
CODE OF ENVIRONMENTAL AND SOCIAL PRACTICE – CONSTRUCTION OF PILOT TOILET OPTIONS

Introduction

The South Tarawa Sanitation Project aims to significantly improve access to sanitation in selected areas of South Tarawa, Kiribati, while also strengthening relevant institutions. Its primary goal is to enhance sanitation facilities and practices, thereby improving public health and environmental conditions. The project focuses on enhancing sanitation access and liquid waste management in the 3Bs area and beyond, which includes expanding the sewerage system and implementing on-site sanitation solutions. Key components of the project involve operational and maintenance improvements, institutional strengthening, community engagement, and effective project management, including support for the Project Management Unit and hiring consultants for successful delivery.

As part of this initiative, the sanitation pilot program has been transitioned to the South Tarawa Sanitation Project by the Ministry of Infrastructure and Sustainable Energy (MISE). This pilot aims to assess the viability of on-site sanitation systems for communities lacking centralized sewerage infrastructure, gather data to inform design and implementation, and enhance understanding of the environmental and social risks associated with the project. Expected outcomes include building community resilience to climate change, preventing groundwater pollution, promoting water reuse, and developing a comprehensive design manual for on-site systems tailored to the unique conditions of Kiribati.

The project is initially planned for the KAP III villages, where water and electricity services are consistently available, although it may extend beyond these areas. Following a mission in June 2024, MISE selected Abarao as the pilot village for the sanitation initiative, which will also incorporate the

Blue-Green Development Initiative. The pilot will test 16 design options, including four communal toilets and twelve household toilets, each with different designs. Further details on the types of on-site septic tanks to be used can be found in Appendix 2.

To avoid and minimise potential adverse impacts to the environment and community during construction of the Pilot Toilets, all contractors and their workers will be required to implement this Environmental and Social Code of Practice. The PMU E&S team will routinely observe, monitor and provide support where necessary to ensure full compliance. KFSU may audit site works or records at any time to confirm compliance and support with any corrective actions. The ESCOP will form part of the bid documents and contract for the Contractor. The Contractor is required to keep records of compliance for auditing purposes.

	Environmental and Social Issues	Action Code	Mitigation actions to prevent negative impacts	Responsible institution	Monitoring PMU-Report/Inspection of Compliance
01	Site Clearance	0101	Only start work once the agreement has been signed and the occupiers and landowners have been informed at least 7 days in advance that work will start.	Contractor	
		0102	Avoid removal of trees, fences and pig pens as much as possible.	Contractor	Daily
		0103	If removal activity is required a. Consult with the owner of the property before removing the properties and trees	Contractor/ STSP PMU/KFSU	As needed/ before construction

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			<p>and provide compensation as per the Kiribati Government rate – liaise with the PMU Safeguards to acquire this document</p> <p>b. replant the trees including fruits trees, medicinal trees and shade trees in a suitable location on the property as required by the landowner and occupier.</p> <p>c. put back the fence, the pig pens as they were in a very considerable manner in a suitable location on the property as required by the landowner and occupier.</p> <p>d. Landowners and occupiers may contribute labor to dismantle or move their structures/plants/animal pens.</p> <p>e. Keep records for inspection.</p>		
		0104	<p>Stop any activity if cultural heritage sites are uncovered such as graves and/or human remains or any other buried artefacts. Follow Chance Find Procedures and contact relevant authorities (for instance the Ministry of Culture and Internal Affairs for cultural</p> <p>Chance find procedures will be used as</p>	Contractor/ STSP PMU/MCIA	As needed/immediate

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			<p>follows:</p> <ul style="list-style-type: none"> • (a) Stop the earthworks, construction or land clearing activities in the chance find. • (b) Delineate the discovered site or area. • (c) Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities and the relevant Ministry take over. • (d) Notify the supervisory Engineer who in turn will notify the responsible local authorities and the relevant Ministry immediately. • (e) Responsible local authorities and the relevant Ministry would oversee protecting and preserving the site before deciding on subsequent appropriate procedures. • (f) Decisions on how to handle the findings shall be taken by the responsible authorities and the relevant Ministry. 		

