

Fiji Social Protection COVID-19 Response and System Development Project

Additional Financing

Environmental and Social Management Framework (ESMF)

April 2022

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AF	Additional Financing
DOE	Department of Environment
E&S	Environmental and Social
ES COP	Environmental and Social Code of Practice
EHS G	World Bank's Environment, Health and Safety Guidelines
EIA	Environmental Impact Assessment
ES CP	Environmental and Social Commitment Plan
ES F	Environmental and Social Framework
ES MF	Environmental and Social Management Framework
GI IP	Good International Industrial Practice
Go F	Government of Fiji
GR M	Grievance Redress Mechanism
JFN 2	Jobs for Nature 2.0
LMP	Labor Management Procedure
M&E	Monitoring and Evaluation
MO E	Ministry of Economy
MO WE	Ministry of Environment
OHS	Occupational Health and Safety
PDO	Project Development Objective
PMU	Project Management Unit
SEP	Stakeholder Engagement Plan
TA	Technical Assistance
ToRs	Terms of References

1. PROJECT DESCRIPTION

1.1 Background

The global pandemic of COVID-19 has significantly affected the economy and levels of employment in Fiji. The Government of Fiji (GoF) has implemented border closure and international travel restrictions, as well as a set of stringent measures to restrict the movement of Fijians – in order to contain the geographical spread of the virus – and to ensure that businesses in some sectors (e.g. trade, transportation) are able to continue operating safely. As a result, unemployment and underemployment has increased significantly, affecting over 100,000 jobs both in the formal and informal sectors. Following its largest ever contraction registered at 15.7 percent in 2020, the Fijian economy is projected to register a further 4.1 percent decline in 2021.

To mitigate the impact of the COVID-19 crisis on the income of the unemployed and underemployed, and to increase efficiency and adaptability of the social protection system, the GoF, in cooperation with the World Bank (the Bank), has implemented a Fiji Social Protection COVID-19 Response and System Development Project (the parent project), which became effective on February 19, 2021 and has a closing date of July 31, 2024. The parent project supports: (a) component 1 - cash transfers to the unemployed and underemployed affected by COVID-19; and (b) component 2 - institutional strengthening in the social protection system. Since effectiveness, the parent project's progress towards the achievement of the project development objective and the overall implementation progress has been Satisfactory.

In August 2021, GoF has requested the Bank to provide additional financing (AF) to the parent project in the amount of US\$50 million to continue supporting the unemployed and vulnerable affected by the COVID-19 crisis. The AF will support: (a) cash transfers to individuals who have lost their livelihoods as affected by the COVID-19 pandemic; (b) temporary employment programs building on the government's Jobs for Nature initiative that has been introduced as part of the emergency package and re-launched as 'Jobs for Nature 2.0 (JFN2)'; and (c) technical assistance and capacity building activities to enable the government to effectively deliver these programs.

This Environmental and Social Management Framework (ESMF) is an environmental and social (E&S) instrument prepared for the AF according to the Bank's Environmental and Social Framework (ESF), which sets up a management framework for the implementation of the AF.

1.2 Project Description

The project development objective (PDO) of the AF remains unchanged as that of the parent project, i.e. to mitigate the impact of the COVID-19 crisis on the income of the unemployed and underemployed, and to increase efficiency and adaptability of the social protection system.

Given the fact that the cash transfer program financed under Component 1 of the parent project was completed, and in order to ensure a simple and transparent introduction of new activities, the proposed AF introduces new components for financing of unemployment assistance and employment support, under Components 3 and 4. In order to maintain a single component under which procurable activities are taking place, changes to technical assistance activities are accommodated within the current Component 2. The distribution of the AF activities and the associated costs are as follows:

- **Component 3: Unemployment assistance (US\$ 40million).** This component will support retroactive financing of cash payments to the unemployed who lost jobs or livelihood in formal and informal sectors because of the COVID-19 pandemic. Eligible Fijians received FJD 120 per month for a period of six months from August 2021 to January 2022. Eligible beneficiaries were those unemployed in the formal sector (across Fiji)

without sufficient FNPF General Account balances, or those affected in the informal sector in geographic locations affected by movement restrictions and business closures (mostly in Viti Levu, Fiji's largest island). Eligibility was restricted to beneficiaries that are not current recipients of other government supported transfers, including social assistance payments. The first payment of FJD 360 was made in August 2021 to cater for the three months period ending in October 2021 to eligible Fijians who have received their first dose of vaccination by August 31, and the second payment of FJD 360 was paid out in November 2021 to cater for the three months ending January 2022 to eligible Fijians who were fully vaccinated by October 31. The AF will provide retroactive financing in the amount of US\$35 million, about 37 percent of the total government budget. Funding for this component is entirely retroactive and no future payments will be made. The proposed AF sets out rapid disbursement under this component to be made against the eligible expenses in the first and second cash payment. Since the AF will be signed after the actual payments have taken place, this component will rely entirely on retroactive financing, up to a share of 80 percent of the total IDA financing.

- **Component 4: Supporting employment opportunities for green, resilient, and inclusive growth (US\$9 million):** This component will support job opportunities through public works for vulnerable Fijians residing in rural areas. Activities will be developed and implemented through interventions aimed at protection, restoration and rehabilitation of natural resources developed with community participation and building on the government's original Jobs for Nature initiative, the World bank funded scheme will be called 'Jobs for Nature 2.0 (JFN2)'.¹ To achieve this objective, the component will finance the labor costs of small grants that MOE will provide for village cooperatives and registered groups selected by PMU based on a transparent Expression of Interest process and to be paid to community members in relation to the implementation of eligible activities. A preliminary list of activities that the cooperatives and successful groups will carry out includes (a) wetlands protection: mangrove planting, seagrass planting, restoring waterways, waste and wastewater management; (b) riverbank rehabilitation and coastal bank protection: mangrove planting, vetiver grass planting; and (c) enhancing biodiversity: forest restoration, land upgrade through native tree planting, coral reef protection. Labor costs will be provided for pre-identified job profiles to be carried out under public works, including low-skilled physical labor, administrative tasks, transportation, and care provision for children of female workers.
- Additional **technical assistance and capacity building** under Component 2 of the parent project: These will be capacity building and training activities for effective communication strategy, beneficiary identification, selection, eligibility verification, management of beneficiaries, effective service provision, fiduciary oversight, grievance redress mechanism, and monitoring and evaluation etc.

1.3 Implementation Arrangement

Implementation of the AF will continue to be led by the Project Management Unit (PMU) established under the Ministry of Economy (MOE) for the parent project, working in close partnership with all implementing agencies involved and overseen by a Steering Committee (SC).

¹ The World Bank funded employment support under Component 4 is inspired by the Fijian Jobs for Nature Program however as Jobs for Nature does not meet the Environmental and Social Standards of the World Bank, the employment support will take a new name (most likely 'Jobs for Nature 2.0.0') and will be subject to the environmental and social requirements set out within this ESMF, as well as the project's Labor Management Procedure and Stakeholder Engagement Plan.

Under the **Component 3**, the PMU (MOE) is responsible for overall implementation of the COVID-19 cash assistance to the unemployed, in partnership with relevant government agencies, including Ministry of Communications (MOC), Ministry of Health and Medical Services (MOHMS), Ministry of Women Children Poverty and Alleviation (MWCPA), Fiji Revenue and Customs Service (FRCS), Tertiary Scholarship and Loans Board (TSLB), and telecommunications companies of Vodafone and Digicel.

Component 4 will support eligible activities that comprise the new 'Jobs for Nature 2.0 (JFN2)' employment support (formally 'Jobs for Nature'). JFN2 will be implemented in partnership between the MOE (including the Climate Change Division) and the Department of Environment (DOE) of the Ministry of Waterways and Environment (MOWE). MOE and DOE are jointly designing 'JFN2' and will coordinate implementation. MOE will be responsible for budgeting, fiduciary oversight, and payment while DOE is responsible for outreach campaign, proposal review for investment decision, and technical assistance provision to the beneficiaries throughout the entire cycle. The eligible activities for component 4 will be overall managed by PMU, in collaboration with DOE for implementation. The implementing arrangements; including detailed roles, responsibilities and chains of reporting will be elaborated upon in the next iteration of this draft ESMF.

Additional **TA activities under component 2** will continue to be implemented by the PMU of the parent project.

1.4 Objective and Application Scope

Given the fact that the component 4 will include multiple small subprojects at the community level which will only be identified during the implementation, the exact locations and environmental and social risks/impacts are not known yet at this stage. A framework approach is therefore adopted at the preparation stage for E&S risks management. The objective of this ESMF is to set up a framework for E&S risks and impacts management during the implementation of the AF with E&S screening, management procedures and technical guidance.

This ESMF will apply to all activities under the AF. PMU has committed in the updated ESCP that all the activities will be managed in line with this ESMF throughout the whole process of AF implementation, including E&S risk screening, impact assessment and development of mitigation measures, stakeholder engagement, and implementing monitoring and reporting. A key environmental and social management tool included within this ESMF is the Environmental and Social Code of Practices (ES COP). The ESCOP (Annex 5) stipulates mitigation measures to be employed by project groups – the village cooperatives - in the implementation of Component 4 Jobs for Nature 2.0 Activities. The village cooperatives are required to adhere to World Bank's Environment and Social Framework as well as the Fiji's domestic laws and regulations in the field of E&S risk management. The ESCOP will be tailored and incorporated into the contracts/agreements of village cooperatives prior to commencing project activities.

The ESMF is linked to other project environmental and social (E&S) instruments prepared, disclosed, and adopted to support the management of the Project's environmental and social risks. Other key instruments linked to this ESMF and prepared prior to appraisal include:

- Environmental and Social Commitment Plan (ESCP)
- Labor Management Procedure (LMP)
- Stakeholder Engagement Plan (SEP)

2. LEGAL FRAMEWORK

The implementation of the AF needs to comply with the requirements of the Bank's ESF, and also needs to comply with Fiji's domestic laws and regulations in the field of E&S risk management. This chapter summarizes the applicable requirements of the Bank ESF in the AF, and also GoF's existing E&S management laws and regulations that are most relevant to the AF. These constitute the legal basis of the E&S management framework of the AF.

2.1 Bank ESF

The Bank ESF applies to the AF. Table 2-1 summarizes the relevance and applicability of ten Environmental and Social Standards (ESSs) to the Project.

Table 2-1 Applicability of Bank ESSs

No.	ESS	Relevance	Application
1	ESS1: Assessment and Management of Environmental Risks and Impacts	Yes	<ul style="list-style-type: none"> - Component 4 will support multiple small works sub-projects conducted by local communities for the protection and restoration of the natural environment. These activities may present low to moderate environmental and social risks (with exclusion of potentially high and substantial activities) based on preliminary risk screening during preparation. The component 3 cash transfer support may also have potential social risks in terms of adequacy of social inclusiveness of eligible beneficiaries and vulnerable groups. - As the specific component 4 activities will be identified during implementation, this ESMF is developed to formulate principles, procedures and measures for the E&S management during the implementation. - Design and implementation of the program will need to ensure that disadvantaged and vulnerable amongst the targeted beneficiaries have equitable access to participate in and benefit from the program. - The SEP and ESCP of the parent project are updated as per ESF requirements. - The LMP of the parent project will be further updated during implementation when more information about the project workers is available for the JFN2 activities. - An ESCP is prepared for the project summarizing the MOE's commitments to key ESF requirements to manage and mitigate identified risks and impacts.
2	ESS2: Labor and Working Condition	Yes	<ul style="list-style-type: none"> - The AF involves direct workers and contracted workers, therefore, the working condition, worker's rights, project worker's grievance redress mechanism, occupation health and safety provisions of this ESS apply to the AF. - ESMF specified in the exclusion list to exclude possible child labor and forced labor activities. - ESMF includes a LMP to guide the preparation of future activities. - A GRM for project workers is established in the LMP.
3	ESS3: Resource Efficiency and Pollution Prevention and Management	Yes	<ul style="list-style-type: none"> - Component 4 activities will involve small works which would have potential impacts in terms of dust, noise, wastewater, solid waste, energy/resources use, etc., therefore, this ESS applies. - This ESMF sets out requirements on pollution management and resources saving for the specific activities in accordance with the Bank ESF. Relevant measures and management approaches are reflected in the generic Environmental and Social Code of Practices (ESCOP) in this ESMF and will be included in relevant E&S management documents of the future subprojects.

No.	ESS	Relevance	Application
4	ESS4: Community Health and Safety	Yes	<ul style="list-style-type: none"> - Component 4 will have health and safety impacts on the communities near the subproject sites, including community health and safety risks from construction safety, traffic safety, public health risks of COVID-19 and other commutable diseases, etc. - This ESMF include common mitigation measures in the ESCOP.
5	ESS5: Land acquisition, Restriction on Land Use and Involuntary Resettlement	No	<ul style="list-style-type: none"> - E&S screening criteria has been established in the ESMF to exclude activities under component 4 that would have potential to involve involuntary land acquisition, land use restriction or resettlement or involuntary physical or economic displacement.
6	ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Yes	<ul style="list-style-type: none"> - Component 4 will primarily contribute to the biodiversity conservation and protection of natural resources. While, minor temporary adverse impacts may be envisaged during construction of the small works, e.g. temporary disturbance of water quality and habitats, short-term damage of surface vegetation etc. - Through exclusion criteria, the AF will not support activities that may cause significant adverse impacts on natural habitats and biodiversity. - Common measures are developed in the ESCOP of the ESMF.
7	ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	No	<ul style="list-style-type: none"> - ESS7 is not relevant to the Project. The Indigenous Peoples of Fiji, the iTaukei, are the mainstream society in Fiji. The iTaukei represent the majority, or 57 percent of the population according to the 2007 census. The Indigenous Peoples of Fiji, the iTaukei, are the mainstream society in Fiji. The iTaukei represent the majority, or 57 percent of the population according to the 2007 census. As iTaukei customary cultural, economic, social and political institutions are the mainstream culture of Fijian society, ESS7 in not considered relevant. The iTaukei do not meet all the four identifying characteristics of ESS7, including separate language and institutions from dominant society. - The remaining population in Fiji are comprised of Indo-Fijians (38 percent), whose ancestors migrated to the Fijian Islands in the late 19th and early 20th centuries. The remaining 5 percent consist of other minority communities, including people from various Pacific Island countries, Australia, New Zealand, the People's Republic of China, and Europe. The Indo-Fijians and other minority communities do not meet the identifying characteristics of ESS7. The project design and implementation arrangements mainstream non-discrimination and social inclusion of all Fijian irrespective of indigenous status. - The Project's ESCP and SEP commit the project to raising awareness and conducting stakeholder engagement with disadvantaged or vulnerable individuals and groups across the Fijian population, including across diverse ethnic groups. Awareness raising and stakeholder engagement will be adapted to account for such groups or individuals' particular sensitivities, concerns and cultural sensitivities.
8	ESS8: Cultural Heritage	Yes	<ul style="list-style-type: none"> - The AF will involve small works which may have the potential impacts on movable and immovable cultural heritages. There is also the possibility of chance find during the plantation and rehabilitation activities. - The ESMF includes exclusion provisions to exclude any subproject that has significant impacts on existing cultural heritage, and

No.	ESS	Relevance	Application
			relevant measures (including chance-find procedures) are included in ESCOP.
9	ESS9: Financial Intermediary (FI)	No	- AF does not involve FI, therefore, this ESS does not apply to the AF.
10	ESS10: Stakeholder Engagement and Information Disclosure	Yes	- Information dissemination, consultation, and disclosure needs to ensure that information about accessing the program benefits reaches targeted beneficiaries and that it ensures equitable access to project benefits by disadvantaged and vulnerable stakeholders. An effective and accessible grievance mechanism is required. Language requirements of the public and targeted beneficiary stakeholders need to be taken into consideration, such as using English, Itaukei and Hindi to ensure the information is accessible to all. - SEP is updated to incorporate the additional activities under the AF.

In addition to the ten ESS, the Bank ESF also requires the application of relevant requirements of the Bank Group Environment, Health and Safety Guidelines (EHSGs). The EHSGs includes normally acceptable and achievable performance levels and measures. The Bank Group EHSGs include one General Guidelines and a series of 62 sector-specific guidelines.

As the AF component 4 will only support small scale environmental protection works at community level and does not include any industrial sectorial activities, only the General Guidelines of EHSGs is relevant to the AF. The general measures of this Guidelines for construction related impacts (such as noise, dust, soil erosion, waste management, worker's health and safety, community health and safety etc.) are incorporated into the ESCOP of the ESMF.

2.2 Legal Framework for E&S Management of GoF

The GoF's existing E&S management laws and regulations that are most relevant to the AF include:

Table 2-2 Gaps between WB ESF and Fiji legislative requirements, and gap filling measures

WB Environmental and Social Standards	Fiji Legislative Requirements	Equivalence and Gap Filling
ESS1 – Assessment and Management of Environmental and Social Risks and Impacts		
To identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the ESSs.	Environment Management Act 2005 (EMA) and Environment Management Regulations 2007 require screening of development proposal. Those with significant impact require the preparation of an Environment Impact Assessment. Significant impacts are to be managed and mitigated through an Environmental Management Plan.	Partial equivalence.
To adopt a mitigation hierarchy approach to: (a) Anticipate and avoid risks and impacts; (b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; (c) Once risks and impacts have been minimized or reduced, mitigate; and (d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.	This act governs the management of Fiji's natural environment and looks to protect it through Part 4 and Part 5 of the EMA which is the Environment Impact Assessment and Waste Management and Pollution Control. Regulations that support the Environment Management Act are the Environment Management (EIA Process) Regulations 2007 and the Environment Management (Waste	ESS1 and EMA requirements would need to be followed with respect to management of environmental risks.
To adopt differentiated measures so that adverse impacts do not fall disproportionately		Due to the Nature and the Scope of the JFN2 activity, i.e. all subproject will be small scale environmental

WB Environmental and Social Standards	Fiji Legislative Requirements	Equivalence and Gap Filling
<p>on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities resulting from the project.</p>	<p>Disposal and Recycling) Regulations 2007.Environment Management (EIA Process) Regulations 2007 outlines procedures developers are to adhere to in carrying out any development activity. Approving authorities are to examine all proposed developments and determine whether the proposed activity is likely to pose an environmental or resource management impact.</p>	<p>protection and ecological system rehabilitation and enhancement activities driven by and implemented at community level, it is unlikely that such activities would have high or substantial</p>
<p>To utilize national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate.</p>	<p>Environment Management (Waste Disposal and Recycling) Regulations 2007 is addressing commercial and industrial facilities in the management of their waste. Regulated activities under the regulations include the following:</p>	<p>environmental and social risks and impacts. It is unlikely that full EIA process is triggered in accordance with Fiji's environmental laws and regulations.</p>
<p>To promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.</p>	<p>a) Discharge any waste or pollutant into the environment; b) handle, store, process, or control any hazardous substance; c) produce or generate any waste, pollutant or hazardous substance; or d) engage in any activity that may have an adverse impact on human health or the environment,</p> <p>Schedule 1 of the Environment Management Act 2005 further stipulates other environment and resource management laws also available in Fiji.</p> <ol style="list-style-type: none"> 1. Factories Act (Cap 99) 2. Fisheries Act (Cap 158) 3. Forest Decree 1992 4. Ionizing Radiations Act 5. Litter Decree 6. Marine Spaces Act 7. Mining Act 8. Ozone Depleting Substances Act 1998 9. Petroleum Act (Cap 190) 10. Public Health Act (Cap 111) 11. Rivers and Streams Act (Cap 136) 12. Quarries Act (Cap 147) 13. Sewage Act (Cap 128) 14. Town Planning Act (Cap 139) 15. Water Supply Act (Cap 144) 	<p>The PMU as part of the verification process will screen applicants for Component 4 to ensure all activities do not cause high or substantial environmental and social risks, and do not trigger EIA process.</p> <p>Social risks management are not covered in the Fiji legislation and so the project will follow WB ESF requirements as set out in the respective project instruments (ESCP, ESMF, SEP, and LMP).</p>
<p>ESS2 – Labor and Working Conditions</p>		

WB Environmental and Social Standards	Fiji Legislative Requirements	Equivalence and Gap Filling
To promote safety and health at work.	Employment Relations Act 2007 (ERA)	Partial equivalence.
To promote the fair treatment, non-discrimination and equal opportunity of project workers.	Fiji's main legislation covering labor and working conditions. It sets out fundamental principles and rights at work including: the prohibition on forced labor and on the worst forms of child labor; the right to non-discrimination, freedom from harassment and equal opportunity in employment, equal pay for equal work, and freedom of association. The ERA regulates terms and conditions of employment including:	Workers from communities employed by village cooperatives under the JFN2 Program will be contracted workers and covered under the ERA. Accordingly, they have rights under the law to minimum wages, minimum standards with respect to working hours and condition. As stipulated under the Act, the employment contracts are to specify to dispute resolution procedures.
To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.	<ul style="list-style-type: none"> • The establishment and termination of employment. • The payment of wages. • Hours of work. • Leave. • Minimum age for employment and restrictions on the employment of children. • Grievance procedures and dispute resolution mechanisms. • Procedures governing industrial action. 	The project will apply the WB ESF requirements set out in the project's LMP.
To prevent the use of all forms of forced labor and child labor.	In addition to the ERA, subsidiary legislation - including the Employment Relations (Administration) Regulations 2008, Hazardous Occupations Prohibited to Children under 18 Years of Age Order 2013, and Employment Relations (National Minimum Wage) Regulations 2015 - set out further details on these provisions.	
To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.	The Human Rights Commission Act 1999 (HRCA)	
To provide project workers with accessible means to raise workplace concerns.	The Act prohibits unfair discrimination and harassment in employment, including in recruitment and training. The HRCA provides that any person may make a complaint to the Human Rights Commission about unfair discrimination, harassment or another contravention of their human rights under the Act. The HRCA outlines the Commission's powers to investigate and conciliate a complaint. It also sets out judicial remedies for unfair discrimination or a	

WB Environmental and Social Standards	Fiji Legislative Requirements	Equivalence and Gap Filling
	<p>contravention of Fiji’s Bill of Rights. In addition to the HRCA, the <i>Rights of Persons with Disabilities Act 2018</i> sets out the rights to equal opportunity and non-discrimination in work and employment for people with a disability and includes provisions for ensuring safe work access for workers with disabilities among other rights.</p> <p>Health and Safety at Work Act 1996 provides for:</p> <p>a)Reform the law relating to the health and safety of workers, and other people at work or affected by the work of other people.</p> <p>b)Provide Clear Objectives, obligations and functions which cover every workplace.</p> <p>c)Set out the roles of employers, including workers, self-employed persons, manufacturers, designers, suppliers, installers, inspectors and provides methods for the development of detailed standards and codes of practice; and</p> <p>d)Provide for the consolidation and progressive replacement of the associated Health and Safety Legislations as defined and related matters.</p>	<p>The works carried out on site would have low health and safety risks due to the nature of the activity involved. Health and safety requirements are incorporated into the ESCOP.</p>
ESS3 – Resource Efficiency and Pollution Prevention and Management		
To promote the sustainable use of resources, including energy, water and raw materials.	<p>The EMA and supporting Regulations require screening and management of risks of pollution as well as a permitting process to assist with understanding of environmental consequences and actions required to protect, restore, and enhance the environment, as well as sourcing raw aggregate material required, and disposal of waste.</p>	<p>Partial equivalence. ESS3 requirements will be followed where there are gaps in local legislation.</p>
To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities.		
To avoid or minimize project-related emissions of short and long-lived climate pollutants.		
To avoid or minimize generation of hazardous and non-hazardous waste.		
To minimize and manage the risks and impacts associated with pesticide use.		

