

Environmental and Social Management Framework

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Acronyms

ADB	Asian Development Bank
ACN	Activity Concept Note
APP	Australian Privacy Principles
CCDR	Climate Change Disaster Resilience
CPP	Child Protection Policy (DFAT)
DFAT	Department of Foreign Affairs and Trade (Government of Australia)
ECD	Environment and Conservation Division (SIG)
EIS	Environmental Impact Statement
EPBC Act	Commonwealth Environmental Biodiversity Protection and Conservation Act
ESMF	Environmental and Social Safeguards Framework
ESSP	Environmental and Social Safeguards Policy (DFAT)
GEDSI	Gender Equality, Disability and Social Inclusion
GRM	Grievance Redress Mechanism
MDB	Multilateral Development Bank
MECDM	Ministry of Environment, Climate Change, Disaster Management and Meteorology
MEL	Monitoring, Evaluation and Learning
MID	Ministry of Infrastructure Development (SIG)
NGO	Non-Government Organisations
PER	Public Environmental Report
PSEAH	Prevention of Sexual Exploitation, Abuse and Harassment (DFAT)
R&SST	Risk and Safeguards Screening Tool
SA	Scoping Activity
SGC	Safeguards, GEDSI, and CCDR
SIG	Solomon Islands Government
SIIP	Solomon Islands Infrastructure Program
WHS Act	Workplace Health and Safety Act (Government of Australia)

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1 Introduction

1.1 Solomon Islands Infrastructure Program

The goal of the Solomon Islands Infrastructure Program (SIIP) is to improve the quality and accessibility of economic infrastructure to contribute to broad based, inclusive and sustainable economic growth in Solomon Islands. SIIP will focus on economic infrastructure, including transport (land, sea and air), information and communications technology, electricity, water and sanitation, and infrastructure that supports rural development, to drive growth and help diversify the economy.

At the conclusion of SIIP, it is expected that:

- the Solomon Islands Government (SIG) and industry will have enhanced capacity to plan, manage, finance, construct and maintain critical economic infrastructure; and
- the Program will have left a legacy of high profile, resilient and accessible infrastructure assets in a range of sectors across the country that support inclusive economic growth.

To achieve these end of program outcomes, SIIP will work with SIG, local industry representatives, civil society and donor partners to achieve four intermediate outcomes focussed on:

- **Policies** – supporting the implementation of appropriate and effective infrastructure policies, plans, regulations and safeguards that include the integration of climate change and disaster resilience (CCDR), environmental management, gender equality, disability, and social inclusion (GEDSI).
- **Capability** – enhancing knowledge, partnerships, systems and the capacity of government, local industry and community stakeholders to build quality, life-cycle informed, and inclusive infrastructure.
- **Financing** – ensuring Solomon Islands has access to increased financial resources for inclusive economic infrastructure development, including from the private sector, Multilateral Development Banks (MDBs) and in particular, the Australian Infrastructure Financing Facility for the Pacific.
- **Construction** – delivering high priority and high quality, inclusive, ‘demonstration effect’ infrastructure on time and on budget.

SIIP will adopt a flexible approach to programming over the ten-year period. It is not possible to forecast the balance of program activities or funding between the policy/technical advice functions and the delivery modalities; these will be determined annually by the Steering Committee.

A range of technical advice, training and other capacity development approaches will be designed and delivered through the Program. The provision of capacity development activities for local industry and community groups (e.g. those engaged in gender and disability) will be delivered as part of the Program’s capacity development strategy.

For infrastructure delivery, SIIP will draw from a range of funding and procurement options that will be determined on a case-by-case basis as activities are planned, designed and implemented. Modalities will include direct delivery by Australia through the Program Hub; co-financing; delivery by partners; and other Australian programs.

1.2 Safeguard definitions

It can be difficult to untangle the management of environmental and social risks through safeguard policies from the various issues and cross cutting themes that are also commonly referred to as “safeguard issues”.

The cross-cutting themes that are embedded into SIIP as Guiding Principles, such as GEDSI, CCDR, capacity development, and local content, encompass broad ranging principles that not only inform and underpin the SIIP design, but incidentally share many principles and ideals with the DFAT Environmental and Social Safeguard Policy (and this ESMF). However, in and of themselves, they do not form a part of “safeguards” in

the context of this ESMF. The operationalisation of SIIP *cross cutting themes* based on these shared principles will be guided by different guiding documents and specialist advisers:

- **SIIP's guiding document for safeguards is this Environmental and Social Management Framework (ESMF)**, which focuses on the **prevention of harm** through activities conducted or funded by SIIP. The ESMF documents a timely, risk-based environmental and social impact assessment and management process, commensurate with activity risk and based on good international industry practice. They are process-based, and while there is room for building in social and environmental benefits, the safeguards are implemented in a necessarily staged and compliance-based manner focused largely on activities with identified environmental and social risks.
- **SIIP's guiding documents for the cross-cutting themes include the GEDSI Strategy, the CCDR Strategy, the Capacity Development Strategy, and the Local Content Strategy.** This suite of documents will grow to include all of their related planning documents. The delivery of these strategies will involve many different modalities and points of access into SIIP, and are not focused on activities, but on longer term and larger scale behavioural change and capacity and capability improvements.

1.3 Purpose of this ESMF

SIIP will be supporting SIG, and working with other development partners, in the development of infrastructure across Solomon Islands, however the scope and location of these activities is not yet known.

An ESMF is a tool produced when the full scope of activities under an aid investment is not yet fully known. Its purpose is to set out how the environmental and social impacts of the investment activities will be identified, assessed, and managed in a way that is consistent with the DFAT Environmental and Social Safeguards Policy (ESSP) and other related safeguard policies. It is not meant to be prescriptive or instructive, but is intended to provide assurance to DFAT and other stakeholders that safeguard policies and SIG legislative and regulatory requirements will be met in a structured way.

SIIP has developed this ESMF to provide a clear and practical guidance document, with the prescribed level of safeguard inputs required for activities proportionate to, and commensurate with, the activity scope, size, and risk profile (screening). This ESMF is the first safeguard document issued by SIIP, however it will be soon followed by a more detailed set of procedures and guidance, and a range of reference sheets, automated tools, and training materials (informed by key stakeholder engagement and team collaboration) that will be easy to understand and use.

1.4 How to use this ESMF

1.4.1 Three ESMF activity types in SIIP

The Program Design Document outlines the nine (expected) functional areas of the SIIP Program Hub, shown in Figure 1.

Figure 1. Nine functional areas of the SIIP Program Hub

Relationships & Partnerships Strategic relationships, partnering arrangements, coordination with other donors and programs, government, industry and community stakeholder engagement	Delivery of Infrastructure Project screening and selection, design services, project preparation services, procurement, construction management, contract admin, implementation of building standards, environmental and social safeguards, technical advice to DFAT, SIG and contractors	Performance & Risk Management Program and activity level MEL systems, knowledge management, DFAT/quality reporting, risk management plans and systems, regular reviews	Corporate Services Financial management and operations, office and administrative support, internal and external audit services, compliance with DFAT policies and standards, public diplomacy	
Governance & Management Secretariat and other support for the Steering Committee, establish and maintain working relationships with government, industry and community stakeholders	Policy & Technical Advice Plan, recruit and manage technical advisers, provide policy and technical advice to SIG agencies and DFAT, integrate technical advice with other program activities and coordinate with other programs	Capacity Building & Local Content Design, management and delivery of training and capacity building, coordination with SIG agencies, construction industry and training providers, as well as community groups	GEDSI Universal design principles, social safeguards, project guidelines, policy and technical advice for DFAT, SIG, industry and training providers. Community engagement	
CCDR & Environment Standards and guidelines for the infrastructure life-cycle, environmental and social safeguards, policy and technical advice for DFAT, SIG, industry and training providers				

There are three key activity types of this framework, related in part to the nine functional areas outlined in the Program Design Document.

SIIP ESMF Activity Type 1 Program Hub Operational Activities

The functional areas shaded orange broadly represent the activities for which safeguards risks and impacts are largely personnel-based and predominantly managed by SIIP and Cardno’s **operational** policies, procedures, and contractual mechanisms. Any non-typical activities (e.g. a summit, workshop, training course, or field visit) falling under these functional areas will be managed primarily through the Screening process. The controls applicable to Level 1 apply to ALL activities carried out or supported by SIIP.

SIIP ESMF Activity Type 2A Infrastructure Delivery Activity Inception

The functional areas shaded yellow have broader obligations in SIIP, at many different entry points, but from an ESMF safeguards perspective, these advisers have set responsibilities and inputs if and when any Infrastructure Delivery Activity is conceived and documented into an Activity Concept Note (ACN). It’s noted that, while not forming part of the 2A ESMF Activity, these functional areas and advisers are required to provide technical input and guidance on all infrastructure delivery activities at each stage of the project development process. The mechanisms for this will be further detailed in the processes (Annex A).

SIIP ESMF Activity Type 2B Infrastructure Delivery Activities

The Infrastructure Delivery (shaded navy) functional area is the only ESMF Activity Type for which the full range of DFAT ESSP safeguards will be relevant, including physical displacement and environment. Based on screening, a more comprehensive consideration of environmental and social management (and related resourcing) commensurate with the size, scope, and risk profile of the activity, will be required.

Sections 3 and 0 of this ESMF are structured based on these three ESMF Activity Types.

2 Legislative and Regulatory Operating Context

SIIP will be implemented as a partnership between the governments of Australia and Solomon Islands. Each government's respective commitments will be specified in a Subsidiary Agreement. Australia and SIG will retain responsibility for maintaining their relationships with other development partners, regional entities and MDBs.

All DFAT aid investments recognise the primacy of the partner government's legislative and regulatory sovereignty. SIIP's activities will be carried out in compliance with Solomon Islands' legislative and regulatory requirements. DFAT safeguards policies should be treated as supplementary to those requirements, and filling gaps if and where they exist, to ensure DFAT's investments are able to be implemented in compliance with both partner governments' requirements.

2.1 SIIP guiding principles

Drawing on the lessons learnt from Australia's previous investments in infrastructure, a set of **guiding principles** has been developed to inform program decision-making and to guide the design and implementation of infrastructure projects funded under SIIP. These principles have informed the approach of this ESMF, and the process will be reviewed yearly to ensure that the environmental and social safeguard processes produce outcomes that are consistent with these principles.

Alignment: all activities delivered under SIIP must align with SIG and Australian development objectives, while also ensuring that SIIP funding is additional, and does not displace other public or private sources of infrastructure investment.

