

Environmental and Social Management System Volume 2: Processes and Procedures Manual

October 2019



Quality Information

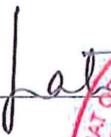
Document Environmental and Social Management System Volume 2: Processes and Procedures Manual

Date October 2019

Prepared by Peter King, Institute for Global Environmental Strategies

I hereby approve the Environmental and Social Management System and Policy for SPREP.

This policy will strengthen SPREP'S role as an Implementing Agency and/or Executing Agency and will work to manage environmental and social issues appropriately within the context of this policy.

 Date: 15th February 2017

Kosi Latu
Director General



This table tracks all revisions and updates to this policy from time to time. It attempts to capture the date of when the policy has been reviewed and updated together with the official designation and signature of the Director General or proxy for approval. A summary of the changes that are made to this policy should be provided in a separate form and attached as an "Addendum".

Policy Reviewed and Updated			
Date	Designation	Signature	Addendum Number
18/12/2019			Volume 2
20/8/2020	DIRECTOR GENERAL		

Table of Contents

Volume 2

QUALITY INFORMATION	1
1 REVIEW PROCEDURES	3
1.1 STAGE 1 - ENVIRONMENTAL AND SOCIAL SCREENING	5
1.2 STAGE 2 - ENVIRONMENTAL AND SOCIAL ASSESSMENT (ESA) AND ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)	7
1.3 STAGE 3 – PROJECT APPRAISAL AND APPROVAL	11
1.4 STAGE 4 - IMPLEMENTATION AND SUPERVISION	12
1.5 STAGE 5 - PROJECT COMPLETION AND POST-EVALUATION	13
2 RESPONSIBILITIES AND ACCOUNTABILITY	14
3 SUMMARY OF EMS REVIEW STEPS	17
APPENDIX B – ENVIRONMENTAL AND SOCIAL ASSESSMENT CHECKLIST AND CLEARANCE FORM	29
APPENDIX C – PROJECT LEVEL PROBLEM SOLVING AND GRIEVANCE MECHANISM GUIDANCE	0

1 Review Procedures

- Volume 1 of the Environmental and Social Management System (ESMS) outlines the key policies, principles and standards that govern SPREP's approach to managing the environmental and social implications of its projects. This Volume 2 outlines for project proponents, staff and contractors how these policies, principles, and standards are to be implemented.

This section describes the environmental and social review procedures along the SPREP project cycle. As illustrated in **Figure 1.1** and

- Table 1-1**, there are two key environmental and social decision points within the project cycle: E&S Screening; and E&S Clearance. Both are described in this section and the project can be stopped at either of these decision points.

Figure 1.1 Environmental Assessment in SPREP's Operational Procedures

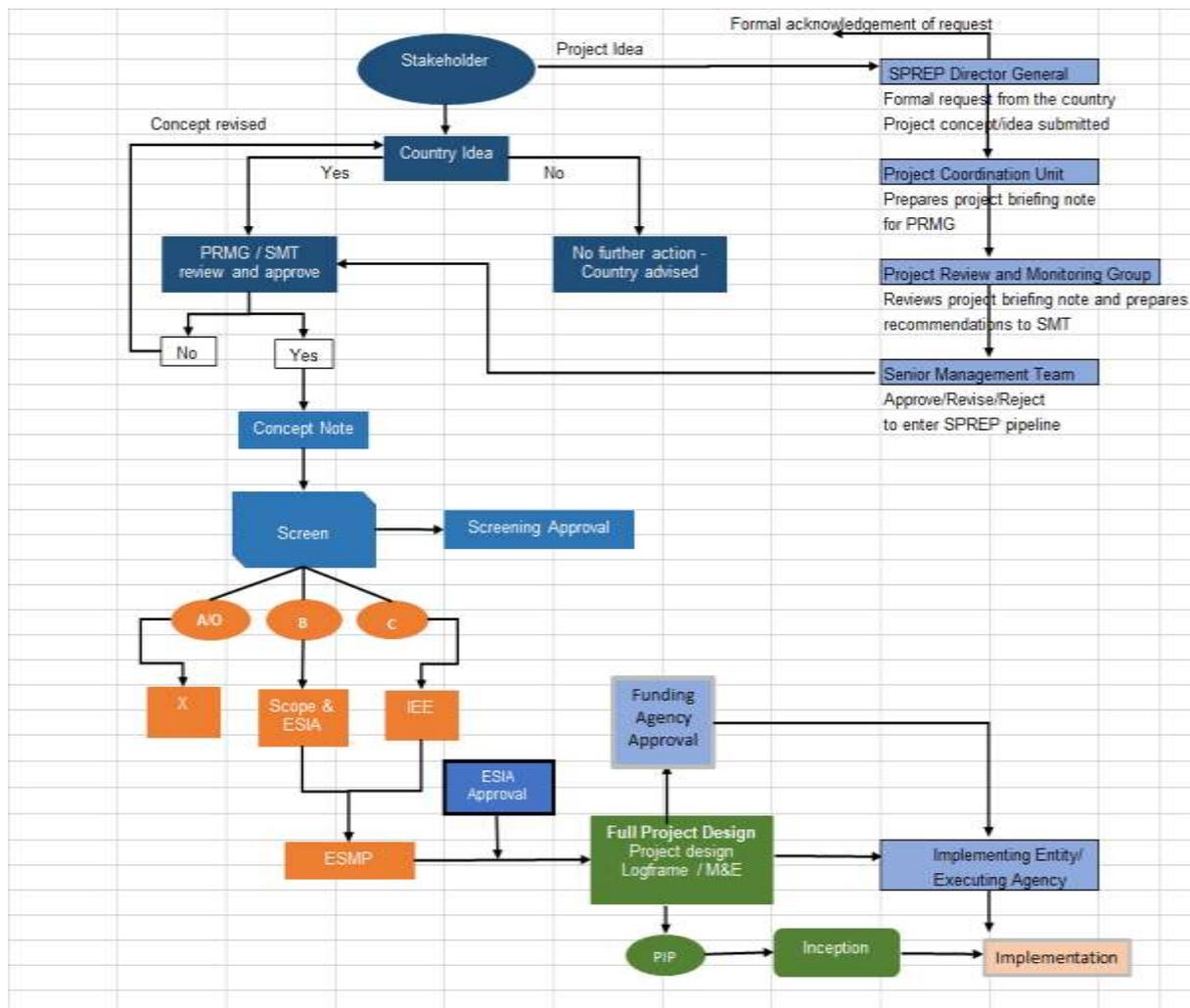


Table 1-1 Environmental and Social Review Decision Points and Responsibilities

Project Step	Category A	Category B	Category C	Category O	Feedback Loops
	<i>High/moderate Risk/Hazard Level</i>	<i>Moderate Risk/Hazard Level</i>	<i>Low Risk/Hazard Level</i>	<i>Beyond SPREP's mandate or accreditation limits</i>	
Concept Note (or PIF) to Implementing Agency	Project proponent (internal or external)	Project proponent (internal or external)	Project proponent (internal or external)	Project proponent (internal or external)	May require confirmation of national endorsement
Screening – By Project Coordination Unit (PCU) + Thematic Experts	Advise project proponent that SPREP cannot undertake this project	Scoping ESIA Terms of reference (TORs) for Environmental and Social Impact Assessment (ESIA)	Terms of reference (TORs) for Initial Environmental Examination (IEE)	Advise project proponent that SPREP cannot undertake this project	Missing or incomplete information may require revision of the Concept Note (or PIF)
Environmental and Social Assessment (ESA)	No further action	Procurement of Consultants to undertake ESIA ESIA report completed	Conduct IEE by SPREP; Identify if ESIA may be needed	No further action	ESIA/IEE may identify additional changes in project design
Environmental and Social Management Plan (ESMP)		Attachment to the ESIA (detailed ESMP)	Attachment to the IEE (brief ESMP)		ESMP may identify additional ESA needed, especially at detailed design stage
Project Design, Logframe, and Draft Budget		Incorporate ESMP into Project Design, Logframe, and draft budget	Incorporate ESMP into Project Design, Logframe, and draft budget		ESMP actions need to be fully costed and included in the draft budget.
Clearance		PCU → PRMG PCU to review and clear ESS and report to PRMG	PCU → PRMG PCU to review and clear ESS and report to PRMG		Review may identify new concerns requiring revision of ESA/ESMP
External Approval		Country approval → Funding agency approval	Country approval → Funding agency approval		National government or funding agency may require some revisions
Funding Agency Agreement		Funding agreement or	Funding agreement or		Final budget may necessitate