WB Environmental and Social Standards	Fiji Legislative Requirements	Equivalence and Gap Filling
ESS4 – Community Health and Safety		
To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and nonroutine circumstances.	No specific health and safety regulations or policies relating to community well-being.	ESS4 requirements will be followed where there are gaps in local legislation.
To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams.		
To avoid or minimize community exposure to project related traffic and road safety risks, diseases and hazardous materials.		
To have in place effective measures to address emergency events.		
To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project affected communities.		
ESS5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement – not relevant to the project		
ESS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources		
To protect and conserve biodiversity and habitats.	The EMA provides for controls on activities posing potential threats to endangered and threatened species and to critical habitats. Endangered and Protected Species Acts 2002 and Endangered and Protected Species Regulations 2003 controls the trade, possession, and transportation of species protected under the convention on international trade in endangered species of wild fauna and flora and for related matters.	Partial equivalence. ESS6 requirements will be followed where there are gaps in local legislation.
To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity.		
To promote the sustainable management of living natural resources.		
To support livelihoods of local communities including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.		
ESS7 – Indigenous Peoples – not relevant to the project		
ESS8 – Cultural Heritage		
To protect cultural heritage from the adverse impacts of project activities and support its	The National Trust of Fiji Act 1970 provides for identification,	Partial equivalence.

WB Environmental and Social Standards	Fiji Legislative Requirements	Equivalence and Gap Filling
<p>preservation.</p> <p>To address cultural heritage as an integral aspect of sustainable development.</p> <p>To promote meaningful consultation with stakeholders regarding cultural heritage.</p> <p>To promote the equitable sharing of benefits from the use of cultural heritage.</p>	<p>registration and protection of items considered as national heritage.</p>	<p>ESS8 requirements will be followed where there are gaps in local legislation.</p> <p>Provisions have been included in this ESMF to address potential risks and impacts and comply with ESS8.</p>
ESS9- Financial Intermediary (FI)-not relevant to the project		
ESS10 – Stakeholder Engagement and Information Disclosure.		
<p>To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.</p> <p>To assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance.</p> <p>To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.</p> <p>To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.</p> <p>To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.</p>	<p>There is no consolidated legislation requiring identification of stakeholders, consultation with interested persons and public disclosure of project information though several Acts make references to consultation in specific areas (e.g. consultation requirements with interested parties for EIAs).</p>	<p>ESS10 requirements will be followed.</p> <p>Provisions have been included in the Projects SEP to comply with ESS10 on public consultation, project information disclosure and grievance mechanisms.</p>

3. E&S RISKS SCREENING AND MANAGEMENT APPROACH

3.1 E&S Risks / Impacts Screening

The proposed AF project focuses on supporting unemployed and vulnerable groups affected by the COVID-19 crisis through cash assistance and jobs support via community-driven small works for environmental protection. Significant positive environmental and social benefits are inherently designed as outputs and outcome of the AF activities. The project implementation will provide timely emergency response assistance to the Fijians whose income have been negatively affected by the COVID-19 pandemic, thus building stronger social resilience and foundation for recovery of the country. Meanwhile, the JFN2 activities will also support green and climate resilient initiatives in rural communities, which will generate significant co-benefits for environmental enhancement along the emergency response actions.

In recognition of the AF benefits; project activities will also have potential to cause E&S risks/impacts. Based on AF project design and currently available information, a general qualitative analysis of potential E&S risks and impacts is provided in this chapter (see Table 3-1). The preliminary E&S risk screening, the overall residual E&S risks of the AF is considered as Moderate.

Detailed E&S risk/impact for each specific subproject under component 4 will be screened following the procedures and requirements set out in this ESMF during the review of each subproject application. A screening checklist is available in Annex 2 of this ESMF.

Environmental risks and impacts:

The **Component 3: Unemployment Assistance** will provide cash payment to those unemployed due to the COVID-19 pandemic. No physical/civil works are involved; the unemployment assistance disperses funds to eligible beneficiaries. A social audit was conducted and included in this ESMF in appendix 1.

The **Component 4: Employment Support** will support small works sub-projects conducted by local communities for the protection and restoration of natural environment. A preliminary list of activities includes: (i) wetlands protection: mangrove planting, seagrass planting, restoring waterways, waste and waste water management; (ii) riverbank rehabilitation and coastal bank protection: mangrove planting, vetiver grass planting; (iii) biodiversity enhancement: forest restoration, land upgrade through native tree planting, coral reef protection. The potential environmental risks of this component would mainly include environmental sensitivities of sub-projects sites, plantation and rehabilitation activity related impacts such as dust, noise, waste management, soil erosion, surface vegetation damage, habitats disturbance, worker's safety and health, traffic disturbance and community safety, cultural heritage protection and chance-find procedures etc. It is envisaged that these community-driven subprojects will be all small works with the objective of environment protection and restoration. Through proper criteria to exclude high or substantial risks (e.g. due to sensitive locations), the potential environmental risks and impacts of such activities would be low to moderate. The temporary plantation and rehabilitation related environmental impacts are short-term, site specific and in minor scale, which could be avoided, minimized or mitigated through good management practice and well-known mitigation measures (e.g. a set of generic measures as ESCOP).

Additional **technical assistance and capacity building under Component 2** of the parent project will be capacity building and training activities for beneficiary identification, selection, eligibility verification, management of beneficiaries, effective service provision, fiduciary oversight, grievance redress mechanism, and monitoring and evaluation etc. These TA activities do not include activities that support the preparation of future investment projects (Type 1 TA as per Bank's guidance), or support the formulation of policies, programs, plans, strategies or legal frameworks (Type 2). They are all Type 3 capacity strengthening activities. There is no

civil works/construction involved in these TA. There are no direct or downstream indirect environmental risks/impacts envisaged for these TA activities.

With exclusion criteria established in this ESMF (see chapter 4), the overall environmental risks of the proposed AF will be considered as Moderate.

Social risks and impacts:

The **Component 3: Unemployment Assistance** provided cash payment to those unemployed due to the COVID-19 pandemic. A social audit was conducted and included in this ESMF in appendix 1 as the component is entirely retroactively financed and no future payments will be made under the component. The social audit investigated social risks relating to; (i) exclusion of targeted beneficiaries from accessing the program due to vaccine status or socio-economic situation as an individual who is poor, elderly, young, on the basis of gender, disability or any other form of vulnerability or marginalization that could create a barrier to participation; (ii) lack of information, consultation and grievance redress for stakeholders and targeted beneficiaries, (iii) labor and working conditions and (iv) protection of personal data. The Social Audit found that significant benefits were provided to the vulnerable and unemployed through the program. However, there are aspects that require further assessment as well as systems improvements that will be supported through the project's technical assistance, especially with respect to monitoring and evaluation, ensuring equitable participation and information communication for disadvantaged and vulnerable.

The **Component 4: Employment Support** will support small works sub-projects conducted by 'Village Cooperatives' aimed at the protection and restoration of the natural environment. Social risks and impacts identified as part of this component include: (i) capacity and reputational risks associated with the village cooperative: the extent to which village cooperatives are representative and accountable to a given 'community' is unknown and will vary from location to location; (ii) information and consultation; the risk that JFN2 is not widely advertised and therefore village cooperatives do not hear about the program, and or do not understand the application process and are unable to apply, (iii) access to benefits and elite capture: the risk that village cooperative are not inclusive of all 'community' members, that discrimination occurs for individuals along the lines of age, gender and other criteria or benefits are captured by elite through provisions of jobs only to family member or through soliciting funds or bribes from participating community members as an informal condition for participation in the employment support, (iv) inappropriate land use; the risk that sub-project activities are not adequately screened and occur on disputed land and/or on an involuntary basis and/or cause involuntary physical and economic displacement or land restrictions on a temporary or permanent basis, (v) lack of protections for workers; poor occupational health and safety and incidents of sexual exploitation, abuse or sexual harassment (SEA-SH) perpetrated by workers against each other or towards members of the community, (vi) the risk that child workers participate in activities.

Additional **technical assistance and capacity building under Component 2** of the parent project will be capacity building and training activities for beneficiary identification, selection, eligibility verification, management of beneficiaries, effective service provision, fiduciary oversight, grievance redress mechanism, and monitoring and evaluation etc. These TA activities do not include activities that support the preparation of future investment projects (Type 1 TA as per Bank's guidance), or support the formulation of policies, programs, plans, strategies or legal frameworks (Type 2). They are all Type 3 capacity strengthening activities. There is no civil works/construction involved in these TA. All TA activities will be screened for social risks and impacts as per the parent project ESCP; the same commitment has been reflected in the AF ESCP. The TA activities may include procurement of office equipment (computers, printers, routers etc.) which may have the implication of e-waste generation after the equipment retire. In this regard, an E-waste Management Plan has been developed by PMO under the parent

project, which has set up the management system and procedures to track the use of electronic equipment procured under the World Bank project through their lifespans from procurement to final disposal. The same system will continue to be applied for the AF project

With exclusion criteria established in this ESMF (see chapter 4), the overall social risks of the proposed AF will be considered as Moderate.

Table 3-1 Environmental and Social Risk Screening for AF Activities

Component 3. Unemployment Assistance		
Component Description	Environmental/Social Risk	Mitigation
<p>Eligibility Criteria (1): The proposed component targets two new beneficiary groups; (i) informal workers who have never had formal employment and affected by a lockdown and (ii) formal workers who lost their job as a result of Covid19.</p> <p>Each assistance round is only open for 3-5 days and applicants would need to be aware of application criteria and application procedures.</p>	<p>Social exclusion: beneficiaries self-enroll in scheme, inclusion in scheme therefore dependent on eligible beneficiaries understanding eligibility criteria and having capacity to act on enrollment.</p> <p>Risk that disadvantaged or vulnerable people do not have equitable access to information about the cash transfer program, or technological requirements to apply and qualify for the assistance. GoF communication strategy reliant on messaging to those with active mobile phone service in addition to notifications in public media in two weeks lead up to application windows. Messages were communicated in all three languages used (English, iTaukei and Hindi).</p> <p>No environmental risks.</p>	<p>Use TA component of project to evaluate disadvantaged and vulnerable to access information about the program and based upon that develop protocols for improved communication programs.</p>
<p>Eligibility Criteria (2): Only fully vaccinated people are eligible for the assistance (first dose by time of first assistance round, and second dose by time of second assistance round).</p>	<p>Risk that disadvantaged or vulnerable people do not have equitable access to opportunities for COVID-19 vaccination. The vaccination rates are noted to be very high and the GoF provided a comprehensive vaccination outreach program.</p> <p>Vaccinations were provided at no cost. MWCPA reports there were no limitations in the roll out of the vaccination program associated with vaccine availability, storage/handling, nor delivery in the lead up to the UA application windows. At the time of the qualifying periods to apply for the first and second round of the assistance, vaccination rates were quite high at 95% with first dose for round 1 and 88% with second dose at round 2. However, the profile of those not vaccinated with respect</p>	<p>No further action.</p>

	<p>to vulnerability is not known. GoF reports a simultaneous vaccination program in all areas covered by the UA program, adequate supply of vaccines, adequate capacity for vaccine handling/distribution/delivery, outreach communications programs, and mobile teams that could also provide vaccinations at homes for those with disabilities. COVID-19 vaccination are publicly available and a condition to receive the conditional unemployment assistance. People with grounds for medical exemption, can obtain a vaccination exemption certificate from their doctor. Applicants could submit proof of exemption (via email to MOE) in lieu of vaccination when applying, though this information was not widely made available. MOE also allowed a leeway of 2 weeks after application in which applicants could be vaccinated.</p> <p>No environmental risks.</p>	
<p>Provision of grievance mechanism for persons wishing to avail of UA program.</p>	<p>Risk that a GRM is not established. Risk that that the GRM is not accessible, inclusive or responsive. A GRM was established within MOE to receive complaints and requests for review of unsuccessful applications. Complainants could lodge grievances/appeals by email or by calling one of seven hotline numbers. The contact details were publicized on the GoF Facebook page and various media platforms. During the peak period, the mobile phones were operational overnight. Complaints were typically addressed within two days. A noted shortcoming of the process was that rejected applicants were often not notified, and if notified, were not provided reasons for the rejection. Information on the number of complaints received, whether by men/women or by sector has not been collated.</p> <p>No environmental risks.</p>	<p>Use TA component of project to influence GoF policy on improved communication strategies to ensure that unsuccessful applicants for social protection programs are provided clear advice about the reason for the rejection together with details on how to appeal.</p>

<p>Access to Assistance: beneficiaries can only access assistance if they possess or have access to a mobile phone, a sim card, and have phone literacy</p>	<p>Exclusion from assistance: Fiji has high prevalence of mobile phone ownership (79% women and 84% men in the 15-49 age group); a minority will not meet these conditions and are potentially excluded from assistance. Those without access to mobile are likely to be the most vulnerable. SIM cards were provided free by the mobile phone service providers during the two rounds of the program. GoF has not assessed extent to which those without mobile phone were vulnerable and excluded from participation.</p> <p>No environmental risks.</p>	<p>Use TA component of project to influence GoF policy on improved inclusive approaches as well as monitoring general participation of disadvantaged and vulnerable and explore supplementary alternative means for lodging applications in future similar programs that do not rely on mobile phone and SIM card ownership.</p>
<p>Mechanism for Assistance disbursement: The component introduces a new institutional arrangement whereby MoE pay benefits to eligible people through mobile phone companies, Digicel and Vodafone</p>	<p>Unknown Institutional capacity of mobile phone companies to apply ESF in terms of information sharing, consultation, addressing grievances, monitoring and reporting – currently unknown.</p> <p>No environmental risks.</p>	<p>Assistance disbursement mechanism to be assessed against ESF, particularly ESS10 and ESS2</p>
<p>Working Conditions: The program involves employees of several Government agencies as two mobile phone service companies to administer and implement the program.</p>	<p>Risk that workers will not be paid minimum wage is low. Review of Fijian civil service salary bands indicates that all civil servants are paid above minimum wage (publicly disclosed). FNPF have confirmed that their workers are paid well beyond the Fijian Employment Relations Regulations. The FNPF salary is tied to the banking and financial sector. The salary is independently reviewed and adjusted every 3 years to stay competitive. All entities and workplaces must abide by the Employment Relations (National Minimum Wage) (Amendment) Regulations 2017. As per this requirement, Vodafone and Digicel pay their workers at least the minimum wage.</p> <p>The risk of child labor, underage workers and forced labor is low. These issues are prohibited under the Fijian Employment relations Act 2007, the Act governs all</p>	<p>No further mitigation required.</p>

	<p>stakeholders in this project by law.</p> <p>OHS risks are low. Project workers were engaging in low risk office work and stakeholder engagement activities. Risk of serious illness from COVID-19 infection amongst project workers is low due to high vaccination rates during the program timeframe.</p> <p>The risk that project workers cannot access a redress mechanism to file grievances is not fully assessed. Two of the key GoF agencies administering the program (MOE and NPNF) do have complaint mechanisms for staff, but availability of such for the other agencies administering the program is not known.</p> <p>No environmental risks.</p>	
<p>Protection of personal data. The application process included provision of personal data.</p>	<p>Risk that personal data collected does not adhere to appropriate personal data privacy standards is considered low. Right to confidentiality of personal information is guaranteed under the Fiji Constitution. Agreements between MOE and mobile phone service provider companies (SPs) receiving applications require the SPs to protect against loss, unauthorized access, use, modifications or disclosure of personal information. Applications included confirmation of consent for the Fijian Government to access the applicant's vaccination details. MOE only transfers the items of personal data from the application to partner Government agencies that is required for verification purposes.</p> <p>No environmental risks.</p>	
Component 4. Activation and Employment Support Programs		
Component Description	Environmental/Social Risk	Mitigation
<p>JFN2: to promote employment opportunities for vulnerable Fijians residing in rural areas through community-led interventions aimed at protection, restoration and rehabilitation of natural resources, expanding upon the government's original Jobs for Nature initiative.</p>		
<p>Eligibility Criteria – Village Cooperatives.</p>	<p>Adequacy of Inclusiveness: eligible cooperatives have</p>	<p>Assess communication channels and</p>

<p>Legally registered in compliance with Fijian law and jointly selected by DOE and MOE through an EoI process.</p>	<p>adequate information access to the program</p> <p>Reputational risks: track records of village cooperatives (including E&S related legacy issues)</p>	<p>information disclosure mechanism</p> <p>Assess the track records of the village cooperatives, with focus on legal and E&S performance</p>
<p>Wetlands protection: mangrove planting, seagrass planting, restoring waterways, waste and wastewater management;</p> <p>Riverbank rehabilitation and coastal bank protection: mangrove planting, vetiver grass planting; and</p> <p>Biodiversity enhancement: forest restoration, land upgrade through native tree planting, coral reef protection</p>	<p>Environmental sensitivity: Locations and scales are unknown at this stage. Possibility of sensitive environmental sites involved; and risk of introduction of invasive species, risk of introduction of pests and diseases by using seed stock or seedlings from ill-managed nurseries</p> <p>Moderate environmental risks and impacts: Likely small to moderate environmental impacts related to the plantation and rehabilitation works activities, such as dust, noise, waste management, soil erosion, surface vegetation damage, habitats disturbance, worker's safety and health, traffic disturbance and community safety, cultural heritage protection and chance-find procedures etc.</p> <p>Working condition and OHS for community workers: There are risks related to labor conditions (pay, hours worked, OH&S, access to grievance mechanism) are associated with the limited capacity of village cooperatives to apply regulated labor standards. There are also risks related to discrimination/favoritism in the recruitment process as well as risks of GBV, SEA and SH related to the general vulnerability and unequal power relations in the employment arrangements.</p> <p>Other social concerns</p> <ul style="list-style-type: none"> • Inequitable sharing of benefits with respect to disadvantaged and vulnerable participating 	<p>Screening process has been established as part of the ESMF (see ESCOP), with exclusion criteria to exclude activities with High/Substantial risks as defined in the WB ESF;</p> <p>E&S impact assessment requirements established in ESMF;</p> <p>A set of generic Environmental and Social Code of Practice (ESCOP) is developed in this ESMF for typical small works.</p> <p>Grant agreements with village cooperatives to include requirements to apply regulated labor standards regarding minimum age and pay and other working conditions; Code of Conduct covering prohibition of SEA/SH as part of the ESCOP; requirement to maintain clear records regarding wages and working hours; ensuring information about workers GM is made available. Contracts with contracted workers to set out their labor entitlements and how to access the labour grievance mechanism. DOE to provide guidance and training to village cooperatives on the ESCOP which includes the OH&S.</p> <p>Provision of information to beneficiary communities on work opportunities, eligibility and the grievance mechanism is</p>

	<p>communities through recruitment practices of contracted workers.</p> <ul style="list-style-type: none"> Land acquisition will be avoided and screened out. 	<p>described in the SEP.</p> <p>Grant applications and grant agreements with village cooperatives to include details of numbers of positions and those in priority beneficiary categories. MOE to monitor implementation of agreements with village cooperatives.</p>
Institutional capacity	Unknown capacity of village cooperatives to implement ESMF requirements	Capacity building plan designed as part of ESMF
New activities to be included in Component 2		
Component Description	Environmental/Social Risk	Mitigation
Capacity building and training activities for beneficiary identification, selection, eligibility verification, management of beneficiaries, effective service provision, fiduciary oversight, grievance redress mechanism, and monitoring and evaluation	<p>Little or no environmental risks;</p> <p>Adequate coverage of target groups;</p> <p>COVID-19 risks for group training activities</p>	<p>Proper TORs development and output monitoring/evaluation;</p> <p>COVID-19 protocol developed as part of ESMF (ESCOP)</p>

Based on above preliminary E&S risk screening, the overall residual E&S risks of the AF is considered as Moderate.