Inclusivity: all SIIP activities will integrate considerations of gender, disability and geographical spread (rural/provincial) to maximise the inclusiveness of outcomes delivered through the Program.

Two fundamental principles will inform the GEDSI approach in SIIP:

- 'Nothing about us without us.' People with disabilities and women can speak for themselves and should be represented in both consultation and decision-making groups within the context of SIIP.
- Going beyond compliance and 'do no harm', to fostering empowerment. This will require addressing norms, attitudes and the lack of information that otherwise limits the empowerment of women and people with disabilities.

Climate Change and Disaster Resilience: SIIP will strengthen CCDD through integrated approaches in infrastructure planning, design and delivery including through life-cost assessments of infrastructure and associated maintenance.

Local Content: SIIP will support the development of infrastructure policies and infrastructure delivery that optimises returns for the local economy, strengthens local industry and industry practices, and workers' skills and opportunities.

Safety and Quality: SIIP will support SIG and industry to strengthen policies and practices for quality construction, building standards, environmental and social safeguards and whole-of-life maintenance.

2.2 DFAT applicable safeguard policies

DFAT has three overarching safeguard policies:

- DFAT Child Protection Policy (CPP)
- DFAT Preventing Sexual Exploitation, Abuse, and Harassment (PSEAH) Policy
- DFAT Environmental and Social Safeguard Policy.

For the purposes of this document, which is tasked with instituting a framework for all environmental and social management requirements, and to avoid confusion regarding the three separate policies, the CPP and PSEAH Policy will be integrated into this Framework and dealt with via the Environmental and Social

Safeguard Policy (under the *Children, Vulnerable and Disadvantaged Groups* safeguard). It is recognised that these are standalone policies with very clear obligations, and set methods of management and reporting, which are integrated throughout SIIP's and Cardno's Program Hub Operational processes. This includes Cardno policies developed in order to meet the requirements of these specific policies, as well as additional organisational safeguarding policies.

2.2.1 DFAT Environmental and Social Safeguard Policy

Investment design and implementation must meet the safeguard principles, which must be considered at each stage of DFAT's aid management cycle, and at each phase of activity development within SIIP.

The safeguard principles underpin the successful application of the five environmental and social safeguards across DFAT's investments, and will be considered in the design and implementation of all activities and projects for SIIP.

Principles

Principle 1: Do no harm

- **Seek to protect the rights, health, safety, and livelihoods of people** including, children, women, indigenous peoples, and other vulnerable or disadvantaged groups. **Maintain the health, diversity and productivity of the environment.**

Principle 2: Identify, assess and manage environmental and social impacts

- **Identify potential environmental and social risks and impacts early in the investment design process**, to ensure they are adequately assessed and managed in investment concepts, designs and implementation.
- Avoid, or where avoidance is not possible, minimise, mitigate or as a last resort, offset or compensate for negative impacts (appropriate implementation of the **mitigation hierarchy**).
- Assess and manage direct and indirect environmental and social impacts of the investment in a way that is **proportional** to potential impacts.
- Manage risks and impacts of the investment through management plans and **monitor and report** on their delivery.
- Consider how the environment or different people groups are affected, including children, people of different genders, indigenous peoples and other vulnerable or disadvantaged groups. The assessment and management of potential impacts must consider these different needs.

Principle 3: Engage effectively with stakeholders

- Be **transparent** about the investment, its risks and impacts in a way that is timely, accessible, and culturally and socially suitable for the affected people.
- **Engage with affected parties and other stakeholders early** in identifying and managing risks and impacts and continue this throughout the investment.
- Ensure consultations include affected parties, are inclusive, free of external manipulation, interference, coercion, or intimidation, and enable **meaningful participation**.

- Provide **accessible and culturally appropriate grievance redress mechanisms** and ensure that grievances are handled promptly, transparently, and without retribution or cost to the party that raised the concern.
- **Disclose information** about the social and environmental performance of aid investments in accordance with DFAT's aid transparency commitments.

Principle 4: Work effectively with partners

- **Comply with partner country safeguard laws and policies** and where possible **build partners' capacity** to develop and implement environmental and social governance systems.
- Work with multilateral, bilateral, non-government organisations (NGO) and private sector development partners to ensure environmental and social impacts are managed in a way that is consistent with this policy.
- Work with partners to manage safeguard risks to **maximise the use of country systems and avoid duplication or unnecessary** safeguard assessment and management planning requirements.

Principle 5: Promote improved environmental and social outcomes

- **Where possible, promote improved environmental and social outcomes** by integrating ecologically sustainable development into aid investments. Improve the implementation and outcomes of aid investments by effectively identifying and managing risks.

Safeguards

The safeguard policies provide guidance to ensure the successful application of the five environmental and social safeguards policies, as well as the principles described above, and to ensure whether there is a need for the ESSP to develop its own specific policies. Consideration of ESSP relevance is highlighted in the following paragraphs. The five safeguard policies in the DFAT ESSP are:

1. Environmental protection
2. Children, vulnerable and disadvantaged groups
3. Displacement and resettlement
4. Indigenous peoples
5. Health and safety.

These are outlined in detail in the DFAT ESSP and in section 3, however from a legislative and regulatory perspective, the DFAT Safeguards do require all DFAT supported programs and activities to show compliance with the Commonwealth *Environmental Protection and Biodiversity Conservation Act* (EPBC Act) and the *Workplace Health and Safety Act* (WHS Act).

2.3 Solomon Islands legislative and regulatory framework

Solomon Islands has a strong and well-established Environment Act and regulatory system for environmental approvals.

2.3.1 Environment Act 1998 and Environment Regulations 2008

This legislation covers SIG's responsibilities and accountable roles, development controls, the control of pollution, and other contents. **All activities carried out under SIIP must comply with any relevant parts of this Act and the corresponding Regulations.**

This legislation sets out a clear process for proponents for the development of infrastructure activities, projects, or other major works, to comply with the Act. While all proposed activities must, as per clause 15, consider the environmental impact, **Prescribed Activities** (defined in Second Schedule of the Act) must pursue the following process. Prescribed Activities most likely to be prepared under SIIP (refer to the Act or to the Environment and Conservation Division (ECD) of Ministry of Environment, Climate Change, Disaster Management and Meteorology (MECDM) if in doubt) include, but are not limited to:

9. Public Works Sector items including:

(a) landfills (b) infrastructure developments (c) major waste disposal plants (d) soil erosion and siltation control (e) hydropower schemes (f) reservoir development (g) airport developments (h) waste management, drainage and disposal systems (i) dredging (j) watershed management (k) ports and harbours.

Key Steps for Environmental Permit

1. Apply to the Director of ECD for prescribed development with sufficient information on the nature of the activity/activities.
2. The Director will advise within 15 days whether the applicant must submit either:
 - a. a development application accompanied by a public environmental report (PER) as per specified contents in the Regulations, and additional information as requested.
 - b. a development application accompanied by an environmental impact statement (EIS) as per specified contents in the Regulations, and any additional information as requested.

Each of the above reports have specific content requirements, consultation / disclosure expectations, and further requirements.

3. On the basis of the PER or EIS, the Director shall examine the report/s and any objections received from public agencies or other stakeholders, and either:
 - a. Issue a consent to the development with or without conditions.
 - b. Refuse consent.

2.3.2 Safety at Work Act and Labour Act

Solomon Islands' main legislation that regulates health and safety at work is the Safety at Work Act 1982. This Act protects the health, safety and welfare of people at work. This protection covers the employee and employer as well as self-employed people and sets a number of requirements on the general duty of employers, employees, manufacturers, suppliers, and other parties, as well as identify and set management controls for dangerous materials, equipment, and/or substances. The Act is also related to the Labour Act, and the Workmen's Compensation Act.

2.3.3 Land and Titles Act 1996 and Customary Land Records Act 1996

Land has major sociocultural significance in Solomon Islands, and plays a part in community relations and power structures, kinship, livelihoods, and subsistence, among many other realms of life. Land impacts, arising from ownership, land acquisition, compensation, displacement and/or resettlement, if inappropriately screened, scoped, or managed can be one of the most significant risks to an infrastructure project in this region.

Registered lands are regulated by the Land and Titles Act (Cap 133), which recognises customary land rights but only in accordance with custom as determined by a court of law. Section 239 states that the manner of holding, occupying, using, enjoying and disposing of customary land shall be in accordance with the current customary usage, but only a court of law can determine a tribe or clan's assertion of customary land ownership (Jonas & Meimana, 2015).

The Customary Land Records Act documents the usage of the customary practices recognised by legislation, and details the processes of registration of land and resolving customary land disputes.

There is evidence to suggest that there are extensive land disputes, and current mechanisms of resolution could be significantly improved. This matter will be further informed by engagement with key stakeholders in SIG.

2.3.4 Other relevant acts for environmental and social management in infrastructure development

An awareness of the following legislation is required when planning the development of infrastructure:

- Town and Country Planning Act
- Mines and Minerals Act (1996) – building materials
- River Waters Act
- Wildlife Protection and Management Act 1998
- Protected Areas Act 2010
- Valuers Act 2009
- Land Surveys Act
- **Ports:** Shipping Act 1998, Ports Act 1956, Fisheries Management Act 2015
- **Roads:** Traffic Amendment Act 2009, which has been changed to Road Transport Act in the Traffic Amendment Bill 2009.

2.3.5 Provincial Government Act and Regional Governance

The Solomon Islands is divided into nine Provinces. Some of the responsibilities that fall under the Provincial Governments, as prescribed by the Provincial Government Act, that may be relevant to SIIP include, but are not limited to:

- Fire services and fire protection
- Waste disposal and cleaning services
- Rest houses, eating houses and similar places
- Parks and recreation grounds
- Markets
- Land & Land Use (within certain parameters)
- Certain responsibilities for Fisheries (freshwater and reef)
- Building Standards.

2.4 Co-financed activities and other development partners

In the Pacific, DFAT partners including the World Bank and Asian Development Bank have cooperatively developed [A Shared Approach for Management of Environmental and Social Risks and Impacts](#) (Pacific Regional Infrastructure Facility, 2021). The tool, accompanied by Secretariat of the Pacific Regional Environment Program's [Strengthening Environmental Impact Assessment: Guidelines for Pacific Island Countries and Territories](#), support safeguard implementation to avoid duplication of effort and use consistent tools and language, particularly useful for co-financed investments.

A range of documents, policies, and guidelines published and used by World Bank, Asian Development Bank, and/or International Finance Corporation (as relevant) can and should be used as supporting guidance, particularly for complex and co-financed projects. Applicability will be decided on an activity and risk basis.

