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BNPB

Environmental and Social Management System Manual

Pooling Fund Bencana (PFB)

25 February 2026

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HISTORY OF REVISIONS

Date	Description	Remarks

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ABBREVIATIONS

AMDAL	*Analisis Mengenai Dampak Lingkungan*
AOI	Area of Influence
APBD	*Anggaran Pendapatan dan Belanja Daerah* / Regional Government Budget
APBN	*Anggaran Pendapatan dan Belanja Negara* / State Budget
AZE	Alliance for Zero Extinction
B3	*Bahan Berbahaya dan Beracun* / Hazardous and Toxic Materials
BAPPENAS	*Badan Perencanaan Pembangunan Nasional*/ National Development Planning Agency of Indonesia
BNPB	*Badan Nasional Penanggulangan Bencana* / National Disaster Management Agency
BPBD	*Badan Penanggulangan Bencana Daerah* / Regional Disaster Management Agency
BMF	Biodiversity Management Framework
BMP	Biodiversity Management Plan
BPDLH / IEF	*Badan Pengelola Dana Lingkungan Hidup* / Indonesia Environmental Fund
BPS	*Badan Pusat Statistik*
BUN	*Bendahara Umum Negara* / State General Treasurer
CFP	Chance Find Procedures
CHA	Critical Habitat Assessment
CHS	Community Health and Safety
CR	Critically Endangered (IUCN Criteria)
DAS	*Daerah Aliran Sungai* / Watershed
DJA	*Direktorat Jenderal Anggaran* / Directorate General of Budget
DJSEF	*Direktorat Jenderal Strategi Ekonomi dan Fiskal* / Directorate General of Economic and Fiscal Strategy
DRFI	Disaster Risk Financing and Insurance
DSP	*Dana Siap Pakai* / On-Call Budget
DVI	Disaster Victim Identification
E&S	Environmental and Social
EAAFP	East Asian and Australasian Flyway Partnership
EN	Endangered (IUCN Criteria)
EOP	Emergency Operation Plan
ERP	Emergency Response Plan
ESCAP	Environmental and Social Corrective Action Plan
ESCOP	Environmental and Social Codes of Practice
ESDM	*Energi dan Sumber Daya Mineral*
ESF	Environmental and Social Framework

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ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standards
EW MP	E-Waste Management Plan
FGRM	Feedback and Grievance Redress Mechanism
FPIC / PADIATAPA	Free, Prior, and Informed Consent / *Persetujuan Atas Dasar Informasi Awal Tanpa Paksaan*
GBV / SEA / SH	Gender-Based Violence / Sexual Exploitation and Abuse / Sexual Harassment
GoI	Government of Indonesia
Huntap	*Hunian Tetap/* Permanent Shelter
Huntara	*Hunian Sementara/* Temporary Shelter
IBA	Important Biodiversity Areas
IBAT	Integrated Biodiversity Assessment Tool
IFC	International Finance Corporation
IP	Indigenous People
IPP	Indigenous Peoples Plan
IPPF	Indigenous Peoples Planning Framework
IUCN	International Union for Conservation of Nature
ITB	*Institut Teknologi Bandung*/ Bandung Institute of Technology
KKPR/ PKKPR	*Kesesuaian Kegiatan Pemanfaatan Ruang/ Persetujuan Kesesuaian Kegiatan Pemanfaatan Ruang* (Conformity of Spatial Utilization Activities/Approval of Conformity of Spatial Utilization Activities)
KBA	Key Biodiversity Area
LMP	Labor Management Plan
MHA	*Masyarakat Hukum Adat* / Customary Communities/Customary Law Communities
MoEF	Minister of Environment and Forestry
MoF	Ministry of Finance
MSMEs	Micro, Small, and Medium Enterprises
NIB	*Nomor Induk Berusaha*/ Business Identification Number
NSPK	*Norma, Standar, Prosedur, Kriteria*
OHS	Occupational Health and Safety
OSS RBA	Online Single Submission – Risk Based Approach
OPD	*Organisasi Perangkat Daerah* (regional government agencies)
PDB	*Penanganan Darurat Bencana*
PVE	*Penelaahan, Verifikasi dan Evaluasi*
PFB	Pooling Fund Bencana

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PMK	*Peraturan Menteri Keuangan* / Ministry of Finance Regulation
PPE	Personal Protective Equipment
PSG	Primate Specialist Group
RHA	Risk and Hazard Assessment
RNA	Rapid Needs Assessment
RKL–RPL	*Rencana Pengelolaan Lingkungan dan Rencana Pemantauan Lingkungan*
RKUN	*Rekening Kas Umum Negara*/ State General Treasury Account
SEAH / SH	Sexual Exploitation, Abuse, and Harassment
SEP	Stakeholder Engagement Plan
SGA	Section on Great Apes
SKPDB	*Sistem Komando Penanganan Darurat Bencana* (Disaster Emergency Response Command System)
SLS	*Standar Lingkungan dan Sosial*
SPPL/	*Surat Pernyataan Pengelolaan Lingkungan*/
SEMMC	Statement of Environmental Management and Monitoring Capability
SPM	*Standar Pelayanan Minimum*/Minimum Service Standards
SSC	Species Survival Commission
TCL	Tiger Conservation Landscape
TOR	Term of Reference
TRC	*Tim Reaksi Cepat (*Rapid Response Team)
UU	*Undang-Undang/* Law
UKL–UPL/	*Upaya Pengelolaan Lingkungan dan Upaya Pemantauan Lingkungan*
EMME	Environmental Management Efforts and Monitoring Efforts
VAC	Violence Against Children
VU	Vulnerable (IUCN Criteria)
WASH	Water, Sanitation, and Hygiene
WWF	World Wildlife Fund
WB	World Bank

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CHAPTER 1.
INTRODUCTION

1.1. BACKGROUND

Indonesia is highly susceptible to natural disasters as it is situated along the Pacific "Ring of Fire. With its extensive archipelago spanning over 5,100 km^2 and being home to 127 active volcanos (Ministry of Energy and Mineral Resources, 2024)[1], the country faces significant disaster risks. According to *Badan Nasional Penanggulangan Bencana* (BNPB), a total of 42,397 natural disasters were recorded between 2015 and 2025 encompassing both hydrometeorological and geological hazards (*Indonesia Disaster Information Data* (DIBI), 2025)[2].

Disasters may impose significant financial burdens for both mitigation and recovery efforts, and may escalate economic losses if adequate mitigation, preparedness, and risk transfer measures are not properly implemented. Between 2000 and 2016, the average of direct economic losses from damaged buildings and infrastructures were around Rp 22,8 trillion per year (Meilano, et al, 2018)[3]. Furthermore, Figure 1.1 illustrates the government disaster fund allocation compared to actual economic losses incurred[4]. Between 2017 and 2019, disaster-related losses escalated significantly, reaching to Rp 30 trillion, Rp 100 trillion, and Rp 75 trillion, respectively. The Study on Economic Losses from Disasters in Indonesia (2021)[5], projects annual losses of Rp15–20 trillion over the next 50 years. Moreover, non-natural disasters such as the Covid-19 pandemic further highlight systemic vulnerabilities, with global economic growth contracting by 4.3 percent in 2020 and Indonesia's economy shrinking by 2.07 percent in the same year (BPS, 2021)[6].

[1] Ministry of Energy and Mineral Resources (ESDM). Indonesia Volcano Data. 2024.
[2] National Disaster Management Authority (BNPB). Indonesia Disaster Information Data (DIBI). 2025.
[3] Meilano, Irwan, et al. Historical Disaster Database and Estimates of Potential Damage and Losses Due to Disasters in Indonesia. 2018.
[4] Meilano, Irwan, et all. Historical Disaster Database and Estimation of Potential Damage and Losses Caused by Disasters in Indonesia. 2018.
[5] Ministry of Finance, Bandung Institute of Technology (ITB), & World Bank. Study on Economic Losses from Disasters in Indonesia. 2021.
[6] Statistics Indonesia (BPS). Indonesia Quarterly Economic Growth. 2021.

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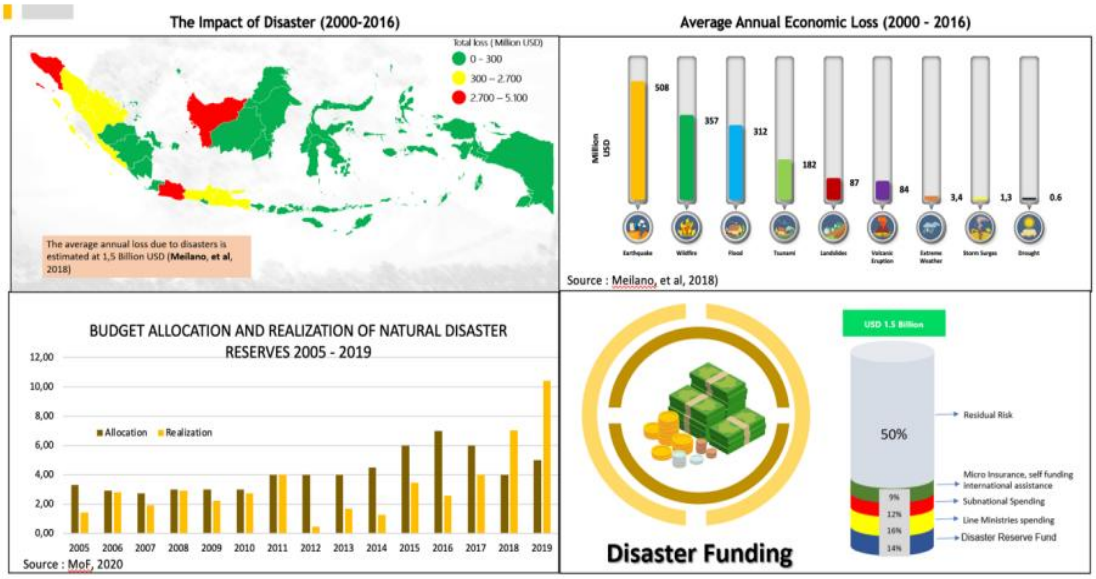

Figure 1.1. The Impact of Disasters on Indonesia's State Budget (APBN)

The government continues to face limitations in financing large-scale disaster management. For example, the 2004 earthquake and tsunami in Aceh and North Sumatra caused economic losses of up to IDR 51.4 trillion (USD 3.5 billion), while the State Budget (APBN)'s annual allocation for disaster risk mitigation is only around IDR 3-10 trillion. These losses far exceed the available disaster reserve fund, which has been valued at IDR 5-10 trillion over the past five years (PFB Annual Report, 2024)[7]. To address this gap, since 2018 the government, through the Ministry of Finance, has implemented Disaster Risk Financing and Insurance Strategy (DRFI). This strategy aims to strengthen community resilience to disasters and ensure sustainable development by providing financing mechanisms that are adequate, well-planned, timely, targeted, sustainable, and transparent. One of the main pillars of the DRFI is the establishment of the Pooling Fund Bencana (PFB), which is designed to protect state budget from the impacts of disasters through mechanisms that involves fundraising, investment, and fund channeling through disaster management activities and risk transfer.

The establishment of the PFB is based on Presidential Regulation No. 75 of 2021 concerning Disaster Management Pooling Fund or Pooling Fund Bencana (PFB) while the PFB mechanism is implemented by the government as mandated in the Minister of Finance Decree (KMK) No. 407 of 2021 concerning the Assignment of the Head of the Indonesian Environment Fund (IEF/BPDLH) and Ministry of Finance Regulation No. 28 of 2025 concerning the Management of

[7] Indonesian Environment Fund (IEF/BPDLH). Pooling Fund Bencana Annual Report. 2024.

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the Disaster Management Pooling Fund (PFB). The technical fund distribution carried out through BPDLH. This process is guided by official recommendations from BNPB, which incorporate coordination with the Coordinating Ministry for Human Development and Cultural Affairs, cross-ministerial reviews and considerations involving the Ministry of Finance, the Ministry of National Development Planning/ BAPPENAS, and the Ministry of Home Affairs.

The utilization and distribution of PFB are further regulated in the BNPB Regulation No. 1 of 2024 concerning Review, Verification, and Evaluation of the Disbursement of Disaster Management Pooling Fund[8], establishes the mechanisms for review, verification, and evaluation of PFB fund disbursement for pre-disaster and post-disaster activities. To manage environmental and social risks and impacts and maximize benefits for affected communities and environment, the regulation mandates that all PFB-funded activities to comply with environmental and social management system standards. Furthermore, the overall environmental and social standards of PFB, its governance, and supplementary instruments are defined within this Environmental and Social Management System (ESMS).

1.2. THE DESCRIPTION OF POOLING FUND BENCANA (PFB)

Presidential Regulation No. 75 of 2021 concerning Disaster Management Pooling Fund establishes the Disaster Pooling Fund/Pooling Fund Bencana (PFB) to complement and expand the availability of disaster management financing that is adequate, timely, targeted, well-planned, and sustainable through six strategic themes. These themes include: (i) PFB fundraising, (ii) fund development, (iii) fund disbursement, (iv) risk transfer through insurance schemes, (v) national and sub-national coordination, and (vi) strategic partnerships and governance.

The PFB functions as a mechanism for raising, developing, and disbursing disaster funds, enabling the government to maintain a multi-year, flexible source of financing that can be utilized during the pre-disaster, emergency response, and post-disaster phases. In addition, the PFB can be used to support risk transfer instruments, such as financing disaster insurance premiums or government asset insurance, thereby strengthening the overall effectiveness of the disaster financing strategy.

PFB funds may originate from the State Budget (APBN), Sub-National Budget (APBD), and other legitimate sources of funds, including insurance or sharia insurance claim receipts, investment returns from managed funds, grants, cooperation proceeds, as well as trust funds from both

[8] BNPB Regulation No. 1 of 2024 concerning Review, Verification, and Evaluation of the Disbursement of Disaster Management Pooling Fund.

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domestic and international sources.[9] The funds accumulated in the PFB will be developed through short-term and long-term investment instruments and subsequently disbursed to eligible proponents. PFB funds may be accessed by ministries/agencies, regional governments, and community groups, with priority is given to: (a) activities aligned with the national or sub-national disaster management plans; (b) activities in areas with a high disaster risk index; (c) activities outlined in post-disaster rehabilitation and reconstruction plans; and/or (d) activities consistent with the minimum service standards related to disaster management.

As the institution responsible for PFB, the Ministry of Finance oversees and evaluates the overall performance of the funds, including funds mobilization, investment, risk transfer, and disaster risk management activities supported by PFB. According to Minister of Finance Decree (KMK) No. 407 of 2021 concerning the Assignment of the Head of the Indonesian Environment Fund (IEF/BPDLH) to Implement the Management of Disaster Pooling Funds (PFB), BPDLH is responsible for daily monitoring and evaluation of PFB's performance, particularly regarding fund mobilization, investment, and disbursement. While BPDLH manages multiple environmental and climate-related financing instruments under the Ministry of Finance, this ESMS applies specifically to the management and disbursement of PFB. In this context, BPDLH channels funds to support selected disaster risk reduction and mitigation activities following the evaluation of proposals submitted to BNPB. In addition, BNPB monitors the technical performance of PFB proponents in relation to their proposed disaster management activities.

The disbursement of PFB funds for disaster management activities is carried out through two mechanisms, such as:

1. Pre-Disaster and Post-Disaster Phases

PFB disbursement is carried out following the submission of a proposal from ministries/ agencies and/or regional governments, including community groups, to BNPB. BNPB then undertakes a review, verification, and evaluation, and provides recommendations to the Minister of Finance as the basis for disbursement. The proposal selection process requires coordination with the Coordinating Ministry for Human Development and Cultural Affairs and consideration from relevant ministries, namely the Ministry of Finance, the Ministry of National Development

[9] Republic of Indonesia, Presidential Regulation No. 75 of 2021 on the Disaster Management Pooling Fund or Pooling Fund Bencana (PFB) (Jakarta: State Secretariat, 2021), Article 4.

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Planning/ BAPPENAS, and the Ministry of Home Affairs. BNPB will submit the funding recommendations to the BPDLH, and the proponents can initiate the budget allocation process[10].

2. Emergency Response Phase

The disbursement of PFB during emergency response follows a specific mechanism as regulated under Regulation of the Ministry of Finance No. 28 of 2025 concerning the Management of Pooling Funds for Disaster Management/PFB. For emergency response, there is no requirement to submit activity proposals; instead, a rapid fiscal mechanism is applied to address urgent needs. Emergency response funds may originate from the accumulated returns of PFB investments as well as from the PFB Principal Fund.

There will be two conditions where PFB could be the funding source for emergency activities: (i) non-principal funds (i.e., generated from PFB principal fund) can be added into the disaster reserve fund if the latter has been depleted; (ii) principal funds can be accessed and added into the reserve fund, if there is a national emergency status declared by the President and both original reserve fund and non-principal PFB funds have been completely depleted. In both conditions, the reserve funds will be used to top-up On-Call Budget (*Dana Siap Pakai*/DSP). To initiate disbursement, the Directorate General of Budget (DJA) submits a request for additional emergency response fund reserves to the Minister of Finance, who will approve and determine the allocation of such reserves within the State General Treasurer's (BUN) budget. Subsequently, the BPDLH may deposit funds equivalent to the additional disaster reserve into the State General Cash Account (RKUN) to finance emergency response activities in accordance with statutory provisions.

Therefore, the use of PFB funds for emergency activities will rely on mechanism of On-Call Budget/DSP as regulated under the Head of BNPB Regulation No. 4 of 2020 concerning On-Call Budget/*Dana Siap Pakai* (DSP). The DSP may be utilized for the procurement of goods and/or services necessary for emergency response and disaster relief activities, whether implemented by BNPB, local disaster management agencies (BPBD), or other relevant ministries/agencies. Therefore, the disbursement of PFB for emergency response activities follows the provisions of this regulation. In general, the operational scheme of the PFB can be illustrated in Figure 1.2. Pooling Fund Bencana (PFB) Business Process.

[10] Ministry of Finance Regulation No. 28 of 2025 on the Management of the Disaster Management Pooling Fund (PFB) (Jakarta: Ministry of Finance, 2025).

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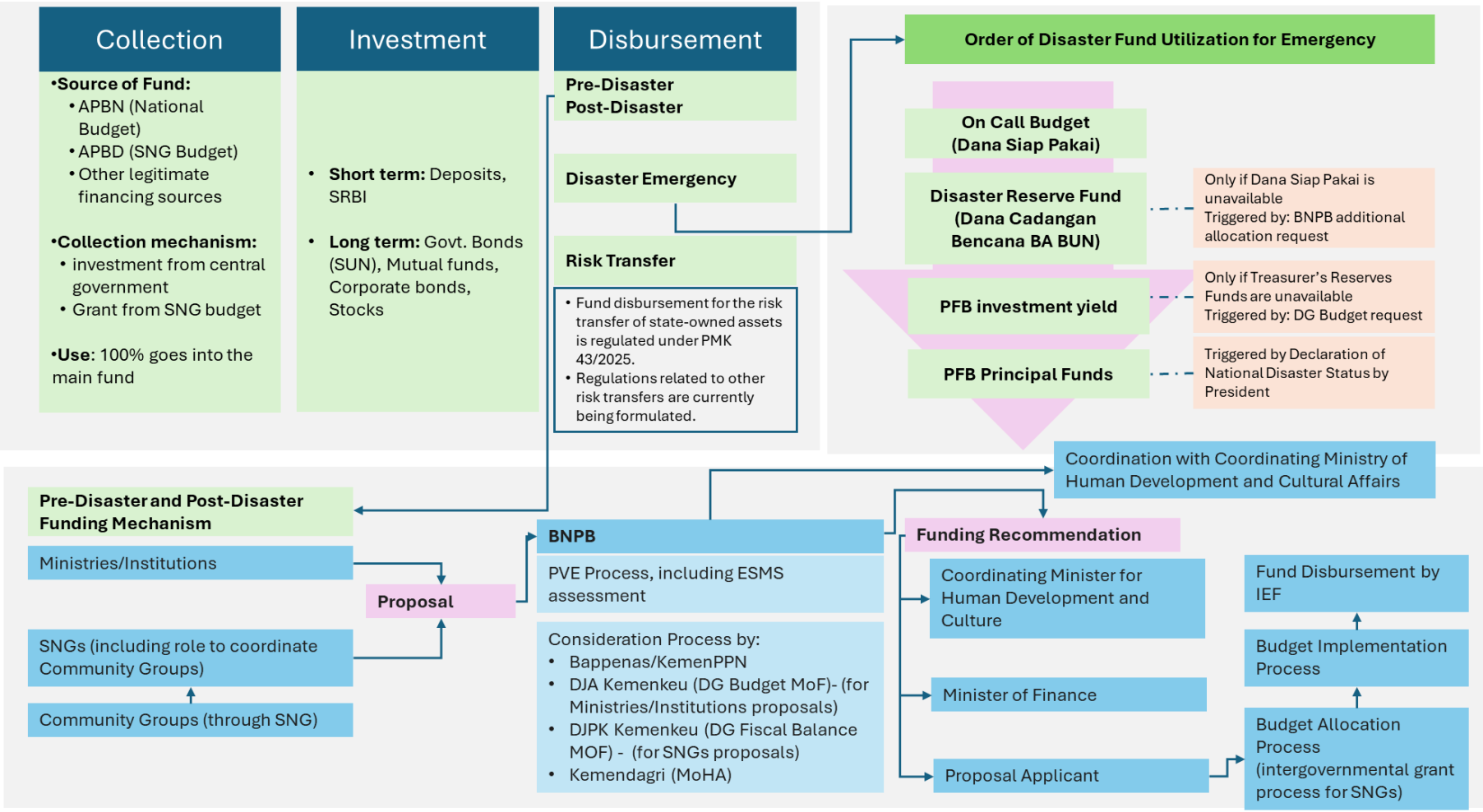

Figure 1.2. Pooling Fund Bencana (PFB) Business Process

Source: DJSEF, 2025

The governance for the PFB business process involves multiple agencies with defined mandates and accountability for fund management and channeling, as well as for the assessment, verification, and monitoring of PFB-funded activities. The allocation of roles and responsibilities, decision-making authority, and institutional arrangements is further described in Chapter 6. In line with the governance and organizational structure, Chapter 7 also presents capacity-building measures, including a training plan to support effective and sustained implementation. These arrangements are further underpinned by the financial management for this ESMS outlined in Chapter 11.

1.3. OBJECTIVES AND SCOPES OF ESMS

1.3.1. Objectives

This ESMS has been developed to outline the set of policies, processes, and procedures applied by the Government of Indonesia to manage environmental and social impacts and risks associated with the operation of the PFB. The document sets forth the requirements, processes, and arrangements necessary to address environmental and social risks arising from PFB fund disbursement activities and explains the environmental and social management measures that must be adopted by PFB proponents.

More specifically, the establishment of the PFB ESMS encompasses the following objectives:

- Mitigate the potential emergence of adverse environmental and social risks and impacts, while enhancing the positive outcomes of PFB implementation.
- Provide a guideline to implement environmental and social management across all activities supported by PFB operations.
- Establish a basis for monitoring and evaluation related to environmental and social safeguards throughout the activity cycle, covering planning, implementation, and closure stages of activities financed by PFB.

Ensure effective implementation of environmental and social risk management in compliance with national regulations and alignment with relevant international standards.

1.3.2. Scopes

The scope of this ESMS covers the management of environmental and social aspects across all financing administered by the PFB to support disaster management activities, pre-disaster,

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emergency response, and post-disaster,[11] with risk levels ranging from low, moderate, substantial, to high. This ESMS also encompasses the regulatory framework and environmental and social standards, procedures for assessing and managing environmental and social risks and impacts, institutional and organizational arrangements, monitoring and capacity development, stakeholder engagement strategies, grievance redress mechanisms, as well as the provision of relevant resources and technical support, including budget allocation for the overall implementation of the ESMS.

This ESMS refers to national regulations on environmental and social management as well as international standards, particularly the World Bank's Environmental and Social Standards (ESS).The development of the ESMS is carried out in stages through legal and capacity framework assessments, institutional reviews of fund administrators, preparation of ESMS procedures, and provision of technical support for environmental and social management. The ESMS provides procedural flexibility to accelerate the processing of emergency disaster funding requests, with integrated contingency measures for extraordinary events (such as large-scale natural disasters and/or health pandemics). The ESMS also ensures that compliance efforts are consistently implemented, monitored, and periodically evaluated across all activities.

1.3.3. ESMS Development

This ESMS has been prepared jointly by BNPB, BPDLH, and the Ministry of Finance in accordance with national regulations related to the PFB and has undergone a consultation process with relevant stakeholders to obtain inputs for refining the draft document. Stakeholder consultations have been conducted several times, from the initial drafting stage of the ESMS until the finalization of the ESMS document. The detailed consultations are served in Annex 1.

The ESMS document is available in both Indonesian and English and can be publicly accessed through the BNPB website, as well as the websites of BPDLH and the Ministry of Finance. The ESMS is a living document that can be continuously updated based on monitoring and evaluation results, as well as stakeholder feedback.

[11]The pre-disaster phase is the stage of preparation before a disaster occurs, encompassing prevention, preparedness, mitigation, and early warning activities. The emergency disaster phase is the stage of direct response during a disaster, focusing on rescue operations and the provision of basic needs, including the rescue and evacuation of victims and assets, provision of essential supplies, protection, management of displacement, and restoration of infrastructure facilities. The post-disaster phase is the stage after a disaster, focusing on recovery, rehabilitation, and reconstruction.

1.4. ESMS IMPLEMENTATION ROADMAP

The ESMS implementation is designed to align with the disaster risk financing and insurance strategy under the PFB, as well as the readiness of the PFB program to support activities and/or activities with varying types of environmental and social risks. ESMS implementation is carried out in stages, in line with the PFB disbursement strategy, which initially focuses on activities with lower environmental and social risks (low to moderate) before expanding its support to activities that encompass a broader range of environmental and social risks. This phased approach allows for the assessment of the maturity and effectiveness of the PFB program prior to allocating funds for broader disaster risk intervention activities with diverse environmental and social risk levels.

The ESMS can be adapted and continuously improved to strengthen the operational resilience of the PFB. It will be maintained through regular monitoring to support sustainable operationalization, accompanied by routine evaluations to ensure effectiveness and compliance. Detailed guidance on ESMS monitoring is provided in Chapter 10. In addition, any changes in regulations, organizational or governance structures, or major environmental and social incidents or grievances should trigger a review of the ESMS.

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CHAPTER 2.
POTENTIAL POOLING FUND BENCANA (PFB) ACTIVITIES

2.1. ACTIVITIES FINANCED BY POOLING FUND BENCANA (PFB)

Activities financed by the PFB include disaster management activities in the pre-disaster[12], emergency response, and post-disaster phases. The ESMS for the PFB will address the disbursement of funds for activities across those phases.

2.1.1. Pre-Disaster Activities

Pre-disaster activities refer to disaster management measures undertaken in the absence of an actual disaster, aimed at addressing potential disaster risks and reducing future impacts. These activities primarily aim to support prevention, mitigation, and preparedness. BNPB Implementation Guidelines (*Petunjuk Pelaksanaan/ Juklak*) No. 4 of 2025 on the Review, Verification, and Evaluation of the Disbursement of PFB in the Pre-Disaster Phase[13] establishes four principal typologies of pre-disaster activities that may be financed under the PFB:

1. Planning and Policy Development.
2. Prevention, consisting of mitigation, preparedness, and early warning.
3. Logistics and Equipment.
4. Capacity and Professional Development, including training, technical guidance, professional development, and practice exercise.

The table containing the list of pre-disaster activities can be found in Annex 2a.

2.1.2. Emergency Response Activities

Emergency response activities are disaster management measures undertaken immediately at the onset of a disaster to address its adverse impacts. These activities encompass search and rescue operations, evacuation of affected persons and property, provisions of basic needs, protection of vulnerable groups, management of refugees, and restoration of critical infrastructures and facilities. The BNPB Regulation No. 4 of 2020 concerning the Use of On-Call

[12] Presidential Regulation No. 75 of 2021 on Disaster Management Pooling Fund or Pooling Fund Bencana (PFB), Minister of Finance Regulation No. 28 of 2025 on the Management of the Disaster Management Pooling Fund (PFB), BNPB Regulation No. 1 of 2024 concerning Review, Verification, and Evaluation of the Disbursement of the Disaster Management Pooling Fund (PFB).
[13] BNPB Implementation Guidelines No. 4 of 2025 on the Review, Verification, and Evaluation of the Disbursement of PFB in the Pre-Disaster Phase.

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Budget regulates the scope of 14 activities eligible for PFB funding during the emergency response phase. The complete list of emergency response activities is detailed in Annex 2b.

2.1.3. Post-Disaster Activities

Post-disaster activities encompass rehabilitation and reconstruction measures designed to restore resilience among disaster-affected communities. These efforts aim to enable recovery from adversity through the application of the build back better principle, ensuring that reconstruction is safer, more sustainable, and firmly grounded in disaster risk reduction. Implementation emphasizes the integration of local wisdom to strengthen social cohesion and ensure that recovery processes are contextually appropriate and inclusive.

BNPB Implementation Guidelines No. 1 of 2025 on the Review, Verification, and Evaluation of the Disbursement of PFB for Post-Disaster Phase establishes five main sectors of post-disaster activities that may be financed under the PFB, such as:

- Housing Sector – rehabilitation and reconstruction of housing, including the restoration and rebuilding of residential structures affected by disasters.
- Infrastructure Sector – rehabilitation and reconstruction of infrastructure, consisting of the repair and upgrading of vital facilities such as roads, bridges, and public utilities.
- Economic Sector – encompassing community empowerment activities and the development or improvement of facilities in agriculture, plantations, livestock, fisheries, industry, tourism, cooperatives, and Micro, Small, and Medium Enterprises (MSMEs).
- Social Sector – encompassing community empowerment activities and the development or improvement of facilities in health, education, religious institutions, cultural preservation, and social welfare organizations.
- Cross-Sector Rehabilitation and Reconstruction – including the rehabilitation and reconstruction of government infrastructure, forest and land rehabilitation, coastal area rehabilitation, watershed (DAS) conservation, waste and wastewater management, and sustainable agricultural practices.

The table containing the list of post-disaster activities based on the sectors outlined above can be found in Annex 2c.

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2.2. POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

The potential environmental and social (E&S) risks of activities financed under the PFB will be assessed and determined based on an E&S appraisal that considers the scale of intervention, characteristics of the activity location, severity of potential impacts, and capacity of proponents. In general, the risk level of PFB-financed activities may range from low to high, with potential impacts including occupational and community health and safety concerns, air pollution, land due diligence, habitat loss, disturbances to indigenous peoples and cultural heritage, as well as potential disruptions to livelihoods. Several pre-disaster activities, as well as emergency response and post-disaster activities, are likely to target disaster-prone areas and may potentially be carried out in locations where indigenous peoples reside or in areas that are environmentally and socially sensitive[14], which may pose significant E&S risks and impacts.

This section provides an overview of potential E&S risks and impacts by the disaster management phases. While specific activity scales and detailed risk classifications are determined through proponent assessment as outlined in Chapter 4, the following characterization provides indicative guidance on the types of risks, their expected scale, and management opportunities across pre-disaster, emergency response, and post-disaster phase.

2.2.1. Pre-Disaster Phase

Pre-disaster activities generally cover planning, policy formulation, training, capacity building, the development or strengthening of disaster prevention facilities, as well as the provision and distribution of logistics and equipment. Activities such as planning, policy formulation, training, and capacity building typically do not involve physical works, are conducted within a limited timeframe, and generate minimal adverse impacts on the environment and pose low risk for proponents. Based on these characteristic, the E&S risk level is considered low to moderate, reflecting potential impacts such as domestic waste generated during activities, occupational health and safety risks in office environments and official travel, community involvement in consultation or policy formulation processes, or manageable disturbances to indigenous peoples, habitats, and cultural heritage resulting from disaster simulations, logistics distribution, or field assistance conducted in environmentally or socially sensitive areas. Several pre-disaster activities may involve small-scale constructions, such as the installation of warning signs,

[14] For instances, areas with high biodiversity, coastal zones, locations in proximity to cultural heritage sites, or areas adjacent to restricted zones, protected forests, and conservation areas.

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reinforcement of preparedness facilities, or vegetation planting. These activities may pose moderate risks related to noise, dust, waste generation, traffic disruption, and occupational or community safety. However, land impacts are expected to remain minimal, as such small-scale construction is generally undertaken within existing sites.

Pre-disaster activities that may generate higher levels of risk include the construction of infrastructure and mitigation facilities, the development of preparedness and early warning systems, the enhancement of water bodies' capacity, and other physical works that potentially require land acquisition. These activities are generally implemented over longer periods, involve work with elevated occupational health and safety risks, and may result in impacts that are not easily reversible in the short term. Potential environmental and social impacts may encompass restricted access and traffic disruption, noise, dust, hazardous waste generation, and land degradation, all of which can affect occupational health and safety as well as community health and livelihoods. In addition, such activities may involve land acquisition and resettlement, disturbance of habitats and cultural heritage, and the emergence of social conflict within affected communities.

2.2.2. Emergency Response Phase

The emergency response phase typically requires rapid, intensive, and well-coordinated actions. Activities during this phase range from rapid assessment to the execution of emergency operations. In accordance with the Head of BNPB Regulation No. 3 of 2016 concerning on the Disaster Emergency Command System, a Disaster Emergency Status is defined as an emergency condition formally declared by the Government or local government for a specific period, based on a recommendation from the agency responsible for disaster management, and it applies across the stages of emergency alert, emergency response, and emergency transition to recovery. This phase includes immediate life-saving activities such as search and rescue, emergency aid, health services, and temporary shelters provision. These crucial activities, which are governed by BNPB Regulation No. 4 of 2020 concerning the Use of On-Call Budget (*Dana Siap Pakai*/DSP)[15] and the Implementation Guidelines on the Use and Accountability of On-Call Budget which are attached in this regulation, inherently entail specific environmental and social risks. For example, search, victim evacuation, and emergency relief activities are an operational activity involving the deployment of resources, such as the use of heavy equipment for search and evacuation which may pose environmental risks such as from the use of heavy equipment

[15] BNPB Regulation No. 4 of 2020 concerning the Use of On-Call Budget (*Dana Siap Pakai*/DSP).

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that often generates hazardous and toxic waste (*limbah Bahan Beracun dan Berbahaya*/B3) for instances spilled fuel, used oil, or used batteries, which can potentially contaminate soil and water at the disaster site. Rapid search and rescue processes can overlook biological waste management (e.g., handling of human or animal remains), posing a risk of infection and environmental contamination. In terms of social risks, it may potentially generate Occupational Health and Safety (OHS) issues such as incidents from heavy equipment operations and search & rescue activities. Also, potential Sexual Exploitation and Abuse/ Sexual Harassment (SEA/SH) for rescue teams and surrounding communities. In addition, poor coordination of rescue efforts may endanger affected community members.

The provision of food, clothing, and shelter services may pose environmental risks, including increased volumes of non-hazardous waste. Mass distribution of food and clothing assistance often generates significant plastic waste such as instant food packaging, bottles, and clothing wrappers which can accumulate at evacuation sites due to the absence of adequate emergency waste management infrastructure. Emergency shelter and tent construction may involve land use, without adequate assessment, potentially resulting in land degradation and damage to local ecosystems or water catchment areas. From social perspectives, risks include inequitable access to aid distribution particularly when food and clothing assistance is not culturally appropriate (e.g., dietary restrictions, religious practices, or special needs for infants and the elderly) or lacks transparency which may generate social tensions. In addition, inadequate shelter facilities and services for vulnerable groups, such as the absence of accessibility features for persons with disabilities or the lack of safe spaces, may lead to community health and safety risks, SEA/SH risks, exclusion, and discrimination. Conflicts may also arise from the use of temporary land for emergency shelters when locations are determined without proper consultation, of which potentially triggering disputes with landowners or nearby communities.

2.2.3. Post-Disaster Phase

The post-disaster phase encompasses a set of recovery and reconstruction activities designed to restore essential services, rehabilitate affected communities, and rebuild damaged infrastructure. Two key activities in this phase, for instance, debris clearance and waste management and reconstruction of houses and public facilities, each of which carries distinct environmental and social risks that must be managed under the ESMS.

Debris clearance and waste management, these activities involve the removal, transportation, temporary storage, and final disposal of debris generated by the disaster, including rubble, damaged materials, fallen trees, and hazardous waste. Potential environmental risks may include

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soil and water contamination arising from improper disposal of chemical, medical, or asbestos-containing materials; air and noise pollutions from the heavy machineries; and disturbance of ecosystems if debris is disposed of in unauthorized locations. Social risks may include significant occupational health and safety risks for workers handling hazardous debris, as well as risks to surrounding communities from inadequate site controls. Additionally, poor coordination in debris removal activities may result in the loss of personal or culturally significant items, generating grievances among affected communities.

Reconstruction of houses and public facilities entails the rebuilding of residential housing, schools, health centers, and critical infrastructure such as water supply systems and roads. Environmental risks may include land degradation, such as erosion from construction activities, unsustainable extraction of natural resources such as timber and sand, increased generation of construction waste, and potential disruption of habitats. Social risks may arise from unsafe construction practices, inequitable access to reconstruction assistance, and the exclusion of vulnerable groups from planning or rebuilding processes. In some cases, reconstruction may also trigger land tenure disputes, exacerbate livelihood disruptions, or create tensions if communities perceive that supports are distributed unfairly.

To ensure the effective management of environmental and social risks and impacts of activities financed under the PFB, Chapter 4 of this ESMS further provides guidance on screening, risk classification, and mitigation measures in accordance with the risk level of each activity.

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CHAPTER 3.
PFB ENVIRONMENTAL AND SOCIAL REGULATORY FRAMEWORK

3.1. PFB ENVIRONMENTAL AND SOCIAL POLICY

The E&S PFB policy emphasizes two main aspects: **commitments** and **standards,** that are the basis for the implementation of ESMS at every stage of fund management.

3.1.1. Environmental and Social Commitment

The PFB's E&S commitments are manifested through regulations governing PFB management and the government's commitment to fulfilling E&S requirements in the administration of the PFB, including:

1. **Law/ *Undang-Undang (UU)***
   a) Law No. 24 of 2007 concerning Disaster Management. This law provides the overarching legal framework for disaster management across all phases such as pre-disaster, emergency response, and post-disaster. It recognizes disasters as events that may cause loss of life, environmental damage, social and psychological impacts, and disruption of livelihoods, thereby requiring the government to protect affected communities, particularly vulnerable groups. This law acknowledges that the implementation of disaster management activities should consider the social, economic, and cultural aspects of the community, as well as environmental sustainability.

   b) Law No. 32 of 2009 concerning Environmental Protection and Management (*Perlindungan dan Pengelolaan Lingkungan Hidup*/PPLH). This law emphasizes environmental protection through requirements for AMDAL/UKL-UPL/SPPL[16], pollution control, and ecosystem restoration. It recognizes social aspects, including public participation and the rights of pollution victims.

2. **BNPB Regulations**

BNPB Regulation No. 1 of 2024 concerning Review, Verification, and Evaluation of the Disbursement of Pooling Fund Bencana (PFB). This regulation governs PFB disbursement mechanisms for pre- and post- disaster phases, including verification and fulfillment of

[16] *Analisis Mengenai Dampak Lingkungan* (AMDAL); *Upaya Pengelolaan Lingkungan Hidup dan Upaya Pemantauan Lingkungan Hidup* (UKL-UPL); *Surat Pernyataan Pengelolaan Lingkungan* (SPPL).

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environmental and social (E&S) requirements. It emphasizes transparency and accountability in PFB management and addresses environmental management in disaster response.

During the emergency response phase, most E&S aspects have been covered within multiple regulatory instruments rather than outlined as a single E&S commitment. A detailed discussion of these commitments is provided in Subchapter 3.2.

3.1.2. Environmental and Social Standard / Standar Lingkungan dan Sosial (SLS)

Environmental and Social Standards/ *Standar Lingkungan dan Sosial* (SLS) for PFB are designed to avoid, minimize, reduce, or mitigate the risks and adverse impacts of E&S on the implementation of PFB-financed activities. In accordance with BNPB Implementing Guidelines No. 2 of 2025 on the Environmental and Social Management System for the Disbursement of the Disaster Pooling Fund in the Pre-Disaster Phase, BNPB has adopted SLS based on national regulations and international standards, including the World Bank Environmental and Social Standard (ESS)[17] and World Bank Environmental, Health, and Safety / EHS[18]. The explanation of each SLS is as follows:

SLS 1: Assessment and Management of Environmental and Social Risks and Impacts

This standard emphasizes the responsibility of the proponent of the activity to assess, manage and monitor the risks and impacts of the E&S associated with the distribution of PFB and the implementation of the activities supported by such funding, in order to achieve E&S management performance in accordance with the SLS PFB. The implementation of these standards ensuring that the assessment and management of E&S risks and impacts is included in PFB's operational procedures, adopting a hierarchy of mitigation[19] and measures to avoid, minimize, reduce/ mitigate and off set certain risks and impacts of the activity, encouraging capacity building and performance of the E&S initiators of the activity, drafting and implementing E&S commitments according to the level of risk and impact of the activity, conduct monitoring and reporting, and identify corrective actions if necessary. This standard also applies to Associated Facilities[20].

[17] https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf

[18] https://www.ifc.org/content/dam/ifc/doc/2000/2007-general-ehs-guidelines-en.pdf.

[19] A hierarchy of mitigation is used to anticipate and avoid risks and impacts: (a) If avoidance is not possible, minimize or reduce the risk and impact to an acceptable level; (b) Once the risks and impacts have been minimized or reduced, take mitigation; and (c) If significant residual impacts remain, compensate, if technically and financially possible.

[20] Associated Facilities a means facilities or activities that are not funded as part of the activity and, in the judgment of the Bank, are: (a) directly and significantly related to the activity; (b) carried out, or planned to be carried out, contemporaneously with the activity; and (c) necessary for the activity to be viable and would not have been constructed, expanded or conducted if the activity did not exist.

SLS 2: Labor and Working Conditions

This standard recognizes the importance of employment creation in the pursuit of poverty reduction and inclusive economic growth. PFB disbursement and its funded activities shall promote sound workers and management relationships and enhance the development benefits of funded activities by treating workers fairly and providing safe and healthy working conditions. This standard ensures employment procedures promote occupational safety and health, fair treatment, non-discrimination, and equal opportunities for workers; protecting activity workers; prevent the use of all forms of forced labor and child labor; support freedom of association and the provision of grievance mechanisms in the workplace.

SLS 3: Resource Efficiency and Pollution Prevention and Management

This standard promotes the realization of a sustainable environment in the implementation of activities by paying attention to the potential environmental risks and impacts, such as increased air, water, and soil pollutions, as well as resource exploitations that may have negative impacts on humans, ecosystems, and the environment at the local, regional, and global levels, including increased greenhouse gas concentrations. This standard will ensure the disbursement of PFB fund is not used for activities that significantly pollute the environment or cause resource inefficiencies. This standard focuses to promote the sustainable use of resources (such as energy, water, and raw materials), avoid, or minimize pollution and climate pollutants that have a short- and long-term impact on the climate, reduce the generation of hazardous and non-hazardous wastes, and minimize the risk of pesticide use that can harm human health and the environment.

SLS 4: Community Health and Safety

This standard recognizes that the implementation of activities, equipment, and infrastructure can increase community exposure to risks and impacts of community health and safety which includes aspects such as security, emergency response plans, traffic impacts such as noise and dust, the spread of diseases, and construction impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to the implementation of activities. This standard integrates community health and safety aspects that include climate change considerations in the design and construction of infrastructure, traffic and road safety, exposure to diseases and hazardous materials, and management of emergency events. The standard also emphasizes the importance of

safeguarding personnel and property, as well as prevention against violence, harassment, or sexual exploitation (SEA/SH), in order to protect the activity-affected communities.

SLS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This standard recognizes that activities related land acquisition, involuntary resettlement, and land use restrictions can have adverse impacts on individuals and communities since they can lead to physical displacement (relocation, loss of residential land, or loss of shelter), economic displacement (loss of land, assets, or access to assets, leading to loss of income sources or other means of livelihood), or both. The term "involuntary resettlement" refers to these impacts. Resettlement is considered involuntary when the affected person or community lacks the right to refuse land acquisition or land use restrictions that result in displacement. This standard ensures procedures are in place to avoid involuntary resettlement or, if unavoidable, minimize involuntary resettlement by exploring activity design alternatives, avoiding forced evictions, and mitigating adverse and unavoidable social and economic impacts resulting from land acquisition or land-use restrictions.

SLS 6: Biodiversity Conservation and Sustainable Management of Living Natural

This standard acknowledges that protecting and conserving biodiversity, as well as sustainably managing living natural resources are essential to achieving sustainable development. Biodiversity is defined as the variability among living organisms from all sources, including, inter alia, terrestrial, marine, and other aquatic ecosystems, and the ecological complexes of which they are a part; this includes diversity within species, between species, and ecosystems. Biodiversity often underpins ecosystem services valued by humans. Impacts on biodiversity can therefore often adversely affect the delivery of ecosystem services. The implementation of this standard focuses on the protection and conservation of biodiversity and its habitats, the application of a hierarchy of mitigation and the precautionary approach in the design and implementation of activities that could have potential impact on biodiversity, efforts to promote the sustainable management of living natural resources, and efforts to support people's livelihoods, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.

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SLS 7: Indigenous Peoples

This standard contributes to sustainable development by ensuring that PFB-funded activities increase opportunities for indigenous peoples (IPs)[21] to participate in and benefit from the process of implementing activities in a way that does not threaten their unique cultural identities and well-being. The SLS includes Customary Communities/ *Masyarakat Hukum Adat* (MHA) with respect to customary law communities or communities that have a collective cultural attachment to the proposed activity area, as determined during the E&S assessment. Adverse impacts on indigenous peoples need to be avoided, or if not possible, minimized, mitigated, and/or adequately compensated. This standard also promotes the creation of inclusive, accessible, and culturally appropriate development benefits through meaningful consultation. In addition, the standard emphasizes the importance of recognition, respect, and preservation of cultures, knowledge, and practices, and the need for the Free, Prior, and Informed Consent/ FPIC (*Persetujuan Atas Dasar Informasi Awal Tanpa Paksaan*/ PADIATAPA) under certain conditions[22].

SLS 8: Cultural Heritage

This standard recognizes that cultural heritage provides continuity in the tangible and intangible forms between the past, present, and future. People identify with cultural heritage as a reflection and expression of their constantly evolving values, beliefs, knowledge, and traditions. Cultural heritage is important as a source of valuable scientific and historical information, as an economic and social asset for development, and as an integral part of people's cultural identity and practices. This standard protects cultural heritage from the adverse impacts of funded activities and supports its preservation by addressing cultural heritage as an essential part of sustainable development. This standard also promotes meaningful consultation with stakeholders and the equitable sharing of benefits from the use of cultural heritage.

[21] In this ESMS, Indigenous Peoples refer to Customary Communities/ Customary Law Communities, considering Minister of Home Affairs Regulation No. 52 of 2014 concerning Guidelines for the Recognition and Protection of Customary Communities. These are Indonesian Citizens who possess distinctive characteristics, live communally in accordance with their customary law, maintain strong ties to ancestral origins and/or shared residences, have a deep attachment with their land and the environment, and uphold a value system that governs economic, political, social, cultural, and legal institutions and utilizes a specific ancestral territories.
[22] PADIATAPA/FPIC is required if the activity have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation; cause relocation of Indigenous Peoples from land and natural resources subject to traditional ownership or customary use or occupation; or have a significant impacts on IPs' cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the lives of the affected Indigenous Peoples.

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SLS 10: Stakeholder Engagement and Information Disclosure

This standard recognizes the importance of open and transparent stakeholder engagement and grievance mechanisms for the PFB disbursement and its activities. Effective stakeholder engagement can improve the E&S sustainability of funded activities, enhance activities acceptance, and make a significant contribution to successful activities design and implementation. This standard establishes a systematic approach to stakeholder engagement, especially for those affected by the activity. This standard includes stakeholder identification and mapping, and ensuring their views are considered in the design and implementation of activities. Inclusive and meaningful engagement is encouraged by the delivery of adequate, timely, and accessible information, as well as the availability of an inclusive and responsive grievance mechanism for affected parties.

3.2. GAP MITIGATION OF E&S NATIONAL REGULATION AND PFB SLS

Indonesia already has a fairly comprehensive legal basis related to E&S protection, including for disaster management activities. The legal basis for E&S management in Indonesia is regulated in various laws such as Law No. 32 of 2009 regarding Environmental Protection and Management, Law No. 6 of 2023 regarding the Stipulation of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation to become Law, Law No. 2 of 2012 concerning Land Acquisition for Development in the Public Interest, Law No. 24 of 2007 concerning Disaster Management, Presidential Regulation No. 75 of 2021 regarding Disaster Management Pooling Fund or Pooling Fund Bencana, and various other laws and regulations. BNPB and relevant ministries/agencies have also issued several regulations, guidelines, and implementation guidelines/ *Petunjuk Pelaksanaan (Juklak)* related to E&S safeguards relevant to the PFB disbursement. The following analysis of the E&S regulations demonstrates that PFB SLS generally aligns with national regulations. Several identified gaps have been addressed through mitigation measures within this ESMS and the harmonization of regulations and policies. Details of gaps and mitigation measures are provided in the table presented in Annex 3.

SLS 1 – Assessment and Management of Environmental and Social Risks and Impacts

Law No. 32 of 2009 and its implementing regulations provide a strong legal basis for the assessment, management, and monitoring of environmental and social (E&S) risks and impacts through SPPL, UKL-UPL, and AMDAL instruments. In the context of PFB, BNPB Implementation Guidelines No. 2 of 2025 introduce the application of the ESMS for the pre-disaster phase and

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strengthen E&S risk management throughout the PFB cycle, supported by BNPB Regulation No. 1 of 2024 and BNPB Implementation Guidelines No. 1 of 2025 through the obligation for proponents to conduct E&S assessment and monitoring. However, the existing regulatory framework remains fragmented, particularly in the management of social risks, vulnerable groups, indigenous peoples, and biodiversity, and has not explicitly required the assessment of associated facilities. Also, the implementation guideline for environmental and social management in the post-disaster phase has not been issued yet and is currently at an advanced stage of finalization. To mitigate these gaps, the PFB ESMS establishes a structured and risk-based framework applicable to all PFB-funded activities, applying E&S risk screening and proportionate management instruments such as supplementary ESIA and ESMP to ensure that E&S risk and impact management is applied consistently across all stages of activities.

SLS 2 – Labor and Working Conditions

Indonesia's labor laws are aligned with ILO core conventions and provide comprehensive protection for workers, including occupational health and safety, freedom of association, elimination of forced and child labor, non-discrimination, and equal pay. The legal framework regulates key employment conditions such as contracts, working hours, leave, minimum wages, employment relations, health insurance, and occupational accident insurance, and includes OHS management requirements, use of personal protective equipment, and prevention and handling of workplace sexual violence. In addition, Regulation of the Minister of Public Works and Public Housing No. 10 of 2021 on the Construction Safety Management System establishes a framework for managing construction safety through the contractor's Occupational Health and Safety (OHS) management system.

BNPB Regulation No. 5 of 2021, as amended by Regulation No. 5 of 2022, requires non-government personnel and volunteers involved in disaster management to be registered under the *Jaminan Sosial Ketenagakerjaan* (social security) program, providing coverage for occupational accidents and death benefits. However, gaps have been identified, including the absence of explicit mechanisms for workers' grievance management and limited regulatory provisions addressing the prevention and response to sexual exploitation, abuse and sexual harassment (SEA/SH). The existing OHS regulations are mostly non-prescriptive, which requires institutions to develop and implement institution specific OHS arrangements to ensure full alignment with SLS 2 requirements. The Labor Management Plan (LMP) for PFB, as part of this ESMS, will provide detailed arrangements for different categories of PFB workers, including direct and contracted workers. The LMP will also include policies and procedures on non-discrimination

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and equal opportunity, prohibition of forced labor, Occupational Health and Safety (OHS), codes of ethics and conduct and response to SEA/SH. In addition, the Grievance Redress Mechanism set out in Chapter 9 will be applied to address workers' complaints and ESCOPs under this ESMS include provisions on occupational health and safety (OHS) requirements that can be used as guidance by proponents.

SLS 3 – Resource Efficiency and Pollution Prevention and Management

Indonesia's national regulatory framework provides a largely comprehensive foundation for the application of SLS 3, covering air quality and emissions, hazardous and non-hazardous waste management, wastewater management, resource efficiency, and pesticide regulation, as well as the management of debris, electronic waste, and hazardous materials arising from pre- and post-disaster activities. End-to-end controls are established for hazardous, medical, and electronic waste management, including waste stream inventories, segregation and labeling, safe storage standards, licensed transport supported by manifest systems, treatment and disposal at licensed facilities, personnel training and PPE requirements, emergency spill response, and reporting and record-keeping to ensure traceability and chain of custody. In parallel, national provisions on environmentally responsible rehabilitation and reconstruction, together with water and energy efficiency regulations, further reinforce alignment with SLS 3.

However, in disaster-specific contexts, certain gaps remain, particularly the absence of explicit and uniform provisions governing the prohibition and management of specific hazardous materials such as asbestos during construction, renovation, and demolition activities, as well as limited regulatory guidance on pesticide management during recovery activities in the agricultural and plantation sub-sectors. To address these gaps, the ESMS consolidates and operationalizes existing regulations through the establishment of a negative list for asbestos-containing materials, application of asbestos management protocols for renovation and demolition activities, integration of safe chemical use (pesticide) management measures into the Environmental and Social Codes of Practices (ESCOPs), and the application of risk and hazard assessments in accordance with Minister of Environment and Forestry Regulation No. 74 of 2019, thereby ensuring consistent application of SLS 3 across all PFB-supported activities.

SLS 4 – Community Health and Safety

National regulations and BNPB implementing guidance provide an adequate framework for managing community health and safety risks under SLS 4 across different disaster management phases. Pre-disaster activities, including the installation of disaster signage and information

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boards, are regulated under BNPB Regulation No. 2 of 2024, which establishes technical and safety standards requiring consideration of site-specific conditions such as location characteristics, soil type, and land slope to ensure community safety. During the rehabilitation and reconstruction phase, community health and safety risks associated with construction activities are addressed through mandatory environmental assessment instruments (AMDAL or UKL–UPL), which require the identification and management of potential impacts on surrounding communities. While national regulations do not explicitly prescribe detailed measures for certain community-facing risks, such as road safety, traffic management, or community emergency response during construction activities, this gap is considered manageable, as such risks are typically addressed through contractor OHS systems, site-specific risk assessments, and coordination with relevant local authorities. The ESMS will further mitigate this gap by integrating community health and safety considerations into the ESCOPs, which will serve as practical guidance for proponents. Furthermore, in disaster management, increased social vulnerability places SEA/SH risks as a key aspect of SLS 4 on community health and safety. Therefore, SEA/SH-related management risks must be integrated into disaster planning and recovery as served in Annex 13.

SLS 5 – Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement

Indonesia's national regulations generally align with SLS 5 in ensuring the protection of affected communities and preventing forced evictions during disaster response, with gaps persisting in regulating compensation and livelihood restoration for people without formal land rights. However, the PFB fund will not be used to acquire land for the proposed activities. In the context of disaster management activities funded by PFB, the regulations require that land use be verified during the proposal development stage to ensure the land's legal status and that proposed activities are not exposed to land-related risks.

This ESMS integrates SLS 5 into operational procedures and relevant instruments, such as mandatory land due diligence for proposed activities informed by the Land Due Diligence Guideline to complement existing disaster management regulations and guidelines. The Land Due Diligence Guideline in Annex 15 defines principles and processes for land due diligence, including due diligence principles, related national regulations and policies, and processes to ensure land status is clean and clear that includes land ownership and tenure verification, ensuring absence of land disputes and encumbrances, ensure there are no involuntary resettlements, and confirm mitigation measure procedures are completed if land clearance involves displacement, including for those already occupying land informally.

SLS 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources

The national regulatory framework has provided a solid basis for the protection of biodiversity and ecosystems, including the establishment and management of conservation areas, the protection of protected species, conservation planning at the regional level, as well as law enforcement against illegal activities that threaten the sustainability of ecosystems, and in the context of disasters it is strengthened by the Head of BNPB Regulation No. 11 of 2008 regarding Guidelines for Post-Disaster Rehabilitation and Reconstruction. This regulation requires post-disaster rehabilitation and reconstruction activities to be carried out in an environmentally friendly manner and maintain ecosystem sustainability. However, there are still gaps with SLS 6, as national regulations do not explicitly regulate the identification and protection of natural and critical habitats, the protection of species and habitats outside formal conservation areas is still limited, there are differences in references between national protected species lists and international classifications such as IUCN, and there have not been systematic regulation of anticipation and management invasive species. To mitigate these gaps, ESMS implements an operational approach through biodiversity screening, assessment, management and monitoring mechanisms, including the implementation of negative lists, E&S screening forms, and Biodiversity Management Frameworks that refer to national conservation areas as well as international reference sources such as the Alliance for Zero Extinction (AZE) and Integrated Biodiversity Assessment Tool (IBAT), as well as the integration of invasive species management into the Environmental and Social Codes of Practices (ESCOPs), so that impacts on biodiversity can be avoided or minimized consistently across all PFB-supported activities.

SLS 7 – Indigenous Peoples

The characteristics of Indigenous Peoples, as defined by the four criteria of international standards, align with national regulations on Customary Communities in Indonesia. Indonesian regulations, such as Law No. 24 of 2007 on Disaster Management and Government Regulation No. 21 of 2008 on the Implementation of Disaster Management also recognizes cultural or local wisdom as a key aspect to be considered in disaster management. Under these regulations, disaster management shall adhere to the principles of gender equality, sustainability, cultural/local wisdom, and participation, while protection activities are required to prioritize vulnerable groups. Those regulations show an alignment with SLS 7 and support the implementation of IP-related measures in disaster management activities. Within this ESMS, planning and engagement with IPs will be included in E&S screening and guided by the Indigenous Peoples Planning Framework

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(IPPF). The IPPF is integrated into ESMS operational procedures to ensure full compliance with SLS 7 requirements and to promote meaningful and respectful engagement with *Masyarakat Hukum Adat* (MHA) throughout the lifecycle of PFB-funded activities.

SLS 8 – Cultural Heritage

Indonesian disaster-management regulations recognize the importance of protecting tangible cultural heritage, but there are opportunities to better align with SLS 8, particularly regarding intangible heritage and community participation. Law No. 24 of 2007 on Disaster Management and Government Regulation No. 21 of 2008 on The Implementation of Disaster Management provides a foundation for the protection of assets and critical infrastructure, though references to cultural heritage (both physical and non-physical) remain implicit. The Guidelines for Disaster-Resilient Cultural Heritage (Ministry of Education, Culture, Research and Technology, 2023) offer detailed procedures for risk and impact assessment of cultural heritage during disaster management activities, as well as its' mitigation measures, risk reduction strategies, and recovery processes, and emphasize the importance of stakeholder engagement including relevant ministries, affected communities, and cultural experts. To ensure compliance with SLS 8, this ESMS incorporates the chance to find procedures into the E&S instruments as part of the operational procedures.

SLS 10 – Stakeholder Engagement and Information Disclosure

National regulations mostly align with requirements on stakeholder engagement and information disclosure. They guarantee citizens' right to information on public policy decisions and promote public participation, including women's participation in development processes. In disaster management, BNPB regulations, and Law No. 24 of 2007 on Disaster Management require the engagement of affected communities, particularly vulnerable groups, across the pre-disaster, emergency, and post-disaster phases. BNPB has also issued specific regulations on gender mainstreaming (Head of BNPB Regulation No. 13 of 2014) and disability inclusion (Head of BNPB Regulation No. 14 of 2014) to ensure the active participation of women and people with disabilities in disaster management activities. In addition, BNPB has established guidelines for grievance redress mechanisms that ensure accessible channels, clear procedures, defined institutional roles, and effective monitoring.

Despite this strong regulatory framework, opportunities remain to further sustain inclusive and meaningful participation and information disclosure. This ESMS ensures full compliance with SLS 10 for all PFB-funded activities through the Stakeholder Engagement Framework in Chapter 8 that sets out requirements for planned, structured, and inclusive engagement, and the responsive

grievance redress mechanism in Chapter 9 that defines procedures for an effective and accessible grievance mechanism.

Environmental and Social Safeguard Regulations and Policies in the Emergency Response Phase

Indonesia's national legal framework provides a strong foundation for disaster emergency response, particularly through the On-Call Budget (DSP) mechanism and various BNPB operational regulations applicable to the emergency response phase.

Several requirements of **SLS 1** have been incorporated into BNPB regulations. These include requirements for the preparation and implementation of emergency response operation plans that minimize environmental impacts, avoid impacts on conservation areas, respect local culture and cultural heritage, integrate gender equality and sustainability principles, promote participation and prioritization of vulnerable groups, and ensure structured coordination and communication with affected communities through the disaster command system and displacement management mechanisms. Although no formal environmental and social assessment is required during the emergency response phase, operational guidelines provide measures to manage E&S risks and impacts. Rapid assessments conducted during the emergency response phase incorporate environmental and social (E&S) planning considerations, particularly in the preparation of emergency operations plans. Mitigation actions under the ESMS will embed SLS 1 requirements into existing BNPB emergency guidelines and reporting workflows, including through the use of monitoring checklists and activity logs.

National regulations and BNPB regulations governing workers, including volunteers, and occupational health and safety (OHS) in emergency response activities are considered adequate to support the objectives of **SLS 2**, as they establish minimum requirements for labor protection, non-discrimination, and OHS, as well as provide institutional arrangements for the management of workers and volunteers during emergency response operations. BNPB has established regulations regarding search, rescue, and evacuation which cover safety equipment that should be used by the emergency workers such as safety vest, safety boots, mask, head, and hand protections, etc. In addition to that, according to Regulation of the Head of BNPB No. 24 Year 2010 regarding the Preparation of Disaster Emergency Operation Plans, requires the inclusion of a safety plan that identifies safety hazards and outlines the control measures to be applied throughout the operational period. For health-related aspects, the Disaster Emergency Medical Plan Form requires the completion of standard procedures for providing emergency medical assistance during disasters. During emergency response activities, the engagement of volunteers is common practice. Regulation of the Head of BNPB No. 17 of 2011 on Guidelines for Disaster Management Volunteers establishes principles consistent with SLS 2, including gender equality, non-discrimination, and respect for local culture, thereby supporting the fair and inclusive treatment of volunteers involved in emergency response operations. No significant regulatory gaps are identified.

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ESMS will strengthen existing monitoring procedures for emergency response activities to incorporate SLS 2 implementation, including the monitoring of workers and volunteers, occupational health, and safety (OHS), and the prevention and management of SEA/SH.

National regulations provide an adequate operational framework for the implementation of **SLS 3** during emergency response phase. Regulatory instruments govern the management of disaster-related waste, including non-hazardous waste, hazardous and toxic waste (B3), healthcare waste, and electronic waste generated in disaster-affected areas. BNPB regulations and technical guidelines further establish requirements for environmental sanitation, clean water supply, waste and wastewater management, vector control, and public health protection during disaster emergencies. BNPB and Ministry of Environment and Forestry regulations allow for alternative hazardous waste management measures under emergency conditions where standard practices cannot be fully implemented. Additionally, BNPB has issued the *Guidelines for Cleaning Up the Environment in a Disaster Emergency* (2015), which provide guidance on the waste handling/dumping, temporary storage, and disposal of toxic and hazardous waste during disaster response operations. This is further reinforced by Regulation of the Minister of Environment and Forestry No. 56 of 2015 on the Procedures and Technical Requirements for the Management of Hazardous and Toxic Waste from Health Service Facilities, which stipulates that under emergency conditions, such as emergency response situations where toxic and hazardous waste management standards and practices cannot be fully implemented, alternative measures including encapsulation, inertization, or controlled burial may be applied, in accordance with the procedures set out in that regulation. Collectively, these frameworks are designed to prevent pollution, minimize public health risks, and protect environmental quality during emergency response. No significant gaps related to SLS 3. The emergency response monitoring checklists under this ESMS are introduced to strengthen existing monitoring procedures related to SLS 3 aspects in the implementation of emergency response activities.