3.2 E&S Risks Management Approach

Given the potential E&S risks identified through the above screening process, the following E&S management approach are proposed under this ESMF and will be implemented during the AF activities implementation:

For the cash transfer operation of the **Component 3**, the potential social exclusion risks will be addressed through technical design of the implementation procedures. The following actions are recommended to be supported by the Project through its technical assistance:

- Further assess the effectiveness of application and assistance disbursement mechanism through participatory methods in-country, which could not be undertaken as part of the social audit.
- Influence GoF policy on improved inclusive approaches as well as monitoring general participation of disadvantaged and vulnerable and explore supplementary alternative means for lodging applications in future similar programs that do not rely on mobile phone and SIM card ownership.
- Future programs need to include a process of notifying applicants of the outcome of their applications along with reasons for rejection and how to seek further information or appeal.
- Evaluate disadvantaged and vulnerable access and apply for the program as well as develop systems for monitoring general participation of disadvantaged and vulnerable.
- Evaluate disadvantaged and vulnerable access information about the program and based upon that develop protocols for improved communication programs.
- Develop clear and transparent process on communicating outcomes of applications and how to appeal decisions.

For the environmental protection small works under the **Component 4**, screening will be conducted by first applying the exclusion list, then further screening the specific E&S risks to exclude “High” and “Substantial” risk activities; the screening process is outlined and included within annex 2. As per the screening guidance; E&S risks/impacts of the “low” and “moderate” activities under the component 4 would be readily identified and avoided/minimized and mitigated by applying the standard sets of mitigation measures included in the ESCOP template of this ESMF (see annex 5).

The ESCOP will require grant agreements with village cooperatives to apply regulated labor standards regarding minimum age and pay and other working conditions; Code of Conduct covering prohibition of SEA/SH; requirement to maintain clear records regarding wages and working hours; ensuring information about workers GM is made available and other requirements; see annex 5. Contracts with contracted workers to set out their labor entitlements and how to access the labour grievance mechanism. DOE to provide guidance and training to village cooperatives on use of the ESCOP, including OH&S.

MOE and DOE will provide public information about the program and grant application conditions and procedures. Beneficiary communities of grant recipient village cooperatives will be provided information about work opportunities, targeted beneficiary categories, eligibility requirements and the grievance mechanism as described in the Stakeholder Engagement Plan. Grant applications and grant agreements with village cooperatives will

include details of numbers of positions and those in priority beneficiary categories. MOE will monitor implementation of agreements with village cooperatives.

For the additional **technical assistance activities under Component 2**, as these are all Type 3 TA activities, there are minimum or no E&S risks envisaged. Potential E&S risks considerations will be screened and incorporated into the TORs of these activities, to achieve adequate coverage of beneficiaries to minimize the social exclusion risk. COVID-19 protocols will also be taken into account to minimize public health risks under current pandemic situation. The commitment to screen TA activities for ES risks and impacts is included within the project's ESCP.

4. E&S MANAGEMENT PROCEDURES

Except for Component 3, specific small works subprojects under component 4 and additional TA activities under component 2 will only be identified and implemented during the implementation stage, therefore, an E&S management procedure is established. PMU committed in the ESCP that the requirements set out in this procedure will be followed to manage the E&S risks and impacts of the multiple subprojects. PMU also committed to provide regular progress reports every six months on E&S performance to the Bank during the project implementation.

The E&S risk management procedure for the AF is shown in Figure 4-1.

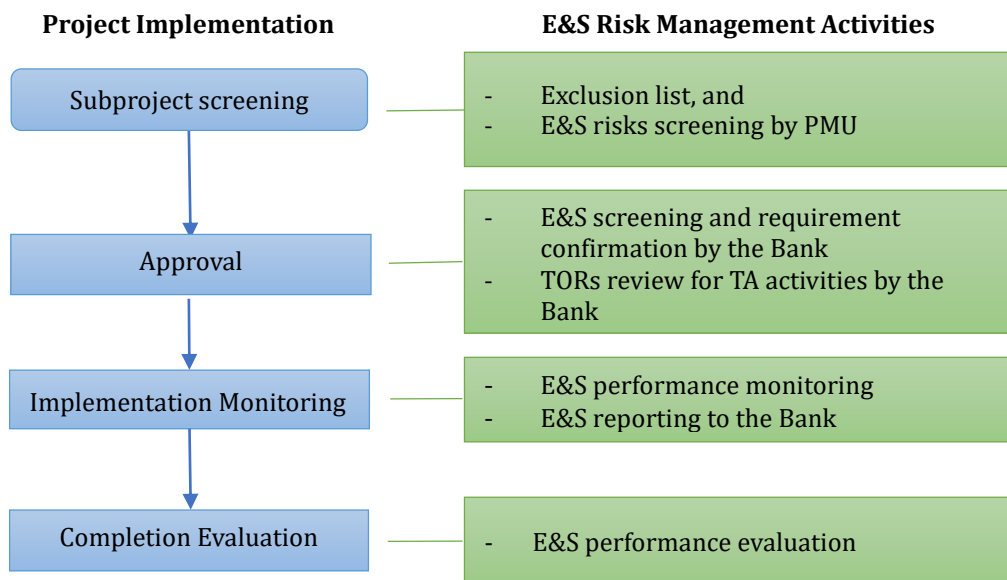


Figure 4-1 E&S Management Procedures

4.1 Subproject E&S Risk Screening

Component 4 includes multiple community-driven subprojects for environmental protection, which are small works for wetland protection, river bank rehabilitation and biodiversity enhancement. These subprojects are pro-environment activities that are unlikely to have significant environmental risks/impacts, there are potential adverse E&S risks involved in terms of locations and plantation/rehabilitation activities, especially given the fact that their specific locations and detailed contents are not known at this stage. The additional TA activities involve capacity strengthening activities that are anticipated to have minimum or no E&S risks. E&S screening for each TA activity will be conducted to identify potential E&S risks; mitigation measures will be incorporated into the specific TA planning and design as per the commitment in the parent project and AF ESCP.

For Component 4 activities, during implementation, PMU will review each subproject applications submitted by village cooperatives through DOE (the sample of application form is included in Annex 6), and conduct E&S screening according to the following two steps:

First, screening will be conducted against the **exclusion list** (see the box below). If the subproject falls into the exclusion list, then it should be excluded without further E&S screening.

Exclusion List

- Any subproject activity that would be classified as “High Risk” or “Substantial Risk” as per the classification system described in Annex 3 E&S Risk Classification Guidance;
- Significant conversion or degradation of critical natural habitats or critical cultural heritage sites;
- Plantation and rehabilitation activities that have a risk of introducing invasive species, pests or diseases into areas of natural habitat;
- Air, water, or soil contamination leading to significant adverse impacts on the health or safety of individuals, communities, or ecosystems;
- Workplace conditions that expose workers to significant risks to health and personal safety;
- Involuntary land acquisition;
- Involuntary restrictions to land, and/or involuntary physical or economic displacement of people or assets belonging to titled or non-titled people on a temporary or permanent basis;
- Large-scale changes in land use or access to land and/or natural resources;
- Adverse E&S impacts covering large geographical areas, including transboundary impacts, or global impacts such as greenhouse gas (GHG) emissions;
- Significant cumulative, induced, or indirect impacts;
- Activities that involve the use of forced or child labor;
- Marginalization of, discrimination against, or conflict within or among, social (including ethnic and racial) groups; or
- Activities that would have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation.

Second, if the proposed subproject does not belong to the activities in the exclusion list, then PMU will conduct further E&S risks and impacts screening according to the requirements of this ESMF, using Annex 2 Environmental and Social Risk Screening Form and Annex 3 E&S Risk Classification Guidance as tools, to determine the E&S risk classification.

Annex 3 E&S Risk Classification Guidance outlines that according to the Bank ESF, E&S risks of subprojects are classified into four types, i.e. “High Risk”, “Substantial Risk”, “Moderate Risk” and “Low Risk”. The E&S risk classification for the subprojects in the Project will follow the Bank’s ESF system.

For Component 4, only Low and Moderate risk subprojects are considered eligible for AF support, as such activities would have low to moderate environmental and social risks/impacts which can be clearly identified and readily avoided, minimized and mitigated with a set of generic mitigation measures as set out in Annex 5 ESCOP and Annex 4 Labor Management Procedure of this ESMF. Given the small amount of fund support to each subproject, and potentially high cost and demand for preparation of additional E&S documents as per ESF requirement, any subprojects that are classified as High or Substantial would be considered not eligible, and will be excluded from the AF financing.

4.2 Subproject Approval

For component 4 activities, after E&S screening, PMU shall provide the subprojects’ application documents and the E&S screening forms to the Bank for approval. The Bank task team will

review the subproject material to confirm the appropriateness of E&S screening results, and whether the standard ESCOP in this ESMF as well as the SEP and LMP would be sufficient for the community to manage E&S issues during the implementation, or any additional requirements that the Bank task team considers necessary.

For TA activities under component 2, PMU shall develop TORs with due consideration of relevant E&S risks, and provide the TORs to the Bank for review and approval as per the commitment in the ESCP.

4.3 Subproject Implementation Supervision and Reporting

During implementation of AF project, PMU will continuously monitor the E&S performance of the AF activities as part of overall implementation supervision. Specifically:

- **Component 3: Cash Transfer:** MOE PMU shall maintain and update as needed a Cash Transfer Operations Manual (CTOM) a guide for implementing the Unemployment Assistance (UA) Program. The CTOM is to meet the following objectives:
 - Provide operational clarity and guidance to decision-makers and implementers of the UA Program.
 - Enable all concerned agencies and partner organizations to understand the institutional arrangements, procedures, and scope of work in implementing the unemployment assistance.
 - Specify the roles, responsibilities, and accountabilities of the stakeholders in the UA Program operations.
 - Guide the UA Program operations to ensure consistency, timeliness, and accuracy.

The manual describes the UA Program, its features, rate of assistance, and the necessary details of the implementation cycles. It will set out each area in the 5-Point UA Program Implementation Cycle, namely, Outreach and Communication, Registration, Verification, Payment, Monitoring and Evaluation, to implement the program. In addition, the manual sets out Institutional Arrangement, Program Management Information System, and Financial Management for the WB Financing Environment, and Social (ES) Management.

- **Component 4: Unemployment Support:** The environmental and social specialist in the PMU, in cooperation with DOE, shall ensure that the ESCOP, SEP and LMP be fully incorporated into the subproject agreements with the village cooperatives which are legally bound to implement these documents.

During the subproject implementation, PMU shall, in cooperation with DOE, conduct periodic field visits to the subproject sites to supervise the E&S performance. In case inadequacy or violation of ESCOP is identified, PMU shall cause the village cooperative to undertake remedial actions to achieve compliance with the Bank's requirements. The PMU shall inform the Bank on identification of inadequacy and/or violations and provide details and a time bound corrective action plan within the six-monthly reporting to the World Bank.

If the PMU finds or is informed of any environmental or social accident that may have a significant adverse impact on the environment, communities, general public or workers in any subproject, it will notify the Bank within 48 hours and provide as much detailed information as possible about the accident, including measures taken or planned, and appropriate information provided by contractors and regulatory agencies. Subsequently, in accordance with the requirements of the Bank, PMU will prepare a report on the accident and propose any measures to prevent its recurrence.

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- **Component 2: TA activities:** The PMU shall ensure that the relevant E&S requirements in the TORs (if any) be properly implemented during the capacity building activities.

Throughout the AF implementation, the PMU shall report the overall E&S performance as part of the project progress report which shall be submitted on a six-month basis.

4.4 Subproject Completion and Evaluation

As part of the evaluation of the completion of the entire project, the PMU will summarize in the borrower's Implementation Completion Report (ICR) the E&S management performance through the entire process of implementation AF. The objective is to evaluate the actual performance, summarize experience and lessons learned, and provide inputs for the compilation of implementation completion report for the whole Project.

5. INSTITUTIONAL ARRANGEMENTS AND CAPACITY BUILDING

5.1 Organizational Structure for E&S Management

The implementation of the AF project will rely on the existing management system for the parent project, which include a Steering Committee (SC) with the participation of multiple institutions with the MOE as the leading implementation agency, and a Project Management Unit (PMU) under MOE joined by other implementation partners of line ministries. To support the effective implementation of the new components, the SC will now also include representatives from the five new agencies involved in implementation: FRCS, MOC, MOHMS, MOWE, and TSLB. One technical coordinator from each of the five agencies will also be appointed to support the PMU. This arrangement will continue helping harmonize and coordinate implementation of activities across various agencies. Further details will be updated in the POM.

The SC provides policy direction and guidance, facilitate the coordination among various agencies and programs, and help address the bottlenecks for project implementation. They will meet regularly to discuss the policy and implementation issues and carry out field visits as necessary.

The PMU established under MOE, in partnership with DOE, will be responsible for the day-to-day work on project management, coordination, financial management, procurement, monitoring and reporting, and environmental and social (E&S) risk management.

The implementation arrangements for Component 3 and Component 4 are summarized as follows:

Component 3: The component is implemented by PMU in close partnership of government agencies and the telecommunications sector. MOE signed cash transfer agreements with telecom companies (Vodafone and Digicel) who accept program applications through Unstructured Supplementary Service Data (USSD) for applicants in Viti Levu, and electronically transfer the grants to the individual mobile wallets (M-PAiSA and MyCash) for the approved beneficiaries . The telecom companies opened mobile wallets for applicants without existing accounts (refer to Box 1 for details). Multiple government agencies have been involved in the program for data validation: Fiji Revenue and Customs Service (FRCS) verifies the identity of applicants using Tax Identification Number (TIN) and Birth Registration Number (BRN); Ministry of Women, Children and Poverty Alleviation (MWCPA), Tertiary Scholarship and Loans Board (TSLB), and FRCS identify the recipients of their respective programs for deduplication; and MOHMS verifies the vaccination status of the applicants.

Component 4: The implementation of the component will be carried out through a partnership between MOE and DOE, as well as village cooperatives. Participating village cooperatives will be selected by DOE and MOE through an Expression of Interest (EoI) process. Grant agreements will include conditions related to the identification, training, selection, and employment of community members in the implementation of activities on the basis of pre-identified job profiles (e.g., low-skilled manual labor, administrative tasks, organized care for children of employed mothers). The component will reimburse the labor costs of selected village cooperatives to MOE. Contracts between MOE and village cooperatives will be developed in compliance with the environmental and social framework. The implementation of this component will be supported by technical assistance to be financed under Component 2 through trainings for workers employed by the project as well as an economic inclusion framework to ensure prioritization of vulnerable beneficiaries of social assistance and unemployment support for participation in employment opportunities created by the projects.

The PMU will maintain one environmental and social specialist and one environmental and social officer in the PMU throughout the implementation of the Project. One additional

environmental and social officer from Ministry of Environment is also assigned to the PMU to support the environmental and social management of Component 4 activities. The E&S specialist and the two national E&S officers will play the key E&S management functions of the PMU, with main responsibilities as follows:

- Monitor the implementation of commitments in the ESCP, and provide overall E&S performance reporting as part of the project progress report submitted to the Bank on a semi-annual basis;
- Review subprojects applications under Component 4 and conduct E&S screening following the procedures as established under this ESMF, and provide the eligible subprojects document package (including the E&S screening results) to the Bank for approval;
- Ensure the ESMF requirements are incorporated into the agreements and contracts with local communities for component 4 subprojects, and supervise the E&S performance of these subprojects during implementation;
- Prepare report to the Bank on any environmental or social accident that may have a significant adverse impact on the environment, communities, general public or workers within 48 hours;
- Review TORs for technical assistance activities to ensure potential E&S concerns are incorporated into the TORs, and follow up the TA process and outputs to ensure that relevant E&S issues are addressed according to the TORs requirements;
- Carry out stakeholder engagement activities as per the updated SEP;
- Monitor the implementation of LMP;
- Carry out E&S capacity building activities such as training, seminars as per the capacity building plan.

5.2 Capacity Building Plan for E&S Management

Fiji has relatively strong institutions and a reputation for a disciplined and well-educated civil service and pays for about 80 percent of its spending out of tax revenue. Fiji has recruited domestic and international experts to the public service on performance contracts and paid for them without donor support. According to traditional global indicators of governance, Fiji ranks relatively high on political stability and control of corruption. It has also shown it can develop and put in place significant reforms quickly when necessary and can adopt appropriate policies for the country.

Nonetheless, MOE and the implementation partners are new to World Bank IPF projects and not familiar with the World Bank project policies and procedures including the Environment and Social Framework (ESF). In view of the diverse technical and implementation capacity of the implementation partners, capacity building on E&S management for PMU staff and relevant stakeholders will be needed and carried out throughout the project implementation. A preliminary E&S capacity training plan is developed as follows:

Table 0-1 E&S Management Capacity Training Plan

Target	Scope of training	Objective	Trainer	Person-times	Method	Days / time	Frequency
PMU staff	<ol style="list-style-type: none"> 1. Bank ESF; 2. The Project's ESMF; 3. National E&S laws and regulations; 4. E&S mitigation measures and requirements; 5. Potential E&S risks screening; 6. Implementation of SEP and GRM; 7. Implementation of LMP. 	Strengthen the understanding of the ESF by the PMU staff which can get familiar with the requirements of the ESMF and improve project implementation capacity.	Experts with Bank project experience / Bank experts	10	Lecture	1	At Project launch; and once every year during implementation
Project implementation partners	<ol style="list-style-type: none"> 1. Bank ESF and the project's ESMF; 2. National E&S laws and regulations; 3. E&S mitigation measures and requirements; 4. Implementation of SEP and GRM; 5. Implementation of LMP 	Strengthen the ESF/ESMF implementation capabilities of the partners	PMU international E&S specialist, other domestic and overseas experts	10-20	Seminar	1	At Project launch; and once every year during implementation
Subproject communities	<ol style="list-style-type: none"> 1. ESMF and ESCOP; 2. National E&S laws and regulations; 3. Implementation of SEP and GRM; 4. Implementation of LMP 	Strengthen E&S management knowledge and ability of the communities	Experts with Bank project experience/PMU staff	100	Classroom training	1	Prior to start of subprojects
Contractors of TA activities	<ol style="list-style-type: none"> 1. ESMF requirements; 2. Implementation of SEP and GRM; 3. Implementation of LMP 	Strengthen the understanding of E&S measures and requirements	Experts with Bank project experience / PMU staff	20	Classroom training	1	Before commencement of TA activities

6. STAKEHOLDER ENGAGEMENT

6.1 Consultation, Participation and Information Disclosure

MOE will be responsible for carrying out stakeholder engagement activities; working closely together with the FNPF communications unit, DOE and other key stakeholders including local government units and media outlets. A Project Management Unit (PMU) housed in MOE will be set up and operated in an efficient, effective and inclusive manner. The PMU will be responsible for the day-to-day work on project management, coordination, financial management, procurement, monitoring and reporting, environmental and social (E&S) safeguards and project grievance redress. The PMU will coordinate the World Bank implementation support mission twice a year, prepare annual work plan and budget, and prepare semi-annual progress report, and the project MTR report and the government completion report. The MOE full-time designated international E&S specialist will oversee coordination and implementation of E&S commitments as per the Environment and Social Commitment Plan (ESCP) and one or more E&S officer(s) from the Climate Change Department will be assigned to support the E&S Specialist. The E&S Specialist will have previous experience working with development agencies (ideally with the World Bank) and a key component of their role will be to build capacity of the supporting Climate Change Department E&S officer(s). Both Specialists will be recruited no later than 60 days after project effective date. There are designated communications units in both the MOE and FNPF that are doing ongoing stakeholder engagement and information sharing. MOE will collaborate with DOE for communications on the JFN2 Program, including outreach to the public regarding dissemination of the program information and application process. DOE will work directly with grant recipient village cooperatives and their communities to provide detailed information about the operation of the program, including beneficiary participation requirements, labor standards requirements set out in the LMP and the grievance mechanism. The designated ES project staff will work closely with the existing communications units to monitor and document SEP implementation.

The ESCP, ESMF, LMP and SEP are publicly disclosed on the websites of the World Bank and MOE. Award of grants for JFN2 will be disclosed on the DOE website within 30 days of award.

6.2 Grievance Mechanism

The main objective of a Grievance Mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Minimizes the need to resort to judicial proceedings.

Due to the differences in the programs, affected persons and institutional arrangements, separate grievance mechanisms are established for Components 1 and 4.

The grievance process that has been in place for Component 3 is described separately in the Social Audit for that activity. Component 3 is entirely retroactive financing, and no future payments will be made under the component. In summary the MOE established and maintained a GRM for the Unemployment Assistance. The Fiscal Policy, Research, and Analysis Department is assigned to receive, process, and address queries and grievances. People were able to call on seven mobile phone numbers that were managed by the MOE staff members or send email to submit their grievances. The phone numbers of these hotlines are available on the Fiji Government's Facebook page and various media platforms. During the peak period, the mobile phones were operational overnight. For 'genuine cases' (for example, applicants are eligible, but rejected), the staff members noted the phone numbers and the issue and relayed the message to the person in charge of the data and liaised with the partner agencies for verification. Upon receiving the confirmation from these agencies, the MOE either approved or rejected the application accordingly. For cases where the complainant did not meet the criteria, the MOE staff explained the reasons for their ineligibility. Most common grievances were related to non-eligibility due to the SIM card used to apply for the benefit not being registered in the name of the applicant. The MOE has continued handling the 'genuine cases' as well as other grievances.

Details of the GM are set out in the SEP and summarized below.

