assessments and management documents in a timely manner to allow ADB to disclose them on its website.
- (xii) **Consultation and participation.** The clients will commence stakeholder engagement as early as possible in the project cycle and in a timeframe that enables meaningful consultations with stakeholders on project design and will continue throughout the preparation and implementation phases of the project cycle as set out in a stakeholder engagement plan (SEP). The SEP will require the clients to identify project-affected persons that may be disproportionately affected by a project because

of their disadvantaged or vulnerable status. Where disadvantaged or vulnerable persons are identified, the clients will undertake assessments of the risks and impacts to such persons and identify and implement differentiated measures to mitigate the adverse impacts so that the project adverse risks do not fall disproportionately on them. Where Indigenous Peoples are present in, or have a collective attachment to, a proposed project-affected area, the clients will undertake a process of meaningful consultation tailored to Indigenous Peoples in accordance with ESS7 and to document the outcome of the meaningful consultation, which will contribute to ADB's decision making as to whether to proceed with a proposed project or not. The clients will obtain the free, prior, and informed consent (FPIC) of project-affected Indigenous Peoples when the circumstances described in ESS7 are present.

- (xiii) **Monitoring.** For High Risk and Substantial Risk projects, and/or where appropriate and as required under the ESSs, the clients will engage stakeholders and third-parties, such as external specialist, local communities, or civil society organizations, to complement or verify project monitoring information, and include such requirements in a project ESCP/ESAP. Where third-parties are responsible for managing specific E&S risks and impacts and associated implementing mitigation measures, the clients will collaborate with such agencies and third-parties to establish and monitor such mitigation measures and to achieve satisfactory implementation. Where ADB has identified and agreed with the clients and, as relevant, other agencies, on corrective or preventative measures and actions, such measures and actions will be included in the ESCP/ESAP. If the client fails to implement measures and actions in the ESCP/ESAP in the timeframes specified, the clients will rectify such failure as covenanted in a project's legal agreement, and/or otherwise exercise its legal remedies that are available under the project's legal agreement. ADB will determine whether further measures and actions by the clients, including continuing ADB's monitoring support will be required.
- (xiv) **Grievance mechanism and accountability.** The clients will provide a project-level mechanism to receive and facilitate resolutions of concerns and grievances of project-affected persons arising in connection with a project.

131. E&S performance will be evaluated against the clients' commitments as agreed in the legal documents, ESIA and ESMP, and vis-à-vis applicable ESS requirements, on an annual basis until a project completion report is issued. Based on the review of the annual monitoring reports for High Risk, Substantial Risk and Moderate Risk projects prepared by the clients, ADB will prepare an annual E&S performance report substantially in the form set out in Section IX (of Linked Document 2) and submit it to ADB.

132. In parallel, ADB will undertake the following E&S compliance monitoring and reporting activities:

- (i) monitor the client's E&S performance in accordance with the requirements in ESCP/ESAP. This includes reviewing monitoring reports submitted on the compliance of a project with the requirements of the ESCP/ESAP.
- (ii) conduct periodic site visits for projects with adverse E&S risks and impacts.
- (iii) conduct supervision missions with detailed review by ADB's safeguard specialists/officers or consultants for projects with significant adverse E&S risks and impacts.
- (iv) review the periodic monitoring reports submitted by clients to ensure that adverse impacts and risks are mitigated as planned and as agreed with ADB.

- (v) work with clients to rectify to the extent possible failures to comply with their E&S commitments, as covenanted in the legal agreements or the ESCP/ESAP, and exercise remedies to reestablish compliance as appropriate; and
- (vi) prepare a project completion report that assesses whether the objective and desired outcomes of the E&S management plans have been achieved, considering the baseline conditions and the results of monitoring.

133. GCF reporting requirements at the program level include submission of annual performance reports (APRs), interim evaluation, and final evaluation reports.²² The APRs that ADB/RPACA will submit to GCF will be focused on the implementation of the ESMF, ESMPs and E&S performance of the investment portfolio based on the project level monitoring to be conducted by ADB project teams. Benchmark E&S compliance includes consistency with the ESS standards and the monitoring and accountability framework of GCF.

M. Grievance Management

134. A grievance mechanism (GM)²³ will be established by RPACA and ADB clients to receive and facilitate resolution of affected people's concerns and grievances about the client's social and environmental performance at project level. Linked Document 2 (Section III) presents the guide to the project-level GM. The mechanism in place should be able to address affected people's concerns and complaints including SEAH, promptly, by using an understandable and transparent process that is gender responsive, culturally appropriate, and readily accessible to all segments of the affected people. AE is responsible for incorporating and monitoring SEAH prevention, mitigation, and response measures in ADB-financed projects (as discussed in Section V.B of this report). The GM in place may serve as one of the avenues for addressing SEAH-related complaints under the program. Additionally, a separate grievance mechanism needs to be developed and established separately for project workers under ESS2. This workers' grievance mechanism will not impede project workers' access to grievance mechanism under ESS10.

