United Nations Development Programme

Country/Region/Global: Pacific Region
Project Initiation Plan

Project Title: Strengthening Anticorruption, Transparency and Accountability in Pacific Island Countries ("Pacific Anti-Corruption Project")

Expected Regional and Country Programme Outcome(s): United Nations Pacific Strategy (2018-22) - Outcome 5: By 2022, people and communities in the Pacific will contribute to and benefit from inclusive, informed and transparent decision-making processes, accountable and responsive institutions, and improved access to justice.

UNDP Sub-Regional Project Document - Outcome 5: Effective governance for service delivery

Expected Pacific Sub-Reginal Programme Document (2018-22) Output(s):   Output 5.2. Increased transparency and accountability in governance institutions and formal and informal decision-making processes.

Initiation Plan Start/End Dates: 28 July 2021 to 30 March 2022

Implementing Partners: UNDP

Brief description
Corruption corrodes respect for the rule of law, undermines public service accountability, weakens democratic institutions, leads to human rights violations, distorts markets, erodes the quality of life and sets back overall efforts at sustainable development. Unchecked systematic corruption and impunity has unrecognised bearing on stability and security at community, subnational, national and regional levels. While even in normal situations corruption poses a major impediment to socio-economic development, this effect has been exacerbated due to the COVID-19 pandemic.
Despite the commitments by Pacific Islands Countries (PICs) towards strengthening their governance and ensuring the rule of law, including in relation to implementation of the United Nations Convention against Corruption (UNCAC) and the Sustainable Development Goal (SDG) 16, a number of challenges persist. These challenges relate to the complex and costly processes of transitioning from setting up the basic in-situational and legislative frameworks across all sectors to achieving systemic impact. Specific challenge is the lack of sufficient public sector capacities and resources for detection, prosecution and adjudication of anti-corruption and financial crimes matters. In addition, the exercise of the right to information remains critical to countering corruption, not only in terms of uncovering instances of corruption, but also in terms of promoting overall transparency and accountability of PICs.
The project aims to specifically support institutions, systems, and mechanisms to function more efficiently and effectively to ensure that PICs are able to better prevent and tackle corruption and improve implementation of the Agenda 2030 and SDGs, with focus on SDG 16 targets. To achieve these goals, the project will focus on two key outputs: (i) Key public sector organizations and officials able to systematically implement improved accountability frameworks aimed at tackling corruption through greater transparency and oversight, and (ii) Improved citizens' access to information and

strengthened oversight by non-state actors. Under the first output, the activities will be framed around regional peer-to-peer cooperation and knowledge-sharing; and supporting the capacities of the criminal justice system and other institutions (prosecution, judiciary, financial intelligence units etc) to better detect, investigate and prosecute cases regarding misuse of public moneys and related financial crimes. The activities under the second output will focus on prototyping innovative digital solutions to facilitate pro-active disclosure of government information. This will be complemented by engagement with non-state ac-tors on advocacy and awareness about the values of open data and public information for development purposes.

Programme Period:	2018-2022	
Atlas Project Number:	000135554	
Atlas Output ID:	_____	
Gender Marker:	Gen 2	

Total resources required	**£364,00.00**
Total allocated resources:	**£364,00.00**
• Regular	_____
• Other:	
o Donor (UK)	**£364,00.00**
o Donor	_____
o Government	_____
Unfunded budget:	_0_____
In-kind Contributions	_____

Agreed by UNDP: 10-Jul-2021

Signature: UNDP Fiji MCO Resident Representative: Levan Bouadze

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I.   BACKGROUND

1.   Corruption is a global phenomenon that negatively impacts development. However, more vulnerable countries, such as those in the Pacific, are disproportionately affected. Additionally, while even in normal situations, corruption poses a major impediment to human, economic and security development, this effect is exacerbated due to the COVID-19 pandemic. The lack of sufficient accountability and oversight mechanisms in crisis response and recovery mean that the risks of corruption significantly increase, and these have critical socio-economic implications. Corruption disproportionately affects women who constitute about 50% of the world's poor1. Past studies2 have found that women usually encounter corruption: (i) when accessing basic services, markets and credit, (ii) while engaging in the public space and electoral politics, (iii) in situations of specific vulnerability and human rights abuses notably when accessing remedy for gendered discrimination or violence;

2.   The Sustainable Development Goals which guide development across the world, including in the Pacific region, recognizes that addressing corruption, ensuring accountability and promoting transparency are critical drivers of development. SDG 16 specifically calls upon all countries and stakeholders to: "Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels". SDG 16 specifically underlines that transparent, competent and accountable governance remains a key element towards sustainable development because it helps build public trust in the institutions mandated to serve them (see Figure 1 below). Public institutions must promote and exercise the rule of law, which goes hand-in-hand with their effectiveness, openness, accessibility, and incorruptibility.

Goal 16: Promote just, peaceful and inclusive societies

- Target 16.3: Promote the rule of law at the national and international levels and ensure equal access to justice for all;
- Target 16.4: By 2030, significantly reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime;
- Target 16.5: Substantially reduce corruption and bribery in all their forms
- Target 16.6: Develop effective, accountable and transparent institutions at all levels
- Target 16.10: Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements

3.   The Pacific has long recognized that corruption has been a critical brake on sustainable development. A meta-analysis of PIC UNCAC Review Reports that informed the design of the *UN Pacific Strategy 2018-2022* confirmed that weak governance and corruption are two of the root causes for weak development performances in the region and threaten the 2030 Agenda. National surveys, such as the 2017 National Perception Survey on Peacebuilding in Solomon Islands,[3] and the 2019 UNDP Solomon Islands Conflict and Development Analysis also illustrated prevalent corruption challenges. Moreover, a business survey in PNG consistently identified corruption as the second business constraint (from a list of ten) for doing business in PNG.[4]

4.   The COVID-19 pandemic has escalated the need to ensure that anti-corruption measures protect PICs from the economic damage and other socio-economic harm that new and existing forms of corruption will create. As indicated in the UN report *Fast-tracking the SDGs: Driving Asia-Pacific Transformations*,

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[1] http://blogs.worldbank.org/developmenttalk/no-70-world-s-poor-aren-t-women-doesn-t-mean-poverty-isn-t-sexist

[2] Swedish Cooperative Centre and Vi Agroforestry, Anti-Corruption Policy for SCC and Vi Agroforestry (2008) quoted from Seeing Beyond the State: Grassroots Women's Perspectives on Corruption and Anti-Corruption (UNDP,2012)

[3] UNDP Pacific Office (2018), *UN National Perceptions Survey on Peacebuilding for Solomon Islands*, http://www.pacific.undp.org/ content/pacific/en/home/library/eg/un-national-perceptions-survey-on-peacebuilding-for-soi.html.