National regulations and BNPB regulations, together with relevant implementing guidelines, are considered adequate to manage community health and safety risks and impacts under **SLS 4** during emergency response. These frameworks establish clear requirements for the design and implementation of temporary housing and WASH services, including health, safety, environmental, and structural standards, the use of qualified professionals, safe construction materials, accessibility for persons with disabilities, and measures to prevent discrimination and harassment. In addition, BNPB regulations governing logistics management require the application of safety measures in the transportation and distribution of relief goods. These regulatory and operational instruments provide a sufficient legal and institutional basis to prevent, minimize, and manage community health and safety risks during emergency response operations. No significant gaps are identified. During the emergency phase, SEA/SH risks are managed through existing procedures according to BNPB Regulation No. 13 of 2014 and Ministerial Regulation No. 8 of 2024, which include application of established protection standards,

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codes of conduct, referral pathways, and SEA/SH-sensitive grievance mechanisms. These procedures integrate SEA/SH risk assessment and prevention and response measures into the standard of basic services (shelter, WASH, health, education, psychosocial support, and security); apply a survivor-centered approach; establish complaint handling and referral systems for SEA/SH cases; and coordination lead by the Child Protection and GBV Sub-Clusters as part of the emergency command system. ESMS will strengthen existing monitoring procedures for emergency response activities by operationalizing SLS 4 requirements through integration into practical emergency response monitoring checklists used during implementation of emergency response operations.

In emergency response contexts, land-use activities financed under the PFB are mainly intended to support provision of temporary housing or shelter, with small land use for early warning installation. Operational arrangements for land use related to temporary shelters, as set out in BNPB Guidelines No. 3 of 2023 on Temporary Housing Assistance for Disaster Victims are broadly consistent with **SLS 5**. They incorporate land-use due diligence, risk and feasibility assessments, stakeholder engagement, equitable access to basic services, community participation, environmental considerations, and safety and security requirements. In addition, BNPB Regulation No. 3 of 2018 on the Handling of Refugees in Disaster Emergency Situations provides a framework for compensation and livelihood restoration throughout the displacement cycle, from initial sheltering through return or relocation. This includes wage payments for employed refugees, compensation and restoration of residency and political rights, assistance with document replacement, financial support for housing repairs, replacement of seeds and livestock, rental assistance for housing and business land, and monitoring of compensation and rights restoration processes. Building these provisions, the ESMS will strengthen existing emergency response phase procedures by introducing a screening template within land due diligence guidelines. This will help ensure that all emergency land use is underpinned by documented and voluntary agreements, with clear commitments to fair compensation and land restoration.

Indonesia's regulatory framework provides a strong and generally adequate basis for biodiversity conservation in line with **SLS 6**, including the protection of legally designated protected areas, natural habitats, ecosystem integrity, and protected species. At the same time, national regulations allow limited and temporary use of forest areas for life-saving emergency response activities such as evacuation routes and temporary shelters under Government Regulation No. 23 of 2021 on the implementation of forestry and its operationalization through the Regulation of the Minister of Environment and Forestry No. 7 of 2019 on Forest Area Borrow-and-Use Permits, with clear requirements for environmental safeguards and post-use rehabilitation. BNPB Guidance No. 3 of 2023 further requires that emergency facilities, including temporary housing *(Huntara)*, apply the principle of minimizing negative environmental impacts, including when located in or near conservation areas. Overall, existing BNPB guidelines and relevant national regulations on biodiversity are considered adequate to support the implementation of SLS 6, as they incorporate key principles consistent with SLS 6, including the

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avoidance and minimization of impacts on natural habitats and biodiversity during emergency response activities. These requirements apply to emergency interventions, such as the siting of temporary shelters (*Huntara*), including in or near conservation areas. Accordingly, no significant gaps related to biodiversity aspects. The emergency response monitoring checklists under this ESMS are introduced to strengthen existing monitoring procedures related to SLS 6 aspects in the implementation of emergency response activities.

Indonesia's disaster management regulatory framework, including BNPB regulations and guidelines, generally aligns with the principles of **SLS 7** by recognizing and valuing cultural and local wisdom, promoting participation, and prioritizing vulnerable groups, including Customary Communities, during emergency response. These principles are reflected in the planning and implementation of emergency activities such as temporary shelters and basic service provision, where community perspectives and local socio-cultural contexts are taken into account. Additionally, the displacement/shelter cluster includes a technical team on Indigenous Peoples' protection to ensure the meaningful engagement of Indigenous Peoples (IPs) in activities. Overall, no significant regulatory gaps are identified for SLS7 implementation during emergency conditions. However, where emergency activities such as the provision of basic services or temporary shelters are planned within or affect areas of Customary Communities, specific consultation and agreement mechanisms may be required to ensure culturally appropriate decision-making consistent with SLS 7. The ESMS addresses this by strengthening monitoring of emergency activities to include SLS 7 considerations and by integrating mitigation measures related to Customary Communities, as outlined in the Indigenous Peoples Planning Framework (IPPF), into capacity-building materials and simplified operational guidance.

National regulations provide an adequate operational basis for protecting and preserving cultural heritage across all phases of disaster management, including emergency response, in line with **SLS 8** requirements. The Guidelines for Disaster-Resilient Cultural Heritage (Ministry of Education, Culture, Research and Technology, 2023) set out procedures for risk and impact assessment, mitigation, protection, recovery, and stakeholder engagement to safeguard cultural heritage during disaster emergencies. No significant regulatory gaps have been identified for SLS 8 implementation in the emergency response phase. The ESMS complements existing government protocols through the application of the Chance Find Procedure, enabling cultural heritage considerations to be systematically integrated into rapid assessments, emergency operation plans, and emergency response monitoring checklists.

National disaster management regulations provide a strong basis for compliance with **SLS 10** during the emergency response phase by emphasizing structured coordination and communication with affected communities through the Command System and refugee management procedures. These regulations promote timely and accessible information disclosure on safety, evacuation, assistance, and service availability, encourage engagement with affected parties, and support participatory

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interaction, grievance handling, and feedback mechanisms at evacuation sites and service points. BNPB regulations require the establishment of accessible grievance mechanisms through complaint centers at Emergency Disaster Response Posts and grievance mechanism arrangements at national and subnational levels. In addition to that, there is a community engagement working group within the displacement/shelter cluster, which is also supported by NGOs. No significant gaps are identified between existing regulations and SLS 10 requirements for emergency response. The ESMS strengthens implementation through enhanced monitoring and capacity building, guided by the Stakeholder Engagement Framework (Chapter 8) and the GRM (Chapter 9), to ensure inclusive, well-documented, and effective stakeholder engagement during emergency activities.

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CHAPTER 4.
ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS ASSESSMENT AND MANAGEMENT FOR PRE-DISASTER AND POST-DISASTER ACTIVITIES

This chapter will explain how the assessment and management of Environmental and Social (E&S) risks and impacts are conducted for PFB-funded activities in the pre-disaster and post-disaster phases. The E&S assessment approach in this ESMS is designed to be adaptive and proportionate to the level of risk, taking into account potential impacts, particularly on vulnerable groups, and involving consultation with stakeholders. Implementation of E&S management is essential to ensure that activities achieve sustainable E&S outcomes, prevent community dissatisfaction, achieve cost efficiency through E&S risk prevention, and meet activity approval requirements. The assessment and management of environmental and social risks not only aim to mitigate negative impacts but also to ensure the protection of vulnerable groups, prevent social conflicts, maintain community security, and increase the effectiveness and sustainability of community-based interventions.

4.1. E&S MANAGEMENT BUSINESS PROCESS FOR PRE- AND POST-DISASTER ACTIVIES

E&S management for PFB-funded activities, both in pre- and post-disaster phases, is fully integrated into the PFB business process, which aligns with the activity financing cycle. The E&S business process comprises three primary stages: proponent self-assessment; assessment, verification, and disbursement; and monitoring and evaluation, as illustrated in Figure 4.1.

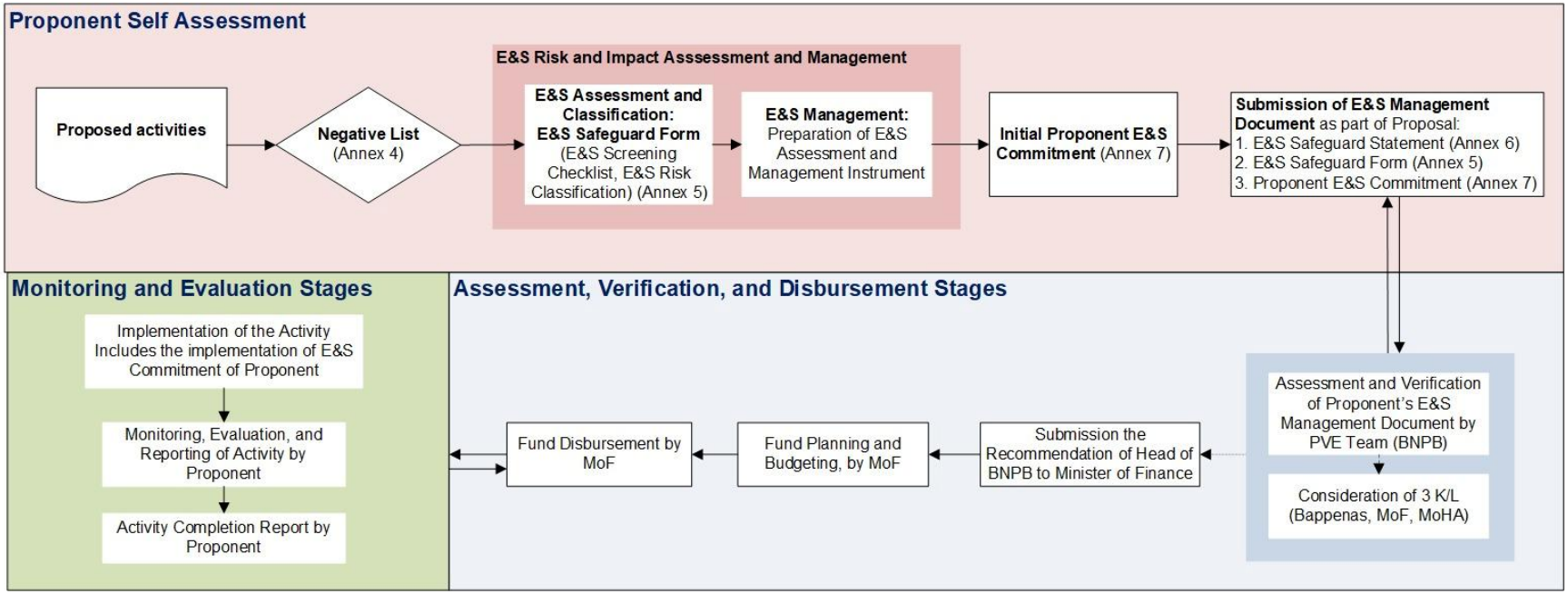

Figure 4.1. The Environmental and Social Management Business Process in the PFB of Pre-disaster and Post-disaster Phase

4.1.1. Proponent Self-Assessment

In both pre- and post-disaster phases, the E&S risk management starts with a proponent self-assessment. Proponents should assess risk levels of their proposed activity, consider alternative designs or locations, and commit to mitigation measures. The proponent self-assessment process involves: (i) assessing proposed activities; (ii) screening against a negative list; (iii) conducting E&S risk and impact assessment and management; and (iv) formulating proponent E&S commitments.

During the pre-disaster phase, BNPB issues a formal call for proposals that specifies submission timelines, eligibility criteria, technical and administrative requirements, and priority intervention areas, consistent with BNPB's annual planning. Proposals may be submitted only during the designated call period and must align with the objectives and priorities outlined in the call for proposals.

In the post-disaster phase, BNPB does not issue a call for proposals, and proposal submissions are not subject to a fixed submission period. Instead, proposals may be submitted on a rolling basis, provided that the Post-Disaster Rehabilitation and Reconstruction Plan (*Rencana Rehabilitasi dan Rekonstruksi Pascabencana*/ R3P) document[23] from the Regional Disaster Management Agency (BPBD) remains valid. All proposals must demonstrate consistency with the R3P, and proponents are required to undertake a context-specific assessment that reflects post-disaster conditions, with particular attention to E&S risk and impact associated with reconstruction and rehabilitation activities.

1. Proposed Activities

Proponents are required to assess their proposed activities. For the pre-disaster activities, the proposed activities need to follow requirements in the issued call for proposals, list of pre-disaster activities under PFB are described in Annex 2a and should align with the following priorities:

a) Activities aligned with the National Disaster Management Plan/Regional Disaster Management Plan or the Government Work Plan/ Regional Government Work Plan.
b) Activities in areas with a high disaster risk index; and
c) Activities aligned with minimum service standards in the disaster management.

[23] In accordance with BNPBR Regulation No. 5 of 2017 on Preparation of Post-Disaster Rehabilitation and Reconstruction Plan (R3P) that R3P Document is a planning document for the implementation of rehabilitation and reconstruction with a three-year validity period. This document is developed based on the results of the Post-Disaster Needs Assessment (*Kajian Kebutuhan Pascabencana/ Jitupasna*) and encompasses recovery strategies for the housing, infrastructure, economy, social, and cross-sectoral.

For post-disaster activities, proponent shall assess and ensure their proposed activities are included in potential list of post-disaster activities in Annex. 2c and meet rehabilitation and reconstruction requirements outlined in the Post-Disaster Rehabilitation and Reconstruction Plan (R3P) document, that encompassing five sectors: housing, infrastructure, social, economic, and cross-sectoral.

2. Negative List Screening

The proponent must ensure that the proposed activities do not fall under the negative list, as PFB funding cannot be allocated to any activities or provisions specified on the PFB negative list (Annex 4). This list is applied as an early-stage screening tool to filter out activities with unacceptable E&S risks, in accordance with national regulatory requirements and the *Standar Lingkungan dan Sosial* (SLS). The biodiversity-related negative list (Annex 4, item 8) often cannot be conclusively determined at the screening stage due to limitations in the information available to the activity proponent. To address this constraint, the screening of biodiversity-related negative list criteria may refer to the Biodiversity Management Framework (Annex 12).

After ensuring that the proposed activity does not trigger any of the items on the negative list, the proponent proceeds with a more detailed Environmental and Social (E&S) self-assessment.

3. E&S Risk and Impact Assessment and Management

At this stage, proponents must assess the E&S risks and impacts of their proposed activities and identify necessary mitigation measures. They are also required to complete the E&S Screening Checklist and Risk Classification that will be part of the required information in the E&S Safeguards Form. Based on the screening results, proponents should define further E&S assessment or management instruments that align with the SLS and ensure that the proposed activities meet the PFB funding eligibility criteria.

a) E&S Screening and Classification

This stage includes screening of potential E&S risks and impacts using E&S Screening Checklist (Annex 5b) to identify potential SLS triggered by the proposed activity and E&S risk classification (Annex 5a) to determine the activity's E&S risk level based on applicable categories (low, moderate, substantial, and high). The E&S Screening Checklist provides an initial indication of the environmental and social aspects that may require management, along with relevant guidance documents that can be consulted to assess whether specific E&S instruments are required. In parallel, the E&S risk classification determines the type and level of environmental and social instruments to be prepared, such as a supplementary ESIA,

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ESMP, or other applicable instruments based on the nature and significance of the identified risks and impacts. The results of E&S screening and risk classification are included in the E&S Safeguards Form (Annex 5) that will be part of the activity proposal.

b) Preparation of E&S Assessment and Management Instruments

The E&S screening in the E&S Safeguards Form will serve as the basis for deciding whether additional E&S assessments are required. The example of additional assessment is supplementary E&S Impact Assessment (ESIA) and other thematic studies depending on potential impacts assessed.

Following the E&S Assessment, the proponent shall determine what E&S management instruments are required to manage E&S risk and potential impacts. E&S risk management will apply the mitigation hierarchy[24], prioritizing avoidance of adverse impacts, then minimization, mitigation, and, where necessary, compensation or offsetting of residual impacts. The aim is to achieve optimal activity outcomes while reducing E&S risks, ensuring activities are conducted with maximum benefit and minimal drawbacks.

The E&S assessment and mitigation hierarchy consideration process will inform the need for additional E&S management instruments. These may include, but are not limited to, an ESMP, Stakeholder Engagement Plan, Biodiversity Management Plan, or other thematic instruments tailored to the specific risk level and relevant SLS.

4. Initial Proponent Environmental and Social Commitment

Measures to manage the E&S risks and impacts of the activity will be detailed in the Proponent's E&S Commitment (Annex 7. Proponent Environmental and Social Commitment). This document defines specific actions required for compliance with the SLS within established timeframes. The proponents are responsible for preparing and implementing the E&S Commitment to ensure its effectiveness, guided by the E&S assessment findings and stakeholder engagement outcomes. As a legally binding document, the E&S Commitment forms the foundation for monitoring E&S performance throughout the activity's life cycle. The content of the E&S Commitment will include practical tools for managing E&S risks and impacts, such as management plans, capacity-building initiatives, stakeholder engagement strategies, and ongoing monitoring and supervision. These measures will be implemented across all phases of the activity to ensure continuous alignment with SLS requirements.

[24] The Mitigation Hierarchy that determines the risk management strategy and monitoring of potential impacts, namely (i) Anticipation and Avoidance; (ii) Minimization; (iii) Mitigation; and (iv) Balancing or Compensation (restoration/ creation/ enhancement/ preservation)

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5. Submission of E&S Management Documents

Submission of the E&S Management documents is an integral part of submitting an activity proposal. Proponents are required to submit a package of E&S Management documents consisting of:

(i) an E&S Safeguards Statement (Annex 6)
The proponent's commitment statement to comply with all E&S Safeguards requirements.

(ii) an E&S Safeguards Form
The E&S Safeguards Form is a form (Annex 5) that contains a self-assessment of the activities undertaken by the proponent to assess the E&S risks and impacts that may arise from the proposed activity. This proponent's self-assessment includes a screening checklist (Annex 5b) and E&S risk classification (Annex 5a). A screening checklist to initially identify whether activities have environmental and/or social risks and impacts. It includes E&S Risk Classification as an instrument for determining the level of risk (e.g., low, moderate, substantial, and high).

(iii) an Initial Proponent E&S Commitment
The document sets out the proponent's commitment to manage E&S risks and impacts and defines the mitigation measures that will be implemented during activity life cycle.

These three documents reflect the proponent's commitment to ensuring that the proposed activities comply with E&S management principles, standards, and requirements. Required E&S management instruments, as defined in point 3.b., are expected to be ready and submitted as part of the package of E&S management documents.

4.1.2. Assessment and Verification Stage

The proposal assessment and verification stage define the steps for evaluating and selecting submitted proposals. By the end of this stage, proposals that fulfill the administrative and technical criteria are expected to be recommended by the Head of BNPB to the Minister of Finance for funding disbursement. This assessment phase will include review, verification, and recommendation processes, to ensure that activities with potential environmental and/or social impacts align with the SLS and/or national policies.

1. Assessment and Verification by BNPB

The review and verification process are carried out by the Pre-Disaster and Post-Disaster Review, Verification, and Evaluation (PVE) teams. Activities are grouped into review and verification.

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a) Review

The first stage of assessment involves a review process after BNPB receives proposals from proponents. The PVE Team will review the completeness of the documents submitted by the proponent and assess their consistency with the activity's E&S risk category and the corresponding E&S instruments. This assessment will verify that all proposal requirements are fulfilled and comply with applicable E&S regulations and standards. In addition, the PVE Team will evaluate the completeness of the E&S documentation and review eligibility criteria as required in BNPB Implementation Guidelines No. 4 of 2025 concerning PVE of PFB Management in the Pre-Disaster Phase and Implementation Guidelines No. 1 of 2025 concerning PVE of PFB Management in the Post-Disaster Phase to ensure alignment with the specified requirements. The E&S screening process enables the PVE Team to identify capacity of the proponents in managing E&S risks for activities of similar scale and type. This could be identified through proponents' experience in managing activities in accordance with national and/or international E&S standards, stakeholder engagement, and availability of a functioning feedback and grievance redress mechanism (FGRM).

More specific, the review process covers the following activities:

i) Examination of submitted proposal based on disbursement criteria, administrative criteria, and E&S management documents;
ii) Preparation of a list of proposals that meet the administrative requirements; and
iii) Preparation of an approval sheet for the results of the review.

The review process provides an opportunity for consultation and refinement of the proposal. For pre-disaster proposals, the PVE team may request the proponent to revise and/or complete the required E&S management documents within three (3) working days from the date of notification. Proponents are encouraged to maintain close coordination with the PVE Team during this period to ensure that all technical E&S requirements are addressed. Upon resubmission of the revised documents, the PVE Pre-Disaster Team will conduct a final review to confirm that all identified E&S gaps have been addressed before the proposal proceeds to the verification stage.

A longer revision period is provided for post-disaster activities, recognizing the operational complexities inherent in early post-disaster recovery. For post-disaster proposals, proponents have twenty (20) working days from the date of notification to

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complete the E&S management documents. This extended period allows proponents to gather more accurate field data and conduct meaningful consultations with affected communities, which are often challenging to execute immediately after a disaster. If the proponent fails to submit the necessary revisions within this timeframe, the proposal will be declared non-compliant, and the proposal submission process must be reinitiated from the beginning. Upon resubmission, the E&S documents will undergo a final review to ensure that all identified risks have been addressed with feasible mitigation strategies.

b) Verification

The proposal verification process can involve both desktop studies and field verification, if necessary. The PVE team verifies the proponent's technical requirements in order to assess the capacity of the proponent, proposal's substance, the quality of its technical approach, and other crucial elements for the activity's objectives.

This verification process includes activity to verify initial draft of the proponent E&S commitment to ensure:

- Compliance with the PFB E&S requirement;
- Compliance with the negative activity list; and
- Compliance with SLS and the E&S mitigation measures, including the required monitoring plan.

The PVE team will verify and provide input to the proponent's initial E&S Commitment. The agreed results are documented in a review and verification report. Field verification[25] based on BNPB Implementation Guidelines No. 7 of 2025 on the Review, Verification, and Evaluation Team Structure for Disbursement of the PFB is mandatory for sub-activities classified as moderate, substantial, or high E&S risk and serves as a key component of E&S assessment. The verification process comprises:

a. Preparation: PVE Team assignment, notification to the proponent, and coordination with relevant ministries/agencies;
b. Implementation: Site assessment to verify information stated in the proposal against actual conditions and assess E&S aspects as a baseline, followed by signing of a verification report with the proponent;

[25] Details of the field verification process can be found in the BNPB Implementation Guidelines No. 7 of 2025 on the Review, Verification, and Evaluation Team Structure for Disbursement of the PFB.

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c. Reporting: Submission of verification findings via official memo to the authorized official.

If the E&S Management documents meet the requirements, the PVE team prepares recommendations for the E&S Commitment and document the results in the review and verification report. If the documents do not meet the requirements, the PVE team will request revisions or additional information, which the proponent must submit within five (5) working days.

The verification of the E&S Commitment serves as the final quality control step, ensuring every funded activity is supported with a robust and actionable measures. Once all requirements are met and documented in the review and verification report, the PVE team issues a formal report, transitioning the proposal from the review and verification stage to the consideration and recommendation process. The verified commitment is incorporated into the final activity agreement as a legally binding obligation, ensuring that all identified E&S safeguards are monitored and enforced for the entire duration of the activity.

2. Consideration

Upon the completion of the review, the PVE report is submitted to three key ministries for further consideration. This consideration is provided by the Ministry of Finance, the Ministry of Home Affairs, and the Ministry of National Development Planning, in accordance with their respective mandates and authorities.

Consideration is carried out in accordance with the legal instruments governing the PFB disbursement. To formally initiate this stage, BNPB will issue an official letter to the three key ministries confirming the completion of the verification process. Receipt of this letter marks the commencement of the ten (10) day period for the consideration process. If no feedback is submitted within this prescribed timeframe, the respective ministries/agencies will be deemed to have provided their consideration. Finally, the three key ministries will submit their official consideration in the form of a written letter.

After the consideration stage concludes, the process advances to the final recommendation by BNPB that will determine the proponent's eligibility for funding.

3. BNPB Recommendation

Following completion of the consideration process, BNPB will consolidate all reviews to formulate the final recommendation. Based on the consolidated technical reviews, E&S assessments, and inter-ministerial feedback, BNPB will issue a recommendation letter. This recommendation will grant the proponent access to PFB funding, enabling the activity to proceed with the signing of the disbursement approval and subsequent implementation phase.

Recommendations are provided based on final assessment of: (i) a report on the results of the review and verification; (ii) a report on the results of the consideration from relevant ministries/agencies; and (iii) the proposal, including administrative requirements and E&S management documents. Recommendations will be signed by the Head of BNPB and submitted to the Ministry of Finance, with copies sent to the ministries/ institutions providing consideration, the Coordinating Ministry for Human Development and Culture, executing agencies[26], and the proponents.

4. Fund Planning, Budgeting, and Disbursement by MoF

After the Head of BNPB submits a recommendation to the Minister of Finance, the funding process officially transitions to the Ministry of Finance as the fiscal authority. The first phase, Fund Planning and Budgeting, involves reviewing the recommendations to ensure alignment with the available PFB resources. During this stage, allocation validation and budget document preparation confirm that the proposed activities meet all national budgeting technical criteria and align with the planned implementation schedule.

Once the budget planning is finalized, the process advances to Fund Disbursement stage. The Ministry of Finance transfers funds from the PFB account to the proponent's designated account, following established funding mechanisms and agreements. Fund disbursement occurs only after all administrative requirements are met and is recorded as PFB funding realization, enabling monitoring for accountability throughout the activity's implementation.

[26] BNPB Regulation No. 1 of 2025 concerning the Guidelines for the Distribution of PFB in the Post-Disaster Phase and BNPB Regulation No. 4 of 2025 concerning the Guidelines for the Distribution of PFB in the Pre-Disaster Phase state that the Executing Agency (EA) is the ministry/agency designated as responsible for implementing the PFB, particularly in the grant mechanism to local governments, which uses BNPB recommendations as the basis for submitting the Budget Implementation List (*Daftar Isian Pelaksanaan Anggaran*/ DIPA) and/or budget revisions.

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4.1.3. Monitoring and Evaluation Stage

Following the fund disbursement process, the proponent proceeds with activity implementation, to be tracked as part of the Monitoring and Evaluation (M&E) process. Details of monitoring and evaluation stage is provided below:

1. Monitoring and Reporting by Proponent

Following the fund disbursement process, the proponent commences the implementation of the proposed activity. Throughout the activity cycle, the proponent shall ensure the implementation of its E&S commitment. This includes ensuring that identified environmental and social risks and impacts are properly managed, mitigation measures are applied as planned, relevant stakeholders are engaged, and compliance with applicable E&S requirements is continuously monitored and documented. During the implementation of activity, proponent is required to prepare monitoring report as part of activity implementation report with the following conditions, as specified in the implementation guidelines:

- For activity with implementation period less than 6 (six) months, proponent to submit two reports, i.e., initial report and final report to BNPB.
- For activity with implementation period of 6 (six) months or more, proponent to submit the monitoring reports quarterly (every three months) since the funds were distributed throughout the activity implementation.

These reports document implementation progress of ESMP and/or other management plans, grievances received and resolved, stakeholder engagement activities, and incidents.

At the end of the implementation of activity, proponent is required to prepare Activity Completion Report (ACR). The report shall be submitted within 60 (sixty) calendar days following completion of the activity. The ACR integrates all results of ongoing monitoring and any E&S audits to provide comprehensive information on the implementation of E&S commitment. BNPB's acceptance of the ACR signifies formal closure of E&S obligations for the activity. The report must include:

a) executive summary and status of E&S compliance against E&S commitment;
b) implementation and completion status of all measures in Government's E&S instruments, ESMP and thematic plans;
c) stakeholder engagement activities;
d) contractor performance evaluation (if any contractor engaged by the proponent);

e) corrective actions closure with evidence that all non-compliances have been addressed (if any E&S audit triggered);
f) grievance resolution summary;
g) records of incidents and accidents; and
h) lessons learned and recommendations for future activities.

2. Monitoring and Evaluation by BNPB

Implementation of activity by proponent will be monitored and evaluated by PVE Team in BNPB. E&S monitoring may be undertaken throughout the activity implementation with the following mechanism:

a) Reviewing activity implementation report submitted by proponent to monitor the implementation progress of Proponent E&S Commitment, including compliance to any relevant SLS that may apply;
b) Random sampling to some activities; and/or
c) If necessary, site visits will be conducted to understand any irregularities indicated in the report, for moderate to high-risk activities, as outlined in the BNPB implementation guidelines No. 4 of 2025 concerning PVE of PFB Management in the Pre-Disaster Phase and Implementation Guidelines No. 1 of 2025 concerning PVE of PFB Management in the Post-Disaster Phase. These visits aim to gather financial or program information to strengthen the understanding of compliance and performance. Additionally, visits may be conducted with or without prior notice.

In addition to assessing compliance, E&S monitoring will also review the proponent's capacity to effectively implement the E&S commitments. When gaps or capacity constraints are identified, the monitoring process may lead to recommendations for enhanced oversight measures, including additional or more frequent periodic reporting.

Based on the monitoring activity conducted by BNPB, and any grievances received through the proponent's system or external channels, evaluation is conducted by BNPB in collaboration with the activity proponent and may involve technical ministries/agencies or experts/professionals (if necessary). Evaluation is conducted under these conditions:

a) for activities with an implementation period of 12 (twelve) months or less, the evaluation is carried out at the end of the budgeting period.
b) for activities extending beyond 12 (twelve) months or multiple years, the evaluation is carried out at the mid-term and at the end of the budgeting period.

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The findings and results of these evaluations will serve as a basis for determining the effectiveness of the current safeguards; should any deficiencies or deviations from the agreed E&S commitment be identified, the proponent is required to prepare and implement a comprehensive corrective action plan, such as an Environmental and Social Corrective Action Plan (ESCAP), to rectify the issues and ensure full alignment with the SLS requirements.

3. Audit

In addition to regular monitoring and evaluation, BNPB may request the proponent to conduct a specific E&S Audit by involving relevant technical expert(s) from relevant ministries, agencies, or other professional sources. This measure is triggered under specific conditions, such as:

a) Repeated non-compliance identified in the implementation of the disbursement approval and the Proponent E&S Commitment.
b) The occurrence of repeated incidents and/or accidents at the activity sites.
c) The emergence of significant E&S impacts from the activity implementation that have not previously identified in the proposal; and/or
d) The existence of unresolved and/or overdue grievances received by the PVE team regarding the activity implementation, particularly E&S risk management implementation.

The proponent is expected to initiate and complete the E&S audit as quickly as possible to ensure an accurate recount of events and to facilitate the expedient learning of lessons. The E&S audit may be undertaken by a suitably qualified member of the contractor or the supervision team, and/or by an independent investigator (e.g., an international or national consultant versed in the subject matter) which has been specifically commissioned by the proponent. While the proponent bears the primary responsibility for the audit, BNPB may provide support by identifying suitable experts to ensure the process meets the required standards. The detailed Terms of Reference (ToR) for the E&S Audit are available in Annex 18.

The findings generated from the E&S Audit serve as a critical evidence-based foundation for the development of a Corrective Action Plan (CAP). This plan must outline specific, time-bound measures to rectify all identified deficiencies, allocate necessary resources, and assign clear responsibilities for implementation. BNPB, through the PVE team, will closely monitor the execution of the CAP to ensure that all non-compliances are resolved and that the risk of recurrence is minimized.

Audit findings are used as formal inputs to the activity review process and are addressed through required corrective actions by the proponent. Resolution of material audit findings is a prerequisite

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for the issuance of the Activity Completion Report in section 4.1.3 (5), which marks the formal closure of the Monitoring and Evaluation stage.

4.2. E&S REQUIREMENT FOR PRE - AND POST - DISASTER ACTIVITIES

As part of the business process in sub chapter 4.1, proponent and BNPB are responsible for ensuring that all PFB funded activities in pre- and post- disaster phases are reviewed and evaluated with the relevant E&S assessment and management requirements.

The E&S risk classification determined through screening in section 4.1.1 directly determines the types of assessment and mitigation management instrument required. The PFB ESMS recognizes and builds upon Indonesia's existing environmental management framework. The relationship between risk classification, government environmental documents, and PFB E&S instruments is outlined below:

a) Low risk activities: Government environmental document requirements (SPPL).
b) Moderate risk activities: Government environmental document requirements (SPPL/UKL-UPL).
c) Substantial risk activities: Government environmental document requirements (UKL-UPL or AMDAL/ EIA), supplementary ESIA and ESMP are required to address gap between UKL-UPL/AMDAL and SLS requirements and prepare specialized thematic study and plans as needed.
d) High risk activities: Government environmental document requirements (AMDAL/ EIA), supplementary ESIA and ESMP are required to address gap between AMDAL and SLS requirements and prepare specialized thematic study and plans as needed.

Thematic plans may include:

- Traffic Management Plan/ TMP for activity with heavy vehicle movements.
- Hazardous Materials and Waste Management Plan including medical waste.
- Biodiversity Management Plan for activities affecting natural habitats.
- Community Health and Safety Plan (CHSP) for activities affecting significant public interfaces.
- SEA/SH Action Plan.
- Indigenous Peoples Plan if indigenous communities are affected.

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Table 4.1 List of Environmental and Social Safeguard Instruments

No	Environmental and Social Requirements	Description
Required instruments per national regulations**:** Proponents shall ensure full compliance with Government Regulation (PP) No. 22 of 2021 concerning the Implementation of Environmental Protection and Management. This regulation requires all activities to secure an integrated Environmental Approval (*Persetujuan Lingkungan* through applicable instruments, as a prerequisite for lawful activity implementation in accordance with national environmental regulations. The safeguards must comprehensively address the protection and management of water, air, and marine quality, as well as the systematic handling of toxic and hazardous (B3) and non-toxic and hazardous waste. Furthermore, proponents are responsible for implementing measures to prevent environmental damage and ensuring that all data is integrated into the national environmental information system. Compliance is subject to strict government oversight, where administrative sanctions and corrective actions are enforced to ensure the restoration of environmental functions throughout the activity's lifecycle		
1.	AMDAL/ *Analisis Mengenai Dampak Lingkungan* (Environmental Impact Assessment)	AMDAL is a mandatory environmental instrument in Indonesia for activities with the potential to have significant environmental impacts, in accordance with Government Regulation No. 22 of 2021 concerning the Implementation of Environmental Safeguard and Management. AMDAL consists of ANDAL, RKL, and RPL and includes stakeholder consultation and approval by the competent authorities.
2.	UKL-UPL/ *Upaya Pengelolaan Lingkungan dan Upaya Pemantauan Lingkungan* (Environmental Management Efforts and Environmental Monitoring Efforts)	UKL–UPL applies to activities with moderate environmental impacts and constitutes a prerequisite for environmental approval under national regulations. For PFB-funded activities, UKL–UPL documents must be reviewed against applicable SLS requirements, and where gaps are identified, supplementary E&S instruments may be required to ensure consistency with the ESMS. The UKL-UPL remains a national compliance instrument.
3.	SPPL/ *Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup* (Statement of Environmental Management and Monitoring Commitment)	SPPL is required for low-risk activities that do not trigger AMDAL or UKL–UPL. It represents a formal commitment by the proponent to manage and monitor environmental impacts. For PFB activities, SPPL remains a national compliance instrument.
Assessment: The E&S assessment is a systematic analysis process undertaken to identify, analyze, and characterize potential E&S risks and impacts associated with activities funded by the PFB. The scope, depth, and level of detail of the E&S assessment refer to the principles of the risk-based approach and are aligned with the provisions of SLS 1 and adapted to the nature and scale of the activity, the disaster management phase, the scale of the intervention, the implementing entity’s capacity, and the level of identified E&S risk. The E&S assessment may consist of screening, risk classification, and where required more detailed E&S studies, undertaken from the early stages of activity preparation. The outcomes of the assessment served as the basis for financing decisions, activity design, and the		

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No	Environmental and Social Requirements	Description
determination of appropriate E&S management instruments and obligations, which are to be fulfilled by the proponent during activity implementation.		
1.	Negative list	The negative list serves as the initial screening tool to determine the eligibility of a proposed activity. Activities included in this list are ineligible for PFB financing due to unacceptable E&S risks or inconsistency with sustainability objectives. (Refer Annex 4).
2.	E&S Risk Classification	This instrument categorizes activities into risk levels (e.g., Low, Moderate, Substantial, or High) based on the nature, scale, location of activities, and proponent capacity. The risk classification determines the scope of assessment required and the level of oversight throughout implementation. (Refer Annex 5a).
3.	E&S Screening Checklist	The E&S Screening Checklist is used by the proponent to identify potential E&S risks and determine applicable SLS triggers. The results are documented in the E&S Safeguards Form and serve as the basis for risk classification and the determination of required assessment and management instruments. (Refer Annex 5b).
4.	Supplementary Environmental and Social Impact Assessment (ESIA)	Supplementary ESIA is required when activities are classified as substantial or high risk where national government instruments (AMDAL or UKL–UPL) do not fully address applicable SLS requirements. Supplementary ESIA may include thematic specific studies, as relevant (e.g. Hazard and Risk Assessment, Social and livelihood assessment, Indigenous Peoples studies/ impact assessment, Biodiversity studies, SEA/SH risk assessment). Supplementary ESIA is available in Annex 8.
Management Instruments: refer to the set of E&S tools, plans, and procedures applied under the PFB ESMS to operationalize the outcomes of E&S risk screening and assessment. These instruments are designing to prevent, avoid, minimize, mitigate, and manage identified E&S risks and impacts associated with PFB-funded activities, in a manner proportionate to the level of risk, the nature of the activity, and the capacity of the proponent. Management Instruments include, but are not limited to, ESCOPs, ESMP, Risk and Hazard Assessment, Biodiversity Management Framework, IPPF, SEA/SH Risk Management, Land Due Diligence, CFP, and SEP. Where relevant, these instruments also address risks associated with associated facilities. These management instruments provide a structured and risk-based approach to ensuring that E&S risk and impact management measures are clearly defined, implemented, monitored, and reported consistently across all stages of activity implementation.		
1.	Environmental and Social Management Plan (ESMP)	ESMP details mitigation measures, monitoring arrangements, institutional responsibilities implementation schedules, and indicative costs to manage identified E&S risks. ESMP may complement RKL-RPL matrices and is informed by Supplementary ESIA where applicable. (Refer Annex 9).

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No	Environmental and Social Requirements	Description
		To operationalize E&S commitments, the PFB framework utilized specific safeguard instruments tailored to identified risks. The instruments may integrate detailed management plans, including but not limited to those outlined below: - Sexual Exploitation and Abuse/ Sexual Harassment (SEA/SH): A plan to prevent SEA/SH through codes of conduct and survivor-centered grievance mechanisms. - Hazardous and Toxic Materials/Waste Management Plan: A plan to minimize and manage the generation of waste and minimize the impact on human health or the environment that may affected by waste generated. - Traffic Management Plan: A plan to identify, assess, and manage traffic-related impacts associated with activities. - Emergency Response Plan: A plan prepared based on identification of hazards or risk factors conducted as part of RHA. - Biodiversity Management Plan: Measures to conserve biodiversity, including the identification and assessment of natural and critical habitats, protection of species, and application of the mitigation hierarchy to avoid, minimize, and compensate impacts. The plan sets out mitigation and monitoring measures designed to ensure compliance with SLS 6 throughout the activity lifecycle. - Indigenous Peoples (IP) Plan: A plan to protect the rights and culture of Indigenous communities through Free, Prior, and Informed Consent (FPIC). Stakeholder Engagement Plan (SEP): A strategy for meaningful consultation and transparent information disclosure using a functional Grievance Redress Mechanism (GRM).
2.	Environmental and Social Code of Practices/ ESCOPs	ESCOPs are standardized operational guidelines that provide practical, field-level measures to manage common E&S risks associated with PFB-funded activities. ESCOPs support the implementation of national instruments and ESMS requirements but do not replace AMDAL, UKL-UPL, SPPL, ESIA, or ESMP. ESCOPs function as a cross-cutting implementation tool applicable across cluster phase. (Refer Annex 10).
3.	Risk and Hazard Assessment and Emergency Response Plan	Required where screening or gap analysis identifies potential OHS or CHS risks under SLS 2 and SLS 4. This plan may be integrated into ESMP or prepared as a standalone instrument. (Refer Annex 11).

No	Environmental and Social Requirements	Description
4.	Biodiversity Management Framework	Required when screening identifies potential impacts on biodiversity or living natural resources, or where national instruments do not fully meet SLS 6 requirements. (Refer Annex 12).
5.	SEA/ SH Risk Management	Prepared when SEA/SH risks are identified during assessment, outlining prevention, mitigation, reporting, and response measures. It may be integrated into ESMP or prepared separately. and may be part of or separate from the ESMP. (Refer Annex 13).
6.	Stakeholder Engagement Plan (SEP)	The SEP provides a structured strategy for meaningful identification, consultation, information disclosure, and grievance handling throughout the activity lifecycle, consistent with SLS 10. It is integrated into the E&S Safeguards Form. (Refer Annex 14).
7.	Land Due Diligence Guideline	Used to assess risks related to land use, land acquisition, or access restrictions, ensuring compliance with SLS 5 and national regulations. Includes verification of land status, avoidance of involuntary resettlement, and mitigation measures where applicable. (Refer Annex 15).
8.	Indigenous Peoples Planning Framework (IPPF)	IPPF guides screening, consultations and impact management for activities affecting Indigenous Peoples or customary communities, including FPIC requirements where applicable. (Refer Annex 16).
9.	Chance Finds Procedure (CFP)	Required for activities with potential impacts on physical cultural heritage, to ensure appropriate response in case of chance discoveries, consistent with SLS 8. (Refer Annex 17).

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CHAPTER 5.
ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS ASSESSMENT AND MANAGEMENT FOR EMERGENCY RESPONSE ACTIVITIES

This chapter outlines the approach, principles, and procedures for assessing and managing Environmental and Social (E&S) risks and impacts associated with PFB-funded activities during the emergency response phase. In accordance with BNPB's emergency response business processes, E&S risk management systematically integrated into emergency response policy and procedures. As such, E&S considerations are embedded within BNPB's existing emergency response framework and decision-making processes and are not implemented as a separate system.

Recognizing the urgency of life-saving interventions, the ESMS is implemented in an adaptive, simplified, and risk-proportionate manner while upholding the core principles of the Environmental and Social Standards (SLS). The focus remains on maintaining essential safeguards for community safety, vulnerable groups, emergency workers, and the environment, even under time and data constraints. This approach emphasizes practical, contextual mitigation, and responsive risk management.

As the ESMS is embedded throughout the emergency response cycle, all E&S measures, including incident management and grievances, are documented in proportion to their significance. This documentation fosters accountability and supports post-emergency review, serving as a basis for institutional learning and ensuring findings are addressed as the disaster phase transitions into recovery and reconstruction.

5.1. E&S MANAGEMENT BUSINESS PROCESS FOR EMERGENCY RESPONSE

This section describes PFB's business process for emergency response activities, which is structured into two primary stages as shown in Figure 5.1: (1) Commencing Disaster Emergency and (2) During the Emergency Status. In line with BNPB's disaster management protocols, emergency response activities are generally financed through APBN (State Budget) using disaster reserve funds, which is sourced from the On-Call Budget (*Dana Siap Pakai*/ DSP). During the Commencing Disaster Emergency stage, these established mechanisms are applied to

address immediate disaster emergency situations, conduct rapid needs assessment (RNA), and convene coordination meetings to determine the scale of the crisis and emergency status.

Once the Emergency Status is officially determined and declared, the PFB can be accessed as a funding source under specific conditions to top up the On-Call Budget (*Dana Siap Pakai*/ DSP). As stipulated in Chapter 1, PFB funds are utilized through two primary mechanisms:

a. Non-principal funds (generated from PFB principal) can be added to the disaster reserve fund if the original reserve has been depleted.
b. Principal funds can be accessed only if a National Emergency Status is declared by the President and both the original reserve and non-principal PFB funds are completely depleted.

To initiate disbursement from the PFB, the Directorate General of Budget (DJA) must submit a request for additional emergency response reserves to the Minister of Finance. Upon approval, BPDLH deposits funds equivalent to the additional reserve into the State General Cash Account (RKUN) to finance the emergency response in accordance with statutory provisions.

Within the established business process for emergency response activities, E&S management is not treated as separate procedure, but is embedded throughout all stages of decision-making, from the initial assessment and the development of the Emergency Operation Plan to activity implementation.

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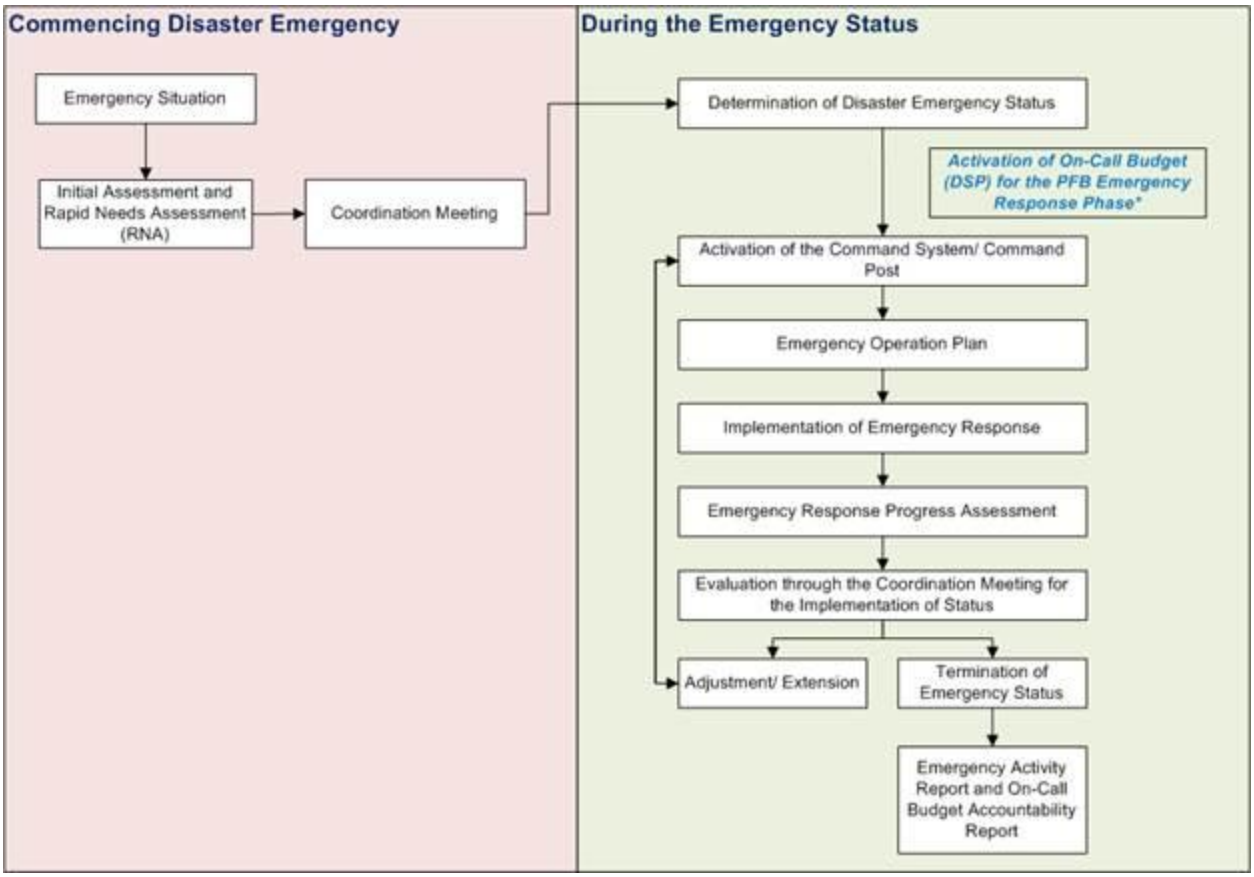

Figure 5.1. Emergency Response Phase Process Flow

5.1.1. Commencing Disaster Emergency

This stage consists of Emergency situation, Initial Assessment and Rapid Needs Assessment (RNA), and Coordination Meeting. Commencing Disaster Emergency reflects the sequence of initial emergency processes as regulated under Indonesia's disaster emergency management framework. In alignment with the national disaster emergency procedures, the process begins with a systematic evaluation of the crisis or emergency. This stage incorporates the following essential components: (1) Emergency situation; (2) Initial Assessment and Rapid Needs Assessment (RNA); and (3) Coordination Meeting.

1. Emergency Situation

The Emergency Situation stage begins when a disaster event that poses a significant threat to life, property, or the environment, requiring immediate action. In this stage, disaster management authorities promptly implement initial responses in accordance with their responsibilities, including disseminating early incident information and securing emergency conditions.

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2. Initial Assessment and Rapid Needs Assessment (RNA)

Based on BNPB Implementation Instructions No. 4 of 2023 concerning Initial Assessments, an initial assessment is an activity aimed at gathering preliminary information from threatened or affected areas to support local governments in assessing disaster situations and needs, carried out by the Rapid Response Team (*Tim Reaksi Cepat*/ TRC)[27].

Initial assessments are conducted in two stages: (a) assessment of potential disaster threats, undertaken at the earliest indication of a possible emergency, and (b) assessment of disaster emergency conditions, undertaken immediately upon the occurrence of a disaster. The potential threat assessment compiles early warning information, community-led preparedness actions, and access to threatened areas and facilities that may support self-evacuation. The disaster emergency assessment documents, the chronology of the disaster event, affected areas, preliminary estimates of affected populations and physical damage to basic and public facilities, initial response actions, urgent needs, access and evacuation constraints, and prevailing weather conditions.

Information for initial assessment is collected from field personnel, local governments, relevant agencies, and affected communities, and is subsequently verified by the Disaster Management Operations Control Center (Pusdalops). The results of the Initial Assessment provide the basis for determining emergency status and prioritizing response actions and inform the subsequent Rapid Needs Assessment (RNA) conducted by the Rapid Response Team (*Tim Reaksi Cepat*/TRC) or other multi-sectoral mechanisms to define the scale of response, resource requirements, and potential secondary or cascading risks. Based on BNPB Implementation Instructions No. 3 of 2022 concerning Rapid Needs Assessments (RNA) in Disaster Emergencies, a rapid needs assessment is conducted immediately following initial information on a potential hazard or emergency disaster event to generate timely, accurate, and reliable information to determine emergency status.

The RNA provides an overview of emergency alert (threatened) and emergency response (affected) status, covering: current and potential hazards; chronology of disaster events; conditions of threatened and affected areas; estimated population at risk disaggregated by region and demographics (gender, vulnerable and special needs groups, and women of reproductive age); disaster victim data (mortality, injuries, missing persons, and affected non-displaced

[27] The BNPB Rapid Response Team (TRC BNPB) is established by the Head of BNPB and comprises technical and non-technical agencies tasked with conducting rapid disaster assessments during emergency response, including Rapid Needs Assessment (RNA) and Damage and Loss Assessment (DALA), and providing technical support to Provincial and District/City BPBDs in emergency management, based on Head of BNPB Regulation No. 9 of 2008.

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populations); evacuees or quarantined populations; damage to housing, infrastructure, utilities, and productive land; socio-economic and education conditions; health and public health capacity; availability of facilities and equipment (transportation, electricity, etc.); evacuation routes and access; initial response actions by stakeholders; urgent emergency response needs; and other additional data or information based on the assessment.

Data collected from the Initial Assessment and RNA forms the basis for determining emergency status as well as the type and scale of activities required during the emergency response phase. For the purpose of E&S risk management, data collected from Initial Assessment and RNA, such as data on affected vulnerable groups, conditions of affected area, estimated number of safety equipment, and evacuation routes and access, can be further utilized to understand environmental and social conditions in the disaster-affected area before emergency activities are implemented.

3. Coordination Meeting

Based on the findings of the Initial Assessment and RNA, a coordination meeting for the sole purpose of agreeing on recommendations for the determination of the disaster emergency status. The meeting involves relevant stakeholders reviewing and validate the assessment results and reach a common understanding. This will serve as the basis for the formal determination of a disaster emergency status by the authorized official[28], which may take the form of an emergency alert, emergency response status, or emergency transition to recovery. This determination status marks the emergency operation, including the activation of emergency financing mechanisms.

5.1.2. During the Emergency Status

This sub-chapter outlines the disaster management process once an emergency status is officially declared. This includes (i) The determination of disaster emergency status; (ii) Activation of on-call budget (DSP) for the PFB emergency response phase; (iii) Activation of the command system/ command post; (iv) Emergency operation plan; (v) Implementation of emergency response; (vi) Emergency response progress assessment; (vii) Evaluation through the coordinating meeting for the implementation of status; (viii) Adjustment/ extension; (ix) Termination of emergency status; and (x) Emergency activity report and On-call budget accountability report. This phase is carried out under the special authorities granted by prevailing laws and regulations to ensure an effective, coordinated, and targeted response.

[28] Authorized official refers to the authorized level of government responsible for declaring disaster emergency status, namely the Regent/ Mayor, Governor, or the President, in accordance with BNPB Regulation No. 4 of 2020 concerning on the Use of On-Call Budget, depending on the scale and impact of the disaster.

In this stage, E&S Management is implemented as an embedded component of the emergency operational process through simplified, adaptive, and risk-based procedures. The primary focus of E&S management is to ensure the safety of workers and the community, the protection of vulnerable groups, and the control of environmental impacts resulting from emergency activities.

1. Determination of Disaster Emergency Status

In accordance with the BNPB Guidelines for Determining Emergency Status (2016), the Determination of Disaster Emergency Status is declared by the authorized official based on the initial assessment results and coordination meeting recommendations. This determination provides the legal basis for extraordinary actions[29], including large-scale resource mobilization and the utilization of emergency funding mechanisms. Based on Government Regulation No. 21 of 2008 concerning the Implementation of Disaster Management, the status of a disaster emergency can start from the emergency alert[30], emergency response[31], and emergency transition to recovery[32].The disaster emergency status is determined based on indicators below:

- Availability of resources (officers/personnel, logistics and equipment, and funding).
- The local government's capacity to lead and coordinate emergency response command system.
- The ability to carry out initial disaster emergency response activities.

2. Activation of On-Call Budget (DSP) for the PFB Emergency Response Phase

Based on BNPB Regulation No. 4 of 2020 concerning the Use of On-Call Budget, DSP is a fund that is always available and determined by the Government to be used during disaster emergencies, certain circumstances, and considerations of disaster risks that result in an area determined by the Head of BNPB. Following the declaration of emergency status by the authorized official, the PFB is activated to top up On Call Budget (DSP) to support PFB-funded emergency responses. The utilization of DSP is carried out according to Ministry of Finance

[29] Extraordinary actions refer to exceptional measures that may be lawfully undertaken by the Government following the formal declaration of a disaster emergency status. These measures include, but are not limited to, (i) the rapid mobilization and deployment of personnel, equipment, and logistics; (ii) the utilization of emergency financing mechanisms such as On-Call Budget/ DSP; (iii) the activation of emergency command and control systems; (iv) the temporary adjustment or simplification of administrative and procurement procedures; (v) the enforcement of evacuation orders and access restrictions for public safety; and (vi) the provision of immediate life-saving assistance and basic services to affected populations. Such actions are carried out with the scope and duration of the declared emergency status and in accordance with applicable laws and regulations.

[30] Emergency Alert Status is a condition where the potential threat of a disaster is leading to a disaster occurring, marked by information about an increase in the threat based on the early warning system in place and consideration of the impact that will occur in the community.

31 Emergency Response Status is a situation where a disaster threat has actually occurred and has disrupted the lives and livelihoods of a group of people/community.

32 Emergency Transition Status to Recovery is a situation where the threat of a disaster tends to decrease/subside in escalation or has ended, while disruption to the lives and livelihoods of a group of people/community still continues.

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regulations and applicable disaster funding mechanisms to support PFB-funded emergency responses.

3. Activation of the Command System/ Command Post

In accordance with BNPB Regulation No. 3 of 2016 on the Disaster Emergency Management Command System (*Sistem Komando Penanganan Darurat Bencana* – SKPDB), disaster emergency response is conducted under a single, unified command to ensure coordinated, effective, and efficient operations. Activation of the Command System and Command Post (Pos *Komando Penanganan Darurat Bencana* – PDB) establishes centralized decision-making, operational control, and field coordination during a declared emergency.

Upon declaration of emergency status, the Head of BPBD convenes a coordination meeting, chaired by the regional head (governor/ mayor/ head of district) or head of BPBD, if delegated, to appoint the PDB Commander and establish the command structure. The PDB Post's emergency organizational structure includes a Commander, Deputy Commander, Secretariat, Planning, Data-Information and Public Relations, agency representatives from emergency response clusters, and Operations Divisions. Activation of operational subdivisions depends on the disaster's type, scale, and required response. For medium- and large-scale disasters, coordination may involve civilian agencies, the military, and international partners as required.

The PDB Command Post functions as the operational controller of emergency response and is responsible for: (i) preparing and implementing emergency operational plans; (ii) conducting daily coordination meetings; (iii) disseminating timely information to the public and media; (iv) submitting daily Situation Reports (Sitrep) to relevant regional government agencies (OPDs); (v) operating on a 24/7 basis throughout the emergency period; and (vi) undertaking monitoring and rapid assessments to evaluate response progress.

As per BNPB Guideline No. 10 of 2023, the PDB Command Post shall establish a Grievance Redress Mechanism (GRM), managed by the Data, Information, and Public Relations Division, with multiple accessible channels for complaints from affected communities. The GRM ensures confidential, survivor-centered SEA/SH reporting and referrals, as well as periodic reporting via Sitreps and Progress Assessments, to support continuous improvement.

If a region has established disaster management clusters, all cluster activities operate within designated operational areas and are fully coordinated under the Disaster Management Command Post. Based on the Head of BNPB Decree No. 308 of 2024, the emergency response clusters provide a coordinated, multi-sector approach for emergency response activity, to be

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implemented by multiple ministries/agencies. This organizes key sectors into specialized clusters, such as:

1) Search and Rescue: This cluster, which is led by the National Search and Rescue Agency, provides integrated support and mobilization of search-and rescue operations for victims within the SKPDB, including search and rescue, emergency assistance, and evacuation. This cluster is also responsible for ensuring the provision of safe personal protective equipment and safety equipment, as well as community safety during search-and-rescue activities and emergency medical coordination.
2) Refugee and Protection: This cluster, which is led by the Ministry of Social, provides integrated support to coordinating assistance and protection for refugees and displaced persons during emergency response. This cluster includes several sub-clusters responsible for each task, which consist of Shelters, Sanitation (including provision of water supply, toilet, and waste facilities), Camp Management, Child Protection, Vulnerable Groups Protection, GBV Prevention and Handling (including SEA/SH prevention and management) and women empowerment, and Psychosocial Support. This cluster also includes a task team for community engagement and a technical team for Customary Communities/ IPs who are responsible for ensuring meaningful participation and engagement of the community and Customary Communities in emergency activity planning and implementation.
3) Logistics: This cluster, which is led by BNPB, manages logistics support and equipment through planning, recording, and distribution. This cluster is also responsible for ensuring occupational health and safety in material handling and transport, transparent and equitable distribution reaching vulnerable populations, ethical procurement.
4) Health: This cluster, which is led by the Ministry of Health, delivers integrated health services, informed by Rapid Environmental Health Assessments and coordination with other clusters. This cluster consists of several subclusters, including the health services subcluster (responsible for providing individual health services, particularly emergency assistance); the disease control subcluster (responsible for disease control, infectious disease surveillance and outbreak response), and environmental health subcluster (assessment of sanitation facility needs, including toilet, water supply, and waste management); the reproductive health subcluster (responsible for providing reproductive health services, including safe and confidential health services for SEA/SH cases); the mental health subcluster (responsible for addressing mental health and psychosocial issues); the nutrition services subcluster (responsible for providing nutritional services);

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and the Disaster Victim Identification (DVI) subcluster (responsible for identifying and managing deceased victims). This cluster is also responsible for ensuring OHS for healthcare workers and safe pharmaceutical management.

5) Education: This cluster, which is led by the Ministry of Education and Culture, mobilizes support for education facilities, child-friendly inclusive processes, and educators in emergency situations. This cluster is also responsible for ensuring accessible emergency education services, school construction with adequate sanitation (including drainage, toilet, water supply, and solid waste), and evacuation plans; inclusive education for children with disabilities and vulnerable groups; psychosocial support for trauma-affected children; culturally sensitive education materials; and child-friendly grievance mechanisms.

6) Recovery: This cluster, which is led by the Ministry of Home Affairs, delivers immediate recovery through emergency repairs, site cleanup (including for debris, waste, mud, volcanic ash, damaged material or items, hazardous and toxic waste), and data recovery for population, land ownership, and assets. This cluster also manages OHS provisions for debris removal (PPE); heavy machinery); hazardous waste management (asbestos, chemicals, fuels); solid waste segregation; protection of affected cultural heritage; land and property rights protection preventing land grabbing; stakeholder engagement on recovery prioritization; and grievance mechanisms for all recovery-related complaints.

4. Emergency Operation Plan (EOP)

An Emergency Operation Plan (EOP) is prepared by the Disaster Emergency Response Commander in accordance with Government Regulation No. 21 of 2008. It defines operational objectives, strategies, and technical measures for emergency response from the moment a disaster status is declared until the end of the emergency period. The EOP is developed using contingency plans, Rapid Needs Assessment (RNA) data, and disaster information to ensure safe, effective, and accountable response, and is formally approved and distributed to all relevant personnel for guidance and implementation.

The scope of activities covered in the EOP includes activating relevant contingency plans tailored to disaster conditions; analysis of initial disaster incidents based on initial assessment and RNA data; setting operational objectives, strategies and boundaries; resource mapping and allocation; tactical planning for achieving objectives; and prepare operation plan and monitoring systems for correction and adjustment. Core activities in the operation plan include search and rescue, victim

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evacuation, fulfillment of basic needs, protection of vulnerable groups, provision and distribution of logistics and personnel, emergency health services, temporary shelter, clean water and sanitation, and restoration of vital infrastructure. The emergency operational plan document also defines operational action plans, command and organizational structures, assignments, disaster location maps, communication network allocation, medical support plans, air operations transportation plans, instruction for safety, and monitoring and evaluation plans.

Once approved by the Commander, the operational plan is distributed to all relevant personnel, followed by disaster emergency status briefings based on disaster maps, latest weather forecasts, and completion of missing data. The established operational plan is valid for a specific operational period for field implementation.

5. Implementation of Emergency Response

Implementation of emergency response is defined as a series of immediate actions undertaken during a disaster to control threats and reduce impacts, as stipulated in the Regulation of the Head of BNPB No. 3 of 2016 on the Disaster Emergency Management Command System. Emergency response operations are implemented under the Disaster Emergency Response Command System (SKPDB) and led by the Commander, with execution carried out by the Operations Division. The Operations Division holds full responsibility for planning and implementing emergency actions based on a unified response plan, while resource mobilization is conducted at the appropriate government level (district/city, provincial, or national), with support from BNPB when local capacities are insufficient.

The scope of emergency response implementation covers six operational divisions that correspond to disaster response clusters that have been discussed above. These divisions carry out activities that include those listed in emergency response activities in Annex 2b such as search and rescue, victim evacuation, logistics distribution, emergency health and nutrition services, debris removal and emergency repairs, refugee shelter and protection, water and sanitation provision, emergency education, and early economic and service recovery.

Emergency response implementation includes rapid Environmental and Social (E&S) risk assessment and management embedded in the implementation processes. Several rapid assessments are conducted as part of activity preparation, with more comprehensive E&S management instruments developed as operations transition from emergency response to recovery. Rapid E&S Assessment that is embedded in this stage include stakeholder engagement focusing on vulnerable groups prior to shelter/temporary housing site determination, land due

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diligence assessment before provision of shelters/ temporary housing, vulnerable group needs assessment to inform inclusive emergency assistance, rapid assessment to identify disaster impacts on cultural heritage assets prior to protect/covering affected cultural heritage, identify immediate needs for safe water, sanitation facilities, and waste disposal infrastructure to prevent disease outbreaks is conducted before establishing health facilities, shelters, and water/ sanitation services, provision of safe drinking water provision and prevent waterborne diseases is conducted before water distribution activities, identify structural instability before rescue operations and debris removal to avoid worker safety and community safety risks, hazardous material screening is conducted before debris removal and site cleanup, identification of areas prone to disaster risks before selecting shelter location, and identification of environmental conditions (e.g., land stability, working area etc) is conducted before debris removal and excavation.

