



THE PROPOSED

CONSTRUCTION ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

FOR

1st Package Communal Toilet Rehabilitation

(South Tarawa Sanitation Project (STSP) – Refurbishment of 30 Communal)

REF. KI-MISE-466547-CW-RFQ

Prepared by:

NL

KHL Project Manager

BETIO, SOUTH TARAWA

REP. OF KIRIBATI



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Table of Contents

1. Introduction	4
2. Project Description and Scope	4
3. Project Site	5
4. Overall Site Management.....	7
4.1 Organization Structure of KHL	7
4.2 Roles and responsibilities each Staff member	8
4.3 Key project staff contact details	9
5. Workforce Recruitment & Management	9
5.1 Workforce requirements	10
5.2 Age of employment.....	10
5.3 Occupational health and Safety	10
5.4 Work hours	11
5.6 Hiring Policy and Procedures.....	11
5.7 Worker’s Code of Conduct.....	12
5.8 Training	12
5.9 Recruitment	13
6. Environmental Incidents and emergency management plan	14
6.1 Purpose.....	14
6.2 Strategy.....	14
6.3 Reporting and Documentation	15
6.4 Response Procedures	15
6.4.1 Oil and Fuel Spills	15
6.4.2 Chemical and Hazardous Materials Spills	15
6.4.3 Disturbance of Heritage or Archaeological Sites.....	16
6.4.4 Unexploded Ordinance (UXO).....	16
6.4.5 Asbestos	16

7.	Design and implementation.....	19
7.1	Procurement and Recruitment.....	Error! Bookmark not defined.
7.2	Mobilisation	Error! Bookmark not defined.
7.3	Construction of toilets in batches	Error! Bookmark not defined.
7.4	Testing and Commissioning of toilet	Error! Bookmark not defined.
8.	Hazard identification and Risk Analysis Methodology.....	21
9.	Potential Environmental, Social, Health and Safety Risk and Mitigation Measures	22
10.	Incident Response and Management	42
10.1	Objectives.....	42
10.2	Incident and Near Miss Reporting.....	42
10.3	Incident Response Procedure.....	42
10.4	Investigation and Analysis	43
10.5	Immediate Action and Internal Notification.....	43
10.6	Emergency Contact Information.....	44
10.7	Non-compliance.....	44
10.8	Incident Investigation Reports.....	45
11.	Environment Specific Environmental Measures.....	45
11.1	Waste Minimization.....	45
11.2	Management of Hazardous Materials and Waste disposal procedure.....	47
11.3	Demolition Management Procedure.....	50
11.4	Sewerage Dis-connection and reconnection procedures	51
12.	Monitoring and Reporting	52
12.2	Reporting.....	52
12.1	Monitoring.....	53
12.2	Reporting.....	54
13.	Budget and Resource Allocation.....	55
14.	Annex	62

1. Introduction

The South Tarawa Sanitation Project (STSP) is supported through grant funding from the World Bank (WB) under the International Development Association 19 (IDA19) initiative. With a total investment aimed at improving sanitation infrastructure and environmental health outcomes in Kiribati's capital region, the project represents a key step toward sustainable urban development in South Tarawa.

The Ministry of Infrastructure and Sustainable Energy (MISE) serves as the Implementing Agency (IA), while the Ministry of Finance and Economic Development (MFED) acts as the Executing Agency (EA). The IDA19 grant supports both the implementation of technical components and overall project management activities.

Building upon the foundations laid by previous initiatives including the Sanitation and Public Health Education (SAPHE) Project funded by the Asian Development Bank (ADB), and the South Tarawa Sanitation Improvement Sector Project (STSISP), jointly supported by ADB and the Australian Department of Foreign Affairs and Trade (DFAT)—the STSP seeks to consolidate past achievements and introduce new, sustainable sanitation solutions tailored to the unique environmental conditions of South Tarawa.

As the project transitions from planning to implementation, the focus will be on delivering reliable and climate-resilient sanitation systems, enhancing community health, and strengthening institutional capacity for long-term maintenance and service delivery.

This CESMP is based on the STSP project Environmental and Social Impact Assessment (ESIA) and has been prepared in alignment with its mitigation measures.

2. Project Description and Scope

This project will cover the refurbishment of communal toilets blocks at every KHC sites in Betio. There are 30 communal toilets which are owned by Kiribati Housing Corporation (KHC) and located on KHC land in Betio.

The following works will be carried out under this project comprises the following key activities as stated in the 1st package communal toilet rehabilitation, ref KI-MISE-466547-CW-RFQ. The Bid is for the works to:

- Disconnect the existing communal toilet blocks from PUB sewer system
- Provide and maintain a temporary toilet facility for the local community to use during the construction
- Secure the site/ works area
- Assess the site for the presence of UXO
- Demolish and remove existing communal toilet blocks
- Clear and prepare the site for new communal toilets
- Construct communal toilets (30) located on existing locations and connect to the PUB sewer system
- Commission and hand over the completed communal toilet to the KHC; and
- Clear the site and landscaping

Objective of CESMP include:

- If not avoid, minimize environmental impacts;
- Protect human health;
- Prevent or compensate any loss of assets;
- Minimize impacts of cultural assets; and
- Improvement positive environmental and social effects.

If it is necessary to remove a tree associated with the work, then the contractor is to notify the Project Manager and the PMU's Safeguard team to ensure the owner(s) of the tree are informed and any arrangements associated with the removal of a tree are made. The Banana bush trees are to be removed as required.

3. Project Site

Construction activities will take place within multiple locations on lands owned by the Kiribati Housing Corporation (KHC) in Betio, South Tarawa. These sites are situated on government-owned land, both on the eastern and western sides of Betio (refer to Figures 1 and 2). As the sites fall under KHC jurisdiction, no land tenure or ownership disputes are anticipated.

All sites are accessible via existing main and feeder roads. In some cases, limited vegetation clearance—including the removal of small trees or temporary fences—may be required to

facilitate access and construction works. Any necessary tree removal will follow the procedures described in the approved Tree Management or Compensation Plan.

Site inspections confirmed that most locations provide adequate space within KHC boundaries to accommodate construction activities and temporary sanitation facilities. Where space is restricted, tenants will be notified in advance to allow the removal of temporary structures or obstructions prior to construction.

Temporary toilets will be installed before demolition begins to ensure continuous access to sanitation for users. These facilities will be connected to the PUB sewer network and maintained throughout construction.

Refer to General layout of the laydown area in figure XXXX. All occupational health, safety, and environmental requirements will be applied to minimize risks and maintain safe working conditions for both workers and visitors.

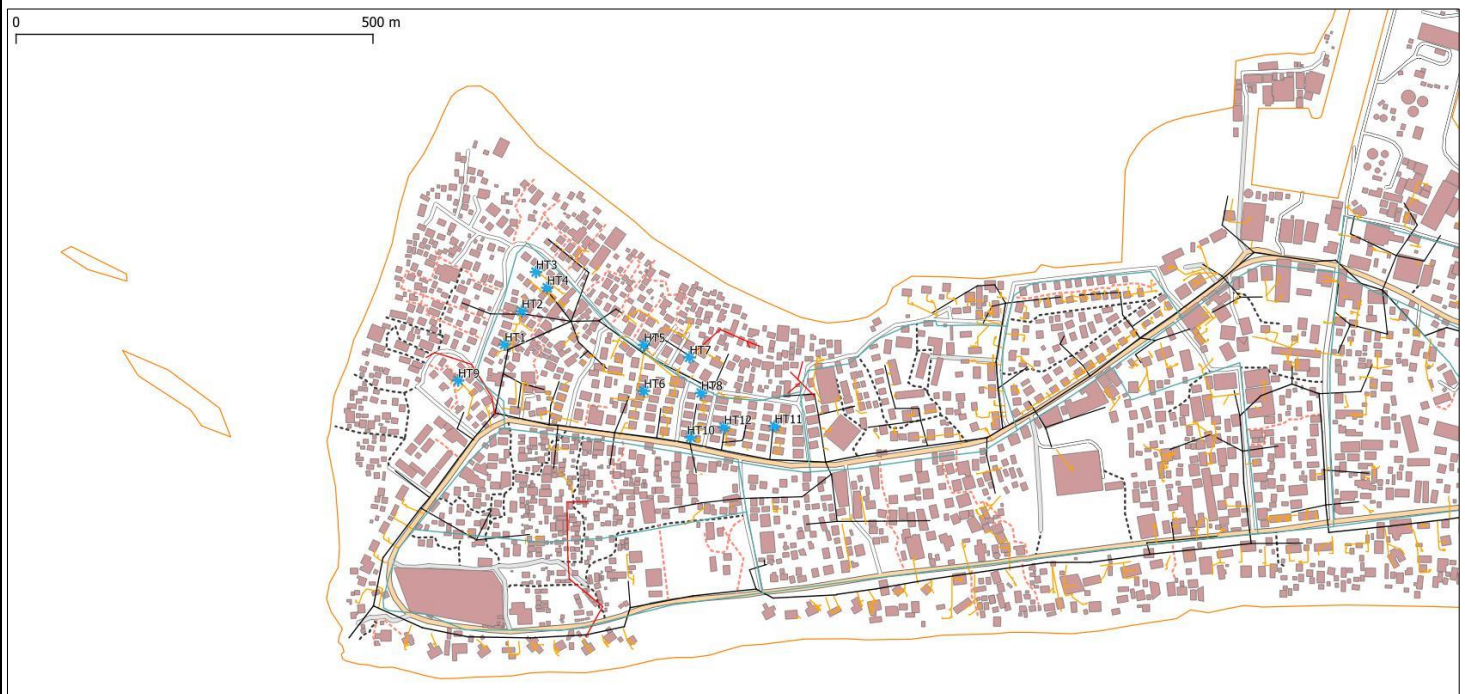


Figure 1. Toilets in Betio West



Figure 2. Toilets in Betio East

4. Overall Site Management

4.1 Organization Structure of KHL

The organizational structure of King Holdings Limited (KHL) for this Project is shown in Figure 3. It outlines the reporting lines and communication pathways for effective implementation of environmental, social, health, and safety (ESHS) measures during construction.