		Contract with SPREP Roles and responsibilities Final budget	Contract with SPREP Roles and responsibilities Final budget		some changes in intended ESS actions
Handover to Executing Agency (EA)		SPREP (as EA) – Procurement External Agency (as EA) – Contract or MoU Project permits Inception	SPREP (as EA) – Procurement External Agency (as EA) Contract or MoU Project permits Inception		Procurement or Inception Report may identify additional ESS concerns
Implementation Supervision		Monitoring and evaluation Progress reports Annual reports	Monitoring and evaluation Progress reports Annual reports		M&E may identify changes needed in ESMP
Mid-term review of Project and ESMP		External consultant recruited	External consultant recruited		Review may initiate changes in the ESMP
Project completion		Disposal of equipment, office closure etc. – Project Manager & SPREP verification	Disposal of equipment, office closure etc. – Project Manager & SPREP verification		Project completion actions may require previously unidentified ESS actions
Post-project evaluation		External consultant recruited	External consultant recruited		Feedback to future project designs of a similar nature

1.1 Stage 1 - Environmental and Social Screening

3. The purpose of screening is to review the proposed project concept to identify whether there are likely to be any adverse environmental and social risks or impacts. Screening will identify potential risks and impacts, using the Standards as a checklist. Based upon the identified potential risks and impacts, the project will be categorised in terms of environmental and social risk and/or impact. The screening will also help in scoping the environmental and social assessment and in preparing terms of reference (TORs).
4. Three categories have been defined: Categories A, B and C.

Category A – Projects with the potential to cause significant adverse environmental and/or social impacts that are diverse, irreversible or unprecedented.

Category B – Projects with the potential to cause limited adverse environmental and/or social impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures.

Category C – Projects that include activities with minimal or no risks of adverse environmental and social consequences.

5. **Category A projects should not currently be considered for SPREP support (as an implementing or executing agency). As such, if a project is categorised as a Category A project during Stage 1: Concept Development, work should be discontinued at that point.** Screening may also exclude projects for reasons other than environmental and social risks (e.g. estimated project costs greater than the limit for which SPREP is accredited). This “no project” outcome should be conveyed to the Project Proponent outlining the reasons for this assessment.
6. Screening and categorisation of the project will inform the type and level of environmental and social assessment needed to ascertain the extent of environmental and social risks and impacts.

Screening Methodology

7. Screening for environmental and social standards in the concept development phase is a desk-top process undertaken by the SPREP Project Coordination Unit (PCU) as per the Environmental and Social Policy and Standards (ESMS Volume 1), assisted by technical experts as necessary. All screening decisions will be reported to the Project Review and Monitoring Group (PRMG).
8. The following steps will be taken:
 - 1) The PCU completes the Environmental and Social Screening Report. This comprises two sections (see **Appendix A – Environmental and Social Screening Report**). The process supports the PCU to understand which of the safeguards (#1-3 mandatory, #4-10 depending on the project risks) are triggered by the project, and if so, to undertake an assessment of the extent of risk associated with that safeguard. If any safeguards #4-10 are triggered then it will typically result in a Category B or Category A project, unless the level of risk associated with the triggered safeguard is low. If information is missing to complete the Screening Report, it may be necessary to revise the Concept Note (or PIF) to provide the information needed.
 - 2) PRMG will review the Environmental and Social Screening Report to check the conclusions drawn by the PCU. The PRMG will convey their recommendation to the Senior Management Team for endorsement.
 - 3) Projects classified as Category A should not be progressed beyond this point (see explanation above).
 - 4) Projects classified as Category B or C may receive Environmental and Social Screening Approval (depending on the nature of the risks identified during the screening process), and the environmental and social assessments required to be undertaken during Stage 2: Preparation and Appraisal will be defined. Approval may be deferred if additional information is required to be included in the project Concept Note (or PIF).
 - 5) As part of *Safeguard 2 on public participation and information disclosure*, the results of the environmental and social screening may be posted on the SPREP website, if this document has been cleared for public disclosure.

Timing

9. Screening is conducted at the project concept stage (Project Identification Format—PIF in the case of GEF projects, Concept Notes for AF and GCF). Environmental and Social Screening Approval is required for a project to progress to the “Preparation and Appraisal” stage. Country clearance and

Environmental and Social Clearance must be obtained first. Country clearance may also involve consultation on the scoping of the ESA and preparation of TORs for external consultant(s).

Environmental and Social Screening Approval

The conclusion of the Environmental and Social Screening process is the Screening Approval decision. Only those projects which receive a positive approval decision will progress to the next stage of Table 1-1.

1.2 Stage 2 - Environmental and Social Assessment (ESA) and Environmental and Social Management Plan (ESMP)

10. Based on the screening process, an ESA will be conducted by an independent, external expert, usually as part of a feasibility study or project preparation study. The outcomes of the ESA will inform the development of the project ESMP. An ESMP will be developed for all categories of SPREP projects (B or C); however, the level of detail within the ESMP will vary according to the assessed environmental and social risk and impact.

Methodology for Conducting ESA

11. The scope and detail of the ESA required for a project will be proportionate to the complexity of the project and the nature and scale of the potential risks and impacts. It will also need to meet the requirements of the country regulation in the country of implementation, which may require SPREP to consult with the national environment agency on the scope of the ESA and the TORs for the external expertise. The TORs may also incorporate a mentoring or capacity building role for the external expert(s). The independent expert(s) employed to undertake the ESA will generally prepare the draft ESMP as an attachment to the ESA.

Types of ESA

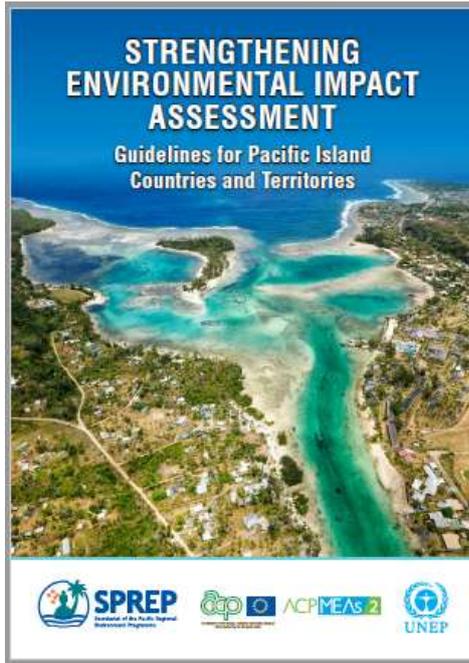
12. The purpose of the environmental and social assessment is to predict and assess the type and scale of potential impacts on affected communities and the environment and identify management strategies to reduce (or eliminate) adverse impacts and improve beneficial impacts. Three levels of environmental and social assessment have been defined in this ESMS:
 - **Environmental and Social Impact Assessment (ESIA)** - a comprehensive process for analysing environmental and social impacts with a dedicated methodology for stakeholder consultation; it encompasses an analysis of the policy, regulatory and administrative framework; analysis of project alternatives; documentation of environmental and social baseline data; analysis of environmental and social impacts generated by the project; description of stakeholder engagement conducted with regard to the project; and development of an environmental and social management plan (ESMP). Commencement of an ESIA depends on completion of scoping, preparation of TORs for external consultants, and procurement of consulting services by the Project Proponent.
 - **Initial Environmental Examination (IEE)** – Assessments limited in scope to address specific potential risks or impacts, aligned with one or more of the Standards. An IEE could be conducted in the absence of an ESIA if the project is broadly considered low risk and is appropriate for most Category C projects. Ideally, an IEE should also be completed by an external expert, but for very low risk projects, appropriate experts in SPREP could also complete this assessment. If significant environmental or social risks are identified in the IEE process, a full ESIA may be needed.