E&S management is integrated into each operational division according to the nature of activities. For example, activity in the Rescue and Evacuation Division includes occupational health and safety risks management for personnel in hazardous conditions; the implementation of Health activities include activity to ensure medical waste handling, infection prevention, reproductive health services, and mental health support; the Evacuation and Protection Division implements inclusive and safe shelter design, child protection, gender-segregated sanitation provision, culturally appropriate services for customary communities; the Emergency Recovery Division addresses hazardous materials, worker safety, and protection and preservation of affected cultural heritage; the Logistics Division ensures their activity consider safe storage and handling of supplies, equitable distribution, and transparent grievance mechanisms; and the Early Recovery Division supports inclusive livelihoods supports.

The Emergency Response Commander conducts daily evaluation meetings to plan subsequent activities, with evaluation results documented in daily Situation Reports (Sitrep) submitted to the Head of BPBD or BNPB covering implementation status, human resource deployment, equipment availability, logistics quantities, resource distribution, E&S management measures (e.g., consultation with stakeholders), ensuring orderly and accountable emergency operations.

6. Emergency Response Progress Assessment

Based on the BNPB Implementation Guidelines for Emergency Response Progress Assessment No. 6 of 2023, periodic Emergency Response Progress Assessment is conducted to update and evaluate the initial RNA results. This assessment reviews the implementation and effectiveness of disaster emergency management to support decision-making on the disaster emergency

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status, including the termination, extension, or modification of the emergency response period and related funding. The assessments evaluate the progress of the emergency response, the effectiveness of resource utilization, and the emerging risks or problems. It updates information on disaster threat developments (duration, likelihood, potential secondary hazards, and affected area coverage); rescue and evacuation outcomes (search and rescue, emergency assistance, and evacuation); basic needs provision (water and sanitation, food, clothing, health services, psychosocial services, and temporary housing); protection of vulnerable group protection results including (rescue, evacuation, security, and health and psychosocial services); and immediate restoration results for vital infrastructure and facilities (site cleaning and emergency repairs).

Progress assessment data are analyzed against operational plan targets to produce evaluation reports on the implementation of rescue and evacuation activities, fulfillment of basic needs, vulnerable group services, and early recovery of vital infrastructure. Based on the findings of evaluation reports, recommendations are submitted to the Regional Head to support decisions on shortening or extending the disaster emergency response period.

7. Evaluation through the Coordination Meeting for the Implementation Status

Evaluation through coordination meetings reviews progress assessment results and determines necessary adjustments as follow-up to data analysis and evaluation conducted within the SKPDB. The meeting reviews operational plan implementation, field developments, ongoing challenges, and resource requirements based on data analysis from monitoring and Rapid Needs Assessments (RNA).

The meeting serves as the decision-making forum where regional government agencies, technical agencies, and relevant stakeholders jointly assess whether emergency response objectives are being achieved and formulate recommendations on the continuation, adjustment, or termination of emergency status for submission to the Regional Head.

8. Adjustment/ Extension

If the emergency situation remains uncontained, adjustment or extension of the emergency status and operational plan is implemented through geographic expansion, activity type changes, or additional resource mobilization. Decisions are supported by monitoring and evaluation mechanisms utilizing RNA forms to ensure they are based on updated field data. Any adjustment or extension returns to emergency response implementation with E&S risk management and strengthened mitigation measures.

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Emergency response period may be shortened when disaster threats have ended, no secondary hazards or area expansion are anticipated, evacuees have returned, and community life has normalized. It may be extended when threats persist or escalate, secondary hazards or expansion remain possible, evacuees have not returned or been relocated, and cleanup or emergency repairs are incomplete. The status may transition to recovery when threats have ended and conditions are stabilizing, but evacuee return, site cleanup, and emergency repairs remain ongoing.

9. Termination of Emergency Status

The Emergency Status is formally terminated by the Regional Head when emergency response is no longer required, based on verification that emergency objectives have been achieved. The process of determining changes to the state of emergency for a disaster begins with an ongoing evaluation of the field situation. This evaluation covers several key aspects, such as:

a. Disaster threats and risks eliminated with no potential secondary disaster.
b. Basic needs and emergency services delivered to affected communities.
c. Vital infrastructure, health services, and logistics access restored.
d. Institutional capacity, resources, and recovery plans ready for rehabilitation phase.

The termination decision is based on monitoring and evaluation data, ensuring the transition is measured, evidence-based, and coordinated across all relevant sectors.

10. Emergency Activity Report and On-Call Budget Accountability Report

The final stage involves the preparation of two primary reports: (1) the Emergency Activity Report documenting implementation and outcomes of emergency response activities and (2) the On-Call Budget Accountability Report accounting for emergency fund utilization.

The Emergency Activity Report, prepared at the end of the emergency response phase, consolidates information from daily Situation Reports (Sitreps) compiled throughout the emergency period, RNA-based assessment forms, operational monitoring data, emergency response progress assessments, and coordination meeting outcomes, with Sitreps compilation providing chronological records of emergency operations, resource deployment, and E&S management measures (e.g., consultation with stakeholders) implementation forming the foundation for comprehensive activity documentation and performance evaluation. The On-Call Budget Accountability Report documents all emergency fund expenditures including resource mobilization, logistics procurement, personnel deployment, and E&S mitigation measure

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implementation, ensuring transparent and accountable financial management of the On-Call Budget throughout the disaster emergency response period.

5.2. INTEGRATION OF E&S REQUIREMENTS IN EXISTING PROCEDURES

The emergency response phase requires rapid, intensive, and well-coordinated actions. Emergency response activities range from planning to operations with E&S risks varying from low to high. Activities such as rescue and evacuation, provision of water, health services, and temporary shelters, distribution of equipment and logistics, and transportation may trigger environmental risk and impacts including water contamination, infectious or hazardous waste, soil contamination, and environmental degradation. These risks may be increased if the setting is located in ecologically sensitive or unstable areas. Social risks may include threats to community health and safety, spread of infectious diseases, lack of privacy in temporary shelters leading to increased risks of violence or protection issues (especially for women and children), and social tension associated with targeting errors during distribution of emergency assistance such as food, clothing as well as services provision such as education and health .

Although the emergency response phase is implemented under urgent and time-limited conditions, E&S assessment process is embedded within existing disaster emergency mechanisms. The Initial Assessment and Rapid Needs Assessment (RNA) provide initial data to understand E&S conditions in the affected area before implementation of emergency response activities, including preliminary data to assess OHS and CHS risks and impacts, and the protection of vulnerable groups. These assessments are complemented by ongoing information gathered through stakeholder engagement during emergency operations, such as community feedback at evacuation sites, temporary shelters, and service points.

Furthermore, E&S considerations are gradually refined through activity-specific assessment requirements applied during the preparation of the Emergency Operation Plan and throughout the implementation of emergency response activities. For example, land use and CHS assessment prior to the construction of temporary housing/shelters; waste management and sanitation arrangements are adjusted based on environmental and public health conditions; and protective measures are strengthened in response to identified SEA/SH risks or emerging social tensions within affected communities. E&S management requirements during emergency response are already integrated into the national emergency response process, from the commencement of disaster emergency throughout the emergency status period. These

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requirements are applied by using existing instruments, such as operational guidelines, standard operating procedures (SOPs), emergency operational plans, and emergency response mechanisms which have included E&S management aspects.

The table below demonstrates that E&S safeguards are inherently integrated into emergency response activities. The PFB ESMS serves to strengthen consistency, documentation, and monitoring through a risk-based approach and operational checklist.

Table 5.1 Existing E&S Management Practices in Emergency Response Activities

No.	Emergency Response Activities	Potential E&S Risk and Impact	Current Practices Related to E&S Aspects
1.	Search, victim evacuation and affected communities	- OHS risks for search and rescue personnel. - Improper waste handling (e.g. hand gloves, masks, disinfectants, if any, etc.). - Social tension resulted from inequitable targeting and exclusion. - SEA/ SH risks during rescue and evacuation.	- The search and rescue personnels are required to have basic competencies/ trained in personal and team safety, initial location assessment, hazard identification, and cross-sector coordination and field communication. - Implementation of OHS for search and rescue personnels and volunteers, including the use of PPE and safety equipment appropriate to the risks involved. - All activities are conducted based on RNA that prioritize severity level and vulnerable groups, in a manner that respects the culture, customs, and local wisdom, with the active participation of the affected communities. - Stakeholder engagement and field communication lead by search and rescue cluster. - Wastes are managed according to applicable regulations related to waste management during emergency. It includes waste segregations, collection, transportation, and treatment.
2.	Emergency relief/ aid	- OHS risks during distribution of logistics. - Social tension resulted from inequitable targeting and exclusion. - SEA/ SH risks in aid distribution.	- Distribution of logistics and equipment utilizes various modes of transportation selected based on security and safety considerations. - Logistics are arranged to ensure safe distribution and prevent social conflict. Aid distribution is coordinated and based on the needs of the RNA results, ensuring transparent and equitable distribution processes that prioritize vulnerable groups. - Emergency relief/ aid activities are implemented through coordinated participation of

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No.	Emergency Response Activities	Potential E&S Risk and Impact	Current Practices Related to E&S Aspects
			stakeholders and affected communities, taking into account cultural and socio-economic conditions.
3.	Provision of clean water and sanitation services (WASH)	- Soil and water contamination and disease spread due to inadequate WASH infrastructure (e.g., Soil and water contamination from inadequate sanitation and high volume of wastewater; vector breeding grounds if latrines improperly managed). - OHS risk associated with outreach activities that are located in remote and difficult areas. - Inequitable access, gender and cultural appropriateness concerns. - SEA/SH risks. - Water withdrawal disturbing ecosystem services, if location of water sources is distant from the affected area.	- Clean water is provided with due consideration to the safe distance between water sources and sanitation facilities to prevent contamination. Water supply also ensures sufficient quantity per person in accordance with the applicable Minimum Service Standards (SPM). - All volunteers and workers are registered at the command post to ensure proper coordination, monitoring, and protection of personnel involved in the distribution of clean water to remote areas. - Proper domestic wastewater management is implemented to prevent leakage into water sources, groundwater, or rivers that may result in water pollution. - Vector-borne disease prevention and control measures are implemented to prevent public health risks among displaced persons. - WASH facilities are designed to be culturally appropriate, gender sensitive, and accessible for all, including vulnerable groups. - Provision of WASH facilities and distribution methods are planned in consultation with affected communities and stakeholders. - Provision of safe distribution mechanisms for remote or hard-to-access areas.
4.	Food assistance	- Improper waste handling, including food waste/domestic waste. - Social tension resulted from	- Implementation of waste management, for instance, at the waste sources in refugees' shelter areas. Waterproof waste bins with lid are provided and the locations for waste segregation are determined. - Food handling practices are implemented in accordance with applicable hygiene standards

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No.	Emergency Response Activities	Potential E&S Risk and Impact	Current Practices Related to E&S Aspects
		inequitable targeting and exclusion. - OHS risk associated with outreach activities that are located in remote and difficult areas. - SEA/SH risks during distribution.	to prevent contamination and associated health risks, as well as nutrition standards. - The recipients of food assistance are identified and targeted based on RNA that prioritizes vulnerable groups. - Distribution methods are planned in consultation with affected communities and stakeholders, ensuring inclusion of adjustment needs for vulnerable groups. The quality, quantity, and schedule of food rations are communicated to recipients in advance. - Distribution points are located near temporary settlements to ensure easy and safe access. - Distribution methods are selected based on security and safety considerations. - All volunteers and workers are registered at the command post to ensure proper coordination, monitoring, and protection of personnel involved in the food distributions to remote areas.
5.	Clothing assistance	- Improper waste handling related to clothing services. - Social tension resulted from inequitable targeting and exclusion and cultural and gender appropriateness concerns. - OHS risk associated with outreach activities that located in remote and difficult areas. - SEA/SH risks during distribution.	- Provision of clothing assistance is targeted based on need assessment (gender, age, and special circumstances) prioritizing vulnerable disaster victims. - Distribution of clothing assistance is conducted without discrimination and with due consideration to dignity, safety, and cultural appropriateness. - Implementation of waste management, for instance, at the waste sources in refugees' shelter area. Waterproof waste bins with lid are provided and the locations for waste segregation are determined. - Distribution methods are selected based on security and safety considerations and are planned in consultation with affected communities and relevant stakeholders. - All volunteers and workers are registered at the command post to ensure proper coordination, monitoring, and protection of personnel involved in the distribution of logistics to remote areas.
6.	Health services	- CHS risks associated with	- Emergency health services are operated in accordance with national health crisis

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No.	Emergency Response Activities	Potential E&S Risk and Impact	Current Practices Related to E&S Aspects
		disease transmission and infection risks. - Improper medical and hazardous waste handling from health services. - Generation of domestic wastewater from the facility. - Social tension resulted from unfair access to health services. - OHS risk associated with exposure of health workers to disease transmission or infections. - SEA/ SH risks in service delivery.	management standards and coordinated by the health cluster under the disaster emergency command system. - Health services are delivered based on rapid health assessments, prioritizing patient safety and vulnerable groups such as women, children, elderly persons, persons with disabilities, and other at-risk populations. - Health service delivery ensures privacy, confidentiality, and culturally appropriate care. - Infection prevention and control measures are applied and coordinated by the disease control and environmental health sub-cluster, including the use of personal protective equipment, vaccination (as applicable), and standard precautions to protect patients, health workers, and surrounding communities. - Medical waste management is implemented in accordance with applicable national health crisis management standards. It follows the SOP for Medical Waste – Emergency Medical Teams, including but not limited to waste identification through color-coding, safe handling procedures, and appropriate treatment and disposal methods. - Protection of health workers and medical volunteers through OHS standards and protocols from the health sector. - Management measures and referral pathways for SEA/SH cases are integrated into emergency health operations, including survivor-centered grievance handling, provision of health services for survivors, and distribution of dignity kits coordinated by the Reproductive Health Sub-Cluster. - Information on the provision of health services and updates is openly disclosed to affected communities. Communities are actively engaged in health services to provide input and participate in service planning and implementation.
7.	Education services	- Social tension resulted from unfair	- Guidelines for the Provision of Education in Emergency Situations issued by the Ministry of

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No.	Emergency Response Activities	Potential E&S Risk and Impact	Current Practices Related to E&S Aspects
		access to education services. - OHS and CHS risk arising from education service delivery in emergency settings (e.g., unsafe facilities, crowding, travel/security, SEA/SH risks). - Construction waste (e.g., wooden material, debris).	Education in 2018 provide detailed mechanism and minimum standards and key indicators to be achieved in the delivery of education services during emergency. Key requirements include non-discrimination, safe route, access, and buildings/ facilities for students and the educators, adequate water and hygiene facilities, clear compensation mechanism for the educators, transparent and accountable supervision mechanism, the implemented by relevant stakeholders, provisions of inclusive education services, etc.
8.	Protection of vulnerable groups and special needs	- Social tension resulted from inequitable targeting and exclusion. - OHS associated with outreach activities that are in remote and difficult areas. - SEA/SH risks.	- Provision of goods and services tailored for the vulnerable groups and special needs based on reliable data identified during the RNA. - Provision is in place to actively engage vulnerable groups in planning and implementation of emergency disaster activities, in particular active engagement with women, people with disabilities, etc. - Technical team on Customary Communities is formed ensuring inclusion of IPs engagement in relevant activities. - All volunteers and workers are registered at the command post to ensure proper coordination, monitoring, and protection of personnel involved in the activities to remote areas.
9.	Repair of vital infrastructure and structural mitigation	- OHS risks associated with the vital infrastructure reconstruction and/or rehabilitation activities include (i) physical hazards: unstable structures, work at height, excavation/ground collapse, electrical and energized systems, lifting and	- Reconstruction and/or rehabilitation of the affected vital infrastructures is typically led by different general directorate of Ministry of Public Work, in collaboration with relevant stakeholders such as BNPB and local government. Relevant directorate of the Ministry of public works has developed guidelines for implementing the work, for example the guidelines for implementing emergency response to natural disasters affecting roads and bridges as issued by Bina Marga Directorate. The guidelines outline detailed

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No.	Emergency Response Activities	Potential E&S Risk and Impact	Current Practices Related to E&S Aspects
		material handling, heavy equipment movement, noise, vibration, slips/trips/falls; (ii) chemical hazards: dust, silica, asbestos (if present), solvents, fuels. - Construction waste. - CHS risks associated with generated dust, noise, vibration, traffic and road safety. - Potential negative impacts on cultural heritage. - Social tension resulted from exclusion of community participation. - Increased traffic from mobilization of construction vehicle	mechanism and arrangement for reconstruction/ rehabilitation of bridges and roads including mitigation for the OHS and CHS risks associated with the activities such as: (i) Implementation of OHS includes the use of PPE and safety equipment appropriate to the risks involved; (ii) Traffic is diverted to alternative routes when roads or bridges are damaged or unsafe for passage. Road diversion signs are installed accordingly. - Technical personnels possess the required technical competence and experience in the implementation of emergency recovery techniques in the field, to ensure constructions meet the safety standards. - Provision of a safe method based on the impact on roads and bridges. - Impact management procedures for affected cultural heritage in the emergency response phase, including mitigation measures involving relevant experts, are covered in the Guidelines for Disaster-Resilient Cultural Heritage by Ministry of Education and Culture. - Waste management is implemented in accordance with waste management regulations during disaster management. It includes waste segregations, transportation, and treatment.
10.	Preparation and activation of early warning systems	- OHS risks for personnel installing/ maintaining systems. - Perceived negative impacts associated with activity (false alarms, community distrust). - Social tension resulted from land	- Dissemination of warning information quickly and easily understood by the public. - Cross-agency coordination to ensure the accuracy and consistency of information. - Inclusive warning systems accessible to persons with disabilities (visual, auditory signals). - Community consultation on land use, system location and design. - Assessment to prepare early warning installations including assessment on land use.

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No.	Emergency Response Activities	Potential E&S Risk and Impact	Current Practices Related to E&S Aspects
		use for system installation. - Accessibility issues for persons with disabilities. - Communication barriers for vulnerable groups.	- Culturally appropriate communication for local communities, including Indigenous communities where relevant. - Grievance mechanisms for land use concerns. - OHS for workers including PPE and safe work method protocols.
11.	Provision of housing (*Huntara*)	- Land dispute and land use issues. - Social tension related to unfair distribution or dispute on site, selection). - SEA/ SH risks temporary housing settings. - Accessibility for persons with disabilities. - OHS risks during construction. - CHS risks associated with generated dust, noise, vibration, fire safety, structural stability. - Habitat loss and biodiversity reduction if construction materials are sourced unethically. - Soil and water contamination from domestic wastewater and solid waste from Huntara activities	- Due diligence on land use ensuring that the land to be utilized is clean and clear. - Provisions are in place for meaningful consultation and engagement with affected communities when determining location of temporary housing. - The selection of locations and the design of temporary shelters considers physical safety from secondary hazards, environmental impacts (for example, avoiding conservation areas, avoiding hazardous materials for construction (including asbestos), access to basic services, security and safety aspects (assess crime rates, conflict areas, the presence of security services, and potential gender-based violence), access to domestic solid waste and wastewater management. - Survivor-centered GRM accessible to residents - Women's participation in camp management - Construction activities are implemented in accordance with applicable Occupational Health and Safety (OHS) regulations, including the mandatory use of appropriate Personal Protective Equipment (PPE) by workers and the preparation and implementation of Method Statements. - Safe shelter construction meeting fire safety and structural standards. - Materials for temporary shelters construction are sourced close to the location without damaging environment. - The design of Huntara considers several aspects such as but not limited to, it is designed by competent persons, provision of proper

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No.	Emergency Response Activities	Potential E&S Risk and Impact	Current Practices Related to E&S Aspects
		- Water withdrawal disturbing ecosystem services. - Soil erosion and waterborne disease if drainage is inadequate. - Construction waste, including asbestos (if any). - Accidents due to increased traffic from mobilization of construction vehicle.	sanitation and hygiene based on *Standar Pelayanan Minimum*. - Waste management in temporary shelters (*Huntara*) is, in principle, based on the national legal framework for waste management in Indonesia. Waste in is managed through segregation, collection, and proper disposal.
12.	Empowerment of disaster-affected community groups	- Social tension resulted from targeting error during distribution of Assistance for small- and medium-scale production tools/ machinery, Cash for Work (Labor-Intensive Cash Assistance); and Maintenance of livestock and plant seedlings. - SEA/ SH risks in cash-for-work programs (exploitation for employment).	- Transparent and clear communication about the program. - Community participation in planning and monitoring activities. - Fair wages and working conditions for cash-for-work programs. - Targeted support for vulnerable groups (female-headed households, persons with disabilities, Indigenous Peoples) based on reliable data generated during the RNA. - Accessible and responsive grievance mechanisms.

Table 5.1 indicates SEA/SH risks are present across all emergency response activities. The heightened vulnerability of disaster-affected populations, combined with power imbalances in emergency assistance delivery, further increases the risk of SEA/SH if not proactively mitigated.

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SEA/SH risks manifest differently across clusters: in rescue operations risks stem from authority of personnel over vulnerable victims; in shelters, from overcrowding and weak security; in health services, from the intimate nature of care and patient dependence; in aid distribution, from desperation for assistance; in education, from educator-child power asymmetries; and in infrastructure and livelihood programs from worker influx into affected communities.

For emergency response activities, SEA/SH risk management follows the existing guidelines on gender-based violence prevention and management during disaster emergency by Ministry of Women Empowerment and Child Protection. The existing procedures already include SEA/SH risk and impact assessments in disaster emergency; standards and procedures for the prevention and response to SEA/SH (integrated into the search and rescue activities, delivery of basic needs, temporary shelters and housing, water and sanitation services, health, education, psychosocial services, and security); a survivor-centered approach; complaint handling and referral pathways; human resource capacity; as well as coordination and operations lead by the Gender-Based Violence Prevention and Response Sub-Cluster under the Refugee and Protection Cluster within Disaster Management Command System).

All current practices related to the E&S aspects of emergency response activities listed in Table 5.1 are embedded in emergency command post structures and involve a broad range of stakeholders. Sector and technical line ministries and agencies lead the implementation for their respective activities (for example, health activities lead by Ministry of Health, infrastructure activities lead by Ministry of Public Works, and activities related to refugees and protection lead by Ministry of Social, etc.), with the involvement of local governments/agencies. Therefore, strong horizontal and vertical coordination, within BNPB and with line ministries/agencies is essential to ensure continuous application of E&S measures.

To strengthen monitoring, this ESMS incorporates a monitoring checklist in Table 5.2 to support consistent implementation and systematic review of E&S practices across ministries and agencies. The checklist consolidates existing E&S practices from various ministries and agencies into a single, structured format for clearer monitoring and documentation. It aims to facilitate a more systematic reviews of E&S compliance in emergency response activities and to assess the effectiveness of E&S management in time-sensitive emergency contexts. Insights gained from this process can help evaluate and inform future E&S management practices in emergency contexts. For implementation, Annex 20 provides a practical template for its application.

Table 5.2 E&S Monitoring Checklist to Strengthen Current E&S Management Practices

No	E&S Safeguard Aspects	Monitoring Checklist	Source of Information
1	Employment and Occupational Health and Safety (Provision of employee terms and conditions, social security, OHS, worker grievances, incidents, and accidents).	Are emergency workers (including SAR personnel, volunteers, contracted workers, health staff etc.) engaged in accordance with applicable national employment regulations, BNPB and ministerial regulations (including contractual agreement that contains employment term and conditions, no child and forced labor, provision of social security)?	Sample of workers and contractors' contractual agreement
		Are workers using standard PPE and applying occupational safety protocols based on existing guidelines?	- Observation/ documentation during construction/ activities - Emergency Activity Report
		Are there any incidents or occupational accidents during emergency response activities?	Contractor Report
		Is there any worker grievance submitted through the available channels? If so, how was the grievances are resolved?	Grievance logs
		Are workers adequately trained and informed about OHS risks including SEA/SH risks and code of conduct requirements?	- Documentation of capacity building activities - Certification related to OHS as relevant
		Are there health and safety instructions carrying out emergency operations?	Emergency operation Plan Form
2	Pollution prevention, efficient water use (waste management and prevention of water contamination)	Are hazardous and non-hazardous wastes including medical wastes being managed properly, with appropriate waste bins provided, segregation carried out in designated areas, and proper collection and disposal methods in place?	- Observation/ documentation during implementation of activities - Clean up Implementation Report *(Laporan Pelaksanaan*

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No	E&S Safeguard Aspects	Monitoring Checklist	Source of Information
			Pembersihan Lingkungan)
		Are there any incidents of spill or release of pollutants from the hazardous wastes/materials to the environment? If so, how was it managed?	Observation/ documentation during implementation of activities
		Are wastewater from the sanitation facilities managed adequately to prevent environmental pollution?	Observation/ documentation during implementation of activities
		Are water sources managed properly to ensure sufficient quantity for each person?	- Observation/ documentation during implementation of activities. - Emergency Progress Report
		Is the construction or operation of activity use water in area with short supply? If yes, have there been any observed changes to water sources or any neighbor complaints regarding water availability or supply?	Observation/ documentation during implementation of activities.
		Is the construction or operation of activity use raw materials with legal/ethical sourcing, without damaging the environment?	- Observation during construction activities and provision of services - Interview with service providers and affected communities

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No	E&S Safeguard Aspects	Monitoring Checklist	Source of Information
		Are there any circumstances of localized flooding or stagnate water, causing destruction of vegetation or topsoil, damage to infrastructure, and breeding grounds for mosquitoes and other pests? If yes, how was this managed?	- Observation during construction activities and provision of services - Interview with service providers and affected communities
3	Community Health and Safety (traffic management, fire safety, management of hazardous waste, emergency respond and preparedness, SEA/SH risk management)	Are emergency facilities and services (temporary shelters, WASH, health posts, emergency education) safe, culturally appropriate, and accessible? ▪ WASH facilities are gender segregated. ▪ Facilities accessible and safe to the vulnerable groups such as persons with disabilities. ▪ Safe water supply and sanitation standards applied. • Temporary shelters are structurally safe, not located in high-risk areas, and equipped with adequate lighting, ventilation, fire equipment and access control to ensure community safety.	- Field observation/ documentation during implementation of activities. - Emergency Progress Report
		Are disease prevention and public health measures implemented in coordination with health authorities?	- Health crisis initial and progress assessment document, focusing on efforts that have been done by the disease control and environmental health sub-cluster - Interview with health cluster/ workers and affected communities

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No	E&S Safeguard Aspects	Monitoring Checklist	Source of Information
		Are SEA/SH risks to affected communities identified and mitigated? For example, shelters have lighting and security measures, gender segregated sanitation facilities, safe and confidential SEA/SH reporting channels operational, survivor-centered health services and referral pathways established.	- Monitoring and Evaluation Checklist regarding Protection of Women and Children from Gender Based Violence During Emergency Activities - Observation during construction activities and provision of services - Interview with service providers and affected communities
		Are traffic diversion signs in place to inform the community of safe routes?	Observation during implementation of activities.
		Are there any traffic incidents occurred in the area? If yes, how was it managed?	- Observation during construction activities and provision of services - Interview with service providers and affected communities
4	Land use (Land status clean and clear, absence of land disputes, no forced and involuntary resettlement)	Is the land used for the activity clean and clear, as verified by the completeness and validity of all required legal and supporting documents?	- On Call Budget Accountability Report, particularly in Form 3E: Decree of the Regional Head regarding land

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No	E&S Safeguard Aspects	Monitoring Checklist	Source of Information
	*Only applicable for provision of temporary shelters/ housing and early warning installation)		determination (location, area, and land status); Letter of statement from the landowner stating that their land is willing to be used for relocation; Document proving the feasibility of the function/zone - Assessment report of early warning preparation
		Has consultation with affected communities been conducted in determining the site location and relocation and is there documented evidence to prove this consultation?	Minutes or documentation of consultation
		Have any complaints regarding land use for activities been properly addressed and resolved to the satisfaction of the community?	- Grievance log - On Call Budget Accountability Report: Community testimonials on the temporary shelter field review form
5	Biodiversity Conservation and Sustainable Management of Living Natural Resources	Does the selection of temporary shelter locations take environmental impacts into account, such as avoiding conservation zones?	On Call Budget Accountability Report, particularly in Form 3E: Supporting Documents for Function/Zone Feasibility (Recommendations from relevant agencies regarding the suitability of land that is safe from disasters, does not

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No	E&S Safeguard Aspects	Monitoring Checklist	Source of Information
			damage the environment, etc.)
		Are the construction and/or temporary shelters located in protected areas? If so, are permits from relevant Ministry (i.e., Ministry of Forestry) or agencies already obtained?	- Field observation - Interview with command post / cluster refugee and protection
		Have there been any encounters with biodiversity (e.g., protected species, nesting sites)? If yes, how were they identified and managed?	- Field observation - Interview with command post / cluster refugee and protection
6	IPs engagement *Only applicable if activity trigger risk and impact to IPs	Is there an IP/customary community technical team within the evacuation and protection cluster that is involved to ensure IP involvement in emergency response activities?	- Field observation - Interview with command post / cluster refugee and protection and IP representatives
		Are IPs meaningfully included in the planning and implementation of emergency disaster activities?	- Minutes of consultation - Documentation of implementation of activities that consider IP needs and inputs - Interview with IP technical team or IP representatives
		Where temporary housing or emergency facilities affect IP lands or areas, was proper consultation and consent obtained?	- Minutes of consultation - Interview with IP technical team or IP representatives
		Is there an accessible and culturally appropriate grievance mechanism for IP communities?	- Documentation of established grievance channels - Grievance logs
7	Cultural heritage	Has screening been conducted to identify the presence of cultural heritage in affected or intervention areas?	Cultural heritage rapid assessment

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No	E&S Safeguard Aspects	Monitoring Checklist	Source of Information
	*Only applicable if activity trigger risk and impact to cultural heritage		during disaster emergency by BPCB
		Are measures in place to protect cultural heritage during emergency response activities, aligned with the Guidelines for Disaster-Resilient Cultural Heritage, being applied during emergency response?	Procedures to protect cultural heritage affected by emergency response
		Are qualified cultural heritage experts involved in assessing and managing impacts?	Report of protection cultural heritage during disaster emergency
		Is coordination maintained with relevant authorities and affected communities regarding cultural heritage management?	Minutes consultation / documentation of coordination/ consultation with cultural authorities
8	Stakeholder engagement (stakeholder identification, meaningful consultation, information disclosure, grievance redress mechanism)	Are emergency activities planned and operated based on inclusive stakeholder engagement involving affected stakeholders and communities?	- Completion report - Minutes consultation or documentation that present involvement of affected communities and vulnerable groups - Interview with emergency response team and affected communities
		Are information related activities (early warning information, food distribution details, health and education services, temporary housing, etc.) accessible and disclosed in a timely, transparent, and culturally appropriate manner?	- Information and communication materials produced during emergency response activities - Interview with emergency response team and affected communities

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No	E&S Safeguard Aspects	Monitoring Checklist	Source of Information
		Is provision of assistance and services (WASH, food, clothing, health, temporary housing) culturally appropriate, inclusive, and gender-sensitive?	- Field observation/ Documentation of provision of assistance and services - Report from provision of assistance and services - Interview with emergency response team and affected communities
		Is a functioning and accessible GRM established in the emergency post?	- Documentation of established grievance channels - Grievance logs - Interview with affected communities

CHAPTER 6.
GOVERNANCE AND ORGANIZATION

To ensure the effective implementation of the PFB ESMS, a governance and organizational structure was established to manage ESMS implementation, including monitoring and evaluation.

This chapter describes the institutions and individuals responsible for ESMS management in the PFB, including the roles of relevant ministries and agencies in ESMS implementation, to support accountable decision-making and effective coordination in managing and implementing the PFB ESMS.

6.1. OVERVIEW OF PFB GOVERNANCE

Based on Ministry of Finance Regulation (PMK) No. 28 of 2025 on the Disbursement of the Disaster Risk Financing Pool Fund (PFB), the disbursement process involves several sequential stages with clearly defined institutional responsibilities. The process begins with the mobilization and management of PFB resources, which is under the authority of the Minister of Finance, while the funds are administered and invested by the Indonesian Environment Fund (BPDLH) as the fund manager.

For pre-disaster and post-disaster activities, ministries/agencies or subnational governments (Pemda) submit a formal funding request to the National Disaster Management Agency (BNPB), which is responsible for conducting technical review, verification, and evaluation in coordination with relevant institutions, including the Coordinating Ministry for Human Development and Cultural Affairs (Kemenko PMK) for coordination; Ministry of Finance, Ministry of National Development Planning (Bappenas), and Ministry of Home Affairs for obtaining considerations. Based on the results of these recommendations, BNPB issues a funding recommendation, which serves as the basis for the ministry/agency or subnational government to propose budget allocation or DIPA revision to the Directorate General of Budget (DJA), following budget approval.

Below is the detailed responsibility of parties involved in the management of the Disaster Pooling Fund (PFB) are as follows:

a. The Ministry of Finance

The Ministry of Finance has the authority and responsibility for managing the PFB in accordance with prevailing laws and regulations. This includes (i) collecting funds from the

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State Budget (APBN), as well as from Regional Budgets (APBD) and other lawful sources through planning and budgeting mechanisms; (ii) developing the funds through short- and/or long-term investments; (iii) disbursing funds to and/or through Ministries/Agencies and regional governments for disaster management activities; (iv) making payments to goods and service providers financed by the PFB; and (v) ensuring proper reporting on the management and utilization of the Fund in compliance with applicable laws and regulations. Ministry of Finance also has a role to provide considerations for proposals submitted by the potential proponents based on the following criteria: (i) Regional fiscal capacity/capacity, and (ii) Alignment of budget planning with APBD realization/performance (comparison of remaining budget between planning and realization). Specific PFB functions are carried out by designated directorate/agencies under the Ministry of Finance, as described below:

- **Directorate General of Economic and Fiscal Strategy (DJSEF)** ensures financial sustainability, fiscal resilience, and investment governance in the entire PFB ecosystem. The Ministry of Finance through DJSEF Initiated the establishment of PFB through its National DRFI Strategy. DJSEF was the Unit in Charge (UIC) to establish Presidential Regulation Number 75 of 2021 on Pooling Fund Bencana. According to Ministry of Finance No. 70 year 2025 on Strategic Plans of Ministry of Finance for 2025-2029, DJSEF will focus on ensuring proactive and adaptive fiscal, as well as economic policies that are inclusive, prudent, and sustainable.
- **Directorate General of Budget (DJA)** within the Ministry of Finance is responsible for ensuring the budgetary availability and authorization of PFB disbursement by reviewing and approving the proposed budget allocation or revision of the Budget Implementation List (DIPA) submitted by the requesting ministry/agency or subnational government, based on the funding recommendation issued by BNPB. DJA's role includes assessing compliance with prevailing public budgeting regulations, confirming fiscal space and expenditure classification, and formalizing the allocation within the state budget framework to enable the subsequent disbursement of funds by BPDLH through the state treasury system.
- **The Indonesian Environment Fund (BPDLH)** is assigned by the Minister of Finance to carry out the PFB management based on Presidential Regulation No. 75 of 2021 regarding PFB. Under Ministry of Finance Regulation No. 28 of 2025 on the *Management of the Disaster Pooling Fund (Dana Bersama Penanggulangan Bencana)*, *Badan Pengelola Dana Lingkungan Hidup* (BPDLH) is responsible for administrating the PFB by collecting, managing, and disbursing funds sourced from

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the national budget (APBN), local budgets (APBD), insurance proceeds, investment returns, donations, and other lawful sources, and ensuring that these funds are utilized effectively and accountably to support all phases of disaster management. The assignment refers to the Decree of the Minister of Finance No. 407 of 2021 on the Assignment of BPDLH to manage PFB which is the basis for BPDLH to carry out the management function of the funds in question in the context of PFB management.

b. **The National Disaster Management Agency (BNPB**), according to the BNPB Regulation No. 1 of 2024 on Assessment, Verification, and Evaluation of PFB Disbursement BNPB is responsible for reviewing, verifying, and evaluating proposals for disaster management activities in the pre-emergency and post-disaster stages. These responsibilities include monitoring and evaluating disaster management activities that receive funding from the PFB. The responsibility also includes the emergency response activities that can be funded by PFB in accordance with the existing On-Call Budget/*Dana Siap Pakai* mechanism.

c. **The Ministries/Agencies that provide considerations.** In addition to Ministry of Finance, Ministry of National Development Planning/National Development Planning Agency, Ministry of Home Affairs have a role to conduct review and provide considerations to the minutes of the review results and verification of proposals submitted by the National Disaster Management Agency (BNPB). The review or consideration criteria of each Ministry covers:

   a. Ministry of National Development Planning/Bappenas
      - Alignment with the RPJMN/RKP/RPJMD/RKPD
      - Readiness for fund disbursement
      - Alignment of the activity's duties and functions with the applicant's
      - No potential duplication of proposed activities from other funding sources
      - Impact and benefits of the activity on disaster risk reduction efforts

   b. Ministry of Home Affairs
      - Fulfillment of activities with the Minimum Service Standards for Disaster Sub-Affairs (SPM SUB) in accordance with Minister of Home Affairs Regulation No. 101 of 2018 concerning Basic Service Technical Standards for Minimum Service Standards for Disaster Sub-Affairs in District/City Regions.
      - Relevance of activities to disaster assessment and planning documents.

6.2. ESMS ORGANIZATIONAL STRUCTURE AT BNPB

The implementation of the ESMS for the PFB is managed by BNPB, with the ESMS function embedded within BNPB's organizational structure. To carry out its functions in review, verification,

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and evaluation of PFB disbursement, BNPB designates a PVE Team within its technical unit. The PVE team is divided into PVE team for the pre-disaster and post-disaster phases. The PVE team consists of Technical Deputy, Secretariat, PVE team for the Deputy for Systems and Strategy under Deputy for Systems and Strategy Unit, PVE team for the Deputy for Prevention under Deputy for Prevention Unit, PVE team for the Deputy for Rehabilitation and Reconstruction under Deputy of Rehabilitation and Reconstruction Unit, and PVE team for the Deputy Logistics and Equipment. These roles are assigned through an assignment decree letter from the Head of BNPB. In addition to PVE Team, ESMS implementation will also involve Inspectorate III/ULP and *Pusdiklat*. Table 6.1 provides details of the roles and responsibilities for the implementation of this ESMS.

Table 6.1 Role and Responsibilities ESMS Organizational Structure at BNPB

Roles	Responsibilities
Head of BNPB	• Determines the final outcome of the review, verification, and evaluation (PVE) of PFB-funded activities by taking into account Environmental and Social (E&S) considerations. • Issues formal recommendations to the Miniter of Finance based on the results of PVE and inter-ministerial considerations. • Accountable to monitor and evaluate the PFB ESMS implementation, including providing instruction to revise ESMS. • Request the proponent to conduct an Environmental and Social (E&S) Audit involving relevant technical experts from ministries, agencies, or other appropriate professional sources (if needed).
Secretariat	• Provides administrative and technical support for the preparation of environmental and social risk management reports related to the review, verification, and evaluation of PFB disbursement. • Maintains documentation and records of ESMS implementation
Technical Deputy	• Provides overall accountability for the integration of environmental and social risk management in PFB-related PVE activities. • Support the PVE process within their respective mandates, including the integration of environmental and social considerations into the assessment of pre-disaster and post-disaster activities financed by the PFB.
Coordinator	• Coordinates and monitors the implementation of review, verification, and evaluation activities for PFB disbursement. • Ensures that environmental and social aspects are consistently integrated into the PVE process. • Proposes field verification and monitoring assignments.

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Roles	Responsibilities
Review, Verification, and Evaluation (PVE) Team Members	• Review PFB disbursement proposals submitted by proponents from both technical and ESMS perspectives. • Verify the feasibility of proposed activities, including compliance with E&S requirements. • Conduct field verification and site reviews for activities with moderate, substantial, and high environmental and social risks. • Conduct monitoring and evaluation for activity, including review of activity implementation report and activity completion report. • Monitor the execution of the Environmental and Social Corrective Action Plan (ESCAP) to ensure that all non-compliances are resolved and that the risk of recurrence is minimized if E&S audit is performed. • Prepare and submit ESMS performance report
Inspectorate III/ULP	• Provides oversight and assurance for the implementation of the Grievance Redress Mechanism (GRM) related to PFB-funded activities. • Receives, registers, and follows up on complaints related to environmental and social impacts, compliance, and governance of PFB activities. • Coordinates with relevant units, including the PVE Team and proponents, to ensure timely investigation, resolution, documentation, and reporting of grievances in accordance with ESMS requirements.
Pusdiklat/Training Center	• Developed curriculum and training materials on PFB and the integration of ESMS. • Facilitate PFB training that includes ESMS topics.

In addition, for the emergency phase, the Technical Deputy (Deputy of Emergency) is responsible for supporting coordination and collaboration with relevant ministries and agencies in the implementation of emergency response activities within the command post structure. This role also includes ensuring that monitoring, evaluation, and reporting on emergency management activities under its authority are properly conducted, and that environmental and social (E&S) aspects are integrated into the monitoring and evaluation processes.

6.3. E&S SPECIALIST

In the Review, Verification, and Evaluation (PVE) process, BNPB may engage Environmental and Social (E&S) Specialist(s) to provide technical support and professional judgment on environmental and social aspects. E&S specialist(s) are expected to perform the following tasks:

- Provide environmental and social technical support to the PVE Team during the review, verification, and evaluation of proposals and the implementation of PFB-funded activities.

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- Review environmental and social documents submitted by proponents, including risk screening results, management plans, and environmental and social commitments.
- Assess compliance with the application of the PFB ESMS with applicable national laws and regulations and relevant environmental and social safeguard standards.
- Provide risk-based technical recommendations to the PVE Team as input for decision-making related to fund disbursement.
- Support the preparation and review of the Environmental and Social Commitment (ESC/KLS) or other relevant E&S instruments within the PVE context.
- Identify gaps, residual risks, and corrective actions related to environmental and social aspects throughout the PVE stages.
- Document the results of E&S assessments in a written and verifiable manner as part of the official outputs of the PVE process.

  Provide technical input to BNPB to support continuous improvement of PVE procedures and strengthening of PFB ESMS implementation.

The requirements for E&S specialist who will assist PVE team, as the following:

- Advanced degree (master's or equivalent) in environmental science, environmental engineering, social sciences, environmental management, occupational health and safety, sociology/anthropology, or a related field. A relevant bachelor's degree with significant experience may be considered.
- Formal training or certification in ESMS, environmental and social safeguards, E&S auditing or ISO management systems (e.g., ISO 14001, ISO 45001) is highly desirable.
- 7-10 years of professional experience in environmental and social risk management, including at least 3-5 years directly supporting its implementation, monitoring, and/or auditing, preferably in the disaster management sector or public programs.
- Experience preparing and reviewing E&S instruments, such as ESIAs, ESMPs, LARAPs, SEP, LMP, OHS plans, and biodiversity management plans and providing risk-based technical recommendations.
- Demonstrated experience applying multilateral development bank environmental and social frameworks (e.g., the World Bank ESF or other IFI standards) or equivalent national safeguards systems.
- Strong coordination and communication skills, and the ability to work adaptively under emergency conditions or time constraints.

As part of E&S monitoring and evaluation at the activity level, one or more Environmental and Social (E&S) Specialists may be engaged to undertake monitoring, evaluation, and E&S audits. The responsibilities of the E&S Specialist(s) include:

- Monitoring compliance of activities with applicable E&S requirements and agreed mitigation measures as set out in the Proponent's E&S Commitment;
- Conducting field verification to verify the implementation of E&S measures at the activity level;
- Identifying instances of non-compliance and recommending corrective and preventive actions; and
- Preparing monitoring and audit reports to support continuous improvement of E&S performance.

E&S Specialist(s) engaged for E&S monitoring and evaluation at the activity level shall possess qualifications at least equivalent to those required for E&S Specialist(s) under the PVE framework. E&S Specialist(s) with similar qualifications may be engaged for ESMS monitoring and evaluation process, including ESMS revision, if needed.

For activities classified as substantial to high E&S risk or located in sensitive areas including but not limited to physical cultural heritage sites, Indigenous Peoples' areas, conservation forests, or internationally recognized biodiversity areas, BNPB may engage additional subject-matter experts (e.g., occupational health and safety, biodiversity, Indigenous Peoples, SEA/SH, security, hazardous materials, or hazardous and toxic waste specialists) to support activity-specific monitoring, evaluation, and audits. Experts with similar qualifications may also be engaged as lead facilitators to provide technical training and strategic support in operationalizing the ESMS instruments. Required qualifications for each subject-matter expert are as follows:

Required qualifications for biodiversity specialist:

- Advanced degree (master's or equivalent) Ecology, Environmental Science, Natural Resource Management, Conservation Biology, Forestry, or related field. A relevant bachelor's degree with significant experience may be considered.
- 7-10 years of professional experience in of professional experience in biodiversity conservation, ecological restoration, or nature-based solutions, including at least 3-5 years directly supporting its implementation, monitoring, and/or auditing, preferably in the disaster management sector or public programs.
- Familiarity with Indonesian legal and institutional frameworks on Biodiversity.

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- Solid understanding of international frameworks and guidance for biodiversity and nature (e.g., TNFD, IUCN Red List, etc.).
- Experience in preparing and reviewing E&S instruments, such as ESIAs, ESMPs, and biodiversity management framework and plans as well as providing risk-based technical recommendations.
- Demonstrated experience applying multilateral development bank environmental and social frameworks (e.g., the World Bank ESF or other IFI standards) or equivalent national safeguards systems.
- Strong coordination and communication skills, reporting, and the ability to work adaptively under time constraints.
- Ability to translate technical ecological data into actionable insights for the PVE team.

Required qualifications for Indigenous Peoples specialist:

- Advanced degree (master's or equivalent) in social studies, anthropology, law, environment, or other subjects related field. A relevant bachelor's degree with significant experience may be considered.
- 7-10 years of professional experience on issues related to Indigenous Peoples and/or socioeconomic information including at least 3-5 years directly supporting its implementation, monitoring, and/or auditing, preferably in the disaster management sector or public programs.
- Experience in preparing and reviewing E&S instruments, such as ESIAs, ESMPs, and IPPF.
- Demonstrated experience and knowledge of Indigenous Peoples' rights, cultures and values and sustainable development.
- Have experience conducting outreach, engagement, or communications involving Indigenous communities.
- Have experience building and maintaining respectful relationships with Indigenous Peoples, communities, and organizations.
- Familiarity with Indonesian legal and institutional frameworks on Indigenous Peoples.
- Demonstrated experience applying multilateral development bank environmental and social frameworks (e.g., the World Bank ESF or other IFI standards) or equivalent national safeguards systems.
- Strong coordination and communication skills, reporting, and the ability to work adaptively under time constraints.

Required qualifications for Occupational Health and Safety specialist:

- Advanced degree (master's or equivalent) in occupational health, industrial safety, engineering, or related discipline. A relevant bachelor's degree with significant experience may be considered.
- Formal training or certification in OHS auditing or ISO management systems (e.g., ISO 45001) is highly desirable.
- 7-10 years of professional experience in OHS risk management, including at least 3-5 years directly supporting its implementation, monitoring, and/or auditing, preferably in the disaster management sector or public programs.
- Familiarity with Indonesian legal and institutional frameworks on OHS.
- Expertise in occupational health and safety, hazard identification and prevention, and emergency preparedness, preferably in the context of MDBs or other international EHS standards.
- Experience in working on industrial safety, OHS assessments, inspections, and audits of infrastructure projects/activities.
- Demonstrated experience with the planning, preparation and implementation of project/activity-level environmental and social assessments and related types of studies, including environmental and social management plans, C-ESMPs, HAZOP analyses, emergency preparedness plans and frameworks.
- Strong coordination and communication skills, reporting, and the ability to work adaptively under emergency conditions or time constraints.

Required qualifications for SEA/SH specialist:

- Advanced degree in social sciences, gender studies, public health, law, development studies, or related fields.
- 7-10 years of professional experience in GBV/SEA/SH prevention and response, preferably in development or humanitarian contexts, including at least 3-5 years directly supporting its implementation, monitoring, and/or auditing, preferably in the disaster management sector or public programs.
- Strong knowledge of survivor-centered approaches, referral systems, and ethical case handling.
- Familiarity with Indonesian legal and institutional frameworks on GBV/SEA/SH is an asset.
- Excellent coordination, communication, and reporting skills.

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- Demonstrated experience applying multilateral development bank environmental and social frameworks (e.g., the World Bank ESF or other IFI standards) or equivalent national safeguards systems.
- Strong coordination and communication skills, reporting, and the ability to work adaptively under emergency conditions or time constraints.

The labor management procedures for workers supporting PFB institutional operationalization is described in Chapter 12 Labor Management Procedure (LMP).

CHAPTER 7.
CAPACITY DEVELOPMENT

This chapter discusses the capacity building plans to ensure that key stakeholders for PFB have a sound understanding of ESMS implementation. The capacity building plan is an integral part of the implementation of ESMS and is implemented gradually and continuously to ensure the required SLS are met. Capacity building will be evaluated and updated annually, and to align with indicative activities and budget as described in Chapter 11.

7.1. CAPACITY BUILDING PLAN FOR BNPB

BNPB has prior experience in implementing projects that apply international E&S risk management standards. Through these engagements, BNPB has built practical familiarity with E&S risk management frameworks. In 2024-2025, PVE Team received several E&S trainings (e.g., AMDAL, introduction to World Bank Environmental and Social Framework, etc.) as part of PFB's establishment. These trainings provided a foundation for understanding E&S risks management and reinforced the priority and importance of ESMS. However, capacity needs to be further expanded and tailored for PFB.

In 2025, the BNPB Training Center (*Pusat Pendidikan dan Pelatihan Penanggulangan Penanggulangan Bencana, Pusdiklat*) developed a capacity building program on the PFB and its ESMS, designed for the PVE Team within BNPB, line ministries that provide review and advice during PVE, and the technical units within BNPB. The program includes a curriculum and teaching materials covering: (i) System, Principles, and Stages (Pre and Post-Disaster) of Disaster Management; (ii) PFB concept; (iii) ESMS that covers Concept of E&S Risk Analysis, Business Process of E&S Risk Analysis, and Procedures for E&S Management; (iv) PFB proposal preparation and the review process; (v) verification and proposal assessment; (vi) PFB disbursement; and (vii) Monitoring and Evaluation of PFB Implementation. The curriculum and teaching materials are still under development and need to be expanded to reflect the content of the full ESMS. Key topics from the full ESMS, among others, that should be added into the existing curriculum and teaching materials include:

1. **Feedback and Grievance Redress Mechanism (FGRM).** This includes the development of a classification system for complaints related to PFB implementation, integration of the mechanism into existing Standard Operating Procedures (SOPs), and operationalization

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through grievance-handling and response management training. These efforts will support effective FGRM implementation at both the national level and the activity level.

Gender and SEA/SH. Pusdiklat has developed a *Gender Mainstreaming in Disaster Management* module. Further improvement is required to integrate ESMS principles into the existing GESI module in order to ensure that ESMS implementation is carried out in a gender-responsive manner, including the prevention and management of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH).

2. **Indigenous Peoples and Cultural Heritage.** The Ministry of Culture has issued *Guidelines for Disaster-Resilient Cultural Heritage*. However, further capacity building is required to enhance understanding and practical application of these guidelines. This will be incorporated into the capacity-building materials for the PVE Team to strengthen their ability to conduct proposal screening and to carry out periodic monitoring, reporting, and evaluation.
3. **Biodiversity Management.** Pusdiklat has developed an ESMS curriculum for the PFB program. However, the current curriculum does not include specific modules on biodiversity management. Given that rehabilitation and reconstruction activities may potentially be implemented in or near conservation areas or other environmentally sensitive areas, the inclusion of biodiversity management topics in the curriculum is essential. This enhancement is necessary to equip the PVE Team with adequate knowledge on biodiversity screening and management, thereby strengthening their capacity to conduct proposal screening, monitoring, reporting, and evaluation.
4. **Supplementary Environmental and Social Impact Assessment (ESIA).** Topics related to supplementary ESIA are not currently included in the PFB related ESMS curriculum. The existing ESMS curriculum is designed primarily for activities with low to moderate risk levels, and gaps remain between national regulations and international standards in the assessment of environmental and social risks and impacts, particularly for activities with substantial and high-risk levels, which may require a supplementary ESIA. Therefore, the inclusion of supplementary ESIA topics in the current curriculum is essential. This will provide the PVE Team with a basic understanding of supplementary ESIA to support effective review, monitoring, reporting, and evaluation functions.
5. **Environmental and Social Management Plan.** The current PFB ESMS training curriculum does not provide detailed coverage of the Environmental and Social Management Plan (ESMP). The inclusion of a dedicated ESMP topic in the ESMS curriculum is therefore

necessary to ensure that the PVE Team has a clear understanding of ESMP content, implementation requirements, and specific management plan.

6. **Environmental and Social Audit.** As the current ESMS curriculum is designed for activities with low to moderate environmental and social risks, it does not cover E&S audit topics. The inclusion of E&S audit modules in the curriculum is therefore necessary to equip the PVE Team with an understanding of the E&S audit process, audit outputs, and the monitoring and follow-up of Corrective Action Plans (CAPs).

Implementation of the capacity-building plan is led by Pusdiklat, which is responsible for providing, facilitating, and coordinating all capacity building activities. To ensure high-quality delivery and alignment with E&S standards, BNPB's technical units, relevant technical ministries, relevant E&S experts (refer to Chapter 6) could be engaged as lead facilitators to provide technical training and strategic support in operationalizing the ESMS instruments. BNPB's Capacity Building Plan for ESMS Implementation is outlined in Table 7.1.

Table 7.1 BNPB Capacity Building Plan for ESMS Implementation

No.	Capacity Building Actions	Targeted Participants	Capacity Building Objective	Frequency
1	Training in ESMS PFB	PFB management, including PVE Team, BNPB pre and post technical unit, ULP	To establish a foundational understanding of ESMS principles, structures, and workflows.	Annually
2	Training in GBV and SEA/SH	PVE Team	Ensuring ESMS implementation in gender responsive manner, including GBV and SEA/SH mitigation.	Annually
3	Training in Indigenous People and Cultural Heritage	PVE Team	Enhancing the understanding indigenous people principles and handling cultural heritage.	Annually
4	Training in Biodiversity Management	PVE Team	Enhancing the understanding of biodiversity management, including screening for negative list and reviewing and evaluating aspects related to biodiversity management.	Annually
5	Training in Supplementary ESIA	PVE Team	Enhancing the understanding of supplementary ESIA, including expected contents.	Annually

No.	Capacity Building Actions	Targeted Participants	Capacity Building Objective	Frequency
6	Training in Environmental and Social Management Plan	PVE Team	Enhancing the understanding of environmental and social management plan, including specific management plans.	Annually
7	Training in Environmental and Social Audit	PVE Team	Enhancing the understanding of environmental and social audit.	Annually

7.2. CAPACITY BUILDING PLAN FOR PROSPECTIVE PROPONENTS

Prospective proponents may access the training materials prepared by Pusdiklat to improve awareness and understanding of ESMS procedures for PFB, leading to preparation of proposals that fully adhere to ESMS. BNPB will be facilitated capacity building through structured technical guidance sessions and ongoing mentoring, facilitated by the PVE Team in coordination with BNPB's relevant technical units.

In consideration of the dynamic nature of PFB implementation and the potential for regulatory shifts, the capacity building plan might be reviewed and updated periodically to ensure continuous alignment with the latest PFB regulations. Furthermore, to guarantee that all participants maintain current knowledge and competencies, refresher training sessions will be conducted periodically based on emerging needs and situational developments.

CHAPTER 8.
STAKEHOLDER ENGAGEMENT FRAMEWORK

8.1. OBJECTIVES

The Stakeholder Engagement Framework (SEF) is a key component of the ESMS in managing Environmental and Social (E&S) risks and impacts and in meeting PFB Environmental and Social standards related to stakeholder engagement and information disclosure. The SEF is required to ensure effective risk management, accountability, and coordinated efforts aligned with national policies and the needs of all affected parties throughout the PFB management and disbursement cycle. The SEF provides a clear approach for identifying stakeholders to be engaged, determining how communication will be conducted, and ensuring that stakeholder feedback and grievances are properly incorporated.

The SEF aims to ensure that E&S risk management processes in the implementation of PFB-funded activities are conducted in an inclusive, transparent, and accountable manner through meaningful and continuous stakeholder engagement, supported by effective communication, consultation, and grievance mechanisms, in accordance with national policies and the SLS 10 principles outlined in Chapter 3.

Specifically, the SEF serves as guidance for PFB Management including BNPB and MoF, as well as activity proponents to:

- Establish relationships, communication, and transparency among various stakeholders;
- Systematically identify and map relevant stakeholders, particularly all parties affected by and interested in PFB-funded activities;
- Ensure meaningful consultation processes with relevant stakeholders, including vulnerable groups; and
- Ensure the provision of timely, relevant, accessible, and understandable information.

8.2. PRINCIPLES OF STAKEHOLDER ENGAGEMENT

The SEF is designed to enable the participation of affected stakeholders as well as interested parties in effective and meaningful consultation processes. Effective and meaningful stakeholder engagement will be based on the following principles:

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- Early and continuous engagement: Stakeholder engagement applies to all PFB investments and starts as early as possible to gather initial views on activities design/proposals and continues throughout implementation and monitoring.
- Two-way dialogue: Consultation processes are conducted through two-way dialogue that encourages active and inclusive engagement with activities-affected parties to gather feedback and input from all affected and interested stakeholders, including vulnerable groups and their recognized representative organizations acting in good faith.
- Inclusivity and equity: Engagement must consider factors that may hinder participation, such as gender inequality, ethnicity, disability, and other exclusion factors affecting vulnerable groups. Consultation approaches should therefore be tailored to stakeholder needs.
- Transparent information disclosure: Consultation processes are based on prior disclosure and dissemination of relevant, transparent, objective, accessible, and understandable information. Disclosure methods and media must be adapted to stakeholder issues, needs, and access, particularly for vulnerable groups.
- Freedom from coercion: Consultations must be free from manipulation, interference, coercion, and/or intimidation. Consultation design should create a safe and enabling environment for meaningful participation, considering language, media, timing, location, and participant composition to ensure stakeholders can express their views without repercussions.
- Documentation: Records of stakeholder engagement must be documented and disclosed as part of E&S management. Documentation includes a description of consulted stakeholders, a summary of consultation feedback, and an explanation of how such feedback was considered or why it was not incorporated.

8.3. STAKEHOLDER ENGAGEMENT IN ESMS IMPLEMENTATION

This section outlines stakeholder engagement guidance within the ESMS, covering Stakeholder Engagement Mechanisms, and the preparation of Stakeholder Engagement Plans (SEP).

This section outlines stakeholder engagement guidance within the ESMS, covering Stakeholder Engagement Mechanisms, and the preparation of Stakeholder Engagement Plans (SEP).

8.3.1. Stakeholder Engagement Mechanisms

Stakeholder engagement mechanisms are implemented in alignment with E&S assessment and management processes described in Chapter 4 and Chapter 5, ESMS Governance in Chapter 6,

as well as form as part of E&S management instruments, commensurate with identified risks and impacts.

At the PFB management level, BNPB and MoF are committed to conducting stakeholder engagement and information disclosure, guided by stakeholder engagement principles in section 8.2. A stakeholder engagement plan[33] was developed prior to the PFB establishment to identify affected and interested parties and outline strategies for effective information disclosure and meaningful consultation, which can be updated, adopted, and implemented throughout the PFB implementation. For the implementation stage, key approaches for stakeholder engagement include ensuring grievance redress mechanisms are accessible and accountable, inclusive ESMS capacity-building for affected stakeholders and evaluating PFB and ESMS implementation by reviewing stakeholder engagement and grievance mechanism outcomes throughout all phases of PFB implementation.

During pre-disaster and post-disaster activity proposal submissions, stakeholder engagement is included as a proposal requirement through the Screening Checklist, E&S Safeguard Form, Proponent E&S Commitment, supplementary ESIA, and Environmental and Social Management Plan (ESMP). The E&S Safeguard Form must include stakeholder identification and analysis, as well as consultation needs and plans. Subsequently, proponents are required to describe the preparation and implementation of stakeholder engagement and grievance mechanisms in the Proponent E&S commitment and related instruments and report on their implementation through activity completion report[34].

In emergency disaster response contexts, stakeholder engagement is conducted in accordance with Indonesia's national disaster management framework, which emphasizes rapid and coordinated stakeholder engagement. Stakeholder engagement and grievance mechanisms during emergencies are integrated into BNPB operational procedures and command systems.

During emergency disaster response, stakeholder engagement focuses on rapid coordination and engagement to ensure timely disclosure of information on safety, evacuation, access to assistance, and service availability. For emergency response activities, existing regulations have identified the affected and involved stakeholders, established communication and coordination systems, and protocols for managing refugees and supporting vulnerable groups, including

[33] https://fiskal.kemenkeu.go.id/files/lain-lain/file/Stakeholder-Engagement-Plan-updated.pdf
[34] E&S implementation will be submitted as part of periodic activity report as per BNPB Regulation No. 1 of 2025 on Guidance of Implementation Review, Verification, and Evaluation of PFB Disbursement for Disaster Management in Post-Disaster Phase and BNPB Regulation No. 4 of 2025 on Guidance of Implementation Review, Verification, and Evaluation of PFB Disbursement for Disaster Management in Pre-Disaster Phase

displaced persons, women, and persons with disabilities. Grievance mechanisms during emergencies also use the BNPB system, which is established at emergency response posts and temporary shelters to receive and address grievances and feedback.

8.3.2. Preparation of Stakeholder Engagement Plans

During activity preparation, stakeholder engagement may focus on public consultations and feedback mechanisms to integrate stakeholder input into proposal preparation. The Stakeholder Engagement Plan (SEP) shall be developed as a part of E&S safeguard form or part of ESMP, based on the level of E&S risk and impact and implemented from the start of activities, with periodic updates. Generally, the SEP includes stakeholder identification and analysis, engagement strategies, resources and responsibilities, and grievance mechanisms. In preparing the SEP, the proponent can refer to Annex 14.

- **Stakeholder Identification and Analysis**

Proponents must identify all relevant stakeholders, including directly and indirectly affected parties and other interested stakeholders such as government agencies, civil society organizations, implementing partners, and other relevant groups.

Stakeholder analysis is required to assess levels of interest and influence to determine appropriate engagement approaches, particularly for stakeholders with low influence but high exposure to impacts. Needs-based analysis is also required, especially for vulnerable groups such as women, persons with disabilities, and Indigenous Peoples.

- **Communication and Consultation Approaches**

Engagement shall follow the principles outlined in section 8.2, with a focus on removing participation barriers for vulnerable groups. Methods may include:

- Regular coordination meetings (in-person or virtual);
- Public consultations, workshops, seminars, and focus group discussions (FGDs);
- Surveys and questionnaires;
- Interviews and individual consultations;
- Thematic forums;
- Informal consultations (phone calls, WhatsApp groups);
- Public information disclosure through print, online media, and notice boards; and
- Accessible grievance and feedback mechanisms; and
- Public outreach through local media, community radio, and social media.

In addition to general engagement approaches, affirmative measures may be applied to facilitate the meaningful participation of vulnerable groups. Such measures may include proactive outreach, tailored or separate consultation forums based on the preferences of vulnerable groups or individuals, and engagement with representative organizations. These measures are particularly relevant for engaging affected parties in remote and disaster-prone areas, including Indigenous Peoples with limited access to information. Participation of women and persons with disabilities may be supported through targeted engagement, accessible consultation formats, and the provision of appropriate support measures.

