

VERSION 6

September 2025

ANNEX 6

ENVIRONMENTAL AND SOCIAL SAFEGUARDS ASSESSMENT AND ACTION PLAN

**DIRECT FINANCING FOR COMMUNITIES
AND BUSINESSES TO RESPOND TO
CLIMATE CHANGE IN THE COOK
ISLANDS**

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ABBREVIATIONS

AE	Accredited entity
AF	Adaptation Fund
AR6	Sixth Assessment Report of the IPCC
BCI	Bank of Cook Islands
CC&HAP	Climate Change & Health Adaptation Plan
CIIC	Cook Islands Investment Corporation
CSHR	Climate sensitive health risk
COVID-19	Coronavirus disease 2019
EEZ	Exclusive economic zone
EMCI	Emergency Management Cook Islands
FP	Funding proposal
GAP	Gender Action Plan

GCF	Green Climate Fund
HIU	Health intelligence unit
ICI	Infrastructure Cook Islands
INTAFF	Ministry of Internal Affairs
IRMF	Integrated Results Management Framework
MFEM	Ministry of Finance and Economic Management
MOA	Ministry of Agriculture
NES	National Environment Service
NGO	Non-government organisation
NSDA 2020+	National Sustainable Development Agenda, Te Ara Akapapa'anga Nui
Pa Enua	Outer Islands
PPF	Project Preparation Facility
PTI	Punanga Turuturu Itivaine
SAP	Simplified Approval Process
SEAH	Sexual exploitation, abuse and harassment
SLR	Sea-level rise
SPCZ	South Pacific Convergence Zone
SRIC-CC	Strengthening the Resilience of our Islands and our Communities to Climate Change
SP	Sub-project
TMO	Ministry of Health, Te Marae Ora
TVP	Tarai Vaka process, government project management system
WHO	World Health Organisation

A. INTRODUCTION

1. The Environmental and Social Safeguards (ESS) and the Environmental and Social Action Plan (ESAP) Annex 6 is a supporting document for the design of the GCF Funding Proposal: Enhanced Direct Financing (EDA) for communities and businesses to respond to climate change in the Cook Islands.
2. To support implementation of this EDA Funding Proposal a risk assessment addressing social and environmental risks is needed to ensure that livelihoods and the environment are safe guarded from potential negative impacts. The GCF environmental and social screening checklist has been completed and is provided as **Appendix 1** of this Annex 6.
3. The ESAP was prepared to comply and align with the Ministry of Finance and Economic Management (MFEM) ESS requirements (**Appendix 2**) and GCF's Revised Environmental and Social Policy, updated Gender Policy, and Indigenous Peoples Policy and identify which components have been triggered in the preparation of the ESAP.
4. This EDA Facility is Category C (no or low risk. This EDA project is proposing to finance micro/small-scale adaptation activities such as re-roofing and upgrading building works, roof tiedowns, water catchment and sanitation system upgrades for households, small businesses and community organisation buildings.
5. All EDA Sub-projects will have additional ESS screening and due diligence when the EDA Fund Sub-Project Application Form is being completed. This ESS screening will be supported by Cook Islands National Environment Service Staff on Island and where necessary Central office staff as well
6. It is the responsibility of MFEM as the Accredited Entity (AE) and Executing Entity (EE) to ensure that the requirements of the ESS and ESAP are integrated into the project during the planning and execution of individual and community level activities. It specifies the procedures, activities and institutional mechanisms to be used during implementation of the EDA Sub-project implementation. It is the AE's responsibility to ensure that proper ESS processes and reporting is in place to ensure the project is delivered with minimal or no negative environmental or social impact.
7. A Stakeholder Engagement Plan is provided in the Feasibility Study Chapter 12 which is prepared to further enhance and enrich the collaboration efforts of all stakeholders including Government Agencies, traditional and community leaders, NGO's and general population who will participate in EDA sub-project activities, having already been engaged at the design stage of the EDA.

Geography

8. The Cook Islands are an archipelago of 15 major islands between 14 °S to 22 °S latitude and 170 °W to 155 °W longitude in the western Pacific Ocean. The northern group of islands lies to the north of the South Pacific Convergence Zone (SPCZ), the southern group lies to the south of the SPCZ Both sub regions of the Cook Islands have a wet season from November to April and dry season from

May to October¹. Twelve islands of are inhabited across an Exclusive Economic Zone (EEZ) of nearly two million square kilometres. The country is geographically divided into the main island of Rarotonga, which is the administrative centre and seven other southern group islands (Aitutaki, Manuae, Takutea, Atiu, Mitiaro, Mauke, Mangaia) which are primarily volcanic islands and the low coral atolls in the Northern group (Palmerston, Suwarrow, Nassau, Pukapuka, Rakahanga, Manihiki and Penrhyn). They are also known as the Pa Enua or Outer Islands. The two island groups are markedly different in their social, cultural and economic activities. The Northern Pa Enua remains relatively isolated from the Southern Pa Enua with infrequent and expensive transportation links.

9. The Cook Islands is a vulnerable small island state as identified by the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6) and more specifically will require long term planning as global warming of 1.5°C to 2°C will be exceeded during the 21st century unless deep reductions in carbon dioxide (CO₂) and other greenhouse gas emissions occur in the coming decades. Relative sea level rise (SLR) continues to be a major threat since it can exacerbate the impacts of other climate hazards on low-lying coastal communities and infrastructure, ecosystems, and freshwater resources in particular the northern group islands. Marine heatwaves (MHW) will increase around all small island nations and are projected to be more intense and prolonged. Higher evapotranspiration under a warming climate is projected to partially offset future increases or amplify future reductions in rainfall resulting in drier conditions and increased water stress in the small islands.
10. A key criterion for EDA grant funding will be the location of the building or home in determining the level of risk during extreme weather events (EWE). Infrastructure Cook Islands (ICI) is updating island geolocation profiles that will provide key geospatial layers more user-friendly and accessible to both internal users and the public. This includes refining how elevation, hazard, building and infrastructure data are visualized and used in practical applications in order to understand risks and building requirements for long term resilience. However, this is still in the development stages and unlikely available for EDA sub-project risk screening. The Feasibility Study (FS) provides further detail of the work currently undertaken in the Cook Islands by Government Agencies that will work collaboratively with EDA managers where possible to assess risk in sensitive areas.

Demographics

11. The 2021 Census has the resident population of the Cook Islands at 15,040. Twelve of the 15 islands of the Cook Islands are inhabited and, with the exception of Rarotonga and Aitutaki, the other ten

¹ 'NextGen' Projections for the Western Tropical Pacific: Current and Future Climate for Cook Islands Technical Report CSIRO and SPREP October 2021

islands have communities of less than 500 people. Key findings of Census 2021 are provided in Figure 1 below.

12. The capital of Avarua is on the main island of Rarotonga which holds more than 70% of the resident population (10,898) and is the site of the major international airport and harbour. Rarotonga is also the administrative centre and the location for the main offices of all the Cook Islands Public Service Ministries and State-Owned Enterprises. The Southern Group Islands have 20% while Northern Group Islands share the remaining 7% of the population. The total population has been in decline since the early 1970s, with a dramatic decline in 1996 as a result of the substantial reduction in the public service in 1996/97.

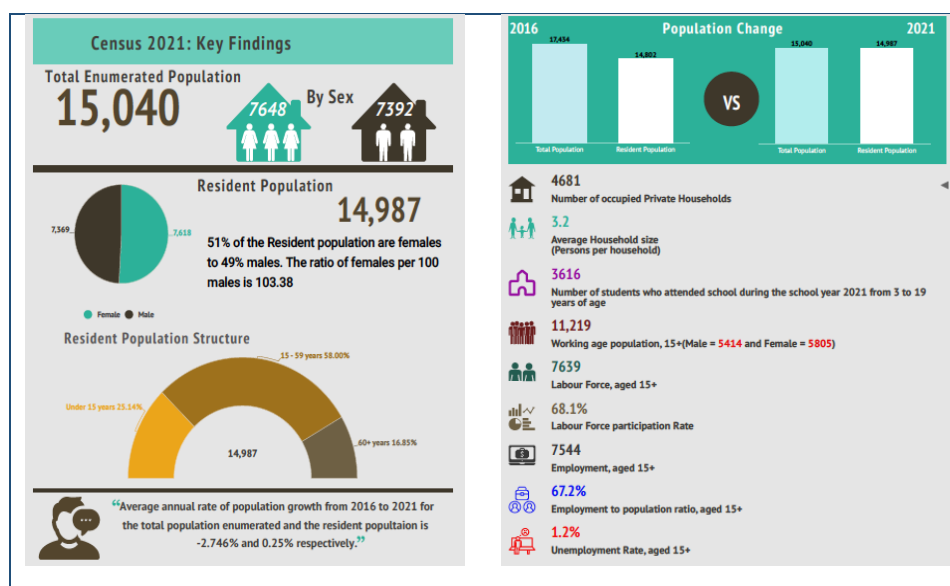


Figure 1 Findings of 2021 Census

13. The Cook Islands population structure is characterised by two distinct features. The first is that the 0-4 age group is smaller than the 5-9 group, which suggests a decline in fertility and/or greater emigration of young families from the Cook Islands. The second is a significant decline in the 15-19 age group, which were the 10-14 cohort at the Census in 2011. The likely explanation for this is that young Cook Islanders have completed secondary education and travelled overseas for further education or employment opportunities. This number has improved over the last 10 years with more students aged 15 – 19 taking advantage of tertiary training on island with either Cook Islands Tertiary Training Institute (CITTI), or University of the South Pacific (USP).
14. As New Zealand passport holders, Cook Islanders can move freely to and from New Zealand, and this option is exercised regularly by families looking for employment opportunities as well as seeking better health care services. The declining population is a critical development challenge for the Cook Islands, affecting all sectors and particularly in the Pa Enua. Depopulation, especially the younger generations leaving the Cook Islands, has led to a shortage of skilled workers and increasing

reliance on foreign workers. The social and economic development disparities between Rarotonga and the Pa Enua have caused emigration from the Pa Enua to Rarotonga. For the Cook Islands, climate change is another critical issue requiring coordinated policy response from the public sector and civil society to strengthen resilience to climate change, address the mitigation and adaptation measures, food security and sea level rise in the longer term. A co-benefit that has been identified as an outcome is that the EDA Facility will support NSDA2020+ Goal 14 – A sustainable population. The identified sub-projects will incentivise the population and will reduce out-migration from the Pa Enua and Rarotonga thereby supporting resident population numbers. Homeowners and their homes are considered family buildings making any improvements intergenerational – they will benefit future family members.

Economy

15. Tourism is the country's leading source of revenue account representing around 60% of GDP. It plays a vital role in correcting the balance of payments and is a long-term opportunity. Strong growth in tourism in recent years has seen the Cook Islands experience economic growth and progression towards higher levels of economic prosperity. However, the strong economic growth and heavy reliance on the tourism sector means the Cook Islands remains extremely vulnerable to shocks in external markets and natural disasters. If a major tropical cyclone were to hit Rarotonga, it would take time before the tourism industry and the entire country could rebuild as noted in the COVID-19 pandemic where economic activity came to a halt for nearly two years.
16. Cook Islands has a well-developed private sector on Rarotonga and Aitutaki, mostly based around tourism related businesses. EDA Fund will support small business owners who will be able to access grant funding and reimbursable grants as well.
17. Income generation on the remaining islands is predominantly from central and local government jobs with agriculture showing signs of resurgence since COVID-19 lockdowns as well as strong tourism numbers. The country currently gains income from vessels licensed to fish inside the EEZ and from planes that fly through Cook Islands airspace above. The potential for seabed minerals is also being assessed and exploration licenses were offered through a robust licensing process in 2020/2021

Indigenous Peoples

18. The Cook Islands Immigration Act 2021 defines a Cook Islander – Section 21 as “A person who is part of the Māori Race indigenous to the Cook Islands.”
19. The MFEM Environmental and Social Safeguard Framework – ESS Standard 7 – also refers to Indigenous peoples and traditional local communities as “tangata enua or people with blood ties to any of the islands in the Cook Islands. The above definitions are the closest we have in classifying

people as ‘indigenous people’. There are no separate laws for people of Cook Island decent and other ethnic groups. The funding proposal has been designed so that all people in their various ethnic groups are identified and recognised at inception phase.

20. The law of the country applies to everyone in the country whether they are resident or visitor.
21. Appendix 1 of this Report includes the GCF Environmental and Social Safeguards Screening Checklist that states “Under [*the UN working definition of indigenous peoples*](#), no differentiable indigenous sub-groups exist in the Cook Islands. However, traditional people and communities within the Cook Islands have been engaged, consulted and contributed to the development of this project” and they are considered indigenous Cook Islands people.

B. PPROJECT OVERVIEW AND THE EDA FACILITY

22. This EDA Facility Full Proposal (FP) is in response to a Green Climate Fund (GCF) Request for Proposals² (RfP) to pilot the Fund’s Enhancing Direct Access (EDA) modality, to strengthen local ownership of climate action by devolving decision-making from the GCF to the country or sub-national level. Devolution seeks to promote greater involvement of impacted communities and locally transformative solutions.
23. The EDA Facility will undergo a formal assessment in Year 4 of the project. This review will determine whether the fund should evolve into a permanent resilience-building mechanism under the Climate Change Response Bill or be integrated into the sovereign wealth fund framework or the Cook Islands Infrastructure Trust Fund. This is further elaborated in the Feasibility Study (FS).
24. The EDA Fund represents and includes the portion of the EDA facility through which improvements in the building stock will be financed – specifically Component 2 and Annex 21 EDA Fund Procedures Manual establishes the processes and procedures for implementing the adaptation activities. The EDA Fund will be a multi sector national financing mechanism to support the Cook Islands response to improving and strengthening a climate resilient society. Lessons learned including response rate to call for proposals (CfP), reimbursable grant repayment rate and impacts will be sourced from the mid-term evaluation in year 3 which in turn will analyze evidence-based impact evaluations of the awarded grants for every CfP using randomly selected representative sampling. The mid-term evaluation will compare impact outcomes across beneficiaries with a control group (those who did not receive a grant award) to evaluate the impact of different investments, and inform a robust upscaling strategy.
 - The EDA Fund will provide *Direct financing*, to 59% of the total population as direct beneficiaries of project funds to respond to climate change in the Cook Islands. The project cost for the

² GCF Enhancing Direct Access (EDA) Request for Proposals (2016):
<https://www.greenclimate.fund/sites/default/files/page/2016-eda-rfp.pdf>

implementation of priority climate resilience activities is USD41.02 million for communities, private homeowners and micro, small and medium enterprises; that will also support capacity building initiatives for long term impact and the remaining USD3.19 million is expected to fund project management and measurement and evaluation activities. The total project budget is USD44.21 million (with GCF grant funding USD39.98 million of the budget). The project will prioritize grant awards to the lowest income earners and vulnerable groups, targeting three key interventions: Community engagement and skill-building and strengthened capacity to address the impacts of climate change to institutions and vulnerable populations

- Reduce exposure to approximately 2,205 subprojects that will have increased resilience to climate change. Households will benefit from improved water security and improved health and sanitation.
 - Use proven technologies and building construction solutions with track record to demonstrate the feasibility of proposed technological solutions
25. This EDA FP builds on expertise that will be drawn from island and central Government sectors, finance, building, community and business sectors. The baseline experience and capacity that exists at Island and central government level will be developed further and will extend the value of the proposed initiative. Further, the project will integrate adaptation activities to reduce disaster impacts on the most vulnerable including the communities and small business sectors.
26. The EDA Facility paradigm shift goal is:

IF the Cook Islands are empowered to employ affordable and innovative financing is made available to enhance facilitate climate resilience via assisted compliance with the its Building Code, and AND domestic and sub-national capacity is built on through (a) upskilling of tradespersons professions and inspectors in climate- proofing buildings, (b) broadening the depth and breadth of BCI climate financial products, (c) streamlining Government support to for building climate resilience, and (d) enabling collaboration among between different central government agencies, island councils, NGOs, CBOs and community groups other stakeholders

THEN damages from climate-induced disasters will be reduced

BECAUSE building owners can will be able to afford to upgrade buildings to be resilient to climate change impacts for better climate resilience, and supported by increased technical capacity to implement climate change adaptation measures, bolstered effectively and by stronger more robust institutional partnerships and coordination mechanisms for effective climate change adaptation.

27. The goal to be achieved for this project is via two interlinked components:

Component 1 –Stakeholder Capacity building: This Component will enhance capacity of tradespeople, construction companies, building inspectors, and other stakeholders to ensure climate-resilient housing and community buildings enhance compliance with the 2019 Climate Resilience Building Code. Targeted beneficiaries will submit proposals to upgrade their houses and buildings, while stakeholders become more engaged to support better compliance. As a result, the built environment will be more resilient, reducing damages and losses from climate-related disasters

Output 1.1: Communities, home and business owners and the private sector (including tradespeople, builders and inspectors) are aware of the requirements of the Building Code 2019, as well as the funding opportunity to increase resilience of the building stock.