[4] Asian Development Bank (2014), *The Challenges of Doing Business in Papua New Guinea*, https://www.adb.org/sites/default/files/ publication/31209/challenges-doing-business-papua-new-guinea.pdf; World Bank (2019), *Doing Business 2020*, https://openknowledge. worldbank.org/bitstream/handle/10986/32436/9781464814402.pdf.

tackling the COVID-19 crisis requires institutional, private sector, international community, and individual resilience to 'build back better'. The report identifies "*Digital transformation, enhanced local governance, increased transparency and anti-corruption measures, the promotion of accountability, strengthened social contracts, greater inclusion and gender equality, and improved access to justice and human rights*" as one of four key building blocks to help improve public service delivery that will be more resilient to address any future crisis. Corruption corrodes the integrity of particular units within governmental administrative organs, and it undermines the whole delivery of government services, quickly degrading their credibility and legitimacy. National anti-corruption strategies are likely to be less effective where corrupt practices exist across the governance pillars, including the executive and its various service providers, the legislature, and the judiciary systems.

5.   The Pacific is also a transit route and increasingly a final destination for the illicit movement of drugs and transnational organized crime, including human trafficking and migrant smuggling. Effective governance systems for fighting corruption that facilitate such activities are instrumental for the region and clearly acknowledged by the Pacific Islands Forum Leaders in the 2018 *Boe Declaration on Regional Security*. The recently adopted Action Plan to implement the Boe Declaration, which is in line with the 2014 Framework for Pacific Regionalism and the Blue Pacific Narrative, clearly highlights corruption as a strategic focus in areas 4 and 6. Area 4 on transnational crime specifically includes action viii to "support regional initiatives and strengthen national efforts to combat corruption by public officials."[5]   Area 6 on creating an enabling environment for implementation including an appropriate coordination mechanism contains area 6 D (iii) on "strengthening of good governance, rule of law and enhancing anti-corruption and electoral processes under the Biketawa Declaration". Some of the measures of success include: "(ii) Number of Member Countries that adopt and implement constitutional, statutory and/or policy guarantees for public access to information; (iii) Number of Member Countries that have anti-corruption legislation; (iv) Number of Member Countries that have an established independent anti-corruption institution."[6]

6.   While the region faces considerable ongoing corruption challenges, nonetheless it must be recognised that there has been considerable action at national and regional levels to address corruption over the last 15 years. Every Pacific Islands country except Tonga has now ratified the UN Convention against Corruption (UNCAC), which first came into force in 2005. Some PICs have also developed specific National Anti-Corruption Strategies (NACS) which are intended to provide guidance to all public servants, as well as the private sector and community more broadly, on how the government intends to address corruption through a comprehensive, multi-stakeholder, time-bound plan.   Already, PNG, Solomon Islands and Kiribati have developed and are implementing their own NACS. Fiji, Solomon Islands and Papua New Guinea have all set up Independent Commissions Against Corruption (ICACs).

Table 1: Key national anti-corruption commitments & institutions				
State party	Ratification, Accession (a)	National Anti-Corruption Committee	National Anti-Corruption Strategy	Independent Commission Against Corruption
Cook Islands	17 October 2011 a	Yes	No	No
Federated States of Micronesia	21 March 2012 a	Under development	Under development	No
Fiji	14 May 2008 a	No	No	Yes
Kiribati	27 September 2013 a	Yes	Yes	No
Nauru	12 July 2012 a	No	No	No
Niue	3 October 2017 a	No	No	No

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[5] PIFS (2019), Boe Declaration Action Plan, p. 18, , https://www.forumsec.org/wp-content/uploads/2019/10/BOE-document-Action-Plan.pdf.
[6] Ibid, p. 25.

Palau	24 March 2009 a	No	No	No[7]
Papua New Guinea	16 July 2007	Yes	Yes	Yes
Republic of the Marshall Islands	17 November 2011 a	Yes[8]	No	No
Samoa	18 April 2018 a	No	No	No
Solomon Islands	6 January 2012 a	Yes	Yes	Yes
Tonga	6 February 2020 a	No	No	No
Tuvalu	4 September 2015 a	Under development	Under development	No
Vanuatu	12 July 2011 a	Yes	Under development	No

7.	Despite this progress, there remains a serious lack of sufficient public sector capacities and resources for detection, prosecution and adjudication of anti-corruption matters. The investigative capacities (including the forensic accounting skills needed to track corrupt money flows) are in short support in most of the region, with most police forces having very limited corruption capabilities. Likewise, government prosecutors are generally under-resourced, with corruption crimes just one of a vast range of criminal activities that prosecutors are responsible for.

8.	While institutional investigative capacities remain weak, social accountability mechanisms are also weak as a result of weak public information systems. The SGDs themselves recognize that every person has the right of everyone to access and impart information freely; the right remains critical to countering corruption, not only in terms of uncovering specific instances of corruption, but also in terms of promoting overall transparency and accountability of Governments. UNDP has been promoting the right to information in the Pacific for more than a decade, including more recently through the United Nations Pacific Regional Anti-Corruption (UN-PRAC) project (2012-21). UN-PRAC is soon coming to an end, but challenges remain regarding the operationalization of the right to information, both through specific legal frameworks and through improved proactive disclosure systems which will enable both public officials and members of the public to more effectively share and access government information.

## II.	PURPOSE AND EXPECTED OUTPUTS

9.	This Project seeks to complement and not duplicate existing regional and national anti-corruption efforts. To that end, the Project's purpose is to work with government and non-government partners across the Pacific to strengthen core capacities to prevent and fight corruption to support improved implementation of the Agenda 2030 and the SDGs (in particular, relevant SDG-16 targets). To do this, the Project will focus on two key outputs:
- (i)	Strengthening the capacities of key public sector organizations and officials to systematically implement improved accountability frameworks, including through more effective investigation and prosecution of corruption, and
- (ii)	Improving citizens' access to information to strengthen oversight and accountability efforts by non-state actors.

> ***Output 1.*** Key public sector organizations and officials systematically implement improved accountability frameworks aimed at tackling corruption through greater transparency and oversight

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[7] Palau has a specific Special Prosecutor with a mandate to investigate corruption.
[8] A national Good Governance Committee was established in 2019. It is understood this Committee includes oversight over issues relating to public accountability and corruption.

10. This output aims to strengthen corruption law enforcement capacities across the Pacific, through a range of training and accompaniment activities which will prioritise South-South expertise exchanges as well as leveraging the knowledge and partnerships of anti-corruption experts working in the region. As the only fully operational anti-corruption agency in the Pacific, the Fiji Independent Commission against Corruption (FICAC) will serve as a knowledge hub, but other knowledge providers and experts will also be drawn on to ensure that Pacific partners can access cutting edge technical advice on a range of specific corruption issues.