- **Information Disclosure**

SEPs must include plans for information disclosure using accessible languages and formats appropriate to cultural contexts and vulnerable group needs, ensuring stakeholders understand activity risks, impacts, and engagement opportunities.

- **Grievance and Feedback Mechanisms**

Proponents must establish and implement Feedback and Grievance Redress Mechanisms (FGRM), including multiple channels, documented records, transparent procedures, defined timelines, governance structures, and appeal and mediation processes. Further details are provided in Chapter 9.

- **Monitoring and Reporting**

SEPs must include monitoring and reporting measures, with periodic reporting integrated into E&S commitment monitoring. Reports should summarize a summary of stakeholder engagement activities conducted, data on grievances and feedback received and the follow-up actions taken during activity implementation, documentation of stakeholder engagement processes, and any follow-up actions or corrective measures required to improve SEP implementation. Specific mechanisms for reporting back monitoring and reporting results to stakeholders, including the methods of disclosure and timelines or reporting frequency, shall also be specified. The SEP may be updated on an ongoing basis throughout activity implementation.

- **Resources and Responsibilities**

Implementation of the SEP requires adequate budgetary resources and an organizational structure to support stakeholder engagement activities. Accordingly, the SEP shall provide information on the entities or parties responsible for implementing all stakeholder engagement activities, as well as the arrangements in place to carry out the SEP. This information shall include

the methods for documenting all stakeholder engagement activities and an estimate of the budget required for both the preparation and full implementation of the SEP.

Mainstreaming Social, Gender, and Disability in Stakeholder Engagement

Proponents shall ensure that vulnerable groups, including women, persons with disabilities, indigenous peoples, and other marginalized communities, have equal and meaningful participation at every stage of PFB-funded activities. This is achieved by mainstreaming a social, gender, and disability-inclusive approach into all consultations and decision-making processes, ensuring equitable and responsive engagement to diverse needs.

Key measures include:

- Identifying and engaging affected vulnerable groups, considering their unique identities and needs for meaningful consultation.
- Collecting and using disaggregated data (such as based on gender-, age-, disability-, and other vulnerability) to inform activity design and monitoring.
- Providing information in accessible formats (such as in local languages and disability-friendly formats).
- Applying inclusive consultation methods, such as separate meetings based on gender or age, as necessary.
- Providing safe and accessible grievance mechanisms for affected communities.
- Allocating resources and budgets to support inclusive engagement measures.
- Ensuring the team is trained in gender perspectives and receives ongoing capacity building related to social, gender, and disability inclusion.

CHAPTER 9.
GRIEVANCE REDRESS MECHANISM

The Feedback and Grievance Redress Mechanism (FGRM) is required to ensure that all feedback and grievances related to the implementation of PFB management and PFB funded activities are addressed in a timely, transparent, inclusive, and accountable manner. This chapter provides a detailed explanation of the applicable FGRM in this ESMS, including its objectives and scope, guiding principles, grievance-handling procedures and workflows, responsible units, and monitoring arrangements.

9.1. OBJECTIVES AND SCOPE

The objectives of implementing the FGRM are to:

- Provide an effective mechanism for handling grievances and feedback related to the management and disbursement of PFB, including E&S risk and impact management;
- Facilitate the receipt, evaluation, and resolution of grievances from affected and interested parties related to PFB management and disbursement;
- Ensure that the grievance redress mechanism is coordinated and follows clear procedures;
- Protect the rights of both complainants and reported parties throughout the grievance handling process;
- Serve as a channel for public and stakeholder monitoring to improve quality and prevent misuse of PFB management and disbursement;
- Enhance public trust in the PFB program and the Government's disaster management efforts; and
- Promote accountable governance free from corruption, collusion, bribery, and nepotism.

The scope of the PFB FGRM covers mechanisms for reporting and addressing grievances and feedback submitted by individuals, community groups, and/or relevant stakeholders throughout the entire lifecycle of PFB-funded activities as well as PFB disbursement and management.

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9.2. PRINCIPLES OF THE FEEDBACK & GRIEVANCE REDRESS MECHANISM

The following principles underpin the development and implementation of the FGRM:

- Legal certainty: FGRM prioritizes compliance with applicable laws and regulations;
- Objectivity: Feedback and grievances are assessed based on verifiable evidence and facts, using established criteria;
- Cooperation: FGRM is conducted through good cooperation and compliance with applicable mechanisms, procedures, and administrative requirements;
- Accessibility: The mechanism ensures ease of access for all parties, including vulnerable groups, to submit grievances and feedback;
- Non-discrimination: All complainants are treated equally regardless of ethnicity, religion, race, gender, or other subjective considerations;
- Confidentiality: Feedback and grievance are handled with due regard to confidentiality and security. Complainant identities shall not be disclosed unless consent is provided for verification and further investigation;
- Effectiveness and efficiency: All grievances are addressed promptly, appropriately, comprehensively, and in a well-coordinated manner;
- Accountability: Implementation of the grievance mechanism is fully accountable and compliant with applicable regulations;
- Transparency: The mechanism provides transparent processes allowing stakeholders to monitor grievance handling progress and outcomes; and
- Gender-responsive approach: Grievance handling upholds protection and gender responsiveness, with special capacity and procedures for addressing Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) grievances using a survivor-centered approach.

9.3. CHANNELS FOR SUBMITTING FEEDBACK & GRIEVANCES

Feedback and grievance channels for PFB-funded activities will be available at both the national and activity levels (proponent). National-level channels enable BNPB to collect feedback and improve PFB implementation, while activity-level channels enable timely responses to local grievances that require immediate action.

At the national level, the FGRM is led by BNPB, in accordance with applicable regulations[27], supported by MoF for PFB disbursement-related grievances. At the activity level, for pre and post disaster, each proponent is required to establish and apply the FGRM as part of the E&S

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commitment, which forms part of the activity proposal assessment criteria. In emergency situations, FGRM will be established at the disaster management command post following BNPB protocols for the emergency phase. The GRM in an emergency situation will be implemented to support rapid response while ensuring complaints are addressed fairly and in coordination with relevant institutions when grievances fall outside BNPB's mandate.

9.3.1. National-Level Feedback and Grievance Channels

BNPB Regulation No. 5 of 2025 on Public Grievance Redress through the Grievance Service Unit establishes multiple channels accessible to stakeholders, including for PFB-funded activities. At BNPB, feedback and grievances can be submitted directly or indirectly through the following channels:

- In-person: BNPB Grievance Service Unit, Graha BNPB
  Jl. Pramuka No.38 RT.11/RW.5, Utan Kayu Utara, Kecamatan Matraman, Kota Jakarta Timur, DKI Jakarta 13120
- Web-based application: https://dumas.bnpb.go.id/
- Email: inspektorat_utama@bnpb.go.id cc: pengaduan.bnpb@gmail.com
- Postal mail: Inspectorate General of BNPB c.q. Inspectorate III
  9th Floor, Graha BNPB, Jl. Pramuka No.38 RT.11/RW.5, Utan Kayu Utara, Kecamatan Matraman, Kota Jakarta Timur, DKI Jakarta 13120
- Telephone hotline: +62-21-29827793 ext. 8906/8907
- WhatsApp: +62 813-9998-8949
- Social Media: Instagram @bnpb_indonesia[35], X @BNPB_Indonesia[36], Facebook @InfoBencanaBNPB[37]

In the context of emergency response, BNPB also provides an alternative grievance redress channel operated by the Disaster Management Operations Control Center (PUSDALOP).

PUSDALOP grievance channels:

- Website: https://simampu.bnpb.go.id/
- Social Media: Instagram @pusdalop_bnpb[38]
- Whatsapp: +62 812-1237-575

[35] https://www.instagram.com/bnpb_indonesia/
[36] https://x.com/BNPB_Indonesia
[37] https://web.facebook.com/InfoBencanaBNPB?_rdc=1&_rdr#
[38] https://www.instagram.com/pusdalops_bnpb/

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Where grievances submitted at BNPB channels are not addressed satisfactorily, complainants may submit objections through the same channels and may also re-submit complaints related to the PFB management and disbursement to the grievance channels of BPDLH:

- In-person Complaint and/or Postal mail: Badan Pengelola Dana Lingkungan Hidup
  Gedung JB Tower Lantai 29-30, Jl. Kebon Sirih No. 48-50, Gambir,
  DKI Jakarta 10110
- Website: Hai DJPB (https://hai.kemenkeu.go.id)
- Email: pengaduan@bpdlh.id
- Telephone, text, and/or Whatsapp hotline: 081180001414

and/ or through the Ministry of Finance through the WISE complaint platform (https://www.wise.kemenkeu.go.id), via email to pengaduan.itjen@kemenkeu.go.id.

All feedback and grievances may be submitted through all of the above channels anonymously or under a pseudonym by entering a dash (-) in the identity field.

The feedback and grievance channels above will be disseminated in accordance with institutional policies that may allow disclosure through circular letters to relevant work units, technical guidance and capacity-building activities, and communication and information materials published on official websites and social media platforms. These efforts are intended to enhance awareness, ensure a common understanding of the GRM procedures, and promote consistent and accessible use of the GRM among stakeholders.

9.3.2. Activity-Level Feedback and Grievance Channels

At the activity level, each proponent must provide feedback and grievance channels for affected communities and other stakeholders. Multiple channels must be established to accommodate different access needs, particularly vulnerable groups. These arrangements must be included in activity proposals and maintained throughout implementation in accordance with E&S commitments.

Activity-level channels may adopt national-level channels. The following are examples of feedback and grievance channels that may be adopted at the activity level:

- On-site or office-based units: Communities may submit grievances, or feedback directly at the activity site or at the proponent's offices.
- Complaint and suggestion boxes: The boxes can be placed at activity sites or at the proponent’s offices to facilitate the submission of written feedback and grievances.

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- Telephone, text, or WhatsApp hotlines: Telephone numbers or WhatsApp contacts for submitting feedback and grievances.
- Dedicated websites or email addresses: Websites and/or email addresses of the proponent, or through dedicated activity-specific websites and email addresses.
- Social media platforms: The proponent's social media or activity-specific platforms can be used to disclose activity-related information and to facilitate grievance submission.
- Targeted outreach or dedicated forums: Feedback and grievance forms can be prepared, distributed, and completed during outreach activities, discussion forums, or other stakeholder engagement activities.

Feedback and grievances channels, capacity, and procedures must be considered for SEA/SH-related complaints. Information on the channels must be widely disseminated to ensure accessibility for all stakeholders.

In the context of emergency response, BNPB regulation requires the establishment of a grievances handling center within the Disaster Management Command Post at disaster sites. The public relations and internal reporting division within the Command Post is responsible for establishing complaint mechanisms and tools and for managing and responding to feedback and grievances in emergency situations.

In any disaster management phase, if individuals are dissatisfied with the response or resolution at the activity level, they may resubmit their grievances through the national channels above. They may also submit appeals as an alternative course of action. These alternative channels ensure that grievances at the activity level can be reviewed at the national level when necessary, and that stakeholder concerns are resolved fairly and accountably.

9.4. PROCEDURES FOR HANDLING FEEDBACK AND GRIEVANCES

At national level, BNPB feedback and grievances redress procedures will be implemented[39], which may also guide activity-level mechanisms, include:

1. Registration: The Grievance Service Unit/ ULP (*Unit Layanan Pengaduan)* Team records the grievances in accordance with applicable procedures and promptly communicates or sends the complaint registration number to the complainant.

[39] BNPB Implementation Guidelines No. 5 of 2025 on the Handling of Public Complaints through the Complaint Service Unit.

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2. Review: Grievances are classified by ULP team (whether the grievance is classified as an oversight-related complaint[40] or a non-oversight-related grievances[41]), analyzed, and assessed against applicable regulations.[42]
3. Referral: Grievances are forwarded to the selected authority or unit.
    - Public complaints that fall outside BNPB's duties and authority will be forwarded to the relevant institutions in accordance with their respective mandates and functions.
    - Oversight-related public complaints will be referred to BNPB's Inspectorate III.
    - Non-oversight-related public complaints may be referred to the relevant institutions concerned.
4. Follow-up: Includes clarification, confirmation, investigation, and examination by selected authority or unit.
    a. Oversight-related complaints: resolved within 20 working days
    b. Non-oversight complaints: resolved within 15 working days.

    Written justification is required if timelines are exceeded.
5. Reporting: ULP Team prepares grievance redress report in a systematic, concise, clear, and accountable manner. The grievance redress report is submitted periodically to the Inspector General of BNPB. For grievances that fall outside BNPB's authority, follow-up reports are conveyed to the relevant institutions every six months or as needed. Updates on the grievance redress progress are also reported to the Head of BNPB semi-annually.
6. Archiving: ULP Team document the outcomes of grievance handling using available facilities and infrastructure, while ensuring the security and proper storage of records in accordance with BNPB's applicable archiving and records management regulations.

BNPB guarantees legal protection[43] and fair treatment for both complainants and reported parties throughout the process.

BPDLH and MoF grievance channels will also record feedback and grievances in accordance with their applicable procedures. The Inspectorate General of the MoF will screen and review all PFB-related information received through WISE and will subsequently notify and forward it to the

[40] Oversight-related complaints are public complaints that contain information or indications of misconduct or abuse of authority by state officials, which may result in harm or losses to the public and/or the state during public administration. Such complaints may include, but are not limited to, violations of employee codes of ethics, breaches of disciplinary rules, conflicts of interest, and criminal offenses.
[41] Non-oversight-related grievances are public grievances that contain information in the form of suggestions, constructive criticism, or other inputs that are beneficial for improving the conduct of public administration and the delivery of public services.
[42] BNPB will develop more detailed categorization for PFB-related grievances as a guideline for the ULP team.
[43] BNPB Regulation No. 5 of 2025 on Public Complaint Handling through the Complaint Service Unit

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relevant party, such as BPDLH. BPDLH will conduct a comprehensive review of the complaints and provide appropriate responses through the BPDLH Grievance System.

At the activity level, proponents shall establish grievance-handling procedures similar to those that meet community needs for timely and secure responses. Activity-level grievance-handling procedures may be developed by adopting existing grievance mechanisms or by establishing new ones. In addition to the standards established by BNPB, proponents may also refer to the standardized grievance handling framework under the national government GRM system, such as SP4N–LAPOR! administered by the Ministry of Administrative and Bureaucratic Reform.

Procedures for a Safe and Confidential Grievance Mechanism for Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH).

Grievance mechanisms for SEA/SH cases in disaster management activities shall be designed and operated in line with survivor-centred, safe, and accountable principles, ensuring respect for survivors' autonomy, dignity, and decision-making, while protecting personal data and sensitive information. The mechanism shall prevent re-traumatization, stigma, retaliation, or further harm, and remain accessible and inclusive through multiple, free-of-charge, gender-responsive channels. All SEA/SH grievances shall be accepted without discrimination and handled promptly within established timeframes to ensure transparent and ethical accountability. The GRM procedures for SEA/SH cases in disaster management shall refer to national regulations[44] that include:

- SEA/SH Grievances Receipt: SEA/SH grievances are received through multiple, safe, and accessible channels. All complainants are treated with dignity, empathy, and a non-judgmental approach, without seeking unnecessary or intrusive information. Initial response and follow-up shall occur immediately and no later than 24 hours after receipt.
- Confidential Documentation: Information related to SEA/SH complaints is documented strictly on a need-to-know basis, with the survivor's informed consent, and stored in secure systems. Documentation is limited to what is necessary for referral and follow-up and is completed within 24 hours of receipt of the complaint.
- Survivor-Centred Risk Assessment: A rapid and confidential assessment is conducted to identify immediate safety risks and urgent medical, psychosocial, or protection needs. Survivor-consented protective measures and referrals are initiated as required. Assessments are completed within 24 hours for high-risk cases and within 1–3 days for other cases.
- Case Management and Safeguards: SEA/SH cases are managed in accordance with institutional mandates and survivor-centred principles, and all forms of retaliation against

[44] Law No. 12 of 2022 on Criminal Acts of Sexual Violence, Regulation of the Minister of PPPA No. 2 of 2022 on Standards for Protection Services for Women and Children Victims of Violence.

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complainants, survivors, or witnesses are prohibited. Case follow-up is typically completed within 7–14 days, subject to survivor preference and case complexity.

- Referral and Inter-Agency Coordination: Coordination with authorized service providers or relevant institutions is undertaken only when necessary and with the survivor's informed consent.
- Feedback, Closure, and Timelines: Survivors are provided with safe and appropriate updates on the progress of their case. Case closure occurs upon completion of agreed actions or at the survivor's request. The SEA/SH grievance process is concluded within 30 working days unless the survivor requests an extension.
- Data Use, Monitoring, and Prevention: SEA/SH case data are anonymized and aggregated for monitoring, learning, accountability, and prevention purposes. No personally identifiable information is included in internal or external reporting.

Regarding PFB management and PFB-funded activities, affected parties may submit SEA/SH grievances through one or more of the following channels, based on their preference and safety considerations:

a. BNPB Grievance Channel: SEA/SH grievances related to PFB and ESMS may be submitted through BNPB's official grievance mechanism as above. In strengthening their GRM system to respond to SEA/SH cases, BNPB will develop proper identification and categorization of SEA/SH-related complaints and include capacity building for the ULP team to apply specific SEA/SH handling procedures in accordance with the above principles and procedures.
b. BPDLH Channels for SEA/SH grievances related to PFB management activities:
    - In-person Complaint and/or Postal mail: Environmental Fund Management Agency c.q. Gender-Based Violence Reviewer - JB Tower Building Floors 29-30, Jl. Betel Garden No. 48-50, Gambir, DKI Jakarta 10110
    - Website: Hai DJPB (https://hai.kemenkeu.go.id)
    - Email: complaint.kbg@bpdlh.id
    - Telephone, text, and/or Whatsapp hotline: 081190005656
c. National SEA/SH and GBV Service Channels, including:
    - P2TP2A (Integrated Service Center for the Children and Women Empowerment) office in each district;
    - SAPA 129 of the Ministry of Women's Empowerment and Child Protection (hotline 129/ whatsapp 08111129129/ or website https://laporsapa129.kemenpppa.go.id/); and
    - Other relevant authorized government or non-government service providers
d. Proponent grievance channels. As discussed above, proponents should have grievance channels for PFB funded activities which can be used to receive SEA/SH-related grievances related to their disaster management activities.

e. During emergency response, the gender-based violence sub-cluster, as part of the Refugee and Protection cluster, will also provide a complaint channel at disaster sites through child- and women-friendly posts.

GRM for SEA/SH is also part of the prevention and management of SEA/SH risk and impact for PFB-funded disaster management activities, which is further elaborated in the SEA/SH Risk and Impact Management in Annex 13.

9.5. RESOURCES AND CAPACITY FOR FEEDBACK AND GRIEVANCE MANAGEMENT

At the national level, each institution has provided resources to manage its own FGRM in accordance with its internal regulations. For example, BNPB has allocated resources for its FGRM, as well as BPDLH and MOF. Within BNPB, the FGRM resources are allocated and coordinated within the Grievance Service Unit (*Unit Layanan Pengaduan*/ULP), established by a Decree of the Head of BNPB and updated annually. The ULP Team includes a Team Lead, a Coordinator, and members. The team is responsible for receiving and reviewing grievances, collecting supporting data, assessing risks to complainants, updating complainants on grievance progress, and preparing follow-up reports for the Head of BNPB.

ULP officers are required to demonstrate a high level of commitment to public service, act responsibly and collaboratively, and maintain confidentiality of information and documents obtained in the course of handling public complaints. These competencies must be further strengthened where ULP officers are responsible for handling complaints related to SEA/SH cases. Capacity building on FGRM will be conducted on a periodic basis, as further regulated in Chapter 7.

At the activity level, each activity-level feedback and grievance channel shall be supported by sufficient budget and designated personnel responsible for receiving, recording, and responding to incoming complaints. Such personnel shall possess the appropriate capacity in line with grievance handling principles and the ability to respond to all complaints in accordance with established procedures.

9.6. FGRM MONITORING AND OVERSIGHT

At BNPB, the PVE Team and the E&S consultant/specialist, in coordination with Inspectorate III, will oversee and report on FGRM implementation specific to PFB-funded activities and ESMS.

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The Inspectorate III will assess compliance with grievance procedures, the implementation of recommendations, and the effectiveness of grievance resolution through BNPB's grievance mechanisms. Monitoring will include reviewing periodic ULP Team reports, updating grievance data based on case progress, and conducting coordination meetings with the ULP Team every six months or as needed. BPDLH and MoF will also monitor their own FGRM implementation in accordance with their protocols, focusing on PFB management and disbursement within the broader PFB monitoring and evaluation process. FGRM monitoring and evaluation results will be discussed periodically following the PFB management coordination meeting and used to inform system improvements and to be included in the ESMS evaluation, in accordance with procedures in Chapter 10.

At the activity level, proponents shall appoint individuals responsible for FGRM monitoring to ensure stakeholder grievances are addressed and documented. Monitoring results will be evaluated and reported to analyze trends, assess GRM effectiveness, and identify lessons learned or corrective actions, such as training or procedural improvements. Community participation in GRM monitoring will be encouraged through collaboration with local communities to strengthen accountability and shared ownership.

CHAPTER 10.
MONITORING AND EVALUATION OF ESMS

This chapter outlines the approach for monitoring and evaluation of ESMS which aims to ensure adequacy and/or effectiveness of ESMS implementation in managing E&S risks and impacts associated with PFB-funded activities, in line with applicable national regulations and Environmental and Social Standards/*Standar Lingkungan dan Sosial* (SLS), and to facilitate continuous improvement of ESMS.

ESMS implementation will be monitored and evaluated annually by the Review, Verification, and Evaluation Team (*Tim Penelaahan, Verifikasi, dan Evaluasi* – Tim PVE) within relevant technical units within BNPB, following BNPB's evaluation cycle. The process may involve Ministry of Finance as part of portfolio-level oversight of PFB-financed activities, as necessary, in the form of coordination meeting. Beyond annual evaluation, ad hoc assessment may be conducted to address management needs. PVE Team may engage E&S specialist/consultant to support the monitoring and evaluation of ESMS, including its reporting.

Monitoring and evaluation may include, as appropriate, field visits to sampled activities, stakeholder interviews and document analysis, or a combination of these methods. Evaluation materials may include, among others, previous monitoring and evaluation records, grievance and complaint reports, activity completion reports that include reports of implementation of environmental and social commitments by activity proponents, and national policy or regulatory changes that affect PFB implementation.

The scope of evaluation includes: (i) assessment of PFB's institutional capacity and resources to identify, assess, manage, and monitor E&S risks and impacts of PFB-financed activities; (ii) review of ESMS compliance with applicable Indonesian laws and regulations and PFB SLS; (iii) review of implementation of stakeholder engagement, grievance redress mechanisms, and labor management plan of PFB; and (iv) evaluation of capacity-building implementation and effectiveness. Detailed ESMS evaluation activities are outlined below and may be tailored to reflect issues or priorities identified during the evaluation period.

Review documentation submitted by proponents (e.g., activity implementation report and E&S audit report) and BNPB monitoring outputs (e.g., monitoring checklist for emergency response activity report) to assess proponent performance in implementing E&S instruments and

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stakeholder engagement commitments. Results may inform capacity-building approaches for potential proponents, consistent with the information described in Chapter 7.

1. Review indicative activities, as described in Chapter 2, against the latest PFB regulations to verify the effectiveness of ESMS procedures in managing anticipated E&S risks and impacts.
2. Review the legal frameworks described in Chapter 3, to confirm alignment with relevant E&S and PFB regulations.
3. Assess the adequacy of policies, procedures, and tools, as described in Chapter 4 and 5, including alignment with applicable national regulations and SLS and the practicability or usability of screening, classification, and instrument preparation. This may include strengthening ESMS to integrate a clear mechanism for identifying, assessing, and managing risks from associated facilities and reviews of proposals that were not advanced due to challenges in meeting ESMS requirements to inform the development of clearer and more user-friendly procedures.
4. Review ESMS governance structures, roles, and decision-making processes, as described in Chapter 6, to ensure consistency with the latest PFB regulatory framework, clarity of mandates, coordination mechanisms, and escalation pathways. This may include assessing coordination with Ministry of Finance and other external parties (e.g., line ministries).
5. Reviews of PFB's institutional capacity, as described in Chapter 7, including staffing levels, competencies, and training coverage; examine availability of E&S specialist or consultants and targeted capacity-building needs.
6. Reviews of the implementation of stakeholder engagement and grievance redress mechanism for PFB, as described in Chapter 8 and 9, including accessibility, responsiveness and effectiveness of resolution and feedback loops of grievance handling implementation by BNPB.
7. Reviews of the financing arrangements for ESMS implementation, as described in Chapter 11, to ensure the adequacy, sufficiency, and sustainability of funding to support the implementation and monitoring of the ESMS in accordance with the PFB regulatory framework.
8. Reviews of the Labor Management Plan as described in Chapter 12, to ensure that labor management is compliant with applicable labor regulations.

Monitoring and evaluation for the ESMS will be systematically documented as ESMS performance reports by PVE Team within BNPB technical units. The report will be integrated into PVE PFB annual report, submitted to Head of BNPB manage through established institutional

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reporting mechanisms and, where required, shared with relevant stakeholders and development partners.

Consolidated ESMS performance reports will synthesize findings from the detailed activities above and, at a minimum, summarize: (i) the relevance of ESMS procedures to applicable GoI regulations and SLS; (ii) adequacy of ESMS procedures for managing E&S risks and impacts of pre-disaster, post-disaster, and emergency activities financed or planned under PFB; (iii) adequacy and effectiveness of stakeholder engagement and grievance redress mechanism and labor management plan; and (iv) key findings from portfolio of activities (e.g., recorded incident and accident and proponent's non-compliance with approved E&S commitments), lessons learned, and actionable plans for ESMS improvement. These findings will guide management decisions and drive continuous improvement, ensuring the ESMS remain responsive to evolving E&S risks and operational needs.

If the ESMS performance report indicates a need to refine ESMS-related policies, procedures, and capacity-building programs, Head of BNPB may instruct revisions to the ESMS and request the BNPB Legal Bureau to assess its implications for relevant implementation guidelines (*juklak*) associated with the PFB ESMS. Where amendments to the *juklak* are required, Legal Bureau will coordinate with the PVE Team to process the necessary updates. The ESMS revision process may involve E&S consultants, include consultation with relevant stakeholders, and ensure dissemination of updates to ESMS documents.

CHAPTER 11.
ESMS FINANCIAL ARRANGEMENT

This chapter details the financing mechanisms and resources required for environmental and social management processes in the implementation of the PFB ESMS, including applicable financial governance principles, financing arrangements, monitoring of ESMS implementation, mobilization of experts to support BNPB, development of management information systems, site supervision, and related activities.

11.1. APPLICABLE BUDGET MANAGEMENT PRINCIPLE

Financial arrangements for financing the PFB ESMS are implemented based on the principles of state financial governance in accordance with applicable national regulations. These principles form the foundation to ensure that ESMS management financing can be accounted for both administratively and substantively. Several regulatory references below serve as general guidance for the planning, implementation, and financial reporting of the ESMS:

- Law No. 17 of 2003 on State Finance
  State finances shall be managed in accordance with general principles, including results-oriented accountability, professionalism, proportionality, transparency in state financial management, and financial audits conducted by an independent and autonomous audit body.
- Presidential Regulation No. 75 of 2021 on the Pooling Fund Management of the PFB shall adhere to the principles of prudence, transparency, accountability, timeliness, and target accuracy.

11.2. FINANCIAL MECHANISM FOR ESMS MANAGEMENT

ESMS implementation will be funded by the State Budget which may include BNPB and MOF budget and will be determined by PFB Management.

BNPB is responsible for overseeing overall PFB-funded activities, including ESMS implementation. BNPB as well as involved in monitoring, evaluation, supervision, documentation, dissemination, and capacity-building activities to strengthen ESMS implementation across all proposed activities.

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Table 11.1 Indicative ESMS Annual Budget Allocation

Budget Item	Estimation		Remarks
	Cost (USD)[45]	Timeline	
ESMS Implementation Includes: • ESMS policies and regulations synchronization • Coordination meeting with technical ministries • Regional technical guidance meetings • PVE team coordination meetings • Communication and information materials	USD 150,000/year	Annually	Specific thematic proposals will be selected per year. On review and verification stages, BNPB will be supported and assisted by consultants. Under a worst-case scenario, one proposed activity with moderate E&S risk would require approximately USD 5,733 for field verification including laboratory costs and personnel mobilization.
Capacity Building for PVE Team • ESMS training	USD 15,000/year	Annually	To strengthen the PVE Team, basic environmental and social risk management training may be conducted twice a year.
Communication Strategy and Stakeholder Engagement • Conducting public consultations • Develop and produce communication materials.	USD 10,000/year	Annually	Implementation starting in 2026 is estimated to cost USD 10,000 per year.
Grievance Redress Mechanism (GRM) includes strengthening and operationalizing the GRM, periodic reporting, and case handling (including SEA/SH cases)	USD 80,000/year	Annually	Strengthening the GRM for PFB is estimated at USD 30,000, while operationalization will require approximately USD 50,000 per year
Environmental and Social Specialists	USD 40,000/year	Annually	BNPB will recruit Environmental and Social Specialists (including Subject Matter Experts as

[45] The activities cost will follow BNPB's Specific Output Cost Standards (*Standar Biaya Keluaran Khusus*/SBKK)

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Budget Item	Estimation		Remarks
	Cost (USD)[45]	Timeline	
			necessary) with an estimated cost of USD 40,000 per year.
Monitoring and Evaluation of ESMS Implementation	USD 90,000/year	Annually	E&S monitoring and evaluation operations conducted by BNPB, with support from ministries/agencies or technical experts (as needed), will require approximately USD 90,000 for 30 proposed activities per year.

At the activity level, budgets for implementing E&S commitment must be prepared and included in submitted proposals. The amount and budget of items for implementing E&S commitments and preparing E&S management instruments for activities should be prepared based on identified E&S risks and impacts, in accordance with operational procedures.

CHAPTER 12.
LABOR MANAGEMENT PLAN (LMP)

1. Scope of Application

The Labor Management Procedure (LMP) is developed to guide the management of labor-related risks and working conditions, as well as the contractual arrangements of workers who support PFB for institutional development and operationalization.

This LMP is prepared to guide the PFB management in establishing an approach to identifying potential risks and impacts that typically result from working conditions and activities. Requisite measures in the LMP include establish key requirements pertaining to employment relationships, worker protection, and measures to manage (e.g. avoid, minimize, mitigate and monitor) potential risks and impacts related to Occupational Health and Safety (OHS).

2. Responsible Entity for LMP Implementation

BNPB will be responsible for coordinating daily implementation and supervision of the PFB LMP, including monitoring proponent compliance with occupational health and safety standards, training of workers, and ensuring that the grievance redress mechanism is established and implemented as part of monitoring, evaluation, and reporting stage.

3. Overview of Labor Use

Workers involved in PFB management will include government personnel from PFB management functions (Ministry of Finance staff) and implementing agencies (such as BNPB staff). Individual consultants and experts will be engaged as direct workers, alongside a limited number of contracted workers, to support PFB operationalization. These workers will be primarily office-based, with occasional field travel for policy dissemination, technical assistance, consultations, and monitoring activities.

Timing of Labor Requirements

The timing of labor requirements will be based on the timeline of the PFB implementation. All workers will be employed throughout the timeline, and the length of engagement with the consultant team will depend on the timing of their recruitment or assignment letter.

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Table 12.1 Indicative PFB Management Workers

PFB Management Workers	Role and Responsibilities	Estimated Number of Person	Length of Engagement
BNPB	• To provide a review, verify proposal. • To coordinate with the relevant technical ministries • To monitor and evaluate ESMS implementation. • To assist and ensure proponents integrated ESMS in the activity implementation. • To handle submitted complaint	At least consist of: • PVE Team • E&S consultants	PVE team: 2 years (the assignment is every 2 years) E&S Consultants: During PVE process.
BPDLH	• To manage PFB fund	4 persons	Follow BDLH policy
Relevant ministries focal point	• To provide strategic. consideration on proposed activity • To provide assistance with BNPB on thematic issues.	Representative of each technical ministry.	Follow relevant ministries focal point policy
Contracted workers[1]	• To perform work related to core functions of the activity	It will depend on the type of activity.	During activity implementation
Community workers if apply	To provide community labor in activity implementation	It will depend on the type of activity.	During activity implementation

4. Assessment of Key Potential Labor Risks

The LMP application will focus on the PFB management activities that include PFB disbursement to fund channeling entities. No major OHS risks are envisaged as the workers will most likely be office-based, with potential travel to the field. All government officials will operate under the

national civil servant code, while the consultant team engaged in activities will be hired in accordance with national law and procurement guidelines, under written contracts. Therefore, no vulnerable workers such as migrant workers or low-wage workers who may face discrimination, including on the basis of gender or disability, are expected to be hired. There are no physical or hazardous works for workers under the PFB establishment and operation.

There are no labor risks associated with child labor and minimum wages in this project. Workers in the PFB are expected to be over the age of 18 while the benefits and wages for the workers will follow government regulation that meets the national requirements of minimum wage for working. All government entities will recruit consultants/experts through the procurement system agreed upon between BNPB and MoF. Codes of Conduct for Sexual Exploitation Abuse and Sexual Harassment (SEA/SH) are incorporated in the LMP as a preventative measure.

5. Working Agreement

Employment

Based on the Law on Manpower (Law No. 13 of 2003), as amended by the Job Creation Law (Law No. 11 of 2020) and its implementing regulations, employers (PFB Management) must have consensual work agreements with their workers (consultants) in the form of a written contract signed by both parties. Work agreements are made for a definite period of employment or for an unspecified time. A work agreement for a definite employment period is based on the completion of a specific job, as determined by the work contract.

Termination of employment

A work agreement shall terminate upon the death of the worker, the expiry of the term of the work agreement, the completion of a specific job, or pursuant to a court decision or a final and binding decision of an industrial relations dispute settlement institution. A work agreement may also terminate as a result of specific circumstances or events as provided for in the work agreement or in accordance with applicable laws and regulations. Upon the expiration of a fixed-term work agreement, the employer is required to provide compensation to the worker in accordance with the worker's length of service, as stipulated under applicable laws and regulations. Additional requirements for work termination may apply to government employees in cases of disciplinary violations, according to the Law on Civil Servants (Law No. 5 of 2014).

In accordance with the Job Creation Law (Law No. 11 of 2020), as amended by Law No. 6 of 2023, employers, workers, trade unions, and the Government must make efforts to prevent the termination of employment. If termination is unavoidable, the employer must inform the workers

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and the labor union of the purpose and reason for the termination. If the worker or union disagrees with the termination, the settlement must be conducted through bipartite negotiations. Should the negotiations fail to reach an agreement, the matter will be processed according to the industrial dispute settlement mechanism under Law No. 2 of 2004 on Settlement of Industrial Relations Disputes.

Labor rights on freedom of association

In carrying out industrial relations, workers and labor unions have the function of carrying out work under their obligations, maintaining order for the continuity of production, democratically channeling aspirations, developing skills and expertise, and participating in advancing companies and fighting for the welfare of members and his family. On the provisions of workers' rights to organize, including rights to collective bargaining, workers have the freedom to choose how they are represented, and employers must not interfere in the process as mandated in Law No. 21 of 2000 on Labor Unions.

The labor laws also protect workers from discrimination in the workplace. This encompasses entitlements to equal treatment and equal rights and responsibilities with no discrimination based on sex, ethnicity, race, religion, skin color, and political orientation. Indonesian labor laws provide explicit protection against discrimination in the workplace, guaranteeing equal treatment, rights, and responsibilities for all workers. Discrimination on the basis of sex, ethnicity, race, religion, skin color, or political orientation is prohibited.

Occupational Safety and Health (OHS) Management

The legal framework affirms that every worker has a right to receive Occupational, Health, and Safety (OHS). Every employer is under an obligation to apply 'an occupational safety and health management system that shall be integrated into the employer's management system. Further regulations related to OHS are also regulated in Law No. 1/1970 concerning Management of Occupational Health and Safety (K3), government regulations No. 88/2019 concerning Work Safety and No. 50/2012 concerning the Implementation of the Occupational Safety and Health Management System (SMK3), Presidential Regulation No. 7/2019 concerning Occupational Diseases and other several derivative regulations from the Minister of Manpower concerning requirements for workplace safety; the Occupational Safety and Health Advisory Committee (P2K3), Occupational Health and Safety Management System (SMK3), OHS for Workers and Work Environment; Personal Protective Equipment, Diagnosis and Assessment of Disabilities

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due to Occupational Accidents and Diseases, First Aid for Accidents at Work, and the Implementation of Occupational Safety and Health Management System Audit.

Minimum Wages

Related to wages, the laws acknowledge workers' rights to earn the same wages for work of the same value. Employers are required to pay wages in accordance with the work agreement, which should not be lower than the minimum wage. Minimum wage rates are formulated by the Provincial Governor and determined based on economic and employment conditions. A governor may also determine the minimum wage in certain regencies/cities within the province by taking into account the economic growth and inflation rate of the relevant regency/city.

Working hours, overtime, leave

Regular working hours are 40 working hours per week, which can be arranged into five or six working days as regulated in a work agreement. Employers must pay overtime compensation if the working hours exceed the above with written consent from the employees for all overtime work. In this case, the Omnibus Law extends the maximum overtime hours to a maximum of four hours per day and/or 18 hours a week.

Employers are required to provide rest time and paid leave. The rest time includes rest between working hours, at least half an hour after working for 4 (four) continuous hours, and the break time does not include working hours; and weekly rest 1 (one) day for 6 (six) working days in 1 (one) week. Annual paid leave is given at least 12 (twelve) working days after the worker has continuously worked for 12 (twelve) months. In addition to the time off and leave, employers can provide long breaks as stipulated in work agreements, company regulations, or collective working agreements.

Age of Employment

Indonesia has ratified and mainstreamed the ILO Convention on Minimum Age for Admission to Employment and the ILO Convention on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor in the national laws. The national Law on Labor No.13 of 2003 stipulates that employers are not allowed to employ children under 18 years old, and any hazardous work is prohibited to any person under 18 years old. Exemption on the minimum age may be made for the employment of children aged between 13 and 15 years old for light work with certain conditions; and children between 15 and 18 years old can be employed but must not be exploited to perform the worst forms of works.

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Social Protection

Based on Law on the National Social Security and System and its amendments in Job Creation Law, employers are required to register their employees/staff and participate in social security programs, which include healthcare, pension, work accidents, old age, and death insurance. Workers who experience employment termination are entitled to job loss insurance provided by the labor social security agency and the National Government. For government employees, articles about social security and OHS for civil servants are specified in Law No. 5 of 2014 on Civil Servants.

Foreign Workers

Related to foreign workers, every employer who employs foreign workers must obtain a Foreign Manpower Utilization Plan (known as *Rencana Penggunaan Tenaga Kerja Asing* or hereafter RPTKA) approved by National Government. RPTKA is not required for a foreign worker who is, among other things, engaged by a company in the type of production activity that has stopped due to emergencies, vocational, technology-based start-ups, on a business visit, or researching for a certain period. Foreign workers can be employed in Indonesia only in a working relationship for a particular position and for a specific time and have competence according to the position to be occupied. An employer of foreign workers must appoint Indonesian workers as companions for foreign workers to transfer technology and transfer skills from foreign workers; carry out work education and training for Indonesian workers following the qualifications of positions occupied by foreign workers, and repatriate foreign workers to their home countries after their employment period ends.

Further details regarding the procedures and arrangements on the implementation and administrative sanctions are regulated in the Government Regulation no. 36 of 2021 and other derivative regulations, including ministerial regulations which will be issued following the passage of the Omnibus Law.

6. Terms and Conditions

Since MoF and BNPB will be responsible for PFB, the LMP refers to and follows terms and conditions within national labor legislation and government policies to determine wages, working hours, rest and leaves, and employment termination for all workers.

The workers will be provided with clear information and documentation pertaining to their terms and conditions of employment that will set out their rights under national labor laws and this LMP. For consultants, the recruitment process will follow the national procurement of government

goods and services standard by National Public Procurement Agencies (*Lembaga Pengadaan Barang dan Jasa Pemerintah*/LPKP). The specific wages and allowance for consultants will follow provincial minimum wages and adjusted based on MoF and BNPB's policies corresponding to qualification as set out in the ToR.

On working hours, based on the national labor law, maximum regular working hours are 40 working hours per week, which can be arranged into five or six working days. However, government officials such as MoF staff and BNPB staff are bound to follow working hours based on their internal regulations. Meanwhile, individual consultants and contracted workers are expected to follow national labor law with a maximum of 40 working hours per week.

The requirements and conditions for overtime and leave durations are agreed upon as part of individual contracts and follow national labor law. The terms and conditions of contracted workers (i.e., firm consultants delivering and/or supporting core functions of PFB) will be determined based on individual contracts mutually agreed between the MOF and third-party service provider. These terms and conditions will be in line, at a minimum, with the LMP and the national labor law, and specified in the standard contracts to be used by the consulting firm(s) under the project.

Under PFB, disputes between workers and employers should be resolved based on mutual agreement. If the settlement is not reached, the labor disputes should be solved as regulated in the labor legislation. For the government officials, in the event of disputes, person(s) concerned may file grievance(s) to grievance channels that are governed in Chapter 9. For consultants, any dispute arising out of a work agreement/contract, which cannot be amicably settled between the parties, shall be referred to an adjudication/arbitration process in accordance with the national law. In the case of a contract entered into with a foreign consultant, any dispute shall be settled by arbitration in accordance with the United Nations Commission on International Trade Law (or hereafter UNCITRAL) Arbitration Rules.

7. Additional Procedures

In addition to employment terms and conditions as established in the LMP, the following additional provisions shall also apply:

Non-discrimination and equal opportunity

Decisions relating to the employment or treatment of PFB workers will not be made based on personal characteristics unrelated to inherent job requirements. The workers employment will be based on the principle of equal opportunity and fair treatment and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring,

compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement or disciplinary practices.

PFB will identify and provide measures that support equal opportunities for women and men, including measures to prevent harassment, including sexual harassment. Relevant measures that address working conditions, accessibility of the built environment, and communication of information for workers with disabilities, such as provision of wheelchair ramps or elevators and/or alternative formats of communication shall also be identified as relevant to ensure accessibility and equality of opportunities for all workers.

Forced Labor

BNPB, MoF and all workers involved in PFB are prohibited to engage forced labor, which includes the practice of the following:

- bonded/indentured labor (working against an impossible debt).
- excessive limitations of freedom of movement.
- excessive notice periods.
- retaining the worker's identity or other government-issued documents or personal belonging.
- imposition of recruitment or employment fees payable at the commencement of employment.
- loss or delay of wages that impede the workers' right to end employment within their legal rights.
- substantial or inappropriate fine.
- physical punishment.
- use of security or other personnel to force or extract work from workers, or other restrictions that compel a worker to work in a non-voluntary basis.

Occupational Health and Safety

In line with national labor legislation, the employer and all workers must follow OHS standards. Related to that, PFB activities are committed to:

- Complying with applicable laws and regulations related to potential occupational health and safety risks and impacts.
- Maintaining healthy and safe working conditions. This also includes ensuring safety of travel activities (by air, land and/or water related travels) and protection of SEA/SH.

- Applying general safety tips for travel include:
    - Share travel itinerary with other personnel. Provide daily “check-ins” to the office/colleagues when deemed necessary.
    - Carry your personal emergency contact numbers.
    - Identify and take note the local emergency medical services and contact numbers at site.
    - Pack a basic first aid kit, including any personal prescribed and/or non-prescribed medications.
    - Avoid traveling at night unless there is no other feasible option.
    - Prioritize traveling on more reliable airlines acknowledged for their safety standards and performance.
    - Adequately assess and select options for air versus land travel. Generally, air travels have lower likelihood of an accident but higher severity when compared to land travels.
    - Identify and engage trusted third-party sources for vehicle rentals and/or boat rentals.
    - Ensure cars/vehicles are equipped with safety equipment such as seat belts (all seats), fire extinguishers etc., and is in good operating condition for land travel.
    - Driver shall not use nor talk on mobile phones while driving.
    - Avoid traveling on motorbikes whenever possible (most road accidents are related to motorbikes)
    - Ensure to wear a life vest whenever travelling on water.
- Enabling active participation in OHS risks elimination through the promotion of appropriate skills, knowledge, and attitudes towards hazards.
- Ensuring all workers are competent to do their tasks and giving them adequate training.
- Providing adequate control of health and safety risks arising from all work activities at all circumstances.
- Continually improving the OHS management system and performance.
- Communicating this policy statement to all persons working under the control of the BNPB and MoF, with emphasis on individual OHS responsibilities.
- Availing this policy statement to all parties at all sites.

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Code of Ethic and Behaviour

All government employees, both permanent civil servants and government employees with a work agreement (PPPK) are bound by the national civil servant code of ethic and behavior as stipulated in Law No. 5 of 2014 on Civil Servants and Minister of Finance Regulation No 190 of 2018 on Code of Conduct and Behavior of Civil Servants in the Area of Ministry of Finance. The same code of ethics and behavior shall be applied to contracted workers in and can be attached in the work agreement:

- Carry out duties honestly, responsibly, and with high integrity.
- Carry out duties with care and discipline.
- Serve with respect, courtesy, and without pressure.
- Carry out duties in accordance with the provisions of laws and regulations.
- Carry out duties in accordance with orders from supervisors or competent officers if they do not conflict with the provisions of laws and regulations and government ethics.
- Maintain confidentiality concerning state policies.
- Use state property and assets responsibly, effectively, and efficiently.
- To prevent conflicts of interest in carrying out their duties
- Provide true and not misleading information to other parties who need information related to official interest.
- Not misuse internal state information, duties, status, power and position to obtain or seek self-profit or benefit or for others.
- Uphold the basic values of civil servant and always maintain the reputation and integrity of civil servant.
- Implement the provisions of laws and regulations regarding the discipline of government employees.

Sexual Exploitation, Abuse, and Sexual Harassment *(SEA/SH)*

As part of OHS measures, PFB seeks to prevent any misconduct and/or practices (both verbal and physical) that constitute forms of SEA/SH. SEA/SH refers to any act that is perpetrated against a person's will and is based on gender norms and unequal power relationships. It includes physical, emotional, or psychological and sexual violence and denial of resources or access to services. Violence includes threats of violence and coercion and inflicts harm on women, girls, men, boys, and people of diverse gender identities.

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The LMP has also incorporated additional Codes of Conduct (CoC) on SEA/SH below. All workers are required to understand and sign the CoC as a part of the code of ethics and behavior prior to employment. All workers are also required to participate in regular training on SEA/SH, including CoC, to ensure that they implement the CoC requirements in their work. A key element of the CoC includes relevant sanctions applicable to workers in the event of violations. Subject to investigation of allegations, disciplinary measures may be applied as stipulated in Government Regulation No. 53 of 2010 on Discipline of Civil Servants and the national law.

8. Grievance Mechanism for PFB Workers

BNPB and MoF provide a mechanism for receiving and responding to workers' grievances. These grievances will be responded to, recorded, and followed up with appropriate actions.

Grievances from PFB workers can include, but are not limited to:

1. Contract, terms, and conditions,
2. Occupational Health and Safety (OHS),
3. Sexual Exploitation, Abuse, and Sexual Harassment (SEA/SH), and
4. Fraud.

Information on FGRM will be provided in an accessible format and included as part of communication dissemination to all workers. BNPB and MoF will ensure that measures to protect the confidentiality and safety of personnel from retaliation are in place and broadly communicated to all workers.

Grievance Redress Procedure

All employees, including consultants/experts, and other contracted workers as specified in this LMP, are encouraged to use the existing grievance mechanism channel that is explained in Chapter 9.

9. Contractor Management

BNPB and MoF may engage national firm(s) and/or service providers for the purpose of delivery of specific outputs. Firm(s) and service providers will be required to follow the national legislation requirements and measures described in the LMP. These include contractual procedures, selection criteria, terms and conditions, provisions of OHS, CoCs, and compliance protocol set forth in the LMP.

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The contractors are required to monitor the implementation of labor and working conditions as explained in this LMP. Evidence of implementation will be provided through regular reports, which should include the following information:

- Labor conditions: records of workers engaged under the activity, including contracts, registry of induction of workers, including CoC, working hours, remuneration and deductions.
- Health and Safety: provision of insurance, OHS training, recordable incidents, and corresponding analysis, etc.
- Workers: number of workers, indication of origin (expatriate, nationals), gender, age, with evidence that no child labor is involved,
- Training/induction: dates, number of trainees, and topics.
- Worker grievances: details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.

MoF and BNPB will manage and monitor contractors' performance in relation to contracted workers, focusing on contractors' compliance with their contractual agreements in line with the LMP.

10. Community Workers and Primary Supply Workers

The activities for PFB establishment and operationalization will not envisage engagement with community workers and primary suppliers for goods and services. Relevant principles pertaining to community and primary supply workers for future disaster activities financed by the PFB will follow the principle of SLS 2 in the ESMS and comply with the national laws and regulations relevant to labor issues.

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ANNEXES

Annex 1. ESMS Consultation History

Timeline	Description of Activity
Initial ESMS Stage	
30 May 2024	Focus Group Discussion (FGD) for the design of ESMS in PFB.
11 June 2024	Public consultation for the design of ESMS in PFB.
July 2024	Initial ESMS automatization
Full ESMS Stage	
28 November 2025	Stakeholder consultation (workshop/interview) with BPDLH, DJSEF, BNPB-Emergency response unit, Legal team, and Pusdatin.
5 December 2025	Stakeholder consultation was conducted to review the progress of ESMS development for Chapters 1–3 and to ensure that the content aligns with the World Bank's ESS and the PFB business processes. The consultation was attended by BNPB, BPDLH, DJSEF, the World Bank, and the ESMS consultant team.
12 December 2025	Technical discussions with relevant stakeholders are conducted to identify information needs and business processes for environmental and social management in disaster management. These discussions cover, among others, information on grievance redress mechanisms, governance and organizational arrangements, ESMS financial management, environmental and social risk and impact assessment and management, capacity development, stakeholder engagement frameworks, as well as monitoring and evaluation. The technical discussion was attended by BNPB, BPDLH, DJSEF, the World Bank, and the ESMS consultant team.
19 - 20 December 2025	Stakeholder consultation was conducted to review the progress of ESMS development for Chapters 4-7 and to ensure that the content aligns with the World Bank's ESS and the PFB business processes. The consultation was attended by BNPB, BPDLH, DJSEF, the World Bank, and the ESMS consultant team.
8-10 January 2026	Stakeholder consultation was conducted to review the progress of ESMS development for Chapters 8-11 and to ensure that the content aligns with the World Bank's ESS and the PFB business processes. The consultation was attended by BNPB, BPDLH, DJSEF, the World Bank, and the ESMS consultant team.
13 January 2026	Stakeholder consultation for the preparation of the ESMS roadmap covers an introduction, an overview of the PFB design and activities, ESMS development, and the implementation of the PFB ESMS roadmap. The consultation was attended by BNPB, BPDLH, DJSEF, the World Bank, and the ESMS consultant team.

Timeline	Description of Activity
15 January 2026	Technical discussions with relevant stakeholders are conducted to provide an overview of and to finalize revisions based on inputs from previous discussions on Chapters 4–11, as well as on the instruments and procedures contained in the ESMS document. The discussion was attended by BNPB, BPDLH, the World Bank, and the ESMS consultant team.
23 January 2026	Stakeholder consultation with ministry and national agencies including NGO to gain input regarding ESMS document. The consultation was attended by 19 ministries and 3 NGO. Participants emphasized the need for an ESMS that is operational, inclusive, and proportionate, taking into account variations in proponents' capacities as well as the complexity of environmental and social risks. The feedback primarily highlighted the need to strengthen social dimensions, gender considerations, and the protection of vulnerable groups; to clarify institutional roles and responsibilities; to ensure consistency in the use of language and terminology; and to underscore the importance of outreach and capacity building across Ministries/Agencies (K/L) and local governments.
26 January 2026	Stakeholder consultation with subnational governments was conducted online with around 25 subnational agencies attended. It can be concluded that the implementation of the ESMS is still relatively new and therefore requires broader outreach and dissemination to stakeholders, particularly at the subnational level. In practice, a certain degree of flexibility is needed to ensure that ESMS requirements can be applied effectively without hindering rapid response during emergency conditions on the ground. In addition, active facilitation by local governments is an important factor in supporting community groups in preparing activity proposals that adequately meet ESMS requirements.

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Annex 2a. List of Pre-Disaster Activities Under PFB

No	Category	Indicative Program/Activity
Planning and Policy Formulation		
1	Planning	Preparation of disaster risk assessment
2		Preparation of disaster management plan
3		Preparation of contingency plan
4		Preparation of emergency response plan
5		Preparation of logistics and equipment needs assessment
6		Preparation of other planning documents regarding disaster management
7	Policy formulation	Formulation of government regulations regarding disaster management
8		Formulation of presidential regulations regarding disaster management
9		Formulation of ministerial/agency head regulations regarding disaster management
10		Formulation of regional head regulations regarding disaster management
11		Preparation of norms, standards, procedures, and criteria (NSPK) in disaster management
12		Preparation of academic papers for disaster management policy
13		Research and development in the disaster management
14		Assistance, monitoring, and evaluation of the implementation of minimum service standards (SPM) in disaster sub-affairs
15		Preparation of the Indonesian national work competency standards for disaster management
16		Preparation of Indonesian national standards in the disaster management
17		Development and enhancement of information systems in the disaster management
18		Monitoring, control, evaluation, and reporting of disaster management performance
Prevention		
19	Mitigation	Disaster awareness outreach for government officials and/or communities
20		Implementation of disaster culture awareness activities
21		Development of a public sector disaster-resilient
22		Establishment and development of disaster-resilient administrative areas
23		Establishment and development of disaster-resilient communities
24		Establishment and development of disaster-resilient zones
25		Nature-based disaster mitigation solutions
26		Construction/strengthening of disaster resilience support infrastructure
27		Enhancement of water body capacity
28		Arrangement of buildings and/or environments in disaster-prone areas
29		Relocation of communities and/or buildings in disaster-prone areas
28	Preparedness	Establishment/strengthening of disaster risk reduction forums
29		Establishment/strengthening of disaster management clusters
30		Preparation of disaster evacuation maps/layouts
31		Provision and installation of evacuation signs and public information boards
32		Provision of disaster preparedness facilities and infrastructure
33		Provision of disaster protection and preparedness equipment
34		Construction/strengthening of evacuation shelters

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No	Category	Indicative Program/Activity
35		Construction/strengthening of evacuation routes
36	Early Warning	Development of risk communication and disaster early warning systems
37		Strengthening community response to disaster early warning
38		Utilization of technological innovation to enhance the capacity of early warning systems
39		Implementation of disaster early warning instrumentation
40		Construction/strengthening of threat monitoring posts
41		Construction/strengthening of disaster operations control center infrastructure
Logistic & Equipment		
42	Logistic & Equipment	Fulfillment of logistics and equipment needs for preparedness
43		Distribution of logistics and disaster management equipment
44		Provision of rescue and evacuation facilities and infrastructure, and development of rescue and evacuation routes
45		Construction/strengthening of warehousing facilities
Capacity and Professional Development		
46	Training	Disaster management technical training
49	Technical Training	Disaster management technical guidance
50		Disaster management technical assistance
51	Competency	Competency/professional certification for disaster management practitioners
53	Drills	Disaster management simulation/drills

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Annex 2b. List of Emergency Response Activities Under PFB

No	Category	Indicative Program/Activity
1	Search, victim evacuation and affected communities	Organizing evacuation routes
2		Providing facilities and accommodation
3		Search operations for disaster victims
4		Identification of mass casualties
5		Funeral assistance for heirs of deceased victims
6		Disability compensation for victims with permanent physical/mental impairment
7	Emergency relief/aid	Rapid disaster assessment
8		Procurement or rental of materials, equipment, and supplies
9		Establishing assembly points and emergency medical area
10		Mobilization/demobilization of emergency equipment
11		The return of disaster-affected victims / displaced persons to their homes
12		Provision of transport, firefighting equipment, aerial photography, monitoring, and integrated information systems
13	Provision of clean water and sanitation services	Provision of clean water
14		Provision of sanitation and hygiene facilities
15	Food services/provision	Procurement and distribution of food
16		Preparation of equipment, supplies, and the operation of public/community kitchens
17		Procurement of kitchen equipment for disaster-affected victims
18	Clothing services/provision.	Clothing services, including the procurement and distribution of clothing
19	Health services	Procurement and distribution of health equipment and materials
20		Procurement of medical supplies, pharmaceutical products, and health equipment
21		Medical services, including outpatient and inpatient costs
22		Operational costs of field emergency hospitals
23		Operations for disease surveillance and vector control
24		Limited isolation and quarantine, including building rental
25		Payment of death compensation for health workers and disaster victims

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No	Category	Indicative Program/Activity
26		Provision/procurement of emergency or specialized hospitals
27		Provision of lodging/rest facilities for health workers carrying out emergency duties
28		Provision of land, air, and sea evacuation infrastructure and facilities.
29		Financing of health services for Indonesian citizens returning from abroad who are affected by disasters
30	Education services	Education services, including school supplies and emergency school infrastructure and facilities
31	Protection of vulnerable groups, people with disabilities, and other groups with special needs	Activities related to the protection of vulnerable groups, persons with disabilities, and other groups with special needs
32	Strengthening/repair/restoration of vital infrastructure and facilities, and structural mitigation	Strengthening, repair, or restoration of vital infrastructure and facilities, as well as structural mitigation, may be carried out on an emergency, semi-permanent, or permanent basis, based on recommendations and technical assessments from the relevant technical agencies or the authorized Ministries/Institutions
33	Preparation and activation of the early warning system	Activities for the preparation and activation of the Early Warning System (EWS) during an emergency status that cannot be delayed
34	Provision of (temporary) housing	Housing provision includes land clearing or land preparation, preparation of buildings/structures, building rental, procurement and installation of tents, supporting housing facilities, relocation and Temporary Housing Allowance (DTH), as well as stimulant funds for repairing the houses of disaster victims (during the transition from emergency to recovery)
35	Empowerment of disaster-affected community groups	Assistance for small- and medium-scale production tools/machinery Cash for Work (Labor-Intensive Cash Assistance); and Maintenance of livestock and plant seedlings.
36	Scope of activities in conditions where disaster risks have extensive impacts.	Other activities related to emergency conditions or extensive risk impacts, including activities associated with risk analysis, emergency conditions, special situations, or activities that involve risks with extensive impacts, as well as the preparation and readiness of emergency response resources, including personnel, equipment, facilities, and emergency information systems.