2.5 Risk-based gap analysis

Both SIG legislation and DFAT safeguard policies must be followed, with compliance demonstrated throughout the life of the Program. In some cases, as shown in **Table 1** below, additional proposed actions will be necessary to show compliance with both systems, but the prevailing standard, which will largely dictate processes under this ESMF, is shown in **bold**.

The approach will need to be reviewed in detail for each phase of large infrastructure delivery activities to ensure the specifics of the proposed infrastructure, and any changes in legislation and regulation, are appropriately considered.

Table 1. Risk-based gap analysis of SIG national legislation and regulations

DFAT Safeguard	Solomon Islands Legislation (Prevailing in Bold)	Gap between Safeguard and Legislation	Additional Controls
Environmental Protection	Environment Act	Minor	<ul style="list-style-type: none"> Cwth EPBC Act
Children, Vulnerable and Disadvantaged people	-	Significant (DFAT position would not be legislated)	<ul style="list-style-type: none"> Meet requirements of DFAT safeguard policy GEDSI Strategy
Child Protection Policy	Labour Act Child and Family Welfare Act	Significant (focus differs)	<ul style="list-style-type: none"> SIIP/Cardno Child Protection Policy & Procedure
PSEAH Policy	Criminal Code	Significant (focus differs)	<ul style="list-style-type: none"> SIIP/Cardno PSEAH Policy & Procedure
Displacement and Resettlement	Land and Titles Act Customary Land Records Act 1978 Constitution	Minor (DFAT position provides additional protections and safeguards)	<ul style="list-style-type: none"> Due diligence processes for all land acquisition and/or verification of land ownership prior to infrastructure development
Indigenous Peoples	1978 Constitution Fisheries Management Act 2015 Protected Areas Regulations 2012	Significant (definition and focus differs)	<ul style="list-style-type: none"> Due diligence during screening and scoping
Health & Safety	Safety at Work Act Labour Act	Moderate (some omissions)	<ul style="list-style-type: none"> Cwth Workplace Health and Safety Act For some projects, the World Bank Group/IFC Environmental, Health, and Safety Guidelines (general and activity specific) may need to apply

2.6 Constraints and challenges

SIG has a more mature and developed legislation relating to environmental and social impact assessment and management (environmental permitting) than many other Pacific island nations. However, like many nations in this region, there is significant variability (in Ministries, in departments, in provinces and in various fields) relating to awareness, capacity and capability. Ministry of Infrastructure Development (MID) has a very comprehensive Safeguards Manual; however, it is understood that:

- this is only followed by one department within MID, and other Ministry safeguard activities vary widely in quality and comprehensiveness
- the MID Safeguard Manual was developed by an Asian Development Bank (ADB) technical assistance project, and is adapted to ADB Safeguards Policy, which may limit its applicability across the SIIP portfolio
- the capacity of the Department to implement the Manual has been dependent on ADB technical assistance (funded by DFAT) which may or may not be continued under the ADB's new Land and Maritime Connectivity Project.

There is little known of other agencies' and Ministries' internal safeguards processes. This will be further explored with each of the agencies with which SIIP engages.

Based on this understanding at the time of ESMF preparation, there should be consideration of implementing and/or partner agency capacity and capability as a part of the Terms of Reference for any environmental and/or social impact assessment process for infrastructure delivery (Type 2A and 2B) activities.

2.7 Solomon Islands country context

This section provides some useful context on Solomon Islands' history and the current situation that may be useful to consider in any activities covered by this ESMF.

2.7.1 Cultural awareness

Solomon Islands, like most of the Pacific region, brought together a collection of disparate communities on islands with numerous language groups into a nation-state. While many have a strong sense of identity as the indigenous people of Solomon Islands, there are also significant elements of identity that can arise from family groups, language groups, home villages, islands and/or provinces, religious denominations, as well as individual history and experiences.

Cultural awareness is about respecting others' cultures as well as our own. It is simply about helping us understand how we can best adapt our approaches, thoughts, and decisions to ensure we create positive outcomes in cross-cultural interactions. Someone's cultural awareness is their understanding of the differences between themselves and people from other countries or other backgrounds, especially differences in attitudes, values, beliefs, and perceptions. It is the ability of standing back from we and becoming aware of our cultural values, beliefs, and perceptions.

All activities led by SIIP require a level of cultural awareness, and this begins with building a baseline of understanding. Section 2.7.2 presents a very brief introduction to the history of Solomon Islands. Section 2.7.3 introduces some broad cultural protocols for community interaction, but activity leads and SIIP team members are encouraged to further localise interactions as appropriate.

2.7.2 A brief history of Solomon Islands

There is some suggestion that the Islands that came to be named "the Islands of Solomon" by the Spanish explorer Alvaro de Mendana de Neira in 1568 were first initially settled by people from New Guinea up to 30,000 years ago, but larger settlements began to be established approximately 2000BC. There is significant evidence of pre-European culture across the Islands, including the Bao shrines and Nusa Roviana. The linguistically diverse communities across the islands would have occasionally interacted with people across the region for trade and resources over the centuries, evidenced by archaeological finds such as Lapita pottery on Santa Cruz. Interactions with Europeans increased as explorers, began to take an interest in the region, and increased swiftly in the following centuries.

Naval and commercial shipping routes began to pass through more frequently in the 1800s as nearby Australia was settled. Missionaries became active in the region in the mid-1800s, led by the Anglicans and the Roman Catholics but soon followed by other denominations. In the late 1800s, it's now acknowledged that many people across the Pacific were being exploited for their labour, being taken to Fiji and Australia to work plantations, often under false pretences or threats of violence. These activities have been referred to as "*blackbirding*".

The British and Germans colonised the Solomon Islands in the late 1880s, but after some disputes and negotiations, the British Solomon Islands protectorate was established in 1893, and colonial rule began a few years later. The protectorate largely seen as benevolent, however Solomon Islanders were treated harshly, and the interests of the Europeans (largely utilising the resources of the islands through planting and trading) were prioritised over those of the locals. This often sparked violent and tragic episodes, such as that which occurred with the Kwaio on Malaita in the 1920s.

In 1942, Japanese forces occupied a part of the Solomon Islands and significant fighting occurred over the subsequent three years between the allies, led by the United States, and Japanese forces, including the

battle of Guadalcanal. The war significantly changed life in Solomon Islands, and in subsequent decades a form of democracy began to be established through electoral processes, although it wasn't without its challenges. Independence was achieved on 7 July 1978, with Sir Peter Kenilorea the first Prime Minister, but retaining membership in the Commonwealth with the Monarchy remaining the head of state.

Tensions and RAMSI

In 1998, the Solomon Islands experienced what was referred to as 'the tensions'. Ethnic tensions could be traced back to the aftermath of the war, displaced landowners, and ethnic tensions between local Gwale people on Guadalcanal and Malaitans who had informally settled in and around Honiara, however these were complex matters, compounded by a number of other factors. In 2000, Manasseh Sogavare was elected, however conflict continued to brew and increasing challenges to law and order were experienced. The [Townsville Peace Agreement](#) was introduced in 2000 where ethnic militants signed the agreement for peace between Malaita Eagle Force and the Istabu Freedom Movement from Guadalcanal however, one important militant Harold Keke and his group refused to sign the agreement splitting Guadalcanal. This resulted in a joint operation force to capture him with the conflict moving to weather coast of Guadalcanal. In April 2003, the Prime Minister of Solomon Islands Sir Allen Kemakeza made an urgent request for international assistance through responses from Pacific Island Forum (PIF) countries led and funded by Australia and New Zealand with members from the forum countries.

Eventually in July 2003 the Regional Assistance Mission to Solomon Islands (RAMSI) or Operation Helpem Fren mission was mobilised to Solomon Islands with the participation of fifteen countries from the Pacific Region. RAMSI's mission was to strengthen the RSIPF through capacity building, reintroduce firearms to the RSIPF and prevent family violence. It had significant successes restoring peace, law, and order and capacity building within the civil service, but the mission was not without criticism, most vocally from then former (and now current) Prime Minister Manasseh Sogavare.

Following the April 2006 election of Snyder Rini as Prime Minister, riots broke out in the capital of Honiara on the basis of accusations of corruption and international influence of the election results, with Chinese residents heavily targeted as a result. While PM Rini resigned eight days after his election, RAMSI Participating Police Force (PPF) received reinforcements from 15 Pacific nations. RAMSI concluded in 2013, with assessments finding that the security situation had been stabilised.

2021 Unrest

On Wednesday 24 November 2021, a planned peaceful protest by people from Malaita Province expressing dissatisfaction with the current government of Solomon Islands turned violent with around a crowd of 1000 people stoning and burning one of the leaf huts at the National Parliament house. As Police worked to disperse the crowd, some violence and looting erupted, resulting in significant damage over the following days. A range of influences and contributing factors have been identified, including a lack of progress on the implementation of the *Townsville Peace Agreement*, and disputes relating to national and provincial government relations with Taiwan and China.

Prime Minister Mr Sogavare requested assistance and support was deployed from Australia, New Zealand and Papua New Guinea. A motion of no confidence was issued against the prime minister but was defeated in Parliament. Impact assessments as at December 2021 have identified 60 buildings in Honiara and surrounds destroyed by fire, and the Central Bank of Solomon Islands has estimated riot impact costs have reached \$534 million.

2.7.3 Cultural protocols

Community engagement protocols prior to visiting any community/village in the Solomon Islands.

- Contact chief/leader of the village a week before visit to get their consent. State clearly the main purpose of the meeting/visit to the community.

- Inform CCDR/GEDSI coordinators and visit with them
- Meet with chief/leader upon arrival
- Introduce yourself: name, company name and purpose of visit
- Hold the meeting
- Allow chief/village people time to talk
- Appreciate village people for their time, effort, and resources. They are the experts in village life.

Kastom is a Solomon Island term that refers to shared tradition as well as contemporary ideas and institutions that are embedded in indigenous life.

Approaching village communities in the Solomon Islands

Solomon Islands has a diverse culture and traditions. Each Island/province has its own unique “Kastom” ways of welcoming guests to their villages. However, there are common cultural protocols which are applied across the diverse cultures in the context of the Solomon Islands.

- When in the village, respect the village rules and taboo places. Do not enter taboo sites or other restricted sites.
- Dress code must be appropriate and modest. E.g., Males must not wear casual wear. Females wear skirts or dresses that cover their knees.
- While in the Village, always ask for permission before doing any activity or going anywhere. It is best not to move around the village without someone from the village accompanying you.
- Greet everyone and be friendly.
- Do not go in restricted areas, taboo sites, kastom houses, and isolated places in the forest, along the river, and up the hills (especially at night) unless you have explicit permission and someone from the local community (preferably a community leader) with you.