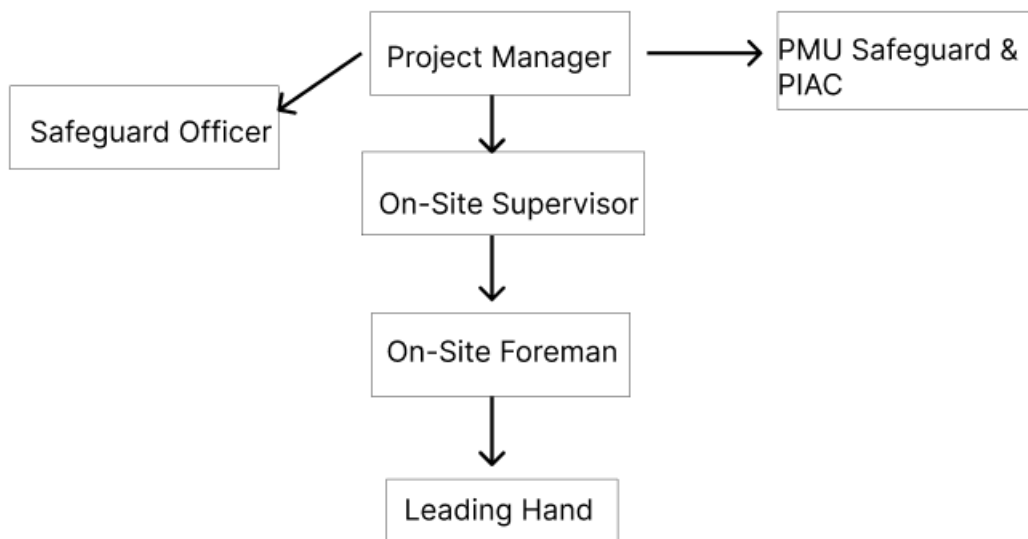


Figure 3. Organization Structure of KHL

4.2 Roles and responsibilities

Table 1 below outlines the key project roles and responsibilities for environmental and social management.

Table 1. Roles and Responsibilities

Title/Role	Responsibilities
Project Manager	Manages day-to-day site operations and ensures compliance with contractual obligations, schedules, and safety standards. Oversees construction team coordination, stakeholder engagement, and OHS compliance, including incident reporting and corrective action implementation.
Site Supervisor	Directly supervises daily work activities, ensures that tasks are completed as scheduled, and upholds the workers' Code of Conduct. Conducts daily OHS briefings, implements the GRM on-site, and ensures that first aid facilities and safety equipment are available.
Contractor/Foreman	Ensures adherence to construction specifications and safety protocols, conducts PPE checks, and enforces compliance with site safety procedures.
Environment Safeguard Officer	Develops, implements, and monitors the Project's Environmental Management Plan. Leads environmental and social compliance activities, conducts site inspections, and coordinates with the PMU Safeguards Team on monitoring and reporting.

All contracting staff will undergo a Project induction covering worksite protocols, OHS obligations, and emergency procedures.

The Contractor's Safeguard Officer, in coordination with the PMU Safeguards Team, will support stakeholder engagement and community liaison activities throughout the construction period.

4.3 Key project staff contact details

Table 2. Key project staff contact details

Name	Position	Email address	Phone No.
King Kumkee	Managing Director	kingkumkee@outlook.com	N/A
Nuati Lotolua	Project Manager	Nuati9188@gmail.com	+686-73028178
Roger Kumkee	On-Site Construction Supervisor	rogerkumkee@outlook.com	+686-73005929
Areau XXX	On-Site Construction Foreman	N/A	To be provided

5. Workforce Recruitment & Management

This section outlines the workforce management framework for the STSP, implemented KHL It establishes procedures for fair recruitment, safe working conditions, and effective Labor relations in alignment with:

- The Employment and Industrial Relations Code 2015 (Kiribati);
- World Bank Environmental and Social Standard 2 (ESS2): Labor and Working Conditions; and
- Applicable Environmental, Health, and Safety (EHS) Guidelines.

KHL shall ensure that all direct and contracted workers are employed under equitable, transparent, and lawful conditions. The Contractor will promote a positive working environment that upholds workers' rights, prevents child or forced Labor, and fosters capacity building through skills training.

Standard working hours will not exceed forty (40) hours per week, and the conditions for overtime, leave, and grievance redress will be clearly stated in individual employment contracts. All KHL employees and subcontractors shall comply with the Contractor's Labor Management Procedures (LMP) and the CESMP.

5.1 Workforce requirements

KHL shall maintain a workforce appropriate to the scope and duration of construction activities. All employment practices will comply with the Government of Kiribati (GoK) Labor laws, World Bank ESS2, and EHS Guidelines.

Priority will be given to local hiring where possible to enhance community participation and socio-economic benefits. A workforce registry will be maintained, recording each employee's position, age, contact information, and training status.

5.2 Age of employment

The minimum age for employment under this Project is 18 years. All applicants must provide valid proof of age and identity (national ID or equivalent documentation) prior to recruitment.

KHL and its subcontractors are strictly prohibited from engaging individuals below 18 years of age or using any form of forced Labor. Verification of employee ages shall be documented and made available for inspection by the PMU Safeguards Team.

5.3 Occupational health and Safety

KHL shall establish and maintain a safe and healthy workplace for all personnel in accordance with the Occupational Health and Safety Act, World Bank ESS2, and World Health Organization (WHO) guidelines.

Safety is a shared responsibility between management and workers. The Project Manager, in coordination with the PMU Safeguards Team, the Project Implementation Assistance Consultant (PIAC), and the Ministry of Employment and Human Resources (MEHR), will ensure that all OHS measures are implemented and monitored throughout construction.

Key OHS Provisions

- No worker shall perform a task they consider unsafe or beyond their training or authorization.
- All work must commence only after receiving appropriate safety instruction.
- Hazardous substances may only be handled by trained personnel following safe handling procedures.
- Mechanical guards and safety devices must remain in place and functional at all times.
- Unsafe conditions, acts, and near misses must be reported immediately to the Site Supervisor and recorded.

- All injuries and accidents shall be promptly reported to the Project Manager and, for serious cases, to MEHR's Health and Occupational Safety (HOS) Officer and the Ministry of Health and Medical Services (MHMS).
- Personal protective equipment (PPE) must be properly fitted, maintained, and worn at all times as required.
- All OHS records and training documentation shall be maintained by the Project Manager and submitted to the PMU for verification.

In addition, KHL will ensure the compliance with the Sexual Exploitation, Abuse, and Harassment (SEA/SH) requirements.

Kiribati ratified the *Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)* in 2004, affirming its commitment to equality and non-discrimination. KHL's Code of Conduct includes mandatory provisions to prevent SEA and SH, aligned with ESS2, national legislation, and World Bank's Good Practice Note on GBV (2018).

5.4 Work hours

Normal working hours will be 7:00 am to 5:00 pm, Monday to Saturday. Work outside these hours may occur when operationally necessary (e.g., large concrete pours or equipment installations).

When extended or night work is anticipated, KHL shall:

- Consult with nearby residents;
- Notify the PMU Safeguards Team at least one week in advance; and
- Manage noise and lighting impacts in consultation with the PMU and PIAC.

5.6 Hiring Policy and Procedures

All recruitment shall comply with Kiribati Labor laws and World Bank ESS2. Employment terms and conditions will be set out in written contracts signed by both parties and filed in accordance with legal requirements.

Recruitment procedures shall be fair, transparent, and non-discriminatory, ensuring equal opportunity regardless of gender, ethnicity, religion, or social background.

See Annex 5 for Contractor Labor Management Procedure

5.7 Worker's Code of Conduct

KHL has developed a Workers' Code of Conduct consistent with the STSP requirements, national legislation, and international standards. The CoC aims to ensure equality, prevent harassment, and eliminate SEA/SH.

All workers must:

1. Participate in induction and refresher training on OHS, GBV/SEA/SH, and grievance procedures.
2. Wear required PPE and comply with all site safety rules.
3. Abstain from alcohol or intoxicating substances during working hours.
4. Consent to police background checks if required.
5. Treat all persons—women, men, and children—with dignity and respect.
6. Refrain from any form of harassment, coercion, or exploitation, including sexual favors or relationships with community members.
7. Immediately report any suspected GBV, SEA, or violence against children (VAC) to the Project Manager or Safeguard Officer.

5.8 Training

KHL shall implement a comprehensive training and awareness program to ensure that all workers and subcontractors are competent and informed of their responsibilities.

Training topics

- Occupational Health and Safety
- Code of Conduct
- Grievance Redress Mechanism (GRM)
- Emergency Response and First Aid
- Waste Management
- HIV/AIDS and COVID-19 Awareness
- SEA/SH and Child protection

All new workers shall receive induction training during their first week of employment, covering general safety, emergency procedures, hazard identification, and site-specific risks. Refresher and remedial training shall be provided periodically or when non-compliance is observed.