6.2.1 Description of Grievance Mechanism for Component 1

The Project will use the established FNPF complaints and feedback system to receive, resolve and document all project related grievances. The established grievance mechanism is linked to all project activities, and is widely publicized through the FNPF. Reference to the mechanism is also linked to the MOE government website and Facebook page.

The overall GM will be managed by FNPF staff in collaboration with the PMU Environmental and Social (ES) Specialist. The ES Specialist will work closely with the FNPF Human Resources unit who are responsible for managing the complaints and feedback system.

Confidentiality and complaints of a sensitive nature. All complaints are treated with the utmost confidentiality and any information provided is used strictly for the purposes of resolving grievances. FNPF retain professional councilors within the human resources unit, for staff, members of the general public. Complaints received pertaining to gender-based violence, sexual assault or harassment are referred to these trained professionals.

A separate whistleblower scheme is also available to the public to report grievances relating to accountability and integrity. Project stakeholders are invited to report concerns relating to fraud, theft, use of inside information, bribes, and gifts (etc.), inappropriate disclosure of confidential information, conflicts of interest and illegal acts.

The National Environmental and Social Officer designated within the PMU will track and classify project related grievances and liaise with the grievance mechanism managed by FNPF.

6.2.2 Description of Grievance Mechanism Channel for Component 4

The project has established a grievance mechanism within MOE and DOE to receive,

resolve and document all project related grievances related to the JFN2 program. Management and monitoring of the grievance mechanism is the responsibility of the PMU and designated ES staff. Potential complaints may be of three main categories:

(i) Complaints related to the environmental impacts of the JFN2 program works.

These complaints will be received and addressed by DOE.

(ii) Complaints related to operation of the JFN2 program.

These complaints will be received and addressed by MOE. Related grievances may include such matters as the selection of and approval of grant applications and operation of the village cooperatives in relation to awarded grants. The latter may include issues such as distribution of benefits within recipient communities and use of grant funds.

GM timeframe. The process of grievance resolution is not expected to take longer than 10 working days for normal complaints. Initial assessment of the complaint will seek to confirm if the issue is related to the project funded activity and confirm other relevant details. Complaints that require further investigation may take longer, in which case the complainant will be advised.

Confidentiality and complaints of a sensitive nature. All complaints are treated with the utmost confidentiality and any information provided is used strictly for the purposes of resolving grievances. Complaints received pertaining to gender-based violence, sexual assault or harassment are referred to trained professionals in the Ministry of Women.

(iii) Complaints related to labour conditions of workers by village cooperatives that have been awarded grants under the program.

These complaints will be lodged to the grievance mechanism at MOE for workers described separately in the Project Labor Management Procedures.

The operation of the project's Grievance Mechanism will be regularly monitored. Patterns of complaints will be assessed for required adjustments or corrections to the project's operation or requirements.

ANNEX 1 SOCIAL AUDIT FOR THE RETROACTIVE FINANCING OF COMPONENT 3

SOCIAL AUDIT THE FIJI GOVERNMENT'S UNEMPLOYMENT ASSISTANCE CASH TRANSFER PROGRAM

INTRODUCTION

The Social Audit examines the Fiji Government's Unemployment Assistance Cash Transfer Program to be financed by the World Bank as part of proposed Additional Financing of the Fiji Social Protection COVID-19 Response and System Development Project.

This activity supported cash payments to the unemployed who lost jobs or livelihood in formal and informal sectors because of the COVID-19 pandemic. Eligible Fijians received FJD 120 per month for a period of six months from August 2021 to January 2022. Eligible beneficiaries are those unemployed in the formal sector (across Fiji) without sufficient Fiji National Provident Funds² (FNPF) General Account balances, or those affected in the informal sector in Viti Levu (Fiji's largest island) due to the area being deemed by the Government to be disproportionately affected by movement restrictions and business closures as a result of the pandemic. Eligibility was restricted to beneficiaries that are not current recipients of other government supported transfers, including social assistance payments and have been vaccinated against COVID-19. The unemployment assistance payments were made in two assistance rounds for which eligible people could apply in August and October 2021 on the condition that they had received the first and second doses of the COVID-19 vaccine, respectively. No future payments will be made under this scheme. The AF will provide retroactive financing in the amount of US\$40 million for Component 3, subject to the World Bank Board approval, which is about 37 percent of the total government budget. Since the AF will be signed after the actual payments have taken place, this component will rely entirely on retroactive financing, up to a share of 80 percent of the total IDA financing.

The purpose of the Social Audit is to assess the activity against the requirements of WB Environment and Social Framework (ESF) standards and providing recommendations for improvement for future similar GoF programs. The ESF standards found to be most relevant were ESS1 (Assessment and Management of Environmental Risks and Impacts), ESS2 (Labor and Working Conditions), ESS10 (Stakeholder Engagement and Information Disclosure). The issue of protection of personal data was also considered. Methodologies to prepare the report include review of GoF reports, media releases, and information available their websites; information provided by Vodafone and Digicel in response to questions; publicly available information in the media and websites; and consultations with relevant GoF personnel in relevant agencies, especially the Ministry of Economy, Ministry of Health. Given movement restrictions in place during the preparation of the social audit, other participatory means such as consultations with people from the public were not possible.

Key considerations explored in the report include:

- Extent that disadvantaged and vulnerable persons were included or excluded in the program benefits.
- To what extent were stakeholders (especially potential beneficiaries) adequately engaged and received relevant information.
- Extent was there an appropriate grievance mechanism in place

² FNPF is a type of social security fund for which all employers of workers in the formal sector are obliged to contribute for their employees. The fund comprises a reserved account and general account, the latter of which may be drawn down from in cases of need.

The report is structured in three general sections covering an overview of the assistance program, assessment of the program against the relevant ESF requirements and a summary of recommendations for the Government's consideration for future similar programs.

I. OVERVIEW OF THE PROGRAM

As part of the COVID-19 Economic and Response and Recovery Plan, the Government of Fiji (GoF) announced, on July 16, 2021, unemployment support in the form of cash transfers to the unemployed who lost jobs or livelihoods in formal and informal sectors because of the COVID-19 pandemic. Those in the formal sector without sufficient General Account balance and those affected in the informal sector will be eligible for \$120 per month for six months from August 2021 to January 2022 directly paid through the Government. The GoF has allocated \$200.0 million for the "Unemployment Assistance Program" in the FY2021-2022 budget.

The first payment of FJD 360 was made in August 2021 to cater for three months ending in October 2021. This assistance was only provided to eligible Fijians who have received their first dose of vaccination in August. The second payment of FJD 360 was paid out in November to cater for three months ending January 2022. It was only paid to eligible Fijians who are fully vaccinated before October 31, 2021. Income support is a key focus in the GoF's COVID-19 Economic Response and Recovery Plan.

The target beneficiaries of the UA Program are the unemployed in the formal sector across Fiji without sufficient FNPf General Account balances, and those affected in the informal sector in geographic locations affected by movement restrictions and business closures in Viti Levu. Current recipients of other government-supported transfers, including social assistance payments, are not eligible for the UA program. Formal sector employees qualified for FNPf withdrawals under the previous pandemic-related unemployment benefits and continue to have a sufficient General Account balance will remain eligible to withdraw \$220 fortnightly from their accounts. This also includes affected formal sector employees outside Viti Levu. Employees who do not have a sufficient FNPf General Account balance and those who do not prefer to access their General Account can apply for the UA program. Individuals whose employment income has not been affected by the pandemic, as well as who receive other forms of government assistance, are not eligible for this income support. For the second round of assistance, MOE added a criterion that the SIM card used to lodge the application, must be registered in the name of the applicant. This was added as an additional means of ensuring the identity of the applicant as SIM card registration involves an identity verification process.

For ease of access, funds are deposited directly into the MPAiSA or MyCASH wallets of eligible beneficiaries. The GoF, through the MOE, signed cash transfer agreements with telecom companies Vodafone and Digicel, who accept program applications through Unstructured Supplementary Service Data (USSD) for applicants in Viti Levu, and electronically transfer the grants to the individual mobile wallets (M-PAiSA and MyCash) for the approved beneficiaries. The telecom companies also opened mobile wallets for applicants without existing accounts. The recipients can withdraw cash or purchase items from registered MPAiSA and MyCASH outlets.

The UA Program has a 5-Point Implementation Cycles: Outreach and Communication, Registration and Application, Verification, Payment, and Monitoring and Evaluation. Figure 1 shows the summary features and activities in each process. Each process will be discussed further in the succeeding chapters.

Figure 1. UA Program Implementation Cycles

Outreach communication	Registration /Application	Verification	Payment	M&E
<ul style="list-style-type: none"> • Media • Press conference • Fiji Government Facebook 	<ul style="list-style-type: none"> • Dialing 161# in Viti Levu for both formal and informal sectors (USSD channel, one application using one SIM card) • FNPF App outside Viti Levu for formal sector only 	<ul style="list-style-type: none"> • MOE: lead, coordinate, review, approve • Telecom: location of registration in Viti Levu • FRCS: identity (name, TIN, BRN) • FNPF: affected FNPF contributions, not a recipient of FNPF pension, not a civil servant • MWCPA: not receiving social welfare assistance • TSLE: not receiving education allowance • MOH: vaccination (first Jab, 2nd Jab, location) 	<ul style="list-style-type: none"> • MOE: list of approved applicants (name, phone#) • Vodaphone and Digicel: payment to digital wallets; withdrawal 	<ul style="list-style-type: none"> • MOE real-time access to the portal of payment provider • Payment providers reporting to MOE • Call center of payment providers on payment related questions • Help line in MOE on policy questions and grievance • Compliance audit for first payment is being planned

Institutional Arrangement

The implementation of the UA Program is led by the Ministry of Economy (MOE). The MOE works in partnership with Fiji Revenue and Customs Service (FRCS), Fiji National Provident Fund (FNPF), Tertiary Scholarship, and Loans Board (TSLB), Ministry of Women, Children and Poverty Alleviation (MWCPA), Ministry of Health and Medical Services (MOH), Ministry of Communications (MOC), Vodafone, and Digicel.

The MOE works with telecommunication companies in collecting the applications and payment of successful applicants. The coordination mechanism between MOE and the telecommunication companies for the payment of successful applicants is as follows: The GOF transfers the Funds in the total lump sum amount to telecommunication's trust account for the benefit of the Beneficiaries. Upon authorization from the nominated officer of the GOF, the telecommunications company disburses the subsidy to the designated mobile money accounts of the beneficiaries.

Specific obligations of the telecommunication companies are as follows:

- 1) They must establish a toll-free message and voice code to the number "161#" for users for the Program ('Short code');
- 2) They must make the Short code available 24 hours and 7 days a week for the duration of the Program;
- 3) They must not use the Short code for any purpose other than the Program for the duration of this Agreement;
- 4) They must submit a list of Beneficiaries who message or call on the Short code, with the required information to the Government daily for the duration of the Program for verification by the Government.
- 5) They must transfer the subsidy to the verified list of beneficiaries within 24 hours of receipt of the list from the government

The MOE coordinates closely with FRCS, FNPF, TSLB, and MWCPA in the verification process.

FNPF's Standard Operating Procedure was used to clearly demarcate the roles and responsibilities of FNPF in the verification and the handling of client's privacy. The coordination mechanism for the verification of applications is as follows: Upon receiving the applications, MOE cleans the list of applicants and will then forward it to the partner agencies to verify that the applicants are not employed, civil servants, receiving social welfare benefits, and receiving student allowances and that the TIN they have is in FRCS database for identification purposes.

Specific roles of other agencies involved are:

- 1) Fiji Revenue and Customs Service (FRCS) – verify name, TIN, date of birth, and birth registration number;
- 2) Fiji National Provident Fund (FNPF) – verify that the applicant is:
 - currently unemployed and FNPF contribution is not regular in last 3 months;
 - not a recipient of FNPF pension; and
 - not a civil servant.
- 3) Tertiary Scholarship and Loans Board (TSLB) – verify that the applicant is not under TELS/Toppers and not receiving regular allowances. Applicants only receiving bus fare allowance qualify for this assistance;
- 4) Ministry of Women, Children and Poverty Alleviation (MWCPA) - verify that the applicant is not receiving any form of social welfare assistance; and
- 5) Ministry of Communications ('MOC') and Ministry of Health and Medical Services ('MOH') – verify the vaccination status of the applicant

Outreach and Communication

The Fijian Government made official public announcements about the rollout of the UA Program through official GoF functions and press and media conferences. More information about the program is made available on the Fijian Government Facebook page, which had a wide audience. Program partners Vodafone and Digicel send out blast SMS messages³ to all potential beneficiaries residing in the target areas, so people are informed adequately in advance on the opening and closing dates of the application period including information on how to apply for the assistance on the platform.

Through this massive information dissemination, the eligibilities and requirements for registration to the UA Program are made known to the targeted beneficiaries two weeks before the initial opening of the application. This provides applicants with enough time to prepare and gather all the necessary data and requirements for the program. Aside from this, MOE provides a UA Program hotline with seven mobile phones manned by staff dedicated to the program who receive grievances and provide assistance to the prospective applicants for them to provide the correct information when the application opens to avoid any administrative issues in the later phases.

Registration and Application

In order to access unemployment assistance, eligible beneficiaries must register to the UA Program. The MOE sets the application period for the first and second rounds of the assistance. The application window is open within the given time frame. For the first round of assistance, the application period opens on 9 August at 9 am and closes on 11 August at 5 pm. The application for the second round was available from October 11 to 15, 2021. While contingencies for extension of the deadlines were included in planning in the event of the platforms crashing, the platforms operated as planned.

³ An affordable web-based SMS texting service that allows you to easily and simultaneously send text messages to a large number of cell phone users utilizing an automated messaging system.

Interested affected individuals, 18 years and above, must contact “161#” (i.e., USSD channel) for Viti Levu and use the “myFNPF” app for the formal sector outside Viti Levu and provide all the mandatory information. Both platforms collect the same information. However, information received on the myFNPF platform is for those formal sector workers, i.e. FNPF members residing outside of Viti Levu. All the applications received on the myFNPF app were directly sent to FNPF for assessment and later on, the listing was made available to the Ministry of Economy for payment.

It is important that individuals applying for this assistance gather first all the required information since incomplete submission or submission containing incorrect information may result in a rejection of an application.

- Full name;
- Birth registration number (BRN) or citizenship number;
- Date of birth;
- Tax Identification Number (TIN);
- FNPF number, if any;
- Voter identification number; and
- Home Address.

Both the TIN and BRN were compulsory requirements in the application. The Government uses these IDs to verify the applicant's identity and negate any possibility of double-dipping from the system.

The UA Program is made available only to eligible Fijians who were vaccinated. Applicants needed to receive the first dose of vaccine by August 31 to be eligible for the first round of unemployment assistance and be fully vaccinated by October 31 for the second round. Applicants were required to declare whether they have received their first/second doses of vaccination, the location(s) of vaccination, consent, and lastly, statutorily declare they are providing correct information. However, prospective applicants will be given two weeks grace period to be vaccinated. MOE might also consider applicants who were not able to receive the second dose due to medical reasons provided they were able to present a supporting document through email to the MOE.

ACTIVITIES	TASKS	RESPONSIBLE AGENCIES/ UNITS
1. Opening of the application period	1. Create a USSD channel/Open MyFNPF App window where applicants could access to register. 2. Accept applicants.	Vodafone and Digicel FNPF
2. Screening of applicants	1. Create a master list of applicants. 2. Share the master list of applicants to the MOE.	Vodafone and Digicel FNPF

Verification

In coordination with partner agencies, the MOE validates the applicant's information.

The Telecom companies screen the application outside Viti Levu using the GPS of applicants. They

share the application information, and the SIM registration information in the MOE in Excel format via email.

MOE cleans and organizes the applications in a master file once the raw data is received from the telecommunication companies. The data is then forwarded to Fiji Revenue and Customs Service (FRCS) to verify the TIN details and confirm the identity of the applicant. Automated verification is done by FRCS using their existing system where Excel-cleaned TINs of the applicants are a match to its TIN database. For unmatched TIN, BRN matching will be used to get the correct TIN. FRCS will then send back to MOE the verified and not verified applicants.

Once the MOE receives verified TIN details from FRCS, it then consolidates the details in the master sheet and forwards the details to other partner agencies: FNPf, DSW, TSLB, MWCPA, and Ministry of Health for further verification.

The FNPf will verify (using the FNPf number to match data) that the applicant is:

- currently affected and FNPf contribution is not regular in the last three months;
- not a recipient of FNPf pension; and
- not a civil servant.

The TSLB verifies that the applicant is not under TELS/Toppers and not receiving regular allowances (using TIN to match data).

The Ministry of Communications/Digital Fiji and MOH verifies if the applicant is vaccinated (using BRN to match data).

The DSW/MWCPA verifies if the applicant is not receiving any form of social welfare assistance. Since there is no consolidated DSW beneficiary database (only regional database has full information of beneficiaries), using TIN/BRN (or phone number, names, DOB, etc.) for data matching is a challenge. The IT office and field staff divide data by region and manually verify the information.

Partner agencies send back the Excel file with verified information (i.e., eligible/not) to MOE. Once the verification is received from FNPf, MWCPA, FRCS, TSLB, MOC, and MOH, it is consolidated in the database by MOE. The assessment is carried out by MOE staff on MS Excel. Those applicants verified to be either employed, receiving social welfare benefits, receiving student allowances, being a civil servant, not vaccinated, under 18 years old, and not providing correct TIN and BRN details are deemed ineligible in the system as per the eligibility criteria. Afterward, applications are checked for any duplication through the TIN. The payment of assistance is only made on one TIN on the very first application sorted by time of application.

ACTIVITIES	TASKS	RESPONSIBLE AGENCIES/ UNITS
1. Finalization of the master list for verification	<ol style="list-style-type: none"> 1. Clean the master list of applicants received from the partner telecom companies. 2. Share the final master list with several agencies for verification of specific information. 	MOE
2. Verification of individual applicants in the master list	<ol style="list-style-type: none"> 1. Verification of identity and deduplication using TIN and citizen registry. 	FRCS

	<p>2. Verification of eligibilities of applicant:</p> <ul style="list-style-type: none"> • currently affected and FNPF contribution is not normal in last 3 months, not a recipient of FNPF pension; and not a civil servant • not under TELS/Toppers and not receiving normal allowances • not receiving any form of social welfare assistance • vaccinated 	<p>FNFP</p> <p>TSLB</p> <p>DSW/MWCPA</p> <p>MOH</p>
3. Preparation of the Final Beneficiary List	<p>Consolidation of the verified and not verified applicants:</p> <ul style="list-style-type: none"> • Preparation of payroll for successful applicants • Preparation of notice for unsuccessful applicants 	MOE

Applicants were not notified whether their applications were successful or rejected, with people being made aware of successful applications through receipt of payment in to their digital mobile wallet accounts. Needless to say, unsuccessful applicants were not automatically advised of the reasons of their rejection.

Payment

The UA Program is designed to deliver cash assistance swiftly. It is targeting payment of successful applicants within two weeks after the closing of the application period. Once the list of verified beneficiaries is consolidated by the MOE in a database, the head FPRA and the PSE approve the final beneficiary list. The first payment of \$360 was made on 23 August 2021 to cater for August, September, and October 2021. The second payment of \$360 was paid out in November to cater for November and December 2021, and January 2022.

The MOE share the final beneficiary list, consisting of the name and phone number to telecom companies, and transfer money to MOE's mobile wallet at M-PAiSA and MyCASH. The MOE will approve the transfer from their account to individual beneficiary accounts. The Telecom companies manage the distribution of the cash assistance to the beneficiaries through their respective digital mobile wallet platforms. It makes digital payment transfers to the beneficiary's mobile wallet at one time, either through M-PAiSA or MyCASH. During major payments, the Fiji police force assists in controlling the crowd outside of Vodafone's and Digicel's branches, although not requested by the Ministry of Economy.

For applicants without a mobile wallet, new low-risk accounts are created. General banking verification requirement (Know Your Customer or KYC) is not required for a mobile wallet, as it is verified when activating/registering SIM. Also, village chief certificates, etc. are accepted as proof of identity.

Once payment is made to an individual mobile wallet, Telecom companies submit payment reports to the MOE. Beneficiaries receive SMS and can withdraw at the Vodafone or Digicel branches or make payments digitally using QR codes on their mobile phones.

ACTIVITIES	TASKS	RESPONSIBLE AGENCIES/ UNITS
1. Preparation of payment	Approval of payroll for all successful applicants.	FPRA head and the PSE
2. Transfer of funds to the digital account of the MOE	1. Share the final list of beneficiaries to partner telecom companies for payment. 2. Transfer of money to M-PAiSA and MyCASH.	MOE
3. Payment of the beneficiaries	Create new low-risk accounts for successful applicants without a mobile wallet. 1. Transfer of money to beneficiary's mobile wallet, either through M-PAiSA or MyCASH.	Vodafone and Digicel
4. Liquidation of funds	1. Submit payment reports to MOE 2. Cross-matched with the MOE list of approved for transfer.	Vodafone and Digicel MOE

Complaints Process/Grievance Mechanism

A complaints process was set up within MOE to receive, process and address grievances for applicants whose applications were unsuccessful or not able to be processed. Grievances could be lodged via a hotline number or by email to designated receiving MOE staff. There were seven hotline numbers managed by the staff members at the Fiscal Policy Division of the Ministry of Economy. The phone numbers of these hotlines were made available on the Fiji Government's Facebook page as well as the various media platforms. During the peak period, the mobile phones were operational overnight.

The designated MOE screened the complaint and if it was due to disagreement over assessment of information provided, they completed a form requesting the application be re-verified by the relevant partner agencies. Upon receiving the confirmation from these agencies, MOE either approved or rejected the application accordingly. For cases where the complainant did not meet the criteria, MOE staff explained the reasons for their ineligibility. Most complaints were re-assessed and response provided to the applicant within two days.