Activity Result 1.1: development and implementation of a comprehensive plan for South -South/sub-regional knowledge exchanges between at least two anti-corruption institutions

11. Since early 2021, UN-PRAC – which is co-managed by the UNDP Pacific Office – has already been implementing a programme of South-South exchanges between the Fiji ICAC and the new Solomon Islands ICAC, but this will come to an end at the conclusion of UN-PRAC on 30 June 2021. Under this Project, UNDP will support similar South-South exchanges between the Fiji ICAC and the Solomon Islands ICAC. UNDP PNG is shortly staring to rollout support to the new PNG ICAC and the Project will also explore options for supporting South-South exchanges with that ICAC. The Project will also explore options for supporting such exchanges with other corruption bodies in the region, such as the Palau Special Prosecutor and the (still to be established) Tonga Anti-Corruption Commission.[9]

12. The Project will start with a capacity needs assessment of at least 2 PIC anti-corruption institutional partners, which will be used to develop a comprehensive plan for South-South/sub-regional knowledge exchanges between at least two anti-corruption institutions, with the Fiji Independent Commission against Corruption (FICAC) serving as a knowledge hub for the region. In addition to direct personnel exchanges and training activities facilitated between these bodies, the Project will also produce manuals and guidelines which draw on the Pacific contextualized knowledge that have been learned through this stream of work.

Activity Result 1.2: Provision of specialized trainings to key institutions through regional, sub-regional and national workshops to investigate and prosecute cases regarding misuse of public moneys and related financial crimes.

Provision of specialized trainings to key institutions through regional, sub-regional and national workshops to investigate and prosecute cases regarding misuse of public moneys and related financial crimes. Specifically, justice sector counterparts will be supported through training and on the job mentoring on: (i) preparing and prosecuting civil asset forfeiture cases against organizations and individuals linked to financial crime and transnational crime; (ii) securing host nation agreements for asset-sharing protocols to split the proceeds of criminal and civil asset forfeiture cases; (iii) supporting and advocating for resource allocation and strategic planning to counter financial crime and money laundering, and related crimes including trafficking in persons; illegal wildlife trafficking; illegal, unreported, and unregulated fishing; and other environmental crimes.

Activity Result 1.3 Provision of technical assistance, training and mentoring to address organizational weaknesses within the criminal justice sector and individual criminal justice institutions in relation to investigating financial crimes, including Financial Intelligence Units, prosecution services, and designated non-financial businesses or professions

The loss of public revenues from national treasuries due to corruption continues to pose one of the most fundamental challenges to sustainable development in the region. While considerable progress has been made in strengthening national frameworks and laws to address such corruption, implementation and enforcement remains a massive problem. Specifically, police forces and prosecutors generally lack investigative capacities needed to run complex corruption cases, but supporting bodies such as Financial Intelligence Units, customs inspection units and tax inspection units are also often weak. In many countries, there is also a lack of coordination and efficient information sharing between these bodies.

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[9]https://www.rnz.co.nz/international/programmes/datelinepacific/audio/201820416/independence-needed-around-tongan-anti-corruption-appointment

13.　　To address these gaps, the Project will convene regional, sub-regional and national workshops aimed at strengthening institutional capacities across the region to investigate and prosecute cases regarding misuse of public moneys and related financial crimes. Justice and financial sector counterparts will be supported through training and on-the-job mentoring aimed at: (i) strengthening capacities to investigate financial and corruption related crimes; (ii) securing host nation agreements for asset-sharing protocols to split the proceeds of criminal and/or civil asset forfeiture cases; (iii) supporting and advocating for resource allocation and strategic planning to counter financial crime and money laundering, and related crimes[10]; and (iv) preparing and prosecuting civil asset forfeiture cases against organizations and individuals linked to financial crime and transnational crime. Based on needs identified through the capacity development workshops, the Project will also develop guidelines and manuals to assist investigators and prosecutors.

14.　　In order to ensure the most relevant expertise is shared with Pacific partners, UNDP will draw on expertise a range of specialist organisations for the delivery of training, technical assistance, and mentoring, as needed. The Project will draw on UNDP's extensive global networks to access expertise from other corruption specialists interested in the region, including the Asia Pacific Group on Money Laundering , the World Bank Stolen Assets Recovery (STAR) Initiative, leading regional ICACs (such as the Indonesian KPK, Malaysian ICAC and the Australian states (noting that state-level bodies have different mandates and different resource envelopes which make them more relevant to the Pacific)) and experts from the UK Serious Fraud Office. Notably, anti-corruption authorities from Fiji, Australia and the UK have particularly relevant experience for Pacific member states who are also Commonwealth members, as they have very similar political and legal systems which facilitates effective knowledge sharing.

Output 2. Improved access to information contributes to strengthened oversight by non-state actors

15.　　This output seeks to strengthen government and civil society knowledge of the value of the right to information and open government to sustainable development. The Project will work with governments to prototype innovative digital solutions to facilitate regular and proactive disclosure of government information. The Project also aims to change people's attitudes to exercise of the right to information as an important anti-corruption, transparency, and accountability mechanism by engaging in advocacy and awareness about the values of open data / public information for civil society and the private sector (with a focus on women-owned enterprises). The following activities will be implemented for this output.

Activity Result 2.1 Provision of technical and innovation assistance for improved exercise of the right to information, including through comparative analysis and prototyping of innovative digital solutions to facilitate the regular and proactive disclosure of government information.

16.　　Proactive disclosure can be implemented without a law, if there is a commitment to ensuring better access to government information, depending on their resources and commitment to openness, Governments can harness technology approaches to develop simple portals, mobile applications and other mechanisms to facilitate proactive disclosure of critical information, including regarding procurement activities, contracts and welfare payments. There are numerous examples globally that can be learned from;[11] UN-PRAC is already supporting a South-South exchange in the Pacific with Bangladesh on harnessing ICTs for information disclosure. Building on this work, the Project will provide technical and innovation assistance to work with interested Government partners to prototype innovative digital solutions to facilitate the regular and proactive disclosure of government information through the development of citizen-friendly platforms for access to information. The prototypes will be informed by consultations with government officials, information users and experts. The access to information prototypes will aim to demonstrate how

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[10] Including in relation to: trafficking in persons; illegal wildlife trafficking; illegal, unreported, and unregulated fishing; and other environmental crimes

[11] India uses proactive disclosure to promote accountability in relation to a major set of welfare payments through the National Employment Guarantee Portal, and the Nigeria Infrastructure Concession Regulatory Commission (ICRC) Infrastructure Contracts Disclosure Portal releases information on infrastructure procurements and contracts. Meanwhile, the Canada Proactive Disclosure Portal and Brasil Transparencia Portals are incredibly comprehensive and regularly release information on public contracts, expenditures by and information regarding the administration of welfare programs.

information can be efficiently disclosed by focusing on at least one critical service delivery area (e.g. health, social sector etc).