Annex 2c. List of Post-Disaster Activities Under PFB

No	Sub-Category	Indicative Program/Activity
Housing Sector		
1	Repair and reconstruction of damaged houses	
2	Relocation of disaster-affected houses	
3	Provision of household assistance for severely damaged houses	
4	Repair and reconstruction of facilities and infrastructure	
5	Technical assistance for construction or repair of damaged houses	
Infrastructure Sector		
6	Repair or construction of roads and/or bridges	
7	Repair or construction of retaining walls	
8	Repair or construction of terminals	
9	Repair or construction of ports/piers	
10	Repair or construction of basic sanitation and environmental facilities and infrastructure	
11	Repair or construction of dams, weirs, sabo/dams, and reservoirs	
12	Repair or construction of irrigation networks	
13	Repair or construction of drainage networks	
14	Repair or construction of infiltration wells	
15	Repair or construction of raw water supply networks	
Economic Sector		
Agriculture Sub-Sector		
16	Empowerment of agricultural community groups affected by disasters	Technical assistance for agricultural community groups
17		Provision of tools and stimulus materials for agricultural community groups
18		Capacity strengthening of agricultural community groups
19		Preparation of sustainability plans for agricultural community groups
20	Construction and/or repair of agricultural facilities and infrastructure buildings	
Plantation Sub-Sector		
21	Empowerment of plantation community groups affected by disasters	Technical assistance for plantation community groups
22		Provision of tools and stimulus materials for plantation community groups
23		Capacity strengthening of plantation community groups
24		Preparation of sustainability plans for plantation community groups

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No	Sub-Category	Indicative Program/Activity
25	Construction and/or repair of plantation facilities and infrastructure buildings	
Livestock Sub-Sector		
26	Empowerment of livestock community groups affected by disasters	Technical Assistance for livestock community groups
27		Provision of tools and stimulus materials for livestock community groups
28		Capacity strengthening of livestock community groups
29		Preparation of sustainability plans for livestock community groups
30	Construction or improvement of buildings and infrastructure for animal housing, warehouses, and feed storage	
Fisheries Sub-Sector		
31	Empowerment of fisheries community groups affected by disasters	Technical assistance for fisheries community groups
32		Provision of tools and stimulus materials for fisheries community groups
33		Capacity strengthening of fisheries community groups
34		Preparation of sustainability plans for fisheries community group
35	Construction and/or repair of fisheries facilities and infrastructure buildings	
Tourism Sub-Sector		
36	Technical Assistance for Tourism Community Groups	Technical assistance for tourism community groups
37		Provision of tools and stimulus materials for small and medium tourism community groups
38		Capacity strengthening of small and medium tourism community groups
39		Preparation of sustainability plans for small and medium tourism community groups
40	Construction and/or repair of buildings, facilities, and infrastructure for tourist attractions	
Cooperatives and Micro, Small, and Medium Enterprises (MSMEs) Sub-Sector		
41	Empowerment of cooperative and MSME community groups affected by disasters	Technical assistance for cooperative and MSME community groups
42		Provision of tools and stimulus materials for cooperative and MSME community groups
43		Capacity strengthening of cooperative and MSME community groups
44		Preparation of sustainability plans for cooperative and MSMS community groups
45	Construction or repair of market facilities and infrastructure, including shop houses, stalls, kiosks, and ticket counters	

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No	Sub-Category	Indicative Program/Activity
46	Construction or repair of buildings, facilities, and infrastructure for small-scale industries (factories, household-scale units, warehouses, and administrative buildings)	
47	Marketing support for community groups affected by disasters	
Social Sector		
Health Sub-Sector		
48	Reconstruction or repair of buildings, facilities, and infrastructure for health services	
49	Empowerment of community groups for integrated health post (*posyandu*) services	Technical assistance for community groups providing *posyandu* services
50		Provision of tools and stimulus materials for community groups providing *posyandu* services
51		Capacity strengthening of health workers and community groups providing *posyandu* services
52		Preparation of sustainability plans for community groups providing *posyandu* services
53	Empowerment of community groups under the family welfare development program (PKK)	Technical assistance for community groups under the family welfare development program (PKK)
54		Provision of tools and stimulus materials for community groups under the PKK program
55		Capacity strengthening of community groups under the PKK program
56		Preparation of sustainability plans for community groups under the PKK program
Education Sub-Sector		
57	Construction or repair of buildings, facilities, and infrastructure for education services	
58	Empowerment of community groups providing supplementary education for children at the levels of early childhood (PAUD), primary (SD), junior secondary (SMP), and senior secondary (SMA)	Technical assistance for community groups providing supplementary education
59		Provision of tools and stimulus materials for community groups providing supplementary education for children at the levels of early childhood (PAUD), primary (SD), junior secondary (SMP), and senior secondary (SMA)
60		Capacity Strengthening of educators, education personnel, and community groups providing supplementary education for children at the levels of early childhood (PAUD), primary (SD), junior secondary (SMP), and senior secondary (SMA)
61		Preparation of sustainability plans for community groups providing supplementary education for children at the levels of early childhood (PAUD), primary (SD), junior secondary (SMP), and senior secondary (SMA)

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No	Sub-Category	Indicative Program/Activity
62	Empowerment of community groups providing religious education for children	Technical assistance for community groups providing religious education for children
63		Provision of tools and stimulus materials for community groups providing religious education for children
64		Capacity strengthening of community groups providing religious education for children
65		Preparation of sustainability plans for community groups providing religious education for children
Religious Affairs Sub-Sector		
66	Construction or repair of buildings, facilities, and infrastructure for worship services	
67	Empowerment of Community Groups for Religious Activities	Technical assistance for community groups engaged in religious activities
68		Provision of tools and stimulus materials for community groups engaged in religious activities (*Majelis Taklim*, Church Assemblies)
69		Capacity strengthening of religious leaders and community groups engaged in religious activities
70		Preparation of sustainability plans for community groups engaged in religious activities
Cultural Affairs Sub-Sector		
71	Construction or repair of buildings, facilities, and infrastructure for cultural heritage sites or historic buildings	
72	Empowerment of community groups in arts and culture	Technical assistance for community groups in arts and culture
73		Provision of tools and stimulus materials for community groups in arts and culture
74		Capacity strengthening of community groups in arts and culture
75		Preparation of sustainability plans for community groups in arts and culture
Social Institutions Sub-Sector		
76	Provision of psychosocial support in post-disaster contexts (clusters: children, adolescents, adults, elderly)	
77	Empowerment of community social institution groups	Technical assistance for community groups of social institutions
78		Provision of tools and stimulus materials for community groups of social institutions
79		Capacity strengthening of community groups of social institutions
80		Preparation of sustainability plans for community groups of social institutions

No	Sub-Category	Indicative Program/Activity
81	Empowerment of sports community groups	Technical assistance for sports community groups
82		Provision of tools and stimulus materials for sports community groups
83		Capacity strengthening of sports community groups
84		Preparation of sustainability plans for sports community groups
85	Empowerment of community youth organization groups (Karang Taruna)	Technical assistance for community youth organization groups (*karang taruna*)
86		Provision of tools and stimulus materials for community youth organization groups (Karang Taruna)
87		Capacity strengthening of community youth organization groups (Karang Taruna)
88		Preparation of sustainability plans for community youth organization groups (Karang Taruna)
Cross-Sectoral		
89	Reconstruction or repair of buildings, facilities, and infrastructure assets owned by ministries/agencies	
90	Reconstruction or repair of buildings, facilities, and infrastructure assets of offices owned by local government	
91	Community empowerment in forest and land rehabilitation through land and vegetation management	Provision of tools and stimulus materials for community groups in forest and land rehabilitation through land and vegetation management, such as terracing and tree planting
92		Capacity strengthening of community groups in forest and land rehabilitation through land and vegetation management, such as terracing and tree planting
93		Preparation of sustainability plans for community groups in forest and land rehabilitation through land and vegetation management, such as terracing and tree planting
94	Community Empowerment in Coastal Area Rehabilitation through Vegetation and Coral Reefs	Provision of tools and stimulus materials for community groups in coastal areas
95		Capacity strengthening of community groups in coastal areas
96		Preparation of sustainability plans for community groups in coastal areas
97	Rehabilitation of river basins and watershed areas through vegetation	
98	Community empowerment in waste management, including solid and liquid wastes	Provision of tools and stimulus materials for community groups in solid and liquid waste management
99		Capacity strengthening of community groups in solid and liquid waste management

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No	Sub-Category	Indicative Program/Activity
100		Preparation of sustainability plans for community groups in solid and liquid waste management
101	Community Empowerment in the Management of Wetlands and Drylands (Good Agricultural Practices)	Provision of tools and stimulus materials for community groups in wetland and dryland management (Good Agricultural Practices)
102		Capacity strengthening of community groups in wetland and dryland management (Good Agricultural Practices)
103		Preparation of sustainability plans for community groups in wetland and dryland management (Good Agricultural Practices)

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Annex 3a. PFB Environmental and Social Standard Gap Mitigation for Pre-Disaster & Post-Disaster Phases

Tabel Annex 3.a. PFB *Standar Lingkungan dan Sosial* (SLS) Gap Mitigation for Pre-Disaster & Post-Disaster Phases

Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
SLS 1: Assessment and Management of Environmental and Social Risks and Impacts			
Regulations: ● Law No. 32 of 2009 regarding Environmental Management and Security. ● Law No. 6 of 2023 regarding Job Creation. ● Government Regulation No. 22 of 2021 regarding the Implementation of Environmental Protection and Management. ● Government Regulation No. 5 of 2021 regarding the Implementation of Risk-Based Business Licensing. ● Regulation of the Minister of Environment and Forestry No. 4 of 2021 regarding the List of Types of Businesses and/or Activities That Must Have an EIA. ● BNPB Regulation No. 1 of 2024 Review, Verification, and Evaluation of the Disbursement of the PFB for Disaster Management.	Law No. 32 of 2009 and its implementing regulations provide a comprehensive legal framework for environmental assessment, management, and monitoring of activity-related impacts. The regulatory system establishes environmental instruments such as SPPL, UKL-UPL, and AMDAL to identify, manage, and monitor E&S risks and impacts from business and/or activities. For PFB context, BNPB Implementation Guidelines No. 2 of 2025 introduce ESMS requirements for pre-disaster phase PFB financing, which describes the business processes and procedures of environmental and social management systems including the assessment, management, and monitoring of environmental and	Existing regulations provide fragmented guidance on the assessment and management of environmental and social risks and impacts, particularly in relation to vulnerable groups, indigenous people, and cultural heritage, and biodiversity. The regulatory system does not require assessment of associated facilities. For the PFB context, the implementation guidelines do not yet have regulations that regulate environmental and social management for post-disaster, such as the fulfillment of environmental and social requirements in post-disaster activities.	To address the identified gaps, the ESMS PFB establishes a structured framework across all PFB-funded activities. The ESMS covers environmental and social risk and impact screening and introduce additional instruments to assess, manage, and monitor risks and impacts related to, among others, indigenous people, vulnerable groups, and biodiversity (e.g., supplementary ESIA, ESMP, BMF, IPPF). Assessment of associated facilities has not been introduced at this stage of the ESMS and will be considered as the system is further institutionalized. The

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Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
Guidelines: ● BNPB Implementation Guidelines No. 1 of 2025 regarding Guidelines for the Implementation of Review, Verification, and Evaluation of the Distribution of PFB for Post-Disaster Management. ● BNPB Implementation Guidelines No. 2 of 2025 regarding Environmental and Social Management Systems for the Disbursement of PFB Funds for Pre-Disaster Phase.	social risks and impacts as stated in SLS 1. This guideline reinforces the application of E&S risk management across the PFB lifecycle. Meanwhile, BNPB Regulation No. 1 of 2024 and BNPB Implementation Guidelines No. 1 of 2025 have required each proponent to assess, manage, and monitor E&S risks and impacts through preparation and implementation of E&S Commitment as part of activity proposal. BNPB will verify and assess the proposals and monitor the implementation of activity.		detailed explanation will be conveyed at the relevant SLS.
SLS 2: Labor and Working Conditions			
Regulations: ● Law No. 1 of 1970 regarding Occupational Safety. ● Law No. 13 of 2003 regarding Manpower. ● Law No. 6 of 2023 regarding Job Creation. ● Law No. 3 of 1992 regarding Employment Social Security. ● Law No. 24 of 2011 regarding National Social Security (BPJS), with the latest	Indonesia's labor laws are aligned with all ILO core conventions that guarantee the rights and protection of workers, including occupational health and safety guarantees, the right to unionize, the elimination of forced labor, the minimum age of workers and the protection of children from the exploitation of child labor, as well as the right to	National regulations provide a general framework for managing labor and occupational health and safety (OHS) aspects that is broadly consistent with the objectives of SLS 2. However, gaps have been identified, including the absence of explicit mechanisms for workers' grievance management and	The Labor Management Plan (LMP) for PFB, as part of this ESMS, will provide detailed arrangements for different categories of PFB workers, including direct workers and contracted workers. The LMP will also include policies and procedures on non-

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Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
amendment in Law No. 11 of 2020 concerning Job Creation. ● Law No. 12 of 2022 regarding the Crime of Sexual Violence. ● Law No. 21 of 2000 regarding Trade Unions/Trade Unions. ● Law No. 18 of 1956 regarding the Ratification of ILO Convention No. 98 on the Right to Organize and Bargain Together. ● Law No. 19 of 1999 regarding the Ratification of ILO Convention No. 105 on the Elimination of Forced Labor. ● Law No. 80 of 1957 regarding the Ratification of the Convention of the International Labor Organization No. 100 concerning Equal Wages for Male and Female Workers for Work of Equal Value. ● Law No. 21 of 1999 regarding the Ratification of ILO Convention No. 111 concerning Discrimination in Employment and Position. ● Law No. 2 of 1999 regarding the Ratification of ILO Convention No. 138 on the Minimum Age for Employment. ● Law No. 35 of 2014 regarding Amendments to Law No. 23 of 2002 concerning Child Protection. ● Government Regulation No. 88 of 2019 regarding Occupational Health.	equal wages and freedom from discrimination. The legislation also establishes provisions related to workers' rights including employment agreements, working hours, leave, minimum wage, employment relations, health insurance and occupational accident insurance, and the protection of workers from discrimination and violence in the workplace. The OHS-related regulations describe arrangements to conduct activities in a safe and healthy manner, to implement OHS management system, and guidelines for personal protective equipment as well as guidelines for the prevention and handling of sexual violence in the workplace. In addition, Regulation of the Minister of Public Works and Public Housing No. 10 of 2021 on the Construction Safety Management System establishes a framework for managing construction safety through the contractor's	limited regulatory provisions addressing the prevention and response to sexual exploitation and abuse and sexual harassment (SEA/SH). In addition, existing OHS regulations are mostly non-prescriptive, which requires institutions to develop and implement institution specific OHS arrangements to ensure full alignment with SLS 2 requirements.	discrimination and equal opportunity, prohibition of forced labor, occupational health and safety (OHS), codes of ethics and conduct and response to SEA/SH. In addition, the Grievance Redress Mechanism set out in Chapter 9 will be applied to address workers' complaints. The ESCOPs under this ESMS include provisions on occupational health and safety (OHS) requirements that can be used as guidance by proponents.

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Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
● Government Regulation No. 50 of 2012 regarding the Implementation of the Occupational Safety and Health Management System (SMK3). ● Regulation of the Minister of Manpower No. 1 of 1980 regarding Occupational Safety and Health Management (OHS) in the Construction Sector. ● Regulation of the Minister of Manpower No. 5 of 2018 regarding OHS Standards for Workers and the Workplace Environment. ● Regulation of the Minister of Manpower No. 8 of 2010 regarding Personal Protective Equipment. ● Regulation of the Minister of Manpower No. 15 of 2008 concerning First Aid ● Regulation of the Minister of Public Works and Public Housing No. 10 of 2021 regarding Guidelines for Construction Safety Management System. ● Decree of the Minister of Manpower No. 88 of 2023 regarding Guidelines for the Prevention and Handling of Sexual Violence in the Workplace. ● Regulation of the Head of BNPB No. 14 of 2014 regarding the Handling, Protection, and Participation of Persons with Disabilities in Disaster Management.	Occupational Health and Safety (OHS) management system. BNPB Regulation No.5 of 2021, as further amended by BNPB Regulation No. 5 of 2022, stipulates that non-government personnel and volunteers are entitled to be registered under the *Jaminan Sosial Ketenagakerjaan* (social security) program. This program provides coverage for occupational accidents and death benefits for non-occupational accidents. Ministry of Women's Empowerment and Child Protection Regulation No. 8 of 2024 and National Disaster Management Agency Regulation No. 13 of 2014 require the protection of women, children, and vulnerable groups from gender-based violence, including sexual violence (SEA/SH), throughout all phases of disaster management, while ensuring an integrated gender approach to ensure equitable access, participation, and benefits for all. Furthermore, national OHS regulations require the protection of workers from all workplace hazards,		

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Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
● Regulation of the Head of BNPB No. 10 of 2020 regarding Technical Guidelines for Disaster Management. ● BNPB Regulation No. 5 of 2021 regarding Social Security for Workers in the Field of Disaster Management. ● Minister of Women's Empowerment and Child Protection Regulation No. 8 of 2024 concerning the Protection of Women and Children from Gender- based Violence in Disaster Management. ● Regulation of the Head of BNPB No. 13 of 2014 concerning Gender Mainstreaming in Disaster Management.	including sexual harassment and violence, in accordance with applicable labor regulations.		
SLS 3: Resource Efficiency and Pollution Prevention and Management			
Regulations: ● Law No. 32 of 2009 regarding Environmental Management and Security. ● Law No. 18 of 2008 regarding Waste Management. ● Law No. 30 of 2007 regarding Energy ● Law No. 17 of 2019 regarding Water Resources ● Government Regulation No. 22 of 2021 concerning the Implementation of Environmental Protection and Management.	National regulations are relatively comprehensive and provide standards for air quality and emissions, hazardous and non-hazardous waste management, wastewater quality, energy efficiency, and pesticide registration. They also regulate the management of debris, e-waste, and hazardous materials and waste arising from pre- and post-disaster activities—including sorting, transportation, temporary storage,	While the national regulatory framework provides a foundation for pollution prevention and waste management, certain aspects require further alignment with SLS 3, particularly in disaster-related contexts. National regulations do not explicitly and uniformly address the prohibition and handling of specific B3, such asbestos, across pre- and post-disaster	A negative list in the ESMS for specific materials, such as those containing asbestos material. This prohibition applies to new construction. Any activity, including associated facility, to be renovated or demolished containing asbestos must also be disposed of using the asbestos management

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Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
● Government Regulation No. 81 of 2012 regarding Waste Management and Household Waste. ● Government Regulation No. 33 of 2023 regarding Energy Conservation. ● Government Regulation No. 30 of 2024 concerning Water Resources Management ● Government Regulation No. 27 of 2020 regarding Specific Waste Management. ● Government Regulation No. 74 of 2001 regarding the Management of Hazardous and Toxic Materials. ● Regulation of the Minister of Environment No. 74 of 2019 regarding the Emergency Program for the Management of Hazardous and Toxic Materials and/or Hazardous and Toxic Waste. ● Regulation of the Minister of Environment and Forestry No. 1 of 2024 regarding Handling Waste Arising from Disasters. ● Regulation of the Minister of Environment No. 11 of 2025 regarding Wastewater Quality Standards and Wastewater Treatment Technology Standards for Domestic Wastewater. ● Regulation of the Minister of Environment No. 19 of 2021 regarding Procedures for Non-B3 Waste Management.	and final processing—thereby providing a foundational basis for the application of SLS 3 in PFB-supported activities. While electronic waste (e-waste) is not explicitly defined as a separate waste category under Indonesian regulations, it is generally regulated as hazardous and toxic waste (*Limba*h B3). Under Law No. 32 of 2009 and Government Regulation No. 22 of 2021, as further elaborated through Government Regulation No. 27 of 2020 and Minister of Environment and Forestry (MoEF) Regulation No. 1 of 2024, MoEF Regulation No. 9 of 2024, MoEF Regulation No. 6 of 2021, and Regulation of the Minister of Health No. 2 of 2023, Indonesia has established comprehensive end-to-end controls for Hazardous and Medical Waste and E-waste Management. These controls cover waste stream inventories as the basis for planning and oversight; waste segregation and labelling; technical standards for safe storage (including	construction, renovation, or demolition activities. Likewise, pesticide management in agricultural and plantation subsector activities needs to be added.	protocol as part of ESCOPs. In addition, the ESMS will incorporate protocols for pesticide management in disaster-related contexts, including measures for safe storage, handling, spill response, and disposal. These protocols will be integrated into the Environmental and Social Codes of Practices (ESCOPs) guidelines. Risk & Hazard Assessment will be provided as part of ESMS, referring to the Regulation of the Minister of Environment and Forestry no. 74 of 2019 and World Bank ESS 4 Guidance Note.

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Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
● Regulation of the Minister of Environment No. 6 of 2021 regarding Procedures and Management of B3 Waste. ● Regulation of the Minister of Environment No. 9 of 2024 regarding Waste Management Containing Hazardous and Toxic Materials (B3) and Waste (*Limbah* B3). ● Regulation of the Minister of Health Number 2 of 2023 concerning Implementation Regulation of Government Regulation Number 66 of 2014 concerning Environmental Health ● Regulation of the Minister of Agriculture No. 43 of 2019 regarding Pesticide Registration. ● Regulation of the Head of BNPB No. 11 of 2008 concerning Guidelines for Post-Disaster Rehabilitation and Reconstruction	impermeable surfaces, secondary containment, and appropriate signage); licensed transportation supported by a manifest system; treatment and disposal restricted to licensed facilities; requirements for personnel training and the use of personal protective equipment (PPE); emergency spill response; and systematic reporting and record-keeping to ensure traceability and chain of custody throughout the hazardous waste management lifecycle. In addition, Regulation of the Head of BNPB No. 11 of 2008 stipulates that rehabilitation and reconstruction materials and physical activities must be environmentally friendly and contribute to minimizing carbon and other greenhouse gas emissions. With regard to SLS 3, water and energy efficiency measures are aligned with Indonesia's regulatory framework, including Law No. 17 of 2019, Law No. 30 of 2007, Government Regulation No. 30 of 2024, and Government Regulation		

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Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
	No. 33 of 2023, which collectively promote the efficient and sustainable use of natural resources.		
SLS 4: Community Health and Safety			
Regulations: ● Law No. 32 of 2009 regarding Environmental Management and Security. ● Law No. 22 of 2009 regarding Road Traffic. ● Law No. 12 of 2022 regarding the Crime of Sexual Violence. ● Government Regulation No. 32 of 2011 regarding Management and Engineering, Impact Analysis, and Traffic Demand Management. ● Government Regulation No. 74 of 2001 regarding the Management of Hazardous and Toxic Materials. ● Regulation of the Minister of Health No. 2 of 2023 regarding Government Regulation No. 6 of 2014 concerning Environmental Health. ● Regulation of the Head of BNPB No. 3 of 2016 concerning Disaster Logistics Management Guidelines.	Pre-disaster activities, including the installation of disaster signage and information boards, are regulated to ensure community safety by requiring consideration of site-specific conditions such as location characteristics, soil type, and land slope. BNPB Regulation No. 2 of 2024 on the Disaster Early Warning System establishes clear technical and safety standards for the design and construction of disaster signage. During the rehabilitation and reconstruction phase, which predominantly involves construction activities, community health and safety aspects are addressed through the mandatory environmental assessment instruments (AMDAL or UKL–UPL). These instruments require the identification and management of potential risks to surrounding	Although national regulations establish a robust framework for construction safety and OHS, they do not explicitly prescribe detailed requirements for community-facing risks such as road safety and traffic management during rehabilitation and reconstruction activities as well as related to community emergency response. However, this gap is considered manageable, as construction safety risks are generally addressed through contractor OHS management systems, site-specific risk assessments, and coordination with local authorities. Regarding public health and safety in the pre-disaster and post-disaster phases,	The ESMS will further mitigate this gap by integrating community health and safety considerations into the ESCOPs, which will serve as practical guidance for proponents. For disaster management, risk mitigation related to SEA/SH is necessary to anticipate and reduce the impacts. It also requires support from trained disaster management managers. There should be a complaint handling system related to SEA/SH. If the risk to SEA/SH is high, experts can be recruited specifically to handle SEA/SH case/risk. Furthermore, a code of

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Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
	communities arising from construction activities, including those related to access, mobility, and interaction with public areas. Through the Disaster Management Law, the TPKS Law, the Ministry of Women's Empowerment and Child Protection (KPPPA) regulations, and the Head of the National Disaster Management Agency (BNPB) Regulation on gender mainstreaming, the government and all disaster management implementers are required to implement pre-disaster prevention measures, provide a safe environment and confidential complaint mechanisms during emergency response, and ensure a just, safe, and inclusive recovery without violence, discrimination, or exploitation. Indonesian national policies and regulations mandate the protection of the public—especially women, children, and vulnerable groups—from gender-based violence, including sexual and sexual violence (SEA/SH), and ensure public safety and health throughout all stages of disaster management.	prevention of SEA/SH risks must be implemented consistently throughout the disaster cycle to anticipate potential SEA/SH risks.	ethics related to SEA/SH and SEA/SH risk management (Annex 13) is implemented to address this risk.

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Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
SLS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement			
Regulations: ● Law No. 2 of 2012 regarding Land Acquisition for Development in the Public Interest. ● Government Regulation No. 19 of 2021 regarding the Implementation of Land Acquisition for Development in the Public Interest. ● Presidential Regulation No. 62 of 2018 regarding the Management of Social Impacts of Land Acquisition for National Development. ● Presidential Regulation No. 71 of 2012 regarding the Implementation of Land Acquisition for Development in the Public Interest. **Guidelines:** ● BNPB Implementation Guidelines No. 3 Year 2023 on Temporary Housing Assistance for Disaster Victims.	The provisions of SLS 5 are generally aligned with national regulations. Regulations on land acquisition for development in the public interest already include protections for the rights of affected communities, including vulnerable groups and Indigenous Peoples. Existing regulations require the government to provide compensation for the loss of physical and non-physical assets, as well as comfort assistance for emotional impacts experienced by affected communities. In addition, national regulations also require compensation and assistance for people who do not have formal rights to land but have occupied it, as long as they meet the set criteria. The land acquisition process also requires a socio-economic survey, social and environmental impact assessment, and consultation with affected communities before the location is determined. Information disclosure	National regulations currently provide compensation and assistance to land users without formal land rights only if they meet specific criteria and have not yet addressed livelihood restoration or transitional development support for all affected parties. This is especially critical for informal or non-legal land users who fall outside the eligibility criteria under national regulations. Livelihood restoration efforts also remain limited, as support is predominantly provided in the form of one-time compensation without long-term planning to safeguard the social and economic sustainability of affected communities.	This ESMS includes a Land Due Diligence Guideline to ensure a clean and clear land status of the proposed activities that includes land ownership and tenure verification, ensuring absence of land disputes and encumbrances, ensure there are no involuntary resettlements, confirm mitigation measure procedures are completed if land clearance involves displacement, including for those already occupying land informally. The Land Due Diligence, as part of the proposal, will include appropriate measures, in accordance with the land due diligence guidelines, to ensure that land used in or affected by the proposed activities complies with national regulations and SLS 5.

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Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
	is guaranteed through the obligation of public announcement regarding the results of the inventory and the amount of compensation.		
SLS 6: Biodiversity Conservation and Sustainable Management of Living Natural			
Regulations: ● Law No. 32 of 2009 concerning Environmental Protection and Management. ● Law No. 32 of 2024 Amendments to Law No. 5 of 1990 concerning the Conservation of Biological Natural Resources and Their Ecosystems. ● Government Regulation No. 28 of 2011 concerning the Management of Nature Reserve Areas (KSA) and Nature Conservation Areas (KPA). ● Regulation of the Minister of Environment No. 29 of 2009 concerning Guidelines for Biodiversity Conservation in the Regions. ● Minister of Environment and Forestry Regulation No. 106 of 2018 concerning Protected Plant and Animal Species. **Guideline** ● Regulation of the Head of BNPB No. 11 of 2008 regarding Guidelines for Post-	A number of regulations have comprehensively regulated biodiversity and ecosystems, including the designation and regulations of utilization for conservation areas and the protection of protected species. In line with SLS 6, national regulations already include biodiversity conservation planning at the regional level as well as supervision and monitoring of sustainable conservation implementation. On the enforcement side, the applicable regulations have strengthened the protection of the area through clear sanctions against illegal activities, such as illegal logging, illegal timber trade, and forgery of permits, which threaten the sustainability of the ecosystem.	National regulations do not specifically mention the identification and protection of natural habitats and critical habitats. In addition, there are instances where national protected species listings diverge from IUCN classifications for endangered and critically endangered species. The rules for the protection of species and habitats outside formal conservation areas are still limited. Furthermore, specific requirements to anticipate and manage invasive species, as emphasized under SLS 6, are not yet clearly regulated.	This ESMS includes tools for screening, assessment, management, and monitoring of biodiversity, including through introduction of negative list, E&S screening form, and biodiversity management framework. The biodiversity management framework also provides a reference for the list of potential natural habitats and critical habitats, including in the Alliance for Zero Extinction (AZE), in addition to the conservation areas designated by Government of Indonesia.

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Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
Disaster Rehabilitation and Reconstruction.	Regulation of the Head of BNPB No. 11 of 2008 stipulates that rehabilitation and reconstruction activities undertaken during the post-disaster phase must consider environmental sustainability and avoid damage to existing ecosystems.		Management of invasive species will be added in ESCOPs.
SLS 7: Indigenous Peoples			
Regulations: ● Law No. 24 of 2007 concerning Disaster Management. ● Law No. 41 of 1999 regarding Forestry. ● Law No. 32 of 2009 regarding Environmental Management and Protection. ● Law No. 39 of 2014 regarding Plantations. ● Law No. 6 of 2014 regarding Village Government. ● Law No. 1 of 2014 regarding Amendments to Law No. 27/2007 concerning the Management of Coastal Areas and Small Islands. ● Government Regulation No. 21 of 2008 concerning the Implementation of Disaster Management.	Indigenous Peoples in national regulations refer to Customary Communities that defines as Indonesian Citizens who possess distinctive characteristics, live communally in accordance with their customary law, maintain strong ties to ancestral origins and/or shared residences, have a deep attachment with their land and the environment, and uphold a value system that governs economic, political, social, cultural, and legal institutions and utilizes a specific ancestral territory. Existing regulations also provide guidelines on the recognition and protection of Customary Communities, including procedures	No significant regulatory gaps were identified in IP definition, as characteristics of Customary Communities align with the four criteria for IP under international standards. When applicable, compliance with SLS 7 can be strengthened by introducing tailored assessments through activity-level IP Plans, and formal recognition and specific measures for managing impacts on IPs, such as obtaining Free, Prior and Informed Consent/ PADIATAPA.	This ESMS includes the Indigenous Peoples Planning Framework (IPPF) to guide the screening, consultations, engagement, and management of impacts on IPs/ Customary Communities if they are present and/or will be affected by the activities. This framework also includes guidelines on the IPs Impact Assessment and the IPs Plan.

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Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
● Presidential Regulation No. 186 of 2014 regarding Social Empowerment of Remote Indigenous Communities. ● Regulation of the Minister of Home Affairs No. 52 of 2014 regarding Guidelines for the Recognition and Protection of Customary Law Communities.	for identification, verification, and official determination by the government, guidance and supervision, dispute resolution and their participation in development through participatory consultation. In addition, BNPB regulations on disaster management also recognize cultural and local wisdom as one of the essential considerations when designing and implementing disaster management activities.		
SLS 8: Cultural Heritage			
Regulations: ● Law No. 5 of 1992 regarding Cultural Property. ● Law No. 11 of 2010 regarding Cultural Preservation. ● Law No. 5 of 2017 regarding Cultural Development. ● Law No. 17 of 2004 regarding the Ratification of the Kyoto Protocol to the United Nations Framework Convention on Climate Change. ● Presidential Regulation No. 78 of 2007 regarding the Ratification of the	Indonesia's regulatory framework provides a solid basis for protecting cultural heritage in line with SLS 8. Laws No. 5/1992, 11/2010, and 5/2017 establish mechanisms to safeguard both tangible and intangible heritage. International commitments, including the Kyoto Protocol and the Convention for the Safeguarding of Intangible Cultural Heritage (Presidential Regulation No. 78/2007), further strengthen protection.	No significant regulatory gaps have been identified. The existing operational guidelines are considered sufficient and appropriate to support the implementation of SLS 8 for PFB funded activities.	This ESMS includes a Chance Find Procedure to conduct risk screening & mapping for project areas including cultural heritage inventories into disaster preparedness and recovery to ensure effective implementation, compliance, and continuous improvement

Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
Convention for the Protection of Intangible Cultural Heritage. ● Regulation of the Minister of Home Affairs No. 52 of 2014 regarding Guidelines for the Recognition and Protection of Customary Law Communities. ● Regulation of The Ministry of Environment and Forestry No. 70 of 2017 regarding Procedures for the Implementation of Reducing Emissions from Deforestation and Forest Degradation (REDD+), The Role of Conservation, Sustainable Forest Management, and the Enhancement of Forest Carbon Stocks. ● Guidelines for Disaster-Resilient Cultural Heritage (Ministry of Education, Culture, Research and Technology, 2023).	Technical and institutional guidelines, such as Ministerial Regulation of Environment and Forestry No. 70/2017, reinforce protection by promoting sustainable forest conservation, which often overlaps with traditional cultural and sacred sites. These regulations align with SLS 8 by recognizing the importance of heritage to community identity, cohesion, and resilience. More specific, Ministry of Education, Culture, Research and Technology establishes Guidelines for Disaster-Resilient Cultural Heritage (2023) that governs the details steps to assess risks and impact of cultural heritage during disaster phases and provide mitigation measure, including risk reduction and recovering process, and stakeholder engagement with relevant ministries, affected communities, and cultural experts to ensure protection and preservation of cultural heritage during disaster management activities		throughout the pre- and post-disaster phases.

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Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
SLS 10: Stakeholder Engagement and Information Disclosure			
Regulations: ● Law No. 32 of 2009 regarding Environmental Protection and Management. ● Law No. 14 of 2008 regarding Public Information Disclosure. ● Law No. 7 of 1984 regarding the Ratification of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). ● Law No. 24 of 2007 on Disaster Management. ● Presidential Instruction No. 9 of 2000 regarding Gender Mainstreaming in National Development. ● Regulation of the Minister of Environment No. 9 of 2010 regarding Procedures for Reporting and Handling Allegations of Environmental Pollution and/or Damage. ● Regulation of the Minister of Environment No. 17 of 2012 regarding Guidelines for Public Participation in Environmental Impact Assessment (AMDAL) and the Environmental Permitting Process. ● BNPB Regulation No. 6 of 2017 regarding the Implementation of Post-	The available national laws and regulations include community participation in environmental security and management, the right of the community to raise objections to project/activity proposals, and the government's obligation to carry out reporting to the community. National regulations have also guaranteed citizens' right to be informed about public policy decisions and encourage public participation in such decision-making, including encouraging women's participation in the development process. At national level, there are guidelines for handling public complaints due to pollution and environmental damage. Communities/people can submit complaints and legal lawsuits related to environmental disputes, including provisions on settlement and environmental compensation. Specific to disaster management, BNPB regulations includes the importance of community	There are opportunities to further enhance meaningful and inclusive participation, especially vulnerable groups. Regulations on information disclosure are still general, not specific to regulate information disclosure that is sustainable and adjusted to the needs of the affected communities.	The Stakeholder Engagement Framework in Chapter 8 provides guidelines for planned, structured, inclusive, and meaningful stakeholder engagement. In addition, Chapter 9 of the ESMS also presents a responsive grievance redress mechanism in accordance with SLS 10.

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Regulations and Guidelines related to SLS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
Disaster Rehabilitation and Reconstruction ● Regulation of the Head of BNPB Number 14 of 2014 regulates the Handling, Protection, and Participation of Persons with Disabilities in Disaster Management ● Regulation of the Head of BNPB No. 13 of 2014 concerning Gender Mainstreaming in Disaster Management. **Guidelines:** ● BNPB Implementation Guidelines No. 5 of 2025 on the Handling of Public Complaints through the Complaint Service Unit. .	engagement, especially vulnerable groups, in all disaster management activities. BNPB has also issued specific regulations on gender mainstreaming and disability inclusion to ensure the active participation of women and people with disabilities in disaster management activities. Moreover, there is an implementation guideline on grievance redress mechanisms that covers accessible grievance channels, procedures for complaint handling, institutional arrangements, and the monitoring process.		

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Annex 3.b. PFB Environmental and Social Standard Gap Mitigation for Emergency Response Phase

Table Annex 3.b. PFB Environmental and Social Standard Gap Mitigation for Emergency Response Phase

Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
SLS 1: Assessment and Management of Environmental and Social Risks and Impacts			
Regulations ● Law No. 32 of 2009 concerning Environmental Management and Protection. ● Law No. 24 of 2007 concerning Disaster Management. ● Government Regulation No. 22 of 2021 on the Implementation of Environmental Protection and Management. ● Government Regulation No. 21 of 2008 concerning the Implementation of Disaster Management. ● BNPB Regulation No. 4 of 2020 concerning the Use of On-Call Budget. **Guidelines:** ● BNPB Guidelines No.3 of 2023 concerning Temporary Housing Assistance for Disaster Victims. (Huntara). ● Regulation of the Head of BNPB No. 24 of 2010 concerning Guidelines for the Preparation of Disaster Emergency Operation Plans.	Activities undertaken during the emergency response phase are exempt from AMDAL preparation; however, environmental and social risks and impacts are addressed through pre-established, activity-specific operational guidelines consistent with the objectives of SLS 1. For instance, BNPB Guidelines No. 3 of 2023 requires emergency housing provision to avoid and minimize adverse environmental impacts, including avoiding conservation areas, restricting the use of environmentally harmful materials, and facilitating stakeholder consultation and grievance redress mechanisms. In addition, the Head of BNPB Regulation No. 4 of 2020 requires monitoring and evaluation to be conducted during disaster emergency operations, supporting ongoing risk management and adaptive implementation in line with SLS 1 principles.	Although no formal environmental and social assessment is required during the emergency response phase, operational guidelines provide measures to manage E&S risks and impacts. These include requirements for the preparation and implementation of disaster emergency operation plans that minimize environmental impacts, avoid impacts on conservation areas, respect local culture and cultural heritage, integrate gender equality and sustainability principles, promote participation and prioritization of vulnerable groups, and ensure structured coordination and communication with affected communities through the disaster command system and displacement management mechanisms.	Mitigation actions under the ESMS will embed SLS 1 requirements into existing BNPB emergency guidelines and reporting workflows, including through the use of monitoring checklists and activity logs. Documentation and reporting will cover the distribution, implementation, verification, monitoring, and evaluation of emergency response activities and will be integrated into existing situation reports or activity logs. This approach supports adaptive management under SLS 1 by enabling the

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Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
			identification of emerging risks and the timely adjustment of mitigation measures during implementation, with more detailed reporting deferred to the post-disaster phase.
SLS 2: Labor and Working Conditions			
Regulations: ● Law No. 13 of 2003 concerning Manpower. ● Law No. 1 of 1970 concerning Occupational Safety. ● Regulation of the Minister of Manpower and Transmigration No. 8 of 2010 concerning Personal Protective Equipment. ● Regulation of the Minister of Manpower No. 3 of 1998 concerning Reporting of Work Accidents. ● Regulation of the Head of BNPB No. 24 of 2010 concerning the Preparation of Disaster Emergency Operation Plan. ● BNPB Regulation No. 5 of 2021 concerning Social Security for Workers in the Field of Disaster Management. ● Regulation of the Head of BNBP No. 13 of 2010 concerning Search, Rescue, and Evacuation.	Indonesia has a robust regulatory framework for the emergency response phase, covering worker safety, the requirements related to PPE, worker's health insurance, SEA/SH prevention, and the protection of vulnerable groups. BNPB has established regulations regarding search, rescue, and evacuation which cover safety equipment that should be used by the emergency workers such as safety vest, safety boots, mask, head, and hand protections, etc. In addition to that, according to Regulation of the Head of BNPB No. 24 Year 2010 regarding the Preparation of Disaster Emergency Operation Plans, requires the	National regulations and BNPB regulations governing workers, including volunteers, and occupational health and safety (OHS) in emergency response activities are considered adequate to support the objectives of SLS 2, as they establish minimum requirements for labor protection, non-discrimination, and OHS, and provide institutional arrangements for the management of workers and volunteers during emergency response operations.	This ESMS will strengthen existing monitoring procedures for emergency response activities to incorporate SLS 2 implementation, including the monitoring of workers and volunteers, occupational health and safety (OHS), and the prevention and management of SEA/SH risks.

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Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
● Regulation of the Head of BNPB No. 24 Year 2010 regarding the Preparation of Disaster Emergency Operation Plans. ● Regulation of the Head of BNPB No. 7 of 2013: Instructions for the Use and Maintenance of Disaster Management Equipment. ● Regulation of the Head of BNPB No. 2 of 2014: Guidelines for the implementation of the use of special disaster management equipment. **Guidelines:** ● Head of BNPB Decree No. 3 of 2022 concerning Rapid Assessment of Disaster Emergencies. ● Head of BNPB Decree No. 6 of 2023 concerning Assessment of Disaster Emergency Management Developments. ● BNPB Implementation Guidelines No. 4 of 2023 concerning Initial Assessment ● BNPB Regulation of the Head of BNPB No. 17 of 2011 on Guidelines for Disaster Management Volunteers.	inclusion of a safety plan that identifies safety hazards and outlines the control measures to be applied throughout the operational period. For health-related aspects, the Disaster Emergency Medical Plan Form requires the completion of standard procedures for providing emergency medical assistance during disasters. During emergency response activities, the engagement of volunteers is common practice. BNPB Regulation of the Head of BNPB No. 17 of 2011 on Guidelines for Disaster Management Volunteers establishes principles consistent with SLS 2, including gender equality, non-discrimination, and respect for local culture, thereby supporting the fair and inclusive treatment of volunteers involved in disaster response operations. BNPB Regulation No. 5 of 2021, as amended by BNPB Regulation No. 5 of 2022, stipulates that non-government personnel and volunteers are entitled to be registered under the *Jaminan Sosial Ketenagakerjaan* program. The program provides coverage for		

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Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
	occupational accidents and death benefits resulting from non-occupational accidents, with coverage applicable for the duration of the individual's assignment or period of work with BNPB.		
SLS 3: Resource Efficiency and Pollution Prevention and Management			
Regulations: ● Law No. 32 of 2009 concerning Environmental Protection and Management. ● Government Regulation No. 27 of 2020 concerning the Management of Specific Waste. ● Minister of Environment and Forestry Regulation No. 1 of 2024 concerning the Management of Waste Generated from Disaster Events. ● Minister of Environment Regulation No. 74 of 2019 concerning the Emergency Program for the Management of Hazardous and Toxic Substances and/or Hazardous and Toxic Waste. ● Regulation of the Minister of Environment and Forestry No. 56 of 2015 concerning Procedures and Technical Requirements for the Management of Hazardous and	National regulations provide an adequate operational framework for the implementation of SLS 3 during emergency response. Regulatory instruments issued by the Ministry of Environment and Forestry and the Ministry of Health govern the management of disaster-related waste, including non-hazardous waste, hazardous and toxic waste (B3), healthcare waste, and electronic waste generated in disaster-affected areas. BNPB regulations and technical guidelines further establish requirements for environmental sanitation, clean water supply, waste and wastewater management, vector control, and public health protection during disaster emergencies. Additional BNPB and Ministry of Environment and Forestry regulations allow for alternative hazardous waste	The existing national regulatory framework is considered sufficient to address most SLS 3 requirements applicable to the emergency response phase. It provides an adequate legal and operational basis for managing pollution risks, debris, non-hazardous and hazardous waste, medical waste, and environmental health protection during disaster emergency operations implemented by BNPB. This framework is further supported by complementary sectoral regulations issued by other relevant ministries and agencies.	The emergency response monitoring checklists under this ESMS are introduced to strengthen existing monitoring procedures related to SLS 3 aspects in the implementation of emergency response activities.

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Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
Toxic Waste from Health Service Facilities. ● Regulation of the Minister of Health Number 2 of 2023 concerning Implementation Regulation of Government Regulation Number 66 of 2014 concerning Environmental Health. ● Regulation of the Head of BNPB No. 7 of 2008 concerning Guidelines and Procedures for Providing Assistance to Fulfill Basic Needs ● BNPB Regulation No. 3 of 2022 concerning the Immediate Recovery of Vital Infrastructure and Facilities **Guidelines:** ● BNPB Guidance No. 3 of 2023 concerning Guidelines for the Implementation of Temporary Housing Assistance for Disaster Victims Refugees (Huntara) ● BNPB Guidelines for Clean Water, Sanitation, and Hygiene Assistance in the Status of Disaster Emergency (2015) ● BNPB Guidelines for Cleaning Up The Environment In A Disaster Emergency (2015)	management measures under emergency conditions where standard practices cannot be fully implemented. BNPB has issued the Guidelines for Cleaning Up the Environment in a Disaster Emergency (2015), which provide guidance on the handling/dumping, temporary storage, and disposal of B3 waste during disaster response operations. This is further reinforced by Regulation of the Minister of Environment and Forestry No. 56 of 2015, which stipulates that under emergency conditions, such as disaster response situations where standard B3 waste management practices cannot be fully implemented, alternative measures including encapsulation, inertization, or controlled burial may be applied, in accordance with the procedures set out in that regulation. Collectively, these frameworks are designed to prevent pollution, minimize public health risks, and protect environmental quality during emergency response.		

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Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
SLS 4: Community Health and Safety			
Regulations: ● Law No. 8 of 2016 concerning Persons with Disabilities ● Law No. 24 of 2007 concerning Disaster Management. ● Government Regulation No. 21 of 2008 concerning the Implementation of Disaster Management. ● Government Regulation No. 42 of 2020 concerning Accessibility to Housing, Public Services, and Disaster Protection for Persons with Disabilities ● Regulation of the Minister of Health No. 1501 of 2010 concerning Certain Types of Infectious Diseases That Can Cause Outbreaks and Efforts to Counter It. ● Regulation of the Minister of Social Affairs No. 9 of 2018 concerning Technical Standards for Basic Services in SPM Sub Social Affairs. ● Regulation of the Minister of Home Affairs No. 101 of 2018 concerning Technical Standards for Basic Services in SPM Sub-Disaster Affairs. ● Regulation of the Minister of Health No. 2 of 2023 concerning Implementation Regulation of Government Regulation No. 66/2014 concerning Environmental Health.	In an emergency context, community health and safety risks under SLS 4 primarily relate to the provision of temporary housing and WASH services. BNPB Guideline No. 3 of 2023 on Temporary Housing Assistance for Disasters establishes requirements to ensure that temporary shelter (*Huntara*) designs meet health, safety, environmental, and structural integrity standards and are implemented by qualified and competent professionals. Construction materials must comply with Indonesian National Standards (SNI), be non-toxic (e.g. free from asbestos), not generate hazardous substances during production, and be sourced locally where feasible, provided that this does not cause environmental harm. The guideline also requires accessibility for persons with disabilities and includes measures to prevent discrimination and harassment. In addition, BNPB Regulation No. 4 of 2018 on the Logistics Management System and Disaster	National regulations and BNPB regulations, together with relevant implementing guidelines, are considered adequate to manage community health and safety risks and impacts under SLS 4 during emergency response. These frameworks establish clear requirements for the design and implementation of temporary housing and WASH services, including health, safety, environmental, and structural standards, the use of qualified professionals, safe construction materials, accessibility for persons with disabilities, and measures to prevent discrimination and harassment. In addition, BNPB regulations governing logistics management require the application of safety measures in the transportation and distribution of relief goods. These regulatory and operational instruments provide a sufficient legal and	This ESMS will strengthen existing monitoring procedures for emergency response activities by operationalizing SLS 4 requirements through their integration into practical emergency response monitoring checklists during implementation of emergency response operations.

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Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
● Regulation of the Head of BNPB No. 13 of 2014 concerning Gender. Mainstreaming in the Field of Disaster Management. ● Minister of Women's Empowerment and Child Protection Regulation No. 8 of 2024 concerning the Protection of Women and Children from Gender-Based Violence in Disaster Management. ● Regulation of the Head of BNPB Number 14 of 2014 regulates the Handling, Protection, and Participation of Persons with Disabilities in Disaster Management ● BNPB Regulation No. 4 of 2018 concerning Logistics Management System and Disaster Management Equipment ● Regulation of the Head of BNPB No. 10 of 2012 concerning Logistics Management in the Status of Disaster Emergency ● BNPB Regulation No. 3 of 2018 concerning the Implementation of Refugee Handling in Disaster Emergencies. **Guidelines:** ● BNPB Guidelines No.3 of 2023 concerning Temporary Housing Assistance for Disaster Victims.	Management Equipment requires the application of safety measures in the transportation and distribution of logistics during emergency response operations. These provisions support the management of community health and safety risks in line with the objectives of SLS 4. Head of BNPB Regulation No. 13 of 2014 and Minister of PPPA Regulation No. 8 of 2024 require gender mainstreaming and the prevention and handling of SEA/SH in all stages of disaster management. These regulations set standards and procedures for preventing and handling SEA/SH, integrated with the provision of basic needs, shelter/ temporary housing, water and sanitation, health, education, and psychological services. The regulations emphasize survivor-centered approaches, complaint handling and referral services. Coordination and operations are led by Sub-Cluster for child protection and Prevention of gender-based violence under the	institutional basis to prevent, minimize, and manage community health and safety risks during emergency response operations. Mitigating community safety risks, including preventing sexual exploitation, abuse and sexual harassment (SEA/SH), needs to be more adequately regulated.	

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Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
	command system. Monitoring and evaluation tools are in place, including security audits of evacuation sites, checklists for health and psychosocial service facilities and infrastructure, referral mapping, and monitoring of the integration of SEA/SH prevention and response into disaster management.		
SLS 5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement			
Regulations: ● Regulation of the Head of BNPB No. 7 of 2008 concerning Guidelines and Procedures for Providing Assistance to Fulfill Basic Needs. ● Regulation of the Head of BNPB No. 24 of 2010 concerning Guidelines for the Preparation of Disaster Emergency Operation Plans. ● BNPB Regulation No. 3 of 2018 concerning the Handling of Refugees in Disaster Emergency Situations. ● BNPB Regulation No. 5 of 2018 concerning Conditions and Procedures for Disaster Management under Certain Circumstances. ● BNPB Regulation No. 3 of 2022 concerning the Immediate Restoration of Vital Infrastructure and Facilities.	In emergency response contexts, land-use activities financed under the PFB are primarily intended to support emergency shelters or temporary housing provisions. Related to that, Indonesian regulations in emergency conditions are consistent with core SLS 5 principles prohibiting forced eviction, ensuring continued basic assistance for displaced persons, and promoting meaningful engagement with affected populations in the siting of emergency shelters and temporary housing. BNPB regulations (BNPB Regulation No. 4 of 2020 on the Use of On-Call Budget and BNPB Guidelines No.3	In an emergency context requiring rapid assessment and action, existing regulations are adequate to ensure implementation of SLS 5.	Land Due Diligence during emergency response activities will follow BNPB regulations and procedures for emergency activities. This ESMS will include an effort to strengthen monitoring and capacity building to ensure implementation of SLS 5 based on the Land Due Diligence Guideline.

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Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
• The Head of BNPB Regulation No. 4 of 2020 concerning the Use of On-Call Budget **Guidelines:** • Guidelines for the Determination of Disaster Emergency Status (BNPB, 2016). • BNPB Guidelines No.3 of 2023 concerning Temporary Housing Assistance for Disaster Victims.	of 2023 on Temporary Housing Assistance for Disaster Victims) stipulate that potential land used for shelters or temporary housing must meet minimum technical standards for shelters and temporary housing, and require comprehensive risk assessments of potential land used covering environmental, geological, and social risks to ensure sites are suitable and safe for temporary settlement. In addition, the standards mandate verification that land ownership and all relevant permits are clear, legally valid, and free from disputes, thereby reducing the likelihood of future legacy issues or social conflicts. In addition, BNPB Regulation No. 3 of 2018 on the Handling of Refugees in Disaster Emergency Situations provides a framework for compensation and livelihood restoration throughout the displacement cycle, from initial sheltering through return or relocation. This includes wage payments for employed refugees, compensation and restoration of residency and political rights, assistance with document replacement, financial support for		

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Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
	housing repairs, replacement of seeds and livestock, rental assistance for housing and business land, and monitoring of compensation and rights restoration processes.		
SLS 6: Biodiversity Conservation and Sustainable Management of Living Natural			
Regulations: ● Law No. 32 of 2009 concerning Environmental Protection and Management. ● Law No. 24 of 2007 concerning Disaster Management ● Law No. 32 of 2024 Amendments to Law No. 5 of 1990 concerning the Conservation of Biological Natural Resources and Their Ecosystems. ● Government Regulation No. 28 of 2011 concerning the Management of Nature Reserve Areas (KSA) and Nature Conservation Areas (KPA). ● Government Regulation of the Republic of Indonesia Number 23 of 2021 concerning the Implementation of Forestry ● Regulation of the Minister of Environment No. 29 of 2009 concerning Guidelines for Biodiversity Conservation in the Regions.	Indonesia's regulatory framework provides a strong basis for biodiversity conservation in line with SLS 6, including the protection of legally designated protected areas, natural habitats, ecosystem integrity, and protected species. At the same time, the framework allows for limited and temporary use of forest areas (i.e., production and protected forests) for disaster emergency response (such as evacuation routes, temporary shelters for affected communities, and temporary use of affected livelihood areas) when required for life-saving actions. Such use is regulated under Government Regulation No. 23 of 2021 and operationalized through the Regulation of the Minister of Environment and Forestry No. 7 of 2019 on Forest Area Borrow-and-Use Permits (*Izin Pinjam Pakai*	Existing BNPB guidelines and relevant national regulations on biodiversity are considered adequate to support the implementation of SLS 6, as they incorporate key principles consistent with SLS 6, including the avoidance and minimization of impacts on natural habitats and biodiversity during emergency response activities. These requirements apply to emergency interventions, such as the siting of temporary shelters (*Huntara*), including in or near conservation areas. Accordingly, no additional ESMS-specific measures are proposed for SLS 6 implementation during the emergency response phase.	The emergency response monitoring checklists under this ESMS are introduced to strengthen existing monitoring procedures related to SLS 6 aspects in the implementation of emergency response activities

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Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
● Minister of Environment and Forestry Regulation No. 106 of 2018 concerning Protected Plant and Animal Species. ● Regulation of the Minister of Environment and Forestry of the Republic of Indonesia No.P.7/Menlhk/Setjen/Kum.1/2/2019 concerning Amendments to the Regulation of the Minister of Environment and Forestry No. P.27/Menlhk/Setjen/Kum.1/7/2018 concerning Guidelines for Borrowing and Using Forest Areas. **Guideline** ● BNPB Guidelines No.3 of 2023 concerning Temporary Housing Assistance for Disaster Victims (Huntara).	*Kawasan Hutan*), ensuring that emergency use is temporary, limited in scope, and subject to environmental safeguards and post-use rehabilitation. BNPB Guidance No. 3 of 2023 regulates the construction of temporary housing to minimize negative impacts to the environment including the use of conservation areas, use of substances harmful to the environment and obtain the material without damaging the environment.		
SLS 7: Indigenous Peoples			
Regulations: ● Law No. 24 of 2007 concerning Disaster Management. ● Government Regulation No. 21 of 2008 concerning the Implementation of Disaster Management. ● BNPB Regulation No. 3 of 2018 concerning the Handling of Refugees in Disaster Emergency Situations.	BNPB regulations on disaster management acknowledge and value cultural and local wisdom, while mandating the integration of gender equality, sustainability, participation, and prioritization of vulnerable groups. Cultural and local wisdom is incorporated not only through risk assessments of proposed temporary shelter	Considering the scope of potential emergency activities, there are no significant regulatory gaps identified in implementing SLS 7 during emergency conditions. However, when basic services are provided, or temporary shelters/ housing are planned in areas of Customary	This ESMS will strengthen monitoring procedure of emergency response activities to include SLS 7 implementation and integrate customary communities' related mitigation measures based on IPPF into

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Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
● Minister of Home Affairs Regulation No. 52 of 2014 concerning Guidelines for the Recognition and Protection of Customary Law Communities. **Guidelines:** ● Implementation Guidelines of the Head of BNPB No. 3 of 2022 concerning Rapid Assessment in Disaster Emergency Situations. ● Implementation Guidelines of the Head of BNPB No. 4 of 2023 concerning Initial Assessment. ● Implementation Guidelines of the Head of BNPB No. 6 of 2023 concerning the Assessment of Disaster Emergency Response Progress. ● Guidelines for the Determination of Disaster Emergency Status (2016). ● BNPB Guidelines No.3 of 2023 concerning Temporary Housing Assistance for Disaster Victims.	locations, but also by ensuring that all aspects of emergency response, such as safety and access to basic services, reflect the community's perspectives and agreement. During the emergency response phase, in the displacement/shelter cluster includes a technical team on Indigenous Peoples' protection, involving *Aliansi Masyrakat Adat Nusantara* (AMAN) to ensure the meaningful engagement of Indigenous Peoples (IPs) in activities. Additionally, affected communities, including Customary Communities, actively participate by providing input and guidance at every stage of the process, to ensure that implementation of activities remains closely aligned with the social and cultural context, and fostering ownership of disaster management efforts.	Communities, specific consent mechanisms for Customary Communities may be required. These mechanisms help ensure that agreements are reached through a consultative process that respects the socio-cultural background of Customary Communities, fostering mutual understanding and minimizing potential conflicts.	capacity building materials.
SLS 8: Cultural Heritage			
Regulations: ● Regulation of the Head of BNPB No. 24 of 2010 concerning Guidelines for	National regulations have established operational guidelines for protecting and preserving cultural heritage across all phases of	No significant gaps have been identified. Existing regulations and guidelines are considered adequate to implement SLS 8	The Chance Find Procedure in this ESMS complements existing government protocols

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Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
the Preparation of Disaster Emergency Operation Plans. ● Regulation of the Head of BNPB No. 9 of 2008 on Standard Operating Procedures for the BNPB Rapid Response Team. **Guidelines:** ● Guidelines of the Head of BNPB No. 4 of 2023 on Initial Assessment on Emergency Response Situation. ● Guidelines of the Head of BNPB No. 6 of 2023 on the Assessment of Progress in Disaster Emergency Response. ● Guidelines for the Determination of Disaster Emergency Status (BNPB, 2016). ● Guidelines for Disaster-Resilient Cultural Heritage (Ministry of Education, Culture, Research and Technology, 2023).	disaster management, including emergency response, to ensure compliance with SLS 8 requirements. The Guidelines for Disaster-Resilient Cultural Heritage (Ministry of Education, Culture, Research and Technology, 2023) provide detailed procedures for assessing risks and impacts to cultural heritage during disaster management. They also outline mitigation measures, risk-reduction strategies, and protection and recovery processes, and highlight the importance of engaging stakeholders, including relevant ministries, affected communities, and cultural experts, to ensure protection and preservation of cultural heritage during emergency response activities.	in the context of emergency response activities.	for Cultural Heritage Protection and Preservation during disaster emergencies. Cultural heritage considerations can be systematically integrated into rapid assessments, emergency operations plan, and emergency response monitoring checklists.
SLS 10: Stakeholder Engagement and Information Disclosure			
Regulations: ● BNPB Regulation No. 3 of 2018 concerning the Handling of Refugees in Disaster Emergency Situations. ● Regulation of the Head of BNPB No. 3 of 2016 concerning the Disaster	The national disaster management regulations emphasize structured coordination and communication with affected communities through the command system and refugee management procedures. During emergency response phase, both	There are no significant gaps between existing regulations and compliance with SLS 10 for emergency response activities. Existing regulations related to stakeholder engagement and GRM can be strengthened by	Stakeholder engagement during emergency response activities will comply with BNPB regulations and established procedures. This

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Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
Emergency Response Command System. ● BNPB Regulation No. 3 of 2020 on BNPB Business Processes. ● Regulation of the Head of BNPB No. 9 of 2008 on Standard Operating Procedures for the BNPB Rapid Response Team. ● Regulation of the Head of BNPB Number 14 of 2014 regulates the Handling, Protection, and Participation of Persons with Disabilities in Disaster Management ● Regulation of the Head of the National Disaster Management Agency (BNPB) Number 10 of 2023 concerning Implementation Guidelines for the Emergency Disaster Management Command System in Regency/City Disaster Emergency Status. ● BNPB Regulation No. 4 of 2020 on the Use of On-Call Budget. **Guidelines:** ● BNPB Guidelines No.3 of 2023 concerning Temporary Housing Assistance for Disaster Victims	regulations promote information dissemination regarding safety, evacuation, access to assistance, and service availability, which aligns with SLS 10 principles on ensuring timely and accessible information disclosure. Engagement with affected parties, including displaced persons and community representatives, is encouraged to identify disaster affected people, urgent needs and sustain humanitarian supports, reflecting a commitment to transparency and inclusive communication. The framework also outlines the role of government units, humanitarian actors, and community groups in maintaining coordination at evacuation sites and service points. This effort promotes participatory interaction between responders and affected communities, including grievance and feedback related to basic needs, safety, relocation, and service delivery. These provisions support community involvement and social inclusion during emergency response management. In addition to that, there is a community engagement working group within	developing technical guidelines to provide more practical instruments to ensure inclusion of stakeholder engagement in emergency response measures.	includes developing the Command System, ensuring community involvement at every stage of the emergency response, providing clear and timely updates on activities, and maintaining comprehensive documentation and reporting. The GRM for emergency response activities will also be implemented in accordance with BNPB procedures. Complaint centers will be established at temporary shelters and command posts, ensuring grievance and feedback mechanisms are accessible and adequately resourced. This ESMS will strengthen monitoring and capacity building to support the effective implementation of SLS

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Regulations and Guidelines related to ESS PFB	Relevant environmental and social aspects	Gaps Identified	Mitigation Actions under ESMS PFB
	the displacement/shelter cluster, which is also supported by NGOs. In line with BNPB regulations on the Command System for the emergency response phase, complaint centers within Emergency Disaster Response Posts (*Posko Tanggap Darurat Bencana*) must provide accessible grievance mechanisms and facilities to effectively receive, manage, and resolve public complaints and feedback. The GRM is also regulated by the BNPB Regulations on On-Call Budget, which require the establishment of a grievance redress system at the national and subnational levels.		10 during emergency response phase, guided by the Stakeholder Engagement Framework outlined in Chapter 8 and GRM in Chapter 9.

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Annex 4. Negative List of PFB

Activities financed by the PFB must be classified as having the lowest possible impact on the environment and society. The Environmental and Social Management System (ESMS) includes a negative list, which comprises activities considered very high risk to the environment and society, with potential adverse impacts or regulatory violations. During the screening phase, this negative list serves as the primary reference to assess proposed activities and prevent prohibited activities from being funded by the PFB. Any prospective activity that appears on the negative list is automatically excluded from eligibility for PFB funding.

Activities supported by the PFB must not include those listed on the negative list, including:

1. Activities involving the purchase of alcoholic beverages, tobacco products, recreational drugs, luxury goods, military goods, radioactive materials, and/or other similar goods[46].
2. Transactions prohibited by national laws and regulations and UN Security Council decisions under Chapter VII of the UN Charter.
3. Indicated and/or potentially violating laws and regulations.
4. Activities involving materials that are prohibited under international and national regulations including but not limited to the production and/or use of products containing asbestos materials and/or unbound asbestos fibers.
5. Activities that exhibit discriminatory behavior.
6. Potentially involving child labor and/or forced labor that is not in accordance with the provisions of laws and regulations in the field of employment.
7. Activities that will, or may potentially, cause permanent and/or significant damage to irreplaceable cultural assets, heritage sites, historic buildings, and/or archaeological sites.
8. Activities that will likely bring adverse impact to existing or proposed legally protected areas and/or internationally recognized areas, without demonstrating a technically acceptable process to mitigate biodiversity loss and that the activity is legally permitted and act consistently with any recognized management plans.

[46] For goods intended for military or paramilitary purpose or for luxury consumption.

Annex 5. Environmental and Social Safeguards Form

The Environmental and Social (E&S) Safeguards Form is a mandatory form to be completed by the proponent as part of the proposal submission process under the PFB. The form functions as the screening tool to identify, assess, and classify potential environmental and social risks and impacts associated with the proposed activity.

The E&S Safeguards Form captures key information required to support risk-based decision-making across the activity lifecycle, including pre-disaster, emergency response (where applicable), and post-disaster phases. Information collected through this form provides the basis for determining activity eligibility, confirming that the activity is not included in the negative list, and establishing the applicable E&S risk classification.

Specifically, the form requires information on:

(iv) basic activity and proponent details;
(iv) the proponent's experience in environmental and social assessment and management;
(iv) initial identification of potential E&S risks and impacts through screening questions; and
(iv) indicative E&S risk classification and applicable E&S assessment and management instruments, in line with Government of Indonesia regulations and ESMS requirements.

The completed E&S Safeguards Form is reviewed to determine the proportional E&S instruments and commitments required for the proposed activity and serves as a reference for subsequent monitoring, evaluation, and reporting throughout implementation.

Proposed Activity Title	(*fill in the name of the proposed activity*)
1. Information about activity/project proponent and project/activities	
a. Activity Administration	*Following BNPB PFB template proposal/ PVE PFB Implementation Instructions*
- Summary of proposed activities - Institution/ Agency Profile	
b. Location Description and Permits	
- Name of activity location - Description the location of the activity - Land ownership status of the activity location - Geographical description	

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- Required permits	
c. Policies Related to the Proposed Activity Identify the laws and regulations that apply to the activity	
2. Experience in Environmental and Social Assessment and Management	
Do you have experience in environmental and social assessment and/or management?	If Yes, describe: ● Name of activity/project ● Type of activity ● Location ● Year/period of implementation ● Applicant's role in E&S assessment and/or management E&S instruments used (e.g., AMDAL, UKL-UPL, SPPL, ESMP, or other instruments)
	If No, please describe the arrangements or support planned to ensure that E&S risk and impact management can be implemented in accordance with ESMS requirements (e.g. technical assistance, use of consultants, or capacity building)
3. E&S Risk and Impact Assessment and Management	
Based on the results of the negative list screening, the proposed activity (choose one answer): [ ] Included in the negative list number… (fill in with the negative list number) [ ] Not included in the negative list For Negative list number 8, please briefly explain result from screening against negative list as per the Annex 12. Biodiversity Management Framework (e.g., activity is not located within the concerned areas, activities are located within the concerned areas but have obtained the required permit and will not bring adverse impacts to biodiversity as evidenced by the BMP, etc.).	
E&S Screening Checklist: ☐ The applicant hereby declares that the E&S Screening Checklist has been completed in full in accordance with the questions listed in Annex 5a.	
E&S Risk Classification: 1. Based on the results of the E&S Screening Checklist, how is the E&S risk classification of the proposed activity? ☐ Low ☐ Moderate ☐ Substantial ☐ High	

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Please briefly explain the reasons for determining the risk classification, referring to the relevant key factors as per the Annex 5b. Risk Classification (e.g., scale of activity, location, type of potential impact, vulnerable groups affected, and E&S management capacity).
Preparation of E&S Assessment and Management Instrument: 1. What environmental and social instruments/permits are required under Government of Indonesia (GOI) regulations for the proposed activity? ☐ AMDAL ☐ UKL–UPL ☐ SPPL ☐ Not applicable (please explain): _____ 2. Are all the instruments/permits available or currently in the process of being prepared? ☐ Available ☐ In progress ☐ Not yet available If not yet available or still in progress, please explain the plan and schedule for their completion: _____ 3. Based on the E&S risk classification and E&S Screening List, what additional E&S assessment and/or management instruments are required under the ESMS? (e.g., supplementary ESIA, ESMP, or other thematic management plans) _____ 4. What annexes are included in this form as part of the E&S requirements? (Please specify the relevant Annex number) ☐ Annex ___ : _____ ☐ Annex ___ : _____ ☐ Annex ___ : _____ *example: ☐ Annex ___ : Land Due Diligence Assessment (*mandatory if the activity requires land)

4. Stakeholder Engagement and Grievance Mechanism	
- Related stakeholders	
- Identify when/ where the public consultation process will take place, if necessary.	
- Do you have a complaint mechanism?	
- What complaint mechanism is available?	

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A. Environmental and Social Risk Classification

When determining the level of environmental and social risk, activity proponents must carefully consider the criteria to ensure that the self-assessment is consistent with the actual conditions of the proposed activity.

If an activity is assessed as meeting one or more criteria at a risk level, then the proposed activity is classified at that risk. When an activity triggers multiple risk levels across different E&S aspects, the activity shall be classified at the highest risk level.

For example:

- If an activity triggers low risk for environmental impacts, moderate risk for labor issues, and high risk for community health and safety, the activity is classified as high risk overall.
- if an activity triggers low risk for most criteria but substantial risk for biodiversity impacts, the activity is classified as substantial risk overall.

The overall risk classification determines the required E&S instruments, supervision of intensity, and clearance of authority as outlined in section 4.2 (Chapter 4). When the required instrument is limited to environmental documents as per Government of Indonesia Regulations (e.g., SPPL or UKL-UPL), preparation of the documents is encouraged to consider management measures relevant to the proposed activity as per ESCOPs to the extent possible.