Most common grievances were related to non-eligibility due to not being completely unemployed or due to the SIM card used to apply for the benefit not being registered in the name of the applicant. Information on the number of complaints received, whether my men/women or by sector has not been collated.

II. ASSESSMENT OF THE PROGRAM AGAINST ESF REQUIREMENTS

The matrix below provides an assessment of the unemployment assistance program against the ESF standards.

Environmental and Social Due Diligence			
<p>Introduction and rationale: This environmental and social due diligence has been undertaken in accordance with guidance set out under ESS1 para 3-5 and para 30-35. Specifically, the due diligence considers, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts of the project, including those specifically identified in ESS1-10.</p> <p>This due diligence exercise was performed by MOE. The project social and environmental risks assessed here relate to the conditional cash transfers for unemployed. Note that project funds will be allocated to retroactive financing of this cash transfer component.</p> <p>The following table summarizes the environmental and social due diligence assessment against the ESF. The breadth, depth, and type of analysis was deemed appropriate given the nature and scale of the activity, and the potential environmental and social risks and impacts that could result.</p>			
<u>ESS1: Assessment and management of Environmental and Social Risks and Impacts</u>	Potential Risk	Assessment	Recommendations
<p>The borrower will conduct an ES Assessment of the proposed project activity</p> <p>Undertake stakeholder engagement and disclose appropriate information in accordance with ESS10</p> <p>Conduct Monitoring and Reporting on the ES performance against the ESSs</p>	<p>Risks summarized in ESS2-10 Key risks relate to cash transfers (retroactive activities)</p>	<p>Due diligence completed on the existing cash transfer system.</p> <p>Assessment summarized in ESS2-10</p> <p>Significant benefits were provided to the vulnerable and unemployed through the program. However, there are aspects that require further assessment as well as systems improvements, especially with respect to monitoring and evaluation, ensuring equitable benefit sharing and information communication for disadvantaged and vulnerable.</p>	<p>Specific recommended measures are set out below.</p>
<p>Adopt differentiated measures so that the disadvantaged or vulnerable, are not disadvantaged in sharing development benefits and opportunities resulting from</p>	<p>Risk that disadvantaged or vulnerable people do not have equitable access to opportunities for COVID-19 vaccination, information about the cash transfer program, or</p>	<p>All beneficiaries were unemployed, but the extent to which disadvantaged and vulnerable were able to equitably participate is not known. If, for example, poor and unemployed were recipients of other GoF income replacement assistance programs, they would not have been eligible for the UA program.</p>	<p>Use TA component of project to assess further the participation of eligible disadvantaged and vulnerable in the program.</p>

the project.	technological requirements to apply and qualify for the assistance.		
	<p>Only vaccinated people are eligible for the assistance (first dose by time of first assistance round, and second dose by time of second assistance round).</p> <p>Risk that disadvantaged or vulnerable people did not have equitable access to opportunities for COVID-19 vaccination.</p>	<p>The vaccination rates are noted to be very high and the GoF provided a comprehensive vaccination outreach program.</p> <p>Vaccinations were provided at no cost. MOHMS reports there were no limitations in the roll out of the vaccination program associated with vaccine availability, storage/handling, nor delivery in the lead up to the UA application windows. At the time of the qualifying periods to apply for the first and second round of the assistance, vaccination rates were quite high at 95% with first dose for round 1 and 88% with second dose at round 2. However, the profile of those not vaccinated with respect to vulnerability is not known. GoF reports a simultaneous vaccination program in all areas covered by the UA program, adequate supply of vaccines, adequate capacity for vaccine handling/distribution/delivery, outreach communications programs, and mobile teams that could also provide vaccinations at homes for those with disabilities. COVID-19 vaccinations are publicly available and a condition to receive the conditional unemployment assistance. People with grounds for medical exemption, can obtain a vaccination exemption certificate from their doctor. Applicants could submit proof of exemption (via email to MOE) in lieu of vaccination when applying, though this information was not widely made available. MOE also allowed a leeway of 2 weeks after application in which applicants could be vaccinated.</p>	No further action.
	Intended beneficiaries can only access assistance if they possess or have access to a mobile phone, a SIM card, and	Mobile phone ownership and usage was a potential limiting factor for participation. Mobile phone usage is high and usage was affordable during the period covered under the study. However, GoF has not assessed	Use TA component of project to influence GoF policy on improved inclusive approaches as well as monitoring general

	<p>have phone literacy.</p>	<p>extent to which those without mobile phone were disadvantaged and vulnerable and excluded from participation.</p> <p>Fiji has high prevalence of mobile phone ownership (79% women and 84% men in the 15-49 age group); a minority will not meet these conditions and are potentially excluded from assistance. Those without access to mobile are likely to be the most vulnerable. SIM cards were provided free by the mobile phone service providers during the period of the program upon presentation of valid photo ID (SIM card registration in the applicant's name became a condition during the second round).</p> <p>Vodafone has made it quite affordable for Fijians to own a mobile phone through price subsidies. The penetration rate in terms of connections vs population is a good indicator of penetration of mobile phones and accessibility in Fiji.</p> <p>The average price of a basic phone would be \$49 and during promotions this can go down to \$39. The minimum to keep a SIM card operational is a \$6 top-up to keep a sim card active for 3 months and customers can top-up for as low as \$1 through the multiple top-up channels.</p> <p>The geographical mobile network coverage in Viti Levu is 99% barring some black spots in difficult geographical terrain areas.</p>	<p>participation of disadvantaged and vulnerable and explore supplementary alternative means for lodging applications in future similar programs that do not rely on mobile phone and SIM card ownership.</p>
	<p>Mechanism for Assistance disbursement: The component introduces a new institutional arrangement whereby MoE pay benefits to eligible people through mobile</p>	<p>The mobile phone companies seemed to be able to technically provide the service of receiving applications.</p> <p>Unknown Institutional capacity of mobile phone companies to apply ESF in terms of information sharing, consultation, addressing grievances, monitoring and</p>	<p>Further assess the effectiveness of application and assistance disbursement mechanism through participatory methods in-country as part of TA activities, with the aim of</p>

	<p>phone companies, Digicel and Vodafone.</p> <p>Each assistance round is only open for 3-5 days and applicants would need to be aware of application criteria and application procedures.</p>	<p>reporting – currently unknown.</p> <p>A review the frequency of applications received over each day of the application windows, shows a peak of applications in the first day which gradually decreased through the application windows. This is attributed by MOE to the advance notice to potential beneficiaries being sufficient indicates that the mobile service providers were able to cope with the load of applications. There were no known outage or crash of the systems.</p> <p>A noted flaw in the process was that applicants were not informed of the outcome of the applications.</p>	<p>informing lessons learned and future programs.</p> <p>Future programs need to include a process of notifying applicants of the outcome of their applications along with reasons for rejection and how to seek further information or appeal.</p>
	<p>Beneficiaries self-enroll in scheme, inclusion in scheme therefore dependent on eligible beneficiaries understanding eligibility criteria and having capacity to act on enrollment.</p>	<p>Information about the program, application criteria and application windows were publicized two weeks in advance of applications opening. (See discussions against ESS10 below). The ability of disadvantaged and vulnerable to equitably receive and act on the information is not known as the information is not currently available.</p>	<p>Use TA component of project to evaluate disadvantaged and vulnerable to access and apply for the program as well as develop systems for monitoring general participation of disadvantaged and vulnerable.</p>
	<p>Risk that disadvantaged or vulnerable people do not have equitable access to information about the cash transfer program, or technological requirements to apply and qualify for the assistance. GoF communication strategy reliant on messaging to those with active mobile phone service in addition to notifications in public media in two weeks lead up to application windows.</p>	<p>There was a concerted Government effort to publicize the program, criteria and means of application two weeks prior to the application windows. Large numbers of unemployed people, including those in the informal sector applied. However, it is not known if disadvantaged and vulnerable were able to equitably access information.</p> <p>The Fijian Government made official public announcements about the rollout of the UA Program through official GoF functions and press and media conferences. More information about the program is made available on the Fijian Government Facebook page, which had a wide audience. Program partners</p>	<p>Use TA component of project to evaluate disadvantaged and vulnerable to access information about the program and based upon that develop protocols for improved communication programs.</p>

		Vodafone and Digicel send out blast SMS messages ⁴ to all potential beneficiaries residing in the target areas, so people are informed adequately in advance on the opening and closing dates of the application period including information on how to apply for the assistance on the platform. (It is noted that those without mobile phones would be less likely to receive information sent through blast messages.) Messages were communicated in all three languages used (English, iTaukei and Hindi).	
ESS2: Labor and Working Conditions	Potential Risk	Assessment	Recommendations
<p>Background: The project workforce is expected to include: (i) direct workers: government staff and a small number of professional consultants engaged directly by the MOE (i.e. project management personnel); and (ii) contracted workers engaged through MOE: FNPF and a TA consultancy firm. No community and primary supply workers are present in the project.</p> <p>The project workforce is primarily comprised of government civil servants who remain subject to the terms and conditions of their existing public sector employment agreement. The remaining project workers are professional consultants working in the PIU and whose contracts include ESS2 provisions under the Fijian legislative framework governing labor and working conditions</p>			
Working conditions and management of worker relationships Terms and conditions of employment Nondiscrimination and equal opportunity Worker's organizations	Working Conditions: The program involves employees of several Government agencies and two mobile phone service companies to administer and implement the program. Risk that project workers are not paid at least minimum wage.	Risk that workers will not be paid minimum wage is low. Review of Fijian civil service salary bands indicates that all civil servants are paid above minimum wage (publicly disclosed). FNPF have confirmed that their workers are paid well beyond the Fijian Employment Relations Regulations. The FNPF salary is tied to the banking and financial sector. The salary is independently reviewed and adjusted every 3 years to stay competitive. All entities and workplaces must abide by the Employment Relations (National Minimum Wage) (Amendment) Regulations 2017. As per this requirement, Vodafone and Digicel pay their workers at least the minimum wage.	No further action required

⁴ An affordable web-based SMS texting service that allows you to easily and simultaneously send text messages to a large number of cell phone users utilizing an automated messaging system.

	The risk of discrimination and lack of equal opportunity	<p>The Fijian Public Services Act 1999 prohibits discrimination against women, youth's disability and ethnicity. While the Act does not explicitly mention prohibition of discrimination on the grounds of political views, this is not considered relevant for the project or at this time in Fiji.</p> <p>The Fijian labor legislative framework is criticized by the ILO for not doing more for women as women are being paid less than men for the same work. From the legislative perspective however under section 78 of the Employment relations Act 2007, equal remuneration for work of equal values is explicitly addressed. Our assessment is that this provision is sufficient for professional consultants and government workers associated with this project where technical expertise will be required to undertake specific tasks.</p>	<p>No further action required</p> <p>No further action required</p>
Protecting the work force Child labor and minimum age Forced labor	The risk of child labor, underage workers and forced labor	These issues are prohibited under the Fijian Employment relations Act 2007, the Act governs all stakeholders in this project by law.	No further action required
Occupational Health and Safety (OHS)	<p>Project workers will be engaging in low risk office work and stakeholder engagement activities.</p> <p>Stakeholder engagement activities may increase the risk of transmission of COVID-19 to both project workers and community members.</p>	Office work and stakeholder engagement activities can be easily managed through existing Fijian legislation.	No further action required
Grievance mechanism (Project Workers)	<p>The risk that project workers cannot access a redress mechanism to file grievances</p> <p>The risk that grievances will</p>	<p>GoF agencies involved in implementation of the program as well as Vodafone and Digicel have worker grievance mechanisms or complaints processes in place for their project workers. The PMU will be utilizing the MOE project GM.</p> <p>The MOE has published a clear, time bound system for</p>	No further action

	<p>not be handled in a time sensitive manner</p> <p>The risk that grievances of a sensitive nature (including sexual assault, harassment and abuse) will not be handled appropriately.</p>	<p>receiving and processing complaints within their human resources policy and guidelines. In both cases, all grievances are expected to be resolved in 14 days.</p> <p>GoF agency GMs are reported to typically have channels to lodge grievances of a sensitive nature to trained professionals with the GoF human resources departments.</p>	
<u>ESS3: Resource Efficiency and Pollution Prevention and Management</u>	Potential Risk	Assessment	Recommendations
N/A. There will be no civil works or purchase of equipment associated with this activity			
<u>ESS4: Community Health and Safety</u>	Potential Risk	Assessment	Recommendations
<p>Community health and safety</p> <p>Infrastructure and equipment design and safety</p> <p>Safety of services</p> <p>Traffic and road safety</p> <p>Ecosystem services</p> <p>Community exposure to health issues</p> <p>Management and safety of hazardous materials</p> <p>Emergency preparedness and response</p>	<p>The risk that gender based-violence might increase as women beneficiaries receive more cash, and men respond with physical or financial abuse.</p>	<p>Not assessed. However, previous due diligence conducted for mother project on this issue based on consultations with Government agencies and review of media did not indicate a heightened associated risk.</p>	<p>No further action.</p>
<u>ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</u>			
N/A. There will be no involuntary land acquisition, physical and economic displacement associated with this component.			
<u>ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</u>			
N/A. There are no risks identified for living natural resources associated with cash transfers			
<u>ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</u>			

The Indigenous Peoples of Fiji, the iTaukei, are the mainstream society in Fiji. The iTaukei represent the majority, or 57 percent of the population according to the 2007 census. As iTaukei customary cultural, economic, social and political institutions are the mainstream culture of Fijian society, ESS7 is not considered relevant. The remaining population in Fiji are comprised of Indo-Fijians (38 percent), whose ancestors migrated to the Fijian Islands in the late 19th and early 20th centuries.

ESS8: Cultural Heritage	Potential Risk	Assessment	Recommendations
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N/A. There are no risks identified for cultural heritage associated with cash transfers.

ESS9: Financial Intermediaries	Potential Risk	Assessment	Recommendations
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FI will not be part of this project.

ESS10: Stakeholder Engagement and Information Disclosure	Potential Risk	Assessment	Recommendations
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<p>Engagement during program preparation and implementation Information disclosure Meaningful consultation</p> <p>Include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. Dedicated approaches and an increased level of resources may be needed for communication with such differently affected groups so that they can obtain the information they need regarding the issues that will potentially affect them.</p>	<p>Risk of lack of access/exclusion for disadvantaged or vulnerable people who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of the project's benefits.</p> <p>Potential vulnerable people include:</p> <ul style="list-style-type: none"> • Elderly • Illiterate people • Vulnerable groups working in informal economy • People with disabilities 	<p>There was a concerted Government effort to publicize the program, criteria and means of application two weeks prior to the application windows. Large numbers of unemployed people, including those in the informal sector applied. However, it is not known if disadvantaged and vulnerable were able to equitably access information.</p> <p>The Fijian Government made official public announcements about the rollout of the UA Program through official GoF functions and press and media conferences. More information about the program is made available on the Fijian Government Facebook page, which had a wide audience. Program partners Vodafone and Digicel send out blast SMS messages⁵ to all potential beneficiaries residing in the target areas, so people are informed adequately in advance on the opening and closing dates of the application period including information on how to apply for the assistance on the platform. (It is noted that those without mobile phones would be less likely to receive information sent</p>	<p>Use TA component of project to evaluate disadvantaged and vulnerable to access information about the program and based upon that develop protocols for improved communication programs.</p>
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⁵ An affordable web-based SMS texting service that allows you to easily and simultaneously send text messages to a large number of cell phone users utilizing an automated messaging system.

	<ul style="list-style-type: none"> Female-headed households 	<p>through blast messages.)</p> <p>Messages were communicated in all three languages used (English, iTaukei and Hindi).</p>	
Grievance mechanism	<p>Risk that a GRM is not established.</p> <p>Risk that the GRM is not accessible, inclusive or responsive.</p>	<p>A GM was established within MOE to receive complaints and requests for review of unsuccessful applications.</p> <p>Complainants could lodge complaints/appeals by email or by calling one of seven hotline numbers. The contact details were publicized on the Government's Facebook page and various media platforms. During the peak period, the mobile phones were operational overnight. While the complaints system was set up and operational, the fact that unsuccessful applicants were not informed of their rejection along with the reasons and means of appealing, significantly limits the accessibility of the grievance mechanism.</p> <p>Complaints were typically addressed within two days.</p> <p>Information on the number of complaints received, whether by men/women or by sector has not been collated.</p>	<p>Use the TA to develop clear and transparent process on communicating outcomes of applications and how to appeal decisions.</p>
Other	Potential Risk	Assessment	Recommendations
Personal Data Privacy	<p>Risk that personal data collected does not adhere to appropriate personal data privacy standards.</p>	<p>Risk that personal data collected does not adhere to appropriate personal data privacy standards is considered low.</p> <p>Right to confidentiality of personal information is guaranteed under the Fiji Constitution.</p> <p>Agreements between MOE and mobile phone service provider companies (SPs) receiving applications require the SPs to:</p>	<p>No further action</p>

		<ul style="list-style-type: none">- protect against loss, unauthorized access, use, modifications or disclosure of personal information- ensure its employees who have access to personal information are made aware of, and undertake in writing, to observe the obligations with respect of protection of personal information. <p>Specified requirements to the SPs regarding storage or disposal of personal information is not known.</p> <p>Applications include confirmation of consent for the Fijian Government to access the applicant's vaccination details.</p> <p>MOE only transfers the items of personal data from the application to partner Government agencies that is required for verification purposes.</p>	
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III. SUMMARY OF RECOMMENDATIONS

Due diligence was undertaken on the existing unemployment assistance cash transfer program. Significant benefits were provided to the vulnerable and unemployed through the program. However, there are aspects that require further assessment as well as systems improvements, especially with respect to monitoring and evaluation, ensuring equitable participation and information communication for disadvantaged and vulnerable.

The following actions are recommended to be supported by the Project through its technical assistance (TA):

- Further assess the effectiveness of application and assistance disbursement mechanism through participatory methods in-country, which could not be undertaken as part of the social audit.
- Influence GoF policy on improved inclusive approaches as well as monitoring general participation of disadvantaged and vulnerable and explore supplementary alternative means for lodging applications in future similar programs that do not rely on mobile phone and SIM card ownership.
- Evaluate disadvantaged and vulnerable stakeholders' access and ability to apply for the program as well as develop systems for monitoring general participation of disadvantaged and vulnerable.
- Evaluate disadvantaged and vulnerable access information about the program and based upon that develop protocols for improved communication programs.
- Develop clear and transparent processes for future similar programs on communicating outcomes of applications and how to appeal decisions.

ANNEX 2 ENVIRONMENTAL AND SOCIAL RISK SCREENING FORM

This form will be filled out by the international E&S specialist/national E&S officer, and submitted to the Bank for approval.

Subproject: _____

Subproject implementation unit: _____

Criteria	Relevance		Level of E&S Risk				Remarks/Actions
	Yes	No	L	M	S	H	
Subproject's Environmental and Social Risks							
<p>Exclusion List</p> <ul style="list-style-type: none"> • Any subproject activity that would be classified as “High Risk” or “Substantial Risk” as per the classification system described in Annex 3 E&S Risk Classification Guidance; • Significant conversion or degradation of critical natural habitats or critical cultural heritage sites; • Plantation and rehabilitation activities that have a risk of introducing invasive species, pests or diseases into areas of natural habitat; • Air, water, or soil contamination leading to significant adverse impacts on the health or safety of individuals, communities, or ecosystems; • Workplace conditions that expose workers to significant risks to health and personal safety; • Involuntary land acquisition; • Involuntary restrictions to land, and/or involuntary physical or economic displacement of people or assets belonging to titled or non-titled people on a temporary or permanent basis; • Large-scale changes in land use or access to land and/or natural resources; • Adverse E&S impacts covering large geographical areas, including transboundary impacts, or global impacts such as greenhouse gas (GHG) emissions; • Significant cumulative, induced, or indirect impacts; • Activities that involve the use of forced or child labor; • Marginalization of, discrimination against, or conflict within or among, social (including ethnic and racial) groups; or • Activities that would have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation. 							<p>If any subproject activity falls into this exclusion list, it should be excluded immediately and no need to further fill in rest sections of this screening form.</p>

Criteria	Relevance		Level of E&S Risk				Remarks/Actions
	Yes	No	L	M	S	H	
1. Is the subproject located in nature reserves (existing or planned), scenic areas, forest parks, protected water sources, or areas with high ecological value?							If Yes, then the subproject will be considered as High or Substantial risk, and be excluded.
2. Is the subproject area located in critical natural habitat? i.e. is there important, fragile or endangered wildlife species in the subproject area?							If yes, the subproject will be considered as High or Substantial risk, and will not be supported.
3. Will the subproject have a risk of introducing invasive species, pests or diseases to the project area?							If yes, then the subproject will be excluded.
4. Will the subproject implementation lead to degradation or conversion of on non-critical natural habitat?							If yes, the subproject will be considered as High or Substantial risk, and will not be supported.
5. Does the subproject require new land acquisition or resettlement?							If Yes, then the subproject will be considered as High or Substantial risk, and be excluded.
6. Will the subproject involve the involuntary displacement of people or assets, including structures, plants, food gardens or shelters?							If Yes, then the subproject will be considered as High or Substantial risk, and be excluded.
7. Is there known archeological, historical, or cultural heritage site in the area of influence of the subproject and there are potential adverse impacts on these sites?							If Yes, then the subproject will be considered as High or Substantial risk, and be excluded.
8. Has the local population or any NGOs expressed concern about or opposition to the subproject?							If yes, the SEP will include appropriate arrangements for meaningful engagement with NGOs and relevant stakeholders. The project designs will consider the suggestions as necessary.
9. Will the subproject bring significant community health and safety risks?							If yes, then the subproject will be considered as High or Substantial risk, and be excluded.
10. Will the subproject cause significant labor safety and health risks?							If yes, then the subproject will be considered as High or Substantial risk, and be excluded.