Activity Results 2.2: Design and implementation of an awareness and capacity-building workshops about the values of open data and public in-formation for seeking public accountability through engagement with civil society.

Through UN-PRAC UNDP has already been supporting major right to information programming across the region. This Project will leverage those activities for some quick wins. The Project will design and roll out awareness and capacity-building workshops with core groups who can impactfully share or use public information, namely government officials, CSOs and the private sector. The workshops will discuss the value of open data and public information, with an emphasis on practical approaches to obtaining information from governments and using that information to promote greater accountability

Act 2.3 Production of a prototype scenario/model of a citizen-friendly platform for access to information based on consultations with citizens and experts and the comparative analysis of good international practices.

17.   This will build on activity 2.1 For civil society groups, workshops will include discussions of successful social accountability approaches that have been implemented in other PICs and globally, with a view to triggering interest in CSOs to engage in such activities themselves. The Project will proactively engage women and young people, to identify their specific information needs and to ensure that information systems are specifically designed to serve the these often-marginalised groups.

Act 2.4 Design and implementation of an awareness and capacity-building campaign among small and medium-sized enterprises, specifically women and youth owned to realise the benefits and proactively seek access to information and open data for preventing corruption, unleashing the potentials of business, business innovation and income generation purposes.

18.   A specific stream of work will focus on the private sector, with a specific focus on small and medium enterprises (SMEs). This work recognises that businesses can benefit from open government systems which make government business regulation/processes more transparent, but also that the private sector in the PICs are often influential and can use their access to PIC Governments to encourage them to prioritise open government and proactive disclosure. Improved access to information by SMEs can unleash the potential of business and business innovation for income generation. Workshops will be designed as two-way feedback processes, which will also be used to help identify the information of most relevance to SMEs, which can then be shared back with Government partners.

Act 2.5 Information needs mapping/assessment focused specifically on women-owned enterprises will be undertaken in at least 1 PIC.

19.   Activities with the private sector will also be complemented by activities specifically focused on women-owned enterprises. The Project will be undertaking an information needs mapping/assessment on women-owned enterprises in at least 1 PIC. This mapping will be implemented in collaboration with a Government partner and the results used to work with that Government partners to explore options for addressing any information gaps, blockages and priority needs that are identified in the assessment.

Project aligned with UN Frameworks

20.   This Project aligns with UNDP's global and regional strategic frameworks, which empower UNDP to provide governance assistance to partner Governments, including electoral support. Specifically, in the Pacific, this Project will contribute to the following regional outcomes and outputs:

> *United Nations Pacific Strategy (2018-2022) Outcome 5*: By 2022, people and communities in the Pacific will contribute to and benefit from inclusive, informed and transparent decision-making processes, accountable and responsive institutions, and improved access to justice.

> *UNDP Subregional programme document (SRPD) for the Pacific Island Countries and Territories (2018-2022) Output 5.2*: Increased transparency and accountability in governance institutions and formal and informal decision-making processes.

III.   MANAGEMENT ARRANGEMENTS

21. It is not mandatory to have a Project Board under an Initiation Phase. The Project under the Initiation Phase will be managed directly by UNDP as per policy on Initiation Plan modalities. The project will be based out of the offices of the UNDP Pacific Office in Fiji and will be managed as part of the Effective Governance Unit based in Suva.

22. UNDP offers value for money through cooperation and cost-sharing with other UNDP projects and UN agencies, for example cost-sharing of staff, overhead, expenses, and implementation of activities. This not only decreases project implementation costs, but also amplifies the reach and effects of project activities. The project will be managed effectively and in accordance with UNDP Programme and Operations Policies and Procedures to ensure as far as practicable, progress towards the project outcome. The Project Board will be updated, and all reports produced on time to ensure the smooth flow of communications between project partners.

23. The Project will maximise efficiency by drawing on existing staff wherever possible, including cost sharing the UNDP Regional Elections Advisor. Staffing is described below:

> *UNDP Anti-Corruption Adviser (50% - P4)*: UNDP has been employing an Anti-Corruption (AC) Technical Adviser to support UN-PRAC who will lead implementation of this Project, with the conclusion of UN-PRAC from 30 June 2021. The AC Technical Adviser will work ensure that the Project will be guided by high quality advice at all times, but will also ensure great efficiency, as the size of the Project cannot justify a full-time advisor at this stage.

> *UNDP National Project Officer (100%, SB4 level)*: The AC Technical Adviser will be supported by a full-time NPO will be responsible for supporting the implementation of all Project activities, with a particular focus on organisation of workshops and other capacity building activities, under the guidance of the AC Specialist.

> *UNDP Governance Unit Team Leader and Deputy Team Leader (5% each)*: High level management oversight of the entire Project will be provided by the existing UNDP Governance senior managers. They will manage any political elements of the Project, in particular liaising with Government counterparts and will keep close watch on risks, in particular, ensuring that the Project delivers timely support at all times.

24. The Project will also draw on expert consultants as necessary, to ensure that the most appropriate technical advice is provided to partners. This includes recruiting ICT expertise to support Activity 2.2 to develop ICT prototypes in support of proactive disclosure of government information.

IV.   MONITORING

25.   A 6-monthly report will be produced to ensure progress is monitored on an ongoing basis. A final Progress Report will be prepared at the end of the Initiation Plan, using the standard format available in the Executive Snapshot. A full project document will be attached to the final report; if one is not attached, the final Project Report will include an explanation of why the PIP failed to produce a full project.

Monitoring Activity	Purpose	Frequency	Expected Action	Partners (if joint)	Cost (if any)
Learn	Knowledge, good practices and lessons will be captured	End of the Project	Relevant lessons are captured by the project team and used to inform management decisions.	UNDP Project Team	N/A
Progress Reports	A short progress report will be submitted to UNDP & FCO tracking progress achieved at the activity result level	Quarterly	Reports review to ensure delivery is on track in advance of the 2022 elections	UNDP Project Team	N/A
Final Project Report	A final report will be produced, capturing the outputs and impacts of the Project (and attaching a full Prodoc if one is produced)	End of Project	Reports will be reviewing by UNDP, FEC and FEO.	UNDP Project Team	N/A

V.   IMPLENTATION MODALITIES

As the project is targeted at capacity building of different institutions, implementation will be don through grants, letters of agreements and contracts with CSO, government institutions, individual and firms. In addition, UNDP will directly implement activities as appropriate.