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			<ul style="list-style-type: none"> • (g) Implementation for the authority's decision concerning the management of the findings shall be communicated in writing by the relevant Ministry; and • (h) Construction work could resume only after permission is given from the responsible local authorities and the relevant Ministry concerning safeguarding of the heritage. 		
02	Property/Utility Damage	0201	Avoid disturbance of existing assets including pig pens, water wells, crops have been built, planted or established on land near or intersect with the site	Contractor/STSP PMU/KFSU/ PUB	Weekly
		0202	Obtain plan from the Public Utility Board showing the locations of water pipes and electricity wires to avoid damaging them and avoiding worker electrocution.		Pre-construction
		0203	Use the most suitable machinery for low risks and impact outcome, especially where access is narrow/limited.		Daily during works
03	Noise disturbance	0301	Consult the land occupiers and neighbours regarding hours of work and when you may be	Contractor/STSP	Monthly

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.	e		making noise (power tools, excavating, demolishing structures etc.)	PMU/Council	
		0302	Use noise-control methods (barriers/ shelter/ muffling devices)	Contractor	Weekly
04	-Air pollution due to construction activities	0401	Do not burn debris or waste materials	Contractor	Daily
		0402	Reduce dust generation through application of water where practical (as a potential result of construction and especially during dry weather season) Schedule for water spraying at sites and damping access roads	Contractor/ STSP PMU/MELAD	Daily (especially dry seasons)
		0403	Use the dust screen to protect residents and the communities from any expected and unexpected dust emission from the construction	Contractor	Weekly Daily
		0404	Cover stockpiled materials and secure debris with tarpaulins		
		0405	Limit heavy vehicle movements and idling		Daily

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0 5	Soil Erosion and groundw ater and stormwat er pollution control	0501	Identify hazardous materials to be handled only by qualified or appropriately trained persons	Contractor /STSP /KFSU MELAD	Pre- construction
		0502	Limit ground disturbance to and minimize removal of trees and plants.		Weekly
		0503	Stabilize cleared area before construction as appropriate		Daily
		0504	Avoid construction on unstable soils		Weekly
		0505	Do not cause any discharge of any stormwater over or near seawalls or natural coastal features where water could cause instability or erosion.		Weekly
		0506	Construct proper drainage systems to capture stormwater for reuse and / or divert stormwater away from activity sites and other sensitive environments.		
		0507	Stop any activity that is causing excessive erosion and turbidity		
		0508	Natural drainage flows should not be altered or changed		Weekly
		0509	Proper Storage & Spill Management <ul style="list-style-type: none"> • Store liquid hazardous materials in 		Pre- construction

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			<p>designated, labelled, and banded areas.</p> <ul style="list-style-type: none"> Regularly inspect containers for leaks or damage. <p>Spill Response:</p> <ol style="list-style-type: none"> Contain: Stop the source and prevent spreading. Absorb: Cover spill with sand, mix thoroughly. Collect & Dispose: Shovel into a bag and dispose of in a hazardous waste landfill. Clean & Report: Clean the area and notify the site supervisor. <p>Contractor Note: Follow this procedure strictly to prevent safety hazards and environmental contamination.</p>		
		0511	Construct proper drainage systems to cope with stormwater during and after construction (to avoid surface flooding)		weekly
		0512	Keep waste and hazardous materials under shelter and away from any risk of contaminating ponding surface water or groundwater.		Weekly

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06	Waste (solid and hazardous) management	0601	Do not discharge any solid or liquid waste into land, groundwater, ponded surface water or coastal environment. All liquid waste should be discharged to the PUB sewer network. All solid waste should be disposed of in landfill.	Contractor/STSP/PMU/MELAD	Daily
		0601	Manage construction waste to avoid impacts		daily
		0603	Hazardous materials handled with protective equipment by trained people only, and stored in a locked container, under cover from weather.		Daily
		0604	Waste management plan - wastes to be recycled/reused where possible to be deserted at the wasteland		Weekly
		0605	Indicate hazards through signs, pictures and labels		Weekly
		00606	Proper storage of hazard liquid substance for prevention of oil spill		Daily
07	Visual	0701	Remove all waste and ensure the site is clean of waste and debris before closing the job.	Contractor/STSP/MELAD	Post-construction
08	Aggregates (if imported)	0801	Follow proper Pest Control for importation of materials. Keep records of importation and fumigation.	CONTRACTOR/STSP/PMU	Post construction

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09 Community and worker safety		0901	The Code of Conduct will be signed by all workers and records kept for inspection. -	CONTRACTOR/STSP	Monthly
		0902	Induction on risks and obligations for Gender Based Violence, Sexual Exploitation, Abuse, Harassment and Violence against Children with relevant stakeholders including the Ministry of Women Youth Sports and Social Affairs, and the Ministry of Employment and Human Resource	Contractor/STSP PMU	Post construction
		0903	Consult with the immediate neighbours, beneficiaries of the toilets and the landowners and occupiers before undertaking any inspections and physical work. At least 7 days' notice is required before any physical work can start. Communicate awareness of dangers on site and requirements to keep safe.		Before activities
		0904	Contain mixing area for cement to avoid spillage and contamination of surrounding environment		Weekly
		0905	Keep extra materials stockpiled in a safe place undercover, away from walkways		
		0906	No workers under 18 to be engaged in any project activities including major and minor activities.		Before activities
		0907	No forced labor is allowed by both contractors		Weekly