Table 4. Training Schedule

Training Topic	Schedule	Participants	Organizer	Venue
Project Introduction	Prior to construction	Site Supervisors, Foremen	Project Manager	KHL Site Office
Environmental Induction	Prior to construction/installation	All site personnel and subcontractors	Safeguards Team	KHL Site Office
Safe Work Practices	Prior to entering site	All site personnel and visitors	Site Supervisor	KHL Site Office
COVID-19 & HIV Awareness	During induction	All KHL staff	MHMS – Public Health Division	KHL Site Office
Emergency & Spill Response	Prior to construction	All site personnel	Site Supervisor / Foreman	On-site
Remedial or Refresher Training	As required	Identified staff	Project Manager	On-site / Office

All training sessions will be documented with attendance records and retained for PMU audit.

5.9 Recruitment

Recruitment under this Project shall follow the principles of fairness, transparency, and equal opportunity as outlined in the Contractor Labor Management Procedures (LMP).

Key provisions include:

- Standard forty-hour workweek, with overtime and leave in accordance with contract terms.
- Mandatory verification of age and identity before employment.
- Prioritization of local hiring where feasible to promote community benefits.

- Clear communication of job descriptions, wages, and grievance procedures to all workers.
- Induction training for all recruits covering OHS, environmental management, and the Code of Conduct.

No foreign contractors or external technical specialists are anticipated for the Project. Therefore, risks associated with Labor influx, such as SEA/SH, communicable diseases, or social conflict, are considered low. Subcontractors such as Asbestos specialist and UXO survey team are procured by PMU team which apply STSP Labor Management Procedures.

6. Environmental Incidents and emergency management plan

This section outlines the procedures for responding to environmental incidents and emergencies that may occur during the implementation of the STSP. It summarizes the key elements of the Emergency Preparedness and Response procedure and defines the responsibilities of all site personnel in preventing, reporting, and managing emergency events.

6.1 Purpose

The purpose of this plan is to ensure an immediate, organized, and effective response to incidents or emergencies in order to minimize environmental, social, and health impacts. The plan establishes clear lines of responsibility, communication procedures, and response actions to contain and control incidents.

6.2 Strategy

All site personnel shall receive training on emergency response procedures and their specific roles in the event of an incident. Appropriate personal protective equipment (PPE) and spill containment materials will be available on-site at all times. Emergency drills will be conducted periodically to assess preparedness and improve response capability.

The Emergency Response Plan covers the following key scenarios:

- Oil and fuel spills
- Chemical and hazardous substance spills
- Disturbance of cultural heritage or archaeological sites (including human remains)
- Discovery of unexploded ordnance (UXO)
- Asbestos exposure or accidental release

6.3 Reporting and Documentation

The Project Manager holds overall responsibility for incident management and reporting. A Weekly Environmental Report shall be prepared by the On-site Supervisor, endorsed by the Construction Environmental Safeguard Officer, and submitted to the PMU Safeguards Team and the Project Implementation Assistance Consultant (PIAC).

Serious incidents (e.g., injury, contamination, heritage disturbance) must be reported immediately to the PMU and relevant authorities such as the Ministry of Environment, Lands and Agricultural Development (MELAD – Environment and Conservation Division).

6.4 Response Procedures

6.4.1 Oil and Fuel Spills

Objective: Prevent contamination of soil and water and ensure safe and prompt containment.

Response Steps:

1. Immediately alert all personnel and cease operations in the affected area.
2. Identify and isolate the source of the leak following appropriate safety procedures.
3. Deploy spill containment kits (booms, absorbent pads) to prevent spread.
4. Collect contaminated materials for safe disposal as per the Waste Management Plan.
5. Notify the Project Manager, who will inform the PMU Safeguards Team and MELAD (ECD).
6. Record the incident, corrective actions, and lessons learned in the Environmental Incident Log.

6.4.2 Chemical and Hazardous Materials Spills

Objective: Limit human exposure and prevent contamination of land and water resources.

Response Steps:

1. Immediately halt all work and evacuate non-essential personnel.
2. Identify the chemical and consult the Material Safety Data Sheet (MSDS).
3. Contain the spill using absorbent materials and remove contaminated soil.
4. Store hazardous waste in sealed, labeled containers pending proper disposal.
5. Notify the Project Manager to coordinate reporting with PMU and MELAD (ECD).
6. Conduct follow-up monitoring to confirm site restoration.

6.4.3 Disturbance of Heritage or Archaeological Sites

Objective: Protect any chance finds of cultural or archaeological significant in accordance with the Cultural Heritage Management Plan (Annex XX).

Response Steps:

1. Immediate STOP work in the affected area and secure the site
2. Mark boundaries to prevent further disturbance
3. Notify the Project Manager and PMU Safeguards Team
4. Await instructions from the PMU

6.4.4 Unexploded Ordinance (UXO)

Objective: Ensure the safety of all on-site personnel and prevent accidental detonation. A clearance certificate needs to be shared to the Contractor prior to moving to the construction site.

Response Steps:

1. Cease all operations and initiate immediate evacuation
2. Secure the area and restrict access
3. Notify the PMU, Office of Beretitenti, and MELAD (ECD)
4. Ensure to follow the UXO management plan
5. Resume work only after formal clearance is issued

6.4.5 Asbestos

Response: Prevent exposure to asbestos fibers and ensure safe containment and sound disposal.

Response Steps:

1. Suspend all activities in the affected area and evacuate on-site personnel
2. Notify the Project Manager and PMU Safeguards Team
3. Establish a safe perimeter using warning tape and signage
4. Engage a certified asbestos specialist to assess and manage removal
5. Dispose of asbestos in accordance with the Asbestos Management Guideline and national regulations.

7. Grievance Redress Mechanism

The Grievance Redress Mechanism (GRM) for this subcomponent was developed during the project's planning stage and is incorporated into the Environmental and Social Impact Assessment (ESIA) of the STSP. The mechanism provides a structured process for addressing grievances that may arise during project design, construction, and operation, ensuring concerns are handled promptly, fairly, and transparently.

This GRM focuses primarily on construction-related issues, recognizing that multiple stakeholders are involved in implementing and supervising construction works. It ensures that affected individuals and communities can raise complaints without fear of retaliation and that these are resolved through a clear and accessible process.

The Construction Contractor is responsible for publicizing the GRM and ensuring that affected communities are fully informed of how to submit complaints. Notice boards will be placed at all work sites and laydown areas, displaying contact details of the Contractor's On-Site Supervisor and Grievance Focal Person.

7.1 Complaint Submission and Recording

Grievances may be submitted in person, by telephone, email, or written letter to the On-Site Supervisor or Project Manager.

All complaints must be recorded in a Complaint Register, containing:

- Date the complaint was received
- Name and contact details of the complainant
- Name and position of the person receiving the complaint
- Description of the issue raised
- Actions taken and follow-up measures
- Date of resolution and confirmation of closure

The Complaint Register will be made available to the STSP PMU Safeguards Team upon request.

7.2 A Grievance Redress Process

The grievance resolution process follows four sequential steps to ensure that all complaints are addressed promptly and fairly.

Step 1 – On-Site Resolution: The complainant may first raise the issue with the On-Site Supervisor, who will assess and attempt to resolve the matter immediately. If the grievance relates to land, it will be referred directly to the Project Manager for further handling. Minor issues such as dust, noise, or temporary access obstruction should be addressed on-site as soon as possible. Once resolved, the complaint is recorded and closed in the complaint register. However, if the issue cannot be resolved at this stage, it will be escalated to the STSP PMU/MISE for further review.

Step 2 – STSP PMU/MISE (within 2 weeks): At this stage, the STSP PMU/MISE reviews the complaint, investigates the issue, and coordinates with the Contractor and other relevant parties to identify and implement corrective measures. Land-related issues may again be referred to the Project Manager for clarification or resolution. If the issue is resolved, the case is closed and feedback is provided to the complainant. If not resolved within two weeks, the matter will be referred to the STSP Steering Committee for higher-level review.

Step 3 – STSP Steering Committee (within 2 months): The STSP Steering Committee serves as the final internal body for reviewing unresolved complaints referred by the PMU/MISE. The Committee is required to examine and decide on the grievance within two months. If the issue is resolved, it will be documented, and both the complainant and relevant stakeholders will be informed of the outcome. If the matter remains unresolved or the complainant is not satisfied with the decision, the grievance may be taken to the Magistrate Court.

Step 4 – Magistrate Court: If the complainant remains dissatisfied with the decision of the Steering Committee, the case may be submitted to the Magistrate Court for final adjudication. The Court's decision is final and binding on all parties involved.