- **Risk/Hazard Assessments** – This assessment addresses risks of injury to workers and the public from potential hazards related to project activities, such as the release of toxic or hazardous material or unsafe conditions due to construction.
13. For simplicity of language, the collective term of ESA includes all three assessment types described above. It is important that assessments are undertaken in a consultative manner, involving all affected communities to the extent that is appropriate given the anticipated risks and impacts of the project and their likely impact on those communities, as well as with the relevant national agencies.
 14. Category A projects will almost always require a full ESIA to be completed. Where a Category A project has undertaken or is undertaking an ESIA, the scope of the project has a level of risk currently beyond SPREP’s mandate and SPREP should be excluded as a potential implementing or executing agency. However, if SPREP staff intend to be engaged as a technical expert on a Category A project being designed and implemented by a national government or development partner, specific exemption needs to be obtained from the Senior Management Team and the resulting ESIA should note that SPREP involvement does not imply endorsement of the ESIA results.
 15. The process for determining the appropriate level of environmental and social assessment for a Category B project will be informed by two additional factors:
 - Does national legislation require the project to undertake an ESIA? If yes, then an ESIA will need to be completed. If no, the project progresses to the next question;
 - Is the project likely to have significant risks under Safeguards #1-3 and/or trigger any of SPREP’s Safeguards #4--10? If yes, then generally the project will have to complete an ESIA appropriate to the scale of the risk. If no, the project will likely be required to complete topic specific assessments relevant to the potential impacts generated by the project.
 16. Category C projects will follow a similar decision pathway to Category B projects; however, it is more likely that a Category C project will only require an IEE or a risk/hazard assessment.
 17. *Safeguard 1: Assessment and Management of Environmental and Social Risks and Impacts* applies to all projects considered by SPREP. This safeguard provides the basis of the environmental and social assessment approach used by SPREP. As described in Section 2 of Volume 1, the applicability of Safeguards #4-10, however, depends upon the specific conditions of the project.

Content and methodology for an ESIA

18. SPREP has developed a regional guideline on Strengthening Environmental Impact Assessment that outlines the standard methodology for conducting ESIA. While this needs to be kept up to date with latest international best practice guidance, it provides a useful starting point for preparation of an ESIA. In particular, the EIA Screening Checklist (page 37-41) would form a useful approach for an IEE, although some sector specific criteria may need to be added. ADB’s guidance can also assist in providing a comprehensive approach to ESIA and IEEs¹.

¹ <https://www.adb.org/sites/default/files/institutional-document/32635/files/environmental-assessment-guidelines.pdf>



Typical Table of Contents

- Abbreviations and Acronyms
- Glossary
- Executive Summary
- Introduction
- Policy and Legal Framework
- Project Description and Justification
- Description of the Baseline Environment
- Impact Assessment
- Cumulative Impacts
- Environmental Management
- Stakeholder Engagement and Consultation
- Conclusions and Recommendations
- Disclosure of Consultants
- References
- Appendices

19. Possible content of a typical IEE is drawn from ADB as follows:

- A. Introduction
- B. Description of the Project
- C. Description of the Environment
- D. Screening of Potential Environmental Impacts and Mitigation Measures
- E. Institutional Requirements and Environmental Monitoring Plan
- F. Public Consultation and Information Disclosure
- G. Findings and Recommendation
- H. Conclusions

Content and methodology for developing the ESMP

20. The ESMP will draw upon the findings from the ESIA/IEE and document them in a format which can be used to manage and mitigate the environmental and social risks and impacts of the project. The ESMP should cover the following topics:

- A summary of the overall approach to environmental and social risk and impact management
- Detail of all identified environmental and social risks and impacts
- Detail of mitigation measures which will be applied for each risk
- Roles and responsibilities for management of risks and impacts
- Monitoring and evaluation framework
- Reporting requirements
- Detail of the problem solving and grievance mechanism

- Relevant Annexes including ESIA/IEE (if the ESMP is a separate standalone document) and other study reports, details of consultations etc.

Typical Table of Contents of ESMP

- 1. Introduction (Brief Project Description, ESIA/IEE Methodology, Public Participation and Consultation, Engagement with Government etc.)**
 - 2. Project Activities (Equipment Procurement, Installation, Operation, Repair, Replacement and Disposal, Local Action Plans, Case Studies, Pilot Projects etc.)**
 - 2.1 Environmental Implications
 - 2.2 Social Implications
 - 2.3 Mitigation Measures
 - 3. Social Management and Gender Action Plan (Public Participation, Problem Solving, Grievance and Appeals Mechanism, Information Disclosure, Gender Action Plan, Youth Involvement, Indigenous Peoples Plan (where applicable), etc.)**
 - 4. Project Management Unit(s) Office Management (Green Procurement, Waste Management, Staff and Contractor Training, Community Engagement etc.)**
 - 5. Monitoring and Evaluation**
 - 6. Reporting and Budgeting**
 - 7. Conclusions and Recommendations**
- Annexes (including the ESIA/IEE, if the ESMP is a standalone document)**

21. Once the ESMP has been completed, the environmental and social appraisal of the project will commence. For Category B and C projects, the Project Proponent will review the quality of the ESMP and any underlying environmental and social assessments to determine whether the information is sufficient for decision-making. Where an ESIA has been submitted for government approval (i.e. preferred procedure), government feedback and approval status of the ESIA must be incorporated into the environmental and social appraisal.
22. For Category B projects, the environmental and social appraisal would be conducted by the PCU and reported to the PRMG. The review should confirm that the ESMP (including the environmental and social assessment):
 - Complies with the terms of reference provided for the environmental and social assessment;
 - Has adequately identified the environmental and social impacts potentially generated by the project, has applied the mitigation hierarchy and has reduced the impacts and risks to an acceptable level;
 - Has received government approval for an ESIA (preferred) if one was required for the project;
 - Is in accordance with the SPREP Environmental and Social Policy and Standards;
 - Presents information of sufficient relevance and quality allowing an adequate understanding potential impacts of the project and its alternatives;

- Defines an appropriate monitoring and evaluation plan;
- Takes account of stakeholder comments and concerns and documents this process; and
- Presents a management plan demonstrating the commitment of the necessary human and financial resources to implement the mitigation measures identified in the environmental and social assessment.

1.3 Stage 3 – Project Appraisal and Approval

23. An appraisal checklist has been developed to support this review (Appendix B – Environmental and Social Assessment Checklist). Based on this review, the PCU and project proponent will make a recommendation on the adequacy of the environmental and social assessment. Three recommendations are possible:

- Adequate – the environmental and social assessment is considered to have met the requirements outlined above and the project presents an appropriate range of mitigation measures to manage environmental and social risk at an acceptable level. Some additional studies may be required.
- Partly sufficient – Additional information, data, analyses or stakeholder feedback needs to be collected to inform the assessment, before the project can proceed.
- Inadequate – Serious deficiencies requiring immediate remedy have been identified.

24. The final step to be completed during Stage 2: Preparation and Appraisal is the Environmental and Social Clearance. The Clearance process is undertaken by the Project Proponent and PCU and reported to the PRMG. The purpose of the clearance process is to appraise whether the findings of the environmental and social assessment have been adequately built into the project proposal (including the logical framework and draft budget) through the ESMP. The appraisal is formally documented on the Environmental and Social Clearance form (see Appendix C), which is a sign-off form that concludes the environmental and social assessment process. Three outcomes are possible:

- Cleared – the project is considered to have met all requirements with regards to avoiding or mitigating environmental and social risks: the proposal is accepted;
- Conditionally cleared – the project is considered to have materially met most requirements, but additional work is required in a discrete number of areas to bring it into full clearance;
- Clearance rejected – the project has not met SPREP’s environmental and social requirements and will not progress to the next stage of the project cycle. In some cases, additional work is required for the project to get clearance, while in others; clearance may be rejected because of a potentially fatal environmental and social flaw which cannot be remedied.