Risk Classification	Description	Required Instrument
High	A range of significant risks and negative impacts on humans and/or the environment include: • long-term, permanent and/or irreversible risks and negative impacts are impossible to avoid completely due to the nature of the activity. • have a high magnitude and/or a high area of influence/coverage. • impacts that cannot be completely avoided due to the nature and characteristics of the activity. • high probability of serious impacts to human health, safety, or the environment (e.g. major accidents, hazardous waste management, heavy pollution, severe social conflicts); • potential for cumulative adverse impacts or significant cross-regional impacts; and • Certain significant adverse environmental and social (E&S) risks and impacts arising from activities that cannot be fully	Environmental documents as per Government of Indonesia Regulations, Supplementary ESIA, and ESMP, and other E&S thematic instrument as identified in the E&S screening, land due diligence as relevant, SEA/SH Action Plan.

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Risk Classification	Description	Required Instrument
	addressed, or from specific countermeasures, may require complex or unproven mitigation or compensatory measures, advanced technologies, or sophisticated social analysis and implementation.	
Substantial	Activities may not be as complex as High-Risk Activities, the scale of ES and its impacts may be smaller (large to medium) and the location may not be in a highly sensitive area, and some risks and impacts may be significant. Activities have the potential to pose significant risks and negative impacts, but they can still be managed. It will consider whether the risks and potential impacts are most or all of the following characteristics: • most of it is temporary or partly permanent, predictable and/or changeable and the nature of the activity does not preclude the possibility of avoiding or altering it. • have a medium to high probability and/or medium to large magnitude. • include risks to human health and safety, social security, and the environment (e.g. work accidents, toxic waste disposal, social disturbances etc.). • The impact is site-specific or limited in scope. • Mitigation and/or compensation mechanisms are available and reliable but require robust planning and management.	Environmental documents as per Government of Indonesia Regulation, Supplementary ESIA, and ESMP, and other E&S thematic instrument as identified in the E&S screening, land due diligence as relevant, SEA/SH Action plan.
Moderate	Potential risks and negative impacts that are minimal or negligible to humans and/or the environment. This is because these activities are not complicated and/or large, do not involve activities that have a high potential to harm the community or the environment, and are located far from environmentally or socially sensitive areas. Thus, the potential risks and impacts as well as the problems tend to have the following characteristics: • predictable and predictable to be temporary and/or recoverable. • site-specific. • low to medium intensity. • have a low probability of serious impacts on human health or the environment (e.g. do not involve the use or disposal of toxic materials,	Environmental Documents as per Government of Indonesia Regulations (prepared by taking consideration of relevant management measures in the ESCOPs) and land due diligence (as relevant).

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Risk Classification	Description	Required Instrument
	routine safety precautions are estimated to be sufficient to prevent accidents, etc.). • The risks and impacts of activities can be easily controlled and addressed in a predictable manner through the implementation of good environmental and social management practices.	
Low	The potential risks and negative impacts on humans and/or the environment tend to be minimal or negligible. These activities, with little or no risk and adverse impacts and issues, do not require further E&S assessment after initial screening.	Environment Documents as per Government of Indonesia Regulations and land due diligence (as relevant).

B. Environmental and Social Screening List

This checklist is used by proponents to assess the environmental and social (E&S) risks of their activities. The proponent identifies each indicator related to the Environmental and Social Standards that may be triggered by the impacts and risks of the proposed activity. If the question in the indicator is not relevant to the proposed activity, the proponent must answer "No." If the question in the indicator is relevant, the proponent must answer "Yes." If the answer is "Yes," the proponent must identify the potential impacts and the instruments needed to mitigate the environmental and social risks associated with each related indicator.

No.	Parameter	Yes	No	If Yes, briefly describe whether potential risks or impacts are significant and see Related Attachments
1	Does the proposed activity include small- to medium-scale, Including construction work and/or renovations?			• Annex 10: Environmental and Social Codes of Practices (ESCOPs)

No.	Parameter	Yes	No	If Yes, briefly describe whether potential risks or impacts are significant and see Related Attachments
2	Does the proposed activity include medium-to-large construction work and/or renovations?			• Annex 8. Introduction to Supplementary ESIA • Annex 11: Risk and Hazard Assessment • Annex 9: Environmental and Social Management Plan (ESMP) Procedure • Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 15: Land Due Diligence Guideline Assessment
3	Will the proposed activity involve a mixed workforce (local contractors and/or facilitators and/or external consultants)?			• Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 9: Environmental and Social Management Plan (ESMP) Procedure • Annex 14: Stakeholder Engagement Plan Template
4	Will the proposed activity involve the procurement of electrical and electronic equipment and components that could result in the onset of e-waste?			• Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 11: Risk and Hazard Assessment • Annex 9: Environmental and Social Management Plan (ESMP) Procedure

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No.	Parameter	Yes	No	If Yes, briefly describe whether potential risks or impacts are significant and see Related Attachments
5	Is there potential for hazardous work conditions that may expose workers to unsafe work practices or exposure to hazardous substances or conditions?			• Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 11: Risk and Hazard Assessment • Annex 9: Environmental and Social Management Plan (ESMP) Procedure
5	Will the construction or operation of the activity use non-living natural resources, including water and/or raw materials, especially any resources which are non-renewable or in short supply?			• Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 9: Environmental and Social Management Plan (ESMP) Procedure
6	Would the proposed activity pose an increased risk of soil degradation or erosion?			• Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 9: Environmental and Social Management Plan (ESMP) Procedure
7	Will the proposed activity generate or increase the production of solid or liquid waste (e.g. liquid waste, hazardous waste, domestic waste or construction waste)?			• Annex 10: Environmental and Social Codes of Practices (ESCOPs) Annex 9: Environmental and Social Management Plan (ESMP) Procedure
8	Will the proposed activity result in the release of pollutants to air (including nuisances), water and land due to routine, nonroutine, and accidental circumstances?			• Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 9: Environmental and Social Management

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No.	Parameter	Yes	No	If Yes, briefly describe whether potential risks or impacts are significant and see Related Attachments
				Plan (ESMP) Procedure
9	Does the proposed activity generate waste containing asbestos and require asbestos disposal?			• Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 9: Environmental and Social Management Plan (ESMP) Procedure
10	Will the proposed activity result in problems with OHS, disruption to the work environment, and/or public health and safety risks? (traffic and road safety, disease spread, emergency preparedness & response)			• Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 9: Environmental and Social Management Plan (ESMP) Procedure
11	Is the proposed activity located within, or does it have the potential to adversely affect an area that is legally protected, designated for protection, or internationally recognized as an area of high biodiversity value?			• Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 9: Environmental and Social Management Plan (ESMP) Procedure • Annex 12: Biodiversity Management Framework (BMF)
12	Will the proposed activity be located within or in the vicinity of environmentally sensitive area (e.g., intact natural forests, mangroves, coral reefs, wetlands) or habitat of threatened, endangered and/or critically endangered species?			• Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 9: Environmental and Social Management Plan (ESMP) Procedure

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No.	Parameter	Yes	No	If Yes, briefly describe whether potential risks or impacts are significant and see Related Attachments
				• Annex 12: Biodiversity Management Framework (BMF)
13	Will the activity involve vegetation planting and may result in intentional or accidental introduction of alien, or non-native, alien species of flora and fauna into areas where they are not formally found?			• Annex 10: Environmental and Social Codes of Practices (ESCOPs)
14	Does the proposed activity require land (public or private)? to be acquired (temporary or permanent)?			• Annex 8: Introduction to Supplementary ESIA • Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 9: Environmental and Social Management Plan (ESMP) Procedure • Annex 15: Land Due Diligence Guideline Assessment
15	Will the proposed activity involve the use of fertilizers and/or pesticides?			• Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 9: Environmental and Social Management Plan (ESMP) Procedure
16	Are socio-cultural groups located in the activity area, or those that use the activity area, that can be considered "indigenous/ ethnic minorities/tribal groups"?			• Annex 8: Introduction to Supplementary ESIA • Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 16: Indigenous People Planning Framework (IPPF)

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No.	Parameter	Yes	No	If Yes, briefly describe whether potential risks or impacts are significant and see Related Attachments
17	Are there any community members from indigenous groups in the activity area who will benefit from or be negatively impacted by the activity?			• Annex 8: Introduction to Supplementary ESIA • Annex 10: Environmental and Social Codes of Practices (ESCOPs) • Annex 16: Indigenous People Planning Framework (IPPF)
18	Do such groups have social/cultural/spiritual ties to ancestral territories and/or to natural resources in the activity territories?			• Annex 8: Introduction to Supplementary ESIA • Annex 16: Indigenous People Planning Framework (IPPF)
19	Do such groups use a native/local language that is different from the national language, or the language spoken by the majority of the community, in the activity area?			• Annex 8: Introduction to Supplementary ESIA • Annex 16: Indigenous People Planning Framework (IPPF)
20	Are such groups historically, socially, and economically marginalized, disenfranchised, excluded, and/or discriminated against?			• Annex 8: Introduction to Supplementary ESIA • Annex 16: Indigenous People Planning Framework (IPPF)
21	Will the proposed activity pose a risk of damaging tangible[47] and/or intangible cultural heritage [1]?			• Annex 8: Introduction to Supplementary ESIA • Annex 17: Chance Finds Procedure

[47] Tangible cultural heritage, which includes movable or immovable objects, sites, structures, groups of structures, and natural and landscape features that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be located in an urban or rural environment and may be above or below ground level or below the water level. Intangible cultural heritage, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artifacts, and cultural spaces associated with them—that societies and groups recognize as part of their cultural heritage, that are passed down from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history

No.	Parameter	Yes	No	If Yes, briefly describe whether potential risks or impacts are significant and see Related Attachments
22	Will the proposed activity interact closely with communities living near the subproject activity site?			• Annex 9: Environmental and Social Management Plan (ESMP) Procedure • Annex 13: SEA/SH Risk Management
23	Will the proposed activity involve interaction between the contractor and local beneficiaries in remote areas and affected communities?			• Annex 11: Risk and Hazard Assessment Annex 9: Environmental and Social Management Plan (ESMP) Procedure • Annex 14: Stakeholder Engagement Plan Template
24	Will the activity area be located within customary land/forest?			• Annex 12: Biodiversity Management Framework (BMF)
25	Will the activity result in potential traffic and road safety risks to workers, communities, and road users during construction and operation (e.g., involving the mobilization of heavy equipment or heavy equipment vehicles, transportation of toxic and hazardous materials)?			• Annex 8: Introduction to Supplementary ESIA • Annex 9: Environmental and Social Management Plan (ESMP) Procedure • Annex 10: Environmental and Social Codes of Practices (ESCOPs)
26	Does the activity have the potential to cause a potential emergency (exacerbate the potential risk of an applicable natural hazard?)			• Annex 8: Introduction to Supplementary ESIA • Annex 9: Environmental and Social Management Plan (ESMP) Procedure

Annex 6. Environmental and Social Safeguards Statement

ENVIRONMENTAL AND SOCIAL PROTECTION STATEMENT

[ACTIVITY NAME] - [ACTIVITY LOCATION] - [YEAR]

The undersigned:

Name :

Position :

Institution :

Address :

I declare that the information included in this working paper and the accompanying documents are in accordance with the actual conditions and their validity and accuracy can be verified.

We are willing to verify any incorrect/inaccurate information further to facilitate further decision-making regarding our proposed activity.

[…place…,…date month year…]

Proponent,

signature, stamp, and seal/

TTE and e-seal

[…..full name and signature…..]

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Annex 7. Proponent Environmental and Social Commitment

PROPONENT ENVIRONMENTAL AND SOCIAL COMMITMENT

[ACTIVITY NAME], [ACTIVITY NUMBER]

[YEAR]

1. The [Name of Proponent] commits to implement all applicable environmental and social (E&S) requirements in accordance with the ESMS and the instruments identified for the proposed activity. This commitment includes the integration of E&S considerations into activity planning, implementation, monitoring, and reporting throughout the activity lifecycle.
2. The [Name of Proponent] further confirms that adequate resources and budget allocation for E&S implementation have been considered and included in the activity proposal and will be made available to ensure effective management of E&S risks and impacts.
3. Where changes in activity scope, implementation arrangements, or unforeseen circumstances result in additional or modified E&S risks and impacts, the [Name of Proponent] commits to adjust E&S measures and allocate additional resources, as necessary, in coordination with BNPB and in accordance with applicable ESMS procedures.

Material measures		**Timeframe**
Monitoring and reporting	A. REPORTING [Prepare and submit regular monitoring reports on the activity's environmental and social performance. This includes providing updates on the implementation of Proponent E&S Commitment measures, progress in implementing required environmental and social documents under Proponent E&S commitment guidelines, engagement with stakeholders, incident, and accident, as well as the effectiveness of grievance redress mechanisms.]	*[Indicate frequency of reporting, e.g. quarterly, six-monthly, yearly throughout Activity implementation].*
SLS 1: Evaluation and Management of Environmental and Social Risk and Impact	1.1. ORGANIZATIONAL STRUCTURE: [Establish organizational structure with adequate personnel/resources to support environmental and social risk management]	
	1.2. ENVIRONMENTAL AND SOCIAL ASSESSMENT AND MANAGEMENT: [Include requirements for activity proponents to implement, monitor, and evaluate management and monitoring measures as described in the submitted management plans]	
SLS 2: Labor and Working Conditions	2.1. OCCUPATIONAL HEALTH AND SAFETY PROTECTION MEASURES: [Adopt and implement	

Material measures		Timeframe
	the occupational health and safety (OHS) measures as specified in the ESMP].	
SLS 3: Resource Efficiency and Pollution Prevention Management	3.1. WASTE MANAGEMENT PLAN: [Adopt and implement Waste Management Plan (if applicable)]	
	3.2. RESOURCE EFFICIENCY AND POLLUTION PREVENTION MANAGEMENT: [Adopt and implement measures for resource efficiency and pollution prevention and management contained in the ESMP and other relevant E&S instruments].	
SLS 4: Community Health and Safety	4.1. COMMUNITY HEALTH AND SAFETY: [Adopt and implement measures and actions in mitigating potential impacts arising from the implementation of activity on community health and safety, as contained in the ESMP or other relevant E&S instruments (e.g., TMP). Examples of the risks are increased prevalence of diseases, accidents resulting from Activity design or failure of activity structures, reduced resources due to Activity implementation].	
	4.2. GENDER BASED VIOLENCE, SEXUAL EXPLOITATION AND SEXUAL HARASSMENT: [For activities with moderate, substantial, and high-risk level of gender-based violence.] [Where necessary, include additional funds available to implement measures to address the risks and impacts of gender-based violence, sexual exploitation and sexual harassment that may arise during activity implementation.]	
SLS 5: Land Acquisition and Involuntary Resettlement	5.1. LAND DUE DILIGENCE &: [Adopt land due diligence and implement corrective action plan [if necessary]/ in accordance with the SLS5 and in compliance with the laws and regulations.]	
	5.2. GRIEVANCE MECHANISM: [Grievance mechanism related to resettlement should be described in the framework of land acquisition, land demarcation, and resettlement].	
SLS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	6.1. BIODIVERSITY RISK AND IMPACT: [Adopt and implement biodiversity management measures in ESMP or BMP in accordance with the SLS 6 and in compliance with the laws and regulations.]	

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Material measures		Timeframe
SLS 7: Indigenous Peoples	INDIGENOUS PEOPLES: [Implement IPPF/ prepare and implement Indigenous People Plan (IPP) in accordance with SLS7.]	
SLS 8: Cultural Heritage	CHANCE FIND PROCEDURES: [Adopt and implement chance find procedures for material/physical objects in accordance with the statutory regulations.]	
SLS 10: Stakeholder Engagement and Information Disclosure	IMPLEMENTATION OF STAKEHOLDER ENGAGEMENT PLAN: [Stakeholder engagement plan is prepared as the basis for proposal submission. The managing and implementing entity of the PFB program will check the suitability and conformity of the stakeholder engagement plan with the needs of the Activity and PFB program, or an update is required.]	
	ACTIVITY GRIEVANCE MECHANISM: [Prepare, adopt, maintain, and implement grievance redress mechanism, as described in the E&S Safeguards Form/ SEP.]	

Annex 8. Introduction to Supplementary ESIA

This Annex establishes the requirements for the preparation of a Supplementary Environmental and Social Impact Assessment (Supplementary ESIA) under the PFB Environmental and Social Management System (ESMS). A Supplementary ESIA shall be prepared for Activities classified as Substantial or High risk where gaps are identified between the applicable Government of Indonesia (GoI) environmental and social regulatory instruments and the Environmental and Social Standards (*Standar Lingkungan dan Sosial* – SLS) adopted under the PFB framework.

The Supplementary ESIA does not replace or duplicate GoI-approved environmental documentation. It shall complement the instruments by addressing identified gaps and ensuring that the assessment and management of environmental and social risks and impacts are fully aligned with the requirements and objectives of the SLS.

1. Purpose and Scope

The purpose of the Supplementary Environmental and Social Impact Assessment (Supplementary ESIA) is to provide additional environmental and social analysis necessary to ensure that PFB-funded Activities meet the requirements of the Environmental and Social Standards (*Standar Lingkungan dan Sosial* – SLS). The Supplementary ESIA builds upon the applicable Government of Indonesia (GoI) environmental documents (e.g., AMDAL, UKL-UPL, or equivalent) by addressing identified gaps in the assessment and management of environmental and social risks and impacts.

The scope of the Supplementary ESIA is proportionate to the nature and significance of the identified gaps and may include, as relevant, enhanced assessment of social risks, impacts on vulnerable groups, biodiversity considerations, cumulative impacts, and other thematic aspects required under the SLS.

2. Applicability and Triggers

A Supplementary ESIA shall be required for an Activity classified as Substantial or High environmental and social risk under the ESMS where a gap is identified between the applicable Government of Indonesia (GoI) environmental instrument and the requirements of the Environmental and Social Standards (*Standar Lingkungan dan Sosial* – SLS).

The need for a Supplementary ESIA shall be determined through the E&S screening and risk classification process, including a gap analysis of the relevant GoI environmental documentation (e.g., AMDAL, UKL-UPL, or equivalent) against the applicable SLS requirements.

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The tables below present an indicative comparison between the Government of Indonesia (GoI) environmental instruments (AMDAL and UKL-UPL) and the SLS. The comparison highlights typical areas where gaps may arise in relation to the scope, depth, and integration of environmental and social risk assessment and management.

The actual scope and content of a Supplementary ESIA shall be determined based on the activity-specific gap analysis conducted under the ESMS and shall be proportionate to the nature and significance of the identified gaps.

The table below presents indicative conditions that may trigger the need for a Supplementary ESIA where the existing GoI environmental documentation does not sufficiently address the identified environmental and social risks in line with the applicable SLS.

Table 1. Indicative Gaps in AMDAL and UKL-UPL to be complemented by Supplementary ESIA

Indicative Trigger Condition	Typical Limitation in AMDAL	Typical Limitation in UKL-UPL	Implication for Supplementary ESIA
The Activity may affect sensitive biodiversity areas, critical habitats, or areas of high ecological value.	Biodiversity assessed but may not apply SLS concepts such as critical habitat, biodiversity hierarchy, or no-net-loss principles.	Biodiversity assessment is typically limited in scope and depth.	Supplementary ESIA is required to assess biodiversity risks in accordance with SLS.
The Activity may cause significant land acquisition, physical displacement, economic displacement, or livelihood disruption.	Land impacts assessed, but livelihood restoration and economic displacement may not be evaluated against SLS standards.	Assessment of livelihood impacts generally limited.	Supplementary ESIA is required to assess displacement and livelihood risks consistent with SLS.
The Activity may generate indirect or cumulative impacts due to nearby, planned, or interrelated developments.	Cumulative and indirect impacts may not be systematically analyzed.	Cumulative impacts are generally not assessed.	Supplementary ESIA is required to assess indirect and cumulative impacts proportionate to risk.
The Activity may disproportionately affect vulnerable groups.	Vulnerable groups may not be explicitly identified or analyzed in terms of differentiated impacts.	No specific requirement to assess impacts on vulnerable groups.	Supplementary ESIA is required to assess differentiated impacts and define appropriate mitigation measures.

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Indicative Trigger Condition	Typical Limitation in AMDAL	Typical Limitation in UKL-UPL	Implication for Supplementary ESIA
The Activity presents SEA/SH or GBV-related risk	SEA/SH risks are not typically assessed as a standalone risk category	Not assessed.	Supplementary ESIA is required to identify and assess SEA/SH risk consistent with SLS.
The Activity presents impacts on indigenous people	Indigenous people may not be explicitly identified or analyzed in terms of differentiated impacts.	Not assessed.	Supplementary ESIA is required to identify the presence of IP and assess risks to IPs consistent with SLS.
The Activity presents significant community health and safety risks (e.g., hazardous materials, reconstruction in dense areas, emergency context).	Community health and safety assessed; however, the scope may not fully align with SLS scope.	Community health and safety risks generally described in limited detail.	Supplementary ESIA required to strengthen assessment and mitigation planning.

3. Consultation and Disclosure

Consultation and disclosure under the Supplementary ESIA shall be undertaken in a manner proportionate to the identified gaps and the environmental and social risk profile of the Activity.

Where AMDAL is required for the Activity, consultation for the Supplementary ESIA shall, to the extent practicable, be integrated with the AMDAL consultation process to ensure consistency and avoid unnecessary duplication.

For Activities subject to UKL-UPL or other instruments that do not require public consultation, the need for additional stakeholder engagement shall be assessed in light of identified gaps between GoI requirements and the SLS, particularly where risks relate to affected communities, vulnerable groups, land, biodiversity, or community health and safety.

Consultation, where undertaken, shall aim to:

- Inform stakeholders of identified environmental and social risks and impacts;
- Obtain relevant inputs to refine risk identification and mitigation measures; and
- Ensure that concerns of affected or vulnerable groups are appropriately considered.

The Supplementary ESIA, or a summary thereof, shall be disclosed in an appropriate and accessible manner, consistent with national regulations and SLS 10, considering the needs of

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affected communities and vulnerable groups. In emergency contexts, consultation may be conducted in a simplified or phased manner, provided that meaningful engagement is maintained, and appropriate disclosure is ensured.

Any stakeholder engagement conducted as part of the Supplementary ESIA shall be linked to the Activity-level grievance mechanism, ensuring that affected stakeholders are informed of and able to access available complaint and feedback channels.

4. Indicative Content and Scope of Supplementary ESIA

The Supplementary ESIA shall include the analysis and documentation necessary to address the identified gaps between the applicable GoI environmental instrument and the SLS. The scope of analysis shall focus on environmental and social aspects that are not adequately addressed in the applicable GoI environmental documentation, and shall not duplicate assessments already have undertaken to a level consistent with the SLS

The scope and level of detail shall be proportionate to the nature and significance of the identified environmental and social risks and impacts and shall avoid duplication of information adequately addressed in the applicable GoI environmental documentation.

Subject to the identified gaps and risk profile of the Activity, the Supplementary ESIA shall include, as relevant:

a. Executive Summary

A concise summary shall be prepared outlining:

- A brief description of the Activity and its context;
- The Activity risk classification based on the screening process;
- Justification for requiring Supplementary ESIA and significant gaps identified between GoI instruments and the SLS;
- Key environmental and social risks and impacts to be assess in the ESIA;
- Principal mitigation and management measures required; and
- Any material implications for PFB financing decisions, including key proponent E&S commitments, to be incorporated into the ESMP and the Proponent Environment and Social Commitment.

The Executive Summary should enable decision-makers to clearly understand the critical issues and required actions.

b. Legal, Policy, and Institutional Framework Analysis

The applicable legal and institutional framework shall be analyzed, including relevant national requirements and the applicable SLS provisions. The Analysis should cover:

- Overview of the applicable Indonesian legal and regulatory framework relevant to PFB-financed activities across pre-disaster and post-disaster phases.
- Overview of the SLS requirements.
- Identification of gaps between national regulations and SLS requirements and assess the implications of such gaps for risk management and compliance.
- Environmental and social requirements of any co-financiers, where applicable.

c. Activity Description

The Activity shall be described in sufficient detail to support risk assessment, including:

- Typology of activity (e.g., infrastructure, rehabilitation and reconstruction, community-based recovery, nature-based solutions, service delivery).
- Geographic, environmental, social, and temporal context;
- Primary suppliers, where relevant;
- Areas potentially affected by direct, indirect, and cumulative impacts; and
- Institutional arrangement in implementing the Activity.

d. Environmental and Social Risk and Impact Identification (including scoping)

The Supplementary ESIA shall include a systematic identification of environmental and social risks and impacts. The identification process shall:

- Build upon the findings of the initial screening and risk classification, including previously identified gaps between applicable GoI environmental instruments and the SLS.
- Use the screening findings as a starting point, while undertaking a more detailed and refined identification as the Activity design and technical parameters are further developed.
- Consider Activity-specific characteristics and contextual factors that may influence the nature and extent of potential impacts, including, as relevant:
    - sensitive environmental or social receptors;
    - vulnerable groups;
    - environmental or social conditions that may be exacerbated by the activity; and
    - existing or planned developments that may give rise to indirect or cumulative impacts;

- Define the scope of environmental and social issues to be further analyzed in the impact assessment.
- Determine whether thematic studies are required (e.g., biodiversity, land acquisition and resettlement, community health and safety, indigenous people, or other topic-specific assessments) to adequately address identified risks and gaps.
- Determine the baseline information requirements necessary to support a robust and proportionate impact assessment.
- Be updated where new or additional information becomes available during Activity preparation or implementation, to ensure continued alignment with the SLS.

e. Environmental and Social Baseline

The Supplementary ESIA shall summarize and analyze the key environmental and social baseline conditions and include a discussion of the accuracy, reliability, and sources of the data and key data gaps and uncertainties associated with predictions.

Baseline information should be sufficient to establish pre-Activity conditions and relevant to decisions about activity's location, design, operation, or mitigation measures. This also takes into account current and proposed development activities within the activity area but not directly connected to the activity. The level of detail shall be proportionate to the risk and support a robust assessment of potential impacts.

f. Environmental and Social Risk and Impact Assessment

The Supplementary ESIA shall include a structured assessment of the significance of identified environmental and social risks and impacts. The assessment shall:

- Evaluate the significance of impacts, taking into account likelihood, magnitude, duration, reversibility, and the sensitivity of affected receptors;
- Apply clearly defined and transparent criteria for determining impact significance, consistent with the SLS;
- Assess direct, indirect, and cumulative impacts, as relevant;
- Reassess impacts following the development of mitigation measures to determine residual impacts and their acceptability;
- Consider uncertainties, assumptions, and limitations in data or predictive methods;

g. Mitigation and Management Measures

The Supplementary ESIA shall define mitigation and management measures necessary to address the identified environmental and social risks and impacts that are not

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adequately covered in the applicable GoI environmental documentation. The measures shall:

- Be developed in accordance with the mitigation hierarchy (avoid, minimize, mitigate, offset);
- Be proportionate to the significance of the identified impacts and feasible within the context of the Activity;
- Include differentiated mitigation measures, where relevant, to prevent or minimize disproportionate adverse impacts on vulnerable groups, taking into account their specific needs and circumstances.
- Include appropriate monitoring arrangements to track the implementation and effectiveness of mitigation measures, with defined responsibilities and reporting requirements.

The mitigation and management measures planned shall be incorporated into the ESMP and reflected in the proponent's environmental and social commitments.

h. Analysis of Alternatives

The Supplementary ESIA shall briefly document the alternatives considered during Activity preparation and explain the rationale for selecting the preferred alternative. This includes comparing feasible alternatives to the proposed activity site, technology, design, and operation, including the "without activity" situation, in terms of their potential environmental and social impacts, as available. Key environmental and social considerations shall be summarized to demonstrate how the selected option was justified.

i. Appendices

- List of individuals and organizations involved in ESIA preparation.
- References and data sources.
- Records of stakeholder engagement, consultations, and surveys.
- Screening and risk classification result
- Impact assessment tables and significance matrices.
- List of thematic studies and assessment prepared in support of Supplementary ESIA (e.g., Biodiversity Assessment/Critical Habitat Assessment, Risk and Hazard Assessment, SEA/SH Risk Assessment, etc.).

5. Review and Verification

The Supplementary ESIA is reviewed by BNPB through the PFB assessment and verification process (please see Chapter 4 Sub Chapter 4.1.2.). The purpose of this review is to confirm that

the Supplementary ESIA adequately addresses identified gaps between applicable GoI environmental instruments and the SLS and that the Activity meets the environmental and social requirements of the ESMS. The review shall verify, at a minimum, that:

1. the proposed activity has prepared environmental documents in accordance with applicable national regulations;
2. the scope, analysis and conclusion of the Supplementary ESIA is consistent with the identified environmental and social risks and impacts under the ESMS; and
3. the mitigation and management measures are proportionate, feasible, and aligned with the mitigation hierarchy.

Based on this review, BNPB will issue a review and verification report statement summarizing the outcome of the environmental and social document review. This verification forms part of the PFB decision-making process and to confirms whether the environmental and social documentation is considered adequate and acceptable for PFB financing.

6. Integration of the ESIA with Activity Implementation

The environmental and social risk and impact assessed in the Supplementary ESIA, together with the corresponding mitigation and management measures shall be integrated into the implementation framework of the Activity under the ESMS to ensure that these risks and impacts are effectively managed.

In particular, the measures shall be reflected in Environmental and Social Management Plans (ESMP).

7. Thematic Studies

Where necessary, the Supplementary ESIA may be supported by thematic studies to provide a more detailed assessment and technically robust assessment of specific environmental and social risks and impacts. The need for such studies may arise not only from the screening and risk classification process, but also during the process (identification, scoping and assessment) of Supplementary ESIA where particular issues are found to require deeper analysis.

Thematic studies shall be applied selectively and proportionately, taking into account the nature, scale, location, and risk level of the Activity. Such studies shall inform activity design and the result shall be integrated into the ESMP and other relevant ESMS instruments, as appropriate. Thematic studies may include, but are not limited to:

- Risk and Hazard Assessment (see Annex 11)

- Biodiversity Studies (see Annex 12)
- SEA/SH and GBV Risk Assessment (see Annex 13)
- Land Due Diligence (see Annex 15)
- Indigenous Peoples Studies (see Annex 16)

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Annex 9. Introduction to Environmental and Social Management Plan (ESMP)

This Annex describes the Environmental and Social Management Plan (ESMP) for Activities requiring a Supplementary ESIA under the PFB ESMS. The ESMP translates the assessed environmental and social risks, impacts, and mitigation measures identified in the Supplementary ESIA into actionable management and monitoring measures. It ensures that Activity implementation aligns with the applicable SLS and relevant GoI regulatory requirements.

1. Purpose and Scope

The purpose of the ESMP is to operationalize the outcomes of the Supplementary ESIA by defining specific mitigation, monitoring, and institutional measures to be implemented during Activity preparation and implementation.

The ESMP:

- Translates assessed environmental and social risks and impacts into enforceable management actions;
- Ensures alignment with SLS requirements and applicable GoI regulations;
- Provides the basis for institutional arrangements, monitoring responsibilities, and reporting procedures;
- May incorporate thematic management plans where relevant (e.g., biodiversity, community health and safety, land acquisition).

The level of detail and scope of the ESMP is proportionate to the significance of the identified risks and the nature of the Activity.

2. Applicability and Triggers

An ESMP is prepared for Activities requiring a Supplementary ESIA under the PFB ESMS. A Supplementary ESIA is triggered where an Activity is classified as Substantial or High environmental and social risk and where identified risks, impacts, or management gaps are not adequately addressed through existing Government of Indonesia (GoI) environmental instruments. In such cases, the ESMP is developed based on the findings of the Supplementary ESIA and forms an integral part of the overall environmental and social assessment package, although it may be presented as a separate document for implementation purposes.

3. Stakeholder Engagement and Disclosure

The ESMP shall be conducted as an integral part of, and in alignment with, the consultation and disclosure process undertaken for the supplementary ESIA, ensuring that mitigation and management measures are communicated effectively to affected communities and stakeholders. Where stakeholder engagement is relevant to the implementation of mitigation and management measures, the ESMP shall:

- Describe how affected communities and vulnerable groups will be consulted and informed regarding relevant mitigation measures;
- Include arrangements for disclosure of the ESMP or relevant summaries in an accessible manner; and
- Establish an accessible grievance mechanism to enable stakeholders to raise concerns related to the Activity's environmental and social management measures.

Engagement and disclosure of activities shall be proportionate to the nature and significance of identified risks and impacts and shall be implemented in a manner that supports meaningful participation and timely feedback.

4. Indicative Content of ESMP

The ESMP, prepared under the PFB ESMS, provides a structured framework to implement the mitigation and management measures identified in the Supplementary ESIA. It establishes institutional arrangements, specifying roles and responsibilities for implementation, monitoring, and reporting. Adaptive management mechanisms, periodic audits, and reporting to senior management are included to ensure effective execution. Where appropriate, capacity development and training are incorporated within the implementation arrangements to support responsible parties in fulfilling their obligations.

a. Mitigation

The ESMP shall set out the mitigation measures for each environmental and social risk and impact assessed under the Supplementary ESIA. The mitigation measures should (i) describes, with technical details, each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate.; (ii) takes into account, and be consistent with, other mitigation plans required for the activity/project (e.g., for involuntary resettlement, indigenous peoples, or cultural heritage). Differentiated measures may

be included where necessary to avoid or minimize disproportionate adverse impacts on vulnerable groups.

b. Monitoring

The ESMP shall set out a monitoring plan with clear objectives and approach to monitoring, directly linked to the identified environmental and social risks and mitigation measures. The plan should provide specific technical details of monitoring measures including, but not limited to:

- Indicators (parameters to measures),
- Methods to be used,
- Sampling location,
- Frequency of measurements,
- Detection limits (where applicable), and
- Thresholds or triggers to guide corrective actions and adaptive management.

The monitoring plan should also set out monitoring and reporting procedures, such as periodic E&S reporting to management (which may include BNPB or relevant government authorities, as applicable), record keeping, audit mechanisms, and periodic review and update of the monitoring plan to reflect adaptive management needs.

c. Capacity/Institutional Arrangement

The ESMP shall provide a clear and specific description of institutional arrangements, identifying which party is responsible for implementing each mitigation and monitoring measure (e.g., contractor or specific agencies/institution involved in the activity). Responsibilities may include, as relevant: operation, supervision, enforcement, monitoring of implementation, remedial actions, financing, reporting, and staff training.

Where appropriate, the ESMP may also include capacity development or training measures to ensure personnel have the necessary skills and knowledge to carry out their responsibilities effectively. Such measures should be proportionate to the environmental and social risks identified in the Supplementary ESIA and aligned with the institutional arrangements defined in the ESMP.

d. Implementation Schedule

For mitigation, monitoring, and capacity development measures, the ESMP shall provide an implementation schedule, indicating the timing, phasing, and coordination of each measure with the overall project/activity implementation plan. The ESMP should also consider capital and

recurrent costs and their potential sources of funds for implementing the ESMP. Where relevant, these cost considerations may be integrated into the total activity/project cost tables to ensure that environmental and social management measures are adequately planned and resourced.

5. Integration of the ESMP with Activity Implementation

The ESMP shall be implemented through mechanisms that ensure its measures are effectively integrated into activity planning, design, procurement, contracting, budgeting, and supervision processes. The commitments set out in the ESMP shall be aligned with contractual arrangements (e.g. with sub-contractors and providers) and supervisory mechanisms to ensure that environmental and social requirements are consistently applied throughout activity implementation. The measures shall also be reflected in Proponent Environmental and Social Commitment under this ESMS.

6. Review and Verification

ESMP is reviewed by BNPB through the PFB assessment and verification process (please see Chapter 4 Sub Chapter 4.1.2). The purpose of this review is to ensure that the ESMP adequately addresses the environmental and social risks and impacts assessed in the Supplementary ESIA and the proposed measures are consistent with the SLS. The review shall verify, at a minimum, that:

- the mitigation and management measures set out in the ESMP are proportionate, feasible, and aligned with the mitigation hierarchy; and
- institutional arrangements and responsibilities for implementing and monitoring these measures are clearly defined.

Based on this review, BNPB will issue a review and verification report summarizing the outcome of the ESMP assessment. This verification forms part of the PFB decision-making process and confirms whether the ESMP is considered adequate and acceptable to support implementation of the environmental and social management measures for the Activity.

7. Thematic Management Measures

Where required, the ESMP may be supported by thematic management plans that translate the result of thematic assessments into specific, actionable, and enforceable mitigation, management, and monitoring measures. Thematic management plans are integrated into the ESMP and other relevant ESMS instruments, as appropriate.

Such plans may include, but are not limited to:

- Biodiversity Management Plan (see Annex 12),

- SEA/SH Action Plan (see Annex 13),
- Stakeholder Engagement Plan (see Annex 14),
- Indigenous Peoples Planning Framework - IPPF (see Annex 16),
- Traffic Management Plan

  The Traffic Management Plan (TMP) needs to be prepared to identify, assess, and manage traffic-related impacts associated with activities. It addresses potential risks to road safety, local communities, sensitive receptors, and the environment, and sets out measures to avoid, minimize, or mitigate adverse impacts.

  In general, TMP is required when activities are expected to:

  - Significantly increase traffic volumes on public roads, access routes, or within activity/project sites;
  - Affect vulnerable road users or local communities;
  - Require transport of hazardous or sensitive materials; or
  - Potentially generate cumulative traffic impacts in combination with other developments.

  Where an Activity is required by the relevant authority to prepare a Traffic Impact Assessment (TIA)/*Analisis Dampak Lalu Lintas* (ANDAL LALIN), the data, assessments, and recommendations arising from the ANDAL LALIN may serve as inputs to the TMP. The TMP shall be aligned with the requirements, mitigation measures, and traffic management arrangements stipulated in the approved ANDAL LALIN.

  For low-traffic activities or where existing GoI regulations and traffic management guidelines are sufficient, TMP measures may be integrated into existing environmental documentation (e.g., UKL-UPL) without a separate plan.

  Indicative outline of TMP is as follow:

  - Traffic Impact Assessment – evaluate baseline traffic conditions and identify potential impacts (this could be part of ESIA).
  - Mitigation Measures – define measures to reduce traffic-related risks (e.g., route planning, scheduling of transport, signage, speed limits, community awareness).
  - Monitoring & Reporting – specify how traffic impacts will be monitored, indicators, frequency, and reporting mechanisms.
  - Institutional Arrangement – assign responsibilities for TMP implementation, supervision, and enforcement.
  - Integration with ESMP – ensure traffic impact measures are incorporated into the overall ESMP and activity implementation framework.

- Waste Management Plan (including management plan for Hazardous and Toxic Waste or Medical Waste and Electronic Waste)

  Waste management plan needs to be prepared when Activity involves large-scale construction activities, major renovation activities, potentially generates significant volume of hazardous and toxic waste (including medical waste and electronic waste), and involves on-site storage or treatment of hazardous and toxic waste. Waste management plan shall be prepared in alignment with SLS 3 and applicable national regulations, and may refer to applicable international standards, e.g., WBG EHS guidelines. Waste management plan provides detailed information on the mechanism and clear arrangements to manage waste (including roles and responsibilities of contractors and subcontractors in managing generated waste), ensuring that waste handling, storage, transport, treatment, and disposal are conducted safely, minimizing risks to human health and the environment. Indicative outline of Waste Management Plan is as follows:

  - Waste Characterization & Assessment – identify types, volumes, and risks of hazardous, medical, and electronic waste
  - Mitigation Measures & Operational Procedures, including:
    (i) Waste streams inventory;
    (ii) Segregation and labeling;
    (iii) Storage (including impermeable surfaces, secondary containment, and signage);
    (iv) Transport (licensed haulers and manifest systems);
    (v) Treatment and disposal (licensed facilities);
    (vi) Training and use of personal protective equipment (PPE);
    (vii) Emergency spill response; and
    (viii) Records and chain of custody.
  - Monitoring & Reporting – establish indicators, frequency, and mechanisms to ensure safe management.
  - Institutional Arrangement – assign responsibilities for implementation, supervision, and compliance verification.
  - Integration with ESMP – ensure Waste Management Plan measures are reflected in the overall ESMP and project/activity implementation framework.

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Annex 10. Environmental and Social Codes of Practices (ESCOPs)

How to Use

The Environmental and Social Codes of Practices (ESCOPs) are standardized good practice guidelines, adopting relevant national E&S regulations and EHS WBG Guidelines[48], and are intended to translate the results of E&S screening into practical, site-level measures for managing environmental and social risks and impacts associated with the Activities. ESCOPs are developed considering groups of activities presented in Chapter 2 and may be adapted or tailored to the specific scope and context of activities.

ESCOPs applied as a guidance for PVE Team and proponents to manage E&S risks and impacts for all risk categories and encouraged to be referred in the development of national environmental documents (e.g., SPPL, UKL-UPL, and AMDAL) and do not replace the need for national permitting instruments (such as SPPL, UKL–UPL, or AMDAL) or more comprehensive E&S instruments (such as Supplementary ESIA or ESMP).

Table 1. Environmental and Social Codes of Practices

PART 1: ENVIRONMENTAL /SOCIAL IDENTIFICATION			
Will the site activity include/involve any of the following potential issues and/or impacts:	Activity and examples of potential issues and/or impacts	Status If Yes for any	Additional references
	1. Building/infrastructure rehabilitation (e.g., dam rehabilitation) a. OHS risk for construction workers b. Community Safety Risk due to increased traffic and use of heavy equipment. c. Increase in dust and noise from demolition and/or construction d. Use of hazardous or toxic material e. Waste generation f. Risk of damage to known/unknown historical or archaeological sites	[ ] Yes [ ] No	See Section A under Part 2 below

[48] EHS WBG Guidelines

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PART 1: ENVIRONMENTAL /SOCIAL IDENTIFICATION			
	g. Medical waste generated from the operation of rehabilitated health service facilities h. SEA/SH risks i. Social tension from negative impacts to community		
	2. Small-scale construction/specialized infrastructure installation (e.g., installation of evacuation signs, early warning system etc) a. OHS risk for construction workers b. Use of land for the proposed activity c. Waste generation d. Risk of damage to known/unknown historical or archaeological sites e. SEA/ SH risks f. Social tension from land disputes or other negative impacts to community	[ ] Yes [ ] No	See Section B under Part 2 below
	3. Medium to large construction (e.g., construction of ports, dams, reservoirs etc) a. OHS risk for construction workers b. Use of land for the proposed activity c. Biodiversity disruption due to land clearing d. Soil erosion and increase sediment loads in water receptors e. Community safety risk due to increased traffic and use of heavy equipment f. Increase in dust and noise from demolition and/or construction g. Waste generation h. Use of hazardous and toxic material i. Disruption on water supply due to water withdrawal j. Water and soil pollution due to wastewater discharge k. Risk of damage to known/unknown historical or archaeological sites l. SEA/SH risks m. Social tension from land disputes or other negative impacts to community	[ ] Yes [ ] No	See Section C under Part 2 below

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PART 1: ENVIRONMENTAL /SOCIAL IDENTIFICATION			
	4. Development of regulations/provisions, and capacity building (e.g., preparation of contingency plan etc) a. Potential threat to OHS b. SEA/SH risks c. Social tension resulted from discrimination, limited consultation and engagement of the stakeholders, including exclusion of affected vulnerable groups, and IPs where relevant	[ ] Yes [ ] No	See Section D under Part 2 below
	5. Vegetation planting (e.g., rehabilitation of river basins through vegetation) a. Disturbances or degradation of any sensitive natural habitats or protected area due to introduction of invasive species; clearing or removal of existing native vegetation; displacement of wildlife from their natural habitats; increased noise, vibration, or human presence particularly during wildlife breeding or migration seasons b. Soil and water pollution due to excessive utilization and spillage of chemical substances, including pesticides c. Occupational health and safety risk caused by handling of chemical substance and/or waste	[ ] Yes [ ] No	See Section E under Part 2 below
	6. Provision of goods and tools for pre- and post-Disaster Activities (e.g., fulfilment of logistics and equipment needs for preparedness) a. Waste generation (packaging, unused goods) b. OHS risk of personnel handling the tools and goods c. Hazardous material (medical, chemical, fuel) d. Social tension resulted from inequitable targeting and exclusion	[ ] Yes [ ] No	See Section F under Part 2 below

PART 2: MITIGATION PLAN		
ACTIVITY	**PARAMETER**	**GOOD PRACTICES MITIGATION MEASURES CHECKLIST**
Building Rehabilitation	OHS Risk	• Conduct Risk and Hazard Assessment, especially for medium to large infrastructure rehabilitation activity. • Parties supporting the activity （staff members/facilitator） shall be trained on emergency response in advance. • Understand the importance of HSE and implement the occupational health and safety (OHS) by carrying out preventive measures through avoidance and management of hazards to minimize risks, to include (i) ensuring that the supporting parties （staff members/facilitators） are in good health; (ii) avoiding placement of hazardous installation at vulnerable place; and (iii) assign personnel with appropriate expertise in implementing activities. • Health protocol is implemented to prevent prevalence of diseases to parties supporting the activities （staff members/facilitator). • Evacuation routes and gathering points are available in the event of an emergency requiring rapid evacuation. • Fire extinguisher (APAR) and first aid kits are available for easy access. • Easy access to clean water and sanitation is available in the location used for the activities. • Facilities are available to accommodate the needs of parties supporting the activities (staff members/facilitators who are categorized as vulnerable groups). • Facility designs: fire safety and universal access requirements apply to public facing buildings; emergency egress, fire detection, suppression, and accessibility features are consistent with WBG EHS Guidelines.
	Community Safety Risk	• Sign posting, warning signs, barriers, and traffic diversions: site will be clearly visible, and the public warned of all potential hazards. • Provision of safe passages and crossings for pedestrians where construction traffic interferes. • Active traffic management by trained and visible staff at the site, if required for safe and convenient passage for the public

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PART 2: MITIGATION PLAN		
ACTIVITY	**PARAMETER**	**GOOD PRACTICES MITIGATION MEASURES CHECKLIST**
		• Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement. • Ensuring safe and continuous access to office facilities, shops, and residences during renovation activities, if the buildings stay open for the public.
	Air pollution	• During interior demolition use debris-chutes above the first floor and keep demolition debris in controlled area. • Suppress dust during pneumatic drilling/wall destruction by ongoing water spraying and/or installing dust screen enclosures at site. • Prohibition of open burning of construction / waste material at the site. • Prohibition of excessive idling of construction vehicles at sites.
	Noise	• Construction activity will be limited during night time and carried out in accordance with the activity permit and/or as agreed with communities. • During operations the engine covers of generators, air compressors and other powered mechanical equipment should be closed, and equipment placed as far away as possible from residential areas to minimize noise impacts on nearby communities. • Where feasible, install temporary noise barriers or acoustic enclosures for stationary equipment operating near sensitive receptors (schools, hospitals, residences).
	Use of hazardous and toxic material	• Develop ERP for hazardous material. • Provision of MSDS and JSA for hazardous material handling. • The use of appropriate PPE for hazardous material handling. • Hazardous material should be contained in a safe container labeled with details of composition, properties, and handling information; and stored in a designated bunded area with an impermeable floor and adequate secondary containment. • Asbestos-containing materials (ACM) shall not be used in rehabilitation activities. If asbestos-containing materials (ACM) are identified during

PART 2: MITIGATION PLAN		
ACTIVITY	**PARAMETER**	**GOOD PRACTICES MITIGATION MEASURES CHECKLIST**
		rehabilitation works, they shall be handled by trained personnel using appropriate containment, personal protective equipment (PPE), and controlled removal methods.
	Waste Generation	• All waste generated from the activity, including construction and domestic waste, shall be segregated at source. At a minimum, waste shall be classified into hazardous and non-hazardous categories, with non-hazardous waste further separated into organic and non-organic streams, where practicable. Hazardous waste shall be further segregated according to waste streams and characteristics (e.g., ACM waste, e-waste, used oil, batteries, chemicals) and managed in accordance with applicable regulations. • Asbestos-Containing Material (ACM) waste shall be securely packaged, labeled, transported, and disposed of in a manner that prevents fiber release and exposure to workers and the community. Asbestos prior removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust. • Electronic waste (e-waste), including discarded electrical and electronic equipment and components, shall be stored separately from other hazardous waste, handled to prevent breakage and release of hazardous substances, and transferred only to licensed recyclers or disposal facilities in accordance with applicable regulations. • Hazardous waste should be contained in a secured container, labeled, and stored in a designated bunded area with an impermeable floor and adequate secondary containment. • Hazardous waste shall only be collected, transported and disposed of by a licensed party. • The records of waste disposal will be maintained as evidence for proper management as per planned. • Whenever feasible the contractor will reuse and recycle appropriate and viable materials (except asbestos).
	Cultural Heritage	• If the building is a designated historic structure, very close to such a structure, or located in a

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PART 2: MITIGATION PLAN		
ACTIVITY	**PARAMETER**	**GOOD PRACTICES MITIGATION MEASURES CHECKLIST**
		designated historic district, notify, and obtain approval/permits from local authorities and address all construction activities in line with local and national legislation. • Apply chance find procedures. Ensure that provisions are put in place so that artifacts or other possible "chance finds" encountered in excavation or construction are noted, officials contacted, and works activities delayed or modified to account for such finds.
	Medical Waste form rehabilitated health service facilities	In compliance with national regulations the proponent will ensure that rehabilitated health care facilities include sufficient infrastructure for medical waste handling and disposal; this includes and not limited to: • Special facilities for segregated healthcare waste (including soiled instruments "sharps", and human tissue or fluids) from other waste disposal: a. Clinical waste: yellow bags and containers b. Sharps – Special puncture resistant containers/boxes. c. Domestic waste (non-organic): black bags and containers. • Appropriate storage facilities for medical waste are in place. If the activity includes on-site or facility-based waste treatment, appropriate and operational final disposal arrangements shall be in place.
	SEA/SH Prevention and Mitigation	Apply SEA/SH Risk Management as described in Annex 13 that include: • Codes of Conduct for all personnel and contractors related to respectful workplace, including commitment to prevent SEA/SH. • Proponent to implement prevention of SEA/SH, including establishment of accessible, confidential, and survivor-centered grievance redress mechanisms. • Basic SEA/SH awareness raising and training for staff, workers, and relevant stakeholders. • Mapping and dissemination of SEA/SH survivor services

PART 2: MITIGATION PLAN		
ACTIVITY	**PARAMETER**	**GOOD PRACTICES MITIGATION MEASURES CHECKLIST**
	Stakeholder engagement	Apply principles of meaningful stakeholder engagement as described in Chapter 8 Stakeholder Engagement Framework that include: • Affected stakeholders are identified and engaged throughout the activity cycle. • Mass-gathering projects/ activities are carried out in a non-discriminatory, accountable, transparent manner and uphold equality and gender mainstreaming. • Information related to project activities is disclosed in a timely, transparent, and culturally appropriate manner, ensuring accessibility for vulnerable groups. • Functioning and accessible GRM is available and documented.
A. Small-scale new construction/specialized infrastructure installation	OHS risk of workers	• Conduct Risk and Hazard Assessment, as applicable • Ensure the provision and use of PPE that comply with national regulations and international good practice, including when handling hazardous material (eg: use safety helmet, as needed masks and safety glasses, full body harness and safety boots, etc) • Incident / accident reporting mechanism in place • Provision of accessible grievance mechanism for workers
	Use of land for the proposed activity	Apply Land Due Diligence as described in Annex 15 that include: • The proponent shall ensure the provision of land is clean and clear, and there are no land-dependent peoples. • Ensure that there are no land disputes and all related impacts have been mitigated • Consultation with affected parties is conducted and consent is obtained from IPs if the land is located in IP areas
	Waste generation	• All waste generated from the activity, including construction and domestic waste, shall be segregated at source. At a minimum, waste shall be classified into hazardous and non-hazardous categories, with non-hazardous waste further separated into organic and non-

PART 2: MITIGATION PLAN		
ACTIVITY	**PARAMETER**	**GOOD PRACTICES MITIGATION MEASURES CHECKLIST**
		organic streams, where practicable. Hazardous waste shall be further segregated according to waste streams and characteristics (e.g., ACM waste, e-waste, used oil, batteries, chemicals) and managed in accordance with applicable regulations. • Asbestos-Containing Material (ACM) waste shall be securely packaged, labeled, transported, and disposed of in a manner that prevents fiber release and exposure to workers and the community. Asbestos prior removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust. • Electronic waste (e-waste), including discarded electrical and electronic equipment and components, shall be stored separately from other hazardous waste, handled to prevent breakage and release of hazardous substances, and transferred only to licensed recyclers or disposal facilities in accordance with applicable regulations • Hazardous waste should be contained in a secured container, labeled, and stored in a designated bunded area with an impermeable floor and adequate secondary containment. • Hazardous waste shall only be collected, transported and disposed of by a licensed party. • The records of waste disposal will be maintained as evidence for proper management as per planned. • Whenever feasible the contractor will reuse and recycle appropriate and viable materials (except asbestos).
	Cultural Heritage	• If the small construction is located in cultural heritage areas or very close to such a structure, notify and obtain approval/permits from local authorities and address all construction activities in line with local and national legislation. • Ensure that provisions are put in place so that artifacts or other possible “chance finds” encountered in excavation or construction are

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PART 2: MITIGATION PLAN		
ACTIVITY	**PARAMETER**	**GOOD PRACTICES MITIGATION MEASURES CHECKLIST**
		noted, officials contacted, and works activities delayed or modified to account for such finds.
	SEA/ SH Prevention and Mitigation	Apply SEA/SH Risk Management as described in Annex 13 that include: • Codes of Conduct for all personnel and contractors related to respectful workplace, including commitment to prevent SEA/SH. • Proponent to implement prevention of SEA/SH, including establishment of accessible, confidential, and survivor-centered grievance redress mechanisms. • Basic SEA/SH awareness raising and training for staff, workers, and relevant stakeholders. • Mapping and dissemination of SEA/SH survivor services.
	Stakeholder engagement	Apply principles of meaningful stakeholder engagement as described in Chapter 8 Stakeholder Engagement Framework that include: • Affected stakeholders are identified and engaged throughout the activity cycle. • Consultation and engagement activities are carried out in a non-discriminatory, accountable, transparent manner and uphold equality and gender mainstreaming. • Information related to project activities is disclosed in a timely, transparent, and culturally appropriate manner, ensuring accessibility for vulnerable groups. • Functioning and accessible GRM is available and documented. Engagement with IPs based on Annex 16 IPPF
B. Medium to large new construction	OHS risk for construction workers	• Conduct Risk and Hazard Assessment, as applicable • Parties supported the activity （staff members/facilitators） are trained on emergency response in advance. • Understand the importance of HSE and implement the occupational health and safety (OHS) by carrying out preventive measures through avoidance and management of hazards to minimize risks, to include (i) ensuring that the

PART 2: MITIGATION PLAN		
ACTIVITY	**PARAMETER**	**GOOD PRACTICES MITIGATION MEASURES CHECKLIST**
		supporting parties （staff members/facilitators ） are in good health; (ii) avoiding placement of hazardous installation at vulnerable place; and (iii) assign personnel with appropriate expertise in implementing activities. • Health protocol is implemented to prevent prevalence of diseases to parties supporting the activities (staff members/facilitator). • Evacuation routes and gathering points are available in the event of an emergency requiring rapid evacuation. • Fire extinguisher (APAR) and first aid kits are available for easy access. • Easy access to clean water and sanitation is available in the location used for the activities. • Facilities are available to accommodate the needs of parties supporting the activities (staff members/facilitator who are categorized as vulnerable groups. • Facility designs: fire safety and universal access requirements apply to public facing buildings; emergency egress, fire detection, suppression, and accessibility features are consistent with WBG EHS Guidelines.
	Use of Land	Apply Land Due Diligence as described in Annex 15 that include: • The proponent shall ensure the provision of land is clean and clear, and there are no land-dependent peoples. • Ensure that there are no land disputes and all related impacts have been mitigated • Consultation with affected parties is conducted and consent is obtained from IPs if the land is located in IP areas
	Biodiversity disruption due land clearing	• If the activity will be conducted near or at natural forest, a biodiversity screening must be conducted (see Annex 12) to identify the presence of Identify the presence of Key Biodiversity Areas and Protected and Conserved Areas within and surrounding the proposed activity locations.

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		• Conduct identification of potential risk of impact upon the ecosystem, which include but not limited to Species affected, Ecosystem services affected, and Protection status.
	Soil erosion and increased sediment load in water receptors	• Land clearing shall be undertaken progressively, limiting exposed areas and implementing timely reinstatement or revegetation. • Topsoil shall be stripped, stored separately, protected from erosion, and reused for site restoration. • Appropriate erosion and sediment control measures (e.g., silt fences, sediment traps, temporary drainage) shall be installed and maintained throughout construction. • Soil stockpiles shall be located away from watercourses and protected to prevent runoff. • Disturbed areas shall be stabilized as soon as practicable, and erosion control measures shall be regularly inspected and maintained.
	Community Safety Risk	• Sign posting, warning signs, barriers, and traffic diversions: site will be clearly visible, and the public warned of all potential hazards. • Provision of safe passages and crossings for pedestrians where construction traffic interferes. • Active traffic management by trained and visible staff at the site, if required for safe and convenient passage for the public • Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement • Ensuring safe and continuous access to office facilities, shops, and residences during renovation activities, if the buildings stay open for the public
	Air pollution	• During interior demolition use debris-chutes above the first floor and keep demolition debris in controlled area.

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		• Suppress dust during pneumatic drilling/wall destruction by ongoing water spraying and/or installing dust screen enclosures at site. • Prohibition of open burning of construction / waste material at the site. • Prohibition of excessive idling of construction vehicles at sites.
	Noise	• Construction activity will be limited during night-time and carried out in accordance with the activity permit and/or as agreed with communities • During operations the engine covers of generators, air compressors and other powered mechanical equipment should be closed, and equipment placed as far away as possible from residential areas to minimize noise impacts on nearby communities. • Where feasible, install temporary noise barriers or acoustic enclosures for stationary equipment operating near sensitive receptors (schools, hospitals, residences)
	Waste generation	• All waste generated from the activity, including construction and domestic waste, shall be segregated at source. At a minimum, waste shall be classified into hazardous and non-hazardous categories, with non-hazardous waste further separated into organic and non-organic streams, where practicable. Hazardous waste shall be further segregated according to waste streams and characteristics (e.g., ACM waste, e-waste, used oil, batteries, chemicals) and managed in accordance with applicable regulations. • Asbestos-Containing Material (ACM) waste shall be securely packaged, labeled, transported, and disposed of in a manner that prevents fiber release and exposure to workers and the community. Asbestos prior removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust. • Electronic waste (e-waste), including discarded electrical and electronic equipment and

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		components, shall be stored separately from other hazardous waste, handled to prevent breakage and release of hazardous substances, and transferred only to licensed recyclers or disposal facilities in accordance with applicable regulations. • Hazardous waste should be contained in a secured container, labeled, and stored in a designated bunded area with an impermeable floor and adequate secondary containment. • Hazardous waste shall only be collected, transported and disposed of by a licensed party. • The records of waste disposal will be maintained as evidence for proper management as per planned. • Whenever feasible the contractor will reuse and recycle appropriate and viable materials (except asbestos).
	Use of Hazardous and Toxic Material	• Develop ERP for hazardous material. • Provision of MSDS and JSA for hazardous material handling • The use of appropriate PPE for hazardous material handling • Hazardous material should be contained in a safe container labeled with details of composition, properties, and handling information; and stored in a designated bunded area with an impermeable floor and adequate secondary containment. • Asbestos-containing materials (ACM) shall not be used in rehabilitation activities. If asbestos-containing materials (ACM) are identified during rehabilitation works, they shall be handled by trained personnel using appropriate containment, personal protective equipment (PPE), and controlled removal methods.
	Disruption on water supply due to water withdrawal	• Projected water demand shall be identified in advance. • An appropriate water resource assessment shall be conducted, proportionate to the scale and source of abstraction, to confirm availability,

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		sustainability, and safe yield prior to water withdrawal. • Water abstraction shall comply with applicable permits and regulatory requirements. • Potential impacts on existing users and ecosystem services, including communities, agriculture, and livestock/wildlife, shall be assessed, and avoided. • Water sourcing shall be coordinated with relevant authorities and service providers to prevent conflicts and over-extraction. • Particular caution shall be applied in water-scarce or drought-prone areas, where alternative sources shall be prioritized where feasible. • Water efficiency measures shall be implemented, including optimization of treatment systems, rainwater harvesting, and water reuse where technically feasible. • Water consumption shall be monitored and recorded to track abstraction volumes and efficiency indicators.
	Wastewater discharge	• Prior discharge into water receptors, effluents of sanitary facilities must be treated in order to meet the minimal quality criteria set out by national guidelines on effluent and wastewater treatment quality. • Prohibition of direct discharge of untreated wastewater to land, drainage systems, or water bodies.
	Cultural Heritage	When the implementation of activity intersects or has the potential to impact the cultural heritage, the proponent should consider the following aspects: • area used for implementation of projects does not impede community access to cultural heritage sites; • implementation of projects does not coincide with or hinder cultural heritage rituals; • implementation of projects creates no damage to cultural heritage; and • implementation of projects has taken into account local prohibitions related to cultural

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		heritage, based on information obtained from consultation with local communities and stakeholders. In the event of accidental discovery of artifacts or cultural heritage sites during excavation or construction activities, the project proponent must follow applicable procedures, including contacting the local cultural office, adhering to chance find procedures, and temporarily suspending project activities.
	SEA/ SH Prevention and Mitigation	Apply SEA/SH Risk Management as described in Annex 13 that include: • Codes of Conduct for all personnel and contractors related to respectful workplace, including commitment to prevent SEA/SH • Proponent to implement prevention of SEA/SH, including establishment of accessible, confidential, and survivor-centered grievance redress mechanisms. • SEA/SH awareness raising and training for staff, workers, and relevant stakeholders. • Mapping and dissemination of SEA/SH survivor services • Preparation and implementation of a phase-appropriate SEA/SH Action Plan integrated into ESMP or post-disaster planning instruments. • Designation of a SEA/SH focal point or person in charge within the implementing institution. Strengthened monitoring of worksites and program activities.
	Stakeholder Engagement	Apply principles of meaningful stakeholder engagement as described in Chapter 8 Stakeholder Engagement Framework that include: • Affected stakeholders are identified and engaged throughout the activity cycle. • Mass-gathering projects/ activities are carried out in a non-discriminatory, accountable, transparent manner and uphold equality and gender mainstreaming. • Information related to project activities is disclosed in a timely, transparent, and culturally

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		appropriate manner, ensuring accessibility for vulnerable groups. • Functioning and accessible GRM is available and documented. • Engagement with IPs based on Annex 16 IPPF
C. Development of regulations/provisions, and capacity building	OHS Risks	• Implementation of mass gathering programs/activities must consider the capacity of the room used, by taking into account The number of participants and the organizing committee. • Evacuation routes and gathering points are available in the event of an emergency requiring rapid evacuation. • Incident / accident reporting mechanism in place. • Provision of accessible grievance mechanism for workers
	SEA/ SH Prevention and Mitigation	Apply SEA/SH Risk Management as described in Annex 13 that include: • Codes of Conduct for all personnel and contractors related to respectful workplace, including commitment to prevent SEA/SH • Proponent to implement prevention of SEA/SH, including establishment of accessible, confidential, and survivor-centered grievance redress mechanisms. • Basic SEA/SH awareness raising and training for staff, workers, and relevant stakeholders. • Mapping and dissemination of SEA/SH survivor services
	Stakeholder Engagement	Apply principles of meaningful stakeholder engagement as described in Chapter 8 Stakeholder Engagement Framework that include: • Affected stakeholders, especially affected vulnerable groups are identified and engaged throughout the activity cycle. • Consultation and engagement activities are carried out in a non-discriminatory, accountable, transparent manner and uphold equality and gender mainstreaming. • Information related to activities and related materials are disclosed in a timely, transparent,

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		and culturally appropriate manner, ensuring accessibility for vulnerable groups. • Functioning and accessible GRM is available and documented.
D. Vegetation Planting	Biodiversity	When the implementation of activities intersects or has the potential to impact any sensitive natural habitats, either directly or indirectly, the project proponent should consider the following aspects: • Identify the presence of Key Biodiversity Areas and Protected and Conserved Areas within and surrounding the proposed activity locations, in order to identify potential risks and impacts to significant biodiversity, ecosystems and/or habitats. The site selection process must explicitly consider the proximity to and presence of Key Biodiversity Areas and Protected and Conserved Areas with the objective of avoiding any activities that could result in loss, reduction, change, or threat to composition of these areas. • Implementation of activities that may result in the loss, reduction, change, or pose threat to the composition of biodiversity, ecosystems, and/or habitats, specifically the one located within or adjacent to Key Biodiversity Areas and Protected and Conserved Areas, shall be classified as substantial or high Risk, which are considered ineligible for PFB financing. • Involve a botanist or ecologist to better understand the local ecological context and provide guidance on the planning and implementation of vegetation planting activities, including identifying and selecting appropriate plant species, planting strategies, and planting techniques. This includes screening and preventing introduction of potential invasive species, and monitoring of invasive species and its effects to local environment. • Conduct and implement a study to identify and assess potential risks and impacts on biodiversity, ecosystems, and/or habitats, and recommend appropriate avoidance/mitigation measures,

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		including determining the appropriate location, vegetation type, volume, and techniques of vegetation plantings. No fire (slash and burn) for land opening throughout the activities.
	Soil and water pollution due to Hazardous material (chemical) use	• Apply nature-based and non-chemical approaches as the default practice. The routine or preventive use of chemical pesticides is not promoted as part of vegetation planting activities financed by PFB. • Limited use of chemical pesticides may only be considered under exceptional and justified circumstances, such as severe pest outbreaks during the early establishment phase of planting, where non-chemical, biological, mechanical, or physical control measures are demonstrably insufficient. In such cases, pesticide use shall be applied on a conditional and risk-based basis, following a hierarchy of pest management in which chemical control represents the last resort. • Where pesticide use becomes unavoidable, only products that are legally registered and approved by the relevant national authority may be used, excluding substances classified as WHO Class 1a or 1b[49] or otherwise prohibited under Indonesian regulations. • Chemical substance should be contained in safe containers, labelled with details of composition, properties, and handling information; and stored in a designated bunded area with an impermeable floor and adequate secondary containment.
	OHS risk from chemical handling	Pesticides shall be handled, stored, applied, and disposed of by trained personnel using appropriate personal protective equipment (PPE), with due measures to protect water resources, sensitive receptors, and non-target species. Any pesticide use under vegetation planting activities shall be documented and monitored.