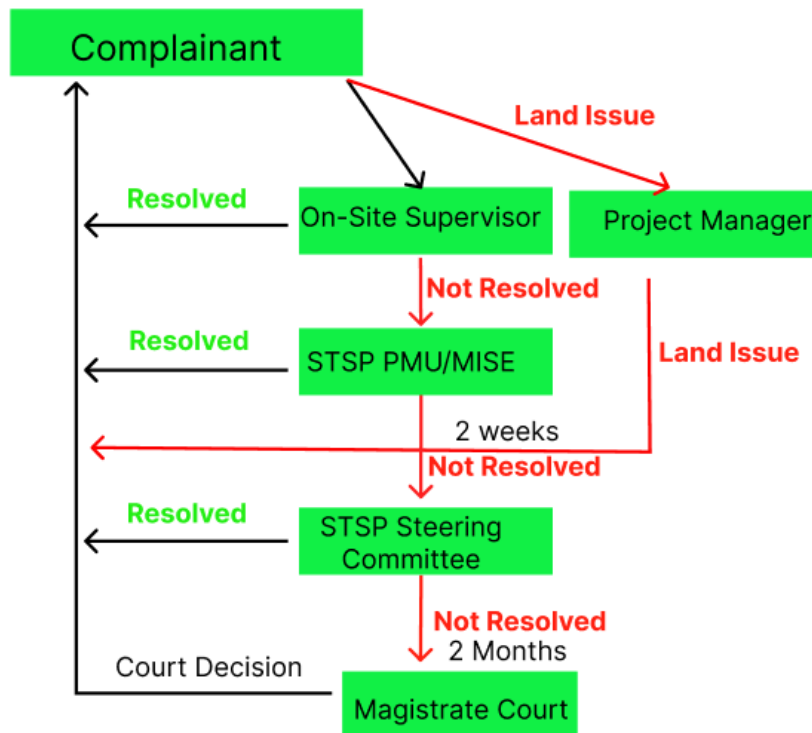


Figure 4. KHL Grievance Redress Mechanism

8. Design and implementation

The activities to be undertaken as part of this project include the following:

- Demolition works
- Earthworks – clearing of site for excavation and setting out
- Excavation works for water well and foundation
- Reinforcement works
- Concrete pour of foundation and slab for toilet
- Installation of concrete rings for well
- Foundation works for Tank stand
- Reinforcement and concrete pour for tank stand
- Waste pipe for new toilet
- Erecting of masonry wall for toilet and tank stand
- Roofing works for toilet
- Windows and door installation
- Blaster works for toilet

- Installation of inlet pipe and toilet appliances
- Pouring of slab for tank stand
- Pipe work for the water inlet from well
- Installation of wooden privacy wall
- Installation of solar pump and solar lights
- Finishing works.

The main project phases are outlined below, with a detailed construction work plan provided in Appendix 3:

- Procurement and Recruitment: 21 September 2027
- Construction Work: 14 Oct 2025 to 15 Oct 2027
- Testing and Commissioning: 20 Jan to 15 Oct 2027

Construction of the 30 toilets will be carried out in **six batches**, as outlined below:

- First batches – HT8, HT9, HT25, HT27
- Second batches – HT16, HT17, HT18, HT21, HT26
- Third batches – HT10, HT1, HT2, HT3
- Forth batches – HT4, HT5, HT6, HT20
- Fifth Batches – HT12, HT17, HT13, HT19
- Sixth batches – HT11, HT23, HT30, HT24, HT22

Screenshot of the Contruction Work plan (figure 4).

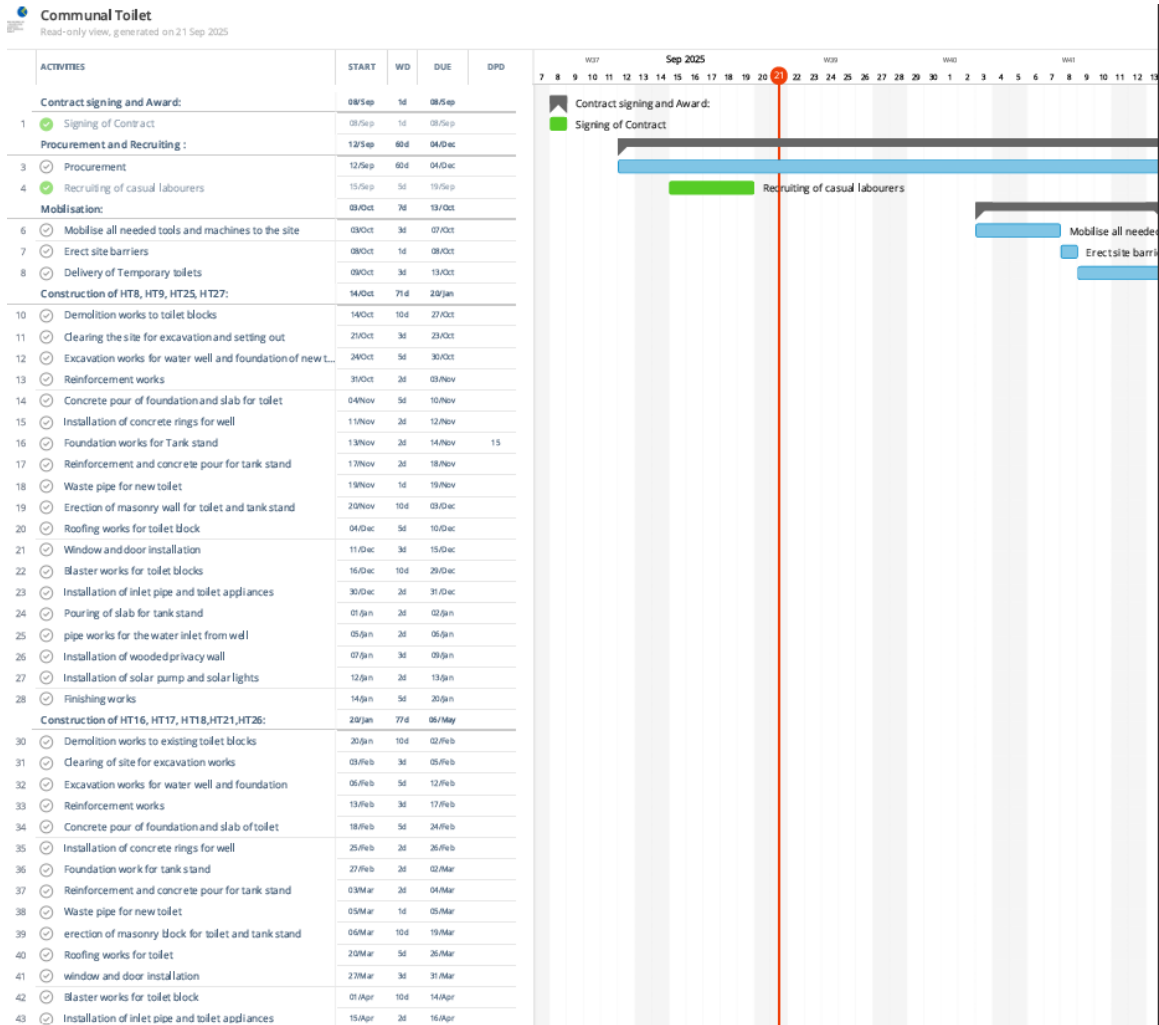


Figure 5. Construction Phase Work Activities and timeframe

All activities will be executed in accordance with the approved CESMP, Quality Management Plan, and Occupational Health and Safety Plan.

9. Environmental and Social risk identification and Analysis Methodology

The environmental and social risk classification for this project is assessed as MODERATE, based on the nature of anticipated impacts and urban context of the work. The analysis is based on the analysis of direct (primary) and indirect (secondary) impacts associated with construction and operation activities. The Area of Influence (AOI) has been divided into:

- Direct Impact Zone – the physical footprint of construction and immediate surroundings;

- Indirect Impact Zone – adjacent areas potentially affected by secondary impacts such as dust, noise, or runoff.

Risk analysis follows the matrix approach recommended by the United Nations Environment Programme (UNEP) and the Secretariat of the Pacific Regional Environment Programme (SPREP), adapted for World Bank ESS compliance and Kiribati's national regulatory procedures.

10. Potential Environmental, Social, Health and Safety Risk and Mitigation Measures

KHL is committed to completing the Project in a manner that safeguards the environment, workers, and local communities. To achieve this, the following supporting management plans have been developed and shall be implemented concurrently:

- Contractor's Environmental and Social Management Plan (CESMP) – this document;
- Stakeholder Engagement Plan (SEP); and
- Monitoring and Reporting Matrices linking project management systems to regulatory compliance.

The Environment and Social Risk (E&S) for this project is assessed as being Moderate, based on the manageable nature of anticipated impacts and urban context of the works. Mitigation measures have been developed to address key risk, including disruption of sanitation services, soil and water contamination, and occupational health and safety hazards. These measures have been this CESMP.

The E&S risks and mitigation measures associated for the pre-construction, construction, and post-construction phases are detailed in Table 4. These measures have been derived from the STSP ESIA and adapted for site-specific conditions.

The Project Manager shall ensure all mitigation measures remain current and effective throughout implementation. This CESMP is a living document, subject to periodic review and revision following any significant environmental or social incident, change in scope, or audit finding.

Key parameters Include:

Pre-Construction Phase

- Site delineation and footprint control
- UXO clearance

- Provision of temporary sanitation facilities

Construction Phase

- Soil erosion and contamination control
- Dust and emissions management
- Groundwater protection
- Vegetation and habitat management
- Utility and property protection
- Community health and safety
- Worker welfare and hygiene
- Asbestos and hazardous materials control
- Demolition waste management
- Surface runoff and drainage management

Table 3. Mitigation Measures

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
Pre-Construction and Design							
Footprint	<p>Slight increase in land coverage per toilet block due to inclusion of shower and disability units.</p> <p>Removal of trees that hinder construction work.</p> <p>Potential encroachment into neighboring spaces.</p>		<ul style="list-style-type: none"> • Inform nearby communities prior to construction regarding the footprint, work schedule, and potential disturbances. • Conduct community consultations to identify and agree on sites for temporary toilets and storage areas away from walkways. • Display contractor and grievance officer contact 	Contractor	<p>Consultation and awareness records</p> <p>Boundary and fencing installed</p> <p>Site map verified by MELAD (LMD)</p>	<p>Regular site inspections and consultation verification reports</p>	PMU / PIAC Safeguards Team

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
			<p>information clearly at each project site.</p> <ul style="list-style-type: none"> • Limit site clearing to the required footprint and use existing access routes where possible. • Avoid storage or work activities on private land adjacent to project sites. • Install temporary fencing or safety barriers around work areas prior to construction commencement. • Place visible signage in the local language indicating construction 				

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
			<p>zones and safety notices.</p> <ul style="list-style-type: none"> • Avoid tree cutting unless absolutely necessary for construction; any removed trees must be reported to PMU Safeguard for compensation. • Construct temporary bunds around excavated areas to contain runoff and prevent sediment flow. • Stabilize exposed soil with vegetation or topsoil cover after works. 				