Timing

25. The environmental and social assessment will be conducted and the ESMP developed during the “project preparation and appraisal” stage (Stage 2). Usually this is done in conjunction with a feasibility study or project preparation technical assistance.

Environmental and Social Clearance

At the conclusion of Stage 2 is the Environmental and Social Clearance Decision. Only those projects receiving clearance are eligible to progress to the next phase of Table 1-1.

1.4 Stage 4 - Implementation and Supervision

26. The distinction between the specific roles of SPREP as an implementing agency (essentially a delegated responsibility from the funding agency) and an executing agency need to be clearly understood. Implementation is often understood as the responsibility of an implementing agency, when it is actually the responsibility of an executing agency. Further complication is caused when the implementing and executing agency are the same organisation. Generally, the role of the implementation agency is restricted to project supervision rather than on-ground execution of a project.

Implementation Management

27. Managing the environmental and social performance of a project is critical during the start, implementation and closure phases of all projects. Project management needs to achieve several objectives:

- Contractors, project staff, affected communities, and other stakeholders are fully aware of the proposed environmental and social mitigation measures contained in the ESMP;
- Procurement of goods and services for the project considers the environmental and social consequences and wherever possible minimises any possible harm;
- Project staff are trained to recognise any potential environmental or social damage being caused by the project and fully equipped to deal with such damage, especially in emergency situations;
- Project management units should demonstrate environmental and social management best practices; and
- Problem-solving and grievance mechanisms are established from the outset of project implementation.

28. The ESMP should set out in considerable detail all the necessary environmental and social mitigation measures, budget and resource allocations, timing, and implementation responsibilities.

Monitoring and Evaluation of Environmental and Social Performance

29. Monitoring and evaluation of environmental and social performance is critical during the implementation and closure phases of a project. Monitoring needs to achieve several objectives:

- To verify the project is implementing the mitigation measures committed to within the project proposal and ESMP;
- To assess the effectiveness of the mitigation measures and determine if additional measures are needed to minimise environmental and social impacts;

- To inform communication updates prepared for affected communities and interested stakeholders and to respond to any concerns the affected communities may have about implementation activities;
 - To report on progress and any implementation difficulties to funding agencies or co-implementing agencies; and
 - Most importantly, to learn from implementation success and failure, so these findings are fed back into future project designs and implementation arrangements.
30. Monitoring should be undertaken by the executing agency project management unit, with regular reporting through to SPREP.
31. Guidance from the monitoring and evaluation process needs to be fed into the future concept development process to achieve continuous improvement in SPREP's projects.

Methodology for implementing Monitoring and Evaluation

32. Routine monitoring shall be undertaken by the executing agency on an annual basis and reported through an agreed monitoring and reporting template, drawn from the logical framework. Reports are submitted to the national government and the implementing agency.
33. The monitoring and evaluation report will be audited annually by an independent, external safeguards expert. Any recommendations from the audit are to be incorporated back into the ESMP and the annual monitoring plan.
34. The project environmental and social safeguard monitoring and evaluation report, audit assessment, updated ESMP and monitoring plan are to be submitted to the PCU for review and PRMG approval.

Methodology for Project Supervision

35. As an implementing agency, SPREP has responsibilities to the funding agency and the national government to ensure that no SPREP project causes significant environmental or social harm. This responsibility requires careful supervision of executing agencies through field missions, review of progress reports, undertaking mid-term and project completion assessments, and addressing any concerns raised by affected communities or stakeholders that have not been adequately resolved at the project level.
36. SPREP may engage its own internal audit team or external auditors to conduct routine and/or extraordinary audits of project performance, including adherence to the provisions of the ESMP. The results of such audits should be conveyed to the Senior Management Team if issues requiring high level intervention have been revealed.

1.5 Stage 5 - Project Completion and Post-Evaluation

37. Responsibility for management of the environmental and social implications of each project is not completed at the end of the project implementation period. At the end of the project there may be surplus materials, left over equipment, office equipment or other disposable items that must be dealt with. The ESMP should specify what is to be done with these items once the project is completed and ensure that any disposal is undertaken in an environmentally sound manner. Office equipment that is no longer needed may be donated to a local charity, school, or nongovernmental organisation, provided proper documentation is completed to guard against

any suggestion of corrupt practices. Auctioning of used office facilities or construction equipment may also be necessary. The project asset register should be used to record these actions.

38. The social implications at project completion should also be documented in the ESMP. For example, does the community have the necessary capacity to manage any community-based resources once the project team has left? Is the affected community completely satisfied with the completed project or are there residual concerns that could undermine the sustainability of the project? Are the responsibilities for continued operation of the project facilities fully documented and understood?
39. One of the best ways to learn from project experience is to return to the project after it has been in operation for several years. Post-evaluation should be considered in two-phases (i) a project completion report, at the end of the project implementation period; and (ii) a post-evaluation assessment conducted at 5-10 years after the project completion. The project completion report provides useful information on the challenges faced during implementation and how they were addressed (and hopefully resolved). The post-evaluation assessment addresses the issue of sustainability, long term impact, and the extent to which the continued operational activities have gone according to plan. While both types of assessment apply to overall project implementation, the environmental and social outcomes should be mainstreamed into these assessments, conducted by external experts.

2 Responsibilities and Accountability

2.1 Public Consultation and Disclosure in the Environmental and Social Assessment Process

40. *Safeguard 2: Stakeholder Engagement and Information Disclosure.* Effective stakeholder engagement is essential throughout the project cycle. Given the importance of the Environmental and Social Assessment process, and its relevance to affected communities, additional public consultation and disclosure activities need to be undertaken during this phase of the project cycle. The purpose of these activities is to ensure affected communities and interested stakeholders are provided with relevant information and engaged through meaningful consultations on the project development plans. Tables 4.1 and 4.2 outline the minimum consultation and disclosure requirements during the project cycle. The consultation and disclosure requirements of the host country will also need to be addressed at a project level. Data sharing by the PICTs is being undertaken through the Inform Project (2017-2021)².

Table 2.1 Minimum Consultation Requirements

SPREP Project Cycle	Consultation Requirement	SPREP verification of consultation requirement	Applicable for
<i>Stage 1: Concept Development (Screening against Standards)</i>	Initial consultation of E&S issues with relevant project stakeholders including project team, affected communities (if possible) etc.	Social and Environmental Screening Report and Screening Approval	All projects

² <https://www.sprep.org/inform>

<i>Stage 2: Preparation and Appraisal (development of ESMP)</i>	Scoping Study: consultation with relevant stakeholders to determine most critical impacts to focus the ESA	Appraisal of ESA report and approval of the ESMP (by PRMG), as evidenced by Environmental and Social Clearance	Category A projects – report back to stakeholders that SPREP is unable to proceed
	ESIA: Consultation with relevant stakeholders and affected communities to understand concerns, assess significance of impacts and design mitigation measures. Informed by Government requirements also.		Category B projects
	ESIA: Final stakeholder meeting to present draft ESIA and draft ESMP		Category B projects
	ESIA report: description of consultation process, including summary of concerns and how they have been addressed		Category B projects
<i>Stage 3: Final Project Approval in SPREP</i>	PRMG and SMT review and approve project	Environmental and Social Clearance	Category B and C projects
<i>Stage 4: Implementation and Supervision</i>	Monitor progress of ESMP implementation and effectiveness of mitigation measures: consult with affected communities and review grievances received.		Category B projects
<i>Stage 5: Project Completion and Closing</i>	Evaluate effectiveness of mitigation measures: stakeholder consultations		Category B Projects

Table 2.2 Minimum Public Disclosure Requirements

SPREP Project Cycle	Documents to be disclosed	Applicable for...	When and where disclosed
<i>Stage 1: Concept Development</i>	None		
<i>Stage 2: Project Preparation and Appraisal</i>	Draft ESIA	Category B projects	Prior to final stakeholder consultation, in local channels accessible by relevant stakeholders for review and comment

	Final ESIA/IEE including ESMP	Category B and C projects	After Environmental and Social Clearance, on SPREP website and local channels
<i>Stage 3: Final Project Approval in SPREP</i>	Project proposal once approved and financing confirmed	All projects	After country and funding agency approval, on SPREP website
<i>Stage 4: Implementation and Supervision</i>	ESMP monitoring reports	Category B projects	After review by funding agency, on SPREP website
<i>Stage 5: Project Completion and Closing</i>	ESMP monitoring reports	Category B projects	After review by funding agency, on SPREP website

2.2 Problem Solving and Grievance Mechanism

41. *Safeguard 3: Accountability, Grievance and Conflict Resolution* is an increasingly important environmental and social safeguard. Accountability is achieved both through the allocation of responsibilities within SPREP's organisation, and through providing a vehicle (a problem solving and grievance mechanism, at both project and corporate levels) for stakeholder concerns to be raised.