- **Activity 1.1.1:** Awareness raising campaign on Rarotonga and in the Pa Enua, the following actions will be undertaken to ensure that communities, homeowners and trades people are informed and prepared to participate in the project

Activity 1.1.1(a): Development of promotional, gender sensitive materials for home and business owners, communities, and trades people, in both English and maori to create familiarity with the projects objectives and processes.

Activity 1.1.1(b): Community outreach in the Pa Enua, Led by CCCI island Focal points, working directly with communities, home and businesses to raise awareness of the funding opportunity under the EDA Facility. Awareness raising events on Rarotonga, organised by MFEM and EE staff, to ensure broad understanding of the opportunity to upgrade housing and community buildings to meet the 2019

Activity 1.1.1©: Development of training materials for tradespeople and inspectors, undertaken by CITTI as the Implementing Partner of MFEM, with technical support from Infrastructure Cook Islands, to ensure full familiarity with the requirements of the building code. Delivery of training for trades people and inspectors, conducted by CITTI, focusing on the specific technical climate change requirements of the 2019 building code to enable correct application during housing and building upgrades under Activity 2.2.1: administration of sub projects.

Output 1.2: Facilitation and support of applications for access to the concessional financing from the EDA Facility for climate-resilient housing and community building.

- Activity 1.2.1: Support and facilitation of applications of quality subproject proposals: Island Councils and Focal Points will actively support the preparation and submission of applications under Windows 1 and 2 of the EDA Facility. This support will include:
- Training and outreach to potential applicants to ensure they understand the application process, the eligibility requirements and the benefits of upgrading housing and community buildings to meet the 2019 building code

- End to end technical and best practice support, including pre-upgrade surveys to capture baseline technical reviews of the buildings, to document structural conditions before application submission and implementation. Ongoing technical input to ensure compliance during works and post upgrade guidance on operations and maintenance to sustain climate resilient features and embed lessons learned for future projects

28. **Component 2** –Operation of the EDA facility to achieve house/building resilience & roll-out of Sub Projects, supported by increased access to affordable climate resilience financing to different target groups, each having terms and conditions appropriate for them. Given the high cost of housing in the Cook Islands as well as the high costs of borrowing, having a financing facility to provide concessional financing to homeowners and small businesses will ensure that necessary building improvements are affordable

Output 2.1: EDA Facility is established with required financial credit worthiness and SP technical review parameters for the management of the Facility, including origination, appraisal, and portfolio management of SPs

- **Activity 2.1.1:** Develop the constitution of the EDA Facility: MFEM will lead the development of the EDA Facility Policy, establishing the legal, governance, and operational framework required for its effective management. The EDA Facility Policy will be drafted and presented to the Government for. The EDA Facility policy will be established in accordance with Section 46(1)(d) of the Ministry of Finance and Economic Management Act 1995-96 under Part X of the MFEM Act, and will contain all relevant provisions stipulated in this project, including the sub-project eligibility criteria, appraisal processes, and portfolio management procedures. These provisions will be based on, and implemented through, existing MFEM-approved policies currently in application. The policy will also define the financial creditworthiness requirements and technical review parameters for sub-projects, ensuring that origination, appraisal, and portfolio management processes align with the technical standards of the 2019 Building Code and the climate-resilience objectives of the programme. The only addition to the existing policy framework will be the establishment of a formal agreement between MFEM and BCI, clarifying the respective roles and responsibilities in delivering concessional financing. This activity will lay the foundation for transparent, accountable, and sustainable operations of the Facility, enabling it to deliver affordable financing to targeted beneficiaries and manage a revolving fund that sustains access to concessional finance over the long term

Output 2.2: EDA facility management has the technical capacity to effectively manage the EDA Facility and implement the subproject pipeline origination and appraisal and portfolio management

Activity 2.2.1: Administration of subprojects: this activity focuses on the effective administration, implementation and management of subprojects financed through the EDA facility. This activity is implemented through the following sub-activities

Activity 2.2.1(a): Technical and Logistical support: MFEM will lead the technical and logistical arrangements for subprojects under both Windows 1 and 2. This includes the bulk procurement of tradespeople, coordinated with ICI and CIIC, as well as the bulk procurement of building goods and materials from local suppliers. MFEM will also arrange for the transportation/shipping of these materials to the Pa Enuu to reduce overhead costs and support timely delivery, enabling efficient implementation of subproject upgrades

Activity 2.2.1(b):

Window 1 Implementation: MFEM and CCCI will undertake fiduciary checks on applicants, convene and support the GAEC to evaluate and score grant applications received, and manage all administrative arrangements with grant recipients, suppliers, and trade contractors.

Window 1: Building climate change resilience in community/public buildings

Local communities, NGOs and CSOs – Local communities, NGOs and CSOs can submit grant proposals to increase the resilience of essential community buildings. During project consultations on Aitutaki³ and Pukapuka⁴ respondents from different villages highlighted their respective community halls, clinics, churches, and boat ramps for each village that were in need of climate proofing.

Activity 2.2.1(c): Window 2 Implementation: BCI will convene and/or support the GAEC in evaluating and scoring grant applications, conduct fiduciary checks on applicants, and manage administrative arrangements with grant recipients.

Window 2: Enhancing climate change resilience in privately owned buildings

Tier 1: 100% grant. Applicants must meet vulnerability criteria as determined by the Ministry of Internal Affairs (INTAFF) which includes individuals experiencing hardship, including the elderly, physically or mentally disabled, those on social security benefits. Specifically targeting the most vulnerable groups, who otherwise could not afford climate impact adaptation upgrades.

Homeowners or privately owned buildings can be either private residences or business properties.

Total grant US\$12,523.42 will be in the form of

3 chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.mfem.gov.ck/images/Development/GCF/Annex_7_-_AITUTAKI_EDA_REPORTFeb.pdf

4 chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.mfem.gov.ck/images/Development/GCF/PUKAPUKA_RAURAU_AKAMATUTU_REPORT_004.pdf

Tier 2 - 40% reimbursable grant – 60% non-reimbursable grant is awarded - can be either individuals or businesses of business enterprises operating in the Pa Enua that are equally vulnerable to the impacts of climate change, in a modality that also recognises the additional high barriers of market access for the private sector on these remote islands

Tier 3 - 60% reimbursable grants – 40% non-reimbursable grant is awarded that includes businesses.

depending on the socio-economic status of the applicant. Applicants reside on Rarotonga with existing private buildings, in particular private dwellings belonging to self-employed, sole traders, and small businesses. In 2020 consultations and a survey of 171 small businesses on Aitutaki, 78% operate out of their home and 15% in other structures (such as a garage, workshop, shop, or backyard); only 7% of surveyed businesses operate out of a dedicated office. These groups are often operating out of uninsured structures, leaving them exposed to losses and unable to quickly recover and resume business after an extreme climate event, incurring long-term losses.

Awards are limited to US\$12,523.42 for homeowners and USD \$24,900 for Community buildings.

Output 2.3: construction management and oversight of SPs and implementation will entail completion of 2,205 subprojects with full compliance certification under the 2019 Building Code

Activity 2.3.1: construction management and oversight of SPs; focuses on ensuring quality, compliance, and transparency throughout the delivery of climate-resilient building upgrades. MFEM will engage construction management specialists to rigorously monitor and supervise subproject implementation based on the approved scope of works, including verification of building materials procured and transported, and oversight of builders and tradespeople contracted. These specialists will also capture baseline surveys conducted under Activity 1.2.1, as well as data collected pre-, during, and post-upgrades. All information will be entered into the government's GEO portal and ArcGIS portal, ensuring up-to-date, live data is available throughout subproject implementation. Additionally, an accredited inspector will be appointed to conduct inspections and certify that all upgrades comply fully with the 2019 Building Code. This comprehensive oversight mechanism will safeguard technical standards, promote accountability, and ensure that all subprojects meet the required climate resilience criteria

C. ENVIRONMENTAL AND SOCIAL SAFEGUARDS LEGAL FRAMEWORK

29. The Cook Islands environmental and social safeguards framework has a number of relevant legislations and policies that have been considered in the development and design of the FP and these are provided in Table 2 below.

30. The funding proposal is consistent with the country's national priorities, policies and action plans and programs. This is elaborated in several Nationally Endorsed Plans and Strategies that highlights building and infrastructure as a priority for Resilient Development.
31. [The Te Ara Akapapa'anga Nui National Sustainable Development Agenda \(NSDA\) 2020+](#) Strategy links to the notion of the “uki” (generations) and the Cook Islands Maori world view of planning for the future. The NSDA 2020+ Goals that align with EDA funding proposal and serves to enhance the overall outcomes and priorities of Government and are included in Table 2 below.

NSDA 2020+ Goals	EDA alignment that will contribute to achieving NSDA indicator	EDA Indicator
Goal 1 Well-being,	State of where people are comfortable, healthy and happy -dedicated to welfare benefits, aimed at assisting key populations, alleviating economic hardship and supporting communities – vulnerable will be prioritised for EDA support – looking after families and vulnerable elderly will be a priority	• Family wellbeing – rapid assessment questions • 1.4 Elderly Wellbeing – rapid assessment questions
Goal 2 Welfare and Equity	Improve economic inequity, poverty, and welfare - regulate pricing and competition to ensure that consumers are provided with a fair, reasonable and affordable goods or services – eligible affordable EDA funding and alleviate economic hardship for those under minimum liveable income and ensuring equal access for both men and women headed households.	• 2.1 % of people under “minimum liveable income”
Goal 4, Manage Solid and Hazardous Waste,	Improving solid waste management and in particular waste generated through EDA implementation activities will be managed and or removed off island to be disposed or managed at the Rarotonga landfill I- identified in the ESS and ESAP	• 4.1 Increase recycling - % of total waste diverted to recycling • 4.2 Manage hazardous waste
Goal 5 Water and Sanitation,	Adequate rainwater storage and access to sufficient and safe water in homes. Improvements in septic tank systems that meet approved standards.	• 5.1 % Access to sufficient and safe water

NSDA 2020+ Goals	EDA alignment that will contribute to achieving NSDA indicator	EDA Indicator
		% of properties using sanitation systems that meet approved standards
Goal 7 Health and Healthy Lifestyles	Potable water and sanitation are necessities for improving the health and wellbeing of all communities	7.5 Achieve healthier longer lives Average life expectancy
Goal 9 Our Inclusiveness (Gender, Equity and Social Inclusion),	Targets structural and societal obstacles that hinder inclusivity for everyone. It advocates for and safeguards the rights of vulnerable groups, including women, youth, the elderly, and individuals with disabilities. Increasing the support to non-government organisations who will support communities such as Red Cross and Cook Islands Family Welfare	9.2 Advance gender equality in the workplace
Goal 11 Our Biodiversity and Natural Environment,	Protect the natural environment, including both terrestrial and aquatic ecosystems, to preserve it for future generations. Community awareness and support are vital for promoting sustainable land and marine management practices, conservation efforts – improving environmental health	11.4 Improve lagoon water quality 11.6 Biodiversity Index
Goal 12 Climate Change, Resilience, Renewable Energy and Energy efficiency,	Enhancing climate resilience through EDA interventions and promoting resilient communities	12.1 Promote resilient communities – Resilience index - Enhance protection from cyclones % of population that have access to protection from Category 3 or higher cyclones
Goal 14 A Sustainable Population	Ensures the ability of a population to support a sustainable economy and that the country's development engages with local communities and is in the best interest of Cook Islanders. EDA will strengthen local ownership and	14.1 Maintain a resident population that is consistent with our economic, social and cultural aspirations – Resident Pop not less than

NSDA 2020+ Goals	EDA alignment that will contribute to achieving NSDA indicator	EDA Indicator
	devolve decision-making to communities – support economic empowerment in the Pa Enua and local ownership and business development.	15,000, Pa Enua not less than 30% • 14.5 Reduced incentives to emigrate or out-migrate from the Pa Enua and Rarotonga – Population Index

Table 1 NSDA 2020+ Goals and SDA alignment

32. Cook Islands Joint National Action Plan on Climate Change and Disaster Risk Management (JNAP2) where in: Strategy 2 – Water and Food Security; Strategy 3 – Environmental Sustainability; and Strategy 9 – Human Health and Welfare, Health Sector related issues and means to address them are recognized and costed at a high-level.
33. 2018 Country Program and Climate Change Policy all signal that the critical importance of addressing climate change and emergency preparedness across the health sector is one priority area that needs urgent attention.
34. [Applicable Cook Islands safeguard legislation, policies and strategies](#) are provided in Table 3.

Cook Islands Ministry or Agency Responsible	Safeguard Function	Applicable Safeguard Legislation, Policies and Strategies
Ministry of Internal Affairs (MIA)	MIA advances Decent Work principles and standards as a recent member of the International Labour Organisation. By promoting the rights and obligations of employers and employees, businesses can grow sustainably. Promoting and monitoring Consumer protection and Fair trading form another layer of protection offered to our community. Provide technical advice and expertise in the integration of gender perspectives across government national priorities	• Employment Relations Act 2012 • Cook Islands Occupational Health and Safety Policy Draft 2019 • Cook Islands ratifications of ILO C029, C105, and C182 • National Policy on Gender Equality and Women's Empowerment and ACTION PLAN 2019 – 2024.
Office of Public Service Commissioner (PSC)	PSC will monitor and require all government agencies to establish	• Public Service Act 2009

Cook Islands Ministry or Agency Responsible	Safeguard Function	Applicable Safeguard Legislation, Policies and Strategies
	and maintain a safe and healthy work environment for employees, contractors and visitors	• Public Service Amendment No.8 2016 • Occupational Safety and Health Policy 2016 • Code of Conduct Policy GOVERNMENT OF THE COOK ISLANDS Under this government policy, Sexual Harassment is a serious misconduct.
Cook Islands Investment Corporation (CIIC)	CIIC statutory corporation that manages and maintains all government assets	• Cook Islands National Infrastructure Investment Plan • Draft Occupational Safety and Health Policy
Te Marae Ora (TMO) Ministry of Health	TMO is the main healthcare provider in the Cook Islands responsible for setting national health policy and managing the day-to-day delivery of health services. TMO will provide guidance on Sanitation Sewage and provide input into water and waste disposal policies TMO Policy prevention and protection from sexual exploitation, sexual abuse and sexual harassment (SEAH) Act to prevent harassment.	• Public Health Act 2004 • Cook Islands Health Workforce Plan 2016-2025 • National Water Policy 2016 • Ministry of Health Act 2013 • The Public Health (Sewage and Wastewater Treatment and Disposal) Regulations 2014 • Waste Management Policy. National Infection Prevention and Control Guidelines 2023. Recently approved, but not yet in the public domain. • The Cook Islands Integrated National Strategic Plan for Sexual and Reproductive Health 2014 – 2018 • Harassment Act 2017
Bank of Cook Islands (BCI)	BCI is a state-owned enterprise established by an Act of Parliament in 2003, amended in 2019 and is the only locally owned bank with the	• Environmental and Social Risk Policy Framework.