Greeting and talking to members of the local community

What to do

- Greeting people in a friendly and respectful manner.
- Shaking of hands is required when meeting Village Chiefs and Leaders.
- Properly introduce yourself, your job and your company.
- Speak in English or Solomon Pijin if you can.
- Smile and be friendly.
- Do not be offended by people not looking you in the eye, culturally it is a sign of respect and they are taking note of what has been said. sometimes this is misinterpreted as reluctance to meet and engage with personals arriving into communities.

What NOT to do

- Do not make unnecessary jokes or use profanity during conversation.
- Do not speak with members of the opposite sex alone, this may be misinterpreted by the community. If you must speak with individuals, seek to have someone of the opposite sex from your team with you, or a number of community members present, before commencing with your intended activity. It is recommended that wherever possible female team members undertake engagement with women, and men undertake engagement activities with men, however either can engage with mixed groups.
- Do not ask sensitive/personal questions e.g., “are you married/divorced?” especially in public. Some people might find it offensive or it may be perceived as flirting, especially to women. If these are important questions for a survey, wherever possible try to have a mixed pair undertaking surveys, or undertake the survey in the presence of parents or spouses (or other family or community members).
- Always have a local community male/female representative present with you during the visit, especially when moving around. They do not need to be present for surveys, as you discuss personal information, but should accompany you around to the households. Try to arrange this well in advance with community leaders.
- Approach and communicate in a respectable manner.
- Do not press the hands strongly when shaking the hands.

Dress Code

What to wear

- Decent, modest clothing:
 - Dress/skirt for women & girls
 - Trousers/long pants for men & boys

What NOT to wear

- In some of the villages girls and women are not allowed to wear trousers/shorts
- Tights/clothes that left the body exposed is unacceptable.

Socially and culturally appropriate behaviours

During death/funeral in the community

- All construction works or any other activities within or near the community must be stopped.
- Must get consent from the community chief/Leaders and family members of the deceased before start working.
- Construction activities must be conducted in a quiet manner, no unnecessary loud noises, laughing or shouting.
- Pay respect by attendance at the funeral.
- Present gift or any form of support to the community as a sign of respect and support during a funeral.

Religious observance

- No activities can be conducted within a community on their respectful day of worship i.e., Sunday or Saturday. This should be integrated into any contractor's code of conduct and project programming.
- if you are attending church services take note of seating arrangements. Males and females may be seated separately in the church. If unsure, obtain guidance from community leaders on where best to sit.
- Get prior consent from community Church leaders, Chiefs and Elders before construction activities or community awareness programs can be conducted on Sundays or Saturdays, depending on each community. There may also be hours that are inappropriate (e.g. evening devotion) for any loud activities.
- Sunday or Saturday Church goers must not work on their respectful day of worship.

3 Impact Screening

A Risk and Safeguard Screening Tool for the Program was completed at the time of design (November 2020) and is attached in Annex B. The following section briefly summarises the key potential risks and impacts relating to each of the DFAT ESSP Policies, based on three ESMF Activity Types introduced in section 1.4.1.

3.1 Environmental protection



Environmental degradation caused by poorly planned or implemented aid investments can undermine development outcomes by harming the people the investments are intended to help. They also increase the vulnerability of communities to disasters and the impacts of climate change. The protection and conservation of natural resources and ecosystems is integral to the economic prosperity and sustainable development of any country, especially those in the global south.

When assessing and managing environmental and social risk and impacts, DFAT policies require that due consideration is given to the protection of ecosystems and their constituent parts; climate, natural systems and processes; natural and physical resources; qualities and characteristics of locations, places and areas;

and heritage values of places including social, economic and cultural aspects of the above, including those related to indigenous people.

SIIP ESMF Activity Type	Key Risks & Impacts to Environmental Protection	Potential Impact Level before Controls
Activity Type 1: Program Hub Operational Activities	SIIP operational activities will have little to no environmental impact, however some consideration should be given to office operations energy and water efficiency, materials, and waste management.	Low
Activity Type 2A: Infrastructure Delivery Activity Inception	No negative impacts on environment from these Program activities, which seek to improve monitoring and learning, enhance local capabilities, and enhance environmental protections and resilience. Applied in line with this ESMF, these inputs will have net benefit for environmental protection.	Low
Activity Type 2B: Infrastructure Delivery Activity	All physical infrastructure delivery works will require careful application of good practice impact assessment and management. Solomon Islands has robust environmental legislation and permitting processes, and SIIP activities will be required to follow and comply with the Environment Act.	High

3.2 Children, vulnerable and disadvantaged groups



In order for aid investments to benefit people and communities, it is integral that due consideration be given to the development needs of children, vulnerable and disadvantaged groups, including women.

DFAT policies endeavour to protect people, especially the most vulnerable, from any form of sexual exploitation, abuse and harassment in any of its work. When assessing risks and impacts, SIIP will identify individuals and groups that may be affected, engage in a way that is relevant to the different interests and needs of potentially affected groups, seek to avoid negative impacts on those identified groups, implement measures so that negative impacts do not fall disproportionately on those groups, and finally avoid unintended consequences.

The SIIP GEDSI team will provide significant guidance on SIIP activities to ensure this safeguard is consistently met through design, informed participation, and monitoring.

Child Protection Policy

DFAT has a zero-tolerance approach to child exploitation and abuse. Projects funded by DFAT must safeguard children in aid investments through the application of the CPP and the consideration of potential impacts on children from aid investments in screening, impact assessment and management plans. These activities help ensure that the delivery of an aid investment does not expose children to harm or the risk of abuse and exploitation.

Preventing Sexual Exploitation, Abuse, or Harassment (PSEAH) Policy

DFAT does not tolerate sexual exploitation, abuse or harassment (SEAH) of any kind. Both DFAT, and Cardno, have robust PSEAH policies which signifies a heightened commitment to enhancing accountability, improving support for people affected, and driving cultural change through strong leadership.

SIIP ESMF Activity Type	Key Risks & Impacts to Children, Vulnerable and Disadvantaged People	Potential Impact Level before Controls
Activity Type 1: Program	SIIP and Cardno proactively abide by the two complementary policies of the DFAT ESSP (the DFAT Child Protection Policy (CPP), and the DFAT Preventing Sexual	Low

Hub Operational Activities	<p>Exploitation, Abuse, and Harassment (PSEAH) Policy) with consistent training, clear reporting procedures, and investigation processes. Cardno ID have a division wide Safeguard Policy and PSEAH procedure in addition to the Code of Conduct, which are required to be acknowledged by new personnel along with the Code of Conduct. There is also mandatory training (annual). The PSEAH procedure outlines a number of reporting mechanisms including via Cardno’s safeguard lead along with alternatives.</p> <p>Cardno implement a Child Protection Policy, Child Protection Procedure and Child Protection Code of Conduct. All program personnel are contractually required to read, acknowledge and comply with the policy, the procedure and the code of conduct. Cardno’s Sub-contractors are also contractually required to comply with the Child Protection Policy and reporting procedures in line with our obligation to pass on these responsibilities to downstream partners.</p>	
Activity Type 2A: Infrastructure Delivery Activity Concept	<p>SIIP has been designed to proactively integrate cross-cutting themes of GEDSI, CCDR, local content, and capacity development across all its activities. There will be net benefit to vulnerable and disadvantaged people through these activities, however inputs or proposed activities will be carefully screened to identify any atypical risks or potential impacts.</p>	Low
Activity Type 2B: Infrastructure Delivery Activity	<p>Due to the nature of the infrastructure works, there is a possibility of incidental contact and impacts on children, vulnerable and disadvantaged groups in communities in which activities and infrastructure development occur. These will be considered, assessed and mitigated to the extent possible through the activities identified in this ESMF, not least of which is open, transparent, and clear communication and engagement with communities, these vulnerable groups, and the groups and organisations that represent their interests.</p>	High



3.3 Displacement and resettlement

Building economic or social infrastructure may lead to the displacement of communities, including poor or other vulnerable groups, and the physical and/or economic displacement may lead to prolonged hardship, poverty, and/or psycho-social impacts. If well-planned and implemented, resettlement could ensure that displaced communities share in the benefits of development. DFAT’s policy applies to the following investment actions:

- The compulsory acquisition by a partner government of land rights or land use rights in accordance with the legal system of that country
- A partner government taking possession for development purposes of public land occupied or used by others
- Management and conservation plans or design measures that restrict access to land or other natural resources
- A partner government legally designating a park or protected area that leads to involuntary restrictions on access to land or natural resources
- Humanitarian assistance in reconstruction and recovery
- Technical assistance supporting the design of investments that will require land acquisition or restrictions on access to land or other natural resources.

SIIP ESMF Activity Type	Key Risks & Impacts relating to Displacement and Resettlement	Potential Impact Level Before Controls
Activity Type 1: Program Hub Operational Activities	<p>SIIP operational activities will have little to no impact on displacement and resettlement.</p> <p>Any land acquisition undertaken for the Program (e.g. office leases) will consider sufficient land due diligence to ensure land payments are going to the appropriate / recognised land owners as per SIG legislation.</p>	Low

SIIP ESMF Activity Type	Key Risks & Impacts relating to Displacement and Resettlement	Potential Impact Level Before Controls
Activity Type 2A: Infrastructure Delivery Activity Concept	SIIP operational activities will have little to no impact on displacement and resettlement. The cross-cutting team's input on the infrastructure delivery activities will further reduce displacement and resettlement risk and impacts.	Low
Activity Type 2B: Infrastructure Delivery Activity	SIIP's investments in infrastructure will almost certainly involve some potential risks and impacts relating to land use, access, and physical or economic displacement. This will be a focal area of Safeguards practice for the Program, with careful management through this ESMF and related processes. It is not the intention of SIIP to engage or manage any land ownership tasks. Risks and impacts to community lands, homes, assets, and/or livelihoods identified later in the project process, due to Insufficiently conducted screening and/or scoping phases, can lead to significant cost and time delays in the delivery of infrastructure.	High



3.4 Indigenous peoples

Aid investments need to provide opportunities to assist indigenous peoples to overcome social and economic disadvantages and marginalisation by increasing rates of inclusion to promote the wellbeing of indigenous peoples around the world. Social, economic and political power imbalances as well as spoken language may prevent indigenous peoples' equitable participation and access to benefits resulting from aid investments. In addition, indigenous peoples may have diverse concepts of development based on traditional values, visions, needs and priorities.