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
			<ul style="list-style-type: none"> Install silt fences around soak-away pits where drainage slopes toward neighboring land. 				
Unexploded Ordnance (UXO)	Potential injury or death due to detonation of unexploded ordnance.	High	<ul style="list-style-type: none"> Conduct a UXO survey prior to any excavation or ground disturbance. 	Unexploded Ordnance (UXO)	Potential injury or death due to detonation of unexploded ordnance.	High	Conduct a UXO survey prior to any excavation or ground disturbance.
Temporary Toilets (for KHC Tenants)	Groundwater and soil contamination from poorly designed or managed portable toilets.		<ul style="list-style-type: none"> Temporary Toilets (for KHC Tenants) 	Groundwater and soil contamination from poorly designed or managed portable toilets.		Temporary Toilets (for KHC Tenants)	Groundwater and soil contamination from poorly designed or managed portable toilets.

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
Construction Phase							
Unexploded Ordnance (UXO)	Explosion causing injury or fatality	High	<ul style="list-style-type: none"> Stop work immediately if any suspicious object is found. Mark the area and evacuate all personnel. Notify relevant authorities and UXO specialists, including MELAD, Police, and PMU/PIAC. Implement UXO discovery and response protocols (Stop–Mark–Report–Wait). 	Contractor	Toolbox talk records, attendance sheets, incident reports	Site inspection and verification reports	PMU Safeguards Team, PIAC, and UXO Specialist Team

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
Temporary Toilets	<p>Risk of property damage or displacement of small structures to allow space for installation.</p> <p>Mismanagement by community members. Soil and groundwater contamination from leakage or improper sewerage connection.</p>	Medium	<ul style="list-style-type: none"> • Provide gender-segregated portable toilets connected to the PUB sewerage system to minimize exposure risks. • Ensure daily cleaning, disinfection, and regular maintenance of all sanitation facilities. • Conduct regular hygiene inspections to verify cleanliness and compliance. • Decommission temporary toilets upon completion of works in accordance with the 	Contractor	Site inspection reports	Monthly progress reports and verification visits	PIAC supported by PMU Safeguards Team

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
			<p>approved disconnection and reconnection management procedure.</p> <ul style="list-style-type: none"> Restore sites to their original or improved condition, ensuring no residual waste or contamination remains. 				
Soil Erosion	Surface runoff, sedimentation, and soil loss from exposed ground	Low	<ul style="list-style-type: none"> Preserve existing vegetation except where clearing is essential. Stockpile and reuse topsoil where possible. Stabilize and re-vegetate exposed surfaces after backfilling. 	Contractor	Site inspection reports	Weekly site inspections and monthly progress reports	PMU Safeguards Team

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
			<ul style="list-style-type: none"> Limit earthworks to the minimum area required Reuse excess spoil for beneficial purposes (e.g., filling potholes). Maintain natural drainage patterns; install controls to prevent runoff into adjacent areas. 				
Soil Contamination	Contamination from fuel, oil, sewage, or waste materials	Low	<ul style="list-style-type: none"> Prohibit fuel or hazardous material storage at worksites. Refuel equipment using mobile fuelling systems with spill kits on hand. 	Contractor	Site inspection reports, spill log	Weekly inspections and monthly reports	PMU Safeguards Team

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
			<ul style="list-style-type: none"> Inspect and maintain machinery daily to prevent leaks. Visually inspect for contaminated soil during demolition or excavation. Remove visibly contaminated soil and treat it as hazardous waste. Follow contaminated soil removal procedures as outlined in Section 11, Table 7.7. Engage PUB staff for safe sewer connection/disconnection as per Annex 7.8. 				

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
			Package and remove all used spill materials for off-island disposal at a licensed landfill.				
Air Emissions (Dust and Exhaust)	Dust emissions reducing air quality and causing community nuisance; vehicle emissions contributing to greenhouse gases	Medium	<ul style="list-style-type: none"> • Monitor and water down dusty areas as needed. • Limit vehicle speeds on-site. • Maintain vehicles and machinery according to manufacturer specifications. • Minimize exposure time of cleared or stockpiled areas by restoring them promptly after works. 	Contractor	Site inspection reports, maintenance logs	Weekly inspection and monthly reporting	PMU, PIAC, and Safeguards Team

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
Groundwater Quality	Contamination from improper installation of sewage infrastructure	Medium	<ul style="list-style-type: none"> Supervise sewage infrastructure installation to ensure proper sealing and alignment. Inspect connections and joints to minimize leakage risk. 	Contractor	Inspection records, connection tests	Weekly inspections and monthly reports	PMU, PIAC, and Safeguards Team
Terrestrial Biodiversity	Loss of vegetation and habitat	Low	<ul style="list-style-type: none"> Protect ground-level vegetation except where clearing is essential. Provide compensation for productive trees removed. Remove invasive species as part of site 	Contractor	Site inspection reports	Monthly progress reports	PMU Safeguards Team

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
			preparation and waste management.				
Utility Damage	Damage to existing underground or overhead utilities	Medium	<ul style="list-style-type: none"> Obtain utility plans from PUB and MISE prior to excavation. Consult landowners on informal service lines. Conduct hand-digging before using machinery to confirm utility locations. 	Contractor with MISE/PUB support	Site inspection and utility location records	Monthly verification and reports	PMU Safeguards Team
Property Damage	Damage to nearby structures during construction or machinery movement	Medium	<ul style="list-style-type: none"> Fence off structures at risk from construction activities 	Contractor with MISE/KHC support	Site visit and inspection reports	Monthly progress reports	Consultant supported by PMU/PIAC

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
			<ul style="list-style-type: none"> Reinstate relocated structures immediately after completion. 				
Occupational Health and Safety (OHS)	<p>Worker injury from equipment handling, excavation, or exposure to sewerage, working in confirm area inside trench of more than 1.5 meters and working Height posing risk to workers health and safety.</p> <p>Exposure to UXO, Asbestos, hazard material/substances.</p>	High	<ul style="list-style-type: none"> Conduct site-specific health and safety risk assessments. Develop and implement an OHS plan tailored to each site. OHS plan should outline safety procedures, responsibility, PPE requirement, and emergency arrangement. Display minimum/key safety procedures prominently at project 	Contractor	Inspection reports, incident logs, training records	Weekly inspections and monthly progress reports	PMU Safeguards Team

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
			<p>site and laydown area sign board.</p> <ul style="list-style-type: none"> • Provide regular safety training for all workers and maintain record of training and maintain attendance for all sessions. • Enforce PPE use (hard hats, boots, gloves, masks) when working on sewer pipes. • Fence the working area especially trench that are more than 1.5 meters depth. 				

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
			<ul style="list-style-type: none"> • Display safety signage in both English and Kiribati. • Ensure to provide a shelter and drinking for on-site personnel. • Allow excavation only after UXO clearance by specialists. • Ensure first aid kits are available on site. • Train workers in emergency response procedures. • Ensure compliance with national health and COVID-19 protocols. 				

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
			<ul style="list-style-type: none"> • Ensure all construction plant and vehicle operators are licensed and trained for specific machinery. • Maintain an incident register and investigate all cases. • Provide first aid facilities and trained personnel at each site. 				
Community Health and Safety	Health and safety risks to nearby residents; risk of SEA/SH; restricted access; public exposure to hazards	High	<ul style="list-style-type: none"> • Ensure compliance with national health and COVID-19 protocols. • Implement a Code of Conduct prohibiting 	Contractor and PMU Safeguards Team	Site inspection reports, GRM records, comm	Weekly inspection Monthly progress report	PMU Safeguard team

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
			<p>SEA/SH for all project staff.</p> <ul style="list-style-type: none"> • Raise community awareness on project risks and grievance channels. • Establish a specialized GRM for SEA/SH incidents. • Engage and inform the community on project timelines and safety measures. • Restrict public access using temporary fencing and signage. 				

E&S Aspect	Potential Impact / Risk	Risk Level	Management and Mitigation		Monitoring		
			Mitigation Measures	Responsibility	Parameters / Indicators	Frequency & Verification	Monitoring Responsibility
			<ul style="list-style-type: none"> • Install clear safety signage and barriers around active work areas. • Ensure public safety through regular notifications, public meetings, and on-site security staff. 				

11. Incident Response and Management

This section provides procedures for managing and reporting environmental, health, and safety (EHS) incidents and near misses during the implementation of the STSP. The objective is to ensure that all incidents are addressed promptly, investigated thoroughly, and corrective actions are implemented to prevent recurrence.