Cook Islands Ministry or Agency Responsible	Safeguard Function	Applicable Safeguard Legislation, Policies and Strategies
	largest branch banking network in the Cook Islands. BCI is a GCF Accredited Entity has established policies specifically aligned to the GCF criteria including BCI's The E&S Policy sets out BCI's Environmental and Social Management System and BCI's approach to effecting sound social and environmental risk management in the Projects it finances. The Sustainable Finance Framework outlines BCI's green banking facilities and the principles including environmental and social standards and safeguards the Bank is to apply to the projects it finances. BCI is an Implementing Entity for the EDA project.	- Gender Policy V2 April 2021 - Sustainable Finance Framework
Cook Islands National Environment Service (NES)	NES was established to protect, conserve and ensure the Cook Islands environment is managed sustainably. NES is primarily responsible for developing policy, enforcing regulations against illegal rubbish dumping, monitoring and enforcing environmental standards in the Cook Islands.	Environment Act 2003 Sanitation (Wastewater Management) Policy 2016
Ministry of Finance and Economic Management	MFEM created by the enactment of the Ministry of Finance and Economic Management Act (MFEM Act) 1996 at the outset of the Cook Islands Economic Reform Program. - Is the GCF Accredited Entity Planning and managing development assistance for the Cook Islands. - Overseeing the management of strategic Government infrastructural projects	Cook Islands Government Procurement Policy Tarai Vaka Process Cook islands Activity Management System Environmental and Social Safeguards Framework (ESSF) Gender Policy and Tools Grant Management Policy and Procedures Anti-fraud and corruption

Cook Islands Ministry or Agency Responsible	Safeguard Function	Applicable Safeguard Legislation, Policies and Strategies
		• Anti-money laundering and counter terrorism financing policy • Grievance Procedure • Whistleblowing policy
Office of the Ombudsman	Ombudsman conducts independent and impartial investigations initiated upon receipt of complaints or acting on his own initiative. Responsible for investigating complaints against Government Ministries and Crown Agencies under the • Ombudsman Act 1984 • Official Information Act 2008. • Police Act 2012.	• Anti-Corruption Committee (ACC) formed in 2011 • Anti-fraud and Anti-corruption Policy 2018 – Whistle blower complaints are handled by the Office of the Ombudsman
Infrastructure Cook Islands (ICI)	ICI responsible for a variety of major government capital infrastructure projects across the Cook Islands, including Compliance with the Cook Islands 2019 Building Code, Standards and Act	• National Water Policy 2016 • Cook Islands National Solid Waste Management Strategy 2013 – 2016 under review • Cook Islands Building Code 2019 • Cook Islands Infrastructure Act 2019

Table 2 Cook Islands Safeguard Legislation, Policies and Strategies

D. GCF Safeguard Requirements

35. The objectives of the GCF Revised Environmental and Social Policy (ESP) (B.BM-2021/18), are to:
- Avoid, and where avoidance is impossible, mitigate adverse impacts to people and the environment;
 - Avoid, and where avoidance is impossible, mitigate the risks of sexual exploitation, sexual abuse and sexual harassment SEAH to people impacted by GCF-financed activities,
 - Enhance equitable access to development benefits; and

- Give due consideration to vulnerable and marginalised populations, groups, and individuals, local communities, indigenous peoples, and other marginalised groups of people and individuals that are affected or potentially affected by GCF-financed activities.
36. The ESP requires that all projects be screened for their environmental and social impacts, that those impacts be identified, and that the proposed project be categorised according to its potential environmental and social impacts. Regardless in which category a project is screened, all environmental and social risks shall be adequately identified and assessed by the AE in an open and transparent manner with appropriate consultation.
37. The scope of the environmental and social assessment shall be commensurate with the scope and severity of potential risks. The assessment has assessed all potential environmental and social risks and includes a proposed risks management plan or in this case an ESAP.
38. All projects supported by the GCF shall be designed and implemented to meet the ESP Performance Standards, although not all ESP performance standards may be relevant to every project, as it is dependent on the nature and scope of the project.

E. SCREENING METHODOLOGY AND INTEGRATION OF ENVIRONMENTAL SOCIAL SAFEGUARDS

Environmental and Social Screening

39. The EDA environmental and social screening takes into account GCF Safeguard objectives as well as MFEM ESS requirements. The Cook Islands Tarai Vaka Process (TVP) includes the MFEM Environmental and Social Safeguards Framework (ESSF) that was established as part of MFEM Accreditation to the GCF and aligns to the Cook Islands commitment for sustainable development and integration of environmental and social considerations into projects. The MFEM ESSF has been developed to avoid, minimize, reduce or mitigate negative environmental or social risks and impacts of all projects. Nine standards have been developed to be applied when developing and implementing projects. The standards are designed to help manage the risks and impacts of a project through a risk and outcome-based approach. The risks and impacts have been identified are also included in the Risk Assessment and Management section F of the FP. These nine standards are included as part of the ESS Assessment Appendix
- Environmental and Social Instruments undertaken include Environmental and Social Impact Screening: Completed using the GCF Screening Checklist (Appendix 1).
 - GCF SEAH Screening Checklist (Appendix 2): Used to assess risks of Sexual Exploitation, Abuse, and Harassment (SEAH).

- Indigenous Peoples Policy Assessment: While no distinct Indigenous sub-groups exist under GCF definitions, traditional communities (tangata enua) were consulted and involved throughout.

Environmental and Social Impact Screening

40. The project consists of small-scale, in-situ infrastructure upgrades, primarily to homes, small businesses, and community buildings, such as roof tie-downs, re-roofing, and water and sanitation improvements. These interventions are localized, avoid significant environmental disruption, and do not involve land acquisition, displacement, or significant risks to vulnerable populations. Based on the nature and scope of activities, the project has been classified as Category C, indicating minimal or no adverse environmental and social risks and impacts. The interventions are limited to in-situ upgrades of existing homes and community buildings across the Cook Islands, with no expansion beyond current footprints. All sub-projects fall within Category C, however a further screening process will be conducted before approving any sub-projects to ensure this risk level remains appropriate.
41. The screening process evaluated a comprehensive set of environmental and social criteria, confirming that the project does not involve associated facilities, trans-boundary impacts, critical infrastructure, or land acquisition. All activities are confined to existing sites, thereby avoiding sensitive ecological zones, protected areas, and cultural heritage sites. The project does not affect indigenous peoples as defined by the United Nations, although traditional communities have been consulted and engaged.

Key environmental and social considerations such as labor conditions, occupational health and safety, pollution prevention, community health and safety, and stakeholder engagement were assessed and found to be either not applicable or adequately addressed through existing national legislation and project-specific measures. Some environmental and social triggers were identified and addressed through targeted actions in the project's Environmental and Social Action Plan.

Sexual Exploitation Abuse, and Harassment Assessment

42. SEAH initial screening and through discussions suggests that there is limited likelihood SEAH to occur. However, all GBV and SEAH matters raised through the EDA Facility GRM will be managed in partnership with Punanga Turuturu Itivaine (PTI), in accordance with an existing MOU between MFEM and PTI that covers GBV and SEAH for all MFEM climate finance projects. PTI's role within this project is limited to:
 - Conducting GBV and SEAH Awareness raising initiatives for communities and stakeholders relating to this project.

- Delivering trainings to all relevant stakeholders include contractors, tradespeople, activity contract managers, project management staff, inspectors to ensure understanding of GBV and SEAH Obligations when implementing subprojects and
 - Providing survivor-centered support and engagement in addressing GBV/SEAH related grievances alongside the GRM team. All Non-GBV/SEAH grievances will be managed directly by the PMU
43. Potential subproject SEAH risks will be screened in line with Public Service Act requirements and in compliance with PSC manual and Code of Conduct Policy. During implementation the SEAH checklist will be further developed however please see Appendix 3 aSEAH Screening checklist to be completed by the Island Focal Points during applications, and the Activity Contract Managers before commencement of the subproject implementation.
44. The AE retains overall responsibility for ensuring SEAH is appropriately managed in line with GCF policies and the projects ESAP. PTI's role in SEAH risk management focuses on early awareness raising, capacity building and survivor centred grievance handling (where GBV/SEAH cases arise).
45. The AE, with PTI will coordinate and support the PMU to:
- Design / refine / expand the SEAH subproject screening assessment / checklist
 - Monitor and report on GBV/SEAH related cases / grievances
 - Conduct awareness raising on the ESAP, SEAH Matters and the EDA GRM, including providing clear information on when and how to report incidents, with full contact details to enable early interventions.
46. Promote a culture of safeguarding vulnerable groups and enabling open, respectful dialogue between all stakeholders.

[Indigenous Peoples Assessment.](#)

Recognition and Definition of Indigenous Peoples

47. In the Cook Islands, Indigenous Peoples are legally and culturally recognized as Cook Islanders of Māori descent, defined under Section 21 of the Cook Islands Immigration Act 2021 as “a person who is part of the Māori Race indigenous to the Cook Islands.” Additionally, the MFEM Environmental and Social Safeguard Framework – ESS Standard 7 refers to Indigenous Peoples and traditional local communities as tangata enua, or people with blood ties to any of the islands in the Cook Islands.

Screening and Risk Categorization

48. The GCF Environmental and Social Safeguards Screening Checklist (Appendix 1) notes that no differentiable Indigenous sub-groups exist in the Cook Islands under the UN working definition.

However, traditional communities and tangata enua have been actively engaged and consulted throughout the development of this project and are considered Indigenous Cook Islands people for the purposes of this assessment.

49. Based on this context and the nature of the activities, the project is classified as Category C, indicating minimal or no adverse impacts on Indigenous Peoples. The project does not involve land acquisition, displacement, or resource extraction.

Inclusive and Culturally Grounded Design

50. This project has been entirely designed by tangata enua of the Cook Islands, with deep involvement from local stakeholders. Every lesson learned, challenge faced, and success achieved in previous initiatives has been integrated into the project design, not only through formal reports but through the lived experience and insights of the communities themselves.
51. This ensures that the project is:
- Culturally appropriate
 - Locally owned
 - Reflective of traditional knowledge and governance structures

Free, Prior, and Informed Consent (FPIC)

52. Given the inclusive and community-led nature of the project, FPIC principles have been inherently embedded in the design process. Should any future sub-projects or activities arise that may affect specific communities or traditional lands, a formal FPIC process will be initiated in accordance with GCF policy, using culturally appropriate methods and respecting traditional decision-making protocols.

Engagement and Participation

53. The project has demonstrated robust engagement with traditional communities, including:
- Consultations with tangata enua across islands
 - Inclusion of diverse voices, elders, women, youth, and other community leaders
 - Use of local languages and culturally relevant communication methods
54. This engagement will continue throughout implementation, monitoring, and evaluation phases.

Grievance Redress Mechanism

55. A culturally sensitive grievance mechanism will be established and communicated to all communities. It will be accessible to tangata enua and other ethnic groups, and responsive to concerns including those related to Sexual Exploitation, Abuse, and Harassment (SEAH). Communities will also be informed of their right to access the Project Level GRM, the MFEM institutional GRM as well as the GCF independent redress mechanism

Monitoring and Reporting

56. Monitoring will include:

- Participation and satisfaction of tangata enua
- Disaggregated data collection where relevant
- Feedback loops to ensure community voices inform adaptive management

Monitoring will be participatory and reflect the values and priorities of Cook Islands communities.

F. ANALYSIS OF RESULTS

57. To effectively manage the project's low-risk environmental and social profile, a suite of targeted instruments was applied. The Environmental and Social Impact Screening, completed using the GCF Screening Checklist (Appendix 1), confirmed the project's Category C classification. This designation supported by further analysis, indicates that the proposed activities pose minimal to no environmental or social risks, owing to their small scale and nature. Any potential impacts are readily mitigable through standard measures. In addition to the core screening, the GCF SEAH Screening Checklist (Appendix 2) and the Indigenous Peoples Policy Assessment were conducted to ensure that risks related to sexual exploitation, abuse, and harassment (SEAH), as well as engagement with traditional communities (tangata enua), were thoroughly evaluated and addressed. Collectively, these instruments reflect a robust and proactive safeguards framework, reinforcing the project's commitment to environmental and social integrity throughout its implementation.

58. All known risk factors have been considered. For all criteria applicable to the project there is a response of **NO** to all questions. The analysis provided below indicates that there may be potential impacts from project activities and are included in the Environmental and Social Action Plan (ESAP) and validates the Category C (low risk) assessment as a result of the screening. Furthermore, any minor risks or consequences discovered can be readily avoided by using basic management actions. An environmental and social action plan was needed under the Green Climate Fund (GCF) Revised Environmental and Social Policy (the ESP) (B.BM-2021/18) to appropriately screen and analyse potential environmental and social implications.

Potential impacts are limited to the project footprint

59. The identified impacts link directly to actions being implemented by the project. These impacts are thus limited to the project footprint. Thus, while the project is intended to support systemic change that can be scaled up any failures in implementation that could result in additional negative impacts are not identified as having a risk of spreading beyond the project areas. E.g. might include delays in materials and building construction timelines stretched.

Potential adverse impacts can be addressed by the use of recognized good management practices

60. The most likely or potential risks identified are linked to installation of water tanks and upgrades of sanitation systems where there may be instances where the potential impact of earthworks – relating to excavation, drainage, roads and building platforms or tourism and commercial extension or renovations or removal of coral. It is recognised that the small-scale works will not normally trigger occupational health and safety impacts but if there appears to be an issue it can effectively be managed through well utilized management practices including effective planning of activities and training on the job with all staff involved in the sub-project activity. All other risks can also be effectively managed through a standardized project management structure.

Post-installation Monitoring

61. Pollution, resource efficiency, waste, septic upgrades will require ongoing monitoring post installation. Pollution and resource efficiency are addressed in the project through a combination of preventive measures, mitigation strategies, and monitoring protocols. There are currently waste management and recycling programmes implanted nationally by the National Environment Service. Procedures have been identified post installation and using current national programmes. The responsible parties are National Environment Service and Infrastructure Cook Islands with the support of Ministry of Health. All have roles in ensuring reduction of waste and pollution and enforcement of regulations.

Cumulative and Indirect Risks

62. The project identifies cumulative and indirect risks associated with its activities, particularly under Component 2: Climate-resilient rural water infrastructure is being addressed by EDA. These risks are related to the broader environmental, social, and systemic impacts that may arise over time or as a result of interactions between multiple project activities. Cumulative risks refer to the combined effects of multiple project activities or external factors that may amplify environmental or social impacts such as Water Resource depletion that is likely in Aitutaki due to increased extraction of groundwater or surface water across multiple communities which could lead to over extraction lowering water tables and reducing water availability for ecosystems and downstream users such as farming or home vegetable gardens. Risk of saline intrusion into groundwater sources is already a major issue in the Northern Group Islands which means increased pressure on fragile water sources. The reliance on rainwater harvesting or spring-fed systems in multiple communities could strain these fragile sources, especially during droughts or dry seasons. Cumulative Waste Generation has already been addressed in the ESAP and waste management challenges particularly on the Northern Group remote islands with limited disposal facilities.
63. Indirect Risks: - Indirect risks are secondary effects that may not be immediately apparent but could arise as a consequence of project activities. This may include: Social Conflicts over shared

resources, gender and social inequalities – such as unequal access to water infrastructure and health risks due to poorly managed water systems that leads to contamination, increasing the risk of waterborne and vector-borne diseases.

64. Mitigation Measures include sustainable water management with regular monitoring of water tables and extraction rates to prevent overextraction. To address these cumulative and indirect risks, the project includes the following strategies: Sustainable Water Management: Regular monitoring of water tables and extraction rates to prevent over-extraction. Involving communities in the development of Drinking Water Safety and Security Plans to ensure equitable access and ownership. Using an established grievance redress mechanisms to address disputes and conflicts. Important will be to engage stakeholders to identify and address indirect risks as they arise.

G. EXCLUSION LIST

65. The following are exclusions applicable to the project as it has been applied and will be applied to those to be identified during implementation and are included in Table 5 below.

Excluded Activities	
Activity Category	Description
Any	Any Activity that will lead to involuntary resettlement or land acquisition (including non-physical displacement and involuntary restrictions to economic activities and land use)
Any	Any Activity that will lead to negative changes to legitimate tenure rights
Any	Any other activity that during the implementation, would lead to medium or high environmental or social risk, including IP risks
Any	Introduction of any species which have the potential to become invasive including GMO's
Any	No disturbance of any kind will be undertaken where there are asbestos-containing materials
Infrastructure	Construction, maintenance or rehabilitation of dams.
Any	No resettlement, dispossession, land acquisition and economic displacement of person and communities.

Infrastructure	Construction or rehabilitation of rural roads
Equipment	Any photovoltaic equipment from countries who have NOT ratified the ILO Forced Labour Convention 1930 (No. 29) and the Abolition of Forced Labour Convention, 1957 (No. 105).