135. The Management-Led Grievance Redress Service (MGRS) is ADB's centralized mechanism for receiving and facilitating the resolution of environmental and social concerns and grievances related to subprojects under RPACA. Any individual, community, or organization that is, or may be adversely affected by any of the subprojects under RPACA may submit a grievance to the MGRS. Grievance may also be submitted through an authorized representative on behalf of the affecter persons or communities. Information on the MGRS, including how to submit a grievance, will be disclosed to affected persons and communities through the relevant executing and implementing agencies as part of stakeholder engagement and project information disclosure activities.

136. Towards this end, RPACA will undertake all necessary measures to ensure that the GM in place address SEAH- related incidents in addition to the E&S impacts of activities. Within the scope of its mandate, RPACA as AE will support and work in partnership with the client and assess needs to deliver SEAH-focused due diligence process, monitor its implementation, and put in place provisions for the appropriate setup and oversight of response mechanisms.

²² See General requirements for E&S risk management, Section 6.8 on Monitoring, and reporting. GCF. 2018. [Environmental and Social Policy](#). Seoul.

²³ As stipulated in ESF- ESS10 on Stakeholder Engagement and Information Disclosure. ADB. 2024. [Environmental and Social Framework](#). Manila

137. GCF mandates that accredited entities, which act as intermediaries, will be responsible for ensuring that their clients or executing entities meet the requirements of the activity-level grievance mechanism. Moreover, these intermediaries must conduct thorough due diligence and oversight to verify compliance with these requirements. The requirements stipulate the need for establishing and maintaining suitable and efficient mechanisms to receive complaints and facilitate their resolution in relation to activities financed by GCF. To address complaints specific to the SEAH issue, a survivor-centered and gender-responsive grievance redress mechanism will be implemented with guidance from GCF. GCF has also established other formal channels for seeking grievance redress, including the utilization of the GCF Independent Redress Mechanism.²⁴

138. As called for in GCF's Revised E&S Policy and in case of incidences of SEAH occur (para. 19 (b) and para. 20), RPACA ESIA will ensure that there are: (i) established accessible and inclusive survivor-centered and gender-responsive grievance redress mechanisms in place, with specific procedures for SEAH including confidential reporting with safe and ethical documenting of such cases, that indicate when and where to report incidents, and what follow-up actions will be undertaken; and (ii) modalities to provide timely services and redress to survivors, including as appropriate, medical care, psychosocial support, legal support, community driven protection measures, and reintegration.

139. In accordance with GCF's Indigenous Peoples Policy (2018), and the requirements of the ESF, RPACA will ensure that activities are developed and implemented in a manner that fully respects, promotes, and safeguards the rights and well-being of IP, ensuring that (i) they benefit from GCF activities and projects in culturally appropriate ways, and (ii) are protected from any harm or adverse impacts arising from the design and implementation of GCF-financed initiatives. The grievance mechanism will be developed in a manner which is accessible and appropriate to IP.

N. Accountability Mechanism

140. ADB's Accountability Mechanism (AM), established under the AM Policy 2012, serves as an independent platform for individuals who have been negatively impacted by ADB-assisted projects²⁵. This mechanism allows them to voice their concerns, seek remedies for their problems, and report any suspected violations of ADB's operational policies and procedures. ADB considers an effective AM as crucial for addressing the grievances of those affected by its projects and ensuring compliance with its operational policies and procedures. Furthermore, ADB acknowledges that achieving development goals necessitates upholding principles such as accountability, transparency, openness, and public participation at a high standard.

141. ADB's AM provides an independent and effective forum for those affected by ADB-assisted projects. The core and strength of the AM is the continuum of problem prevention, problem solving, and compliance of which framework consists of: (i) project-level grievance mechanism; (ii) ADB operations departments' problem solving and compliance efforts and actions; (iii) problem solving led by the Office of the Special Facilitator (OSF); and (iv) Compliance Review Panel's (CRP) compliance review. It may be mentioned that SEAH- related incidents are applicable and are considered under the AM.

²⁴ See Section 7.3 Grievance redress mechanisms. GCF.2018. [Environmental and Social Policy](#). Seoul.

²⁵ ADB. 2012. [Accountability Mechanism Policy 2012](#). Manila.

142. Items (iii) and (iv) above comprise the two distinct offices of the AM. The OSF helps various parties, particularly those affected by projects, in finding solutions to their problems while the CRP is responsible for investigating alleged violations of the ADB's operational policies and procedures, as defined by the Board of Directors. These violations include ESF that have caused or are likely to cause direct adverse and significant harm to people affected by the projects. The CRP also provides recommendations on ensuring project compliance with the policies and procedures. Both offices collaborate in conducting outreach activities to increase awareness and understanding of the mechanism, both internally within the ADB and externally.