42. The purpose of a problem-solving and grievance mechanism is to receive and facilitate the resolution of concerns and grievances held by affected communities about the environmental and social plans or performance of a project, on an ongoing basis through the planning and implementation phases. There are broadly five steps in the grievance management process, similar to the steps contained in the Fraud Prevention and Whistle-blower Manual:

- Publicise the process;
- Receive and register grievances;
- Review and investigate grievances and possible solutions;
- Develop resolution options, respond to grievances and close-out; and
- Monitor and evaluate implementation of the agreed solution(s).

43. Project Level

SPREP will ensure that projects potentially impacting affected communities develop and implement a problem solving and grievance mechanism. The responsibility for establishing the project level grievance mechanism rests with the Executing Agency and is implemented by the project management office (unit). The complexity and scale of the grievance mechanism should be appropriate to the scale of impact and size of affected population. Every effort should be made to solve the problem(s) to the satisfaction of all stakeholders before proceeding to the formal grievance mechanism. National systems for addressing grievances should be respected and drawn on where appropriate (e.g. mediation by elders). Project level grievance mechanism guidance is provided in Appendix C.

44. SPREP Level

In addition to the project level grievance mechanisms, affected communities will also be able to access (if necessary) SPREP's corporate level grievance mechanism. SPREP's grievance mechanism will be web-hosted, providing access to potentially affected communities across the PICTs, with a dedicated contact person via email, phone, fax or letter. If problems cannot be mutually resolved at the project level, stakeholders and affected communities should be able to raise their continuing concerns at the SPREP corporate level.

2.3 Roles and Responsibilities

45. Project Coordination Unit

SPREP's PCU has overall responsibility for operationalizing the ESMS. In this role, the PCU is responsible for the following tasks:

- Guiding the review and updating of ESMS procedures and templates;
- Provision of technical advice and training to Project Managers to assist them to implement the ESMS requirements; and
- Expert review of environmental and social project documentation on an annual basis.

46. Project Review Management Group (PRMG)

The PRMG has the final responsibility for reviewing the Environmental and Social Screening Approval and the Environmental and Social Clearance. It will review the recommendations of the Project Proponent and PCU and make any recommendations for modifications as appropriate before either Screening Approval or Clearance is confirmed.

47. Project Manager (Project Proponent)

The Project Proponent role described in this ESMS is likely to be undertaken by either an external person or by a SPREP Project Manager. The Project Manager's responsibilities will vary depending on whether SPREP is acting as an Implementing or Executing Agency. However, in all situations, the Project Manager has primary responsibility for ensuring that the ESMS requirements are met for the project they are developing, implementing and closing.

3 Summary of EMS Review Steps

Table 4.1 provides a summary of the key steps in the ESMS operational procedures.

Table 4.1 Summary of Review Steps and Responsibilities

SPREP Project Cycle	ESMS Review Steps		Responsible Party	Involved Parties	Guidance or Template
Stage 1: Concept Development and Categorisation	Complete Environmental and Social (E&S) Screening Report (Parts I and II)		Project Proponent, PCU	PRMG	E&S Screening Report Template
	Category B and C Projects	E&S Screening Approval Decision Review	PRMG	PCU	E&S Screening Report Template
Stage 2: Preparation and Appraisal	Category B Projects	ESIA Scoping Study	External Expert and Environment department/ ministry to scope the ESIA reports	Affected communities, PCU, project team and Environment ministries/ departments	SPREP Regional EIA Guidelines
		Prepare draft ESIA	External Expert	Affected communities, Environment ministries/departments	SPREP Regional EIA Guidance
		Public consultation on draft ESIA	External Expert	Affected communities	SPREP Regional EIA Guidance
	Category B projects	Final ESIA and draft ESMP	External Expert	Affected communities	SPREP Regional EIA Guidance

SPREP Project Cycle	ESMS Review Steps	Responsible Party	Involved Parties	Guidance or Template
	Appraisal of Environmental and Social Assessment including ESMP	National government, PCU, Project Proponent	PRMG	SPREP E&S Appraisal Checklist
<i>Stage 3: Final Project Approval in SPREP</i>	E&S Clearance	PRMG	PCU and Project Proponent	E&S Clearance Template
<i>Stage 4: Implementation and Supervision</i>	Implement mitigating measures and monitor progress	Executing entity project management office	Affected communities	Monitoring report templates
	Review of monitoring reports	Project Proponent, PCU		
	Category B Projects	Environmental and social Supervision	As part of project supervision	PCU
<i>Stage 5: Project Completion and Closing</i>	Effectiveness of ESMP evaluation Post-project evaluation	Project Proponent, National government, external expert	PCU	Project completion and Post-Evaluation reports

Appendix A – Environmental and Social Screening Report

Project ID#: _____

Environmental and Social Screening Report

Key Project Information			
Project Name			
Estimated Project Duration	Start:	Completion:	Months:
Primary Funding Agency & amount			Total Project Grant US\$:
SPREP's Role	Implementing Agency:	Executing Agency:	
Executing Partner ³			
Key Partners (in delivery)			
Beneficiary/ies countries			
Has a screening or ESIA been done before?	<i>If yes, provide details</i>		
E&S Screening Report completed by:	<i>Name, organisation and function, and date</i>		
Categorisation of Project:	<i>Please tick one</i> <input type="checkbox"/> Category A <input type="checkbox"/> Category B <input type="checkbox"/> Category C		
Screening Report reviewed and approved by Manager, PCU and reported to PRMG	<i>Name, organisation and function, and date</i>		

³ This is the agency/entity that signs an Executing Partner Agreement with SPREP where SPREP acts as an Implementing Agency.

Part I - Potential risks and impacts related to Environmental and Social Policy and Standards

Important considerations:

- Project activities are screened for their **inherent** environmental and social risk before applying mitigation and management measures. Inherent risks are risks prior to mitigation measures having been applied. It is important to form a clear picture of potential inherent risks in the event that mitigation measures are not implemented or fail.
- Screening for potential adverse environmental and social risks and impacts must consider all activities with potential direct and indirect risks and impacts across the Project’s Area of Influence.
- A Safeguard may be “triggered” when a low, medium or high risk is identified through the questions in the table below. Professional judgement will be required by the Project Proponent to determine if a low risk triggers the Safeguard, but in all cases a medium or high risk will trigger the Safeguard. Safeguards #1-3 are mandatory, but #4-10 are only triggered after consideration of each question below. Each question has been worded so that the extent of the risk can be estimated. Insufficient information in the concept note to estimate the risk at that stage should trigger the need for additional information to be collected, possibly adding to the information needed for scoping the ESA and preparing TORs.

When determining the inherent risk, the risk framework described below should be used:

Determining significance of risk:

Consequence	Likelihood				
	Not Likely	Slight	Moderately Likely	Highly Likely	Expected
Critical	Red	Red	Red	Red	Red
Severe	Yellow	Yellow	Red	Red	Red
Moderate	Green	Yellow	Yellow	Yellow	Yellow
Minor	Green	Green	Yellow	Yellow	Yellow
Negligible	Green	Green	Green	Green	Green

Green = Low Risk
 Yellow = Medium Risk
 Red = High Risk

Definition of Consequence⁴

Critical – Significant adverse impacts on human populations and/or the environment. Adverse impacts high in magnitude and/or spatial extent (e.g. large geographic area; large number of people affected; transboundary impacts; cumulative impacts) and duration (e.g. long-term, permanent, and/or irreversible); areas impacted include areas of high value and sensitivity (e.g. priority ecosystems; critical habitats; critical cultural heritage sites; legally protected areas);

⁴ Note, this risk format draws heavily upon the approach designed by the UNDP in their Social and Environmental Screening Procedure (2014)

adverse impacts to rights, land⁵, resources and territories of Indigenous Peoples; involve significant displacement or resettlement; generates significant quantities of greenhouse gas emissions; impacts may give rise to social conflict.