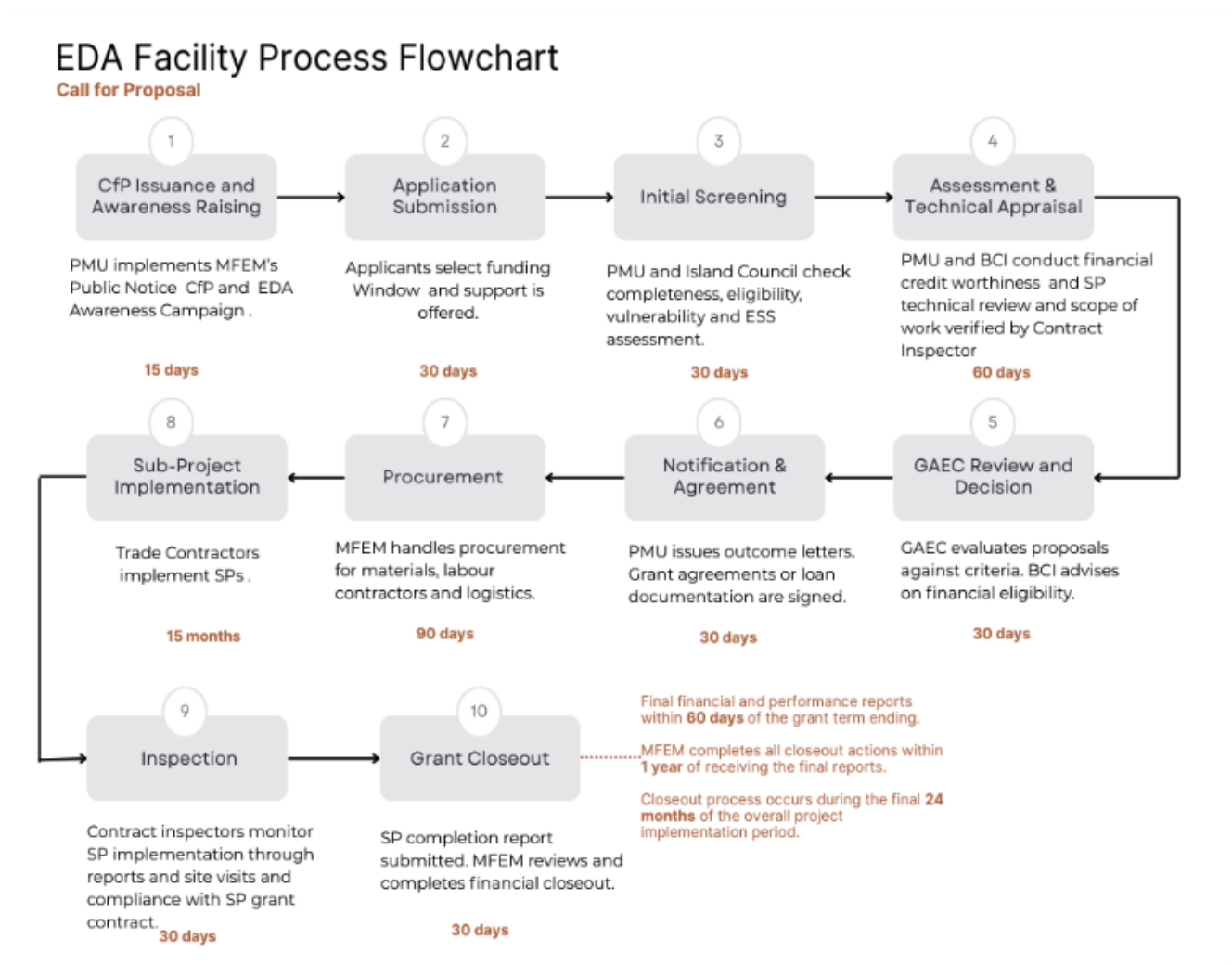
Table 3 Excluded Activities

H. Subproject Screening and Categorization

66. For each subproject an Environmental and Social Screening Assessment will be carried out and will be approved prior to Grant approval. Further monitoring as required will be undertaken during implementation.
67. The project's innovation is in the delivery of climate finance which moves towards a more stakeholder-driven and programmatic approach and the use of blended finance. The project considers the new innovative mechanisms that target our most vulnerable people and communities, as well as private sector small business owners and ESS subproject screening support that is necessary will be important and provided by the PMU staff and National Environment Service Staff resident on island.
68. EDA Sub-Project Environmental Screening Assessment Appendix 3 includes the Application Screening Forms that will be completed by applicants with the support of the PMU/Island Focal points. The ESS assessment will review the subproject application to identify whether it is likely to cause adverse social and environmental risks and/or impacts.

Subproject Screening Process

Figure 2 EDA Facility Process Flowchart



69. The subproject Initial Screening Process begins at Stage 3 of the Call for Proposals. Where the initial screening is undertaken by the PMU/Island Focal Points and the Islands Council.

- **At Stage 3:** The EDA Sub-Project Environmental Screening Assessment (Appendix 3) and the EDA sub-project SEAH Screening checklist (Appendix 4) is completed as part of the Application

Submissions. This screening forms part of the overall completeness check. Once completed, the applications and ESS assessments and SEAH Checklists are forwarded to the PMU and BCI for technical review.

If the subproject triggers an exclusion list item, the application is ineligible and will NOT proceed.

- **At Stage 4:** (ESS-related review), the PMU verifies and clears the applications and ESS screenings to progress to the next step. This next step includes BCI creditworthiness checks, as well as completion of the National Environment Significant Declaration (ESD) forms and process: <https://environment.gov.ck/esd-form-online/>. However, there may be instances where a subproject may be categorized as low to minimal risk, a series of additional steps will be taken. Figure 3 details the steps for low to minimal risk subprojects that may be considered NES Tier 2 subprojects that will undertake further assessment and the additional steps that must be taken e.g. for sanitation system upgrades. As part of the ESS Review, the PMU undertakes the following:
 - i. Location sensitivities: If heritage/protected areas or risks to community resources are identified, the PMU ensures that are captured in the ESD form for NES review.
 - ii. Site-specific hazards: Construction risks, waste handling, or other hazards are documented, included in contractor guidance and workorders, and verified during inspections.
 - iii. Gender or SEAH risks: If identified, the PMU coordinates with PTI for additional community monitoring and awareness activities.
 - iv. Community health and safety risks: Issues such as sanitation, water quality, or waste management triggers are reflected in the ESD form for NES review. The PMU also captures these for post implementation monitoring and coordinates with TMO as needed.
 - v. Minimal risk classification: If none of the above risks are triggered, the subproject remains minimal risk and will proceed to stage 5 – GAEC review.
- **National Compliance Note:** upon completing the ESS related review, the PMU compiles the environmental significance declaration (ESD) form, incorporating all identified risks and mitigation measures. This document is submitted to the National Environment services for assessment and environmental permit approval. The NES evaluates the ESD form and determines whether an environmental approval is required. For applications that meet NES requirements, NES completes the review and approves the necessary permits and advises the PMU of the outcomes Subprojects receiving NES Tier 1 approvals will proceed to **Stage 5**.

- Subprojects that are assessed by NES as Tier 2, will require further information to be provided by the applicant and the PMU, this may include an engineer's report, a Scientific and Technical Assessment (STAC) Legal Assessment and an Environmental compliance assessment (these are all done internally within the NES). Tier 2 subprojects are then submitted to the Island Environment Authority (IEA) for approval of the subproject. If Tier 2 Projects are approved by the NES and IEA these approvals will proceed to Stage 5
- **Stage 5** where full applications and assessments are presented to the Grant Evaluation Committee (GAEC), the decision-making body for the EDA Facility. Subprojects that have not submitted or completed the NES ESD forms will **not** be presented to the GAEC. Subprojects that have not received NES or IEA approval / permits will not be approved by the GAEC. .

SEAH Subproject Screening Checklist

70. The EDA sub-project SEAH Screening checklist (Appendix 4) is completed for each subproject at Stage 3 of the application process. This screening evaluates key risk factors, including project scale, workforce composition and accommodation, community vulnerability, gender dynamics, social and cultural norms, the presence of grievance mechanisms, and contractor adherence to SEAH policies and Codes of Conduct. Each factor is rated as Low, Medium, or High risk based on evidence from the application.
71. Once the Stage 3 screening is completed, the PMU uses the checklist to guide and provide advice to the GAEC for subproject approvals in a structured, risk-based manner. Operationally, this works as follows:
 - Low Risk – Subprojects that meet the criteria for low risk (e.g., small-scale, community-based, local workforce, no temporary accommodation, strong community oversight) proceed with standard mitigation measures embedded in contractor contracts, work orders and guidance and PMU monitoring. No additional referral is required.
 - Medium Risk – Where the checklist identifies moderate risk factors (e.g., some potential interactions with vulnerable groups, minor gaps in mitigation planning), subprojects are approved conditionally, requiring a mitigation plan. The PMU coordinates with Punanga Turuturu Iti Vaine (PTI) and relevant community stakeholders to identify and implement site-specific measures before work commences.
 - High Risk – Subprojects with high SEAH risks (e.g., major worker-community separation, high potential for gender-based violence or harassment) are deemed ineligible and will not proceed to stage 5.
72. At Stage 4, the PMU conducts a verification review of the SEAH checklist and other ESS assessments. This stage ensures that any mitigation measures identified at Stage 3 are implemented

appropriately, that community grievance mechanisms are operational, and that contractor compliance with SEAH standards is confirmed. Any residual risks identified during Stage 4 trigger additional interventions or may prevent subproject approval.

73. This process ensures that:

- SEAH risks are systematically identified and rated.
- GAEC approval decisions are directly linked to risk levels, with clear operational actions associated with each level.
- Subprojects with higher SEAH risks are proactively mitigated or declined, protecting communities and ensuring compliance with GCF safeguards.
- Grievance mechanisms are culturally appropriate, confidential, and accessible, with oversight provided by PTI and the PMU.

Monitoring and evaluation of subproject ESS implementation will be carried out throughout **Stages 8 and 9**

74. ESS and SEAH Subproject Approval Decision Tree

As part of the Call for Proposal process, the following checks and stages are completed by the Island Focal Points, PMU, and other relevant national authorities. Stage 3: Initial Screening
ESS Subproject Assessment & SEAH Screening

Check 1: Does the subproject trigger any ESAP exclusion list items?

- Yes → Decline application (PMU)
- No → Proceed to next check

Check 2: Does the SEAH Screening identify High Risk?

- Yes → Decline application (PMU)
- No → Proceed to next check

Check 3: Does the subproject meet Low or Medium Risk SEAH criteria?

- Low Risk → Proceed with standard mitigation measures → proceed to Stage 4
- Medium Risk → Conditional approval with mitigation plan coordinated by PMU & PTI → proceed to

75. Stage 4: Review & Information Verification

- Scenario A: All Stage 3 criteria are met, and no further information is required
 - Action: All applications complete the ESD at this stage
 - NES can approve and grant permits for eligible subprojects → proceed to Stage 5
 - Scenario B: Subprojects identified by NES as Tier 2 (require further information)
 - Action: PMU and applicant provide additional information and mitigation measures
 - Approval: Island Environment Authority (IEA) reviews and either:
 - Approves subproject and grants permit → proceed to Stage 5
 - Declines subproject → application declined
 - Information Flow: All subproject approvals and declines are reported back to the PMU, who presents the information to GAEC for knowledge, action, and final approval.
-

76. Stage 5: Final Approval

- Projects that meet all Stage 3–4 criteria, with required mitigation measures implemented and permits obtained, receive final GAEC approval.
- For the full decision process on grant awards, please refer to the O&M Manual Section 4: EDA Fund Grant Selection and Award Process.

I. ENVIRONMENTAL AND SOCIAL ACTION PLAN

- 77. The Environmental and Social Action Plan (ESAP) indicates that the potential impacts identified through the initial ESS Screening are low in both risk and significance. However, industry best practice should be followed during the in-situ technical inspections by Trade Contractor and Inspectors and during upgrades of the programme. It contains the management measures for the identified suite of activities for the EDA project as well as instructions for ongoing environmental and social screening of community-level interventions as they are selected and developed.
- 78. Of the three components, only some activities under Component 2 environmental risks are considered minimal due to the project's design, adherence to environmental laws, and proactive mitigation measures.
- 79. Risks under Component 2 will be primarily be addressed during the individual CfP requests screenings and Environmental and Social Impact Assessments. The medium risks are estimated to

impact <10% of the subprojects funded by the EDA. Every EDA subproject will have an ESS screening form that will provide an assessment of risk levels (as above) across all eight of the performance standards.

80. The Environmental and Social Action Plan below summarizes the key risks for the project activities, mitigation measures for those risks and a monitoring plan to ensure risks are adequately monitored throughout implementation. Project risks have been identified and ranked by risk level and classed into a four-level risk score that corresponds to the International Finance Cooperation (IFC) definitions on risk categorisation.
- Low risk is equivalent to IFC Category C classification: “activities with minimal or no adverse environmental or social risks and/or impacts”.
 - Low to Medium risk is equivalent to IFC classification: “activities with potential limited adverse environmental or social risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures” such as the upgrades for the sanitation system.
 - High risk is equivalent to IFC Category A classification: “activities with potential significant adverse environmental or social risks and/or impacts that are diverse, irreversible, or unprecedented”. Noted that no high-risk category A activities will be funded by EDA
 - In a number of areas risks are also identified as a range (1 – 3) and with mitigation identified the risk level is expected to be minimal and averted.
81. Professional oversight will be engaged to ensure best practice is followed. Proper planning and management of potential generated waste streams will be undertaken. Community health, safety and security guidelines will be followed for all physical interventions. Labour and working conditions and equal opportunities will be encouraged. The value of the improved community resilience means that the overall environmental and social impacts of the projects will be positive.
82. In addition, this section provides guidance to the AE and EEs on how to ensure environmental and social safeguards are integrated into technical advisory activities. This will ensure that all contracts including labour practises and policies, plans, developed under this project are screened to ensure that the development process and the recommendations follow the GCF environmental and social safeguard principles.
83. To further mitigate risks, the project will also build upon long-standing community reuse and recycling practices in the Pa Enua. Waste materials generated from retrofitting activities, such as iron roofing, windows, doors and packaging materials and septic tanks are rarely treated as waste. Instead, they are routinely repurposed:
- Flashing and offcut roofing irons sheers are used by local farmers to strengthen pig pens or plantation fencing.

- Tie-downs from shipping crates are repurposed by vainetini (local mamas) in weaving handicrafts such as ei-katu (flower crowns) Tairiiri (fans) and Kete (baskets).
- Roofing iron is reused for fencing, small farming sheds and water collection systems for irrigation and storage.
- Doors and windows are repurposed as farm sheds / storage for their farming equipment.
- Septic tanks are crushed and re-used as road fill or concrete refill material.

84. In the Pa Enea, reuse and recycling are not exceptions but a way of life. Isolation, scarce resources, and high import costs have fostered a culture of innovation where materials such as roofing iron, timber, or even septic tanks are immediately repurposed for practical use. This ingrained practice, passed down through generations, ensures that retrofitting outputs are absorbed as resources rather than waste. By combining these traditional norms with structured monitoring, the project minimizes environmental risks while generating co-benefits that strengthen household livelihoods and community resilience.

85. The ESAP matrix was prepared for the EDA Funding Proposal. Due to the nature and scale of the proposed activities, the environmental and social risks are considered 'low'

Table 4 ESAP for EDA

Proposed Project Activities	Identified risks	Risk Level ⁵	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost ***
Component 1 – Community Engagement and Consultations							
EDA Awareness Campaign And Effective community Engagement	Island discussions confirm lack of understanding of the limitations of the EDA Fund as well as the importance of Environmental and Social impacts risks and opportunities Island public meetings are poorly attended	1 - 3 1 - 3 1 - 3	MFEM and PMU will advise Islands Government on when visits will commence and the overall implementation plan for EDA project Prior to Inception Mission on each island Full Consultation Plan for each Island is prepared and confirmed by the Island Council prior to Inception Mission	Inception Mission will include from Rarotonga • AE • EE • PMU/PM • PTI • Trade Contractor • Contract Inspectors • Project Manager is responsible for Annual Assessment and reporting	At inception 6 monthly follow up with communities included in Annual reports	Number of elderlies, people with disability and Anuanua attending the awareness events. Disaggregated attendance record Photographs of meetings and outcomes document produced for all consultations and	NA

⁵ Risk significance key:

1 (Negligible) - Negligible or no adverse impacts on communities, individuals, and/or environment.

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

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

4 (Severe) - Adverse impacts on people or environment of medium to large magnitude, spatial extent and duration more limited than level 5 (e.g. predictable, mostly temporary, reversible). The potential risk impact may affect the human rights, lands, natural resources, territories, and traditional livelihoods of indigenous peoples are to be considered at a minimum potentially severe.