Criteria	Relevance		Level of E&S Risk				Remarks/Actions
	Yes	No	L	M	S	H	
11. Will the subproject involve forced labor or child labor?							If yes, the subproject will not be supported.
12. Will the subproject community include people whose first language is not English?							If yes, the SEP will include measures to ensure that iTaukei and/or Hindi are included in the means of communication.
Reputational Risks							
13. Does the village cooperatives have serious E&S legacy issues that may pose reputational risks to the project?							If yes, the subproject will not be supported.
14. Is there “associated facilities” involved in the subproject? (“Associated Facilities” means facilities or activities that are not funded as part of the project and, in the judgment of the Bank, are: (a) directly and significantly related to the project; and (b) carried out, or planned to be carried out, contemporaneously with the project; and (c) necessary for the project to be viable and would not have been constructed, expanded or conducted if the project did not exist.)							If Yes, then the E&S risks of the “associated facilities” shall be screened as well. If the E&S risks of such “associated facilities” are High or Substantial, then the proposed subprojects shall be excluded.
Overall environmental and social risk: (Overall risk shall be determined based on the highest rating of all above questions)							If the overall risk level is High or Substantial, then the subproject should be excluded. For Low and Moderate risk subprojects, the ESCOP (and LEP?) applies.

ANNEX 3 E&S RISK CLASSIFICATION GUIDANCE

Following the ESF requirements, the subprojects will be classified as one of the following risk ratings: High Risk, Substantial Risk, Moderate Risk or Low Risk.

This classification approach takes into account relevant potential risks and impacts, including:

- a) The type, location, sensitivity and scale of the subproject, including the physical considerations, type of infrastructure; volume of hazardous waste management and disposal;
- b) the nature and magnitude of the potential E&S risks and impacts, including impacts on green field sites; impacts on brown field sites (e.g., rehabilitation, maintenance or upgrading activities); the nature of the potential risks and impacts (e.g., whether they are irreversible, unprecedented or complex); resettlement activities; presence of ethnic minorities; and possible mitigation measures;
- c) the capacity and commitment of the subproject owner to manage such risks and impacts in a manner consistent with the national regulations and Bank ESSs, including the country's policy, legal and institutional framework; laws, regulations, rules and procedures applicable to the subproject sector; including regional and local requirements; the technical and institutional capacity of the subproject owner; the subproject owner's track record of past subproject implementation; and the financial and human resources available for management of the subproject;
- d) other areas of risk that may be relevant to the delivery of E&S mitigation measures and outcomes, depending on the specific subproject and the context in which it is being developed, including the nature of the mitigation and technology being proposed, considerations relating to domestic and /or regional stability, conflict or security.

High Risk

A subproject is classified as High Risk after considering, in an integrated manner, the risks and impacts of the subproject, taking into account the following, as applicable:

- a) The subproject is likely to generate a wide range of significant adverse risks and impacts on humans or the environment. This could be because of the complex nature of the subproject, the scale (large to very large) or the sensitivity of the location(s) of the subproject. This would take into account whether the potential risks and impacts associated with the subproject have the majority or all of the following characteristics, e.g. (i) long term, permanent and/or irreversible (e.g., loss of major natural habitat or conversion of wetland), and impossible to avoid entirely due to the nature of the subproject; (ii) high in magnitude and/or in spatial extent (the geographical area or size of the population likely to be affected is large to very large); (iii) significant adverse cumulative impacts; (iv) significant adverse trans-boundary impacts; and (v) a high probability of serious adverse effects to human health and/or the environment (e.g., due to accidents, toxic waste disposal, etc.).
- b) The area likely to be affected is of high value and sensitivity, for example sensitive and valuable ecosystems and habitats (legally protected and internationally recognized areas of high biodiversity value), lands or rights of ethnic minorities, intensive or complex involuntary resettlement or LA, impacts on cultural heritage or densely populated urban areas.
- c) Some of the significant adverse E&S risks and impacts of the subproject cannot be mitigated or specific mitigation measures require complex and/or unproven mitigation,

compensatory measures or technology, or sophisticated social analysis and implementation.

- d) There are significant concerns that the adverse social impacts of the subproject, and the associated mitigation measures, may give rise to significant social conflict or harm or significant risks to human security.
- e) There is a history of unrest in the area of the subproject or the sector, and there may be significant concerns regarding the activities of security forces.
- f) The subproject is being developed in a legal or regulatory environment where there is significant uncertainty or conflict as to jurisdiction of competing agencies, or where the legislation or regulations do not adequately address the risks and impacts of complex subprojects, or changes to applicable legislation are being made, or enforcement is weak.
- g) The past experience of the subproject owner and the implementing agencies in developing complex subprojects is limited, their track record regarding E&S issues would present significant challenges or concerns given the nature of the subproject's potential risks and impacts.
- h) There are significant concerns related to the capacity and commitment for, and track record of relevant subproject parties, in relation to stakeholder engagement.
- i) There are a number of factors outside the control of the subproject that could have a significant impact on the E&S performance and outcomes of the subproject.

Substantial Risk

A Project is classified as Substantial Risk after considering, in an integrated manner, the risks and impacts of the Project, taking into account the following, as applicable:

- a) The subproject may not be as complex as High Risk subprojects, its E&S scale and impact may be smaller (large to medium) and the location may not be in such a highly sensitive area, and some risks and impacts may be significant. This would take into account whether the potential risks and impacts have the majority or all of the following characteristics: (i) they are mostly temporary, predictable and/or reversible, and the nature of the subproject does not preclude the possibility of avoiding or reversing them (although substantial investment and time may be required); (ii) there are concerns that the adverse social impacts of the subproject, and the associated mitigation measures, may give rise to a limited degree of social conflict, harm or risks to human security; (iii) they are medium in magnitude and/or in spatial extent (the geographical area and size of the population likely to be affected are medium to large); (iv) the potential for cumulative and/or trans-boundary impacts may exist, but they are less severe and more readily avoided or mitigated than for High Risk subprojects; and (v) there is medium to low probability of serious adverse effects to human health and/or the environment (e.g., due to accidents, toxic waste disposal, etc.), and there are known and reliable mechanisms available to prevent or minimize such incidents.
- b) The effects of the subproject on areas of high value or sensitivity are expected to be lower than High Risk subprojects.
- c) Mitigating and/or compensatory measures may be designed more readily and be more reliable than those of High Risk subprojects.
- d) The subproject is being developed in a legal or regulatory environment where there is uncertainty or conflict as to jurisdiction of competing agencies, or where the legislation or regulations do not adequately address the risks and impacts of complex

Projects, or changes to applicable legislation are being made, or enforcement is weak.

- e) The past experience of the subproject owner and the implementing agencies in developing complex subprojects is limited in some respects, and their track record regarding E&S issues suggests some concerns which can be readily addressed through implementation support.
- f) There are some concerns over capacity and experience in managing stakeholder engagement, but these could be readily addressed through implementation support.

Moderate Risk

A subproject is classified as Moderate Risk after considering, in an integrated manner, the risks and impacts of the Project, taking into account the following, as applicable:

- a) The potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. This is because the subproject is not complex and/or large, does not involve activities that have a high potential for harming people or the environment, and is located away from environmentally or socially sensitive areas. As such, the potential risks and impacts and issues are likely to have the following characteristics: (i) predictable and expected to be temporary and/or reversible; (ii) low in magnitude; (iii) site-specific, without likelihood of impacts beyond the actual footprint of the subproject; and (iv) low probability of serious adverse effects to human health and/or the environment (e.g., do not involve use or disposal of toxic materials, routine safety precautions are expected to be sufficient to prevent accidents, etc.).
- b) The subproject's risks and impacts can be easily mitigated in a predictable manner.

Low Risk

A subproject is classified as Low Risk if its potential adverse risks to and impacts on humans and/or the environment are likely to be minimal or negligible. These subprojects, with few or no adverse risks and impacts and issues, do not require further E&S assessment following the initial screening.

ANNEX 4 LABOR MANAGEMENT PROCEDURES

Fiji Social Protection COVID-19 Response and System Development Project (P175206) & Additional Financing (P177674)

LABOR MANAGEMENT PROCEDURES

Updated Draft – December 2021

1. PROJECT INTRODUCTION

This Labor Management Procedure (LMP) was designed for the Fiji Social Protection COVID-19 Response and System Development Project P175206 (parent project) in December of 2020. This updated LMP is prepared to include activities that have been introduced as part of the Additional Financing P177674, namely, components 3 and 4. The parent project for the Additional Financing (AF) was approved on February 9, 2021 in the amount of SDR 34.8 million (US\$50 million equivalent). In August 2021, Government of Fiji requested the Bank to provide additional financing to the parent project in the amount of US\$45 million equivalent (IDA Credit) to continue supporting the unemployed and vulnerable affected by the COVID-19 crisis. This amount has now increased to US\$50 million as per World Bank approval. This LMP combines the parent project and AF and thereby covers both projects and streamlines LMP activities within one document.

This LMP will need to be updated by MOE to reflect detailed designs and plans to be prepared and finalized for Component 4; Jobs for Nature 2.0 (JFN2) scheme. At the time of updating this LMP, the operations manual for component 4 had not been initiated and hence, it was not possible to capture the details in this LMP, including exact number of workers, project worker redress mechanism details and so forth. The projects environmental and social commitment plan require the project to complete missing details and update this LMP before finalizing the operations manual for component 4 and initiating activity.

The Fiji Social Protection COVID-19 Response and System Development Project supports cash transfers to the unemployed and underemployed affected by COVID-19 and strengthen the social protection system and the relevant policy setting in Fiji. The project consists of two components. Component 1: Cash transfers to the unemployed and underemployed affected by COVID-19 supports cash transfers in the form of government top-ups to the Fiji National Provident Fund (FNPF) members who have lost their jobs or face reduced hours or reduced wages as a result of the COVID-19 crisis and who have insufficient balance in their FNPF General Account. Component 2: Institutional strengthening focuses on strengthening the Fijian social protection delivery system and the relevant policy setting. Activities under Component 2 aim to help the government build an integrated system for identifying and providing necessary support to vulnerable populations not covered by social assistance benefits, but who need support in the event of economic or natural covariate shocks. The Project will also support monitoring and evaluation and project management. The AF has introduced two new components: Component 3: Unemployment assistance (US\$40 million): this component will support cash payments to the unemployed who lost jobs or livelihood in formal and informal sectors because of the COVID-19 pandemic. For which a share of 80 percent of the total IDA financing will be paid retroactively and; Component 4: Supporting employment opportunities for green, resilient, and inclusive growth (US\$9 million); this component will support job opportunities through public works for vulnerable Fijians residing in rural areas. The remaining amount (US\$1 million) is to support institutional strengthening.

2. PROJECT MANAGEMENT

The project will be monitored by a Steering Committee (SC) with the participation of multiple institutions; the Ministry of Economy as the leading implementation agency; joined by other implementation partners, including the Fiji National Provident Fund (FNPF), Ministry of Women, Children and Poverty Alleviation (MWCPA), Ministry of Employment, Productivity and Industrial Relations (MEPIR), Ministry of Commerce, Trade, Tourism and Transport (MCTTT).

The Ministry of Economy (MOE) is the leading implementation agency and has overall responsibility for the project implementation and coordination. MOE has set up a Project Management Unit (PMU), which is responsible for the day-to-day work on project management, coordination, financial management, procurement, monitoring and reporting, and environmental and social (E&S) risk management.

The PMU is comprised of a project manager, specialist and technical coordinators who have been assigned from other government ministries. The MOE has recruited an environmental and social specialist and an environmental and social officer to the PMU who will be maintained throughout project implementation. The Project has also committed, within the environmental and social commitment plan (ESCP), to assign at least one additional environmental and social officer from Ministry of Environment to the PMU, to support the environmental and social management of JFN2 subproject activities.

3. OVERVIEW OF LABOR USE ON THE PROJECT

3.1. Categorization of the Workforce

The project workforce includes two categories of worker: i) Direct Workers: including government staff assigned to the project and consultants engaged directly by the MOE as part of the PMU; and ii) Contracted Workers: staff engaged through the FNPF as part of Component 1; a Technical Advisory consultancy firm as part of Component 2; staff employed under Component 3 Unemployment Assistance; and Component 4; Village Cooperatives and employees whom are also classified as contracted workers to deliver upon JFN2. **NOTE: as the Component 4 Operations Manual is yet to be developed under the Project; this LMP will need to be updated to reflect whether Village cooperatives will engage individual workers as subcontractors or if the workers would be direct contractors. The requirement for an LMP update is included within the AF ESCP.**

No migrant workers are anticipated in this project.

The total number of project workers is cannot be estimated due to component 4. A breakdown of anticipated workers is provided:

- Component 1: 11 Direct Workers (eight assigned government staff and three consultants recruited under the PMU) and approximately 180 Contracted Workers, all existing staff of the FNPF. Note that FNPF will not engage additional workers and the existing permanent employees will be part of the Project.
- Component 2: The number of individuals to be recruited under the TA consultancy is anticipated to have approximately 10 individuals however the exact number is unknown as the TA consultancy TOR is yet to be compiled. Approximately five direct workers will be engaged under the PMU.
- Component 3: Approximately 60 contracted workers were engaged and continue to work on the implementation of the unemployment assistance provided through the MOE in conjunction with Digicel and Vodafone.
- Component 4: as a jobs program, this component is expected to engage hundreds of Village Cooperatives across the country; comprising thousands of workers. Estimated 10,000 workers in total.

3.2. Project Labor Requirements

Project Component	Estimated No. of Project Workers	Characteristics of Project Workers	Timing of Labor Requirements
Component 1: Provide cash transfers to those made unemployed or	180 contracted workers in FNPF.	Chief Operating Officer (Project Manager)	Operations

<p>underemployed COVID-19</p>	<p>by All locally employed and above the age of 18. 102 are females and 78 males.</p>	<p>COVID-19 Committee Members: Deliberate and makes decisions in consultation with Ministry of Economy, Legal and Corporate Governance on FPNP member appeals and clarity on withdrawal guidelines and policy.</p> <p>GRM Committee Members: Ensure that Member’s concerns are dealt with fairly and independently; operate in line with the Review of Decision Policy; review the submission and make recommendation for the Funds Chief Executive Officer’s consideration.</p> <p>Member Services Department: Staff process and approve FPNP member applications.</p> <p>Human Resources Department: Assist COVID - 19 Committee in resource allocation.</p> <p>Public Relations Department: Member awareness through social media, TV, Radio and newspapers.</p> <p>Corporate Governance: Provide policy guidance and risk assessment of the COVID-19 payment assistance.</p> <p>Information Technology: Provides all IT Infrastructure and support.</p> <p>Finance Department: COVID-19 payment processing, reconciliation and acquittal reporting. Also responsible for document and record-keeping.</p> <p>Legal Department: Provides legal advice.</p> <p>Treasury Department: Monitors cash flow position.</p> <p>Internal Audit Department: Real time and audit assurance of COVID-19 assistance.</p>	
<p>Component 2 (2.1-2.2): Institutional strengthening</p>	<p>10 contracted workers: TA Consultancy</p>	<p>TA Project Manager</p> <p>Social Protection Specialist</p> <p>Study Tour Coordinator and Trainer</p>	<p>Operations</p>

		<p>Policy Advisor</p> <p>Environmental and Social Officer</p> <p>Gender Based Violence Specialist</p> <p>Procurement Specialist</p> <p>Monitoring and Evaluation Specialist</p>	
<p>Subcomponent 2.3: Project Management Unit (PMU) strengthening the capacity of MOE and the</p>	<p>11 Direct Workers: 7 PMU staff: 4 gov staff, 3 new staff 4 Technical Coordinators</p>	<p>PMU staff: Project Manager, Financial management Specialist, Procurement Specialist, Social Protection Specialist, a Project Officer, Environmental and Social Specialist, Environmental and Social Officer*</p> <p>*New positions will be made in the PMU for the Social Protection Specialist, a Project Officer and an Environmental and Social Specialist. All other PMU positions will be filled with existing Ministry staff.</p> <p>Technical Coordinators: four staff will be assigned to the project; one representative from FNPF, MWCPA, MEPIR, and MCTTT</p>	Operations
<p>Component 3: Unemployment Assistance</p>	<p>Direct workers: MOE: TBC FNPF: TBC [other GoF] Digicel: 30 Vodafone: 30</p> <p>All locally employed and above the age of 18.</p>		Operations
<p>Component 4: Supporting employment opportunities for and green, resilient inclusive growth</p>	<p>Direct Workers: TBC PMU Staff:TBC Min of Water & Environment: TBC Dept of Environment:</p>	<p>PMU staff: Project Manager, Financial management Specialist, Procurement Specialist, Social Protection Specialist, a Project Officer, Environmental and Social Specialist, Environmental and Social Officer*</p> <p>*New positions will be made in the</p>	Operations

	TBC	PMU for the Social Protection Specialist, a Project Officer and an Environmental and Social Specialist. All other PMU positions will be filled with existing Ministry staff. Technical Coordinators: four staff will be assigned to the project; one representative from DOE and Climate Change Division.	
	Contracted Workers: estimated 10,000 positions	Village cooperative and registered group workers employed under the JFN2 Program funded by the project. Workers are recruited by village cooperatives that have successfully applied for grants under the program. The number of positions means individual 3-month or 6-month jobs that may be held consecutively by the same person (although recommended to not allow exceeding one year for one beneficiary, to ensure enhanced benefit sharing).	Operations

4. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The Project management will demonstrate high standards of human resource management and adhere to Fiji’s national labor and OHS legislation and international instruments including International Labor Office conventions ratified by Fiji. The most significant risks to worker health, safety and well-being are summarized in **Table** below.

Project activity	Key Labor Risks
General project administration and implementation (hiring of consultants, monitoring and reporting, financial management, audits, E&S management, project coordination, study tours, workshop and consultative activities, the procurement of office equipment, hardware and software, as well as project management and monitoring and	<ul style="list-style-type: none"> •Risk of traffic accidents in travel to project office. •Exposure to public or other workers with contracted COVID-19, putting workers at risk of psychological distress and health problems. •Sexual Exploitation, Harassment and Abuse (SEHA) and Gender Based Violence in the workplace. •occupational health and safety from working at the desk and in an office environment

evaluation)	
<p>Running cash transfers program to those made unemployed or underemployed by COVID-19. Providing public with information and support to access unemployment benefits.</p>	<ul style="list-style-type: none"> •Members of the public pressure staff to disburse unemployment benefits causing staff distress and fatigue. •Mental stress due to workloads given need of public to access unemployment benefits. •Sexual Exploitation, Harassment and Abuse (SEHA) and Gender Based Violence in the workplace. •Use of child labor contravenes national legislation and international conventions ratified by Fiji. •Project workers pressured by family members and/or others to engage in fraud •occupational health and safety from working at the desk and in an office environment
<p>Village cooperative workers employed under the JFN2 Program. Workers will be employed from the community for a limited period of time (3-6 months) to provide additional work opportunities. Workers will be newly recruited from the communities for the program.</p>	<ul style="list-style-type: none"> •Working conditions are below national minimum regulated standards. •Exploitation of workers through underpayment by village cooperative (fraud and/or forced labor). •Use of child labour in contravention of national legislation and international conventions ratified by Fiji. •Sexual Exploitation, Harassment and Abuse (SEHA) and Gender Based Violence in the recruitment process or workplace. •Occupational health and safety from working in unfamiliar manual tasks or with improper tools or with tools for which they are inadequately trained. •Lack of access to effective grievance mechanism.

5. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

Fiji's labor legislation is comprehensive and covers most issues included in ESS2. The *Constitution of the Republic of Fiji*, adopted in 2013, incorporates a Bill of Rights which contains some articles on labor and working conditions. Specifically, it guarantees protection for the following rights:

- To freedom from slavery, servitude, forced labor and human trafficking (Article 10).
- To freedom of assembly and association (Articles 18 and 19).
- To fair employment practices and the right to form or join a trade union and to engage in collective bargaining (Article 20).
- To equality and freedom from discrimination on the grounds of race, culture, ethnic or social origin, colour, place of origin, sex, gender, sexual orientation, gender identity and expression, birth, primary language, economic or social or health status, disability, age, religion, conscience, marital status or pregnancy (Article 26).
- To full and free economic participation (Article 32).

- To work and a just minimum wage (Article 33).

Attachment A sets out Fiji's key employment and occupational health and safety legislation and ratification of international conventions.

The **Employment Relations Act 2007 (ERA)** is Fiji's main legislation covering labor and working conditions.⁶ It sets out fundamental principles and rights at work including: the prohibition on forced labor and on the worst forms of child labor, the right to non-discrimination, freedom from harassment and equal opportunity in employment, equal pay for equal work, and freedom of association. It also establishes the Employment Relations Advisory Board (ERAB), an expert group comprising representatives of the Government, employers and workers, which advises the Minister on a range of matters related to employment policy and law.⁴⁸ The ERA regulates terms and conditions of employment including:

- The establishment and termination of employment.
- The payment of wages.
- Hours of work.
- Leave.
- Minimum age for employment and restrictions on the employment of children.
- Grievance procedures and dispute resolution mechanisms.
- Procedures governing industrial action.

In addition to the ERA, subsidiary legislation – including the Employment Relations (Administration) Regulations 2008, Hazardous Occupations Prohibited to Children under 18 Years of Age Order 2013, and Employment Relations (National Minimum Wage) Regulations 2015 – set out further details on these provisions.