143. RPACA as AE will support providing awareness of accountability mechanisms options by integrating this into, e.g., E&S training, fact-finding missions before project approval and subsequently during project launch, outreach training programs and online modules for affected people and civil society organizations. The program will align with the full accountability continuum by supporting proactive risk management, strengthening ADB operational oversight, and facilitating problem-solving processes where issues arise, including those related to environmental, social, and SEAH risks. Subprojects will establish accessible and culturally appropriate project-level grievance redress mechanisms across Pacific countries, enabling affected communities - including those in remote and customary land settings - to raise concerns early and seek timely resolution.

VI. IMPLEMENTATION ARRANGEMENTS

144. As the RPACA adopts a regional approach, ADB will act as the GCF AE for the current funding proposal of the program. Two regional organizations, which are also AEs, the Pacific Community (SPC) and the Secretariat of the Pacific Regional Environment Programme (SPREP) will serve as hosts and implement leads based on their respective components as they are developed and submitted to the GCF. Specifically, ADB will lead the delivery of Components 1 and 2, SPC will lead Component 3, and SPREP will lead Component 4. Coordination across all components will be managed through a High-Level Regional Steering Committee, which includes the Advisory Group and the Regional Partnerships of Accredited Entities. The High-level Steering will ensure alignment and coordination among the three proposals, supporting cohesive governance and effective regional implementation. Each entity will manage specific program components based on their expertise, capacity, and regional roles. The governance framework will establish clear guidance for decision-making, including processes for approval project proposals, budget allocations, and strategic adjustments. The AEs will have legal responsibility for implementation, monitoring, and decision-making in line with their Accreditation Master Agreement.

145. For ESS compliance, ADB will undertake activities with risks and impacts classified as High. SPREP and SPC will conduct activities classified as Substantial Risks, Moderate Risks and Low Risks. No High-Risk activities will be undertaken by SPREP or SPC.

146. Specifically, for ADB components and at the subproject level, the teams from ADB's operations department will have primary responsibility for ensuring that both public and private sector transactions meet the ADB ESF requirements. The RPACA Manager will verify that ADB has conducted the necessary E&S reviews, ensure ongoing compliance monitoring and reporting, and confirming that the project aligns with the relevant ESF policies of both ADB and GCF, including the GCF IP Policy, as outlined in this RPACA ESMF. Training will be provided to clients and project developers as needed for projects, as part of the broader ADB ESF (2024) initiative aimed at strengthening country systems.

147. For each subproject, ADB will form a “OneADB Team” comprising various staff including environmental and social safeguards specialists. ADB team regularly monitors project compliance with E&S documents. ADB will monitor a client’s E&S performance in accordance with the requirements in ESCP/ESAP. This includes reviewing monitoring reports submitted by clients on the compliance of a project with the requirements of ESCP/ESAP. The extent and mode of ADB’s monitoring with respect to E&S performance will be proportionate to the potential E&S risks and impacts of a project. For High Risk and Substantial Risk projects, and/or where appropriate and as required under the ESSs, ADB will require a client to engage stakeholders and third parties, such as external specialists, local communities, or civil society organizations, to complement or verify project monitoring information, and include such requirement in a project’s ESCP/ESAP. The executing and implementing agencies are required to submit E&S monitoring reports. The reports are required to identify any non-compliance and report remedy measures taken. In addition, environmental and social safeguards compliance will also be included in the quarterly progress reports to be submitted to ADB by the executing agencies.

A. Roles and Responsibilities

148. To ensure robust E&S standards are applied across its portfolio, ADB maintains a strong internal capacity of various E&S specialists. These professionals are engaged early in the project cycle, particularly during the early assessment and risk classification of the project’s risk profile (e.g., High Risk classification for projects with significant risks and impacts).

149. Based on this early assessment, which is often supported by external consultants, ADB evaluates whether the implementing agency has the necessary experience and expertise to sufficiently manage E&S risks and impacts. If a skills gap is identified, ADB can mandate the inclusion of dedicated international and/or national E&S personnel, either full-time or part-time, within each project team. This requirement is grounded in ADB’s ESF (2024) which provides a structured yet flexible framework for ensuring that each project is staffed appropriately according to its complexity and risks.

150. At the subproject implementation stage, ADB also requires project sponsors to demonstrate their own E&S competency. During the fact finding and early assessment stages of the project, ADB and the client agree on the level of E&S staffing needed for the implementation phase. The establishment of a project management team ensures responsibilities for day-to-day implementation, including E&S compliance, which are clearly assigned, understood, and applied at the project level. Construction Supervision Consultants (CSCs) are tasked with overseeing contractor sub-plans and on-the-ground compliance which are scaled to match the size and complexity of any given project. Often for high-risk projects independent project monitors and other technical staff are appointed. ADB typically receives semi-annual environmental and social monitoring reports, which inform decisions on whether a project is progressing satisfactorily, requires corrective action, or under exceptional circumstances, should be suspended. This structured oversight ensures that both ADB and its partners uphold high standards of E&S responsibility throughout the project lifecycle.