Proposed Project Activities	Identified risks	Risk Level ⁵	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost ***
Inception Mission to all Islands			Full detail of CFP information is provided in both Cook Islands Maori and English Island walks to confirm possible sub-project program.			signed off by the Island Council and or those present. Project inception Report Annual Assessment Report and feedback from communities on implementation progress.	
Component 1 Capacity Building and Training Programme							
Accredited Training Programmes for Builders	Equal access for women and men for training opportunities	1 - 3	Health and safety requirements to be written into contracts are explained clearly and concisely and what to expect	Cook Islands Tertiary Training Institute (CITTI)	Year 1 training programmes on Il Pa Enua Islands completed	Number of Accredited Island Infrastructure staff trained per island	
Accredited Training Programmes for Inspectors	Lack of understanding of the training requirements	1 - 3	OSH trainings for all local island workers who will receive appropriate equipment for their activities including specialised PPE equipment as needed	PMU Project Manager to oversee training and programmes delivered	Inspectors provide 6 monthly reports to PMU on progress per island	Disaggregated number oof accredited and trained per island	
Accredited Training	Labour exploitation issues raised and insufficient understanding provided regarding	1 – 3	Training would include asbestos identification awareness raising.	- Contract Inspector - Trade Contractor		- Builders - Inspectors - Hammerhands	

Proposed Project Activities	Identified risks	Risk Level ⁵	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost ***
Programmes for Hammer Hands and Building Apprentices	health and safety in the work place Poor uptake for training programme		Training on island during installation and implementation of sub-projects			PMU Annual Reports to reflect number of disaggregated staff employed on each island and progress updates on subprojects Central Agency Staff in the Pa Enua are involved in subproject implementation and include EDA actions in Annual Ministry Reports and PMU updates	
Trade Contractor call for Island Staff sub-project Implementation	Working condition questioned Equal opportunities for Women to be employed Ensure only those eligible to work are	1 - 4	Contract negotiations with Island Staff –Intaff personnel will work with PMU and Island Council to confirm contract arrangements and to ensure equal employment opportunities are provided to women and men as well as conditions of employment are maintained during implementation.	Project Manager Trade Contractor INTAFF Representative – checking to see that labour conditions are appropriate and workers are provided with personal protective equipment,	- During project implementation PMU will address labour issues when undertaking subproject inspections	Full implementation of EDA sub-projects with Island Staff (Number disaggregated) under the supervision of Trade Contractors > 13% of contracts for	

Proposed Project Activities	Identified risks	Risk Level ⁵	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost ***
	employed – no child labour			ensure adequate training is provided to all.		builders/tradespeople to undertake the upgrade are awarded to women 6 monthly reporting and project update At least 50% implementation staff include women	
Communication and training of ESS and SEAH and Gender sensitisation	Activities associated discrimination and sexual harassment or exploitation are difficult for some to understand or discuss Discriminatory practises for programme activities	1 - 3	All workers will be sensitised on existing national, and local if applicable, legislation, ESS and GCF policy related to SEAH. Monitoring of SEAH incidences will be included in the Grievance Redress Mechanism, as outlined in this document. Carried out during the training sessions above and spot checks carried out during implementation of Sub-projects	• Project Manager • PTI Gender Specialist • ESS/Monitoring Specialists • Trade Contractor • Contract Inspector	Mitigation measures to be integrated into the implementation of the subproject activity – within the project timeline Ensuring that information is readily available for distribution to all. PMU to ensure an open door policy for complaints if any that the	No. of Workers disaggregated are sensitised on national legislation, ESAP and GCF policies related to Gender, ESS, SEAH General safety and care concerning SEAH is heightened – Requests for information increased and recorded	

Proposed Project Activities	Identified risks	Risk Level ⁵	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost ***
			Carried out with small community groups led by NGO and religious group support on the island		redress mechanism is clear and well publicised in CI Maori language	No. of SEAH incidences are reported and included in Annual reporting in the Grievance Redress Mechanism.	
Component 2 Window 1 and Window 2							
Subproject Implementation	Understanding the limitations of the subproject level actions and the activities are designed to be responsive to CI climate risk profile.	1 - 3	Supporting all the communities in ways to ensure they understand the eligibility requirements for subprojects. PMU and Staff provide support with Island Council to complete eligibility INTAFF to confirm vulnerability criteria NES and PMU confirm ESS requirements and within Tier 1 or Tier 2	INTAFF, TMO and NES to support Contract Inspector to view homeowner buildings, community group buildings	The schedule will be outlined in the Implementation plan Annex that is the responsibility of the PMU	No of Subproject applications for Component 2 Tier 1 and Tier 2 disaggregated into female or male homeowners or head of households No of subproject for communities No. of subprojects for Tier 2 Communities demonstrate their	

Proposed Project Activities	Identified risks	Risk Level ⁵	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost ***
	during implementation of subprojects and in particular the community centre upgrades and community water tanks		Activities to improve health and safety include site demarcation, community notification, safe material storage, and traffic/pedestrian management during works.			Emergency Management Systems developed and understood Health and safety site and material storage systems during works Annual assessments and mid-term evaluations will ensure compliance with pollution prevention and resource efficiency measures	
Improvements to Sanitation upgrades	Likely to be requiring Tier 2 mitigation with removal of gravel and ground disturbance Waste systems need to ensure that there is appropriate drainage and does not leave	2-3	Sanitation upgrades to be overseen by NES officer to ensure all conditions are met Nature based solutions will be promoted on upgraded sanitation systems and replanting of fruit or banana trees close to sanitation systems promoted as a means to	NES officer Island and PMU ESS officers	Annual Tutaka programme to check on upgrades and for any seepage Promotion of Planting	No. of Sanitation systems installed by island are operating efficiently Tutaka reports show no issues with sanitation systems	

Proposed Project Activities	Identified risks	Risk Level ⁵	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost ***
	room for mosquito breeding grounds to form		ensure that septic drains and surrounding water are reduced Removal of old concrete will be a priority and included as part of the waste stream recycling program or grounded for road fill.		programmes on an annual basis	PMU Annual reports confirm number of sanitation systems upgraded.	
Water system upgrades water tank replacements or repairs	Likely to be requiring Tier 2 mitigation Removal of old water tanks and replacement of new tanks – ensuring adequate enclosed areas to prevent exposure of water bodies to potential breeding grounds for mosquitos	2-3	Water tanks will require careful removal – large and likely difficult to complete without appropriate machinery. Household tanks requires adequate areas for placement close to roof catchment. Large Plastic will require to be sawn to small piece and package for removal off island Concrete tanks can be broken up into smaller pieces for roading materials or other foundation purposes	PMU, NES and ICI	As per Annual implementation Plan	Newly installed and operating Water Tanks No of tanks Total number of beneficiaries disaggregated receiving more water Increased water resilience on each island – No of litres installed on each island to be recorded and reported	

Proposed Project Activities	Identified risks	Risk Level ⁵	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost ***
	Supply Chain Issues Reducing GHG emissions reducing transport costs	1 - 3	Supply Chain will only be from countries who have ratified the ILO Forced Labour Convention 1930 (No. 29) and the Abolition of Forced Labour Convention, 1957 (No. 105). Cook Islands has a robust procurement Policy All purchases will be bulk purchased via MFEM and therefore controlling supply of materials for all sub-projects and bulk shipping to Pa Enea MFEM will also confirm all shipping arrangements for delivery of materials to Pa Enea	- Trade Contractor - Island Construction workers MFEM and PMU	Prior to subproject installation	Supply chain issues managed and resolved early by MFEM Number of shipments is reduced with better planning Implementation Plan shows no delays in expected completion dates for delivery	NA

Proposed Project Activities	Identified risks	Risk Level ⁵	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost ***
	Potential for women to be inequitably treated or disadvantaged during decision making and employment opportunities. Some might see that the criteria are unfair No transparency in how the grants is allocated	1 - 3	Any potential of gender inequality to be identified in Gender assessment and mitigated with Gender Action Plan. GRM will be formalised to report incidence or inequitable treatment and complaints and or grievances. Procedures for reporting, and when and how these grievances will be managed. Regular communication on GRM procedures to stakeholders and beneficiaries carried out	Accredited Entity PMU PTI Gender Specialist,	Employment notice that women may apply for positions is clearly stated in all EDA job vacancies	Gender balance in employment of men and women and disaggregated number included in quarterly reports. 100% of island Councils staff and councillors understand and are aware of SEAH. Quarterly Reports will show no. of women employed and if any grievances are reported and resolved	NA
Monitoring and Reporting							
Regular Reporting on implementation of ESAP	Lack of qualified personnel for regular monitoring and reporting Personnel fail to follow and understand policy	1 - 3	Update Quarterly report implementation of ESAP	Accredited Entity M&E Specialist PTI Gender Specialist PMU	Prior to implementation and signed FAA	GCF accept reports and mitigation of risks Reports confirm little or no impact on project	NA

Proposed Project Activities	Identified risks	Risk Level ⁵	Mitigation Measures	Responsible party/person	Schedule	Expected results	Cost ***
	procedures for GRM and SEAH				Quarterly reporting status of ESS Action Plan as per Implementation Plan	implementation and all according to annual implementation timetable.	

*** Costs for the ESAP have been included in the overall budgets for Project Management Unit and for Trade Contractors who will undertake the supervision and implementation of the sub-project

J. INTEGRATION OF ESS MANAGEMENT

86. MFEM as the AE and BCI as the Executing Entities (EE's), are responsible for ensuring that the requirements of this ESAP are fully integrated into the project. The MFEM (AE) and BCI as EE will:
- ensure that all relevant implementing parties Central Agencies (ICI, NES, MIA, TMO) Island Councils are sensitized on aspects of the plan and receive appropriate training to fulfil their individual environmental and social responsibilities;
 - Ensure that the necessary resources and skills are retained to successfully carry out all mitigation measures
 - Ensure that the Project Manager will have relevant environmental and social safeguard experience and risk management
 - Formally monitor and report on the environmental and social performances of all activities will be supported by the Monitoring Officer who will work in the PMU and support technical staff in sub-activity screening and monitoring ESAP implementation.
 - Require ESS screening of all activities prior to implementation of sub activities and approval of the screening from the Accredited Entity
 - Require that implementing parties manage their environmental and social performance in line with this ESAP.
 - The AE will also coordinate the Project Management Unit (PMU) to: Continually monitor and report as needed issues related to social and environmental risk
 - Raise awareness amongst target communities on this ESAP and the project Grievance Redress Mechanism (GRM).
87. The ESAP shall form part of any procurement documentation and Terms of Reference (TOR), and it shall be the AE's responsibility to ensure that all procurement documents and contractual specifications are subject to review against this ESAP to ensure that all appropriate safeguard measures are captured at the bid stage and in all contracts.
88. It is further the responsibility of the AE to ensure that this ESAP is considered in review of any TOR for Technical Assistance developed for the Project. The safeguard requirements for any design or supervision of the Project will be fully integrated into TOR to ensure that all safeguard responsibilities allocated within the ESAP are realized at the tender stage.
89. In this way, the ESAP will be fully integrated within the Project so that the required measures will be fully appreciated by all responsible parties and successful implementation will be achieved.
90. It is also the responsibility of MFEM as the AE to ensure that this project is aligned and in compliance with the GCF Revised policy on the prevention and protection from sexual exploitation, sexual abuse and sexual harassment (SEAH). The Cook Islands Policy documents that align with SEAH is *The Cook Islands Integrated National Strategic Plan for Sexual and Reproductive Health 2014 – 2018* Priority Area 5 Family planning,

reproductive health and gender-based violence is covered and where the area has one or more goals associated with it, to which specific objectives and activities are attached. This policy clearly outlines a framework for Cook Islands women sexual and reproductive health care needs can be addressed. This theme recognises the specific needs of women and girls in making sexual and reproductive health decisions, and the importance of directing education and interventions to them. Specifically, Goal 5B: Agreed protocols and procedures for service delivery, reporting and referral are in place for cases of gender-based violence and related activities. The services for victims of gender-based violence should be fully integrated into the health programme.

91. The Cook Islands Code of Conduct also aligns with the GCF SEAH Policy, and any infringements are considered serious misconduct.
92. Although most of the objectives and activities of the Integrated National Strategic Plan on Sexual and Reproduction Health are beyond the scope of this project the current framework provides positive signs that Cook Islands is committed to the prevention and protection of women from sexual exploitation, sexual abuse and sexual harassment (SEAH) irrespective of gender.
93. The policy and activities however could provide an appropriate work schedule that would allow for interventions where reporting of harassment and sexual abuse is documented and managed by the Programme Manager and senior TMO staff.
94. *Harassment Act 2017 is the only Act that makes provision for a person who applies for an order under this Act on his or her own behalf if a person harasses another person - For this act the meaning of specified act has the same meaning as stalking in the Family Protection and Support Act 2017. The object of this Act is to provide greater protection to victims of harassment by (a) recognising that behaviour that may appear innocent or trivial when viewed in isolation may amount to harassment when viewed in context and (b) ensuring that there is adequate legal protection for all victims of harassment. The Act aims to achieve its object by (a) Making the most serious types of harassment criminal offences (b) Empowering the court to make restraining orders to protect victims of harassment and (c) Providing effective sanctions for breaches of the criminal and civil law relating to harassment. Both these documents demonstrate a level of commitment by the Cook Islands to ensuring*

K. ENVIRONMENT AND SOCIAL SAFEGUARDS TRAINING

95. The PMU and PCU and the implementing partners will require training to ensure effective implementation and oversight of the ESAP including further ESS screening of sub-activities if required.
96. Areas recommended for training and have been included in the ESAP:
 - GCF ESS policies in particular areas requiring further screening - sub-activities using TVP ESS screening as well
 - Roles and responsibilities of different key agencies in social safeguards implementation
 - Health and Safety requirements for physical works

- Island Emergency Preparedness Procedures
- How to effectively integrate the ESAP into project management, implementation, monitoring and reporting
- Publicity and Management of the GRM
- SEAH awareness
- How to facilitate meaningful participatory planning of community consultations

L. ESAP ROLES AND RESPONSIBILITIES

97. Details of the roles assigned to the various agencies and organisations are summarised below and outlined in the Figure 2 EDA Facility Implementation Arrangements

Accredited Entity

98. The Ministry of Finance and Economic Management is the AE for this project and provides support to the Executing. MFEM is fully responsible (legally and financially) for the implementation of this project including the safeguard standards required by the GCF. The AE:
- Acts as a focal point for communications with the GCF on project related matters:
 - Ensures compliance with GCF funding requirements, including safeguard compliance
 - Provide capacity building trainings to EEs in the application, screening and monitoring of environmental and social safeguards, including GRM and SEAH trainings.
 - Provide additional technical capacity to the EEs where required
 - Updating the ESAP as necessary to reflect changes in the designs
 - Ensure that GCF project activities are screened and assigned appropriate environmental and social risk categories and that the environmental and social risks and impact are properly and sufficiently assessed.
 - Ensure that measures to avoid minimize or mitigate adverse impacts are planned and adequately supported in GCF project activities.
 - Ensure that every GCF-funded project implements and makes publicly available to all a grievance redress mechanism
 - Ensures every GCF funded project complies with the GCF Information Disclosure Policy
 - Ensure that the GCF ESP for each project design supports meaningful and inclusive multi-stakeholder consultation and engagement through the lifecycle of activities
 - Ensure cooperation with GCF in its due diligence of the activities proposed for GCF funding.

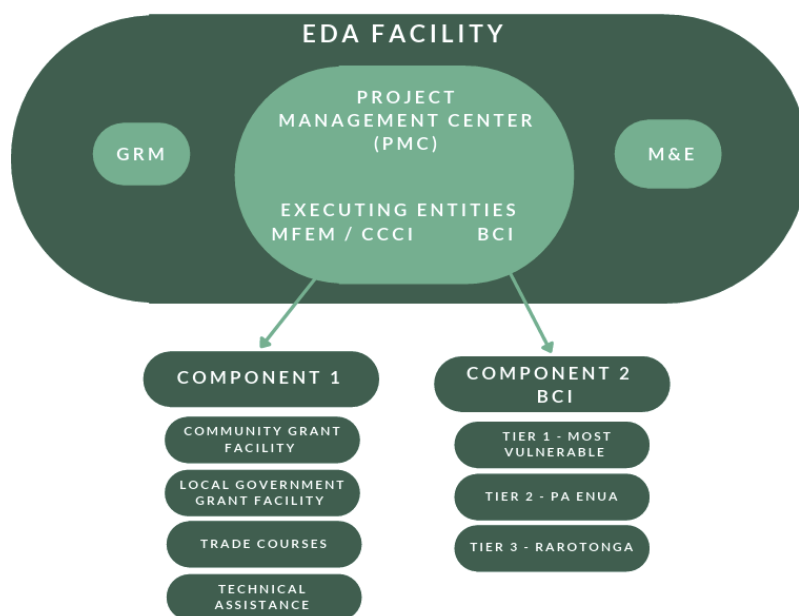


Figure 3 Implementation Arrangements

Project Management Units

99. Project Management Unit will manage the daily operations of the project, staffed by a Facility Manager, Fund Managers, and assistants. PMU will manage the day-to-day operations, staffed by a project manager, assistant, procurement specialist and those who will be located in the Pa Enua that will support implementation.
100. As the Accredited Entity The **Ministry of Finance and Economic Management** (MFEM) will establish a project management unit which will responsible for the overall implementation of the project
101. The **Climate Change Cook Islands** office (CCCI) was established in 2011 as part of the Office of the Prime Minister (OPM). The main role of the CCCI is to coordinate and implement climate change related activities in an integrated manner. The CCCI office has an oversight role of all climate change activities to ensure coordination of the multi-sectoral approach to climate change.
102. The coordination role ensures alignment of the various climate change activities with the Cook Islands national climate change goals. The CCCI Office can also make sure that there is no duplication across the project and across GCF portfolio developments and facilitate activities for issues that may not have been addressed.
103. CCCI will be responsible for the implementation of component 1 and the administration of window 1 EDA Facility in close collaboration with MFEM, to achieve success of the project objectives and goal.
104. **Bank of the Cook Islands** (BCI) has now been accredited to the Green Climate Fund for on-lending and blending and has been identified as the executing entity for Window 2, which involves a mechanism designed to blend grants with revolving reimbursable grants to the private sector for climate change adaptation BCI operates throughout the Cook Islands (Figure 3) and provides finance in the areas of (but not limited to):

agriculture, fishing, pearls, tourism, transport, investment property, housing, consumer, micro and business finance.