The **Human Rights Commission Act 1999 (HRCA)** prohibits unfair discrimination and harassment in employment, including in recruitment and training. The HRCA provides that any person may make a complaint to the Human Rights Commission about unfair discrimination, harassment or another contravention of their human rights under the Act. The HRCA outlines the Commission's powers to investigate and conciliate a complaint. It also sets out judicial remedies for unfair discrimination or a contravention of Fiji's Bill of Rights. In addition to the HRCA, the **Rights of Persons with Disabilities Act 2018** sets out the rights to equal opportunity and non-discrimination in work and employment for people with a disability and includes provisions for ensuring safe work access for workers with disabilities among other rights.

6. BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

The Health and Safety at Work Act (HASAW), 1996 and amended in 2003, is the key legal instrument for safety and health at work. It is comprehensive, covering a wide range of key aspects of safe and healthy environment at work. The HASAW Act provides the following:

- The general inspection of safety and health at work.

⁶ The *Health and Safety at Work Act 1996* also operates in Fiji. However, it is not covered here as occupational health and safety is beyond the scope of this report.

- Duties of the persons assigned for the control of workplace.
- Duties of employers and workers to non-working people visiting the workplace.
- Duties of manufacturers, importers, suppliers, and installers.
- General obligations concerning non-interference of safety and health at work.
- Appointment and tasks, duties, rights and functions of the workers' Safety and Health Representative.
- Appointment and membership of the Safety and Health Committee.
- Provisions for prevention of discrimination of the Health and Safety Representative or an individual worker informing the OSH Inspector.
- Investigation of workers ceasing work under immediate threat to safety.

Notification and registration of workplaces with twenty workers or more is stipulated, as well as the registration, notification and statistics of occupational accidents and diseases.

The HASAW Act mandates the Safety Inspection, Chief Inspectors, and the Inspectorate for enforcement of OHS regulations. The law stipulates the rights and powers of the Inspectorate; controls for notifications by employers; penalties; and appeal systems. The Act is supplemented by associated regulations on OHS administration, training, representatives and committees, general workplace conditions, and a number of specific substantive provisions such as diving, hazardous substances, and a Code of Practice on noise. In addition, the Code of Practice on HIV/AIDS in the Workplace (2008) and the National Policy on Sexual Harassment in the Workplace (2008) are important elements of the OHS regulatory environment.

The Act stipulates the establishment and operation of the National Occupational Health and Safety Advisory Board (NOHSAB) under the Ministry of Employment, Productivity and Industrial Relations. The role of the Board is advisory, providing support to the development of Ministry of Employment policies, follow-up of the development of OHS standards and responding to specific questions and requests set by the Minister. The Board is a tripartite and multi-sectoral body, chaired by the Permanent Secretary of the Ministry of Employment, Productivity and Industrial Relations, with Deputy Chairs from representative employers' and workers' organizations and members from the Ministries of Health, Mining, Agriculture, Transport and Civil Aviation, and the Environment. The Board may also include representatives from other relevant Ministries.

7. RESPONSIBLE STAFF

7.1. Project Management (MOE)

The MOE will be responsible for project management, implementation and coordination with other government ministries and stakeholders as outlined above in Section 2 Project Management. The Project Manager will lead day-to-day project management and implementation, supported by an Environment and Social Specialist and an Environmental and Social Officer. Responsibilities include:

- Implementing this LMP;
- Ensuring that contractors comply with this LMP;

- Monitoring to verify that contractors are meeting labor and OHS obligations toward contracted workers as required by Fiji’s legislation and ESS2;
- Monitoring contractors’ implementation of this LMP;
- Monitoring compliance with occupational health and safety standards at all workplaces in line with the national occupational health and safety legislation;
- Monitoring compliance with COVID-19 related health and safety measures including making workplaces ready for COVID-19;
- Ensuring that the grievance mechanism for Project workers is established and implemented and that workers are informed of its purpose and operation.
- Have a system for regular monitoring and reporting on labor and occupational safety and health performance; and data collection, monitoring, and analysis of the LMP as part of the Project’s M&E activity. Report on LMP implementation within the six-monthly report to the WB.
- Promptly notify the WB of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the WB’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence. Minor incidents will be reflected in the six-monthly reports to the WB, major incidents will be reported to the WB within 24 hours.

7.2. Contractors

Contractors are responsible for management of their workers or subcontracted workers in accordance with this LMP, which will be supervised by the MOE and Project Manager. Contractors will be responsible for the following:

- To obey requirements of the national legislation (including any emergency regulations) and this LMP;
- Maintain records of recruitment and employment process of contracted workers;
- Communicate clearly job description and employment conditions to contracted workers;
- Provide workers with evidence of all payments made, including benefits and any valid deductions;
- Provide all contracted workers with health insurance that covers treatment for COVID-19 infections;

- Maintain records regarding labor conditions and workers engaged under the Project, including contracts, registry of induction of workers including Code of Conduct, hours worked, remuneration and deductions (including overtime);
- Assign a designated safety officer, conducting training on and implementing OHS measures and measures to mitigate the spread of COVID-19, recording safety incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities;
- Ensure no child or forced labor is involved in the Project.
- Maintain records of training/induction dates, number of trainees, and topics.
- Implement the grievance mechanism for workers, maintaining records of any worker grievances including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up outstanding.
- Establish a system for regular review and reporting on labor, and occupational safety and health performance.

This LMP can be updated to include additional details about the hired workforce of contractors including, as necessary.

8. POLICIES AND PROCEDURES

8.1. Age of Employment

Fiji has ratified both the ILO Minimum of Age Convention (C138) and the ILO Worst Forms of Child Labor Convention (C182). A study by the ILO based on five child labor surveys has reported that children in Fiji are engaged in child labor. Fiji recorded 173 cases of child labor from 2011 to 2014, including in street work, and in the worst forms of child labor such as commercial sexual exploitation. Children were also found to be involved in hazardous work such as collecting and handling scrap metals, chemicals, and carrying heavy loads. Poverty, parental or family neglect and other social problems, combined with the need for cash for personal requirements, remain the key factors that push children into child labor. The Employment Relations Act defines the minimum age and conditions of employment for children who are above 15 years. The Ministry of Employment, Productivity, and Industrial Relations has increased the number of labor inspections conducted throughout the year and was actively involved in the launch and implementation of the Tackling Child Labor Through Education Project.

The minimum age of employment for this Project will be 18 years so that full time employment is possible. To ensure compliance, all employees will be required to produce a Tax Identification Number (TIN) as proof of their identity and age. Contractors and subcontractors will be required to receive approval for the specific procedures they will use to verify the ages of job applicants.

8.2. Terms and Conditions of Employment

Terms and conditions of direct workers are determined by their individual contracts. Permanent Project staff will have individual agreements (labor contract or service contract) with fixed fortnightly wage rates. All the recruiting procedures will be documented and filed in accordance to

the requirements of Fiji's labor legislation and the ESS2. Forty (40) hour per week employment should be practiced. Requirements and conditions of overtime and leave entitlements are agreed as part of individual contracts.

The Project Manager will ensure that contractors are aware of, and comply with, labor management and OHS policies and procedures outlined in this LMP. Each contractor will be required to submit an assessment of environmental and social risks (including labor risks) associated with their activities and risk mitigation measures in accordance with the Project's environmental and social requirements.

8.3. Occupational Health and Safety

The OHS measures of the Project are based on the requirements of the relevant sections of ESS2 as well as the Fijian government OHS regulations and guidelines and WHO guidelines. These will particularly address the key identified risk, including for fatigue and mental stress due to the workload, office-based injuries and the potential infection of project workers with Covid-19 in the event of an outbreak.

The Environment and Social Specialist and Environmental and Social Officer, on behalf of the MOE, will review the MOE, FNPF, MOWE and DOE existing OHS guidelines for all project workers, monitor and implement training on OHS for Project workers and establish a system for regular monitoring and reporting on OHS performance including documentation and reporting of occupational accidents, diseases and incidents. The Project Manager will ensure effective methods are put in place for responding to identified hazards and risks, establishing priorities for taking action and evaluating outcomes. The Project Environment and Social Specialist and Environmental and Social Officer will ensure that the OHS guidelines comply with the following provisions:

- Ensure workplace health and safety standards in full compliance with Fiji law, ESS2 and WHO Guidelines and include:
 - Basic safety awareness training to be provided to all persons as well as on COVID-19 prevention and related measures.
 - All Project vehicle drivers to have appropriate licenses.
 - First aid equipment and facilities to be provided in accordance with labor legislation.
 - Adequate provision of hygiene facilities (toilets, hand-washing basins) and resting areas etc.
- Compliance with Fiji legislation, WB's ESS2 requirements and other applicable requirements which relate to OHS hazards, including WHO specific COVID-19 guidelines.
- All workplace health and safety incidents to be properly recorded in a register detailing the type of incident, injury, people affected, time/place and actions taken.
- All workers (irrespective of contracts being full-time, part-time, temporary or casual) to be covered by insurance against occupational hazards and COVID-19, including ability to access medical care and take paid leave if they need to self-isolate as a result of contracting COVID-19.
- All work sites to identify potential hazards and actions to be taken in case of emergency.

- Any on-site accommodation to be safe and hygienic, including provision of an adequate supply of potable water, washing facilities, sanitation, accommodation and cooking facilities.
- Workers residing at site accommodation to receive training in preventing prevention of infection through contaminated food and / or water, COVID-19 prevention and avoidance of sexually transmitted diseases.
- Laminated signs of relevant safe working procedures to be placed in a visible area on work sites, in local language and English, including on hand hygiene and cough etiquette, as well as on symptoms of COVID-19 and steps to take if suspect have contracted the virus.
- Fair and non-discriminatory employment practices.
- Safe access to project facilities (workplace) for workers with disabilities
- Under no circumstances will contractors, suppliers or sub-contractors engage forced labor.
- Construction materials to be procured only from suppliers able to certify that no forced labor or child labor (except as permitted by the Labor Law) has been used in production of the materials.
- All employees to be aware of their rights under the Labor Law, including the right to organize.
- All employees to be informed of their rights to submit a grievance through the Project Worker Grievance Mechanism. All employees to be provided training on appropriate behaviour with communities, gender-based violence and violence against children.

Project workers will receive OHS training at the start of their employment or engagement, and thereafter on a regular basis and when changes are made in the workplace, with records of the training kept on file. Training will cover the relevant aspects of OHS associated with daily work, including the ability to stop work without retaliation in situations of imminent danger (as set out in paragraph 27 of ESS2) and emergency arrangements; training on COVID-19 prevention, social distancing measures, hand hygiene, cough etiquette and relations with local community. Training will also focus on the Project's labor-management procedures, stakeholder engagement and grievance mechanism.

All parties who employ or engage Project workers will actively collaborate and consult with Project workers in promoting understanding of, and methods for, implementation of OHS requirements, as well as in providing information to Project workers, training on occupational safety and health, and provision of personal protective equipment without expense to the Project workers.

For grant recipient village cooperatives and workers contracted by grant recipient village cooperatives under the JFN2 Program, MOE and DOE will develop separate OH&S guidelines relevant to the nature of the work to be undertaken under the grant agreement. DOE will provide OH&S to the village cooperatives and the contracted workers as part of their program training outreach activities.

8.4. Sexual Exploitation and Abuse and Sexual Harassment

Fiji ratified the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) in 1995. By ratifying CEDAW, it has made a commitment to ensure that the principles of equality are adhered to and that discriminatory practices including sexual exploitation and abuse and sexual harassment are abolished. Provisions to prevent sexual exploitation and abuse and sexual harassment will be included in the Code of Conduct for Project staff and for contracted workers in

line with relevant national laws and legislation, see **Attachment B**.

9. WORKERS' GRIEVANCE MECHANISM

General Project Workers' Grievance Mechanism

The project will use the existing MOE complaints and feedback system to receive, resolve and document all project related grievances, including worker grievances. Complaints can be made via this email address: EconomyInformation@economy.gov.fj. Information about the mechanism is also publicly available at the MOE website. The mechanism will receive complaints of a sensitive nature, including with respect to gender based violence, sexual exploitation, assault and harassment on a confidential and anonymous basis as per the MOE existing GRM protocol.⁷ Grievances of a sensitive nature are directed to trained professionals with the MOE human resources department. General complaints will be received and addressed by the Head of Administration and the Permanent Secretary for Economy- Mr. Shiri Gounder. Project workers can file grievances relating to the project activities via the following mediums:

- Letter, facsimile, phone contact on (679) 3221300/ 9996250 or email to: EconomyInformation@economy.gov.fj.
- In person at Level 5, Ro Lalabalavu House, Ministry of Economy and contact The Head of Administration.

The timeframe that a complaint gets responded or addressed to is within the day. Complaints that may require further investigation may take longer. Direct and Contracted Workers will be informed of the workers' grievance mechanism within 60 days of the project effective date or as employed. The WGM will be easily accessible and measures will be put in place to protect workers against reprisal for its use. The WGM can be used to raise workplace related concerns including about the terms of employment, rights at work, sexual exploitation, abuse, and harassment, unsafe or unhealthy work situations and others.

FNPF staff will have access to the MOE Workers' Grievance Mechanism however they will also be able to file grievances via the FNPF Workers Grievance Mechanism which allows employees to raise any issues, including in a confidential manner, related to their employment directly within their immediate supervisor within the specified timelines. The FNPF Workers Grievance Procedure articulates the process and timelines meeting requirements of the Fijian Employment Relations Act and consistent with ESS2. FNPF retain trained counselors to address staff grievances of a sensitive nature, including with respect to gender based violence, sexual harassment and assault. The Fijian legislative framework will apply to the TOR for the TA consulting firm and reviewed for material consistency with ESS2 by the PMU ES Specialists and World Bank staff before providing a No Objection. The TA TOR will be developed as part of project implementation.

In the event that an issue cannot be resolved within FNPF or the MOE Workers Grievance Mechanism within seven days, it will be escalated to the Project Management level where the Environment and Social Specialist will serve as Grievance Focal Point. The Grievance Focal Point will coordinate with relevant departments/organizations and persons to address these grievances. The Project Manager will review the record all worker grievances on a weekly basis and report on the grievances, response time and resolution status in the quarterly report to the WB.

⁷ The Project Stakeholder Engagement Plan outlines the project GRM which is established for issues that are not worker or workplace related but may apply to issues such as worker community interactions.

The project WGM will operate as follows:

1.The complainant may report their grievance in person, by phone, text message, mail or email (including anonymously if required) to MOE or the contractor as the initial focal point for information and raising grievances.

2.For complaints that are satisfactorily resolved at this stage, the incident and resultant resolution will be logged and reported to the PMU Grievance Focal Point. The Focal Point endeavors to address and resolve the complaint and inform the complainant in two weeks or less. For complaints that are satisfactorily resolved by the Focal Point, the incident and resultant resolution will be logged by the Focal Point. Where the complaint is not resolved, the Focal Point will refer to the Project Manager for further action or resolution.

3.As a third step, if the matter remains unresolved, or the complainant is not satisfied with the outcome, the Project Manager will refer the matter to the MHMS Permanent Secretary, which will aim to resolve the grievance in three weeks or less. The Grievance Focal Point will log details of issue and resultant resolution status.

4.If the complaint remains unresolved or the complainant is dissatisfied with the outcome proposed by the MHMS Permanent Secretary, the complainant may refer the matter to the appropriate legal or judicial authority, at the complainant's own expense. A decision of the Court will be final.

The grievance mechanism is not an alternative or substitute for the legal system for receiving and handling grievances and will not preclude access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures. While all employees always have the right to access the legal system, the purpose of establishing a grievance mechanism is to provide an accessible and practical means to mediate and seek appropriate solutions, wherever possible.

Workers' Grievance Mechanism Channel for JFN2 Program

These complaints will be received and addressed by MOE. This mechanism channel is for contracted workers engaged by a grant recipient village cooperative under the JFN2 Program. Grievances may be lodged through the following means:

- By Phone: [TBC: Insert name, position and contact number]
- By email: [TBC: Insert name, position and email address]
- In person: [TBC: insert name and position of contact person and address]

1. The GM includes the following steps:

- Step 1: Complainant lodges complaint
- Step 2: MOE receives/accepts the complaint.
- Step 3: Complaint will be acknowledged (within 24 hours or on the next working day)
- Step 4: Complaint will be assigned to respective unit or office within MOE and shared with the Project the ES Specialist.
- Step 5: Complaint resolution

- Step 6: Complaint resolved
2. GM timeframe. The process of grievance resolution is not expected to take longer than 10 working days for normal complaints. Initial assessment of the complaint will seek to confirm if the issue is related to the project funded activity and confirm other relevant details. Complaints that require further investigation may take longer, in which case the complainant will be advised.
 3. Confidentiality and complaints of a sensitive nature. All complaints are treated with the utmost confidentiality and any information provided is used strictly for the purposes of resolving grievances. Complaints received pertaining to gender-based violence, sexual assault or harassment are referred to trained professionals in the Ministry of Women.

The operation of the project's Grievance Mechanism will be regularly monitored. Patterns of complaints will be assessed for required adjustments or corrections to the project's operation or requirements.

Attachment A: Relevant national legislation and international conventions ratified by Fiji

National legislation	Year adopted	Weblink
Constitution of the Republic of Fiji	2013	https://www.laws.gov.fj/ResourceFile/Get/?fileName=2013%20Constitution%20of%20Fiji%20(English).pdf
Employment Relations Act	2007	https://www.laws.gov.fj/Acts/DisplayAct/483
Employment Relations (Administration) Regulations	2008	https://laws.gov.fj/Acts/DisplayAct/483#
Employment Relations (National Minimum Wage) Regulations	2015	https://laws.gov.fj/Acts/DisplayAct/483#
Hazardous Occupations Prohibited to Children under 18 Years of Age Order	2013	https://laws.gov.fj/Acts/DisplayAct/483#
Human Rights Commission Act	1999	https://www.hurights.or.jp/archives/database/nhri-law-fiji.html#18
Rights of Persons with Disabilities Act	2018	https://www.ilo.org/dyn/natlex/docs/ELECTRONIC/107420/132231/F-623634238/FJI107420.pdf
Maritime Transport Act	2013	https://www.laws.gov.fj/Acts/DisplayAct/570#
ILO Conventions - Fundamental		
C029 - Forced Labor Convention, 1930 (No. 29)		https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312174:NO
C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)		https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312232:NO
C098 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98)		https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312243:NO
C100 - Equal Remuneration Convention, 1951 (No. 100)		https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312245:NO
C105 - Abolition of Forced Labor Convention, 1957 (No. 105)		https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312250:NO
C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111)		https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312256:NO
C138 - Minimum Age Convention, 1973 (No. 138)		https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312283:NO
C182 - Worst Forms of Child Labor Convention, 1999 (No. 182)		https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312327:NO
ILO Conventions - Governance		

C081 - Labor Inspection Convention, 1947 (No. 81)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312226:NO
C122 - Employment Policy Convention, 1964 (No. 122)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312267:NO
C129 - Labor Inspection (Agriculture) Convention, 1969 (No. 129)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312274:NO
C144 - Tripartite Consultation (International Labor Standards) Convention, 1976 (No. 144)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312289:NO
ILO Conventions - Technical	
C011 - Right of Association (Agriculture) Convention, 1921 (No. 11)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312156:NO
C012 - Workmen's Compensation (Agriculture) Convention, 1921 (No. 12)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312157:NO
C019 - Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312164:NO
C026 - Minimum Wage-Fixing Machinery Convention, 1928 (No. 26)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312171:NO
C045 - Underground Work (Women) Convention, 1935 (No. 45)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312190:NO
C084 - Right of Association (Non-Metropolitan Territories) Convention, 1947 (No. 84)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312229:NO
C085 - Labor Inspectorates (Non-Metropolitan Territories) Convention, 1947 (No. 85)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312230:NO
C108 - Seafarers' Identity Documents Convention, 1958 (No. 108)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312253:NO
C142 - Human Resources Development Convention, 1975 (No. 142)	https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO:12100:P12100 INSTRUMENT ID:312287
C149 - Nursing Personnel Convention, 1977 (No. 149)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312294:NO
C155 - Occupational Safety and Health Convention, 1981 (No. 155)⁸	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312300:NO
C159 - Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No. 159)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312304:NO
C169 - Indigenous and Tribal Peoples Convention, 1989	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100 INSTRUMENT ID:312314:NO

⁸ I note that occupational safety and health is outside the scope of this report.

(No. 169)	
C172 - Working Conditions (Hotels and Restaurants) Convention, 1991 (No. 172)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312317:NO
C181 - Private Employment Agencies Convention, 1997 (No. 181)	https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO:12100:P12100_INSTRUMENT_ID:312326
C184 - Safety and Health in Agriculture Convention, 2001 (No. 184)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312329:NO
MLC, 2006 - Maritime Labor Convention, 2006 (MLC, 2006)	https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:91:0::NO:91:P91_INSTRUMENT_ID:312331:NO
Other international conventions	
Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)⁹	https://www.ohchr.org/documents/professionalinterest/cedaw.pdf
Convention on the Rights of Persons with Disabilities (CRPD)¹⁰	https://www.ohchr.org/EN/HRBodies/CRPD/Pages/ConventionRightsPersonsWithDisabilities.aspx
Convention on the Rights of the Child (CRC)¹¹	https://www.ohchr.org/en/professionalinterest/pages/crc.aspx
International Covenant on Economic, Social and Cultural Rights (ICESCR)¹²	https://www.ohchr.org/en/professionalinterest/pages/cescr.aspx

⁹ Article 11 deals with employment.

¹⁰ Article 27 deals with work and employment.

¹¹ Article 32 deals with the right of a child to be protected from economic exploitation and from performing any work that is likely to be hazardous, harmful or to interfere with their education.