151. Contractor environmental and social requirements. For RPACA subprojects involving civil works, goods, or services with environmental and social risks, the borrower/client will ensure that relevant E&S requirements are incorporated into procurement documents, technical specifications, contract conditions, and supervision arrangements. Contractors will be required to prepare, submit for approval, and implement a contractor Environmental and Social Management Plan (C-ESMP), or site-specific ESMP, consistent with the subproject ESMP, ESCP/ESAP,

applicable safeguards instruments, ADB ESF requirements, national laws, and good international practice. The C-ESMP will set out site-specific management measures, roles, and responsibilities, monitoring indicators, reporting arrangements, and emergency procedures. It will address, as applicable, occupational and community health and safety, traffic and access management, labor and working conditions, worker accommodation, worker grievance mechanisms, pollution prevention, waste and hazardous materials management, biodiversity protection, chance finds, stakeholder communication, SEAH prevention and response, incident notification, and corrective action procedures.

152. Contractor performance will be supervised by the borrower/client, project implementation unit, construction supervision consultant, and ADB through regular document review, site inspections, progress meetings, review of monitoring reports, and verification of corrective actions. Contractors will be required to report E&S performance periodically and to notify the borrower/client promptly of any significant incidents, accidents, grievances, SEAH allegations, non-compliance, or unanticipated impacts. Contractor E&S performance will be evaluated against the approved C-ESMP, contract conditions, ESMP, ESCP/ESAP, and applicable ESS requirements. Where non-compliance is identified, the contractor will be required to prepare and implement corrective actions within agreed timeframes. Serious, repeated, or unresolved non-compliance may result in contractual remedies, including written warnings, withholding of payments where provided under the contract, suspension of works, replacement of non-performing personnel or subcontractors, exclusion of non-compliant suppliers or subcontractors, and termination of contract where warranted. These requirements will be applied proportionate to subproject risk and monitored throughout implementation.

Appendix 1 – ADB Environmental and Social Risk Classification Form

Environmental & Social Overview

Overview of Environmental and Social Project Settings ⓘ Enter text.
<i>Overview of Borrower's Institutional Capacity for Managing Environmental and Social Risks and Impacts</i> ⓘ Enter text.
OSPT Comments ⓘ Enter text.
OSPT Director Comments ⓘ Enter text.

Common Approach and Actions

<i>Is Common approach being considered:</i> Choose an item. If Yes, Enter Comments ⓘ Enter text. If Yes, Selected Partner and MDBs ☐ International Finance Corporation (IFC) ☐ World Bank (WB) ☐ European Bank for Reconstruction and Development (EBRD) ☐ Asian Infrastructure Investment Bank (AIIB) ☐ Others Enter Description for Others (Partner and MDBs) ⓘ Enter text.
<i>Proposed Measures, Actions, and Timings (Client/Borrower's Commitment)</i> Any actions to be considered for the ESCP/ESAP? Choose an item. Actions to be considered prior to appraisal / Comments ⓘ Enter text. Full Mutual Reliance Framework ⓘ Enter text. OSPT Comments ⓘ Enter text. OSPT Director Comments ⓘ Enter text.

Environmental and Social Risk Classification Checklist and Relevance

ESS-1: Assessment and Management of Environmental and Social Risks and Impacts				
ESS1 Relevance		Choose an item.		
ESS1 Summary Risk Level		Risk	ESS1 Summary Project Team Comments i	ESS1 Summary OSPT Team Comments i
Summary Risk Level		Choose an item.	Enter text.	Enter text.
ID	ESS1 Risk Screening Questions	Response	ESS1 Risk Project Team Comments i	ESS1 Risk OSPT Team Comments i
1	Is there a risk that the project may affect disadvantaged or vulnerable persons or groups?	Choose an item.	Enter text.	Enter text.
2	Is there a risk of cybersecurity breaches, data privacy violations, or poor data management associated with the use of digital technology in the project?	Choose an item.	Enter text.	Enter text.
3	Is there a risk that the project may lead to income or livelihood losses due to environmental impacts not directly linked to land acquisition or land use restrictions?	Choose an item.	Enter text.	Enter text.
4	Is there a risk that the borrower/client lacks sufficient human or financial capacity to effectively screen, assess, manage, and monitor environmental and social risks and impacts in line with ESS1?	Choose an item.	Enter text.	Enter text.

ESS-2: Labor and Working Conditions				
ESS2 Relevance		Choose an item.		
ESS2 Summary Risk Level		Risk	ESS2 Summary Project Team Comments i	ESS2 Summary OSPT Director Comments i
Summary Risk Level		Choose an item.	Enter text.	Enter text.
ID	ESS2 Risk Screening Questions	Response	ESS2 Risk Project Team Comments i	ESS2 Risk OSPT Team Comments i
1	Is there a risk that the project may involve or contribute to child labor?	Choose an item.	Enter text.	Enter text.
2	Is there a risk that the project may involve or contribute to forced labor?	Choose an item.	Enter text.	Enter text.
3	Is there a risk of discrimination, violence, harassment, retaliation, or sexual exploitation, abuse, and harassment against project workers?	Choose an item.	Enter text.	Enter text.
4	Is there a risk that the project may not meet ESS2 requirements on freedom of association and collective bargaining?	Choose an item.	Enter text.	Enter text.