VI. WORK PLAN

Period: 21 July 2021 to 31 March 2022

EXPECTED OUTPUTS *And baseline, indicators including annual targets*	PLANNED ACTIVITIES *List activity results and associated actions*	TIMEFRAME				RESPONSIBLE PARTY	PLANNED BUDGET		
		Q3 2021	Q4 2021	Q1 2022	Q2 2022		Funding Source	Budget Description	Amount
Output 1. Key public sector institutions and officials have stronger capacities to investigate and prosecute corruption and financial crimes *Baseline: All PICS have police/public prosecutors/ICACs tasked with law enforcement re corruption but investigation & prosecutions skills are very variable* *Indicators:*	*Activity Result 1.1: development and implementation of a comprehensive plan for South - South/sub-regional knowledge exchanges between at least two anti-corruption institutions* - Undertake at least capacity assessments of at least 2 Pacific AC bodies + produce capacity development plans - Facilitate at least 3 South-South exchanges between Pacific AC institutions with Fiji ICAC or other partners - Support Fiji ICAC to institutionalise their support to other PIC AC bodies (eg. share info on website; agree MOUs between AC bodies; summarise lessons)	x	x	x		UNDP	Government of UK	Travel DSA International Consultant Conference Venue Print/ Publication DPC	44,842

EXPECTED OUTPUTS And baseline, indicators including annual targets	PLANNED ACTIVITIES *List activity results and associated actions*	TIMEFRAME				RESPONSIBLE PARTY	PLANNED BUDGET		
		Q3 2021	Q4 2021	Q1 2022	Q2 2022		Funding Source	Budget Description	Amount
- *Fiji ICAC dedicating specific resources to supporting Pacific exchanges* - *At least 20 corruption investigators & prosecutors involved in capacity development* ***Related CP outcome:*** *Outcome 5: Effective governance for service delivery*	***Activity Result 1.2 Provision of specialized trainings to key institutions through regional, sub-regional and national workshops to investigate and prosecute cases regarding misuse of public moneys and related financial crimes.*** - At least 4 skills-building workshops organized with Pacific investigators and prosecutors, incl through South-South and expert exchanges - Online technical advice provided in support of AC investigations - At least 1 guidance note produced to assist Pacific AC investigators and/or prosecutors	x	x	x		**UNDP**	Government of UK	Travel DSA International Consultant Conference Venue Print/ Publication DPC	**82,116**

EXPECTED OUTPUTS *And baseline, indicators including annual targets*	PLANNED ACTIVITIES *List activity results and associated actions*	TIMEFRAME				RESPONSIBLE PARTY	PLANNED BUDGET		
		Q3 2021	Q4 2021	Q1 2022	Q2 2022		Funding Source	Budget Description	Amount
	Activity Result 1.3 Provision of technical assistance, training and mentoring to address organizational weaknesses within the criminal justice sector and individual criminal justice institutions in relation to investigating financial crimes, including Financial Intelligence Units, prosecution services, and designated non-financial businesses or professions -Development of Guidelines for investigation and -prosecution, adjudication, rules of procedure and bench books	x	x	x			Government of UK	Travel DSA International Consultant Conference Venue Print/ Publication DPC	111,762

Output 2. Improved access to information contributes to strengthened oversight by non-state actors *Baseline:* Vanuatu *implementing FOI regime; Cook Islands, Fiji, Palau, PNG, Solomon Islands developing FOI laws. Fiji, PNG have RTI in their constitutions* *Indicators:* *- At least 2 proactive disclosure prototypes designed and tested with users* *- At least 10 CSO & private sector participants report greater commitment to advocating for FOI* *Related CP outcome:* Outcome *5: Effective governance for service delivery*	*Activity Result 2.1: Provision of technical and innovation assistance for improved exercise of the right to information, including through comparative analysis and prototyping of innovative digital solutions to facilitate the regular and proactive disclosure of government information.* - Development of Development of innovative digital solutions on RTI - Initial prototypes concepts designed with innovation and ICT experts - Workshop organized stakeholders and innovation experts to validate prototype concepts - Prototypes built and tested with partners *Awareness raised with civil society and private sector partners on conceptual and operational principles regarding open government* - At least 3 awareness raising workshops organized with CSOs –	x	x	x		**UNDP**	Government of UK	Travel DSA International Consultant Conference Venue Print/ Publication DPC	49,015

EXPECTED OUTPUTS *And baseline, indicators including annual targets*	PLANNED ACTIVITIES *List activity results and associated actions*	TIMEFRAME				RESPONSIBLE PARTY	PLANNED BUDGET		
		Q3 2021	Q4 2021	Q1 2022	Q2 2022		Funding Source	Budget Description	Amount
	with focus on women and young people - At least 3 awareness raising workshops organized with private sector SMEs, incl women-run SMEs - At least 1 briefing note produced on value of and fundamental concepts related to open govt								

EXPECTED OUTPUTS And baseline, indicators including annual targets	PLANNED ACTIVITIES *List activity results and associated actions*	TIMEFRAME				RESPONSIBLE PARTY	PLANNED BUDGET		
		Q3 2021	Q4 2021	Q1 2022	Q2 2022		Funding Source	Budget Description	Amount
	Activity Results 2.2: Design and implementation of an awareness and capacity-building workshops about the values of open data and public in-formation for seeking public accountability through engagement with civil society. - Develop IEC materials and information awareness packages - At least 3 awareness raising workshops organized with CSOs – with focus on women and young people - At least 1 briefing note produced on value of and fundamental concepts related to open govt	x	x	x		UNDP	Government of UK	Travel DSA International Consultant Conference Venue Print/ Publication DPC	53,655

EXPECTED OUTPUTS *And baseline, indicators including annual targets*	PLANNED ACTIVITIES *List activity results and associated actions*	TIMEFRAME				RESPONSIBLE PARTY	PLANNED BUDGET		
		Q3 2021	Q4 2021	Q1 2022	Q2 2022		Funding Source	Budget Description	Amount
	Activity Result 2.3: Production of a prototype scenario/model of a citizen-friendly platform for access to information based on consultations with citizens and experts and the comparative analysis of good international practices. - Workshops organized with CSOs and innovation experts to identify possible prototypes - Initial prototypes concepts designed with innovation and ICT experts - Workshop organized with CSOs and innovation experts to validate prototype concepts - Prototypes built and tested with partners	x	x	x		UNDP	Government of UK	Travel DSA International Consultant Conference Venue Print/ Publication DPC	37,888

EXPECTED OUTPUTS And baseline, indicators including annual targets	PLANNED ACTIVITIES List activity results and associated actions	TIMEFRAME				RESPONSIBLE PARTY	PLANNED BUDGET		
		Q3 2021	Q4 2021	Q1 2022	Q2 2022		Funding Source	Budget Description	Amount
	Activity Result 2.4: Design and implementation of an awareness and capacity-building campaign among small and medium-sized enterprises, specifically women and youth owned to realise the benefits and proactively seek access to information and open data for preventing corruption, unleashing the potentials of business, business innovation and income generation purposes - Design series of webnairs and trainings - Conduct awareness raising organized with private sector SMEs, incl women-run and youth -run SMEs. -					UNDP	Government of UK	Travel DSA International Consultant Conference Venue Print/ Publication DPC	45,204