DFAT's Indigenous Peoples Strategy 2015-2019 recognises the importance of overcoming social and economic disadvantages by providing a framework for DFAT to work with its partners to advance and promote the wellbeing of indigenous peoples.

For the purposes of Australia's aid program overseas, DFAT adopts a definition of 'indigenous peoples' that is largely accepted by the international community, as set out by former UN Special Rapporteur Martinez Cobo (cited in the DFAT ESSP) which is *"Indigenous communities, peoples and nations are those which, having a historical continuity with pre-invasion and pre-colonial societies that developed on their territories, consider themselves distinct from other sectors of the societies now prevailing on those territories, or parts of them. They form at present non-dominant sectors of society and are determined to preserve, develop and transmit to future generations their ancestral territories, and their ethnic identity, as the basis of their continued existence as peoples, in accordance with their own cultural patterns, social institutions and legal system."*

This safeguard is one of the more complex safeguard policies to interpret, understand, and implement due to the language, which is a commonly used legitimate descriptor for a range of peoples across the world. The safeguard has been developed in order to protect the most vulnerable communities in the face of development. Great care must be taken in the identification of 'indigenous peoples' as defined in this policy, through informed engagement and specialist advice, in order to meet the intent of the safeguard.

Many people and communities throughout the world may identify as indigenous to an area or region. They may be customary landowners, and have strong connections to lands or cultural practices. However, these characteristics are common across the world, and are not, in isolation, indicative of the "indigenous peoples" that this safeguard has been designed to protect. The *Environmental Protection* (section 3.1) safeguard contains requirements for careful assessment and mitigation of environmental, social, and cultural impacts for all communities affected by a proposed project, including cultural heritage considerations. The *Displacement and Resettlement* safeguard (section 3.3) provides clear protections relating to land, land use, and additional protections for customary (and other) landowners. The additional controls under the *Indigenous Peoples* safeguard are elevated into a separate safeguard policy to, among other reasons, ensure that vulnerable indigenous groups are not disadvantaged due to a lack of exposure to social norms,

technology, legal and institutional processes, or development impacts that perhaps those who live and work in mainstream society may be at least familiar with.

Many of the principles that are applied in this safeguard for the protection of indigenous peoples could be considered more broadly applicable good international industry practice regardless of the ‘indigenous’ or other status of the people and communities potentially impacted by a project or activity. As a result, most of these principles can be implemented where practical and appropriate for mainstream society communities. However, full compliance with the safeguard, especially in complex environments, can be burdensome, costly, and contribute significant delays to project activities.

SIIP ESMF Activity Type	Key Risks and Impacts relating to Indigenous Peoples	Potential Impact Level Before Controls
Activity Type 1: Program Hub Operational Activities	SIIP operational activities will have little to no impact on indigenous peoples. The program will ensure inclusive and non-discriminatory communications and processes throughout operational activities	Low
Activity Type 2A: Infrastructure Delivery Activity Concept	SIIP operational activities will have little to no direct impact on indigenous peoples. The cross-cutting team’s input on the infrastructure delivery activities will further reduce risk and support the timely identification of impacts to indigenous peoples.	Low
Activity Type 2B: Infrastructure Delivery Activity	Most people within Solomon Islands, despite being Indigenous Solomon Islanders in the general sense of the term, do not meet the DFAT-accepted definition of Indigenous Peoples as written to convey the safeguards intent. As projects will predominantly be in areas inhabited by mainstream society, there is minimal risk or likelihood of impacts on Indigenous Peoples as defined by the safeguard policy. However, that is not to say that Indigenous Peoples or groups may be identified and affected by SIIP activities. It is crucial that all SIIP activities are appropriately screened for the presence of indigenous peoples or ethnic minorities, and if so, careful management will be applied using ESMF and related processes. Risks and impacts to indigenous peoples identified later in a project process, due to the screening and/or scoping phases being insufficiently conducted, can lead to significant cost and time delays in the delivery of infrastructure.	Medium

3.5 Health and safety

Under the Commonwealth *Workplace Health and Safety Act*, DFAT has an obligation to ensure the health and safety of workers and others put at risk due to work carried out on behalf of the Department which may apply to aid investments. DFAT ESSP seeks to protect the health and safety of specific groups including children, vulnerable and disadvantaged groups. The World Bank EHS Guidelines (both General and the activity-specific guidelines) can provide an additional level of guidance and control for larger or higher risk activities, and is encouraged to be used in procurement and contracts.

SIIP ESMF Activity Type	Key Risks & Impacts relating to Health and Safety	Potential Impact Level Before Controls
Activity Type 1: Program Hub Operational Activities	SIIP’s investments in infrastructure will almost certainly involve some potential risks and impacts relating to the health and safety of workers and communities. However, every activity, even those carried out within corporate settings or those absent of community interaction or construction, will require some consideration of health and safety, and this is embedded in both SIIP and Cardno operational processes, and the processes outlined in this ESMF. Cardno has corporate requirements	Low

SIIP ESMF Activity Type	Key Risks & Impacts relating to Health and Safety	Potential Impact Level Before Controls
	<p>which also require routine compliance, recognising that audits are a part of the Cardno Quality Management System.</p> <p>Visits to sites and offices uncontrolled by SIIP/Cardno, greenfield sites, and travel within Solomon Islands will have some residual risk requiring specific controls or protocols to mitigate risk, which will include approved COVID-19 controls.</p> <p>COVID-19 now presents unprecedented challenges that have to be carefully considered and managed in a way that is commensurate with risk. The SIIP COVID-19 WHS Plan details the processes and procedures that must be followed, however this will evolve with the pandemic.</p>	
<p>Activity Type 2A: Infrastructure Delivery Activity Concept</p>	<p>Visits to sites and offices uncontrolled by SIIP/Cardno, greenfield sites, and travel within Solomon Islands will have some residual risk requiring specific controls and/or protocols to mitigate risk.</p>	<p>Medium</p>
<p>Activity Type 2B: Infrastructure Delivery Activity</p>	<p>Activities involving the construction and/or operation and maintenance of infrastructure, have the potential to expose not only workers, but also communities and local people, to health and safety risks. These can exacerbate underlying environmental and/or social vulnerabilities experienced by communities or by children, disadvantaged, or vulnerable people. SIIP is obligated to abide by the Safety at Work Act, and Australia's Workplace Health and Safety Act (Cth). Additional guidance, such as the World Bank Group/International Finance Corporation Environmental, Health and Safety Guidelines (General and activity-specific) may be referred to for some activities.</p> <p>The key controls for ensuring contractors are sufficiently addressing health and safety risks and impacts to workers and community members will be procurement processes, contracts, capacity building, and supervision.</p> <p>DFAT has a policy on managing asbestos risk (asbestos policy) which prohibits the use of asbestos-containing materials in new aid investments and requires management of any existing asbestos-containing material. If any activities include any infrastructure works, appropriate asbestos screening must be carried out, including on the presence of asbestos in existing infrastructure, and/or in materials being supplied.</p>	<p>High</p>

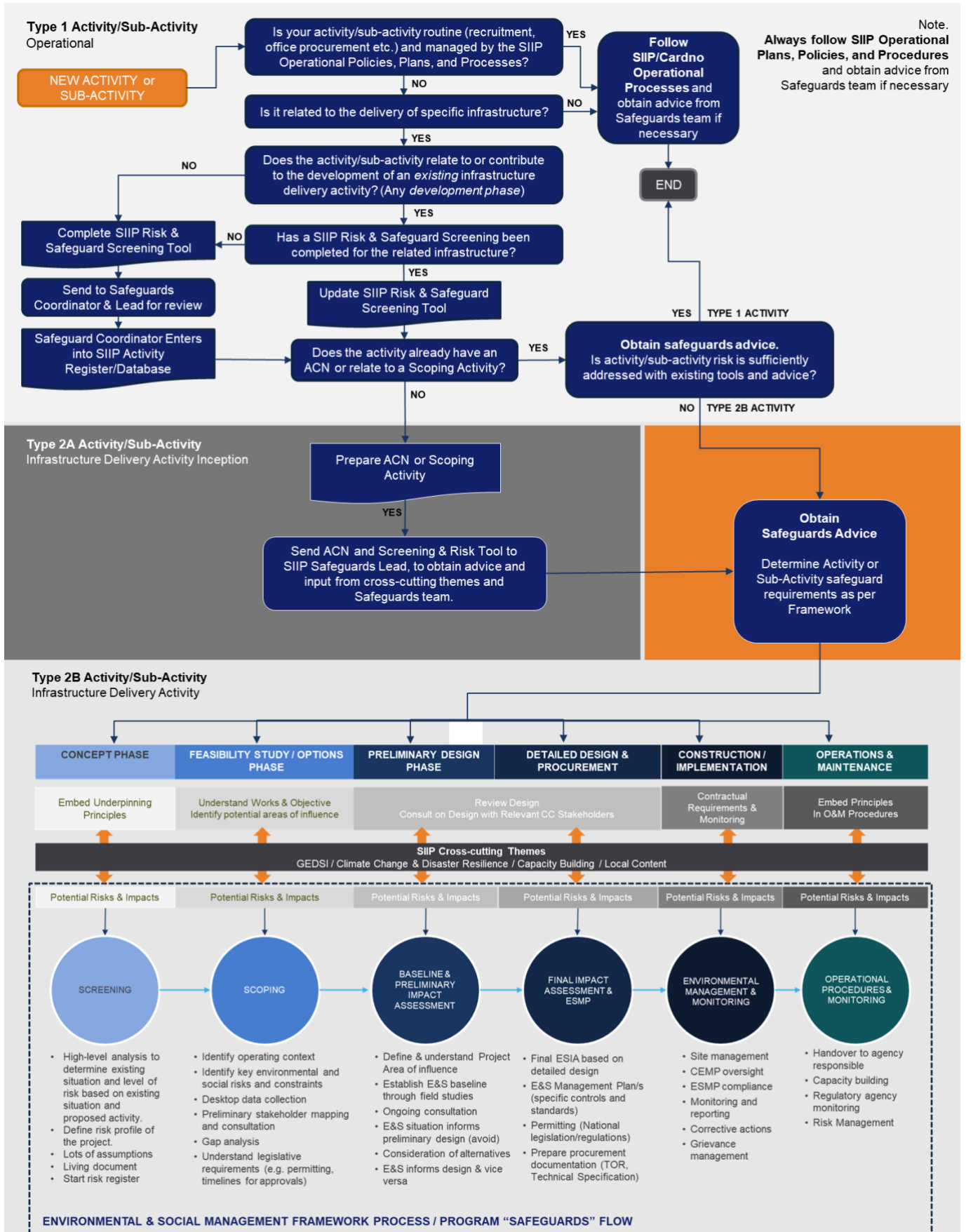
4 Impact Assessment and Mitigation Process

The Impact Assessment and Mitigation process is based on the three **ESMF Activity Types** introduced in section 1.4.1 on page 7 of this ESMF.