5	Is there a risk associated with poor working conditions, unclear terms of employment, or limited worker awareness of their rights and entitlements?	Choose an item.	Enter text.	Enter text.
6	Is there a risk of labor-related issues in the project's supply chain, as defined under ESS2?	Choose an item.	Enter text.	Enter text.
7	Is there a risk that the project will fail to establish or enhance an effective grievance mechanism for project workers?	Choose an item.	Enter text.	Enter text.
8	Is there a risk associated with the adequacy, safety, or management of worker accommodation provided under the project?	Choose an item.	Enter text.	Enter text.
9	Is there a risk associated with workforce reduction or collective dismissal, including lack of due process or mitigation measures?	Choose an item.	Enter text.	Enter text.
10	Is there a risk associated with disadvantaged and vulnerable project workers, including migrant, informal workforce, and community workers?	Choose an item.	Enter text.	Enter text.

ESS-3: Resource Conservation and Pollution Prevention				
ESS3 Relevance		Choose an item.		
ESS3 Summary Risk Level		Risk	ESS3 Summary Project Team Comments ⓘ	ESS3 Summary OSPT Team Comments ⓘ
Summary Risk Level		Choose an item.	Enter text.	Enter text.
ID	ESS3 Risk Screening Questions	Response	ESS3 Risk Project Team Comments ⓘ	ESS3 Risk OSPT Team Comments ⓘ
1	Is there a risk that the project may result in unsustainable use of energy, water, soil, or other raw materials?	Choose an item.	Enter text.	Enter text.
2	Is there a risk that the project's emissions, discharges, noise, or activities may cause pollution or nuisance impacts to air, water, soil, surrounding communities, or sensitive receptors?	Choose an item.	Enter text.	Enter text.
3	Is there a risk that the project's supply chain may involve significant resource use or pollution risks, such as sourcing raw materials from poorly regulated or high-impact sectors?	Choose an item.	Enter text.	Enter text.
4	Is there a risk that the project may generate hazardous or non-hazardous waste, or involve the use, storage, transport, or production of hazardous chemicals, substances, or materials that could pose risks to human health or the environment if not properly assessed and managed?	Choose an item.	Enter text.	Enter text.
5	Is there a risk of pre-existing contamination (legacy pollution) on the project site that could pose risks to human health or the environment if not properly assessed and managed?	Choose an item.	Enter text.	Enter text.

6	Is there a risk that the project may create temporary or permanent breeding habitats for mosquitoes, rodents, or other disease vectors?	Choose an item.	Enter text.	Enter text.
7	Is there a risk that the project may require the procurement, use, storage, handling, application, or disposal of pesticides that could pose risks to human health, biodiversity, or the environment if not properly managed?	Choose an item.	Enter text.	Enter text.
8	Is there a risk that the host country lacks adequate legal and institutional frameworks or integrated management systems for hazardous chemicals, substances, and materials, including alignment with Good International Practice?	Choose an item.	Enter text.	Enter text.

ESS-4: Health, Safety, and Security				
ESS4 Relevance		Choose an item.		
ESS4 Summary Risk Level		Risk	ESS4 Summary Project Team Comments ①	ESS4 Summary OSPT Team Comments ①
ESS4 Summary Risk Level		Choose an item.	Enter text.	Enter text.
ID	ESS4 Risk Screening Questions	Response	ESS4 Risk Project Team Comments ①	ESS4 Risk OSPT Team Comments ①
1	Is there a risk that the project may result in adverse health impacts to project workers or project-affected persons?	Choose an item.	Enter text.	Enter text.
2	Is there a risk that the project may result in safety hazards or incidents affecting project workers or project-affected persons?	Choose an item.	Enter text.	Enter text.
3	Is there a risk that the project may expose project workers or project-affected persons to security threats or risks?	Choose an item.	Enter text.	Enter text.
4	Is there a risk that the project may result in sexual exploitation, abuse, or harassment?	Choose an item.	Enter text.	Enter text.
5	Is there a risk of geophysical or physical climate-related impacts, or impacts on ecosystem services, resulting from the project?	Choose an item.	Enter text.	Enter text.
6	Is there a risk to product safety arising from the project's involvement in the production or trade of consumer products, including related storage, handling, and transportation?	Choose an item.	Enter text.	Enter text.