Figure 4 BCI operations in the Cook Islands

105. BCI has also applied to be a Delivery Partner for the GCF Readiness Support Programme and has received FMCA endorsement enabling their Delivery Partner status.
106. Through the accreditation process, BCI has established policies specifically aligned to the GCF criteria including BCI's Environmental and Social Risk Policy Framework. The E&S Policy sets out BCI's Environmental and Social Management System and BCI's approach to effecting sound social and environmental risk management in the Projects it finances. Additionally, BCI's Sustainable Finance Framework outlines BCI's green banking facilities and the principles including environmental and social standards and safeguards the Bank is to apply to the projects it finances.
107. BCI is the only bank with a branch network established in the Pa Enua of the Cook Islands, reaching those most vulnerable to the impacts of climate change as identified in the diagram above. Accordingly, BCI is well placed to support resilience through climate finance enabling a post pandemic green Cook Islands recovery.

Implementing Partner Organisations

108. All implementing partners, contractors and consultants are required to comply with the ESAP, MFEM ESSF and the GCF ESP. they will be required to work with the PMU to ensure meaningful community and stakeholder engagement in their work programmes and plans
109. Cook Islands Tertiary Training Institute. Delivery of informal and formal climate change courses to the communities and public.
110. National Environment Service (NES) will support all ESS and ESAP activities to ensure that the sub project activity complies with ESS risks and will NOT go beyond GCF Category C or NES ESD Tier 2. Further detail for NES is provided in the Feasibility Study.
111. Window 1 is mandated to provide grant awards for Community and Local Governments response to climate change.
112. Window 2 is mandated to provide blended finance for climate outcomes in private buildings through a 3-tiered approach. It is structured with an investment plan with a mechanism to establish a revolving fund ensuring sustainability after the GCF's investment

113. A key feature of the project is decentralized and tailored assistance that will be provided as TA under Component 1, which will include contracting 6 Climate Focal Points to be located across the Pa Enua islands. The Climate Focal Points will be responsible for liaising with stakeholders and communities and undertaking / supporting the screening of sub-project grants.
114. The Grant Award Evaluation Committee²⁰ (GAEC) will make funding decisions and will be responsible for
- fiduciary and administrative due diligence,
 - technical evaluations, and
 - environmental and social safeguard compliance.
115. The Committee is chaired by the Director of the Development Coordination Division in MFEM and is composed of staff from the MFEM, Office of the Prime Minister (OPM), Infrastructure Cook Islands, National Environment Service, Ministry of Internal Affairs, Ministry of Health, Ministry of Culture and the Bank of the Cook Islands (BCI). For the project, the Committee will include external experts and stakeholders, such as:
- Infrastructure Cook Islands (building permitting) engineers and experts as needed
 - Gender interest groups (e.g. CI Business & Professional Women)
 - Civil society (for grants awarded under window 1)

M. ENVIRONMENTAL AND SOCIAL ACTION PLAN IMPLEMENTATION AND MONITORING

116. ESAP monitoring reporting will follow the GCF Monitoring and Accountability Framework (MAF) for Accredited Entities¹ and MFEM Environmental and Social Safeguard Framework (ESSF) Quarterly reports (3 quarterly reports to replace 3 monthly reports) for quarters one (January to March), two (April to June) and three (July to September). Quarter two report shall include the six-monthly GAP³ (Gender Action Plan) and Environmental and Social Safeguards Action Plan (ESAP) report.
117. Annual project implementation review report⁴ (annual report to replace 1 quarterly report the annual report shall include the annual GAP and ESAP report. MFEM will use this annual report for preparing and submitting annual performance reports (APRs) to GCF, including annual audited financial reports with MFEM supervising the independent external auditor.
118. Project completion report (project completion report to replace last annual project implementation review report).
119. These activity reports will be fully developed by an international monitoring and evaluation (M&E) consultant which must provide adequate information against the results framework (theory of change) considering means of verification of project specific indicators involving primary and secondary data collection, analysis, and reporting and relevant stakeholders in line with GCF MAF, Integrated Results Management Framework (IRMF) and Evaluation Policy.
120. This will help to gauge whether the project is proceeding as planned, and to make good management decisions. In addition, the M&E consultant will train and guide the PMU project staff particularly the

monitoring officer, who will implement the internal monitoring and reporting system, and the gender/safeguards specialist who will ensure GAP indicators are included in the MAF.

121. MFEM shall supervise the mid-term and final evaluations. The mid-term evaluation shall be conducted in the middle of Year 3 (i.e., month 30) with, procurement for an independent external firm shall commence in month 27 to enable the mid-term evaluation to be completed by month 33. The final evaluation shall be conducted starting in the last quarter of Year 5 (i.e., month 59). These evaluations should also assess the performance of the funded activity against the GCF investment framework criteria, including financial/economic performances as part of the project efficiency and effectiveness criterion.
122. All EDA monitoring and reporting including ESS reporting are required to use templates developed under the EDA project. All reporting will be quarterly including GCF annual performance reports. The ESS Standard Screen template that will be used for sub-activity ESS screening during implementation is provided as **Appendix 2** of the Report. Project Manager/Project Coordinator and National Monitoring Officer with the International Gender Safeguard Specialist will be responsible for monitoring the project and reporting compliance. This will include:
 - Outcomes of any additional ESS screening or assessments
 - Status of management measures of the ESAP and whether they are being implemented effectively
 - Summary of any community consultations
 - Summary of any grievances received under the GRM
 - Monitoring of Expected results
 - Ongoing monitoring requirements for Septic Tank installations during annual Tutaka programme carried out by Te Marae Ora – Ministry of Health
123. Evaluations enable knowledge sharing of experiences and lessons learnt to help make decisions that improve the quality of activities for the second half of the project or any scale-up opportunities, inform government policies, strategies and increase the effectiveness of development initiatives in the Cook Islands. It also provides accountability and transparency to stakeholders and on cross-cutting issues like gender and safeguarding. These evaluations should also assess the performance of the funded activity against the GCF investment framework criteria, including financial/economic performances as part of the project efficiency and effectiveness criterion.

N. GENDER MAINSTREAMING

124. EDA project design recognizes the need to mainstream gender into management plans. Annex 8 Gender Assessment and Gender Action Plan addresses gender sensitizing activities to ensure GCF Gender Policy requirements are met.”

O. Grievance Redress Mechanism

125. The Ministry of Finance and Economic management is committed to observing the highest ethical legal and moral standard in any project the Ministry implements, coordinates or funds. The Public, beneficiaries and stakeholders can confidentially report fraud, corruption or any standards outlined in the MFEM environmental and social safeguard framework. Under a GCF readiness programme, MFEM has undertaken

workshops and developed a platform to ensure the public, beneficiaries and stakeholders are aware of MFEMs GRM policy and procedures and their rights to bring forward any grievances related to projects that MFEM implements or coordinates.

126. There are three channels of grievance mechanism that will apply to this project.

- EDA – Project level Grievance Mechanism with the PMU
- MFEM – Institutional Level Grievance Redress Mechanism
- GCF – Independent Redress Mechanism
- Any Parties wishing to raise grievances caused by or associated with the EDA project will be able to do so.

127. The project will use the established and operational complaints procedure of MFEM, which is publicly available on its website (<https://www.mfem.gov.ck/development/national-systems/grants-award-system#grant-complaints-process>). A member of the public fills out a complaints form, which can cover environmental, social, financial and administrative complaints. This form will be collated by PMU and DCD categorizes the complaint, shares it with the relevant evaluation team, tracks the process and communicates the outcome to the complainant.

128. To strengthen the accessibility and inclusivity of the EDA Facility, the GRM will

- Ensure language accessibility – information on the GRM process, rights, and available support will be available in English and Cook Islands Maori (including dialects where possible) in both written and verbal formats:
- Provide multiple intake points – grievances may be submitted in person at the AE offices, EE offices (Rarotonga and Pa Enua), through the island focal points and activity contract managers, via email, through dedicated phone/SMS numbers, or online through the GRM forms.
- Guarantee Pa Enua Coverage – the GRM process will be promoted and explained in Rarotonga and the Pa Enua, during the campaign events under Activity 1.1.1, during the CfP rounds, during subproject implementation. Intake points will be identified and made available locally to ensure grievances do not need to travel to Rarotonga to raise a grievance.
- Maintain confidentiality and survivor centered handling – all grievances, especially those relating to GBV or SEAH will be treated with strict confidentiality, with PTI engaged for survivor support and case management where relevant

129. SEAH matters for GRM will be managed by Punanga Turuturu Itivaine (PTI). MFEM has a MOU with PTI to cover all matters relating to gender-based violence (GBV) and SEAH for any MFEM climate financed projects. PTI has funding in the project to manage GBV and SEAH awareness raising, training and any grievances. Any grievances outside this will be managed by the PMU

Stage	Process	Approx. duration
1	Any affected person, island elected or traditional chief, or other concerned party takes grievance to PMU.	Any time

Stage	Process	Approx. duration
2	Project Manager or other project specialist reviews and finds solution to the problem in consultation with island elected or traditional chief and relevant agencies.	2 weeks
3	Project Manager, ESS or Gender Specialist reports back an outcome to affected person who submitted the grievance	1 week
If unresolved or not satisfied with the outcome at PMU level or has received no report in the allotted time period		
4	Affected person takes grievance through Island Council or CINCW, to MFEM	Within 2 weeks of receipt of decision in step 3
5	MFEM reviews and finds a solution which may include recommendation of dispute resolution, including an appropriate body to oversee	4 weeks
6	MFEM reports back to the affected person who made the complaint	1 week
If unresolved or at any stage if concerned party is not satisfied		
Affected party can take the matter to Office of the Ombudsperson or appropriate court		As per Office of the Ombudsperson or judicial system

Table 5 Grievance Redress Process

Process for EDA Project level GRM

130. Concerns, complaints and grievances by affected persons will be directed to the PMU where the Project Manager and Social Safeguard Specialist will be the focal point to receive, record, review, and address concerns in coordination with relevant stakeholders (e.g. Cook Islands National Council of Women (CINCW) depending on the nature of the complaint.
131. A complaints register will be maintained to record the date, details, and nature of each complaint, the name of the complainant, and the date and actions taken as a result of the follow-up investigation. The register will also cross-reference any non-compliance report and/or corrective action report or other relevant documentation relating to the complaint.
132. At the inception workshop, information summarising the GRM process and governance including contact details of the PMU and grievance form will be provided. Table 6 presents the steps and corresponding time frame for the grievance redress mechanism.
133. The process above recognises that there may be changes on who might be involved in hearing the grievance and representation of ethnicities and indigenous people focal point may be required.
134. Grievances, issues and concerns related to SEAH will be managed through this GRM process but will be implemented by PTI with the additional survivor centered measures that will include:
 - The rights, needs and wishes of the survivor or victim is paramount

- Safety of the survivor will always be ensured with potential risks to the survivor identified and action taken to ensure the survivors safety and prevent further harm
 - All actions should reflect the choices of the survivor
 - All information will be confidential, and identities will be protected
 - All actions should reflect the choices of the survivor and the survivor must provide informed consent to progress with each stage of the complaints process.
135. The EDA Project Level GRM does not prevent any affected person from accessing the MFEM institutional level GRM or the GCF Independent Redress Mechanism or seeking redress through the Courts

Whistleblowing Procedure

136. A general whistleblowing procedure (2018) is also in place to protect people who may denounce fraud and corruption concerns anonymously.
137. In accordance with its External Communications Policy, Environmental and Social Safeguard Framework, antifraud and anticorruption policy, MFEM has set up a whistleblowing procedure which directly involves the Cook Islands Audit Office (CIAO), and the Public Expenditure Review Committee (PERC). Hence, any individual who becomes aware of any reprehensible practice related to fraud, corruption, wrongdoing, collusion or any similar act, shall report with all confidentiality to the CIAO, who shall examine and the complaint and refer to the PERC for directions on investigation.
138. This whistleblowing procedure is also aligned to the Cook Islands Government Whistleblowing Policy, Cook Islands Government Financial Policies and Procedures Manual, Cook Islands Government Procurement Policy, and Public Expenditure and Review Committee and Audit Act 1995

Appendix 1 GCF Environmental and Social Screening Checklist

Part A: Risk Factors.

Please indicate your answers to the questions below and provide an explanation on the response selected. In cases when the TBD response has been selected, please explain briefly why you are not able to determine now and when in the project cycle the question will be addressed.

If the criteria are not applicable to the project you may write N/A in the justification box.

Risk Factors	YES	NO
Will the activities involve associated facilities and require further due diligence of such associated facilities?	☐	☒
<i>Please provide a justification of your answer:</i> <i>No associated facilities will be required during the project; all sub project activities under components 1 and 2 will take place in-situ within the footprint of existing facilities. Relatedly, all proposed renovations will be carried out within the footprint of existing homes, households and existing Government and/or community buildings. The proposed sub project activities are conceptualized to not require Resource Consent or Environmental Permits/Consents (which are stipulated for activities with 'significant environmental impact'); as such, restricting programmatic activities to those categories that do not incur such consenting requirements aligns with GCF's 'minimal environmental and social risks and impacts' designation. However, it is recognised that National Environment Service will provide additional screening of sub-projects to ensure all risks have been assessed and will be mitigated during implementation.</i>		
Will the activities involve trans-boundary impacts including those that would require further due diligence and notification to affected states?	☐	☒
<i>Please provide a justification of your answer:</i> <i>Cook Islands is an island nation and has no terrestrial boundaries</i>		
Will the activities adversely affect working conditions and health and safety of workers or potentially employ vulnerable categories of workers including women and children?	☐	☒
<i>Please provide a justification of your answer:</i> <i>There are no expected adverse impacts on workers; the employment of children is proscribed under the Employment Relations Act 2012 and Cook Islands' ratifications of ILO Conventions. Executing entities, implementing partners and contracts will be required to comply with the Cook Islands National Occupation Health and safety standards and procedures; please see the ESAP.</i> <i>The role of the Ministry of Internal Affairs (INTAFF) is that of the primary government agency with responsibility for Occupational Safety and Health (OSH) Standards, which are governed by The Draft 2019 Cook Islands OSH Policy; (formal enactment of relevant policy and legislation was interrupted by COVID, but are</i>		

Risk Factors	YES	NO
addressed via Cook Islands' ratifications of ILO C029, C105, and C182 et al. Public Service Commission OSH Policy has been in effect since January 2016 and requires all government agencies to establish and maintain a safe and healthy work environment for employees, contractors and visitors and this will be enforced during the implementation of this project. CIIC Draft OSH policy is currently under review but is broadly provided for via the aforementioned ratified and In Force ILO conventions. All risks related to employment will be overseen by INTAFF employees residing in the Pa Enua. Spot checks to ensure that all labour laws are being complied with, encouraging employment of women and where possible 50% of those subcontracted on Pa Enua will be women. Early gender and SEAH training will also ensure that any risks associated with SEAH will be identified and mitigated.		
Will the activities potentially generate hazardous waste and pollutants including pesticides and contaminate lands that would require further studies on management, minimization and control and compliance to the country and applicable international environmental quality standards?	☐	☒
Please provide a justification of your answer: The project will not generate hazardous waste or pollutants. In relevant cases, e.g. new materials or removal of old materials the trade contractor who is responsible for implementing the sub-projects will be required to ensure correct disposal of waste in an environmentally friendly way. Such conditions will be included in the successful supplier's contract. Additionally, the National Environment Service (NES) waste management function is primarily to prevent, control and correct the pollution of air, water, and land. NES is also responsible to ensure environmentally safe disposal of toxic chemicals and wastes. Key sections of the Environment Act (EA) 2003 relate to the management and disposal of waste. Most of the activities will be undertaken in the Pa Enua and Section 11 of the Act establishes Island Environment Authority (IEA) on each island and it is this body that will enforce the EA. Including Part 7 that relates to control of waste including appointment of Environment Officers to issue notices requiring occupiers of private land to clear litter and to ensure that Cook Islands waters and inland waters are not being polluted by toxic or chemical waste that may harm the environment. Hence, both operational and regulatory bodies already exist to address any wastes generated. Furthermore, the concept stage was developed using the Tarai Vaka Process (Cook Islands Activity Management System), which has confirmed that there will be no hazardous waste generated; waste that cannot be disposed of on the Pa Enua will be transhipped to Rarotonga to be disposed of, per existing Environment Service protocol. The management system includes an Environmental and Social Safeguards Framework (ESSF), wherein all environmental and social risks and impacts of a project must be identified as part of the environmental and social assessment conducted in accordance with ESSF. This project was assessed as Category C Minimal or no adverse impacts and no further action is required. ESAP has identified various products that may be reused or recycled on island.		