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			and subcontractors		
		0908	The site must be secured after each working day with barriers and signs to stop people from entering. Hazards such as trenches and holes must be stabilized and barriers put in place to stop people from falling in them. Rebar should have caps on the top to stop impalement.		daily
10	Protocol for work vehicles	1001	<p>During the mobilization of construction materials, the project vehicles should follow the following protocols.</p> <ul style="list-style-type: none"> (a) Ensure that the main road remains clear for normal traffic flow (b) Work vehicle must be parked beside the road and/or within the designated construction area (c) Work vehicles must not block the shared access road for other vehicles and pedestrians/community members (d) Place bright or visible safety cones around the work vehicle to clearly indicate that it is part of the construction project 	Contractor	Preconstruction
1	Improper	1101	Removal of all building debris. Excavation	contractor	Post-

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1	closure of construction sites		procedures such as controlled excavation and stockpiling- removal of all building debris and land reinstated		construction
1 2	Occupational health and safety at work site	1201	Prepare and implement a construction health and safety management plan and the contractor should retain a trained occupational health and safety officer or a safeguard officer to be responsible for overall safeguard activities of the construction activities.	Contractor/ STSP/PMU	Preconstruction Daily
1202		A risk register, listing hazards and mitigation measures, shall be maintained and implemented for the duration of work. The register should be checked and updated at least weekly or when a new risk is identified.	Weekly		
1203		All workers to be trained in their task. Drivers have the required license for the class of vehicle.	Monthly		
1204		A first aid kit is available on site and there is a vehicle available to take workers to hospital if an accident happens. The site foreperson has the contact details of the ambulance. All incidents and near misses are reported to the	Monthly		

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			PMU.		
		1205	All workers have personal protective equipment relevant to their role and the risks on site.		Weekly
		1206	Use temporary barriers and cones to keep workers safe from falls/trips and other hazards.		Weekly
		1207	Provide toilets and drinking water for workers.		Weekly
13	Social Impact	1301	Ensure outside workers respect the code of conduct for construction activities in the community through briefing session in relation to National Legislations and policies applied to both National and International Workers and the requirements of the Code of Conduct.	STSP PMU/Contractor	Daily and when needed or when required
		1302	Ensure construction does not conflict with any person's livelihood, including pigs / chickens, shops, stalls etc.		
		1303	Identify and engage a community member with key responsibilities for project implementation if necessarily		

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		1304	Grievances resolve using the STSP grievance redress mechanism; however, the contractor is to appoint a designated person as a focal point of contact to receive grievances, complaints, comments and feedback from the community. Complaints may be received by any form (txt, in person etc.) and all complaints must be made. All complaints must be reported to PMU weekly.		

Annex 1

The following Code of Conduct (COC) must be read and understood by all managers, workers and contractors being engaged under the STSP:

I, *individuals name*, acknowledge that adhering to the provisions as detailed in this COC and following any of the Project's Environmental, Social or Health (ESH) or Occupation Health and Safety (OHS) provisions is important.

The Client considers that failure to follow the COC, EHS or OHS standards, be it in an office, on a work site, office and work site surroundings, at workers' camps, in worker's homes, or the surrounding communities - constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment.

I agree that while working on the Project I will:

1. If undertaking work related travel to Kiribati or within Kiribati will complete a Travel Safety Plan.
2. Attend and actively participate in any induction or training required for OHS or sexual harassment and GBV (Gender Based Violence), as requested by my employer.
3. Will wear my personal protective equipment (PPE) at all times when required at project work sites or engaged in project related activities where PPE may be required.
4. Implement any OHS on-site requirements.
5. Not drink alcohol or use narcotics (including kava) or other substances which can impair faculties and potentially cause incidents, before or during work activities.
6. Consent to a Police background check if required.
7. Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
8. Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
9. Not engage in sexual harassment—for instance, making unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behaviour (e.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody's sex life; etc.).
10. Not engage in sexual favours—for instance, making promises or favourable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behaviour.
11. Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defence. Consent from the child is also not a defence or excuse.

12. Unless there is the full consent¹ by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this COC.
13. Report to my manager any suspected or actual GBV or VAC (Violence against Children) by a fellow worker, whether employed by my company or not, or any breaches of this COC.

With regard to children under the age of 18:

14. Wherever possible, ensure that another adult is present when working in proximity of children.
15. Not to invite unaccompanied children unrelated to my family into my home, or the works site unless they are at immediate risk of injury or in physical danger.
16. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography.
17. Refrain from physical punishment or discipline of children.
18. Refrain from hiring children for domestic or other labour below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.
19. Comply with all relevant local legislation, including labour laws in relation to child labour and World Bank’s E&S policies on child labour and minimum age.

Sanctions

I understand that if I breach this COC, my employer will take disciplinary action which could include:

- a) Informal warning.
- b) Formal warning.
- c) Additional Training.
- d) Loss of up to one week’s salary.
- e) Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
- f) Termination of employment.
- g) Report to the Police if warranted.