ESS-5: Land Acquisition and Land Use Restriction				
ESS5 Relevance		Choose an item.		
ESS5 Summary Risk Level		Risk	ESS5 Summary Project Team Comments ①	ESS5 Summary OSPT Director Comments ①
ESS5 Summary Risk Level		Choose an item.	Enter text.	Enter text.
ID	ESS5 Risk Screening Questions	Response	ESS5 Risk Project Team Comments ①	ESS5 Risk OSPT Team Comments ①

1	Is there a risk that the project may result in significant economic or physical displacement due to past, present, or future impacts (excluding voluntary LA/LUR), such as loss of productive or income-generating assets, or physical relocation?	Choose an item.	Enter text.	Enter text.
2	Is there a risk that the project may result in forced eviction in connection with any type of LA/LUR activities?	Choose an item.	Enter text.	Enter text.
3	Is there a risk that project-related displacement may lead to significant livelihood losses requiring substantial restoration measures, including potential loss of access to community facilities, utilities, public amenities, or services?	Choose an item.	Enter text.	Enter text.
4	Is there a risk that LA/LUR activities - whether voluntary or involuntary - may disproportionately affect disadvantaged or vulnerable project-affected persons?	Choose an item.	Enter text.	Enter text.
5	Is there a risk that poor land tenure systems or lack of legal recognition may exclude or disadvantage persons without formal rights to land or assets, such as informal land users, encroachers, or Indigenous Peoples without recognized claims?	Choose an item.	Enter text.	Enter text.
6	Is there a risk that the borrower/client may lack adequate capacity, time, or resources to assess and manage LA/LUR risks and impacts effectively, whether voluntary or involuntary?	Choose an item.	Enter text.	Enter text.
7	Is there a risk that the project's voluntary LA/LUR processes may be mismanaged or may fail to meet applicable voluntary LA/LUR requirements?	Choose an item.	Enter text.	Enter text.
8	Is there a risk that significant past land acquisition associated with the project may present substantial challenges for mitigation or compliance?	Choose an item.	Enter text.	Enter text.

ESS-6: Biodiversity Conservation and Sustainable Natural Resources Management				
ESS6 Relevance		Choose an item.		
ESS6 Summary Risk Level		Risk	ESS6 Summary Project Team Comments ⓘ	ESS6 Summary OSPT Director Comments ⓘ
Summary Risk Level		Choose an item.	Enter text.	Enter text.
ID	ESS6 Risk Screening Questions	Response	ESS6 Risk Project Team Comments ⓘ	ESS6 Risk OSPT Team Comments ⓘ
1	Is there a risk that the project may be located within, overlap with, or directly or indirectly impact areas defined as "no-go" under ESS6 paragraph 23, such as World Heritage Sites, Alliance for Zero Extinction sites, or free-flowing rivers longer than 500 km?	Choose an item.	Enter text.	Enter text.

2	Is there a risk of conversion, degradation, or fragmentation of natural or critical habitats, or significant impacts on priority biodiversity features such as threatened species, restricted-range species, or migratory and congregatory species?	Choose an item.	Enter text.	Enter text.
3	Is there a risk that the project may introduce or spread invasive alien species through its activities, infrastructure, transport, or supply chains?	Choose an item.	Enter text.	Enter text.
4	Is there a risk that the project may involve or indirectly cause exploitation or use of living natural resources, such as timber harvesting, fisheries, hunting, or wildlife trade?	Choose an item.	Enter text.	Enter text.
5	Is there a risk of significant alteration to hydrological regimes or ecological flows due to project activities such as dam construction, water abstraction, drainage, or land conversion?	Choose an item.	Enter text.	Enter text.
6	Is there a risk that the project's primary sourcing in its supply chain may contribute to deforestation, habitat conversion, or biodiversity loss, particularly through commodities like palm oil, soy, timber, seafood, or livestock?	Choose an item.	Enter text.	Enter text.
7	Is there a risk that the project may generate pollution, waste, or other emissions (including noise, light, or chemicals) that could adversely affect biodiversity and ecosystem services?	Choose an item.	Enter text.	Enter text.
8	Is there a risk that the project may undermine Indigenous Peoples' or local communities' access to, use of, or traditional stewardship of biodiversity and ecosystem services?	Choose an item.	Enter text.	Enter text.
9	Is there a risk that the project may generate significant residual biodiversity impacts that cannot be fully avoided, minimized, or restored, and may therefore require offsetting or additional conservation measures?	Choose an item.	Enter text.	Enter text.

ESS-7: Indigenous Peoples				
ESS7 Relevance		Choose an item.		
ESS7 Summary Risk Level		Risk	ESS7 Summary Project Team Comments ⓘ	ESS7 Summary OSPT Director Comments ⓘ
Summary Risk Level		Choose an item.	Enter text.	Enter text.
ID	ESS7 Risk Screening Questions	Response	ESS7 Risk Project Team Comments ⓘ	ESS7 Risk OSPT Team Comments ⓘ
1	Is there a risk that Indigenous Peoples, as identified through the ESS7 process, are present in or have a collective attachment to the proposed project-affected area?	Choose an item.	Enter text.	Enter text.
2	Is there a risk that the project may have direct or indirect adverse impacts on Indigenous Peoples?	Choose an item.	Enter text.	Enter text.