Severe – Adverse impacts on people and/or environment of medium to large magnitude, spatial extent and duration more limited than critical (e.g. predictable, mostly temporary and reversible). The potential risk impacts of projects that may affect the human rights, lands, natural resources, territories, and traditional livelihoods of Indigenous Peoples at a minimum potentially severe.

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

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

		To be completed by the PCU		Risk Rating			SPREP Reviewer
		<i>Yes, No, n/a, TBD</i>	<i>Where applicable describe potential issues, and specify activities causing this</i>	<i>Likelihood</i>	<i>Consequence</i>	<i>Risk Significance</i>	<i>Comments, additional observations</i>
Principle 1 Human Rights							
1	Could the project lead to adverse impacts on enjoyment of the human rights of the affected population and particularly of marginalised groups?						
2	Is there a likelihood that the project would have inequitable or discriminatory adverse impacts on affected populations, particularly vulnerable or marginalised groups?						
3	Is there a risk that potentially affected stakeholders might be prevented from participating fully in decision that may affect them?						

⁵ In connection with restrictions on use of land, “land” is taken to mean both terrestrial and aquatic resources (e.g. coastal fishing grounds).

4	Have local communities or individuals, given the opportunity, raised concerns regarding the project during the stakeholder engagement process?						
5	Is there a risk that the project could exacerbate conflicts among and/or the risk of violence to projected affected communities or individuals?						
Principle 2: Gender Equality							
1	Is there a likelihood that the project would have adverse impacts on gender equality, and/or the situation of women and girls?						
2	Have women's groups/leaders raised gender equality concerns regarding the project during the stakeholder engagement process?						
3	Could the project potentially limit women's ability to access or used natural resources upon which they depend for a livelihood?						
Principle 3: Child Protection							
1	Is the project expected to require direct interaction with children?						
2	Is there a risk that security checks have not been conducted for the executing partner?						
Principle 4: Climate Change							
1	Could the project adversely contribute to climate change impacts, or ability to adapt to climate change, or be otherwise impacted by climate change?						
Principle 5: Biodiversity and Ecosystem Services							
1	Could the project lead to adverse impacts on biodiversity and priority ecosystem services?						
Principle 6: Waste Management							
1	Could the project lead to adverse impacts associated with waste generation or disposal?						

Safeguard 1: Assessment and Management of Environmental and Social Risks and Impacts							
1	Is it likely that sufficient management and human and financial resources will not be available to the project on an ongoing basis to achieve effective and continuous environmental and social performance?						
2	Are the relevant government agencies not fully involved in assisting SPREP to assess the environmental and social risks and potential impacts?						
Safeguard 2: Public Participation and Information Disclosure							
1	Is there a risk that not all relevant stakeholders have been identified and given opportunities to contribute to project design and implementation arrangements?						
2	Is relevant project documentation on environmental and social implications of the project not readily accessible in the project area?						
3	Has relevant documentation not been uploaded to the SPREP website in a timely manner?						
Safeguard 3: Accountability, Grievance and Conflict Resolution							
1	Has any potential source of environmental or social concern or conflict associated with the project been identified at this stage?						
2	Has the national environment agency (or other relevant government agency) not been involved in determining the environmental and social risks at this stage?						
3	Is there a risk if the national government involved doesn't have an effective grievance mechanism and conflict resolution procedure already in place?						
4	Is there a risk if SPREP's corporate level grievance mechanism is not in place and operating effectively?						
Safeguard 4: Labour and Working Conditions							

1	Will the project potentially require migrant workers to construct or implement works?						
2	Will the project be required to provide accommodation services for workers?						
3	Is there a risk that the host country has not allowed union activity and permitted workers to bargain collectively?						
4	Is there potential that the project could apply adverse discriminatory practices?						
5	Will the project involve the employment of children?						
6	Is there a risk of child exploitation or abuse linked to the project?						
7	Is it likely that the project could present unsafe or unhealthy working conditions?						
	<i>Is the safeguard triggered?</i>						
Safeguard 5: Resource Efficiency and Pollution Prevention							
1	Is the project likely to release pollutants?						
2	Could hazardous waste materials be generated by the project?						
3	Are chemical pesticides likely to be used by the project?						
	<i>Is the safeguard triggered?</i>						
Safeguard 6: Community Health, Safety and Security							
1	Will the project require the construction or rehabilitation or any structural components which could pose a risk to affected communities?						
2	Does the project involve the construction or rehabilitation of a dam or weir?						
3	Is the project likely to increase community exposure to disease (water borne, water based, water related and						

	vector borne diseases as well as communicable diseases)?						
4	If the project retains security workers, is there a risk that security personnel could be responsible for unlawful and abusive acts against affected communities?						
	<i>Is the safeguard triggered?</i>						
Safeguard 7: Involuntary Resettlement							
1	Could the project involve physical relocation of people?						
2	Could the project require expropriation to resettle people?						
3	Is it likely that the project will need to acquire land from individuals and households, causing them to experience economic displacement?						
4	Will the project restrict access to natural resources and areas used by affected communities resulting in economic displacement?						
	<i>Is the safeguard triggered?</i>						
Safeguard 8: Biodiversity Conservation and Sustainable Management of Living Natural Resources							
1	Is the project likely to affect biodiversity or ecosystem services?						
2	Is the project expected to impact natural habitats but there are no plans in place to ensure no net loss of biodiversity?						
3	Is the project expected to affect critical habitat?						
4	Is the project located in a legally protected area or internationally recognised area?						
5	Is the project likely to introduce invasive alien species to the project area?						

6	Could the project impact on priority ecosystem services?						
	<i>Is the safeguard triggered?</i>						
Safeguard 9: Indigenous Peoples							
1	Is the project likely to affect Indigenous Peoples?						
2	Is the project likely to: <ul style="list-style-type: none"> a) Be located on or commercially develop natural resources on lands traditionally owned by Indigenous Peoples, with adverse impacts anticipated? b) Require the relocation of Indigenous Peoples from lands and natural resources subject to traditional ownership or customary use? c) Significantly impact critical cultural heritage for indigenous peoples? d) Use such cultural heritage for commercial purposes? 						
	<i>Is the safeguard triggered?</i>						
Safeguard 10: Cultural Heritage							
1	Is the project likely to affect cultural heritage?						
2	Is the project located in a legally protected cultural heritage area or is it likely to impact critical cultural heritage?						
	<i>Is the safeguard triggered?</i>						

Part II –Categorisation of Project and Type of Environmental and Social Assessment Required

Drawing on the responses to Part I, the following guidance is provided to assist in determining the categorisation of the project. The PCU and Project Proponent (plus any relevant technical experts) should work through the table below from left to right (columns, 1, 2, 3 and then 4).

In addition to the guidance provided below, the following “rules of thumb” may also prove instructive in determining categorisation:

- If there are potential risks and/or impacts that need to be communicated to an affected community, the project is likely to be a Category B or A.
- If the Project triggers any of Safeguards 4–10, it will be considered to be a Category A or B project.
- When determining the combined inherent risk of the project always focus on the highest risk identified. Inherent risk should not be averaged.
- Categorisation should not be based on a rigid numerical adding of risks or specific weighting, but rather a consensus should be reached by the PCU and Project Proponent once all potential risks are considered.