EXPECTED OUTPUTS And baseline, indicators including annual targets	PLANNED ACTIVITIES List activity results and associated actions	TIMEFRAME				RESPONSIBLE PARTY	PLANNED BUDGET		
		Q3 2021	Q4 2021	Q1 2022	Q2 2022		Funding Source	Budget Description	Amount
	Act 2.5 Information needs mapping/assessment focused specifically on women-owned enterprises will be undertaken in at least 1 PIC. - Identification of women owned enterprises for assessment - Conduct scoping exercise and needs assessment - Develop information to meet identified needs	x	x	x		UNDP	Government of UK	Travel DSA International Consultant Conference Venue Print/ Publication DPC	39,974
Total Indirect Cost									37,157
RCO Levy									4,645
TOTAL									$506,259

Risk Log

Likelihood: 1 = very likely and 3 = not very likely)

Impact: 1 = very serious and 5 = not serious)

#	Description	Risk Category	Risk Level	Risk Treatment / Management Measures	Risk Owner
1	Lack of political will	Programmatic & Political	Likelihood =2 Impact = 2	* Utilizing the UNCAC processes, as entry point in anti-corruption reforms, and where possible, VNRs, the UNPS and SDG progress *Specific work with MPs across parties to build political commitment * Rely on requests for assistance to ensure sufficient political will prior to engagement * Approach of linking corruption and development will help to demystify corruption and secure necessary political will and buy-in from wider stakeholders * Utilize existing tools and methodologies to assess the political economy of a country and tailor activities accordingly * Strengthening outreach to non-State actors to enhance social pressure for transparency and accountability	UNDP
2	Political instability stalls legislative and high-level reforms	Operational & Programmatic & Political	Likelihood =2 Impact = 2	* Wide stakeholder consultations to get cross-party support * Close liaison with key political actors * Work in multiple countries, to allow for flexibility * Strengthen outreach to non-state actors through project activities *Promote UN's impartiality principle of work *Maintain good reporting lines with the donor and adjust Programme activities accordingly	UNDP
3	Changing Government Staff in partner countries	Operational & Programmatic	Likelihood =2, Impact = 2	* Multiple partners included in Programme across departments *Maintain communication at the highest level	UNDP

4	Lack of human and financial resources on the side of the governments	Fiscal/ Programmatic	Likelihood =2, Impact=2	*The regional nature of the Programme enables selection of the best prepared partners to become the champions and also proposing of regional solutions *The Programme will focus on promoting the value (financial and democratic) of prevention versus repression *The nature of the Programme is such that it is based on providing of technical and sometimes financial assistance for start-up of reforms *The Programme will work on proposing rational and cost-effective institutional solutions, as well as support partnerships with the non-State actors for better cost-efficiency; *The Programme will invest in networking, partnering and advocacy for mobilizing other supporters for this important endeavour	UNDP
5	Local cultures and traditions not aligned with the contemporary understanding and addressing corruption	Social/ Programmatic	Likelihood =2, Impact =3	*Use local actors/champion CSOs, businesses and individuals, as catalysts *Localizing activities *Promote the issue through the support of regional for a and networks and broad engagement in the UNCAC review processes *Strong focus on youth as a driver of change and accountability *Focus on social accountability tools *Focus on innovation and use of ICT to the extent possible	UNDP

SOCIAL AND ENVIRONMENTAL SCREENING TEMPLATE

Project Information

Project Information	
1. Project Title	**Strengthening Anticorruption, Transparency and Accountability in Pacific Island Countries** ("Pacific Anti-Corruption Project")
2. Project Number (i.e. Atlas project ID, PIMS+)	
3. Location (Global/Region/Country)	Pacific Regional
4. Project stage (Design or Implementation)	Design
5. Date	21 July 2021

Part A. Integrating Programming Principles to Strengthen Social and Environmental Sustainability

QUESTION 1: How Does the Project Integrate the Programming Principles in Order to Strengthen Social and Environmental Sustainability?
Briefly describe in the space below how the project mainstreams the human rights-based approach
Corruption is a human rights violation which diverts much needed public (and private) resources from effectively contributing to sustainable development. It often also actively undermines sustainable development when government officials corruptly make decisions for their personal benefit rather than in the public interest. Tackling corruption is therefore fundamentally about protecting and promoting human rights – funds that are not stolen from government through corruption can better be directed towards achieving economic and social rights.
This Project frames corruption from a human rights lens and works with partners to build their understanding of and commitment to managing government institutions and delivering government services accountably, transparently and inclusively. It also works with civil society and communities to build their understanding of how corruption negatively impacts their rights and how they can more effectively claim those rights from their governments.

Briefly describe in the space below how the project is likely to improve gender equality and women's empowerment
This Project predominantly works with PIC Governments and government agencies, to build their personnel and institutional capacities to tackle corruption. Gender equality and inclusion of women will be addressed in a number of ways when implementing activities with PIC Governments, including: - The project will encourage government delegations to the UNCAC COSP, IACC and other global and regional meetings to include women officials and civil society representatives. Some smaller island countries may not have sufficiently senior women in the right positions to be part of delegations, but the Programme will make efforts in such contexts to ensure gender balance by encouraging participation of women from civil society..   - Where THE PROJECT itself organises training or other capacity development activities, THE PROJECT will aim to ensure gender balance amongst participants, to the extent possible while still ensuring that the appropriate officials are in attendance;   In addition to work with PIC governments, the project includes outputs which work directly with civil society, women's groups and young people. These activities have been specifically designed to promote social inclusion in national efforts to tackle corruption, including by bringing in young people. The Project has committed to exploring opportunities to work with civil society and youth to more explicitly address issues relating to gender and corruption.   The Project's knowledge products will also be designed in order to ensure that they reflect upon the linkages between gender and corruption issues, as possible. Where campaign materials and other public education materials are produced, efforts will be made to ensure they reflect the particular perspectives of men and women and girls and boys.

Briefly describe in the space below how the project mainstreams sustainability and resilience
As part of the overall effort to tackle corruption, this project will further explore opportunities for analytical work and raising awareness about the negative affects of corruption in the natural resources and extractive industries sectors. Through the Pacific, there is considerable corruption affecting the fisheries, forestries and minerals sectors. Building on the analytical work on the forestry and fisheries sectors undertaken during Phase II, the project will explore opportunities for capacity-building and addressing the related recommendations.   The linkages between climate change efforts and the fight against corruption will also be further reinforced.