3	Is there a risk that socio-cultural groups identified as indigenous peoples under ESS7 criteria may not be recognized by the borrower, resulting in non-implementation of ESS7 requirements?	Choose an item.	Enter text.	Enter text.
4	Is there a risk that the project may trigger the need for free, prior, and informed consent (FPIC) of affected IPs due to: (i) adverse impacts on land and natural resources to traditional ownership or under customary use or occupation; (ii) relocation of IP from lands and natural resources subject to traditional ownership or under customary use or occupation; (iii) significant impacts on IP cultural heritage that is material to their identity and culture, and/or to ceremonial and/or spiritual aspects of their lives.	Choose an item.	Enter text.	Enter text.
5	Is there a risk that the project may not obtain FPIC of affected IPs at appraisal or may fail to maintain it during implementation?	Choose an item.	Enter text.	Enter text.
6	Is there a risk that ESS7-specific impacts, including non-tangible cultural and spiritual impacts, may not be adequately assessed or mitigated?	Choose an item.	Enter text.	Enter text.
7	Is there a risk that the project may directly or indirectly affect areas inhabited by IPs living in voluntary isolation or with limited outside contact?	Choose an item.	Enter text.	Enter text.
8	Is there a risk that the project may further marginalize IPs or fail to deliver development benefits and opportunities in a culturally appropriate manner?	Choose an item.	Enter text.	Enter text.
9	Is there a risk that the borrower/client may lack sufficient capacity, time, or resources to assess and manage ESS7-related risks and impacts effectively?	Choose an item.	Enter text.	Enter text.
10	Is there a risk that the project may not establish appropriate consultative processes, allocate sufficient time and resources for decision-making, or set up a culturally appropriate grievance mechanism for Indigenous Peoples?	Choose an item.	Enter text.	Enter text.

ESS-8: Cultural Heritage				
ESS8 Relevance		Choose an item.		
ESS8 Summary Risk Level		Risk	ESS8 Summary Project Team Comments ⓘ	ESS8 Summary OSPT Director Comments ⓘ
Summary Risk Level		Choose an item.	Enter text.	Enter text.
ID	ESS8 Risk Screening Questions	Response	ESS8 Risk Project Team Comments ⓘ	ESS8 Risk OSPT Team Comments ⓘ

1	Is there a risk that the project may impact, or be located within the vicinity of, a recognized cultural heritage site - whether legally protected or not - including archaeological sites, built heritage, burial sites, underwater heritage, natural features with cultural significance, or moveable cultural heritage?	Choose an item.	Enter text.	Enter text.
2	Is there a risk that the project may adversely affect intangible cultural heritage such as traditions, performing arts, social practices, rituals, festive events, or community-held knowledge and skills passed down through generations and recognized by communities as part of their cultural identity?	Choose an item.	Enter text.	Enter text.
3	Is there a risk of landscape-level impacts on natural features with cultural significance, such as hills, mountains, streams, rivers, waterfalls, caves, groves, or forests? Is there a risk of landscape-level impacts on natural features with cultural significance, such as hills, mountains, streams, rivers, waterfalls, caves, groves, or forests?	Choose an item.	Enter text.	Enter text.
4	Is there a risk that the project may alter the setting, visual integrity, or user experience of a culturally significant site?	Choose an item.	Enter text.	Enter text.
5	Is there a risk that the project may permanently restrict access to, or prevent the use of, cultural heritage sites by affected communities or stakeholders?	Choose an item.	Enter text.	Enter text.

ESS-9: Climate Change				
ESS9 Relevance		Choose an item.		
ESS9 Summary Risk Level	Risk	ESS9 Summary Project Team Comments i	ESS9 Summary OSPT Team Comments i	ESS9 Summary OSPT Director Comments i
Summary Risk Level	Choose an item.	Enter text.	Enter text.	Enter text.

ESS-10: Stakeholder Engagement and Information Disclosure				
ESS10 Relevance		Choose an item.		
ESS10 Summary Risk Level	Risk	ESS9 Summary Project Team Comments i	ESS9 Summary OSPT Team Comments i	ESS9 Summary OSPT Director Comments i
Summary Risk Level	Choose an item.	Enter text.	Enter text.	Enter text.
ID	ESS10 Risk Screening Questions	Response	ESS10 Risk Project Team Comments i	ESS10 Risk OSPT Team Comments i
1	Is there a risk that the project's type, location, sensitivity, or scale may affect the adequacy of stakeholder engagement, information disclosure, or grievance management processes?	Choose an item.	Enter text.	Enter text.