I understand that it is my responsibility to ensure that the environmental and social, provisions within the COC are met. That I will adhere to the any additional OHS and EHS management detailed by the Project or the World Bank. I do hereby acknowledge

¹ Consent is defined as the informed choice underlying an individual’s free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defence.

that I have read the aforementioned COC, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to COC and OHS issues. I understand that any action inconsistent with this COC or failure to act mandated by this COC may result in disciplinary action and may affect my ongoing employment.

Signature:

Printed Name: _____

Date: _____

Annex 2

GRM STEPS

The Social Safeguards Specialist (SSS) is responsible for managing the Grievance Redress Mechanism (GRM) for the project and ensuring that all complaints received are resolved and addressed at all levels.

The GRM steps are as follows (also see Figure 1):

Level 1.

- i. A member of the public (Complainant) starts the process through submission of a complaint (grievance)/feedback. All complaints, whether by SMS, email, telephone through hotline, social media, drop-box/letter, or in-person will be received and handled by the SSS.
- ii. The SSS will register the details of the complaint/feedback in the GRM Register (see Annex 4) and provide timely communication to the complainant that the complaint/feedback has been received with a case number.
- iii. The SSS in close coordination with the Project Manager (PM) and the Deputy Project Manager (DPM) will review the complaint/feedback to ensure that the issue raised is relevant to the project. If not relevant to the project, the SSS will communicate to the complainant the reason for ineligibility.
- iv. The type of complaint/feedback will be classified as:
 - A - queries, comments, and suggestions.
 - B - allegation of violation of rights, sexual harassment and abuse, unjust and inequitable decisions/benefit sharing, or non-performance/poor performance of obligations against consultants, contractors, or another dispute.
 - C - allegation of fraud or corruption,
- v. If the complaint/feedback is not relevant to the project, the SSS will communicate to the complainant the reason the matter cannot be address in the GM.
- vi. The SSS **acknowledgment, assessment and communication** are to be sent to the complainant in **writing within two (2) working days using the Standard Letter provided in annex 2.**
- vii. If the complaint/feedback is relevant, The SSS, the PM, the DPM, the Community Engagement Specialist (CES) and the contractor will investigate, attend meetings, address the complaint/feedback, and provide an expedient and effective means of resolution/action. Resolution of complaints should be completed **within fifteen (15) working days**. Investigation of grievances/feedback may involve site visits and consultation with relevant parties (complainant, contractor, and others as relevant). If necessary, the SSS will convene a meeting(s) with the relevant parties, e.g., the contractor, MFED (KFSU Safeguards) and relevant government ministries such as MELAD (for environmental and land issues), the MEHR (for OHS issues), MWYSSA (for social welfare issues)^{2,1} and others who may have specific responsibility related to the

² Including a referral to the Gender Based Violence hotline or service provider, as relevant.

complaint/feedback. Thus, the **Plan of Action** (see annex 3) will be used here for guiding action where the complainant can be consulted and generally to get his or her agreement to the proposed solution for an issue.

- viii. The SSS fulfil a secretariat role in the meeting(s) and coordinate, the CES to take meeting minutes, and monitor the execution of the grievances investigation(s), and actions taken. Further investigations may be required based on the meeting(s) outcome(s).
- ix. Actions to resolve the complaint/feedback will then be taken. After the investigation and action, the SSS will follow-up with the complainant regarding the actions taken to resolve his/her complaint and to ascertain their satisfaction upon resolution of the complaint has been made.
- x. If the complainant is satisfied, the case is considered resolved/closed and the SSS will update the GRM register including details of the grievance/feedback, steps taken and the resolution. If the complainant is not satisfied, the complaint then referred to Level 2.

Level 2

- xi. If the complainant is still dissatisfied with the action(s) or attempts at resolution made at Level 1, the SSS in close coordination with the PM and/or the Deputy will escalate the matter with the Implementing agency's focal point (Secretary or designate- DES), the WB/Project Task Team Leader (TTL), MFED (Secretary or Director of Engineering Service -DES), and the Office of the Attorney General (OAG) for a resolution to be made but without formal legal proceedings. The Grievance Redress Service (GRS) system of the WB may be initiated as appropriate. The SSS will continue their secretariat roles for meetings at this level. Resolution of complaints/feedback should be completed **within thirty (30) working days**.

Others:

If still unresolved, the complainant may opt for judicial/legal proceedings. Meaning, in the event where all avenues have been exhausted within the GRM and GRS system of the WB, and that the complaint remains unresolved without further actions to take, the complaint will be declared closed and referred to the Office of the People's Lawyer (OPL) and that the complainant will be encouraged to take necessary steps for formal legal proceedings in accordance with Kiribati laws and procedures.

Refer to the GRM Flowchart Below for ease reference and information