Risk Factors	YES	NO
Will the activities involve the construction, maintenance, and rehabilitation of critical infrastructure (like dams, water impoundments, coastal and riverbank infrastructure) that would require further technical assessment and safety studies?	☐	☒
<i>Please provide a justification of your answer:</i> <i>As with the issue of associated facilities, all activities will take place in-situ within the footprint of existing facilities – The homeowners property which is clearly defined with boundaries and site plans. Relatedly, all proposed renovations will be carried out within the footprint of existing homes, households, government or community buildings. No construction, maintenance, or rehabilitation of critical infrastructure such as dams, water impoundments, coastal and riverbank infrastructure is proposed under this project.</i>		
Will the proposed activities potentially involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities?	☐	☒
<i>Please provide a justification of your answer:</i> <i>None of these apply to the project locations / all physical or economic works will be undertaken in government owned land and buildings or private homes and households</i> <i>No further land acquisition is expected and therefore there will be no involuntary resettlement required.</i>		
Will the activities be located in or in the vicinity of protected areas and areas of ecological significance including critical habitats, key biodiversity areas and internationally recognized conservation sites?	☐	☒
<i>Please provide a justification of your answer:</i> <i>All activities will be located within the current footprint of existing buildings and will not impinge or have any impact on protected areas and or critical habitats.</i> <i>The homeowners boundaries and site plans will be identified in the grant application agreements where the EDA activities will occur and homes or buildings have not been identified as being in critical habitats, key biodiversity areas and internationally recognized conservation sites in the Cook Islands</i>		
Will the activities affect indigenous peoples that would require further due diligence, free, prior and informed consent (FPIC) and documentation of development plans?	☐	☒
<i>Please provide a justification of your answer:</i> <i>Under the UN working definition of indigenous peoples, no differentiable indigenous sub-groups exist in the Cook Islands. However, traditional people and communities within the Cook Islands have been engaged, consulted and contributed to the development of this project. Indigenous definition is included in the ESS Para</i>		

Risk Factors	YES	NO
18 – 21		
Will the activities be located in areas that are considered to have archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values or contains features considered as critical cultural heritage?	☐	☒
<i>Please provide a justification of your answer: N/A</i> <i>As noted earlier, the project will be on existing sites and the project will have no impact on any cultural or religious sites.</i>		

Part B: Specific environmental and social risks and impacts

Assessment and Management of Environmental and Social Risks and Impacts	YES	NO	TBD
Has the E&S risk category of the project been provided in the concept note?	☐	☒	
<i>Tarai Vaka Activity Process - Cook Islands Management System has shown the project to be 'Category C' with minimal or no adverse impacts.</i>			
Has the rationale for the categorization of the project been provided in the relevant sections of the concept note? <i>The rationale for the project has been provided in all areas required in the project. Relevant Cook Islands legislation, policies, and agency protocols have been referenced/linked where appropriate. International conventions to which Cook Islands is a signatory have also been referenced/linked.</i>			
Are there any additional environmental, health and safety requirements under the national laws and regulations and relevant international treaties and agreements?	☐	☒	☐
<i>Please provide a justification of your answer:</i> <i>The project has low level of in-situ upgrades proposed, all of which is to take place on existing sites; All sub-project activities will conform to existing provisions for environmental, health, and safety protections under the Public Health Act, the Environment Act, draft National Occupational Safety and Health Policy, and other relevant legislation, policies and procedures. All additional Environmental laws and safety requirements have been included in Part A above.</i>			
Are the identification of risks and impacts based on recent or up-to-date information?	☒	☐	☐
<i>Please provide a justification of your answer:</i> <i>This proposal contains information from an initial risk and impact assessment which is based on the latest</i>			

<i>available information. The extensive consultation processes engaged in as part of the pre-feasibility study established communication channels and feedback mechanisms to ensure that risk and impact identifications are current.</i>			
Labour and Working Conditions	YES	NO	TBD
Will the activities potentially have impacts on the working conditions, particularly the terms of employment, worker's organization, non-discrimination, equal opportunity, child labour, and forced labour of direct, contracted and third-party workers?		☒	☐
<i>Please provide a justification of your answer:</i> <i>The AE (as a government agency) is required to ensure that this project is in compliance with the Cook Islands Employment Relations Act, Cook Islands Government Procurement Policy, Office of the Public Service Commissioner Employment policies and procedures and the Cook Islands occupational health and safety policy. The project includes low in-situ upgrades, otherwise the emphasis is on institutional capacity building and prevention of health impacts. However, and measure and actions have been inserted under the labour and working conditions in the ESAP</i> <i>Labour and Working Conditions are governed by the Cook Islands Employment Relations Act 2012 which are monitored by the Ministry of Internal Affairs as well as the Public Service Act 2009, Public Health Act 2004. The AE and EEs will be responsible for ensuring compliance with all these Acts. It will be the responsibility of the Ministry of Internal Affairs (INTAFF) employee on the Pa Enua Islands to monitor employment contracts, relations and conditions.</i>			
Will the activities pose occupational health and safety risks to workers including supply chain workers?	☐	☒	☐
<i>Please provide a justification of your answer:</i> <i>The project has low level in-situ upgrades proposed, all of which is to take place in-situ; the project's primary emphasis is on institutional capacity-building and training to upskill communities to understand the requirements of the 2019 Building Code. The AE will also ensure that agencies/ executing entities are briefed and undertake training on occupational health and safety standards now identified in the ESAP</i> <i>The project is not expected to pose occupational health and safety risks during implementation – all laws relating to labour and working conditions in the Cook Islands will be monitored and enforced by the AE and EEs with the support of INTAFF staff on the Pa Enua. The AE who is responsible for bulk procurement will ensure that any supply chain inputs for building materials come from countries who have ratified the ILO Forced Labour Convention 1930 (No. 29) and the Abolition of Forced Labour Convention, 1957 (No. 105).</i>			
Resource Efficiency and Pollution Prevention	YES	NO	TBD
Will the activities generate (1) emissions to air; (2) discharges to water; (3) activity-related greenhouse	☐	☒	☐

gas (GHG) emissions, (4) noise and vibration; and (5) wastes?			
<i>Please provide a justification of your answer:</i> <i>The project has a low level of construction proposed, all of which is to take place in-situ; This is an adaptation project and will have low level, if any GHG emissions, discharges to water, noise and vibration and wastes – this project will improve the homes and buildings on the islands.</i> Sanitation upgrades is likely to require further assessment and post installation is proposed with the Ministry of Health Tutaka community programme that inspects household and community areas. Specific programmes will be established post implementation which is at a minimum an annual inspection. The process of ensuring this activity is part of the Ministry of Health Annual reporting programme will need to be confirmed. Island Councils could play an additional role with Ministry of Health staff that includes checking on infrastructure as well as any water leakages that might be monitored and corrective action taken on a monthly basis or when required.			
Will the activities utilize significant amount of natural resources including water and energy?	☐	☒	☐
<i>Please provide a justification of your answer:</i> <i>The project has a low level of upgrades proposed, all of which is to take place in-situ; no sub-project activities are expected to require significant amounts of water or energy</i> <i>Given all Pa Enua island and all sub-project activities are considered insignificant. Similarly, water resource usage for proposed activities are low.</i>			
Will there be a need to develop detailed measures to reduce pollution and promote sustainable use of resources?	☐	☒	☐
<i>Please provide a justification of your answer:</i> <i>All activities will promote the sustainable use of resources; no air or water pollution is expected as a consequence of project implementation. Indeed, the proposed adaptation measures are <u>reasonably expected to result in pollution reduction co-benefits</u> -project activities endeavour to achieve pollution reduction and sustainable resource use promotion and where necessary packaging of waste to be disposed of on Rarotonga.</i>			
Community Health, Safety, and Security	YES	NO	TBD
Will the activities potentially generate risks and impacts to the health and safety of the affected communities?	☐	☒	☐
<i>Please provide a justification of your answer:</i> <i>Quite the inverse, the project's objective is to reduce health and safety risks for surrounding communities. As with the aforementioned pollution reduction co-benefits, climate adaptation and mitigation efforts are correlated with improvements in health and safety gains for impacted communities. Homes will be safer and</i>			

<i>healthier for homeowners and community buildings safe havens during future extreme climate events.</i>			
Will there be a need for an emergency preparedness and response plan that also outlines how the affected communities will be assisted in times of emergency?	☐	☒	☐
<i>Please provide a justification of your answer:</i> <i>Each island also has Island Emergency Plans developed in collaboration with the Emergency Management Cook Islands Office. The project activities as such do not require further response planning, while there is an activity focused on disaster preparedness for local communities. However, we inserted measures and actions into the ESAP to ensure that all those involved with the implementation of the project are aware and trained on the relevant islands' emergency action plans.</i> <i>All project activities are low risk and emergency preparedness and response plan in the affected communities have noted any likely risks in the plans and mitigation measures have been identified.</i> <i>Industry best practices and standard operating procedures of the executing entity will be applied to all project activities, these include first aid training, occupational health and safety standards and training</i>			
Will there be risks posed by the security arrangements and potential conflicts at the project site to the workers and affected community?	☐	☒	☐
<i>Please provide a justification of your answer:</i> <i>Not relevant to this project as all projects will be carried out in- situ of homeowners or community buildings. Relevant arrangements will be made for roof repairs and removal of old roofing and specific site security arrangements will be the responsibility of the Trade Contractor.</i>			
Land Acquisition and Involuntary Resettlement	YES	NO	TBD
Will the activities likely involve land acquisition and/or physical or economic displacement?	☐	☒	☐
<i>Please provide a justification of your answer:</i> <i>No land acquisition is foreseen – grant applications are for those who are the homeowners of existing buildings they want to improve.</i> <i>As stated earlier the project inputs are within the footprint of the current buildings and therefore there is no requirement to acquire further land; therefore, there will be no physical or economic displacement.</i>			
Biodiversity Conservation and Sustainable Management of Living Natural Resources	YES	NO	TBD
Will the activities potentially introduce invasive alien species of flora and fauna affecting the biodiversity of the area?	☐	☒	☐
<i>Please provide a justification of your answer:</i>			

<i>The project does not involve any flora or fauna and will not have biodiversity impacts. This is part of the exclusion's list in the ESAP.</i>			
Will the activities have potential impacts on or be dependent on ecosystem services including production of living natural resources (e.g. agriculture, livestock, fisheries, forestry)?	☐	☒	☐
<i>Please provide a justification of your answer:</i> <i>There are no foreseen adverse impacts on ecosystem services. In fact, the project will enhance all other sectors including agricultural sector because safe homes will improve community willingness to extend their efforts in other areas.</i> <i>The potential co-benefit is the improvement of sanitation systems for homeowners and therefore improving surrounding ecosystems with encouragement from NES to implement nature based solutions alongside sanitation improvements.</i>			
Indigenous Peoples	YES	NO	TBD
Will the activities potentially have any indirect impacts on indigenous peoples, ethnic minorities, or vulnerable and marginalized groups?	☐	☒	☐
<i>Please provide a justification of your answer:</i> <i>Window 1 Tier 1 of the EDA Grant Fund will support vulnerable homeowners who lack the funds and ability to improve their homes to comply with 2019 Building code to receive a 100% grant. The fund will provide opportunities for all other resident Cook Islanders who are homeowners to apply for grant funding during the open and transparent Call for Proposals (CfP) to be carried out. The assessment criteria which will include gender, vulnerability and location of buildings will determine who will be eligible for the grant.</i>			
Cultural Heritage	Yes	NO	TBD
Will the activities restrict access to the cultural heritage sites and properties?	☐	☒	☐
<i>Please provide a justification of your answer:</i> <i>The project will not restrict access to any heritage sites or properties – it will not have any impact on cultural heritage sites and properties as it relates to only homeowners or community buildings.</i>			
Will there be a need to prepare a chance-find procedure in case of the discovery of cultural heritage assets?	☐	☒	☐
<i>Please provide a justification of your answer:</i> <i>This is not going to be the case as the activities will not be sited on undisturbed locations where undiscovered cultural heritage assets might be located. The sites for EDA are already existing buildings and existing built</i>			

<i>homes.</i>			
Stakeholder engagement and grievance	Yes	NO	TBD
Will the activities include a continuing stakeholder engagement process and a grievance redress mechanism and integrated into the management/implementation plans?	☒	☐	☐
<i>Please provide a justification of your answer:</i> <i>A stakeholder's engagement plan has been completed and is included in the Feasibility Study Chapter 12</i> <i>The Accredited entity as part of its policies also requires all projects to ensure compliance with its external communications procedures and establish a project level GRM which is now included in Chapter N of the ESS which are part of the project management activities. Grievance Redress Mechanism has been included in is addressed from Para 101 - 106 of the ESS.</i>			

Part C: Sign Off

Sign-off: <i>Tessa Vaetoru – MFEM ESS Officer</i>
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Appendix 2 GCF - SEAH Risk Screening Checklist

Ensuring basic risk mitigation measures are in place ahead of stakeholder engagement	Responsibility	Comments
Does the AE have a SEAH Policy (or SEAH provisions in another policy)?	AE	No. however SEAH provisions are covered in other policies and legislation. Such as the Cook Islands government Public Service Code of Conduct, which aligns with the GCF SEAH Policy and any infringements are considered serious misconduct. Provisions are also contained in the following legislations Cook Islands Harassment Act 2017 and the Family Protection and Support Act 2017
If the AE has contracted out stakeholder consultations, does that entity have a SEAH Policy (or are they contractually bound to apply the AE's)?	AE/Consultant	Stakeholder consultations are the responsibility of the AE and EES. However, all contractors and consultants who are required to interact or engage with stakeholders are contractually bound to apply the AE's and GCFs policies. These are covered in the contracts and Terms and Conditions of all contracts under all GCF projects and programmes
Does the AE have an employee Code of Conduct?	AE	Yes, the AE has a code of conduct.
If the AE has contracted out stakeholder consultations, does that entity have an employee Code of Conduct (or are they contractually bound to apply the AE's)?	AE/Consultant	All contractors are required and bound to the AEs policies
Have AE employees and consultants conducting stakeholder consultations been trained on preventing SEAH and the Code of Conduct?	AE/Consultant	AE staff have been trained on SEAH matters as well as the code of conduct. The AE also organizes regular trainings for project staff on these policies and EEs are also trained to brief all mission staff on these matters before any missions to the Pa Enua
Does the AE have a grievance mechanism in place in case of early SEAH complaints from stakeholder engagement?	AE	Yes. The AE has a GRM in place. In addition, the AE has also engaged a local women's NGO to provided SEAH support should there be any grievances raised at project level or institutional level and assist with the GRM handling. They provide a survivor centric approach when assisting with any such cases

Does the AE have a specialist on staff who can undertake the more advanced assessment in Stage 4 as well as deal with early SEAH? complaints if they arise; and if not, does the AE require budget and /or assistance with this?	AE	The AE have staff who have undergone advanced GRM training, however any SEAH matters are handled with care by the Punanga Turuturu Itivaine who provide the specialized support to the applicants.
Contextual Level (and Baseline Conditions)	Reference	Comments
Does the country have laws prohibiting sexual harassment / stalking generally?	National Legislation (Cook Islands harassment Act) Cook	Yes
Do labor laws prohibit sexual harassment in the workplace?	National Legislation. • Cook Islands constitution. • Cook Islands Employment Relations Act 2012. • Cook Islands Harassment Act 2017. • Cook Islands Disability Act.	Yes, the following laws contain provisions relating to harassment and nondiscrimination, while mostly broadly covered. The Cook Islands employment relations act serves as the main legal framework for employment in the cook islands. The Public Service Code of Conduct and prohibits sexual harassment in the workplace
Does the country have laws prohibiting intimate partner violence (IPV)?	National/State law (Gender Assessment)	Crimes (Sexual Offences) Amendment Act 2023 criminalized rape within marriage and strengthened protections for survivors of sexual violence.
What is the prevalence of GBV in the country?	National statistics (Gender Assessment)	2014 Family Health & Safety study revealed that 33% of women aged 15-64 experienced sexual and/or physical violence from an intimate partner in their lifetime. ⁶
What is the legal age a person can marry?	National Legislation. • Cook Islands Marriage Act 1973	Legal age to marry is 16 years old for both male and females. However parental consented is required if either party is under the age of 21. Marriage under 16 is not permitted by law