10.1 Objectives

- Ensure timely and effective response to incidents, emergencies, and near misses.
- Identify root causes and contributing factors to prevent recurrence.
- Maintain compliance with World Bank ESS2 and national Labor, health, and safety regulations.
- Strengthen the project's safety culture through transparent reporting and learning

10.2 Incident and Near Miss Reporting

All incidents resulting in injury, illness, property damage, environmental pollution, or potential community risk shall be promptly reported to the On-site Supervisor and Project Manager. Near misses—events that could have resulted in injury or damage but did not—must also be recorded and analysed.

Incidents and near misses shall be documented using the Accident and Incident Investigation Form (Annex 2). The On-site Supervisor and Foreman are responsible for initiating immediate investigation and completing the form.

The purpose of investigation is to:

- Determine direct, surface, and root causes of incidents;
- Identify corrective and preventive actions;
- Assign responsibility and implement disciplinary measures if appropriate; and
- Prevent recurrence on-site or in other project areas.

10.3 Incident Response Procedure

Immediate Response Actions

1. The injured person or first responder must report the incident to the Safety Officer or Site Supervisor immediately.

2. The Safety Officer records details in the Accident Logbook and confirms the facts with witnesses.
3. For cases requiring medical treatment, the injured person must be referred to the nearest medical facility without delay.
4. The Site Supervisor and employee representative will investigate the incident and complete the Accident Investigation Report.
5. The Project Manager reviews the findings and determines corrective and preventive measures.
6. The Site Manager implements control measures after consultation with project staff.
7. Serious incidents—including fatalities, major injuries, or environmental contamination—must be reported to the PMU Safeguards Team and MISE immediately by telephone, followed by a written report within seven (7) days.
8. The incident site must be secured and access restricted until investigations are complete.
9. All witnesses shall be interviewed, and any involved equipment or plant must remain untouched until authorized for use.

10.4 Investigation and Analysis

All accidents and near misses will be investigated using the Three-Level Causation Framework:

- a. Direct Cause: The immediate event or unsafe act leading to the incident.
- b. Surface Cause: Unsafe conditions, system weaknesses, or supervision issues.
- c. Root Cause: Underlying organizational, procedural, or behavioural deficiencies.

The Incident Investigation Template (Annex X) shall guide the investigation and documentation process. Reports will include factual findings, photographs, witness statements, and recommended corrective actions.

The Project Manager will ensure that findings are reviewed with the PMU Safeguards Team and communicated to all relevant staff. Lessons learned will be incorporated into future training and toolbox talks.

10.5 Immediate Action and Internal Notification

1. The first responder shall immediately notify the Project Manager of the incident.
2. The Project Manager shall assess whether the area remains hazardous. If so, evacuate all personnel and secure the site.

3. The Project Manager shall immediately inform the PMU Safeguards Team and PIAC.
4. If the injury is severe, the Project Manager will arrange for emergency medical assistance and ensure safe transportation to the nearest health facility.
5. All work in the affected area will remain suspended until investigations are completed and clearance is given.
6. The Project Manager shall coordinate with the PMU to ensure all required regulatory notifications are made to MELAD and relevant authorities.

10.6 Emergency Contact Information

Table 4. Emergency Contact Information

Agency / Organization	Position	Name	Contact Number
PMU – MISE	Deputy Project Manager	Areke Alexander	75021183
Contractor (KHL)	Project Manager	Uati Lotolua	TBD
Contractor (KHL)	On-site Supervisor	TBD	TBD
PIAC	Environmental and Social Specialist	TBD	TBD
Emergency Services	Kiribati Police / MHMS	–	993 / 992
MHMS	Ambulance	-	194

10.7 Non-compliance

All non-compliances, unsafe acts, and deviations from the CESMP must be reported immediately using the Non-Compliance and Corrective Action Register (Annex X).

Each non-compliance will be classified according to severity:

- **Minor:** Corrected during the inspection.
- **Moderate:** Requires documented corrective action within a specified timeframe.
- **Major:** Results in work stoppage or formal notice to the Contractor.

10.8 Incident Investigation Reports

All completed incident and near-miss reports shall be submitted to the PMU Safeguards Team within 48 hours of the incident. The PMU, with support from PIAC, will review and, where necessary, conduct independent verification or audit. Corrective and preventive actions will be tracked to closure.

See Appendix 2 for incident investigation report.

12. Environment Specific Environmental Measures

11.1 Waste Minimization

Construction activities under the STSP will generate various types of waste, including demolition debris, construction materials, and general domestic refuse. The objective of this Waste Management Plan is to ensure that all waste is minimized, segregated, stored, transported, and disposed of in a manner that prevents environmental contamination and aligns with national and international best practices.

Objectives:

- Ensure compliance with the Kribati Waste Management and Resource Recovery Strategy
- Comply with the Environment Act 2021 and associated MELAD (ECD) Waste Management guidelines
- Meet the World Bank Environmental, Health, and Safety Guideline for waste management
- Promote the principles of reduce, reuse, and recycle (3Rs) to minimize disposal volumes.

Waste Management Approach

KHL will implement the following measures to manage waste responsibly:

- Minimize waste generation at source through efficient material use and accurate quantity estimation
- Segregate waste stream at point of generation (e.g., recyclable, general and hazardous, organic).

- Reuse and recycle materials where feasible, and dispose of non-recyclable waste at approved landfills.
- Maintain clean and organised storage areas with signage and enclosed bins
- Avoid long-term on-site storage and large material stockpiles.

Table 5. Waste Management and disposal

Waste Type	On-site Management	Off-site Management / Disposal Options
General Waste	<ul style="list-style-type: none"> - Provide labelled and enclosed waste bins at the site office and work areas. - Store waste in accordance with the <i>Code of Practice</i> and MELAD regulations. - Avoid accumulation of waste and remove regularly to prevent Odors or pests. 	<ul style="list-style-type: none"> - Recyclable materials (plastic, cans, glass) to be sent to Kaoki Maange. - Non-recyclable waste to be disposed of at an approved municipal landfill.
Demolish wastes	<ul style="list-style-type: none"> - Store debris in a designated, contained area and cover to prevent dust emissions. - Segregate reusable materials (e.g., concrete, blocks, timber) for recovery or reuse) nicely on site. 	<ul style="list-style-type: none"> - Reuse inert materials (where approved) as infill for authorized seawall or landscaping works. - Dispose of remaining debris at MELAD-approved disposal sites. - reuse timber including off-cuts where possible or give it to workers to reuse them.
Domestic Waste	<ul style="list-style-type: none"> - Install clearly marked bins for food scraps and office waste. - Remove waste daily to avoid vermin attraction. 	<ul style="list-style-type: none"> - Transport to municipal waste collection system or MELAD-approved facility.

End of Life Vehicle	<ul style="list-style-type: none"> - Store separately in a safe area for recycling. - avoid long storage on Site. 	<ul style="list-style-type: none"> - Deliver to authorized scrap metal Kaoki Maange.
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11.2 Management of Hazardous Materials and Waste disposal procedure

Hazardous materials and waste generated under the STSP may result from the use, handling, and maintenance of fuels, lubricants, paints, solvents, and other construction-related chemicals. If not properly managed, these substances pose risks of soil and groundwater contamination, fire hazards, and adverse health impacts on workers and nearby communities. In addition to these typical construction-related materials, potential hazardous substances specific to the project include asbestos-containing materials from the demolition of old toilet structures, end-of-life vehicle (ELV) components such as used oil, batteries, and filters from machinery, unexploded ordnance (UXO) that may be present within the project area, and sewage or effluent leaks arising from disrepair of existing toilet facilities. Furthermore, piggery waste and human waste from surrounding communities may pose additional environmental health risks if not properly contained or managed. Effective identification, handling, storage, and disposal of these hazardous materials are therefore essential to ensure environmental protection and occupational safety throughout project implementation.

Objectives

- Ensure safe handling, storage, and disposal of hazardous substances in accordance with the MELAD (ECD) regulations and guidelines and World Bank EHS Guideline.
- Prevent accidental releases that may harm people, property, or the environment
- Minimize exposure risk to hazardous substances through proper training, supervision, and use of personal protective equipment (PPE)
- Maintain a complete and up-to-date Material Safety Data Sheet (MSDS) register for all hazardous material used on-site.
- Promote a culture of safety and environmental responsibility by ensuring that all personnel understand and comply with hazardous materials management procedures.

Management Measures

Table 6. Hazardous Materials and Waste Management - Objective and measures

Objective	Measures
<p>Ensure all site personnel, contractors, and subcontractors understand their responsibilities in managing hazardous materials, fuels, and responding to spills.</p>	<ul style="list-style-type: none"> - Provide induction and periodic refresher training on hazardous material handling and emergency response. - Display spill management procedures prominently at all storage and refueling areas. - Maintain adequate spill response equipment on-site and ensure personnel are trained in its use.
<p>Minimize the likelihood of spills or leaks from fuel and chemical storage or handling activities.</p>	<ul style="list-style-type: none"> - Conduct refueling only within designated, bunded areas. - Use drip trays beneath all stationary plant, generators, and fuel drums. - Inspect fuel lines, tanks, and fittings regularly and replace damaged components immediately.
<p>Ensure the safe and compliant disposal of hazardous substances and chemicals.</p>	<ul style="list-style-type: none"> - Dispose of all hazardous materials in accordance with their Material Safety Data Sheets (MSDS). - Transport and dispose of hazardous waste only at MELAD (ECD)-approved hazardous waste facilities, such as the Nanikai Landfill. - Maintain waste transfer records for audit purposes.
<p>Manage and dispose of contaminated waste materials, including soil, sewage, and piggery waste, in an environmentally responsible manner.</p>	<ul style="list-style-type: none"> - Collect and store contaminated materials in sealed, labeled containers. - Dispose of contaminated waste at MELAD-designated facilities in compliance with the Environment Act 2021.