2	Is there a risk that permanent, temporary, or legacy environmental and social risks and impacts - such as biodiversity loss, land acquisition, Indigenous Peoples' presence, or vulnerability of project affected persons - may influence the scale and effectiveness of stakeholder engagement, information disclosure, or grievance management?	Choose an item.	Enter text.	Enter text.
3	Is there a risk of reprisals associated with the project, including borrower/client capacity to ensure stakeholder engagement is free from manipulation, discrimination, coercion, intimidation, or threats, and to respond effectively to legacy issues or lack of trust?	Choose an item.	Enter text.	Enter text.
4	Is there a risk that significant contextual factors - such as legacy lack of trust, governance gaps, weak legal or institutional frameworks, cultural norms, limited civic space, human security concerns, or sector-specific sensitivities - may hinder the design and implementation of stakeholder engagement in line with ESS10?	Choose an item.	Enter text.	Enter text.
5	Is there a risk that the borrower/client may lack sufficient institutional capacity, resources, designated personnel, authority, commitment, responsiveness, or a strong track record to design and implement stakeholder engagement effectively, given the scope and complexity of identified risks?	Choose an item.	Enter text.	Enter text.

Appendix 1- Environmental and Social Regulatory Frameworks – Pacific Countries

Country	Environmental Assessment	Land Arrangements	Labour & OHS	SEAH Framework	Traditions & Cultural Heritage
Cook Islands	Environment Act 2003; NES reviews EIA requirements	Predominantly customary land; leasing via Ministry of Justice	Employment Relations Act 2012; Minimum Wage Act	Covered under Employment Relations Act, Harassment Act 2017, Criminal Law	National Heritage Trust Act; Cook Islands Heritage Trust
Fiji	Environment Management Act 2005; EIA Regulations 2007	State, freehold, and iTaukei land; managed by Lands Dept & iTaukei Land Trust Board	Employment Relations Act 2022; Health & Safety at Work Act	Multi-agency: Police, Ministry of Women, Employment Ministry	Heritage (Amendment) Act 2015; Ministry of iTaukei Affairs
Kiribati	Environment Act 1999; MELAD administers EIA	Customary (native) and state land; leasing via MELAD	Employment & Industrial Relations Code Act 2015	Te RauTe Mwenga Act; SafeNet multi-agency response	Constitution; Te Umwanibong Act 2022
Tuvalu	Environment Protection Act 2008; EIA Regulations 2014	Customary and Crown land; Lands Court adjudicates disputes	Labour & Employment Relations Act 2017 (limited OHS)	Penal Code; Family Protection Act 2014; Gender Affairs Dept	Constitution; Falekaupule Act
Samoa	Planning & Urban Management Act 2004; PUMA oversight	Customary, government, freehold; strong matai system	Labour & Employment Relations Act 2013; OHS Act 2002	Crimes Act; Family Safety Act; multi-agency response	Constitution; National Heritage Register Act 2021
Tonga	Environment Management Act 2010; Spatial Planning Act	All land vested in Crown; leasehold system	Limited framework; draft Employment Bill; Public Health Act	Criminal Offences Act; Family Protection Act	Constitution; Land Act; Archaeological Act 2016

Country	Environmental Assessment	Land Arrangements	Labour & OHS	SEAH Framework	Traditions & Cultural Heritage
Niue	Environment Act 2003; EIA Regulations 2017	Fully customary land; governed by Niue Act 1966	Limited OHS; governed under Niue Act	Criminal law + Ministry of Social Services	Constitution; Taoga Niue Act 2012
Nauru	Environmental Management Act 2020	Customary land; leasing under Lands Act	Employment Act 1966; Public Health Act	Criminal law; Ministry of Justice oversight	Constitution; Lands Act
FSM	Environmental Protection Act; state-level EIA systems	Customary and government land; strong clan ownership	Labour Management Code; Public Health provisions	Criminal Code; Department of Justice	Constitution; Historic Preservation Act
RMI	Environmental Protection Act 1984; EIA Regulations	Customary and government land; leasing via Land Authority	Labour Code 1975; limited OHS provisions	Criminal Code; Family Protection Act	Constitution; Historic Preservation Act
Palau	Environmental Quality Protection Act; EIA Regulations	Public and clan-owned land; regulated by Land Authority	Labour Code 1972; Public Health Act	Criminal Code; Family Protection Act; multi-agency	Constitution; National Historic Preservation Act
PNG	Environment Act 2000; CEPA oversight	Predominantly customary land; leasing arrangements	Employment Act; OHS Act 1978	Criminal Code; Family Protection Act	Constitution; Cultural Property Act
Solomon Islands	Environment Act 1998; EIA Regulations	Customary land dominant; Land & Titles Act	Employment Act; Safety at Work Act 1996	Penal Code; Family Protection Act	Constitution; National Cultural Council
Vanuatu	Environmental Management Act; EIA Regulations	Customary (~80%) and state land	Employment Act 1983; Health & Safety Act	Penal Code; Family Protection Act; Gender Policy	Constitution; Traditional Knowledge Act 2019