Despite any laws, what is the prevalence of child marriage in the country?	National statistics – Vital statistics and Population Estimates	NA
What is the income level of the country?	World Bank ranking (H, HM, M, LM, L)	N/A Cook Islands is not a world bank member.
Where does the country rank on global gender indices?	World Bank Reports / Other	N/A the Cook Islands is not included in Global Gender Indices. However available local and regional data reveal strengthens and challenges: women in the Cook Islands are making strong gains in business leadership. Women directors in the cook islands rose from 32% in 2021 to 40% in 2024, exceeding the 2023 global average of 23%. Women CEOs increased from 27% to 29% compared to 20% in the pacific region and 6% globally. Boards with gender parity jumped from 17% to 38% during the same period. 15% of Chairpersons are women and women hold 7 out of 24 parliamentary seats (29%)
Is there a national action plan on GBV and/or sexual harassment?	National government	No. however the Cook Islands Gender Equality and Women's Empowerment Action plan contains provisions on eliminating violence against women. In addition, the Cook Islands has also made a commitment under the Nairobi Summit on ICPD25 to achieve zero sexual and gender-based violence by 2030
Does the country have specialized services for survivors of GBV (at both the national and local level) including women's shelters, adequate medical facilities and facilities which provide psycho-social support?	Local gov / NGOs	PTI has a national office located on Rarotonga near the Tupapa Health clinic. PTI has employed an ex female police officer who provides confidential support. PTI provides 6x free counselling sessions with qualified counsellors and has safe housing available. PTI supports gender-based violence cases with a 24 hour free line. This free support line can be used by all islands. Though PTI does

		not have an office in the outer islands, PTI has signed memorandum of understandings with the Cook Islands Police as well as with Te Marae Ora (Cook Islands hospital) to ensure our people receive urgent medical assistance and support on the mainland and in the outer islands. PTI regularly conducts gender-based violence awareness programs and is currently funding a full legislative review and as a first of it's kind has funded 5x scholarships in counselling.
Is the country currently experiencing war, internal conflict or humanitarian disaster?		NO
Project Level Risks	Responsibility	Comments
Are women concentrated in lower paid roles and mostly line-managed and supervised by men?	AE	NO. Women in the Cook Islands are broadly represented across sectors and pay scales, and are not concentrated in lower-paid roles. Leadership and supervisory roles are increasingly occupied by women, reflecting ongoing progress in gender equality.
Are piece-rate systems or other performance- related pay structures used where individuals are in control of how much other workers get paid?	AE	There is no widespread system where individual employees control other workers' pay through piece-rate or performance-related mechanisms; pay is typically managed at the organizational or managerial level.
Will project workers have control over life- changing resources such as the allocation of compensation for displacement or access to basic or highly sought-after resources?	AE	Project workers do not have discretionary control over critical resources; decisions are made through structured, transparent, and accountable processes.

Will security personnel be used? Will they be armed?	AE	Use of security personnel: Yes, security personnel may be employed to ensure the safety of project sites, staff, and assets. Armed status: No, security personnel will not be armed. Carrying firearms in the Cook Islands is not allowed under national law.
Will there be an influx of male workers into the project area (as opposed to only using local labor)?	AE	The project will primarily rely on local labor, but there may be a small influx of male workers from outside the project area / island if specialized skills are required that are not available locally. - Local employment focus: The project prioritizes engaging community members to ensure benefits remain within the local population. - Gender balance considerations: Both men and women from the local workforce will be employed according to project needs and skill requirements.
Are local communities poor and lacking basic resources?	AE	While some remote areas may have limited access to certain services, local communities generally have the basic resources they need and are not broadly classified as poor.
Will migrant workers be employed by the project, especially those who may not speak the local language? Will they be employed on a temporary or daily basis?	AE	the project will mainly employ local workers, prioritizing capacity-building, with language considerations taken into account given different Māori dialects, and presence of migrant workers in project implementation is unlikely
Will project workers all have formal contracts?		Yes, all project workers will have formal contracts.

		• Contract terms: The contracts will include drop-down clauses from the (FAA) and the (AMA) of the AE, applying relevant covenants from the GCF. • Binding policies: The terms and conditions also bind project workers to the AE's policies, ensuring compliance with organizational and donor requirements. • Onboarding and training: The AE has a structured onboarding process, and all project workers are required to complete regular trainings before beginning work to ensure they understand their roles, responsibilities, and compliance obligations, these include Code of Conduct, whistle blowing, GRM, GENDER and SEAH Trainings
Will goods frequently be transported over long distances, especially through poor and/or remote communities?	AE	Yes, goods will be transported over long distances as the Cook Islands are vastly spread across approximately 200 million square kilometers of ocean. • Remote communities: Many project sites are located on remote islands, requiring careful logistics planning to ensure timely and safe delivery of materials. • Transportation considerations: The project will account for challenges such as limited transport options, weather conditions, and high costs

		associated with moving goods to isolated locations.
Are worksites or project activities based in remote locations? Will worksites be spread out, with isolated spaces?	AE	Yes, project worksites and activities will be based in remote locations. • Geographic spread: The Cook Islands consist of 15 islands spread across 200 million square kilometers of ocean, so project sites may be widely dispersed. • Isolation considerations: Some worksites may be isolated, requiring additional planning for logistics, communication, and worker safety. • Implementation approach: The project will ensure that adequate support, transport, and safety measures are in place for workers at these remote and isolated sites.
Will project workers live in the community or in worker housing? If in worker housing, is it mixed sex?	AE	Project workers will live in worker housing, which will be separated by sex. • Standard practice: This arrangement is normal practice in the Cook Islands and aligns with local cultural norms. • Policy compliance: The separation of housing by sex is also part of the project's policies, ensuring the safety, privacy, and comfort of all workers.
Will workers be required to travel long and potentially unsafe distances, and at	AE	Yes, workers may be required to travel long distances, including by ship to remote islands that do not have airports.

times of day when transport options may be limited?		• Safety measures: All vessels used for transport will meet the sea safety standards required by the Cook Islands Ministry of Transport, ensuring safe travel for project workers. • Transport planning: The project will plan schedules to minimize risks associated with limited transport options, weather conditions, and travel times.
Will the project operate in highly pressurized work environments, with tight seasonal deadlines?	AE	Yes, the project may operate in highly pressurised work environments, particularly as workers are required to complete necessary works before the cyclone season, which typically ranges from November to March. • Seasonal deadlines: Work schedules may be tight to ensure all critical activities are completed safely before severe weather. • Risk management: This has been taken into account during the design of the project, and the call for proposal rounds are structured to mitigate these risks.
Is the project located within a male-dominated sector where female workers will be employed?	AE	Yes, the project includes subprojects related to trade and infrastructure, which are traditionally male-dominated sectors. • Female employment: Women will be employed in these subprojects, and measures will be taken to ensure equal opportunities, safe working

		conditions, and supportive work environments.
Have communities, especially low income/ vulnerable communities, voluntarily raised concerns in relation to SEAH/GBV during consultations?	AE	No SEAH/GBV concerns have been raised to date, with ongoing measures in place to ensure community voices are heard.
Have any changes been made to project design or adaptive management undertaken due to	AE	Yes, the entire design of this project has been developed in close collaboration with stakeholders, with every aspect taking into consideration the issues, challenges, and successes they have raised.
Concerns from Stakeholders or communities (if yes work through checklist again)	AE	No concerns raised by stakeholders or communities

Checklist of Potential SEAH Risk Mitigation Measures

Mitigation	Comments
POLICY AND CODE OF CONDUCT	
Does the AE have a SEAH policy which covers the project?	No, however there are other provisions contained in policies that cover SEAH and GBV matters which will be applied to the project and all project staff will be bound by these provisions and contained within each of their contracts.
Does the project have a Code of Conduct prohibiting SEAH by workers?	Yes, as described above
Are clauses included in procurement contracts which commit contractors, subcontractors, suppliers, drivers and security personnel (if applicable) to adhere to the AE Code of Conduct (or EE equivalent)?	Yes. All procurement documentation contains specific requirements for potential suppliers to adhere to and cover in their Bids. In addition, all policies of the AE will be adhered to and contained in contracts.
SUPERVISION AND TRAINING	
(For larger, longer-term projects) Is there a trained SEAH specialist in the project team?	Yes. The AE has a partner to undertake awareness raising, sensitization and trainings relating to SEAH And GBV matters
Does the project plan to train all project workers on the Code of Conduct, SEAH and what is prohibited behaviour?	Yes, this is part of the AEs role and responsibility and organizes regular trainings will all project workers to undertake trainings on code of conduct, whistleblowing, GRM, GBV and SEAH
RECRUITMENT AND PERFORMANCE ASSESSMENT	
Are recruitment procedures in place, with interview panels staffed by at least two people?	Yes
Are candidates' identities checked at interview and are references requested?	Yes
Are all workers required to be hired on formal contracts?	Yes

Are written procedures in place for performance appraisals, promotions, and any performance-related pay increases (if applicable)?	Yes
GRIEVANCE REDRESS MECHANISMS (GRM)	
Does the project have a GRM for community members to raise SEAH-related complaints and concerns and is it confidential and survivor-centred, with multiple reporting channels?	Yes
Does the project have a GRM for project workers to raise SEAH-related complaints and concerns and is it confidential and survivor-centred, with multiple reporting channels?	Yes
Are the staff who manage the GRMs equipped and trained to respond to SEAH reports in a safe and effective way?	Yes
Are persons, communities and countries affected or potentially affected by the activities consulted and that effective SEAH GRMs to receive complaints and feedback are established and function in a collaborative manner and in a way that is complementary to GCF independent Redress Mechanism, and requiring that any gaps or weaknesses be addressed?	Yes, there is awareness raising and training component that is specific for GBV and SEAH matters.
Are affected communities (or likely to be affected, by the GCF-financed activities) informed about SEAH GRMs at all three levels – at the earliest opportunity of the stakeholder engagement process and in an understandable format and in all relevant languages?	Yes, this has been undertaken during the design of the project during consultations with stakeholders and also included as part of the project.
INVESTIGATION AND RESPONSE	
Are there written procedures for dealing with SEAH complaints or concerns and a dedicated and trained female staff member to deal with these (if no specialist is available)?	Yes, this is covered in the MOU with PTI and MFEM
Has a service provider mapping been undertaken to identify which services are available for survivors of	NO, as we have a GRM partner that handles and

SEAH?	provides these services
If there are no public or private service providers in the area, has the project identified and budgeted for outside providers?	N/A
AWARENESS RAISING	
Will/have gender-sensitive and culturally appropriate outreach materials been prepared (such as posters, signage, etc.) on SEAH in all relevant languages?	Yes these are part of the project activities
Has the community been informed about potential SEAH risks for the project and how to prevent them and use the GRM?	Yes, covered during consultations and will be further addressed during project implementation. This builds on other GCF readiness project activities which have been raising awareness of such mechanisms
Have any rapid mobile surveys or text surveys been developed to regularly obtain feedback from workers and/or the community?	No, however these are included as part of the project activities for M&E
PROCUREMENT AND PARTNERSHIP	
Have SEAH prohibitions and mitigation measures been included in procurement documents?	Yes, prohibition measures have been included in procurement documents.
Are there clauses in the EE contract requiring them to prohibit SEAH in their workforce?	A Formal subsidiary agreement will be entered into between the AE and the EE to ensure that they prohibit SEAH in their workforce. However their policies and procedures already address many SEAH matters.
PHYSICAL WORKSPACE	

Will separate facilities for men and women be provided at all work sites?	Yes
Are SEAH risks included in workplace safety assessments, including worker accommodation and transportation?	Yes
Are project workers informed of areas that are off-limits, for example areas around schools (or other places where children are present)?	Yes

Appendix 3 EDA Sub-Project Environmental Screening Assessment

This form outlines the on-site checklist for Environmental, Social, Labour, and SEAH (Sexual Exploitation, Abuse, and Harassment) risks, completed during Stage 3 of the Call for Proposals (CfP).

Project Scope

The screening begins with the following required information:

- *Subproject Applicant - Full Name*
- *Location (Island, Village, Tapere)*
- *Subproject scope: Reroof/Roof Tie-downs, Window shutters/Water Tank/Septic Tank*
- *GIS Coordinates (Lat/Long)*
- *Dwelling Asset Number (GEOportal / ArcGIS, If Applicable)*
- *Date of Screening*
- *Screened by (Name and Position)*

Eligibility / Exclusion List

If the answer is “Yes” to any of the following questions, the subproject is ineligible for EDA funding:

1. *Does the Subproject Involve any of the following activities?*
 - *Activities listed on the MFEM Exclusion List?*
 - *Works in or directly impacting legally protected cultural signs or sacred areas (marae)?*
 - *Activities that require involuntary resettlement or result in permanent loss of livelihoods?*
 - *NO, the subproject does not involve any of the above activities.*

Location Sensitivities

Site and Building Sensitivities:

2. *Does the building or site have any sensitivities that need to be considered during implementation?*
 - *Building is within or adjacent to a heritage, protected, or environmentally sensitive site?*
 - *Building is exposed to natural hazards (flood, cyclone, tsunami, coastal inundation)?*
 - *Works will require temporary relocation of residents or significant access restrictions?*
 - *Works could impact nearby water sources, community gardens, or critical infrastructure?*
 - *Other*

Labour & OHS Measures

Are there any site-specific risks, hazards, or considerations that need to be addressed before contractors begin work?

1. *Physical hazards: Are there site hazards such as uneven ground, open trenches, debris, loose building materials, or overhead work that could put workers at risk?*
2. *Access & surroundings: Are there risks from nearby activities or limited site access, such as rough terrain, public access, livestock, or other construction nearby?*
3. *Utilities & services: Are there any water, electrical, or gas lines, septic systems, or other services that need marking or protection before work begins?*

Gender & SEAH Risks

Ensure that construction or implementation activities do not expose homeowners, applicants, or local communities to Gender-Based Violence (GBV) or Sexual Exploitation, Abuse, and Harassment (SEAH).

1. *Household / Applicant Vulnerability: Are there any individuals in the household who may be particularly vulnerable to GBV/SEAH?*
 - Women
 - Children
 - Elderly
 - Persons with disabilities
 - Others (specify)
 - None Identified
2. *Community SEAH Risk: are there any known risks in your village/community that could put people at risk of sexual exploitation, abuses or harassment (SEAH)?*
 - Yes
 - No
 - Unknown
3. *Community Social Dynamics and power imbalances: are there cultural or social norms in your village/community that may increase risks for women, children or other vulnerable groups?*
 - Yes
 - No
 - Unknown
4. *Community Awareness / Preparedness: Are residents aware of project activities and potential risks?*
 - Yes (partially informed)
 - No
 - Yes (well informed)
 - Unknown
5. *Community Awareness / Preparedness: Do households feel safe raising concerns if they experience or witness inappropriate behavior?*
 - Yes
 - No

APPENDIX 4 EDA Subproject SEAH Screening Checklist

Draft SEAH Risk Screening Checklist

Risk Factor	Screening Question	Response	Risk Level	Notes / Justification
Project Scale & Type	Is the sub-project small-scale, community-based, with no large camps or extended worker-community separation?	Yes	Low	Works are in-situ within villages/pa enua communities; no major separation between workers and their families.
Workforce Composition	Will the project involve significant influx of non-local workers (e.g., from Rarotonga or overseas)?	No	Low	Preference will be given to local Cook Islands-based contractors and labourers;
Workforce Accommodation	Will there be worker camps or temporary on-site accommodation?	No	Low	Workers will commute daily from their homes or family residences; no temporary camps will be established.
Community Vulnerability	Are vulnerable groups (e.g., women, children, persons with disabilities, outer island residents) likely to be in close contact with workers?	Limited	Low	Worksites are small and open; interactions will be short and mostly supervised. Local workers are known to the community.
Gender Dynamics	Is there a high risk of gender-based violence or harassment linked to worker-community interactions?	No	Low	Strong cultural values and community oversight; all workers required to sign a Code of Conduct explicitly prohibiting harassment or exploitation.
Cultural & Social Norms	Are there existing social tensions or disputes that could increase SEAH risk?	No	Low	Project planning includes engagement with local island councils, traditional leaders (ariki, mataiapo, rangatira), and

Risk Factor	Screening Question	Response	Risk Level	Notes / Justification
				women's groups to ensure community acceptance.
Grievance Mechanism	Is there a culturally appropriate, accessible, confidential channel for SEAH complaints?	Yes	Low	Grievance channels include confidential in-person reporting via Punanga Turuturu Iti Vaine, phone/text hotline, and email; survivor safety and dignity prioritised
Contractor	Do contractors have training, policies, and Codes of Conduct addressing SEAH?	Yes	Low	Contractors required to attend pre-start briefing on SEAH, sign Code of Conduct.