	<ul style="list-style-type: none"> - Document all waste handling and disposal activities in a dedicated register.
Ensure effective and timely response to environmental emergencies and spills.	<ul style="list-style-type: none"> - Implement the Emergency and Spill Response Plan (Section 6) in the event of a spill or release. - Conduct routine emergency response drills and update the plan as necessary. - Display emergency contact information at all work and storage areas.
Maintain safe storage and labeling of all chemicals and hazardous materials.	<ul style="list-style-type: none"> - Store hazardous substances in secure, well-ventilated, and banded areas with appropriate shelving and signage. - Label all containers clearly with product name, hazard classification, and handling precautions. - Keep updated MSDS copies at all relevant locations (project site, laydown area, and site office).
Ensure effective communication and reporting of incidents.	<ul style="list-style-type: none"> - Immediately report any spills, leaks, or damage involving hazardous materials to the PMU Safeguards Team and relevant authorities. - Ensure MSDS and emergency procedures are accessible to all personnel and available upon request. - Maintain a Hazardous Materials Register and log all incidents, corrective actions, and follow-up activities.
Conduct maintenance and cleaning of machinery and equipment in an environmentally sound manner.	<ul style="list-style-type: none"> - Use only designated wash-down areas within the laydown yard or project compound. - Prevent washing or draining near

	<p>watercourses or storm drains.</p> <ul style="list-style-type: none"> - Dispose of wash water and residues in compliance with MELAD and PMU requirements. project site) when produce when ask by authorities or when ask.
<p>Minimize emissions and environmental impacts associated with plant and machinery operations.</p>	<ul style="list-style-type: none"> - Maintain all machinery and vehicles in good working order and in accordance with manufacturer specifications. - Perform regular inspections to identify leaks or exhaust issues. - Replace or repair defective equipment promptly to avoid contamination or air pollution.

11.3 Demolition Management Procedure

The Demolition Management Procedure sets out the approach and requirements for the safe and environmentally sound removal of existing communal toilet structures and associated infrastructure under the STSP. The procedure ensures that all demolition activities are planned, supervised, and executed in a manner that safeguards worker health and safety, prevents adverse environmental impacts, and minimizes disturbance to nearby communities.

This procedure forms part of the Contractor’s Construction Environmental and Social Management Plan (CESMP) and is designed to align with the Environment Act 2021, MELAD (ECD) requirements, and the World Bank Environmental, Health and Safety (EHS) Guidelines. It outlines a systematic process covering pre-demolition preparation, hazardous material identification and removal, controlled demolition methods, waste management, occupational health and safety protocols, and post-demolition restoration.

Implementation of this procedure ensures that demolition works are conducted in a controlled and compliant manner—from initial hazard assessment and service isolation through to waste disposal and final site clearance. The approach emphasizes risk prevention, proper handling and disposal of hazardous materials such as asbestos, and continuous monitoring of environmental

performance. Ultimately, this procedure supports the Project's broader objective of delivering safe, sustainable, and resilient sanitation infrastructure for the people of South Tarawa.

See Annex 6 for Demolition Management Procedure.

11.4 Sewerage Dis-connection and reconnection procedures

The Procedure for Disconnection and Reconnection of Sewage Pipes provide guidance for the safe and environmentally responsible management of sewage infrastructure during the construction of communal toilet facilities under the STSP. The procedure ensures that all sewage pipe disconnection and reconnection activities are undertaken solely by the Public Utilities Board (PUB)—the mandated authority for wastewater operations in Kiribati—to prevent leaks, protect groundwater resources, and safeguard public health.

This procedure forms part of the Contractor's Construction Environmental and Social Management Plan (CESMP) and integrates environmental, social, and occupational health and safety safeguards into each stage of the works. It outlines the coordination process between the Contractor (KHL), PUB, and the Project Management Unit (PMU), defining clear roles and responsibilities to ensure compliance with national regulations, the Environment Act 2021, and the World Bank Environmental and Social Standards (ESS2 and ESS4).

Key components of this procedure include:

- Pre-construction planning and coordination with PUB for scheduling and site access;
- Risk assessment and site preparation to prevent sewage leaks or contamination;
- Implementation of health and safety measures for all contractor workers, including PPE use, training, and exclusion zones;
- Environmental protection measures to prevent groundwater pollution and minimize community impacts;
- Post-reconnection monitoring to verify system integrity and confirm no leakage or contamination; and
- Reporting and documentation within the CESMP, ensuring traceability and accountability for all sewage-related activities.

Through this procedure, KHL commits to ensuring that all works involving sewage systems are carried out in full coordination with PUB, maintaining the highest standards of environmental protection, occupational health and safety, and community well-being.

See Annex 7 for Sewerage Dis-connection and Reconnection procedures.

13. Monitoring and Reporting

Environmental and social monitoring will be conducted throughout all phases of the Project to ensure mitigation measures are effective and compliance is maintained with Kiribati legislation, the STSP ESIA, and World Bank Environmental and Social Standards.

The Contractor is responsible for day-to-day monitoring of site-level Environmental, Social, Health, and Safety (ESHS) measures in accordance with the CESMP. This includes:

- Conducting routine site inspections;
- Maintaining monitoring records;
- Preparing monthly reports; and
- Submitting documentation to the PMU Safeguards Team for review.

The PMU Safeguards Team (MISE) will conduct regular oversight, including weekly site inspections and quarterly compliance audits. The PIAC will provide independent technical support and verification of contractor performance, ensuring alignment with ESIA and ESS requirements.

The MISE, as the Implementing Agency, retains overall responsibility for ensuring ESHS compliance and will coordinate with the World Bank, PMU, and the Contractor to ensure safeguard commitments are met.

Complaints received through the Grievance Redress Mechanism (GRM) will be tracked, verified, and resolved in a timely manner. Where necessary, additional monitoring visits will be scheduled.

12.2 Reporting

The Contractor will prepare and submit Monthly CESMP Implementation Reports to the PMU. Reports will describe:

- Progress of mitigation measures;
- Monitoring results and findings;
- Non-compliance and corrective actions taken; and
- Community feedback or grievances received.

The PMU and PIAC will review the reports and issue comments or recommendations for continuous improvement.

Key Environmental Monitoring Parameters

- Soil erosion and sediment control
- Soil and water contamination
- Dust and air emissions
- Groundwater quality
- Waste management and disposal
- Noise and vibration
- Utility protection and restoration
- Worker health, hygiene, and safety
- Asbestos handling and disposal
- Community health and safety
- Surface runoff and drainage management

Frequency:

- **Daily:** Site-level inspections by Contractor
- **Weekly:** PMU and PIAC oversight visits
- **Monthly:** Consolidated CESMP reports
- **Quarterly:** Safeguard performance reviews

Audit findings and corrective actions will be communicated to all site staff. The Project Manager and Safeguard Officer shall ensure lessons learned are incorporated into ongoing training and toolbox talks.

12.1 Monitoring

The Environmental monitoring will be carried through all phases of the project to ensure that environmental mitigation measures are effective and that actual environmental impact accord with the predicted impacts and comply with the Kiribati legislation, World Bank safeguards. The Environmental monitoring plan is presented below and outlines the parameters, frequency, and responsibility for monitoring.

The Contractor is responsible for implementation and monitoring day-to-day environmental, social, health and safety measures on sites. The contractor must adhere to the approved CESMP, ensuring that all activities comply with the ESIA requirements and relevant national regulations world bank safeguard requirement. This includes conducting regular site inspections, maintaining accurate records of environmental and social performance, and submitting periodic reports to the

Project Management Unit (PMU) for review. Through these actions, the Contractor ensures that construction activities are carried out safely, responsibly, and in line with environmental and social safeguard commitments.

The PMU Safeguards Team under MISE is responsible for overseeing and supervising the contractor's Environmental, Social, Health, and Safety (ESHS) performance. The team conducts weekly site inspections and audits to verify that mitigation measures are effectively implemented in line with the ESIA and C-ESMP. It also reviews the contractor's monitoring reports, assesses compliance, and recommends corrective actions where necessary to ensure continuous improvement in environmental and social performance.

The Project Implementation Assistance Consultant (PIAC) provides independent support to the PMU through regular environmental and social monitoring of construction activities. PIAC ensures that all project works comply with the World Bank Environmental and Social Standards (ESS) and the requirements outlined in the ESIA. The consultant also prepares comprehensive monthly and quarterly safeguard monitoring reports that summarize site conditions, compliance status, and any issues identified, providing recommendations to improve overall environmental and social performance.

The MISE, as the project Implementing Agency, holds overall responsibility for ensuring environmental and social compliance throughout the project. MISE coordinates closely with the World Bank, and the PMU, and the contractor to ensure that all safeguard commitments outlined in the ESIA and the project agreements are properly implemented and maintained.

The STSP PMU will ensure appropriate monitoring is undertaken during the construction in accordance with project progress. Complaints received will be monitored and resolved in accordance with GRM. If required, additional monitoring inspection will be undertaken.

12.2 Reporting

The Contractor will prepare monthly reports which will describe the implementation of the CESMP including any non-compliance and corrective actions. The report will be submitted, reviewed and approved by the PMU.