Guidance: If you are unsure which category your activity/ies fall under, please consult the Safeguards Coordinator or the Climate and Community Manager or use the grm@siip.com.sb email address to submit your query.

The use of this Framework is shown in the Flowchart in **Figure 2**.

Figure 2. SIIP ESMF flowchart



4.1 Activity Type 1: Program Hub operational activities

As noted above, Type 1 activities apply to all functional areas of SIIP.

Relationships & Partnerships	Delivery of Infrastructure	Performance & Risk Management	Corporate Services
Governance & Management	Policy & Technical Advice	Capacity Building & Local Content	GEDSI
			CCDR & Environment

All activities carried out by SIIP, SIIP personnel, and/or consultants and contractors working on behalf of SIIP must adhere to the Activity Type 1 steps.

1. **Routine and standard processes:** relating to operations and general technical advisory provision (i.e. not relating to a specific infrastructure activity e.g. policy, regulatory) in line with the SIIP Operations Manual, this ESMF, cross-cutting (GEDSI & CCDR) strategies, and the contract. The Quality Management System, and the Cardno Safeguarding, Child Protection, PSEAH, Zero Harm, and Cardno Way policies and procedures embed the principles of all of the typical risks encountered within operational development program activities.

Routine and/or standard activities may include, but are not limited to, program/project management tasks, recruitment, human resources, procurement, and in-country activities (including travel and transport, small meetings with SIG stakeholders, minor unplanned interactions). Controls include:

- Human Resources: Criminal Record check, Working with Children check, Supplier due diligence, reporting mechanisms (e.g. whistleblower hotline) and Induction (and scheduled refresher) training on PSEAH, Child Protection, Safeguarding, Health and Safety (Zero Harm).
- Procurement: Supplier due diligence, safeguard requirements (and modern slavery obligations) included in downstream suppliers' contracts.

2. **For all non-routine operational activities:** Carry out SIIP Risk and Safeguard Screening and submit to the Safeguards STA (and/or Climate and Community Manager), who will review for completeness, and pass on to the Safeguards Coordinator who will enter the Activity into the Safeguard Screening Register and save on to the SIIP SharePoint. These will be reviewed fortnightly by the Safeguards STA. Examples of non-standard operational activities include:

- Community consultation (unrelated to a specific piece of infrastructure)
- Training workshop on site at a community or in a Government building
- Hosting Ministers or other dignitaries at a project site (e.g. ground-breaking, Minister visit).

Any “non-routine” activities that might happen regularly can be screened once, and referred to in future activities, however these activity screenings should provide some detail on the variables (e.g. participants, location, timing) that the Activity Lead should consider when planning future occurrences.

4.2 Activity type 2A: infrastructure delivery activity inception

These activities are specific to specialist functional areas under SIIP (listed below), whose inputs relate to a specific piece of infrastructure that will be delivered (whether by the Program or through other mechanisms).

Relationships & Partnerships	Delivery of Infrastructure All preparatory documentation	Performance & Risk Management (including MEL) Key Documents: MEL Plan, Risk Registers	Corporate Services	
Governance & Management	Policy & Technical Advice	Capacity Building & Local Content Key Documents: Capacity Building Strategy, Local Content Strategy	GEDSI Key Documents: GEDSI Strategy	CCDR & Environment Key Documents: ESMF, CCDR Strategy

1. **ACN or Scoping Activity (SA):** Develop an ACN and liaise with each of the cross-cutting theme leads to ensure the ACN includes relevant considerations. At this stage, the Activity Lead will undertake **SIIP Risk and Safeguard Screening**, including commencing the Activity Risk Register tab, with input from the cross-cutting theme leads and the Safeguards team. Once drafted, this will be submitted to the Safeguards Coordinator. These Screenings will be entered into the Safeguard Screening Register by the Safeguards Coordinator which is saved on the SIIP SharePoint and reviewed regularly by the Safeguards STA and Safeguards Lead.
2. **Cross Cutting Functional Area reviews and guidance:** At each new stage of infrastructure development or activity, the Activity Risk and Safeguard Screening must be updated in Sharepoint (which will notify the Safeguards Coordinator and STA of a change in that document for their review). The Activity Lead **must** liaise with each of the cross-cutting theme leads and specialists. The Activity Lead must be guided by the Activity Risk and Safeguard Screening, as they progress through infrastructure development, regardless of phase. The leads can ensure cross-cutting and environmental and social risk strategies are integrated into the approaches, and that appropriate consideration has been given to resourcing (human, material, and financial) to ensure all requirements are appropriately addressed and accounted for, e.g. Specialist studies, monitoring and data collection, integration of GEDSI or disaster resilience principles within a Design procurement technical specification/Terms of Reference.

The Cross-cutting theme leads have the responsibility to ensure the principles in their leading plan or strategy are integrated and accounted for in the current and future phases of works by the Activity Lead/s.

Note: It is understood that some activities will come into SIIP's management comparatively developed. These will be dealt with on a case-by-case basis, but at a minimum, the documentation must have been reviewed by the cross cutting functional area/s and include **SIIP Risk and Safeguard Screening**.

4.3 Activity type 2B: Infrastructure delivery activities

Type 2B activities are defined as those relating to specific pieces of infrastructure being developed (or advised on) via the SIIP Program Hub, regardless of their phase or progress. These activities must initially be subject to the actions under Type 2A, and will have a corresponding ACN/SA and completed SIIP Risk and Safeguard Screening Tool.

Relationships & Partnerships		Delivery of Infrastructure		Performance & Risk Management	Corporate Services
Governance & Management	Policy & Technical Advice	Capacity Building & Local Content	GEDSI		CCDR & Environment

The Environmental and Social Management components in support of infrastructure delivery are based on progressing through a typical project development process, as shown in **Figure 3**.

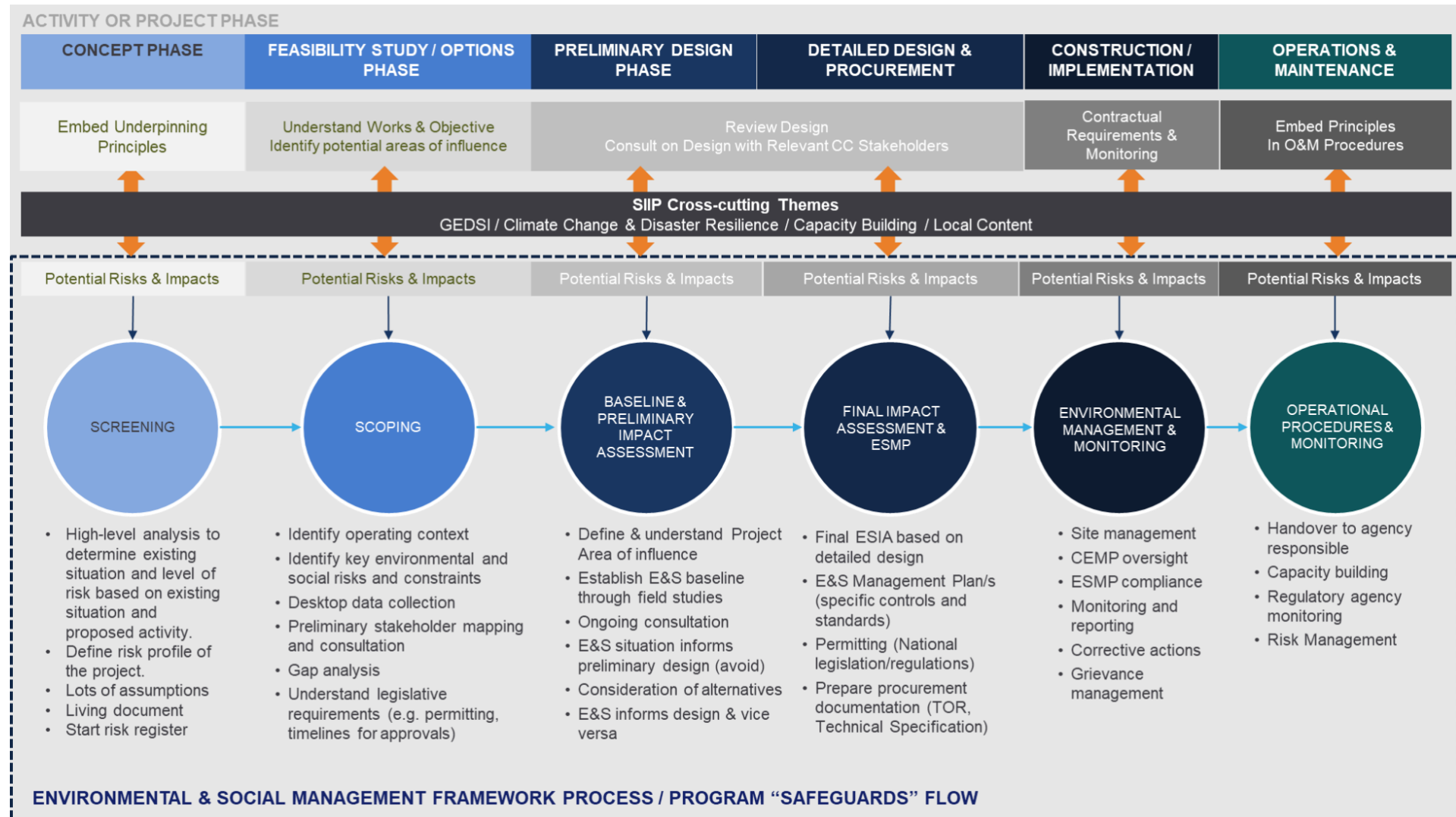
The process will vary based on the risks, and the safeguard requirements, identified in the ACN/SA and the corresponding SIIP Risk and Safeguard Screening tool, the cross-cutting strategy inputs, and SIG and DFAT expectations and limitations.

For these activities, use the **SIIP Safeguards Procedures**, presented as flowcharts with supporting templates, in **Annex A**.

Where SIIP activities trigger the Environment Act, as a *Prescribed Activity*, the appropriate permit process (as described in the legislation and Regulation) will be followed to ensure the compliance of the Program with SIG legislative requirements, as per section 2.3.1.