[49] WHO Class 1a and 1b refer to pesticide hazard categories defined in The WHO Recommended Classification of Pesticides by Hazard, indicating substances that are extremely or highly hazardous to human health.

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E. Provision and distribution of goods and tools for pre- and post-Disaster Activities	Waste generation	Provision of tools and goods may generate waste from packaging or unused materials. Such waste shall be segregated at source. At a minimum, waste shall be classified into hazardous and non-hazardous categories, with non-hazardous waste further separated into organic and non-organic streams, where practicable.
	OHS risk of personnel handling the tools and goods	• Ensure the provision and use of PPE that comply with national regulations and international good practice, including when handling hazardous material (eg: use safety helmet, as needed masks and safety glasses, full body harness and safety boots, etc.). • Evacuation routes and gathering points are available in the event of an emergency requiring rapid evacuation. • Incident / accident reporting mechanism in place. • Provision of accessible grievance mechanism for workers.
	Hazardous material storage	Hazardous material should be contained in safe containers labeled with details of composition, properties, and handling information; and stored in a designated bunded area with an impermeable floor and adequate secondary containment
	Stakeholder Engagement	Apply principles of meaningful stakeholder engagement as described in Chapter 8 Stakeholder Engagement Framework that include: • Affected stakeholders are identified and engaged throughout the activity cycle. • Provision of good and services are carried out in a non-discriminatory, accountable, transparent manner and uphold equality and gender mainstreaming. • Provision and distribution methods are planned in consultation with affected communities and stakeholders, ensuring inclusion of adjustment needs for vulnerable groups. • Information related to provision of good and services is disclosed in a timely, transparent, and culturally appropriate manner, ensuring assessibility for vulnerable groups.

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		• Functioning and accessible GRM is available and documented.

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Annex 11. Risk and Hazard Assessment

1. Introduction

The Hazard or Risk Assessment (RHA) is a systematic process to identify, analyze, and manage potential hazards and risks related to the presence of dangerous materials and conditions at activity location. RHA is required when an activity has the potential to release toxic, hazardous, flammable or explosive material, or where operations of the activity could result in injury to personnel or public (e.g., dam construction or rehabilitation) as identified by the risks and impacts identification process. This includes emergency events, such as fire, explosions, leaks, or spills.

RHA is applicable for pre- and post- disaster activities and could be conducted either as part of the environmental and social assessment or as a stand-alone activity. RHA follows a risk-based approach, and the level of detail is proportionate to the nature and severity of the identified hazards. Results of RHA could be used to inform ESMP, Hazardous and Toxic Materials and/or Waste Management Plan, or Occupational Health and Safety (OHS) Plan.

2. Procedural Steps

RHA should describe the process for:

- Hazard identification – Identifying hazards and other risk factors that may cause harm, and who may be at risk;
- Analyzing and evaluating the hazards and risks;
- Identifying and implementing the controls necessary to eliminate the hazard or control the risks, at all stages of the activity life cycle;
- Measures to address emergency events and protect those at risk. This includes the development of an Emergency Response Plan (ERP) that will be applicable in the event that hazardous materials or substances may be released as a result of the activity; and
- Coordinating with relevant national and local authorities (This will be described as part of ERP)

3. Hazard Identification

The proponent shall identify potential hazards arising from the proposed activity, through: (i) Review of activity design and work methods; (ii) E&S screening results; (iii) Initial site observations; (iv) Review incident history; (v) Stakeholder consultations. The identification may include at least the following information:

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- Type of hazardous and toxic materials and/or waste;
- Industry type;
- Classification of hazardous and toxic materials and/or waste;
- Volume of hazardous and toxic materials and/or waste;
- Source of hazardous and toxic waste;
- Potential threat to community health and safety (through identification of number of community potentially exposed to the hazardous and toxic materials and/or wastes and potential level of exposure to the hazardous and toxic materials and/or waste); and
- Potential threat to occupational health and safety

4. Analyzing and Evaluating the Hazards and Risks

Each identified hazard shall be assessed based on:

- Likelihood of occurrence;

  (**Rare**: Highly unlikely to occur; may only occur in exceptional circumstances; **Unlikely**: Not expected to occur, but possible; has not happened frequently in the past; **Possible**: Might occur at some time; could occur, but uncommon. **Likely**: Will probably occur in most circumstances; recurrent but not frequent.)
- Severity of potential impacts on workers and/or communities, including vulnerable groups.

Hazard assessment will then use assessment matrix (Table 1) to assess initial risk and residual risk after controls. Risks are then classified using a risk matrix that combines likelihood and severity to determine the overall risk level and the corresponding level of control and mitigation measures required.

Table 1. Example of Hazard/Risk Assessment Matrix

Severity of Impact	Likelihood of Occurrence			
	Rare	**Unlikely**	**Possible**	**Likely**
Minor (negligible or easily reversible impacts; no injury or very minor disturbance)	Low	Low	Moderate	Moderate
Moderate (Temporary impacts; minor injury (injury that requires medical treatment beyond first aid); days disruption to public services; localized and short-term impacts to environment; moderate loss of community's assets)	Low	Moderate	Moderate	Substantial
Significant	Moderate	Substantial	Substantial	High

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Severity of Impact	Likelihood of Occurrence			
	Rare	Unlikely	Possible	Likely
(Serious injury (injury that may cause fracture, amputation, loss of consciousness); significant environmental damage but recoverable; multi-week disruption to services; major loss of community's assets)				
Severe/ Critical (Fatality; permanent disability; long-term and large-scale contamination or habitat loss; prolonged large-scale disruption to public services; major direct loss of community's assets or critical works)	Substantial	High	High	High

The resulting risk classification (low, moderate, substantial, or high) determines the proportionality of required risk management measures.

5. Risk Control Measures

Risk control measures shall be determined in accordance with the mitigation hierarchy, including:

- Elimination: physically remove the hazard from the workplace or activity
- Substitution: Replace the hazard with a safer alternative
- Engineering controls: Isolate people from the hazard through design or equipment
- Administrative controls: change work procedures or schedules to reduce exposure, including defining trigger points for activity stoppage or permit-to-work.
- Personal protective equipment (PPE): provide protective gear to reduce risk of injury or illness.
- Community protection measures (safety zoning, site security, public information).

As resulted from Hazard and Risk Assessment, risk control measures could be documented and integrated into relevant instruments, including but not limited to ESMP, OHS Management Plan, Hazardous and Toxic Materials and/or Waste Management Plan. The management plan should define specific actions, responsible person, due date, and resources needed to implement the plan.

6. Emergency Response Plan (ERP)

RHA is used to determine if such emergency events call for the preparation of an Emergency Response Plan (ERP). ERP is prepared based on identification of hazards or risk factors, conducted as part of RHA. An ERP will include, as appropriate:

- engineering controls (such as containment, automatic alarms, and shut-off systems) proportionate to the nature and scale of the hazard;
- identification of and secure access to emergency equipment available on-site and nearby;
- notification procedures for designated emergency responders;
- diverse media channels for notification of the affected community and other stakeholders;
- a training program for emergency responders including drills at regular intervals;
- public evacuation procedures;
- designated coordinator for ERP implementation; and
- measures for restoration and cleanup of the environment following any major accident.

Ministry of Environment and Forestry No. 74 of 2019 on Emergency Program for the Management of Hazardous and Toxic Materials and/or Wastes provides detailed guidance on developing an ERP. In preparing the ERP, it is important that the views of all segments of the local community, including the elderly, children, and any vulnerable groups that may be present, along with those of the emergency services/local response teams and relevant government agencies (e.g., BNPB), be taken into consideration. ERP shall allow affected parties to understand exactly what action to take in the event of an emergency. The proponent will support affected communities and other relevant parties through training and collaboration and will conduct such training in conjunction with the training provided to activity workers as part of the OHS requirements.

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Annex 12. Biodiversity Management Framework

1. Introduction

Biodiversity underpins ecosystem functions, environmental services, and community resilience, particularly within disaster risk management contexts. Healthy ecosystems contribute to disaster risk reduction, support recovery processes, and enhance long-term resilience of communities affected by natural hazards.

The Biodiversity Management Framework (BMF) is established as an integral component of the PFB Environmental and Social Management System (ESMS) to provide a structured, risk-based, and proportionate approach for managing biodiversity risks and impacts. The BMF aligns with applicable national environmental regulations and the SLS 6, applying the mitigation hierarchy, precautionary approach, and adaptive management. As a framework-level instrument, the BMF defines procedures and decision rules to determine when further biodiversity assessment or a project-specific Biodiversity Management Plan (BMP) is required.

2. Scope of Application

The BMF applies to pre- and post-disaster activities that may affect biodiversity directly, indirectly, or cumulatively, as well as activities that depend on biological resources or ecosystem services for their effectiveness or sustainability. Application of the BMF is integrated with ESMS screening and assessment processes and is proportionate to the characteristics of the activity and the sensitivity of the receiving environment.

3. Objectives

The BMF aims to ensure consistent and risk-based management of biodiversity risks and impacts within ESMS decision-making, compatible with disaster risk management operations. The objectives are to:

- ensure application of the mitigation hierarchy in PFB-supported activities;
- protect habitats, species, and ecosystem functions, including natural and critical habitats;
- support no net loss of biodiversity and, where relevant, and net gain for critical habitat values;
- provide clear procedures for biodiversity screening and assessment;
- define triggers for activity specific biodiversity management instruments; and
- promote consistent monitoring, reporting, and adaptive management.

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4. Habitat Definitions

"Habitat" is defined as a terrestrial, freshwater, or marine geographical unit or airway that supports assemblages of living organisms and their interactions with the non-living environment[50]. Habitats vary in their significance for conserving globally, regionally and nationally important biodiversity, their sensitivity to impacts and in the significance different stakeholders attribute to them. Because, in most instances, habitat loss, degradation or fragmentation represents the greatest threat to biodiversity, much of the focus of biodiversity conservation actions is on maintaining or restoring suitable habitats.

Habitat categorized as follow:

a. Natural Habitat

Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition. Natural Habitats include nature protection areas, nature reserve areas, and other areas that have ecological functions and provide environmental services.

b. Modified Habitat

Modified habitats are areas that may contain a large proportion of plant and/or animal species of non-native origin, and/or where human activity has substantially modified an area's primary ecological functions and species composition[51]. Modified habitats may include, for example, areas managed for agriculture, forest plantations, reclaimed[52] coastal zones, and reclaimed wetlands.

Differentiating modified habitat from natural habitat may call for expert judgment as to whether the characters and functions of the habitat remain essentially natural. Habitats affected by potentially harmful human activities are typically still considered as natural habitats if such activities:

- Have limited impact on the species composition or ecological function of the habitat;
- Form part of a long-term pattern of traditional use, to which native species assemblages have adapted;
- Are no longer prevalent, and the habitat supports a mature and diverse community of predominantly native species; or

[50] World Bank ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
[51] A habitat will not be deemed to be a modified habitat where it has been converted in anticipation of the Activity.
[52] Reclamation as used in this context is the process of creating new land from sea or other aquatic areas for productive use

- Have not profoundly affected the habitat's ability to recover its former ecological characteristics.

c. Critical Habitat

Critical habitat is defined as areas with high biodiversity importance or value, including:

- habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches.
- habitat of significant importance to endemic or restricted range species;
- habitat supporting globally or nationally significant concentrations of migratory or congregatory species;
- highly threatened or unique ecosystems; and
- ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d). Both natural and modified habitat can be classified as critical habitat.

d. Legally protected and internationally and regionally recognized areas of biodiversity value, which may encompass habitat in any of the previous habitat category. Internationally recognized areas of high biodiversity value include World Heritage Natural Sites, Alliance for Zero Extinction Sites, Biosphere Reserves, Ramsar Wetlands of International Importance, Key Biodiversity Areas and Important Bird Areas, among others.

5. Biodiversity Screening and Risk Categorization

Biodiversity screening is integrated into the ESMS screening process (SLS1) and serves as the entry point for identifying biodiversity risks and sensitivities. The biodiversity screening objectives are:

- To gain information whether the potential biodiversity risk and impact will trigger the negative list (Annex 4).
- To determine the biodiversity aspect risk category based on the limited data available at the early stage of activity.
- To identify the needs of further study or assessment and the extent of that study.
- To identify the resources needed, including biodiversity specialist, in order to conduct further impact assessment and management.

The biodiversity screening should be conducted at the earliest possible stage during proponent self-assessment process, in particular at the negative list screening process.

Screening considers the type of activity (please refer to Annex 2 and Annex 5B), activity location and proximity to sensitive areas, habitat type, species of conservation concern, ecosystem

services relevant to livelihoods and disaster risk reduction, and the nature and scale of the proposed activity. Screening is conducted based on available secondary data, expert judgment, and may be complemented by rapid field verification where feasible.

For biodiversity screening, preliminary data on the activity location must be gathered, which needs to include the following but not limited to:

Administrative	To identify the activity location and its vicinity administratively which will potentially affect the biodiversity values in terms of policies and stakeholders. The administrative information of the activity location should also be used to identify the potential of transboundary impact that might occur.
Area Status	To identify the potential presence of national and global conservation and protected areas within the activity area, impacted and study areas within some distance based on best practice based on professional judgement and potentially affected species. This identification should include regional and international initiative on biodiversity (habitat and species). For instance, Heart of Borneo Initiative, the Tiger Conservation Landscape (TCL), Coral Triangle Initiative, East Asian and Australasian Flyway Partnership (EAAFP), WWF Ecoregion, etc.
Habitat of Proposed Project and Surrounding Areas	To identify the landcover, habitat, and ecosystem types within the activity area and its relevant surroundings. The presence of natural and unique habitat/ecosystem will become activity's concern. Some of the natural and unique habitats may not designated as protected areas under Indonesia regulation or mentioned as internationally recognized areas.
Species of Conservation Significant	To identify the potential species of conservation significance that may inhabit the area. Species of conservation significance include: • Critically Endangered, Endangered and Vulnerable species based on IUCN Red List; • Endemic and/or restricted range species; • Migratory Species; and • Protected species under Indonesia regulations.
Wildlife Sensitivity Map	To identify weather the activity area and its vicinity located within sensitive area to the wildlife and its habitat. Several references on wildlife sensitivity map are listed in **Section 4.1**
Stakeholders	To identify the potential stakeholders regarding wildlife and habitat protection and conservation on local level to international level. Liaison with IUCN/Species Survival Commission (SSC) Primate Specialist Group (PSG) Section on Great Apes (SGA) is required to conducted in advance especially where the great apes (orangutan) may potentially occur within the activity are and vicinity (IFC, 2019). It's also suggested (if necessary) to liaise with

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	other IUCN SSC Groups when critically endangered species occur within the project area and vicinity (within AOI).

Consultation with governments officials, conservation organization, local communities, and experts is important to be conducted in this early risk screening stage to help the activity in identifying of key biodiversity impacts, including those linkages with livelihood and social issues. In some situations, biodiversity aspects may need to be included in the FPIC (Free, Prior and Informed Consent) process for indigenous peoples.

At the screening stage, possible potential critical habitat shall be identified based on preliminary information of species protection and conservation requirements, land cover and habitat classification, including feedback from social receptors and stakeholders, and expert justifications. It should be referred to as “Preliminary identification of potential critical habitat”. The preliminary identification also needs to mention the baseline to be surveyed with detailed proposed targeted species and method of survey. In this preliminary identification, potential stakeholders also need to be identified and plan for further consultation can be developed. This preliminary identification can inform the activity in determining the activity’s risk classification.

National Conservation Forest Area

Forest status areas serve as a significant factor in determining the status of the land, which is implicated in the legal status and regulations that apply. In general, forest areas managed by the central government are divided into three functions, namely production, protection, and conservation.

Conservation forest is defined as a forest area with specific characteristics, primarily aimed at preserving the diversity of plants and animals, as well as their ecosystems. The main purpose of a conservation forest is to protect and maintain the natural habitats and biodiversity within it. Conservation forest comprises different types of protected areas, each with its specific purposes and management objectives. The main categories of conservation forest are:

- Nature Reserve Forest Areas: These include Nature Reserves and Wildlife Reserves, which are designated to protect and preserve specific natural habitats, ecosystems, and wildlife species.
- Nature Conservation Forest Areas: This category includes National Parks, Grand Forest Parks, and Nature Tourism Parks. National Parks aim to safeguard unique landscapes and ecological diversity. Grand Forest Parks are meant to protect large forested areas with high ecological value, while Nature Tourism Parks focus on promoting eco-tourism and raising environmental awareness.
- Hunting Parks: These areas allow controlled hunting activities to manage wildlife populations and maintain ecological balance, while still ensuring the conservation of species.

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Conceptually, utilization activities are allowed in conservation forest areas, except in specific conservation management zones such as the core zone, wilderness zone, and nature reserve forest. These restricted zones are designated to ensure the protection and preservation of the forest's most ecologically sensitive and critical areas. In contrast, other parts of the conservation forest may be used for various activities that are deemed compatible with conservation objectives, balancing human needs with ecological preservation.

In the context of environmental screening, conservation areas, particularly Nature Reserve Forest Areas and the core zone - wilderness zones management areas, hold the highest level of importance. When conducting a screening process, it is crucial to consider the status of forest area data and its implications. Additionally, if the project spatially affects conservation areas other than Nature Reserve Areas, zoning data that supports the decision-making process is essential.

Notably, Nature Reserve Areas can act as significant obstacles to project implementation because there are no regulations that support their use. In this case, the concept of avoidance should be given the highest priority if the project is to proceed. This means avoiding any activities or development that may negatively impact the Nature Reserve Areas in order to prioritize their preservation and conservation

5.1. Negative List Screening

Screening against Negative List should be conducted at the early stage of the proponent self-assessment process. The activity location should be screened against the Negative List as stipulated in Annex 4, where the negative list related to biodiversity is:

“Activities that will likely bring adverse impact to existing or proposed legally protected areas and/or internationally recognized areas, without demonstrating a technically acceptable process to mitigate biodiversity loss and that the activity is legally permitted and act consistently with any recognized management plans.”.

Screening against existing or proposed protected conservation area and/or national and internationally protected ecosystem can be conducted through overlaying the activity location with spatial plans (which have information on protected area, including Alliance for Zero Extinction - AZE) and wildlife sensitivity map. Wildlife sensitivity maps include, but are not limited to:

- Area with international status e.g., Ramsar Wetlands of International Importance, Biosphere Reserves, etc.

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- Important area for biodiversity, e.g., Important Biodiversity Areas (IBA), Tiger Conservation Landscape (TCL), and other important areas such as Key Biodiversity Areas (IUCN), etc.
- Presence and distribution of important species, e.g., IUCN List of threatened species, Global Biodiversity Information System, Species abundance: the Living Planet index.

Screening for sensitive wildlife, can be done using various tool, e.g. Integrated Biodiversity Assessment – IBAT, etc.

Information that can be gathered and analysis that can be conducted at this screening stage is limited. This may cause the result of screening against negative list cannot be definitively concluded, e.g., whether the activity will bring adverse impact to the sensitive area, or regarding offset of the biodiversity net loss. In such cases, a more comprehensive study and assessment on biodiversity may be required, e.g. critical habitat assessment, specific species or habitat study, etc. If a more comprehensive study is required, the involvement of a biodiversity specialist is mandatory. The biodiversity specialist should give a clear understanding to proponent on the potential risk and efforts that are required related to this condition, such as studies that need to be conducted, the potential of mitigation effort required, etc. This should be noted by proponent and to be taken into consideration in taking decision on proceeding the activity planning.

5.2. Risk Categorization

The screening process, including screening against the negative list, enables the early identification of biodiversity risks and impacts. These identified risk and impact should be assessed, with reference to the risk classification in Annex 5A, to determine the classification of biodiversity impact which then may contribute to the activity's risk classification and also to determine follow up action related to biodiversity management.

Table 1 Risk Categorization and Follow-up Actions

Risk Category	Follow-up Actions
Low	Good practice measures. No additional biodiversity-specific assessment is required beyond standard ESMS measures; good practice measures are applied as appropriate, referring to ESCOP.
Moderate	Targeted baseline information and specific mitigation measures are identified; biodiversity considerations may be integrated into the environmental document (i.e., SPPL/UKL-UPL) required by the Government of Indonesia
Substantial to High	Further impact assessment and biodiversity management plan.

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Risk Category	Follow-up Actions
	Further assessment is required to better understand potential impacts, and the preparation of a project-specific Biodiversity Management Plan (BMP) or other biodiversity instrument may be triggered in accordance with this Framework.

For emergency response activities, screening and categorization rely on the best available information and apply precautionary decision-making to avoid irreversible impacts, whenever feasible.

6. Critical Habitat Assessment

Critical habitat is defined as areas with "high biodiversity importance value", including: a) habitat of significant importance to Critically Endangered and/or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches; b) habitat of significant importance to endemic or restricted-range species; c) habitat supporting globally or nationally significant concentrations of migratory species or congregatory species; d) highly threatened or unique ecosystems; and e) ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described in (a) to (d)."[53]

Critical habitat assessment shall be carried out for activity that located within internationally or nationally areas of high biodiversity value, or in areas that have strong indication to have high biodiversity value, or in potential critical habitat areas. Where biodiversity screening indicates potential interaction with critical habitat, consultation with a biodiversity specialist is required to determine the need for a Critical Habitat Assessment (CHA).

Critical habitat is not limited to pristine or highly biodiverse areas. It can include both modified and natural habitats supporting the biodiversity values that trigger the critical habitat criterion. Critical habitat can therefore be a subset of both modified and natural habitats.

Table 2 details the qualifying requirements for critical habitat criteria 1 to 3 (i.e., thresholds) where the details of the likely qualifying interests for Criterions 4 and 5 are defined based on research, expert opinion, and expert justification.

Table 2 The Qualifying Requirements for critical habitat

Criteria	Thresholds
Criterion 1: Critically Endangered (CR) / Endangered (EN) species:	Areas that support globally important concentrations of an IUCN Red-listed EN or CR species (0.5% of the

[53] World Bank Environmental and Social Standard (ESS) 6

Criteria	Thresholds
	global population AND 5 reproductive units 15 of a CR or EN species) Areas that support globally important concentrations of an IUCN Red-listed VU species, the loss of which would result in the change of the IUCN Red List status to EN or CR and meet the thresholds in (a). As appropriate, areas containing nationally/regionally important concentrations of an IUCN Red-listed EN or CR species.
Criterion 2: Habitat of significant importance to endemic and/or restricted-range species;	Areas that regularly hold ≥10% of the global population size AND ≥10 reproductive units of a species.
Criterion 3: Habitat supporting globally significant concentrations of migratory species and/or congregatory species;	Areas known to sustain, on a cyclical or otherwise regular basis, ≥ 1 percent of the global population of a migratory or congregatory species at any point of the species' lifecycle. Areas that predictably support ≥10 percent of the global population of a species during periods of environmental stress.
Criterion 4: Highly threatened and/or unique ecosystems; and/or	Areas representing ≥ 5% of the global extent of an ecosystem type meeting the criteria for IUCN status of CR or EN. Other areas, not yet assessed by IUCN, but determined to be of high priority for conservation by regional or national systematic conservation planning.
Criterion 5: Areas associated with key evolutionary processes	No specific criteria
Notes: Endemic Species = an endemic species is one that has ≥ 95 percent of its global range inside the country or region of analysis; Restricted-range Species = Species with world distributions of less than 50,000km2; Migratory species = Any species or lower taxon of wild animals, in which a significant proportion of the members of the entire population or any geographically separate part of the population cyclically and predictably crosses one or more national jurisdictional boundaries; Congregatory Species = Species that gather in globally significant numbers at a particular site and at a particular time in their life cycle for feeding, breeding or resting (during migration).	

Based on the critical habitat assessment, if the activity area is defined as to contain critical habitat, a management plan will be developed to manage the criterion that triggered the critical habitat status. The management plan should be included in the Biodiversity Management Plan - BMP (see **Section 10**), although the details of the management plan related this critical habitat can be documented in separate document.

7. Biodiversity Risk and Impact Assessment (Framework Level)

Biodiversity risk and impact assessment under this BMF is conducted at a framework level to support informed decision-making within the Environmental and Social Management System (ESMS). The assessment identifies and evaluates the potential of biodiversity-related risks and impacts associated with PFB-supported activities. It does not replace activity-specific environmental and social impact assessments but provides a structured basis for determining appropriate management responses, including the need for mitigation or an activity-specific Biodiversity Management Plan (BMP).

Biodiversity risk and impact assessment, which include identification of potential risk and impact and followed by assessment of its significant, is basically an iteration process. The first assessment is conducted during screening and categorization process, which utilize the limited available data at the time. The screening and categorization result will inform whether further assessment or specific study is required. When further assessment required, a comprehensive baseline data collection will be conducted to enable a deeper and accurate assessment.

The biodiversity risks and impacts assessment covers risks and impacts identified during screening and those identified at subsequent stages, especially as more detailed data become available. Any specific study, such as critical habitat assessment, will contribute to a comprehensive identification and assessment of biodiversity risk and impact.

The following are aspects that need to be considered when identifying biodiversity impacts:

- Ecosystem affected
- Species affected
- Ecosystem services affected
- Protection status
- Site ownership and control
- Baseline threats
- Potential project-related risks and impacts.

All types of impacts shall be identified also whether it is a direct impacts, indirect impacts, or cumulative impacts. **Table 3** outline the types of biodiversity impact that potentially occur.

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Table 3 Types of Biodiversity Risks and Impacts Considered

Impact Type	Description
Direct impacts	Habitat disturbance, vegetation clearance, or direct effects on species resulting from physical works or operational activities
Indirect impacts	Changes in land use patterns, increased access, or secondary activities affecting habitats or species over time
Cumulative impacts	Combined effects of multiple activities within the same area or landscape
Ecosystem service impacts	Impacts on services supporting livelihoods, disaster risk reduction, and recovery processes

The assessment focuses on the interaction between the proposed activity and the sensitivity of the receiving environment and applies a qualitative, risk-based approach. The use of expert judgment reflects the need for timely decision-making, where data availability, access to sites, and time for detailed assessment may be limited. Expert judgment is exercised by qualified environmental specialist and/or biodiversity specialist based on relevant professional experience, available secondary and spatial data, and site-specific observations, and enables proportionate and precautionary risk management without delaying critical emergency response actions.

There are several important principles in the impact assessment of biodiversity components:

- The impacts of all stages of activity development and operation should be assessed, including activities required prior activity commencing (if any).
- The expected impacts on biodiversity and habitat should be compared with current environmental changes and trends in biodiversity that would be likely to happen without the proposed development.
- Both positive and negative impacts should be covered, with appropriate mitigation measures to address the negative impacts, as well as possible measures to enhance the positive ones.
- All identified biodiversity impact will be assessed for its significance. Significance assessments will incorporate the impact characteristic, biodiversity value, sensitivity and vulnerability and likelihood, as outlined in **Table 4** below.

Table 4 Assessment of Significance

Assessment Aspect	Key Considerations
Impact characteristics	Extent, duration, reversibility

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Assessment Aspect	Key Considerations
Biodiversity value	Conservation value of habitats and species
Sensitivity & vulnerability	Irreplaceability, especially for natural and potential critical habitats
Likelihood	Probability of impacts under proposed design and operations

8. Mitigation Hierarchy and Management Measures

The mitigation hierarchy is the central principle guiding biodiversity management under this BMF. The hierarchy is applied sequentially and proportionately to manage biodiversity risks and impacts associated with PFB-supported activities, based on the outcomes of risk and impact assessment.

The hierarchy comprises the following steps:

(a) avoidance of potential impacts wherever feasible;
(b) minimization of impacts that cannot be fully avoided;
(c) restoration or rehabilitation of affected habitats and ecosystem functions; and
(d) offsetting, considered only as a last resort for significant residual impacts after all feasible avoidance, minimization, and restoration measures have been applied.

The mitigation hierarchy emphasizes eliminating risk by design to the maximum extent possible (through avoidance and minimization), and only then implementing corrective measures as needed (through restoration and then compensation through offsets).

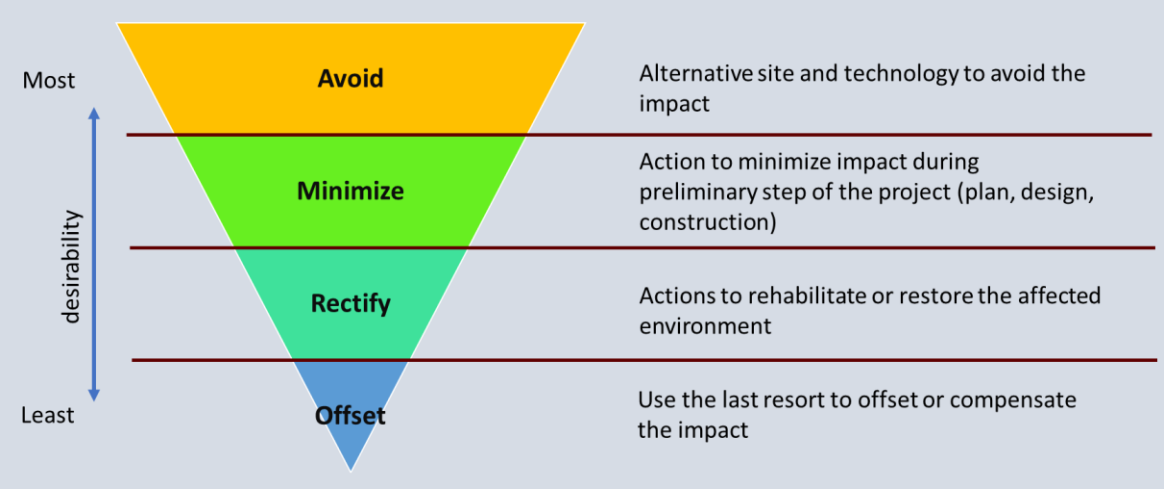

Figure 1 Mitigation Hierarchy

The objective of biodiversity management is 'no net loss', therefore residual impact that still present will need to be managed through restoration and/or offset measures. For project within

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critical habitat area, where offsets are required, the mitigation measure goal is to achieve 'net gain'. The biodiversity mitigation hierarchy and the biodiversity value to be achieved is depicted in **Figure 2**.

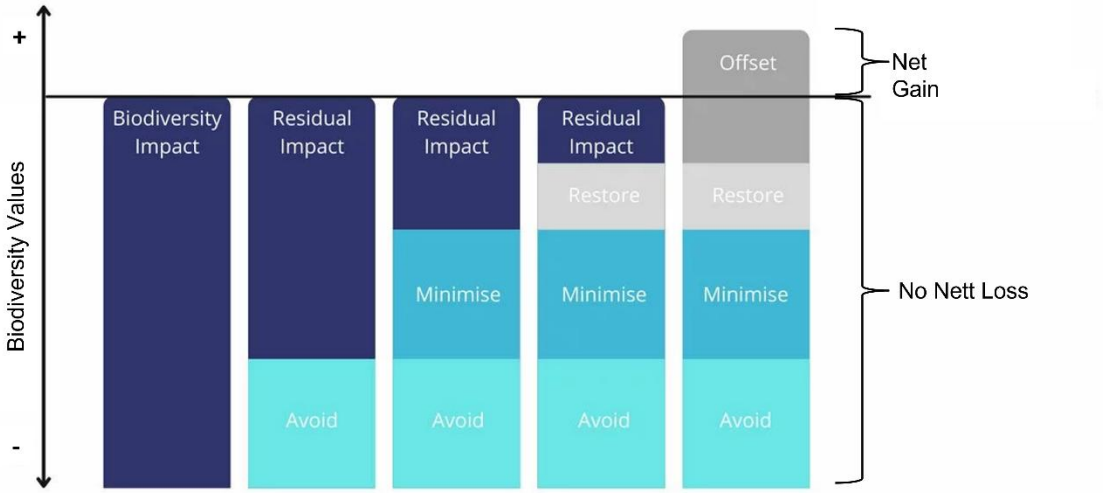

Figure 2 Mitigation Hierarchy and Biodiversity Values

Planned mitigation measures and management actions shall be documented in a management plan, either as part of the overall activity management plan or as a stand-alone Biodiversity Management Plan (see **Section 10**).

9. Monitoring and Review

Each of the mitigation strategies that are planned should be monitored in order to ensure that management activities are carried out according to plan and ensure that project activities do not violate the provisions that have been regulated and determined.

In developing a monitoring plan for activities planned, the following items should be taken into account, but not limited to:

- Parameters to be monitored.

  Parameters to be monitored will depend on the mitigation measures planned and the performance indicator that are relevant and measurable for the mitigation measures type. For example, parameters to be monitored for restoration measures by re-planting cleared area during the construction phase include the number of trees planted, grow and die, and the growth rate. The parameters should be measurable, biodiversity indicators are not always quantitative, but wherever possible quantitative metrics should be used.

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- Monitoring location

  The monitoring location will depend on the mitigation measures planned, which include at the area where the mitigation measures are executed and at the area of influence of the project, and/or where an induced impact may occur.

- The frequency of inspection and monitoring.

  The frequency of monitoring will depend various factors, which includes the magnitude of impact, the sensitivity or limit of the receptor, the complexity of the mitigation measures planned, etc. Frequency of several parameters that should be monitored in the permit, if any, must comply with the provisions in the permit, at minimum.

- Instruments that will be used for monitoring, including calibration requirements.

  The method and instrument to be used will comply with applicable regulation (if any) and will follow the best practice as technically feasible.

- The resources

  The monitoring will determine the minimum required qualifications of persons who will conduct the monitoring and inspection. In some cases, public participation in monitoring can be a requirement or a strategy in a management. The public participation in monitoring should be also determined, including the requirement of the public that will participate.

Monitoring plan should be documented together with the mitigation measures and management action plan, as described in previous section.

Monitoring shall cover not only the implementation of mitigation measures and management action, but also the effectiveness and adequacy of the management plan itself. The management plan is a living document and have to be referred throughout the activity cycle. The objectives, targets and approaches established in the plan should be periodically reviewed, and where necessary, revised or updated to ensure optimal outcomes.

10. Biodiversity Management Plan (BMP)

A Biodiversity Management Plan (BMP) is a project-specific management instrument prepared to address significant biodiversity risks and impacts identified through the application of the BMF and the ESMS screening and assessment process. The BMP operationalizes the mitigation hierarchy and SLS 6 requirements into concrete, activity-specific measures, roles, and monitoring arrangements.

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Within the ESMS for Pooling Fund Bencana (PFB), the BMP is required on a risk-based basis and not mandatory for all activities. Activities with significant impacts on natural habitats, critical habitats, or species of conservation concern are likely to require a BMP. Depending on the nature and complexity of the activity, the BMP may be prepared as a stand-alone document, where biodiversity risks are significant or complex; or integrated into the ESMP, where biodiversity issues are limited in scope and can be managed alongside other environmental and social measures.

Where relevant, the BMP may be complemented by other SLS-specific instruments, such as an Indigenous Peoples Plan (IPP), Land Acquisition and Resettlement Action Plan (LARAP), or other thematic plans, to ensure comprehensive risk management.

Indicative Content of a BMP is described in table below. The content and level of detail of the BMP are commensurate with the level of biodiversity risk and the implementation phase.

Table 5 Indicative Content of BMP

BMP Section	Description	Practical Examples
a. Objectives	Clear biodiversity objectives derived from risk and impact assessment. assessment, including commitments to no net loss on the biodiversity value. However, for some cases, especially for project located within critical habitat area, will have a higher goal, which is 'net gain' on biodiversity value.	Explains what biodiversity values need to be protected or achieved, based on risk and impact assessment results. For example: ▪ Avoid damage to natural habitats ▪ Achieve *no net loss* of biodiversity ▪ Achieve *net gain* where critical habitats may be affected
b. Activities	All the activities planned as part of the mitigation measures and activities for managing the impacts, especially on critical habitat (based on the critical habitat assessment), will be described in clear manner in the management plan. If an offset is planned, then it should be included as one of the management activities, while the detail of the offset may be documented in separate document.	Describes what actions will be carried out to meet the biodiversity objectives. For example: ▪ Adjusting work locations to avoid sensitive areas ▪ Protection of certain species ▪ Habitat restoration or rehabilitation
c. Activity Requirements	Specific biodiversity management requirements to be implemented, such as biodiversity-related prohibitions or specific restrictions for	Sets out clear rules and restrictions that contractors and workers must follow during implementation. For example:

BMP Section	Description	Practical Examples
	civil works contractors and project workers.	▪ No clearing of specific vegetation ▪ No hunting or wildlife collection ▪ Limits on working hours to reduce disturbance
d. Implementation Schedule	Indicative schedule for implementing biodiversity management measures, aligned with the activity phases, including any permit or license that should be obtain prior management measures commencing.	Explains when biodiversity measures will be implemented, aligned with activity phases. For example: ▪ Implementation of erosion control – concurrent with planting ▪ Protection of seedling – immediately after planting.
e. Institutional Responsibilities	Clear roles and responsibilities for BMP implementation, supervision, monitoring, and reporting, including responsibilities of implementing entities, contractors, and relevant ESMS oversight functions.	Clarifies who is responsible for implementing, supervising, and reporting on the BMP. For example: ▪ Implementing entity ▪ Contractors ▪ ESMS oversight team
f. Cost Estimates	Indicative cost estimates or resource requirements associated with implementing the BMP, commensurate with the level of biodiversity risk and scale of the activity.	Provides an indicative estimate of costs or resources needed to implement the BMP. For example: ▪ Costs for restoration activities ▪ Monitoring and supervision costs

For activities implemented under emergency response conditions, BMP measures may be phased, prioritizing immediate avoidance and minimization actions, with more comprehensive biodiversity management measures refined and implemented during the recovery and reconstruction in post-disaster phase as additional information becomes available.

11. Qualification of Experts

The level of expertise required to support biodiversity management under the BMF is proportionate to the level of risk and complexity of the activity. For activities with low biodiversity risk, screening and management may be supported by general environmental and social specialists with relevant experience.

For activities with moderate to high biodiversity risk, or where significant impacts on natural habitats, critical habitats, or species of conservation concern are identified, suitably qualified

biodiversity experts are engaged. Such experts may be required to support data collection, risk and impact assessment, design of mitigation measures, or preparation of an activity-specific BMP.

Qualification for biodiversity specialist or expert is provided in Chapter 6.

Annex 13. Sexual, Exploitation, and Abuse/ Sexual Harassment (SEA/SH) Risk Management

1. INTRODUCTION

Sexual Exploitation, Abuse, and Sexual Harassment (SEA/SH) refers to any form of sexual misconduct or inappropriate behaviour involving an imbalance of power, coercion, or lack of consent. It includes: (i) Sexual exploitation occurs when an individual takes advantage of another person's vulnerability or position for sexual purposes, often by exchanging sex for money, employment, goods, services, or other benefits; (ii). Sexual abuse involves any actual or threatened physical sexual act that is carried out without consent, often through force, coercion, or manipulation; (iii) Sexual harassment refers to unwelcome sexual advances, requests for sexual favors, or other verbal, non-verbal, or physical conduct of a sexual nature that creates an intimidating, hostile, or offensive environment. SEA/SH can occur in any setting and undermines the dignity, safety, health, and well-being of individuals, particularly those who are vulnerable or in dependent situations. This document focuses on SEA/SH risk management for PFB funded activities that include pre-disaster, emergency, and post disaster activities with low to high environmental and social risks. While intended to reduce disaster risks, these activities may unintentionally heighten SEA/SH risks due to gender inequality, power imbalances, limited community awareness, and insufficient safeguards such as grievance mechanisms and codes of conduct. The table below provides a detailed breakdown of potential SEA/SH risks in pre-disaster, emergency, and post context:

Table 1-A. Example of Potential SEA/SH Risks in Pre-Disaster Activity

Cluster Activities	SEA/SH Potential Risks
Planning and policy formulation **Prevention** (mitigation, preparedness, early warning**)** **Logistics and equipment provision** **Capacity building and professional development**	**1. Abuse of Power and Coercion in Decision-Making, Enforcement, and Capacity Building.** SEA/SH risks may occur when officials or facilitators misuse their authority to coerce or solicit sexual favors in exchange for access to benefits, participation, certification, assessments, recruitment, procurement, or program inclusion. Such power imbalances disproportionately affect women and marginalized groups, especially where oversight and accountability are weak. **2. Harassment and Exclusion in Public Engagements, Consultations, and Capacity Building activities**. SEA/SH risks may occur during consultations, trainings, workshops, especially in male-dominated or hierarchical settings, where women and marginalized participants may face harassment, intimidation, or exclusion, especially

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Cluster Activities	SEA/SH Potential Risks
(training, technical guidance, certification, exercises, simulations)	in the absence of clear Codes of Conduct, supervision, or reporting mechanisms. **3. SEA/SH Risks during Operational and Field Activities** Field and operational activities such as data collection, site surveys, logistics delivery, equipment installation, and disaster simulations (e.g., evacuation drills) may expose participants to SEA/SH risks, particularly in remote, poorly lit, or insecure locations. **4. Weak or Inaccessible Complaint and Reporting Mechanisms** The absence of inadequacy of safe, accessible, and confidential SEA/SH reporting mechanisms may lead to underreporting, impunity, and continued exposure to SEA/SH risks. Limited awareness of Codes of Conduct, unclear accountability frameworks, and lack of referral pathways to survivor support services can further exacerbate risks during the pre-disaster phase.

Table 1-B. Example of Potential SEA/SH Risks in Emergency Response Activity

Cluster Activities	SEA/SH Potential Risks
Search, victim evacuation and affected communities (i.e., organizing of evacuation routes, provision of temporary facilities and accommodation, search operations for disaster victims, identification of mass casualties, funeral assistance for heirs of deceased victims, and disability compensation for individuals with permanent physical/mental impairments resulting from disasters.)	Potential risks include sexual exploitation or harassment during evacuation, transport, and temporary accommodation, abuse of power by responders or volunteers in search and rescue, inappropriate handling of bodies during mass casualty identification, coercion linked to funeral assistance, and discrimination or exploitation of women/vulnerable groups during compensation processes. **Example:** ▪ Women, children, or persons with disabilities experience harassment in evacuation routes or temporary shelters due to overcrowding, lack of lighting, or weak supervision.
Refugee and Protection • **Provision of housing** (includes land clearing or land preparation, preparation of buildings/structures, building rental, procurement, and installation of tents, supporting housing facilities, relocation, and Temporary Housing Allowance (DTH), as well as stimulant funds for repairing the	Potential risks include sexual exploitation linked to housing or cash assistance, harassment in temporary shelters, lack of privacy and security in camps, exploitation during construction activities. **Example:** ▪ Women experience harassment in emergency shelters due to lack of privacy, lighting, or separate facilities.

Cluster Activities	SEA/SH Potential Risks
houses of disaster victims (during the transition from emergency to recovery) • **Provision of clean water and sanitation services and hygiene facilities** • **Food services/provision** (i.e., Procurement and distribution of food; Preparation of equipment, supplies, and the operation of public/community kitchens; Procurement of kitchen equipment for disaster-affected victims) • **Clothing services/provision** (including the procurement and distribution of clothing) • **Protection** of vulnerable groups, people with disabilities, and other groups with special needs	Potential risks include harassment or assault at water points, sanitation facilities, and bathing areas due to inadequate lighting, privacy, or security, particularly affecting women, children, and persons with disabilities, as well as exploitation linked to access to WASH services. **Example:** Women or girls experience harassment or assault when accessing water points, latrines, or bathing facilities due to inadequate privacy, lighting, or security.
	Potential risks include sexual exploitation or harassment during food distribution, community kitchens, or food-for-work activities; abuse of power by staff or volunteers controlling food access. **Example:** Women involved in food preparation or distribution face harassment from supervisors, volunteers, or other beneficiaries.
	Potential risks include exploitation or harassment during clothing distribution, misuse of beneficiary data, favoritism, and inappropriate conduct by staff or volunteers. **Example:** Individuals experience harassment during clothing distribution, particularly in crowded or poorly organized settings.
	Potential risks include discrimination, neglect, or abuse of vulnerable populations, sexual exploitation linked to access to protection services, barriers to reporting incidents, and heightened risk of violence due to dependency on caregivers or service providers. **Example:** Caregivers or service providers misuse their position to exploit or abuse individuals who depend on them for assistance.
Logistic: Providing support and/or mobilization of logistical assistance and equipment in a cohesive and integrated manner within the Regional Work Unit (SKPDB) in the following areas: preparing logistical and equipment	Potential risks include sexual exploitation in exchange for relief assistance, abuse of authority during aid registration and distribution, harassment at assembly points, SEA/SH risks linked to procurement and rental processes, and increased vulnerability of displaced persons during movement and return.

Cluster Activities	SEA/SH Potential Risks
plans; supporting the recording of logistical assistance and equipment; distributing logistical assistance and equipment; and other activities in the logistics and equipment sector as deemed necessary.	**Example:** Beneficiaries are asked for personal favors or subjected to harassment in exchange for inclusion in aid registration lists or receipt of relief items
Health services (including medical procurement, emergency and hospital care, disease control, evacuation, temporary facilities, health worker support, and health financing for disaster-affected populations)[54].	Potential risks include sexual harassment or exploitation in healthcare settings, abuse of power related to access to treatment by health workers or support staff, SEA/SH risks in temporary accommodation, evacuation, isolation, or quarantine facilities. **Example:** ▪ Patients experience harassment or abuse by health or support staff when seeking medical treatment or access to medicines.
Education services (i.e. school supplies and emergency school infrastructure and facilities	Potential risks include sexual harassment or exploitation in temporary learning spaces, inadequate child safeguarding measures and vulnerabilities due to limited supervision or infrastructure. **Example:** ▪ Children face harassment or abuse in temporary learning spaces due to inadequate supervision or safeguarding protocols.
Recovery (Providing support and/or mobilizing assistance for immediate recovery services for vital infrastructure and facilities, including emergency repairs and site cleanup, recovering data and information related to population data, land ownership data, government, and community asset data)	Potential risks include sexual harassment or exploitation in recovery activities occur due to power imbalances and emergency working conditions. **Example** • Sexual exploitation in labor recruitment, or sexual harassment in the workplace.
Strengthening/repair/restoration of vital infrastructure and facilities, and structural mitigation (Activities may be carried out on an emergency, semi-permanent, or permanent basis, based on recommendations and technical assessments from the relevant	Potential risks include SEA/SH incidents involving workers and surrounding communities, exploitation related to employment opportunities, harassment at worksites, unsafe labor conditions affecting vulnerable workers, and abuse of authority during community engagement and compensation processes.

[54] (i.e. Procurement and distribution of health equipment and materials; procurement of medical supplies, pharmaceutical products, and health equipment; medical services, including outpatient and inpatient costs; operational costs of field emergency hospitals; operations for disease surveillance and vector control; Limited isolation and quarantine, including building rental; payment of death compensation for health workers and disaster victims; provision/procurement of emergency or specialized hospitals; provision of lodging/rest facilities for health workers carrying out emergency duties; provision of land, air, and sea evacuation infrastructure and facilities; financing of health services for Indonesian citizens returning from abroad who are affected by disasters)

Cluster Activities	SEA/SH Potential Risks
technical agencies or the authorized Ministries/Institutions)	**Example:** ▪ SEA/SH incidents occur around work sites involving workers and local communities due to weak codes of conduct and supervision
Empowerment of disaster-affected community groups include assistance for small- and medium-scale production tools/machinery; cash for Work (Labor-Intensive Cash Assistance); maintenance of livestock and plant seedlings)	Potential risks include exploitation in cash-for-work or livelihood activities, harassment in group-based assistance programs, abuse of power in beneficiary selection, unequal access to resources. **Example:** ▪ Participants in cash-for-work or livelihood activities are pressured or harassed by supervisors in exchange for selection or payment.

Table 1-C. Example of Potential SEA/SH Risks in Post Disaster Activity

Cluster Activities	SEA/SH Potential Risks
Housing Sector Rehabilitation and reconstruction of housing, including the restoration and rebuilding of residential structures affected by disasters.	Potential SEA/SH risks include sexual exploitation linked to eligibility decision or access to housing cash assistance, abuse of power during construction; inadequate privacy and safety in project site; harassment in housing settings. **Example:** ▪ A community member is pressured by a local official or contractor to provide sexual personal favors in order to be prioritized for housing allocation or reconstruction assistance.
Infrastructure Sector Rehabilitation and reconstruction of infrastructure, consisting of the repair and upgrading of vital facilities such as roads, bridges, and public utilities.	Potential SEA/SH risks include sexual exploitation linked to access to job or project benefits; harassment by workers, or supervisors at construction sites; risks from labor influx to surrounding communities, unsafe conditions for women and vulnerable workers, and limited access to grievance mechanisms. **Example:** ▪ SEA/SH incidents occur between incoming labor forces and surrounding communities due to inadequate codes of conduct and supervision.
Economic Sector Community empowerment activities and the development or improvement of facilities in agriculture, plantations,	Potential SEA/SH risks include sexual exploitation linked to beneficiary selection or access to livelihood and cash support. assistance, productive assets, or cash-based support; harassment in community or MSME programs;

Cluster Activities	SEA/SH Potential Risks
livestock, fisheries, industry, tourism, cooperatives, and Micro, Small, and Medium Enterprises (MSMEs)	**Example:** ▪ Beneficiaries are coerced or pressured by facilitators to provide sexual personal favors in order to be selected for livelihood assistance, MSME support, or cash-based programs
Social Sector Community empowerment activities and the development or improvement of facilities in health, education, religious institutions, cultural preservation, and social welfare organizations.	Potential SEA/SH risks include sexual exploitation and harassment in service delivery, abuse of authority in accessing social assistance or services; inadequate safeguarding measures within community-based institutions. **Example:** ▪ Individuals face harassment or abuse when accessing health, education, or social welfare services due to power imbalances between service providers and beneficiaries
Cross-Sector Rehabilitation and Reconstruction The rehabilitation and reconstruction of government infrastructure, forest and land rehabilitation, coastal area rehabilitation, watershed (DAS) conservation, waste and wastewater management, and sustainable agricultural practices	Potential SEA/SH risks include sexual exploitation linked to land use decisions, compensation, employment, or rehabilitation access; harassment during consultations or implementation; limited reporting mechanisms; and heightened risks for vulnerable groups. **Example:** ▪ Community members are pressured or exploited during consultations related to land use, compensation, or rehabilitation benefits

SEA/SH Relevant Regulatory Framework.

Indonesia has established a comprehensive legal framework to address and prevent SEA/SH, emphasizing protection, accountability, and survivor-centered responses. Key regulations include Law No. 23 of 2004 on the Elimination of Domestic Violence, which addresses SEA/SH within households, and Law No. 21 of 2007 on the Eradication of Human Trafficking, which targets sexual exploitation with strict penalties for offenders. Additionally, Law No. 12 of 2022 on Sexual Violence Crimes *(Tindak Pidana Kekerasan Seksual -TPKS)* specifically focuses on preventing and responding to sexual violence, ensuring survivors have access to justice and support services; Minister of Women's Empowerment and Child Protection Regulation No. 13 of 2020 on the Protection of Women and Children from Gender-Based Violence in Disaster Situation (*Peraturan Menteri Pemberdayaan Perempuan dan Perlindungan Anak Nomor 13 Tahun 2020*

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tentang Perlindungan Perempuan dan Perlindungan Anak dari Kekerasan Berbasis Gender dalam Bencana) this regulation focuses on protecting women and children from gender-based violence in disaster contexts, including prevention and response measures.

Complementary regulations, such as Government Regulation No. 70 of 2020 on the Protection of Women and Children from Violence and Presidential Decree No. 7 of 2021 on the National Strategy for the Elimination of Violence Against Children, reinforce institutional frameworks to safeguard vulnerable groups, particularly in disaster-related contexts. Regulation of the Head of the National Disaster Management Agency (BNPB) No. 13 of 2014 on Gender Mainstreaming in Disaster Management (*Peraturan Kepala Badan Nasional Penanggulangan Bencana Nomor 13 Tahun 2014 tentang Pengarusutamaan Gender di Bidang Penanggulangan Bencana*), which serves as a guideline for applying principles of gender equality and equity across all phases of disaster management, from preparedness and emergency response to post-disaster recovery.

1.1. Objectives

The development of SEA/SH risk management for PFB funded activities aims to ensure that disaster risk financing initiatives are designed and implemented in a way that prevents, mitigates, and responds to SEA/SH risks in disaster-affected communities. It describes the requirements, processes, and arrangements required to comply with the Environmental and Social Standard/ *Standar Lingkungan dan Sosial* (SLS) in the PFB ESMS and the Indonesian legislation. It also describes the E&S management measures that need to be adopted by relevant activity.

1.2. Guiding Principle

The SEA/SH risk management for the PFB funded activities are grounded in 6 key principles (1). *Prioritize the survivor's perspective*: ensuring the confidentiality of survivors, upholding non-discrimination, and prioritizing their safety, throughout the handling of SEA/SH incidents; (2) *Emphasize prevention*: Implement risk-based strategies that identify the main risks of SEA/SH and take steps to prevent or reduce harm; (3) *Build on existing local knowledge*: Engage community partners—local leaders, civil society organizations, gender and child advocates as resources for knowledge on local-level risks, effective protective factors and mechanisms for support throughout the activity cycle;(4) *Be evidenced-based*: Build on existing global research and knowledge on how to address SEA/SH effectively;(5) *Be adaptable:* SEA/SH prevention and mitigation measures should be flexible to address the unique drivers of SEA/SH in each context, considering local cultural, social, and economic factors, as well as the specific nature of the disaster or crisis; (6).*Support ongoing monitoring and learning*: Ensure that operations include

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mechanisms for regular monitoring and feedback to assess effectiveness and enhance internal understanding of what strategies work in preventing, mitigating, and responding to SEA/SH.

2. KEY STRATEGIS AND APPROACHES FOR SEA/SH RISK MITIGATION AND MANAGEMENT

Effective SEA/SH risk mitigation requires clear policies with zero tolerance, clearly defined roles, and responsibilities, and comprehensive communication to all stakeholders. These efforts are supported through awareness campaigns, capacity building, and the establishment of safe, and survivor-centred reporting mechanisms to encourage disclosure without fear of retaliation. Monitoring and evaluation frameworks should include SEA/SH indicators to track mitigation effectiveness.

To operationalize these principles, the activity applies a harmonized, risk-based framework for Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) risk prevention across the pre-disaster and post-disaster phases. This framework applies mitigation measures proportionate to assessed risk levels, as detailed in Table 2.

For consistency and proportionality, SEA/SH risks are categorized using the same risk levels (Low, Moderate, High) across all activity phases. While the risk categories remain consistent, the underlying risk drivers, exposure, and manifestations differ by phase and are reflected in the phase-specific descriptions and mitigation measures presented in the table below.

Table 2 Integrated SEA/SH Risk Mitigation Framework Across Pre- and Post-Disaster Phases

SEA/SH Risk Level	Description	Core SEA/SH Mitigation Measures	Key Tools / Instruments
Low Risk	SEA/SH risk is low where disaster-related activities during pre-disaster and post-disaster phases are small-scale, well regulated, and community-based. Labor influx is limited (less than 50 external workers), survivor services are accessible, institutional coordination is functional, and power imbalances between implementers and affected populations are minimal.	• Enforcement of Codes of Conduct for all personnel and contractors. • Basic SEA/SH awareness raising and training for staff, workers, and relevant stakeholders. • Establishment of accessible, confidential, and survivor-centered grievance redress mechanisms. • Mapping and dissemination of SEA/SH survivor services.	• Code of Conduct. • SEA/SH training materials. • SEA/SH-sensitive GRM and referral pathway. • Service provider mapping.

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SEA/SH Risk Level	Description	Core SEA/SH Mitigation Measures	Key Tools / Instruments
		• Provision of gender-segregated facilities and SEA/SH-free zone signage, where relevant.	
Moderate Risk	SEA/SH risk is moderate where pre-disaster and post-disaster activities involve multiple sites, moderate labor influx (50–100 external workers), cash- or assistance-based interventions, or evolving power imbalances. Survivor services exist but may be uneven, partially accessible, or overstretched due to disaster impacts.	**All Low-Risk measures, PLUS:** • Preparation and implementation of a phase-appropriate SEA/SH Action Plan integrated into ESMP or post-disaster planning instruments. • Designation of a SEA/SH focal point or person in charge within the implementing institution. • Targeted SEA/SH training for supervisors, contractors, and implementing partners. • Strengthened monitoring of worksites and program activities.	**All Low-Risk tools, PLUS:** • SEA/SH Action Plan (adaptive and time-bound). • ToR for SEA/SH focal point. • Monitoring and reporting tools.
High Risk	SEA/SH risk is high in contexts involving large-scale or prolonged pre-disaster and post-disaster operations, significant labor influx (more than 100 external workers), housing, land, livelihood, or compensation assistance, and weak protection systems. Survivor services are limited or poorly coordinated, and accountability mechanisms are weak.	• Implementation of a comprehensive SEA/SH Action Plan applying survivor-centered, confidentiality, and "do no harm" principles. • Mandatory integration of SEA/SH prevention obligations into all contracts, TORs, and procurement documents. • Deployment of qualified SEA/SH specialists to support planning, implementation, monitoring, and coordination. • Proactive monitoring, regular safety reviews, and updating of mitigation measures in response to evolving risks.	• Comprehensive SEA/SH Action Plan (High Risk). • SEA/SH clauses in contracts, ToRs, and procurement documents. • ToR for SEA/SH Specialist. • Monitoring and incident management tools.

The table presents an integrated SEA/SH risk mitigation framework for Pre-disaster and post-disaster phases, structured according to risk level (low, moderate, and high). While pre-disaster and post-disaster differ in timing and operational focus, the underlying SEA/SH risk drivers such

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as labor influx, power imbalances, and access to survivor services remain consistent across both phases. Accordingly, the framework consolidates core SEA/SH mitigation measures while allowing for adaptive application to phase-specific contexts, ensuring coherent, survivor-centred risk management across the disaster cycle.

Detailed information on key activities to prevent and manage SEA/SH risks in pre-disaster and pots-disaster activities with low to high risks is provided below:

1). Development and Approval of the Code of Conduct (CoC). All activities funded under PFB require developing and implementing a Code of Conduct (CoC) for their organizations, managers, and staff. The CoC must be signed by all relevant parties before the commencement of work. A sensitization session on the regulations and sanctions outlined in the CoC will be conducted for all project stakeholders. Sanctions will be applied to individuals who violate the agreed-upon regulations. Potential sanctions include Informal and formal warning; additional training; deduction of up to one week's salary, suspension of employment (either administrative leave or unpaid leave) - ranging from a minimum of one month to a maximum of six months, termination of employment and referral to law enforcement or relevant authorities, if necessary

2). SEA/SH Awareness Raising for all relevant individuals involved in activity. As activities are implemented, training on SEA/SH will be conducted, targeted group activity implementers include civil works contractors (including sub-contractors and suppliers), supervision consultants, other consultants who may have a presence in the project adjoining communities. Training materials will cover SEA/SH concepts, activity-related risks, roles and responsibilities, reporting mechanisms, accountability, referral procedures, code of conduct, and available survivor services.

3). SEA/SH integrated Grievance Redress Mechanism. The PFB program's SEA/SH-integrated Grievance Redress Mechanism (GRM), shall ensures sensitive handling of SEA/SH complaints with clear procedures, timely support, and accountability. Activities level develop GRM using local resources, supported by trained officials and information-sharing protocols to maintain confidentiality. Multiple reporting channels are identified through community consultations. Awareness campaigns and IEC materials inform stakeholders, while communication materials are shared via the project website, social media, and other platforms.

4). Service Provider Mapping. Service provider mapping is conducted to identify and maintain an up-to-date inventory of available Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) prevention and response services within and around the project area, ensuring that

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survivors have timely access to confidential, appropriate, and survivor-centred support. The mapping includes coordination with relevant government institutions, health facilities, law enforcement, and civil society organizations to document service availability, accessibility, referral procedures, and response capacity, particularly in emergency and post-disaster contexts where services may be disrupted. The results inform the establishment of SEA/SH referral pathways integrated into the activity's grievance redress mechanism (GRM) and are regularly reviewed and updated to ensure accuracy throughout all project phases.

5.) Establish coordination with existing service providers. As part of its responsibility in responding to the case, the project will establish coordination with service provider, especially to refer SEA/SH survivor immediately after receiving a complaint. The proponent will coordinate with existing service providers to ensure prompt referrals for SEA/SH survivors. Formal partnerships with local organizations, health facilities, legal aid, and counselling services will ensure comprehensive support. Coordination includes joint training, shared resources, regular meetings, MOUs, and information-sharing protocols to strengthen the SEA/SH response network.

6). The development of SEA/SH Action Plan. Where activities are assessed as moderate to high risk, a SEA/SH Action Plan serves as a roadmap to assess, mitigate, and monitor activity SEA/SH risks. It is prepared by the proponent, with support from the PVE Team and a SEA/SH specialist, and outlines risk mitigation measures, responsible parties, timelines, and budgets. The plan covers SEA/SH service provider mapping, reporting procedures, development of the Accountability and Response Framework, awareness strategies, and monitoring arrangements.

7). Monitoring and Reporting. SEA/SH Action Plan monitoring under the PFB will use clear indicators to assess prevention and response effectiveness. Regular monitoring will track implementation progress, with indicators included in the Results Framework. These include Action Plan implementation (Y/N), number of SEA/SH trainings, percentage of workers signing and attending CoC training, number of grievances referred to service providers, and time taken to resolve complaints.

During the emergency phase, SEA/SH risk management follows the existing SEA/SH management during emergency procedures by KPPA[55]. The procedures measure prioritizes the rapid application of existing protection standards, codes of conduct, referral pathways, and SEA/SH-sensitive grievance mechanisms rather than the preparation of extensive planning

[55] Minister of Women's Empowerment and Child Protection Regulation No. 13 of 2020 on the Protection of Women and Children from Gender-Based Violence in Disaster Situations/ *Peraturan Menteri Pemberdayaan Perempuan dan Perlindungan Anak Nomor 13 Tahun 2020 tentang Perlindungan Perempuan dan Perlindungan Anak dari Kekerasan Berbasis Gender dalam Bencana.*

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documents. The existing procedures already include SEA/SH risk and impact assessments in disaster situations; standards and procedures for the prevention and response to SEA/SH (integrated into the delivery of basic needs, temporary shelters and housing, water and sanitation services, health, education, psychosocial services, and security); a survivor-centered approach; complaint handling and referral pathways; human resource capacity; as well as coordination and operations through BNPB's national disaster management cluster approach (including the Child Protection Sub-Cluster and the Gender-Based Violence Prevention and Response Sub-Cluster under the Camp Coordination and Protection Cluster).