Regular environmental inspections will focus on the following key areas:

- Soil erosion
- Soil contamination

- Emissions including dust and air monitoring from machineries, equipment and construction works and operation
- Groundwater for signs of any leak and overflow
- Terrestrial biodiversity
- Utility Damage
- Proper damage
- Community health and Safety
- Working conditions
- Hygiene practices
- Asbestos Worker OHS Community safety
- Demolishing of communal toilet – proper waste management
- Surface Run-off

The environmental and social audit will be undertaken on a weekly basis which is one way to identify areas for improvement. Audit results and report will be communicated to contractor staff and actions undertaken to correct them are recorded.

The Contractor Project Manager and Safeguard Officer are responsible for ensuring environmental and social inspection are undertaken. Project Manager and On-Site Supervisor will carry out EHS walks focusing on top risk to demonstrate leadership commitment to EHS.

14. Budget and Resource Allocation

This will be updated once I got revised one.

PRICED ACTIVITY SCHEDULE						
City: Betio						
Name of Project	1st Package Communal Toilet Rehabilitation, ref. KI-MISE-466547-CW-RFQ.					
Bidder's name	KING HOLDINGS LIMITED		All price are in USD			
No.	Description of item (1)	Qty (2)	Unit (3)	Price/Unit (4)	Price for Item (5)	

1	Communal Toilet HT 8, HT 9, HT 25, HT 27: Remove and dispose all material of existing Four (4) Cubical communal toilet - Prepare the site and construct according to standard drawings and notes five (5) Cubical new structure - Flush: Establish a new borehole and pump system with a 3,000 l header tank, connected to the flushing cisterns (1 to 15 m maximum from building) - Shower - Hand wash: hand washing - Connect to shower basin.	4 (Four)	Each	18,442.49	73,769.94
2	Communal Toilets HT 16, HT 17, HT18, HT 21, HT 26: Remove and dispose all material of existing Five Cubical communal toilet - Prepare the site and construct according to standard drawings and notes Six (6) Cubical new structure - Flush: Establish a new borehole and pump system with a 3,000 l header tank, connected to the flushing cisterns (1 to 15 m maximum from building) - Shower - Hand wash:	5 (FIVE)	Each	20,287.83	101,439.15
3	Communal Toilets HT 10 Remove and dispose all material of existing Five Cubical communal toilet - Prepare the site and construct according to standard drawings and notes Six (6) Cubical new structure - Flush: Establish a new borehole and pump system with a 3,000 l header tank, connected to the flushing cisterns (1 to 15 m maximum from building) - Shower - Hand wash: Remove One Tree	1 (One)	Each	20,452.79	20,452.79

No.	Description of item (1)	Qty (2)	Unit (3)	Price/Unit (4)	Price for Item (5)
4	Communal Toilet HT 1, HT 2, HT 3 Remove and dispose all material of existing Six Cubical communal toilet - Prepare the site and construct according to standard drawings and notes Seven (7) Cubical new structure - Flush: Establish a new borehole and pump system with a 3,000 l header tank, connected to the flushing cisterns (1 to 15 m maximum from building) - Shower - Hand wash:	Three (3)	Each	22,694.60	68,083.80

5	Communal Toilet HT 4, HT 5, HT6 , HT 20 Remove and dispose all material of existing Six Cubical communal toilet - Prepare the site and construct according to standard drawings and notes Seven (7) Cubical new structure - Flush: Establish a new borehole and pump system with a 3,000 l header tank, connected to the flushing cisterns (1 to 15 m maximum from building) - Shower - Hand wash: Remove One Tree	4 (Four)	Each	22,863.61	91,454.43
6	Communal Toilet HT 12 Remove and dispose all material of existing Six Cubical communal toilet - Prepare the site and construct according to standard drawings and notes Seven (7) Cubical new structure - Flush: Establish a new borehole and pump system with a 3,000 l header tank, connected to the flushing cisterns (1 to 15 m maximum from building) - Shower - Hand wash: : Remove One Banana Tree (to 10 Prongs)	1 (one)	Each	23,614.88	23,614.88

No.	Description of item (1)	Qty (2)	Unit (3)	Price/Unit (4)	Price for Item (5)
7	Communal Toilet HT 14, HT 15, HT 28, HT 29 Remove and dispose all material of existing Seven Cubical communal toilet - Prepare the site and construct according to standard drawings and notes Eight (8) Cubical new structure - Flush: Establish a new borehole and pump system with a 3,000 l header tank, connected to the flushing cisterns (1 to 15 m maximum from building) - Shower - Hand wash:	4 (Four)	Each	24,928.77	99,715.09
8	Communal Toilet HT 7, HT 13, HT 19 Remove and dispose all material of existing Eight Cubical communal toilet - Prepare the site and construct according to standard drawings and notes for TWO BACK TO BACK Five Cubical Units / Cubical new structure - Flush: Establish a new borehole and pump system with a 3,000 l header tank, connected to the flushing cisterns (1 to 15 m maximum from building) - Shower - Hand wash:	3 (three)	Each	29,780.88	89,342.65

9	Communal Toilet HT 11 Remove and dispose all material of existing Eight Cubical communal toilet - Prepare the site and construct according to standard drawings and notes for TWO BACK TO BACK Five Cubical Units / Cubical new structure - Flush: Establish a new borehole and pump system with a 3,000 l header tank, connected to the flushing cisterns (1 to 15 m maximum from building) - Shower - Hand wash: Remove One Tree	1 (one)	Each	34,101.17	34,101.17
No.	Description of item (1)	Qty (2)	Unit (3)	Price/Unit (4)	Price for Item (5)
10	Communal Toilet HT 23, HT 30 Remove and dispose all material of existing Ten Cubical communal toilet - Prepare the site and construct according to standard drawings and notes for TWO BACK TO BACK Six Cubical Units / Cubical new structure - Flush: Establish a new borehole and pump system with a 3,000 l header tank, connected to the flushing cisterns (1 to 15 m maximum from building) - Shower - Hand wash:	Two (2)	Each	35,160.91	70,321.83
11	Communal Toilet HT 24 Remove and dispose all material of existing Ten Cubical communal toilet - Prepare the site and construct according to standard drawings and notes for TWO BACK TO BACK Six Cubical Units / Cubical new structure - Flush: Establish a new borehole and pump system with a 3,000 l header tank, connected to the flushing cisterns (1 to 15 m maximum from building) - Shower - Hand wash: Remove One Tree	1 (one)	Each	38,425.36	38,425.36

12	Communal Toilet HT 22 Remove and dispose all material of existing Twelve Cubical communal toilet - Prepare the site and construct according to standard drawings and notes for TWO BACK TO BACK Seven Cubical Units / Cubical new structure - Flush: Establish a new borehole and pump system with a 3,000 l header tank, connected to the flushing cisterns (1 to 15 m maximum from building) - Shower - Hand wash: Remove One Tree	1 (one)	Each	42,749.55	42,749.55
No.	Description of item (1)	Qty (2)	Unit (3)	Price/Unit (4) USD	Price for Item (5) USD
13	PRICE ONLY Contingency (Provisional) Price to supply and install additional 10 Square meter of 100 mm deep by 2.0 m wide, 5 m long path (Being beyond the 40 Square m included in the price as per the specification)	1	Unit of 10 SqM (Unit Price)	537.80	537.80
14	Price Only Contingence (Provisional) Price to remove and dispose One tree	1	Each	85	85
15	Price Only Contingence (Provisional) Price to remove and dispose Banana Tree with up to 10 Prongs (branches)	1	Each	85	85

16	Price Only Contingency (Provisional) Price to connect a Borehole to the support structure and Tank additional Pipe only (Install units of 5 lin m) (beyond the 15 lin M allowed for in the specification) 25 mm PVC pipe (Buried)	1	(length of 5 M)	150	150
17	Price Only Contingency (Provisional) Price to construct additional 500 mm length (depth) of Borehole (Outer concrete casing, Fill material, Inner 150 PVC pipe, 25 PVC pipe , Excavation and site tidy, beyond the dimensions shown on drawing B01	1	Additional length (depth) on 500 mm	225	225
18	Price Only Contingency Provision Price to Retro fit a an existing Borehole with a pump system matching B0-1			225	225
19	Price only of Bore hole construction to 2m deep			327	327
21	CONTINGENCY			USD	76,020.41

22	Allow for Environmental and Health plan and inspection ESIA			USD	130,000.00
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23	Allow for UXO and Asbestos survey			USD	45,000.00
	TOTAL			USD	1,004,491.05

15. Annex

Annex 1. Waste Management Plan

Annex 2. Occupational Health and Safety Plan

Annex 3. Cultural Heritage Management Plan

Annex 4. Emergency Response Plan

Annex 5. Labor Management Procedure

Annex 6. Demolition Management Procedure

Annex 7. Sewerage Dis-connection and Reconnection Procedure

Appendix 1. Environmental Audit Report Template

Project		Contract	
Reporting Officer		Date	
Personnel Interviewed		Document reviewed	
Item #	Key Findings	Type	
No-conformance OBS = Observation (positive/negative) OI = opportunity for improvement			

Appendix 2. Environmental Incident Report Template

Project:		
Contract:		
Incident #		
Date		
Reporting Officer		
Brief Summary		
Agencies and Authorities Notified		
Agency Name	Person Notified	Time of Notification/Method of communication

Response Action	Time Action taken
What is cause	
Number #	Cause factor
Environmental effects of incident	
Number #	Environment Effect
Measures implement to mitigate the effects of incident	
Number #	Mitigation measure
Measure to put in place to prevent similar incident from occurring in future	
Number #	Prevention Measures