Briefly describe in the space below how the project strengthens accountability to stakeholders
The project strengthen accountability to stakeholders through leveraging on mechanisms under the on-going UNPRAC Project. A steering committee under that project will be used for engaging with and reporting to stakeholders and development partners

Part B. Identifying and Managing Social and Environmental Risks

QUESTION 2: What are the Potential Social and Environmental Risks? *Note: Complete SESP Attachment 1 before responding to Question 2.*	QUESTION 3: What is the level of significance of the potential social and environmental risks? *Note: Respond to Questions 4 and 5below before proceeding to Question 5*			QUESTION 6: Describe the assessment and management measures for each risk rated Moderate, Substantial or High
Risk Description *(broken down by event, cause, impact)*	*Impact and Likelihood (1-5)*	*Significance (Low, Moderate Substantial, High)*	*Comments (optional)*	*Description of assessment and management measures for risks rated as Moderate, Substantial or High*
Risk 1: Governments could retaliate against anti-corruption bodies, activists, media or civil society if they expose their corruption	I = 5 P = 3	Moderate	Some PIC Govts have already threatened media and civil society for exposing corruption	The Project will work closely with PIC Govts to build their commitment to tackling corruption and respecting the role of civil society and the media
	QUESTION 4: What is the overall project risk categorization?			
	Low Risk	X		
	Moderate Risk	☐		
	Substantial Risk	☐		

					Status? (completed, planned)
		High Risk	☐		
		**QUESTION 5: Based on the identified risks and risk categorization, what requirements of the SES are triggered? (check all that apply)**			
		Question only required for Moderate, Substantial and High Risk projects			
	Is assessment required? (check if "yes")		☐		*Status? (completed, planned)*
	if yes, indicate overall type and status		☐	Targeted assessment(s)	
			☐	ESIA (Environmental and Social Impact Assessment)	
			☐	SESA (Strategic Environmental and Social Assessment)	
	Are management plans required? (check if "yes)		☐		
	If yes, indicate overall type		☐	Targeted management plans (e.g. Gender Action Plan, Emergency Response Plan, Waste Management Plan, others)	
			☐	ESMP (Environmental and Social Management Plan which may include range of targeted plans)	
			☐	ESMF (Environmental and Social Management Framework)	
	Based on identified risks, which Principles/Project-level Standards triggered?			**Comments (not required)**	
	Overarching Principle: Leave No One Behind		X		
	Human Rights		☐ X		

	Gender Equality and Women's Empowerment	☐ X
	Accountability	☐ X
	1. *Biodiversity Conservation and Sustainable Natural Resource Management*	☐
	2. *Climate Change and Disaster Risks*	☐
	3. *Community Health, Safety and Security*	☐
	4. *Cultural Heritage*	☐
	5. *Displacement and Resettlement*	☐
	6. *Indigenous Peoples*	☐
	7. *Labour and Working Conditions*	☐
	8. *Pollution Prevention and Resource Efficiency*	☐

Final Sign Off

Final Screening at the design-stage is not complete until the following signatures are included

Signature	Date	Description
QA Assessor		UNDP staff member responsible for the project, typically a UNDP Programme Officer. Final signature confirms they have "checked" to ensure that the SESP is adequately conducted.
QA Approver		UNDP senior manager, typically the UNDP Deputy Country Director (DCD), Country Director (CD), Deputy Resident Representative (DRR), or Resident Representative (RR). The QA Approver cannot also be the QA Assessor. Final signature confirms they have "cleared" the SESP prior to submittal to the PAC.
PAC Chair		UNDP chair of the PAC. In some cases PAC Chair may also be the QA Approver. Final signature confirms that the SESP was considered as part of the project appraisal and considered in recommendations of the PAC.

SESP Attachment 1. Social and Environmental Risk Screening Checklist

Checklist Potential Social and Environmental **Risks**	
INSTRUCTIONS: The risk screening checklist will assist in answering Questions 2-6 of the Screening Template. Answers to the checklist questions help to (1) identify potential risks, (2) determine the overall risk categorization of the project, and (3) determine required level of assessment and management measures. Refer to the SES toolkit for further guidance on addressing screening questions.	
Overarching Principle: Leave No One Behind **Human Rights**	**Answer (Yes/No)**
P.1 Have local communities or individuals raised human rights concerns regarding the project (e.g. during the stakeholder engagement process, grievance processes, public statements)?	*NO*
P.2 Is there a risk that duty-bearers (e.g. government agencies) do not have the capacity to meet their obligations in the project?	*NO*
P.3 Is there a risk that rights-holders (e.g. project-affected persons) do not have the capacity to claim their rights?	*NO*
Would the project potentially involve or lead to:	
P.4 adverse impacts on enjoyment of the human rights (civil, political, economic, social or cultural) of the affected population and particularly of marginalized groups?	NO
P.5 inequitable or discriminatory impacts on affected populations, particularly people living in poverty or marginalized or excluded individuals or groups, including persons with disabilities? [12]	NO
P.6 restrictions in availability, quality of and/or access to resources or basic services, in particular to marginalized individuals or groups, including persons with disabilities?	NO

P.7 exacerbation of conflicts among and/or the risk of violence to project-affected communities and individuals?	NO
Gender Equality and Women's Empowerment	
P.8 Have women's groups/leaders raised gender equality concerns regarding the project, (e.g. during the stakeholder engagement process, grievance processes, public statements)?	NO
Would the project potentially involve or lead to:	
P.9 adverse impacts on gender equality and/or the situation of women and girls?	*NO*
P.10 reproducing discriminations against women based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?	NO
P.11 limitations on women's ability to use, develop and protect natural resources, taking into account different roles and positions of women and men in accessing environmental goods and services? *For example, activities that could lead to natural resources degradation or depletion in communities who depend on these resources for their livelihoods and well being*	NO
P.12 exacerbation of risks of gender-based violence? *For example, through the influx of workers to a community, changes in community and household power dynamics, increased exposure to unsafe public places and/or transport, etc.*	NO
Sustainability and Resilience: Screening questions regarding risks associated with sustainability and resilience are encompassed by the Standard-specific questions below	
Accountability	
Would the project potentially involve or lead to:	
P.13 exclusion of any potentially affected stakeholders, in particular marginalized groups and excluded individuals (including persons with disabilities), from fully participating in decisions that may affect them?	NO
P.14 grievances or objections from potentially affected stakeholders?	NO

P.15	risks of retaliation or reprisals against stakeholders who express concerns or grievances, or who seek to participate in or to obtain information on the project?	NO
Project-Level Standards		
Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management		
Would the project potentially involve or lead to:		
1.1	adverse impacts to habitats (e.g. modified, natural, and critical habitats) and/or ecosystems and ecosystem services? *For example, through habitat loss, conversion or degradation, fragmentation, hydrological changes*	NO
1.2	activities within or adjacent to critical habitats and/or environmentally sensitive areas, including (but not limited to) legally protected areas (e.g. nature reserve, national park), areas proposed for protection, or recognized as such by authoritative sources and/or indigenous peoples or local communities?	NO
1.3	changes to the use of lands and resources that may have adverse impacts on habitats, ecosystems, and/or livelihoods? (Note: if restrictions and/or limitations of access to lands would apply, refer to Standard 5)	NO
1.4	risks to endangered species (e.g. reduction, encroachment on habitat)?	NO
1.5	exacerbation of illegal wildlife trade?	NO
1.6	introduction of invasive alien species?	NO
1.7	adverse impacts on soils?	NO
1.8	harvesting of natural forests, plantation development, or reforestation?	NO
1.9	significant agricultural production?	NO
1.10	animal husbandry or harvesting of fish populations or other aquatic species?	NO
1.11	significant extraction, diversion or containment of surface or ground water? *For example, construction of dams, reservoirs, river basin developments, groundwater extraction*	NO