1. Significance of Risks Identified in Part I	2. Follow-up Questions	3. Categorisation	4. Type of E&S Assessment
<p>If high risks are identified, the project will be Category A.</p> <p>If medium risks are identified, the project may be either Category B or Category A.</p>	<p>If there are more than one or two medium risks identified, and the consequences of those risks will affect the same ecosystem or same affected community, the project may be considered category A.</p> <p>If the medium risks identified do not have any additive effects on either an ecosystem or community, then the project may be Category B.</p>	<p>Category A - Projects with the potential to cause significant adverse environmental and/or social impacts that are diverse, irreversible or unprecedented.</p>	<p>No further action by SPREP, other than notifying the project proponent and providing the reasons for the Category A rating.</p>

<p>If low risks are identified, the project will be either Category B or C.</p>	<p>If the low risks identified will adversely affect a community or an ecosystem, then the project is considered Category B.</p> <p>If the low risks identified are not expected to adversely affect either a community or an ecosystem, the project may be considered Category C.</p>	<p>Category B – Projects with the potential to cause limited adverse environmental and/or social impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures.</p>	<p>ESIA may be required, or if risk is associated with a single topic or issue, a topic specific assessment should be undertaken.</p>
<p>If minimal or no risks are identified, the project will be considered Category C</p>		<p>Category C – Projects that include activities with minimal or no risks of adverse environmental and social consequences</p>	<p>Risk/hazard assessment should be completed using an Initial Environmental Examination checklist as appropriate to the project.</p>

Appendix B – Environmental and Social Assessment Checklist and Clearance Form

This checklist is designed to assist the Project Proponent, PCU and/or SPREP reviewer to appraise the quality and sufficiency of the Environmental and Social Assessment and its associated Environmental and Social Management Plan (ESMP). As described in SPREP’s ESMS, the ESA may comprise an ESIA, an Initial Environmental Examination or a risk/hazard assessment. All projects must be assessed against those sections marked with an asterisk (*). The sections under Safeguards 4-10 should be completed by projects for which these safeguards have been triggered (as identified in the Screening process).

Project Name:	ESS Category:
Date:	
Reviewer(s):	

	Yes	No	N/A	Comment
General Appraisal *				
Does the ESA comply with the terms of reference?				
Is the structure of the ESA easy to follow?				
Does the executive summary provide an adequate summary of the significant issues and their management?				
Does the ESA identify outstanding issues which still need to be addressed?				
Policy, Legal and Administrative Framework*				
Has the ESA identified all the relevant national legislation and regulations?				
Has the ESA identified relevant international law and conventions?				
Has the ESA identified the compliance standards against which the project will be assessed (e.g. for air emissions, water quality etc.)?				
Project Description				
Does the ESA include a detailed description of the proposed project, sufficient to allow for identification of potential environmental and social impacts?				
Has the project design been influenced by environmental and social concerns or opportunities (e.g. siting considerations etc.)				
Stakeholder Engagement*				
Does the ESA describe the stakeholder engagement activities which have been conducted to support the assessment?				
Has the stakeholder engagement process been comprehensive (i.e. have all affected stakeholders been identified and engaged with?)				
Does the ESA summarise the concerns raised by stakeholders and illustrate how these have influenced project design?				

Are the affected communities broadly supportive of the project?				
Baseline Data*				
Have all relevant physical, biological, and socio-economic conditions which are relevant for decision-making about project location, design and mitigation measures been described?				
Is the period of data collection sufficient to allow for an informed decision to be made?				
Are there any gaps in the baseline data which need to be addressed?				
Impact Assessment*				
Does the list of impacts appear complete?				
Is the assessment of impacts rigorous?				
Is the methodology for assessment of impacts appropriate to the impacts being assessed?				
Has gender been considered within the impact assessment?				
Have human rights impacts been assessed (either as part of the topic assessment or as a stand-alone chapter/assessment)?				
Safeguard 1 requirements*				
Have affected communities been engaged with to inform the impact assessment?				
Have vulnerable groups or individuals been identified?				
Have cumulative impacts and transboundary impacts been addressed?				
Have associated facilities been considered within the scope of the assessment?				
Is the monitoring designed for the project appropriate to the nature of risks and impacts it is likely to generate?				
Has relevant information been disclosed to affected communities about the project?				
Has a process of informed consultation and participation been undertaken with affected communities of indigenous peoples if the project is expected to generate adverse impacts upon them?				
Safeguard 2 requirements*				
Is all relevant documentation readily accessible in the project area?				
Is the information available in local languages where English is not widely understood?				
Have the relevant documents been uploaded to the SPREP website?				
Safeguard 3 requirements*				
Have any potential conflicts been identified by project affected communities and appropriate mitigation measures identified for them?				
Does the ESMP include a clear, detailed grievance mechanism that will apply at the project level?				
Does the national government have an effective grievance mechanism and, if not, have they endorsed				

the proposed project level problem solving and grievance mechanism?				
Is the SPREP corporate level grievance mechanism fully operative?				
Safeguard 4 requirements				
Does the project have documented human resources policies and procedures?				
If accommodation services are being provided by the project, are they to an appropriate standard?				
Is there evidence of a non-discrimination policy?				
Does the project expect to have any child, forced or bonded labour concerns?				
Is the project workplace a healthy and safe workplace?				
Safeguard 5 requirements				
Have technically and financially feasible resource efficiency and pollution prevention principles been applied to the design of the project?				
Have efforts been made to reduce the greenhouse gas emissions of the project?				
Have resource efficiency measures been put in place to reduce water consumption?				
Is the waste management strategy appropriate for the nature and extent of wastes being produced?				
In case of expected use of pesticides and pest management, has an assessment of the nature and degree of associated impact of pesticide use been conducted?				
Safeguard 6 requirements				
Has the project evaluated the health and safety risks to affected communities during the project lifecycle?				
Have structural components of the project been designed and reviewed in accordance with GIIIP and World Bank EHS Guidelines with the health and safety of affected communities in mind?				
Have health and safety impacts been identified which could be exacerbated by climate change?				
Has community exposure to disease as a result of the project been assessed?				
Have human rights impacts been assessed with regard to the use of security personnel (private or public)?				
Safeguard 7 requirements				
Does the project require the restriction of access of significant areas of "land" (terrestrial and aquatic) resulting in physical or economic displacement of households?				
Have project alternatives been considered to avoid and minimise displacement?				
In case of resettlement, does the project provide compensation, assistance and benefits to enhance or at least restore livelihoods and to improve the standard of living of all displaced persons?				

Have specific measures been put in place to protect the vulnerable during the displacement process?				
Have draft resettlement action plans or livelihood restoration plans been developed by the project and are they comprehensive?				
Safeguard 8 requirements				
In the case of impacts to natural habitat, has the project been designed to achieve no net habitat loss?				
In the case of impacts to critical habitat, has a critical habitat assessment been undertaken and a biodiversity action plan been prepared?				
Will the project impact legally protected or internationally recognised areas?				
Have impacts to priority ecosystems been assessed?				
Safeguard 9 requirements				
Is the project likely to impact Indigenous Peoples?				
Has informed consultation and participation been undertaken with affected communities of Indigenous Peoples?				
Is the project likely to generate any impacts requiring Free, Prior and Informed Consent (FPIC) from affected communities of Indigenous Peoples?				
In the case of FPIC being necessary, has it been achieved?				
Safeguard 10 requirements				
Does the project have potential impact on items and areas of cultural heritage?				
Have competent professionals been used by the project to assess the impacts to cultural heritage?				
Has a chance find procedure been developed for cultural and historical artefacts?				
Alternatives Assessment*				
Have project alternatives (including the no project alternative) been identified and assessed to minimise the environmental and social impacts generated by the project?				
National Government Involvement*				
Have the relevant national government agencies been sufficiently involved in the environmental and social assessment and do they concur with SPREP's environmental and social assessment?				
ESMP*				
Have all the mitigation measures and commitments been collated into an ESMP?				
Have responsibilities been allocated for the implementation of the commitments and mitigation measures?				
Have sufficient budget and human resources been made available by the project to ensure successful implementation of the ESMP?				
Has the ESMP been fully integrated into the project design document, logical framework, and draft budget?				