ESIA/PER reports may only be required under the Environment Act if the activity is a prescribed development as defined by the Act. However, in order to meet DFAT ESSP, similar impact assessments and related studies may need to be undertaken on infrastructure activities that are not defined as prescribed developments but are nonetheless likely to cause any environmental or social impacts. The way this will occur will vary, depending on the context, the activity, the requirements and so the Safeguards team must be kept involved throughout the development of 2B Activities, and be made aware of any and all changes to scope or circumstance.

Figure 3. Indicative process flow for infrastructure delivery activities (activity type 2B)



5 Safeguards Engagement and Information Disclosure

Key principles underpinning communication and consultation for the Program are outlined below. Stakeholder engagement, community engagement, and processes for disclosure must:

- be considered by the Activity lead for each activity.
- be documented in a standalone briefing or plan (commensurate with activity size and scope) for all infrastructure delivery (Type 2B) activities.

5.1 Key principles for safeguards engagement

- **Engage effectively with stakeholders** (Principle 3, DFAT ESSP) *Refer to Section 2.1 for detail but of most importance:*
 - Be **transparent** about the investment, its risks and impacts in a way that is **timely, accessible, and culturally and socially suitable** for the affected people. This includes advanced notice (and seeking permission) for any activities that may occur in their communities such as field work, surveys, and consultation. Do not time activities in a way that interferes with community activities or excludes certain parties from attending e.g. evening devotion, parts of the day when people are working in gardens etc.
 - Establish appropriate protocols with community leaders prior to engagement.
 - Ensure consultations include affected parties, are **inclusive**, free of external manipulation, interference, coercion, or intimidation, and **enable meaningful participation**. For example, consider holding different consultations with women, men and youth to enhance voice and participation.
- **Nothing about us without us (SIIP Design)**
 - Involve all people and parties affected by a proposed activity at all stages as soon as permitted/approved, but particularly in the impact assessment process and in the development of mitigation strategies. Local, affected people know more than you.
 - Different groups use resources and physical spaces in different ways, ensure that different groups have opportunities for focused conversations to properly understand impacts of a proposed or actual activity.
 - Provide information on the Grievance Redress Mechanism to all affected people and stakeholders at earliest engagement opportunity, including tailored culturally and socially appropriate processes for lodging grievances if required (e.g. in communities with no telephone or internet connection).
- **Fostering empowerment (SIIP Design)**
 - Going beyond compliance and ‘do no harm’, to fostering empowerment. This will require addressing norms, attitudes and the lack of information that otherwise limits the empowerment of women and people with disabilities but extends to all communities that may be affected by an activity (e.g. landowners, community members, small businesses, informal settlers).
 - Seek to identify ways in which “affected people” can engage with the investment in a way that is beneficial to them, and seek to integrate this into design and management.
- **Keep records of all engagement activities and communications relating to activities.**
 - Any and all consultations held by any SIIP team member, and/or those led by someone else relating to a SIIP-supported activity, must be documented using a gender-disaggregated **attendance sheet** and **simplified meeting record**.
 - A local language and/or Solomon Islands Pijin speaker (from the SIIP team or a development partner/government agency) must be present at all meetings to be able to support any engagement undertaken in English (if unable to be fully carried out in Pijin) and take notes of comments, questions, or issues raised.
- **If and when in doubt, refer to SIIP Climate and Community Manager.**

5.2 Key stakeholders

The key stakeholders in relation to safeguards for SIIP are outlined below, along with their initial levels of interest and influence (with regards to Safeguards). Each activity will also have specific stakeholders that will also be identified and considered, particularly for infrastructure delivery activities.

Table 2. Key stakeholders

Stakeholder	Type	Role in SIIP	Interest	Influence	Management Approach
SIIP Steering Committee, comprising: - The Office of the Prime Minister and Cabinet - Ministry of National Planning and Development Coordination - Ministry of Finance and Treasury.	SIG Decision Maker	Investment and Activity Decisions/ Approvals on behalf of SIG	High	High	Priority Seek approval and involve in decision-making
Australian High Commission (DFAT), Honiara	Donor / Development Partner	Donor Approver for Contractual matters Adviser on sensitivities related to the bilateral relationship	High	High	Priority Involve in decision-making and seek approval where required
Relevant Ministry (related to each Activity)	SIG delivery partner	Various	High for 'prescribed activities'	High for 'prescribed activities'	Work together on prescribed activities to ensure safeguards and Ministry objectives are met
Environment and Conservation Division, Ministry of Environment, Climate Change, Disaster Management and Meteorology	SIG authorising agency	Responsible for environmental permitting and impact management	High for 'prescribed activities'	High for 'prescribed activities'	Provides environmental approvals/permits
Affected People and Communities	Affected People	Beneficiaries	High	Medium	Meet their needs and safeguard their interests Keep informed of anything that impacts them
NGOs, civil society organisations, Representatives of Affected Peoples	NGOs	Representation of interests of disadvantaged and vulnerable groups	Medium	Medium	Meet their needs/show consideration of their interests Keep informed of anything that impacts their stakeholders
Provincial Governments	SIG delivery partner	Key Stakeholder in some Activities	High for projects in Province	High for projects in province	

5.3 Privacy and confidentiality

Any communications and consultations records containing personal information will be kept in line with the DFAT Privacy Policy, and the [Australian Privacy Principles](#) (APP) contained in the Privacy Act 1988 (Cth) (Privacy Act). The most relevant item for this program from an operational perspective is APP 11, which concerns the security of personal information: “taking reasonable steps to protect personal information held from issue, interference and loss, and from unauthorised access, modification or disclosure.” However, all APPs, and the Privacy Act, must be followed in the carrying out of activities under SIIP.

For example, socio-economic surveys, consultation/engagement or training attendance sheets, or land records, all of which may be required on larger infrastructure delivery activities, need to be managed in line with these.

5.4 Grievance redress mechanism (GRM)

Principle 3 of the DFAT safeguards policy requires a GRM to receive affected parties’ concerns on environmental and social performance and facilitate resolution. There is a commitment for the GRM to be **accessible** and **culturally appropriate**, and ensures that grievances are handled **promptly, transparently**, and **without retribution or cost** to the party that raised the concern.

The GRM for the SIIP program is outlined below, ensuring that personnel, communities, and affected people have a clear and accountable process through which to direct complaints relating to the Program.

In the case of infrastructure development, if a construction contractor has evidenced a functioning GRM system, their GRM can be the primary GRM for the specific activity in a given community. In this case, the Contractor will be obliged to:

- promote the SIIP GRM details, alongside the contractor’s GRM, for the duration of the activity/ies; and
- Provide regular intermittent reporting to the managing contractor (SIIP/Cardno), and allow for regular inspection and produce evidence of the functioning process whenever requested.

These requirements will be detailed in the Technical Specification for construction activities.

The Safeguards Lead will be responsible for delegating action on the grievances, their resolution, and overseeing the records system, and preparing reporting to the Team Leader and DFAT as required.

5.4.1 Procedure

This procedure has been developed for SIIP, and its effectiveness will be reviewed after the first year of operation to assess any challenges, weaknesses, or gaps.

Table 3. Grievance redress mechanism procedure

GRM Step	Step Description	Responsible	Timeframe
1	<p>Lodge Complaint</p> <p>The contact options will vary by activity, and will be dependent on location, context, size/expected length of project, and presence on site. will be promoted wherever activities occur.</p> <p>By email: grm@siip.com.sb</p> <p>By phone: 677 42970 (SIIP Program Office)</p> <p>If you would like to lodge a complaint and remain entirely anonymous, but have the complaint registered and investigated, please contact Cardno’s whistleblower hotline:</p> <p>email cardnowhistleblowerhotline@deloitte.com.au</p> <p>web http://www.cardnowhistleblowerhotline.deloitte.com.au/.</p>	Affected Party (AP)	Any time

GRM Step	Step Description	Responsible	Timeframe
	<i>For infrastructure development activities, a range of options may be appropriate, depending on the situation and location, such as the development of a paper-based form available at a community hub (noticeboard, church, etc.) and a trusted person in affected community/ies (after first engagement session) to carry out this role to support people with literacy limitations.</i>		
1A	<p>SIIP registers Complaint Enter complaint into SIIP GRM Register and refer to appropriate person within Project team. The complainant is contacted, the complaint acknowledged, the complainant is advised of the next steps and anticipated timeframes.</p> <p>Important: Any complaints that relate to Cardno’s CPP, PSEAH Policy, or Safeguarding Policy will be immediately referred to the appropriate contact within Cardno. The Safeguards Lead is the Safeguards Focal Point, and as such will follow the appropriate corporate procedures. These matters will be dealt with at a corporate level, as per our obligation, and will NOT be dealt with further in the GRM Register. The status will be listed as “referred”, with the details of the referral to Cardno (including date and person/email).</p>	Safeguards Coordinator	Within 1 working day
2	<p>Complaint Review and Investigation Safeguards Lead reviews the issue and in consultation with the AP (if additional information is required), the Climate and Community Manager, Team Leader, and Performance and Project Management Lead, and/or other appropriate parties, investigates the matter to clarify details. SIIP Safeguards Lead (or delegate) identifies a solution to the issue.</p> <p>Important: If, as a result of preliminary investigation, SIIP identifies new information that requires escalation via corporate process for DFAT Safeguard compliance matters, the complaint must be referred to Cardno (as per relevant policies), and the AP is to be advised of next steps. The Register is updated but will be listed as referred, with details of the referral to Cardno (including date and person/email).</p>	SIIP Safeguards Lead (with other inputs as required)	<p>For urgent matters, within 48 hours. For standard matters 5 working days.</p> <p><i>Some timeframes may vary depending on remoteness of complaint and contact limitations.</i></p>
3	<p>Proposed Resolution SIIP Safeguards Lead (or delegated person) contacts the AP and describes the proposed solution.</p>	SIIP Safeguards Lead	Within 3 working days of investigation completion. (8 working days total since complaint receipt)
3A	<p>If solution is accepted by the AP, the responsible person:</p> <ul style="list-style-type: none"> ▪ Updates the form and/or register ▪ Implements the solution (or refers to appropriate person to implement) ▪ Ensures a task or mechanism is in place to check if the solution has been sufficiently implemented after a reasonable period. 	SIIP Safeguards Lead	
3B	<p>If proposed solution not accepted by the AP, and no alternative is identified and accepted by AP, the complaint is considered unresolved and is escalated to step 4A. In this step, the AP is advised of the next steps and given a reasonable timeframe (no more than an additional 5 working days)</p>	SIIP Safeguards Lead	
4	<p>Escalation Safeguards Lead refers matter to Steering Committee. The Relevant Agency contact point investigates, discusses with people involved (including Team Leader and affected person/people). Proposes solution.</p>	Steering Committee contact point	Within 5 working days
4A	<p>Steering Committee contact point contacts the Team Leader and Climate and Community Manager with described solution to then contact the AP. If solution is accepted by the AP, the contact point:</p> <ul style="list-style-type: none"> ▪ Updates the form and/or register ▪ Implements the solution (or refers to appropriate person to implement) ▪ Ensures a task or mechanism is in place to check if the solution has been sufficiently implemented. 	Steering Committee contact point	
4B	<p>If solution not accepted by the AP, and no alternative is identified and accepted, the complaint is considered unresolved. The AP is advised of their option to take their complaint to either: the Office of the Ombudsman, either by phone to 21855</p>	Safeguards Lead or Team Leader	As per legal processes or other agency GRM

GRM Step	Step Description	Responsible	Timeframe
	/ 21856, or by email to oosi@ombudsman.gov.sb or to DFAT through aidsafeguards@dfat.gov.au		

5.4.2 GRM register

A complaint register, a sample of which is shown in Annex 3, will be kept in Microsoft Excel on Sharepoint, will be password protected for limited access, and will be regularly updated and reviewed by the Team Leader and Climate and Community Manager, and reported in summary form to the Steering Committee at agreed intervals.