1.12	handling or utilization of genetically modified organisms/living modified organisms?[13]	NO
1.13	utilization of genetic resources? (e.g. collection and/or harvesting, commercial development)[14]	NO
1.14	adverse transboundary or global environmental concerns?	NO
Standard 2: Climate Change and Disaster Risks		
Would the project potentially involve or lead to:		
2.1	areas subject to hazards such as earthquakes, floods, landslides, severe winds, storm surges, tsunami or volcanic eruptions?	NO
2.2	outputs and outcomes sensitive or vulnerable to potential impacts of climate change or disasters? *For example, through increased precipitation, drought, temperature, salinity, extreme events, earthquakes*	NO
2.3	increases in vulnerability to climate change impacts or disaster risks now or in the future (also known as maladaptive or negative coping practices)? *For example, changes to land use planning may encourage further development of floodplains, potentially increasing the population's vulnerability to climate change, specifically flooding*	NO
2.4	increases of greenhouse gas emissions, black carbon emissions or other drivers of climate change?	NO
Standard 3: Community Health, Safety and Security		
Would the project potentially involve or lead to:		
3.1	construction and/or infrastructure development (e.g. roads, buildings, dams)? (Note: the GEF does not finance projects that would involve the construction or rehabilitation of large or complex dams)	NO

3.2	air pollution, noise, vibration, traffic, injuries, physical hazards, poor surface water quality due to runoff, erosion, sanitation?	NO
3.3	harm or losses due to failure of structural elements of the project (e.g. collapse of buildings or infrastructure)?	NO
3.4	risks of water-borne or other vector-borne diseases (e.g. temporary breeding habitats), communicable and noncommunicable diseases, nutritional disorders, mental health?	NO
3.5	transport, storage, and use and/or disposal of hazardous or dangerous materials (e.g. explosives, fuel and other chemicals during construction and operation)?	NO
3.6	adverse impacts on ecosystems and ecosystem services relevant to communities' health (e.g. food, surface water purification, natural buffers from flooding)?	N0
3.7	influx of project workers to project areas?	NO
3.8	engagement of security personnel to protect facilities and property or to support project activities?	NO
Standard 4: Cultural Heritage		
Would the project potentially involve or lead to:		
4.1	activities adjacent to or within a Cultural Heritage site?	NO
4.2	significant excavations, demolitions, movement of earth, flooding or other environmental changes?	NO
4.3	adverse impacts to sites, structures, or objects with historical, cultural, artistic, traditional or religious values or intangible forms of culture (e.g. knowledge, innovations, practices)? (Note: projects intended to protect and conserve Cultural Heritage may also have inadvertent adverse impacts)	NO
4.4	alterations to landscapes and natural features with cultural significance?	NO
4.5	utilization of tangible and/or intangible forms (e.g. practices, traditional knowledge) of Cultural Heritage for commercial or other purposes?	NO
Standard 5: Displacement and Resettlement		

Would the project potentially involve or lead to:	
5.1	temporary or permanent and full or partial physical displacement (including people without legally recognizable claims to land)?	NO
5.2	economic displacement (e.g. loss of assets or access to resources due to land acquisition or access restrictions – even in the absence of physical relocation)?	NO
5.3	risk of forced evictions?[15]	NO
5.4	impacts on or changes to land tenure arrangements and/or community based property rights/customary rights to land, territories and/or resources?	NO
Standard 6: Indigenous Peoples	
Would the project potentially involve or lead to:	
6.1	areas where indigenous peoples are present (including project area of influence)?	NO
6.2	activities located on lands and territories claimed by indigenous peoples?	NO
6.3	impacts (positive or negative) to the human rights, lands, natural resources, territories, and traditional livelihoods of indigenous peoples (regardless of whether indigenous peoples possess the legal titles to such areas, whether the project is located within or outside of the lands and territories inhabited by the affected peoples, or whether the indigenous peoples are recognized as indigenous peoples by the country in question)? *If the answer to screening question 6.3 is "yes", then the potential risk impacts are considered significant and the project would be categorized as either Substantial Risk or High Risk*	NO
6.4	the absence of culturally appropriate consultations carried out with the objective of achieving FPIC on matters that may affect the rights and interests, lands, resources, territories and traditional livelihoods of the indigenous peoples concerned?	NO
6.5	the utilization and/or commercial development of natural resources on lands and territories claimed by indigenous peoples?	NO

6.6	forced eviction or the whole or partial physical or economic displacement of indigenous peoples, including through access restrictions to lands, territories, and resources? *Consider, and where appropriate ensure, consistency with the answers under Standard 5 above*	NO
6.7	adverse impacts on the development priorities of indigenous peoples as defined by them?	NO
6.8	risks to the physical and cultural survival of indigenous peoples?	NO
6.9	impacts on the Cultural Heritage of indigenous peoples, including through the commercialization or use of their traditional knowledge and practices? *Consider, and where appropriate ensure, consistency with the answers under Standard 4 above.*	NO
Standard 7: Labour and Working Conditions		
Would the project potentially involve or lead to: (note: applies to project and contractor workers)		
7.1	working conditions that do not meet national labour laws and international commitments?	NO
7.2	working conditions that may deny freedom of association and collective bargaining?	NO
7.3	use of child labour?	NO
7.4	use of forced labour?	NO
7.5	discriminatory working conditions and/or lack of equal opportunity?	NO
7.6	occupational health and safety risks due to physical, chemical, biological and psychosocial hazards (including violence and harassment) throughout the project life-cycle?	NO
Standard 8: Pollution Prevention and Resource Efficiency		
Would the project potentially involve or lead to:		

8.1	the release of pollutants to the environment due to routine or non-routine circumstances with the potential for adverse local, regional, and/or transboundary impacts?	NO
8.2	the generation of waste (both hazardous and non-hazardous)?	NO
8.3	the manufacture, trade, release, and/or use of hazardous materials and/or chemicals?	NO
8.4	the use of chemicals or materials subject to international bans or phase-outs? *For example, DDT, PCBs and other chemicals listed in international conventions such as the* Montreal Protocol, Minamata Convention, Basel Convention, Rotterdam Convention, Stockholm Convention	NO
8.5	the application of pesticides that may have a negative effect on the environment or human health?	NO
8.6	significant consumption of raw materials, energy, and/or water?	NO