¹² Articles 6 and 7 deal with the right to work.

Attachment B: Guidance for the Code of Conduct for direct workers and contracted workers

The PMU will ensure that direct workers and contracted workers abide by a suitable workplace Code of Conduct which contains obligations on all direct workers (other) and contracted workers. Additional obligations may be added to the minimum requirements outlines below. Additional obligations will respond to particular concerns of the region, the location and the project sector or to specific project requirements. The Code of Conduct will be prepared by the PMU Environment and Social Specialist prior to the preparation of the procurement documents and endorsed by the World Bank; this commitment is reflected within the ESCP. The Code of Conduct will build upon the existing MoE and FNPF Code of Conduct and shall contain a statement that the term ‘child’/ ‘children’ means any person(s) under the age of 18 years.

The issues to be addressed include:

1. Compliance with applicable laws, rules, and regulations
2. Compliance with applicable health and safety requirements to protect the local community (including vulnerable and disadvantaged groups), the Employer’s and Project Manager’s personnel, and the Contractor’s personnel, including sub-contractors and day workers, (including wearing prescribed personal protective equipment, preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment)
3. The use of illegal substances
4. Non-Discrimination in dealing with the local community (including vulnerable and disadvantaged groups), the Employer’s and Project Manager’s personnel, and the Contractor’s personnel, including sub-contractors and day workers (for example on the basis of family status, ethnicity, race, gender, religion, language, marital status, age, disability (physical and mental), sexual orientation, gender identity, political conviction or social, civic, or health status)
5. Interactions with the local community (ies), members of the local community (ies), and any affected person(s) (for example to convey an attitude of respect, including to their culture and traditions)
6. Sexual harassment (for example to prohibit use of language or behavior, in particular towards women and/or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate)
7. Violence including sexual and/or gender-based violence (for example acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion, and deprivation of liberty)
8. Exploitation including sexual exploitation and abuse (for example the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading behavior, exploitative behavior or abuse of power)¹³
9. Protection of children (including prohibitions against sexual activity or abuse, or otherwise unacceptable behavior towards children, limiting interactions with children, and ensuring their safety in project areas)
10. Sanitation requirements (for example, to ensure workers use specified sanitary facilities provided by their employer and not open areas)
11. Avoidance of conflicts of interest (such that benefits, contracts, or employment, or any sort of

¹³ Please take note of the WB guideline: <https://pubdocs.worldbank.org/en/632511583165318586/ESF-GPN->

preferential treatment or favors, are not provided to any person with whom there is a financial, family, or personal connection)

12. Respecting reasonable work instructions (including regarding environmental and social norms)

13. Protection and proper use of property (for example, to prohibit theft, carelessness or waste)

14. Duty to report violations of this Code

15. Non retaliation against workers who report violations of the Code, if that report is made in good faith.

The Code of Conduct should be written in plain language and signed by each worker to indicate that they have:

- received a copy of the code;
- had the code explained to them;
- acknowledged that adherence to this Code of Conduct is a condition of employment; and
 - understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.

A copy of the code shall be displayed in a location easily accessible to the community and project affected people. It shall be provided in languages comprehensible to the local community, Contractor's personnel (including sub-contractors and day workers), Employer's and Project Manager's personnel, and affected persons.

ANNEX 5 ENVIRONMENTAL AND SOCIAL CODE OF PRACTICE

This Annex lists a set of generic environmental and social management measures for commonly encountered E&S issues during the general plantation and rehabilitation activities and operation under the AF project. It is intended to serve as a generic ESCOP, which will be included in the agreement with village cooperatives for implementation, after incorporating subproject-specific context and measures as relevant when needed.

The Environmental and Social Code of Practice in the table below stipulates mitigation measures to be employed by project groups in the implementation of Component 4 Jobs for Nature 2.0 Activities. Community Groups employed are to adhere to World Banks Environment and Social Framework as well as the Fiji's domestic laws and regulations in the field of E&S risk management.

Generically Environmental and Social Impact Mitigation Measures

Impact Factor	Mitigation Measures
Waste gas/Dust	<ol style="list-style-type: none"> (1) All care should be taken in the preparation of the site for plantation and rehabilitation. Proper signages should be placed in visibly appropriate areas. (2) Members of the public should be informed of the times that plantation and rehabilitation work will be carried out. (3) Grievance mechanism should be made known to the public should they have complaints during the plantation and rehabilitation period. (4) Small works material that may cause dust suspension, such as cement and lime, should be stored indoors or in tank. Waste earth and solid waste should be stored together, and reasonable measures should be taken for the temporary storage site, including pavement, covering, and greening. Burning of any solid waste should not be allowed on site. (5) No temporary concrete batching plant should be set on site and instead commercial concrete should be used. When on-site mortar and concrete mixing is necessary, measures should be taken to ensure that there is no spill, leakage, or dumping. (6) Use of low-sulfur gasoline or diesel for construction machine and vehicle is encouraged. Additionally daily maintenance should be improved to ensure proper use and compliance with applicable emission standards. (7) Excavated land and earth on construction site should be covered with fine-mesh net. Waste earth should be cleaned off the site and vegetation should be restored in a timely manner. (8) Village cooperatives should ensure that air pollutants produced during construction should adhere to Fiji's Environment Management (Waste Disposal and Recycling) Regulations 2005 SCHEDULE 5 NATIONAL AIR QUALITY STANDARDS PART A - AMBIENT AIR QUALITY STANDARDS and Part B Emission Standards.
Wastewater	<ol style="list-style-type: none"> (1) The village cooperatives should ensure that all wastewater generated from the subproject facility is not directly discharged into the environment prior to proper treatment. (2) Existing local domestic sewage collection facilities should be used as much as possible, otherwise temporary septic tank and oil separation tank should be built for wastewater collection and treatment. (3) Storage of construction material, spoil and earth from excavation should be far away from water body, and retaining measures should be taken for soil conservation, such as soil bag retaining wall or interception ditch around storage area. (4) Large quantity earth excavation should be avoided in heavy rain days and necessary water and soil conservation measures should be taken for temporary construction material and construction spoil storage. Drainage system of project site should be well maintained. (5) Oil and chemicals should be stored in separate paved area on construction site. Waste oil and chemicals should be collected, and uncontrolled

Impact Factor	Mitigation Measures
	<p>dumping should not be allowed.</p> <p>(6) Domestic solid waste, construction solid waste, and repair and maintenance solid waste have potential impact to water body, and these solid wastes should be collected, sorted, and treated. Reusable solid wastes, like paper, wood, metal, and glass could be provided to external purchaser for reuse or collected by waste collection company approved by the Department of Environment, and unusable solid wastes should be collected by either a municipal council or waste collection company approved by the Department of Environment.</p> <p>(7) All liquid waste produced on sites should adhere to Fiji's Environment Management (Waste Disposal and Recycling) Regulations 2005 SCHEDULE 3: NATIONAL LIQUID WASTE STANDARDS</p>
Noise	<p>(1) Plantation and rehabilitation should be properly scheduled to avoid and minimize noise impact on nearby communities;</p> <p>(2) Advanced construction process and low noise equipment should be used.</p> <p>(3) Equipment should be maintained on regular basis and operation procedure should be strictly followed to avoid abnormal noise.</p> <p>(4) Management of material transportation vehicle should be enhanced, especially horns restriction.</p> <p>(5) Transportation route should be designed avoiding residential area and schools as appropriate.</p>
Solid Waste	<p>(1) ENVIRONMENT MANAGEMENT (WASTE DISPOSAL AND RECYCLING) REGULATIONS 2007 and Public Health Act should be always adhered during the construction period in the handling of solid waste. Construction site should be kept clean and tidy. Domestic and construction solid wastes should be separately collected and stored for collection by municipal sanitation utility.</p> <p>(2) The village cooperatives/ subcontractors must not undertake incineration or open burning of wastes of any sort within the facility premises.</p> <p>(3) All organic waste produced should be composted.</p> <p>(4) Generation of solid waste should be minimized during construction and solid wastes should be reused as much as possible. Solid waste sorting should be done, and large size bricks and waste steel bar should either reused or recycled.</p> <p>(5) Village cooperatives are to engage waste collection company or cart their waste to Fiji's Department of Environment approved landfill.</p> <p>(6) For the potential e-waste (e.g. retired electronic equipment), the E-Waste Management Plan (EWMP) developed under the parent project will be followed to ensure that all these wastes are properly recorded, tracked and finally disposed of as per the EWMP.</p>
Water and Soil Conservation	<p>(1) Area affected by plantation and rehabilitation activities should be strictly restricted to minimize disturbance to land vegetation.</p> <p>(2) Non vegetated excavated land should be covered temporarily to reduce soil loss.</p> <p>(3) Earth excavation should be avoided in rainy days to prevent soil erosion and generation of muddy runoff.</p> <p>(4) Land temporarily occupied should be restored once plantation/rehabilitation is completed, including greening.</p> <p>(5) The following measure should be taken for earth take area/quarry:</p> <ul style="list-style-type: none"> ✧ Existing commercial quarry and borrow area should be used as possible to avoid excavation on new site. ✧ New quarry or earth borrow area should not be in environmentally sensitive area, such as natural reserve, scenic area, forest park, water source protection zone and geologically vulnerable area. Site selection for quarry and borrow area should be approved by environmental supervisor and concerned relevant Authority. ✧ Temporary soil conservation measures should be taken for quarry, borrow area and storage site. ✧ When use of quarry or borrow area is over, village cooperatives should make sure rehabilitation should be done for all the borrow areas, including measures for slope stability, restoration for farming and restoration of natural water channels. ✧ Priority should be given to local plant species for restoration of land vegetation. <p>(6) Depending on where the project sites are located, the relevant approving authority is to be consulted by village cooperatives in identifying restoration purposes of the borrow area for example fishpond or other purposes. The following measures should be taken for earth deposit site:</p>

Impact Factor	Mitigation Measures
	<ul style="list-style-type: none"> ❖ Site selection of the earth deposit site should be based on technical design and the EIA. ❖ New earth deposit site should not be set in environmentally sensitive areas, such as natural reserve, scenic area, forest park and water source protection zone. Low-lying area with large capacity and undeveloped valley and land should be selected as possible to reduce soil loss. The earth deposit site should not be set along river or lake. Impact on flood discharge and irrigation functions of river, valley, drainage system, and water channel should be avoided. Safety of downstream farmland and buildings should be considered. Disposal site should not be located upstream of residential area. ❖ New earth deposit site should be designed by the design institute and retaining, slope protection, drainage and restoration program should be in place. Deposit site design should be approved by relevant approving authority depending on where the construction is located. ❖ 30 cm deep natural surface soil should be kept and stored with retaining measures for preventing soil loss. Retained surface soil will be used for farming restoration once construction is completed. ❖ Water interception ditches should be built on the top and around the site for soil loss control and slope stability. ❖ When use of disposal site is over, restoration of disposal site should be immediately kicked off, including covering with local surface soil and greening. Local plant species should be used as much as possible.
Ecology and Biodiversity conservation	<ol style="list-style-type: none"> (1) Training on wild animal and plant protection should be provided for construction workers. (2) Scope of plantation and rehabilitation activities should be restricted to avoid damage to vegetation outside construction site. (3) For permanent and temporary farmland and vegetated land occupation, existing surface soil should be retained and used for site restoration and greening along the road once construction is completed. Land vegetation should be restored as soon as possible when construction is completed. (4) Any herbicide or pesticides legally restricted should not be used during the plantation and rehabilitation period. . (5) In the event important plant species under protection are found during construction, local authority along with Ministry of Environment should be immediately informed and protection measures should be taken as required. (6) When plantation and rehabilitation is near wild animal habitat, implementation plan should be carefully designed for noise control during early morning, noon and dusk to minimize disturbance to wild animals. (7) Ecology restoration should be well implemented once plantation and rehabilitation is completed to minimize impact on animals due to ecological environment damage. (8) Plantation and rehabilitation should use local indigenous species, and shall not introduce foreign species in any circumstances. (9) Seedlings for nursery and plantation shall be from certified sources, free of disease, pest and invasive species.
Information Sharing, Grievance Redress and other Social Impacts	<ol style="list-style-type: none"> (1) Subproject information sign should be posted at site providing channels for complaints of affected residents. (2) Interference of public utility services should be minimized. If interference cannot be avoided, project information should be reported to the local authority in advance and be disclosed to affected residents. Affected time should be shortened as much as possible. (3) Effective grievance redress mechanism should be established, and focal point should be designated by village cooperatives. (4) Grievance redress mechanisms are to be properly documented and each complaint documented.
Protection of Culture Relics	<ol style="list-style-type: none"> (1) Information of cultural relics in project area and requirements for protection measures should be collected before plantation and rehabilitation. (2) Advance approval of cultural heritage authority should be obtained when project activities have potential impact on cultural relics. (3) Scope of plantation and rehabilitation activities should be strictly restricted to keep project activities off cultural relic protection scope. (4) Training on cultural relic protection should be provided for community workers to prevent damage to cultural relics during plantation and rehabilitation. (5) Project activities should be immediately suspended once cultural relics are found. Site protection measures should be taken, and Department

Impact Factor	Mitigation Measures
Labor Procedures	<p>of Heritage and Arts should be informed.</p> <ol style="list-style-type: none"> (1) Obey requirements of the national legislation and the Project LMP; (2) Provide workers with evidence of all payments, including benefits and deductions; (3) Provide all contracted workers with health insurance that covers treatment for COVID-19 infections; (4) Maintain records regarding labor conditions and workers engaged under the Project, including contracts, registry of induction of workers including Code of Conduct, hours worked, remuneration and deductions (including overtime); (5) Ensure no child under 18 or forced labor is engaged in the Project. (6) Implement the grievance mechanism for workers.
Prevention of Gender Based Violence, Sexual Exploitation and Abuse and Sexual Harassment	<p>Adopt and comply with relevant requirements set out in the Code of Conduct attached to the LMP, including:</p> <ol style="list-style-type: none"> (1) Prevention of sexual harassment (2) Prevention of violence including sexual and/or gender-based violence (3) Prevention of exploitation including sexual exploitation, and (4) Protection of children (including prohibitions against sexual activity or abuse, or otherwise unacceptable behavior towards children, limiting interactions with children, and ensuring their safety in project areas)
Worker Safety and Occupational Health	<ol style="list-style-type: none"> (1) Safety management organization should be established, and dedicated safety management staff should be assigned by village cooperatives. (2) Occupational health and safety training should be provided for all the workers covering general rules in workplace, personal protection rules as well as how to protect coworkers. (3) Appropriate PPE should be provided for workers, including glove, helmet, and protective shoes, in order to adequately protect on-site workers, other co-workers and visitors. (4) Proper first-aid supplies should be made available on site. When project site is located in remote area, written medical emergency response procedure should be in place for guiding onsite treatment and transfer of the patient to hospital. (5) Proper warning signs should be posted in dangerous area, at equipment, material storage site and emergency exit. (6) Path to emergency exit should be kept off any obstacle all the time. Eye-catching signs should be set at the exit to make sure the sign can be seen even in the dark. (7) Warning signs should be put on for all the powered equipment and cables. (8) Adequate fire-fighting equipment and material should be made available on site to meet applicable laws and regulations. (9) Operators of special vehicles and machines should have license, receive operation safety training, and be provided with necessary protective equipment. (10) Eligible guarding rails should be installed around dangerous area and meanwhile fall prevention equipment should be used for workers like protective net, safety belt and safety wire. (11) Safety inspection log should be prepared by village cooperative safety staff each day. (12) Health education should be provided for village workers through communication and face to face consultation to improve personal behavior. Personal protection measures are encouraged, for example use of condom to prevent transmission of infectious diseases. Additionally, protective measures are encouraged to prevent transmission of infectious diseases from mosquito, such as use of anophelifuge, clothes and bed net. (13) Traffic safety measures associated with transportation vehicle during plantation/rehabilitation are to follow Fiji's roads and traffic laws. (14) The village cooperatives/subcontractors will take all reasonable steps to ensure that the "Safety and Health at Work Act" is complied with by all persons on the premises, both as regards personal safety and the handling of hazardous substances.

Impact Factor	Mitigation Measures
	(15) Assign a designated safety officer, conducting training on and implementing OHS measures and measures to mitigate the spread of COVID-19, recording safety incidents
Community health and safety	<ul style="list-style-type: none"> (1) Safety Control and Signage to be used in vicinity of works; (2) Notify villagers in advance of schedule and duration of works. (3) Consultations and care taken to minimize disruptions to access. (4) Install temporary access to affected properties where required. (5) Emphasizing safety aspects among drivers, and improving driving skills and requiring licensing of drivers; (6) Adopting limits for trip duration and arranging driver rosters to avoid overtiredness; (7) Avoiding dangerous routes and times of day to reduce the risk of accidents (8) Use of speed control devices (governors) on trucks, and remote monitoring of driver actions; (9) Collaboration with local communities and responsible authorities to improve signage, visibility and overall safety of roads, particularly along stretches located near schools or other locations where children may be present; (10) Collaborating with local communities on education about traffic and pedestrian safety (e.g. school education campaigns); (11) Coordination with emergency responders to ensure that appropriate first aid is provided in the event of accidents; (12) Using locally sourced materials, whenever possible, to minimize transport distances; (13) Locating associated facilities such as worker camps close to project sites and arranging worker bus transport to minimizing external traffic ; (14) Workers Code of Conduct setting clear rules for the behavior of all employees
COVID-19 Control/Public Health	<ul style="list-style-type: none"> (1) All measures should be taken to adhere to Fiji governments Covid-19 restrictions by contractors and any subcontractors. The following restrictions are to be adhered to by contractor and subcontractors: (2) Internal COVID-19 control system and organization should be established by village cooperatives. (3) Health information of workers should be documented, reported as required by local authority and should be managed by category. (4) Daily body temperature test should be done as required. Infrared thermometer should be used when worker are into and out of the work place, and abnormal cases should be immediately reported and appropriate control measures should be taken. (5) Project site should be enclosed as necessary and entry of all the people should be strictly controlled. (6) Travel of the workers should be strictly controlled and documented, including name, body temperature, travel route, transport tool, time, and reason for traveling. (7) External vehicles for delivering material and supplies should be strictly documented. Personal protection measures should be well taken for workers that go out for shopping and time of in and out and travel route should be documented. (8) Isolated medical observation room should be set and should be equipped with dedicated medical staff. Disinfectant and medical facial mask should be adequately prepared, and body temperature examination area should be set. <ul style="list-style-type: none"> a. Disinfection of facility and equipment should be done as required by local health authority.

ANNEX 6 JOBS FOR NATURE 2.0 FIJI APPLICATION FORM

FIJI SOCIAL PROTECTION COVID -19 RESPONSE AND SYSTEM DEVELOPMENT PROJECT

JOBS FOR NATURE 2.0 FIJI PROGRAM APPLICATION FORM

Section 1 – Applicant Information:

Village Cooperative/ Youth Group/ Women Group/:	
Province:	
2 Contact Persons Names:	
Mailing Address:	
Telephone/Mobile No 1:	E-mail Address:
Telephone/Mobile No 2:	
ID Cards: <input type="checkbox"/> Joint Card <input type="checkbox"/> Voter ID	
Types of Jobs for Nature 2.0: (please tick where necessary)	
<p>Wetland Protection</p> <p><input type="checkbox"/> Mangrove planting</p> <p><input type="checkbox"/> Seagrass planting</p> <p><input type="checkbox"/> Restoring waterways</p> <p><input type="checkbox"/> Waste and wastewater management</p>	
<p>Riverbank Rehabilitation and Coastal Bank Protection</p> <p><input type="checkbox"/> Mangrove planting</p> <p><input type="checkbox"/> Vetiver grass planting</p>	
<p>Enhancing Biodiversity</p> <p><input type="checkbox"/> Forest Restoration</p> <p><input type="checkbox"/> Land upgrading through native tree planting</p> <p><input type="checkbox"/> Coral reef protection</p>	
Amount of fund applied:	
Total financing:	
Identify Trainings that your group may need	<input type="checkbox"/> Financial Literacy <input type="checkbox"/> Book Keeping <input type="checkbox"/> Planting Vetiver/Mangrove <input type="checkbox"/> Waste and wastewater management <input type="checkbox"/> Climate Change <input type="checkbox"/> FNPF Awareness (Voluntary contribution & contribution) <input type="checkbox"/> others (please define)

Section 2 – Project Activities

Please provide a detailed project proposal of the green job’s activity associated with this fund application as an annex document of this form. The proposal should include the following information:

1. Project Title

2. Goal

3. Objectives- link project activity to sustainability of project.

4. Description of project area

5. Environment situation

6. Project Duration

7. Beneficiary target- describe group members

- **8. Methodology and Implementation Plan** Site photos, and other supporting documents if relevant

9. Budget- Wages and hours of people employed to carry out the project tasks.

Section 3 - Declarations and Consent to Use Personal Information

By submitting this form for benefits under the Jobs for Nature 2.0 Fiji, I/We:

- certify that all the information provided is complete and correct
- understand that personal information on this form will be used for determining eligibility for program assistance and will be shared for program management and monitoring & evaluation
- agree to participate in an evaluation and/or audit of the program
- Consent to the public release of my/ our village/settlement name, the amount of funding received, and the general nature of the project.

I, certify that the information given on this application is to the best of my/our knowledge complete, true, and accurate.

Name of Applicant/ Group Leader Signature of Applicant/Group Leader Date

Section 4 – Submission of the Application

Please submit completed application form or direct inquiries to:

Ministry of Environment

PO Box 2109, Government Buildings, Suva.

Telephone: 3311699 Email: jobsfornature@gmail.com

Date Application Received (Office Use Only)	Date Application was Approved (Office Us Only)