Monitoring and evaluation instruments are also in place, covering safety audits of displacement sites, checklists for health and psychosocial service facilities, referral mapping, and monitoring of SEA/SH prevention and response integration in disaster contexts. While SEA/SH regulations already exist, strengthening their effective implementation requires capacity building for relevant personnel and improved grievance management.

3. IMPLEMENTATION PLAN

3.1. Roles and Responsibilities

SEA/SH risk management under this document is fully integrated into the existing ESMS governance structure and do not constitute a standalone or parallel institutional arrangement. In line with the ESMS framework, SEA/SH risk management is implemented through a mainstreaming approach, whereby SEA/SH prevention, reporting, and response measures are embedded within the mandates, functions, and workflows of existing institutions and actors involved in implementation of PFB funded activities. This approach ensures institutional coherence, avoids duplication of functions, and strengthens accountability across all activity phases; pre-disaster, emergency response, and post-disaster recovery and reconstruction.

At the policy and oversight level, BNPB, as defined in Chapter 6 of the ESMS, serves as the central coordinating institution responsible for ensuring that SEA/SH risk prevention and management requirements are systematically incorporated into PFB policies, funding guidelines, and decision-making processes. Operational handling of SEA/SH cases and survivor support, however, is conducted through established grievance and referral systems in coordination with qualified service providers, in line with survivor-centered and "do no harm" principles.

Operationally, SEA/SH roles and responsibilities are distributed across existing PFB management for PFB and ESMS implementation activities and activity proponents for PFB funded activities. SEA/SH responsibilities are integrated throughout the activity cycle. For PFB funded activities,

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during the proposal assessment and approval phase, SEA/SH risks are identified and classified as part of the E&S screening process, and corresponding mitigation measures are incorporated into Environmental and Social Management Plans (ESMPs) and SEA/SH Action Plans, where required. During implementation, designated focal points and activity management teams ensure the enforcement of Codes of Conduct, operation of SEA/SH-sensitive grievance mechanisms, delivery of awareness and training activities, and coordination with service providers. During monitoring and post-implementation stages, SEA/SH indicators are tracked through the ESMS monitoring framework, and corrective actions are applied as necessary to address emerging risks or non-compliance.

Table 3 below summarizes SEA/SH-specific roles and responsibilities as embedded within the PFB institutional structure and ESMS framework.

Tabel 3. Roles and Responsibilities for SEA/SH Risk Prevention and Management

Institutional Level / Structure	Designated Role	SEA/SH Roles and Responsibilities
BNPB	Head of BNPB	• Ensure SEA/SH risk prevention and response requirements are integrated into relevant policies, funding decisions. • Provide overall institutional leadership and accountability for ESMS implementation including SEA/SH risk management.
BNPB – ESMS Function	Review, Verification and Evaluation (PVE) Team, supported by E&S Specialist	▪ Ensuring SEA/SH risk considerations are integrated into review, verification, and evaluation of PFB-funded activities. **Screening & Approval Phase:** • Assess SEA/SH risk level (Low–Moderate–High) as part of E&S screening. • Ensure SEA/SH commitments are incorporated into Proponent Commitment, ESMP, and SEA/SH Action Plans (as applicable). • Assess readiness of SEA/SH-sensitive GRM and referral pathways. **Implementation & Monitoring:** • Monitor implementation of SEA/SH mitigation measures and Action Plans. • Review SEA/SH incident reports and compliance documentation.

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Institutional Level / Structure	Designated Role	SEA/SH Roles and Responsibilities
		• Provide technical advice and recommendations to PVE Team and Technical Deputies.
BNPB / PFB	SEA/SH or Gender Focal Point (designated)	• Serve as technical coordinator for SEA/SH. prevention and response under PFB. • Ensure SEA/SH-sensitive, confidential, and survivor-centered GRM operation. • Uphold principles of confidentiality, informed consent, non-retaliation, and “do no harm.” • Liaise with SEA/SH service providers and relevant authorities for referral and coordination.
Activity Proponent	Coordinator / SEA/SH Specialist (for high-risk SEA/SH)	• Integrating SEA/SH risk considerations into E&S screening and assessment of proposed activities. • Develop SEA/SH management tools based on risk level, i.e. code of conduct (CoC), SEA/SH action plan as part of ESMP, SEA/SH integrated GRM. • Implement SEA/SH management tools and Action Plans approved under proponent E&S commitment. • Ensure all SEA/SH complaints are addressed and referred appropriately. • Conduct SEA/SH awareness activities for workers and communities • Identify, manage, and report SEA/SH incidents and refer to service providers as relevant.
Contractors / Implementing Partners	Contractor Manager / Site Manager	• Ensure all personnel sign and comply with the CoC. • Manage SEA/SH risks at worksites, camps, and service delivery points. • Report SEA/SH allegations through established GRM channels.
PFB Grievance Redress Mechanism	GRM Officer / Complaint Administrator	• Receive, record, and manage SEA/SH complaints securely and confidentially. • Protect whistleblowers and survivors from retaliation. • Coordinate escalation and referral to SEA/SH focal point and service providers.
Referral System	GBV Service Providers (Health, Psychosocial, Legal)	• Provide survivor-centered medical, psychosocial, legal, and protection services. • Maintain survivor safety, dignity, and confidentiality. • Act as official referral institutions under the SEA/SH referral pathway.

To operationalize the roles and responsibilities outlined in Table 3, a clear and structured reporting and coordination flow is required to ensure timely SEA/SH risk escalation, survivor-centred response, and institutional accountability. The proponent is expected to develop an activity-specific SEA/SH governance and reporting structure, clearly defining responsibilities, lines of communication, and escalation protocols. For detailed guidance on reporting mechanisms, including safe, confidential, and survivor-centred grievance procedures, documentation requirements, and case follow-up, the project team should refer to information in the box in Chapter 9 of this ESMS.

3.2 Example of Template Instruments

i. SEA/SH Risk Prevention and Response Action Plan (Template)

Project Name : _____

SEA/SH Risk Level : _____

Prepared by : _____

Date : _____

Activities	Timeline	Indicator	Responsibility	Risk Management

ii. SEA/SH Risk Prevention and Response Action Plan (Sample)

Project Name : _____

SEA/SH Risk Level : _____

Prepared by : _____

Date : _____

Activities	Timeline	Indicator	Responsibility	Risk Management
1.SEA/SH Awareness raising				
1.1. Training/orientation session carried out to sensitize Activity on importance of addressing /SEA/SH risks on the activity and the mechanisms that will be implemented.		Proponent staff sensitized on the SEA/SH risk factors in the activity areas and trained on how to prevent and respond to SEA/SH. # of activity related staff sensitized on SEA/SH.		Monitor the activities and provide additional guidance as necessary.
1.2. Awareness raising and sensitization on SEA/SH for community surrounding to activity.		Community people sensitized on SEA/SH risks. # of community members sensitized.		Monitor the activities and provide additional guidance as necessary.

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Activities	Timeline	Indicator	Responsibility	Risk Management
2. Codes of Conduct (COC) signed and understood				
2.1. Develop CoC and Specify appropriate roles and responsibilities in CoCs. 2.2. Carry out orientations on CoC. 2.3. Have CoCs signed by all those with a physical presence at the activity site		# of activity-related staff and workers trained and oriented on CoC. # of people who signed CoCs		Supervision consultant reporting that CoCs are signed and that workers have been trained and understand their obligations.
3. Establish and strengthen an effective GRM that can respond to SEA/ SH cases based on the existing framework				
3.1. Map SEA/SH service providers in activity areas.		Identified organizations working in the project area. The mapping incorporates the quality assessment of the service providers. Directory of organizations		Update mapping as appropriate.
3.2. Develop a referral process flowchart for SEA/SH case handling.		Availability of an effective GRM with multiple channels to initiate a complaint / parallel SEA/SH.		Ongoing monitoring and reporting on GRM to verify it is working as intended.
3.3. Train personnel to operate GRM i.e., proper documentation for complaint registration and management; and confidential reporting with safe and ethical documenting of SEA/SH cases.		Availability of an effective GRM with multiple channels to initiate a complaint / parallel SEA/SH.	Proponent, discussed and agreed upon the Task Team.	Ongoing monitoring and reporting on GRM to verify it is working as intended.
3.4. GRM dissemination to community.		Availability of an effective GRM with multiple channels to initiate a complaint / parallel SEA/SH.	Proponent, but discussed and agreed upon the Task Team.	Ongoing monitoring and reporting on GRM to verify it is working as intended.
4. Implement other SEA/SH risk prevention activities to reduce SEA/SH risks.				
1.1. Ensure separate, safe, and easily accessible facilities for women and men working on the site. 1.2. Visibly display signs around the activity site (if applicable) that signal to workers and the community that the activity site is an area		Documentation of measures taken to reduce SEA/SH risks.		Ongoing reporting

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Activities	Timeline	Indicator	Responsibility	Risk Management
where SEA/SH is prohibited.				
5.Undertake regular M&E of progress on SEA/SH activities.				
5.1. Conduct M&E field visits. 5.2. Review quarterly the action plan and progress against indicators listed. 5.3. Provide quarterly report		Successful implementation of agreed SEA/SH Action Plan (Y/N). Quarterly report	Proponent, Consultant, contractors	Ongoing reporting

iii. **Code of Conduct on Preventing Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH) - Template**

Proponent/ Company/Firm Code of Conduct

Preventing Sexual Exploitation Abuse and Sexual Harassment (SEA/SH)

The company (**name**) is also committed to creating and maintaining an environment in which Sexual Exploitation Abuse and Sexual Harassment (SEA/SH) have no place, and where they will not be tolerated by any employees engaged by the company.

Therefore, to ensure that all those engaged in the project are aware of this commitment, the company commits to the following core principles and minimum standards of behaviour that will apply to all company employees, associates, and representatives without exception:

General

1. The company – and therefore all employees, associates, and representatives – commit to complying with all relevant national laws, rules and regulations.
2. The company commit to treating women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, births or other status. Acts of SEA/ SH are in violation of this commitment.
3. The company shall ensure that interactions with peers and other project workers are done with respect and non-discrimination.
4. Demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behaviour are prohibited among all company employees, associates, and representatives.
5. The company will follow all reasonable work instructions in line with the national law and the Labor Management Procedure (LMP) for the project.

Gender Based Violence and Violence Against Children

1. Acts of SEA/SH constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment, and if appropriate referral to the Police for further action.
2. All forms of SEA/SH, including grooming, are unacceptable, regardless of whether they take place on the work site, the work site's surroundings, at workers' camps or within the local community.
    a) Sexual Harassment – for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behaviour – is prohibited.
    b) Sexual favors – for instance, making promises or favorable treatment dependent on sexual acts – or other forms of humiliating, degrading or exploitative behaviour, are prohibited.
    c) Sexual contact or activity with children under 18 – including through digital media – is prohibited. Mistaken belief regarding the age of a child is not a defence. Consent from the child is also not a defence or excuse.
3. Unless there is full consent[1] by all parties involved in the sexual act, sexual interactions between the company's employees (at any level) and members of the communities surrounding the workplace are prohibited. This includes relationships involving the withholding/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 Code.
4. In addition to company sanctions, legal prosecution of those who commit acts of SEA/SH will be pursued if appropriate.
5. All employees, including volunteers and sub-contractors are highly encouraged to report suspected or actual acts of SEA/SH by a fellow worker, whether in the same company or not. Reports must be made in accordance with project's SEA/SH Allegation Procedures.
6. Managers are required to report and act to address suspected or actual acts of SEA/SH as they have a responsibility to uphold company commitments and hold their direct reports responsible.

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Implementation

To ensure that the above principles are implemented effectively the contractors commit to ensuring that:

1. All managers sign the Project's 'Manager's Code of Conduct' detailing their responsibilities for implementing the company's commitments and enforcing the responsibilities in the 'Individual Code of Conduct'.
2. All employees sign the project's 'Individual Code of Conduct' confirming their agreement to comply with OHS standards, and not to engage in activities resulting in SEA/SH .
3. Displaying the Company and Individual Codes of Conduct prominently and in clear view.
4. Ensure that posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language as well as for any international staff in their native language.
5. An appropriate person is nominated as the company's 'Focal Point' for addressing SEA/SH issues.
6. Ensuring that the SEA/SH Codes of Conduct are effectively implemented and revised as needed.
7. That the company/firm effectively implement the agreed final SEA/SH Codes of Conduct, providing feedback to Head of BNPB or other function(s) as applicable for improvements and updates as appropriate.
8. All employees attend an induction-training course prior to mobilization to ensure they are familiar with the Project's SEA/SH Codes of Conduct as well as refresher training as relevant.

I do hereby acknowledge that I have read the foregoing Company/Firm Code of Conduct, and on behalf of the company agree to comply with the standards contained therein. I understand my role and responsibilities to prevent and respond to SEA/SH. I understand that any action inconsistent with this Company/Firm Code of Conduct or failure to act mandated by this Code of Conduct may result in disciplinary action.

Company name: _____
Signature: _____
Printed Name: _____
Title: _____
Date: _____

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[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.

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Individual Code of Conduct
Preventing Sexual Exploitation and Abuse and Sexual Harassment

I, _____, acknowledge that adhering to environmental and social standards, following the Project's Code of Conduct for the prevention of Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH) at the work place is important.
The contractor (_____) considers failure to follow OHS standards, or to commit SEA/SH —be it on the work site, the work site's surroundings, at workers' camps, in workers' homes, or the surrounding communities—to be gross misconduct and grounds for sanctions, penalties or potential termination of employment. Prosecution by the police of those who commit SEA/SH may be pursued if appropriate.

I agree that while working on the Project I will:

1. Attend and actively participate in training courses related to ESS, SEA/SH as requested by my employer.
2. Not drink alcohol or use narcotics or other substances, which can impair faculties before or during work activities.
3. Consent to a police background check.
4. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
5. Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
6. Not engage in sexual harassment—for instance, making unwelcome sexual advances, requests for sexual favors, 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.)
7. Not engage in sexual favors—for instance, making promises of favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behaviour.
8. 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.

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9. Unless there is the full consent[1] 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 benefits (monetary or non-monetary) to community members in exchange for sex – such sexual activity is considered "non-consensual" within the scope of this Code.
10. Report through the FGRM or to my manager any suspected or actual SEA/SH by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18, I will:

1. Wherever possible, ensure that another adult is present when working in the proximity of children.
2. Not invite unaccompanied children unrelated to my family into my house unless they are at immediate risk of injury or in physical danger.
3. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also "Use of children's images for work related purposes" below).
4. Refrain from physical punishment or discipline of children.
5. Refrain from hiring children for domestic or other labor below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.
6. Comply with all relevant local legislation, including labor laws in relation to child labor and minimum age.
7. Take appropriate caution when photographing or filming children.

Use of children's images for work related purposes

When photographing or filming a child for work related purposes, I must:

1. Before photographing or filming a child, assess and comply with local traditions or restrictions for reproducing personal images.
2. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.

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3. Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
4. Ensure images are honest representations of the context and the facts.
5. Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

1. Informal warning.
2. Formal warning.
3. Additional Training.
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
6. Termination of employment.
7. Report to the Police if warranted.

I will avoid actions or behaviours that could be construed as SEA/SH. Any such actions will be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to SEA/SH issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____
Printed Name: _____
Title: _____
Date: _____

[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.

iv. Template TOR for SEA/SH Specialist

Below is a template Terms of Reference (TOR) for a SEA/SH Specialist**,** designed for use in high-risk projects**.** The template outlines the key roles, responsibilities, and qualifications required to support the project in preventing, mitigating, and responding to SEA/SH. It serves as a practical guide for project managers and HR teams to ensure that recruitment and deployment of SEA/SH expertise is strategic, compliant, and survivor-centered**.**

Terms of Reference (TOR) SEA/SH Specialist

1. Background: Please describe a brief of proposed PFB activities**.**

2. Objective of the Assignment: to ensure that SEA/SH risks associated with PFB-financed activities are effectively prevented, mitigated, and managed through survivor-centered, confidential, and accountable mechanisms, and that SEA/SH commitments are fully integrated into project design, implementation, and monitoring.

3. Scope of Work: The SEA/SH Specialist shall perform the following tasks:

A. SEA/SH Risk Assessment and Planning: (i). Support SEA/SH risk screening and classification (Low, Moderate, High) in coordination with the PFB Environmental and Social (E&S) Specialist; (ii). Prepare or support the preparation of SEA/SH Action Plans (SAP), proportionate to the assessed risk level, and ensure integration into Proponent E&S Commitment/ ESMP; (iii). Identify SEA/SH risk drivers specific to disaster phases (pre-disaster, emergency, post-disaster) and sectoral activities.

B. Prevention and Mitigation Measures; (i). Support the development, dissemination, and enforcement of Codes of Conduct (CoC) for project personnel, contractors, implementing partners, and volunteers; (ii). Ensure SEA/SH prevention obligations are incorporated into contracts, TORs, and procurement documents; (iii). Design and deliver SEA/SH training and awareness activities for project staff, contractors, field personnel, and relevant stakeholders. (iv). Advise on gender-sensitive and inclusive measures to reduce SEA/SH risks at worksites, shelters, service delivery points, and community interfaces.

C. Grievance Redress and Case Management: (i) Support the establishment and operation of a SEA/SH-sensitive Grievance Redress Mechanism (GRM) that is confidential, survivor-centred, and accessible; (ii). Develop and maintain SEA/SH referral pathways, based on service provider

mapping; (iii). Ensure that SEA/SH cases are handled in line with principles of confidentiality, informed consent, non-retaliation, and “do no harm; (iv). Coordinate with relevant government agencies and service providers (health, psychosocial, legal) for survivor referrals, without directly investigating cases.

D. Coordination and Institutional Strengthening: (i). Act as technical advisor to the PFB Task Team and SEA/SH Focal Point; (ii). Coordinate with relevant BNPB technical deputies (Prevention, Emergency Response, Rehabilitation and Reconstruction) to ensure SEA/SH measures are mainstreamed across phase; (iii). Support capacity building of implementing agencies, contractors, and regional BPBDs on SEA/SH risk management.

E. Monitoring, Reporting, and Learning: (i). Monitor the implementation of SEA/SH Action Plans and compliance with SEA/SH commitments; (ii). Support the development of SEA/SH monitoring indicators and reporting tool;(iii). Prepare periodic progress reports on SEA/SH risk management implementation; (iv). Document lessons learned and recommended improvements to SEA/SH risk mitigation measures.

4. Deliverables

The SEA/SH Specialist shall deliver, at a minimum:

1. SEA/SH risk assessment inputs and recommendations.
2. SEA/SH Action Plan(s) (Moderate or High Risk, as applicable).
3. SEA/SH training materials and records of training delivered.
4. SEA/SH service provider mapping and referral pathway documentation.
5. Periodic SEA/SH monitoring and implementation reports.
6. Inputs to activity E&S progress reports and incident reporting, as required.

5. Reporting and Coordination

The SEA/SH Specialist reports technically to the PVE team which will be supported by Environmental and Social Specialist and works closely with the SEA/SH Focal Point. Coordination is required with BNPB technical deputies, proponents, contractors, GRM officers, and relevant service providers. The SEA/SH Specialist does not conduct criminal investigations or adjudicate cases.

6. Duration and Level of Effort

- Assignment duration: [to be specified, e.g., 6–12 months, extendable based on project needs]
- Level of effort: [Full-time / Part-time / On-call], depending on project risk level and scale.

7. Required Qualifications and Experience

- Advanced degree in social sciences, gender studies, public health, law, development studies, or related fields.
- Minimum 7 years of professional experience in GBV/SEA/SH prevention and response, preferably in development or humanitarian contexts.
- Demonstrated experience with government or development partner–financed projects.
- Strong knowledge of survivor-centred approaches, referral systems, and ethical case handling.
- Familiarity with Indonesian legal and institutional frameworks on GBV/SEA/SH is an asset.
- Excellent coordination, communication, and reporting skills.

8. Ethical Standards

The SEA/SH Specialist must adhere to the highest ethical standards, including confidentiality, informed consent, non-discrimination, and survivor safety, and must comply with the project Code of Conduct at all times.

v. SEA/SH Awareness Raising Module (sample)

The following matrix provides a concise overview of the mandatory content for SEA/SH Awareness Raising training. It highlights the essential topics that every participant must be exposed to in order to understand, prevent, and appropriately respond to sexual exploitation, abuse, and harassment within activity settings. The matrix serves as a practical guide for trainers and project/activity managers, ensuring that all key elements ranging from definitions, risk awareness, code of conduct, to reporting mechanisms are systematically addressed in a survivor-centred and compliant manner.

No.	Mandatory Module Content	Purpose	Key topic
1	Introduction & Zero Tolerance	Establish institutional commitment and training objectives	Zero tolerance, accountability
2	Definitions of SEA and SH	Ensure clear understanding of prohibited behaviors	International standard and government definitions
3	Power Dynamics & Risk Factors	Explain how power imbalance increases SEA/SH risks	Risk-based approach
4	Code of Conduct (CoC)	Clarify acceptable and unacceptable behaviors and sanctions	Mandatory under GPN
5	Reporting & Response Mechanisms	Inform safe, confidential reporting and response process	Survivor-centered, confidentiality

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No.	Mandatory Module Content	Purpose	Key topic
6	Individual Roles & Responsibilities	Reinforce personal duty to prevent and report SEA/SH	Accountability & prevention

Note:

- Minimum duration: 2–3 hours

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Annex 14. Stakeholder Engagement Plan Template

Activity Stages	Target Stakeholders	Consultation Topics/Information Disclosed	Methods Used	Responsible Party	Frequency / Timeline
Example: • Preparation • Implementation	Example: • Communities around the activity site • Health workers from *Puskesmas* in 3 sub-districts, • Etc.	Example: • Project design • Grievance redress mechanism • Procedures for monitoring project progress • Etc.	Example: • Regular meetings • Virtual interviews • Seminars with sign language interpreters • FGDs for women's groups • Site visits • Etc.	Specify the name of the institution/entity responsible for stakeholder engagement activities	Example: • Monthly • Quarterly • Twice a year • Etc.

Consultation Summary Record Template

MINUTES OF MEETING CONSULTATION Title of Activity: Date: Location: Participants: Number (Male: XX; Female: XX) Attachment: List of Attendees		
Meeting Notes	Follow-up Action	Responsible Parties

Annex 15. Land Due Diligence Guideline

The purpose of the Land Due Diligence guideline is to ensure that all land associated with proposed activities funded by PFB has a clear, secure, and undisputed legal status prior to approval and implementation. The due diligence process aims to confirm land tenure and ownership status; identify formal, informal, and customary (*adat*) land rights; assess institutional and organizational arrangements for land administration; and ensure that project design complies with applicable Indonesian laws and regulations as well as the requirements of Environmental and Social Standard/ *Standar Lingkungan dan Sosial* (SLS) 5, are identified and prepared.

Land Due Diligence shall include verification of land ownership and tenure in accordance with applicable Indonesian laws, including Law No. 2 of 2012 on Land Acquisition for Development in the Public Interest, and relevant implementing regulations. The process shall confirm the absence of land disputes, overlapping claims, or unresolved grievances, including those related to customary land (*tanah adat*) and communal land rights. The assessment shall also determine whether the proposed activity has involved land acquisition, land-use restrictions, economic displacement, or physical displacement. Where such impacts are identified, the due diligence shall confirm that appropriate mitigation measures, consistent with SLS 5, have been implemented or are being prepared.

The Land Due Diligence process shall be undertaken by the proponent prior to submission of the activity proposal to PFB, to ensure that land-related risks, impacts, and compliance requirements are identified and addressed at an early stage of activity preparation. This early assessment is intended to avoid delays, legal non-compliance, and social risks during activity implementation.

Land Due Diligence shall be conducted once the proposed activity sites have been identified, and the applicable land use arrangements have been determined. The process shall be carried out through consultation with potentially affected individuals and communities, including landowners, land users, and customary communities (as relevant). The due diligence process shall ensure transparency, inclusive participation, proper documentation, and informed decision-making throughout activity preparation and implementation.

1. Principles of Land Due Diligence for Activity Preparation

Any land use of activities shall be undertaken in compliance with applicable national laws and the provisions of SLS 5. Activities involving land shall be planned and implemented in a manner consistent with the following principles:

- Efforts will be made to avoid and minimize adverse impacts related to land use and involuntary resettlement. Forced eviction shall not be permitted.
- Land due diligence assessment shall be conducted as part of the activity assessment process, and efforts made to avoid and minimize land-related risks and impacts.
- Activities for which land has previously been acquired or cleared will be excluded if land due diligence assessment finds significant legacy issues.
- For activities on government or state-owned land, land due diligence should assess efforts that have been completed or planned to ensure individuals with recognizable rights receive recognitions to enable compensation at replacement value, and those without recognizable rights to receive appropriate assistance in lieu of compensation, through transparent and consultative processes.
- Apply transparency, informed participation, and equitable treatment of affected households, including the assessment of provision of fair compensation and measures to address livelihood impacts.
- Voluntary land donations are allowed only where the conditions specified in the land due diligence assessment are met and documented.
- All reasonable efforts shall be made to reach mutually agreeable terms with landowners and land users regarding land use arrangements and compensation.
- Accessible, transparent, and effective feedback and grievance redress mechanisms are in place and maintained.
- Appropriate mechanisms shall be put in place to monitor compliance with the land due diligence assessment.
- Land use associated with the activity shall be:
    - Directly and significantly related to the proposed activity;
    - Carried out or planned to be carried out contemporaneously with the activity; and
    - Necessary for the activity to be viable and would not have been constructed, expanded, or conducted if the activity did not exist.

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2. Process of Land Due Diligence Assessment

The application of SLS 5 will be required in the event that land is required for activities financed by the PFB. The overall land due diligence process is illustrated in Figure 1.

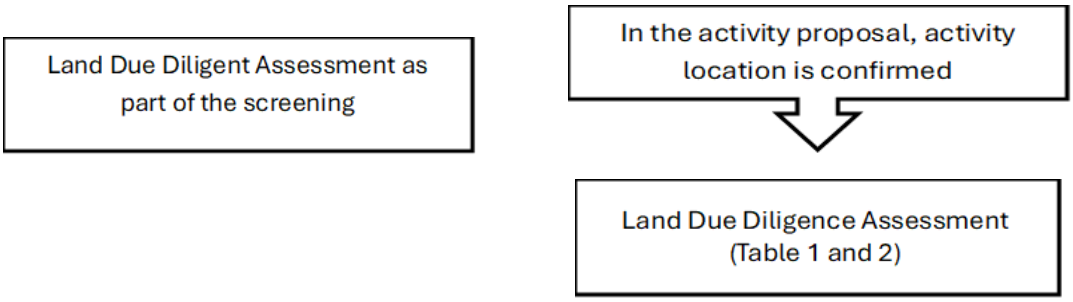

Figure 1. Land Due Diligence Assessment Processes

Once the activity location has been identified, the proponent shall first determine whether the proposed activity requires land. If land is required, the proponent shall conduct a Land Due Diligence Assessment in accordance with the prescribed templates in Tabel 1 and 2 below. This assessment shall document, at a minimum, information on land use, land tenure and legal status, and potential impacts on existing land users, along with proposed mitigation measures, where applicable. The results of the assessment shall then be used to complete the relevant social impact analysis and prepare a Social Impact Management Plan, or Implementation of Social Impact Management measures, as applicable in Table 3.a and 3. b.

3. Voluntary Land Donation Guidelines

The Voluntary Land Donation (VLD) applies when individuals or local groups wish to donate land for the activity implementation. Voluntary land donations should generally be discouraged given the overwhelming vulnerability of Activity Affected Persons. It should only be authorized for formal and non-vulnerable owners in exceptional cases. Activities have to clearly document (a) the potential donor or donors have been appropriately informed and consulted about the program and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor's remaining land area that required to maintain the donor's livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the activity; and (f) for community or collective land, the donation can only occur with the consent of individuals using or occupying the land. Procedures must be put into place to ensure that the donation is indeed voluntary, that the donor is the legitimate

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owner of land-use rights on such lands, and that the donor is fully informed of the purpose of the donation and of the implications of donating the property. If the land is donated on a conditional basis, the terms and conditions for the temporary use of the property must be clearly documented.

Voluntary land donation for a proposed activity will be an acceptable option if:

- Consent from landowners and their spouses and eligible heirs is given;
- The land donor has been informed clearly of his/her public meeting prior to the decision to donate the land voluntarily, but nevertheless, he or she still wishes to donate his/her land without any pressure;
- There is an option to adjust the activity design or location in the case that the landowners refuse to donate their land;
- The land is identified by beneficiary communities and confirmed by technical staff to be suitable for the activity and free from any environmental or health risks;
- The impact on the landowners is insignificant and does not result in the displacement of households, or cause loss of households' incomes and livelihoods;
    - The donated land is free from any ownership disputes or any other claims (e.g. tax, municipal fees/*retribusi daerah*) or encumbrances;
    - Consultations with the land donors or beneficiaries are conducted in a well-informed, free, and transparent manner in the presence of community leaders and facilitators, and they wish to donate the land without pressure;
    - Land donors will benefit directly from the activity;
    - Land donors have the right to refuse to donate their land and therefore there should be alternative sites for activity.

In the case that proponents recommend land through voluntary donation, the proposal should provide information on potential donors and necessary documentation indicating land donors' consent.

4. Feedback and Grievance Redress Mechanism

Feedback and Grievance Redress Mechanisms shall be established at activity level to receive and process grievances related to the use of land for proposed activity, including related to land ownership, land use, and site selection affecting affected individuals and surrounding communities. The guideline to the FGRM channel is explained further in Chapter 9.

The land due diligence process will include a clearly defined grievance mechanism, supported by existing systems within BNPB, with designated staff responsible for complaint intake,

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documentation, follow-up, and resolution. The FGRM will define entry points, response timelines, and record-keeping procedures, and will be disclosed to stakeholders through activity implementation. The mechanism will also support transparent, timely, and locally appropriate resolution of land-related concerns and will be accessible to all affected and interested parties.

5. Template for Land Due Diligence Assessment

Land Due Diligence Assessment consist of information on land use and legal status (table 1); potential impacts on existing land users, along with mitigation measures (table 2); and analysis and implementation of social impact management (table 3.a and 3.b). This document needs to be attached to E&S documents as part of submitted proposal.

1. The land required for the activity is ready (clean and clear) prior to commencement of construction.

No	Verification Item	Information to be completed.	Required documents
1	**Land information**	**a. Location:** **b. Land area:**	
2	Method of land acquisition (please attach proof of lawful land ownership)	a. Owned by a ministry/agency or regional government, since year ..... b. Owned by state or regional government-owned enterprise (BUMN/BUMD), since year ..... c. Purchase/sale (proceed to item 4) d. Donation/gift (proceed to item 5) e. Land crossed (e.g., for a portable water pipeline) (proceed to item 6)	Valid proof of land ownership for items a and b
3	The land to be used has been cleared (compensation has been paid or permits have been obtained) prior to construction, which evidence is provided.	a. Yes b. No	Applicable permits, including, where relevant, the Borrow-to-Use Permit of Forest Areas (*Izin Pinjam Pakai Kawasan Hutan/* IPPKH)
4	**[*if land was acquired by purchase]** Compensation has been provided and the asset owner is satisfied with the given compensation	a. Yes - In what form and when was the compensation/payment provided …..... b. No, please explain …..	Deed of release of rights in accordance with BPN format/sale and purchase agreement
5	**[*If there is a land donation]** Is there a written deed of land donation that has also been signed by the heirs?	a. Yes - Name of the donor of the land and number of family members, or name of	Land donation statement with complete information

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No	Verification Item	Information to be completed.	Required documents
		the company donating the land: …… b. No, please explain ……	
6	**[land crossed]** (e.g., for a potable water pipeline) a. Is there recorded evidence of landowners' consent for the land to be crossed? b. Have the landowners received outreach with complete information on the activity?	a. Yes Number of landowners whose land is crossed and who have granted permission: …… b. No a. Yes b. No	Statement of consent for land to be traversed

2. Mitigation of impacts for land users

1	**Current land use**	**a. Vacant land** **b. Presence of community socio-economic activities** (proceed to item 2): (i) agriculture cultivated by the community (ii) economic enterprises such as kiosks, street vendors (iii) residential settlements (iv) other social or economic activities, specify briefly: …….	
2	**Mitigation of impacts for land users**	**a. To be mitigated (proceed to item 3.a)** **b. Already mitigated (proceed to item 3.b)**	Documentation of impact analysis and social impact management plan (template attached) Documentation of implementation of the social impact management plan (template attached)

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3.a Analysis and Social Impact Management Plan

Activity Description	Data	Social Impacts	Mitigation Plan
[Contains a description of the construction activities to be undertaken, the land area required for the activities, and the location/address of the land to be used]	*[Includes:* *• Number of cultivators/business operators on the land used* *• Identification of cultivators/business operators on the land used (name, age, address, dependents)* *• Types of crops (including quantity and age of crops) or types of social/economic activities* *• Daily/monthly income derived from the social-economic activities]*	*[Contains details of the impacts of the described activities on crops and/or social-economic activities on the land]*	*[Contains the planned social impact mitigation measures as described. This may include, but is not limited to, agreements with affected parties regarding work plans, efforts to avoid or compensate for losses, and measures to prevent and address grievances from affected parties]*

3.b Implementation of Social Impact Management

Activity Description	Data	Social Impacts	Implemented Mitigation Measures
[Contains a description of the construction activities undertaken, the land area used for the activities, and the location/address of the land used]	*[Includes:* *• Number of cultivators/business operators on the land used* *• Identification of cultivators/business operators on the land used (name, age, address, dependents)* *• Types of crops (including quantity and age of crops) or types of social/economic activities* *• Daily/monthly income derived from the social-economic activities]*	*[Contains details of the impacts of the described activities on crops and/or social-economic activities on the land]*	*[Contains information on the social impact mitigation activities that have been implemented. This may include, but is not limited to, agreements with affected parties regarding work plans, measures undertaken to avoid or compensate for losses, and the handling of grievances from affected parties]*

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Annex 16. Indigenous People Planning Framework

Indigenous Peoples in this framework refer to Customary Communities or *Masyarakat Adat* considering Minister of Home Affairs Regulation No. 52 of 2014 on the Guidelines for the Recognition and Protection of Customary Communities. Depending on the scale and nature of potential risks and impacts on Customary Communities, a planning instrument is required for activities that have impacts on Customary Communities. The following provides the key elements of IPPF. In circumstances where Indigenous Peoples affected and/or benefit, as well as anticipated the impacts from activities.

A. Objective

The presence of Indigenous Peoples as per SLS 7 will remain to be determined once specific proposed activity locations have been confirmed. Under these circumstances, an Indigenous Peoples Planning Framework (IPPF) has been prepared to guide the screening, consultations and engagement and management of impacts on Indigenous Peoples if they are present and/or will be affected by the activities.

The proposed activity is required to avoid adverse impacts of activity on Indigenous Peoples or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts. SLS 7 also promotes sustainable development benefits and opportunities for Indigenous Peoples in a manner that is accessible, culturally appropriate, and inclusive. E&S screening will be conducted to inform whether IPs are present in the activity locations/surrounding areas; and the result will be laid out in the activity proposal submitted to the BNPB.

B. Scope of Application

Following the definition of the IPs as above, this document covers Customary Community and Customary Law Community as characterized by the SLS 7, irrespective of formal recognition by the Government of Indonesia. The scope of the measures required under the IPPF is defined based on the nature of risks and impacts, and specific provisions may be required depending on the nature of the anticipated impacts. These are described in the following sections:

1. Identification Criteria

The term Indigenous Peoples is used in a generic sense to refer exclusively to a distinct social and cultural group possessing the following characteristics:

- Self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others.

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- Collective attachment to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas.
- Customary cultural, economic, social, or political institutions that are distinct or separate from those of mainstream society or culture.
- A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

In the context of Indonesia, Indigenous Peoples are referred to as *Masyarakat Adat* (Customary Communities) and *Masyarakat Hukum Adat* (Customary Law Communities) for those who have obtained legal recognition. These are Indonesian Citizens who possess distinctive characteristics, live communally in accordance with their customary law, maintain strong ties to ancestral origins and/or shared residences, have a deep attachment with their land and the environment, and uphold a value system that governs economic, politic, social, cultural, and legal institutions and utilizes a specific ancestral territory.

The application of SLS 7 is apply to Customary Communities, including who may not necessarily identify themselves and/or meet the requirements of Customary Law Communities under the Government of Indonesia's framework but qualify for policy coverage under SLS 7. Such a rationale was adopted to recognize the diversity and complexity of socio- cultural, and traditional characteristics, vulnerability, and relationships with land and natural resources amongst communities in local areas.

2. Site Screening

Site screening will commence in consultations with community representatives, local organizations, including *Adat* organizations or other community organizations, relevant government agencies, academics, etc. of affected Indigenous Peoples, their leaders, and recognized institutions. Site screening will refer to the identification criteria and be led by relevant social specialists in the management ESMS, assisted by facilitators and other expert consultants. This screening will inform further engagement processes, including consultation approaches which seek to promote participation of women, youth, and other vulnerable members of the affected communities.

3. Consultations and Engagement

On the basis of screening, proponents will engage in a process of meaningful consultations with affected Indigenous Peoples. Such engagement is expected to be an iterative process until a common understanding has been reached, including involvement of Indigenous people's

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knowledge in disaster mitigation and emergency response, and participation and consultation if shelter is built on and nearby Indigenous land.

The extent, frequency, and degree of engagement required by the consultation process should be commensurate with the identified potential risks and concerns raised by respective Indigenous Peoples. Meaningful consultations are built on mutually accepted processes by community representatives and their legitimate leaders. These consultations serve at least two purposes:

- Provide a platform to enable community participation to express their concerns, views on the activity's benefits, risks, impacts, and mitigation measures and explore ways to ensure activity implementation is culturally and socially acceptable; and
- Enable decision-making processes based on local/customary mechanisms.

Community participation needs to be based on gender-sensitive and inter-generationally inclusive approaches. Effective consultations are built upon a two-way process that should:

- Involve members of affected communities and their recognized representative bodies and organizations in good faith;
- Capture the views and concerns of men, women and vulnerable community segments including the elderly, youth, displaced persons, children, people with special needs, etc., about impacts, mitigation mechanisms, and benefits where appropriate. If necessary, separate forums or engagements need to be conducted based on their preferences;
- Begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise;
- Be based upon the prior disclosure and dissemination/socialization of relevant, transparent, objective, meaningful, and easily accessible information that is in a culturally appropriate language(s) and format and is understandable for affected communities. In designing consultation methods and use of media, special attention needs to be paid to include the concerns of Indigenous women, youth, and children and their access to development opportunities and benefits;
- Place greater emphasis on inclusive engagement for people directly affected by the activity, rather than people affected indirectly;
- Ensure that the consultation processes are free of external manipulation, interference, coercion, and/or intimidation. The consultation design should create enabling environments for meaningful participation, where applicable. In addition to the language(s)

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and media used, the timing, venues, and participation composition needs to be carefully thought through to ensure everyone can express their views without repercussions; and

- Be documented.

4. Free, Prior, and Informed Consent

Circumstances requiring Free, Prior, and Informed Consent (FPIC) from Indigenous Peoples will be excluded from financing under PFB, such circumstances include:

- Activities/sub-activities have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation.
- Activities/sub-activities cause relocation of IPs from land and natural resources subject to traditional ownership or under customary use or occupation; or
- Activities/sub-activities have significant impacts on Indigenous Peoples' cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected Indigenous Peoples.

5. IPs Impact Assessment

Commensurate to the potential risks and impacts, social assessments will be required as part of the environmental and social impact assessment process to identify the presence and understand the nature of activity impacts on Indigenous Peoples. The assessment is expected to provide a more informed understanding and analysis of risks as well as opportunities through which mitigation measures can be tailored to specific contexts and needs. In this circumstance, both qualitative and quantitative data will inform the assessment, including baseline information on the demographic, social, cultural, and political characteristics of the affected Indigenous Peoples, the land, and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend.

Main areas to be covered include:

- Nature of vulnerability and attachments to land and natural resources.
- Specific risks and potential adverse impacts as a result of activity implementation.
- Level of community acceptance to the activities and/or initiatives supported by the activities;
- Analysis of relevant stakeholders, either who will be impacted or who have an interest to the activities in question, and the elaboration of a culturally appropriate process for consulting with the Indigenous Peoples at each stage of preparation and implementation;

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- Opportunities to enhance participation of the communities concerned as well as benefit-sharing arrangements; and
- Approach to participation, including specific measures to promote participation and inclusion of vulnerable groups in risk management and overall activity implementation.
- The approach and engagement with affected communities for social assessment purposes are based on meaningful consultations in good faith.

6. Indigenous Peoples Plan (IPP)

Prior to proposed activity under initial ESMS, environmental and social screening will be undertaken to assess whether IPs are present. If the activity will interact and/or affect IPs, a social assessment will examine the nature and scale as well as forms of potential risks and impacts. No activities requiring FPIC will be processed under PFB. An Indigenous Peoples Plan (IPP), which may be integrated under the Land Due Diligence Assessment and Stakeholder Engagement Plan (SEP) will be developed by the proponent. Such a plan will include relevant measures to avoid and/or minimize impacts, as well as outline a community engagement strategy, as well as available avenues for FGRM and community feedback.

A planning instrument will be prepared in a flexible and pragmatic manner and its level of detail varies depending on the specific activities and nature of risks. IPPs will reflect key agreements reached during the consultations, main findings of the social assessments, proposed risk mitigation measures and time-bound action plans, including measures to promote community participation, related costs and resources needed to implement the IPPs and FGRM arrangements. The IPP will be disclosed in respective activity sites where Indigenous Peoples are affected, and if necessary, a summary of key agreements will be prepared and/or communicated in language(s) accessible to the affected communities.

The IPP is developed with flexibility and practicality, tailoring its level of detail to the specific activities and associated risks. When social assessments show that Indigenous peoples are the sole or overwhelming majority of direct beneficiaries, a separate IPP is unnecessary; instead, relevant IPP elements should be integrated into the design of PFB-funded activities. Key components of an IPP include:

a. A summary of the social assessment, highlighting key findings and observations from the screening process;
b. A summary of consultations, with documentation of processes, evidence of broad community support, and FPIC where such consent is required;

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c. Proposed mitigation measures and time-bound action plans, including strategies to foster community participation and enhance the benefits of the activities;
d. Estimated costs, resources, and technical support required, including specific expertise to address identified risks; and
e. Feedback and Grievance Redress Mechanism (FGRM).

The activity proponent will oversee the development of activity-level IPPs, which will be reviewed as part of the ESMP and the proponent's E&S commitments.

7. Benefit Sharing

Benefit-sharing arrangements for Indigenous Peoples will be designed and implemented in a manner that reflects meaningful, inclusive, and culturally appropriate consultative processes to be undertaken by the proponent. The implementation of benefit-sharing measures will be strengthened through sustained community consultations, ensuring that Indigenous Peoples are actively involved in the identification, design, and delivery of activity benefits. All affected and participating Indigenous People will be eligible to access activity benefits and will be engaged from an early stage of activity preparation and implementation. In addition, targeted socialization and awareness-raising activities will be conducted across all Indigenous Peoples communities to ensure a clear and shared understanding of the activity's objectives, roles and responsibilities, and anticipated benefits. This approach aims to enable Indigenous People to make informed decisions regarding their participation and to ensure that benefits are equitably distributed in line with community priorities and cultural values.

8. Institutional Arrangement

Implementation of the IPPF will follow the ESMS and institutional arrangement. The development of proposed activity plans addressing SLS 7 requirements, such as community engagement plans or community outreach plans will be the responsibility of ESMS management with technical support from the E&S specialist or other expert as needed. The activity social specialists will be responsible for the overall implementation with ground support from the expert consultants.

9. Monitoring and Grievance Handling

Indigenous People Plan will include Monitoring and Evaluation and Feedback and Grievance Redress Mechanism (FRGM). FGRM for Indigenous people will be tailored to be socially and culturally appropriate, including by identifying the existing grievance channels and extra measures will be provided to meet SLS 7, if necessary. FGRM will also consider a local dispute-resolving mechanism to ensure that the process entails goodwill and respects traditional values and

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practices. Engagement activities, including consultations and dialogues, will be designed to respect local values systems and practices.

10. Outline of an Indigenous Peoples Plan

An indigenous peoples (IPs) plan is required for activities that have an impact on IPs. Its level of detail and comprehensiveness is commensurate with the significance of potential impacts on IPs. The substantive aspects of this outline guide the preparation of an IPP, although not necessarily in the order shown.

A. Executive Summary: This section concisely describes the critical facts, significant findings, and recommended actions.

B. Description of the Activity: This section provides a general description of the activity; discusses activities that may bring impacts on IPs; and identify proposed area.

C. Social Impact Assessment: This section:

- Reviews the legal and institutional framework applicable to IPs in the activity context.
- Provides baseline information on the demographic, social, cultural, and political characteristics of the affected IP communities; the land and territories that they have traditionally owned or customarily used or occupied; and the natural resources on which they depend.
- Identifies key stakeholders and elaborate a culturally appropriate and gender sensitive process for meaningful consultation with IPs.
- Assesses, based on meaningful consultation with the affected IPs communities, and the potential adverse and positive effects of the activity.
- Includes a gender-sensitive assessment of the affected IPs perceptions about the activity and its impact on their social, economic, and cultural status.
- Identifies and recommends, based on meaningful consultation with the affected IPs communities, the measures necessary to avoid adverse effects or, if such measures are not possible, identifies measures to minimize, mitigate, and/or compensate for such effects and to ensure that IPs receive culturally appropriate benefits under the activity.

D. Information Disclosure, Consultation, and Participation. This section:

- Describes the information disclosure, consultation and participation process with the affected IPs communities that can be carried out during activity preparation;

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- Summarizes their comments on the results of the social impact assessment and identifies concerns raised during consultation and how these have been addressed in activity design;
- In the case of activities requiring broad community support, documents the process and outcome of consultations with affected IPs communities and any agreement resulting from such consultations for the activities and safeguard measures addressing the impacts of such activities;
- Describes consultation and participation mechanisms to be used during implementation to ensure IPs participation during implementation; and
- Confirms disclosure of the draft and final to the affected IPs communities.

E. Beneficial Measures: This section specifies the measures to ensure that IPs receive social and economic benefits that are culturally appropriate and gender responsive.

F. Mitigative Measures: This section specifies the measures to avoid adverse impacts on IPs; and where the avoidance is impossible, specifies the measures to minimize, mitigate and compensate for identified unavoidable adverse impacts for each affected IPs group.

G. Capacity Building: This section provides measures to strengthen the social, legal, and technical capabilities of (a) government institutions to address IPs issues in the proposed area; and (b) IPs organizations in the proposed area to enable them to represent the affected IPs more effectively.

H. Grievance Redress Mechanism: This section describes the procedures to redress grievances by affected IPs communities. It also explains how the procedures are accessible to IPs and culturally appropriate and gender sensitive.

I. Monitoring, Reporting, and Evaluation: This section describes the mechanisms and benchmarks appropriate to the activities for monitoring and evaluating the implementation of the IPP. It also specifies arrangements for the participation of affected IPs in the preparation and validation of monitoring and evaluation reports.

J. Institutional Arrangement: This section describes institutional arrangement responsibilities and mechanisms for carrying out the various measures of the IPP. It also describes the process of including relevant local organizations and/or NGOs in carrying out the measures of the IPP.

K. Budget and Financing: This section provides an itemized budget for all activities described in the IPP.

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11. IP Consultation Documentation

Date, Place	Participant	Topic	Concerns and Issues	Recommendations
	(male: xx; female: xx)			

Annex 17. Chance Finds Procedure

The existing Guidelines for Disaster-Resilient Cultural Heritage (Ministry of Education, Culture, Research and Technology, 2023) provide comprehensive procedures for assessing disaster risks

and impacts on cultural heritage within the disaster management phases. They detail mitigation measures, risk-reduction strategies, and protection and recovery processes, and emphasize the importance of coordinated stakeholder engagement, including relevant ministries, affected communities, and cultural heritage experts. The guidelines also stress the need for rapid assessment by qualified experts and the implementation of temporary measures, such as protective covering, to prevent further deterioration of heritage assets prior to post-disaster clean-up.

To complement the existing guideline, this Chance Find Procedure (CFP) is applied when previously unknown cultural heritage is unexpectedly discovered during activities. It sets out measures to manage such discoveries, including immediate work stoppage, securing the discovery area, notifying relevant authorities and qualified cultural heritage experts, assessing the find, and implementing actions consistent with environmental and social requirements as well as national laws and regulations. The procedure also requires awareness-raising and training for relevant stakeholders.

The scope of the procedure includes understanding disaster threats, conducting risk assessments, implementing Disaster-Resilient Cultural Heritage management, and identifying stakeholders involved in disaster risk reduction. Cultural Heritage refers to tangible heritage in the form of objects, buildings, structures, sites, and cultural heritage areas on land and/or in water that require preservation due to their significant historical and scientific value.

For the category of Cultural Heritage Objects, mitigation measures are stipulated under Government Regulation No. 66 of 2015 on Museums. The regulation specifies that museum security, covering buildings, collections, and human resources, must be managed by the responsible authorities to protect against threats arising from both natural hazards and human actions.

In both emergency situations and normal conditions, communities and disaster-resilient Cultural Heritage managers are required to be prepared to anticipate, prevent, or minimize disaster-related damage, and to carry out prompt rescue and recovery measures.

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1. **Objectives:**
   - Integrate disaster risk reduction measures into the protection, development, and sustainable use of Cultural Heritage.
   - Ensure the safeguarding of Cultural Heritage during the pre-disaster, emergency response, and post-disaster phases.
   - Protect physical cultural resources from adverse impacts of activities and support their long-term preservation.
   - Promote fair and equitable sharing of benefits derived from the use of physical cultural resources.
2. **Procedure:**
   1) **Immediate Work Suspension**
      a. Stop all construction or excavation activities in the area where archaeological or cultural heritage remains are discovered.
   2) **Site Delineation and Securing**
      a. Clearly mark, delineate, and fence the discovery area.
      b. Secure the site to prevent damage, disturbance, or removal of artifacts.
      c. Arrange on-site guarding, including night security, if necessary, until competent authorities assume responsibility.
   3) **Protection of Finds**
      a. Prohibit workers or any other parties from handling, collecting, or removing discovered objects or remains.
      b. Implement preliminary protective measures to safeguard the find.
   4) **Notification and Documentation**
      a. Inform all activity personnel of the discovery and applicable protection measures.
      b. Record the discovery, including its location, description, and immediate actions taken.
      c. Notify the responsible local authorities and the relevant cultural heritage or archaeological institutions immediately (within 24 hours or less).
   5) **Assessment and Evaluation**
      a. Facilitate a preliminary assessment by the competent cultural heritage authority or Institute of Archaeology.
      b. Assess the significance of the find based on recognized cultural heritage criteria, including aesthetic, historical, scientific, social, and economic values.

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6) **Decision-Making by Authorities**
   a. Allow responsible authorities to determine appropriate management measures, which may include site preservation, conservation, restoration, salvage, or modification of the activity design or layout.
7) **Implementation of Mitigation Measures**
   a. Implement the authority-approved measures as formally communicated in writing.
   b. Mitigation of actions may include redesign, avoidance, protection, conservation, restoration, or preservation of the site or objects.
8) **Resumption of Works**
   a. Resume construction activities only after receiving formal clearance from the responsible authorities confirming that cultural heritage protection requirements have been met.
9) **Monitoring and Coordination**
   a. Cooperate with relevant authorities to monitor construction activities and ensure ongoing compliance with approved heritage protection and preservation measures.

Annex 18. Term of Reference (ToR) of Environmental & Social Audit

1. Background

The Environmental and Social (E&S) Audit is an instrument to determine the nature and extent of all environmental and social areas of concern at the activity, to identify and justify appropriate measures and actions to mitigate the areas of concern, estimates the cost of the measures and actions, and recommends a schedule for implementing them. The audit provides independent assurance that commitments, mitigation measures, and monitoring arrangements under the ESMS and applicable ESMPs or other instruments (e.g., AMDAL, UKL-UPL, SPPL) are applied consistently and effectively in practice.

The E&S Audit may be initiated for specific activities when the following conditions triggered during monitoring and evaluation stage: (i) repeated non-compliance identified in the implementation of the disbursement approval and the Proponent's E&S commitments; (ii) recurrent incidents and/or accidents at activity sites, (iii) the emergence of significant E&S impacts not previously identified during appraisal, and/or (iv) the existence of unresolved and/or overdue grievances particularly those related to E&S risk management received by the Review, Verification, and Evaluation (PVE) Team.

This ToR provides the operational framework for conducting E&S Audits for PFB-financed activities, ensuring alignment with SLS 1 principle and a clear linkage between the E&S management processes under Chapter 4. The audit approach is proportionate, focused, and tailored to the specific context and risk profile of the activity or proponent.

2. Objective

The objective of the E&S Audit under the PFB ESMS is to verify that environmental and social management measures are being implemented effectively by the proponent in accordance with:

a) The applicable SLS (may be supported by internationally recognized good practices in environmental and social risk management (e.g. EHS WBG Guidelines) as reference);
   - The procedures and commitments set out in the activity-specific ESMPs and other instruments; and
   - Applicable national regulatory requirements.

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The audit aims to:

- Identify significant environmental and social issues in the Activity, and assess their current status, specifically in terms of meeting the requirements of the SLS.
- Verify the adequacy and functioning of activity's E&S commitment and instruments; and
- Identify gaps/non-conformities, root causes, and propose time-bound corrective actions to improve E&S performance.
- Provide practical recommendations to strengthen E&S management plans, monitoring, and reporting.

3. Scope of the Audit

E&S Audit shall consider triangulate evidence via documents, observations, and interviews; apply do-no harm and ethical standards and ensure data protection and informed consent, especially for vulnerable groups; and follow health, safety and security protocols for site work, including necessary inductions or PPE. E&S Audit shall perform the following:

a) Document review
   a. Review activity documents (e.g., Supplementary ESIA, ESMP, AMDAL, UKL-UPL, SPPL, and other E&S instruments as guided by ESMS)
   b. Review contracts and roles of contractor and supervision consultant in E&S risk management

b) Site inspections and observations
   a. Conduct site walks across representative activity areas, observe work fronts, camps, waste storage, emission and effluent points, quarries, transport routes, sensitive receptors, and community interfaces.
   b. Verify controls and PPE for occupational health and safety.
   c. Use photos (geotagged where allowed) and checklists to document evidence.

c) Interviews and stakeholder engagement
   a. Interview implementing staffs, supervision consultants, contractors, subcontractors, workers (including women and vulnerable workers), community representatives, and/or GRM focal points.
   b. Review grievance logs for workers and communities; verify accessibility, confidentiality, non-retaliation, and resolution effectiveness.

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c. Where SEA/SH risks are relevant, verify confidentiality protocols, and referral pathways with trained personnel only, ensuring do-no-harm and survivor-centered approaches.

d) Sampling and verification
   a. Select a risk-based sample of sites, contracts, and records for deep-dive review, ensuring coverage of most significant activities and vulnerable groups.
   b. Cross-check monitoring data (air, water, noise, waste) against permit limits.

e) Thematic compliance checks
   a. Compliance checks against SLS
   b. Identify material E&S risks, including cumulative impacts and climate or disaster risks (if any) and assess resilience measures.

f) Corrective Action Planning
   a. For each non-conformity or gap, develop a Smart, Measurable, Achievable, Relevant, and Time-bound (SMART) CAP.

g) Capacity assessment
   a. Assess institutional capacity, staffing, training and resources at the proponent, supervision consultants, and contractors and recommend improvements.

The audit scope may be adjusted based on the risk level and needs.

4. Structure of the E&S Audit Report

The E&S Audit Report shall, at a minimum, include the following indicative sections:

a) Executive summary

- Concisely discusses significant findings and recommended actions.

b) Legal and institutional framework

- Analyzes the legal and institutional framework for the existing activities, including the issues set out in SLS 1-10 and any applicable environmental and social requirements as per government regulations.

c) Activity description

- Concisely describes the existing Activities, and the geographic, environmental, social, and temporal context.
- Identifies the existence of any plans already developed to address specific environmental and social risks and impacts (e.g., ESMP, land acquisition or resettlement plan, cultural heritage plan, biodiversity plan).
- Includes a map of sufficient detail, showing the site of the existing Activity.

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d) Environmental and social Issues associated with the existing activities.

- The review will consider the key risks and impacts relating to the existing activity. This will cover the risks and impacts identified in SLS 1–10, as relevant to the activity. The audit may also review issues not covered by the SLS, to the extent that they represent key risks and impacts in the circumstances of the activity.

e) Environmental and social analysis

- The audit will also assess (i) potential E&S risk and impacts arising from the implementation of the activity, taking into account the findings of the audit with regard to the existing activity; and (ii) the ability of the proponent to maintain ongoing compliance with the SLS.

f) Proposed environmental and social measures.

Based on the findings of the audit, this section will set out the suggested measures to address such findings. These measures will be then formalized in an Environmental and Social Corrective Action Plan (ESCAP) (see Annex 19) which shall be added into existing Proponent's Environmental and Social Commitment for the activity. Measures typically covered under this section include the following:

- Specific actions required to meet the requirements of the SLS;
- Corrective measures and actions to mitigate potentially significant environmental and/or social risks and impacts associated with the existing activities; and
- Measures to avoid or mitigate any potential adverse environmental and social risks or impacts associated with the proposed activity.

5. Outputs / Deliverables of the E&S Audit

a) **Audit Inception Report**

Determine the scope of the audit, the context of audited activities, the regulatory framework and SLS to be reviewed, and methodology for audit and risk assessment including plan, schedule, document request list, and stakeholder interview plan. These items will be the basis in conducting the audit and developing audit report.

b) **Draft E&S Audit Report**

The draft contains preliminary findings, compliance overviews, and E&S issues arising from implementation. The draft structure follows the framework of the audit report.

c) **Final E&S Audit Report**

The final report incorporating comments, consolidates the final findings, compliance status, findings-based analysis, and audit conclusions according to the audit report structure. This will include final ESCAP (see point d)) agreed with responsible parties.

d) **Environmental and Social Corrective Action Plan (ESCAP) Tracker**
The ESCAP (excel) that can be used as templates for monitoring. The ESCAP table template is presented in the ESCAP table in Annex 19.

e) **Annexes** (i.e., document request checklist, applicable permits and legal requirements)**.**

6. Qualifications of the Audit Team

The ESMS audit shall be conducted by an audit team that is independent from the activities being audited and free from any actual, potential, or perceived conflicts of interest. The audit team is expected to collectively possess competencies and experience that are commensurate with the nature, scale, and environmental and social (E&S) risk profile of the activities under review.

Overall, the audit team should demonstrate a balanced combination of technical expertise, practical experience, and contextual understanding of E&S risk management systems, including familiarity with E&S risk management applicable to disaster risk management.

The general requirements for the audit team, as follows:

- Advanced degree (master's or equivalent) in environmental science, environmental engineering, social sciences, environmental management, occupational health and safety, sociology/anthropology, or a related field with at least 7-10 years of demonstrated professional experience in environmental and social risk management, including direct involvement in implementation, monitoring, and/or auditing activities. A relevant bachelor's degree with significant experience (i.e., at least 9-12 years) may be considered.
- Experience assessing compliance against national E&S regulations and at least one multilateral development bank environmental and social frameworks (e.g., the World Bank ESF, IFC Performance Standards, WBG EHS Guidelines or other IFI standards).
- Experience preparing and reviewing E&S instruments, such as ESIAs, ESMPs, LARAPs, SEP, LMP, OHS plans, and/or biodiversity management plans and providing risk-based technical recommendations.
- Ability to provide clear, evidence-based audit reports with findings prioritized by risk and materiality, root cause analysis, and time-bound corrective action plans with responsible parties and verification criteria.
- Strong analytical, interviewing, and facilitation skills with diverse stakeholders (e.g., workers, contractors, community members) and the ability to work adaptively under emergency conditions or time constraints.

- Formal training or certification in ESMS, environmental and social safeguards, E&S auditing or ISO management systems (e.g., ISO 14001, ISO 45001) is highly desirable.
- Experience in disaster management, public programs, or comparable sectors is highly desirable.

The audit team may include, but is not limited to, the following areas of expertise:

a) Team Leader / Senior Environmental and/or Social Specialist

The audit team leader is expected to provide overall technical direction and quality assurance for the audit process. This role typically requires substantial professional experience (at least 10 years) in E&S audit experience. The team leader should have a strong working knowledge of World Bank ESF or IFC PS, as well as demonstrated experience in coordinating or leading audits, reviews, or compliance assessments for development or donor-funded programs.

b) Environmental Specialist(s)

Environmental specialists should contribute technical expertise relevant to the environmental aspects of the activities audited. This may include experience in environmental assessment, pollution prevention and control, waste and hazardous materials management, OHS, biodiversity conservation, and/or related disciplines. Familiarity with disaster-affected or post-disaster context is considered valuable.

c) Social Specialist(s)

Social specialists are expected to provide expertise on social risk management aspects, including stakeholder engagement, labor and working conditions, and SEA/SH risk mitigation. Experience in working with vulnerable groups, as well as exposure to disaster-affected or post-disaster contexts, is considered valuable to ensure that social risks and impacts are assessed in a manner that is sensitive to local conditions and implementation realities.

The composition of the audit team may be adapted as necessary to reflect the specific characteristics of the audited activities, including their scale, complexity, geographic context, and associated E&S risks and impacts (e.g., impacts on biodiversity and Indigenous People).

Annex 19. Environmental and Social Corrective Action Plan (ESCAP)

Standar Lingkungan dan Sosial/ SLS	Required Corrective and preventive Measures	Risk Level	Responsible Parties	Implementation Timeline	Indicator for Monitoring Completion and Effectiveness
SLS 1: Assessment and Management of Risk and Impact					
SLS 2: Labor and Working Condition					
SLS 3: Resource Efficiency and Pollution Prevention and Management					
SLS 4: Community Health and Safety					
SLS 5: Land acquisition, Restriction on Land Use and Involuntary Settlement					
SLS 6: Biodiversity conservation and Sustainable Management of Living Natural Resources					
SLS 7: Indigenous peoples					
SLS 8: Cultural Heritage					
SLS 10: Stakeholder Engagement and Information Disclosure					

Annex 20. Emergency Monitoring Checklist Template

This Emergency Monitoring Checklist is designed to facilitate rapid environmental and social (E&S) monitoring during emergency response operations. The checklist items are derived from Table 5.3: Existing Emergency Response and Strengthening through PFB ESMS (Chapter 5), which identifies E&S safeguard aspects and monitoring requirements across all Safeguard Standards (SLS 1-10) applicable to emergency response activities.

This template enables emergency response personnel to systematically verify E&S safeguard implementation during field operations, ensuring that critical E&S measures are in place despite the rapid and pressured nature of emergency response.

Instructions for Use:

a) Select the relevant monitoring checklist items from Table 5.3 based on the specific emergency response activities being conducted (e.g., shelter provision, health services, debris removal).
b) Conduct monitoring checks in the field, marking "Yes" if the safeguard is in place and functioning, or "No" if absent or inadequate.
c) Document evidence observed during monitoring (e.g., "PPE observed in use by debris removal workers," "Medical waste segregation containers present and labeled").
d) For any "No" responses, immediately report to the PVE E&S Specialist and implement corrective actions.
e) Submit completed checklists as part of daily Situation Reports (Sitreps) or as otherwise required by the PDB Command Post.

No	E&S Safeguard Aspects (per SLS)	Monitoring Checklist – Strengthening PFB ESMS	Yes	No	Evidence

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