5.4.3 Disclosure

The GRM must be disclosed to all persons affected by the Program, including:

- Staff and Program team members
- Technical Advisors (TAs)
- Affected communities (or those where activities are proposed)
- Key stakeholders, including all Government agencies represented in the Steering Committee.

A flyer outlining the above procedure, with clear contact details and a set of paper forms, should be readily available in affected communities and agencies.

6 Institutional Accountability

The SIIP team is committed to safeguarding the communities and environment in its work to deliver infrastructure to the people of Solomon Islands.

6.1 Roles and responsibilities

Safeguards are the responsibility of all team members in SIIP. All team members will be familiar with the principles and requirements in order to ensure the Program operates in a way that ensures compliance with DFAT and Cardno safeguard policies, and national legislation.

Some team members have specific roles in relation to the processes outlined in this ESMF. These are outlined below in **Table 4**.

Table 4. SIIP safeguard-specific roles and responsibilities

SIIP Position	Currently occupied by	Responsibilities
Safeguards Coordinator	tbc	Management of SIIP Risk & Safeguard Screening
Safeguards Lead (Climate and Community Manager)	Hudson Kauhiona	<ul style="list-style-type: none"> - Full time contact point for all Safeguards matters - Provide advice and guidance and delegate to Safeguards STA as required
Safeguards STA	Jo Buldeski	<ul style="list-style-type: none"> - Development of ESMF and related processes and procedures - Monitoring successful implementation across SIIP activities - Safeguards advice and support - Oversight of Safeguards obligations
Activity Lead/s	As per each Activity	<ul style="list-style-type: none"> - Ensure process is followed and input is received - Ultimate responsibility for keeping team aware of activity and the need and timing for inputs
Team Leader	Eleanor Fenton	General oversight
GEDSI STA	Imrana Jalal	<ul style="list-style-type: none"> - Review and provide input on all Risk and Safeguard Screening, ACNs/SAs - Monitoring & Guidance
Climate Change and Disaster Resilience STA	Tanja Mackenzie	<ul style="list-style-type: none"> - Review and provide input on all Risk and Safeguard Screening, ACNs/SAs - Monitoring and Guidance
All team members	-	<ul style="list-style-type: none"> - Awareness of Safeguards Process, ESMF, and location of key guidance and principles. - Participation in all relevant training - Ensuring compliance with all operational policies and procedures, including maintaining awareness of child protection, PSEAH, and other reporting frameworks as well as GRM.

6.2 Resourcing

6.2.1 Budgets

The **Operational** responsibilities outlined in this document are included within existing SIIP budgets.

Activities will be resourced based on appropriate levels of input from the safeguards and cross-cutting (GEDSI, CCDR, capacity building) teams. Any activities that result in a greater scope than budgeted, or that fall outside of the scope of SIIP or this ESMF, will be discussed in detail with the Steering Committee and DFAT to confirm approach and/or further resources required.

6.2.2 Staff resources

This process outlined in the ESMF will largely be implemented, monitored, and reported on by the existing Safeguards Lead and STA resources, commensurate with size and scope of activities (decided on the basis of risk).

For larger infrastructure delivery activities or activities with higher risks, additional resources and Terms of Reference for additional STA resources will be considered and prepared based on risk, project and contracting approach, and capacity and capability of stakeholders.

6.3 Process and oversight

This Framework provides significant risk-based initial guidance at Program commencement for all activities proposed and/or funded by SIIP. The Program has built in mechanisms to ensure ongoing compliance and continual improvement, including:

- Internal Review processes (outlined in section 6.3.1 below)
- Contractual requirements and technical specifications
- Monitoring, Evaluation, and Learning Framework and Plan (refer to MELF/MELP).

6.3.1 Safeguards review

All activities, and the GRM, will be reviewed on the basis of safeguards implementation and compliance with this ESMF on a regular basis (at least weekly) by the Safeguards Coordinator, supported by the Safeguards STA. Any findings, issues, or potential improvements to process will be either immediately actioned, or included for discussion at the Internal Safeguards Review Workshop.

The broader team will be involved in oversight activities as and where required, but as a minimum, compliance with this ESMF will be reviewed:

- by the Safeguards Coordinator, Climate and Community Manager, CCDR STA, Safeguards STA, GEDSI STA, Capacity Development STA, Infrastructure Lead, and Team Leader via quarterly **Internal Safeguards Review Workshops**.
- by whole of team, including DFAT representatives and any Steering Committee members who wish to participate (preferably the SC Contact Point for the GRM), via twice-yearly **Safeguards Lessons Learned Workshops**.

Each of these workshops will produce a briefing note summary that will suggest process and procedural improvements, with delegated team members who will be responsible for the improvement implementation.

6.3.2 Program reporting

Safeguards activities relating to the ESMF, and the progress of safeguards for each of the activities, will be reported regularly as part of broader program reporting (e.g. Annual Report, Six Month Reports etc.).

6.4 Review of this document

The ESMF, while expected to remain in place for the life of the Program, is a preliminary version, developed in the first six months of SIIP's operation. The ESMF is expected to reflect the priorities and meet the needs of the Program, and will be:

- Reviewed formally each year on or around the anniversary of the Program's commencement (May 2021) and reissued if material changes are identified as necessary and made, with approval of the Steering Committee and DFAT.
- Reviewed and updated on the basis of any material changes to the DFAT safeguard policies or the SIIP scope, management arrangements, or risk profile, or on identification of any major oversight or issue relating to the functionality or correctness and wholeness of the information contained herein.

Annex A SIIP Investment Design Risk and Safeguard Tool (DFAT) 2019

Safeguards Screening Checklist				
Environmental and Social Safeguards	No Yes Unsure	If 'Yes' or 'Unsure'		Inherent risk rating (before controls)
		Likelihood	Consequence	
Environmental protection				
<p>Could the investment have an adverse impact on the environment? For example, by supporting or providing advice on any of the following:</p> <ul style="list-style-type: none"> • infrastructure development, such as roads, bridges, airports, railways, ports, dams, water, sanitation and hygiene (WASH), waste management, telecommunications, energy production and distribution facilities, urban development. • construction/renovation/refurbishment/demolition of buildings such as schools, hospitals, health facilities or any of the infrastructure above • diversion of water, including for water supply, irrigation, flood-mitigation, or aquaculture • rural development, agriculture, food production, or forestry activities • activities in the extractives (oil, gas, mining), manufacturing, transportation and tourism sectors. 	Yes	Likely	Major	High
<p>Could the investment increase environmental, climatic and/or social vulnerability, including by (but not limited to):</p> <ul style="list-style-type: none"> • increasing emissions of greenhouse gases (e.g. energy intensive process will lead to an increase in Green House Gas production) • reducing incentives to adapt (e.g. change in social norm away from responsible water conservation to increased consumption) • increasing the vulnerability of people (particularly the most vulnerable) or the environment to climate change (e.g. pesticides, used to eradicate mosquitoes that carry dengue fever, damage native insect populations which reduces agricultural productivity, leading to food insecurity) • increasing the impact of disasters, e.g. will infrastructure building codes and specifications be adequate for the intensity of disasters/hazards experienced in the investment area (e.g. floods, earthquakes, cyclones), will the investment impact the food security of a vulnerable population • setting paths that limit future choices (e.g. large capital and institutional commitment reduces portfolio of future adaptation options). 	Yes	Likely	Major	High
Sexual exploitation, abuse and harassment				
Is there a risk of sexual exploitation abuse or harassment occurring in any aspect of the delivery of this DFAT activity (including DFAT activities implemented by downstream partners)?	Yes	Possible	Moderate	Medium
Does this activity include risk factors that exacerbate the SEAH risks	Yes	Possible	Moderate	Medium
Children, vulnerable and disadvantaged groups				
Could the investment have an adverse impact on vulnerable and/or disadvantaged groups including children, women, people with disabilities, minority groups, or the elderly?	Yes	Possible	Moderate	Medium
Could the investment involve contact with children or working with children?	Yes	N/A	N/A	Medium
Displacement and resettlement				
<p>Could the investment involve activities or provide advice about an activity that will:</p> <ul style="list-style-type: none"> • displace people, either physically or economically • exclude or reduce people's access to land they live on or used to generate livelihoods 	Yes	Possible	Major	High

Safeguards Screening Checklist				
Environmental and Social Safeguards	No Yes Unsure	If 'Yes' or 'Unsure'		Inherent risk rating (before controls)
		Likelihood	Consequence	
<ul style="list-style-type: none"> exclude or reduce people's access to land that is of cultural or traditional importance to them? 				
Indigenous peoples				
Could the investment involve activities that adversely impact the: <ul style="list-style-type: none"> dignity, human rights, livelihood systems or culture of indigenous peoples land or natural and cultural resources that indigenous peoples own, use, occupy or claim? 	No			-
Health and safety				
Could the investment involve activities that adversely impact the health and safety of workers and/or others?	Yes	Likely	Major	High
Could the investment involve DFAT workers?	No	If yes, follow relevant departmental WHS policies and contact whs@dfat.gov.au for advice.		
Could the investment involve risk of exposing workers and/or communities to asbestos?	Yes	If yes, ensure that this investment complies with the Department's policy on managing asbestos risk in the aid program.		
Overall Safeguard Risk Rating	High			