Rating of Review	Check
Adequate – the environmental and social assessment is considered to have met the requirements outlined above and the project presents an appropriate range of mitigation measures to manage environmental and social risk at an acceptable level. Some additional studies may be required	
Partly sufficient – Additional information, data, analyses or stakeholder feedback needs to be collected to inform the assessment.	
Inadequate – Serious deficiencies requiring immediate remedy have been identified.	
Comments / Recommendations	

Where a project receives a rating of “adequate”, the following Environmental and Social Clearance Form should be completed.

Project ID#: _____

Environmental and Social Clearance Form

Key Project Information			
Project Name and ESS Category			Category:
Estimated Project Duration	Start:	Completion:	Months:
Primary funding agency & amount			Total Project Grant \$:
SPREP's Role	Implementing Agency: <input type="checkbox"/>	Executing Agency: <input type="checkbox"/>	
Executing Partner			
Key Partners (in delivery)			
Beneficiary/ies countries			
Project was awarded Environmental and Social Screening Approval on which date?	<i>Provide date and link to document</i>		
Environmental and social assessment documentation (including ESMP) reviewed to inform the Environmental and Social Clearance	<i>Please list documentation and online links</i>		
Environmental and Social Assessment documentation was reviewed by:	<i>Name, organisation and function, and date</i>		
Environmental and Social Clearance decision:	<i>Please tick one</i> <input type="checkbox"/> Cleared <input type="checkbox"/> Conditionally cleared <input type="checkbox"/> Clearance rejected		
For projects cleared or conditionally cleared, define any additional work required	<i>Describe additional work required</i>		
Justification for the clearance decision	<i>Please describe the basis for the clearance decision.</i>		

Appendix C – Project Level Problem Solving and Grievance Mechanism Guidance

This guidance is to assist SPREP staff and contractors to design and implement an effective problem solving and grievance mechanism in accordance with *Safeguard 3: Accountability, Grievance and Conflict Resolution*. Where a project is likely to generate adverse impact to affected communities and/or the environment, a simple problem-solving and grievance mechanism should be implemented right from the beginning of project activity on the ground. The grievance mechanism should be considered part of the suite of engagement tools used by the project and should not replace other stakeholder engagement activities. Similarly, the project needs to explain to affected communities that their use of the grievance mechanism does not inhibit their access to legal or judicial recourse processes.

The key principles of a grievance mechanism⁶:

- Proportionality – The project level grievance mechanism should be scaled to the size and stage of the project. Grievances are likely to be relatively few in the development stages and most frequent during the construction, operation and closure stages of a project.
- Problem solving first – When a problem is brought to the attention of the project management team, every effort should be made to solve the problem before the grievance mechanism is triggered.
- Cultural appropriateness – A project level grievance mechanism needs to take into consideration specific cultural attributes as well as traditional mechanisms for raising and resolving grievances. Accessibility – The level of accessibility of a grievance mechanism is influenced by clarity of communication and ease of use. Consideration of language, locations for receiving complaints, literacy and education levels and gender issues should inform the grievance mechanism design at project level.
- Transparency and accountability – All complaints must be taken seriously and treated fairly and there should be consistency and predictability in the process. The project should commit to a certain timing of responses to grievances and should monitor and share grievance resolutions (where appropriate).
- Appropriate protection – The project must ensure that there is no retribution for use of the grievance mechanism, protect the identity of individuals who file grievances, provide information on mechanisms to escalate grievances and ensure stakeholders understand their rights to use alternative remedies to resolve their grievances.

The Grievance Management Process

A basic grievance management process comprises eight steps (illustrated in [Figure C-1](#)), each of which is described below.

Step 1: Publicise the grievance mechanism procedures:

- Develop a procedure which explains how the grievance mechanism will work on the specific project site
- Present the grievance mechanism at a public meeting held with affected communities.

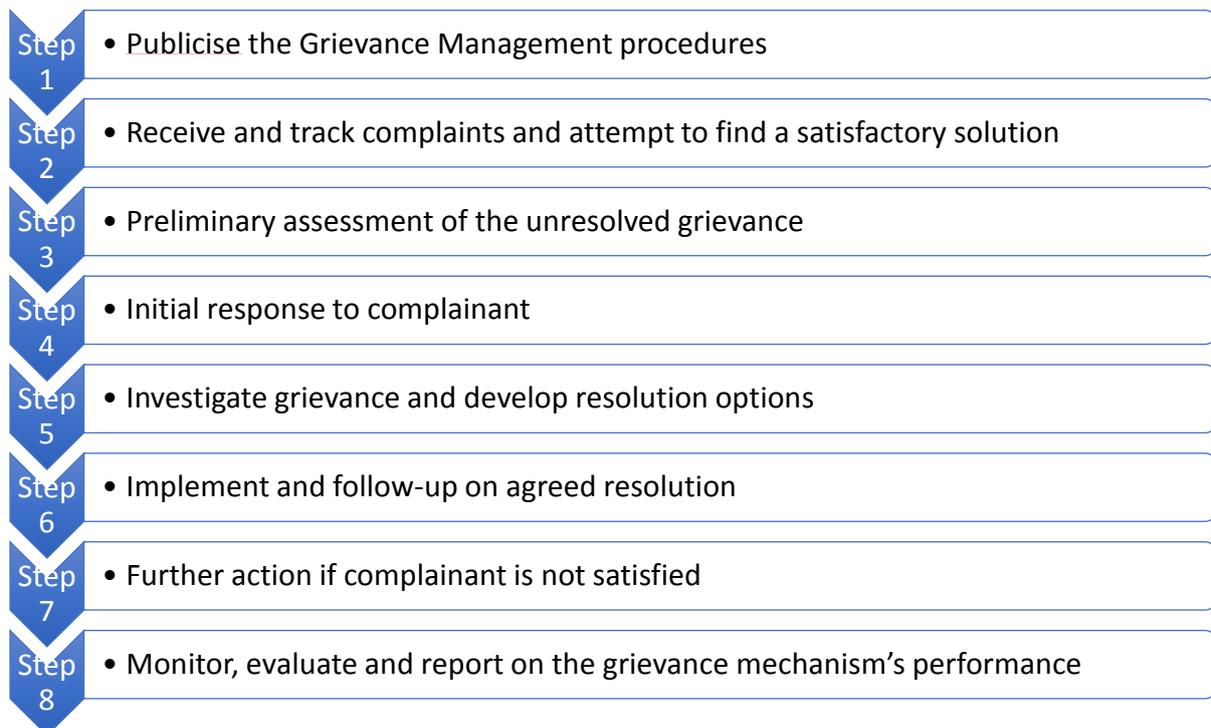
Step 2: Receive and track grievances:

- Identify locations to receive grievances and ensure accessibility to all affected stakeholders

⁶ Adapted from IFC (2014) A Strategic Approach to Early Stakeholder Engagement, www.ifc.org

- Recognise that some grievances may be submitted in writing while others will be communicated verbally. All grievances are to be treated with the same level of seriousness and respect
- Log all complaints into a database (depending on the scale of the project and the number of grievances, this might be a notebook or an excel file)

Figure C-1 Grievance Mechanism Steps



Step 3: Preliminary Assessment:

- Categorise the complaint, e.g., access to land restrictions; impacts to environment; employment; health and safety; compensation etc.
- Decide how and who will be responsible for addressing the issue

Step 4: Initial Response to Complainant:

- Write or communicate verbally (where literacy is an issue) to the complainant within a set timeframe
- Explain the process and the timeframe for the grievance mechanism process

Step 5: Investigate grievance and develop resolution options:

- Appoint an appropriate person to obtain information and investigate
- Develop a proposed resolution process, involving communities where appropriate

Step 6: Implement and follow-up on agreed resolution:

- Implement the agreed solution
- Follow-up with complainant to ensure satisfaction
- Seek sign-off from complainant, record and file documents in database

Step 7: Further action if complainant is not satisfied:



- Discuss further options
- Identify local partners who might be able to assist in finding solutions
- If still unresolved, refer matter to third-party mediation or external review

Step 8: Monitor, evaluate and report on grievance mechanism performance:

- Regularly monitor the number and type of grievances received, resolved and outstanding
- Evaluate trends over time and stages of project development